

**HOME-American Rescue Plan  
(HOME-ARP)  
Supportive Services Program  
Manual  
2025--2030**



The HOME Consortium /  
Waukesha County  
Division of Community  
Development  
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## Contents

|                                                                                      |    |
|--------------------------------------------------------------------------------------|----|
| Chapter 1: General Information .....                                                 | 3  |
| 1. Introduction.....                                                                 | 3  |
| 2. Background.....                                                                   | 3  |
| 3. Program Overview .....                                                            | 4  |
| Chapter 2: Application Process .....                                                 | 4  |
| 1. Eligible Applicants.....                                                          | 4  |
| 2. Application Timeline.....                                                         | 5  |
| Chapter 3: Program Requirements.....                                                 | 6  |
| 1. Participant Eligibility – HOME-ARP Qualifying Populations .....                   | 6  |
| 2. Eligibility Screening & Documentation .....                                       | 13 |
| 3. Maximum Term of Supportive Services for Qualifying Populations .....              | 14 |
| 4. Overview of Eligible Activities & Reimbursable Costs .....                        | 14 |
| 5. Eligible Services .....                                                           | 15 |
| 6. Administrative Funds.....                                                         | 24 |
| 7. Non-Reimbursable Costs.....                                                       | 24 |
| Chapter 4: Administrative Requirements.....                                          | 25 |
| 1. Contractual Responsibility .....                                                  | 25 |
| 2. Contract Amendments .....                                                         | 25 |
| 3. Homeless Management Information Systems or Comparable Database Requirements ..... | 25 |
| 4. Coordinated Entry + Other Referrals Requirement.....                              | 26 |
| 5. Required Participant File Elements .....                                          | 26 |
| 6. Practices, Policies, Procedures & Documentation .....                             | 27 |
| 1. Accessibility Practices/Resources .....                                           | 27 |
| 2. Anti-Lobbying Requirements.....                                                   | 27 |
| 3. Participant Prioritization Documentation.....                                     | 27 |
| 4. Participant Termination Policy .....                                              | 27 |
| 5. Confidential, Proprietary and Personally Identifiable Information Policy .....    | 28 |
| 6. Conflict of Interest Policy.....                                                  | 29 |

|                                                                         |    |
|-------------------------------------------------------------------------|----|
| 7. Contractual Responsibility .....                                     | 30 |
| 8. Drug Free Workplace Policy.....                                      | 30 |
| 9. Equal Access .....                                                   | 30 |
| 10. Financial Management .....                                          | 30 |
| 11. Financial Statements .....                                          | 31 |
| 12. Monitoring .....                                                    | 31 |
| 13. No Faith Based Activities Requirements or Religious Influence ..... | 31 |
| 14. PRWORA Act.....                                                     | 31 |
| 15. Non-Discrimination Policy for Participants & Employees.....         | 31 |
| 16. Recordkeeping and Retention .....                                   | 32 |
| 17. Residency .....                                                     | 32 |
| 18. Signing Authority Documentation .....                               | 32 |
| 19. Trauma-Informed Care Practices .....                                | 32 |
| 20. Maximum Term of Service Policy.....                                 | 32 |
| Chapter 5: Financial Management .....                                   | 33 |
| 1. Tracking of Funds .....                                              | 33 |
| 2. Audit .....                                                          | 33 |
| Chapter 6: Quarterly Funds Disbursement & Financial Updates .....       | 34 |
| Chapter 7: Reporting .....                                              | 35 |
| 1. Quarterly Reporting.....                                             | 35 |
| Chapter 8: Annual Monitoring.....                                       | 36 |
| Chapter 9: Operating Funds.....                                         | 37 |
| Chapter 10: Capacity Building Funds.....                                | 38 |

# Chapter 1: General Information

## 1. Introduction

Waukesha County/The HOME Consortium developed this Program Manual as a resource for the Supportive Services activity as a part of the larger HOME-American Rescue Plan Program (HOME-ARP). HOME-ARP Supportive Services Subrecipients are required to follow all state and federal requirements, policies, and procedures in this Program Manual.

## 2. Background

The HOME program was created by the National Affordable Housing Act of 1990. The statutory purpose of the HOME program is “to increase the number of families served with decent, safe, sanitary, and affordable housing and expand the long-term supply of affordable housing”. Regulations governing HOME are published in 24 CFR Part 92 (Final Rule, published July 24, 2013, as amended (effective August 23, 2013)).

On March 11, 2021, the American Rescue Plan Act of 2021 was signed into law and on September 13, 2021, the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development Division issued Notice CPD-21-10. Notice CPD-21-10 establishes the requirements for HOME-ARP funds appropriated under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2). In addition to Notice CPD-21-10, HUD has issued a memorandum describing waivers and alternative requirements for the HOME-ARP Program. A link to that memorandum can be found as follows:

<https://www.hudexchange.info/resource/6479/notice-cpd-2110-requirements-for-the-use-of-funds-in-the-home-arp-program/>

The information in this Program Manual and application guide for the HOME-ARP Supportive Services program is current as of September 2025.

HOME-ARP is a brand-new program and HUD implementation tools are under development. Additional HUD guidance is anticipated in the future. Interested applicants are encouraged to visit <https://www.hudexchange.info/programs/home-arp/> for additional updates and guidance. This Program Manual may be amended by Waukesha County / The HOME Consortium in the event HUD issues future guidance regarding this program.

### 3. Program Overview

HOME-ARP funds may be used to provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP funding programs.

Supportive services available for funding under the HOME-ARP Supportive Services activity include:

- a) Services listed in Section 401(29) of the McKinney-Vento Homeless Assistance Act (“McKinney-Vento Supportive Services”) and as defined under 42 U.S.C. § 11360(29).
- b) Homelessness prevention services as described in Sections VI.D.3 and D.4 of the [CPD Notice 21-10](#) and;
- c) Housing counseling services under HOME-ARP which are services that are consistent with the definition of “housing counseling” and “housing counseling services” defined at [24 CFR §§ 5.100](#) and [5.111](#).

All grants were awarded through an application cycle in Fall of 2023. Those applicants who apply for and are awarded HOME-ARP Supportive Services funds (Subrecipients) will enter into a funding agreement with Waukesha County. The funding agreements of such Subrecipients who demonstrate successful implementation of the program and are compliant with Waukesha County and HUD rules and regulations will be automatically renewed for an additional twelve (12) months, every year for 5 years. The initial funding cycle will begin on July 1, 2025 and end July 31, 2026. All succeeding grant cycles will consist of a 12-month grant period through June 30, 2030. Assistance may not extend beyond this period.

## Chapter 2: Application Process

### 1. Eligible Applicants

Eligible applicants are limited to local government agencies, elected governing bodies of federally recognized American Indian tribes or bands in the State of Wisconsin, governing bodies of a county, city, village, or town, housing authorities, private/not-for-profit organizations, or religious societies as defined under Chapter 187 of the Wisconsin Statutes. Applicants must provide services to qualifying households in Jefferson, Ozaukee, Washington or Waukesha Counties only. Applicants are also required to be subscribers of HMIS or a comparable database.

### 2. Application Timeline

The HOME-ARP Supportive Services application timeline is as follows and is subject to change:

|                   |                                                                         |
|-------------------|-------------------------------------------------------------------------|
| September 2023:   | Application available                                                   |
| October 27, 2023: | Application due                                                         |
| November 2023:    | HOME Consortium Supportive Services Committee Review and Recommendation |
| December 2023:    | HOME Board Review and Approval                                          |
| Contract issued:  | August 2025                                                             |

## Chapter 3: Program Requirements

### 1. Participant Eligibility – HOME-ARP Supportive Services Qualifying Populations

The HOME-ARP Supportive Services activity has a narrow definition of who can be served. The following four (4) Qualifying Populations are eligible to receive services and are defined below:

- “Homeless” as defined under 24 CFR § 91.5;
- “At-risk of homelessness” as defined under 24 CFR § 91.5;
- Those fleeing or attempting to flee “domestic violence”, “dating violence”, “sexual assault”, “stalking,” or “human trafficking” as defined under 24 CFR § 5.2003 or the Trafficking Victims Protection Act of 2000.
- “Other populations” – where supportive services or assistance would prevent a family’s homelessness or serve those with the greatest risk of housing instability, as defined in Section IV of CPD 21-10.
- Veterans and families that include a veteran member that meet one of the preceding criteria.

### Homeless

For the purposes of the HOME-ARP Supportive Services program, the designation of “homeless” requires meeting one (1) of the following three (3) definitions:

1. An individual or family who:
  - a. Has 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; or
  - b. Is 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
  - c. 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:
  - a. The primary nighttime residence will be lost within 14 days of the date of application for assistance; and
  - b. No subsequent residence has been identified; and

- c. 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. Families with children and youth, or unaccompanied youth under 25 years of age, who do not otherwise qualify as homeless as defined in 1 or 2 above, but who:
  - a. 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 (34 U.S.C. § 12473)), 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);
  - b. 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;
  - c. 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
  - d. Can be expected to continue in such status for an extended period of time because of:
    - i. Chronic disabilities;
    - ii. Chronic physical health or mental health conditions;
    - iii. Substance addiction;
    - iv. Histories of domestic violence or childhood abuse or neglect;
    - v. The presence of a child or youth with a disability; or
    - vi. Two or more of the following barriers to employment:
      - 1. Lack of a high school degree or General Educational Development (GED);
      - 2. Illiteracy;
      - 3. Low English proficiency;
      - 4. History of incarceration or detention for criminal activity;
      - 5. A history of unstable employment.



## At Risk of Homelessness

For the purposes of the HOME-ARP Supportive Services program, “at risk of homelessness” requires meeting one (1) of the following two (2) definitions:

1. An individual or family who:
  - a. Has an annual income below 30 percent of median family income, adjusted for household size, for the area, as determined by HUD; and
  - b. 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 a public or private place not meant for use as a regular sleeping accommodation by human beings; and
  - c. Meets one of the following conditions:
    - i. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homeless 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 people 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).
2. A child or youth who does not qualify as homeless as defined above, but qualifies as homeless because they are:
  - a. An individual under 18 years of age who cannot live safely with a parent, legal guardian, or relative, and has no other safe alternative living arrangement.
  - b. An individual who has a primary nighttime residence that provides a

temporary residence for individuals intended to be institutionalized or has a temporary accommodation for not more than 90 days in the residence of another individual.

### **Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

For the HOME-ARP Supportive Services program, this Qualifying Population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. *There is no requirement that individuals and families also meet the HOME-ARP Supportive Services program definition of homeless, at risk of homelessness, or “other” Qualifying Population.*

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 assistance.

### **Domestic Violence**

Domestic violence 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 State of Wisconsin; 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 State of Wisconsin.

### *Dating Violence*

Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of the relationship is determined considering:

1. The length of the relationship;
2. The type of relationship; and
3. The frequency of interaction between the persons involved in the relationship.

### *Sexual Assault*

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

### *Stalking*

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

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

### *Human Trafficking*

For the purposes of the HOME-ARP Supportive Services program, human trafficking includes both sex and labor trafficking, defined as:

1. For sex trafficking, 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.
2. For labor trafficking, 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.

## **“Other” Qualifying Population**

For the purposes of the HOME-ARP Supportive Services program, “other” Qualifying Population means individuals and families who do not meet the definition of homeless, at-risk of homelessness, or fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking as defined above and:

1. Require services or housing assistance to prevent repeat homelessness; or
2. At greatest risk of housing instability.

### *Households Requiring Services or Housing Assistance to Prevent Repeat Homelessness*

Households may receive HOME-ARP Supportive Services or housing assistance as a HOME-ARP Qualifying Population if they meet all of the following three (3) eligibility criteria:

1. Previously qualified as homeless as defined above, or previously qualified as homeless because:
  - a. The individual or family was fleeing, or 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 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; and
  - b. Have no other residence; and
  - c. Lack the resources or support networks, such as family, friends, faith-based or other social networks, to obtain other permanent housing; **and**
2. Are currently housed with 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**
3. Need additional housing assistance or supportive services to avoid a return to homelessness.

### *Households at Greatest Risk of Housing Instability*

Households are at greatest risk of housing instability and a HOME-ARP Supportive Services Qualifying Population when they meet one (1) of the following two (2) definitions:

1. Have an annual income that is less than or equal to 30% of the County Median Income (CMI) and are paying more than 50% of monthly household income toward housing costs (are severely cost burdened); **or**
2. Have annual income that is less than or equal to 50% of the CMI, **and** meet **one**

(1) of the following conditions:

- a. Moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- b. Living in the home of another because of economic hardship;
- c. Have been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau; or
- 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).

## 2. Eligibility Screening & Documentation

All HOME-ARP Supportive Services activities must use the Continuum of Care's Coordinated Entry system plus other referral methods to screen and identify qualifying service households. Each project is required to maintain a waiting list of qualified applicants. By expanding the Coordinated Entry process to include referrals from other sources, and keeping a specific waiting list for each project, agencies will have the ability to include all of the Qualifying Populations described in this Program Manual and CPD Notice 21-10.

### Coordinated Entry + Other Referrals List

Each HOME-ARP Supportive Services Subrecipient will be required to establish a Coordinated Entry list plus other referral methods in coordination with the HUD-recognized Continuum of Care (CoC) in their service area. Subrecipients may accept referral sources that could include County Human Services, police and sheriff departments, nonprofit agencies not participating in the CoC process, and other referral sources as identified by the Subrecipient. Subrecipients shall maintain activity-specific waiting lists for each HOME ARP funded project that prioritize target populations, followed by other qualifying populations, on a first-come, first-served basis.

### Screening

Households will be screened by Subrecipient staff to ensure qualification as a HOME-ARP Supportive Services Qualifying Population. Such information must then be entered into the waiting list for the program.

### Entry Process for Qualifying Population Units

1. Qualified applicants will be pulled from the Coordinated Entry list based on preference (if the program has preferences) and from referrals.
  - a. A preference for specific Qualifying Populations may be identified, but this preference does not act as a limitation. Specific Qualifying Populations may be prioritized in a list of qualified applicants, but if there are no households from that population eligible for the services, services must be made available to the next qualifying household that submitted their completed application from the project waitlist, in chronological order.
  - b. The HOME Consortium's HOME-ARP Allocation allows for the adoption of any of the following preferences for HOME-ARP Supportive Services Activities that provide housing stabilization and homelessness prevention services:
    - **Preference #2:** Individuals at risk of homelessness, as defined in 24 CFR § 91.5.

- **Preference #4: “Other” Qualifying Populations;** which means individuals and families who do not meet the definition of homeless, at-risk of homelessness, or fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking as defined above and:
  1. Require services or housing assistance to prevent repeat homelessness; or
  2. At greatest risk of housing instability.
- c. In the case that there are no households from preferred Qualifying Populations, all other Qualifying Population households become eligible to receive supportive services.
- d. Members of the “Other” Qualifying Population will still be able to apply for all HOME-ARP funded projects, including those that have stated preferences. Additionally, all Qualifying Populations may be referred to and apply for any HOME ARP program.

### 3. Maximum Term of Supportive Services for Qualifying Populations

Program participants are not required to accept supportive services as a condition of occupancy or tenancy and may request services at any time during occupancy or tenancy subject to availability and HOME-ARP Supportive Services program time limitations. Changes in income shall not impact a program participant’s status as a Qualifying Population. Once a household qualifies as a Qualifying Population household, they hold that status and must be served by the HOME-ARP Supportive Services program until the earlier of June 30, 2030, or until the individual or family:

1. Voluntarily terminates HOME-ARP Supportive Services; or
2. Obtains needed supportive services from another source.

Otherwise, maximum service periods may be determined by the Subrecipient and specified in Subrecipient’s Agreement with Waukesha County and must apply to all program participants once they are designated as a Qualifying Population.

### 4. Overview of Eligible Activities & Reimbursable Costs

HOME-ARP Supportive Services funding is available for the following eligible services for Qualifying Populations, including those who are tenants or prospective tenants of HOME-ARP Rental Housing. Services may only be offered to households (individuals and families) that meet the definition of a Qualifying Population at the time of application for services. Eligibility must be documented prior to providing HOME-ARP Supportive Services funded services.

These services can be offered as a separate activity or in conjunction with rental housing development activity. Households may not already be receiving these services through

another program. A more detailed description of eligible services is available in [CPD Notice 21-10](#).

There are three (3) categories of eligible supportive services:

- McKinney Vento
- Homelessness Prevention
- Housing Counseling

All qualifying individuals and families are eligible to receive supportive services under the supportive services activity. The Subrecipient must establish requirements for documenting eligible costs for an individual or family in a Qualifying Population as McKinney-Vento supportive services, homelessness prevention services, or housing counseling as appropriate. If a person is homeless, then the person is eligible to be provided the supportive services as McKinney-Vento supportive services for the costs allowable under the notice. If such program participant falls under any of the other Qualifying Populations, then all costs must be documented as homeless prevention costs. Housing counseling by a HUD-certified counseling agency must also be documented as such regardless of which Qualifying Population the recipient household qualifies as. Housing Counseling activities will not be described in detail in this manual, as no Subrecipients have been selected to provide this service using HOME ARP for Waukesha County/The HOME Consortium.

## 5. Eligible Services

### 1. McKinney Vento & Homelessness Prevention Services

- A. Assessment of service needs, and existing services secured by the individual or family.
- B. Benefits and services navigation.
- C. Food, limited to meals or groceries, for program participants.
- D. Housing search and stability case management provided as part of a holistic case management package (not stand-alone), limited to:
  - i. Tenant Counseling;
  - ii. Developing, securing, and coordinating services including federal, state, and local benefits;
  - iii. Monitoring and evaluating program participant progress;
  - iv. Providing information and referrals to other providers;
  - v. Developing an individualized housing and service plan.
  - vi. Housing search;
  - vii. Securing Utilities;
  - viii. Making moving arrangements;
  - ix. Outreach to and negotiation with owners;
  - x. Assistance submitting rental applications and understanding leases;



- xi. Landlord/tenant mediation;
  - xii. Credit counseling;
  - xiii. Payment of rental application fees.
- E. Childcare, including providing meals and snacks, and comprehensive and coordinated developmental activities.
- i. The childcare center must be licensed by the jurisdiction in which it operates.
  - ii. Children must be under the age of 13 unless the children have a disability.
  - iii. Children with a disability must be under the age of 18.
- F. Education services to improve knowledge and basic educational skills, limited to:
- i. Individual or group instruction or training in:
    - a. Consumer education;
    - b. Health education;
    - c. Substance abuse prevention;
    - d. Literacy;
    - e. English as a Second Language; and
    - f. General Educational Development (GED).
  - ii. Screening, assessment, and testing;
  - iii. Tutoring;
  - iv. Provision of books, supplies, and instructional material;
  - v. Counseling; and
  - vi. Referral to community resources.
- G. Employment assistance and job training, including the costs of establishing and/or operating employment assistance and job training programs. Employment and job training programs may be provided in a classroom, online and/or as computer instruction, or as on-the-job instruction limited to:
- i. Services that assist individuals in securing employment, including:
    - a. Employment screening, assessment, or testing;
    - b. Structured job skills and job-seeking skills;
    - c. Special training and tutoring, including literacy training and prevocational training;
    - d. Books and instructional material;
    - e. Counseling or job coaching; and
    - f. Referral to community resources.
  - ii. Services that assist individuals in acquiring learning skills, including skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates; and
  - iii. Reasonable stipends to program participants in employment assistance and job training programs.

- H. Legal services, including participant intake, receiving, and preparing cases for trial, provision of legal advice, representation at hearings, and counseling, that are provided by a licensed attorney or a person under the direct supervision of a licensed attorney. Filing fees and other necessary court costs.
  - i. Fees based on the actual service performed (i.e., fee for service) are eligible only if the cost would be less than the cost of hourly fees. Retainer fee arrangements and contingency fee arrangements are prohibited.
  - ii. If the contractor is a legal services provider and performs the services itself, the eligible costs are the contractor's employees' salaries and other costs necessary to perform the services. All costs must be directly attributable to a HOME-ARP Supportive Services program participant.
  - iii. Legal services for immigration and citizenship matters and for issues related to mortgages and homeownership are ineligible.
  - iv. Legal services must be necessary to assist a qualifying household to obtain housing and are limited to the following subject matters.
    - a. Child support;
    - b. Guardianship;
    - c. Paternity;
    - d. Emancipation;
    - e. Legal separation;
    - f. Orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking;
    - g. Appeal of veterans and public benefit claim denials;
    - h. Landlord-tenant disputes; and
    - i. Resolution of outstanding criminal warrants when those warrants are prohibiting the program participant from obtaining permanent housing.
- I. Life skills training, including teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, dating violence, sexual assault, stalking, human trafficking, substance abuse, and homelessness. These services must be necessary to assist the program participant to function independently in the community. Life skills training includes:
  - i. Budgeting resources and money management;
  - ii. Household Management;
  - iii. Conflict Management;
  - iv. Shopping for food and other needed items;

- v. Nutrition;
  - vi. Using public transportation;
  - vii. Parent training.
- J. Mental health services provided on an outpatient basis by licensed professionals that apply therapeutic processes to personal, family, situational, or occupational problems to bring about positive resolution of the problem or improved individual or family functioning or circumstances, limited to:
  - i. Crisis interventions;
  - ii. Counseling;
  - iii. Individual, family, or group therapy sessions;
  - iv. The prescription of psychotropic medications or explanations about the use and management of medications; and
  - v. Combinations of therapeutic approaches to address multiple problems.
- K. Outpatient health services provided by licensed medical professionals to treat medical conditions, limited to:
  - i. Analysis or assessment of a program participant's health problems and the development of a treatment plan;
  - ii. Assisting program participants to understand their health needs;
  - iii. Providing directly or assisting program participants to obtain and utilize appropriate medical treatment;
  - iv. Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
  - v. Provision of appropriate medication;
  - vi. Necessary follow-up services; and
  - vii. Preventive and non-cosmetic dental care.
- L. Substance abuse treatment services by licensed or certified professionals to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors, limited to:
  - i. Intake and assessment;
  - ii. Outpatient treatment;
  - iii. Group and individual counseling; and
  - iv. Drug testing.
- M. Transportation, limited to:
  - i. The costs of program participant's travel on public transportation or in a vehicle provided by the service organization to and from medical care, employment, childcare, or HOME-ARP Supportive Services eligible supportive services;

- ii. Mileage allowance for service workers to visit program participants and to carry out housing inspections; and
  - iii. The costs of staff to accompany or assist program participants to utilize public transportation.
- N. Case management, including assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participant(s), limited to:
  - i. Conducting an initial evaluation, including verifying and documenting eligibility;
  - ii. Counseling;
  - iii. Developing, securing, and coordinating services;
  - iv. Obtaining federal, state, and local benefits;
  - v. Monitoring and evaluating program participant progress;
  - vi. Providing information and referrals to other providers;
  - vii. Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
  - viii. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
  - ix. Conducting re-evaluations of the program participant's eligibility and the types and amounts of assistance the program participant needs.
- O. Credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- P. Landlord/Tenant liaison services between property managers/owners and program participants, limited to:
  - i. Landlord outreach;
  - ii. Physical inspections as needed to secure units;
  - iii. Rental application fees and security deposits; and
  - iv. Coordination with other HOME-ARP eligible services to assist participants to maintain permanent housing.
- Q. Mediation: HOME-ARP Supportive Services funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- R. Outreach services: Activities to engage qualified populations for the purpose of providing immediate support and intervention, identifying potential program

participants, limited to:

- i. Outreach worker's transportation costs and a cell phone;
- ii. Initial assessment;
- iii. Crisis counseling;
- iv. Addressing urgent physical needs (such as providing meals, blankets, clothes, or toiletries);
- v. Connecting and providing people with information and referrals to homeless and mainstream programs;
- vi. Publicizing the availability of the housing and/or services available through the HOME-ARP program.

## **2. McKinney-Vento & Homelessness Prevention Financial Assistance**

HOME-ARP McKinney-Vento and Homelessness Prevention funds may be used to pay housing owners, utility companies, and other third parties for the following costs, as applicable:

- A. Rental application fees: rental housing application fee that is charged by the owner to all applicants.
- B. Short-term/medium-term rental assistance: can cover up to 24 months of rental payments over a 3-year period. First and last month's rent count towards the 24-month limit. Security deposits do not count towards the 24-month limit.
  - i. The Grantee must have a written policy for providing rental assistance (plus utilities, if applicable) outlining the maximum length of support, the client payment requirements and what would trigger a reassessment of the amount of support.
  - ii. The unit must be at or under fair market rent (FMR; includes rent and basic utilities; rates can be found at HUDUser.gov) and comply with rent reasonableness. Compliance must be documented before rental payments are made.
  - iii. The client must have a written legally binding lease between themselves and the owner. The lease must be signed before financial assistance is provided and a copy of the signed document must be kept in the client's file. New leases must have an initial term of 1 year unless a shorter period is agreed upon by the program participant and owner. The lease requirements in 24 CFR § 92.359 apply including:
    - a. Lead-Based Paint Disclosure form including the provision of a Lead Safety Pamphlet, unless the unit was built after 1978 and no child under 6 or pregnant woman will be in residence.
    - b. VAWA Lease Addendum (HUD form 91067) if the content within the addendum is not already incorporated in the original lease.

- iv. Notice of Occupancy Rights Under VAWA (HUD form 5380) and Certification of VAWA Incident Documentation (HUD form 5382) must be provided to the client and a signed receipt from the client must be collected and kept in the client's file.
- v. Rental Assistance Agreement must be signed between the client and the Grantee outlines:
  - a. What specific assistance the client can expect based on a specific unit.
  - b. Time period of support (must follow the limited outlined in this document, can be up to the end of the performance period or the Grantee's maximum period of support whichever is shorter).
  - c. Who the assistance will be provided to (must be provided directly to the landlord, or utility company).
  - d. What can impact the level/amount of assistance received and when the level/amount will be reviewed and potentially revised.
  - e. What costs the client is responsible for cover (example: utilities not mentioned specifically in the agreement).
  - f. When the client needs to provide updates to the Grantee (example: income changes, changes in housing status, moving in or out of the unit, etc).
- vi. The unit must pass a Habitability Inspection (per 24 CFR 576.403), including a Lead-Based Paint Inspection, and Carbon Monoxide Detector Inspection. Documentation of the unit passing these inspections must be kept in the client's file.
- vii. All of the above documentation must be completed before the Financial Assistance Agreement is signed between the owner and the Grantee. A signed copy of the Financial Assistance Agreement must be kept in the client's file. The Financial Assistance Agreement outlines the terms under which rental payments and utility payments (if utilities are provided by the owner) will be provided. The Financial Assistance Agreement must include:
  - a. The provision that, during the term of the agreement, the owner must give the organization a copy of any notice to the client to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the client. The owner must serve written notice upon the client at least 30 days before termination of tenancy specifying the grounds for the action.
  - b. Each Financial Assistance Agreement that is executed or renewed must comply with the requirements in 24 CFR § 92.359(Violence

Against Women Act (VAWA)) including: Attaching VAWA lease addendum (HUD form 91067) to the lease (if the original lease does not already include this information) outlining all required elements: Right for the lease to be broken without penalty, if the tenant qualifies for an emergency transfer; Language that protects individuals from being denied access to housing and/or evicted from their housing on the basis of or as a direct result of being a survivor; Construction of lease terms and terms of assistance; Limitation of VAWA protections; Confidentiality requirements. Providing the notification of occupancy rights under VAWA (HUD form 5380), and certification form (HUDform5382) when the client receives notification of eviction; The same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The agency is solely responsible for paying with non-HOME-ARP funds any late payment penalties that it incurs.

- viii. After steps above have been completed, rental assistance can be provided. Paperwork must be redone annually.
  - ix. The Grantee cannot provide monthly rental assistance (or arrears, security deposits, application fees, etc.) associated with the Grantee's owned units as this would be a conflict of interest.
- C. Security deposits can cover an amount that is equal to no more than 2 months' rent. This assistance is separate and distinct from the provision of financial assistance for first and last month's rent provided under this section and cannot be used to duplicate those costs. The security deposit must be provided as a grant (not a loan) and the owner must return the security deposit to the client minus any applicable damage costs. All of the requirements for rental assistance as outlined above must be completed in order to provide security deposit assistance. Security deposit does not count towards the 24-month rental assistance limit over a 3-year period.
- D. First/last month's rent: can be provided if it is necessary for the client to obtain housing. The need must be documented.
- i. First/last month's rent can ONLY be paid when the security deposit is paid. It cannot be paid before or after. The amount cannot exceed 2 months' rent total.
  - ii. All of the requirements for rental assistance as outlined above must be completed to provide first/last month's assistance.
  - iii. First and last month's rent does count towards the 24-month rental assistance limit over a 3-year period.

- E. Rental arrears: can cover a 1-time payment of up to 6 months of rental arrears plus associated late fees and charges, if it is necessary for the client to maintain their housing or for those without housing, to obtain housing. The need must be documented.
  - i. Arrears and associated late fees and charges can only be paid to the owner.
  - ii. The client must have a signed lease, and a copy of the lease must be saved in the client's file along with documentation of the outstanding balance (arrears, fees, and charges).
    - (1) Rental arrears do not count towards the 24-month rental assistance limit.
    - (2) The unit does not have to be under FMR or comply with rent reasonableness.
- F. Emergency transfer: if the client meets the conditions for an emergency transfer, the amount owed for breaking the lease to effectuate the emergency transfer can be covered. Emergency transfer costs do not count toward the 24-month rental assistance limit.
- G. Utility deposits can be covered if it is a standard utility deposit or initiation fee required by the utility company or owner (if owner-paid utilities are provided for all tenants). Gas, electric, water and sewer can be covered.
- H. Utility payments can cover up to 24 months of utility payments within a 3-year period per service. Gas, electric, water and sewer can be covered. Utility Arrears can cover up to 6 months per service. Gas, electric, water and sewer are eligible.
  - i. The Grantee must have a written policy for providing utility assistance, if it is provided as a stand-alone service, not in combination with rental assistance. This policy must outline the maximum length of support, the client payment requirements and what would trigger a reassessment of the amount of support. If providing utility payments as a stand-alone service, a Utility Assistance Agreement must be signed by the client and the Grantee and should cover: What specific assistance the client can expect; Time period of support; Who the assistance will be provided to (assistance must be provided directly to the utility company or the owner if utilities are covered by the owner); What type of utilities will be covered (gas, electric, water and/or sewer) and at what levels; What can impact the level/amount of assistance received and when the level/amount will be reviewed and potentially revised; What costs the client is responsible for covering; When the client needs to provide updates to the organization.



If utility payments are provided as part of the Rental Assistance Agreement a separate utilities only agreement is not needed.

- ii. Can only be provided if the client or a member of the household has an account in his/her name or proof of responsibility to make payments (example: cancelled checks). Documentation of this must be kept in the client's file.
  - iii. Payments can only be paid to the utility company or to the owner (if utilities are paid by the owner).
  - iv. Bills from utility companies for all payments made must be kept as backup along with documentation of payments made. If utilities are covered by the owner, the lease will need to clearly list which utilities are covered and which are not, and the cost structure (flat rate, metered etc.) for those utilities. A copy of the lease must be kept in the client file.
  - v. Utility payments do not count towards the 24-month rental assistance limit.
- I. Moving and storage costs: may cover moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

## 6. Non-Reimbursable Costs

HOME-ARP Supportive Services funds may not be spent on the following:

- Anything not explicitly stated as allowable under the grant terms.
- Alcoholic beverages.
- Items that could be construed as entertainment, including social activities and tickets to movies, shows, sports events, or concerts, and any costs related to attending such events, whether or not admission is charged.

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources. If it is found a Subrecipient used grant funds for any of the above outlined non-reimbursable items/activities, the Subrecipient will be required to repay to Waukesha County / The HOME Consortium the dollars used for the non-reimbursable items/activities.

## Chapter 4: Administrative Requirements

### 1. Contractual Responsibility

Subrecipients must commit to providing the services mutually agreed upon in any grant agreement executed under the HOME-ARP Supportive Services program.

### 2. Contract Amendments

Subrecipients may request contract amendments to their grant agreements. Grant agreement amendments must be approved by the HOME Board.

### 3. Homeless Management Information Systems or Comparable Database Requirements

As a condition of funding, Subrecipients are required to use either the Homeless Management Information System (HMIS) database or an HMIS comparable database (if they are a Domestic Violence service provider) as one source for maintaining clients on a waiting lists for their projects.

A list of participants served in the HOME-ARP Supportive Services program must be able to be produced upon request. At minimum this participant list needs to show unique participant identifiers such as entry and exit dates into the program. Subrecipients must maintain an accurate record of participants served and must comply with all HMIS participation requirements including attending applicable training throughout the performance period of the grant agreement.

These databases are used to measure the scope of homelessness in Wisconsin, track service delivery, and help evaluate the effectiveness of service interventions. Subrecipients will be required to provide Quarterly Reports and Annual Reports leveraging HMIS. See Chapter 7: Reporting of this Program Manual for further information.

### 4. Coordinated Entry + Other Referrals Requirement

Coordinated Entry refers to a single place or process for people to access homelessness prevention, housing, and related services within a given CoC. HUD COCs are required to develop a system for CE and Subrecipients are required to participate in CE. In addition to CE, other referral methods are to be incorporated into the Subrecipient's policies and procedures in order to properly include all HOME-ARP Qualifying Populations. Subrecipients must use both CE and other referral sources to evaluate participant eligibility for the HOME-ARP Supportive Services program in partnership with a local CoC. Subrecipient may accept referral sources that could include County Human Services, police and sheriff departments, nonprofit agencies not participating in the CoC process, and other referral sources as identified by the Subrecipient.

Subrecipient shall maintain activity-specific waiting lists for each HOME ARP funded project that prioritize target populations, followed by other qualifying populations, on a first-come, first-served basis.

Documents demonstrating participant eligibility as a Qualifying Population, screened using the HOME-ARP CE process plus other referral sources, must be included in participant files.

### 5. Required Participant File Elements

A participant file must be created for each participant in the HOME-ARP Supportive Services program. The participant file must contain the following:

1. Screening documentation, initial assessment and/or application through the CE + Other Referral Sources process.
2. Documentation certifying that services are not duplicated by another public source. Subrecipient may use the HOME Consortium's Duplication of Benefits form.
3. Documentation of services provided and referrals made.
4. Participant signed receipt of receiving the supportive service program termination policies and procedures, as well as any correspondence related to a termination proceeding, if applicable.
5. If financial assistance is provided for security deposits, first and last months' rent, and short or medium-term rental assistance using HOME-ARP Supportive Services funding, the following materials must be preserved in participant files:
  - a. Lease and rental assistance agreements must be preserved in participant files.
  - b. Documents asserting that rental assistance is not used in a unit where tenant is receiving other rental assistance directly or through a project-based subsidy or other source of funds.
  - c. Documentation that unit complied with FMR and/or rent reasonableness limits.
  - d. Records evidencing unit inspections for these forms of assistance are also required as:
    - i. HUD-provided forms for [Habitability \(for Permanent Housing\)](#).
6. Entry and exit (if applicable) dates from program in HMIS (or comparable database) using screenshots.

When sharing participant files with Waukesha County / The HOME Consortium, all Personally Identifiable Information (PII) including participant names must be redacted and all copies of security cards, driver's licenses, birth certificates, etc. must be removed. Copies of these documents should never be kept in participant files. All participants' files must be shared with Waukesha County / The HOME Consortium through secure means.

## 6. Practices, Policies, Procedures & Documentation

The following practices, policies, procedures, and documentation of such are required of each Subrecipient and may be reviewed during the application process and during yearly monitoring.

### 1. Accessibility Practices/Resources

Each Subrecipient should have resources and practices in place to communicate with all potential beneficiaries including those with limited or no English. Further, facilities and programming should be accessible to people with disabilities including, but not limited to, people with vision loss, hearing loss, physical/mobility concerns, and learning disabilities.

### 2. Anti-Lobbying Requirements

Each Subrecipient is required to have a policy in place to ensure compliance with anti-lobbying requirements. HOME-ARP Supportive Services funds may not be used to influence federal or state contracting, federal or state financial transactions, or federal or state cooperative agreements.

### 3. Participant Prioritization Documentation

Each Subrecipient must have written documentation outlining how eligible individual families will be prioritized within the Coordinated Entry + Other Referral Sources process, and how it will be decided which of those families will ultimately enter the HOME-ARP Supportive Services program. While households who meet the Subrecipient's preference must be prioritized, all Qualifying Populations must be served, in chronological order of application.

### 4. Participant Termination Policy

The Subrecipient must establish policies and procedures for termination of assistance to program participants. In terminating assistance to a program participant, the Subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under due process of law. This process, at a minimum, must consist of:

- i. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
- ii. Written notice to the program participant containing a clear statement of the reasons for termination;
- iii. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or

- approved the termination decision; and
- iv. Prompt written notice of the final decision to the program participant.

During this process, the Subrecipient must provide effective communication and accessibility for individuals with disabilities, including the provision of reasonable accommodations. Similarly, the Subrecipient must provide meaningful access to persons with Limited English Proficiency (LEP).

#### 5. Confidential, Proprietary and Personally Identifiable Information Policy:

All Subrecipients must develop and implement written confidentiality procedures to ensure:

- All records containing personally identifying information of any person or family who applies for and/or receives HOME-ARP Supportive Services assistance will be kept secure and confidential.
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the HOME-ARP Supportive Services program will not be made public except with written authorization of the person responsible for the operation of the program.
- Subrecipients must develop and implement procedures to ensure the confidentiality of records pertaining to any person provided family violence prevention or treatment services under any project funded under the HOME-ARP Supportive Services 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.
- The use or disclosure by any party of any information concerning eligible individuals who receive services for any purpose not connected with the administration of the program is prohibited except with the informed, written consent of the eligible individual, or the individual's legal guardian.

#### 6. Conflict of Interest Policy

Subrecipients must have and comply with organizational, individual, and procurement conflict of interest policies.

##### Organizational Conflict of Interest

Subrecipients must not condition HOME-ARP Supportive Services assistance on a participant's acceptance of housing or another good or service owned by the Subrecipient, a parent company of the Subrecipient, or a subsidiary of the Subrecipient.

### Individual Conflict of Interest

The individual conflict of interest regulations prohibit financial gain for self, family, or those with businesses. No person who exercises responsibility over HOME-ARP Supportive Services funds or who is in a position to participate in a decision-making process or gain inside information with regard to HOME-ARP Supportive Services funds may:

- Obtain a financial interest or benefit from an assisted activity.
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity.
- Benefit from an assisted activity, either for themselves or for those with whom they have family or businesses, during their tenure or during the one-year period following their tenure.

### Procurement Conflict of Interest

In the procurement of property and services, the conflict-of-interest provisions of [2 CFR Part 200, Subpart D](#) apply. These regulations require Subrecipients to maintain written standards governing the performance of their employees engaged in awarding and administering federally funded contracts. At a minimum, these standards must:

- Require that no employee, officer, agent of the Subrecipient participate in the selection, award, or administration of a contract supported by HOME-ARP Supportive Services funds if their participation would create a real or apparent conflict of interest.
- Require that Subrecipient employees, officers and agents not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.
- Stipulate provisions for penalties, sanctions, or other disciplinary actions for violations of standards.

Any Subrecipient who violates the above will be required to repay to the HOME Consortium / Waukesha County any HOME-ARP Supportive Services funds disbursed for which there is an identified conflict of interest unless an exception is granted by Waukesha County.

### 7. Contractual Responsibility:

Subrecipients must maintain primary responsibility for all contractual issues. Program delivery may not be subcontracted out without permission from Waukesha County / The HOME Consortium. If a Subrecipient decides to subcontract, they must ensure all program requirements identified in the Subrecipient's grant agreement and program application are included in the terms and conditions of any subcontract. A

Subrecipient must also monitor their sub-recipient at least once during the performance period to check for compliance. This monitoring must include a review of participant files, procedures, policies, and financials.

#### 8. Drug Free Workplace Policy

Each Subrecipient is required to have a Drug Free Workplace Policy and procedures to carry out the policy. The policy must include that the contracting or granting agency (Waukesha County) will be notified within 10 days after the Subrecipient receives notice that a covered employee (an employee supported with grant funds) has been convicted of a criminal drug violation in the workplace.

#### 9. Equal Access

Subrecipients must have policies and practices to ensure participants have equal access to services as required under Wisconsin's civil rights laws. [Financial Management](#)  
All funding sources from Waukesha County are to be tracked separately. Payroll expenses should include documentation from timesheet to paycheck. Timesheets should show how time was spent on HOME-ARP Supportive Services eligible activities vs. other non-HOME-ARP activities. The Subrecipient should establish policies and procedures for keeping backup documentation on expenditures so it can be produced upon request.

#### 10. Financial Statements

The Subrecipient is required to provide access to financial statements and expenditure records upon request by representatives of Waukesha County / the HOME Consortium, and HUD.

#### 11. Monitoring

The Subrecipient shall comply with monitoring visits and/or desk monitoring from representatives of Waukesha County / the HOME Consortium and HUD to ensure HOME-ARP Supportive Services program compliance.

#### 12. No Faith Based Activities Requirements or Religious Influence

All HOME-ARP Supportive Services funded activities must be administered in a manner that is free from religious influences and in accordance with the following principles:

- Subrecipients must not discriminate against any employee or applicant for employment and must not limit employment or give preference in employment to persons based on religion.
- Subrecipients must not discriminate against any person applying for shelter or services and must not limit shelter or services or give preference to persons based on religion.
- Subrecipients must provide no religious instruction or counseling, conduct no

religious worship or services, engage in no religious proselytizing, and exert no other religious influence in the provision of programs or services funded under the HOME-ARP Supportive Services program.

- If a Subrecipient conducts these activities, the activities must be offered separately in time or location from the programs or services funded under the HOME-ARP Supportive Services program, and participation must be voluntary for HOME-ARP Supportive Services program participants.

### 13. PRWORA Act

Subrecipients must administer their Supportive Services Programs in accordance with all applicable immigration restrictions and requirements, including the eligibility and certification requirement that apply under title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, as amended (8 U.S. C. 1601-1646) (PRWORA) and any applicable requirements that HUD, the Attorney General, or the U.S. Citizenship and Immigration Services may establish from time to time to comply with PRWORA, Executive Order 14218 or other Executive Orders or immigration laws. Subrecipients will not use HOME ARP Supportive Services funding in a manner that by design or effect facilitates the subsidization or promotion of illegal immigration or abets policies that seek to shield illegal aliens from deportation. Unless excepted by PRWORA, Subrecipients must use SAVE, or an equivalent verification system approved by the Federal government, to prevent any Federal public benefit from being provided to an ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.

### 14. Non-Discrimination Policy for Participants & Employees

Each Subrecipient must have a policy expressly stating that discrimination against participants/potential participants and employees/potential employees is illegal and will not be tolerated. The policy should outline a way for participants/potential participants and employees/potential employees to report discrimination, and potential repercussions for those who engage in discrimination.

### 15. Recordkeeping and Retention

Subrecipients must retain all program files and records (including participant files) for a minimum of five (5) years after the end of the grant agreement period of performance. All files must be available for review or audit upon request from Waukesha County and HUD.

### 16. Residency



The Subrecipient shall not require individuals or families experiencing homelessness to be residents of the State of Wisconsin or locality to receive support services, nor shall the Subrecipient set differing allowed lengths of stay based on whether an individual or family experiencing homelessness are residents of the State of Wisconsin or locality.

#### 17. Signing Authority Documentation

Each Subrecipient must have documentation naming the person or persons who have signing authority for their organization.

#### 18. Trauma-Informed Care Practices

Recognizing that most HOME-ARP Supportive Services participants have experienced a variety of traumas, each Subrecipient is required to have trauma-informed care practices in place. Trauma-informed care practices are defined as an approach to intervention and providing services that focuses on how trauma may affect an individual's life and their response to receiving services in various systems. All Subrecipients are expected to provide training to their staff on trauma-informed care practices.

#### 19. Maximum Term of Service Policy

Program participants are not required to accept supportive services as a condition of occupancy or tenancy and may request services at any time during occupancy or tenancy subject to availability as well as HOME-ARP Supportive services time limitations. Changes in income do not impact a participant's status as a Qualifying Population. Once a household qualifies as a Qualifying Population household, they hold that status and must be served in the HOME-ARP Supportive Services program until the earlier of June 30, 2030, or until the individual or family:

1. Voluntarily terminates HOME-ARP supportive services; or
2. Obtains needed supportive services from another source.

Otherwise, maximum service periods may be determined by the organization and must apply to all participants once they are designated as a Qualifying Population. A maximum term of service policy will be required for all Subrecipients.

## Chapter 5: Financial Management

### 1. Tracking of Funds

All funding sources from Waukesha County / the HOME Consortium are to be tracked separately. While all QP households are eligible to receive all supportive services, Subrecipients are required to track each of the three (3) categories of supportive services separately. McKinney-Vento and Homelessness Prevention funds will be awarded together because they can cover the same eligible costs. However, as these funds are spent, they must be tracked as to whether the funds are providing McKinney-Vento services or Homelessness Prevention services based on the type of QP household being assisted. If a QP1 household is being assisted, these funds should be tracked as McKinney Vento services. If a QP2, QP3 or QP4 household is being assisted these funds should be tracked as Homelessness Prevention services. Housing Counseling funds will be awarded separately, and regardless of the QP household type they should be tracked as Housing Counseling funds.

The cost of providing direct services to the client, including the salary and fringe benefits for staff working directly with program participants, should be charged to the appropriate supportive service funds as outlined above.

Subrecipients are required to provide access to financial statements, charts of accounts, and expenditure records upon request by representatives of Waukesha County and HUD.

### 2. Audit

Subrecipients who receive over \$1,000,000 in federal funding annually shall have a certified annual audit performed utilizing generally accepted accounting principles and generally accepted auditing standards. Audit reports are due to Waukesha County within the earlier of thirty (30) calendar days after receipt of the auditor's report(s), or nine (9) months after the end of the audit period.

## Chapter 6: Quarterly Funds Disbursement & Financial Updates

Subrecipients may draw on HOME-ARP Supportive Services funds as reimbursement of expenditures. To initiate each payment, Subrecipients must complete and submit the HOME-ARP Payment Request form.

Subrecipients are allowed to submit monthly, for the previous month's expenses. Subrecipients must submit at least one (1) Payment Request every quarter.

Waukesha County reserves the right to not process Payment Requests until Quarterly Reports have been submitted. Quarterly Reports are due with the submission of the Payment Request for the last month in the quarter's expenses, whether the Subrecipient is submitting Payment Requests quarterly or monthly. Waukesha County reserves the right to change this policy.

Quarterly Reports are due each quarter regardless of whether the Subrecipient is submitting a Payment Request or has already exhausted all funds.

Payment Requests and Quarterly Reports must be submitted by email to [lmjohnson@waukeshacounty.gov](mailto:lmjohnson@waukeshacounty.gov). The subject of the email should follow the below format:

HOME-ARP, Subrecipient Name, Quarter or Month/Year of Payment

Subrecipients must submit final Payment Requests and Reports within sixty (60) days of the performance period end date of their grant agreement or termination thereof, whichever comes earlier. Payment Requests submitted after sixty (60) days of the performance period end date of their grant agreement or termination thereof will not be processed.

## Chapter 7: Reporting

Subrecipients are required to submit quarterly reports to Waukesha County which must be received on or before the tenth (10th) of the month following the close of the quarter.

Waukesha County reserves the right not to process payment requests until the quarterly reports have been submitted.

Subrecipients are also required to submit a Grant Year-End Report within sixty (60) days of the performance period end date of their grant agreement or termination thereof, whichever comes earlier.

Reporting is required for the entire performance period. This requirement is not dependent on when the Subrecipient requests funds. Subrecipients are required to submit quarterly reports for the entirety of the HOME ARP grant period. Waukesha County reserves the right to require additional information or reports as needed. All reporting should be sent to [lmjohnson@waukeshacounty.gov](mailto:lmjohnson@waukeshacounty.gov).

Below are the current required datapoints for each report:

### 1. Quarterly Reporting

Subrecipients must submit Quarterly Reports on the following services provided:

The number of homeless and not homeless households assisted by the following data points:

- (1) Total number of households (plus # of new households and # of Veteran households);
- (2) Race and ethnicity of household (Hispanic, White, Black, Asian, American Indian/Alaskan Native, Native Hawaiian/ Pacific islander, Other/Multi-Racial);
- (3) Household Size (1—8+)
- (4) Household type (single non elderly, elderly, single parent, two parent, other)
- (5) Qualifying Population (QP 1, 2, 3 or 4)
- (6) Reason for exiting program (if applicable); (chose to exit, terminated, reached max, left for long term care facility, jail/prison greater than 30 days, deceased)

The HOME ARP Supportive Services Quarterly Reporting Form will be available on the Waukesha County Community Development website and emailed to Subrecipients after contracts are fully executed.

## Chapter 8: Annual Monitoring

Waukesha County will monitor the performance and requirements compliance of each Subrecipient on a semi-annual basis. During the monitoring process, Subrecipients should expect Waukesha County to request all the documentation as outlined in [Chapter 3: Program Requirements](#), [Chapter 4: Administrative Requirements](#), and in [Chapter 5: Financial Management](#) of this Program Manual. The monitoring may be conducted either onsite or via desk monitoring. Waukesha County reserves the right to change these monitoring requirements.

## Chapter 9: Operating Funds

HOME ARP funds may be awarded to pay operating expenses for nonprofit organizations that will carry out activities with HOME-ARP funds. These awards are a one-time award that does not renew annually.

Operating expense assistance is defined as reasonable and necessary costs of operating the nonprofit organization. Eligible costs include:

- Employee salaries, wages and other employee compensation and benefits
- Employee education, training and travel
- Rent
- Utilities
- Communication costs
- Taxes
- Insurance
- Equipment, materials, and supplies.

HOME-ARP funds used for operating expenses must be used for the “general operating costs” of the nonprofit organization. These operating costs must not have a particular final cost objective, such as a project or activity, or must not be directly assignable to a HOMEARP activity or project.

For example: HOME-ARP funds for operating expenses may not be used for staffing costs to provide supportive services or develop HOME-ARP-rental housing (as operating costs to develop HOME-ARP rental housing are paid for by a developer fee which is a project delivery or soft cost).

In any fiscal year, operating assistance provided to a nonprofit organization may not exceed the greater of 50 percent of the general operating expenses of the organization for that fiscal year, as described above, or \$50,000

## Chapter 10: Capacity Building Funds

HOME-ARP funds may be used to provide capacity building assistance to nonprofit organizations. Capacity building expenses are defined as reasonable and necessary general operating costs that will result in expansion or improvement of an organization's ability to successfully carry out eligible HOME-ARP activities.

Eligible costs include:

- Salaries for new hires including wages and other employee compensation and benefits
- Employee training or other staff development that enhances an employee's skill set and expertise
- Equipment (e.g. computer software or programs that improve organizational processes), upgrades to materials, and supplies
- Contracts for technical assistance or for consultants with expertise related to the HOME-ARP qualifying populations.

In any fiscal year, capacity building assistance provided to a nonprofit organization may not exceed the greater of 50 percent of the general operating expenses of the organization, as described above, or \$50,000.

If an organization receives both operating assistance and capacity building assistance in any fiscal year, the aggregate total amount of assistance it may receive is the greater 50 percent of the organization's total operating expenses for that fiscal year or \$75,000