

CITY OF KENOSHA HOME-ARP Allocation Plan

March, 2023



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Introduction

The City of Kenosha (hereinafter “City”) received a one-time \$1.9 million allocation of HOME Investment Partnerships Program funding, known as HOME-ARP¹, from the United States Department of Housing and Urban Development (HUD).

Members of organizations that may be a potential beneficiary of the funding were invited to provide input through an online survey, along with several public hearings. Both the survey and public hearings, as well as any written comments, helped the City identify priorities for funding, as well as the process used to distribute the funding.²

The funding is part of a \$5 billion commitment in the American Rescue Plan Act of 2021 specifically targeted to reduce homelessness in communities to provide housing, services and shelter to individuals experiencing homelessness and other vulnerable populations.

Funds must be used to primarily benefit individuals and households in the following qualifying populations:

- Those experiencing homelessness
- Those at risk of becoming homelessness
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking
- Other populations with high risk of housing instability (including low-income households and high cost-burdened households; those that have moved two or more times in the last 60 days; and those that are living in a hotel/ motel.

The City’s Allocation plan includes comments and data provided through consultation with organizations that represent the qualifying populations. The plan also includes an analysis of data, needs of the qualifying populations, as well as any identified gaps in the City’s housing and service systems. Finally, the plan identifies priorities for funding and a proposed distribution of the \$1.9 million dollars of HOME-ARP funds awarded to the City.

¹References to “HOME-ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

²Requirements for the HOME-ARP allocation plan are described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*.

Consultation

In accordance with Section V.A of the Notice the City was required to consult with a wide range of stakeholders, including:

- CoC(s) serving the Kenosha 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.

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

The City was required to consult with a wide range of service providers. Consultation was through letters, emails and phone calls, as well invitations to participate in an online survey and an informational meeting held on January 10, 2023. Sixty-seven persons answered the online survey and twenty-two individuals attended the informational meeting. Through emails and letters, the City consulted with over 100 individuals and organizations. Finally, stakeholders and other interested community members were invited to comment on the draft allocation plan starting on January 27, 2023 and concluding on February 27, 2023.

Table 1: Organizations Consulted

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
AIDS Resource Center	Agency serving needs of qualifying population, COC	Letter, email	None received
Bear Real Estate Group	Developer	Letter, email	None received
Bridges Community Center	Service Provider	Letter, email	None received
Catholic Charities	COC	Letter, email	None received
City of Kenosha Housing Authority	Public Housing Authority, COC	Letter, email, phone call, Informational meeting	Data provided, comments made at Informational meeting, email consultation
CUSH (Congregations United to Serve Humanity)	Civil Rights Organization/ Homelessness Advocate, COC	Letter, email	None received
Disability Rights - Wisconsin	Disabilities Rights Organization	Letter, email	None received
Division of Veteran's	Veteran's	Letter, email, phone	Comments made at Informational

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Services	Organization	call, Informational meeting	meeting
ELCA Outreach Center	COC	Letter, email, Informational meeting	Comments made at Informational meeting
Gorman and Company	Developer	Letter, email	None received
Grace Welcome Center	Service Provider	Letter, email	None received
Hope Council on Alcohol and Drug Abuse, Inc.	Service Provider	Letter, email	None received
Horizon Management Services, Inc.	Developer, Service Provider	Letter, email, phone call, Informational meeting	Comments made at Informational meeting, phone call and emails
Housing Resources, Inc	Service Provider	Letter, email	None received
Kenosha Area Family and Aging Services	Agency serving needs of qualifying population, Service provider	Letter, email	None received
Kenosha Community Health Center	COC, Agency serving needs of qualifying population	Letter, email	None received
Kenosha County Division of Health	COC, Agency serving needs of qualifying population	Letter, email, Informational meeting	Comments made at Informational meeting.
Kenosha County Division of Workforce Development	COC, Service Provider	Letter, email	None received
Kenosha Human Development Services	COC, Agency serving needs of qualifying population	Letter, email, phone call, Informational meeting	Comments made at Informational meeting and provided via email
Kenosha Landlord Association	Agency serving needs of qualifying population	Letter, email	None received
Kenosha Police Department	COC	Letter, email	None received
Kenosha Unified School – Homeless and Displaced Program	Homeless Services	Letter, email	None received
Legacy Varin Property Management, LLC	Developer	Letter, email	None received
Legal Action of Wisconsin	COC, Agency serving needs of qualifying population	Letter, email	None received
Movin' Out, Inc.	Disabilities Right's	Letter, email	None received

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
	Organization		
NAACP	Civil Rights Organization	Letter, email	None received
NAMI Kenosha County	Agency serving needs of qualifying population	Letter, email	None received
New Song Ministries, Inc.	Service provider	Letter, email	None received
Prevention Services Network	COC, Homeless Services, Agency serving needs of qualifying population	Letter, email	None received
Racine/ Kenosha Community Action Agency	COC, Service provider, Agency serving needs of qualifying population	Letter, email	None received
Salvation Army	COC, Homeless Services, Agency serving needs of qualifying population	Letter, email, Informational meeting	Comments made at Informational meeting
Society's Assets	Agency serving needs of qualifying population	Letter, email	None received
The Shalom Center	Homeless Service Provider, COC	Letter, email, Informational meeting	Comments made at Informational meeting, email consultation
United Way of Kenosha County	COC, Agency serving needs of qualifying populations	Letter, email	None received
Urban League of Racine/ Kenosha	Agency serving needs of qualifying populations	Letter, email, Informational meeting	Comments made at Informational meeting
VORP – Veteran's Outreach and Recovery Program	Veteran's Organization	Letter, email	None received
Walkin' in My Shoes	Homeless Service Provider, COC	Letter, email	None received
Women and Children's Horizons	Domestic Violence Service Provider, Homeless Service Provider, COC	Letter, email	Emailed data/ comments

Summarize feedback received and results of upfront consultation with these entities:

Comments received through consultation include the following:

- some persons are remaining in nursing homes and receiving more care than needed due to inability to find accessible units;
- there is a problem with landlords who will accept Section 8 vouchers and who charge too high of rents;
- there were 1,235 calls for motel vouchers in 2022;
- there are 1,500 individuals on the Section 8 wait list;
- great need for accessible units;
- mental health services and case management are important to help transition and stay off the streets;
- there was a 115%-120% increase in competitive rental rates;
- availability of rental units for persons with one eviction;
- consideration of a Veteran's tiny home village similar to Racine;
- Veterans are coming to Wisconsin from Illinois;
- landlords who update units and raise rents that lead to unjust evictions; and
- Fair market rents are higher since Kenosha is included in the Chicago rental market.
- Additional case management is needed for the Emergency Motel Voucher Program.
- More funding should be allocated to Tenant-based Rental assistance. More vouchers will help free up shelter beds and reduce the length of time for homelessness.

All comments provided are included in the Appendix.

Public Participation

In accordance with Section V.B of the Notice, the City was required to provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, the City is required to provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The City must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, the City was required to hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

The City is required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the City was required to follow 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 are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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 - 2/27/2023
- ***Date(s) of public hearing:***
2/07/2023 – HOME Program Commission
3/06/2023 – Finance Committee
3/06/2023 – Common Council

Describe the public participation process:

The City included multiple opportunities for the public to participate in the development of the HOME-ARP Allocation Plan. A press release inviting the public and stakeholders to complete an online survey was released by the City on November 14, 2022 and shared with local media, including the Kenosha News, the City of Kenosha website and other local media. The online survey was available through December 31, 2022. There were a total of 67 persons who responded to the survey. The survey results are included in the Appendix.

The City also held an informational meeting with stakeholders and other interested community members on January 10, 2023 at the Kenosha Public Museum. Attendees provided comments and recommendations for activities to fund with the HOME-ARP funds.

A second press release was published on January 27, 2023 in the Kenosha News to invite the public and stakeholders to review the draft Allocation plan and to provide comments to the City by February 27, 2023 in order to be considered for the final plan.

Finally, the City held public hearings at the February 7, 2023 HOME Program Commission and the March 6, 2023 Finance Committee and Common Council meetings.

Describe efforts to broaden public participation:

The City provided several opportunities for public participation. The public had the opportunity to attend one of three public hearings. Those who could not attend the public hearings could comment on the proposed allocation plan through written comments. Input was also able to be provided through the online survey. The draft allocation plan is available both online through

the City's website or at the Department of City Development during the public comment period.

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

Comments were predominantly that Kenosha has a lack of affordable housing units, especially those available to those households that were at 30 percent of the area median income. Another comment noted that current property owners had bought up housing units from previous landlords who were affected by the COVID pandemic where some tenants stopped paying rent. The new property owners raised rents, further diminishing the availability of affordable housing units for qualifying populations.

It was also noted that any affordable housing units developed for the qualifying populations should have integrated services to ensure housing stability.

Summary of Online Survey Results:

- Organizations representing qualifying populations participated, along with other interested community members
- Top priority for funding was *Development/ Preservation of Affordable Rental Housing, including transitional housing*, followed by *Acquisition/ Development of Non-Congregate Shelter, Tenant-based Rental Assistance and Supportive Services*.
- Regarding *Supportive Services*, the highest priority was *Homelessness Prevention* services, followed by *Housing Counseling*
- *Case Management Services* was the highest priority for non-congregate shelters
- Over 66% favored *New Affordable Units and Transitional Housing for Rental Units*
- *Housing Assistance payments* was the highest recommended activity for *Tenant-based Rental Assistance*.

All public comments, including the full results of the online survey are provided in the Appendix.

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

There were not any public comments or recommendations that were not accepted by the City.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice, the City is required to evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the City does not evaluate the needs of one of the qualifying populations, then the City has not completed their Needs Assessment and

Gaps Analysis. In addition, the City must identify any gaps within its current shelter and housing inventory as well as the service delivery system. The City should use 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.

Table 2: Homeless Needs Inventory and Gap Analysis Table

Homeless													
	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	32	12	31	31	0								
Transitional Housing	6	2	2	2	0								
Permanent Supportive Housing	0	0	25	25	0								
Other Permanent Housing	22	6	18	18	0								
Sheltered Homeless						30	52	1	30				
Unsheltered Homeless						24	0	0	6				
Current Gap										0 (+6)		0 (+24)	

Data Sources: 2022-Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

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

Homeless as defined in 24 CFR 91.5

HUD defines *Homeless* in Section 103 of 42 USC 11302 of the McKinney-Vento Homeless Assistance Act as:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence;
- (2) 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;
- (3) 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 organizations or by federal, state, or local government programs for low-income individuals); or

(4) An individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;

(5) An individual or family who:

(A) will imminently lose their housing, including housing they own, rent, or live in with without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State or local government programs for low-income individuals or by charitable organizations, as evidenced by -

(i) a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;

(ii) the individual or family having a primary nighttime residence that is in a room in a hotel or motel and where they lack the resources to reside there for more than 14 days or;

(iii) credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;

(B) has no subsequent residence identified; and

(C) lacks the resources or support networks needed to obtain other permanent housing.

(6) 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:

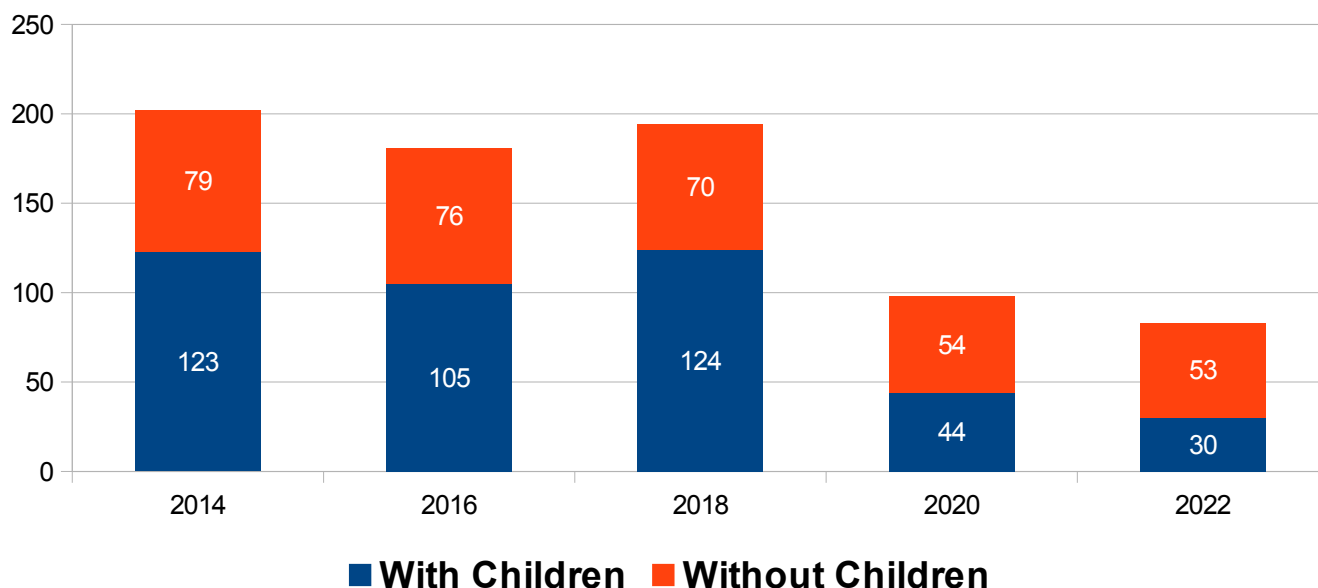
(A) have experienced a long term period without living independently in permanent housing;

(B) have experienced persistent instability as measured by frequent moves over such period; and

(C) 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, the presence of a child or youth with a disability, or multiple barriers to employment.

(7) 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 in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who no other residence and lack the resources or support networks to obtain other permanent housing.

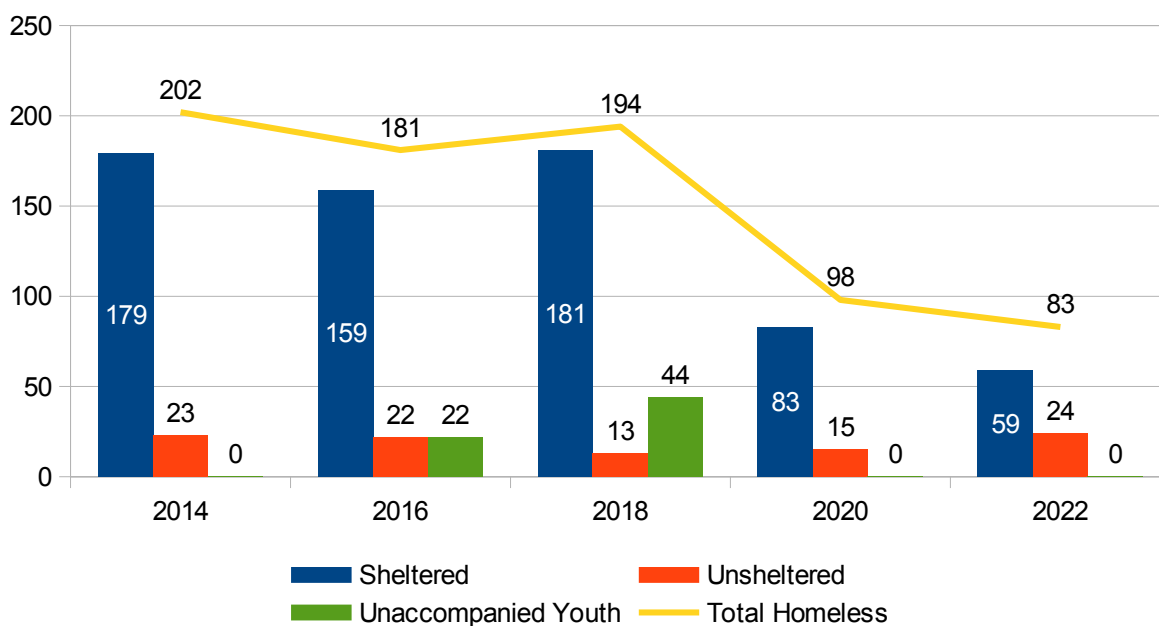
Exhibit 1: Sheltered and Unsheltered Homeless in Kenosha County



Source: Kenosha County Point in Time data, 2014 -2022

Data from the 2014 – 2022 Point-in Time survey for Kenosha County shows that the homeless population generally has been decreasing. In 2014 there were a total of 202 persons who were homeless with 123 individuals with children, or 61 percent. In 2022, a total of 83 individuals were homeless, with 30 individuals, or 36 percent, who included one or more children.

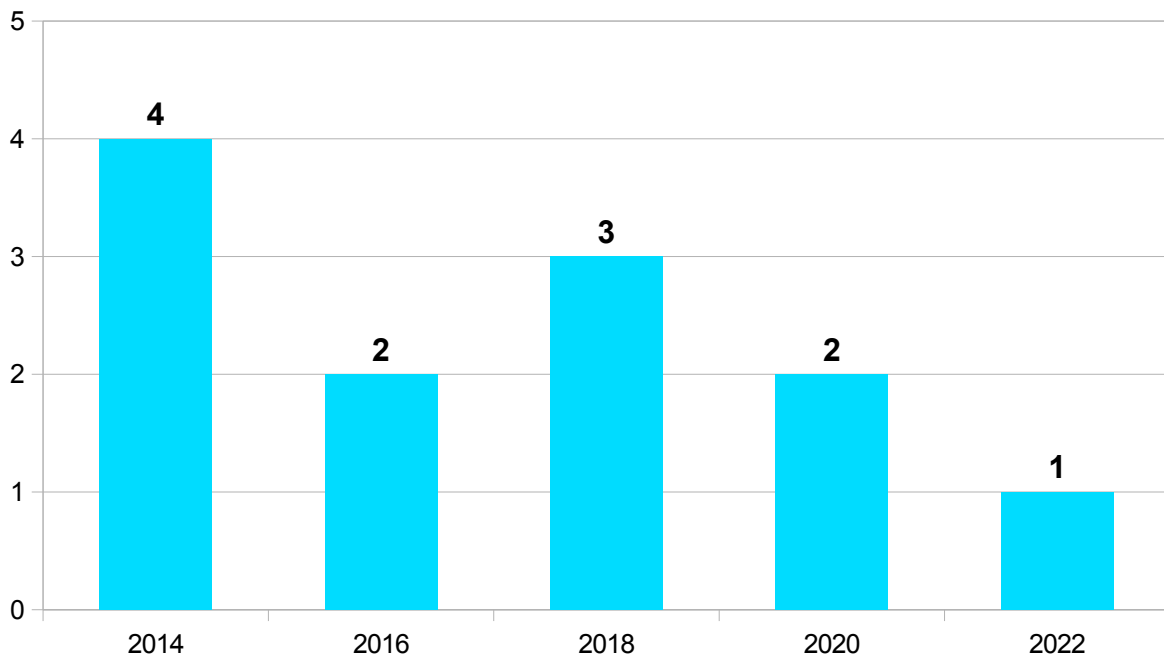
Exhibit 2: Homeless Population: 2014-2022



Source: Kenosha County Point in Time data, 2014 -2022

The *Homeless Needs Inventory and Gap Analysis Table* on page 7 indicates that there is not a gap in available beds, based on the 2022 Point-in Time survey. However the City also chose to analyze historical data on the homeless population from 2014 to 2022. That data shows a steady decrease, from a high of 202 homeless individuals in 2014, to 83 in 2022. The current number of beds available through emergency shelters, transitional housing, permanent supportive housing and other permanent housing total 136 beds. Between 2014 and 2018, the data shows there would be a gap of 2 beds in 2014, 98 beds in 2016 and 106 beds in 2018.

Exhibit 3: Homeless Vets



Source: Kenosha County Point in Time data, 2014 -2022

The Point-in Time data for homeless vets showed only a small number of Vets between 2014 and 2022, from four persons in 2014, to 1 person in 2022.

The Shalom Center in 2022 served 207 individuals. They also served 59 adults and 96 children in the family units.³

Regarding the 59 families with children, there were 34 White (2 Hispanic Origin), 23 African-American, 1 American Indian and 1 multi-race.

Of the individuals served in 2022, there were 138 White (43 Hispanic Origin), 57 African-American, 9 American Indian and 3 multi-race.

3 Data was provided through consultation with the Shalom Center

The Diversion program through the Shalom Center took 1,039 calls. Of those calls, 551 callers were diverted from coming into the shelter. Persons who were redirected include: stayed where they were; self-resolved; provided rental assistance through community partners; placed at another shelter closer to their location; didn't qualify for services under HUD's definition; or connected to other qualifying programs, such as Veteran's services, Racine-Kenosha Community Action Agency or prevention services. 93 persons of the 1,039 callers were provided shelter through the Shalom Center. The remaining 395 persons self-resolved, meaning they could not be reached or they stopped returning calls from the Shalom Center.⁴

At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines *at risk of homelessness* as:

(1) An individual or family who:

(A) has an annual income below 30 percent of median family income for the area, as determined by HUD;

(B) has insufficient resources immediately available to attain housing stability; and

(i) has moved frequently because of economic reasons;

(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;

(iv) lives in a hotel or motel;

(v) lives in severely overcrowded housing;

(vi) is exiting an institution; or

(vii) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

⁴ Data was provided through consultation with the Shalom Center

Table 3: Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	16,700		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	8,865		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,705		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,715	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,685	
Current Gaps			6,400

Data Sources: 1. 2021 American Community Survey (ACS); 2. 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

Table 3 uses data from the Comprehensive Housing Affordability (CHAS) to analyze renters between 0% and 30% of AMI that have one or more severe housing problems. This population group is at risk of becoming homeless, which is 3,715 renter households in the City.

Table 4: Occupied Housing Units

	Owner-Occupied	Renter-Occupied
White	19,628	11,215
African-American	622	2,891
Native American	102	105
Asian	263	380
Native Hawaiian/ Pacific Islander	12	17
Some Other Race	500	520
Two or More Races	1,046	2,338

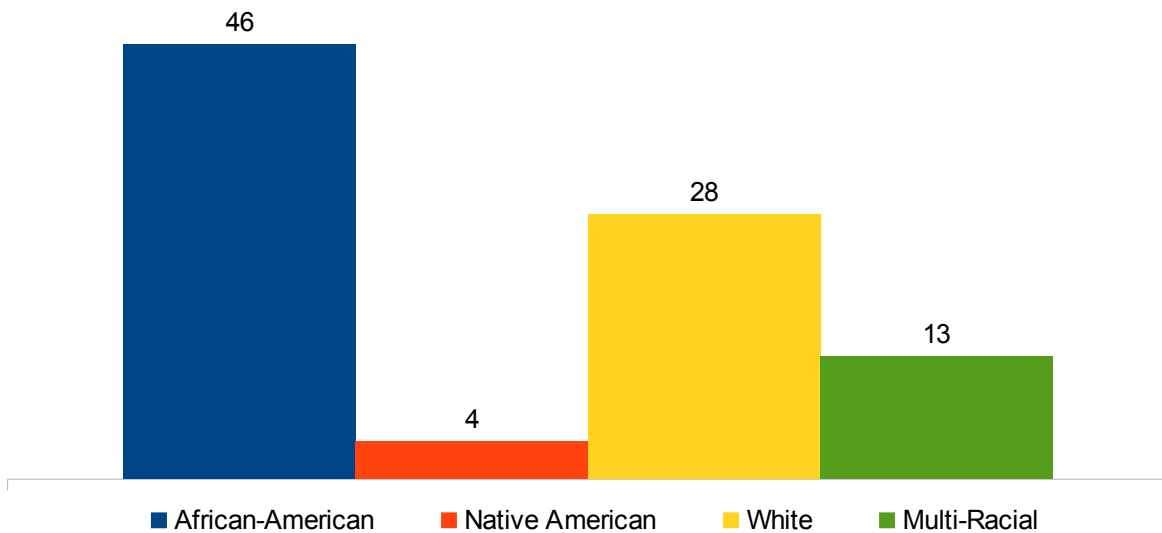
Data Source: 1. 2021 5-year Estimates American Community Survey (ACS)

Table 4 shows owner and renter-occupied housing by Race. All non-White races have a higher percentage of households who rent.

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

HUD defines this qualifying population to include 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.

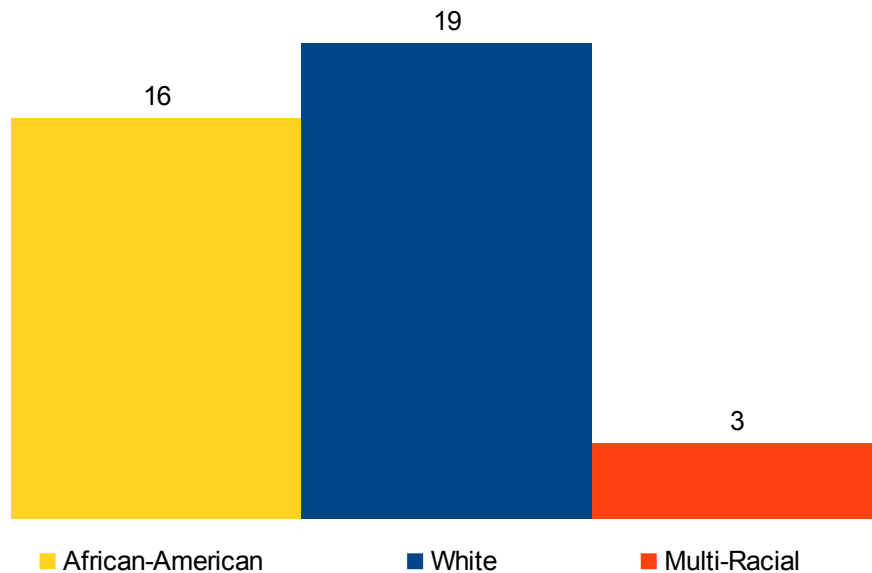
Exhibit 4: Domestic Violence Individuals With At Least One Child



Source:: Consultation with Women and Children's Horizons

Consultation with Women and Children's Horizons noted that there were 91 families with at least one child who entered their shelter or into transitional housing in 2022. African American families represented the highest population with 51%, followed by White families at 31%. Hispanic families represented 22 percent.

Exhibit 5: Domestic Violence Individuals Without Children



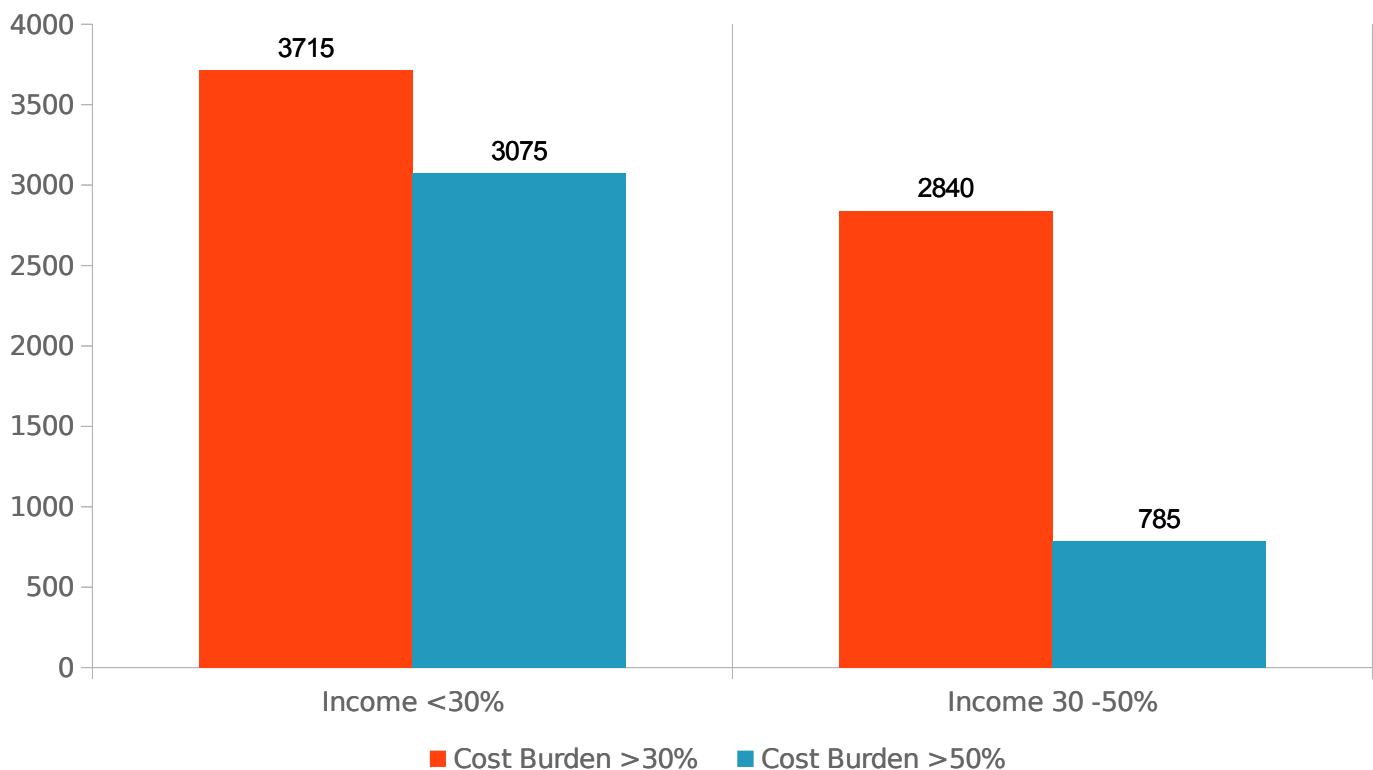
Source: Consultation with Women and Children's Horizons

For individuals without children, White individuals represented the highest percentage of those who were provided services in 2022, representing 50 percent. African-American individuals were 42 percent, followed by Multi-Racial at 8 percent. Twenty-nine percent of all individuals were Hispanic.

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

HUD defines other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability to include: households who have previously been qualified as homeless, households who are currently housed due to temporary or emergency assistance, and households who need additional housing assistance or supportive services to avoid a return to homelessness. Those at greatest risk of housing instability include households with annual income less than or equal to 30% of the AMI and experiencing severe cost burden (>50% of income on housing costs) or households with annual income less than or equal to 50% of the AMI and meeting a condition that puts them at risk of homelessness.

Exhibit 6: Cost Burden



Source: Comprehensive Housing Affordability Strategy (CHAS), 2015-2019 American Community Survey (ACS)

Data was analyzed for City renters with both 30% and 50% of Kenosha's Area Median Income limit (AMI). Eighty-three percent of renters at 30% or less of the AMI, or \$26,850 for a family of 4 persons, paid more than 30% of their household income towards rent. Eighty-seven percent (87%), or 3,075 households had a severe housing cost burden and paid more than 50% of their household income towards rent.

Sixty-four percent (64%) of renters, or 2,840 households with an income between 30 and 50 percent of Kenosha's AMI (\$44,750 for a family of 4 persons) paid more than 30% of their income towards rent, while 785 households (22%) pay more than 50% of their income.

Table 3 shows the gap in affordable rental units in the City. Based on the 2015-2019 CHAS data, there is a shortage of 6,400 affordable rental units in the City.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

A number of resources are currently available to assist qualifying populations. The Shalom Center provides temporary emergency shelter for homeless families and individuals. The

Shalom Center has 54 shelter beds for individuals. There are also 8 individual rooms for families, along with a full size kitchen, bathroom and shower facilities.⁵ Resources provided by the Shalom Center include a food pantry, soup kitchen and wrap-around support services such as: financial workshops and training, job training, mentoring and support, access to legal services, life skills workshops, volunteer and employment opportunities, access to mainstream programs and parenting and nurturing workshops.

Women and Children's Horizons provides emergency and transitional housing for victims of domestic violence, including men. The shelter has 11 rooms that can host up to 38 individuals. Those who cannot be provided shelter are provided hotel vouchers. They also have access to 14 transitional housing units, where the average lease is twelve to eighteen months.

The Kenosha Housing Authority provides housing choice vouchers (Section 8) to members of the qualifying population. The Housing Authority receives funding the HOME Program Tenant-based Rental Assistance Program (TBRA) and currently provides rental assistance to 22 Senior households. Both the Section 8 and TBRA programs pay the difference between approximately 30 percent of the household's income and the total rent.

Kenosha Human Development Services (KHDS) is the lead organization for Kenosha County's Continuum of Care (COC). Services provided include: 24 hour crisis intervention, access to transitional, permanent housing and emergency shelter and a community resource center.

The Salvation Army provides a food pantry, utility and rental assistance, transportation assistance and access to an adult rehabilitation facility.

The Grace Lutheran Welcome Center provides a food pantry, hot meals, access to showers and haircuts and clothing to the homeless, near homeless or low-income individuals and families living in or near the Uptown Neighborhood.

The ELCA Outreach Center provides adult and job skills training, clothing, resume assistance, access to professional attire for job interviews, legal advice, hygiene items and referrals to other assistance programs.

Additional assisted housing in the City includes Low Income Housing Tax Credit (LIHTC) properties, and other Federally-assisted properties.

5 Data was provided through consultation with the Shalom Center

According to WHEDA's LIHTC database, there are fourteen (14) tax credit properties in the City that provide 1,117 units of affordable housing to households with incomes at or below 60% AMI. Of the LIHTC properties, there are 657 Elderly units, 311 Family units and 149 Other units.⁶

There is one tax credit property currently under construction in the City. Uptown Lofts will provide 71 additional family units.⁷

Other multifamily properties include housing developed through HUD's Section 202 program, which provides affordable supportive housing for seniors. Section 202 Supportive Housing for the Elderly provides units to very-low income households with at least one person 62 years of age or older. There is currently one Section 202 property in the City, providing 60 units of affordable housing.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The gap analysis for the current number of beds compared to the 2022 Point-in time survey data showed that there currently is not a gap in available beds. However, as pointed out in the historical data from 2014 to 2018, there was a gap of up to 106 beds. Due to not having a gap at this time, the City will not propose to provide funding for *Acquisition and Development of Non-Congregate Shelters*. However, there is a noted gap for *Services*, so funding is proposed, especially to compliment any *Development of Affordable Rental Housing*.

At Risk of Homelessness as defined in 24 CFR 91.5

The population most at risk of becoming homelessness are those individuals who are paying more than 50% of their income towards rent, especially renters who are at or below 30% AMI. However, as defined, any household who is at or below 30% AMI and pays more than 30% of their income towards housing costs is at risk of becoming homeless. Figure 6 shows that there are 3,715 renters at or below 30% AMI who are paying more than 30% of their income towards rent.

Stakeholders did make several comments regarding the tremendous demand for hotel and motel vouchers, which are a short term solution. The City proposes to fund transitional housing units as a means to help reduce the amount of reoccurrence of homelessness. Together with supportive services, the hope is that persons in transitional housing units following a Shelter or motel/ hotel stay will have a higher success rate of finding permanent affordable housing.

6 Information from wheda.com

7 Information on file at City of Kenosha Department of City Development

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

Women and Children's Horizons identified that their shelter is usually at capacity and sometimes they have to turn away persons. In those cases, a hotel voucher or referral to another shelter is provided. It was also noted in comments made by other organizations that there is a great demand for motel and hotel vouchers. This organization also noted that 19 families or individuals utilized transitional housing units, following their shelter stay. The addition of four additional transitional units that are developed with HOME-ARP funds could benefit this qualifying population.

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

As of January 24, 2023, there are 1,112 households assisted with Section 8 financial assistance for rents through the Kenosha Housing Authority. Another 21 Elderly households received HOME Program tenant-based rental assistance. There are also 24 mainstream vouchers, 20 emergency housing vouchers, 13 Veterans Affairs Supportive Housing (VASH) vouchers, 33 Family Unification Program (FUP) vouchers, 45 Family Self-Sufficiency (FSS) vouchers and 7 families utilizing the Housing Choice Voucher homeownership program.

The Kenosha Housing Authority accepted online applications for the current Section 8 Wait List on August 24, 2022. During the twelve hours that applications were accepted, 3,649 persons applied for assistance. Following the application period, 1,565 applications were randomly selected for the current Wait List.⁸

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

As noted through consultation with stakeholders, the predominant problem with the housing inventory in the City is a lack of affordable housing units.

Housing problems also include:

- (1) long waiting list for Section 8 housing choice vouchers;
- (2) landlords who continually raise rents and are unwilling to rent to the qualifying populations, especially those that have credit issues or evictions;
- (3) families who are doubled up;
- (4) housing located in undesirable locations; and
- (5) not being located near a bus line that provides transportation to their work place.

⁸ Data was provided through consultation with the Kenosha Housing Authority

Other populations may be overlooked such as: foster care youth over age 18; domestic violence survivors who do not meet the current definition of domestic violence (not fleeing or actively fleeing); renters who are behind on rent but not yet served an eviction notice; and individual or families residing with friends and family for more than 180 days.

Within the service delivery system, access to health care, especially mental health-care, continues to be a challenge, due to a lack of staffing.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, the City may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Housing instability and increased risk of homelessness can be analyzed by reviewing HUD’s identification of four housing problems including:

- **Cost burden:** A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- **Overcrowding:** A household is overcrowded if there is more than one person per room, not including kitchens and bathrooms.
- **Lack of complete kitchen facilities:** A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
- **Lack of complete plumbing facilities:** A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

The City has identified that cost burden is a common housing problem. Eighty-three percent of renter households earning below 30% AMI (\$26,850⁹) are cost burdened, paying more than 30% of their income towards housing costs. Sixty-seven percent of these households pay more than 50% of their income towards housing costs and are identified as having severe housing costs.

9 4-person Extremely Low-income Household Income limit for Kenosha County in 2022

Sixty-four percent of renter households earning between 30% and 50% of AMI (\$44,470¹⁰) are cost burdened, paying more than 30% of their income towards rent. Twenty-two percent of these households are severely cost burdened by paying more than 50% of their income towards housing costs.

Identify priority needs for qualifying populations:

Priority needs include the following:

- Affordable housing, especially for those households who are at 30 percent of Kenosha County Area Median Income limit (AMI) and are paying more than fifty percent of their income towards housing costs.
- Homelessness prevention services, especially rent and security deposit assistance
- Supportive services in conjunction with development or rehabilitation of affordable transitional housing units.
- Transitional housing units

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

The City reviewed data from the 2022 Point-in-Time for Kenosha County and the Housing Inventory counts. These data sources helped to determine the level of needs and to determine any gaps in the housing inventory and service delivery systems.

In 2022, there were 87 individuals identified in the Point-in-Time who were homeless in Kenosha County. During this time period, there were 63 emergency beds, 8 transitional beds, 25 permanent supportive housing beds, 81 rapid rehousing beds and 40 other permanent housing beds available.¹¹ Based on this data, there does not appear to be a gap. However, other factors, such as an economic recession that leads to loss of employment, could rapidly overwhelm emergency shelters and transitional or rapid-rehousing units.

Additionally, consultation with Women and Children's Horizons noted that they currently have 14 domestic violence rapid-rehousing units that are all occupied. They also pointed out that there is a long waiting list through the Kenosha County section of the Wisconsin Balance of State COC.¹²

10 4-person Very Low-income Household Income limit for Kenosha County in 2022

11 Consultation with Kenosha Human Development Services, data provided from 2022 Housing Inventory Count Report

12 Consultation with Women and Children's Horizons. The 14 rapid rehousing units are part of the 81 total rapid rehousing units identified in the 2022 Housing Inventory Count Report.

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:

Applications will be accepted on a first come, first served basis following approval of the City's Allocation plan. Applications will be accepted until no further funding is available.

Describe whether the City will administer eligible activities directly:

The City may implement the *Development of Affordable Housing Units* (transitional housing units). The City will also partner with subrecipients and developers to administer eligible activities identified in the Allocation Plan.

If any portion of the City's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the City's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the City's HOME-ARP program:

The City will not provide administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice, the City must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$442,944.50		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$226,380.00		
Development of Affordable Rental Housing (Transitional Housing Units)	\$1,000,000.00		
Non-Profit Operating	\$0.00	%	5%
Non-Profit Capacity Building	\$98,195.50	5 %	5%
Administration and Planning	\$ 196,391	10 %	15%
Total HOME ARP Allocation	\$ 1,963,911.00		

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

The highest priority for distribution of the City's HOME-ARP fund will be for *Development of Affordable Housing Units*. Throughout the process of consultation with stakeholders and interested community members, the availability of affordable housing units was identified as one of the top needs for the qualifying populations. Furthermore, consultation with Women and Children's Horizons revealed that all of their transitional housing units are full and there is a long waiting list for additional units.

Based on the identified priority needs, the City proposes use of these funds will be through the development of single-family or two-family transitional housing units that compliment the architectural style of the surrounding neighborhood. Funding for this activity may include acquisition, rehabilitation of existing housing units or new construction.

Consultation also revealed that it was extremely important to include wrap-around supportive services in conjunction with any development of affordable housing units to ensure housing stability for these vulnerable populations.

In addition to development of affordable housing units and supportive services, tenant-based rental assistance was also identified as a vital need. Based on an estimated payment of \$857.50 per month (70% of the 2022 payment standard of \$1,225 for a two-bedroom unit¹³), it is estimated that ten households could be assisted for up to two years with the funding allocation.

Consultation with stakeholder organizations also revealed that there is a need for funding to help support an increase in supportive service staffing that could support an expansion of supportive services. The Allocation Plan provides funding to these organizations through the provision of funding for *Non-profit Capacity Building*.

Applications for assistance with HOME-ARP funds will be evaluated based on the following criteria:

(1) Project Description and Soundness. The application includes a project description that is clearly and well-defined, addresses the needs of the qualifying populations and has the ability to timely complete the project. Regarding the development of transitional housing units, the project will be limited to single-family and two-family units.

(2) Project Need and Benefit. The application addresses priority needs identified in the Allocation Plan and achieves favorable outcomes for homeless individuals and other vulnerable populations.

13 2022 Payment Standards established by Kenosha Housing Authority

(3) **Organizational Experience and Capacity.** The application includes documentation that: applicant is experienced with administering similar projects, including projects funded with Federal funds; the experience of staff who will be assigned to the project and the capacity of the applicant to successfully undertake and manage the project.

(4) **Financial Feasibility of the Project.** The project has reasonable project costs and has commitment of funds from other funding sources, less the amount requested from HOME-ARP funds. Greatest priority for funding will be given for projects that provide matching funds and leverage other funding sources.

(5) **Collaboration.** Applicants are encouraged to collaborate with other organizations to successfully meet priority needs in the Allocation plan. For example, an application for Development of Affordable Rental Housing will collaborate with another organization to provide supportive services inside the development.

The City recognizes that the priorities of the Allocation plan may need to be adjusted after the approval of the plan by HUD. Through the City's Citizen Participation Plan for the CDBG and HOME Programs, the City has the ability to amend the Allocation Plan to include an activity not previously included, to remove an activity, to change the funding allocation for eligible activities or to make general amendments. Such amendments shall be in accordance with the Citizen Participation Plan. An amendment is not considered a substantial change where funding is adjusted from one or more funded activities by less than 25%.

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:

The City used data from the Point in Time Count, Housing Inventory Count, Comprehensive Housing Affordability Strategy (CHAS) American Community Survey (ACS) as well as data provided by agencies that provide services to the qualifying populations. The analysis of the housing inventory shows that rent assistance is needed for the qualifying population as well as a need for transitional housing units.

HOME-ARP Production Housing Goals

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

The City estimates that a total of up to four affordable rental housing units (single-family or two-family units transitional rental units) could be produced or rehabilitated with available HOME-ARP funds. The City recognizes that the allocation of funds for *Development of Affordable Rental Housing* probably will not be sufficient for actual construction costs. As

typical for housing funded with HOME Program funds, it may be necessary to combine funding with other funding sources such as the Low-income Housing Tax Credit (LIHTC) program. The LIHTC program is administered by the Wisconsin Housing and Economic Development Agency (WHEDA) in the State of Wisconsin.

Created by the Tax Reform Act of 1986, the LIHTC program gives states the equivalent of nearly \$5 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. The program provides an incentive by providing credit against Federal income tax liability. As a basic program requirement, rental property owners either make at least 20 percent of their housing units available to households with incomes not exceeding 50 percent of the area median family income as adjusted for family size or make at least 40 percent of their housing units available to household with incomes not exceeding 60 percent of an area's median family income as adjusted for family size. Property owners must agree to maintain these percentages for at least 30 years.

Furthermore, the City estimates that another ten households can be provided with tenant-based rental assistance for a period of up to two years.

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

The City's priority needs for the HOME-ARP qualifying populations include the following:

- Affordable housing, especially for those households who are at 30 percent of Kenosha County Area Median Income limit (AMI) and are paying more than fifty percent of their income towards housing costs.
- Homelessness prevention services, especially rent and security deposit assistance
- Supportive services in conjunction with development or rehabilitation of affordable housing units, such as homelessness prevention, mental health services and case management.

The addition of four (4) new affordable transitional rental housing units with associated supportive services will help to reduce the gap of 6,400 affordable rental units.

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 City-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 the City

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.”

If the City is using a CE that has a method of prioritization described in CPD-17-01, then the City has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice , the HOME-ARP allocation plan must identify whether the City 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).
- The City must 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.

While the City is not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the City must describe the planned use of any preferences in

its HOME-ARP allocation plan. This requirement also applies if the City intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If the City fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the City amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice, states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the City's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice.

Identify whether the City 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:

All qualifying populations will be eligible for HOME-ARP funded activities included in the City's Allocation Plan. However, the City does propose to give preference to activities that help prevent homelessness, such as those households that have a severe housing cost burden. A severe housing cost burden is a household that spends more than 50% of their household income towards housing costs.

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 City's needs assessment and gap analysis:

Based on the City's needs assessment and gap analysis, the City identified that there are 3,075 households at 30% AMI who pay more than 50% of their income towards rent. There are another 785 households at 50% AMI who pay more than 50% of their income towards rent. The preference for this population will help to address housing stability and reduce the potential for homelessness.

Referral Methods

The City is not required to describe referral methods in the plan. However, if the City intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the City must ensure compliance with Section IV.C.2 of the Notice.

The City may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the City in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the City, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The City must 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 City 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

If the City uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the City **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the City's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice.

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

The City and its subrecipients utilizing HOME-ARP funds will accept indirect referrals from the Kenosha Continuum of Care or other referral sources from one or more of the qualifying populations. However, the City and its subrecipients will not solely use the coordinated entry (CE) process since not all qualifying populations are included in the Kenosha CE.

Referrals from other sources could include, but are not limited to: churches, landlords, direct inquiries made by individuals seeking services from city departments, referrals from other county departments not part of the COC, as well as referrals from other organizations not part of the COC.

If the City 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.

The City and its subrecipients will not use the CE process.

If the City intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE.

Not applicable.

If the City 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.

Not applicable.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- The City must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- The City may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). The City must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the City in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the City's HOME-ARP allocation plan.
- The City may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS.

However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Describe whether the City intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

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

If the City intends to implement a limitation, explain why the use of a limitation is necessary to 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 City's needs assessment and gap analysis:

The City does not intend to implement a limitation.

If a limitation was identified, describe how the City will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the City's HOME-ARP projects or activities):

The City does not intend to limit eligibility.

Limitation of Eligibility of Qualifying Populations

Any funded activity that proposes to limit eligibility of the Qualifying Populations will require that the City initiate a Substantial Amendment to the adopted HOME-ARP Allocation Plan, along with a new Citizen Participation process.

HOME-ARP Refinancing Guidelines

If the City intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the City must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the City will refinance existing debt for a HOME-ARP rental project, including:

- ***Establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
- ***Requiring a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
- ***Statement of whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
- ***Specifying the required compliance period, whether it is the minimum 15 years or longer.***
- ***Statement that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
- ***Other requirements in the City's guidelines, if applicable:***

The City does not propose to use HOME-ARP funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME-ARP funds.

Appendix

**HOME – ARP Allocation Meeting
January 10, 2023 5:00pm**

Tuesday,

Name	Agency	Address	Phone	Email
Raul Hernandez	ELCA Outreach Center	6218 26 th Ave, Kenosha, WI	262-455-8511	legaladvce@elcaoutreachcenter.org
Lyn Elvetici	City of Kenosha Housing Authority	625 52 nd Street, Rm. 98 Kenosha, WI 53140	262-653-4113	lelvetici@kenoshahud.com
James Hall	Urban League of Kenosha	1418 68 th Street, 53143	262-292-9297	james.hall@ulrk.org
Lewis Duncan Jr.	Kenosha Human Development	3536 52 nd Street	262-818-3585	lduncan@khds.org
Karon Thomas	Shalom Center	8600 Sheridan Ave, Kenosha, WI	262-764-8895	thomask@shalomcenter.org
Aloysius Nelson	Kenosha County Veterans Services	53143	262-605-6690	ali.nelson@kenoshacounty.org
Dan Parrish	Salvation Army	3116 75 th Street	262-564-0286	daniel.parrish@usc.salvationarmy.org
Tamara Coleman	Shalom Center	4314 39 th Ave x121	262-658-1713	colemant@shalomcenter.org
Tami Rongstad	Kenosha County EX	Admin Building	262-455-3631	tami.rongstad@kenoshacounty.org
Ruth Dyson		1427 69 th Street	262-654-4888	rdyson39@gmail.com
Bobby Dyson		1427 69 th Street	262-654-4888	bobbydyson1@yahoo.com
Rollin Pizzala		5303 43 rd Ave	262-705-6963	
Evelyn Pizzala		5303 43 rd Ave	262-705-6963	wieve1@yahoo.com
Savannah Bezotte	Kenosha Public Library		262-818-6907	sbezotte@mykpl.info
Abby Kestler	Kenosha Human Development Services	3536 52 nd Street	262-764-8555	akestler@khds.org
Lisa Haen	Kenosha Human Development Services	3536 52 nd Street	262-764-8555	lhaen@khds.org
Curt Wilson	District 13 – Alderman	7525 28 th Ave	262-945-7248	
Bob McCaigue	Horizon Development Group	3900 S. Prairie Hill Lane, Greenfield, WI	262-384-1105	b.mccaigue@horizondbm.com
Jennifer Hassett	City of Kenosha Housing Authority	625 52 nd Street, Rm. 98 Kenosha, WI 53140	262-653-4120	jhassett@kenoshahud.com
Pauline Lorenz	Society's Assets	5455 Sheridan Rd #101	262-925-6099	plorenz@societysassets.org
Wendy Cross	Shalom Center	8600 Sheridan Ave, Kenosha, WI	262-658-1713 x124	crossw@shalomcenter.org
Mark Melotik	Kenosha County Health Department	53143	262-605-6745	mark.melotik@kenoshacounty.org

HOME – ARP Public Input Session Comments

Tuesday, January 10, 2023

- The homeless have no place to go for shelter and resources
- Homeless persons usually do not have an ID and need one to be placed on the wait list for housing – stuck on wait list
- A lot of homeless persons need help transitioning from nursing homes – homeless persons tend to stay in nursing homes because there are no accessible units, but they are receiving more care than is needed
- Building a new shelter can help the elderly
- There is a problem with a lack of landlords who will accept vouchers, as well as high, unaffordable rent rates
- May be a problem with landlords taking over the program, could be extra upfront expenses required by the landlord
- There were 1,235 calls for motel vouchers in 2022 from January through November – shelter at capacity – need emergency/motel vouchers
- Around 1,500 people on wait list – need more money and/or vouchers – money doesn't cover rent/expenses
- Accessible, affordable units are greatly needed – mental services/case management important to help transition and stay off streets – supportive services are crucial
- There was an 115%-120% increase in competitive rental rates
- Transitional housing with case management could be helpful – breaks cycle of homelessness by teaching life and financial skills to not end up back on the streets – supportive services are crucial to end homelessness
- Allowing availability of units for persons with one eviction
- Veterans tiny house village (15 homes) is a model
- How often are veterans counted? And how many have been honorably discharged?
- Many veterans from Illinois are coming up over the border for help
- With motel vouchers, motels fill up very fast
- Need more help than just funding for building/updating shelters, need help learning skills to encourage non-homelessness
- Working with landlords with resources
- Housing Authority did not miss a payment during COVID, expected eviction rates to increase throughout City resident renters at that time
- Landlords upgrade units and raise rates – can lead to unjust eviction
- Fair housing market value seems a little higher for the area because we are included in the Lake County jurisdiction

HOME – ARP Public Input Session Priority Activities

Participants were asked to vote on their highest priorities for funding

Supportive Services – 22 votes

Tenant-based Rental Assistance – 16 votes

Affordable Housing Units – 14 votes

Non-congregate Shelter – 13 votes

From: "Lisa Haen" <lhaen@khds.org>
To: "City of Kenosha City Development" <citydevelopment@kenosha.org>
Cc: "Veronica Judon" <vjudon@khds.org>, "Jeannine Field, MBA" <jfield@khds.org>
Sent: Monday, February 27, 2023 4:15:54 PM
Subject: [EXTERNAL] Draft HOME-ARP Allocation Plan

This message originated from outside your organization

Good afternoon,

I am writing on behalf of KHDS, in response to the draft HOME ARP Plan. First, we want to thank the City of Kenosha for allowing community members and agencies the opportunity to contribute to the development of the HOME-ARP Plan. We have several comments in regard to the use of HOME-ARP funding.

1. We agree that there is a great need for additional funding for supportive services, specifically case management to support people experiencing homelessness in emergency shelter. Attached are two reports from the Wisconsin Homelessness Management Information System (HMIS) that show the number of people served in Emergency Shelter and the Emergency Motel Voucher Program. When looking at the combined report for all three Emergency Shelter programs you can see that in 2022 the Emergency Motel Voucher program served more people than both Emergency Shelter Programs. In this same report, only thirty-two percent of people exited to permanent housing destinations. When looking at only the Emergency Motel Voucher outcomes, only three percent of people in 2022 exited to permanent housing destinations. The data and current staffing pattern of only one part-time case manager funded by Kenosha County shows a clear need for additional case management for the Emergency Motel Voucher Program.
2. We would support more funding be allocated to Tenant Based Rental Assistance rather than the development of up to four transitional rental housing units. The need for permanent housing is evident as demonstrated by Emergency Motel Voucher Program and Emergency Shelter destination outcomes mentioned above. While there is no arguing that there is a need for additional units of affordable housing in Kenosha, we believe that TBRA vouchers will allow us to serve more people who are experiencing homelessness and prioritized for those services. Consequently, more available vouchers will reduce the length of time people experience homelessness and free up shelter beds. It is important to note that our history of helping people experiencing homelessness to locate and secure safe, affordable housing over the past 20 years has resulted in the development of best practices for housing search that continues to be successful. In the past twelve months, KHDS has helped over fifty people move into housing in the community. In addition, KHDS partners with the Kenosha Housing Authority, using Kenosha's Coordinated Entry System to identify and refer people who are "move-on" ready

from our HUD COC projects to the Emergency Housing Voucher and Mainstream Voucher Programs.

3. We understand that the HOME ARP funding will not use Coordinated Entry (CE) as a referral method. We would strongly encourage the use of our robust Coordinated Entry System with the HOME ARP funding as a referral method for TBRA vouchers. Here is a snapshot of what CE looks like in Kenosha:
 - a. CE is a collaborative effort that includes the following agencies: KHDS, Women and Children's Horizons, The Shalom Center, the Sharing Center, Grace Welcome Center, Oakwood, and I-Care.
 - b. Our four HUD COC projects, ESG Rapid Rehousing Program, the Emergency Housing Voucher Program and Mainstream Voucher Program determine who is most in need of that homeless programming by using Kenosha's Coordinated Entry (CE) System. The CE system is designed to assess, prioritize and refer people experiencing homelessness to gain access to homeless programming.
 - c. The KHDS CE Specialist (funded through a HUD grant by the WI Balance of State COC) offers case conferencing every other week for CE agencies to discuss the people on the priority list, program openings, referral follow-ups and needed data clean-up. The CE System is a well-oiled machine that prevents people from falling through the cracks and holds CE providers responsible for following up on referrals as well as connecting people to other essential community resources/wraparound services.
 - d. Each person referred to the priority list is provided with emergency services, other needed community resources and followed up with in 30, 60 and 90 days to ensure continued need for programming. All CE program data is maintained in the WI HMIS and on the Non-HMIS List (the non-HMIS list is for DV agencies that by law are not allowed to use HMIS and other CE providers that are not required to use HMIS). Attached are two Coordinated Entry reports from the WI Homeless Management Information System that show Kenosha currently has 86 individuals without children and 24 individuals with children waiting for homeless programming. When HMIS data is added to the Non-HMIS data there are currently 101 individuals without children and 43 individuals with children experiencing homeless in Kenosha as of 2.23.23.
4. While we support the prevention of homelessness, we favor using HOME APR funding for people experiencing literal homelessness. The HMIS data provided with this correspondence for both Emergency Shelter and Coordinated Entry show there is a clear need for additional housing and supportive services to address Kenosha's growing homeless population. Our comprehensive Homeless Service Delivery system is well-established and provides a consistent way to assess people at risk of becoming homeless and match people to the appropriate program and/or level of care. The use of HMIS for data collection and reporting allows homeless service providers to see the whole picture of service utilization in the state of Wisconsin,

avoids duplication of services and shows local progress in our effort to end homelessness.

5. Finally, in the draft plan on the bottom of page 21 and top of page 22 in regard to the current housing inventory in Kenosha please note that Women and Children's Horizons has 14 units of DV Rapid Rehousing. The number of Rapid Rehousing beds that Women and Children's Horizons have are included in the 81 RRH beds described in the housing inventory mentioned in the above paragraph. The only transitional housing HUD funded beds are the eight from the KHDS Youth Homelessness Demonstration Program. Another important piece of the HIC/PIT to remember is that the report shows occupancy only on one night of the month, what it does not show is that all of the programs on the Housing inventory chart are at capacity 100% of the time because some of the people are searching for housing and do not yet have a housing move in date. The HIC/PIT also does not show who is currently prioritized for services. Our CE process allows us to maximize our limited number of units/beds through the use of our priority lists, meaning that prior to or when a program opening occurs, we know who is eligible for services, how to contact them and enroll them in the appropriate program. As mentioned above there are currently 144 individuals experiencing homelessness waiting for programming. With our housing inventory at capacity, we are not able to meet the current need for homeless services.

Thank you for your consideration and for the opportunity to make comments on the draft Kenosha HOME ARP Plan. We appreciate the time and effort that is being put into the development of the

Sincerely,

Lisa Haen,

Associate Director

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Prioritization List
Household with Children
<https://wisconsin.clarityhs.com/report/embed/6993/2>

Summary - Open Outcome

Count Households	24
Chronic Households	0
Veteran Households	1
Youth Households	2
Households Fleeing Domestic Violence	5

All Households

Total Households Ever on List

165

Total Households Fleeing Domestic Violence

42

49.25

Average Length of Time on List

25

Total Households Returned to List

177.00

Maximum Length of Time on List

Referral Outcome			Household Type		
Referral Status		Count Households	Household Type ^		Number of Clients
1	Active and Pending On Queue	24	1	Household with Children	163
2	Completed	135			
3	Expired	1			
4	Inactive in CE Program but Pending On Queue	8			

Number of Pending Referrals by Assigned Staff Home Agency		
	Assigned Staff Home Agency ^	Count Households
1	Community Action, Inc. of Rock & Walworth Counties	2
2	House of Hope of Green Bay, Inc.	3
3	Kenosha Human Development Services	6
4	Lakeshore CAP	1
5	NEWCAP, Inc	3
6	Shalom Center	6
7	Solutions Center	4
Totals		24

Accepted Referrals

Household Removed from List

31

Households Accepted From List

11

Households Accepted From List with a Move-In Date

110

Households Removed From List

1

Referrals Denied or Expired

Accepted By

Project Type Code	Count Households
1 PH - Rapid Re-Housing	28
2 Transitional Housing	2
3 Homelessness Prevention	1

Reason Removed From List

Removed From Queue Reason	Count Households
1 Automated Removal	56
2 Whereabouts Unknown	31
3 Self Resolved	14
4 Other	5
5 Reassessed	4
6 Deceased	1

Reason Denied

Denied Reason	Count Households

Reason Expired

Expiration Type	Count Households
1 Automatically Expired Queue ...	1

Client Missing Data Elements

Missing Data Elements	
Disability Status	0
Veteran Status	0
Gender Status	0
Chronic Status	0

Basic Demographics

Race

Race ^	Number of Clients
1 Black, African American, ...	10
2 Multi-Racial	4
3 White	10

Ethnicity

Ethnicity	Number of Clients
1 Non-Hispanic/Non-Lati...	18
2 Hispanic/Latin(a)(o)(x)	6

Gender

Gender	Number of Clients
1 Female	20
2 Male	4

Veteran Status

Veteran Status	Number of Clients
1 Yes	1
2 No	23

Age Range

Age Tiers	Number of Clients
1 18 to 24	1
2 25 to 34	11
3 35 to 44	9
4 45 to 54	2
5 55 to 61	1

63.81

Average LOT of Households currently on List

110.27

Average LOT to Housing Move-In

Prioritization List
Household without Children

<https://wisconsin.clarityhs.com/report/embed/6992/2>

Summary - Open Outcome

Number of Clients	86
Chronic Clients	8
Veteran Clients	1
Youth Clients	4
Senior Clients	24
Clients Fleeing Domestic Violence	7

All Clients

Total Clients Ever on List406

Total Clients Fleeing Domestic Violence34

69.76

Average Length of Time on List

65

Total Clients Returned to List

390.00

Maximum Length of Time on List

Referral Outcome			Household Type		
Referral Status	Number of Clients		Household Type ^	Number of Clients	
1 Active and Pending On Queue	86		1 Household without Children	11	
2 Completed	297		2 Single Adult	387	
3 Denied	2				
4 Expired	3				
5 Inactive in CE Program but Pending on Queue	29				

Number of Pending Referrals by Assigned Staff Home Agency		
Assigned Staff Home Agency ^	Number of Clients	
1 ADVOCAP, INC.	1	
2 Balance of State CoC	1	
3 Catholic Charities of Eau Claire	4	
4 Central Wisconsin Community Action Council - CWCAC	1	
5 City of Appleton	1	
6 Community Action Coalition For South Central Wisconsin, Inc. CACSCW	2	
7 House of Hope of Green Bay, Inc.	1	
8 House of Mercy	1	
9 Kenosha Human Development Services	50	
10 NEWCAP, Inc	3	
11 Shalom Center	18	
12 The Salvation Army of La Crosse	2	
13 Western Dairyland EOC, Inc	1	
Totals	86	

Accepted Referrals

Client Removed from List

58

Clients Accepted From List

32

Clients Accepted From List with a Move-In Date

250

Clients Removed From List

5

Referrals Denied or Expired

Accepted By			Reason Removed From List			Reason Denied			Reason Expired		
Project Type Code	Number of Clients		Removed From Queue Reason	Number of Clients		Denied Reason	Number of Clients		Expiration Type	Number of Clients	
1 PH - Rapid Re-Housing	38		1 Automated Removal	148		1 Client refused services	1		1 Automatically Expired Queue ...	2	
2 PH - Permanent Supportive Ho...	17		2 Whereabouts Unknown	78		2 Other	1		2 Manually Expired	1	
3 Transitional Housing	3		3 Other	15							
			4 Self Resolved	10							
			5 Reassessed	4							

Client Missing Data Elements

Missing Data Elements	
Disability Status	0
Veteran Status	1
Gender Status	0
Chronic Status	0

Basic Demographics

Race			Ethnicity			Gender			Veteran Status			Age Range		
Race ^	Number of Clients		Ethnicity	Number of Clients		Gender	Number of Clients		Veteran Status	Number of Clients		Age Tiers	Number of Clients	
1 American Indian, Alaska...	2		1 Non-Hispanic/Non-Lati...	78		1 Female	33		1 Yes	1		1 18 to 24	4	
2 Black, African American, ...	31		2 Hispanic/Latin(a)(o)(x)	7		2 Male	52		2 No	84		2 25 to 34	15	
3 Multi-Racial	3		3 Data not collected	1		3 A gender other than sin...	1		3 Data not collected	1		3 35 to 44	26	
4 White	49											4 45 to 54	17	
5 Data not collected	1											5 55 to 61	21	
												6 62+	3	

110.73

Average LOT of Clients currently on List

151.50

Average LOT to Housing Move-In

HOME-ARP

Name of Organization



Count

Kenosha	27
N/A	17
Library	12
Public	11
Center	11
Shalom	9
City	5
Housing	4
Authority	4
Inc.	3
Community	2
Church	2

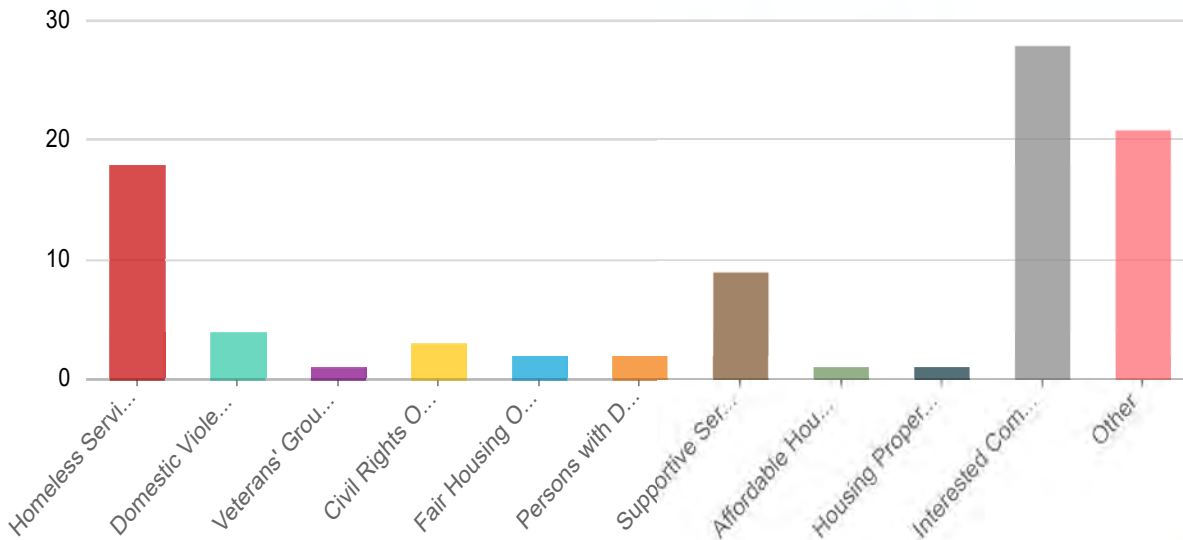
Human	2
Development	2
Services	2
Branch	2
United	2
Berkshire	1
Hathaway	1
Epic	1
Real	1
Estate	1
Bradford	1
Unitarian	1
Universalist	1
Bridges	1
Alderperson	1
Grace	1
Hope	1
Council	1
AODA	1
NAACP	1
NAACP.	1
Pubic	1
Unified	1
School	1
District	1
Legacy	1

Varin	1
Property	1
Management	1
Member	1
Immanuel	1
Methodist	1
Meals	1
Matter	1
site	1
weekly	1
Salvation	1
Army	1
County	1
Walkin'	1
Shoes	1
WOMEN	1
CHILDREN'S	1
HORIZONS	1

Answered: 62 Skipped: 5

HOME-ARP

Which type of organization(s) below best describes the group with which you are affiliated?

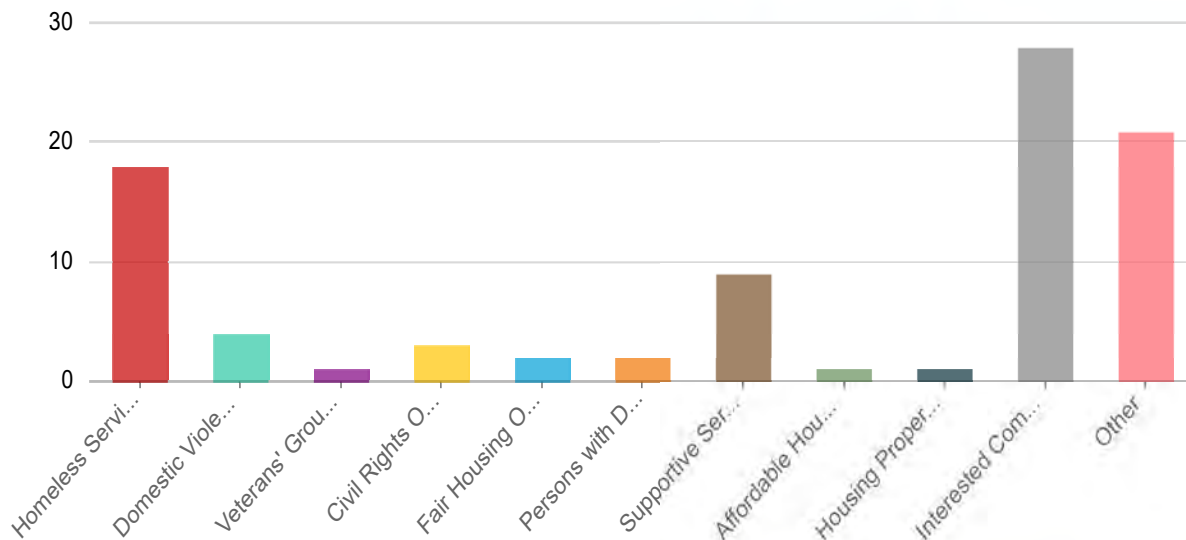


Answers	Count	Percentage
Homeless Service and/or Shelter Provider	18	26.87%
Domestic Violence Service and/or Shelter Provider	4	5.97%
Veterans' Group	1	1.49%
Civil Rights Organization	3	4.48%
Fair Housing Organization	2	2.99%
Persons with Disabilities Organization	2	2.99%
Supportive Services Provider	9	13.43%
Affordable Housing Developer	1	1.49%
Housing Property Manager/Landlord	1	1.49%
Interested Community Member	28	41.79%
Other	21	31.34%

Answered: 67 Stopped: 0

HOME-ARP

Which type of organization(s) below best describes the group with which you are affiliated?



Count

Count

Public Library

4

Public Housing Authority

3

Library

2

Local Government

2

Bradford Community Church Unitarian Univesalist

1

City commissioner

1

Food Pantry, Church

1

Homeless Liaison for students attending KUSD; provide services to students/families

1

Librarian and long-term resident of Kenosha

1

library worker, used to work for a homeless shelter out of state

1

Library-affiliated - I encounter unhoused patrons and assist them where possible

1

Real Estate Broker

1

Sexual Assault and Human Trafficking Services Provider and Shelter

1

Youth Outreach Librarian-work hands on with the K-8th+ students who are impacted by homelessness

1

Answered: 67 Skipped: 0

HOME-ARP

Program Priority Order

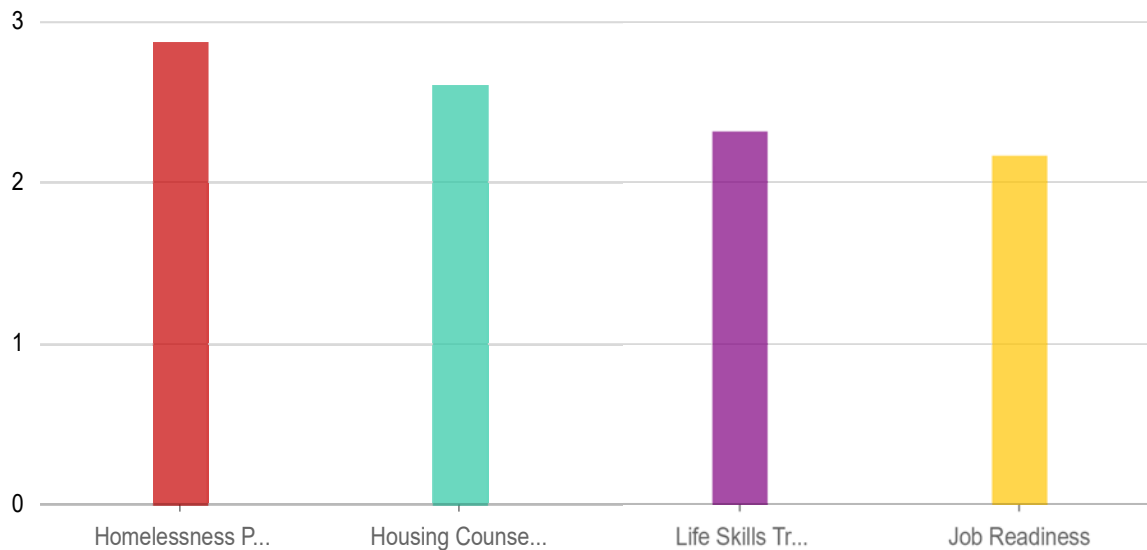


Rank	Answers	1	2	3	Average score
1	Development/Preservation of Affordable Rental Housing (including traditional housing)	34.33% 23	37.31% 25	13.43% 9	14.93% 2.91 10
2	Tenant-based Rental Assistance	20.9% 14	28.36% 19	28.36% 19	2.48
3	Acquisition/Development of Non-Congregate Shelter (shelter provided in individual rooms/units rather than a traditional homeless shelter)	32.84% 22	13.43% 9	11.94% 8	41.79% 2.37 28
4	Services (case management, legal)	11.94%	20.9%	46.27%	2.24

Answered: 67 Skipped: 0

HOME-ARP

Supportive Services

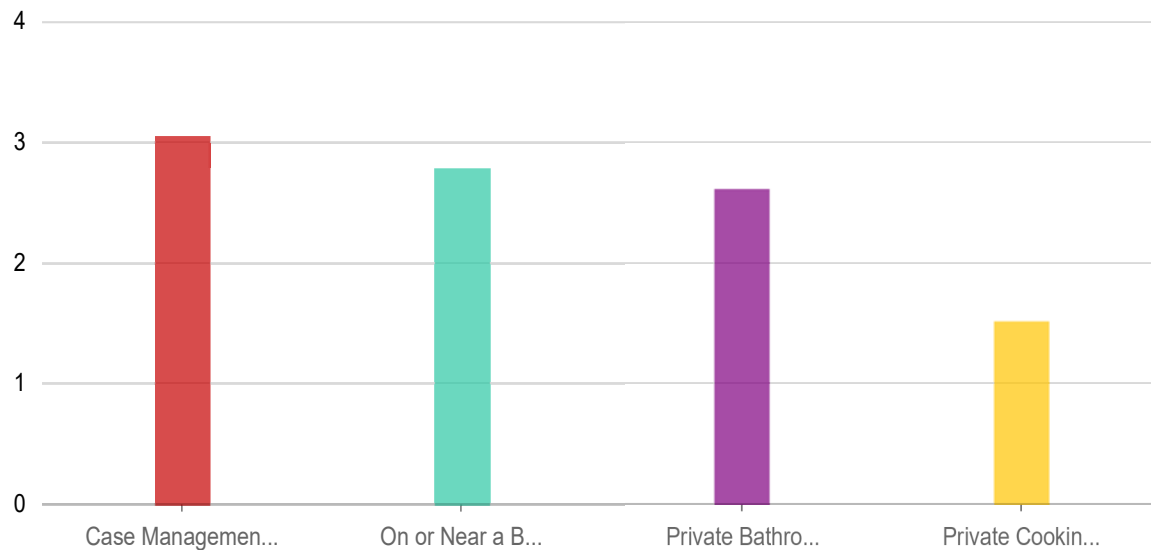


Rank	Answers	1	2	3	Average score
1	Homelessness Prevention Services	44.78% 30	20.9% 14	11.94% 8	22.39% 2.88 15
2	Housing Counseling (housing search, landlord/tenants' rights, budgeting, credit education)	23.88% 16	31.34% 21	26.87% 18	2.61
3	Life Skills Training	16.42% 11	25.37% 17	32.84% 22	25.37% 2.33 17
4	Job Readiness	14.93% 10	22.39% 15	28.36% 19	2.18

Answered: 67 Skipped: 0

HOME-ARP

Non-Congregate Shelters

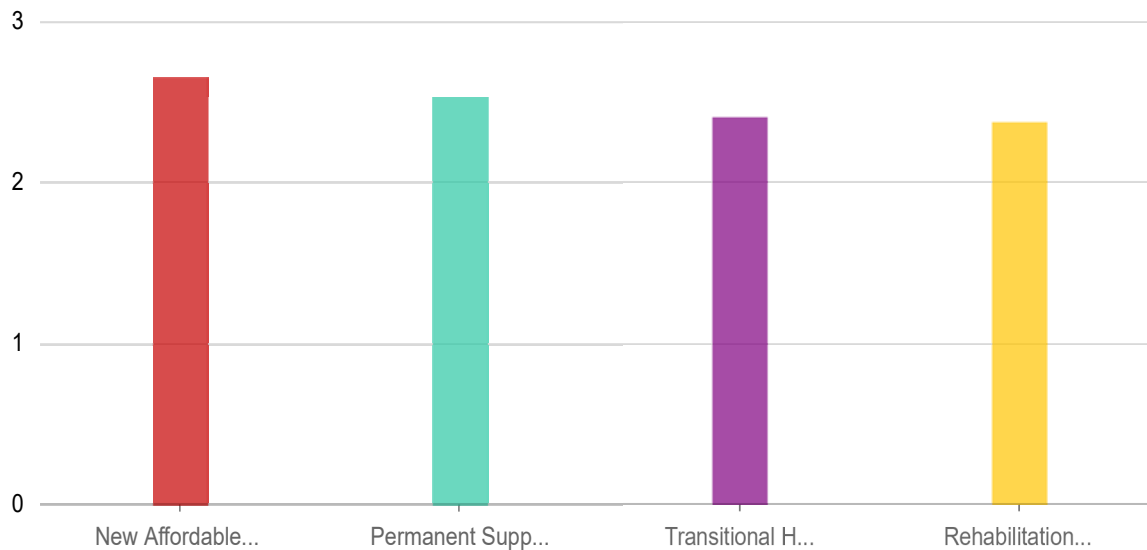


Rank	Answers	1	2	3	Average score
1	Case Management Services	43.94% 29	30.3% 20	13.64% 9	12.12% 3.068
2	On or Near a Bus Line	28.79% 19	39.39% 26	13.64% 9	2.79
3	Private Bathroom	27.27% 18	16.67% 11	46.97% 31	9.09% 2.626
4	Private Cooking Facilities	0% 0	13.64% 9	25.76% 17	1.53

Answered: 66 Skipped: 1

HOME-ARP

Rental Housing

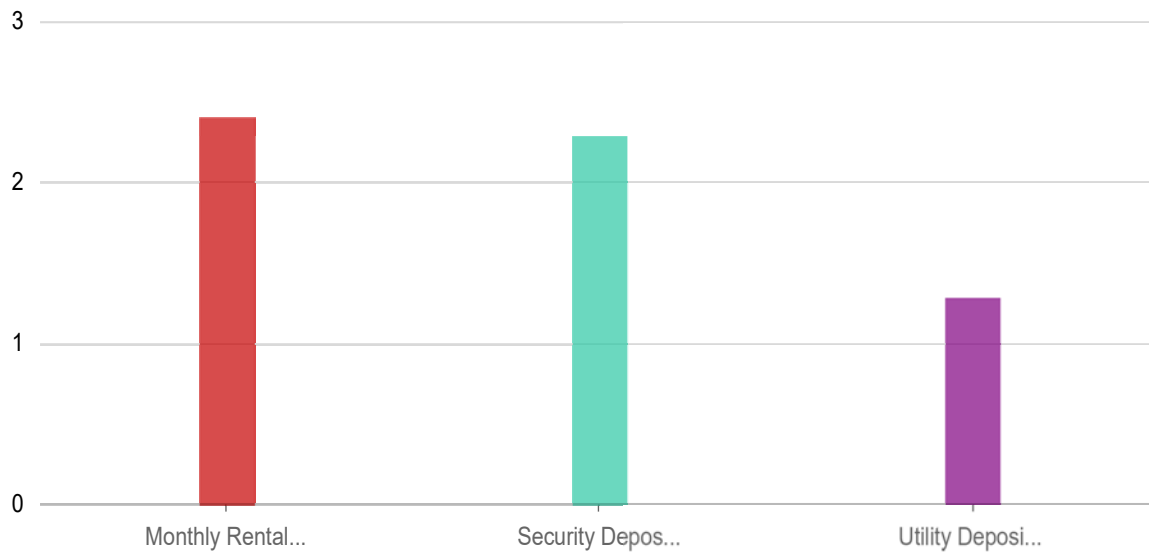


Rank	Answers	1	2	3	Average score
1	New Affordable Units	41.54% 27	13.85% 9	13.85% 9	30.77% 2.66 20
2	Permanent Supportive Housing	16.92% 11	38.46% 25	26.15% 17	2.54
3	Transitional Housing	24.62% 16	23.08% 15	21.54% 14	30.77% 2.42 20
4	Rehabilitation of Existing Units	16.92% 11	24.62% 16	38.46% 25	2.38

Answered: 65 Skipped: 2

HOME-ARP

Tenant-Based Rental Assistance (TBRA)



Rank	Answers	1	2	Average score
1	Monthly Rental Payments	59.02% 36	22.95% 14	18.03% 2.41 11
2	Security Deposit	37.7% 23	54.1% 33	2.30
3	Utility Deposit	3.28% 2	22.95% 14	73.77% 1.30 45

Answered: 61 Skipped: 6