

# ROCK COUNTY CONSORTIUM

City of Beloit, City of Janesville, Greater Rock County

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



ROCK COUNTY  
WISCONSIN



CITY OF  
**Beloit**  
WISCONSIN



CITY OF JANESVILLE  
*Wisconsin's Park Place*

**For Submission to the U.S. Department of Housing and Urban Development as a  
Substantial Plan Amendment to the 2021 Annual Action Plan for the Rock County  
HOME Consortium Community Development Block Grant and HOME Investment  
Partnership Programs**

APPROVED: November 14, 2022

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## Introduction

The Rock County HOME Consortium (Consortium) will receive funding in the amount of \$2,442,156 under the HOME American Rescue Program (HOME-ARP) from the U.S. Department of Housing and Urban Development (HUD). The funds were appropriated under Title II of the Cranston-Gonzalez National Affordable Housing Act of 1990 (NAHA) and the American Rescue Plan Act of 2021.

The Rock County HOME Consortium consists of all governing jurisdictions throughout Rock County, WI. This includes the cities of Janesville and Beloit and Rock County, who represents the cities of Evansville, Edgerton and Milton; villages of Clinton, Footville, and Orfordville; and all townships within Rock County.

The overall purpose of the funding is to provide homelessness assistance and assistance to other vulnerable populations (referred to as “qualifying populations”), including:

- Those who are homeless (McKinney Act definition at 24 CFR 91.5),
- Those who are at-risk of homelessness (McKinney Act definition at 24 CFR 91.5),
- Those who are fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking (Definitions from VAWA at 24 CFR 5.2003, except Human Trafficking definition from Trafficking Victims Protection Act of 2000), and
- Other populations where assistance would prevent the family’s homelessness or serve those with the greatest risk of housing instability.
  - 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.

This plan includes:

- An outline of the consultation and public participation processes used to inform this plan and the feedback received through these processes,
- An assessment of the needs of the qualifying populations and gaps in local housing and service systems,
- Planned use of HOME-ARP funds to support priority activities and production goals.

# Consultation

## Summary of Consultation Process:

The Rock County HOME Consortium used a comprehensive approach and a number of different methods to identify unmet needs and gaps in housing or service delivery systems. Feedback was obtained from the Continuum of Care (CoC, locally known as the Rock & Walworth County Homeless Intervention Task Force or HITF), homeless and 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, and housing developers.

The consultation process included:

1. An informational presentation and feedback session was held with CoC members (HITF) on February 23, 2022 during their monthly meeting. The Rock & Walworth County Homeless Intervention Task Force serves as the CoC for the Consortium's geographic area. Information was shared regarding the HOME-ARP Program, eligible activities, and eligible beneficiaries. Feedback was sought regarding their unmet needs and challenges. A total of 34 participants participated in the meeting.
2. An informational presentation and feedback session was held with members of the Beloit Area Task Force on Homelessness (BATFoH) on February 24, 2022 during their regular monthly meeting. BATFoH (Beloit Area Taskforce on Homelessness) is a committee that was created in 2020 as an effective community catalyst and advocate for meaningful change to address issues related to improving the quality of life for residents experiencing homelessness, and/or housing insecurity, in Beloit, Wisconsin. Information was shared regarding the HOME-ARP Program, eligible activities, and eligible beneficiaries. Feedback was sought regarding their unmet needs and challenges. A total of 27 participants attended the meeting.
3. Information was shared with Finding Opportunities to Collaborate and Unite Services (FOCUS) during their regular bi-monthly meetings on February 9, 2022 and April 13, 2022. FOCUS is an informal coalition of private and public service providers working to identify and address gaps in the programs and services provided to Janesville's homeless population. Nearly 40 non-profit, private, and governmental agencies who have a role in preventing and addressing homelessness and serving the homeless population are members. During the February 9, 2022 meeting, general information was shared regarding the HOME-ARP Program, eligible activities and members were encouraged to participate in the consultation process (including upcoming presentations and input sessions with HITF and BATFA and an online survey). During the April 13, 2022 meeting, information was shared regarding the survey responses and upcoming Diversity Action Team Program.
4. An online survey was conducted from March 10 - March 25, 2022. The survey was distributed to the CoC (HITF), homeless and 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. Respondents were asked to describe the services they provide, share information about program waiting lists, identify obstacles to moving people off of the waiting list, describe unmet needs or gaps in the housing and service delivery systems, identify the greatest unmet need, indicate their organizations capacity and interest in expanding services and/or partnering with affordable housing developers. A total of 39 individuals responded to the online survey.

5. A virtual focus group/meeting was held on April 19, 2022 with non-profit and for-profit affordable housing developers. A total of 21 different developers were invited to participate in a virtual meeting to learn about the HOME-ARP program (purpose, eligible activities, program characteristics and qualifying populations), to share obstacles they experience or foresee in constructing affordable housing generally and with HOME-ARP funding, and to gauge their interest in participating in HOME-ARP activities. Developers invited included those who have expressed interest in, or who have current projects within Rock County and those that were on the State's listing of LIHTC awarded projects. A total of 10 developers representing 8 firms attended the meeting and 2 additional developers provided feedback outside of the scheduled meeting.
6. Consortium members presented at a program entitled "Housing Assistance Through COVID Relief – Looking at Rock County Communities' Use of Federal Funds for Affordable Housing & Housing Services" on April 21, 2022. This program was sponsored by the Diversity Action Team of Rock County, a non-profit organization that strives to eliminate racism and all forms of discrimination in Rock County by embracing diversity, valuing multiculturalism and fostering justice, dignity and respect for everyone. During the program, information was shared regarding the HOME-ARP Program, eligible activities, consultation efforts taken, initial feedback received, and upcoming steps in the planning process. Participants were encouraged to provide feedback on unmet needs they are seeing throughout the County. There were 40 participants in the program.

Consortium members also shared housing and income statistics, cost burden and affordability statistics, COVID relief or American Rescue Plan funding allocations and accomplishments to date, and information about current housing programs. Updates to fair housing activities and efforts to affirmatively further fair housing were also provided.

### Organizations Consulted:

Please see Appendix A for a table summarizing the organizations that were consulted throughout the process, as well as a notation of their agency type(s) and the populations that they serve.

This appendix includes 85 agencies that participated in the consultation process. Throughout the process some agencies participated in multiple consultation opportunities and/or multiple individuals from an agency provided feedback.

## Feedback Received:

1. CoC (HITF) members shared that their top priorities for 2022 were: affordable housing, mental health, emergency shelter, and multiple month's rent, in that order. **Overwhelmingly, members recommended prioritizing funding for affordable housing development as the greatest need.** They noted that HOME-ARP provides a unique opportunity to invest in housing infrastructure and that increasing the supply of low-cost affordable housing should be a priority. Other items that were mentioned included: application fees, credit history and past evictions can be a barrier; and a lack of childcare, particularly in shelter situations and flexible hour childcare to accommodate those working 2<sup>nd</sup> and 3<sup>rd</sup> shifts, is a gap in service.
2. BATFoH members identified the following gaps in services: lack of emergency shelters, difficulty in housing sex offenders and those released from jail, lack of help for those who need help right now (need emergency contacts and phone numbers for immediate placements), and not enough housing navigators. They also shared that there was a need for a holistic approach, additional transitional housing, a way to bring down rental costs, and stated "We need everything". They identified **affordable housing as their top priority.** They feel that lack of affordable housing has created a clog in the system, and that they have people ready to move into housing, but no affordable housing available.
3. FOCUS members have identified **affordable housing development as a priority** and an area where the City of Janesville can help address the needs of Janesville's homeless population. In partnership with ECHO/PATH and other service providers, the Janesville Police Department undertakes homeless outreach efforts. During 2021, they had contact with 111 homeless individuals who shared their greatest needs were shelter, food assistance and financial aid. Individual FOCUS members also provided input through the online survey.
4. A total of 39 individuals responded to the online survey. A summary of the survey results Included:
  - Representatives from all organization types (except developers) responded, with the largest number of responses coming from members of the CoC and homeless service providers.
  - Ten agencies shared that they have a waiting list for their services. Waiting lists were most commonly associated with rental assistance programs, transitional housing, and emergency shelter.
  - The top five most commonly listed unmet needs and the percentage of respondents indicating the need, included: affordable rental housing (92%), emergency or temporary shelter including transitional housing (79%), mental health services (62%), transportation (54%) and landlord/tenant liaison (54%).
  - When asked to identify the single greatest unmet need, a total of 76% indicated affordable rental housing as the greatest need.

- A total of 75% of responding organizations indicated that they had the capacity to expand if additional financial resources were available.
  - Organizations indicated that they had additional interest in exploring partnerships with affordable rental housing developers (71%), tenant-based rent assistance (51%), emergency or temporary housing (57%), and additional supportive services (71%).
  - A total of 19 individuals responded to an open-ended question: “Is there anything else you would like to share with us as we consider how to prioritize these one-time financial resources?”. Numerous of these individuals spoke to the need for additional affordable rental housing units. Multiple individuals mentioned the need for supportive and/or transitional housing. Other areas that were mentioned included: difficulty in prioritizing the unmet needs, additional case management for homeless youth, prioritizing families with young children, expanding existing emergency shelters, lack of transportation, landlords denying participants for credit/criminal history/lack of rental history, the need for assistance with document fees, and the need to expand mental health services
5. Developers shared that HOME-ARP could provide a way to layer in funding with other grants to bring forward projects (WHEDA, AHP) and/or could **help to offset the rising construction costs, which are of great concern**. Developers also shared that if Davis Bacon applies, the financial impact and administrative burden of that should be considered and may lead to a larger sum invested towards fewer projects. Davis Bacon could raise project costs by as much as 20% and will result in a project that is less attractive to contractors (wage rates are likely to be met in any project, but the paperwork and administration burden drives costs). WHEDA likes to see a supportive housing set aside or project-based vouchers committed for 15 years, and there are fewer census tracts that are considered competitive in Rock County. WHEDA is taking comments on their Qualified Allocation Plan. They shared the best way to provide housing would be to consider economies of scale with project size.

***Community Action shared that they would be willing to partner with any developer.***

The Consortium can also help developers make connections with other non-profit service organizations that expressed a willingness to work with developers as part of the online survey. Developers have incorporated community service centers into their projects to provide supportive services. The Cities of Beloit and Janesville shared that they would be willing to allocate project-based vouchers with upcoming RFPs anticipated.

6. No additional feedback was received during the Diversity Action Team (DAT) Program regarding gaps in services or priorities for HOME-ARP funds, although the DAT developed the program in recognition of the challenges the community is experiencing in providing affordable housing.

## Public Participation

### Public Participation Process:

The Draft HOME-ARP Allocation Plan was made available for public comment beginning September 19, 2022 and ending October 19, 2022. The plan was available on the City of Janesville's website and in the Neighborhood & Community Services Department office at 18 N. Jackson Street, Janesville, WI 53548. Notice of the comment period and public hearing was made via public notice in the *Janesville Gazette*. The Janesville Community Development Authority held a public hearing on the HOME-ARP Allocation Plan and Substantial Plan Amendment on October 19, 2022 at 5:30 PM at the Janesville City Hall. Written comments were accepted throughout the review period and oral comments were accepted during the public hearing.

### Efforts to Broaden Public Participation:

The Consortium made an effort to broaden public input and participation by including notice of the plan in the City of Janesville's weekly press releases and social media accounts, and sharing it with members of the CoC (HITF), FOCUS, and others who participated in the consultation process.

The Rock County Housing Authority encouraged participation in the comment period and public hearings that were held in Janesville.

### Summary of Comments Received through the Public Participation Process:

Denise Peters-Kauihou, United Way Blackhawk Region, shared that the document was very readable and she appreciated that "lingo" was kept to a minimum and the narrative was clear and concise so that citizens with a wide range of abilities would find it easy to digest. She requested that information regarding participation in the Beloit Area Task Force on Homeless (BATFoH) be included to further demonstrate the City's comprehensive understanding of housing needs throughout Rock County. She also pointed out a typographical error and made some formatting suggestions.

Ty Bollerud, 4608 Pendleton Court, Milton, WI questioned how we would be able to create 240 affordable units with the HOME-ARP funding, opposed funding for property code enforcement, and advocated for funding for Head Start.

Note: The plan proposes to develop 50 HOME-ARP units; however, additional local, state and federal funds are anticipated to be leveraged to create an additional 190 affordable housing units. No funding is included in the HOME-ARP allocation plan for property code enforcement activities. Funding for Head Start is provided by the U.S. Department of Health and Human Services. Funding for childcare could be provided with a portion of the \$350,000 in supportive service funding included in the plan for eligible individuals.

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

All comments were accepted. Recommendations not to fund code enforcement were not applicable to this plan as no funding was included for code enforcement. Recommendations to fund Head Start were not applicable as that program is fully funded by the US Department of Health and Human Services.

# Needs Assessment and Gaps Analysis

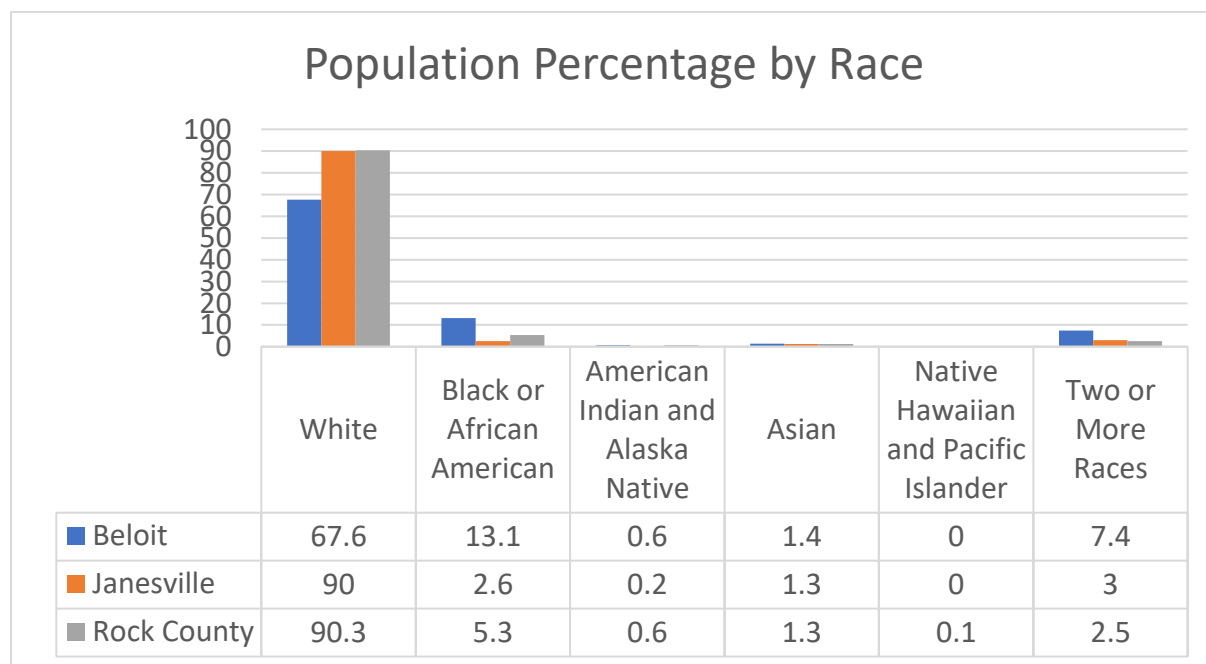
## Introduction/Base Demographics:

The needs assessment evaluates the size and demographic composition of the qualifying populations within Rock County and assesses the unmet needs of each of those populations. In addition, current shelter, housing inventory, and homeless service delivery systems are examined to identify any gaps.

An effort has been made to use the most current data available, including point in time count, housing inventory count, or other data available through the Rock-Walworth County Continuum of Care (HITF). Consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services were also considered.

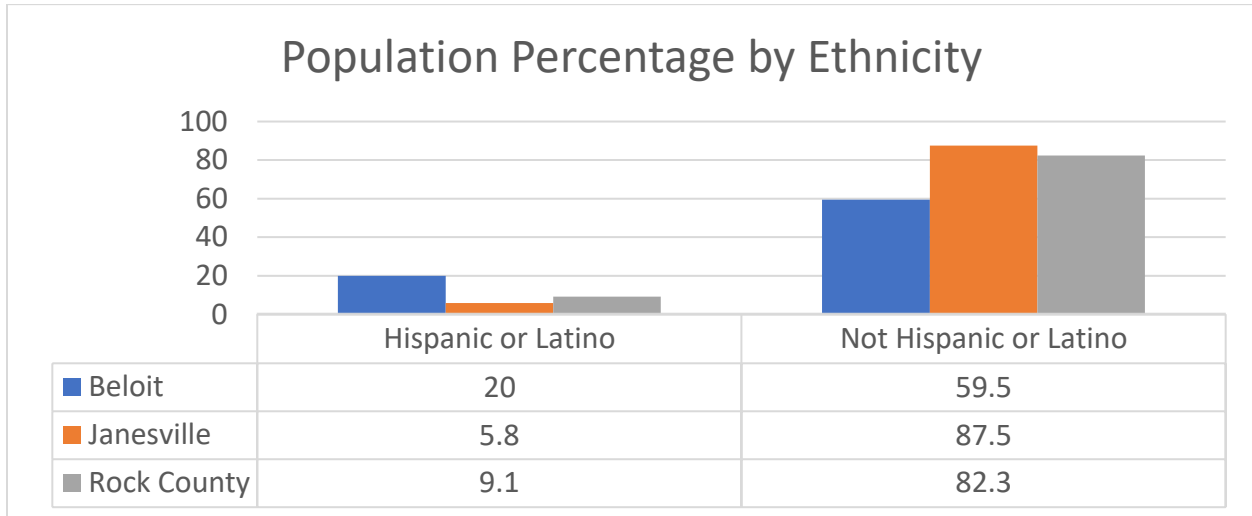
The Rock County HOME Consortium consists of all governing jurisdictions throughout Rock County, WI. This includes the cities of Janesville and Beloit and Rock County, who represents the cities of Evansville, Edgerton and Milton; villages of Clinton, Footville, and Orfordville; and all townships within Rock County. Rock County has a total estimated 2021 population of 164,381 people and its two largest municipalities are the City of Janesville with a population of 65,942 people and the City of Beloit with a population of 36,609.

Base demographics for Rock County, and those from Rock County’s two largest municipalities, Beloit and Janesville are shown in the table below. Beloit has the greatest amount of racial diversity, followed by the City of Janesville with Beloit’s population of color 33% greater than Janesville’s. Of particular note, are the differences between the White, Black or African American and Multi-Racial populations.



Source: U.S. Census Bureau, QuickFacts, July 1, 2021.

Ethnicity data for Rock County, along with the data from Rock County’s two largest municipalities, Beloit and Janesville is shown in the table below. The greatest percentage of individuals of Hispanic or Latino ethnicity is found in Beloit, followed by Rock County and then Janesville. There is a nearly four times greater Hispanic or Latino population in Beloit than Janesville.



Source: U.S. Census Bureau, QuickFacts, July 1, 2021.

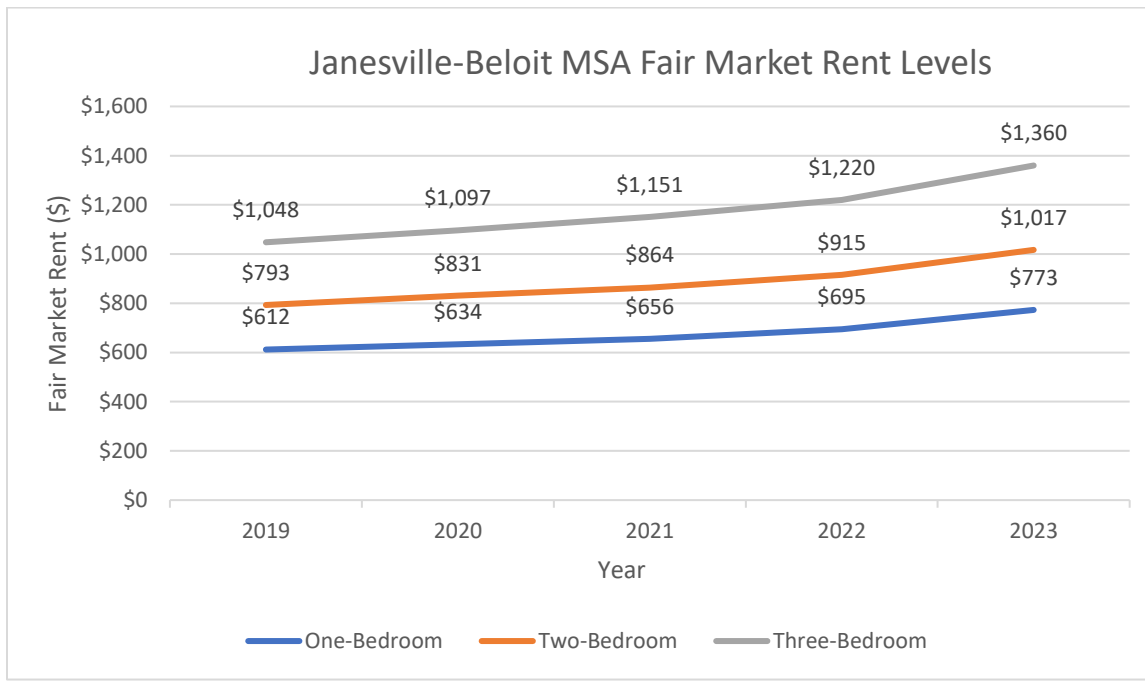
Select housing data for Rock County, along with the data from Rock County’s two largest municipalities, Beloit and Janesville is shown in the table below. Rock County has the highest percentage of owner-occupied homes. Over recent years, there have been slight, gradual changes in owner/renter percentages, with Beloit’s percentage of owner-occupied properties growing and Janesville’s percentage of renter-occupied properties growing. Housing cost have risen dramatically in recent years, as rental and owner vacancy rates are at historic lows.

### Rock County Select Housing Data

	Beloit	Janesville	Rock County
% Owner Occupied (1)	58.1%	65.5%	68.4%
% Renter Occupied (1)	41.9%	34.5%	31.6%
Median Monthly Owner Cost with Mortgage (1)	\$1,045	\$1,216	\$1,276
Median gross rent (1)	\$825	\$874	\$860
Homeowner Vacancy Rate (2)	55 units / 0.7%	35 units / 0.2%	130 units / 0.6%
Rental Vacancy Rate (2)	322 units / 5.6%	198 units / 2.1%	118 units / 2.1%

Sources: 1. U.S. Census Bureau, QuickFacts, July 1, 2021, Data from 2016-2020; 2. ACS, Table DP04, 2020.

HUD Fair Market Rents (FMRs), as defined in [24 CFR 888.113](#) are estimates of gross rent, taking into account both rent and the cost of necessary utilities. HUD calculates the FMR at the 40th percentile of gross rents for standard quality units within a metropolitan area or nonmetropolitan county. The following chart shows that rent levels have grown 26-30% over the past five years, with rents increasing 18% in the past two years alone. Local experience indicates that the FMR levels lag behind the market experience, and that rent levels are currently higher than reflected by HUD's estimate.



Source: HUD Fair Market Rent levels, FY 2019-2023.

### Size and Demographic Composition of Qualifying Populations:

HOME-ARP funds must be used primarily to benefit individuals or families from the following qualifying populations:

- Homeless as defined in 24 CFR 91.5,
- At risk of homelessness as defined in 24 CFR 91.5,
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking as defined by HUD in the Notice, or
- Other populations where assistance would prevent the family's homelessness or serve those with the greatest risk of housing instability as defined by HUD in the Notice
  - 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.

The size and demographic composition of each of the qualifying populations within Rock County will be discussed below.

**Homeless**

*HUD defines Homeless as:*

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a](#)), section 637 of the Head Start Act ([42 U.S.C. 9832](#)), section 41403 of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2](#)), section 330(h) of the Public Health Service Act ([42 U.S.C. 254b\(h\)](#)), section 3 of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012](#)), section 17(b) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)](#)), or section 725 of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a](#));

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

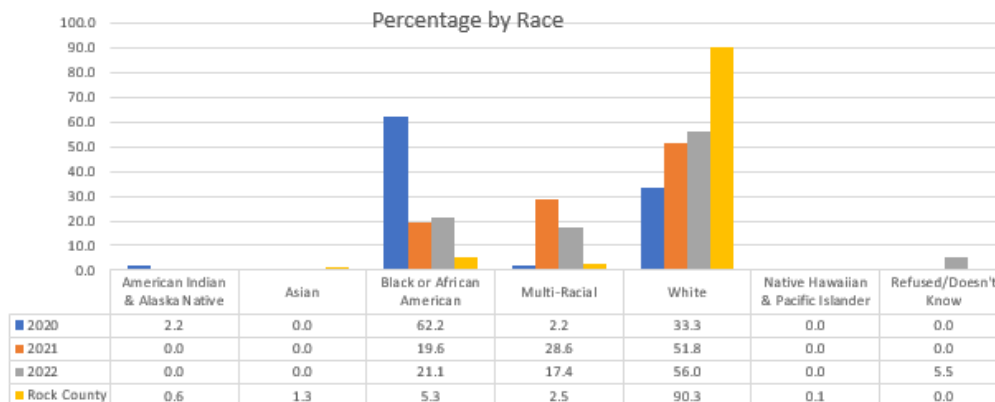
(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

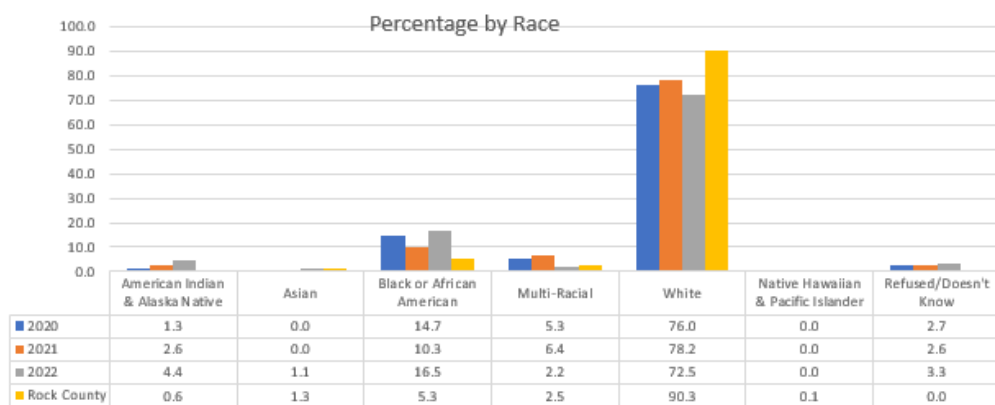
Demographic Information by race and ethnicity, and further separated for families with and without children, is shown in the tables below for those not experiencing domestic violence. The January 2020-2022 Point-In-Time (PIT) counts for Emergency Shelter (ES) and Transitional Housing (TH) (Non-DV FAMILIES) shows the non-white races are disproportionately served in ES/TH compared to the white race. There is also a lot of variation in racial data reported over this 3-year period and no identifiable trend. Households with no children are less racially diverse than those with children. The January 2020-2022 PIT for ES/TH (Non-DV FAMILIES) shows the Hispanic/Latino population are in shelter nearly equal to their population percentage in emergency shelter and transitional housing.

## Homeless Households with at least 1 Child (ES/TH) 2020-2022



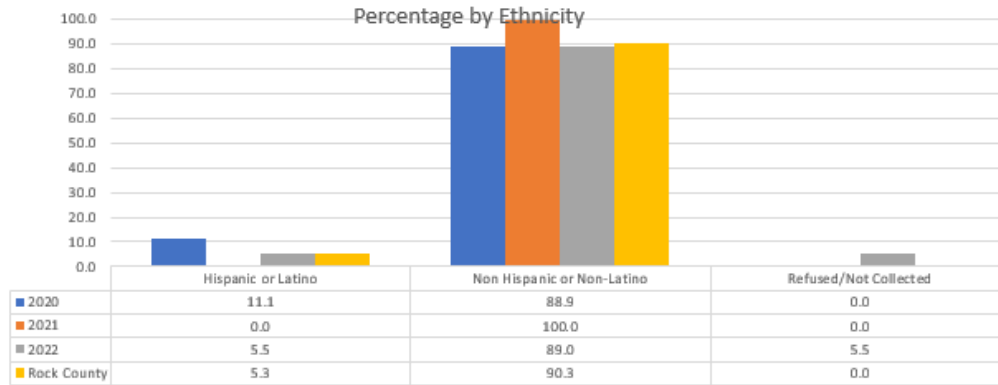
Source: January 2021 PIT, WI Non-WISP (Family Services & YWCA Transitions)

## Homeless Households with no Children (ES/TH) 2020-2022



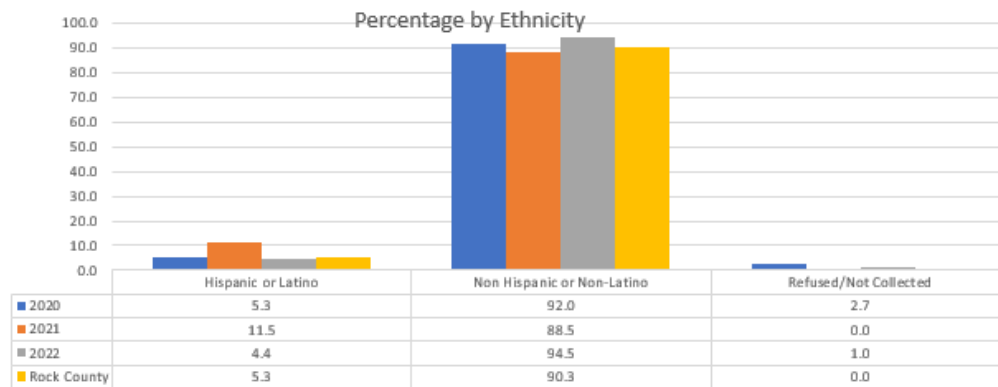
Source: January 2021 PIT, WI Non-WISP (Family Services & YWCA Transitions)

## Homeless Households with at least 1 Child (ES/TH) 2020-2022



Source: January 2021 PIT, WI Non-WISP (Family Services & YWCA Transitions)

## Homeless Households without Children (ES/TH) 2020-2022



Source: January 2021 PIT, WI Non-WISP (Family Services & YWCA Transitions)

## **At Risk of Homelessness**

*HUD defines at risk of homelessness as:*

(1) An individual or family who:

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

(ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a\(3\)](#)), section 637(11) of the Head Start Act ([42 U.S.C. 9832\(11\)](#)), section 41403(6) of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2\(6\)](#)), section 330(h)(5)(A) of the Public Health Service Act ([42 U.S.C. 254b\(h\)\(5\)\(A\)](#)), section 3(m) of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012\(m\)](#)), or section 17(b)(15) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)\(15\)](#)); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a\(2\)](#)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

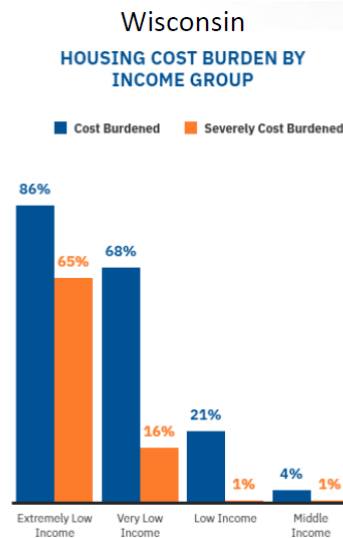
The largest group of individuals at risk of homelessness include individuals and families who have an annual income below 30% of median family income for the area and do not have sufficient resources or support networks immediately available to prevent them from moving to emergency shelter. The tables below include an income distribution for owner and renter-occupied properties. In total, 7,335 households have extremely low incomes at or below 30% of Area Median Income (AMI); 7,785 households have very low incomes between 30%-50% of AMI; and 11,975 households have low incomes between 50%-80% AMI.

Rock County – Income Distribution by Tenure						
	Owner		Renter		Total	
0-30% AMI	2,825	6.3%	4,510	22.0%	7,335	11.3%
30-50% AMI	3,860	8.7%	3,925	19.1%	7,785	12.0%
50-80% AMI	7,000	15.8%	4,975	24.3%	11,975	18.5%
80-100% AMI	4,910	11.1%	2,400	11.7%	7,310	11.3%
Greater than 100% AMI	25,655	58.0%	4,675	22.8%	30,330	46.9%
Total	44,250		20,485		64,740	

Source: Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

Note: Percent totals may not add to 100% due to rounding.

Individuals across Rock County experience high housing cost burden, with those paying over 30% of their gross income towards housing cost being considered cost burdened and those paying over 50% of their gross income towards housing cost being considered severely cost burdened. In Janesville, 39% of renter households (3,375 families) and 19% of owner households (3,220 families) are cost or severely cost burdened. In Beloit, 52.8% of renter households and 30.4% of homeowners have a housing cost burden. Across Wisconsin, you can see that households with the lowest incomes are most likely to experience cost burden.



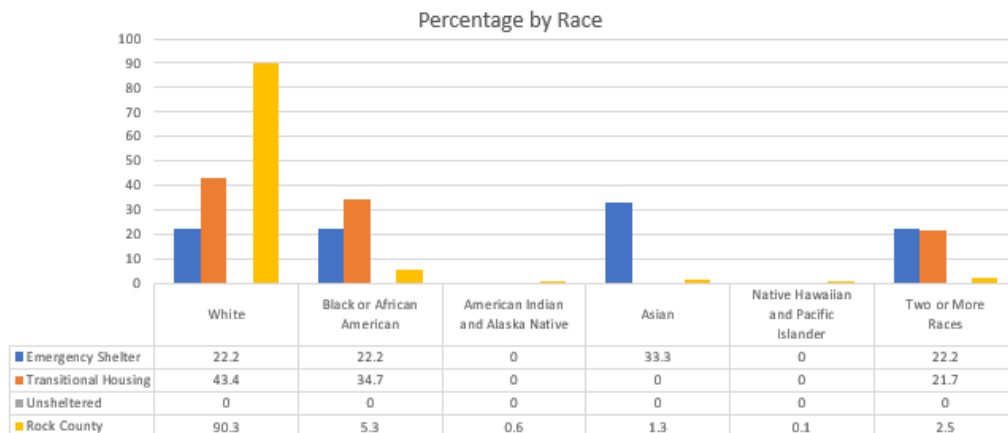
Source: NLIHC tabulations of 2019 ACS PUMS

**Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking (Collectively referred to as Domestic Violence (DV))**

HUD defines this 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.

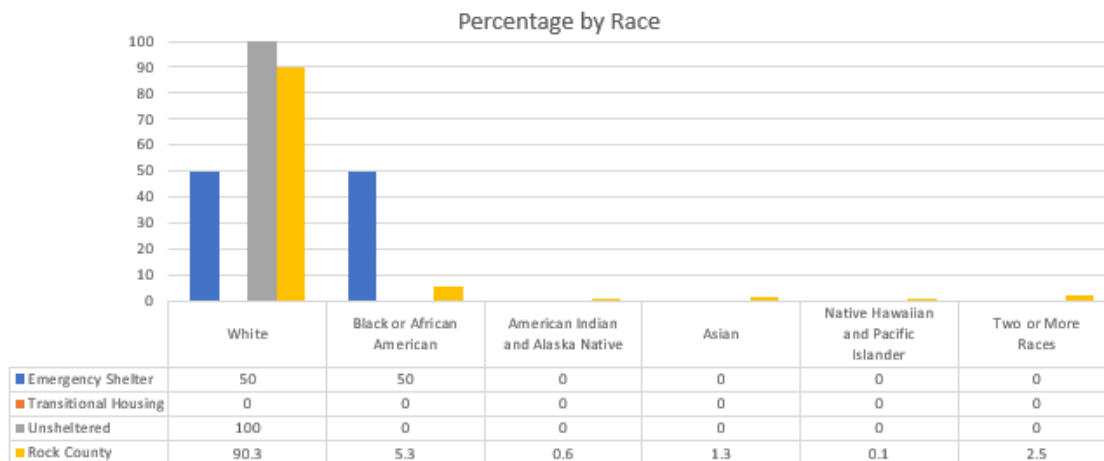
Demographic Information by race and ethnicity, and further separated for families, with and without children, is shown in the tables below for those experiencing domestic violence. The January 2022 Point-In-Time (PIT) counts for Emergency Shelter (ES), Transitional Housing (TH) and Unsheltered DV families shows greater racial diversity, particularly with emergency shelter where the Asian population made up the greatest share at 33%, and equal shares of 22% for White, Black and Multi-Racial. Transitional housing was less diverse, but a greater representation of people of color compared to the overall Rock County population remains. The January 2022 PIT for DV shows a 50/50 split between White and Black household for emergency shelter. Whereas, the unsheltered population was 100% White. The January 2022 PIT for DV families with children shows the Hispanic/Latino population are in emergency shelter over six times more than their proportional Rock County population and four times their population percentage in transitional housing. For families with at least one child, the Hispanic/Latino population are in shelter over three times their population percentage. The one unsheltered DV family was Non-Hispanic.

## Homeless Families w/at least 1 Child (DV) - 2022



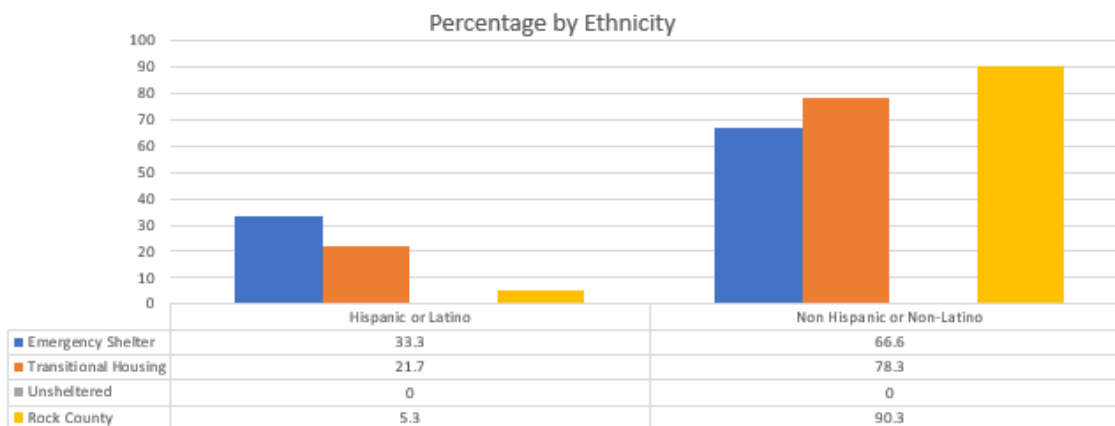
Source: January 2022 PIT, WI Non-WISP (Family Services & YWCA Transitions)

# Homeless Households without Children (DV) - 2022



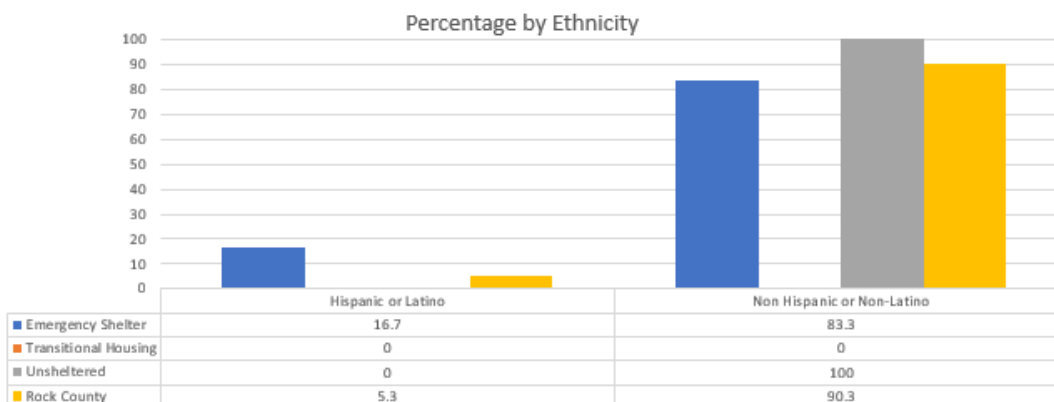
Source: January 2022 PIT, WI Non-WISP (Family Services & YWCA Transitions)

# Homeless Households with at least 1 Child (DV) – 2022



Source: January 2022 PIT, WI Non-WISP (Family Services & YWCA Transitions)

## Homeless Households without Children (DV) – 2022



Source: January 2022 PIT, WI Non-WISP (Family Services & YWCA Transitions)

### **Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability**

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.

Local data to fully and accurately quantify this population is not available. However, applying the state-wide percentages of those experiencing severe housing cost burden to the extremely low-income population (<30% AMI) within Rock County, we could estimate that 4,768 individuals would be at great risk of homelessness. Similarly, applying the state-wide percentages to those experiencing severe housing cost burden to the very low-income population (30-50% AMI), we could estimate that 1,246 individuals would be a great risk of homelessness. Combined these 6,014 individuals would represent an approximate number of individuals in this qualifying population. Individuals and households with very and extremely-low income tend to have a disproportionately high percentage of non-white and Hispanic/Latino individuals.

Current Resources Available to Assist Qualifying Populations, including Congregate and Non-Congregate Shelter Units, Supportive Services, TBRA, and Affordable and Permanent Supportive Rental Housing:

The following agencies currently assist qualifying populations by providing congregate and non-congregate shelter units within Rock County or within the Rock/Walworth County Continuum of Care:

Community Action Inc. Twin Oaks Shelter for the Homeless, Walworth Co.  
Family Promise of Greater Beloit, Beloit  
GIFTS Men's Shelter, Janesville  
House of Mercy Homeless Center, Janesville  
Family Services of Southern WI and Northern Illinois (DV), Beloit  
YWCA (DV), Janesville

Numerous agencies currently provide supportive services to qualifying populations. Please refer back to the listing of organizations consulted with as part of this plan's preparation and found within the consultation section of this plan. The cities of Janesville and Beloit both use Community Development Block Grant funding to support public service activities provided by some of these agencies, including, but not limited to: emergency rent assistance, health care, self-sufficiency programming, youth services, and supportive services. CDBG-CARES funding has been used to provide: emergency rental assistance, medical/mental health and dental care, emergency motel vouchers, emergency shelter services, teen programming, eviction prevention, food access, mortgage and small business assistance.

Recently, Rock County has approved the use of American Rescue Plan funding for tenant legal aid, a homelessness prevention coordinator, and family centered transitional housing resources. The City of Janesville awarded American Rescue Plan funding to non-profit partners, Everyone Cooperating to Help Others and Wisconsin Partnership for Housing Development to create six additional transitional housing units in Janesville. Using Covid relief funding, the Janesville Transit System expanded upon its reduced fare token assistance program to provide 500 bus tokens to participating agencies at no cost to them for two years to temporarily expand agency capacity.

The Rock County HOME Consortium uses their HOME allocation to promote affordable housing, including: rental development and rehabilitation, homeowner rehabilitation and homebuyer assistance.

The Janesville and Beloit Housing Authorities are the largest providers of tenant-based rental assistance through the Housing Choice Voucher (HCV) Program, with 543 and 598 vouchers, respectively. Evansville Housing Authority also administers an HCV Program, with 79 vouchers. The Janesville and Beloit Housing Authorities have both expressed a willingness to allocate project-based vouchers to further support affordable housing developments.

The City of Beloit has 131 public housing units, Evansville has 20 units, Edgerton has 105 elderly public housing units and WHEDA administers a 45-unit Single Room Occupancy in Beloit.

There are approximately 3,187 affordable housing units in project-based affordable units and low-income housing tax credit projects throughout Rock County.

**Unmet Housing and Service Needs of Qualifying Populations:**

**Homeless**

A summary of Rock County’s current resources as compared to the July 2021 homeless point-in-time count, with utilization rates as an indication of unmet housing need, can be found in the following tables. In considering this information it is important to note that this count occurred during a global pandemic. During this time, the service delivery model for homeless individuals and families was modified to mitigate negative effects of the homeless population during the highly contagious Covid-19 pandemic. This was most notable in the area of emergency shelter, where some shelter facilities were closed or operating under reduced occupancy levels. During this time, there was also a significant increase in overflow and voucher capacity, which took the form of increased motel/hotel vouchers. The utilization rates for emergency shelter below do not include those who were housed with temporary motel vouchers. Additional federal resources for emergency shelter and motel vouchers remains in place at this time; however, there is concern for the inability to meet the shelter needs of homeless individuals and families when short term pandemic funding is no longer available.

Homeless Needs Inventory and Gap Analysis Table

	Current Inventory					Overflow & Voucher	PIT Count		Utilization Rates	
	Family		Adults Only		Vets		# of Beds/Units	Family HH (at least 1 child)	Adult HH (w/o child)	Bed Rate
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					
Emergency Shelter/Motel Vouchers	70	27	52	52		106	74	76	66%	55%
Transitional Housing (1)	55	12	74	74	48		32	50	64%	83%
Permanent Supportive Housing	16	5	14	16			16	7	77%	57%
Other Permanent Housing	59	20	10	10			59	10	100%	67%

Source: Continuum of Care Housing Inventory Count (HIC) for Rock County; July 2021.

Note: (1) Families with only children are included in the count for families with children.

**At Risk of Homelessness**

A summary of Rock County’s current resources for rental units that are affordable to those who are at risk of homelessness compared to the number of extremely low-income households with one or more severe housing problems is identified in the table below. This information demonstrates a gap of 1,485 housing units for those who are at risk of homelessness. Please note that the most current data source for this information is based upon 2015-2019 Comprehensive Housing Affordability Strategy data, which is prior to the Coivd-19 pandemic and the significant decline in vacancy rates, which has resulted in rapidly increasing rental rates. This caution is to say that the gap in housing units for those at risk of homelessness is likely much greater than this data would indicate.

Rock County Housing Needs Inventory and Gap Analysis Table

	Current Inventory	Level of Need
	# of Units	# of Households
Total Rental Units	20,485	
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,510	
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5,995

Source: Comprehensive Housing Affordability Strategy (CHAS), 2015-2019.

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

Domestic Violence housing services are primarily provided through Family Services of Southern WI and Northern Illinois and the YWCA of Rock County. Both agencies provide emergency and transitional housing services. When surveyed in March of 2022, the YWCA indicated that they had 19 families on their waiting list and that the average wait time is about 15 months. Family Services did not report having a waiting list. Point-in-Time data is shown below and indicates that capacity appears to be met for family households; however, there is a gap for households without children. The YWCA has had underutilization of their transitional housing units, where they have 11 total units. The Janesville Housing Authority has a partnership agreement whereby individuals and families successfully completing the YWCA’s transitional housing program may move into permanent housing with a Housing Choice Voucher.

Homeless DV Family Households (at least 1 adult and 1 child)

	Sheltered		Unsheltered
	Emergency Shelter	Transitional Housing	
Jan 2021 Total # of Households	5	9	0
Jan 2021 Total # of People	17	40	0
July 2021 Total # of Households	2	8	0
July 2021 Total # of People	10	26	0
Jan 2022 Total # of Households	4	7	0
Jan 2022 Total # of People	9	23	0

Source: Non-WISP Point in Time Data, 2021-2022

Homeless DV Households without Children (couples without children and singles)

	Sheltered		Unsheltered
	Emergency Shelter	Transitional Housing	
Jan 2021 Total # of Households	6	0	7
Jan 2021 Total # of People	6	0	7
July 2021 Total # of Households	6	0	14
July 2021 Total # of People	7	0	16
Jan 2022 Total # of Households	11	0	1
Jan 2022 Total # of People	12	0	1

Source: Non-WISP Point in Time Data, 2021-2022

**Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability**

A summary of Rock County's current resources for rental units that are affordable to other populations requiring services to prevent homelessness and those at greatest risk of housing instability compared to the number of very low-income households with one or more severe housing problems is identified in the table below. This information demonstrates a gap of 1,480 housing units for those who are at greatest risk of housing instability. Please note that the most current data source for this information is based upon 2015-2019 Comprehensive Housing Affordability Strategy data, which is prior to the Covid-19 pandemic and the significant decline in vacancy rates, which has resulted in rapidly increasing rental rates. As noted earlier for those who are at risk of homelessness, it is likely that the gap in housing units for those at greatest risk of housing instability is much greater than this data would indicate.

## Rock County Housing Needs Inventory and Gap Analysis Table

	Current Inventory	Level of Need
	# of Units	# of Households
Total Rental Units	20,485	
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,925	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,405

Source: Comprehensive Housing Affordability Strategy (CHAS), 2015-2019.

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

In addition to the gaps identified throughout this section for individuals in the various qualifying categories, there is currently a lack of low-barrier or barrier free emergency homeless shelters. Through our consultation efforts, additional gaps in services were identified, including: mental health services, food assistance, child care (particularly in shelter and flexible hour care to accommodate 2<sup>nd</sup> and 3<sup>rd</sup> shift employment), transportation and landlord/tenant liaison services. Since the initial consultation, additional resources have been made available to help fill the gap, particularly in the areas of public transportation and landlord/tenant liaison services.

### Additional Characteristics Associated with Instability and Increased Risk of Homelessness:

In addition to low income households with severe housing problems, 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.

Applying the state-wide percentages of those experiencing severe housing cost burden to the extremely low-income population (<30% AMI) within Rock County, it is estimated that 4,768 individuals would be at greater risk of housing instability. Similarly, applying the state-wide percentages to those experiencing severe housing cost burden to the very low-income population (30-50% AMI), it is estimated that 1,246 individuals would be at greater risk of housing instability. Combined these 6,014 individuals would represent an approximate number of individuals in this qualifying population.

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

Input obtained during the comprehensive consultation process and as presented throughout the needs section of this report were used to determine the level of need and gaps in services. Consultation included feedback from the CoC (Rock & Walworth County Homeless Intervention Task Force or HITF), homeless and 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, and housing developers. Feedback received throughout the consultation process was validated by local housing inventory and homeless point-in-time data. Please refer back to these sections for additional information.

## Priority Needs for Qualifying Populations/Rationale for Funding Eligible Activities:

The highest priority need for all qualifying populations is for additional affordable rental units. Additional priority needs include, but are not limited to supportive services, such as mental health services, food assistance, childcare (particularly in shelter and flexible hour care to accommodate 2<sup>nd</sup> and 3<sup>rd</sup> shift employment), and case management to coordinate services. **There was a clear priority among all of those consulted that the greatest need was for additional housing units.** HOME-ARP provides a unique opportunity to invest in housing infrastructure and that increasing the supply of low-cost affordable housing should be a priority. Supportive services was a secondary priority, and may be particularly beneficial when paired with additional housing units.

Individuals working in emergency shelters noted that while facility capacity was generally exceeded with a waiting list, the greatest *contributing* factor to a family's homelessness was the lack of affordable units across Rock County. It is felt that providing additional affordable rental units will provide some relief to emergency shelters and provide greater housing stability.

Additional rental assistance has long been identified as a high priority need for the homeless population, but again the lack of affordable housing is hindering the ability of existing agencies to assist in this area. As an example, both the Janesville and Beloit Housing Authorities report that families with Housing Choice Vouchers in hand are struggling to find suitable housing, which frequently results in lengthy housing searches and voucher expirations. This means that individuals who have successfully applied to HCV programs, waited for services, and then met all program eligibility criteria, are unable to use the rental assistance being offered because of a lack of housing. Similarly, agencies who have historically provided rental assistance are shifting those resources to more costly motel vouchers as affordable rental units are unavailable.

## HOME-ARP Activities

### Use of HOME-ARP Funding:

The Consortium intends to use HOME-ARP funding as follows:

Eligible Use	Funding Amount	Percent of Grant	Accomplishments
Affordable Rental Housing Development	\$1,976,000	81%	50 HOME-ARP affordable housing units created (240 total affordable housing units created)
Supportive Services	\$350,000	14%	95 individuals provided with supportive services
Administration & Planning	\$116,156	5%	
Total	\$2,442,156	100%	

Note: Administrative and planning are below the statutory limit of 15% and no funds will be allocated for non-profit capacity building or operating assistance.

HOME-ARP funding has not yet been allocated to specific projects because the request for funding resulted in requests that exceeded the amount available. Consortium members desire to explore additional funding sources to support the higher level of development proposed through the applications received. Applications are also dependent on WHEDA housing tax credits and other funding sources, so awards may need to be reallocated to other projects if other funding sources are not ultimately secured.

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

In the event that the Consortium desires to change the method of distributing funds; to carry out an eligible activity not previously described in this Allocation Plan; to change the purpose, scope, location, or beneficiaries of an activity; or to add a preference not described in the plan, the Consortium will seek to amend the HOME-ARP Allocation Plan following the established Participation Plan. The Consortium may make a non-substantial change in its allocation priorities from one eligible activity to another activity already identified in the plan as reflected by no more than a 20% increase or decrease in an activity's funding amount.

## Method for Distributing HOME-ARP in Accordance with Priority Needs:

The Rock County HOME Consortium released a Request for Proposals (RFP) and information and application packet on June 8, 2022. The Consortium sought proposals from interested parties with the capacity and interest to implement projects supporting the prioritized HOME-ARP populations and activities. Specifically, the Consortium sought proposals that would serve HOME-ARP eligible populations and address the following priority activities:

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

Notice of the RFP was shared with all individuals and agencies participating in the consultation process, posted to the City of Janesville's website and RFP solicitation page, and via public press release. Interested parties were provided an opportunity to ask written questions and seek clarification about the HOME-ARP program, the RFP, or the application process by June 24, 2022. Responses to questions received were posted to the City of Janesville's website July 1, 2022 to ensure that all interested parties received consistent and equal information.

The Consortium received three responses to the RFP requesting \$5,109,286 in HOME – ARP funds, more than double the amount of funding available. All three of the applicants meet the threshold criteria for consideration and were invited to give a proposal presentation to the evaluation committee on August 3, 2022. Proposals were evaluated based on the information submitted in the proposal plus information obtained during the presentation by an evaluation committee consisting of a representative from each of the three administrative partners in the Rock County HOME Consortium.

Proposals were evaluated based upon the following criteria:

- Project Description & Soundness - Consideration was given to how well the proposed project was designed to provide homelessness assistance and assistance to other vulnerable populations by providing permanent rental housing and supportive services; how well the project would serve individuals within a qualifying population; the organization's understanding of the development process and ability to timely move forward to undertake and complete the project; and the project's sustainability.
- Project Need and Benefit – Consideration was given to how well the proposed project would address identified community needs; would meet the high priority need for affordable rental housing and supportive services; identified specific outputs and would achieve favorable outcomes for homeless individuals and other vulnerable populations.
- Organizational Experience & Capacity – Consideration was given to an organizations experience in administering similar projects, including those with federal, state or local housing funds; the applicable experience of the staff who will be directly working on this project, and capacity of the organization to successfully undertake and manage the proposed project. Consideration was also be given to the strength of the organization's administrative capacity and commitment to culturally competent service delivery.

- Financial Feasibility of Project – Consideration was given to the cost effective provision of the project and/or services; the reasonableness of the project cost; the organization’s ability to leverage HOME-ARP funds for greater project impact; the organization’s ability to provide matching funds to the project;
- Community Collaboration – Consideration was given to the strength of community collaborations to more fully assist the homeless and other vulnerable populations.
- Women- and Minority-Owned Businesses – Consideration was given to women and minority-owned businesses and the efforts applicants would undertake to encourage the use of such businesses.
- Section 3 Businesses – Consideration was given to Section 3 businesses and efforts the applicants would undertake to award business to Section 3 contractors.

The RFP process identified that there was capacity and interest among the development and social service community to undertake projects supporting the prioritized HOME-ARP populations and activities.

In the event that the projects included in the original applications do not move forward and there is a need to seek additional proposals, the Consortium will follow an open RFP process substantially similar to that originally undertaken.

**Housing Production and Supportive Service Goals:**

The Consortium estimates that 50 affordable rental housing units for qualifying populations will be produced with the HOME-ARP allocation and that they will remain available for a minimum of 15 years. The addition of these units will result in individuals and families maintaining and/or improving their housing stability and self-sufficiency.

It is estimated that these funds will be paired with additional federal, state or local housing resources to produce an additional 190 affordable housing units for a total of 240 total affordable housing units. The additional affordable units will be subject to WHEDA tax credit requirements and will be made available on the more traditional income eligibility requirements; these units would provide a significant boost in affordable housing development over HOME-ARP units alone. Units funded with WHEDA tax credits will also carry a 30-year deed restriction regarding income levels for tenants.

The Consortium estimates that a total of 95 individuals living in housing supported with HOME-ARP will be provided with supportive services. Supportive services may include, but are not limited to: childcare, education services, employment services/job training, food, housing counseling, life skills training, mental health services, case management, and landlord/tenant liaison. The provision of supportive services will result in individuals and families increasing their total income and obtaining greater self-sufficiency through income stability.

Preferences:

The Consortium does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Refinancing Guidelines:

The Consortium does not intend to allocate funding to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. The Consortium intends to fund the new construction of affordable rental units and supportive services. The Consortium does not intend to use HOME-ARP funds for the rehabilitation of existing rental units.

Administration of HOME-ARP Activities:

As the Participating Jurisdiction, the City of Janesville intends to administer the HOME-ARP and activities on behalf of the Rock County HOME Consortium. An Intergovernmental Agreement will be executed that outlines the roles and responsibilities of each of the participating members (City of Beloit, City of Janesville and Rock County) under the HOME-ARP Program.

As it relates to non-administrative activities under the HOME-ARP, the Consortium intends to enter into project-specific Developer's Agreements for the development of affordable rental housing and the provision of supportive services.



Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: 9/20/2021	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
<b>State Use Only:</b>		
6. Date Received by State: _____	7. State Application Identifier: _____	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: CITY OF JANESVILLE - ROCK COUNTY HOME CONSORTIUM		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 39-6005472	* c. UEI: M8LJHE6AJU15	
<b>d. Address:</b>		
* Street1: 18 N JACKSON STREET	_____	
Street2: _____	_____	
* City: JANESVILLE	_____	
County/Parish: _____	_____	
* State: WI: Wisconsin	_____	
Province: _____	_____	
* Country: USA: UNITED STATES	_____	
* Zip / Postal Code: 53548	_____	
<b>e. Organizational Unit:</b>		
Department Name: NEIGHBORHOOD & COMMUNITY SVC	Division Name: _____	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: _____	* First Name: JENNIFER	_____
Middle Name: _____	_____	
* Last Name: PETRUZZELLO	_____	
Suffix: _____	_____	
Title: NEIGHBORHOOD & COMMUNITY SERVICES DIRECTOR		
Organizational Affiliation: _____		
* Telephone Number: 608-755-3038	Fax Number: N/A	
* Email: PETRUZZELLOJ@CI.JANESVILLE.WI.US		

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

U.S DEPARTMENT OF HOUSING & URBAN DEVELOPMENT - CPD

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

14.239

CFDA Title:

HOME INVESTMENT PARTNERSHIPS PROGRAM

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

M-21-DP-55-0211

\* Title:

HOME-ARP

**13. Competition Identification Number:**

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

HOME-ARP ALLOCATION PLAN

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

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

* a. Federal	<input type="text" value="2,442,156.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="2,442,156.00"/>

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

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

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

\*\* I AGREE

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

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## HOME-ARP CERTIFICATIONS

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

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

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

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

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

  
Signature of Authorized Official

11/23/22  
Date

ACTING CITY MANAGER  
Title

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

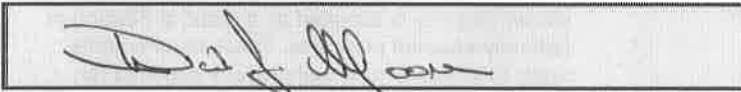
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE ACTING CITY MANAGER
APPLICANT ORGANIZATION CITY OF JANESVILLE	DATE SUBMITTED 11/23/22

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

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


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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	ACTING CITY MANAGER
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF JANESVILLE	11/23/22