

Employment Grant Program Manual

STATE OF WISCONSIN DEPARTMENT OF ADMINISTRATION
DIVISION OF ENERGY, HOUSING, AND COMMUNITY RESOURCES
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PROGRAM RULES AND GUIDANCE FOR THE EMPLOYMENT GRANT

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Chapter 1: General Information

INTRODUCTION

The Wisconsin Department of Administration's (DOA) Division of Energy, Housing, and Community Resources (DEHCR) developed this handbook as a resource for the Employment Grant Program. Employment Grant Program grantees are required to follow all state requirements, policies, and procedures in this guide.

This manual can be found at

<https://doa.wi.gov/Pages/LocalGovtsGrants/SupportiveHousingPrograms.aspx>

WISCONSIN GENERAL PURPOSE REVENUE (GPR)

The employment grant is funded by Wisconsin General Purpose Revenue. GPR is taxpayer revenue raised by the state. The General Fund supports the general functions of state government.

EMPLOYMENT GRANT PROGRAM

The Employment Grant program awards funding to an eligible grantee. The grant and all match contributed shall be used for the purpose of connecting homeless individuals with permanent employment.

ELIGIBLE APPLICANTS

The program limits eligible recipients to municipalities. Municipalities are defined as: a county, city, village or town. Recipients must be an existing Homeless Management Information System (HMIS) subscriber, and program funds may be used to pay for HMIS-related costs. Grantees are required to provide a minimum amount of matching funds.

USE OF FUNDS

GPR funds awarded by DEHCR are divided into two categories: Wages for homeless individuals participating in the employment grants program and operational costs. Further, grantees are required to provide matching funds. Grantees are required to track all three subsets of funds.

Wages for Homeless Individuals Participating in the Employment Grant Programs

According to Wisconsin Statute, grantees must allocate most funding for the purpose of paying the wages of homeless individuals participating in the grant program.

Operational Costs

Operational costs are used to operate the program. See Chapter 3: Eligible Services for more information on how to use Program Funds.

Matching Funds

Grantees are required to provide matching funds. The total amount of matching funds must be generated according to contract. However, matching funds may be spent on any appropriate expenditure.

DEFINITIONS

Homeless

For the purposes of the Employment Grant Program, the federal Department of Housing and Urban Development's (HUD) definition of homelessness shall be used. Per Federal statute 24 CFR 576.2

"Homeless", there are four categories of homelessness. These categories are:

- (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for 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 a place not meant for human habitation immediately before entering that institution;
- (2) Individuals and families who will imminently lose their primary nighttime residence;
- (3) Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; or
- (4) Individuals and families who are fleeing, or are 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.

Chapter 2: Program Administration

GENERAL ADMINISTRATIVE STRUCTURE

To receive Employment Grant Program funds, grantees must commit to providing services that connect homeless individuals with permanent employment. Employment Grant Program funds are awarded annually to one grantee.

The primary contract for Employment Grant Program administration will be between DEHCR and an identified grantee. As part of their applications, grantees must submit a Contract Administrator Identification Form specifying their contract signatory, fiscal contact, and program contact person or persons. DEHCR will use this as each grantee's official contact list. Grantees must notify DEHCR and submit an amended form whenever there is a change in the grantee's contact person.

A sub-recipient may administer all elements of its Employment Grant Program directly or may sub-contract with another public or private grantee, or a nonprofit organization. The grantee may involve its local Continuum of Care (COC) partners.

The grantee will maintain primary responsibility for all contractual issues.

As a part of administering the program, the grantee must participate in any Employment Grant trainings, events or workshops, and must commit to using and participating in applicable Homeless Management Information System (HMIS) training throughout the contract period. See the section titled Homeless Management Information System Requirements.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) REQUIREMENTS

All grantees and sub-grantees must comply with HMIS participation requirements. HMIS is a web-based data-tracking system that measures the scope of homelessness in Wisconsin, tracks service delivery to people who are homeless, and helps evaluate the effectiveness of service interventions. In Wisconsin, the HMIS designated by the HUD COCs is Wisconsin Service Point (WISP).

To ensure compliance with HMIS Data Standards and relevant regulations, grantees must:

- Ensure HMIS users have completed the HMIS User Agreement;
- Comply with the State of Wisconsin HMIS Governance Charter and Policies & Procedures;
- Adhere to the current HMIS Data Standards and the most recent HMIS Data Manual;
- Cooperate with the HUD-recognized COCs' requests for information, performance measures, monitoring, and technical assistance;
- Attend HMIS trainings during the contract period when and if available.

Grantees must create records in HMIS for clients who receive assistance through Employment Grant funds and/or funds used to match Employment Grant funds according to the following specifications:

- The Universal Data Elements must be completed for every client, including all members of the household served; Program Specific Data Elements must also be completed for relevant members of the household.

- Programs must document service transactions each month a specific service is provided.
- Programs must document referrals to the designated referral types for each client.
- Entry/Exits must document the date the client enrolled in the program and exited the program, the reason the client left the program, the destination after exit, and changes to adult earned and non-earned income as well as non-cash benefits.

A client file and service record must be created and maintained for each client served. Grantees and sub-grantees are required to use WISP to generate monthly reports to reflect their levels of service.

SUB-CONTRACTS/SUB-GRANTEES

Employment Grant grantees must encumber all sub-recipients with the program delivery requirements outlined in their contracts and program applications. Grantees must either:

- Demonstrate the capacity to fulfill all the responsibilities of directly administering the Employment Grant Program (e.g. provision of eligible services); or
- Develop agreement(s) with outside provider(s) who are qualified to meet any unfilled responsibilities of directly administering the Employment Grant.

CONTRACT AMENDMENTS

Employment Grant grantees may amend their contracts only with written approval from DEHCR. To request a contract amendment, Employment Grant grantees are encouraged to consult with the Employment Grant Program Manager, then submit either electronically or by postal mail:

- A formal written request on the grantee's letterhead and signed by someone with contract signature authority (which must define and justify the changes being made);
- An amended budget if any changes are being made (Excel files preferred).

DEHCR must receive all contract amendment requests no later than thirty (30) days before the end of the contract period.

COORDINATED ENTRY

Coordinated entry refers to a single place or process for people to access homelessness prevention, housing, and related services within a given COC. It may be the only "door" for particular kinds of assistance, or there may be other ways to access assistance. It includes the following core components:

- Information so people will know where or how to access coordinated entry.
- A place or way to request assistance, such as a walk-in center or a 211 call center.
- A screening and assessment process and tools to gather information about the person, their housing and service needs, and program eligibility and priority.
- Information about programs and agencies which provide housing or services.
- A process and tools for referral to appropriate programs or agencies.
- In some cases, a process and tools for making program admissions decisions.

HUD COCs are required to develop and implement coordinated entry. Employment Grant grantees may participate, but are not required to participate in coordinated entry and may use any applicable

coordinated entry procedures to evaluate client eligibility.

CONFIDENTIALITY

Grantees must develop and implement written confidentiality procedures to ensure all records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any person or family who applies for and/or receives Employment Grant assistance is kept secure and confidential.

CONFLICT OF INTEREST

Grantees must comply with organizational, individual, and procurement conflict of interest provisions. Grantees will be required to repay any Employment Grant funds disbursed for persons with whom there is an identified conflict of interest unless an exception is granted by DOA.

Organizational Conflicts of Interest

Grantees must not condition Employment Grant assistance on a client's acceptance of housing owned by the grantee, a parent or subsidiary of the grantee.

INVOLUNTARY FAMILY SEPARATION AND NON-DISCRIMINATION

The following rules apply to all grantees:

- All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marriage status identifying as a family must be served as a family by any project which serves families. There can be no involuntary separation.
- There can be no documentation requirement or need for "proof" of family, gender identification, and/or sexual orientation. Examples of prohibited inquiry and documentation include but are not limited to parentage, birth certificates, and marriage certificates.
- Families with children under age 18 must not be denied services based on the age of any child under age 18. For example, a family could not be denied assistance because there is a 16-year-old in the family.

MONITORING AND ENFORCEMENT

Notification of Monitoring Visit

DEHCR will periodically monitor the performance of each grantee. In conducting performance reviews, information will be obtained from the records and reports from onsite or desk monitoring, audit reports, and information from the Federal Integrated Disbursement and Information System (IDIS) and HMIS. Monitoring reviews to determine compliance with specific program requirements will be conducted as necessary. At least 30 days' notice will be given to the grantee prior to the monitoring visit or desk review.

Employment Grant staff will inform the grantee of DEHCR's plan to conduct a desk or onsite monitoring. Employment Grant staff will confirm a date for monitoring and will provide additional information in a monitoring appointment letter. The monitoring appointment letter will detail which documentation must be provided to DEHCR in advance of and on the date of the monitoring. It will also clarify some of

the logistical details of the monitoring, such as the expected time of arrival of Employment Grant staff for onsite monitoring.

Desk monitoring

All requested documentation for a desk monitoring must be sent via postal mail to Employment Grant program staff. These materials must be received by DEHCR within the timeframe listed in the monitoring appointment letter. Grantee staff, including finance and program staff, must be available to discuss any questions or provide supplemental documentation.

Onsite Monitoring

Monitoring questionnaires for onsite monitoring visits must be returned via email at least seven (7) days in advance of the monitoring visit.

During the visit, Employment Grant staff will review client files, financial procedures and records, and grantee policies. Employment Grant staff will interview program clients for 5-10 minutes each (if possible) during the visit. DEHCR will collaboratively work with grantees and sub grantees to determine optimal interview times and places. Staff involved in the administration or fiscal operation of the program will be needed to go over program and fiscal materials and respond to questions during the visit.

Non-compliance with Program Requirements

If it is determined that the grantee has not complied with a program requirement, the grantee will be given written notice of this determination and given an opportunity to demonstrate compliance. If any grantee is found not compliant, remedies may include:

- Instructions that the grantee submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with requirements, including:
 1. Preparing and following a schedule of actions for carrying out activities affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities.
 2. Establishing and following a management plan which assigns responsibilities for carrying out the remedial actions.
 3. Canceling or revising activities likely to be affected by the noncompliance before expending Employment Grant funds for the activities.
 4. Suspending disbursement of Employment Grant funds for some or all activities.
 5. Reducing or terminating the remaining grant.

Requiring repayment of Employment Grant funds from the grantee.

RECORD-KEEPING AND RETENTION

Grantees must retain all program files and records (including client files) for a minimum five (5) years after the contract period ends. All files must be available for review or audit by DEHCR upon request. Often the turnaround for request for files is short; therefore, files must be readily accessible and received by DEHCR within the timeframe requested.

Chapter 3: Program Requirements

CLIENT ELIGIBILITY

Eligible clients must be defined as homeless or immediately at risk of homelessness according to Federal Statute 24 CFR 576.2, defined in Chapter One of this program manual.

ELIGIBLE SERVICES

Eligible services, which may be paid for with program funds, must be used for the purpose of connecting homeless individuals with permanent employment.

Examples of eligible services include:

- soft skills training, company tours, budgeting classes, educational assessments, goal setting, job searches/applications, resume building and cover letter writing, mock interviews, college/technical school tours and assistance with registering for classes, and job/work experience

SUPPORTIVE SERVICES

Grantees may provide supportive services to Employment Grant clients. Grantees may provide supportive services directly or contract services through another grantee. These services may be provided above and beyond the services agreed to in the grantee's contract with DEHCR.

Supportive services include but are not limited to case management, mental health services, transportation assistance, and life skills training.

Clients may be encouraged but cannot be required to participate in supportive services; as such, they cannot be terminated from a Employment Grant program due to non-participation in supportive services. DEHCR makes an exception for self-sufficiency programs.

CLIENT APPLICATIONS

Application Details

Applications must be submitted in writing (either in-person or electronically). Applications must include all information required by the grantees to determine the client's household income and eligibility. Grantees may develop application forms that meet their specific needs.

Pre-Screening

Grantees may choose to use a shorter pre-screen form to place potentially eligible applicants on a waiting list. When an applicant is selected from the waiting list, they must then complete the full application form, which must include new/updated (i.e. current to the full application form) information to be used to determine eligibility.

Eligibility Determination

Applicants must be selected from each grantee's waiting list in the order established by the grantee's policy. To determine a client's eligibility, the grantee must verify that the client meets all criteria listed in the Client Eligibility section of this manual.

Client Files/Checklist

A client file must be created for each applicant who at minimum submits a pre-screen form regardless of whether the applicant is eventually accepted or denied. This file must contain the checklist, application, all associated documentation, and all written correspondence between the client and grantee.

For accepted clients, files must contain the client's:

<i>Client Case Files</i>	
	Client Application
	Verification of Client Eligibility
	Documentation of services provided for homeless individuals to help gain permanent employment

Denial

Applicants who are determined to be ineligible must be notified in writing. The written notice must identify why the applicant is ineligible. It must also inform the client that they have ten (10) calendar days from the date of notice to request a review of the decision. Reviews must be requested in writing to the grantee.

WAITING LIST POLICY

The demand for assistance may be greater than available resources. Grantees may choose to use a waiting list. The grantee wait list's eligible clients must establish a written Waiting List Policy which defines how the waiting list is managed. The following is a non-exhaustive list of parameters grantees may use to organize their waiting lists:

- The order in which assistance is offered (i.e. approved preference selection policy based on aggregate needs, first come-first served, lottery, etc.);
- The length of time for utilizing the waiting list (i.e. maintaining the list for a fixed period of time, then starting over; accepting applications for a fixed period of time, then closing until all eligible applicants receive assistance; continuously accepting applications; etc.);
- The severity or intensity of each client's need.

Chapter 4: Ongoing Administration

PAYMENT PROCESS

Grantees must develop a payment process for disbursing Employment Grant payments to outside entities, if they subcontract.

PROGRAM FILES SPOT CHECK

The implementation of spot checking procedures helps improve the consistency and completeness of program files. Agencies are to establish procedures to routinely, randomly spot check program files for proper documentation and completeness. The grantee must maintain a list of files that were reviewed. The list of files with dates of review must be made available upon DEHCR's request and during monitoring. DEHCR recommends that agencies review 5% to 10% of their open client files.

MONTHLY REPORTING

Grantees are required to submit monthly reporting packets to DEHCR which must be received on or before the fifteenth (15th) of each month for the previous month's activities. DEHCR will provide a reporting template which must be used.

Example of reports grantees must submit to DEHCR pertaining to services provided:

1. The numbers of individuals served.
2. The amount provided in wages for individuals participating in the program.
3. The number of persons enrolled in or referred to:
 - a. Skills training
 - b. Company tours
 - c. Budgeting classes
 - d. Educational assessments/Goal setting
 - e. Resume/cover letter/interview preparation
 - f. College/technical college
 - g. Job/work experience
 - h. Other programs/assistance
4. The number of persons who received other services.
5. The number of recipients that gained employment who were previously unemployed.
6. The number of recipients that increased the number of hours worked/week.

Grantees must report all expenditures under the program.

DEHCR reserves the right to require additional information or reports as needed.

Payment Request and Final Draw

Payment requests must be submitted by mail to DOADECRCFiscal@wisconsin.gov or mailed to the following address:

Department of Administration
Division of Energy, Housing & Community Resources
Attn: Fiscal
P. O. Box 7970
Madison, WI 53707-7970

Grantees should refer to the contract agreement for additional information on final draw timelines and procedures.