

# Homeless Case Management Services 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 HOMELESS CASE  
MANAGEMENT SERVICES GRANT

# Contents

<b>Chapter 1: General Information</b> .....	<b>2</b>
Introduction .....	2
The Federal Temporary Assistance to Needy Families (TANF) .....	2
Homeless Case Management Services (HCMS) Grants.....	2
Application Process .....	3
Use of Funds.....	3
<b>Chapter 2: Program Administration</b> .....	<b>4</b>
General Administrative Structure .....	4
Homeless Management Information System (HMIS) Requirements .....	4
Sub-Contracts/Sub-Grantees .....	4
Contract Amendments.....	4
Coordinated Entry.....	5
Confidentiality.....	5
Conflict of Interest .....	5
Involuntary Family Separation and Non-Discrimination.....	6
Definitions .....	6
Monitoring and Enforcement .....	7
Record-Keeping and Retention .....	7
<b>Chapter 3: Program Requirements</b> .....	<b>8</b>
Client Eligibility.....	8
Non-Reimbursable Costs.....	8
Supportive Services.....	8
Client Applications .....	8
Pre-Screening .....	9
Client Files/Checklist .....	9
Waiting List Policy .....	9
<b>Chapter 4: Ongoing Administration</b> .....	<b>10</b>
Payment Process.....	10
Monthly Reporting.....	10
Payment Request and Final Draw .....	10

# 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 Homeless Case Management Services Grant (HCMS) Program. HCMS grantees are required to follow all state and federal requirements, policies, and procedures in this guide.

This manual can be found at

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

## The Federal Temporary Assistance to Needy Families (TANF)

Congress created the Temporary Assistance for Needy Families (TANF) block grant through the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, as part of a federal effort to "end welfare as we know it." The Department of Children and Families (DCF) will pay the Department of Administration (DOA) funds administered under the Temporary Assistance for Needy Families (TANF) program to effectuate the purposes of §16.3085 of the Wisconsin Statutes, as created by 2017 Wisconsin Act 59. The TANF program is federally administered by U.S. Department of Health and Human Services (HHS). Under TANF, the federal government provides a block grant to the states, which use these funds to operate their own programs.

The intent of the TANF grants are to:

1. Aid needy families so that children may be cared for in their own homes or in the homes of relatives.
2. End the dependence of needy parents on government benefits by promoting job preparation, work and marriage.
3. Prevent and reduce the incidence of out of wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies.
4. Encourage the formation and maintenance of two parent families.

TANF funds are allocated on an annual basis. Funds are appropriated by formula based on available federal funds and through state budget appropriations process.

More information on funding can be found in your contract attachment C.

## Homeless Case Management Services (HCMS) Grants

The HCMS Grants program awards funding to eligible grantees to provide intensive case management services to homeless families. Case management is provided to clients in the following areas:

- Financial management
- Employment
- Ensure school continuation for children
- Enrolling unemployed or underemployed parents in W-2 or the Food Share employment and training program.

Case management services provided may include other services not previously listed; however, shelters must also provide the listed services if they intend to apply for funding under this program.

## Application Process

DEHCR's HCMS application process operates on a one-year cycle. Under the program, DEHCR will award up to 10 annual grants per year for up to \$50,000. No match is required; however, grantees providing match receive preference for funding.

Eligible recipients are limited to shelter facilities, defined as temporary places of lodging for homeless individuals and families.

Further, recipients must participate in the Homeless Management Information System.

## Use of Funds

HCMS funds awarded by DEHCR are divided into two categories: Program Funds and Administrative Funds. Grantees are not required to provide matching funds. Each grantee's allocation of funds is specified in their contract.

### **Program Funds**

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

### **Administrative Funds**

Administrative costs are eligible under this program but are limited to no more than 15% of the total award. These funds may only be used to pay the costs of administering the HCMS program. Eligible administrative costs include staff salaries and other costs related to executing HCMS administrative activities.

## Chapter 2: Program Administration

### General Administrative Structure

To receive TANF HCMS funds, grantees must commit to providing the services mutually agreed upon in the contracts.

A grantee may administer all elements of its HCMS program directly or sub-contract with another public or private grantee, or a nonprofit organization.

The grantee must maintain primary responsibility for all contractual issues.

### Homeless Management Information System (HMIS) Requirements

All grantees and sub-grantees must comply with Homeless Management Information System (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 Continuum of Care is Wisconsin Service Point (WISP).

As a part of administering the program, the grantee must commit to using HMIS and participating in applicable HMIS trainings throughout the contract period.

Grantees and sub-grantees are required to use WISP to generate monthly reports to reflect their levels of service.

### Sub-Contracts/Sub-Grantees

HCMS 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 HCMS (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 HCMS.

### Contract Amendments

HCMS grantees may amend their contracts only with written approval from DEHCR. To request a contract amendment, HCMS grantees are encouraged to consult with the HCMS Program Manager, then electronically submit:

- 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. HCMS 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 HCMS 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 HCMS funds disbursed for persons with whom there is an identified conflict of interest unless an exception is granted by the Department.

### **Organizational Conflicts of Interest**

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

### **Procurement Conflicts of Interest**

In the procurement of property and services, the conflict-of-interest provisions at 42 CFR 495.348 apply. These regulations require grantees to maintain written standards governing the performance of their employees engaged in awarding and administering contracts. At a minimum, these standards must:

1. Require that no employee, officer, agent of the grantee shall participate in the selection, award, or administration of a contract supported by HCMS funds if their participation would create a real or apparent conflict of interest.
2. Require that grantee employees, officers and agents not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.

3. Stipulate provisions for penalties, sanctions, or other disciplinary actions for violations of standards.

## 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.

## Definitions

For the purposes of HCMS, DEHCR defines the following terms:

- **“Shelter facility,”** as defined in §16.308, is “a temporary place of lodging for homeless individuals or families.”
- **“Intensive case-management services”** means individualized advice and coaching combined with other services, or referrals to appropriate services, including at least one of the following:
  1. Services related to financial management;
  2. Services intended to ensure continuation of children’s school enrollment and attendance;
  3. Services to enroll unemployed or underemployed parents in the Food Stamp Employment and Training (FSET) program or the Wisconsin Works program under §49.141 to 49.161, Wisconsin Statutes (which, under §49.155, includes the Wisconsin Shares child-care subsidy program for low-income working parents);
  4. Other employment-related services, including connecting parents who are job-training graduates, or who have a recent work history, with services provided by their local workforce development board, and assisting parents with using the Job-Center of Wisconsin website maintained by the Department of Workforce Development.
- **“Homeless families”** means either:
  1. Homeless adults (age 18 or older) accompanied by minor children (under age 18 for whom the homeless adults are legally responsible, or under 19 but a full-time student in high school, working on an equivalency degree, or enrolled in basic vocational or technical education); or
  2. Homeless pregnant women; or
  3. Homeless adults, unaccompanied by children, who are non-custodial parents of children under the age of 18); or
  4. Homeless adults, unaccompanied by children, who are over age 18 but younger than age 25 and accompanied by another person related by blood or marriage.

## Monitoring and Enforcement

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 HMIS. Monitoring reviews to determine compliance with specific program requirements will be conducted as necessary.

## 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 upon request from DEHCR. 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 “homeless families”, which includes:

1. Homeless adults (age 18 or older) accompanied by minor children (under age 18 for whom the homeless adults are legally responsible, or under 19 but a full-time student in high school, working on an equivalency degree, or enrolled in basic vocational or technical education); or
2. Homeless pregnant women; or
3. Homeless adults, unaccompanied by children, who are non-custodial parents of children under the age of 18; or
4. Homeless adults, unaccompanied by children, who are over age 18 but younger than age 25 and accompanied by another person related by blood or marriage.

**Priority goes to clients meeting definitions 1 or 2 above, but clients meeting definitions 3 and 4 are also eligible.**

### Non-Reimbursable Costs

HCMS funds may not be spent on the following:

- Capital expenditures;
- Expenditures for alcoholic beverages;
- Any expenditures for items that could be construed as entertainment, including social activities and tickets to movies, shows, sports events, or concerts, and any costs related to attending such events, whether or not admission is charged.

### Supportive Services

Grantees must provide supportive services to HCMS 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, money management, mental health services, educational access for children, transportation assistance, and life skills training.

### Client Applications

#### Application Details

Applications must be submitted in writing (either in-person or electronically) and must include all information required by the grantee to determine the client’s 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. If an applicant is selected from the waiting list, they must then complete the full application form, which must include new/updated information to be used to determine eligibility.

## 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 following:

<i>Case Files</i>	
	Client Application
	Verification of Client Eligibility
	Documentation of services received: financial management, employment services, school continuation for children, enrolling unemployed or underemployed parents in W-2 or the Food Share employment and training program

## 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. If a waiting list is used, the grantee 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

If grantees subcontract, they must develop a payment process for disbursing HCMS payments to outside entities. Grantees must reimburse subgrantees in a timely manner.

### Monthly Reporting

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

Grantees must submit reports on the following services provided:

1. The number of households provided with intensive case-management services.
  - a. The number of adults
  - b. The number of children under 18
2. The number of individuals that were provided with intensive case management services.
3. The number of individuals with children under 18 that were served, whether or not a child accompanied the adult to the shelter.
4. The number of children under 18 who received services to ensure continuation of school enrollment for children, or to promote regular school attendance.
5. The number of individuals that were assisted to enroll in **or** referred to:
  - a. Wisconsin Works
  - b. Wisconsin Shares Child Care Subsidy
  - c. Food Share Employment and Training
  - d. Job Center of Wisconsin enrollment
  - e. The Division of Vocational Rehabilitation
  - f. Veterans Resource Officers
  - g. Other organizations/apprenticeship programs
6. The number of individuals who received other services.
7. The number of recipients that gained employment who were previously unemployed.
8. The number of recipients that increased the number of hours worked per week.

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

### Payment Request and Final Draw

Grantees may draw on Department funds as reimbursement of actual reported expenditures. To initiate each payment, grantees must complete and submit the HCMS Payment Request Excel Form on or before the fifteenth (15<sup>th</sup>) of each month for the previous month's expenses.

Payment requests must be submitted by email to [DOADEHCRFiscal@wisconsin.gov](mailto:DOADEHCRFiscal@wisconsin.gov).

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