

# Homeless Case Management Services Grant

STATE OF WISCONSIN DEPARTMENT OF ADMINISTRATION  
DIVISION OF ENERGY, HOUSING, AND COMMUNITY RESOURCES  
JUNE 2018

PROGRAM RULES AND GUIDANCE FOR THE HOMELESS CASE  
MANAGEMENT GRANTS



# Table of Contents

	<b>Page</b>
<b>Chapter 1      General Information</b>	<b>4</b>
Introduction	4
The Federal Temporary Assistance to Needy Families (TANF)	4
Homeless Case Management Services (HCMS) Grants Program	4 - 5
Eligible Applicants	5
Use of Funds	
Program Funds	
Administrative Funds	
Matching Funds	
<b>Chapter 2      Program Administration</b>	<b>6</b>
General Administrative Structure	6
Homeless Management Information System (HMIS) Requirements	6 - 7
Sub-Contracts/Sub-Grantees	7
Contract Amendments	7
Coordinated Entry	7 - 8
Confidentiality	8
Conflict of Interest	8
Organizational Conflicts of Interest	
Procurement Conflicts of Interest	
Involuntary Family Separation and Nondiscrimination	8
Definitions	9
Homeless or Immediately at Risk of Homelessness	
Shelter Facility	
Intensive Case-Management Services	
Homeless Families	
Monitoring and Enforcement	9 - 11
Notification of Monitoring Visit	
Desk Monitoring	
Onsite Monitoring	
Non-compliance with Program Requirements	
Record Keeping and Retention	11
<b>Chapter 3      Program Requirements</b>	<b>12</b>
Client Eligibility	12
Ineligible Services	12
Supportive Services	12
Client Applications	12 - 13
Application Details	

Pre-screening		
Eligibility Determination		
Client Files/Checklist		
Denials		
Waiting List Policy	13	
<b>Chapter 4</b>	<b>Ongoing Administration</b>	<b>14</b>
Payment Process		14
Program Files Spot Check		14
Monthly Reporting		14
Payment Request and Final Draw		14

# 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 foodshare 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.

## **ELIGIBLE APPLICANTS**

The bill limits eligible recipients to: a shelter facility; defined as a place of lodging for homeless individuals and families. DEHCR's HCMS application process operates on a one-year cycle. Under the program, DEHCR will award up to 10 grants per year. No match is required; however, grantees providing match receive preference for funding.

Further, recipients must be existing Homeless Management Information System subscribers or State Shelter Subsidy Grant-participating homeless shelters. Both single grantee as well as lead grantee applicants are eligible to apply for funding.

## **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. If grantees are contracted to include matching funds they must divide the funding into a separate category. Grantees are required to track all three subsets of 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 funds (admin) costs are eligible under this program. However, administrative funds are limited to no more than 15% of the total costs. 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.

### **Matching Funds**

Grantees are not required to provide matching funds, but if contracted to provide match funds they must be tracked. The total amount of matching funds must be generated according to contract. However, matching funds may be spent on any appropriate expenditures.

## **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.

The primary contract for TANF HCMS administration will be between DEHCR and an identified grantee. As part of the application, 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 HCMS program directly or 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 HMIS trainings, events or workshops, and must commit to using and participate 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 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 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.

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 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. 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 DOA.

### **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:

- Homeless or immediately at risk of homelessness [42 USC 11302]: an individual or family is considered homeless or imminently at risk of homelessness if they fall within category 1 or 2 of the HEARTH definition of homelessness.
- The organization operates a “shelter facility,” as defined in §16.308 as, “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.
- The term “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.
  3. May be non-custodial parents of children under the age of 18); or
  4. 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.**

## **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 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.

HCMS staff will inform the grantee of DEHCR's plan to conduct a desk or onsite monitoring. HCMS 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 HCMS staff for onsite monitoring.

### **Desk monitoring**

All requested documentation for a desk monitoring must be sent via postal mail to HCMS 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.

### **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, HCMS staff will review client files, financial procedures and records, and grantee policies. HCMS 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. Grantee 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 HCMS funds for the activities.
  4. Suspending disbursement of HCMS funds for some or all activities.
  5. Reducing or terminating the remaining grant.
- Requiring repayment of HCMS 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 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”, this 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.
3. May be non-custodial parents of children under the age of 18); or
4. 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.**

### INELIGIBLE SERVICES

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 may 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, mental health services, transportation assistance, and life skills training.

Clients may be encouraged but cannot be required to participate in supportive services. They cannot be terminated from a HCMS 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>Case Files</i>	
	Client Application
	Verification of Client Eligibility
	Documentation of services actually received, jobs found, school enrollment, health care enrollment and housing found

**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 lists 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 HCMS payments to outside entities, if they subcontract. Grantees must reimburse subgrantees in a timely manner.

### **PROGRAM FILES SPOT CHECK**

The implementation of spot checking procedures helps improve 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.

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 [DOADEHCRFiscal@wisconsin.gov](mailto:DOADEHCRFiscal@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.