VI. Year One (2025) Annual Action Plan

AP-15 Expected Resources - 24 CFR 91.220(c)(1,2)

Introduction

This Consolidated Plan provides a basis and strategy for the use of federal funds allocated to Dane County, outside the City of Madison, by the U.S. Department of Housing and Urban Development under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. This Consolidated Plan is for the period of January 1, 2025 through December 31, 2029.

Dane County presents the First Year Action Plan for the expenditure of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds expected to be received from the Department of Housing and Urban Development (HUD) for the period of January 1, 2025 through December 31, 2029.

The primary objective of the Community Development Block Grant Program as stated in Title I of the Housing and Community Development Act of 1974, as amended, is the development of viable urban communities. This is achieved by:

- Providing decent housing,
- Providing a suitable living environment, and
- Expanding economic opportunities.

Each activity funded by CDBG must meet one of three national objectives:

- Benefit to low and moderate-income persons,
- Aid in the prevention or elimination of slums or blight; and
- Meet a particularly urgent community development need.

No less than 70% of funds are to be spent on activities that benefit low and moderate- income persons. Spending on public service activities is limited to 15% of the program year allocation plus 15% of the preceding year's program income.

Four categories can be used to meet the LMI national objective (for a description of each National Objective, please see the discussion section below):

- 1. Area benefit activities (LMA)
- 2. Limited clientele activities (LMC)
- 3. Housing activities (LMH) or
- 4. Job creation or retention activities (LMJ)

Anticipated Resources

	Source of Funds		Expected Amount Available Year 1				Expected Amount	
Program		Uses of Funds	Annual Allocation	Program Income	Prior Year Resources	Total \$	Available Remainder of Con Plan\$	Narrative Description
CDBG	public-	Acquisition	\$1,088,902	\$150,000	\$55,000	\$1,293,092	\$4,355,608.00	Expected amount
	federal	Admin and Planning						available remainder of
		Economic Development						Con Plan is based off of
		Homebuyer Assistance						2025 CDBG allocation.
		Homebuilding						Estimated five-year
		Public Improvements						annual CDBG allocation:
		Public Services						\$5,440,460
HOME	public-	Acquisition	\$551,908.90				\$2,207,635.60	Estimated five-year
	federal	Homebuyer assistance						annual HOME allocation:
		Homeowner rehab						\$2,759,544.50
		Multifamily rental new						
		construction						
		Multifamily rental						
		rehab						
		New construction for						
		ownership						
		TBRA						
HOME	public-	Development of	\$1,917,059			\$1,917,059		Affordable Housing
ARP	federal	affordable housing						

Table 1 - Expected Resources – Priority Table

^{*}Expected amounts available for the remainder of the Con Plan are estimated based on the 2025 federal CDBG and HOME allocations.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas.

Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include non-federal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor. CDBG subrecipients also leverage funding from other non-federal sources, including private and foundation grants. In addition, a HOME grant recipient provides match for its project.

CDBG funds will be set aside and used to address urgent needs arising from a natural disaster, such as floods or tornados plus provide needed matching funds to access other forms of disaster assistance funding.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs	Funding	Goal Outcome Indicator
Order		Year	Year		Area	Addressed		
1	Increase access to	2025	2029	Affordable	Dane County	Housing	CDBG:	Homeowner Housing Added: 1 Unit
	affordable quality			Housing	Urban County	Availability/	\$410,696.20	Homeowner Housing Rehabilitated: 23
	housing				Consortium	Affordability	HOME:	Units
							\$413,931.67	Mortgage Assistance: 5 Households
								TBRA/Rapid Rehousing: 23 Households
							HOME ARP:	
							\$1,917,059	
2	Expand economic	2025	2029	Non-Housing	Dane County	Economic	CDBG:	Jobs created/retained: 32 Jobs
	opportunities for			Community	Urban County	Opportunity	\$425,125	Businesses assisted: 148 Businesses
	LMI persons			Development	Consortium			
3	Assure access to	2025	2029	Homeless	Dane County	Public Services	CDBG:	Public Service Activities: 295 Individuals
	public services for			Non-Homeless	Urban County	Accessibility	\$185,835.30	
	LMI persons			Special Needs	Consortium			
				Non-Housing				
				Community				
				Development				
4	Improve public	2025	2029	Non-Housing	Dane County	Public	CDBG: \$0	Public Facility or Infrastructure Activities
	facilities/develop			Community	Urban County	Facilities &		other than Low/Moderate Income
	infrastructure			Development	Consortium	Improvements		Housing Benefit: 0 Persons Assisted
5	Strong Program	2025	2029	Planning and	Dane County	Planning and	CDBG:	Program planning and administration of
	Planning and			Administration	Urban County	Administration	\$217,780.40	CDBG and HOME grants.
	Administration				Consortium		HOME:	
							\$55,190.89	
6	Urgent Need	2025	2029	Non-Housing	Dane County	Urgent Need	CDBG:	Reserved for Urgent Need or Disaster
	Response to			Community	Urban County		\$54,445.10	funding - TBD
	Natural Disasters			Development	Consortium			
				Urgent Need				

Sort	Goal Name	Start	End	Category	Geographic	Needs	Funding	Goal Outcome Indicator
Order		Year	Year		Area	Addressed		
7	CHDO	2025	2029		Dane County	CHDO	HOME:	Community Housing Development
					Urban County		\$82,786.34	Organization - TBD
					Consortium			

Goal Descriptions

1	Goal Name	Increase access to affordable quality housing
	Description	Annual goal will be met through projects including housing rehabilitation, direct financial assistance to homebuyers (mortgage reduction assistance), homebuilding, and tenant-based rental assistance. New construction of at least one unity may occur during the 5-year period. This will be done by Movin' Out, Inc., Project Home, Inc., Operation Fresh Start, The Salvation Army of Dane County, and Wayforward Resources. Future years will include organizations that apply for funding to meet this goal.
2 Goal Name Expand economic opportunities for LMI persons		Expand economic opportunities for LMI persons
	Goal Description	Economic Development will consist of financially supporting businesses, providing technical assistance, and creating/retaining jobs. Annual Goal will be met through the use of sub-recipient agencies including WWBIC to provide technical assistance to microenterprise businesses; the Latino Academy of Workforce Development for the Transportation Business Development Accelerator Program; and the Latino Chamber of Commerce for education and economic assistance.
3 Goal Name Assure access to public services for LMI persons		
	Goal Description	The total amount of CDBG funds obligated for public services activities cannot exceed 15 percent of the annual grant allocation plus 15 percent of program income received during the prior year (24 CFR 570.201(e), 24 CFR 570.207). Public services may include social services, child care, transportation, crime prevention and victim services, workforce development, etc.
		Annual Goal will be met through services including the YW Transit program operated by the YWCA; Support Latinx Survivors of DV, SA, and HT administered by Unidos Against Domestic Violence; The Dane County Workforce Academy operated by Latino Academy of Workforce Development; the Dane County Outreach Program for GED/HSED Services administered by the Omega School; Affordable transportation operated by the Stoughton Affordable Transportation Program; and The Bed Lady Program administered by Sunshine Place, Inc.

4	Goal Name	Improve public facilities/develop infrastructure			
	Goal Description	Although an agency is not funded with 2025 dollars, there is still work being done by a 2024 grant recipient through 2025. This goal is also within our 5-year Consolidated Plan. Annual goals are TBD, depending on agencies that apply for this funding, but may include infrastructure improvements by municipalities, and/or building/improving public facilities such as playgrounds, community/senior centers, food pantries, etc.			
5	Goal Name	Strong Program Planning and Administration			
	Goal Description	Annual Goal will be met by the Dane County Human Services Department- Division of Housing Access and Affordability and the CDBG Commission through oversight and administration of the CDBG/HOME programs, including fair housing activities and submission of applications for federal programs.			
6	Goal Name	Urgent Need Response to Natural Disasters			
	Goal Description	Funds to be set aside and used to address urgent needs arising from a natural disaster, such as floods or tornados plus provide needed matching funds to access other forms of disaster assistance funding.			
7	Goal Name	Community Housing Development Organization (CHDO)			
	Goal Description	Funds to be set aside and used to support a certified Community Housing Development Organizations.			

AP-35 Projects - 91.220(d)

Introduction

The HUD Outcome Performance Measurement System offers three possible objectives for each activity. As noted in the CPD Performance Measurement Guidebook, these are based on the broad statutory purposes of the programs and include:

- Creating Suitable Living Environments relates to activities that are designed to benefit
 communities, families, or individuals by addressing issues in their living environment. This
 objective relates to activities that are intended to address a wide range of issues faced by lowand-moderate income persons, from physical problems with their environment, such as poor
 quality infrastructure, to social issues such as crime prevention, literacy, or health services.
- Providing Decent Housing This objective focuses on housing activities whose purpose is to meet individual family or community housing needs.
- Creating Economic Opportunities applies to activities related to economic development, commercial revitalization, or job creation.

The system outcome is closely aligned with the objective and helps to further refine the expected result of the objective that is sought. HUD narrowed this to three outcomes including:

- Availability/Accessibility applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low and moderate-income people, including persons with disabilities.
- Affordability applies to activities that provide affordability in a variety of ways to low-and-moderate income people. Affordability is an appropriate objective whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household.
- Sustainability applies to activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low-and-moderateincome or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

The allocation of funds for the following projects are closely aligned with the top housing and community development needs identified in the needs assessment and housing market analysis and through input contributed by stakeholders and citizens who participated in the development of the Consolidated Plan.

Project Areas

#	Project Name
1	Housing Rehabilitation
2	Mortgage Reduction Assistance
3	New Housing Development
4	Tenant-Based Rental Assistance
5	Economic Development
6	Public Services
7	Public Facilities & Infrastructure
8	Planning & Administration
9	Urgent Need / Disaster Response
10	CHDO

Table 2 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The primary obstacle to addressing underserved needs is lack of funds, as there was over \$5.5 million in requests for funding for 2025 and less than half of that amount in expected funds available. The most qualified and eligible applicants were awarded funding based on their financial need for public funding and ability to address the high priority needs of the County determined in the Needs Assessment and Housing Market Analysis sections of the Consolidated Plan and of those needs identified by stakeholders and citizens who participated in the development of the Plan. At least 15% of HOME funds must be used for specific activities undertaken by a special type of non-profit called a Community Housing Development Organization (CHDO). There were no CHDO applicants for 2025.

All funding is contingent upon Federal action on these programs. The CDBG Commission has made the following recommendations if federal CDGB or HOME funding for Dane County either increases or decreases from our projected amounts:

- In the event of an increase of CDBG funds, applicants will receive full allowable amount based on ranking until funds run out.
- In the event of an increase of HOME funds, applicants will receive full allowable amount based on ranking until funds run out.
- In the event of an increase of Public Services funds, applicants will receive full allowable amount based on ranking until funds runout.
- In the event of a decrease in Public Services funds, all other funded applicants will get the same percentage reduction.

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehabilitation			
	Target Area	Urban County Consortium			
	Goals Supported	Increase access to affordable quality housing			
	Needs Addressed	Housing Availability/ Affordability			
	Funding	CDBG: \$245,834.08			
		HOME: \$59,215.92			
	Description	Provide funding for major home rehabilitation and minor home repairs			
	-	for low- to moderate-income persons.			
	Target Date	12/31/2026			
	Estimate the number and type	15 Minor Home Repair; 8 Major Home Rehabilitation			
	of families that will benefit				
	from the proposed activities				
	Location Description	Dane County Urban County Consortium communities			
	Planned Activities	Major Home Repair and Rehabilitation Loan Program (14A); Home			
		Modification (14A); Minor Home Repair Grant Program (14A).			
2	Project Name	Mortgage Reduction Assistance			
	Target Area	Urban County Consortium			
	Goals Supported	Increase access to affordable quality housing			
	Needs Addressed	Housing Availability/ Affordability			
	Funding	CDBG: \$164,862.12			
		HOME: \$49,715.75			
	Description	Promote homeownership for low-and-moderate income households			
	·	through the provision of loans for down payment and closing cost			
		assistance.			
	Target Date	12/31/2026			
	Estimate the number and type	5 Mortgage Assistance			
	of families that will benefit				
	from the proposed activities				
	Location Description	Dane County Urban County Consortium communities			
	Planned Activities	Mortgage Reduction Assistance (3)			
3	Project Name	New Housing Development (Home-building, Rental Construction)			
	Target Area	Urban County Consortium			
	Goals Supported	Increase access to affordable quality housing			
	Needs Addressed	Housing Availability/ Affordability			
	Funding	HOME: \$50,000			
	Description	Promote the development of owner-occupied affordable single-family			
	-	housing units and develop affordable rental housing units			
	Target Date	12/31/2026			
	Estimate the number and type	1 Household will be assisted			
	of families that will benefit				
	from the proposed activities				
	Location Description	Dane County Urban County Consortium communities			
	Planned Activities	1 Household will be assisted			
4	Project Name	Tenant-Based Rental Assistance			
	Target Area	Urban County Consortium			
	Goals Supported	Increase access to affordable quality housing			
	Needs Addressed	Housing Availability/ Affordability			
		n			

	Funding	HOME: \$255,000				
	Description	Assists with Rapid Rehousing, Resources, Program Rental Assistance				
	Target Date	12/31/2025				
	Estimate the number and type	23 Households assisted				
	of families that will benefit					
	from the proposed activities					
	Location Description	Urban County Consortium participating communities.				
	Planned Activities	23 Households assisted with rental assistance				
5	Project Name	Economic Development				
	Target Area	Urban County Consortium				
	Goals Supported	Expand economic opportunities for LMI persons				
	Needs Addressed	Economic Opportunity				
	Funding	CDBG: \$425,145				
	Description	Provide loans for micro-businesses to start-up or grow; provide technical				
		assistance for persons wanting to start a business; expand job training				
		opportunities.				
	Target Date	12/31/2025				
	Estimate the number and type	148 Businesses assisted. 32 jobs created or retained.				
	of families that will benefit	,				
	from the proposed activities					
	Location Description	Urban County Consortium participating communities.				
	Planned Activities	18C: Micro-enterprise business assistance.				
6	Project Name	Public Services				
	Target Area	Dane County Urban County Consortium				
	Goals Supported	Assure access to public services for LMI persons				
	Needs Addressed	Public Services Accessibility				
	Funding	CDBG: \$185,835.30				
	Description	Provide needed public services to persons with low-and-moderate				
	-	incomes, particularly those with special needs; and provide job training,				
		transportation, and crime victim services.				
	Target Date	12/31/2025				
	Estimate the number and type	295 Individuals assisted				
	of families that will benefit					
	from the proposed activities					
	Location Description	Urban County Consortium communities				
	Planned Activities	IDIS Matrix Codes: 05A, 05E, 05H, 05G, 05Z				
7	Project Name	Public Facilities & Infrastructure				
	Target Area	Dane County Urban County Consortium				
	Goals Supported	Improve public facilities/develop infrastructure				
	Needs Addressed	Public Facilities and Improvements				
	Funding	\$0				
	Description	Improve public facilities/develop infrastructure. There were no				
		applications for Public Facilities for 2025; but this project category is				
		reserved for future years during the 2025-2029 Consolidated Plan.				
	Target Date					
	Estimate the number and type					
	of families that will benefit					
	from the proposed activities					
	Location Description	Dane County Urban County Consortium.				
	Planned Activities	03 Public Facility or Improvements				

8	Project Name	Planning & Administration
	Target Area	Dane County Urban County Consortium
	Goals Supported	Strong Program Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$217,780.40
		HOME: \$55,190.89
	Description	Provide program planning, administration, support services, and fair
		housing activities. \$10,000 of the Planning/Administration budget has
		been specifically allocated to Fair Housing activities.
	Target Date	12/31/2025
	Estimate the number and type	N/A
	of families that will benefit	
	from the proposed activities	
	Location Description	Dane County Urban County Consortium.
	Planned Activities	Planning (20); General Program Administration (21A); Fair Housing
		Activities (21D).
9	Project Name	Urgent Need / Disaster Assistance / CHDO
	Target Area	Dane County Urban County Consortium
	Goals Supported	Urgent Need Response to Natural Disasters
	Needs Addressed	Disaster Assistance
	Funding	CDBG: \$54,445.10
		HOME: \$82,786.34
	Description	Set aside funds to a TBD sub-recipient agency in case of a natural disaster
		or emergency situation, and CHDO (Community Housing Development
		Organization
	Target Date	12/31/2025
		N1/A
	Estimate the number and type	N/A
	of families that will benefit	N/A
	of families that will benefit from the proposed activities	
	of families that will benefit	Dane County Urban County Consortium.

AP-50 Geographic Distribution - 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The Dane County Urban County Consortium, as of 2024, includes 56 participating municipalities representing slightly over 94% of the population outside the City of Madison. These cities, villages, and towns along with various departments in Dane County are the major public agencies responsible for administering programs covered by the Annual Action Plan. For a list and map of the 56 participating municipalities, see Appendix 1.

There is no geographic preference for the allocation of 2024 CDBG and HOME funds. Funding is based geographically only in that an application is received from a participating municipality for a project primarily benefitting low-and-moderate income households that meets the priorities of the Consolidated Plan and is recommended by the CDBG Commission.

Geographic Distribution

Target Area	Percentage of Funds
Dane County Urban County Consortium	100

Table 3 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As an urban county consortium, Dane County works on behalf of the 56 municipalities participating in the consortium agreement.

Discussion

For a list of the 56 municipalities participating in the Dane County Urban County Consortium, see attachment in this report.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

Per the recent Dane County Regional Housing Study Strategic Action Plan 2024-2028, cost burden in Dane County is high due to the severe housing shortage. One in four households in Dane County are housing-cost burdened, meaning they spend more than they can afford on housing costs. Over 40% of those households are considered "severely cost burdened", meaning they spend more than half their income on housing costs (Census, HUD). Also, increased household demand and limited housing supply have resulted in increasing home prices and rents. From 2010 to 2022, the median home price in Dane County increased from \$226,000 to \$369,000. The \$181,000 price increase in median home values within Dane County far exceeded the \$123,000 increase in median home price observed statewide (Zillow, 2022). The Consolidated Plan section MA-15 pulled ACS data from HUD, which shows the median home price as lower than in 2022.

In addition to housing cost burden, many owners struggle to make necessary major home repairs. The price per square foot of single-family houses in Dane County has increased from \$224 in 2023 to \$248 in 2024 (see chart in Con Plan section MA-15 for a breakdown of housing costs). This makes purchasing a home difficult for low- and moderate-income families, and leaves many owners without the equity necessary to obtain a loan for major home repairs.

One Year Goals for the Number of Households to be Supported				
Homeless	0			
Non-Homeless	52			
Special-Needs	0			
Total	52			

Table 4 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through				
Rental Assistance	23			
The Production of New Units	1			
Rehab of Existing Units	23			
Acquisition of Existing Units	5			
Total	52			

Table 5 - One Year Goals for Affordable Housing by Support Type

Discussion

Affordable housing continues to be a priority for Dane County. In 2025, Dane County anticipates using CDBG and HOME funds to increase the supply and availability to affordable housing units for low and moderate income families, the elderly, and persons with disabilities. This goal will be met through a variety of activities including major and minor home repair projects, mortgage reduction programs, the production of a new housing unit, and tenant-based rental assistance.

AP-60 Public Housing - 91.220(h)

Introduction

In 1972, the Dane County Housing Authority (DCHA) was formed with the purpose of serving low-income families in Dane County (outside the City of Madison) with affordable housing. DCHA is governed by a five-member citizen commission appointed by the Dane County Executive.

130 units of housing in Dane County are owned by the Dane County Housing Authority (WI214), with 102 of those units being public housing units. 86 units are funded by the Department of Housing and Urban Development's (HUD) Low Rent Public Housing Program. 16 units are elderly-units funded through HUD Project Based Section 8 Rental Assistance. 28 units give preference to Section 8 Housing Choice Voucher participants and are at market rate.

The Section 8 Housing Choice Voucher Program has 1,248 vouchers and is managed by the DCHA. Due to the COVID-19 pandemic, the DCHA administered extra vouchers to serve individuals staying in shelters or living outdoors. Currently, the DCHA is able to provide financial assistance to 1,067 low-income households in Dane County. In order to manage and maintain units, the DCHA has contracted with Wisconsin Management since 1996.

The Deforest Housing Authority (WI249) maintains 36 units of public housing. Of the 36 units, 32 of them are one-bedroom units for seniors and individuals with disabilities; 4 of them are two-bedroom duplexes for families.

92 units of public housing for seniors are owned by The City of Stoughton along with USDA Rural Development. Broihahn Management & Consulting, Inc. manages these properties.

In 2020, the Dane County Housing Authority (DCHA) was awarded 153 Mainstream Vouchers given to households that have a non-elderly adult family member with a disability (DCHA 5-Year Plan 2025-2029). These vouchers are provided for eligible households on the waiting list that are currently homeless, institutionalized, or in danger of institutionalization. In 2021, DCHA, in partnership with the Community Development Authority of the City of Madison (CDA) and the Homeless Services Consortium of Dane County (HSC), was awarded 45 Emergency Housing Vouchers (EHV) which are targeted towards families. Beneficiaries of DCHA's Mainstream and Emergency Housing Vouchers have the ability to lease anywhere in Dane County without needing to report to the Madison CDA, allowing those individuals to utilize extensive social service and transportation linkages within the City of Madison.

The individuals or families who are issued vouchers have had a referral from the CDA through the HSC and are experiencing homelessness, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Those who have been recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability are also eligible for vouchers.

Actions planned during the next year to address the needs to public housing

As stated in <u>DCHA's 5-Year Plan</u>, one of the biggest needs for residents living in public housing is better living conditions (2025-2029). Conditions of units are defined as 1. A lack of complete kitchen facilities, 2. A lack of complete plumbing facilities, 3. More than one person per room, 4. Cost burden greater than 30%. Due to this need, one of the ongoing initiatives has been to "assess physical condition of properties and develop strategies to address and fund deferred maintenance" (DCHA 5-Year Plan 2025-2029).

DCHA commissioned a capital needs assessment of the 86 units of public housing in July of 2021 and has been working to address deferred maintenance and improve the physical condition of the housing stock. Capital funds from HUD as well as a grant of approximately \$2.5M from Dane County are available to continue making improvements. The REAC score for the property improved during a January 2022 HUD inspection and renovations are ongoing.

DCHA was eligible for and was awarded Shortfall Funding from HUD to allow the agency to build a reserve account to support the public housing properties. The balance of this account is currently over \$700,000 and continues to grow each month with the funds DCHA was awarded from HUD.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Programs for DCHA's public housing residents are currently limited; however, all residents of Dane County's public housing units are deemed members of our Resident Advisory Board and are encouraged to provide feedback on the agency's annual plan, 5-year plan, and 5-year capital plans.

One of the DCHA 5-Year Plan 2025-2029's goals is to promote self-sufficiency and economic opportunity. In addition, program participants fund an escrow account with HAP savings that can be used as a down payment on a home, a vehicle, debt reduction or other financial goals at program graduation. In partnership with the Community Development Authority (CDA), they are able to help meet this by expanding the Family Self Sufficiency (FSS) program. In 2020 DCHA brought the staffing in house for the shared FSS program which are Housing Choice Voucher clients from both agencies. Previously, this work had been contracted to a third-party agency, however the provider experienced a high amount of turnover resulting in inconsistent case management for participants. The program was only meeting the minimum necessary to qualify for the grant and did not maximize the effectiveness of the program. Since, the program has been able to expand to include a project-based Section 8 development located in the City of Madison. The Program Coordinating Committee has expanded membership to provide more community connections and participant resources continuing increased overall participation and additional growth planned.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

DCHA had been rated a troubled PHA, but it was upgraded to financially substandard in 2024 by HUD. Dane County has provided funding to help improve DCHA's public housing stock as well as to potentially help fund an additional position at the PHA.

Discussion

Dane County serves numerous low-income families in Dane County (outside the City of Madison) with affordable housing through public and assisted housing from the Dane County Housing Authority, the Deforest Housing Authority, and the City of Stoughton. There are many housing vouchers available for units in areas such as Sun Prairie, Mount Horeb, Marshall, Black Earth, Belleville, and Mazomanie. One of the biggest needs in public housing is improvements in living conditions, and Dane County has progressed in these improvements and has expressed commitments to continue doing so. HUD has supplied DCHA with funds to support public housing properties, and DCHA will use these funds to continue improving the living conditions for LMI families in public housing. Dane County will also continue to encourage those in public housing to be involved in homeownership and management.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

In 2023, both the City of Madison and Dane County contributed funds to hire a vendor to help the community development a revised Community Plan to Prevent and End Homelessness - Dane Forward. The purpose of the plan was to create a comprehensive roadmap to prevent and end homelessness over the next five years. It is intended to provide transparency to the general public, government officials, and nonprofit and business partners about funding, programs, and priorities to meet this objective. The plan is the result of a year of work by stakeholders and partners from throughout the County and the Homeless Services Consortium, in partnership with Homebase. A Community Plan Committee was formed and the group agreed to a strategic plan vision statement: "Create a solutions-based response that deconstructs and disrupts housing inequities so everyone unhoused has a safe and stable place to thrive.' The team emphasized the importance recognizing those with lived experience voices, equity and disparities in the system, and trauma informed principles to guide the work. There are five main goals in the plan:

- 1. Educate and empower the community while evaluating and addressing disparities in our homeless system of care.
- 2. Increase housing programs and solutions for residents experiencing homelessness.
- 3. Coordinate and strengthen the homeless response system.
- 4. Increase and diversify funding to expand available resources.
- 5. Expand regional coordination.

The Plan was finalized in March 2024 and approved by the HSC Board of Directors. The Plan in its entirety can be accessed on the Homeless Services Consortium (HSC) web site at: https://www.danecountyhomeless.org/governance

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Coordinated Entry list is one way our community measures homelessness. Coordinated Entry is a process developed by the local homeless system of care to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred and connected to housing and assistance based on their strengths and needs. Individuals identified must be sleeping in emergency shelter, outside, or in a vehicle and have experienced long-term homelessness. Street outreach programs act as mobile hubs for Coordinated Entry to connect people to housing opportunities as quickly as possible. The HSC has recently taken steps to strength outreach services by increasing coordination, collaboration and meeting regularly. Once assessed, the household is prioritized based on vulnerability assessment and placed on the Coordinated Entry List. Currently, the tool utilized in Dane County to identify and prioritize those individuals is called the VI-SPDAT or the Vulnerability Index Service Prioritization Decision Assistance Tool; however, the CoC is planning to transition to a new assessment in the near future.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Dane County Urban County Consortium does not receive funding through the Emergency Shelter Grants (ESG) program. However, the local community does receive funding through the City of Madison to do similar programming. The Homeless Services Consortium functions as the local Continuum of Care (CoC), recognized by the U.S. Department of Housing and Urban Development (HUD) as the local planning and decision-making body on programs funded with HUD's homeless assistance programs.

Emergency shelter and transitional housing programs in Dane County that report demographic data on persons served include:

- Emergency Shelter Programs (ESP)
 Domestic Abuse Intervention Services; Porchlight Men's Drop-In Shelter and Safe Haven; The Road Home Family Shelter; The Salvation Army Single Women shelter, Family Shelter &
 - Road Home Family Shelter; The Salvation Army Single Women shelter, Family Shelter & Warming shelter, and Motel vouchers; Youth Services of Southern Wisconsin Volunteer host homes; and YWCA Family Shelter.
- Transitional Housing Program (THP)
 DAIS Empower Home; Porchlight Veterans THP (Spring Street), Safe Haven SRO; The Salvation Army Holly House; Society of St. Vincent de Paul; Tellurian Community Based Residential Facility (CBRF); and YWCA Third Street.
- Rapid Re-Housing (RRH)
 Community Action Coalition RRH & Supportive Services for Veteran Families (SSVF); Focus
 Counseling RRH & TBRA; The Road Home Building Futures, The Heart Room, and RISE; The
 Salvation Army RISE, DAWNS, and Hearts of Hope (DV); United Way Partnership YWCA Family
 Housing Stability Program.
- Permanent Supportive Housing (PSH)
 DCDHS Rental Assistance and Supportive Services, Housing Initiatives Permanent Housing for Chronically Homeless, Porchlight HOSTS and Housing First Leasing; Tellurian – Willy Street SRO, PHP (Permanent Housing Program) Consolidation; YWCA – SROs for women (Mifflin St).
- Other Permanent Housing (OPH)
 Housing Initiatives scattered sites (Britta, Calypso, Dayton, Las Casitas, Stonebridge); Porchlight
 Brooks Street, Truax and scattered sites; The Road Home Foundations and Housing & Hope,
 Housing Stabilization, Moving Up, Ace Apartment, The Breese Apartments, Tailor Place
 Apartments, Fair Oaks Apartments, and Mainstream Voucher Program (MVP) Section 8 subsidy
 vouchers.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were

recently homeless from becoming homeless again

As noted above, the Dane County Homeless Services Consortium (HSC) provides information, support, resources and data that assist homeless individuals and families in finding and transitioning to housing. In addition, the organizations list previously help to provide shelter, transitional housing, and rapid re-entry to housing for homeless persons. The Dane County HSC, in partnership with the Tenant Resource Center (TRC), uses a Coordinated Entry approach to help prevent homelessness for persons that are housing instable. Specifically, the County's Eviction Prevention Coordinated Entry Program is operated by the (TRC) and offers both walk-in, email, and telephone assistance. Eviction Prevention Coordinated Entry (CE) is the first point of access that people should contact if they have received a notice to vacate and are at risk of being evicted from their home. Through this intake system, Eviction Prevention CE staff will determine eligibility for assistance from several participating organizations and uses an assessment tool to determine vulnerability. Eviction Prevention CE services may include financial assistance, information about tenants' rights, mediation, referrals to an attorney who specialized in housing law, and short-term housing case management. TRC also leads the Eviction Diversion and Defense Partnership (EDDP), which aims to improve housing stability for Dane County tenants by providing housing support, housing counseling, court navigation, mediation services, and rental assistance. They also refer eligible tenants whose housing stability is at risk to partner attorneys who provide legal representation at no cost to tenants.

The Dane County Affordable Housing Development Fund (AHDF) was established in 2015. The purpose of the AHDF is to encourage the development of affordable housing throughout Dane County by using the fund as a means to leverage additional resources from project partners. Since its inception in 2015, the AHDF has awarded over \$41 million dollars to more than 30 projects, and supported the creation of 2547 affordable units in Dane County.

In 2023, more than \$10.8 million in County funds were awarded to eight affordable housing projects that will create 458 new affordable housing units; 410 of the new units will be in the City of Madison, and 48 of the units will be located outside the City of Madison in urban county consortium communities. These projects specifically target individuals and families on the Dane County Homeless Service Consortium's community by-name list.

The list of Transitional Housing Programs (THP), Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH), and Permanent Housing (PH) is mentioned in the prior question.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs.

According to HUD reports, the number of individuals who are identified as at-risk (receiving financial aid or services to prevent homelessness) increased significantly over the past few years. This is due to the hardships of and additional funding provided due to the COVID pandemic. Preventing homelessness has become an increasingly difficult issue in Dane County due to increasing barriers related to unemployment, low-paying jobs, limited subsidized housing units, low vacancy rate, and increasing housing costs in the market. In 2022, 6,006 households received diversion services, financial assistance, legal support or other services to help them avoid homelessness. This number decreased to 4,020 households served in 2023. The decrease was due to less funding available for rental assistance through the US Treasury.

Receiving an eviction notice is the primary reason households seek prevention services. According to a report from the Homeless Management Information System (HMIS), of those seeking assistance in 2023, 41% of the adults in the household had reported earning wages and 21% reported receiving SSI or SSDI payments. Nearly all of those households reported having incomes below 30% of the area median income, less than \$2,000 a month including 32% of individuals with no income. Approximately one-quarter of these households had a full-time wage earner and one-quarter had a part-time wage earner. More than half of the adults in households seeking prevention services were unemployed. According to the FY 2024 NOFO, Homeless Management Information System (HMIS) reports used by the CoC identifies households who have returned to homelessness. Several factors have been identified as a possible cause to a return to homelessness such as eviction and criminal history, availability of subsidized housing, accessible units, and households with five or more members.

Discussion

Preventing homelessness has become an increasingly difficult issue in Dane County due to increasing barriers related to unemployment, low-paying jobs, limited subsidized housing units, and increasing housing costs in the market. Young adults and the elderly are also at risk of becoming homeless. Per the Regional Housing Study Strategic Action Plan 2024-2028, there is a need for 13,300 additional rental units affordable to households at or below 30% of Area Median Income. Many County and community partners are working to build capacity and implement policies and programs to support access to housing and affordable housing objectives. In addition, many social service organizations are providing critical assistance to vulnerable residents and first-time homebuyers.

AP-75 Barriers to affordable housing - 91.220(j)

Introduction:

Dane County published The Analysis of Impediments to Fair Housing Choice (AI) which discusses impediments to fair housing choice in the public and private sector in Dane County. It mentions that public and private policies also contributed to concentrations of low-income communities of color. Planning and zoning created separated enclaves of large blocks of multi-family housing along highways and arterial roadways. Such blocks of lower value land foster lower quality construction and distant ownership that, over time, lead to concentrated low-income housing. Siting of affordable housing in low-income areas adds to the concentrations. Barriers to high opportunity areas, including higher housing prices, lack of affordable housing and planning and zoning that limits lot sizes or percentage of multi-family housing reduces availability of affordable housing in some high opportunity areas. Lack of public transportation, and consequent higher transportation costs, further limit access to many high opportunity communities. Finally, community opposition to affordable housing also limits access.

More recently, the Regional Housing Study Strategic Action Plan 2024-2028 identified from community surveys that "over 80% of respondents have experienced barriers that prevent them from living in their preferred housing type. Approximately 57% indicated their preferred housing type is too expensive. Nearly 37% cited the competitive housing market as a barrier." Dane County supports programs that offer down-payment assistance in order to reduce barriers.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Dane County has taken several actions to address the potential barriers to affordable housing. For rental units constructed using HOME funds, Dane County requires that developers enter into a land use restriction agreement that ensures that HOME units are designated for low-income households. The HOME units are also required to meet the requirements of 24 CFR §§92.251 through §§92.253 for at least 20 years (i.e., period of affordability) from the date upon which the HOME units are available for occupancy. To ensure that these and other requirements are met regardless of the property owner, the restriction are tied to the land and are binding upon future owners during the period of affordability.

Dane County also provides zero-interest, deferred loans for Mortgage Reduction Assistance and for Major Home Rehabilitation projects. The loans are subject to an affordability period and recapture. Recapturing enables the homeowner to not be restricted in the sale of the home, and thereby helps lower their barrier to acquiring new housing and building upward economic mobility for low- and moderate-income

households.

Lastly, Dane County has allocated \$10 million to the Affordable Housing Development Fund (AHDF) to encourage the development of affordable housing throughout Dane County by using the fund as a means to leverage additional resources from project partners.

Dane County will continue to fund a sub-recipient organization to perform fair housing services that address impediments identified in the Analysis of Impediments to Fair Housing Choice in Dane County.

Applications for housing, and the resulting units, to be assisted with CDBG and HOME funds will be reviewed to assure that the housing is fully available to all residents of the community, regardless of race, color, national origin, gender, handicap, or familial status.

Discussion:

In 2024, Dane County used CDBG/HOME funds to help rehabilitate 40 existing owner-occupied housing units as a means to maintain affordable housing; promote homeownership for 15 LMI households by providing down payment and closing cost assistance to LMI families residing in Dane County outside of Madison. Dane County will continue to seek partner organizations to help launch a tenant-based rental assistance (TBRA) program to advance the goals of the Consolidated Plan and further address the affordable and fair housing needs of the Urban County Consortium. Two organizations will be funded for TBRA activities in 2025.

Dane County anticipates using \$410,210 in CDBG funds and \$413,931 in HOME funds in 2025 to increase the supply and availability of affordable housing units for low- and moderate-income families, the elderly, and persons with disabilities. An additional \$10,000 of CDBG funds will be used specifically for fair housing activities in the Urban County Consortium.

AP-85 Other Actions – 91.220(k)

Introduction:

Dane County will engage in a variety of activities during the 2025 program year, which are intended to further local housing and community development goals.

Actions planned to address obstacles to meeting underserved needs

Dane County will continue to provide assistance funding to private sector and non-profit organizations that support the goal of increasing the availability of affordable housing units as described in the Strategic Plan section of the 2025-2029 Consolidated Plan. This includes not only affordable housing units, but also ensuring that programs maintain mortgage reduction services. In addition, Dane County recently published a Regional Housing Study and Strategic Action Plan 2024-2025. Our office will work closely to align with the plan's goals and outcomes. Some of the underserved needs included a shortage of housing units, including rentals, and an increase in housing/rental costs.

Based on our Consolidated Plan, and Annual Action Plans, we are placing more of an emphasis on ensuring that housing is more accessible and affordable. Our division has also spearheaded tenancy addendums to prevent unnecessary evictions, as well as community education on landlord/tenants' rights. Dane County also received additional funding for the Affordable Housing Development Fund, which will allow for new construction and increased housing units for low to moderate income families.

Applications for housing, and the resulting units, to be assisted with CDBG and HOME funds will be reviewed to assure that the housing is fully available to all residents of the community, regardless of race, color, national origin, gender, handicap, or familial status. Dane County will continue to fund a sub-recipient organization to perform fair housing services that address other impediments to housing. In 2024, the \$10,000 fair housing services contract was awarded to the Milwaukee Metropolitan Fair Housing Council (MMFHC). The methods on which the services were provided by MMFHC include Investigation and Enforcement Services; Training and Technical Assistance; and, Education and Outreach Services.

Actions planned to foster and maintain affordable housing

Affordable housing continues to be a priority for Dane County. In 2025, Dane County anticipates using CDBG and HOME funds to increase the supply and availability of affordable housing units for low- and moderate-income families, the elderly, and persons with disabilities. This goal will be met through a variety of activities including major and minor home repair projects, mortgage reduction programs, new rental construction, rental rehabilitation, and tenant-based rental assistance.

Actions planned to reduce lead-based paint hazards

Dane County works to reduce lead-based paint hazards through making sure housing is lead-safe and by

improving the detection and treatment of lead poisoning in children.

Dane County requires, via the agreements with subrecipients, compliance with the Lead-Based Paint requirements set forth in 24 CFR Part 35. This includes meeting the requirements for notification, identification and stabilization of deteriorated paint, identification and control of lead-based paint hazards, and identification and abatement of lead-based paint hazards. The Protect Your Family From Lead in Your Home pamphlet developed by the EPA, HUD, and the U.S. Consumer Product Safety Commission is also distributed.

Prior to funding, all housing projects undergo Program Reviews to determine the scope of the project; year the house was built (before/after 1978); type of person(s) to be occupying the house or otherwise impacted by the housing use (i.e. elderly, children under the age of 6, or others at greater risk for lead exposure). Inspectors utilize a questionnaire to determine compliance with all lead-based paint requirements, including specific requirements based on levels of rehabilitation assistance provided; furthermore, if abatement is required, contractors must hire firms that are licensed in lead abatement.

The Wisconsin Department of Health and Family Services maintains an on-line database registry of properties that have been certified as Lead-Free/Lead-Safe. This Wisconsin Asbestos and Lead Database Online, known as WALDO, is of housing (single-family and apartments) and child occupied facilities, such as day care centers, that meet the lead-free or lead-safe property standards established under the State Administrative Code.

The Public Health Department of Madison and Dane County Childhood Lead Poisoning Prevention Program works at the following goals:

- Preventing exposure to lead hazards;
- Assuring that Dane County children receive blood lead screening;
- Assisting families when a child is lead poisoned;
- Analyzing lead poisoning issues in Madison and Dane County.

The Department works to prevent lead exposure by educating Dane County residents, property owners, and contractors on the hazards of lead and ways to minimize or eliminate lead hazards. This is done through one-to-one consultation and group presentations.

Actions planned to reduce the number of poverty-level families

Dane County will continue to support accessible and affordable housing, and prioritize services to reduce the number of poverty-level families. Services will include economic assistance for businesses, workforce development and job training, family support and social services, down-payment assistance, and access to food pantries, shelters, etc. Families and individuals will increase skill sets and access to resources that

will promote further opportunities to reduce poverty.

Other actions include increased funding from Dane County to support Fair Chance Housing and the Affordable Housing Development Fund. Dane County also received in 2025 a federal housing grant which will allow for improved zoning and additional affordable housing developments.

Actions planned to develop institutional structure

Dane County, as an urban county, is well positioned to coordinate the work of public, private, and non-profit organizations through which it will carry out the Consolidated Plan and Annual Action Plan. In 2023, Dane County's Housing Access & Affordability Division has grown from 5 employees to 13 full-time employees. This is a result of Dane County's commitment to improving the internal structures and capacity in order to meet the increasing demands of affordable housing and addressing the needs of those who are homeless or at risk of being homeless. In 2025, the Division will continue to strengthen positions and resources.

The Dane County Urban County Consortium, as of 2024, includes 56 participating municipalities representing slightly over 96% of the population outside the City of Madison. These cities, villages, and towns along with various departments in Dane County will be the major public agencies responsible for administering programs covered by the Consolidated Plan.

Actions planned to enhance coordination between public and private housing and social service agencies

In 2025, Dane County continues to participate as a member of the Home Buyers Round Table of Dane County, Inc., a non-profit member organization whose mission is to promote and educate the Dane County community about home ownership. Members include housing industry representatives that believe home ownership will increase family stability and financial security; stabilize and strengthen communities and neighborhoods; and generate jobs and stimulate economic growth.

Dane County also continues to participate in the Homeless Services Consortium (HSC) on both the Funders and Service Providers groups. The HSC has recently taken steps to strengthen outreach services by increasing coordination, collaboration and meeting regularly, and will continue these actions.

The CDBG/HOME unit is within the Dane County Department of Human Services (DCDHS). We are continually connecting with other Divisions to leverage and promote services to low- and moderate-income families. In 2024, CDBG/HOME team engaged in more meaningful discussions with Joining Forces for Families (JFF). JFF has offices embedded within communities where social services resources may be needed the most. They offer direct support to families, and provide referrals to housing providers. The CDBG/HOME team is excited about this partnership with JFF, as it will help with outreach and information

in 2025.

Our Division also continually coordinates with the Dane County Housing Authority (DCHA) as well as with homeless service providers, HSC and the City of Madison, to enhance the process of providing Emergency Housing Vouchers (EHV) (targeted towards families). Starting in 2021 there was an agreement that EHV holders may lease anywhere in Dane County without needing to port specifically Madison. This allows target populations for these vouchers to take advantage of more extensive social service and transportation linkages the City of Madison provides. Vouchers have been issued to individuals or families who are experiencing homeless, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking. Eligibility was also expanded to include those recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

Discussion:

Through activities mentioned in this section, combined with recent Dane County efforts and strategy action plans, the CDBG/HOME team will be supporting projects that reduce barriers to housing and increase accessibility. We also plan to continue to collaborate and network with the Dane County Urban County Consortium, service providers, and community members in order to meet our goals.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.220(I)(1,2,4)

Introduction:

Dane County periodically receives additional funds in addition to the annual CDBG/HOME federal grant allocation in the form of program income (any proceeds received by Dane County and/or it's subrecipients directly generated from the use of CDBG/HOME funds) and recaptured funds from loan payments, payoffs, and unexpended prior year funds. These funds are reallocated to eligible CDBG/HOME activities. CDBG regulations require that, at the end of each program year, grantees must determine whether they have excess program income on hand and return any excess to its line of credit.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1.	The total amount of program income that will have been received before the	\$150,000
	start of the next program year and that has not yet been reprogrammed	
2.	The amount of proceeds from section 108 loan guarantees that will be used	\$0
	during the year to address the priority needs and specific objectives identified	
	in the grantee's strategic plan	
3.	The amount of surplus funds from urban renewal settlements	\$0
4.	The amount of any grant funds returned to the line of credit for which the	\$0
	planned use has not been included in a prior statement or plan.	
5.	The amount of income from float-funded activities	\$0
6.	Total Program Income	\$150,000

Other CDBG Requirements

1.	The amount of urgent need activities	\$54,445.10
	The amount of digent need detivities	757,775.10

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

- A description of other forms of investment being used beyond those identified in Section 92.205 is as follows: Not applicable.
- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Dane County will use the recapture provisions to recoup all or a portion of the assistance provided to homebuyers if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit and the net proceeds are not sufficient to recapture the full HOME investment, then Dane County will recapture the net proceeds, (if any).

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Dane County will use the recapture provisions to recoup all or a portion of the assistance provided to homebuyers if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit and the net proceeds are not sufficient to recapture the full HOME investment, then Dane County will recapture the net proceeds, (if any).

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable to 2025 HOME funding.

- If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
 N/A
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

 N/A
- 7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a). N/A