

Program Guide

SECTION 1: GENERAL AGENCY INFORMATION



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacscw.org



Mission

To transform our communities by fostering conditions where everyone can achieve social and economic security.

Vision

Just and equitable social and economic conditions across our communities.

Our Values

We believe in Equity, Respect, Dignity, and Transformation.

Tag Line

Opportunity starts here.

Our Mission:

To transform our communities by fostering conditions where everyone can achieve social and economic security. Founded in 1966, the Community Action Coalition for South Central Wisconsin, Inc (CAC), has created and operated a wide variety of program aligned with its mission. CAC builds on the strengths, assets and capacities of low-income individuals and families to evolve the community system more equitably. CAC is committed to helping people develop the capacity, knowledge, and skills necessary to improve the quality of life for our clients and our community.

Who we are:

Community Action Agencies like CAC was established as part of the Economic Opportunities Act of 1964. CAC was formed in 1966 as the Community Action Coalition for the County of Dane and the City of Madison. CAC was expanded to Jefferson County in 1992 (and became Community Action Coalition for South Central WI, Inc), and Waukesha County in 1996. CAC is a member of the Wisconsin Community Action Program Association (WISCAP), which coordinates all 16 of Wisconsin's Community Action Agencies. client

Administrative Structure:



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Community Action Coalition is a 501© 3 non-profit organization, governed by a tripartite Board comprised equally of public officials, low-income representatives, and individuals from the private sector.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



SECTION 2: GENERAL INFORMATION

Purpose of this Manual:

The purpose of this manual is to describe and outline the programs and internal policies of Community Action Coalition. The aim is to provide standard concepts, definitions, and procedures to enable staff to understand and effectively administer programs. This manual is designed to be used as a tool to train new staff and as a reference and resource for existing staff. It is also a public document and will be made available upon request to partner agencies, funders, clients, and others who wish to read the procedures related to CAC operations.

This manual will be updated on a regular basis to reflect both changes in CAC's policies and procedures, as well as any new regulations by funders, notices, and other guidance.

Housing First:

Community Action Coalition uses the Housing First approach. Housing First is a homeless assistance approach that prioritizes providing permanent housing to people experiencing homelessness swiftly with few to no treatment preconditions, behavioral contingencies, or other barriers. Therefore, access to CAC's programs is not contingent on sobriety, minimum income requirements, lack of criminal record, completion of treatment, history of domestic violence, or other unnecessary conditions.

CAC does not consider poor credit or financial history, poor lack of rental history, criminal convictions, or behaviors that are interpreted as indicating a lack of "housing readiness" when evaluating eligibility.

It is CAC staff's discretion to evaluate evidence provided by the applicant and make determinations about eligibility.

Homeless Definition:

HUD currently has 4 criteria for defining homeless, they are as follows:

Category 1: Literally Homeless

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



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation.
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
- (iii) Is exiting an institution where they have resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminent Risk of Homelessness

- (2) Individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) Residence will be lost within 14 days of the date of application for homeless assistance.
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3: Homeless under other Federal statutes

- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - (i) Are defined as homeless under the other listed federal statutes.
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application.
 - (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days: and
 - (iv) Can be expected to continue in such status for an extended period due to special needs or barriers

Category 4: Fleeing/Attempting to Flee DV

- (4) Any individual or family who:
 - (i) Is fleeing, or is attempting to flee, domestic violence.
 - (ii) Has no other residence; and



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



(iii) Lacks the resources or support networks to obtain other permanent housing

At Risk of Homelessness Definition:

An individual or family who:

- (i) Has an annual income below 30% of median family income for the area; AND
- (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
- (iii) Meets one of the following conditions:
 - a. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - b. Is living in the home of another because of economic hardship; OR
 - c. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - d. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
 - e. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
 - f. Is exiting a publicly funded institution or system of care; OR
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan

Chronically Homeless Definition:

Chronically homeless is defined as an individual who:

- 1.) Is a “homeless individual with a disability” which is defined as being both homeless and having a disability that meets the disability requirements below

The applicant must meet the HUD definition by having a disability that:

- is expected to be long-continuing or of indefinite duration;



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- substantially impedes the individual's ability to live independently;
 - could be improved by the provision of more suitable housing conditions; and
 - is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post traumatic stress disorder, or brain injury;
 - is a developmental disability; or
 - is the Human Immunodeficiency Virus (HIV) or any condition arising from the etiologic agency from HIV.
- 2.) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter.
- 3.) Has been homeless for at least a total of 12 months continuously or on at least four separate occasions in the last three years. According to regulation, this is defined by the individual having been homeless and living like this continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter. Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility.

Other circumstances:

- An individual who meets all criteria for paragraph (1), (2), and (3) but is currently residing in an institutional care facility such as a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days, meets the criteria for chronically homeless.
- A family with an adult head of household (HOH) (or if there is no adult in the family, a minor HOH) who meets all of the criteria in paragraph (1), (2), and (3), including a family whose composition has fluctuated while the HOH has been homeless, meets the criteria for chronically homeless.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Program Components:

Rental Assistance- CAC has different funding sources and is responsible for the overall management of the programs. Specifically, CAC is responsible for; (1) developing and implementing COC, EHH, and local policies and procedures with guidance; (2) managing all aspects of the clients housing assistance, including conducting eligibility determinations, annual recertifications, inspections, calculating tenant rent and HAP payments, and paying landlords; (3) managing grant funds; (4) maintaining relevant data on program clients and compiling all required reports for each grant and; (5) proving case management services, and coordinating with services provider agencies.

Supportive Services- Community Action Coalition is required to provide supportive services for the clients to enable them to live as independently as is practicable throughout the duration of their residence in the project. Case management must be determined before housing assistance is received.

Program Goals and Objectives:

Priority Area	Goals	System Strategies
Agency	Develop new funding streams to promote self-sufficiency as an organization. <i>Goal 7</i>	Mobilize and engage our community to transform community conditions related to food, housing, income, and support services.
	Cultivate strong partnerships with volunteers and local organizations. <i>Goal 4</i>	
	Empowered, professional, well-trained staff who have voice and stake in the organization. <i>Goal 5</i>	Create new structures for staff, participants, and volunteers to have a voice and stake in CAC and our community.
Community	Low income people have a voice and stake in the community. <i>Goal 3</i>	



	<p>Transform community conditions to promote social and economic security. <i>Goal 2</i></p>	<p>Improve relationships with people, organizations, sub-systems across our community.</p>
<p>Family</p>	<p>Low-income people have access to opportunities to develop self-sufficiency skills and mindsets. <i>Goal 1</i></p>	
	<p>Low-income people, especially marginalized populations, achieve their potential by strengthening family and other supportive systems. <i>Goal 6</i></p>	

Equal Opportunity and Affirmative Action

As an equal opportunity employer operating under a written Affirmative Action Plan and a Civil Rights Compliance Plan, CAC does not discriminate in its hiring or employment and service delivery because of race, religion, creed, color, ethnic or national origin, ancestry, citizenship, sex, gender identity, age, physical or mental disability/handicap, sexual orientation, marital or parenthood status, veteran status, membership in the National Guard or Reserve component of the military forces of the United States or Wisconsin, arrest or conviction record, use or non-use of lawful products off the agency premises during non-working hours, declining to attend a meeting or to participate in any communication about religious matters or political matters physical characteristics, economic status, or other categories listed under applicable local, state or federal law. All employees are expected to support goals, policies and programmatic activities relating to nondiscrimination in



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



employment.

Our services shall be provided without discrimination in compliance with all applicable local, state and federal laws, including but not limited to, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Titles VI and XVI of the Public Health Service Act, 42 U.S.C. sec 201 et seq.; the Age Discrimination in Employment Act of 1967, the Age Discrimination Act of 1975, the Omnibus Budget Reconciliation Act of 1988 and the Americans with Disabilities Act of 1990, and their amendments. In addition, this agency shall comply with Wisconsin Statutes sec. 16.765, the City of Madison Equal Opportunities Ordinance, and any other applicable local, state, or federal ordinances, statutes, orders, or law relating to equal employment opportunities and affirmative action.

No otherwise qualified applicant for services or service recipient shall be excluded from participation, be denied benefits or otherwise be subject to discrimination in any manner. This policy includes eligibility for and access to service delivery and treatment in all program activities.

It is the policy of this agency to provide language access services to populations of persons with limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by CAC's programs.

Official agency documents (Affirmative Action Plan, Civil Rights Compliance Plan, Cultural Diversity Plan, Hiring Procedures, Fiscal Procedures, and Board Bylaws) are available to all employees upon request from the Human Resources Coordinator.

External Communication:

All public information activities, including such items as social media posting, press releases, requests for press coverage, announcements to the media and responses to media inquiries in an official capacity as a representative of CAC, regarding CAC and its activities, must be reviewed and approved by the Executive Director.

Employees may not communicate with members of the press, in an official capacity as a representative of CAC, without prior approval from the Executive Director.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Section 3: Client Intake

Outreach Policies and Procedures:

Community Action Coalition will make its best efforts to ensure that eligible hard-to-reach homeless persons are served by our programs. Ongoing outreach and engagement procedures have been established through partner agencies for the purpose of engaging with eligible persons so that they may elect to enroll into our programs.

Under Fair Housing regulations, CAC must affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach and maintain records of those marketing activities.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Coordinated Entry:

Coordinated Entry is a process developed to ensure that all people experiencing homelessness/housing crisis, have fair and equal access to housing services and assistance. Coordinated Entry is a method for enrolling individuals and households in our communities experiencing the greatest housing and service needs. This includes individuals and households in our community that have been sleeping in emergency shelters, in a place not meant for human habitation (eg:car), or are fleeing or are attempting to flee domestic violence. Coordinated Entry is the primary intake system for both Dane County, and the Balance of state COC's.

Service provider agencies in the community may refer potential applicants through the Dane County Coordinated Entry system, which is managed by the Dane County Homeless Consortium. Prioritization for housing referrals will be conducted through the referral process using a using an approved assessment.

For all other referrals out of the Dane County Consortium clients are referred in using the Balance of State Guidelines.

For the Balance of State COC to access Coordinated Entry, one may use multiple access points, this approach is known as the **“No Wrong Door”** approach. The “No Wrong Door” approach means that CAC will do what we can to help clients enroll in the coordinated entry process to eliminate potential access barriers for community members.

The following steps are taken by CAC staff to make sure that “No Wrong Door” policy is followed for the Balance of State COC. An CAC intake worker will complete the following:

- 1.) A WI BOSCOG Pre-Screen form is filled out
- 2.) Completion of a VI-SPDAT if the client is homeless
- 3.) Screen issues to ensure there is are no issues related to safety in a domestic violence situation.
- 4.) Have the client fill out or verbally agree to the HMIS Data Entry form
- 5.) Enter data into HMIS.
- 6.) Follow up every 30 days to ensure that the client is still homeless and is in need of housing.

CAC follows all Housing and Urban Development, Wisconsin Department of Administration, Dane County Consortium, and Balance of State guidelines for Coordinated Entry.

Intake:



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



The entry assessment tool used to prioritize referrals is called the VI-SPDAT. The Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), Vulnerability Index & Family Service Prioritization Decision Assistance Tool (VI-F-SPDAT), or Transition Age Youth-Vulnerability Index & Service Prioritization Decision Assistance Tool (TAY-VI-SPDAT) will be used when screening households for Permanent Supportive Housing and Rapid Re-Housing programs in both CoCs.

The complete Service Prioritization Decision Assistance Tool (SPDAT) is recommended as an assessment tool for housing case management and housing programs. SPDAT's should only be administered by trained staff. SPDAT data is subsequently entered into the Homeless Management Information System (HMIS).

After a VI-SPDAT is administered, a referral is made to the community-wide prioritization list. There are two prioritization lists: one for homeless families and one for the homeless individuals. All households referred to the community-wide priority lists are automatically prioritized based on the Order of Priority for each project type established by the Balance of State (BOS) and Dane COC's. Placements.

Program Enrollment:

Placement into a CAC program occurs when a program opening becomes available. At that point, the intake specialist(s) and housing navigator will contact the lead agency to receive referrals from the community wide priority list(s) in both the Balance of State and Dane CoC's.

After a referral is made through Coordinated Entry, the intake specialist will contact the applicant, and case manager, and complete the referral packet which includes the follow documentation:

1. Intake form
2. Identification for all household members over the age of 18
3. Income Verification
4. Documentation of Homelessness
5. Documentation of Coordinated Entry Prioritization
6. HMIS Release of Information
7. Partner Release of Information
8. Termination Procedure
9. Certification of HMIS Entry



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



SECTION 4: PROGRAM DESCRIPTION/OUTLINES

Listed below are snapshots of current CAC programs, all Policies and Procedures are attached.

PSH- WISH PROGRAM- Waukesha County

This program is currently set aside for

- Singles (over the age of 18)
- Category 1 of HUD homelessness with a Disability
- Referrals are generated through the COC Coordinated Entry Process and the COC- wide PSH priority list for individuals.

This funding can be used for

- Moving Costs
- Permanent Housing- Lease with CAC, Sublease with Client
 - Clients are not required to pay rent (per program guidelines), but the agency may set a cap of up to 30% of adjusted income towards rent.

Exit plan

- Show continued housing stability at the program exit
- Must contact client for follow up after exit- at least once
- Supportive Services can continue for up to 6 months after program exit

Transitional Housing- Jefferson County

This program is currently set aside for

- Families and Singles (Head of household must be over the age of 18)
- Category 1,2, or 4 of the HUD homeless definition

This funding can be used for

- Moving Costs
- Housing Assistance for up to 24 months

Exit plan

- Show continued housing stability at the program exit
- Must contact client for follow up after exit- at least once
- Supportive Services can continue for up to 6 months after program exit

Rapid Rehousing- COC



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



This program is currently set aside for

- Singles and Families (Head of household must be over the age of 18)
- Category 1 and 4 of HUD homelessness
- Referrals are generated through the COC Coordinated Entry Process and the COC- wide PSH priority list for individuals.

This funding can be used for

- Deposits
- Property Damage up to 1 months rent
- Rental assistance (up to 12 months)
- First month agency can pay 100% of rent, after the first month the client may be required to pay 30% of their adjusted monthly income toward rent

Exit plan

- Show continued housing stability at the program exit
- Must contact client for follow up after exit- at least once
- Supportive Services can continue for up to 6 months after program exit

Rapid Rehousing- ESG

This program is currently set aside for

- Singles and Families (Head of household must be over the age of 18)
- Category 1 and 4 of HUD homelessness
- Referrals are generated through the COC Coordinated Entry Process and the COC- wide PSH priority list for individuals.

This funding can be used for

- Deposits
- Utility Deposits
- Rental assistance (up to 12 months)
- First month agency can pay 100% of rent, after the first month the client may be required to pay 30% of their adjusted monthly income toward rent

Exit plan

- Show continued housing stability at the program exit
- Must contact client for follow up after exit- at least once
- Supportive Services can continue for up to 6 months after program exit



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Emergency Shelter-Jefferson County

Jefferson County does not have a shelter at this time, due to this CAC receives funding to provide motel vouchers.

This program is currently set aside for

- Families and Singles (Head of household must be over the age of 18)
- Category 1, 2,3 or 4 of HUD homelessness

This funding can be used for

- Motel Vouchers in Jefferson County

Exit plan

- Show continued housing stability at the program exit
- Must contact client for follow up after exit- at least once
- Supportive Services can continue for up to 6 months after program exit

SSVF

Supportive Services for Veterans and Families.

This program is currently set aside for

- Former Active-Duty members, with Honorable, General, or Other than Honorable Discharge
- Homeless or at risk of homelessness
- Income can not exceed 50% area median income for the county they reside in

This funding can be used for

- Rental Assistance
- Deposit Assistance

Exit plan

- Exit Plan Questionnaire is sent out.
- Retention Follow up is required.

Early Childhood Zones

The ECZ program offers intensive, limited-term housing services in Madison's Leopold and Mendota/Northside neighborhoods.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



This program is currently set aside for

- Families that are currently enrolled in a ECZ home visiting program
- And must be referred for housing services by one of the initiative's home-visiting programs.

This funding can be used for

- Short-term rent assistance
- Developing an individualized housing stability plan
- Information and referral
- Helping to remedy any issues that prevent families from securing stable housing.

Independent Living Program

The IL Program offers wrap around services to support former foster care youth obtain independent living skills and self-efficacy.

This program is currently set aside for:

- Jefferson county youth aged 17 ½ -23 who have aged out (or will age out) of the foster care system
- Jefferson County youth who have been adopted or placed under Ch. 48 Guardianship from the Foster Care system after age 16 (and under the age of 23).

This *funding can be used for

- Basic personal necessities
- Housing assistance (security deposit, rent, furniture, small appliances)
- Transportation needs (car insurance, car repair, gas reimbursement, etc.)
- Educational assistance (tuition, books & supplies, laptops, etc.) – *Grant Opportunity*
- Work-related expenses
- Other supportive services (personal document fees, other misc. as needed)

**Funding for the IL program is provided by the WI Department of Children and Families*



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Workforce Innovation and Opportunity Act for Out-of-School Youth (WIOA OSY)

The WIOA OSY Program seeks to support youth in Jefferson County who face barriers to education and employment.

This program is currently set aside for:

- Jefferson county youth aged 16-24 who are eligible to work in the US, are currently out of school, registered for the selective service (if applicable) and have at least one barrier from the program eligibility list.

This *funding can be used for:

- Training-related fees (tuition, books & supplies, gas reimbursement to classes)
- Work-related expenses (uniforms, tools, and testing fees)
- Transportation (bus pass, parking permit, mileage reimbursement, car repairs)
- Childcare
- Housing Assistance

**Funding for WIOA Program is provided by the Workforce Development Board of South-Central WI*

Food Bank/ The Emergency Food Assistance Program:

This program is currently set aside for:

- Clients (currently) at 300% FPL or below and live within a TEFAP pantry's service area (however a pantry isn't necessarily allowed to deny service based on where they live).
- Clients self-report income (so a pantry may not ask for proof of income).
- They do not need to be a citizen or legal resident (a pantry is supposed to ask for IDs for each member of the household, but they should accept a range of IDs).

A pantry must sign the site agreement and comply with the regulations laid out in that agreement and the outlet operators manual. These include:

- Advertising that they are a food pantry by having signs outside the building with open hours and an emergency contact number (can be 211), in certain required languages based on county population



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- Keeping temperature and cleaning logs, storing food safely
- Training all volunteers who interact with clients in civil rights (training provided by the state) and having them sign confidentiality agreements
- Keeping client information private and inaccessible unless absolutely necessary
- Not denying service on the basis of federal and state protected classes
- Posting civil rights information and helping clients file civil rights complaints with the USDA as needed
- Communicating regularly with their EFO (CAC is an EFO for the purposes of TEFAP), which includes submitting monthly service statistics
- They may be located in a place of worship but may not try to convert clients while the pantry is open
- Sourcing at least 30% of their food from a source other than TEFAP (it used to be 50/50, but I think it's 70/30 now)
- Agreeing to facilitate a site visit from the EFO and/or the state at least every other year.

Double Dollars

This program provides EBT card shoppers with a dollar-for-dollar match up to \$25 per market at participating farmers' markets.

This program is currently set aside for:

- Households that have a current EBT card
- Only FoodShare EBT cards can be used
- Different EBT types have different requirements for eligibility, the most common which is FoodShare has eligibility requirements that change just slightly every few years or so to update the income requirements.

Clothing Vouchers

This program is set aside for:

- Households that must be at or below 125% FPL

Koats for Kids



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Koats for Kids is a community-wide effort to provide coats for families in Dane and Jefferson Counties. For the past 35 years, this coat drive has helped area families facing financial hardship by providing them with coats and other winter gear.

This program is set aside for:

- Households with children who complete a CAC intake form.

Learning Lab

Online learning Labs, as well as live in-person labs, ensure you gain proficiency in essential life skills, and enjoy learning along the way. Our instructors are experienced and qualified professionals and are ready to help. Our aim is to provide our shared community with the knowledge vital to equitable outcomes. CAC has a Learning Lab onsite in the Dane County office. This is open to the public at no cost.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



SECTION 5: FAIR HOUSING AND REASONABLE ACCOMMODATIONS

Federal laws require that funded agencies treat all applicants and clients equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. Community Action Coalition will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment. Involuntary family separation (please see below) is prohibited so the age and gender of a child under age 18 must not be used as a basis for denying any family's admission.

Reasonable Accommodations:

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

Reasons for a reasonable accommodation request include:

- Live-in aide is needed
- Additional search time for a unit, as long as reasonable for the purpose
- Higher payment standard or utility allowance
- Initial lease term is shorter than 12 months
- Other needs related to disability

VAWA Protections:

CAC believes survivors and seeks to support all of our clients experiencing domestic violence, dating violence, sexual assault, and stalking.

On March 7, 2013, the Violence Against Women Reauthorization Act of 2013 (VAWA 2013) was signed into law. The law significantly expanded housing protections to victims of domestic



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



violence, dating violence, sexual assault, and stalking across HUD's core housing and homelessness programs. To implement the law's new provisions, HUD issued a final rule, which took effect on December 16, 2016.

CAC does not deny an applicant for admission into any housing program "on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking, if the applicant otherwise qualifies for assistance or admission".

Education of Children and Youth who are Experiencing Homelessness:

The McKinney-Vento Homeless Assistance Act authorizes the federal Education for Homeless Children and Youth (EHCY) Program which includes the following rights for children or Youth experiencing homelessness:

- Right to immediate school enrollment when records are not present
- Right to remain in the school of origin, if in the students best interest
- Right to receive transportation to and from the school of origin
- Right to receive support academic success

Upon intake into a CAC housing program, families will be provided information explaining their rights under the McKinney-Vento Act. Within Wisconsin each school district and charter school must designate an appropriate staff person to act as the Homeless Liaison. A list of those liaisons is listed at <https://dpi.wi.gov/homeless/liaisons>. CAC intake and case managers will coordinate and engage with the local homeless liaisons. It is also the responsibility of CAC to take the educational needs of children into account when families are placed in housing. CAC must do its best to place families with children as close as possible to their school of origin so as not to disrupt such children's education.

Involuntary Separation and Non-Discrimination:

When applying for housing CAC will not define the family status, that is within the rights of any client.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Per federal guidelines in the rule FR-5359, HUD programs have equal access to housing- regardless of sexual orientation or gender identity, family is defined as follows:

- a. Family: a group of persons residing together, and such group includes, but is not limited to:
 - i. A family with or without children (a child who is temporarily away from a home because of a placement in foster care is considered a member of the family)
 - ii. An elderly family
 - iii. A near- elderly family
 - iv. A disabled family
 - v. A displaced family
 - vi. The remaining member of a family

CAC does not require any documentation to show “proof” of family status, gender identification, and/or sexual orientation.

CAC has developed a grievance policy listed in this manual for any household who feel they have been involuntarily separated or feel they have experienced discrimination.

SECTION 6: HOUSING NAVIGATION PROCESS

Unit Eligibility- Standards:

Family Unit Size Standards

Community Action Coalition must establish subsidy standards to determine the number of bedrooms needed for families of different sizes and compositions. This section presents the policies and requirements that will be used to determine the family unit size that a particular family should receive, and that policies that govern making exceptions to those standards.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



For each family, CAC determines the appropriate number of bedrooms under HUD standards and enters the family size unit that is issued to the family. The family unit size does not dictate the size of the unit the family must actually lease, nor does it determine who within a household will share a bedroom/ sleeping room, it just sets a limit of the highest bedroom size a client may lease. The standards must be applied consistently for all families of like size and composition.

The following regulatory requirements apply when CAC determines family unit size:

- The unit must have at least one bedroom or living/sleeping room for every two persons.
- Children of opposite sex, other than very young children, may not be required to occupy the same bedroom.
- Any live-in aide must be counted in the family unit size.

CAC will assign one bedroom for every two persons within the household, except in the following circumstances:

- Single person households will be allocated a zero or one bedroom
- Persons of the opposite sex other than couples and children under age five will be allocated separate bedrooms
- Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aides family.

For current households on any program with CAC who are expecting children, the following protocols apply:

- If two children of the opposite sex that are both under the age of five share a bedroom, and the older child turns five, the family will be eligible for a larger bedroom voucher, at the next annual recertification following the other child's fifth birthday.
- A couple or a single pregnant woman is eligible for a one-bedroom voucher and will be eligible for a two-bedroom at the next annual recertification.

Housing Quality Standards (HQS Inspections and HUD Habitability Standard)

All COC housing units are inspected by an HQS- Certified Housing Inspector. ESG funded units are required to use a HUD habitability standard. The inspection must take place before the applicant moves into the unit and must meet HUD's Housing Quality Standards (HQS) prior to move-in. The Housing Inspector will complete a report at the time of the inspection. The



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Housing Inspection Worksheet is based upon HQS and includes: sanitary facilities, food preparation and refuse disposal, space and security, thermal environment, illumination and electricity, structure and materials, interior air quality, water supply, lead-based paint, access, site and neighborhood, sanitary condition, and smoke detector. Community Action Coalition must retain this documentation.

At the time of inspection, the utilities must be turned on so that they can be verified. The utilities do not need to be established under the client's name until the unit passes inspection.

If the Housing Navigator determines the unit does not meet HQS, the landlord will have the option to resolve the deficiencies within 10 business days. The Housing Inspector will provide the landlord with a written list of items to be repaired or improved. CAC will deny the Request for Unit Approval if:

- The landlord does not resolve the deficiencies within 10 business days
- The landlord chooses to not resolve the deficiencies
- The client chooses to not rent the unit

If the unit fails the HQS inspection, the client may continue the housing search.

Housing Search and Placement:

Community Action Coalition will issue each participating household a voucher that is valid for 30 days from the date it is issued. Clients must locate a suitable unit within the 30-day term. If an applicant does not locate a unit within the 30-day term, the applicant may request up to two additional 30-day extensions. Both extensions must be approved by the Program Director. On a case-by-case basis, additional time may be granted past 90 days.

Once an applicant locates a suitable unit, they will work with the landlord to complete the Tenant/Landlord packet. The packet must be turned in to CAC before the applicant's voucher expires.

The Tenant/Landlord Packet consists of:

- Inspection
- Lead Based Paint Checklist



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- Smoke Detector Form
- Lease and VAWA forms
- Rent Reasonable
- Fair Market Rent Certification
- Rental Assistance Agreement

The Housing Navigator will review the packet for completeness and accuracy. If a form is not complete, the Housing Navigator will contact the applicant and landlord.

The landlord must also complete the Landlord Packet which consists of:

- Important Landlord Facts Agreement
- Request for Taxpayer Identification Number and Certification for W-9 Form
- Direct Deposit Form
- Authorization for Alternate Payee and Preferred Method of Communication Form
- Owner/Landlord Information and Certification

Reasonable Rent Determination:

HUD will only provide assistance for a unit which the rent is reasonable. Community Action Coalition will determine whether a rent is reasonable by comparing the rent amount requested for the potential unit with that rent being charged for comparable, unassisted units. The comparison takes into account the location, size, type, quality, amenities, facilities, and the management and maintenance of each unit. The review also checks if the requested rent is in excess of rents currently being charged by the same owner for comparable unassisted units.

The Housing Navigator will complete the Rent Reasonable Process for all units. The Housing Navigator will three “very similar” units for the comparison. The units for comparison must include units that each have a high degree of similarity (>90%) and a high degree of credibility (>90%). Comparable units not meeting this criteria will not be used, unless the Housing Navigator can document why units meeting the criteria were not used (e.g. data is old or units are subsidized/rent controlled). If alternate units are used for comparison, units must meet the threshold of similarity or credibility of >90% while the other measure may not be below 80%.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



The average of the three adjusted comparable rents will be the ceiling amount for the potential unit. A Rent Reasonable unit will be certified, and a copy of the form will be included in the clients file on salesforce.

Fair Market Rent:

HUD establishes FMRs to determine payment standards or rent ceilings for HUD-funded programs that provide housing assistance. The FMR standard is applied to ensure that a reasonable supply of adequate but modest rental housing is accessible to program participants.

Client Rent Calculation:

Upon completion of the inspection and approval for the completed Tenant/Landlord packet, the Housing Locator will determine the tenant's portion of rent.

The client rent will be the highest of:

- 30 percent of monthly adjusted income
- 10 percent of monthly gross income; or
- If receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with actual housing costs, is specifically designated by such agency to meet housing costs, the portion of such payments which is so designated.

Leasing Process:

CAC has two leasing options:

1. The client is the lease holder. This is the most common form of option
2. CAC is the lease holder, and the client is the sublessor. This type of option is only for Permanent Supportive Housing Programs.

Clients must enter into an initial lease agreement of at least one year. This lease must be terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

Both the lease and contract must be executed and on file before any check may be issued to the landlord. Once the lease and paperwork have been completed and signed by all parties, and the



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



unit has passed HQS, the Housing Locator will have the file audited and then activated for payment. Rental assistance checks or direct deposits will be processed according to Community Action Coalition procedures.

Other Fees:

Please look at the attached policies and procedures for approved fees.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacscw.org



SECTION 7: CASE MANAGEMENT PROCESS

Enrollment and Orientation:

Once a client or family is approved by the landlord, an orientation meeting is scheduled to complete forms, provide information on the program(s) in which they are enrolling, discuss program expectations, and begin to compile documents for the client file (working and master) started by the caseworker assigned to the new client or family.

Forms include:

- Referral and Connection Plan
- Services Agreement
- Budget Outline
- Housing Stability Plan
- Rent Calculation
- Exit Planning
- Release of Information for other service providers

Services Participation:

HUD requires that supportive housing programs must provide supportive services for clients to enable them to live as independently as is practicable throughout the duration of their residence in the program. Verification of supportive services, including an annual re-assessment, for each client needs to be documented in HMIS, and all supporting documentation is kept in the client file.

CAC must commit to:

- Provide an identified case manager for each household
- Provide case management by meeting at least once every other week with their current clients
- Work with the client to develop an individualized case plan designed to promote long-term housing stability, increase skills and/or income, and increase self-determination.

Responsibility of Case Managers:



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



As a Continuum of Care recipient, Community Action Coalition is responsible for ensuring each client receives appropriate, quality case management.

CAC Caseworkers are required to enter all client data, including program activities and case notes, into Clarity and Salesforce. Salesforce is the agency-wide customer relationship management software used to collect and track this information. Additionally, CAC caseworkers must be licensed users of Clarity to use this database.

Upon taking a new client on, CAC caseworkers should immediately report in Clarity, and update any data as needed. Monthly Transactions are expected in Clarity, as well as yearly reviews.

CAC case workers should practice professionalism and use a trauma sensitive approach to case management. Trauma-sensitivity is the practice of using informed consent to ensure the client is well informed of their rights and clearly understands CAC processes. This means CAC staff must define and set clear and healthy boundaries which are respectful of the clients past traumatic experiences. Using a trauma-sensitive approach means staff approach clients with a “what happened to you” rather than a “what’s wrong with you” mindset.

Caseworkers should apply harm reduction practices with clients who are engaging in risky behaviors. Harm reduction means limiting the risky behavior, rather than abstinence. This can mean taking actions to not drive after using alcohol or other impairing drugs or substances, getting tested for communicable diseases, using clean needles, using condoms, talking to a health care provider about PrEP, or limiting the number sexual partners. Housing First allows clients to stabilize their basic human needs prior to taking on higher level health promotional behaviors. While CAC wants the best for our clients, we recognize that recovery is a complex and deeply personal journey.

If the level or scope of services does not meet these standards, CAC will enter an informal discussion with the case manager. If agreement on a solution cannot be reached, Community Action Coalition will work to obtain new case management for the client.

If a client is experiencing difficulties with their Case Manager, they may reach out to the Program Director at any time.

Individual Case Plan (ICP):

Clients receiving housing services require a Housing Stability Plan. CAC also offers case management to its clients in all housing first programs, which involves meeting with the client to develop an Individualized Case Plan (ICP). The purpose of an ICP is to address any challenges which might impair or inhibit the client from obtaining and maintaining stable housing. The ICP



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



must be collaborative, interactive and incorporate input from the client regarding case goals. While case management is not required, it is highly encouraged by CAC caseworkers. CAC caseworkers will work to engage clients and continue to offer services that might meet their needs.

In some instances, housing programs are the first point of contact for individuals with social, economic, and educational barriers, as well as personal difficulties such as substance abuse or mental and emotional challenges.

To complete an Individualized Case Plan:

- 1.) A Housing Stability Plan is first outlined and developed with the program client. This plan makes explicit measurable goals, steps to achieve goals, timeframes for completion of the plan, and clear responsibilities for all parties involved (client, case worker, other partners, etc.).
- 2.) The plan is written with input from the client and must be based on the assessment conducted during the orientation process and in subsequent appointments with the client.
- 3.) CAC caseworkers must ensure that the housing plan is signed by the client, by themselves and reviewed by a Program Director. Should a client refuse to sign the plan, the refusal must be documented and followed with another attempt to secure the signature at a later time.
- 4.) CAC caseworkers must ensure that the housing plan is updated at least monthly.
- 5.) All information must be documented in the Homeless Management Information System (HMIS), or Clarity. Materials such as signed housing plans must also be placed in the client file on salesforce.

The goal for the ICP is to move clients towards self-sufficiency. To attain self-sufficiency, ICPs establish initial goals and when those goals are achieved, new goals could be set. Goal sheets are available during the process to spark ideas during caseworker-client session. Office and home visits are required to maintain supportive rapport with clients.

It is important for CAC caseworkers to always maintain professional boundaries while clients pursue goals and objectives established in their ICPs. Annual reviews of case management plans are also required.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Healthcare Enrollment and Health Insurance Policy:

Case managers who are working with clients in CAC housing, while required to connect the client with all available services must ensure that they assist the client in obtaining and enrolling in healthcare. This may be state or federal benefits, Indian tribal insurance, Medicare, Medicaid, Marketplace insurance, etc. The case manager will assist the household in using their benefits, making appointments, choosing a healthcare provider, and arrange transportation if needed.

When a client enters a CAC housing program the Case Manager must document in HMIS what Health Care programs the client is currently enrolled in. Upon obtaining any Health Insurance the Case manager should update HMIS. Any improvement in the client's health, related to obtaining Health Insurance must be documented in Case Notes on HMIS.

The Wisconsin Department of Health Services has information on their website on programs, healthy living & prevention, childhood communicable diseases, choosing a healthcare provider and much more. The link to the website is:

<https://www.dhs.wisconsin.gov/forwardhealth/resources.htm>.

Program Exit/Discharge:

Prior to exit the CAC caseworker and client will have ongoing dialog about exiting the program.

Occasions in which a successful exit could occur:

- Client has met their case plan goals
- Client has asked to exit the program and no longer needs assistance
- Client is aware of and/or has been successfully referred to other services or housing

A client will be exited from a CAC program if any of the following occur:

- A client becomes ineligible
- A client violates program requirements and fails to meet a minimum correction action goals.
- A client formally requests to discontinue participation in the program.

If termination from a program does occur CAC is required to:

- Provide a statement with reason for termination



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- Include a copy of any program rules
- Written notice of final decisions if client asks for a review of the decision

If termination from a program does occur the client has the right to:

- Present written and oral objections
- enter the program again if they are/or become eligible

Abandonment:

If a client abandons a unit, a CAC caseworker should post an abandonment notice on the door of the unit and mail the same notice to the unit address. When a unit is empty for 30 days from month end, the caseworker may claim abandonment and exit the program in which they are enrolled.

Brief periods of stays in institutions not exceeding 90 days are not considered vacancies.

SECTION 8: CLIENT CHANGES, TRANSFERS, AND TERMINATIONS

Tenant Changes:



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Income

HUD regulations require that a client's portion of the rent be adjusted any time there is a change in income. CAC must examine a client's income initially, and at least annually thereafter, to determine the client's portion of rent. Clients are required to report any changes in income or other circumstances that may result in changes to the client's contribution toward the rental payment within 10 days. Adjustments to client's rental payment must be made as necessary. The adjusted rent will be effective 30 days beyond the end of the month that it was reported. Specific update requirements are laid out in the program Policies and Procedures that are attached.

Family Composition

Clients are required to notify CAC of any proposed changes in household composition. CAC is permitted but not required to add the program clients family member to the household after entrance into the program. The Program Director will review all request and notify the client in writing of the determination.

The following will apply.

- The unit must still meet all occupancy standards and HQS.
- A single parent may share a room with a small child.
- A living room may be used as a sleeping bedroom space, but not by more than two persons.
- The current landlord must approve the additional tenant.
- Income adjustments may need to be made.

Moving:

COC clients may move with continued assistance to another unit.

Restrictions on moves:

- Tenants are eligible to move if they have completed a full year on their lease.
- If the client wishes to break the lease within the first 12 months of subsequently thereafter, they must obtain permissions from their landlord and provide documentation that the landlord is canceling the lease without penalty, or provide documentation that the unit is unsafe/uninhabitable.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Moving Process

A client must contact their case manager to request approval to move. If the move is approved, the client will then give the landlord written 30-day notice of their move out date or longer notice if the lease requires it. The landlord must sign the 30-day notice to verify that the tenant is giving proper notice to vacate. The client must then submit a notice to vacate or nonrenewal notice to the case manager.

When a client locates a new unit, they again complete the Tenant and Landlord Packet and the landlord must complete the Landlord Packet. The packets will be processed and the lease-up managed in accordance with the policies and procedures set forth in Section 6 of this manual.

Emergency Transfer Plan:

In compliance with The Violence Against Women Act (VAWA), if a CAC program client is a victim of domestic violence, dating violence, sexual assault, or stalking and the client reasonably believes there is a thread of imminent harm of further violence, they may request an emergency transfer.

This request can be made if the domestic or dating violence, sexual assault or stalking incident occurred during a 90-day-calendar-day period preceding the date of request.

For each client who is moving to a different housing program due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking, CAC must retain the following:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking. This may be written observation of the housing or service provider, a letter or other documentation from a victim service group, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance: medical records: court records or law enforcement records: or written certification by the client to whom the violence occurred, or by the head of household.
- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault, or stalking, which would include threats from a third-



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement reports or records; communication records from the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program client to whom the violence occurred, or the head of household.

Within 24 hours of an emergency transfer, the following may occur:

- 1.) The program client will be moved to a new unit, if available.

If a new unit is unavailable at the time, the following will occur:

- 1.) The client will be relocated to a place deemed safe. This could be a home of a friend or family member or a domestic violence intervention service provider.

In Dane County:

Domestic Abuse Intervention Services located at 2102 Fordem Ave Madison, WI.
(608) 251-4445

For Jefferson and Waukesha counties:

The Women's Center located at 505 N. East Ave, Waukesha, WI (262) 542-3828
Pave Shelter Located in Beaver Dam, WI Crisis Line- (800) 775-3785 or Business Line
(920)887-3810

- 2.) While the client is in a safe location, the Housing Navigator will contact the Coordinated Entry System Manager to inquire about available units.
- 3.) If a unit cannot be located, other arrangements will be made for transitional or temporary housing.

In the case of an adult household of two individuals where the eligible client is asked to leave, the remaining client will have a period of 90 calendar days from the date of the eligible client's departure to establish eligibility for a CAC housing program or an external program. If the household member is ineligible, they will be referred to another CAC program to find alternative housing. An extension of up to 60 calendar days may be granted as needed for housing



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



navigation. Any denials of an extension will be documented and subject to CAC's Grievance and Appeals Policy. CAC will provide a written notice to the remaining household member of their rights.

CAC will make every effort to keep the individual requesting an emergency transfer in the program; however, there is no guarantee that continued assistance will be available. CAC will also exercise discretion when requesting documentation supporting the occurrence of domestic violence, dating violence, sexual assault or stalking for which the emergency transfer is requested.

Voluntary Termination of Housing Assistance:

The client may elect to leave a housing program at any time and may do so by informing their Case Manager, who will then inform their supervisor and the landlord. Clients who are currently receiving rental assistance must provide their landlord with a 30-day notice (or longer according to their lease) prior to vacating a unit.

If the tenant provides the required notice, CAC will pay the full rent up to the end of the 30-day period (if still eligible for the program), unless the landlord rents the unit to another tenant during that period.

Involuntary Termination of Housing Assistance:

CAC may terminate assistance to a client who violates program requirements or conditions of occupancy. CAC must exercise judgement and examine all extenuating circumstances in determining when violations are serious enough to warrant termination, so that a client's assistance is terminated only in the most severe cases. CAC is not prohibited from resuming assistance to a client whose assistance has been terminated.

Wherever possible, CAC will give clients written warning prior to termination so that they have an opportunity to take appropriate action to resolve the problems and thus continue their participation in the program.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Assistance may be terminated if the client violates program requirements or conditions of occupancy. Examples of program violations are:

1. Repeated complaints from the landlord due to violations of the lease agreement, such as disturbing the quiet enjoyment of the neighbors, allowing unauthorized persons to visit or live in the unit, property damage, unauthorized pets, repeated failure of HQS inspections, or non-payment of rent
2. Violent or hostile behavior that seriously threatens the health and safety of the community
3. Vacating the unit without notice for more than 30 consecutive days
4. Vacating the unit for more than 90 days while staying at an institution (e.g. hospital, jail, treatment facility)

CAC will not terminate a client's assistance simply because the landlord or service provider feels the client is "difficult", or for failure to participate in supportive services, failure to make progress on a service plan, a loss of income or improvement of income, or for being a victim of domestic violence.

Extremely serious program violations (including violent behavior, drug manufacturing, or other criminal behavior) will result in proceeding immediately to termination proceedings, if evidence is available.

Termination Process

Termination is a formal process that recognizes the rights of individuals receiving assistance to due process of law. The termination process is as follows:

Step 1: Informal Resolution

The Housing Navigator and/or the Case Manager will meet informally with the client to address the problem. Both the Program Director and the Case Manager should document in the client file these efforts to resolve the problem informally. In the case of serious criminal or violent acts, CAC may proceed to the termination procedures in *Step 5*.

Step 2: Written Warning

If the behavior cannot be corrected informally, the Housing Navigator will send the client written notice specifying the reasons their participation in the program may be in jeopardy, and that if the issues are not resolved, the next step may be to terminate their housing assistance. Copies of the letter will be sent to the Case Manager. If the client disagrees with the warning notice, they may request an informal conference with the Program Director to review the matter.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



If the client does not fulfill the terms of the written warning, the Housing Navigator shall either proceed with a termination, or postpone the termination for up to 30 days if the client has demonstrated a willingness to address the problems and has partially corrected the issue.

Step 3: Written Notice of Termination

If the matter proceeds to termination, the Housing Navigator shall notify the client in writing that they are being terminated from the program. The notice must contain a clear statement of the reason(s) for termination. All instances of fraud will lead to an immediate notice of termination.

The written notice of termination must also contain a statement that the client has a right to an informal hearing for a review of the decision, in which the client is given the opportunity to present written or oral objections and may be represented by a third party advocate. To request an Informal Hearing, the client must do so in writing within 10 days of the date of the termination letter. A client who fails to request an informal hearing waives this right, and the decision to terminate them from the program becomes final.

Once the client receives a Notice of Termination, CAC will send the landlord a 30-day Notice of Termination and will place a hold on the account effective the last day of the 30-day period. If the client requests a hearing within the allotted time period, CAC will remove the hold on the account and will pay for the unit for the month throughout the hearing process.

Step 4: Informal Hearing

If the client requests an informal hearing, the Hearing Committee must schedule an informal hearing within 10 working days of receipt of the request. The request for a hearing will be sent to the Executive Director. The informal hearing shall be a meeting between the client, the Housing Navigator and the Hearing Committee. Additional groups of people may also attend as deemed necessary by the client including legal representation, family supports, relevant witnesses or character references, and/or the partner agency Case Manager. The program client is given the opportunity to present written or oral objections.

The Hearing Committee shall issue prompt written notification of the decision to the client within 10 business days, including a clear statement of the reason(s) for the decision. The finding of the Hearing Committee is final and may not be further appealed.

Step 5: Termination

Once the decision to terminate the client from the program becomes final, the Housing Manager shall terminate the assistance by issuing a 30-day Notice to Terminate to the client and to the landlord, with a copy to the Case Manager. The Case Manager shall assist the landlord in obtaining the client's voluntary agreement to move out of the unit. If the tenant has not moved out at the end of the 30-day notice period, the landlord may evict the tenant through the legal eviction process.



Applicants who have previously been terminated by a CAC program may reapply for the program. An applicant's past history with the program will be taken into consideration in making an eligibility determination but will not be the sole determining factor for acceptance. Applicants will be placed through Coordinated Entry.

SECTION 9: OPERATIONS

Grievance and Appeals Policy

Any client of CAC programs has a right to file a grievance. Clients have the right to present and resolve complaints and grievances with the CAC. CAC staff adheres to the following Grievance and Appeals Policy:

A. Definition

CAC staff work to ensure that all clients are treated fairly and with respect. Clients may file a grievance when they feel they have been treated unfairly regarding procedure and/or that services requested were denied in violation of CAC procedures, applicable law, or conditions of the grant funding. These grievance procedures incorporate appropriate due process standards and provide for the prompt and equitable resolution of the grieved behavior.

B. Non-Recrimination

Staff shall not dissuade a program client from presenting the grievance, complaint or appeal nor should staff retaliate in response to the client having filed a grievance, complaint, or appeal.

C. Confidentiality

All forms and correspondence of the situation will be maintained in a confidential manner.

D. Grievance & Appeal Procedure

- 1.) Clients who feel they have not been treated fairly may discuss the situation immediately with the Program Director or submit a complaint on CAC's website.



- Information provided to the customer satisfaction survey will not be used to initiate a grievance. The client may communicate with the Program Director by telephone, email or mail. If the client wishes to file a grievance, it is the responsibility of the client to contact the Program Director or submit online. Non-Director staff is not engage in any further discussion on the matter with the client.
- 2.) Staff will notify the Program Director of the potential grievance within 24 hours, documenting the circumstances and providing any other pertinent information.
 - 3.) Once the client initiates a grievance, the Program Director will either discuss meet with the client to discuss the circumstances of the complaint. Meetings can take place via phone, in-person, zoom or teams. Notes of this conversation will be placed in the client's file. If there is no case file, the Program Director is to open an *ad hoc* file.
 - 4.) If the complaint is due to a staff member's behavior and is found to be factual, the Program Leader will discuss the matter with the staff member and take appropriate disciplinary action.
 - 5.) If the client is not satisfied with the conversation with or response from the Program Leader, the client will be referred to the Executive Director or the person that the Executive Director designates as responsible for handling grievances.
 - 6.) The Executive Director or designee will review all documentation of all the actions taken to-date and will make a final attempt to resolve the situation with the client as soon as possible.
 - 7.) If the client is still not satisfied, the only remaining internal recourse is to begin the formal appeal process.

E. Formal Appeal Process

The appeal process begins with the client securing a "Client Appeal Form" that is available upon request any CAC office. If the Executive Director or designee is unable to resolve the matter to the client's satisfaction, the Executive Director or designee should offer the Client Appeal Form to the client.

- 1.) The client needs to complete and sign the Client Appeal Form and submit it and any supporting documentation to the Executive Director or designee.
- 2.) If the client completes the form at a CAC office, staff needs to route the form and any attachments to the Executive Director or designee within two days.
- 3.) Within two business days of receiving the completed Client Appeal Form and any attachments, the Executive Director or designee is to contact the client to acknowledge receipt.
- 4.) Within 20 business days of receipt of the written appeal and complete information, the Executive Director or designee will form an Appeal Panel from among the



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- Board of Directors and schedule a meeting of the Panel for the presentation of the appeal.
- 5.) The Executive Director or designee will notify all Panel members and the client as to the date/time/place of the meeting. The client may bring any additional information or individuals to the meeting.
 - 6.) At the Appeal Meeting, the Appeal Panel will review the Client Appeal Form and any supporting documentation submitted with the Client Appeal Form. The Appeal Panel will review any documentation that staff has submitted to the Executive Director or designee. The Appeal Panel will permit the client or a representative of the client to make a statement if they so wish. The Appeal Panel may ask questions of the client or the client's representative, or of the Executive Director or designee. The Appeal Panel will deliberate and make a determination.
 - 7.) Within 30 business days of the meeting, a representative of the Appeal Panel will inform the client in writing of the determination made by the Appeal Panel.
 - 8.) The Appeal Panel will inform the full Board of Directors of the appeal and its determination at the next regularly scheduled meeting of the Board.
 - 9.) The Executive Director or designee will inform the Program Director if there are any programmatic or disciplinary actions to be taken.

The determination reached by the Appeals Panel is the final internal, Agency determination.

All appeal-related information is stored in a secure location and maintained by the Executive Director.

Reporting

All reporting requirements are explained in detail in the contracts and grants supporting CAC's program and services. Please see the attached Policies and Procedures for each program.

Recording Keeping

Client privacy, confidentiality, and information security is guaranteed by CAC program staff and external partners. Client information is "owned" by the client, and CAC acts as a steward of this



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



information. This is achieved by protecting this information from any use other than required for operation of the program. Client information is not shared with any other entities without prior permission (i.e., a signed Release of Information (ROI)). CAC staff adheres to its Confidentiality Policy as part of the Personnel Policy Manual in Appendix 11.

All records are retained in accordance with CAC's Record Retention Policy. An excerpt of this policy as it relates to Supportive Housing Programs follows:

All files are retained for 7 years.

During the orientation and intake process, any verification documents not used are shredded. Client files are stored in a secure location at each CAC office. CAC staff review files every year and safely dispose of expired files.

Confidentiality, Privacy, and Security

To maintain the utmost confidentiality, the disclosure by any employee of any information concerning a program client is prohibited except with the client's informed written consent or the consent of the client's legal guardian. Confidentiality may be breached when disclosure is necessary to prevent serious, foreseeable and imminent harm to a client or other identifiable person or when laws or regulations require disclosure without the client's consent.

- In all instances, CAC staff will disclose the least amount of confidential information necessary to achieve desired purpose. Only information that is directly relevant to the purpose for which disclosure is made will be revealed.
- CAC staff fully informs clients about the disclosure of confidential information and any possible consequences, before the disclosure is made. This applies whether information is disclosed based on legal requirement or client consent.
- CAC staff discusses with clients the nature of confidentiality, and limitations of clients' rights to confidentiality.
- CAC staff reviews with clients the circumstances where confidential information may be requested and where confidential information may be legally required. This discussion occurs as soon as possible in the staff-client relationship and as needed throughout the course of the relationship.
- No confidential information is disclosed to external parties unless clients have authorized such by signing a Release of Information (ROI) form.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacscw.org



- Clients sign a CAC and a Clarity Release of Information.
- Clients are informed that the Release of Information is effective until they notify CAC otherwise.
- If an inquiry is received about a program client who may be receiving services from CAC, CAC staff does not confirm or deny information about the client. The inquirer is asked to contact the person about whom they are inquired and obtain a signed Release of Information (ROI). Receipt of the release must be received by CAC prior to any disclosures made.
- CAC staff will not discuss confidential information in any setting unless privacy is ensured. Staff will not discuss confidential information in any public or semi-public areas including, but not limited to, hallways, waiting rooms, elevators, and restaurants.
- CAC staff protects the confidentiality of clients' written and electronic records, and other sensitive information. Staff takes reasonable steps to ensure clients' records are stored in a secure location and unavailable to those not authorized to their access.
- CAC staff takes precaution to ensure and maintain the confidentiality of information transmitted to other parties using computers, electronic mail, fax machines, telephones and voicemail, and other electronic or computer technology. Disclosure of identifying information is avoided whenever possible.
- CAC staff transfers or disposes of client records in a manner that protects clients' confidentiality and is consistent with state statutes and funding requirements.
- CAC staff does not disclose identifying information when discussing clients for teaching or training purposes, unless the client has consented in writing to the disclosure of this information.
- CAC staff will not discuss identifying information when discussing clients with external partners, unless the client has consented in writing to the disclosure of this information or there is a compelling need for disclosure.
- CAC staff protects the confidentiality of deceased clients consistent with the above standards.

During the orientation and intake process, a valid and current Release of Information (ROI) form is signed by the head of household for all program clients. The ROI shall be maintained in the client file. In cases where an ROI has not been obtained but the client has verbally consented to release of information, this authorization can be documented in the file. Information can then be released to the appropriate individual or organization for a period of up to three business days after



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



which a signed ROI must be obtained and stored in the client file.

Employee e-mails never include identifiable client information such as name, date of birth, and social security number. Emails referring to clients only use numeric client identifiers (i.e. the 5-digit client ID from Clarity or direct links to program activities). If there is not a unique client identifier, initials of a client can be used as an acceptable substitute. When communicating with an external entity that may be unfamiliar with client identifiers, the preferred method is direct verbal communication.

Reasonable care is exercised when communicating client information in discussions, face-to-face or by phone to ensure client privacy, confidentiality, and information security are preserved. No client information is discussed in-person, in voicemails or voicemail messages, or in e-mails with individuals and organizations if the client has not granted permission (i.e. ROI).

Computers and electronic devices such as tablets or smartphones used by CAC staff are password protected. Files with clients information are never stored on personal devices. Unencrypted 'flash' or 'thumb' drives are prohibited for storage of client data. Clarity and Salesforce are the only approved repositories for client information. Care is exercised to avoid creating and retaining intentional or unintentional copies of files, such as regularly purging downloaded files or using other methods of data clean-up.

Wisconsin Clarity Policies and Procedures

Wisconsin Clarity is administered through the state of Wisconsin and the Institute for Community Alliances (ICA). Clarity is the HMIS (Homeless Management Information System) used by all homeless service providers in the state of Wisconsin.

There is one CAC staff member who acts as the administrator for CAC. The administrator is responsible for updating provider information, creating new providers when programming is developed, and assisting users with passwords issues.

All Clarity users (i.e. CAC Caseworkers) must complete and agree to a Clarity User Agreement upon completion of required user trainings. All agency Clarity user agreements are electronic and kept on file with ICA. A Clarity Consumer Notice is published on CAC's website, and the consumer notice regarding Clarity participation is posted as appropriate in all CAC locations. The Clarity privacy policy is available upon request.

Pursuant with funding requirements, CAC program clients are required to complete and sign a



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



Release of Information for Clarity entry if the funding being used for program in which they enroll or intend to enroll inquires Clarity entry. As part of the release, clients are given options for preferences of information sharing. Based on signed client preferences in the WISP Release of Information, the applicable information is entered into Clarity by CAC staff. All data entered is completed in a timely manner (within five days of program entry) to remain compliant with contractual obligations. The signed Release of Information remains in the client file to ensure confidentiality.

Information regarding clients remains confidential and is only viewed for audit purposes, during program entry/exit, for reference, and for use in the correction of data entry errors. Reports are periodically generated by Program Director and by the administrator from the Advanced Reporting Tool (ART) module to identify any data entry errors. The ART module is also utilized to run monthly, quarterly and yearly reports for all grants that require Clarity entry. Currently, CAC strives for 100% data completeness; CAC minimum standards are 98% ICA minimum standard are 95%. ART reports are also used for data collection for required grant fund reporting, gathering information for each CoC groups (as needed), as well as collecting information for prospective grant opportunities.

CAC follows the current HMIS Policy & Procedure Manual which was developed by ICA.

Educational Needs of Families

Pursuant to CFR 578.23I(7), CAC considers the educational need of children when program clients (i.e. households with children) are entered into programs and services. This includes housing families and children as close as possible to their school of origin so as not to disrupt such children's education. CAC will work closely with the Dane and Balance of State COC's to develop policies and procedures which reflect their consideration.

Limited English Proficiency Policy Term

When possible, CAC will work to assign clients to staff who are fluent in their primary language. Client's children cannot serve as translators.

Any CAC program client who does not speak English as their primary language and who has a limited ability to read, write, or speak English will provide access to services. CAC currently offers this service through Certified Language International (CLI).

If a program client needs and interpreter, the following procedure applies:



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



- 1.) Dial 1-800-225-5254
- 2.) When the operators answers, tell them:
 - a. The customer code (27736)
 - b. Where you are calling from (name of program)
 - c. The language needed
 - d. The agency name and callers name
 - e. A third-party if dial-out is required
- 3.) The operator should connect the caller promptly.

For outbound calls:

- If an interpreter is needed for Limited English Proficient (LEP) at home or needs a third-party dial-out, please inform the CLI representative before the interpreter is connected.
- Once the interpreter is connected, the caller may tell the interpreters the LEP's name.
- At this time, the caller can also tell the interpreter how to proceed if the call goes to voicemail and what message to leave, if desired.

For inbound calls:

- Explain to the LEP that all information is confidential and encourage them to ask questions.
- Speak clearly
- If face-to-face and multiple people are in the room, speak one at a time.
- Speak freely: all CLI interpreters are sworn to confidentiality, neutrality, and the Interpreter Code of Professional Ethics.
- Encourage the interpreter to clarify terms, if necessary.

Language translation services are available to CAC caseworkers, staff, and clients. These are entered as program expenses, therefore CAC's procedures for completing and submitting Purchase Requests applies.

. Mandatory Reporting

1. **Mandatory Reporting of Child Abuse and Neglect:** CAC prioritizes safety and strives to provide a safe learning environment for everyone. Children come into contact with the CAC through various programs, and events.

a) **Definition:** "Abuse" of a child includes any of the following:

- i. Physical injury inflicted on a child by other than accidental means. "Physical injury" includes but is not limited to lacerations, fractured bones, burns, internal injuries, severe or frequent bruising or great bodily harm.
- ii. Sexual intercourse or sexual contact with a child under the age of 16 or with a 16- or 17-year-old child without his or her consent.
- iii. Sexual exploitation of a child. Sexual exploitation of a child occurs when a person employs, uses, persuades, induces, entices, or coerces any child to engage in sexually explicit conduct for



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



the purpose of recording or displaying the conduct or records or displays a child engaged in sexually explicit conduct. Sexual exploitation of a child also occurs when a person produces, performs in, profits from, promotes, imports into the state, reproduces, advertises, sells, distributes, or possesses with intent to sell or distribute, any recording of a child engaging in sexually explicit conduct.

- iv. Permitting, allowing or encouraging a child to violate the statute prohibiting prostitution.
 - v. Causing a child to view or listen to sexual activity for purposes of sexual arousal or sexual gratification.
 - vi. Exposing genitals or pubic area to a child or exposing a child's genitals or pubic area for purposes of sexual arousal or sexual gratification.
 - vii. Manufacturing methamphetamine with a child present, or in a child's home (including the premises of a child's home or in a motor vehicle located on the premises of a child's home), or under any other circumstances in which a reasonable person should have known that the manufacture would be seen, smelled, or heard by a child.
 - viii. Emotional damage for which the child's parent, guardian or legal custodian has neglected, refused or been unable for reasons other than poverty to obtain the necessary treatment or to take steps to ameliorate the symptoms.
- b) **Definition** "Emotional damage" is defined as harm to a child's psychological or intellectual functioning and is evidenced by one or more of the following characteristics exhibited to a severe degree: anxiety, depression, withdrawal; outward aggressive behavior; or a substantial and observable change in behavior, emotional response or cognition that is not within the normal range for the child's age and stage of development.
- c) **Definition:** "Child" is a person who is less than 18 years of age.
- d) **Definition:** "Neglect" is failure, refusal, or inability on the part of a caregiver, for reasons other than poverty, to provide necessary care, food, clothing, medical or dental care or shelter so as to seriously endanger the physical health of the child.
2. **Reporting Obligations.** Employees shall report any suspected abuse or neglect to the director supervisor as soon as reasonably possible. If the supervisor is not available, the report should be made to the Executive Director and/or Board President. The supervisor and Executive Director will determine if a report must be made personally or by telephone to the county department of social services or the county department of human services, or to law enforcement (county sheriff or the city, village, town, or university police department).
3. **Confidentiality.** Beyond appropriate disclosures, employees should treat the information as sensitive and confidential. Any documentation about an employee or volunteer report of child abuse or neglect will be stored and maintained in a secure file with the Executive Director.
4. **CAC's "No Violence Zone"** policy is an environment in which no adult shall hit a child, no adult shall hit another adult, no child shall hit an adult, and no child shall hit another child. The purpose of



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



the No Hit Zone is: 1) to create and reinforce an environment of comfort and safety for volunteers, families, and staff; and 2) to provide clear procedures for addressing situations in which adults are using physical discipline with children, or to de-escalate a situation in which caregivers/staff begin to raise their voices or show other signs of stress and inappropriate behaviors that occur prior to physical discipline.

- a) When violence is threatened or observed, it is everyone's responsibility to interrupt the behavior, if safe to do so, as well as to communicate the agency's policy to those present. Staff shall remove themselves from an unsafe situation. When staff observe dangerous or unsafe situation by directly confronting violent behavior. When violence/harm is a concern, staff will first remove themselves from the situation and appropriate authorities (mental health, child protective services, police, or peace officers) should be notified.

Amendments

Any significant grant or policy changes require written approval from the CAC Board, and grant funders.

SECTION 10: Volunteer Engagement

Volunteer Recruitment

Volunteers are recruited through a variety of mediums: online, word of mouth, and in-person or over-the-phone outreach, etc... The agency can post volunteer opportunities on the VolunteerYourTime.com website, and the CAC website.

Volunteer Screening and Placement



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



When a volunteer reaches out to CAC regarding an opportunity, CAC will take the following steps:

- A description of the volunteer opportunity is sent out for review for the person contacting CAC.
- A meeting is set up to answer any questions that the volunteer may have, and to ensure that the opportunity is one that they are interested in.
- The volunteer then fills out a Volunteer Application (please see attached), waiver, and background check.
- A background check form is then submitted to HR for screening and clearance.

Volunteer Orientation

After HR has cleared a volunteer, the volunteer then has an orientation date set up. At this orientation the appropriate CAC coordinator will then review the activities, answer any questions, and set a start date. After the start date a follow up weekly or monthly is helpful to make sure that the volunteer feels supported and engaged with CAC.

Volunteer Engagement and Retention

Regular contact is important with volunteers to ensure that they feel engaged and a part of CAC. Regular contact, at least monthly, along with a yearly volunteer event is an important part of retention. CAC should ensure that check ins are documented, and any concerns or questions are submitted to HR.

SECTION 11: HUD Resources

Code

42. U.S.C. Subchapter IV—Housing Assistance: United States Code Subchapter that codifies the homeless programs under Title IV of the McKinney-Vento Homeless Assistance Act, including the Continuum of Care Program.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



42 U.S.C. § 11381-11389: United State Code that authorized the Continuum of Care program (part formerly called Supportive Housing Program).

Regulations

24 C.F.R. Part 578: <https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578.5> Code of Federal Regulations that governs the Continuum of Care Program.

Subpart A—General Provisions: Purpose and scope, Definitions

Subpart C—Application and Grant Award Process: Eligible applicants, Overview of application and grant award process, Application process, Awarding funds, Executing grant agreements, Site control, Consolidated plan, Subsidy layering, Environmental review, Renewals, Appeal.

Subpart D—Program Components and Eligible Costs: Program components and uses of assistance, Continuum of Care planning activities, Unified Funding Agency costs, Acquisition, Rehabilitation, New construction, Leasing, Rental assistance, Supportive services, Operating costs, Homeless Management Information System, Project administrative costs, Relocation costs, Indirect costs.

Subpart F—Program Requirements: Matching requirements; General operations; Calculating occupancy charges and rent; Limitation on transitional housing; Term of commitment, repayment of grants, and prevention of undue benefits; Displacement, relocation, and acquisition; Timeliness standards; Limitation on use of funds; Limitation on use of grant funds to serve persons defined as homeless under other federal laws; Termination of assistance to program residents; Fair Housing and Equal Opportunity; Conflicts of interest; Program income; Applicability of other federal requirements

Subpart G—Grant Administration: Technical assistance, Recordkeeping requirements, Grant and project changes, Sanctions, Closeout

Rules

The Defining Homeless Final Rule <https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-30942.pdf> published in December 2011 established the definition of “homeless” and corresponding recordkeeping requirements used in HUD's Continuum of Care Program.

The Defining Chronically Homeless Final Rule, <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacsw.org



published in December 2015, established the definition of “chronically homeless” and necessary recordkeeping requirements used in HUD's Continuum of Care Program.



4101 East Towne Blvd. Madison, WI 53704
608-237-1255 | cacscw.org

