



**COMMUNITY
DEVELOPMENT GRANTS**
ADMINISTRATION

REQUEST FOR PROPOSAL
HOME American Rescue Plan
Non-Congregate Shelter (NCS) Development Program

NCS Application Deadline:
April 13, 2026 - 5:00 p.m. CST

Mario Higgins - Director
Community Development Grants Administration

200 E. Wells St., Room 606
Milwaukee, Wisconsin 53202
(414) 286-2276
cdgareports@milwaukee.gov

OFFICIAL NOTICE

January 12, 2026

The Community Development Grants Administration (CDGA) (the "City") is soliciting Requests for Funding Proposals to select qualified Development Teams and Homeless Services Providers to develop Non-Congregate Shelters through acquisition, rehabilitation, or new construction of units through this RFP.

The RFP can be found on the Community Development Grants Administration (CDGA) website at the following link:

<https://city.milwaukee.gov/CDGA>

An online informational webinar will be conducted on Monday, January 26, 2026, beginning at 10:00 a.m. CST.

The meeting may be viewed via Teams at:

[City of Milwaukee CDGA HOME-ARP NCS Informational Session](#)

Attendance is encouraged via Teams or by viewing the Teams recording.

(Additional information in the RFP document)

The recording will be posted at the following link: <https://city.milwaukee.gov/CDGA>

Questions regarding this RFP are due by **5:00 p.m. CST on January 23, 2026.**

Questions regarding this RFP should be addressed to:

Mario Higgins and Danielle Golida, in writing via email at:

mhiggins@milwaukee.gov

and

dgolida@milwaukee.gov

Initial qualification packages, in the form of the Preliminary Project Assessment (PPA), are due **February 23, 2026 at 5:00 p.m.**

***** VIA E-MAIL – CDGAreports@milwaukee.gov *****

(Additional information in the RFP document)

CDGA reserves the right to conduct interviews of the highest ranked Development Teams and Homeless Services Providers.

Should CDGA decide to proceed with interviews, development teams and homeless service providers must be available either

04/16/2026 or 04/20/2026

for interviews via videoconference.

- Cover Sheet.....2**
- Section 1: HOME-ARP Overview5**
 - A. HOME-ARP Background.....5
 - B. HOME-ARP Eligible Activities.....5
 - C. HOME-ARP Qualifying Populations.....5
 - D. HOME-ARP Referral Methods.....6
 - E. The City of Milwaukee HOME-ARP Allocation Plan.....6
- Section 2: RFP Overview and Allowable Project Types.....8**
 - A. RFP Overview and Allowable Project Types.....8
 - B. Eligible Activities.....8
 - C. Ineligible Activities.....9
 - D. Eligible Applicants.....9
 - E. Eligible Project Size.....9
 - F. Restricted Use Period.....10
 - G. Target Populations.....10
 - H. Eligible Referral Methods.....10
 - I. RFP Funding Source.....10
- Section 3: RFP Timeline and Application Procedures 12**
 - A. HOME-ARP Non-Congregate Shelter Timeline..... 12
 - B. Timing 12
 - C. Preliminary Project Assessment..... 12
 - D. Informational Webinar and Technical Assistance 13
 - E. Application Invitation and Submission 13
 - F. Application Upload Instructions 13
 - G. Application Submission Questions 13
 - H. Project Consideration and Intent 14
 - I. Fees..... 14
 - J. Application Outcomes 14
 - K. Application Evaluation and Notification..... 16
 - L. Funding Decision 17
- Section 4: Mandatory Application Criteria 18**
 - A. Application Certification 18
 - B. The CDGA’s Non-Congregate Shelter Application Invitation..... 18
 - C. Project Narrative and Shelter Operations and Service Plan Narrative..... 18
 - D. Neighborhood Assets Map..... 19
 - E. Site Control..... 19
 - F. Zoning 20
 - G. Environmental Site Assessment..... 21
 - H. New Construction Site Physical Information 21
 - I. Design, Construction and Regulatory Compliance Requirements 22
 - J. Historic Preservation Checklist..... 22
 - K. Needs Assessment Analysis 22
 - L. Site and Market Study..... 22
 - M. Financial Feasibility..... 23

| | |
|--|-----------|
| Section 5: Application Scoring Criteria | 29 |
| A. Leveraging Other Capital Funding Sources..... | 29 |
| B. Service Provider Experience..... | 30 |
| C. Shelter Operator Experience | 30 |
| D. Demonstrated Ability to Provide Positive Shelter Outcomes | 30 |
| E. Proven Need in Community | 31 |
| F. People with Lived Experience Included in Project Design | 31 |
| G. Services Offered..... | 32 |
| H. Food Prep or Kitchen Space Available to Residents..... | 33 |
| I. Access to Public Transit..... | 33 |
| Section 6: Post-Award Requirements..... | 34 |
| A. Approval of Final Plans and Specifications | 34 |
| B. Environmental Assessment..... | 34 |
| C. Excluded Parties..... | 34 |
| D. Labor Standards | 35 |
| E. Fair Housing | 35 |
| F. Section 3 and Minority- and Women-Owned Business Enterprises..... | 36 |
| G. Regulatory Period | 36 |
| H. Reporting and Monitoring..... | 36 |
| Appendix I: Definitions..... | 37 |

Section 1: HOME-ARP Overview

A. HOME-ARP Background

On March 11, 2021, President Biden signed into law the American Rescue Plan Act of 2021, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through the HOME Investment Partnerships Program (“HOME”) to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

Requirements for HOME-ARP funds are established via the **U.S. Department of Housing and Urban Development (“HUD”) Notice CPD 21-10: Requirements for the Use of Funds in the HOME-American Rescue Plan Program**. Applicants should review carefully and refer back to CPD-21-10 and other HUD HOME-ARP resources for detailed descriptions and definitions of the requirements around the HOME-ARP Program, in particular the definitions of eligible activities, Qualifying Populations (“QPs”), and referral methods, which are outlined below.

As the administrator the Community Development Grants Administration is responsible for the distribution of \$20,309,464 allocation of ARP (or “HOME-ARP”) funds through the City of Milwaukee. The allocation amount for Non-Congregate Shelter Housing, for this specific funding availability, is \$6,077,366.

The HOME-ARP Non-Congregate Shelter Acquisition and Rehabilitation Program (referred to as NCS throughout this document) is accepting funding submissions from eligible organizations to construct, rehabilitate, and/or acquire structures for the purposes of providing temporary shelter to individuals experiencing homelessness. This opportunity is to promote an expansion of homeless services in a non-congregate setting. Through a competitive funding round, the City of Milwaukee’s Community Development Grants Administration (CDGA) has funds available to fund projects. This is a COST REIMBURSEMENT GRANT. Funds must be spent within two (2) years of the effective grant date.

B. HOME-ARP Eligible Activities

HOME-ARP funds can be used for four eligible activities.

1. Development or preservation of affordable housing;
2. Tenant-based rental assistance (“TBRA”);
3. Supportive services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling; and
4. Acquisition and development of Non-Congregate Shelter. These structures can remain in use as Non- Congregate Shelter or can be converted to:
 - I. Permanent housing under the Continuum of Care (“CoC”); or
 - II. Affordable housing under the HOME Program.

C. HOME-ARP Qualifying Populations

HOME-ARP funds must be used to primarily benefit individuals or families from the following QPs:

1. “Homeless,” as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));

2. At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking,” as defined by the Secretary; and/or
4. Other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

Veterans and families that include a veteran family member that meet the criteria for one of the QPs described above are eligible to receive HOME-ARP assistance. Veterans and families that include a veteran family member that meet the criteria for one of the QPs described above are eligible to receive HOME-ARP assistance.

100% of HOME-ARP funds used by a PJ must benefit individuals and families that meet one of the QPs. Individuals and families in QPs may be assisted by one or more of the HOME-ARP eligible activities. Up to 30% of HOME-ARP rental housing units may be occupied by low-income households as defined in 24 CFR 92.2. For more detailed descriptions of each QP with statutory references, see HUD document [HOME-ARP Qualifying Populations \(QP\) At-A-Glance](#).

D. HOME-ARP Referral Methods

PJs are required to provide access to HOME-ARP projects and activities to all four HOME-ARP QPs through the referral method listed below and described in HUD Notice CPD 21-10. A referral identifies the next individual or household to receive assistance after an initial assessment process that determines the individual or household is an eligible QP. The selected referral method for HOME-ARP projects and activities is:

1. Use of HOME-ARP Expanded Coordinated Entry

E. The City of Milwaukee HOME-ARP Allocation Plan

State of Wisconsin and local PJs eligible to receive HOME-ARP grants were required to submit a HOME-ARP allocation plan to HUD for review and approval before funding could be released. The City of Milwaukee – Community Development Grants Administration, through the HOME Investment Partnership Program received an allocation to make significant, targeted investments in permanent supportive housing and assist persons experiencing homelessness, those at risk of homelessness, and those at greatest risk of housing instability.

Before developing its HOME-ARP Allocation Plan, the City of Milwaukee - Community Development Grants Administration conducted required outreach to local Continuum of Care, homeless service providers, and other agencies, providers, and groups working in areas that address the needs of the QPs to identify unmet needs and gaps in housing or service delivery systems. CDGA conducted statewide outreach to a wide range of entities to determine the varied and unique housing needs. This outreach included:

1. Local Continuum of Care
2. Housing and housing-related service providers
3. Public Housing Authorities
4. Fair housing, policy, non-profit and advocacy organizations
5. Regional economic development organizations
6. Various City of Milwaukee Departments

7. State agencies

CDGA received feedback from 43 different entities on needs and recommendations for HOME-ARP funding. Feedback from these entities and data generated from a needs assessment conducted for the Allocation Plan illustrated a great need for emergency shelter resources and affordable housing units across the state.

Section 2: RFP Overview and Allowable Project Types

A. RFP Overview and Common Terms

The purpose of this Request for Fund Proposal (“RFP”) is to solicit applications for the development of Non- Congregate Shelter through the federal HOME-ARP Program. HOME-ARP defines NCS as one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. The City of Milwaukee - Community Development Grants Administration seeks to expand the availability of quality emergency shelter space, the desperate need for which is outlined in the city’s HOME-ARP Allocation Plan, in order to better serve Milwaukee residents at the greatest need for emergency housing resources.

B. Eligible Activities

HOME-ARP funds may be used to acquire, rehabilitate, or newly construct HOME-ARP NCS units to serve QPs. Demolition of existing structures may be undertaken only as part of a HOME-ARP NCS Project.

For the purposes of this RFP, acquisition and/or rehabilitation of existing structures and the acquisition of vacant land for the purpose of new construction are permissible as allowable Project types.

HOME-ARP funds allocated under this RFP may be used for actual costs of acquiring or developing HOME-ARP NCS as follows:

1. Acquisition costs: costs to acquire improved or unimproved real property.
2. Development hard costs: costs identified in 24 CFR 92.206(a) to rehabilitate HOME-ARP NCS units, except costs must be for meeting the physical standards established in Section VI.E.7 of HUD Notice CPD 21-10.
3. Site improvements: such as costs to make improvements to the Project site, including installation of utilities or utility connections, and the construction or rehabilitation of laundry, community facilities, on-site management, or supportive service offices.
4. Related soft costs: reasonable and necessary costs incurred by the PJ and owner associated with the financing, acquisition, and development of HOME-ARP NCS Projects, including costs identified in 24 CFR 92.206(d) with the following **exceptions**:
 - i. Costs to provide information services such as affirmative marketing to prospective homeowners and tenants are not eligible;
 - ii. Costs of funding an initial operating deficit reserve are not eligible; and
 - iii. Costs to carry-out supportive services and operations of NCS
 - iv. Costs of Project-specific assistance to community housing development organizations, including technical assistance and site control loans or seed money loans as specified in 24 CFR 92.301; or
 - v. Any activities that result in the loss of current operational shelter beds of homeless QPs, are not eligible.

Replacement reserve: costs to capitalize a replacement reserve to pay the reasonable and necessary costs of replacing major systems and their components whose useful life will end during the Restricted Use Period. Major systems include structural support, roofing, cladding, and weatherproofing, plumbing, electrical and HVAC. The costs of replacing major systems must be determined through a Capital Needs Assessment or documented in writing after an inspection by the PJ or PJ-selected contractor to assess the remaining useful life of major systems expected upon completion of the HOME-ARP NCS Project.

C. Ineligible Activities

HOME-ARP funds may not be used to pay the operating costs of HOME-ARP NCS. Consequently, PJs must consider the availability of ongoing operating funds for the HOME-ARP NCS so that the Project can remain viable through the Restricted Use Period of 10 years.

Additionally, HOME-ARP funds **may not** be used to for the following purposes:

1. Paying costs of a conversion of HOME-ARP NCS to another use;
2. Providing non-Federal matching contributions required under any other Federal program;
3. Providing assistance for uses authorized under Section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (Public Housing Capital and Operating Funds);
4. Providing assistance to eligible low-income housing under 24 CFR part 248 (Prepayment of Low-Income Housing Mortgages);
5. Paying for the acquisition of property owned by the PJ, except for property acquired by the PJ with HOME- ARP NCS funds, or property acquired in anticipation of carrying out a HOME-ARP NCS Project;
6. Paying delinquent taxes, fees, or charges on properties to be assisted with HOME-ARP NCS funds;
or
7. Paying for any cost that is not eligible under HUD Notice CPD 21-10.

D. Eligible Applicants

Eligible applicants under this RFP must be a non-profit 501(c)3 social service organizations that currently serves one or more of the HOME-ARP QPs through emergency shelter, housing placement, case management, or similar activities with a minimum of three to five-year's experience providing such services. Be a developer who has or will establish partnerships with the Continuum of Care, Local Planning Body (LPB), local unit of government, homeless service provider or Tribal Community/Council to facilitate operations. Agree to HUD defined emergency shelter polices including [minimum habitability standards](#), provide CDGA a project timeline of all projects, and declare conversion plans of the Non-Congregate Shelter concluding the restricted use period. Management of additional funding sources will be considered eligible at the Community Development Grants Administration's sole discretion.

NCS project partners must additionally have a minimum of three to five years experiencing successfully developing and operating real estate, such as fixed-site shelters, single-room occupancies ("SROs"), permanent supportive housing, and/or affordable housing. Service provider project partners that do not have three to five years of real estate development experience must partner with an experienced affordable housing developer or technical assistance provider for the duration of HOME-ARP NCS development activities.

E. Eligible Project Size

HOME-ARP NCS Projects has no minimum or maximum allowable units. However, in accordance with the [Davis Bacon Act](#) all projects totaling (11) or more NCS HOME ARP units must comply with Federal Labor Standards of the jurisdiction in which the project will operate. Community Development Grants Administration **does require a minimum project size of 8 or more units**, but reserves the right to consider smaller projects upon request. Project proposals' unit count will be analyzed based on financial feasibility and proven community need. Project partners should consider their communities' needs and characteristics to ensure that a Project will be sized so as to provide a substantial impact on the needs of the area's QPs.

F. Restricted Use Period

HOME-ARP NCS Projects must comply with HOME-ARP requirements during the Restricted Use Period established in HUD Notice [CPD 21-10](#). For acquisition, rehabilitation, and new construction Projects, the Required Use Period is:

| Acquisition Only | Rehabilitation | New Construction |
|------------------|----------------|------------------|
| 10 years | 10 years | 15 years |

The NCS may remain as HOME-ARP NCS for the Restricted Use Period or may be converted. CDGA will not allow for conversion of the NCS units into permanent housing during the Restricted Use Period.

G. Target Populations

HOME-ARP NCS units may only be occupied by individuals or families that meet the criteria for one or more of the QPs – see **Section 2.C** of this RFP. The City of Milwaukee - Community Development Grants Administration HOME-ARP Allocation Plan does not include any preferences, methods of prioritization or limitations for NCS, and Projects must create a referral method plan that aligns with the Expanded Coordinated Entry referral process providing access to all QPs. HOME-ARP funds must address unmet needs in non-congregate shelter housing.

Access to HOME- ARP NCS units must be made to qualifying individuals without restrictions based on gender, age, or other factors, and no individual or family may be denied admission to or removed from a HOME-ARP NCS unit on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking if the individual or family meets the criteria of one of the QPs. HOME- ARP QPs are not subject to income restrictions. See HUD Notice CPD 21-10 Section IV: Qualifying Populations, Targeting and Preferences for further details on QPs.

H. Eligible Referral Method

CDGA has elected to not include preferences, methods of prioritization, or limitations for its HOME-ARP Non- Congregate Shelter activities. HOME-ARP funded Non-Congregate Shelters must admit all QP applicants for HOME-ARP Project or activities in chronological order of their application (without any preference or prioritization). Therefore, all NCS Projects funded under this RFP must use the following referral method:

1. Use of HOME-ARP Expanded Coordinated Entry

I. RFP Funding Source

Community Development Grants Administration (CDGA) HOME-ARP allocation will serve as the sole funding source of this RFP. No additional CDGA funding sources are eligible for HOME-ARP NCS Projects.

Under this RFP, no minimum or maximum of available HOME-ARP Non-Congregate Shelter (NCS) funding will be determined until final awards. Project costs at application may be requested, however CDGA encourages leveraging as NCS funding cannot be utilized as a single funding source under any project.

Community Development Grants Administration will evaluate the financial feasibility of each Project. The amount of funding to be awarded will not exceed the amount necessary to make the Project financially feasible, as determined by CDGA. CDGA may add or remove costs as deemed necessary to support the development and operation of the Project. Awards are in the form of reimbursable grants **only**. All funding awards, including the amount of the award, remain subject to the final approval of the City of Milwaukee Common Council.

Applicants should consult with an accountant to explore any potential tax consequences for an award of funds, and should be aware that HOME-ARP has its own set of rules and regulations and should become familiar with those rules and regulations.

Section 3: RFP Timeline and Application Procedures

A. HOME-ARP Non-Congregate Shelter Timeline

| Date | Action | Project Applicant Action Required |
|-------------------|--|-----------------------------------|
| January 12, 2026 | CDGA publish public notice NCS RFP | |
| January 12, 2026 | NCS RFP available on CDGA Website | |
| January 12, 2026 | NCS Preliminary Project Assessment (PPA) and attachments available on CDGA website | |
| January 26, 2026 | CDGA NCS Informational Webinar | YES |
| February 23, 2026 | Preliminary Project Proposal (PPA) due to CDGA (5:00PM CST) | YES |
| March 9, 2026 | Preliminary Project Proposal (PPA) review & clarification period concludes by CDGA | |
| March 23, 2026 | NCS Application invitations released | YES |
| March 30, 2026 | CDGA NCS Application Technical Assistance Webinar | YES |
| April 13, 2026 | *NCS Application Deadline (5:00 PM CST)* | YES |
| April 27, 2026 | NCS Application review period concludes | |
| May 2026 | Award Notifications | |

B. Timing

Preliminary Project Assessments (PPA) submitted for HOME-ARP funding requests under the Non-Congregate Shelter will be accepted between January 26th thru February 23, 2026. Applicants will receive a determination of their initial Project feasibility by March 23, 2026. Invitation for submission of an application does not guarantee funding. For all projects financed by HOME- ARP, approved funds should complement other sources of financing to close funding gaps.

C. Preliminary Project Assessment (PPA)

When applying for CDGA NCS resources, the first required step for all Projects is completing a Preliminary Project Assessment or (PPA). All projects seeking funding under this RFP must complete the PPA process before submitting an application. Required PPA documentation includes information related to project concept, location, financing, assumptions, and development team. PPAs will be evaluated by proposed Project: concept, site, area need/demand, financial feasibility, and partners outlined in **Section 3. J** below. All PPA materials can be found at City of Milwaukee Community Development Grants Administration website, under NCS PPAs, at [City of Milwaukee CDGA](#).

Possible Preliminary Project Assessment (PPA) Non-Congregate Shelter Evaluation Outcomes

| PPA Evaluation Outcome | PPA Category | Overall PPA Outcomes |
|-----------------------------|--|--|
| Approval | The PPA category is approved, criteria are satisfied | The PPA is approved, and full NCS application is accepted by CDGA |
| Conditional Approval | The PPA category is conditionally approved, as project criteria is not fully satisfied and subject to conditions | The PPA is approved subject to conditions being met within any of the categories set forth by CDGA |
| Denial | The PPA category is denied, as project criteria is not satisfied | The PPA is denied, and the NCS application will not be accepted by CDGA |

D. Informational Webinar and Technical Assistance

An informational webinar will be held January 26, 2026 accessed through the city's Community Development Grants Administration (CDGA) website from 10:00 a.m. to 11:30 a.m. CST, recorded and accessible via the CDGA webpage upon its conclusion, to educate and engage potential Non-Congregate Shelter (NCS) applicants by presenting the purpose, intended outcome, and compliance of the City of Milwaukee HOME-ARP NCS Program.

Technical assistance (TA) will be provided to Non-Congregate Shelter applicants March 30, 2026, five business days after NCS application invitations are released. NCS applicants can access the technical assistance webinar through CDGA's website from 10:00 a.m. to 11:30 a.m. CST. Technical assistance discussions may include proposed projects: financial details, location, intended QPs, and site surrounding community supports for QPs served.

E. Application Invitation and Submission

Only approved or conditionally approved PPAs will be formally invited to complete the CDGA HOME-ARP NCS application. Applications are submitted electronically through CDGAreports@milwaukee.gov. All project proposals received after the closing date **Section 3.A** will not be reviewed. CDGA application documentation will not be accepted in paper form.

F. Application Upload Instructions

1. All document submissions must be in PDF format.
2. Once all application materials are complete, click submit.
3. After submitting, check the submitted email for one reply email; this will direct the recipient to a link to upload attachments.
4. Each file uploaded must clarify the project name and document type: (*Ex: PPA Form, Project Schedule, or aerial photos*).
5. Submitted applications cannot be edited once submitted to CDGA.
6. Incomplete submissions will not be reviewed.

G. PPA and Application Submission Questions

To CDGAreports@milwaukee.gov with the **subject line** "HOME-ARP NCS Questions."

H. Project Considerations and Intent

Applications submitted under this HOME-ARP Non-Congregate Shelter RFP must clearly indicate project concept, location, financing, assumptions, development team, specific or all QPs to be served, and intent to convert HOME-ARP NCS concluding the Restricted Use Period.

I. Fees

Community Development Grants Administration will not collect a fee for submission of the PPA or application in correspondence with this RFP.

J. Application Outcomes

Community Development Grants Administration will evaluate Non-Congregate Shelter proposed projects by the following criteria:

1. Project Concept
2. Site
3. Financial Feasibility
4. Development Team

Application requirements and evaluation criteria for each of these categories will be determined as described in the sub-sections below. Applicants must submit documentation to satisfy each category's criteria at time of submission.

Applications will receive an evaluation in each category below, resulting in an overall evaluation determination from CDGA. There are two possible outcomes for all application evaluation categories which are content and completeness.

Application content areas are:

- Leveraging Other Capital Funding Sources
- Service Provider Experience
- Shelter Operations Experience
- Demonstrated Ability to Provide Positive Shelter Outcomes
- Proven Community Need
- Project Design Includes Persons with Lived Experience
- Support Services Offered
- Kitchen Space Availability
- Access to Public Transportation

Application completeness areas are:

- Application received by the designated deadline
- Application includes all requested project documentation
- Application form and supporting documentation are complete; and
- All necessary documents contain all appropriate signatures

If CDGA finds that the Application is not complete it reserves the right to reject the Application and notify the Applicant with stated reason(s) for denial.

| Non-Congregate Shelter Application Final Outcomes | |
|---|--|
| Application Evaluation Factors | Application Outcomes |
| Approval | The application category is approved, all criteria are satisfied and <u>will be</u> accepted by CDGA. |
| Denial | The application is denied criteria is not satisfied and <u>will not</u> be accepted by the CDGA. |

1. Project Concept Criteria

Applications will be reviewed and evaluated for a Project’s general concept including: intended population served, Project size, shelter operations and service plan details, and proposed partnerships, if any.

All application submissions should include detailed responses to clarify the Project’s overall approach to shelter and alignment with best practices of the City of Milwaukee policy priorities for housing vulnerable populations. Responses and all relevant details must be included and CDGA will evaluate the Project concept on the following criteria:

- a. Project size and type
 - i. The proposed number of units.
- b. Target populations
 - i. A description of the intended population(s) to be served by the project, and;
 - ii. A listing of the specific QP(s) to be served by the Project (see **Section 1.C and Section 2.G**).
- c. Housing referral coordination
 - i. A description of the Project’s proposed approach to housing referral coordination;
 - ii. Indicate how the eligible referral method will be used to serve the Project’s QP(s) (see **Section 1.D and 2.H**).
- d. Preliminary shelter operations and service plan details
 - i. A description of the Project’s proposed approach to providing equitable access to the shelter and homeless services, including:
 - 1. How the Project will connect with the local homeless services/crisis response system, particularly with the area CoC;
 - 2. An outline of the services that will be offered to residents, the number of proposed service staff, how service provision will be funded, and how services will be provided and by what organization(s);
 - 3. Confirmation that no occupancy fees will be charged to shelter occupants as described in [Section VI.E.1. of HUD Notice CPD-21-10](#);
 - 4. How the intended policies and procedures of the proposed shelter align with Housing First principles and best practices, including:
 - a. Low-barrier approach to shelter admission;
 - b. Shelter diversion;

- c. Service participation is voluntary and not a requirement for admission or to remain in the shelter;
- d. Availability of housing navigation connected to the shelter.

Projects may include draft versions of service plans, agreements or MOUs, or other relevant documentation to support the Project concept.

2. Site Criteria

Applications will be reviewed and evaluated based on the location and fit of their Project Site(s) within the City of Milwaukee, and will include an evaluation of existing emergency shelter characteristics.

3. Project Financial Feasibility Criteria

Key capacity and financial aspects of the Applicant and Project will be reviewed at time of submission. This review is a part of the Project Financial Feasibility category, which will be used to determine that the Applicant has sufficient capacity to develop, own, and manage the Project and that there are sufficient funds to cover all costs during construction and the Restricted Use Period. This review will include an analysis of the Applicant's net worth, portfolio risk, litigation, pending judgments and bankruptcies, pre-development funding, and liquidity and administrative capacity.

a. Capital and Operating Budget Analysis

- i. As a part of application submission, Applicants must complete the budget section. Applicants must substantiate the capital and operating budgets, providing a list of all funding sources both under consideration and approved. Applicants must also explain how these sources contribute to the Project's financial viability. All funding sources must be listed within the application. Applicants must indicate the current status of each funding source (i.e., under consideration or approved).

b. Applicant-Related Financial Documents

- i. Applicants will be evaluated on their organization(s)' demonstrated financial approach towards providing services and the proposed Project. Applicants must also provide financial documentation to meet the minimum requirements of the Project.

4. Development Team Criteria

Proposed Project participants will undergo screening for congruence with CDGA requirements for development team experience. Applicants will be evaluated with development experience such as a general contractor history, property management of emergency and affordable housing types, along with new construction.

If an Applicant does not meet stated ownership experience CDGA may, at its sole discretion, accept alternative evidence of the development team's appropriateness. Applicants are encouraged to be in contact with the CDGA prior to submittal of application regarding potential exceptions to the experience requirements for any of the QPs.

K. Application Evaluation and Notification

CDGA will electronically issue the final evaluation and notification letter directly to the Applicant with the review outcome for the PPA and NCS Application. The final application evaluation notification letter will contain an outcome for each of the five categories, as well as an overall outcome. The final evaluation and notification letter will not contain any Conditional Approvals, as this process is limited to the Preliminary Project Assessment (PPA), and potential penalties associated with non-compliance.

Overall, final application outcomes for Projects seeking HOME-ARP funds through the Non-Congregate

Shelter RFP are valid through the closing date of this RFP and will only be considered valid in conjunction with an Application under this Non- Congregate Shelter RFP. Please note the NCS Application process will be conducted in phases to ensure viable projects are received.

L. Funding Decision

Funding recommendations by CDGA are advisory to the City of Milwaukee Common Council. Applicants that are not recommended for funding will be formally notified within 30 days of Common Council action.

Applicants who are funded, additional documentation will be required prior to executing a contract between the City and the respective organization.

Successful applicants must be able to obtain insurance consistent with the City of Milwaukee Community Development Grants Administration policy.

Section 4: Mandatory Application Criteria

HOME-ARP Non-Congregate Shelter Development Program and construction of Non-Congregate Shelter units that corresponds with the outline must be preliminary approved to proceed with the application. All application materials will be available by invitation only. Application invitations will be conducted in rounds, with each round lasting 30-90 days, consistent with a rolling application process. CDGA does not have an official closing date for NCS proposed projects. Rounds of application invitations will be extended to successful Preliminary Project Assessments. Application invitations will end once selected and awarded projects have exhausted available funding.

Only Projects that demonstrate readiness to proceed with financing and development will be considered, as evidenced by meeting mandatory application criteria described in this section. CDGA reserves the right to rescind any award of funds that is unable to close within six months from the date of award.

A. Application Certification

All Applications must include a signed **Non-Congregate Shelter Development Program Application**, found on the CDGA website, which provides a written certification that the Project will:

1. Take actions to affirmatively further fair housing; and
2. Minimize involuntary displacement of low-income households;

B. CDGA Non-Congregate Shelter Application Invitation

All Applications must include a completed **Non-Congregate Shelter Application**. This form will be made available to successful Preliminary Project Assessment (PPAs) teams, through CDGA, once approved.

C. Project Narrative and Shelter Operations and Service Plan Narrative

1. Project Narrative

All Applications must include narrative that provides a complete overview of Project scope, building and unit features, population served and overview of project financing, including terms of non-CDGA sources. Applicants should provide as much detail and background information about the Project as possible.

2. Shelter Operations and Service Plan Narrative

Projects must also provide a shelter operations and service plan narrative describing their approach to providing equitable access to the shelter and homeless services. At a minimum, Projects must:

- i. Describe how the Project will connect with the local homeless services/crisis response system, particularly with the area CoC;
- ii. Outline the services that will be offered to residents, the number of proposed service staff, how service provision will be funded, and how services will be provided and by what organization(s);
- iii. Confirm that no occupancy fees will be charged to shelter occupants as described in Section VI.E.1. of HUD Notice CPD-21-10;
- iv. Describe how the intended policies and procedures of the proposed shelter align with shelter best practices in providing housing including:
 - Low-barrier approach to shelter admission;
 - Shelter diversion;
 - Service participation is voluntary and not a requirement for admission to remain in the NCS;
 - Availability of housing navigation connected to the shelter

All Applicants must provide one or more Memorandums of Understanding (“MOUs”) or other legal agreements with organization(s) regarding the availability of services that are referenced in the Application.

Projects that confirm the ability to provide certain support services may be eligible to receive points under the scoring criteria outlined in **Section 5.G**.

D. Neighborhood Assets Map

All Applications must include a neighborhood assets map that clearly delineates the location of the Project along with neighborhood assets.

The Application must include referencing to each neighborhood asset identified and stating the asset category and address. Only one establishment may will be considered per category. The following table lists the eligible neighborhood asset categories:

| Neighborhood Assets Categories |
|---------------------------------|
| Food (grocery access) |
| Access to Public Transportation |
| Health Services |
| Civic/Recreation |
| Education/Job Training |

CDGA reserves the right to mandatorily fail Project Applications that include fewer than two neighborhood assets. For Projects that are unable to demonstrate that at least two neighborhood assets are included within the proximity radius for the applicable, a narrative may be provided indicating how access to Food, Access to Public Transportation, Health Services, Civic/Recreation, and Education/Job Training will be made available to residents of the development. CDGA, at its sole discretion, will determine whether any narrative will be sufficient to meet this mandatory criterion.

E. Site Control

All Project Sites must be identified in the Application. Projects consisting of multiple Sites must satisfy site control requirements for all Sites. For acquisition Projects and Site Control, the site **must be** vacant or **unoccupied** by any tenants or residents.

The Application must include all of the following:

1. A map showing the location(s) of the Site(s). If site control is for a property larger than the Site(s), the Site(s) must be delineated on the map;
2. Aerial photograph(s) of the Site(s) with the boundaries of the Site(s) clearly delineated, and surrounding uses clearly visible; and
3. Evidence of Site control, which can only be demonstrated with Site control documentation for each Site that prohibits preemptive termination language and consists of one of the following:
 - i. A fee simple interest in the Site in the name of the Applicant or Owner; or
 - ii. A fully executed, binding agreement with a term ending no sooner than six months after the Application deadline, signed by both the Applicant or Owner and the seller for the purchase

of the Site; or

- iii. A fully executed, binding agreement with a term ending no sooner than six months after the Application deadline, signed by both the Applicant or Owner and the seller for the long-term lease of the Site with a lease term satisfying the Restricted Use Period of the Project or
- iv. A fully executed, binding agreement with a term ending no sooner than six months after the Application deadline, signed by both the Applicant or Owner and the seller of the Site evidencing land and/or building donation; or
- v. When the Site is owned by a governmental entity, a letter of intent to the Applicant or Owner from the governmental entity to sell, donate, or enter into a long-term lease of the Site with a term ending no sooner than six months after the Application deadline.

Site control documentation must include the following clearly marked and highlighted:

1. Expiration date for purchase option(s), purchase agreement(s), or letter(s) of intent;
2. Legal description of the site(s);
3. The sale or lease price of the Site(s), which must align with acquisition costs in the Project budget in the Non-Congregate Shelter Application and for the Project may only include the acquisition costs attributable to the Site. If site control documentation is for property larger than the Site, a detailed narrative and calculation of the Site sale or lease price on a per square footage basis must be submitted; and
4. Language that complies with the environmental review and voluntary acquisition guideline as well as language outlined in the Site Control Compliance Language OR a copy of this language that contains a dated, counter signature from the seller.
 - i. Applicant or Third-Party Related Entity Purchase and Subsequent Conveyance. If the Applicant or related third-party entity will purchase the Site(s), and subsequently convey it to the Project Owner, the following information must be provided:
 - a. A narrative outlining the expected sale or lease price;
 - b. The proposed dates of conveyance; and
 - c. The reason for the conveyance.

The seller cannot terminate the agreement prior to the mandatory six-month term. If language is not included in the Site control documentation, evidence of compliance with this section can only be demonstrated by submitting a copy of language notification receipt by seller (e.g., certified mail, return receipt requested) and the date of delivery with countersignature by seller. Without language regarding compliance with environmental review and voluntary acquisition, Applicants may be precluded from applying to CDGA for federal resources.

F. Zoning

The Application must include evidence that all Sites are either currently zoned for the proposed use or will be addressed through the Board of Zoning Appeals (BOZA) process in a timeframe compatible with the project's two-year Placed In-Service date.

1. Zoned Project Sites

Evidence that Sites are currently zoned for the proposed use can only be demonstrated through:

- i. A valid building permit; or
- ii. A letter from Board of Zoning Appeals identifying the Project and containing all of the following:

- a. The location of the site(s) (i.e., address or street crossing);
 - b. The current zoning and any special use designations;
 - c. A description of the Project (including numbers of units, and proposed use; and
 - d. A statement that the current zoning will permit the proposed Project
2. Sites with Pending Re-Zoning, Variance, or Special Use Applications
- CDGA recognizes that a Site may need a re-zoning, a variance to existing zoning, or a special use permit. In these circumstances, the Application must include the Board of Zoning Appeals certification identifying the Project's following information:
- i. The location of the Site(s) (i.e., address or street crossings);
 - ii. A description of the Project (including number of units, and proposed use);
 - iii. A written explanation of the re-zoning, variance, or special use permit approval process;
 - iv. Evidence the re-zoning, variance, or special use permit process has been initiated;
 - v. Evidence of which stage in the re-zoning, variance, or special use permit approval process the Project has reached; and
 - vi. Evidence that the re-zoning, variance, or special use permitting will be reviewed in a timely manner, including any available dates.

G. Environmental Site Assessment

The Application must include a Phase I Environmental Site Assessment ("Phase I") covering all Sites. The Phase I must be completed within one year prior to the Application deadline. As part of HUD's HOME ARP funding, CDGA as the responsible entity, will complete a Part 58 Environmental Review. Applicants may review [HUD's Part 58 Environmental Review Checklist for HOME-ARP Projects](#) as an additional resource.

H. New Construction Site Physical Information

The Application must include a project scope certification signed by a licensed architect acting as the Project's architect of record. The certification provides written confirmation of accessibility codes and Fair Housing Act requirements (if any) applicable to the Project. The certification also provides written confirmation and identification of specific Project features which meet minimum code requirements.

Preliminary plans of projects must include preliminary drawing and specifications that include all of the following:

1. Project title, development team, drawing index, building areas and code information; and
2. Dimensioned floor plans, including square footage, for all unit and building types, with room designations and proposed finishes;
3. Color rendering;
4. Typical wall selections;
5. Exterior elevations for all building types with material notations matching those defined within the scoping document discussed below;
6. A Site plan showing the placement and orientation of buildings, parking areas, sidewalks, easements, setbacks, trash dumpsters, buffers, storm water detention, required site amenities, and significant natural features; and

7. Preliminary landscape plan
8. Project Scope Certification, signed by the Architect and Applicant. The Project scope certification must include a written description of the full Project scope. Items to be included, but not limited to, in this document are:
 - a. Specifications indicating all materials selected and/or defined performance criteria (e.g., windows, doors, hardware, drywall, exterior materials, floor and wall finishes);
 - b. Definition of structural systems to be modified/installed as part of the Project;
 - c. Programmatic description of the proposed furniture, fixtures, and equipment items;
 - d. Definition of the Project's sustainability strategy in the form of a certification checklist, energy model or detailed description of elements provided and their expected impact consistent with the level of points requested in the Application;
 - e. Written description of HVAC system to be installed; and
 - f. Definition of any/all other unique items included in the Project.

All Projects involving any Rehabilitation of existing structures must comply with the following requirements by highlighting, at minimum, the proposed rehabilitation work identified as "Critical" or "Immediate" on the existing conditions of the property. Items identified as five- to seven-year needs in current rehabilitation work may be completed as part of the current construction scope of work, or adequate reserves may be budgeted to ensure these items will be completed within timeframes identified. CDGA reserves the right to modify the construction scope based on a review the explanation.

I. Historic Preservation Checklist

All Projects must meet the requirements of the National Historic Preservation Act. The Application must include the [State of Wisconsin Historical Preservation Checklist](#) for all Projects inclusive of all sites and multisite Projects. CDGA must submit a review request to Wisconsin Department of Natural Resources ("WDNR") after the CDGA receives the checklist. There is a mandatory 30-day review period required for obtaining an approval letter from WDNR.

J. Construction Cost Breakdown

The Application must include:

1. The Construction Cost Breakdown forms completed by a qualified contractor, Architect of Record, or construction cost consultant. Construction Cost Breakdown form is located in the Non-Congregate Shelter Common Application, available on the website.
2. A detailed explanation of all construction cost variances existing between the Construction Cost Breakdown and PNA, if applicable. The Construction Cost Breakdown will be evaluated along with the PNA to ensure that all necessary items are addressed. If the scope of work is deemed insufficient by CDGA, the Application may fail to meet the mandatory criteria.

K. Needs Assessment Analysis

Applications must produce a **NCS Need Assessment Analysis** for new construction NCS Projects at the time of Application to be submitted to CDGA.

L. Development Team Capacity

CDGA will evaluate the Development Team's capacity to successfully complete and manage the Project.

Applications must include the following for CDGA to evaluate the experience and capacity of the development team:

1. Development Team Required Experience

The Application must include verifiable experience for each Project Applicant, general contractor, architect, property manager, and service provider (if applicable) inclusive of all pending, under construction, or completed Projects in any state, including their present status and expected completion date. CDGA will exercise its discretion when accepting alternative verification of acceptable experience.

Development team members must demonstrate a history of similar work and type as required for the proposed Project. Applicants should discuss potential exceptions to experience requirements with CDGA as part of the PPA process. CDGA will request additional information as necessary to approve Project partners before full application.

2. Unacceptable Practices

CDGA may deny any Project in which any participant in the Development Team has failed to demonstrate ongoing proficiency with affordable and supportive housing programs. The applicant may include in the application an explanation of the circumstance surrounding the unacceptable practice and the roles of each of the Participants.

Examples of unacceptable practices include but are not limited to:

1. A Participant is affiliated with existing Projects which have been cited for material and/or continuing, but curable, noncompliance. Material noncompliance exists when a party exhibits a continual pattern of noncompliance, or when a party demonstrates an inability or an unwillingness to resolve noncompliance in a timely manner.
2. A Participant (including any affiliates) has experienced any events of foreclosure or failed to perform under the terms of a workout agreement over the past three years.
3. A Participant (including any affiliates) has declared bankruptcy over the past three years.
4. A Participant (including any affiliates) has a mortgage default or arrearage of three months or more within the last three years.
5. A Participant that has failed to pay any fee or expense due to CDGA, including outstanding compliance monitoring fees.
6. Any liens, judgements, or other claims exist against property owned by Owner (including any affiliates) for which the Owner has failed to resolve a public filing.
7. The Owner (including any affiliates) has been debarred or received a limited denial of participation in the past three years by any federal or state agency from participating in any development program.
8. A Participant that has materially misrepresented facts on any request for CDGA resources

M. Financial Feasibility

All Applications must demonstrate that the Project is financially feasible. The following is a description of the areas, along with expected limits, which will be evaluated in order to determine financial feasibility.

CDGA will evaluate the Project's financial feasibility and underwriting assumptions. To demonstrate financial feasibility, Projects must be consistent with requirements detailed in this section of the RFP. Compliance with the CDGA's financial feasibility standards will be substantiated by submission of the Non-Congregate Shelter Common Application form and due diligence items specified within this RFP.

1. Sources

a. Maximum Request

Under this RFP Project costs may be requested per Project; however, the amount of HOME-ARP funding to be allocated will not exceed the amount necessary to make the Project financially feasible, as determined by CDGA

b. Evidence of Project Financing

All Applications must reflect adequate sources of financing to complete the Project. Any Application that does not reflect adequate sources will fail the mandatory criteria.

All Applications must evidence all Project financing sources including debt and grants through executed acknowledgment letter(s) from all lender(s) and/or grantor(s). Each acknowledgment letter must contain evidence that, as of the Application deadline date, the Application is either still under consideration or has been approved.

If during CDGA'S review of the Application, in conjunction with the PPA already submitted, the Applicant is notified that another Project financing source has been denied, the Applicant will be allowed 14 business days from the date of the denial notice to provide a revised financing plan. If not provided, CDGA may determine, at its sole discretion, that the Project is financially infeasible and may fail the mandatory criteria.

All Applications must demonstrate that Project underwriting is in compliance with the requirements associated with all Project financing sources.

c. Non-CDGA Debt Sources

For any debt source, the executed acknowledgment letter(s) must contain the following terms:

1. The entity providing the loan;
2. The amount of the loan;
3. The length of the loan term;
4. The amortization period of the loan;
5. The estimated interest rate (and any terms and conditions regarding adjustments);
6. The expected monthly or annual debt service payment; and
7. Any financing fees associated with the debt source;
8. If debt financing is to be obtained through a mortgage broker or banker, the executed acknowledgment letter must be from the actual lender.

d. Non-CDGA Grant Sources

For any grant source, the executed acknowledgment letter(s) must contain the following:

1. The name of the grant Source;
2. The amount of the grant;
3. A pay-in schedule detailing when the grant will be available as a source to the Project; and
4. Any outstanding requirements to be met prior to grant availability.

e. Acquisition

The Project budget in the Non-Congregate Shelter Common Application may only include the acquisition costs attributable to the Project Site. The required site control documentation (**Section 4.F**) must evidence the cost of acquisition. If site control documentation is for a

property is larger than the Site, a detailed narrative and calculation of the Site sale or lease price on a per square footage basis must be submitted. Site acquisition costs indicated in the Non-Congregate Shelter Application must match the site control documentation and/or provided supplemental narrative.

In the case of the acquisition of existing buildings from an unrelated third-party entity, the Project Applicant must submit an appraisal to substantiate the acquisition price prior to initial closing. In the case of a related-party acquisition of land and/or existing buildings, in which one entity will be purchasing or has purchased the property from a related entity, the Project Applicant must submit an appraisal to substantiate the acquisition price at time of Project Application; CDGA will review the submitted appraisal and permit the use of the requested acquisition price in the Project budget at its sole discretion. For a Project that includes the rehabilitation of existing buildings, CDGA will defer to the "As-Is" property value indicated in the appraisal to determine value. For projects larger than the anticipated number of HOME-ARP NCS units, acquisition costs will be awarded on a prorated basis to determine the amount eligible for reimbursement.

f. Grand Total Construction Costs

At time of Project Application, the Project Applicant should enter the projected construction costs (the "Hard Costs") in the Non-Congregate Shelter Application. All costs expected to be reflected in the contract between the Applicant and the general contractor should be included in this estimate. Note that, per the Non-Congregate Shelter Application, the grand total construction costs does not include budgeted construction contingency costs.

At time of financial closing, the construction cost budget reflected in the Non-Congregate Shelter Application must match the final Construction Contract figures as calculated in the Non-Congregate Shelter Initial Application.

During construction, the Construction Contingency line item may be drawn on, subject to CDGA approval in line with the Change Order process as described in the CDGA's Standards for Architectural Planning and Construction.

g. Developer Fee

A Project's developer fee may not exceed 10% of the Project's total development costs.

h. Environmental Remediation

If it is expected that a Project Site(s) will require remediation, the development budget must include both an environmental remediation line item to cover the scope of the remediation, and an environmental remediation contingency line item in the amount of 10% of the remediation costs.

i. Furniture, Fixtures, and Equipment

Any items included in the development budget as furniture, fixtures, and equipment ("FF&E") must meet the following qualifications. The examples below are a representative list rather than a complete list, and payment of these items will be at CDGA's discretion. All items considered FF&E shall be new or will require CDGA approval if refurbished.

1. **Furniture** includes items which are generally used by the residents, guests, and staff for living and operating the project, including but not limited to: beds, desks, chairs, couches, and office file cabinets.

2. **Fixtures** include items which could be considered personal property but due to permanent attachment are now considered as being part of the real estate, such as window blinds and built-in cabinetry.
3. **Equipment** is considered as having a contributory association with the operation of the Project and is usually considered personal property as it is not readily attached to the real estate, such as computers, laundry equipment, appliances, and snow blowers.

The Non-Congregate Shelter Application includes a Furniture, Fixtures, and Equipment any costs associated with these items.

Supplies are considered general purpose items and as such are not FF&E items. Examples of supplies are hand and power tools including items that could be removed from the designated shop or location, mops, cleaning solutions, trash cans, garden utensils, portable sports equipment, and computer ink and paper.

j. Expenses/Operations

Annual operating expenses must be adequate and reasonable, customary, and necessary when compared to similar Projects, location, and population served. In order to substantiate operating expenses, Projects under this RFP shall present a plan to cover anticipated annual operating costs for the Project.

If the Project is replacing existing shelter capacity, ensuring no loss of current operational shelter beds, the Project will include evidence of committed funding other verifiable operating funding sources which may include philanthropic contributions which will be considered at the CDGA's sole discretion. If the Project is proposing expanded capacity, the plan will include evidence of the organization's ability to cover operational expenses including a plan to secure additional sources of funds for any operating gap during the Restricted Use Period

k. Replacement Reserves

CDGA will review the Project's reserves to determine its long-term viability. Projects must meet the following minimum reserve requirements. Any deviations from the below requested must be declared at the time of Application.

All Applications must capitalize a replacement reserve in the development budget and fund ongoing annual replacement reserve contributions per unit from operations. The Developer must ensure replacement reserves funding, only if the project requires, during the Restricted Use Period.

l. Real Estate Tax Reserves

All Applications must capitalize a real estate tax reserve to pay real estate taxes during the construction period of the estimated annual real estate taxes in the first year of Project operations declared in the development budget.

All Applications must include evidence of how construction period real estate taxes and operations period real estate taxes were determined.

m. Insurance Reserves

All Applications must budget an adequate insurance reserve to pay insurance during the construction period in the first year of Project operations in the development budget. Additionally, the operating pro forma must include the anticipated annual insurance expense.

n. Applicant Financial Capacity

Applicant must demonstrate financial capacity to support the proposed Project during construction and through the Restricted Use Period. The Applicant's net or liquid assets must exceed the cash needs of the Project. Financial capacity risks will be assessed by requiring the Applicant submit, as available:

1. The Applicant's three most recent independent audits, including Single Audits and Management Letters;
2. Current fiscal year-to-date income and expense statement;
3. Current balance sheet showing all assets and liabilities, including contingent liabilities (e.g., construction loans or operating deficit guarantees);
4. A list of any litigation, pending judgments, and/or bankruptcies within the past seven years that apply to the Applicant, any principals or officers, or any affiliated entities (any litigation and pending judgments must be described);
5. A list of any funding contracts that were terminated or not renewed based on performance and/or compliance issues; and
6. A list of any unresolved monitoring findings from any Applicant funding source.

Submitted documentation will be reviewed to determine the following:

1. If the financial management system complies with Generally Accepted Accounting Principles;
2. If there are any material weaknesses in the entity's financial management system or internal controls;

3. If the developer or owner is a nonprofit organization, its audit evidences that it meets the financial accountability standards of 2 CFR 200.302 regarding financial management and 2 CFR 200.303 regarding internal controls;
4. That sufficient financial resources are available to cover any shortfalls during the Project's construction and Restricted Use Period, which will include an analysis of the Applicant's net worth, portfolio risk, litigation, pending judgments and bankruptcies, pre-development funding, and liquidity and;
5. The Applicant has recent, ongoing, and successful experience with development of similarly sized and regulated shelter or facilities, sufficient staff with specific skills and experience appropriate to their roles in the project, and financial capacity to meet its current financial obligations and risks of the Project through the Restricted Use Period.

Section 5: Application Scoring Criteria

| Scoring Category | Maximum Points | Category Weight |
|---|----------------|-----------------|
| Leveraging Other Capital Funding Sources | 5 | 5% |
| Service Provider Experience | 10 | 10% |
| Shelter Operator Experience | 15 | 15% |
| Demonstrated Ability to Provide Positive Shelter Outcomes | 10 | 10% |
| Proven Need in Community | 10 | 10% |
| People with Lived Experience Included in Project Design | 5 | 5% |
| Services Offered | 25 | 25% |
| Food Prep or Kitchen Space Availability | 10 | 10% |
| Access to Public Transit | 10 | 10% |
| Total | 100 | 100% |

A. Leveraging Other Capital Funding Sources

Projects that pass all mandatory application criteria as outlined in **Section 4** will be scored on the scoring criteria detailed in this section and ranked according to total score. Points will be awarded based solely on the information submitted in the Application. CDGA reserves the right to verify information submitted in the Application.

CDGA may deny points if the correct documentation or required information for each scoring category are not submitted, or if information available to CDGA negates a claim for points. The Applicant's commitment to various scoring criteria shall, at the sole discretion of CDGA, be binding and shall be incorporated into a Written Agreement.

Projects may earn five points for leveraging CDGA resources amounting to more than 10% of the Project's development budget (or "Total Development Cost").

Leveraged resources under this category are defined as funds provided by a non-CDGA source. All leveraged resources must be reflected in the Project budget. Only sources allocated to uses that fall within the Project's Site boundaries will be considered for financial leveraging.

In Projects where the leveraged resource is a contribution of direct financial assistance from an area employer that is otherwise not participating in the development of the Project, the assistance must be in

the form of an unsecured loan giving no foreclosure rights to the employer or a grant giving no recapture rights to the employer.

In Projects where the acquisition is financed in whole or in part through a seller’s note, the amount of the seller’s financing will not be considered a leveraged resource under this category. At its sole discretion CDGA may allow seller’s notes from health and hospital systems to qualify for points under this category.

B. Service Provider Experience

Projects whose development teams include one or more service provider(s) that demonstrate significant experience beyond the mandatory experience requirements as outlined in **Section 4.D** may earn 10 additional points in this category and 15 points for shelter operations experience. To qualify for points in this category, service providers must demonstrate their experience working with and providing services to the QP(s) that will be served through the Project. The Preliminary Project Assessment must substantiate applicable experience. In addition, a narrative clearly detailing the service provider(s)’ experience serving at least one of the QPs that the proposed Project will be serving is required -also at time of Application.

Projects that demonstrate between 5 and 10 years of applicable experience will be awarded five points, Projects that demonstrate 10 to 20 years of experience will be awarded 10 points. All other Projects with 20-years or more applicable experience will be award 15 points in this category.

C. Shelter Operator Experience

Projects whose development teams include one or more Applicant(s) that demonstrate significant experience operating a fixed site shelter beyond the mandatory experience requirements as outlined in **Section 4.D** may earn up to 15 points in this category. Applications must substantiate their applicable experience. In addition, a narrative clearly detailing the Applicant(s)’ experience is required initially at time of the Preliminary Project Assessment.

Projects that demonstrate applicable experience in this category will be awarded points as follows:

| Shelter Operator Experience Requirements | |
|---|---------------|
| Demonstrated Years’ Experience | Points |
| 0-4 years | 0 |
| 5-10 years | 5 |
| 10-20 years | 10 |
| Over 20 years | 15 |

D. Demonstrated Ability to Provide Positive Shelter Outcomes

Projects whose development teams include one or more Applicant(s) who can demonstrate past performance of achieving positive shelter outcomes may earn up to 10 points.

To provide evidence in this category, Applicants must provide a narrative detailing the positive outcomes achieved in the shelters which they have operated, and must substantiate this narrative using data from HUD’s Homeless Management Information Systems (“HMIS”) or comparable databases for the one-year period ending June 30, 2025.

The narrative and/or data must specify the number of people and/or households served through the Applicant(s)' shelter(s), as well as the number of people and/or households who exited to positive permanent destinations. The data definitions in provided in the data reporting should be consistent with the responding specifications for the ESG Program.

Points will be awarded based upon the percentage of demonstrable positive shelter outcomes achieved for residents of Applicant(s)' shelters as follows:

| Positive Shelter Outcome Requirements | Points |
|---------------------------------------|--------|
| Between 26% and 50% | 4 |
| Between 51% and 75% | 8 |
| 76% and over | 10 |

E. Proven Need in Community

Projects may earn up to 10 points for demonstrating a proven need for Non-Congregate Shelter in the community which it intends to serve. The community should correlate with the PA identified by the Applicant as a part of the PPA submission, unless otherwise stated and substantiated in the narrative.

Applicants must provide a written narrative that cites objective data supporting the need for the Project. Narratives will be evaluated on the extensiveness of their responses, as well as inclusion of the following data sources:

- Comparison of the community’s 2025 Point-in-Time (PIT) Count of people experiencing homelessness compared to the count of shelter beds;
- Data on the number of people turned away from shelter, as reported to HMIS and/or;
- Data and/or recommendations from a community needs assessment provided by an independent consultant.

F. People with Lived Experience Included in Project Design

Projects may earn five points for including persons with lived experience of homelessness in the design of the project.

Applicants that provide a written narrative that addresses all of the following components will be awarded five points:

1. How persons with lived experience of homelessness were or will be included in the design of the project, including in the design of the physical space and any services to be offered by the shelter provider;
2. How many persons with lived experience of homelessness were or will be involved in the project design process;
3. How the engagement and feedback provided by persons with lived experience of homelessness was or will be meaningfully incorporated into the project design; and
4. Whether and how persons with lived experience of homelessness were or will be compensated for their time and participation in the project design process.

G. Services Offered

Projects may earn additional points for providing various types of services or service coordination that will be made available to the Project’s shelter residents beyond the mandatory requirements as outlined in **Section 4.D.ii.**

As a part of this RFP’s mandatory requirements, Applicants must provide a written shelter operations and service plan narrative outlining the Project’s approach to shelter. To earn points in this category, Applicants must confirm if and how the following services will be made available to the Project’s residents through one of the following:

1. An Applicant that is a member of the Project’s development team;
2. A service provider that is a member of the Project’s development team; and/or
3. Coordination with other community-based providers.

Points in this category will be awarded cumulatively. To be awarded points for each of the eligible service categories defined in the table below, the written shelter operations and service plan narrative must address the following components for each service:

- How coordination for the services will occur: and
- What organization will be responsible for the service referenced and service staffing as evidenced through a MOU or other binding agreement.

CDGA expects all Projects to employ low-barrier policies and procedures, and participation in any services must not be a requirement for shelter admission or occupancy.

Points in this category will be awarded as follows:

| Services Offered | |
|---|---------------|
| One or more service provided per category | Points |
| <ul style="list-style-type: none"> • Case management | 5 |
| <ul style="list-style-type: none"> • Mental health services • Substance abuse treatment services/substance use services • Outpatient health services | 5 |
| <ul style="list-style-type: none"> • Housing search and placement services • Assistance with moving costs | 5 |
| <ul style="list-style-type: none"> • Life skills training • Childcare | 5 |
| <ul style="list-style-type: none"> • Education services • Employment assistance and job training | 5 |
| Maximum Points | 25 |

H. Food Prep or Kitchen Space Available to Residents

Projects may earn up to 10 points for providing access to food preparation or kitchen spaces to the Project’s residents. Points in this category will not be awarded cumulatively.

Projects will be awarded five points for providing communal kitchen space that residents can access and use to store, prepare, and serve food in a safe and sanitary manner in a “limited” capacity. Kitchen space will be considered “limited” if clients do not have 24-hour access to the kitchen space.

Projects will be awarded 10 points for providing 24-hour access to a communal kitchen space that clients can access and use to store, prepare, and serve food in a safe and sanitary manner, or for providing kitchen/kitchenette space within each unit.

To qualify for points in this category kitchen spaces, whether communal or in individual units, must comply with the CDGA’s requirements. CDGA guidelines state that kitchens in community spaces must, at a minimum, have the following:

1. A sink;
2. A range/oven (a microwave may not substitute a range/oven);
3. A refrigerator; and
4. Base and overhead storage.

In municipalities requiring a commercial range hood above a range, the range/oven may be omitted, but a letter confirming this requirement as part of the municipal code must be provided to the CDGA for review.

| Food Prep or Kitchen Space Requirements | Points |
|---|---------------|
| Limited kitchen/prep space available to residents | 5 |
| 24-hour access to common kitchen available to residents | 5 |
| Kitchen/kitchenette space provided in each unit | |
| Maximum Points | 10 |

I. Access to Public Transit

Projects may earn up to 10 points for access to transportation. Points in this category will not be awarded cumulatively. Projects may be awarded 10 points for transit-oriented development if the proposed Project can demonstrate that it is located in close proximity to fixed-route public transportation, excluding inter-city transportation.

“Close proximity” is defined as being within a half-mile radius of a fixed route transit stop, defined as: a bus stop serving local destinations, with scheduled operations beginning no later than 8:00 a.m. and ending no earlier than 8:00 p.m., Monday through Friday. Transportation routes and distance to the Project Site should be identified on a map submitted with the Application along with a current schedule for the routes being considered.

Section 6: Post-Award Requirements

If the City of Milwaukee Common Council approves the NCS Application, a Written Agreement between the applicant and Community Development Grants Administration (CDGA) will be issued specifying the terms, conditions, documentation, and timelines under which the CDGA will fund the Project. If the Applicant fails to meet all the Written Agreement requirements within the specified deadlines, as determined solely by the CDGA, funds will be withdrawn.

As stipulated in the Written Agreement, the Applicant shall execute and submit a grant agreement, and any other additional documentation deemed necessary by the CDGA, in its sole discretion, for the Project.

Aside from certain costs associated with preparing a successful Application (for example, Physical Needs Assessments), no Project costs may be incurred prior to the Written Agreement being executed as HOME-ARP NCS funding is by reimbursement for any and all awarded Projects. Closing shall be at such time as the Applicant satisfies the terms and conditions of the Written Agreement as determined by the CDGA in its sole and absolute discretion.

Applicants must agree to comply with all applicable federal and State of Wisconsin requirements. Such requirements may have significant impact on the costs and complexity of the Project.

Applicants are expected to be familiar with the full range of all legal and statutory compliance requirements applicable to the grant funds awarded and to obtain all necessary information and advice so that they can comply with such requirements. The following is a non-exhaustive summary of certain aspects of the major compliance requirements.

A. Approval of Final Plans and Specifications

CDGA must approve the complete final architectural plans and specifications for the Project. The complete plans and specifications must incorporate all mandatory criteria as well as any scoring criteria for which the Project received points. In addition to the Project plans and specifications, the following documents may be required, as determined by CDGA in its sole discretion:

1. A copy of the Wisconsin Architectural Registration Certificate for the design firm and/or the sole proprietor;
2. An Architect's Error and Omissions Certificate of Insurance;
3. The ALTA/ACSM Land Title Survey; and
4. If determined by CDGA to be applicable, a soils boring report describing the subsurface exploration, analysis relative to mining hazards, and geotechnical recommendations for the Site.

B. Environmental Assessment

If grant funds are awarded, a determination will be made as to whether an environmental clearance from HUD will be required. If such clearance is required, the Applicant may not undertake, or commit any funds to, physical or choice-limiting actions, including property acquisition, demolition, tenant relocation, rehabilitation, conversion, repair, or construction prior to receipt of environmental clearance from HUD.

C. Excluded Parties

The Excluded Parties List System ("EPLS") includes information regarding entities that have been debarred, suspended, proposed or disqualified under the non-procurement common rule, or otherwise declared ineligible from receiving federal contracts, certain subcontracts, and certain federal assistance and benefits. CDGA will check all names of all Participants against the EPLS found on the federal System

for Award Management website at www.sam.gov. and may rescind a conditional approval funding if a Participant appears on EPLS.

D. Labor Standards

CDGA will implement labor standards on demolition, construction, and rehabilitation Projects. In instances where the Project utilizes federal funds from CDGA and must ensure the Project complies with Davis Bacon and Related Acts (“DBRA”). Federal Regulations can be found in part from the Code of Federal Regulations (Title 29 CFR, parts 1,3,5,6 and 7). In instances when DBRA is not applicable to a Project, CDGA must ensure the Project abides by the Wisconsin Prevailing Wage Act (Wis. Sta. 66.0903). If a loan or grant from another source requires a Project to comply with the Davis-Bacon Act, 40 USC 276a et seq., the requirements of the other source will prevail.

E. Fair Housing

Fair housing is otherwise known as equal housing opportunity. Federal, state, and various local laws legally define fair housing and identify specific protected classes based on documentation of past patterns of discrimination. The following is a non-exhaustive list of state and federal fair housing laws:

1. Fair Housing Act of 1968 as amended in 1988 (“Fair Housing Act”)
 - a. Title VIII of the Civil Rights Act of 1968, also known as the Fair Housing Act, prohibits discrimination based on race, color, religion, national origin, sex, familial status, or disability and requires landlords to make reasonable accommodations and modifications for tenants with disabilities.
 - b. The Fair Housing Act requires the Secretary of HUD to administer housing and development programs and activities that “affirmatively further” (actively support and encourage) fair housing. Participants must undertake specific activities to affirmatively further equal opportunity and fair housing and must assure all activities and services are accessible to persons with disabilities.
2. Section 504 of the Rehabilitation Act of 1973 (“Section 504”)
 - a. Section 504 prohibits discrimination in federally funded programs. For federally financed housing rehabilitation Projects that result in substantial alteration, Section 504 requires five percent of the dwelling units, or at least one unit, whichever is greater, to meet Uniform Federal Accessibility Standards (“UFAS”) or a standard that is equivalent or stricter, for persons with mobility disabilities. An additional two percent of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities. Alterations are considered substantial if they are undertaken to a property that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility.
 - b. If the subject property has fewer than 15 units or the cost of alterations is less than 75% of the replacement cost of the completed facility and the recipient has not made 5% of its units in the Project accessible to and usable by individuals with disabilities, then the requirements of 24 CFR 8.23(b) – Other Alterations apply.
3. The Americans with Disabilities Act of 1990 (“ADA”)
 - a. The ADA prohibits discrimination on the basis of disability in government-funded programs, including housing programs (“Title II”), as well as public accommodations (“Title III”) which means that rental offices, homeless shelters, and other on-site business locations used by the

public, including common areas of public/assisted housing, must be accessible to persons with disabilities.

4. *Olmstead v. L.C.*, 527 U.S. 581 (1999)

- a. *Olmstead v. L.C.* found that persons with disabilities have a right to receive their services in the most integrated setting according to their needs and desires. The following Guidance on *Olmstead* and how it relates to housing has been released by HUD and the U.S. Department of Justice: <https://archives.hud.gov/news/2013/OlmsteadGuidnc060413.pdf>

F. Section 3 and Minority- and Women-Owned Business Enterprises

If a Project is awarded a grant of \$200,000 or more, the Project must comply with Section 3 of the Housing and Urban Development Act of 1968. In addition, hiring practices shall comply with any applicable Wisconsin or Federal requirements, including but not limited to the Business Enterprise for Minorities, Females, and Persons with Disabilities Act (30 ILCS 575).

G. Regulatory Period

Project Owners will be required to execute a Regulatory Agreement with CDGA whereby the Owner shall agree to maintain unit affordability and serve the targeted populations for a minimum period of 10 years.

H. Reporting and Monitoring

CDGA will assess property and unit condition, compliance with targeting HOME-ARP QPs requirements, and financial stability through submission of audits. CDGA will inspect the Project from time to time; the Owner must cooperate with such physical inspections.

Appendix I: Definitions

“Allocation Plan” – shall mean the Community Development Grants Administration’s submitted and HUD-approved HOME-ARP Allocation Plan, which shall dictate and guide its distribution of HOME-ARP funds under this RFP. HUD required an Allocation Plan to describe how each Participating Jurisdiction intends to distribute its HOME-ARP funds and how they will use these funds to address the needs of HOME-ARP qualifying populations.

“Applicant” – shall mean a duly formed, validly existing entity, organized under the laws of the State of Wisconsin, or any other State, that is applying for funds for a Project pursuant to this Request for Applications. The Applicant shall own or control the Owner of the Project. Project consultants and other like professionals shall not be considered as Applicants.

“Application” – shall mean an entire set of required and requested documents, in electronic form, as prescribed in this Request for Proposals and submitted by an applicant to the Community Development Grants Administration.

“Area Median Income” (“AMI”) – shall mean the median income of the county or the metropolitan statistical area in which the Project is located, adjusted for family size, as such adjusted income and median income for the area are determined from time to time for purposes of Section 8 of the United States Housing Act of 1937.

“Capital Needs Assessment” – shall mean a property inspection report that estimates the future cost of property maintenance and critical repairs for a property.

“CDGA” – City of Milwaukee Community Development Grants Administration

“Davis Bacon Act” – requires contractors and subcontractors working on federally funded or assisted construction projects to pay laborers and mechanics locally prevailing wages and fringe benefits.

“Emergency Solutions Grants Program” (“ESG Program”) – shall mean the federal grant program designed to assist people with quickly regaining stability in permanent housing after experiencing a housing crisis and/or homelessness. The ESG Program authorizes HUD to make grants to States, units of general-purpose local government, and territories for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re- housing assistance.

Environmental Assessment – a study that identifies the environmental impact of a land development’s impact analyzed by a set of parameters including biodiversity, environmental justice, wetlands, air and water pollution, traffic, geotechnical risks, public safety, or hazardous substances.

“Expanded Coordinated Entry” (“CE”) – shall mean a centralized or coordinated process required for the CoC and ESG program to coordinate program participant intake, assessment, and referrals within the CoC area. Under 24 CFR 578.3, HUD requires each CoC to establish and operate a standard CE system with the goals of increasing the efficiency of local crisis response and improving fairness and ease of access to resources for eligible homeless and at-risk populations.

“Funding Agreement” – shall mean the document that outlines the terms and conditions of a funding award.

“Habitability Standards” – at project completion, HOME-ARP NCS units and common areas must meeting all applicable State and local codes, ordinances, requirements and HUD’S Lead Safe Housing Rules 24 CFR Part 35.

“HMIS” - Homeless Management Information System, a data collection system used to track information concerning individuals and families experiencing homelessness.

“HOME Investment Partnership Program” (“HOME”) – shall mean a federal block grant program created by the National Affordable Housing Act of 1990. Block grants are made to state and local governments, known as Participating Jurisdictions, who distribute the funds through local affordable housing programs, including loans or grants for rental housing. Participating Jurisdictions such as the CDGA make project awards and monitor project compliance throughout the affordability period.

“HOME-ARP” – shall mean the HOME Investment Partnerships American Rescue Plan Program, which provides funding to HOME Participating Jurisdictions to reduce homelessness and increase housing stability across the country.

“HUD” – U.S. Department of Housing & Urban Development.

“Identity of Interest” – shall mean the existence of any of the following conditions: (i) when one or more of the officers, directors, stockholders, members, or partners of the Owner is also an officer, director, stockholder, member, or partner of any other Participant; (ii) when any officer, director, stockholder, member or partner of the Owner has any financial interest whatsoever in any other Participant; (iii) when any Participant advances any funds or sells or donates property to the Owner; (iv) when any Participant provides and pays, on behalf of the Owner, the cost of any architectural services or engineering services other than those of a surveyor, general superintendent, or engineer employed by any other Participant in connection with its obligations under its contract with the Owner; or (v) when any Participant takes stock or any interest in the Owner entity, as part of the consideration to be paid.

“Major Systems” – include systems of structural support, roofing, cladding, weatherproofing, plumbing, electrical and HVAC.

“Milwaukee Continuum of Care (CoC)” – a consortium of housing, emergency shelter and supportive services providers working alongside community-based organizations and stakeholders to address homelessness in the community.

“Minimum Use Period” - All HOME-ARP projects must be operated as NCS for a minimum period of time prior to conversion, which varies based on the project type.

“Non-Congregate Shelter” (“NCS”) – shall mean one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement.

“Nonprofit” - a legal entity operating for social or charitable cause and not for financial gain.

“Owner” – shall mean the duly formed, validly existing, single purpose entity, organized under the laws of the State of Wisconsin, or any other state, that is awarded funds for a Project pursuant to this Request for Funding and which owns or will own the Project. The Owner shall be owned or controlled by the Applicant.

“Participant” – shall mean a member of the Project’s development team, including applicants, general contractor, architect, and/or property manager.

"Participating Jurisdiction" ("PJ") – shall mean the term given to any state, local government, or consortium that has been designated by HUD to administer a HOME Program.

"Project" – shall mean an existing or proposed qualified project which satisfies, or will satisfy, all of the requirements of this Request for funding.

"Qualifying Populations" ("QPs") – shall mean the individuals or families which HOME-ARP funds must be used to primarily benefit, which are as follows:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1))
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

"Referral Process" – shall mean the method used to identify the next individual or household to receive assistance after an initial assessment process that determines the individual or household is an eligible HOME-ARP Qualifying Population. Participating Jurisdictions are required to provide access to HOME-ARP projects and activities to all four HOME-ARP QPs through one or more of the referral methods described in HUD Notice CPD 21-10. All NCS Projects funded under this RFP must use:

- Referral Method: Use of HOME-ARP Expanded Coordinated Entry, as outlined in HUD Notice CPD 21-10, to manage referrals for projects funded through HOME-ARP. The local coordinated entry system will expand to accept all qualifying populations while still giving preference to those who meet locally established prioritizations.

"Restricted Use Period" – shall mean the period of time HOME-ARP NCS Projects must comply with HOME-ARP requirements. For both acquisition-only Projects and for rehabilitation Projects, the Restricted Use Period is 10 years. The NCS may remain as HOME-ARP NCS for the Restricted Use Period or may be used as NCS under the ESG Program. CDGA will not allow for conversion of the NCS units into permanent housing during the Restricted Use Period.

"Site" – shall mean a parcel of land on which the Project will be developed, described by a unique legal description which will be encumbered by the Regulatory Agreement. A Project may consist of multiple Sites.

"State and Local Fiscal Recovery Funds" ("SLFRF") – shall mean the Coronavirus State and Local Fiscal Recovery Funds ("SLFRF") program authorized by the American Rescue Plan Act ("ARPA"), which delivered \$350 billion to state, territorial, local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency.

"Written Agreement" – shall mean a document that outlines the terms of the period during which a Project must comply with the occupancy restrictions (both income and rent) and amenities represented in the Project's Application.