

**PUBLIC HEARING COMMENTS ON 2026 ANNUAL PUBLIC HOUSING AUTHORITY (PHA) PLAN, ADMISSIONS AND CONTINUED OCCUPANCY PLAN, AND ADMINISTRATIVE PLAN—
Topic #1-----Grievance Policy**

Public Hearing Comment #1—From Cornelius Sawyer, Highland Gardens

Speaking on behalf of the RAB Board, when you read the comments from the RAB, you will see some changes made preemptively from the discussion. My biggest concern with showing both HUD and the City that we are trying to do better, I am very concerned about the approach towards the grievance policy. I've talked to residents and they made it clear because one of the terms in the policy is that they want to use a non-biased employee. For some places that might work, but in an agency when you see an inconsistency with the employees to be non-biased, I suggest that we should strike that from even said federally that we would try something like that.

The Grievance Policy does not go far enough. It needs to be made clear that with the RAB Board we are planning to buy those buildings back so we should be making the same provisions as the grievance policy—the grievance policy that will be used when the buildings get bought back. And, the grievance policy should state how are we going to handle grievances with resident organizations and housing. I think if we can get this grievance thing right. I know you want to find a new Director, but I also think we need to have checks and balances that will apply to the new Director. I think if we can get the Grievance policy right, it would bring back a great service to bringing back public trust.

HACM Response to Public Hearing Comment #1:

Regarding the public housing grievance policy, HACM is currently finalizing the public housing grievance policy, the public housing lease, and the public housing resident handbook and will bring to the board for review at possibly the November Board meeting after a 30-day period for public housing residents to review and comment.

HACM's existing Public Housing Grievance Policy has the requirement for an independent attorney to act as the Chair of the Review Panel, with the other two members of the panel made up of public housing residents selected from a pool of residents to act on the panel. During COVID, the attorneys that HACM previously relied on to act as a Hearing Officer dropped away from the program.

Therefore, in early 2024, HACM issued and advertised a Request for Proposal (RFP) for Hearing Officer Services, that sought attorneys that could act as a Grievance Hearing Officer. It outlined the scope and requested as part of the response that they identify their proposed billing rate (either for a per-hour basis or a per-case basis). There were no responses. In addition, while it was not advertised with the State Bar, HACM's City Attorneys also reached out to attorneys in the area to promote the opportunity.

Given the lack of a response to the RFP for attorneys to act as the Chair of the Grievance Review Panel, HACM had originally proposed using HACM staff persons that are knowledgeable but are independent of the original decision who could serve as the Chair of the Review Panel. This is what many housing authorities nationwide do for grievance hearings. Also, we want to point out that each Grievance Panel is made up of 3 members (the Chair, and the other two individuals must be public housing residents selected from a pool of public housing residents that are interested in serving on the panel).

However, in response to the comments from a RAB member during the RAB review of an early draft of the Grievance Policy and to provide the policy with more flexibility so it will not need to be modified again in the near future, HACM did modified the current draft of the proposed Grievance Procedures to include the possibility of the Chairperson of the Review Panel be either an employee independent of the original decision or a contractor who would serve as the Chairperson.

There is also language in the Grievance procedures that HACM will endeavor to appoint a member to the position of Review Board Chairperson who has experience in conflict resolution, property management, administrative hearings, and who has specific prior experience with the Public Housing program.

The goal is to ensure that any of the three members of a Grievance panel, whether they are the panel chairperson (staff or contractor) or a public housing resident member of the panel, have the ability to be impartial and to listen to the evidence and weigh the decision based on the evidence presented.

It is anticipated that at first, the chairperson could start out as staff person who has taken hearing officer training while we examine the possibility and cost of hiring an outside hearing officer via another Request for Proposal.

Regarding the portion of the comment regarding RAD, the conversion to RAD still allows certain grievance procedures to remain. Besides the right to informal hearings connected to the Project-based voucher (PBV) program, the resident also has the right to an informal hearing for any dispute with the Project Owner/Contract Administrator regarding the individual's lease. HACM properties do currently hold those informal hearings.

HUD Guidance on Grievance Process for RAD Developments, Pages 69-70 of the final implementation of RAD Revision 4 from HUD states the following regarding Grievance Procedures for PBV RAD developments:

“Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),³⁸ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual’s lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident’s rights, obligations, welfare, or status.

1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).

2. For any additional hearings required under RAD, the Project Owner will perform the hearing.

ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.

iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).

iv. The Project Owner provides opportunity for an informal hearing before an eviction.”

Regarding grievances between a housing authority and a resident organization, HUD’s Grievance procedures are to assure that a PHA tenant is afforded an opportunity for a hearing if the tenant disputes within a reasonable time any PHA action or failure to act involving the tenant's lease with the PHA or PHA regulations which adversely affect the individual tenant's rights, duties, welfare or status. It is specific to an individual resident and their tenancy, and are not really related to resident organizations.

If there is a dispute between a resident organization and a public housing authority regarding an issue, that could be potentially addressed with the assistance of HUD field office or by using an independent pro-bono or paid arbitrator agreed to by both parties, depending on the subject matter of the dispute.

Public Hearing Comment #2: Written Comment submitted by Connor Goggans, Senior Real Estate Project Manager for Milwaukee County Housing Division

Mr. Goggins recommends that the 2026 Administrative Plan include a “partnership preference” to allocate a set-aside of HCV’s per year directly to partner agencies, with the benefit that such households could then be supported with supportive services, such that Milwaukee County Housing Services could deliver. He recommends an approach used by Columbus Metropolitan Housing Authority. The entire written comment is attached at the end of this document.

HACM Response: HACM does currently have a homeless preference in its Administrative Plan where persons that are eligible for the preference include individuals and families that meet the definition of homeless as defined in Category 1 or Category 4 homelessness, as defined in HUD’s PIH Notice 2013-15 (HA). HACM currently partners with the Continuum of Care or Coordinated Entry to verify referrals for the homeless preference.

Currently, HACM is in shortfall position and, per HUD, is not able to issue new HCV vouchers at this time. HACM believes it will exit shortfall within the next 6 months or so.

The suggestion for a “Partnership Preference” is an interesting one, though we do not fully understand the difference between the suggested language from the comment versus the language for homeless preference currently in HACM’s Administrative Plan, except for a possibility of supportive service provision from the County.

Due to our shortfall position, this gives us a few months to better understand the recommendation and determine if it would be an improvement over our current homeless preference, and whether we wish to modify our Administrative Plan.

EMAIL FROM CONNER GOGGANS, MILWAUKEE COUNTY

From: Connor Goggans <Connor.Goggans@milwaukeecountywi.gov>

Sent: Wednesday, August 6, 2025 11:13 AM

To: communications <communications@milwaukee.gov>

Cc: Mathy, James <james.mathy@milwaukeecountywi.gov>; Eric Collins-Dyke <Eric.Collins-Dyke@milwaukeecountywi.gov>; Damir Djidic <Damir.Djidic@milwaukeecountywi.gov>

Subject: Public Comment on HACM 2026 Agency Plan and Administrative Plan – Proposal for Partnership Preference

Dear Mr. Barbeau and the HACM Board of Commissioners,

Thank you for the opportunity to provide public input on HACM's 2026 Annual Agency Plan and related policy documents. I would like to commend HACM for its continued commitment to serving Milwaukee's most vulnerable residents through both its Public Housing and Housing Choice Voucher (HCV) programs, among others.

As part of this public comment process, I personally and respectfully submit the following policy recommendation for inclusion in the 2026 Administrative Plan, as I have become aware of the possibility for PHA's to initiate and maintain a partnership preference, utilize mainstream to allocate a set aside of HCV's per year directly to partner agencies, with the benefit of such households being supported thru supportive services, which Milwaukee County Housing Services could at the very least fulfill. This was brought to light from a recent discussion I had with Columbus, Ohio's UFA/CoC Lead Agency, who receives a set aside of 94 HCV's per year – they claim both the CoC and PHA are happy with this arrangement, as it helps utilization, lease-up rates & timelines, as well as housing stability of the households, among other things.

Recommendation: Establish a "Partnership Preference" to enable direct HCV allocations to partner agencies for eligible populations

I propose that HACM update its Section 8 Administrative Plan to include a Partnership Preference category within its admissions preferences structure. This addition would allow HACM to establish written agreements with qualified partner organizations—such as Milwaukee County Housing Services—to facilitate the direct allocation of Housing Choice Vouchers to eligible households, particularly those experiencing or at risk of homelessness, institutionalization, or housing instability.

This model mirrors the successful approach adopted by Columbus Metropolitan Housing Authority (CMHA), which includes in its Administrative Plan:

Category N: CMHA Partnerships (30 Preference Points)

"CMHA will allocate vouchers for CMHA partnerships that are connected to housing homeless households or other agreed-upon special populations. CMHA, in conjunction with partners, may develop housing initiatives that receive a local preference... These housing initiatives may include a defined number of Housing Choice Vouchers that will be allocated to households meeting specific described criteria."

By creating a similar local priority preference, HACM could:

- Enhance its ability to leverage future HUD allocations (e.g., Mainstream, NED, or targeted HCV rounds); and
- Maximize coordination with Milwaukee County; and
- Increase housing access for vulnerable subpopulations; and
- Build transparent and accountable agreements for targeted voucher usage; and
- Create a structure to support housing outcomes aligned with local policy priorities.

Suggested Administrative Plan Language (New Section):

[Section 4: Preferences]

Partnership Preference – 30 Points

“HACM may enter into formal partnership agreements with qualified governmental entities operating within its jurisdiction to develop housing initiatives that meet the needs of specifically defined populations, including but not limited to individuals and families experiencing homelessness, persons with disabilities, or other HUD-targeted special populations. Under such agreements, HACM may allocate Housing Choice Vouchers on a preference basis to referred households that meet agreed-upon eligibility and screening criteria. These referrals may bypass the lottery pool and be prioritized for voucher issuance, subject to voucher availability and the terms of the partnership.”

I appreciate your consideration of this proposed revision, which I believe will strengthen HACM’s ability to meet local housing needs while aligning with best practices nationally. Please don’t hesitate to reach out if I can assist further in refining this proposal or supporting its implementation. I can get example agreement documents from Columbus if this would be considered further, and that would be helpful.

Sincerely,

Connor Goggan

Connor Goggans (*he/him/his*) | Senior Real Estate Project Manager

Milwaukee County Housing Division

600 W Walnut Ste 100 | Milwaukee, WI 53212

(414) 639-4543 | connor.goggans@milwaukeecountywi.gov | county.milwaukee.gov

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