

**TAB**

**2025-2029**  
**5-Year PHA Plan**  
**HUD-50075-5YR**

<b>5-Year PHA Plan (for All PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires 03/31/2024</b>
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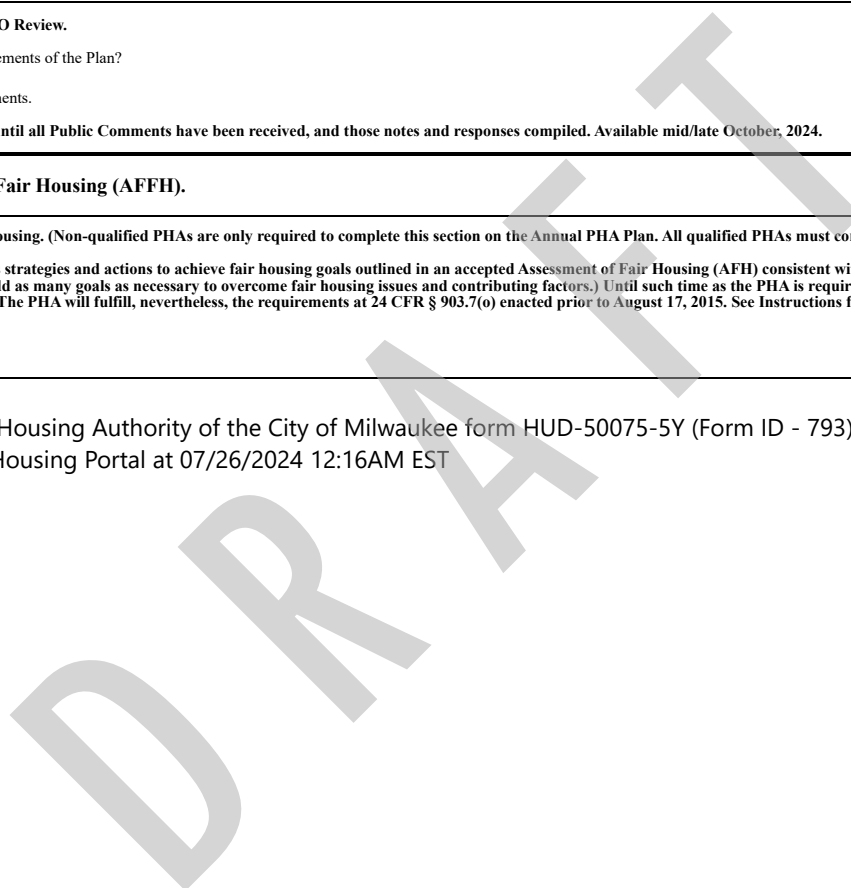
**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

**Applicability.** The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

<b>A.</b>	<b>PHA Information.</b>														
<b>A.1</b>	<p> <b>PHA Name:</b> Housing Authority of the City of Milwaukee      <b>PHA Code:</b> WI002  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): 01/2025  <b>The Five-Year Period of the Plan (i.e., 2019-2023):</b> 2025-2029  <b>Plan Submission Type</b> <input checked="" type="checkbox"/> 5-Year Plan Submission    <input type="checkbox"/> Revised 5-Year Plan Submission                 </p> <p> <b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.                 </p> <p> <b>How the public can access this PHA Plan:</b> The Housing Authority of the City of Milwaukee has posted a copy of its Draft 2025-2029 PHA Five-Year Plan and its Draft 2025 PHA Annual Plan, in addition to its current 2020 to 2024 PHA Five-Year Plan and 2024 PHA Annual Plan, on its website, <a href="http://www.hacm.org/">http://www.hacm.org/</a> for public review. In addition, a copy is located at HACM's main office at 809 N. Broadway, 3rd Floor, Milwaukee, WI 53202                 </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)                 </p> <table border="1" data-bbox="159 827 1536 873"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV						
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<b>B.</b>	<b>Plan Elements. Required for all PHAs completing this form.</b>														
<b>B.1</b>	<p> <b>Mission.</b> State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.                 </p> <p>                     The mission of the Housing Authority of the City of Milwaukee (HACM) is to foster strong, resilient and inclusive communities by providing a continuum of high-quality housing options that support self-sufficiency, good quality of life, and the opportunity to thrive.                 </p>														
<b>B.2</b>	<p> <b>Goals and Objectives.</b> Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low-income, and extremely low-income families for the next five years.                 </p> <p>                     See the attached document "WI002 HACM Milwaukee 50075-5Y B2 Goals and Objectives 240725" for our response.                 </p>														
<b>B.3</b>	<p> <b>Progress Report.</b> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.                 </p> <p>                     See the attached document "WI002 HACM Milwaukee 50075-5Y B3 Progress Report 240725" for our response.                 </p>														
<b>B.4</b>	<p> <b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.                 </p> <p>                     The Violence Against Women Act (VAWA) requires PHAs to describe any goals, objectives, policies, or programs that enable the PHA to serve the needs of victims of domestic violence, dating violence, sexual assault, or stalking. The Housing Authority of the City of Milwaukee (HACM) is committed to full compliance with the Violence Against Women Act (VAWA) (1994, 2005 Reauthorization, 2008 Conforming Amendments, and 2013 Reauthorization). It is our objective to work with others to prevent the types of victimization covered by VAWA to the greatest extent possible and to affirmatively further fair housing. After the 2005 Reauthorization of VAWA, HACM staff and legal counsel consulted with victim advocates in the drafting, revising, and implementation of policy language changes. At that time, HACM worked with advocates from Task Force on Family Violence, American Civil Liberties Union and Legal Action of Wisconsin to incorporate the provisions of VAWA into its Low Rent lease, Admissions and Continued Occupancy Policy (ACOP), Resident Handbook and Section 8 Administrative Plan. The HACM Board of Commissioners adopted the provisions of VAWA at its September 19, 2007 meeting. HACM has continued to review and update its provisions related to VAWA in both the ACOP and the Section 8 Administrative Plan, based on changes in law and regulations. In 2018, changes were made to adopt an Emergency Transfer Policy" and to make related changes in both ACOP and the Section 8 Administrative Plan. In addition to the review and amendment of VAWA language in our policies, HACM also recently made modifications to the Notice of Occupancy Rights under VAWA, and will continue to offer the Notice, along with the certification form and the "You Are Not Alone" pamphlet put out by the Milwaukee Commission on Domestic Violence and Sexual Assault or similar information, to all applicants at the time of eligibility and suitability review for housing, to those who are denied assistance, at the time an individual is admitted, and with any notification of eviction or notice of termination of assistance. Additionally, HACM sends a notice regarding VAWA rights to all property owners participating in the Housing Choice Voucher program. HACM collaborates and makes referrals to a number of public and nonprofit agencies that provide activities, services and programs to assist and support victims of domestic violence (many of them listed in the "You Are Not Alone" brochure), including 24-hour crisis help lines, shelters, counseling services, child abuse services, and medical and legal support. During 2015, HACM provided updated training for staff and various partners, including: those responsible for determining an applicant's eligibility for housing; those at the housing developments responsible for overseeing resident continued occupancy; Housing Choice Voucher staff; social workers and case managers; and public safety staff involved in intervention. The training provided staff with guidance on the provisions of VAWA; how to obtain information needed from the applicant/resident who is seeking protection under VAWA; and on resources and services available in the Milwaukee area for victims of such violence. Resident Advisory Board members and other key resident leaders also received training on how to help victims get connected with services when an actual or threatened domestic abuse incident occurs. In 2017, HACM trained property managers and others managers on updated VAWA forms and policies. HACM will be providing additional training in late 2024 or 2025 for property management, rent assistance, public safety, and other staff that interact with residents to refresh and update knowledge of VAWA regulations, forms and policies.                 </p>														
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>														
<b>C.1</b>	<p> <b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.                 </p> <p>                     HACM may amend or modify any policy, rule, regulation, or other aspect of the 5-year and/or Annual Plan. The Quality Housing and Work Responsibility Act of 1998 does not require an annual update of the 5-Year Plan, but does require that public housing authorities explain any "substantial deviation" from the 5-Year Plans in their Annual Plans. A substantial deviation can include: a) A change or changes to the 5-year goals or objectives that are substantial but do not rise to the level of a "significant amendment" (such as the modification or elimination of a specific objective or minor program                 </p>														

	<p>while retaining the overall strategic goal and accomplishing it through other objectives). b) Additions of a Capital Fund project or non-emergency work items that are not included in the current Annual Statement or 5-year Action Plan in an amount less than \$1,000,000; c) Or changes in the use of replacement reserve funds under the Capital Fund program in an amount less than \$1,000,000; As part of the Rental Assistance Demonstration (RAD), the Housing Authority of the City of Milwaukee is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items: a) The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance; b) Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds; c) Changes to the construction and rehabilitation plan for each approved RAD conversion; and d) Changes to the financing structure for each approved RAD conversion. A "significant amendment or modification" to its 5-Year plan and/or Annual Plan is a change in policy that significantly and materially alters HACM's stated mission, goals, objectives and activities as stated in the Plan. If a change is considered a significant amendment or modification to the 5-Year Plan or to the Annual Plan, it must undergo a public process that includes consultation with the Resident Advisory Board; public notice and public comment period; a public hearing, and approval by HACM's Board of Commissioners; and submission to and approval by HUD. Significant amendments are defined as including the following: a) A change that materially revises the agency's mission, goals, or objectives; b) Material changes to rent or admissions policies or organization of the waiting list; c) Additions of a Capital Fund project or non-emergency work items that are not included in the current Annual Statement or 5-year Action Plan in an amount equal to or greater than \$1,000,000, excluding projects arising out of federally-declared major disasters; acts of God beyond the control of the Authority, such as earthquakes, fires, and storm damage; civil unrest; or another unforeseen significant event; d) Changes in the use of replacement reserve funds under the Capital Fund program in an amount equal to or greater than \$1,000,000; e) Material changes in regard to demolition, disposition, designation, homeownership, capital fund financing, development, mixed financing proposal or conversion activities; f) Any other event or activity that the Authority's Board of Commissioners determines to be a significant amendment to the approved 5-Year Plan or Annual Plan.</p>
C.2	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?  Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations  <b>This section can't be completed until all the RAB meetings with the Agency Plan on the agenda have taken place, and those notes and responses compiled. Available mid/late October, 2024.</b></p>
C.3	<p><b>Certification by State or Local Officials.</b></p> <p>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p><b>Required Submission for HUD FO Review.</b></p> <p>(a) Did the public challenge any elements of the Plan?  Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p> <p><b>This section can't be completed until all Public Comments have been received, and those notes and responses compiled. Available mid/late October, 2024.</b></p>
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>
D.1	<p><b>Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p>

**Form identification:** WI002-Housing Authority of the City of Milwaukee form HUD-50075-5Y (Form ID - 793) printed by Willie Hines, Jr in HUD Secure Systems/Public Housing Portal at 07/26/2024 12:16AM EST



**B.2.**  
**Goals and**  
**Objectives**

## B.2. Goals and Objectives.

Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

### **Goal 1: Optimize HACM's organization structure, processes, and procedures to attain resiliency and long-term sustainability.**

Objectives:

- a. Optimize use of the Yardi Software system, including RentCafe portals for applicants, residents/participants, and landlords. In 2025, begin full enterprise-wide use of Yardi for financial accounting data in addition to housing data. Maximize the best use of Yardi software and utilize Yardi reporting tools for monitoring and analysis, and to improve efficiency and effectiveness of performance.
- b. Document policies and procedures via use of standard operating procedures in all departments to assist with training and onboarding new staff, to ensure consistency in processes across all staff, and to ensure data integrity and quality control.
- c. Create a supportive learning culture that prioritizes staff training and development. Use Yardi's Aspire system (HACM University) to develop an effective staff onboarding, training, and continuous education program to ensure staff are trained so that they have the skillsets and knowledge to effectively accomplish their job duties. Invest in HACM staff by encouraging ongoing staff development.
- d. Identify and implement additional ways to leverage technology, as well as staff knowledge and experience, and streamline processes when possible to increase efficiency, effectiveness, and resident, participant, and staff satisfaction.
- e. In HACM's Performance Management System, supervisors annually review and revise to ensure clear accountability goals and standards have been established that are integrated into every employee's performance management review.
- f. Continue to perform succession planning as needed.

### **Goal 2: Maintain optimal occupancy rates for HACM's public and affordable housing developments and improve PHAS score for Public Housing to improve HACM back to a standard performer, and eventually as a high performer.**

Objectives:

- a. Use data and have effective communication with property management to ensure appropriate and timely wait list pulls to ensure sufficient numbers of selected applicants when needed (for public housing wait list, low income housing tax credit wait list, and project-based voucher wait lists).

- b. Streamline processes and use electronic portals when possible to reduce the time to process an applicant.
- c. In RAD/PBV properties, improve communication and coordination between the property management division, Project-based voucher division, and the LIHTC compliance division to streamline processes and communications between these departments for both applicant initial eligibility and for annual reexamination.
- d. Continue to use the “turn team” to ensure efficient turnaround of a vacant unit, with a long-term goal of reducing unit turnaround time from move-out to signing of a lease to between 20 and 25 days.
- e. Ensure that our greatest resource (affordable housing) is used to the greatest extent possible by maximizing our occupancy rates, with a long-term goal of achieving 97-98% occupancy.
- f. Ensure that both emergency and regular work orders are completed in a timely manner to the extent possible, and if late, document the reason it was late as well as actions taken to mitigate the issue.

**Goal 3: Maintain optimal utilization rate for the Housing Choice Voucher program within the funding that is available from HUD and ensure all policies and procedures have been updated to ensure that the voucher program assists applicants/participants to the greatest extent feasible. Also improve SEMAP scores to return from a troubled status to a standard performer, and eventually to high performer status.**

Objectives:

- a. Continue to implement required actions in the HUD Quality Assurance Division (QAD) Corrective Action Plan regarding Financial Management Review, Management and Operations Review, and Family Self-Sufficiency, including but not limited to:
  - 100% Financial transaction review by independent audit firm of all voucher-related financial transactions for the period 2017 to 2022.
  - 100% review of all participant file review by a third-party to ensure appropriate documentation of adjusted income calculation, as well as calculation of tenant portion of rent and Housing Assistance Payment (HAP).
  - Review and correction of 100% of participants’ information and FSS escrow calculations who are enrolled in the Family Self-Sufficiency (FSS) program. These corrections are necessary due to the conversion errors that arose during the conversion from VisualHomes software to Yardi software, and require voiding and re-entering all 50058s from FSS enrollment forward.

- Contract with a third-party contractor to manage and operate the entire Housing Choice Voucher program. HACM has issued the RFP and will soon make a recommendation to the HACM Board of Commissioners.
- b. Continue to implement required actions in the HUD Milwaukee Field Office Corrective Action Plan for SEMAP, including but not limited to:
- Develop an updated revised Standard Operating Procedure related to SEMAP Quality Control.
  - Ensuring appropriate documentation of quality control reviews and appropriate follow-up for wait list selection
  - Ensuring appropriate documentation of quality control reviews and appropriate follow-up for determining adjusted income
  - Ensuring appropriate documentation of quality control reviews of inspections and of inspection enforcement (for failed inspections) and appropriate follow-up
  - Ensuring appropriate documentation that biannual/annual inspections are being conducted timely
  - Reviewing and improving briefing packet material, including materials related to Expanding Housing Opportunities
- c. Work in collaboration with the selected contractor to effectively transition the voucher program from HACM to the vendor selected to manage and operate the program, while continuing good communication and seamless transition for participants.
- d. By tracking financial data and monitoring estimates via the HUD Two-Year Tool, ensure that the voucher program maximizes the utilization rate to ensure available funding for Housing Assistance Payments (HAP) is spent to the greatest extent possible, without going into a shortfall position.
- e. If in a shortfall position, take all shortfall prevention actions to minimize utilization of funds, such as halting issuance of new vouchers, as required by HUD and QAD.
- f. Ensure that recertifications and inspections are done on a timely basis and carefully monitor any that are late and follow-up on them.
- g. Work in close collaboration and ongoing communication with property managers in developments that have Project-based vouchers (PBVs)---both HACM as well as privately-owned buildings that have HACM PBV units-- to ensure a high occupancy rate in PBV units.

**Goal 4: Enhance housing quality, safety and security, and resident quality of life, through staff training, accountability, collaboration with partners, resident engagement, and strong customer service.**

Objectives:

- a. **Safety and Security:** To the extent possible, improve safety and security at HACM housing developments by continuing the following strategies:
- HACM Public Safety department will work with local law enforcement agencies to facilitate information-sharing and coordination. Public safety will also work with residents to facilitate information-sharing on crime issues in our developments.
  - Use of "hot spot saturation" patrols where resources are directed to individual developments or locations that have shown through data to have an increase in reported incidents. Hot Spot Deployment is based on the availability of resources, when patrols are unobligated elsewhere. Public Safety Specialists, when not on calls or other obligated tasks, will post at the respective identified Hot Spot and conduct tours at the location for, but not limited to, the following: (1) parking violations; (2) unauthorized persons; (3) loitering or trespassing; (4) criminal activity.
  - When the budget allows, HACM has partnered with third-party security service providers to provide coverage during selected hours at our most incident-challenged developments. The addition of these contracted partners adds an extra layer of presence and protection for the identified developments.
  - Increase the number and improve the quality of existing security cameras in housing developments. When funding is available, replace older cameras or install new camera locations using the newer camera system that has been installed in several public housing developments. The system uses a cloud-based security surveillance camera system and the cameras can provide a 360-degree coverage area.
  - When appropriate, work with the Milwaukee Police Department to facilitate a Crime Prevention through Environmental Design (CPTED) review at a development to look for ways to reduce risk of crimes at the development (e.g., via lighting, camera locations, etc.)
- b. **Customer Service and Resident Engagement:** Work as a unified team as opposed to separate divisions/departments, and provide the highest level of customer service for our clients (our applicants, residents, participants, and landlords).
- Follow regulations, but in setting department policies, look for opportunities to streamline processes or procedures as much as possible to simplify the process for the customer.
  - Through Human Resources and HACM University, provide ongoing customer service training for all staff that work with clients. All clients will be treated professionally, with honesty, dignity and respect. Staff will use effective communication skills with clients including: clear and concise communication; active listening; and problem solving (if needed).
  - Determine the best methods to communicate with residents in ways they prefer to get information (text, mail, phone, etc.) and maximize use of those methods when possible.



- Continue to update and distribute information that is useful for residents, such as Contact Sheets (who to contact for what), Frequently Asked Questions, and other helpful information, and ensure information on the website is up-to-date.
- Work with HACM's Resident Liaison team to build relationships and ensure good communication with HACM's residents and their elected Resident Organizations. The Resident Liaison team supports the resident organizations and individual residents by providing technical assistance, conflict resolution, and other community resources when possible, and working to help support good communication between divisions of HACM (e.g., property management, rent assistance, etc.) and our residents.

**Goal 5: Preserve and improve existing affordable housing resources and opportunities, by implementing portfolio repositioning tools such as the Rental Assistance Demonstration program (RAD), Section 18 disposition, and other programs, when possible.**

Objectives:

- a. Ensure the long-term viability of affordable and subsidized housing by evaluating and analyzing the various HUD tools/strategies to reposition older public housing developments (such as RAD, Section 18 disposition through preservation with project-based vouchers, homeownership, or disposition in partnership with nonprofit organizations) .
- b. If planning for any specific development begins to move forward, initiate required consultations with both residents and with public officials to provide information and solicit feedback.
- c. As opportunities arise, apply for financing such as low-income housing tax credits (LIHTC) to fund long-term capital needs necessary to perform a transformation such as RAD.
- d. When possible, use the general partner purchase option for the general partner (HACM) to purchase a LIHTC property back from the investors after 15 years to ensure it can be sustained as affordable housing. Evaluate capital needs during this extended use period and apply for a second low income housing tax credit if needed to refresh and provide capital improvements to maintain the quality of the building.
- e. As possible and when financing is available, continue to enhance mixed income developments such as Westlawn Gardens by completing the remaining market rate housing units (both market rental and homeownership). Look for opportunities when transforming other developments for potential mixed income or mixed-use possibilities.
- f. If opportunities arise, HACM may utilize its excess ACC units – (under the Faircloth Limit of around 1,000 units), in joint venture with private developers or solely for other private developers intending to create new affordable housing units. If those opportunities arise, HACM will follow applicable regulations in the utilization of these excess ACC authority.

- g. Evaluate and consider securing capital through the Capital Fund Financing Program (CFFP) if there is a situation where capital needs are urgent and a conversion to RAD or Section 18 disposition is not yet financially feasible.

**Goal 6: Continue to implement programming and collaborations to achieve self-sufficiency for residents.**

Objectives:

- a. A housing authority can't do it alone---Develop and expand partnerships and collaborations with other organizations that can provide needed supportive services to HACM's residents.
- b. To the extent possible, work with partners to improve access to services or other resources that residents need to improve their lives and the lives of their children.
- c. Continue and sustain successful economic self-sufficiency programming, including but not limited to, HUD's Family Self Sufficiency program, the financial education/asset building program called Make Your Money Talk and use of Section 8(y) vouchers for homeownership.
- d. Identify opportunities for grants or other funding for services to improve resident self-sufficiency or quality of life, and apply for funding when available.
- e. Foster an environment of work, wellness, education, and community service in all HACM developments.

**B.3**  
**Progress**  
**Report**

### B.3. Progress Report.

Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

#### 2.1 Implement Rental Assistance Demonstration (RAD) whenever feasible.

##### Objectives by year:

2020

- Complete rehabilitation of Holton Terrace -120 units
- Start rehabilitation of Merrill Park – 120 units
- Complete RAD financial closing and start rehabilitation of Becher Court – 120 units
- Submit 9% Tax Credit Application for Scattered Sites: Cherry Court and Highland Homes AMP.
- Continue Revitalization and Preservation Planning for Hillside AMP.

2021

- Complete rehabilitation of Merrill Park and Becher Court projects by 12/31/21
- Submit 4% tax credit with State credits for Highland Park
- Submit 4% tax credit with State credits for Carver Park – 122 units
- Submit 9% Tax Credit Application for the Phase 1 of Hillside RAD conversion

2022

- Estimated RAD Closing for Townhomes at Carver Park in July 2022

2023

- Continue predevelopment activities for the Hillside Terrace revitalization

2024

- Continue predevelopment activities and explore financing plan options for Hillside Terrace

##### 2020 Progress Report:

HACM continues to implement portfolio repositioning through the RAD program.

- Westlawn Renaissance III, Phase 2B of the Westlawn Development/CNI plan, was completed in April 2020 and occupied in July 2020 (94 units).
- Holton Terrace (2018 9% Low Income Housing Tax Credit award) estimated completion December 2020 (120 units)
- Merrill Park (120 units) was awarded a 2019 9% Low Income Housing Tax Credit award, had a financial closing in December 2019, and has an estimated completion of December 2021.
- Becher Court (120 units) was a 2019 9% Low income housing tax credit award, had its financial closing in June 2020, with an estimated completion in December 2021.
- Westlawn Renaissance VI (138 units) had its financial closing in April 2020 and an estimated completion in December 2021.

- Westlawn Renaissance IV (60 units) is pending closing in October 2020  
The team is evaluating the financing structure for the remaining CHAPs and potential applications for the remaining public housing portfolio.

### **2021 Progress Report:**

HACM continues to implement portfolio repositioning through the RAD program:

- Holton Terrace (120 units): All apartments (regular and ADA-accessible) have been completed in early 2021 and majority of the units are leased as of July 2021. Both elevators have been replaced. Community areas are being rehabbed and boiler system will be replaced, and this work should be done by September 2021.
- Merrill Park (120 units): All ADA-accessible apartments have been completed as of July 2021. Continue to work on the remaining regular apartments through 2021, including relocation of original Merrill Park residents to their new rehabbed unit. Construction is currently scheduled to be completed by end of 2021.
- Becher Terrace (120 units): Continue to work on the remaining regular and ADA-accessible apartments through 2021, including relocation of original Becher Terrace residents to their new rehabbed unit. Construction is currently scheduled to be completed by end of 2021
- HACM submitted a 9% Low income housing tax credit (LIHTC) application for Townhomes at Carver Park (122 units) in late 2020 and received an award from WHEDA in April 2021. We will submit a RAD financing plan by November 2021 with the estimated RAD closing for Carver Park in March 2022.

### **2022 Progress Report:**

HACM continues to implement portfolio repositioning to include the RAD Program.

- Westlawn Renaissance V RAD conversion closed as of 7/6/2022 with 3 RAD Units
- Townhomes at Carver Park RAD conversion closed 7/20/2022 with 51 RAD Units
- Westlawn Renaissance VII RAD Conversion closed 7/27/2022 with 73 RAD Units and 20 Section 18 PBV Units.

### **2023 Progress Report:**

HACM continues to implement portfolio repositioning to include the RAD Program.

- Continuing to evaluate redevelopment options for Hillside Terrace Revitalization

### **2024 Progress Report:**

HACM continues to implement portfolio repositioning through the RAD program as follows:

- HACM completed Westlawn Renaissance V and Westlawn Renaissance VII construction, which completed the construction of replacement units (RAD/PBV units) at Westlawn.

- HACM continues predevelopment activities and options for Hillside Terrace Revitalization via RAD.
- HACM continues to look for other possible RAD opportunities for existing public housing developments.

## **2.2 Complete the implementation of Westlawn Choice Neighborhood Initiatives (CNI) Grant.**

### **Objectives by year:**

2020

- Close and start construction of Phase 4B – 138 units of townhomes (136 RAD project-based voucher replacement units and 2 units LIHTC-only).
- Close and start construction of Phase 3 - 60 units supportive housing (60 units in two multifamily with 30 of the units being supportive housing for youth aging out of foster care).
- Apply for 4% tax credit for Phase 4C -62 units (breakout to be determined)
- People: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.
- Education: Continue to work with Milwaukee Public Schools and Carmen to implement educational strategies towards increasing the percentage of children in neighborhood schools.
- Neighborhood: Continue to implement the Critical Community Improvements activities, including the façade improvement fund, the revolving business loan fund, and the place-making activities.

2021

- People: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.
- Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
- Neighborhood: Continue to implement the Critical Community Improvements activities, including the façade improvement fund, the revolving business loan fund, and the place-making activities.

2022

- Complete CNI/RAD financial closing and start construction of Phase 4A – 79 units (breakout to be determined)
- Complete CNI/RAD financial closing and start construction of Phase 4C -62 units (breakout to be determined)
- Complete CNI/RAD financial closing and construct commercial/retail amenities – one project
- Complete CNI/RAD financial closing and start construction of town-house market rate housing

- People: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.
- Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
- Neighborhood: Continue to implement the Critical Community Improvements activities, including the façade improvement fund, the revolving business loan fund, and the place-making activities.

#### 2023

- Complete Construction of WRV in December 2023.
- Complete CNI Financial Closeout with HUD September 2023
- People: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.
- Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
- Neighborhood: Complete the Critical Community Improvement activities for the Westlawn CNI.

#### 2024

- Complete Construction of WRVII in March 2024
- Work with neighborhood partners to promote and transition the success of Choice Neighborhood, People and Education initiatives long-term.
- Complete relocation of Westlawn West Residents back to Westlawn Gardens
- Evaluate financing options for future CNI affordable housing development and homeownership opportunities

#### **2020 Progress Report:**

The Westlawn CNI Transformation Plan continues to be implemented.

- Phase 2B (Westlawn Renaissance III with 94 units total) had the construction completed in late 2019 and was fully leased by August/September 2020.
- Phase 4B (Westlawn Renaissance VI with 138 units total) had a financial closing in April 2020 and construction began during the summer with the first units estimated to be completed by December 2020.
- Phase 3 (Westlawn Renaissance IV with 60 units total, including 30 supportive housing for youth aging out of foster care) is expected to have a financial close in October 2020 with construction to begin in the spring.
- Other redevelopment continues as funding is identified.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return).

- Education: We continue to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Critical Community Improvements continue, including: At least \$225,000 in loans from the Small Business Revolving Loan fund that is administered by WWBIC for businesses expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 76<sup>th</sup> Street Plaza and other businesses; and planning work continues for Placemaking projects.

**2021 Progress Report**

- HACM submitted a Housing Plan revision to redistribute the replacement housing in Phase 4A and 4C.
- Began leasing Westlawn Renaissance VI (138 units) in May 2021 and construction and leasing will continue through year end
- Westlawn Renaissance IV (60 units, including 30 supportive housing units for youth aging out of foster care) began construction in Spring 2021 and is estimated to be completed in Spring 2022
- The permitting process has begun for Westlawn Gardens Homeownership units
- HACM received a 9% LIHTC allocation for Westlawn Renaissance V (Phase 4A). Construction will begin in Spring 2022.
- Received a 4% LIHTC allocation for Westlawn Renaissance VII (Phase 4B). Construction will begin in Spring 2022.
- Other redevelopment continues as funding is identified.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return).
- Education: We continue to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Critical Community Improvements continue, including: At least \$500,000 in loans from the Small Business Revolving Loan fund that is administered by WWBIC for businesses expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 76<sup>th</sup> Street Plaza and other businesses; and implementation work on the Placemaking projects.

- **Progress Report**
- Completed construction of WRIV Beech and Chestnut @ Westlawn Gardens in April 2022.
- Completed construction of WRVI, 138 townhome units in June 2022.
- Westlawn Renaissance V (Phase 4A) a 44 unit midrise closed as of 7/6/2022. Unit mix includes:

Unit Type	Bedroom Size	Number of Units
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PBV – designation for youth aging out of foster care	1	28
Tax Credit Only	1	3
Tax Credit Only	2	10
RAD PBV/Tax Credit	2	3

Construction is set to begin in July 2022 with project competition in December 2023.

- Westlawn Renaissance VII (Phase 4C) closed 7/27/2022. Unit mix includes:

<b>Unit Type</b>	<b>Bedroom Size</b>	<b>Number of Units</b>
RAD PBV/Tax Credit	1	7
RAD PBV/Tax Credit	2	16
RAD PBV/Tax Credit	3	40
RAD PBV/Tax Credit	4	10
Regular PBV (Deminimis reduction from RAD Units)	2	20
Tax Credit Only	1	1
Tax Credit Only	3	3
<b>Total Units</b>		<b>97</b>

- Secured American Recovery Plan funding from the City and State amounting to \$15mm to fill in the financing gap for the WR V and WR VII project, including additional funding for the construction of non-HUD funded rental and home ownership housing as per CNI Housing Plan.
- Construction is set to begin in July 2022 and be complete by March 2024.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return) as well as assisting residents that want to work with employment opportunities.
- Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Work to improve the neighborhood development continued as follows:
  - HACM/CNI joined with WWBIC and PNC Bank to launch Black Business Boost, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Since its launch in October 2022, over 600 applications have been received.
  - The CNI exterior revitalization grant program awarded a \$50,000 grant to the owners of Silver Spring Mall, located directly across Silver Spring Drive. Combat Corner, which was awarded a \$25,000 grant during the summer, has begun improvements to its facade. Work is moving forward on the Havenwoods Plaza, which was awarded a \$50,000 grant. Additional applications for approximately \$85,000 are under review.
  - The CNI loan fund program made several awards to businesses relocating into the CNI neighborhood or expanding in the CNI neighborhood, including:

- A \$100,000 loan to TMP Aeronautics, a new business that established itself in the CNI neighborhood and that is a supplier to the aerospace industry.
- A \$250,000 loan to Bert & Tom, LLC to support relocation of a beer distribution business to an empty manufacturing space and plans for a beer garden/tap room with expansion to include a restaurant and commercial kitchen. We are also considering an exterior revitalization grant to support the project.
- A \$250,000 loan to CRS Enterprises, LLC to purchase one of Milwaukee's oldest African American owned & operated social service organizations to continue those services located in the CNI neighborhood.
- Designs have been completed for the Carmen Playfield renovation, which will include the Tuj Lub courts that are part of the CNI CCI plan. The renovation is scheduled to begin in May 2022.
- The Best Babies Zone healthy birth outcomes initiative, facilitated by CNI and funded by a grant from the Greater Milwaukee Foundation, started the year with strategic planning and launched activities with a virtual family self-care event.
- The CNI supported Northwest Fresh Food Access Council continued to meet, strategize and coordinated efforts to increase access to fresh food in the neighborhood. This included coordination to utilize the Browning Elementary greenhouse to grow over 2,000 vegetable seedlings to be transplanted into community gardens this summer by residents and the Teens Grow Greens youth leadership program.
- One of the main goals of the program is coming to fruition as a Sentry Foods grocery store is in the process of locating in the strip mall across the street from Westlawn Gardens, in the spot formerly filled by the Meat Market. This will finally bring a full-service grocery store to the neighborhood.

### **2023 Progress Report**

- Construction of WR V and WR VII are on track for completion this year.
- Design and construction of 10 units non-HUD funded housing units is expected this year.
- The CNI grant will be completed in September 2023 and HACM is on track to fully expend the grant. Housing construction for final phases continues.
  - People: Case management of residents continues with two case managers currently assisting target residents. This includes assistance in residents wishing to return as the final replacement units are completed in 2023, as well as those wanting assistance on finding employment/job search.
  - Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
  - Neighborhood: Work to improve the neighborhood development continued as follows:
- Business Loan Program: Part of the HACM's Critical Community Improvements Plan for CNI, the Business Loan Program is a joint initiative with Wisconsin Women's Business

Initiative Corporation (WWBIC). Under Milwaukee's Choice Neighborhoods Business Loan program, \$1 million in Choice Neighborhoods CCI funds was set aside for a revolving fund, which was matched with \$500,000 from WWBIC. This two-thirds/one-third split enabled the partnership to offer its loans at favorable rates, which further incentivized businesses to set up shop in the neighborhood. To date, the Business Loan Program has helped eight businesses either launch, expand or relocate into the neighborhood, created/retained 58 jobs, and spurred exponential growth and largescale economic development throughout the community.

- Façade Program: CNI also partnered with Milwaukee's Department of City Development to fund exterior façade revitalization efforts in the CNI neighborhood. A number of façade grants have been awarded under the program to improve the physical appearance of the neighborhood and assist local businesses with needed exterior physical improvements.
- Black Business Boost: HACM/CNI continues to partner with WWBIC and PNC Bank on their Black Business Boost program, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Black Business Boost is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital: Credit Recovery and Support; Technical Assistance and Training; Acceleration and Incubation; and Equity and Loan Support.
- Other programs: CNI has also partnered in a number of other neighborhood programs, including the Best Baby Zone healthy birth outcomes initiative and the Northwest Fresh Food Access Council.

## 2024 Progress Report

- Construction of Westlawn Renaissance V (the 44 unit midrise also known as Maple) was completed and ready for occupancy in December 2023.
- Construction of Westlawn Renaissance VII (79 townhomes units ) was completed in Spring 2024 and ready for occupancy.
- Since WL Renaissance V and VII completed the Choice Neighborhood replacement units for the grant, relocation of the last Westlawn residents who wanted to come back to Westlawn replacement units has been completed. Two households with higher incomes will each be offered one of the market rate units.
- Started construction of 11 market rate rental units in April 2024, funded with State ARPA funding. This is the first phase of market rate units.
- It is anticipated that HACM will complete the CNI grant in the fall of 2024. All housing and people funds have been expended, and we are on track to complete and fully expend neighborhood (Critical Community Improvements) funding as well.
- After completion, HACM and HUD will do final close-out of the CNI grant but will continue to report to HUD on activities such as completion of market rate housing. HACM is on track to fully expend the grant.

- **Business Loan Program:** Part of the HACM’s Critical Community Improvements Plan for CNI, the Business Loan Program is a joint initiative with Wisconsin Women’s Business Initiative Corporation (WWBIC). Under Milwaukee’s Choice Neighborhoods Business Loan program, \$1 million in Choice Neighborhoods CCI funds was set aside for a revolving fund, which was matched with \$500,000 from WWBIC. This two-thirds/one-third split enabled the partnership to offer its loans at favorable rates, which further incentivized businesses to set up shop in the neighborhood. To date, the Business Loan Program has helped eight businesses either launch, expand or relocate into the neighborhood, created/retained 58 jobs, and spurred exponential growth and large scale economic development throughout the community.
- **Façade Program:** CNI also partnered with Milwaukee’s Department of City Development to fund exterior façade revitalization efforts in the CNI neighborhood. A number of façade grants have been awarded under the program to improve the physical appearance of the neighborhood and assist local businesses with needed exterior physical improvements.
- On May 24, 2024, the Havenwoods Taproom & Beer Garden had their grand opening. The project is supported by CNI loans and facade grants to both the business owner and the property owner, and it includes redeveloping formerly empty industrial building site into a craft beer taproom, beer garden with woods walk, and food trucks. Havenwoods Neighborhood Partnership has scheduled its weekly summer music series at the beer garden beginning July 11, 2024.
- Another CNI facade project, Havenwoods Plaza located directly across the street from Westlawn Gardens, has reached capacity in 2024 on its 5 retail bays, with We Care Pharmacy, Tasty's Deli, and the Asian Market (which is renting 3 retail bays).
- **Black Business Boost:** HACM/CNI continues to partner with WWBIC and PNC Bank on their Black Business Boost program, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Black Business Boost is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital: Credit Recovery and Support; Technical Assistance and Training; Acceleration and Incubation; and Equity and Loan Support.
- **Other programs:** CNI has also partnered in a number of other neighborhood programs, including the Best Baby Zone healthy birth outcomes initiative, the Northwest Fresh Food Access Council, and a digital equity initiative

**2.3 Implement portfolio repositioning under Section 18 Disposition Rules, Rental Assistance Demonstration Program (RAD) and other HUD repositioning tools whenever feasible.**

**Objectives by year:**

2020

- Continue to work with Neighborhood Stabilization Program (NSP) utilizing NSP sales and proceeds to acquire/rehab properties (HACM owned/foreclosed) in conjunction with the portfolio repositioning activities.

2021

- Continue to assess and evaluate operational needs for repositioning with ongoing opportunity.

2022

- Reposition AMP WI002000046 Townhomes at Carver Park via RAD Conversion

2023

- Evaluate avenues for potential repositioning of other AMPs:

AMP WI002000013 Arlington Court

AMP WI002000011 College Court

AMP WI002000001 Hillside Terrace

AMP WI002000019 Lincoln Court

AMP WI002000015 Locust Court

AMP WI002000017 Mitchell Court

AMP WI002000007 Parklawn

AMP WI002000062 Riverview

2024

- Continue to evaluate avenues for potential repositioning of other AMPs via use of the Rental Assistance Demonstration Program (RAD) or the Section 18 Disposition program (through preservation with project-based vouchers, homeownership, or disposition in partnership with nonprofit organizations):

AMP WI002000013 Arlington Court

AMP WI002000011 College Court

AMP WI002000001 Hillside Terrace

AMP WI002000019 Lincoln Court

AMP WI002000015 Locust Court

AMP WI002000017 Mitchell Court

AMP WI002000007 Parklawn

AMP WI002000062 Riverview

AMP WI002000063 Cherry Court Scattered Sites

AMP WI002000060 Highland Homes Scattered Sites  
AMP WI002000010 Milwaukee Scattered Sites  
AMP WI002000016 North/West Scattered Sites  
AMP WI002000061 Southside Scattered Sites

**2020 Progress Report:**

Ongoing. We continue to use RAD as a repositioning tool for Westlawn Gardens, Holton Terrace, Merrill Park and Becher Court. We will continue to evaluate the potential of using Section 18 disposition as a possible portfolio repositioning tool for scattered sites, however we have not yet completed our evaluation. It is anticipated that this will continue into 2021.

**2021 Progress Report:**

HACM continues to evaluate financial feasibility and resident impact for Section 18 repositioning. All 2020 goals will be evaluated for possible implementation in 2022 and beyond. At the time recommendations are made, HACM will follow Section 18 guidance on resident and local government consultation.

**2022 Progress Report:**

HACM continues to evaluate financial feasibility, resident impact and opportunity to reposition the public housing portfolio. Due to the COVID19 Pandemic, much of the focus over the last several years has been on stabilizing operations and providing residents with the highest quality of customer service.

**2023 Progress Report:**

HACM continues to evaluate financial feasibility, resident impact and opportunity to reposition the public housing portfolio. During 2023, HACM was focused on stabilizing operations and providing residents with the highest quality of customer service, and on the completion of Westlawn Gardens CNI.

**2024 Progress Report:**

HACM continues to evaluate financial feasibility, resident impact and opportunity to reposition the public housing portfolio. During 2024, HACM was focused on stabilizing operations and providing residents with the highest quality of customer service, and on the completion of Westlawn Gardens CNI.

**2.4 Utilize excess units on Annual Contribution Contract (ACC) Faircloth Limit.** Consistent with HACM’s plan to increase affordable housing units, HACM may utilize its excess ACC units – (under the Fair Cloth Limit) of around 1,000 units, in joint venture with private developers or solely for other private developers intending to create new affordable housing units. HACM will follow applicable regulations in the utilization of these excess ACC authority.

**Objectives by year:**

2020

- Issue solicitation for Preferred Development Partner.

- Determine ACC allocation availability for each year. Could be coupled with PBV for financial feasibility consideration for new projects.

2021

- Collaborate with counties around Milwaukee for possible partnership on Supportive Housing projects that ACC subsidy might be able to work.
- Consider and evaluate project acquisitions [existing projects] where ACC subsidy can work.

2022

- Consider issuing a solicitation for use of excess ACC capacity.

2023

- Consider issuing a solicitation for use of excess ACC capacity.

2024

- Consider issuing a solicitation for use of excess ACC capacity.

**2020 Progress Report:**

Ongoing. We will not issue a solicitation for use of excess ACC units during 2020. We will consider utilizing excess unit capacity for public housing as a tool for potential development by other developers in the Near West Side neighborhood.

**2021 Progress Report:**

Ongoing. We may solicit uses for excess ACC units during 2021. We will consider utilizing excess unit capacity for public housing as a tool for potential development by other developers in the Near West Side neighborhood.

**2022 Progress Report:**

Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

**2023 Progress Report:**

Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

**2024 Progress Report:**

Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

**2.5 Maximize Section 8 voucher utilization rate.**

**Objectives by year:**

2020

- Issue solicitation for PBV allocation.
- Create and operationalize organization, system and process for a dedicated PBV administration unit under the Rental Assistance Program.

- Implement effective reporting and matrix reporting tools to property track leasing performance.
- Implement changes in the VMS reporting responsibilities to enhance accountability.

2021

- Effectively utilize Yardi reporting tools and HUD's forecasting tool.
- Increase landlord engagement

2022

- Under HUD oversight, work to implement a plan to improve HAP utilization. See detailed plan under 2021 Progress report below.
  - For the Housing Choice Voucher program, current utilization is 68% and our goal is to eventually improve it to 90%.
  - For the Project-based Voucher program, the current utilization is 87% and our goal is to eventually improve it to 98%.
  - HACM's goal is to increase the number of utilized vouchers for their HCV program to 6,487 by the end of December 2022, which is an increase in the total number of utilized vouchers in 2022 of 930 housed families

2023

- HACM's goal is to increase the number of utilized vouchers for their HCV program to 6,941 by December 2023.

2024

- HACM will implement required actions in its Corrective Action Plan regarding the HUD Field Office Site Monitoring Report.
- HACM will implement required actions in its Corrective Action Plan regarding the HUD Quality Assurance Division (QAD) Financial Management Review and Management & Operations Review (FMR/MOR).
- HACM will implement required actions in its Corrective Action Plan regarding the HUD QAD report on Family Self Sufficiency.
- HACM will implement all required actions in its Corrective Action Plan regarding the SEMAP rating for the rent assistance program.

**2020 Progress Report:**

Ongoing. We will consider issuing a solicitation for Project-based vouchers (PBVs) in late 2020 as a tool to assist in replacement units and/or other affordable units for potential development by other developers in the Near West Side neighborhood.

Additionally, we have created a separate PBV administrative team within the Rent Assistance program department at HACM. This team is working to manage the separate PBV wait lists and to efficiently manage the PBV program. They are working to improve the tools in YARDI used to track leasing performance at PBV developments.

The Soldiers Home project is estimated to be completed in 2021, and the units have VASH vouchers allocated to it.

**2021 Progress Report:**



Below are steps that HACM's Rent Assistance program has established and will continue to work on during 2021 and 2022 to process more efficiently and to increase lease-up percentages:

- Hiring and redeployment of staff, including:
- Hired 5 Certification Specialists. These new hires include replacement of team members who have voluntarily/not voluntarily left the organization. This team has resumed working in office rather than remotely.
- A team of four workers has been assigned to focus on New Admissions and voucher issuance. One of these Team members will be the appointed liaison for the Emergency Housing Voucher deployment.
- A team of seven workers has been assigned to focus on Annual reexaminations, Adjustments and PIC data clean-up.
- A team of 2 Lease and Contract Specialists are conducting follow-up calls to participants with issued vouchers but not leased-up.
- This year the RAD/Project-based Voucher team has grown from a team of 4 to a team of 6 individuals. The added 2 team members are Clerical Assistants. This team has resumed working in the office as opposed to remotely.
- A team of 2 is dedicated to the Waiting list mailings and processing background check responses.
- Implement changes to policy and/or procedures to improve efficiency and effectiveness, including:
- All participants with late Annual Re-examinations are being contacted via phone to be completed. HUD documents that are required to be signed and not included in the waivers are being emailed/mailed to complete and return to the program. Measurable goals have been established for this team.
- All the RAD/Project Based Developments (HACM Owned and Partnering Agencies) have been all centralized with the RAD team.
- The RAD team has scheduled on-site visits to housing developments to complete annual reexams and obtain signed leases.
- Virtual Inspections are currently being conducted and field inspections will resume next month (as needed for those that are being challenged with technology).
- The City Department of Neighborhood Services has been hired to assist with annual inspections that were waived last year and must be completed by 12/31/2021.
- The rent reasonableness unit proximity review has expanded from 1 mile up to 5 miles to located acceptable comparables and minimize the time spent reviewing.
- Landlords interested in participating in the program by listing their available units for program participants, are now listed on the HACM website. This list is updated every Friday.
- Informal Hearings are being conducted virtually.
- Background check reports have been reduced to meet the minimum HUD requirements. This has helped to minimize the review time for each applicant to be approved. In turn, the applicant is processed for eligibility and voucher issuance.
- A Housing Navigator has been hired and is meeting weekly every Wednesday with VASH Case Workers to bridge the communication gap between the VA and RAP and increase VASH Voucher lease-up.
- Currently under review and Yardi testing is the implantation of Small Area FMR's (SAFMRs). We want to ensure Yardi set-up is correct and accurate Payment Standards are being selected according to the established zip codes.

- Hired a PIC coach to assist in the review of our data and reporting. This includes the Yardi conversion data clean-up for accurate VMS/PIC reporting.
- A data sharing MOU was established with the Opportunity Milwaukee Mobility team to recruit eligible families for this program and assist in locating a unit. This will help house families more rapidly and increase lease-up.
- Implemented a limited homeless preference for the Housing Choice Voucher program.
- Use of HUD's forecasting tool and HCV dashboard to monitor and report on progress towards goals.

### **2022 Progress Report:**

**Leasing Plan:** HACM and CVR Associates (a technical advising firm specializing in rent assistance voucher programs) have been working to create a leasing plan through the use of the Two-Year Tool, data analysis, and the Tool of Tools.

This Leasing Plan is for the years 2022 and 2023, with goals for the estimated number of vouchers issued, PBVs leased, manual PUC overrides, Success Rates, Attrition Rates, and Voucher Issuance to HAP Lease Up projections updated for both years. As these actual numbers and percentages are adjusted, the leasing plan will be amended to ensure maximum utilization.

The number of vouchers issued for 2022 will allow the PHA to get to a point of maximum utilization in early 2023. In doing so, it is anticipated that HACM will be able to maintain their utilization by covering their attrition, while being able to reduce their HAP reserves to under 3%. It will be extremely important for HACM to monitor the key indicators as it relates to the Two-Year Tool and make adjustments to the number of vouchers issued moving forward to continue to maximize their utilization.

**Long Term Strategy:** If the leasing projections are met, HACM will likely be issuing vouchers to simply maintain the attrition of their program by July of 2023, while having reduced HAP reserves to 3% by the end of 2023. If these benchmarks are achieved moving into 2024, it is recommended additional strategies be implemented:

- Portability – begin administering vouchers to develop new revenue streams.
- Reassign staff – reassign eligibility staff to address long-term operational needs related to Recertifications, Interims, Unit Transfers, etc.
- Operationally – HACM's operations, budget, and funding will be simplified and prepared to address voucher attrition through leasing monthly as opposed to trying to catch up.
- Waiting list – Probably could be closed in 2023 once there are 3,000 remaining names on the HCV waiting list, as it should last for at least two years, presuming a 50% success rate for applications

### **2023 Progress Report:**

In late 2022, HACM's Rent Assistance Program received two detailed on-site monitoring reviews:

- **HUD Field Office Review:** The first monitoring visit in October 2022 was from the Milwaukee HUD Field Office staff to follow up on progress made on actions to improve

utilization and other concerns. HACM received a report on this monitoring visit on 12/29/2022.

While the HUD field office noted several improvements that had been made since their last review in 2021, they also found substantial non-compliance issues related to financial/accounting as well as programmatic areas. In total, there were 31 findings and 13 concerns in the report which required a corrective action plan from HACM. Some of the major findings from the HUD Field Office review include, but are not limited to:

- **Financial Software:** HACM is not using YARDI to its fullest advantage. The use of the Multiview financial software system for accounting complicates the process of accounting for the voucher program and requires additional steps and difficulty in reconciling both HAP payments and administrative fee expenses.
- **Internal Controls:** Lack of internal controls in the monthly HAP check run as well as in the reconciliation between the HUD Voucher Management System and the HACM accounting General Ledger amounts.
- **Late Recertifications:** A significant number of recertifications were processed late, including many in which HAP payments were made and charged to HAP in the current year for prior year HAP activity.
- **HAP Payments to HACM:** HACM was making HAP payments to itself for voucher participants in the Northlawn, Southlawn, and Berryland developments, rather than using LLCs or another entity. This is not in compliance with requirements of PIH Notice 2017-21.
- **Inaccurate Data in the VMS and PIC Systems:** Data reported to the VMS system and the PIC system have a number of inaccuracies. HACM needs to improve data integrity through using an improved quality control process. VMS reporting was inaccurate in places and needed to be better documented and reconciled.
- **Low HAP Utilization Rates:** HAP utilization rates continue to be low in both the HCV and PBV programs.
- **Processes and Procedures Need Streamlining:** HACM must implement a number of changes to streamline and create more efficient and effective policies and procedures to decrease processing delays that are impacting the utilization rates.
- **Incomplete Documentation in Files to Verify HAP and Tenant Rent:** HACM must improve: (1) compliance with HUD's verification procedures to verify income, assets, etc., including use of the EIV system and other third-party verification; (2) filing and

storage of documentation in client files so that they are readily available; (3) ensure appropriate protection of personally identifiable information.

- Use of Independent Entities and other Contractors: Ensure that independent entities were performing rent reasonableness reviews and inspections at HACM-owned properties. In addition, consider outsourcing other processes to contractors to assist when necessary.

On February 10, 2023, HACM submitted a proposed Corrective Action Plan in writing to HUD regarding all findings and concerns, and work is continuing on the plan at this time. Some major action items being worked on include:

- YARDI Financial Software: Effective January 2023, HACM will be using the full YARDI suite for Section 8 [Financials-HAP and HAP related transaction and Program operations]. This will allow better audit trail and more efficient and reliable reconciliation between Yardi and HUD VMS reporting information.
- Business Process Review: HACM has engaged a YARDI consultant to perform a Business Process Review (BPM) to ensure accurate mapping of data, provide accurate reporting to HUD systems (PIC and VMS), provide a road map to optimize use of YARDI by HACM, and improve HACM's processes
- Section 8 Accountant/Analyst: HACM's Accounting Department has hired this position to focus solely on Section 8 accounting and financial reporting. This Financial & Systems Analyst position will have its top priority as stabilizing the Section 8 financial operations.
- Improved Internal Controls/Segregation of Duties: HACM has already improved internal controls, revised responsibilities to provide better segregation of duties, and made revisions to the departmental organizational structure. In addition, HACM developed a Standard Operating Procedure over Quality control that will be implemented in June 2023.
- Increased Outsourcing Where Needed: In cases where HACM does not have the immediate capacity to address issues or where a contractor brings a specialized knowledge or skill, HACM has begun to outsource services and will continue to outsource as needed. For example, HACM has hired Nan McKay to perform HCV recertifications. This will allow HACM staff to focus on correcting data integrity issues with participants in PIC and VMS and receive some intensive training. HACM will continue to look for opportunities to expand outsourcing where needed, with other potential areas that could include items such as but not limited to: tenant file reviews; SEMAP assessment/quality control reviews; FSS program administration assistance; management and organizational reviews and assessments; etc.
- Staff Training: HACM leadership in the finance and Rent Assistance divisions will be required to complete a series of assigned financial management and HCV

management and financial management courses All trainings will be tracked through Yardi Aspire and HACM's Human Resources system. Trainings will include trainings provided by YARDI on specific tasks or processes in YARDI, HCV/PBV-gearred trainings from HUD Exchange, and other trainings.

- **Quality Assurance Division Review:** The second review was a site visit from the HUD Quality Assurance Division (QAD) in December 2022 and they performed a Financial Management Review (FMR) and a Management and Operations Review (MOR).

Based on concerns raised by the field office on-site monitoring report, the Quality Assurance Division of HUD scheduled an on-site financial management review (FMR) and management and operations review (MOR) in December 2022. The review covered the five-year period from 2017 to 2022. We received the initial report on findings from QAD on April 11, 2023. Some of the major concerns identified by QAD include:

- The HACM HCV financial records and books of account could not be properly and effectively tracked, and lack an audit trail. The use of Multiview for the accounting software system rather than YARDI adds to the complexity in reconciliation between the housing software and the general ledger, as well as to data reported to HUD through VMS and PIC.
- HACM must ensure a forensic audit and reconstruction of the full financial records to determine the true and accurate financial position.
- In addition, there appeared to be disallowed or questioned costs that need to be investigated and/or corrected. For example, HAP payments appeared to be made for a prior year due to a late recertification and were charged inappropriately to HAP expense rather than administrative fee.
- HACM is not properly tracking Family Self-Sufficiency (FSS) escrow amounts and balances. This appears to be related to errors that occurred as part of the conversion from VisualHomes to YARDI in 2019. It has resulted in inaccurate escrow calculations and balances for participants that need to be corrected. There was also a more detailed Corrective Action Plan regarding the FSS program that was issued in May 2023.
- Based on a review of participant files, the files were deemed in poor condition by QAD. Due to documentation potentially missing from the participant file (hard copy file and/or electronic), QAD could not readily ensure the correct calculation of HAP payment and tenant rent amounts from the file. This could potentially result in incorrect HAP payments made.

HACM responded with a proposed Corrective Action Plan (CAP) to QAD on May 18, 2023. The Corrective Action Plan includes two major actions that were required by QAD:

- HACM will engage a financial consultant/independent contractor before end of June 2023 to perform these activities and to determine the correct financial position of the program. The contractor will assist in a reconstruction and forensic audit of the full financial records including full reconciliation between YARDI and the general ledger, determination of the correct UNP and RNP balances, and must ensure any adjustments/changes related to the 100% file review (see next bullet) are appropriately corrected in compliance with HUD regulations.
- As recommended in the Final Corrective Action in MOR-2023-8b, HACM will engage an independent contractor to perform a 100% file review of all new admissions, annual reexaminations and interim reexaminations that occurred during 2022. The contractor will also ensure that YARDI data is accurate and that any corrections are made where appropriate.

#### **2024 Progress Report:**

- **2022 Housing Choice Voucher Monitoring Corrective Action Plan** (*Reviews conducted by HUD's Milwaukee Field Office and the Quality Assurance Division September 19, 2022 to November 18, 2022*)

The HUD Milwaukee Field Office identified 109 corrective action items. Of those, HACM has completed 52. Another 54 are duplicative action items that overlap with the HUD Quality Assurance Division corrective action plan. The HUD Quality Assurance Division will continue monitoring the status of these action items.

Three action items were not completed and will be carried over into the 2023 Section Eight Management Assessment Program Corrective Action Plan.

- As HACM continues to implement the corrective measures, significant strides have been made in strengthening the operational foundation of its Section 8 Housing Choice Voucher program. HACM has:
  - Implemented the full **Yardi financial suite** to combine all programmatic and financial data for the Section 8 program into one integrated software program.
  - Revised and adopted updated **Standard Operating Procedures (SOPs)** for protecting personally identifiable information, processing housing assistance payments, quality control, the Section Eight Management Assessment Program, Voucher Management System reconciliation and reporting, and end of program participation and terminations.
  - Revised and adopted the updated **Accounting and Financial Policies and Procedures Manual**.
  - Launched the **YARDI Aspire training module** to provide job-specific and Housing Choice Voucher program training to staff.

- Increased use of **Independent Entities** to carry out operational activities such as conducting inspections, processing participant selection, establishing project-based voucher contract rents, and determining rent reasonableness.
- Issued a **Request for Proposal** for the operation and management of HACM’s Housing Choice Voucher program
- **Section Eight Management Assessment Program (SEMAP) Corrective Action Plan**  
*(Review conducted by HUD-Milwaukee September 2023 to November 2023 for fiscal year end 2022)*

There were 26 findings, many of which are a continuation of those identified in 2022 by the HUD’s Milwaukee Field Office and HUD’s Quality Assurance Division. As a result, this corrective action plan contains outstanding corrective actions remaining from the onsite monitoring review HUD’s Milwaukee Field Office completed in 2022. HACM will remain in SEMAP troubled status until HACM identifies a suitable vendor to operate its Section 8 program, and that vendor conducts a 100% participant file review for the 2017 - 2022 period, as required by the corrective action plan. HACM anticipates that this will be completed by the end of 2025.

## 2.6 Maintain Public Housing occupancy rate at a minimum of 96%.

### Objectives by year:

2020

- Implement all actions committed in the Corrective Action Plan
- Regain Standard Performer Status in HUD’s Public Housing Assessment System (PHAS)
- Optimize Yardi System’s management tool capabilities

2021

- Ensure all actions committed in the Corrective Action Plan are continued
- Continue actions to ensure Standard Performer Status in PHAS
- Optimize Yardi System’s management tool capabilities

2022

- Ensure all actions committed in the Corrective Action Plan are continued
- Continue actions to ensure Standard Performer Status in PHAS
- Optimize Yardi System’s management tool capabilities
- As part of our annual inspections in all buildings (public housing and LIHTC/RAD), review accessibility of common area amenities such as laundry rooms and garbage rooms to ensure that entrances are accessible for persons with disabilities. If not, then look at potential sources of funding to resolve the issue or alternative accommodations that can be made.

2023

- Ensure all actions committed in the Corrective Action Plan are continued and close out of the Recovery Plan
- Optimize Yardi System’s management tool capabilities including launching online applications, recertifications and resident portals for rent statements and work order requests.

- Deploy capital investments in public housing to improve REAC scores
- 2024
- Optimize Yardi System’s management tool capabilities including launching executive dashboard
  - Deploy capital investments in public housing to improve REAC scores

**2020 Progress Report:**

Ongoing. We continue to follow all actions in the corrective action plan with the goal of increasing occupancy of public housing units to 96% and of improving our REAC Physical Inspection scores and are providing quarterly reports on progress to HUD. We are also continuing to expand upon our use of YARDI’s management tools and reports, with a goal to more closely monitor vacant unit turnaround and leasing and status of work orders. This project will continue into 2021.

**2021 Progress Report:**

Ongoing. HACM implemented a coordinated approach to turning and filling vacancies during 2020 and 2021 to improve its occupancy rates. In addition, HACM implemented a limited homeless preference for public housing. HACM met its 6/30/2021 goal per the recovery plan of 96% occupancy and in July 2021, HACM is currently at 96.6% with a goal for 12/31/2021 of 98%. HACM will continue to monitor and report quarterly to HUD on three remaining items from the recovery plan through the end of 2021:

- The use of Section 18 disposition as a repositioning tool for some of the scattered sites portfolio
- Unit turnaround time (long term vacancies)
- Opening of the waitlist and/or purging of the waitlist

**2022 Progress Report:**

Ongoing. HACM continues to implement best practices developed in the Recovery Plan with HUD along with performance improvement measures. To date, the occupancy rate has been sustained at 98%. We continue to work to reduce unit turn time under 30 days and address deferred maintenance needs resulting in low REAC scores.

**2023 Progress Report:**

In April 2023, HACM received a request from HUD’s Milwaukee Field Office for HACM to update its Recovery Plan to address additional conditions contributing to the Substandard PHAS score. As of April 25, 2023, HACM had two open Recovery Plan Goals; achieve and maintain a public housing occupancy rate of 97% and reduce and maintain turnaround time of vacant units to 30 days.

As of May 7, 2023, our occupancy rate is 96.71%, so we are close to the goal of 97%.



Regarding reducing and maintaining the turnaround time of vacant units to 30 days, we are well on our way. At the start of the 2019 Recovery Plan, the unit turnaround time was 257 days. Our current vacant turnaround time is 49 days. While that is a reduction of more than 200 days, we will continue our efforts, until we achieve the 30 days unit turnaround time goal.

For both of these items, new corrective action steps, as well as actions from the previous plan, are included in the HACM 2023 Updated Recovery Plan.

Additional recommendations for improvement provided by HUD which have been incorporated into the Recovery Plan include;

- Provide ongoing training for NSPIRE inspection, Wisconsin state requirements and industry standard repairs.
- Review, update and implement the existing preventative maintenance plan.
- Review inspection deficiencies in a timely matter to file appeals and when creating capital fund plan.

#### **2024 Progress Report:**

- HUD has required that we turn our vacant units and house a new tenant within 45 days, maintain an occupancy rate of 97% and implement a year-round preventative maintenance plan. We report out to HUD each month on our progress.
- As of June 2024, HACM's occupancy rate dropped slightly to 96% due to the fact there are 30 units that need substantial work in order for property operations to complete the unit turnaround. Once these units are approved by HUD for hold status, the occupancy rate will exceed 97%.
- HACM efforts to attract or retain residents include:
- HACM is continuing to offer one month's rent concession with a lease signing commitment of one- year, at Locust, Mitchell, and College Court. HACM is offering the first month's rent free and the sixth month free with a commitment of a one-year lease.
- HACM will continue to do exit interviews with tenants who have chosen to move.
- Intake has committed to getting property management five applicants per vacancy. (Intake will do a waiting list purge in order to get applicants that are still interested).
- Property Management is working with HR to identify new talent for the turn team.
- HUD allowed HACM to place several of the long-term vacancies into to a HOLD status – that approval allows HACM additional time to make repairs to units that need substantial work in order to get them back online to rent out.
- HACM was granted funds from the City of Milwaukee- these funds will be used to hire five custodians who will rotate between most of the HACM properties to help keep the properties free of debris, clean, and sanitary. To date, HACM has filled three of those positions.
- HACM has hired a third-party contractor to help with the Pest Management work order requests.

- HUD’s Real Estate Assessment Center issued the PHAS score (an annual assessment of the Public Housing portfolio) and designation for HACM’s fiscal year end 12/31/2022. On June 30, 2023, HUD issued a preliminary score of 77 and designated HACM as a standard performer. This assessment is specific to HACM’s public housing operations; however, the financial portion of the assessment was impacted by the ongoing corrective action plans for HACM’s Section 8 program. As a result, HACM’s auditor was unable to render an opinion on HACM’s 2022 financial statements by HUD’s 9/30/2023 deadline.

This resulted in the financial score of the assessment automatically being zeroed out, changing HACM’s PHAS score from 77 to 53 and its designation status from standard to troubled. HACM is confident that the agency will return to at least a standard performer status once the auditor is able to issue an opinion.

## 2.7 Continue to implement programs for Self Sufficiency.

### Objectives by year:

2020

- Launch and operationalize Crucible Inc., HACM’s community supportive services instrumentality
- Develop Strategic Plan to sustain Crucible Inc., less reliant on Public Housing funding.
- Continue to participate in the City’s Continuum of Care.
- Apply for grants to diversity revenue to sustain self-sufficiency programs.

2021

- Implement strategic plan for Crucible, Inc.
- Apply for grants to diversify revenue to sustain self-sufficiency programs.

2022

- Identify and procure an online giving tool and customer relationship software tool
- Prepare promotional material for the new nonprofit.
- Design the website for the new nonprofit.
- Create a fundraising plan for the new nonprofit.
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
- Continue to develop and refine outcome goals and determine method of measurement and reporting.

2023

- With input from the Executive Director and Board of Commissioners, determine the best structure over resident services/self sufficiency
- Identify and procure an online giving tool and customer relationship software tool
- Prepare promotional material for the new nonprofit or entity
- Design the website for the new nonprofit or entity
- Create a fundraising plan for the new nonprofit or entity
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
- Continue to develop and refine outcome goals and determine method of measurement and reporting

2024

- With input from the Executive Director and Board of Commissioners, determine the best structure over resident services/self sufficiency
- Identify and procure an online giving tool and customer relationship software tool
- Prepare promotional material for the new nonprofit or entity
- Design the website for the new nonprofit or entity
- Create a fundraising plan for the new nonprofit or entity
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
- Continue to develop and refine outcome goals and determine method of measurement and reporting

#### **2020 Progress Report:**

Ongoing. In 2020, we incorporated and launched Crucible, Inc. (an instrumentality of the Housing Authority) to perform community and supportive service activities. Since 1/1/2020, any new supportive service employees who work on self-sufficiency programs are hired under Crucible as opposed to HACM with a separate benefit package (similar to Travaux). The agency will continue to evaluate the instrumentality name and implementation during 2020-2021.

We continue to apply for grants to assist HACM's various self-sufficiency programs. Prior to the end of 2020, Crucible plans to hire a Development Director to assist with grant and fund development.

#### **2021 Progress Report:**

The COVID pandemic set the organization a bit behind in its goals for 2020. In early 2021, Crucible, Inc. hired a Development Director. In addition, discussions began on evaluation of the existing name of the instrumentality (Crucible), with the following goals in mind:

- Work with the board and others to select a new name to replace Crucible, Inc.;
- Through strategic planning, reconfirm the mission, values and case for support of the organization;
- File the 501 (c)(3) application;
- Begin to formulate a fundraising strategy;
- Identify and recruit 3-5 potential new board members for the organization;
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.

#### **2022 Progress Report:**

During 2022, HACM's Development Director and COO-Program Services continued to strategize to diversify and identify potential sources of revenue such as grants to advance or sustain HACM's self-sufficiency programming, such as Make Your Money Talk, FSS, Education Initiative, etc. HACM has put the further development of the separate branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined. Work continues on identifying outcome measures and goals for supportive services as well as on procuring an online giving tool.

#### **2023 Progress Report:**

During 2023, the Chief Operating Officer-Program Services continued to strategize with a goal of identifying and diversifying potential sources of revenue such as grants to advance or sustain HACM's self-sufficiency programming. HACM has put the further development of the separate

branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined. Work continues on identifying outcome measures and goals for supportive services as well as on procuring an online giving tool.

**2024 Progress Report:**

- During 2024, the Chief Operating Officer-Program Services and staff continued to identify opportunities for potential sources of funding (e.g., grants) or collaborations with partners to sustain or advance HACM’s self-sufficiency programs.
- HACM has put the further development of the separate branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined.
- HACM applied for and received HUD grant funding for the FSS program for calendar 2024.
- In January 2024, the HUD Jobs Plus grant for Hillside Terrace ended and residents were transitioned off of the Jobs Plus Earned Income Disregard that was in effect during the grant and back to a standard rent calculation
- In 2023, the Make Your Money Talk program provided by WWBIC for HACM residents and participants assisted 274 residents who graduated from the financial education program; 115 residents that opened an Individual Development Account (matched savings account); and 125 that used their savings to purchase a home; start a business; for post-secondary education; purchase or repair a vehicle; or for credit repair.

**2.8 Optimize HACM’s organization structure, processes, and procedures to attain Resiliency and long-term Sustainability.**

**Objectives by year:**

2020

- Continue to implement HACM’s Resiliency Plan
- Stabilize and Optimize Yardi System
- Establish effective Tax Credit Management team under Travaux umbrella
- Refresh PILOT agreement with the City in conformance with the State Law Amendment
- Continue to engage state legislature to amend HA statutes

2021

- Continue to implement HACM’s Resiliency Plan
- Continue to stabilize and optimize Yardi System
- Continue effective Tax Credit Management team under Travaux umbrella
- Refresh PILOT agreement with the City in conformance with the State Law Amendment
- Continue to engage state legislature to amend HA statutes

2022

- Evaluate options for Section 8 Restructuring to include consideration of developing an instrumentality
- Add additional contracts for property management services under Travaux
- Continue to optimize use of YARDI system.

2023

- Implement Rent Cafe Online Recertifications for Residents
- Develop a rigorous staff onboarding, training and continuous education program.

2024

- Evaluate transitioning public housing and section 8 accounting services into new software.

### **2020 Progress Report:**

Activities are ongoing.

**Resiliency Plan:** We will continue to implement HACM's Resiliency Plan (for example, the creation of Travaux and Crucible, Inc. as instrumentalities/subsidiaries is one component).

**YARDI:** In 2019, HACM converted its housing software from VisualHomes to the YARDI system. Our staff on both the public housing, rent assistance and affordable housing (tax credit) sides have continued to implement and refine use of YARDI during 2020.

In May/June 2020, we implemented the YARDI RentCafe module in order to open the Housing Choice Voucher (HCV) waitlist online, and then use a random lottery to select 3,000 applicants. In September 2020, we opened the Project Based Voucher (PBV) wait lists using RentCafe. We plan to open the public housing family waiting list in early 2021 using RentCafe. We also plan to begin implementation of RentCafe for public housing and rent assistance intake forms and for annual recertifications in 2021.

**Tax Credit Management:** In January 2020 HACM became the property manager to three tax credit properties; Holton Terrace, Merrill Park, and Becher Court. HACM will continue to develop and improve management skills to support future property management contracts.

**PILOT:** There has been no change to the PILOT (Payment in Lieu of Taxes) payment to the City of Milwaukee during 2020. We continue to look for opportunities to refresh that agreement.

**State Statutes:** HACM continues to work to educate state legislators around the need to update the statutes surrounding public housing authorities to bring them more in line with HUD policies.

### **2021 Progress Report:**

Activities are ongoing.

**YARDI:** In 2021, we continued work on implementation of RentCafe for use for intakes and recertifications. We also planned for an opening of the public housing and Housing Choice Voucher wait lists through RentCafe in September 2021. We continue efforts to clean up the system for conversion errors/issues and ensure the system is used to its full capacity.

**Tax Credit Management:** In October 2021, HACM/Travaux will take on the management of two additional tax credit properties: Scattered Sites Tax Credit I and Scattered Sites Tax Credit II,

each of which is 24 units. HACM will continue to develop and improve management skills to support future property management contracts.

PILOT: There has been no change to the PILOT (Payment in Lieu of Taxes) payment to the City of Milwaukee during 2021. We continue to look for opportunities to refresh that agreement.

State Statutes: HACM continues to work to educate state legislators around the need to update the statutes surrounding public housing authorities to bring them more in line with HUD policies.

### **2022 Progress Report:**

Yardi: HACM has opened the public housing and housing choice voucher wait lists through RentCafe. We have also begun to use mobile inspections and mobile work orders. We are working toward launching the RentCafe portal for resident online payments, work order requests, recertifications, housing intake and rent statements.

Tax Credit Management; Effective 1/1/2022 HACM took back all property management contracts for our affordable portfolio. This includes 120 units at Cherry Court, 80 units at Convent Hill, 114 units at Highland Gardens, 201 units at Lapham Park, 122 units at Townhomes at Carver Park, 24 units at Scattered Site Tax Credit 1, 24 units at Scattered Site Tax Credit 2, 8 units at 2<sup>nd</sup> Street Scattered Sites, 250 units at Westlawn Renaissance, 30 units at WG Scattered Sites, 60 units at Victory Manor and 94 units at Westlawn Renaissance III.

### **2023 Progress Report**

Yardi: Implementation of enterprise-wide Yardi software is ongoing. Section 8 program begun using the Yardi financial suite in January 2023. Public Housing management and Affordable (Tax Credit) property manager are using Yardi online platform RentCafe for waitlist, intake eligibility, and recertifications. Section 8 continues to evaluate use of Yardi RentCafe for online intake eligibility and recertifications.

### **2024 Progress Report**

**Yardi Housing Suite:** In July 2019, HACM converted from the previous housing software (VisualHomes) to Yardi for its various housing programs: Public housing ; affordable (low income tax credit housing); and market rate housing .

Since that time, HACM has expanded its use to optimize efficiency and effectiveness. In 2023, Public housing and the affordable tax credit programs implemented the RentCafe portal for use for initial eligibility of applicants when selected (intake) and for recertifications.

In early 2024 , the tenant-based Housing Choice Voucher program began to use RentCafe for online intake eligibility and for recertifications. In the summer of 2024, the project-based voucher (PBV) program did the same.

In fall 2023, HACM also rolled out a RentCafe portal for landlords.

**YARDI Financials:** HACM operates four (4) Housing Programs: Public Housing, Low Income Housing Tax Credit (LLCs), Market Rate “affordable” rental units, Section 8 Rental Assistance. HACM’s Central Office Cost Center provides management and oversight of these programs.

In June 2019, HACM Implemented/transitioned to Yardi Software. It was a “phased implementation” with “Housing system” portion implemented first while the general ledger and financial reporting remained under the existing system (Multiview) with the exception of LLCs portfolio.

In January 2023, the Section 8 general ledger system was implemented. Beginning in 2023, information reported in the Voucher Management System come directly from Yardi VMS reporting, allowing for better tracking and reconciliation.

The last phase of the transition started in October of 2023 which covers the implementation of the general ledger system for Public Housing and Market Rate programs.

This last phase of implementation includes the auxiliary modules (capital fund management, procurement, fixed assets). We expect completion of full enterprise-wide use of the system starting with January 1, 2025 transactions.

## **2.9 Increase HACM’s Mixed Income-Mixed Use Real Estate Portfolio.**

### **Objectives by year:**

2020

- Close financing of Convent Hill South Project
- Parklawn Cyber School and YMCA building disposition
- Apply as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood, using College Court, other HACM AMPs, or any other assisted housing developments in the area as target housing developments.
- Apply for CNI Planning grant for Hillside
- Provide support to facilitate a “Purpose Built”-like community at Westlawn or on any feasible location where a HACM project is or will be located.

2021

- Pre-development Planning for Arlington, Riverview and Locust Court AMP preservation and revitalization
- Apply for CNI Implementation grant for Hillside

2022

- Look at possibility of re-applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood, using College Court, other HACM AMPs, or any other assisted housing developments in the area as target housing developments.

2023

- Continue to evaluate opportunities for CNI Implementation grants for Near West Side neighborhood, using College Court, Hillside Terrace or other HACM AMPs, or any other assisted housing developments in the area as target housing developments.

2024

- Continue to evaluate opportunities for CNI Implementation grants for Near West Side neighborhood, using College Court, Hillside Terrace or other HACM AMPs, or any other assisted housing developments in the area as target housing developments.

**2020 Progress Report:**

Ongoing efforts have been made on several activities.

Convent Hill South: Financing has not been established or closed in 2020. This is still in planning stages.

Disposition of community buildings at Parklawn to Central City Cyberschool: Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. This has not yet been finalized.

CNI application for Near West Side: In December 2020 and/or in 2021, HACM intends to apply as applicant or co-applicant for CNI Implementation grant to transform the Near West Side neighborhood, with College Court (WI002000011), other HACM AMPs and/or any other assisted housing developments for families not owned by HACM in the area as target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan.

CNI Planning grant for Hillside: The current regulations in the Notice of Funding Availability for a Choice Neighborhoods Planning grant do not allow former HOPE VI housing sites to apply. Thus, Hillside is currently not eligible for this grant.

**2021 Progress Report:**

Ongoing efforts have been made on several activities.

Convent Hill South: Convent Hill South continues to remain in the planning stages.

Disposition of community buildings at Parklawn to Central City Cyberschool: Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. This has not yet been finalized.

CNI application for Near West Side: In December 2020, the City of Milwaukee applied as the lead applicant with HACM as the co-applicant for a Choice Neighborhood Implementation (CNI) grant to transform the Near West Side neighborhood, with College Court (WI002000011) and another assisted housing development for families not owned by HACM (Meadow Village) as the target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. In April 2021, the City and HACM were informed that the application was not a finalist for CNI funding. HACM may re-apply in 2021 or 2022.



CNI Planning or Implementation grant for Hillside Terrace: The current regulations in the Notice of Funding Availability for a Choice Neighborhoods Planning grant do not allow former HOPE VI housing sites to apply. Thus, Hillside is currently not eligible for this grant.

Arlington/Riverview/Locust preservation/redevelopment: This is still in pre-planning stages.

**2022 Progress Report:**

Choice Neighborhood: No updates for CNI grants as no developments are currently eligible under HUD regulations.

Hillside Terrace renovations: Proposed renovation of Hillside Terrace continues in the planning stages, with an estimated start time of 3-5 years.

Convent Hill South: Convent Hill South continues to remain in the planning stages.

Disposition of community buildings at Parklawn to Central City Cyberschool: Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. This has not yet been finalized

**2023 Progress Report:**

There has been no progress regarding CNI grants for other developments, since the HUD eligibility requirements have not yet changed. However, we will continue to evaluate feasibilities of future applications.

Hillside Terrace renovations: Proposed renovation of Hillside Terrace continues in the planning stages, with an estimated start time of 3-5 years.

Convent Hill South: Convent Hill South continues to remain in the planning stages.

**2024 Progress Report:**

There has been no progress regarding CNI grants for other developments, since the HUD eligibility requirements have not yet changed. However, we will continue to evaluate feasibilities of future applications.

Hillside Terrace renovations: Proposed renovation of Hillside Terrace continues in the planning and pre-development stages, with an estimated start time of 3-5 years.

Convent Hill South: Convent Hill South continues to remain in the planning stages. No new work has been completed in 2024.

**2.10 Implement Choice Mobility Initiatives.**

**Objectives by year:**

2020

- In partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program, develop and implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program.
- Continue to provide choice mobility vouchers, if available, to any RAD residents that request one (after one year of living in RAD after conversion).

#### 2021

- Continue to implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program (in partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program).
- Continue to provide choice mobility vouchers, if available, to any RAD residents that request one (after one year of living in RAD after conversion).

#### 2022

- Continue to implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program (in partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program).
- Continue to provide choice mobility vouchers, if available, to any RAD residents that request one (after one year of living in RAD after conversion).

#### 2023

- Continue to implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program (in partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program).
- Implement a HUD HCV Mobility Demonstration program if a grant is awarded by HUD. If the grant application was not successful, apply again if funding is available.
- Continue to evaluate and revise promotional and informational materials regarding Choice Mobility, if needed, with the goal to improve these materials.

#### 2024

- Implement a HUD HCV Mobility Demonstration program if a grant is awarded by HUD. If the grant application was not successful, apply again if funding is available.
- Continue to evaluate and revise promotional and informational materials regarding Choice Mobility, if needed, with the goal to improve these materials.

#### **2020 Progress Report:**

Ongoing. HACM's Rent Assistance department, working with the Milwaukee County Rent Assistance program and the Metropolitan Milwaukee Fair Housing Council and the national organization MDRC have developed procedures and protocols to use in a demonstration project

called Opportunity MKE. This project will work with rent assistance participants to promote and support choice mobility to neighborhoods of opportunity.

In December 2020, HACM will coordinate and submit an application for a grant from HUD for the Housing Choice Voucher (HCV) Mobility Demonstration grant program. Partners in this program include Milwaukee Metropolitan Fair Housing Council, the Milwaukee County Housing program, and possibly the Waukesha County housing program.

This demonstration will allow participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work together in their regions to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

**2021 Progress Report:**

Ongoing. HACM’s Rent Assistance department, working with the Milwaukee County Rent Assistance program and the Metropolitan Milwaukee Fair Housing Council (MMFHC) and the national organization MDRC have developed procedures and protocols to use in a demonstration project called Opportunity MKE. This project will work with rent assistance participants to promote and support choice mobility to neighborhoods of opportunity.

Through June 2021, the number of participants has been less than expected. HACM and MMFHC have entered into a data sharing agreement to allow MMFHC to do direct promotion of the program to HACM participants via phone and mail. HACM and MMFHC continue to evaluate progress, challenges, and identify potential barriers to participation in the program and to make policy or procedural changes when practical to reduce barriers.

In December 2020, HACM submitted an application for a grant from HUD for the Housing Choice Voucher (HCV) Mobility Demonstration grant program. This demonstration will allow participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work together in their regions to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

Partners in this program include Milwaukee Metropolitan Fair Housing Council and the Milwaukee County Housing program. In late spring 2021, HUD informed HACM that its proposal was unsuccessful and did not receive funding. If there is a second round of funding, HACM plans to re-apply for a similar Housing Choice Voucher Mobility demonstration gra

**2022 Progress Report:**

Opportunity MKE: Number of families enrolled in the Opportunity MKE choice mobility demonstration project as of July 2022 are as follows:

	# Attained	# Needed
<b># Families enrolled</b>	242	280

From HACM	214	
From Milwaukee County Housing Auth	27	
From Waukesha Housing Auth	1	
<b># Families in Program Group</b>		200
From HACM	106	
From Milwaukee County Housing Auth	12	
From Waukesha Housing Auth	1	
<b># Families in Control Group</b>		200
From HACM	108	
From Milwaukee County Housing Auth	15	
From Waukesha Housing Auth	0	

HUD HCV Mobility Demonstration Grant Program: In late 2022, HUD plans to release a Notice of funding availability for another round of the HCV Mobility Demonstration program. HACM plans to submit a new application for this program, in partnership with Milwaukee Metropolitan Fair Housing Council and the Milwaukee County Housing program.

This demonstration will allow participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work together in their regions to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

**2023 Progress Report:**

Housing Mobility Related Services Grant: On June 1, 2023, HUD issued a Notice of Funding Opportunity (NOFO) for a Housing Mobility Related Services grant, with grant applications due August 30, 2023. The Metropolitan Milwaukee Fair Housing Council (MMFHC) contacted HACM and wanted to partner with HACM on an application for the HUD Mobility Services grant.

HACM staff reviewed the NOFO application and program implementation requirements. Given that the current top priority for the Rent Assistance program is to implement Corrective Action Plans from HUD to improve utilization and performance, HACM Senior Management believes it

unfortunately does not have sufficient capacity to apply for and implement a new mobility services program.

MMFHC has offered to assist with the application and many of the activities during implementation as a subcontractor to HACM under the grant program. However, after careful review, HACM staff believe it would still entail a significant amount of HACM assistance, data, and time to apply for and implement the program. In the end, HACM does not believe it has the capacity to take this on as well as implement the required HUD Corrective Action Plans.

HACM has informed MMFHC that it could potentially apply in future years, though MMFHC has expressed their concern that this grant funding may not be available in future years or that experienced staff may not be available in future years.

**2024 Progress Report:**

No changes from 2023

**2.11 Apply for various Development and Supportive Services grants whenever /wherever they are available.**

**Objectives by year:**

2020

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- Apply as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood, using College Court, other HACM AMPs or any other assisted housing developments in the area as target housing developments.
- Submit for a CNI Planning grant for Hillside Development.
- Apply for Housing Trust Fund grants as needed.

2021

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- If unsuccessful in 2020, apply as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood, using College Court, other HACM AMPs or any other assisted housing developments in the area as target housing developments.
- Submit for a CNI Planning grant for Hillside Development.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.

2022

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- If unsuccessful in 2020, reevaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College

Court, other HACM AMPs or any other assisted housing developments in the area as target housing developments.

- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.
- Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

2023

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- Re-evaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College Court, Hillside Terrace, other HACM public housing AMPs or any other assisted housing developments in the area as target housing developments.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.
- Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

2024

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- Re-evaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College Court, Hillside Terrace, other HACM public housing AMPs or any other assisted housing developments in the area as target housing developments.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.
- Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

**2020 Progress Report:**

Ongoing.

Affordable Housing Program (AHP) Awards: HACM received two AHP awards in 2019. Federal Home Loan Bank of Chicago awarded Holton Terrace and Federal Home Loan Bank of Pittsburgh awarded Westlawn Renaissance III. HACM has 3 additional applications for Merrill Park, Becher Court and Westlawn Renaissance VI that are pending in 2020 and HACM will continue applying for this program when feasible.

CNI application for Near West Side: In December 2020 and/or in 2021, HACM intends to apply as applicant or co-applicant for CNI Implementation grant to transform the Near West Side neighborhood, with College Court (WI002000011), other HACM AMPs and/or any other assisted housing developments for families not owned by HACM in the area as target housing

developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan.

**2021 Progress Report:**

Ongoing.

CNI Planning grant for Hillside: The current regulations in the Notice of Funding Availability for a Choice Neighborhoods Planning or Implementation grant do not allow former HOPE VI housing sites to apply. Thus, Hillside is currently not eligible for this grant.

Affordable Housing Program (AHP) Awards: HACM was not successful in 3 applications for AHP grants: Merrill Park, Becher Court and Westlawn Renaissance VI. HACM will continue applying for this program when feasible and is currently planning on applying for Westlawn Ren. V.

CNI application for Near West Side: In December 2020, the City of Milwaukee applied as the lead applicant with HACM as the co-applicant for a Choice Neighborhood Implementation (CNI) grant to transform the Near West Side neighborhood, with College Court (WI002000011) and another assisted housing development for families not owned by HACM (Meadow Village) as the target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. In April 2021, the City and HACM were informed that the application was not a finalist for CNI funding. HACM may re-apply in 2021 or 2022.

**2022 Progress Report:**

Choice Neighborhood: No updates for CNI grants as no developments were currently eligible.

Affordable Housing Program (AHP) grants: In Fall 2021, an AHP grant was submitted for Westlawn Renaissance V.

American Rescue Plan Act (ARPA) funding: HACM submitted an application to the City of Milwaukee in August 2021 for \$9,000,000 to assist with the Westlawn Revitalization to help to fill a \$15 million financing gap. This was awarded by the City in late 2021. In addition, HACM was part of a City of Milwaukee application to the State of Wisconsin for an additional \$6 million from the State.

**2023 Progress Report:**

Choice Neighborhood: No updates for CNI grants as no developments were currently eligible.

Affordable Housing Program (AHP) grants: In 2023, HACM has not submitted any AHP applications.

American Rescue Plan Act (ARPA) funding: HACM submitted an application to the City of Milwaukee in August 2021 for \$9,000,000 to assist with the Westlawn Revitalization to help to fill a \$15 million financing gap. This was awarded by the City in late 2021. In addition, HACM was part of a City of Milwaukee application to the State of Wisconsin for an additional \$6 million from the State. Both amounts were awarded during 2022.

**2024 Progress Report:**

Choice Neighborhood: No updates for CNI grants as no developments were currently eligible.

Affordable Housing Program (AHP) grants: In 2024, HACM has not submitted any AHP applications.

American Rescue Plan Act (ARPA) funding: HACM submitted an application to the City of Milwaukee in August 2021 for \$9,000,000 to assist with the Westlawn Revitalization to help to fill a \$15 million financing gap. This was awarded by the City in late 2021. In addition, HACM was part of a City of Milwaukee application to the State of Wisconsin for an additional \$6 million from the State. Both amounts were awarded during 2022. Activities are ongoing.

**2.12 Develop/Implement Comprehensive Housing Plan**

**Objectives by year:**

2020

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2021

- Continue to look for opportunities to obtain Moving-to-Work type plan.

2022

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2023

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2024

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

**2020 Progress Report:**

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2020, we continue to review the potential for such a program.

**2021 Progress Report:**

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2021, we continue to review the potential for such a program.

**2022 Progress Report:**



Ongoing. HACM continues to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible.

During 2022, the Wisconsin State Legislature passed legislation to allow housing authorities of a first class city (i.e., Milwaukee) to develop mixed income housing developments for persons of low or moderate income if the property was wholly or partially owned prior to 10/1/2021 (2021 Wisconsin Act 196).

While we have not submitted an application for a Moving to Work program in 2022, we continue to review the potential for such a program.

**2023 Progress Report:**

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2022, we continue to review the potential for such a program.

HACM will continue to collaborate with the City of Milwaukee in areas where we can be of assistance in delivering the City's affordable housing goal.

**2024 Progress Report:**

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2022, we continue to review the potential for such a program.

HACM will continue to collaborate with the City of Milwaukee in areas where we can be of assistance in delivering the City's affordable housing goal.

**2.13 Secure capital through the Capital Fund Financing Program (CFFP) if RAD is not feasible.**

**Objectives by year:**

2020: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.

2021: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.

2022: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.

2023: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.

2024: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.

**2020 Progress Report:** Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2020 at this time.

**2021 Progress Report:** Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2021 at this time.

**2022 Progress Report:** Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2022 at this time.

**2023 Progress Report:** Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2023 at this time.

**2024 Progress Report:** Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2024 at this time.

## **2.14 Ensuring HACM’s sustainability by effectively responding to crises, such as the COVID-19 pandemic, that require changes in business practices to protect residents and employees.**

### **Objectives by year:**

2020

- Redesign business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Procure PPE (personal protective equipment) to assist with objective #1.
- Continue to implement YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process.

2021

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Continue to procure PPE (personal protective equipment) to assist with objective #1.
- Complete implementation of YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process.

2022

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Complete implementation of YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process.

2023

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Complete implementation of YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process.

2024

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Complete implementation of YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process.

#### **2020 Progress Report:**

Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 and on eviction moratorium to HACM residents.
- Encouraging proper hand washing and use of sanitizer when hands can't be washed.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Procurement of personal protective equipment (PPE) such as appropriate disinfectant materials, masks, gloves, hand sanitizer, etc.
- Enhanced disinfection of common areas and surfaces for housing developments and offices.
- Prioritizing emergency work orders and pest control during times when access to apartments is limited.
- Distribution of over 20,000 face masks to HACM residents.

#### **2021 Progress Report:**

Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 and on eviction moratorium to HACM residents.
- Encouraging proper hand washing and use of sanitizer when hands can't be washed.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Procurement of personal protective equipment (PPE) such as appropriate disinfectant materials, masks, gloves, hand sanitizer, etc.
- Enhanced disinfection of common areas and surfaces for housing developments and offices.
- Prioritizing emergency work orders and pest control during times when access to apartments is limited.
- Distributing and promote information on the COVID-19 vaccine, including locations and times of vaccination sites. Partnered with the City of Milwaukee Health Department and other organizations such as federally qualified health centers and pharmacies to provide transportation to vaccination sites or hold onsite vaccination clinics in housing developments. In HACM's highrise/midrise buildings, this resulted in vaccination rates ranging from 45% to 80% of residents being fully vaccinated.

- HACM continues during the summer 2021 to heavily promote vaccination, including door-to-door community mobilization and immunizations in our family developments.

**2022 Progress Report:**

Ongoing.

In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 to HACM residents.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Distributing and promote information on the COVID-19 vaccine, including locations and times of vaccination sites. Partnered with the City of Milwaukee Health Department and other organizations such as federally qualified health centers and pharmacies to provide transportation to vaccination sites or hold onsite vaccination clinics in housing developments. In HACM’s highrise/midrise buildings, this resulted in vaccination rates ranging from 45% to 80% of residents being fully vaccinated.
- HACM continues during 2022 to promote vaccinations including booster shots, through partner agencies including on-site clinics at developments when possible.
- HACM continues to provide technical assistance to residents to assist in completing Emergency Rent Assistance applications to agencies such as SDC if any resident owes back rent for reasons due to the COVID pandemic

**2023 Progress Report:**

- During the COVID-19 pandemic, HACM had redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments. While the national public health emergency declaration from the President ended in May 2023, HACM continues to utilize tools and procedures that were redesigned in light of the pandemic, including increased use of technology, virtual meetings, etc.

**2024 Progress Report:**

- During the COVID-19 pandemic, HACM had redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments. While the national public health emergency declaration from the President ended in May 2023, HACM continues to utilize tools and procedures that were redesigned in light of the pandemic, including increased use of technology, virtual meetings, etc.
- The use of an electronic portal, YARDI RentCafe, continued to be rolled out across the entire HACM portfolio. In 2023, it was used for public housing, both for intake and recertification, and for the Low Income Housing Tax Credit new admissions (intake) and recertifications. In 2024, the Housing Choice Voucher department implemented

RentCafe for new admissions (intakes) and recertifications. The use of an electronic portal allows faster and more efficient communication with residents/participants.

DRAFT

**C.2.**  
**RAB Hearing**  
**Comments**

# RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

## **2025 Annual PHA Plan**

### **1. RAB Comments: How much time does the RAB have to provide comments on this year's agency plan?**

**HACM Response:** For inclusion in the draft of the Agency Plan, RAB comments that are received by July 29<sup>th</sup> will be included in the initial draft. However, any RAB member can also send comments to Ken Barbeau or LaKeidra Madison after that for inclusion, or can formally submit them in writing to HACM prior to the September HACM Board of Commissioners meeting, or can attend the Public Hearing at the September Board meeting to provide comments in person. The Public Hearing is at the September HACM Board of Commissioners meeting on Wednesday, September 11, 2024 at 3:00 p.m. at City Hall, Room 301-A, 200 E. Wells Street, Milwaukee, Wi 53202.

After the public hearing, the Board of Commissioners will vote on the documents and any additional changes at the October Board meeting. The Annual PHA Plan and 5-Year PHA Plan are required to be submitted to HUD by October 17, 2024.

### **2. Grievance Procedures: When were the revised Grievance Procedures reviewed by the RAB in 2023 approved by the Board of Commissioners?**

**HACM Response:** The revisions to HACM's Grievance Procedures for Federally-Assisted Public Housing were approved by the HACM Board of Commissioners along with a revised Public Housing lease at their meeting on December 13, 2023.

### **3. Homeownership: Can a Project-Based Voucher participant who is accepted into the Housing Choice Voucher (tenant-based program) use their voucher immediately for Section 8y Homeownership, or do they need to wait for a period of time?**

**HACM Response:** One of the eligibility criteria is that the household must not be in the initial first year of the HCV HAP contract. Therefore, they must wait for a year before they can convert their voucher into a Section 8y voucher to use for their mortgage.

### **4. Public Safety: Often, residents and resident organizations are not updated about an investigation. One example is the theft of a television from a common area and two break-in's into the vending machines earlier this year at one housing development.**

**HACM Response:** There are two things that HACM cannot do: share personally-identifiable information about another resident (unless it is already public information such as if they were

## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

charged with a crime) or if there is an active Milwaukee Police Department investigation (so that we do not impact that investigation). We can share general information, however, regarding the items. We will be setting up a meeting with that building's resident organization to update them on what information is possible to share regarding those incidents.

### **5. Security Cameras: There is a discussion in the Agency Plan about obtaining new security cameras in new locations or replacing outdated old cameras with newer ones. Can we get those cameras expedited?**

**HACM Response:** HACM is continually reviewing the need for additional security cameras or replacing older cameras, and trying to prioritize based on: (1) the need and risk of crime in the specific location in the development; and (2) the available budget or other funding (e.g., grant, etc.) for such equipment in that housing development.

### **6. Public Safety: Can the RAB receive a copy of the revised Memorandum of Agreement between HACM and the Milwaukee Police Department (MPD)?**

**HACM Response:** Yes, we will provide a copy to RAB members.

### **7. Pet Policy: One RAB member felt that some residents are having larger and more aggressive breeds such as pit bulls and rottweilers. She is not sure if the dog is a pet or an assistance animal. However, she feels that if we are required to allow these in the case of an assistance animal, that HACM should require the owners to have personal liability insurance.**

**HACM Response:** In our revision of policies regarding Assistance Animals after issuance of FHEO Notice 2020-01 and other HUD/DOJ guidance on the subject, HACM had originally proposed to incorporate restrictions on breeds that had restrictions in our pet policies, such as pit bulls and rottweilers. However, on advice of our legal counsel, it was determined that such a breed restriction for an approved assistance animal could be a violation of fair housing regulations, and so it was removed from the policy.

Regarding the subject of insurance: Page 10-9 of the HACM Admissions and Continued Occupancy Policy states that "PHAs may not require pet owners to obtain or carry liability insurance." This language is based on the Code of Federal Regulations 24 CFR 5.318 (d)(5) which states, "project owners or PHAs may not prescribe pet rules that impose additional financial obligations on pet owners that are designed to compensate the project owner or PHA for costs associated with the presence of pets in the project, including (but not limited to) requiring pet owners: (i) To obtain liability or other insurance to cover damage caused by the pet"



## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

Thus, based on our review, it does not appear that a public housing authority can impose a requirement for a resident to obtain personal liability insurance on a pet or on an assistance animal.

**8. Substantial Deviation/Significant Amendment to Agency Plan: One RAB member thought that some of the significant amendment thresholds listed in the Agency Plan were too high, such as the addition of a capital fund project that is not included in the current 5-year action plan of \$1,000,000 or more. They felt these amounts should be revised to a smaller threshold amount.**

**HACM Response:** In early 2018, this definition of significant amendment was updated by the HACM Board of Commissioners, after a review by the HACM management and the Resident Advisory Board. Prior to that, HACM's policy on the definition of significant amendment and substantial deviation had not been updated in many years.

HACM's capital funding is approximately \$8,000,000 annually. A significant amendment is a change in policy that significantly and materially alters HACM's stated mission, goals, objectives and activities as stated in the Plan. Significant amendments require public hearings and public notice.

The significant amendment policy that was approved by the HACM Board of Commissioners in 2018 was that the significant amendment/public hearing process should not be triggered by minor changes in a capital budget or in minor wording changes. Rather, it should be reserved for items such as major changes or additions to a capital item, material changes to rent policies, admissions policies, etc., or major changes on demolition, disposition or conversion activities.

The definition of significant amendment included items such as the addition of a capital fund project that is not included in the current 5-year action plan of over \$1,000,000. The determination was that a smaller change of \$100,000 or several hundred thousand in the capital budget of \$8 million for one year did not appear significant enough compared to the annual or 5-year capital plan to require a public notice process for a public hearing before the Board of Commissioners. In addition, this larger threshold is not unusual for larger public housing authorities.

**9. HOPE VI/Choice Neighborhood program: Is this list of developments in an order by priority for applying for a CNI grant?**

**HACM Response:** No, the order of the developments in this section is mostly alphabetical and is not in any order by priority. We have listed all possible public housing developments so that in the event that a development was eligible for a CNI grant, we could immediately begin an

## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

application and not wait for a process to amend the Annual PHA Plan to include the development in it.

### **10. HOPE VI/Choice Neighborhoods: When was the last time that a Scattered Sites development received one of these grants?**

**HACM Response:** Milwaukee received a \$19.5 million HOPE VI grant in 2003 for Scattered Sites and a HOPE VI grant for \$6.7 million in 2008 for additional Scattered Sites. In both of these, older scattered sites were demolished and replaced with new buildings.

### **11. RAD: Are there any RAD conversions that are upcoming or identified yet?**

**HACM Response:** HACM continues to evaluate all developments for the potential for a transformation, using RAD, Section 18 disposition, or a blend of both. To move forward, we would need to ensure the housing development is eligible for the conversion and identify funding/financing sources for the conversion. We have not identified the next development that will be examined for possible RAD conversion yet.

### **12. LIHTC and RAD: When you are looking for an investor, keep in mind that residents can be the investors/owners as well. This was done somewhere else in the country, possibly in Massachusetts.**

**HACM Response:** HACM typically puts out a Request for Proposals for Equity Investors so that the procurement process is competitive. We are not aware of any resident organizations that have purchased the equity investment in a housing development, but please feel free to email any information you have on it or we can inquire with HUD. We believe there may be barriers for a resident organization to be the equity investor, including: (1) the ability to pay for the low income housing tax credits (LIHTC); and (2) the fact that the income tax credits would not be worth anything to a resident organization since the RO is not an entity that pays income taxes.

HACM is aware that HUD has a separate regulation regarding the disposition (sale) of a public housing development or a portion of a development. In those cases, a PHA shall offer the eligible resident organization the opportunity to purchase the property, if the resident entity has expressed an interest in purchasing the property for continued use as low-income housing and if they can obtain financing within 60 days.

However, this rule for a disposition does not include situations where a public housing authority seeks a disposition outside the public housing program to privately finance or otherwise

## RAB Comments on HACM’s draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

develop a facility to benefit low-income families, such as a day care center, administrative building, mixed-finance housing, or other types of low-income housing.

**13. Designated Housing Plan:** There was a concern by some of the RAB members about newer residents in general. The RAB member said it was not just an issue of older residents vs. younger disabled residents—she admitted some of the issues in our developments also come from older residents. However, the RAB member asked about what was done to review new resident background checks?

**HACM Response:** HACM does plan to submit an application to HUD for a new designated housing plan. It has been delayed due to other priorities related to Corrective Action Plans. Once it is submitted, it would need to go through a detailed review by HUD’s Fair Housing and Equal Opportunity division.

HACM wants to clarify Designated Housing is only applicable to public housing developments.

For RAD/LIHTC developments, at the time of conversion, HACM can no longer designate units only for elderly or persons with disabilities. For these developments that were formerly in a designated housing category, HACM could and did create a wait list preferences for elderly, near elderly, and persons with disabilities.

In the meantime, HACM may also investigate the possibility of creating a preference for seniors and/or persons with disabilities for public housing. This is different from “designated housing” as it is a preference, and not an eligibility issue, but we will look into this possibility.

Criminal background checks are run on all applicants to our housing developments; we review a State of Wisconsin Department of Justice criminal background check and a CCAP (Consolidated Court Automation Program) background check. HACM specifically looks at crimes of violence against persons or properties or drug offenses, and can go back up to 3 years.

When using background checks, PHAs also have to be careful to follow HUD regulations on fair housing in criminal background checks, and look at convictions rather than just arrest information. In addition, on 4/10/2024, HUD issued a proposed rule on Reducing Barriers to HUD-Assisted Housing that could change these regulations again. We will review this rule once it is finalized by HUD to ensure HACM is in compliance.

Additionally, we also want to point out that often it is not the actual resident who creates the issues. They may have a clean background. Rather, it is the persons that they associate with

## RAB Comments on HACM’s draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

that create issues in our developments, and then we need to hold them accountable for their guest’s actions.

In addition, we do landlord references for the past year (one year) ask about other conduct that may impact other residents’ health, safety and welfare. We have a proposed revision in our Admissions and Continued Occupancy Policy (ACOP) to increase this landlord check back to the previous policy of reviewing where they lived the past 3 years.

### **14. Progress Report, Goal 2.2 Implementation of Westlawn Choice Neighborhood grant: What is the Black Business Boost program and would businesses outside of the Westlawn CNI neighborhood be assisted?**

**HACM Response:** The Business Boost program is managed by WWBIC and funded by PNC Bank. While the CNI neighborhood was targeted, it was open to businesses in the Milwaukee area. The Business Boost program encourages entrepreneurs to position their small businesses as a pathway to building generational wealth. It is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital.

Earlier this year, WWBIC announced that they were still working with ongoing participants, but that the program had reached full capacity and is no longer accepting new applications. They recommend all entrepreneurs to take advantage of free business training offerings from WWBIC that are listed on the website: <https://www.wwbic.com/trainings/>

Also, for entrepreneurs in need of access to capital, they offer the following resources:

WWBIC lending: <https://www.wwbic.com/business-lending/>

Kiva@WWBIC: <https://www.wwbic.com/kiva/>

### **15. Progress Report, Goal 2.2 Implementation of Westlawn Choice Neighborhood grant: While the CNI grant is ending, can the Best Baby Zone (BBZ) project be continued?**

**HACM Response:** The BBZ program was originally managed by United Way until their funding for the program was completed. At that point, HACM stepped in to continue as fiscal agent and to coordinate the program as a CNI initiative until December 2023. Due to program funding being fully expended, HACM cannot sustain ongoing program coordination. HACM has worked with the BBZ resident ambassadors to transfer the program to another organization or group that has the capacity to sustain the initiative activities, if one is identified.

## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

**16. Budgets—One RAB member wanted to point out that many residents support full-time property managers and full-time maintenance staff at a development, and feel that it is important to have them full time rather than split.**

**HACM Response:** HACM would prefer to have staff assigned 100% to one development as well. However, this is not always possible.

In some cases, it is an issue of staff capacity ---if we have a staff person out on some type of leave, we try to fill in as best we can with another staff person who may be trying to cover two developments. Thus, this may be a temporary assignment until the person returns from leave.

In other cases, it is a budgetary issue. Depending on the housing development's budget, it may not be possible to have a property manager or a maintenance mechanic that is 100% dedicated to one development. Instead, it may make more financial sense working within the available budget to split the person's time between two smaller developments, so that they are covering a similar number of units as someone that works at a larger housing development that has more units.

**17. Smoking: Similar to comments about unauthorized pets, RAB members also mentioned that, several years after smoking was banned in most HACM housing (public housing and RAD developments), there still are persons that smoke either in their unit or just outside the door. What can management do?**

**HACM Response:** Even though every resident signs a lease addendum regarding the no-smoking policy, there continue to be issues with smoking in or near to housing. When we have direct evidence of smoking, we do follow our policy which includes a graduated approach to reiterate the policy with the resident and offer other assistance (such as smoking cessation support). However, it can be a challenge in enforcing the policy as it is often not evidence or the smell cannot be attributed to one unit.

HACM will add language into the Agency Plan that HACM will do more outreach and education in the next year in restating the rules , and will work to ensure staff are aware of importance of using the graduated process of handling these types of lease violations.

# RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

## 5-Year PHA Plan

**18. Section B2, Goal 1, "Objective 1: Optimize use of the Yardi Software system, including RentCafe portals for applicants, residents/participants, and landlords."**

**Several RAB members pointed out that while some of them prefer using RentCafe rather than paper and find use of it very easy, other residents are struggling with it. They said that everyone is not there yet in terms of knowledge or technology. They asked if there were ways that staff could be available by appointment or during certain hours to assist persons in how to use RentCafe and enter information into it? Or, can residents be trained so that they can assist other residents?**

**HACM Response:** HACM agrees with the RAB that the biggest barrier to use of RentCafe is for a resident or applicant to log in and register for the first time. If they can do that and remember their password, the software does walk them through the process for most person. The long-term goal is to move towards use of automated software, which will simplify and shorten the process by reducing mailing of documents back and forth.

However, the RAB's points are well-taken in the short-term. In most housing developments, HACM management office staff have assisted residents in logging on and completing their paperwork. In the Rent Assistance office, there are certain hours set aside for assisting residents with RentCafe. Also, Resident Liaison staff have assisted with helping residents complete their recertification paperwork online.

HACM agrees that RentCafe technical assistance needs to be provided for residents, as necessary, in a consistent manner from program to program, and development to development.

We also agree that different residents may need different levels of assistance. For some, just the availability of a computer to work on may be helpful. For others, it may be assistance with resetting of a forgotten password or with logging on for the first time. And for some, it may be assisting them through training on their first recertification or an initial intake process, including necessary attachments.

HACM will modify the current objective or will include a new objective under this goal to include a commitment by HACM to providing technical assistance and training for applicants and residents.

## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

**19. Section B2, Goal 1: Speaking of technology, one RAB member asked why it takes so long for money to come out of her bank account and get credited to her resident ledger, after paying with a check?**

HACM Response: Payments need to get posted to the resident ledger by either the management office or the accounting department. Payments can be through ACH (direct debit) or via personal check or money order. Postings can be late for a few reasons, including but not limited to: (1) staff out on vacation or leave and so the posting is delayed; (2) technical issues with the posting through Yardi.

If you notice that a payment that you made has not cleared your bank in a reasonable amount of time, or has not been credited on your resident ledger, please follow up with your property manager so it can be investigated by them and our Accounting dept.

**20. Section B2, Goal 1, RentCafe and Accessibility: YARDI RentCafe has issues with ADA accessibility with RentCafe. It does not work appropriately with devices used by blind individuals.**

HACM's RentCafe portal adheres to Website Content Accessibility Guidelines (WCAG) 2.1, Level AA standards in the design, testing, and development of its website experiences.

Any residents who need a reasonable accommodation for themselves or a member of their household should contact HACM at 414-286-5678 (voice) or 414-286-3504 (TDD).

HACM is aware of one resident at the development mentioned who is visually impaired. Staff has been in touch with that resident to determine their communication preferences and to address any issues.

**21. Section B2, "Goal 2: Maintain optimal occupancy rates for HACM's public and affordable housing developments and improve PHAS score for Public Housing to improve HACM back to a standard performer, and eventually as a high performer."**

**Are applicants still given a choice to pick where they want to live?**

HACM Response: Since Public Housing has one waiting list, residents selected off that wait list are offered choices of developments with available ready units at the time the application is approved.

Since Project-Based Vouchers (PBVs) have site-based waiting lists (specific to that one development), when they are selected off that wait list and approved, they are only offered a unit at that development, in the bedroom size they are eligible for. They cannot select another

## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

PBV development. So, for example, if you were selected off the Merrill Park PBV wait list, you cannot just change it to a different housing development.

### **22. Section B2, Goal 2: The draft objectives emphasize filling vacancies quickly. Would not another way to maintain high occupancy be to reduce the number of move-outs?**

**HACM Response:** This is an excellent suggestion. Yes, reducing resident turnover would also help to maintain our occupancy rates. Resident retention is improved when: (1) a landlord provides good communication with residents and responds to resident requests in a respectful manner; (2) a landlord deals with maintenance requests timely; (3) a landlord takes action with neighbors that are causing issues or disturbing the residents' peaceful enjoyment of their apartment; and (4) landlords and residents maintain street appeal and cleanliness.

HACM will add another objective under this goal related to resident retention.

### **23. Section B2, "Goal 3: Maintain optimal utilization rate for the Housing Choice Voucher program within the funding that is available from HUD and ensure all policies and procedures have been updated to ensure that the voucher program assists applicants/participants to the greatest extent feasible. Also improve SEMAP scores to return from a troubled status to a standard performer, and eventually to high performer status."**

**With the 100% participant file review, when they do rent calculations and if something was miscalculated, if the rent decreases and the Housing Assistance Payment increases, I'm assuming that HACM will need to reimburse the resident. What happens if it goes the other way—if the voucher participant now owes more for some reason?**

**HACM Response:** HACM has never been in the situation of having to do a 100% file review before. The selected Contractor that will be managing and operating the voucher program will be working closely with both HUD and HACM to determine what should be done in each situation. HUD does often require voucher holders to pay if they were undercharged. However---It probably will depend on a number of different circumstances. Was it income that the participant did not disclose to HACM at that time? Was the amount significant? Was it instead an error on HACM's part? We will work with the Contractor and HUD to determine how HUD wants us to resolve each type of discrepancy.



RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

**24. Section B2, Goal 3: PBVs: I'm a RAB member and I never heard of some of these buildings that are not owned by HACM but have PBVs. You need to include these in some list so that we understand what they are.**

**HACM Response:** There are a few buildings not owned by HACM that have PBVs, though they are not many. We will put a list of buildings owned by other developers/entities in which HACM has awarded PBVs and will provide it to the RAB. We can also look to see if we can include the information in our Agency Plan or Admin Plan.

**25. Section B2, Goal 3: RFP for Management and Operation of the HCV Program: Can we review the credentials of the selected Contractor? Also, will that Contractor be invited to attend RAB meetings regularly?**

**HACM Response:** Once the HACM Board of Commissioners has approved a final recommendation of all the proposals submitted, we will bring information to the RAB regarding the process and describe the experience and credentials of the selected Contractor. In addition, at some point during the transition, we may ask the Contractor to do a presentation to the RAB. When issues arise for the RAB that are related to the voucher program, we anticipate the Contractor or their representative will be asked to attend the RAB meeting to discuss.

**26. Section B2, "Goal 4: Enhance housing quality, safety and security, and resident quality of life, through staff training, accountability, collaboration with partners, resident engagement, and strong customer service."**

**A RAB member said that some of HACM's public safety dispatchers and some other HACM staff are very nonchalant. They seem like they do not know how to talk with people. If you want to improve customer service, this needs to change.**

**HACM Response:** Thank you for your feedback. HACM expects each staff person, no matter their job title, to provide good customer service and to communicate with our residents professionally, with honesty, dignity, and respect. HACM is looking into the process and cost of having the ability to record telephone calls to our dispatch center, so that we can have the recordings with both the resident and our staff. In this way, we can check when there are reported issues or questions.

RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

**ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)**

**27. ACOP, Chapter 3, Eligibility: A long time ago, HACM used to do home visits to people's current apartments to see how clean they kept their unit, etc. I know that has not been done in years, but perhaps there are other ways to obtain that information like interviewing the applicant.**

**HACM Response:** Except for some very small housing authorities, most PHAs have stopped performing home visits of applicants as they were inefficient and slowed down the applicant/approval process. This is why we are putting forward the proposed revision to obtain landlord references for the past 3 years of their housing, rather than one year. This will enable us to get more information to use in screening to ensure their suitability as a tenant.

**28. ACOP, Pets: We have more and more issues with residents having pets or assistance animals and these are getting to be out of control in some developments. As residents, we do not know if they are approved or not. We report them to property management but do not hear back and do not know if the manager checked them out. Some dogs are running around without a leash or the resident is not picking up the dog's poop. The residents are also letting their children run wild. What can we do?**

**HACM Response:** The Vice President of Asset Management has requested all managers to inspect when there is a report of an unauthorized dog or other animal, and to check to ensure that the animal was appropriately approved under the rules of that development. If a pet is unauthorized, the resident should get a 30-day curable notice to get rid of the pet to another person or organization. In addition, even if a pet has been appropriately approved as an assistance animal, they still need to follow all other rules regarding them: they must be leashed and they must clean up after their animal. Otherwise, that is also a lease violation. While we cannot release detailed information, the property manager should be able to inform a resident whether or not an animal has been approved under our policies. We will work with property management and maintenance to reiterate our rules over pets and assistance animals, and for them to report and investigate suspected pets.

## RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

**ACOP, Chapter 8, Leasing: The term "Self-Inspections" is confusing. I thought at first it was a resident inspecting their own unit, but it was HACM inspecting.**

**HACM Response:** Yes, we agree that it is confusing. I am not sure whether this is a HUD Nspire term or whether it is a Nan McKay term. It used to be called annual inspections (by a PHA). Now, they are called "self-inspections" in that the PHA is inspecting the unit themselves as opposed to a REAC inspection where a 3<sup>rd</sup> party is inspecting the unit. In reality, there is no difference from the previous practice.

**ACOP, Chapter 8, Leasing: One RAB member stated that she thought the only thing that HACM could inspect was the stove, refrigerator, and smoke detectors. Also, why is the living room blind replaced for free, but if I want blinds in the bedroom, it costs me \$20.**

**HACM Response:** No, whether it is an HQS inspection or an Nspire inspection, the inspection covers much more than the "stove, refrigerator, and smoke detectors." There are templates for the inspections of what needs to be inspected, from walls to doors to windows to outlets to sinks, etc.

We are not clear on the fees you are quoting about blinds. We will check into this and get back to the RAB with a clear answer.

**ACOP, Chapter 8, Leasing---Rents—I heard a rumor that rents are increasing. Is this true?**

**HACM Response:** No, in public housing, rents are not increasing. They are generally set at 30% of adjusted income. In public housing, flat rents which are ceilings for higher income households are examined periodically to ensure they are appropriate in comparison to comparable unit rents in the market. But, we do not believe they have changed recently.

In RAD developments, the rent paid to the owner does increase, but the rent paid by the tenant is still 30% of adjusted income.

# RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

## **ADMINISTRATIVE PLAN**

**Administrative Plan, Chapter 4 , Applications: When you do a lottery, what happens to those applicants not selected?**

**HACM Response:** They would receive a letter or email stating that they were not selected in the lottery. They would then need to reapply the next time that the waiting list is open.

**Administrative Plan, Chapter 4, Applications: What is the normal waiting time for a unit in public housing or for a voucher?**

**HACM Response:** There is no "normal" waiting time. The wait lists currently have thousands of applicants on them, which is why we recently closed the public housing and voucher wait lists as they were getting too large. The wait time depends on a lot of different factors: what is the resident turnover in a development; what is the bedroom size (HACM has fewer of some bedroom sizes; very large families in 4-6 bedroom units do not move frequently due to the small supply of units that large in the market; . It is difficult to tell how long someone can be on a wait list.

With the lottery in the HCV program, the general goal is that we will want to select a wait list size in the lottery that will fill our needs for about 2 years.

**Other---HACM Board of Commissioners: How many members are on the Board of Commissioners? How many are residents? When will it be a full board?**

**HACM Response:** There are 7 positions on the HACM Board of Commissioners. HUD requires one position of the seven to be filled by a resident and the state statutes require a 2<sup>nd</sup> position to also be filled by a resident.

Currently, there are 4 board members, although one of them is serving under an expired term and has been re-nominated by the Mayor. The Mayor has nominated three additional members as well that now need to go to the Common Council for approval. We anticipate approval of board members this fall, but the timing is up to the Mayor and Common Council and at this point we do not know if and when they will be approved.

**C.3.**  
**HUD-50077-SL**  
**Certification by**  
**Local Official**

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Cavalier Johnson, the Mayor of the City of Milwaukee  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2025-  
2029 and/or Annual PHA Plan for fiscal  
year 2025 of the Housing Authority of the City of Milwaukee is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Milwaukee

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

The Annual PHA Plan for the Housing Authority of the City of Milwaukee (HACM) includes goals and activities that are consistent with the Consolidated Plan and the Analysis of Impediments, specifically as follows: 1) improving and sustaining affordable housing through the Choice Neighborhood Implementation grant in partnership with the City of Milwaukee, through use of mixed finance development and through participation in the HUD Rent Assistance Demonstration program (RAD); 2) providing housing for seniors and disabled individuals; 3) providing opportunities for low-income families to improve economic self-sufficiency through employment, training, education, financial literacy, asset-building, and homeownership programs.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

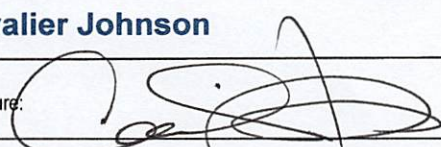
Name of Authorized Official:

**Cavalier Johnson**

Title:

**Mayor**

Signature:



Date:

7/29/2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**C.4.**  
**Challenged**  
**Elements**

## **C.4. CHALLENGED ELEMENTS**

**This section can't be completed until all Public Comments have been received, and those notes and responses compiled.**

**Available mid/late September, 2024.**



**TAB**

# **Attachment A: Public Notice**

DRAFT



# THE DAILY REPORTER

A Division of BridgeTower Media  
P.O Box 745929  
Atlanta, GA 30374-5929

Invoice # 745714694  
Invoice Date 07/26/2024  
Customer CITY Of Milwaukee  
Payment Terms Net 30  
Due Date 08/25/2024

### BILLING ADDRESS

Patricia Dee  
CITY Of Milwaukee Housing Authority  
Po Box 324  
Milwaukee WI 532010324

### ADVERTISER

CITY Of Milwaukee Housing Authority, ID:  
Po Box 324  
Milwaukee WI 532010324

INVOICE REF	MEDIA	DATE	PO	EDITION	QTY	AD SIZE
1007370411	The Daily Reporter - Public Notice	07/26/24		Legal - Government	1	Legal - City of Milwaukee Inch Rate

Thank you for your business!  
IOID: 2634843  
Index: Government  
Category: Hearings and Minutes  
Affidavit Reference: City of Milwaukee

<b>Subtotal</b>	\$88.48
<b>Tax</b>	\$0.00
<b>Credits</b>	\$0.00
<b>BALANCE DUE</b>	\$88.48

### REMITTANCE STUB TO BridgeTower Media

<b>Invoice #</b>	745714694 The Daily Reporter - Public Notice	<b>Date</b>	08/25/2024	<b>Customer ID</b>	ID: 26574, CITY Of Milwaukee Housing Authority
<b>Amount Enclosed:</b>					

### Acceptable Payment Methods

<b>PREFERRED METHOD</b> <b>To Pay by ACH Transfer:</b> Bank: Bank of America Send ACH remittance email to ar@bridgetowermedia.com Account Number: 237025443017 Routing: 053000196	<b>OTHER METHODS</b> <b>To Pay by Check use the following address:</b> Please include invoice number on check BridgeTower OpCo, LLC P.O Box 745929 Atlanta, GA 30374-5929	<b>To Pay by Credit Card:</b> Use the Click to Pay Online link located on the email you received or Contact Accounts Receivable: 866-802-8214 Please have your Invoice Number and Credit Card Number Ready	<b>To Pay by Wire Transfer:</b> Name: BridgeTower OpCo, LLC Bank: Bank of America Swift Code: BOFAUS3N Bank Address: 100 North Tryon Street Charlotte, NC 28255 Account Number: 237025443017 Routing: 053000196
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# THE DAILY REPORTER

## Affidavit of Publication

To: CITY Of Milwaukee Housing Authority - Patricia Dee  
Po Box 324  
Milwaukee, WI, 532010324

Re: Legal Notice 2634843, City of Milwaukee

State of WI }

} SS:

County of Milwaukee }

I, Joe Yovino, being duly sworn, depose and say: that I am the Authorized Designee of The Daily Reporter, a daily newspaper of general circulation in Milwaukee, County of Milwaukee, State of WI; that a notice, of which the annexed is a printed copy, has been duly and regularly published in the The Daily Reporter once each day for 1 consecutive days; and that the date of the publication were as follows: 07/26/2024.

Publishers fee: \$88.48

By:



Joe Yovino

Sworn to me on this 26<sup>th</sup> day of July  
2024

By:



Russell A. Klingaman  
Notary Public, State of WI  
No. -

Qualified in Milwaukee County  
My commission expires on December  
31, 2026

### PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2025-2029 PUBLIC HOUSING AUTHORITY (PHA) FIVE-YEAR PLAN, 2025 PHA ANNUAL PLAN AND A SIGNIFICANT AMENDMENT TO THE 2023-2027 CAPITAL FUND PROGRAM FIVEYEAR ACTION PLAN

This 45-day Public Notice is hereby given that the Housing Authority of the City of Milwaukee will hold a public hearing for its Public Housing Authority (PHA) Five-Year Plan for the period 2025-2029, the 2025 PHA Annual Plan, the Admissions and Continued Occupancy Policy (ACOP), the Section 8 Administrative Plan, and all other associated documents. There will also be a public hearing regarding a Significant Amendment to the Capital Fund Program (CFP) Five-Year Action Plan for the period 2023 to 2027. The purpose of the hearings will be to receive comments as required by the U.S. Department of Housing and Urban Development (HUD).

The Housing Authority of the City of Milwaukee will hold the public hearings on **Wednesday, September 11, 2024 at 3:00pm in City Hall Room 301-A, 200 E. Wells St., Milwaukee WI 53202.** The Board reserves the ability to place time limits on all speakers, in order to allow the widest practical number of interested parties a chance to speak on the documents above. All comments must be related to the documents listed above.

Interested persons are invited to submit their comments on the Housing Authority's 2025-2029 PHA Five-Year Plan, the 2025 PHA Annual Plan, the Admissions and Continued Occupancy Policy (ACOP), the Section 8 Administrative Plan, and all other associated documents. or on the Significant

Amendment to the 2023-2027 CFP Five- Year Action Plan via email at [communications@hacm.org](mailto:communications@hacm.org) or via mail to Attention Mr. Willie Hines, Secretary-Executive Director, Housing Authority of the City of Milwaukee, P.O. Box 324, Milwaukee WI 53201. **All written comments must be received by Monday, September 9, 2024.**

A draft of the PHA Five-Year Plan, PHA Annual Plan, associated documents, and the amended 2023-2027 CFP Five-Year Action Plan will be available for review at [www.hacm.org](http://www.hacm.org) for a 45-day comment period: July 26, 2024 - September 9, 2024.

Please note that upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids. For additional information or assistance contact Marquetta Treadway at 414-286- 5100 (voice) or 414-286-3504 (TDD) or by writing to the ADA Coordinator at HACM, P.O. Box 324, Milwaukee WI 53201.

2634843/7-26

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**TAB**

# **Attachment B: Public Hearing**

DRAFT

## **Attachment B. PUBLIC HEARING**

**This section can't be completed until the Public Hearing has taken place, and those notes and responses compiled.**

**Available mid/late September, 2024.**