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| Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i> | U.S. Department of Housing and Urban Development Office of Public and Indian Housing | OMB No. 2577-0226 Expires: 03/31/2024 |
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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, including changes to these policies, 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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

| A. PHA Information. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------|---|-----------------------------|---------------------------------|------------------------------|-----|--------------------|----------|-----------------------------|---------------------------------|------------------------------|--|----|-----|-----------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| A.1 | <p>PHA Name: <u>Housing Authority of the City of Milwaukee</u> PHA Code: <u>WI002</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2023</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>2,445</u> Number of Housing Choice Vouchers (HCVs) <u>7,531</u> Total Combined Units/Vouchers <u>9,976</u></p> <p>PHA Plan Submission Type: <input type="radio"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. 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. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Housing Authority of the City of Milwaukee has posted a copy of its 2020 to 2024 5-Year Agency Plan, and the 2022 and 2023 Annual PHA Plan on its website, http://www.hacm.org/ 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"> <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>Lead PHA:</td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> <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 | Lead PHA: | | | | | | | | | | | | | | | | | | | | | | | |
| Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | PH | HCV | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lead PHA: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| B. | Plan Elements |
| B.1 | <p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Statement of Housing Needs and Strategy for Addressing Housing Needs: Waitlist information was updated to July 2022 info.</p> <p>Deconcentration and Other Policies that Govern Eligibility, Selection and Admission: Updated for information regarding adoption of the Nan McKay templates for the ACOP and Administrative Plan.</p> <p>Financial Resources: This info has been updated based on most current information.</p> <p>Grievance Procedures: This info has been updated as part of the Resident Handbook.</p> <p>Homeownership Program: Updated for 2022 outcomes, including ACTS program</p> <p>Community Service and Self-Sufficiency Plan: Minor edits to Financial literacy program, Neighborhood Networks, FSS, and Section 3 program.</p> <p>Safety and Crime Prevention: Added training plan for VAWA for staff for 2022 or 2023.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> |
| B.2 | <p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> |
| B.3 | <p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> |

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| B.4 | <p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See reference in detail below</p> |
| B.5 | <p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: See description in detail on page 60.</p> |
| C. | Other Document and/or Certification Requirements. |
| C.1 | <p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/> Attachment C</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> |
| C.2 | <p>Certification by State or Local Officials. Attachment D</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> |
| C.3 | <p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. Attachment E & F</p> |
| C.4 | <p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. Attachment G</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> |
| C.5 | <p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> |

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| D. | Affirmatively Furthering Fair Housing (AFFH). |
| D.1 | <p data-bbox="180 289 617 315">Affirmatively Furthering Fair Housing (AFFH).</p> <p data-bbox="180 340 1437 459">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> <div data-bbox="180 485 1453 934"> <p data-bbox="191 491 436 520">Fair Housing Goal:</p> <p data-bbox="191 527 888 556"><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div> <div data-bbox="180 959 1453 1373"> <p data-bbox="191 966 436 995">Fair Housing Goal:</p> <p data-bbox="191 1001 888 1031"><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div> <div data-bbox="180 1398 1453 1850"> <p data-bbox="191 1404 436 1434">Fair Housing Goal:</p> <p data-bbox="191 1440 888 1470"><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div> |

Attachment

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

Statement of Housing Needs and Strategy for Addressing Housing Needs:

HACM will continue to focus on finding ways to meet the affordable housing needs of City of Milwaukee residents, including families, elderly, disabled individuals, and minorities with disproportionate housing needs. In the area of shortage of affordable housing, HACM will work to maximize the number of affordable units available by reducing turnover time for vacant housing units and minimize the number of units offline due to routine maintenance or renovation work and will seek to replace units lost to the inventory through mixed finance development and Section 8 replacement housing resources. HACM will work to maintain Section 8 lease up rates by establishing payment standards that are beneficial to families in the City, by effectively screening applicants to increase owner acceptance of the program and by marketing the Section 8 program to owners, particularly those outside areas of minority and poverty concentration. HACM will participate in the Consolidated Plan development process to ensure coordination with broader community strategies. HACM will also attempt to increase the number of affordable units by applying for Section 8 vouchers as they become available, by leveraging resources in the community through the creation of mixed finance housing and through other non-public housing or Section 8-based assistance. HACM will continue to work with the Continuum of Care in addressing the housing needs of Milwaukee's homeless residents. . In an effort to meet the growing needs of families with disabilities, HACM will carry out modifications based on a Section 504 Needs Assessment and will continue its work with Independence First to expand homeownership opportunities for families with disabilities. HACM will also conduct activities that affirmatively further fair housing by marketing to racial and ethnic minorities with disproportionate housing needs, counseling Section 8 tenants as to location of units outside of areas of poverty or minority concentration and marketing the Section 8 program to owners outside of areas of poverty and minority concentration.

Below are the status of waiting lists as of July 2022:

Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- ☐ Section 8 tenant-based assistance
☒ Public Housing (general occupancy)
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/sub jurisdiction:

| | # of families | % of total families | Annual Turnover |
|--------------------------------------|---------------|---------------------|-----------------|
| Waiting list total | 12,050 | | 200-300 |
| Extremely low income <=30% AMI | 9,667 | 80.2% | |
| Very low income (>30% but <=50% AMI) | 2,006 | 16.7% | |
| Low income (>50% but <80% AMI) | 343 | 2.9% | |
| Families with children | 5,213 | 43.3% | |
| Elderly families (62+) | 242 | 2.0% | |
| Families with Disabilities | 2,522 | 20.9% | |
| Race - White | 1,362 | 11.3% | |
| Race – Black | 10,866 | 90.2% | |
| Race – Asian/Other | 484 | 4.0% | |
| Ethnicity – Hispanic | 830 | 6.9% | |

Characteristics by Bedroom Size (Public Housing Only)

| | | | |
|-------|-------|-------|--|
| 1BR | 6,933 | 57.5% | |
| 2 BR | 2,579 | 21.4% | |
| 3 BR | 1,601 | 13.3% | |
| 4 BR | 786 | 6.5% | |
| 5 BR | 127 | 1.1% | |
| 5+ BR | 24 | 0.2% | |

Is the waiting list closed (select one)? ☒ No ☐ Yes

If yes:

HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)? OPENED IN DEC 2021

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?

☐ No ☐ Yes (See ACOP)

Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- ☐ Section 8 tenant-based assistance
- ☒ Public Housing Highrises (**general occupancy**)
- ☐ Combined Section 8 and Public Housing
- ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/sub jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---------------|---------------------|-----------------|
| Waiting list total | 2,906 | | 200-300 |
| Extremely low income <=30% AMI | 2,565 | 88.3% | |
| Very low income (>30% but <=50% AMI) | 270 | 9.3% | |
| Low income (>50% but <80% AMI) | 56 | 1.9% | |
| Families with children | 223 | 7.7% | |
| Elderly families (62+) | 339 | 11.7% | |
| Families with Disabilities | 2,037 | 70.1% | |
| Race – White | 713 | 24.5% | |
| Race – Black | 2,218 | 76.3% | |
| Race – Asian/Other | 139 | 4.8% | |
| Ethnicity – Hispanic | 276 | 9.5% | |

Characteristics by Bedroom Size
(Public Housing Only)

| | | | |
|-------|-------|-------|--|
| 1BR | 2,567 | 88.3% | |
| 2 BR | 339 | 11.7% | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |

Is the waiting list closed (select one)? ☒ No ☐ Yes

If yes:

HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)? OPENED IN DEC 2021

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?

☐ No ☐ Yes (See ACOP)

Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- ☒ **Section 8 tenant-based assistance (Housing Choice Vouchers)**
☐ Public Housing
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/subjurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---------------|---------------------|-----------------|
| Waiting list total | 8,670 | | 600 |
| Extremely low income <=30% AMI | 6,878 | 79.3% | |
| Very low income (>30% but <=50% AMI) | 1,538 | 17.7% | |
| Low income (>50% but <80% AMI) | 225 | 2.6% | |
| Families with children | 4,271 | 49.3% | |
| Elderly families | 422 | 4.9% | |
| Families with Disabilities | 2,119 | 24.4% | |
| Race-White | 1,393 | 16.1% | |
| Race-Black | 7,462 | 86.1% | |
| Race-Asian/Other | 475 | 5.5% | |
| Ethnicity – Hispanic | 725 | 8.4% | |

Characteristics by
Bedroom Size (Public
Housing Only)

| | | | |
|-------|----------------|--|--|
| 1BR | Not applicable | | |
| 2 BR | Not applicable | | |
| 3 BR | Not applicable | | |
| 4 BR | Not applicable | | |
| 5 BR | Not applicable | | |
| 5+ BR | Not applicable | | |

Is the waiting list closed (select one)? ☒ No ☐ Yes

If yes: How long has it been closed (# of months)? Opened in Dec 2021

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No
☐ Yes (See Administrative Plan)

| Housing Needs of Families on the Waiting List | | | |
|---|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Cherry Court) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 2,244 | | |
| Extremely low income <=30% AMI | 1,993 | 88.8% | |
| Very low income (>30% but <=50% AMI) | 205 | 9.1% | |
| Low income (>50% but <80% AMI) | 33 | 1.5% | |
| Families with children | 52 | 2.3% | |
| Elderly families | 276 | 12.3% | |
| Families with Disabilities | 1310 | 58.4% | |
| Race-White | 375 | 16.7% | |
| Race - Black | 1,899 | 84.6% | |
| Race—Asian/Other | 112 | 5.0% | |
| Ethnicity – Hispanic | 142 | 6.3% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 2,244 | 100.0% | |
| 2 BR | N/A | | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) -Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|---|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Highland Gardens) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 3,150 | | |
| Extremely low income <=30% AMI | 2,777 | 88.2% | |
| Very low income (>30% but <=50% AMI) | 302 | 9.6% | |
| Low income (>50% but <80% AMI) | 58 | 1.8% | |
| Families with children | 543 | 17.2% | |
| Elderly families | 337 | 10.7% | |
| Families with Disabilities | 1,667 | 52.9% | |
| Race -White | 563 | 17.9% | |
| Race -Black | 2,618 | 83.1% | |
| Race -Asian/Other | 164 | 5.2% | |
| Ethnicity – Hispanic | 224 | 7.1% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 2,522 | 80.1% | |
| 2 BR | 628 | 19.9% | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | | | |
| If yes: | | | |
| How long has it been closed (# of months) Opened in September 2020 | | | |
| Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |
| Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|---|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Convent Hill) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 2,973 | | |
| Extremely low income <=30% AMI | 2,572 | 86.5% | |
| Very low income (>30% but <=50% AMI) | 331 | 11.1% | |
| Low income (>50% but <80% AMI) | 58 | 2.0% | |
| Families with children | 45 | 1.5% | |
| Elderly families | 450 | 15.1% | |
| Families with Disabilities | 1,861 | 62.6% | |
| Race -White | 693 | 23.3% | |
| Race - Black | 2,325 | 78.2% | |
| Race -Asian/Other | 148 | 5.0% | |
| Ethnicity- Hispanic | 229 | 7.7% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 2,973 | 100.0% | |
| 2 BR | N/A | | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | | | |
| If yes: | | | |
| How long has it been closed (# of months) Opened in September 2020 | | | |
| Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |
| Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Lapham Park) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 2,148 | | |
| Extremely low income <=30% AMI | 1,903 | 88.6% | |
| Very low income (>30% but <=50% AMI) | 196 | 9.1% | |
| Low income (>50% but <80% AMI) | 39 | 1.8% | |
| Families with children | 346 | 16.1% | |
| Elderly families | 200 | 9.3% | |
| Families with Disabilities | 1,148 | 53.5% | |
| Race -White | 377 | 17.6% | |
| Race--Black | 1,809 | 84.2% | |
| Race -Asian/Other | 105 | 4.9% | |
| Ethnicity- Hispanic | 142 | 6.6% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 1,729 | 80.5% | |
| 2 BR | 419 | 19.5% | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Olga Village) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 2,946 | | |
| Extremely low income <=30% AMI | 2,570 | 87.2% | |
| Very low income (>30% but <=50% AMI) | 304 | 10.3% | |
| Low income (>50% but <80% AMI) | 54 | 1.8% | |
| Families with children | 379 | 12.9% | |
| Elderly families | 364 | 12.4% | |
| Families with Disabilities | 1,781 | 60.5% | |
| Race -White | 668 | 22.7% | |
| Race--Black | 2,310 | 78.4% | |
| Race -Asian/Other | 164 | 5.6% | |
| Ethnicity- Hispanic | 286 | 9.7% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 2,462 | 83.6% | |
| 2 BR | 484 | 16.4% | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Holton Terrace) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 1,945 | | |
| Extremely low income <=30% AMI | 1,743 | 89.6% | |
| Very low income (>30% but <=50% AMI) | 164 | 8.4% | |
| Low income (>50% but <80% AMI) | 30 | 1.5% | |
| Families with children | 39 | 2.0% | |
| Elderly families | 247 | 12.7% | |
| Families with Disabilities | 1,173 | 60.3% | |
| Race -White | 385 | 19.8% | |
| Race--Black | 1,585 | 81.5% | |
| Race -Asian/Other | 99 | 5.1% | |
| Ethnicity- Hispanic | 143 | 7.4% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 1,945 | 100% | |
| 2 BR | N/A | | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Merrill Park) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 1,725 | | |
| Extremely low income <=30% AMI | 1,546 | 89.6% | |
| Very low income (>30% but <=50% AMI) | 152 | 8.8% | |
| Low income (>50% but <80% AMI) | 20 | 1.2% | |
| Families with children | 40 | 2.3% | |
| Elderly families | 203 | 11.8% | |
| Families with Disabilities | 1,023 | 59.3% | |
| Race -White | 330 | 19.1% | |
| Race--Black | 1,430 | 82.9% | |
| Race -Asian/Other | 81 | 4.7% | |
| Ethnicity- Hispanic | 117 | 6.8% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 1,725 | 100% | |
| 2 BR | N/A | | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Becher Court) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 2,744 | | |
| Extremely low income <=30% AMI | 2,402 | 87.5% | |
| Very low income (>30% but <=50% AMI) | 280 | 10.2% | |
| Low income (>50% but <80% AMI) | 49 | 1.8% | |
| Families with children | 570 | 20.8% | |
| Elderly families | 262 | 9.6% | |
| Families with Disabilities | 1,470 | 53.6% | |
| Race -White | 650 | 23.7% | |
| Race--Black | 2,136 | 77.8% | |
| Race -Asian/Other | 140 | 5.1% | |
| Ethnicity- Hispanic | 281 | 10.2% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 2,055 | 74.9% | |
| 2 BR | 689 | 25.1% | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|---|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Scattered Sites) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 8,945 | | |
| Extremely low income <=30% AMI | 7,163 | 80.1% | |
| Very low income (>30% but <=50% AMI) | 1,580 | 17.7% | |
| Low income (>50% but <80% AMI) | 151 | 2.0% | |
| Families with children | 8,228 | 92.0% | |
| Elderly families | 84 | 0.9% | |
| Families with Disabilities | 1,269 | 14.2% | |
| Race -White | 1,239 | 13.9% | |
| Race--Black | 7,967 | 89.1% | |
| Race -Asian/Other | 431 | 4.8% | |
| Ethnicity- Hispanic | 759 | 8.5% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | N/A | | |
| 2 BR | 5,190 | 58.0% | |
| 3 BR | 2,856 | 31.9% | |
| 4 BR | 773 | 8.6% | |
| 5 BR | 126 | 1.4% | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Victory Manor) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 2,784 | | |
| Extremely low income <=30% AMI | 2,247 | 80.7% | |
| Very low income (>30% but <=50% AMI) | 431 | 15.5% | |
| Low income (>50% but <80% AMI) | 86 | 3.1% | |
| Families with children | 150 | 5.4% | |
| Elderly families | 251 | 9.0% | |
| Families with Disabilities | 1,083 | 38.9% | |
| Race -White | 324 | 11.6% | |
| Race--Black | 2,501 | 89.8% | |
| Race -Asian/Other | 143 | 5.1% | |
| Ethnicity- Hispanic | 155 | 5.6% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 2,784 | 100% | |
| 2 BR | N/A | | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Westlawn Gardens Midrise) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 3,012 | | |
| Extremely low income <=30% AMI | 2,597 | 86.2% | |
| Very low income (>30% but <=50% AMI) | 332 | 11.0% | |
| Low income (>50% but <80% AMI) | 63 | 2.1% | |
| Families with children | 106 | 3.5% | |
| Elderly families | 489 | 16.2% | |
| Families with Disabilities | 1,751 | 58.1% | |
| Race -White | 394 | 13.1% | |
| Race--Black | 2,666 | 88.5% | |
| Race -Asian/Other | 145 | 4.8% | |
| Ethnicity- Hispanic | 145 | 4.8% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 3,012 | 100% | |
| 2 BR | N/A | | |
| 3 BR | N/A | | |
| 4 BR | N/A | | |
| 5 BR | N/A | | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Westlawn Gardens) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) | | | |
| If used, identify which development/subjurisdiction: | | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 13,998 | | |
| Extremely low income <=30% AMI | 11,156 | 79.7% | |
| Very low income (>30% but <=50% AMI) | 2,436 | 17.4% | |
| Low income (>50% but <80% AMI) | 361 | 2.6% | |
| Families with children | 7,898 | 56.4% | |
| Elderly families | 308 | 2.2% | |
| Families with Disabilities | 2,487 | 17.8% | |
| Race -White | 1,712 | 12.2% | |
| Race--Black | 12,659 | 90.4% | |
| Race -Asian/Other | 670 | 4.8% | |
| Ethnicity- Hispanic | 1,028 | 7.3% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 5,822 | 41.6% | |
| 2 BR | 4,571 | 32.7% | |
| 3 BR | 2,695 | 19.3% | |
| 4 BR | 757 | 5.4% | |
| 5 BR | 153 | 1.1% | |
| 5+ BR | N/A | | |
| Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes | | | |

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions:

Detailed language regarding deconcentration and policies that govern eligibility, selection and admissions for both the low rent and Section 8 programs can be found in the Admissions and Continued Occupancy Policy (ACOP) for public housing and the Section 8 Administrative Plan. Both documents are available upon request at all administrative offices and housing development locations and on our website at www.hacm.org.

For many years, HACM used the templates and guidance from The Schiff Group, a technical assistance consultant that works with public housing authorities (PHAs) for developing changes to its ACOP and Section 8 Administrative Plan.

In 2022, HACM decided to transition to using templates and guidance from another respected national consulting and technical assistance firm, Nan McKay, for its ACOP and Administrative Plan.

This has meant that HACM's plans have a brand new format for both the ACOP and Administrative Plan. These templates have more detail regarding the regulatory basis of the policies, and therefore are longer than the previous one.

A full reading of both plans is recommended for a complete understanding of HACM's policies and procedures.

UPDATE (APRIL 2023): On March 13, 2023, HUD released PIH Notice 2023-03, "Supplemental Guidance for Implementation of Section 103; Limitation on Public Housing Tenancy for Over-Income Families under the Housing Opportunity Through Modernization Act of 2016 (HOTMA)." HUD made the new provisions effective March 16, 2023, with full implementation by June 14, 2023 so that Public Housing Authorities can update necessary changes to their Annual Plan and Admissions and Continued Occupancy Policy and obtain appropriate approvals if a significant amendment.

This notice provided guidance on HUD's limitations on continued occupancy in public housing for over-income families. Over-income families are families over 120% of area median income. Public Housing Authorities must choose one of two options to follow for over-income families.

According to the statute, after a household's income has exceeded the over-income limit for 24 consecutive months (the "grace period"), a public housing agency (PHA) must:

- (1) Terminate the household's public housing tenancy within six months; or
- (2) Charge the household an alternative non-public housing rent ("alternative rent"). The alternative rent must equal the greater of the Fair Market Rent (FMR) or the amount of monthly subsidy provided for the unit as determined by the amount of Operating and Capital Funds apportioned to a unit. If this option is selected, the household would become a Non-Public Housing Over-Income (NPHOI) family, sign a new lease, and have some different requirements from public housing households.

HACM will implement the option to terminate the tenancy of public housing households that are over-income for 24 consecutive months.

Financial Resources:

| Financial Resources: Planned Sources and Uses | | |
|---|-----------------------|---|
| Sources | Planned Amount | Planned Uses (for Non-Federal funds) |
| 1. Federal Grants | | |
| a. Public Housing Operating Subsidy (estimated) | \$6,560,027 | |
| b. Public Housing Capital Fund (estimated) | \$8,231,011 | |
| c. HOPE VI Revitalization | | |
| d. HOPE VI Demolition | | |
| e. Annual Contributions for Section 8 Tenant-Based Assistance (estimated) | \$34,779,451 | |
| f. Public Housing Drug Elimination Program (including any technical assistance funds) | | |
| g. Resident Opportunity and Self-Sufficiency grants | | |
| h. Community Development Block Grant | | |
| i. Recovery Act Capital Funds | | |
| Other Federal Grants (list below): | | |
| 2015 Choice Neighborhood Implementation | \$2,042,863 | |
| | | |
| 2. Prior Year Federal Grants (unobligated funds only –list below) | | |
| Capital Fund Program (CFP) 2018 | \$37,486 | |
| Capital Fund Program (CFP) 2019 | \$1,004,678 | |
| Capital Fund Program (CFP) 2020 | \$46,024 | |
| Capital Fund Program (CFP) 2021 | \$5,454,248 | |
| Capital Fund Program (CFP) 2022 | \$8,231,011 | |
| | | |
| 3. Public Housing Dwelling Rental Income | \$8,331,221 | |
| | | |
| 4. Other Income (list below): | | |
| Section 32 Sales | -0- | Homeownership |
| Investment income | \$2,500 | Operations |
| Miscellaneous income | \$513,176 | Operations |
| | | |
| 5. Non-Federal Sources (list below) | | |
| HACM-owned Housing | \$7,961,268 | Operations |
| Investment income | \$119,100 | Operations |
| Miscellaneous | \$2,468,540 | Operations |
| | | |
| Total Resources | \$85,782,604 | |

Rent Determination:

No changes. Detailed language regarding rent determination for both the low rent and Section 8 programs can be found in the Admissions and Continued Occupancy Policy (ACOP) and the Section 8 Administrative Plan. Both documents are available upon request at all administrative offices and housing development locations.

Operation and Management:

The following is a list of HACM's public housing management and maintenance policy documents, manuals and handbooks that contain HACM's rules, standards, and policies that govern maintenance and management of public housing, and the policies governing Section 8 management:

- HACM Admissions and Continued Occupancy Policy
- HACM Section 8 Administrative Plan
- HACM Rent Assistance Program Office Policies
- HACM Employee Handbook
- HACM Procurement Policy
- HACM Snow Plan
- HACM Eviction Resource Guide
- HACM Emergency Preparedness Handbook
- HACM Pest Control Extermination Notice to Residents
- HACM Resident Handbook
- HACM Assistance Animal Policy

Grievance Procedures:

HACM's Grievance Procedure is provided to assure that any Housing Authority resident has the opportunity for a hearing if that resident disputes within a reasonable time any HACM action or failure to act which involves that resident's lease with the HACM or any HACM regulations which adversely affect that individual resident's rights, duties, welfare, or status. The policy document is available upon request at all administrative offices and housing development locations. The Section 8 Rent Assistance Program gives participant families an opportunity for an informal hearing to consider whether RAP decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations, and RAP policies. The informal hearing is detailed in Chapter 16 Part III (Informal Reviews and Hearings) of the Section 8 Administrative Plan.

In 2022, there are two proposed changes to the Grievance Procedures: (1) To allow more time for a resident to request a grievance hearing, from 5 days after an adverse action by HACM to 10 days after an adverse action; and (2) To add procedures allowing for virtual Grievance Hearings if both parties agree to it.

Homeownership Programs:

Section 32 Homeownership: HACM has approval from HUD to administer a Section 32 Homeownership program, assisting low income persons (both those living in public housing as well as those who are not living in public housing but are eligible for it (with an income under 80% of Area Median Income). Participants must be a first time home buyer, must have earned income of at least \$15,000/year, must attend homeownership counseling classes and must not owe child support or any state or local authority. Additional information regarding the homeownership program is available at all administrative offices and housing development offices.

In August 2008, HUD approved an amendment to the Section 32 plan to include sale of an additional 40 units from its scattered sites inventory (including AMPs WI002000010P, WI002000016P, WI002000060P, WI002000061P, and WI002000063P). As of 6/30/2022, 29 of those units had been sold. HACM has approval to sell 11 more units under its current approval.

During 2021, HACM had formed a partnership with ACTS Housing who will identify pre-approved buyers that are Section 32 eligible participants interested in purchasing a scattered site under the Section 32 program. As of 6/30/22, we have sold 12 homes in partnership with ACTS Housing.

Section 8(y) Homeownership Program: HACM also administers a Section 8(y) Homeownership Program. The Section 8(y) program assists HACM Housing Choice Voucher program participants in converting their housing voucher towards a mortgage payment instead of a rent payment. For non-disabled households, one or more adult members must be employed 30 hours or more per week and the minimum gross income requirement is \$15,000 per year. The employment requirement does not apply to a disabled or elderly family, but the family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home. At the current minimum wage of \$7.25/hour, the minimum gross income for disabled and senior households is \$14,500. Other eligibility requirements are described in Chapter 15, Part VII of the Administrative Plan. Since December 11, 2001, 270 vouchers have been converted from rental to ownership.

Westlawn Choice Neighborhoods Implementation (CNI): As part of the Choice Neighborhood Implementation grant, HACM had also included 50 Homeownership units to be sold to eligible participants as part of the housing plan.

Community Service and Self-Sufficiency Programs:

HACM has more than 30 years' experience in building innovative and award-winning partnerships with economic development and supportive service agencies. HACM's approach to community and supportive services programming has produced positive results for residents.

HACM's programming has received numerous awards and recognition from a wide variety of organizations in recent years, including:

- The "Innovations in American Government Award" from the Ford Foundation and Harvard University's JFK School of Government, for HACM's service-enriched programming at the Lapham Park elderly high-rise in 2000 (finalist) and for the Central City Cyberschool in 2001 (semi-finalist);
- Three Awards of Merit from NAHRO for HACM's family self-sufficiency program, its drug abatement partnership with local police, and the Lapham Park high-rise programming;
- "Best Practice Awards" from the U.S. Departments of Housing and Urban Development and Health and Human Services, for its enhanced services to elderly residents and its self-sufficiency programming at Hillside Terrace;
- The 2004 National Social Advocacy Award from the American Planning Association and the 2007 Award for Municipal Excellence (Gold) for large cities from the National League of Cities for HACM's Lapham Park elderly high-rise programming; and
- The 2005 World Leadership Award in the category of "Housing" presented in a ceremony at the Royal Courts of Justice in London, UK.
- The 2015 Bright Ideas recognition from the Ash Center for Democratic Governance and Innovation at the J.F. Kennedy School of Government, Harvard University, for the HACM Education Initiative.

HACM partners with a number of community organizations to provide services for residents that assist and support them and their families. Services that are available for public housing residents include:

Day Care: HACM has three licensed day care/Head Start providers on-site in our housing developments (Tomorrow's Future Early Childhood Center at Hillside, Day Care Services for Children at Parklawn, and Silver Spring Neighborhood Center at Westlawn Gardens).

Youth Services: Youth-serving agencies are on-site in two developments (a Boys & Girls Club at Hillside and the Silver Spring Neighborhood Center at Westlawn Gardens). These agencies provide a comprehensive array of recreational, educational and leadership programs for youth, both after-school and during the summer.

Education: HACM has two schools on-site in HACM housing developments. The Central City Cyberschool is a public charter school (chartered by the City of Milwaukee) that serves up to 400 students in grades K4 to 8th grade and is located at the Parklawn development. During the 2019-20 school year, the Cyberschool also started a high school program in Parklawn. Attached to the Silver Spring Neighborhood Center (SSNC) in Westlawn Gardens, the Browning Elementary School is a Milwaukee Public School (MPS) that serves children in grades K4 through the 5th grade.

HACM Educational Initiative: Since 2005, the HACM Education Initiative has sought to improve school attendance and educational achievement among youth in two public housing developments: Highland Homes and Scattered Sites. The Education Specialist works with the children to ensure they attend school every day, links them to community learning centers and tutoring programs, and helps reduce barriers to their success in school. The Education Specialist also works one-on-one with parents to develop an educational achievement plan for each child.

Adult Education: HACM partners with community organizations to provide GED preparation and adult basic education training on-site in two developments. Milwaukee Area Technical College (MATC) provides GED and adult basic skills training at Hillside Terrace and Literacy Services of Wisconsin provides such services at Westlawn Gardens through the Silver Spring Neighborhood Center. HACM also partners with the Adult Learning Center for adult basic education.

Scholarships: Public housing residents are eligible to apply for scholarships for higher education of up to \$2000 per year from HACM.

Employment/Economic Self-Sufficiency: HACM's programs in economic self-sufficiency will be discussed in more detail in (2) below.

Healthcare: HACM currently has two health clinics located in its housing developments. Located on the 2nd floor of the Hillside Family Resource Center, the Progressive Community Health Center's Hillside clinic is a federally qualified health center that provides a variety of primary care health care services to low-income families and individuals in Milwaukee. The University of Wisconsin-Milwaukee School of Nursing operates a clinic in the Silver Spring Neighborhood Center at Westlawn that provides health information and wellness services. Services at both clinics are available to residents free or on a sliding fee scale.

Services for Seniors and Persons with Disabilities: Since 1993, HACM has partnered with a nonprofit organization to serve residents in our highrise developments who may be elderly or who may have a disability and need assistance with service coordination. Formerly, HACM's partner was SET Ministry from 1993 to 2017, then UNISON from 2017-2018, and now Lutheran Social Services of Wisconsin and Upper Michigan (LSS) which provides service coordination services for residents in highrise developments. Every year, more than 1,300 residents in Milwaukee's highrise housing are assisted by social workers that assist residents by assessing their needs, assessing eligibility for programs and services that are needed by the resident, and linking the resident into those services.

Senior Meal Program: For seniors 60 and older, the Milwaukee County Department on Aging has 27 meal sites that serve a hot lunch Monday through Friday at 11:30 a.m. Four meal sites are currently located in HACM highrise developments in their community rooms (Arlington Court, College Court, Convent Hill and Lapham Park).

Neighborhood Network Centers: HACM currently has six Neighborhood Network Centers (community computer centers) located at:

| | |
|---|---------------------------------|
| Townhomes at Carver Park | 650 W. Reservoir Ave. |
| Hillside Terrace | 1452 N. 7 th Street |
| Highland Gardens | 1818 W. Juneau Ave. |
| Cherry Court | 1525 N. 24 th Street |
| Convent Hill | 455 E. Ogden Ave. |
| Westlawn Gardens (in Silver Spring Neighborhood Center) | 5460 N. 64 th Street |

Each Neighborhood Network Center offers computers and internet access for the community so that households can access information to assist with job search, school, social services and other information needed by residents. While center hours have been limited during COVID, HACM is planning on developing a calendar of open lab dates and times for late 2022 and 2023 again for these computer labs.

FSS program: HACM has a Family Self-Sufficiency Program (FSS) that serves both public housing households as well as participant households in the voucher program (including the Housing Choice Voucher, Project-based Voucher, and other vouchers), serving a goal of 100 households. The FSS Case Manager work with these participants to review the program goals and requirements, sign the participation contract, and develop and implement their individualized plan. Increases in earned income that impact rent may result in the rent increase deposited into an FSS escrow account for the resident. The FSS Case Managers work with any residents who request assistance or are referred by their managers. They will first conduct an individualized assessment to help a resident identify their interests, skills, goals, barriers, and needs. The resident and the Case Manager will then plot out a strategy to help the resident find a job or obtain a better job. The Case Manager will also refer the resident to other services available in the community that are needed to help them with job search, such as G.E.D. preparation courses, driver's education, resume assistance, interview skills, job training, and other skills to help employability.

In 2022, HUD approved changes to the regulatory guidance for the FSS program. In 2022, HACM will evaluate and make changes to its FSS Action Plan and policies to ensure compliance with the new HUD regulations over FSS.

Choice Neighborhood Case Managers: HACM currently has six case managers funded through a Choice Neighborhood Initiative (CNI) grant for the Westlawn Gardens CNI program. These case managers assist CNI households before, during and after relocation in all supportive service needs of the household, related to education, employment and healthcare. They first conduct an individualized assessment to help a resident identify their interests, skills, goals, barriers, and needs. The resident and the Case Manager will then plot out a strategy to help the resident find a job or obtain a better job. The Case Manager will also refer the resident to other services available in the community that are needed to help them with job search, such as G.E.D. preparation courses, driver's education, resume assistance, interview skills, job training, and other skills to help employability. The case managers will also assist their families with the children's education, ensuring children are attending school, graduate high school and are connected to resources to assist them in their education.

Jobs Plus (Hillside Works!): Under the 4 year Jobs Plus grant from HUD for Hillside Terrace, HACM is implementing a Jobs Plus model at Hillside Terrace. At Hillside, the model is called Hillside Works!

The three core elements of the Jobs Plus program are:

1. Employment-Related Services—Assessment, case management, linkages to services (Job Coaches)
2. Community Supports for Work—Saturate communities with work-related messages and to mobilize resident networks and create a culture of work (Community Coaches)
3. Financial Incentives to Work—Participants that enroll are granted 100% disregard of increased earnings from work in their rent calculations after enrollment during the grant period

TANF Agencies: HACM case managers work closely with the TANF agencies in Milwaukee (W-2 agencies in Wisconsin) that serve residents eligible for such services: ROSS Innovative Employment Solutions, America Works of Wisconsin, UMOS and Maximus.

Employ Milwaukee: HACM is a close partner with Employ Milwaukee, the local workforce investment agency, and has a Memorandum of Agreement with the agency. Residents are referred to and utilize the One-Stop Job Centers operated by Employ Milwaukee and also take advantage of job training opportunities if the residents are eligible for WIOA training (Workforce Innovation and Opportunity Act).

Section 3: In compliance with regulations, HACM makes every effort to hire internally and to require contractors to hire public housing residents and other Section 3 persons to the greatest extent feasible. In addition, HACM ensures that prime contractors awarded Section 3 covered contracts subcontract with Section 3 business entities to the greatest

extent feasible. In January 2014, HACM created a Section 3 Coordinator position to assist in ensuring compliance with the Section 3 regulations.

In August 2014, HACM entered into a Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) regarding Section 3. HUD and HACM entered into this VCA for the purpose of improving HACM's policies, procedures and compliance with Section 3. As part of the VCA, HACM developed a revised Section 3 Plan. In late 2018, HACM completed its VCA agreement with HUD.

HACM helps to link public housing residents and other Section 3 persons with training and employment opportunities whenever possible and does significant outreach to residents to notify them about the availability of such opportunities, through monthly resident meetings, quarterly resident employment newsletters, and through their case managers. HACM leverages training through community resources, such as the Employ Milwaukee (WIOA training), Wisconsin Regional Training Partnership, Milwaukee Area Technical College, and the Milwaukee Community Service Corps. The training provided by these agencies helps residents compete successfully for employment in the building trades.

In September 2020, HUD issued a final rule to revise the regulations that govern Section 3. During 2022, HACM has revised its Section 3 Plan and policies to be in compliance with the new Section 3 regulations and will educate contractors and residents on the new regulations.

Youthbuild: Working with the Milwaukee Builds program of Employ Milwaukee (formerly the Milwaukee Area Workforce Investment Board), HACM trains a crew of YouthBuild participants in the construction trades with a focus on young adults living in public housing or in the rent assistance program. Through YouthBuild, members can receive hands-on construction training and work on preparing for their GED. The average number of participants trained by HACM per year is 10-12 participants.

HACM also partners with the two other YouthBuild training programs in Milwaukee (Northcott and Milwaukee Christian Center) by referring other interested residents to their programs. In addition, HACM has had a long-term partnership with the Milwaukee Community Services Corps (MCSC), which provides training and job opportunities for young adults ages 18-24 who are interested in construction work but lack job experience. MCSC was established in 1991 as an Urban Corps Expansion Site and has HUD Step-Up designation. HACM has worked closely with MCSC since 1992 to provide training and job opportunities for at-risk young adults.

Job Training: After the assessment by the Resident Employment Case Manager, HACM may refer residents to job training through a number of community agencies, including but not limited to: Employ Milwaukee (WIA training), Wisconsin Regional Training Partnership (W RTP)/Big Step, Milwaukee Area Technical College (MATC), 4Cs (Child care training), and other training programs.

@Promise Program: HACM also operates a program to train residents in administrative skills through a program called the @ Promise Program, administered by HACM's Human Resources Department. Selected residents attend a short-term job skills boot camp training and afterwards are hired by HACM for a two-year part-time job. At the same time, they are offered financial assistance towards their college degree or an Administrative Specialist Associates Degree.

Financial Literacy program/Individual Development Accounts (IDAs): Since 1989, Wisconsin Women's Business Initiative Corporation (WWBIC) has been offering quality business education, technical assistance, and access to capital to women, minorities, and low-income individuals pursuing entrepreneurship and business development as a means of self-sufficiency and economic independence. WWBIC trains, counsels, advises and mentors start-up entrepreneurs, small businesses and micro-businesses throughout Wisconsin. WWBIC offers a number of classes on how to start a business, and WWBIC has also been a leader in microcredit in Wisconsin, helping to provide access to capital to women, people of color and low income individuals.

WWBIC also offers other programs, such as their personal money management program, Make Your Money Talk, a six-session series covering such topics as creating a personal budget, developing a savings plan, and dealing with past

and future credit. Graduates of the program can open an Individual Development Account (IDA), a special savings account where WWBIC will match the participant's savings \$4 for every \$1 saved, with a maximum account level of \$500 in actual participant savings and total with match of \$2000. The IDA's can be used to start a small business, purchase a first home, or further a person's education.

Safety and Crime Prevention:

There are no changes to this section.

Annually, the Housing Authority's Public Safety section responded to about 10,000 or more calls for service from residents. While the majority of these calls were responding to alarms (building alarms, fire and smoke alarms, and medical pull-cord alarms in our developments) or for quality of life issues (noise, neighbor disputes, vandalism, etc.), these calls also included a number of complaints about drugs, gun offenses, loitering/prowling, and battery and/or domestic violence.

To reduce crime and maintain safety in public housing developments, the Housing Authority of the City of Milwaukee (HACM) created a Public Safety section in the early 1990s. The mission of HACM's Public Safety is to enhance the quality of life for residents living in public housing, by working cooperatively with residents, staff, the public and other law enforcement agencies to preserve the peace, reduce crime and provide for a safe, drug-free environment in which to live, work and raise families.

The Public Safety Department has a staff of 20 full-time employees who provide service 24 hours, 365 days a year. Public Safety Dispatchers staff a communication center 24 hours a day. In addition to fielding calls for Public Safety, the Communication Center answers calls for emergency maintenance and other Housing Authority services. In 2016, the Public Safety Department responded to more than 10,000 calls for service, including building and fire/smoke alarms. Public Safety Specialists patrol developments on foot, bicycles, and marked motor vehicles. Specialists also monitor building surveillance equipment and respond to medical and burglar alarms. Public Safety staff works closely with residents to ensure their safety concerns are addressed. Public Safety Officers attend each of the monthly Resident Organization meetings, and officers have daily contact with Housing Authority managers and residents. Residents, managers, and Public Safety Officers discuss any crime and safety concerns within their developments. Crime prevention measures and intervention strategies are discussed and implemented. Residents are encouraged to call Public Safety to report problems or suspicious activities as soon as they are observed.

In collaboration with the City Attorney's Office and the Milwaukee Police Department (MPD), Public Safety has closed hundreds of drug houses operating in public housing developments. Public Safety has issued more than 200 currently active "no trespassing orders" to individuals which bars them from all Housing Authority property. These no-trespass orders are issued to all persons evicted from public housing and is an effective deterrent in excluding known drug dealers and users from public housing.

Public Safety works closely with MPD's vice squad on drug activity at the housing developments. Staff respond to drug complaints from residents and investigate the complaint. If Public Safety staff can substantiate the complaint, they will obtain "intelligence" for MPD so that a search warrant can be obtained. The intelligence gathered by the investigators include physical descriptions of the drug dealers, aliases used, hours of operation, level of sophistication of the operation, weapons used, descriptions of cars (dealers and customers), types of customers, and types of drugs sold. MPD uses this information to obtain a search warrant, and search warrants are executed jointly between MPD and Public Safety. At the time the warrants are executed, MPD secures the units, makes the arrests and secures all the evidence. Public Safety enters the unit once the unit has been secured, photographs all the evidence seized, and documents all persons who are arrested, and immediately serves them with a no trespass notice, banning them from *all* of HACM's developments and property. This information is then used to begin "One Strike, You're Out" eviction proceedings which removes illegal drug users and dealers from public housing occupancy. This initiative received a City of Milwaukee, Innovation in City Government award in 1998, and was selected as a 1998 Merit Award winner by the National Association of Housing and Redevelopment Officials.

The vast majority of Public Safety's work is responding to service calls from residents. Public Safety tracks all service calls received, aggregating them into key indicators which provide a standard measure of residents' concerns. These service call indicators provide feedback about concerns that are being address and which are escalating, requiring other interventions. The quality of life problems that are precursors to drug, gang and serious criminal activity are unabated noise complaints, loitering, disorderly conduct, panhandling, vandalism and trespassing. Public Safety responds aggressively to these complaints so that quality of life issues do not escalate into the more serious problems of domestic violence, prostitution, drug activity, gang activity and robberies.

Public Safety is responsible for patrolling the interior of the high-rise developments, parking lots, common areas and community buildings. High visibility of Public Safety is maintained through uniforms and marked vehicles which provide a visual deterrent to criminal behavior. Public Safety Specialists are used to patrol crime "hot spots." In 1999, Public Safety received the authority to issue city of Milwaukee parking tickets to vehicles parked illegally on HACM property. This added authority permits HACM to enforce parking regulations by keeping nuisance vehicles out of parking lots, and keeping fire lanes open for emergency vehicles.

The Chief of Public Safety is responsible for coordinating HACM's Public Safety efforts with those of other law enforcement agencies. As such, the Chief of Public Safety meets and communicates regularly with the Milwaukee Police Department, shares intelligence information relative to drug and gang activity, and is involved in the coordination of the execution of search warrants.

In addition, Public Safety staff meets regularly with the Milwaukee Police Department and other area law enforcement agencies to exchange information and work cooperatively to provide a safe, secure, and enjoyable environment for all residents. Public Safety staff attend monthly meetings with Police officials and Probation & Parole staff at each district. The Chief of Public Safety is a member of the Homicide Review Commission which meets monthly and was created by Mayor Barrett to try and find ways to reduce homicides. The Chief of Public Safety is also a member of the Milwaukee County Law Enforcement Executives Association (MCLEEA) which meets monthly. The primary purpose of MCLEEA is to foster cooperation among Law Enforcement Administrators within Milwaukee County.

The Housing Authority's Public Safety staff has an excellent working relationship with other law enforcement agencies and has signed Memorandums of Agreement (MOAs) with the Milwaukee Police Department (MPD), Milwaukee Sheriff's Department, U.S. Attorney General's Office Department of Justice Eastern District of Wisconsin, the Federal Bureau of Investigation (FBI), Drug Enforcement Agency (DEA), U.S. Marshal Service, and the State of Wisconsin Department of Corrections – Probation and Parole.

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 2022 or 2023 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.

Pet Policy

No changes. Residents of public housing highrise general occupancy developments are permitted to keep pets with written permission from HACM. The privilege may be revoked at any time subject to HACM’s grievance procedure if the animal becomes destructive, a nuisance, or a health or safety hazard to the other residents. For other general occupancy public housing developments, dogs and cats are permitted only in the scattered sites that are single-family homes as opposed to rowhouses or duplexes. Details of the HACM pet policy are available at all administrative offices and housing development offices.

Asset Management

The HACM will continue to maintain compliance with the Asset Based Management regulations. The continued underfunding in operating subsidy and increasing cost of operations due to the pandemic and current economic conditions, resulted in an operating deficit for most of the AMP units. We will continue to evaluate the impact of the Resiliency Plan implemented in 2015 on the delivery of services and the long-term fiscal sustainability of the AMPs. Automated information systems are in place to provide executive management and property managers with online-real time reports that can be used to effectively manage the AMPs. In addition, management will continue to conduct operational reviews in some of our core business processes to increase efficiency and reduce operating cost.

The HACM will continue to use 25% Capital fund Program (CFP) to supplement operating subsidy and will request waiver to use CFP to pay for public safety operations. CFP will also be used for comprehensive employee training and development, eligible resident services activities, eligible resident self-sufficiency programs, and continued implementation of Section 3 opportunities. HACM expects to use CFP and other private and federal grants for construction of new units, major rehabilitation, energy efficiency, and to address long-term deferred maintenance items on the properties. In conjunction with the planned conversion under the Rental Administration Demonstration

(RAD) program, HACM will evaluate the fiscal and physical viability of each AMP under the Public Housing Portfolio for effective repositioning.

Substantial Deviation/Significant Amendment

No Changes.

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 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 other 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.

B.2 New Activities

HOPE VI or Choice Neighborhoods:

The HOPE VI grant program does not have current funding from HUD. HACM received six HOPE VI grants between 1992 and 2008 for Hillside Terrace, Parklawn, Lapham Park/Townhomes at Carver Park, Highland Park (Highland Homes/Highland Gardens, Scattered Sites I, and Scattered Sites II. These six grants are fully expended and completed.

There is a 2014-15 CNI grant currently in progress to transform the Westlawn Gardens neighborhood.

Marquette University was previously awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. College Court (WI002000011) is a public housing highrise with 251 units in two towers. However, College Court is not currently eligible for a CNI Implementation grant on its own.

Currently, there are no public housing properties that by themselves are eligible for a new Choice Neighborhood Implementation grant. HACM will continue to advocate with Congress and HUD to update and revise these restrictions on CNI grants.

If this is changed by Congress and HUD, HACM would consider applying as applicant or co-applicant for a 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.

HACM may also apply for CNI Planning or Implementation grant for Hillside Terrace (WI00200001) when the NOFA eligibility allows it. Hillside has 470 units of public housing that received HOPE VI grant in 1992 (about 30 years ago). These public housing units are in need of capital to address deferred maintenance and functional obsolescence.

HACM will continue to monitor CNI grant guidelines and, if those guidelines are revised for eligibility by HUD, would evaluate the following public housing developments for any possible opportunities as a CNI target development for an implementation or planning grant:

| Asset Management Property (AMP) | Property | Office Address | Units |
|---------------------------------|------------------------------|-----------------------------|-------|
| WI002000013 | ARLINGTON COURT | 1633 N. Arlington Pl. | 230 |
| WI002000011 | COLLEGE COURT | 3334 W. Highland Blvd. | 251 |
| WI002000019 | LINCOLN COURT | 2325 S. Howell Ave. | 110 |
| WI002000015 | LOCUST COURT | 1350 E. Locust St. | 230 |
| WI002000017 | MITCHELL COURT | 2600 W. National Ave. | 100 |
| WI002000062 | RIVERVIEW | 1300 E. Kane Place | 180 |
| WI002000007 | PARKLAWN | 4434 W. Marion St. | 380 |
| WI002000001 | HILLSIDE TERRACE | 1419 N. 8 th St. | 470 |
| WI002000010 | SCATTERED SITES-MILWAUKEE | 5003 W. Lisbon Ave | 61 |
| WI002000061 | SCATTERED SITES-SOUTH | 5003 W. Lisbon Ave. | 64 |
| WI002000016 | SCATTERED SITES-NORTH & WEST | 5003 W. Lisbon Ave. | 144 |

| Asset Management Property (AMP) | Property | Office Address | Units |
|--|-------------------------------------|-----------------------|--------------|
| WI002000060 | SCATTERED SITES – HIGHLAND HOMES | 5003 W. Lisbon Ave. | 56 |
| WI002000063 | SCATTERED SITES- CHERRY | 5003 W. Lisbon Ave. | 70 |

Mixed Finance Modernization and Development:

HACM will continue to submit for future phases of affordable and market rate housing at Westlawn Development and for the AMPs identified in the RAD conversion program.

Current award statuses include:

- Westlawn Renaissance V for 44 units, including 20 reserved for youth aging out of foster care (2021 9% Low Income Housing Tax Credit award) closed in July 2022 with an estimated completion date of December 2023.
- Westlawn Renaissance VII for 97 units (2021 4% Low Income Housing Tax Credit award) closed in July 2022 with an estimated completion date of December 2023.
- Townhomes at Carver Park (122 total units, 102 of them tax credit) (2021 9% Low Income Housing Tax Credit award) closed in July 2022 with an estimated completion date of December 2023.

In late 2022 or in 2023, HACM intends to submit to the Wisconsin Housing & Economic Development Authority (WHEDA) the following applications for Low Income Housing Tax Credits to continue mixed finance modernization and development:

- Highland Gardens (114 units)
- Cherry Court (120 units)
- Convent Hill (80 units)
- Convent Hill tower (The Caroline) – workforce housing new construction

Demolition and/or Disposition:

Potential disposition activities (other than already described under the RAD section) that HACM intends to submit for approval by the U.S. Department of Housing & Urban Development shall include the following:

Disposition of community buildings at Parklawn to Central City Cyberschool (AMP WI002000007):

Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. The discussions are in progress and terms have not yet been finalized.

Disposition of Vacant Land at 6001 West Silver Spring Avenue for Market Value (AMP WI002000002):

HACM is continuing discussions with a potential private buyer regarding the sale/disposition by HACM of .532 acres of vacant land on the northeast corner of Westlawn Gardens, at 6001 West Silver Spring Drive 60th Street and Silver Spring Drive, for retail/commercial purposes. The proposed use is in compliance with the general plan development for Westlawn Gardens and the sale shall be at appraised value for the property. While we have disposition approval from HUD at this time, we are still finalizing the sale with the proposed buyer.

Disposition of Vacant Lots (AMPs WI002000010—Scattered Sites Milwaukee; WI002000016—Scattered Sites North & West; WI002000060—Highland Homes; WI002000061—Scattered Sites South; and WI002000063—Cherry Court Scattered Sites): HACM owns approximately 75 vacant lots in the City of Milwaukee. HACM is exploring the potential sale/disposition of these lots back to the City of Milwaukee or to some other entity.

Disposition of Scattered Sites units (AMPs WI002000010—Scattered Sites Milwaukee; WI002000016—Scattered Sites North & West; WI002000060—Highland Homes; WI002000061—Scattered Sites South; and WI002000063—Cherry Court Scattered Sites): HACM owns approximately 350 scattered sites homes. HACM is exploring the potential sale/disposition of scattered sites homes under Section 18. As recommendations are made, HACM will follow the Section 18 requirements on resident and local government consultation.

Disposition of Buildable Lots for Market Rate Housing at Westlawn Gardens (AMP WI002000070): As part of the 2010 Westlawn Master Plan and the Choice Neighborhood Transformation Plan, HACM had set aside land at Westlawn for the potential creation of market rate housing. We anticipate disposition on a number of buildable lots for this market rate housing. Details on the number of lots and the potential types of housing are still being developed.

Designated Housing for Elderly and/or Disabled Families:

In October 2021, HACM was notified by HUD that HACM's Designated Housing Plan had expired in June 2021 and that HACM did not submit an extension request by the deadline. The Designated Housing Plan designated units in HACM's public housing highrises for elderly families or mixed families (elderly and/or disabled). Since this Plan had expired in June 2021 without renewal, HACM's highrises are currently designated by HUD as general occupancy (for any eligible households) and are not restricted to elderly or mixed (elderly or disabled households). Thus, the wait list for these units are currently open to any household eligible for the bedroom size.

HACM plans to evaluate, develop and submit a new Designated Housing Plan for the six remaining public housing highrises (Arlington Court, College Court, Lincoln Court, Locust Court, Merrill Park, Mitchell Court, and Riverview) in early 2023. The buildings will remain as "general occupancy" until HUD has approved a new Designated Housing Plan.

Conversion of Public Housing to Tenant-Based Assistance:

No new activities.

Conversion of Public Housing to Project-Based Assistance under RAD:

As of July 2022, HACM has RAD CHAP authority under a Portfolio Award for the following properties:

| AMP | Property | Office Address | Units | Type |
|-------------|------------------|------------------------------|-------|------|
| WI002000046 | CARVER PARK, LLC | 1901 N. 6 th Ave. | 51 | PBV |
| WI002000070 | WESTLAWN | 6419 W. Custer Ave. | 374 | PBV |

The Housing Authority of the City of Milwaukee (HACM) is working to transform the Westlawn Gardens neighborhood into an inclusive community of opportunity with quality housing, schools, businesses, services and amenities where people want to live, learn, work, shop and play. HACM received a Choice Neighborhoods Implementation (CNI) grant in 2015 from the U.S. Department of Housing and Urban Development (HUD) to revitalize the housing formerly known as Westlawn West under the Rental Assistance Demonstration (RAD) Program.

The 394 Public Housing units at Westlawn West were demolished between 2016- 2017 and HACM has been rebuilding new units in phases. HACM has made a significant deviation from our 2021 Agency Plan in order to identify additional financing options for the Westlawn West housing. This will include the election of what HUD refers to as a “de minimis reduction” to convert 5% (20 units) of replacement RAD project-based voucher units at Westlawn West into regular project-based voucher units. This means there will be no reduction of the total number of subsidized units. HACM is choosing this option because the subsidy income from regular project-based voucher units is higher than that from RAD project-based voucher units. Like many other public housing authorities nationwide, HACM is facing budget challenges and it needs to seek the highest subsidy in order to maintain the housing development.

HACM may submit RAD Applications in the future for the following AMPs:

| AMP | Property | Office Address | Units | Type |
|-------------|----------------------------------|-----------------------------|-------|------|
| WI002000013 | ARLINGTON COURT | 1633 N. Arlington Pl. | 230 | PBV |
| WI002000017 | MITCHELL COURT | 2600 W. National Ave. | 100 | PBV |
| WI002000007 | PARKLAWN | 4434 W. Marion St. | 380 | PBV |
| WI002000062 | RIVERVIEW | 1300 E. Kane Place | 180 | PBV |
| WI002000010 | SCATTERED SITES - MILWAUKEE | 5003 W. Lisbon Ave. | 61 | PBV |
| WI002000061 | SCATTERED SITES- SOUTH | 5003 W. Lisbon Ave. | 64 | PBV |
| WI002000011 | COLLEGE COURT | 3334 W. Highland Blvd. | 251 | PBV |
| WI002000001 | HILLSIDE TERRACE | 1419 N. 8 th St. | 470 | PBV |
| WI002000019 | LINCOLN COURT | 2325 S. Howell Ave. | 110 | PBV |
| WI002000015 | LOCUST COURT | 1350 E. Locust St. | 230 | PBV |
| WI002000060 | SCATTERED SITES – HIGHLAND HOMES | 5003 W. Lisbon Ave. | 56 | PBV |
| WI002000063 | SCATTERED SITES- CHERRY | 5003 W. Lisbon Ave. | 70 | PBV |
| WI002000016 | SCATTERED SITES North & WEST | 5003 W. Lisbon Ave. | 144 | PBV |

In addition to RAD conversions, HACM will continue to evaluate future public housing repositioning options to include but may not be limited to Section 18 demolition disposition and RAD/Section 18 Blend.

Occupancy by Over-income Families –

No new activities.

Occupancy by Police Officers –

No new activities.

Non-Smoking Policies:

No new activities. In accordance with HUD’s final rule on “Instituting Smoke-Free Public Housing” and HUD Notice PIH 2017-3, HACM instituted a new non-smoking policy in 2018 prior to HUD’s deadline of July 31, 2018. The new policy was developed, approved and distributed with an effective date of July 1, 2018. It not only impacted public housing developments, but also applied to HACM’s mixed finance developments developed with low-income housing tax credits.

Project-Based Vouchers:

Consistent with HACM’s plan to increase affordable housing units, HACM may project-base Housing Choice Vouchers for units owned by the Authority, 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 issuance of these vouchers.

Marquette University and Near West Side Partners (NWSP) have been working on a transformation plan under a Choice Neighborhood Planning grant during 2019-2021. HACM is working with the City of Milwaukee, Near West Side Partners and Marquette University on possible Choice Neighborhood Implementation (CNI) grant in the future. The Housing Plan, an output of the Planning Grant, includes a goal to, “...Replace severely distressed public and assisted housing with high-quality mixed-income housing that is well-managed and responsive to the needs of the surrounding neighborhood...”.

In 2021, HACM issued a Request for Proposals for Project-Based Vouchers from property owners and/or developers who would like to attach federal subsidies for new construction or existing unsubsidized units, which could include housing being rehabbed or adaptive reuse of existing structures for residential housing developments eligible for project based vouchers, to support the Near West Side Partners (NWSP) Housing Plan. After review of the RFP, HACM awarded 200 Project-based Vouchers to qualified developments and will finalize those during 2022-23.

Units with Approved Vacancies for Modernization:

In accordance with 24 CFR §990.145(a)(1), HACM received approval from the local HUD office to place public housing units into the Undergoing Modernization sub-category. HACM anticipates it will make a similar request in 2023.

Other Capital Grant Programs (i.e. Capital Fund Community Facilities Grants or Emergency Safety and Security Grants):

The Housing Authority used a 2018 Emergency Safety and Security grant to modernize and install additional cameras in the Hillside Terrace, Parklawn and Westlawn Gardens developments. HACM will apply for an Emergency Safety and Security Grant in 2022.

The Housing Authority has applied for a 2022 Capital Fund Emergency Safety and Security grant in the amount of \$250,000 to install security capital needs such as cameras, etc. at Arlington Court, College Court, Lincoln Court, Locust Court, Mitchell Court, and Riverview. The grant is awarded by lottery and HUD will inform applicants of who was awarded a grant in late 2022. If unsuccessful, HACM will reapply in 2023.

In addition, HACM will apply in 2022 for a Capital Fund At Risk/Receivership/Substandard/Troubled grant program for \$3,500,000 to do much-needed capital repairs for the units in the WI002000016 Scattered Sites North & West housing development. If unsuccessful, HACM will reapply in 2023 if HUD funds additional grants.

B.3 Progress Report.

For all Annual Plans following the submission of the first Annual Plan, the PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan.

2.1 Implement Rental Assistance Demonstration (RAD) whenever feasible.

Objectives by year:

2020

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

2021

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

2022

1. Estimated RAD Closing for Townhomes at Carver Park in July 2022

2023

1. Continue predevelopment activities for the Hillside Terrace revitalization

2024

1. 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.

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

Objectives by year:

2020

1. Close and start construction of Phase 4B – 138 units of townhomes (136 RAD project-based voucher replacement units and 2 units LIHTC-only).
2. 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).
3. Apply for 4% tax credit for Phase 4C -62 units (breakout to be determined)
4. 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.
5. Education: Continue to work with Milwaukee Public Schools and Carmen to implement educational strategies towards increasing the percentage of children in neighborhood schools.
6. 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

1. 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.
2. Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
3. 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

1. Complete CNI/RAD financial closing and start construction of Phase 4A – 79 units (breakout to be determined)
2. Complete CNI/RAD financial closing and start construction of Phase 4C -62 units (breakout to be determined)
3. Complete CNI/RAD financial closing and construct commercial/retail amenities – one project
4. Complete CNI/RAD financial closing and start construction of town-house market rate housing
5. 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.
6. Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
7. 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

1. Complete Construction of WRV in December 2023.
2. Complete CNI Financial Closeout with HUD September 2023
3. 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.
4. Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
5. Neighborhood: Complete the Critical Community Improvement activities for the Westlawn CNI.

2024

1. Complete Construction of WRVII in March 2024
2. Work with neighborhood partners to promote and transition the success of Choice Neighborhood, People and Education initiatives. long-term.
3. Complete relocation of Westlawn West Residents back to Westlawn Gardens
4. 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, 76th 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, 76th Street Plaza and other businesses; and implementation work on the Placemaking projects.

2022 Progress Report

- Complete construction of WRIV Beech and Chestnut @ Westlawn Gardens in April 2022.
- Complete 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 |
|--|--------------|-----------------|
| 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 completion in December 2023.

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

| Unit Type | Bedroom Size | Number of Units |
|--|--------------|-----------------|
| 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 |
| Total Units | | 97 |

- 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 schedule 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.

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

- Develop and implement plan for ultimate disposition of the following Scattered Sites AMPs, whether through preservation with project-based vouchers, Homeownership, or disposition in partnership with non-profits:
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.

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.

2.5 Maximize Section 8 voucher utilization rate.

Objectives by year:

2020

1. Issue solicitation for PBV allocation.
2. Create and operationalize organization, system and process for a dedicated PBV administration unit under the Rental Assistance Program.
3. Implement effective reporting and matrix reporting tools to property track leasing performance.
4. Implement changes in the VMS reporting responsibilities to enhance accountability.

2021

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

2022

1. Under HUD oversight, work to implement a plan to improve HAP utilization. See detailed plan under 2021 Progress report below.
 - a. For the Housing Choice Voucher program, current utilization is 68% and our goal is to eventually improve it to 90%.
 - b. For the Project-based Voucher program, the current utilization is 87% and our goal is to eventually improve it to 98%.
 - c. 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's goal is to maintain utilization at approximately the same number as at the end of 2023.

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:

1. Hiring and redeployment of staff, including:
 - a. 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.
 - b. 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.
 - c. A team of seven workers has been assigned to focus on Annual reexaminations, Adjustments and PIC data clean-up.
 - d. A team of 2 Lease and Contract Specialists are conducting follow-up calls to participants with issued vouchers but not leased-up.
 - e. 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.
 - f. A team of 2 is dedicated to the Waiting list mailings and processing background check responses.
2. Implement changes to policy and/or procedures to improve efficiency and effectiveness, including:
 - a. 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.
 - b. All the RAD/Project Based Developments (HACM Owned and Partnering Agencies) have been all centralized with the RAD team.
 - c. The RAD team has scheduled on-site visits to housing developments to complete annual reexams and obtain signed leases.
 - d. Virtual Inspections are currently being conducted and field inspections will resume next month (as needed for those that are being challenged with technology).
 - e. 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.
 - f. 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 .
 - g. 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.
 - h. Informal Hearings are being conducted virtually.
 - i. 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.
 - j. 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.
 - k. 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.
 - l. 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.

- m. 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.
- n. Implemented a limited homeless preference for the Housing Choice Voucher program.

3. 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:

- a. Portability – begin administering vouchers to develop new revenue streams.
- b. Reassign staff – reassign eligibility staff to address long-term operational needs related to Recertifications, Interims, Unit Transfers, etc.
- c. 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.
- d. 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

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

Objectives by year:

2020

1. Implement all actions committed in the Corrective Action Plan
2. Regain Standard Performer Status in HUD's Public Housing Assessment System (PHAS)
3. Optimize Yardi System's management tool capabilities

2021

1. Ensure all actions committed in the Corrective Action Plan are continued
2. Continue actions to ensure Standard Performer Status in PHAS
3. Optimize Yardi System's management tool capabilities

2022

1. Ensure all actions committed in the Corrective Action Plan are continued
2. Continue actions to ensure Standard Performer Status in PHAS
3. Optimize Yardi System's management tool capabilities
4. 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

1. Ensure all actions committed in the Corrective Action Plan are continued and close out of the Recovery Plan
2. Optimize Yardi System's management tool capabilities including launching online applications, recertifications and resident portals for rent statements and work order requests.
3. Deploy capital investments in public housing to improve REAC scores

2024

1. Optimize Yardi System's management tool capabilities including launching executive dashboard
2. 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.

2.7 Continue to implement programs for Self Sufficiency.

Objectives by year:

2020

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

2021

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

2022

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

2023

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

2024

1. With input from the Executive Director and Board of Commissioners, determine the best structure over resident services/self sufficiency
2. Identify and procure an online giving tool and customer relationship software tool
3. Prepare promotional material for the new nonprofit or entity
4. Design the website for the new nonprofit or entity
5. Create a fundraising plan for the new nonprofit or entity
6. Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
7. 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 continues.

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

Objectives by year:

2020

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

2021

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

2022

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

2023

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

2024

1. 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 2nd 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.

2.9 Increase HACM's Mixed Income-Mixed Use Real Estate Portfolio.

Objectives by year:

2020

1. Close financing of Convent Hill South Project
2. Parklawn Cyber School and YMCA building disposition
3. 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.
4. Apply for CNI Planning grant for Hillside
5. 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

1. Pre-development Planning for Arlington, Riverview and Locust Court AMP preservation and revitalization
2. 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

2.10 Implement Choice Mobility Initiatives.

Objectives by year:

2020

1. 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.
2. 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

1. 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).
2. 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

1. 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).
2. 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

1. 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).
2. 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.
3. Continue to evaluate and revise promotional and informational materials regarding Choice Mobility, if needed, with the goal to improve these materials.

2024

1. 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.
2. 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 grant.

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 |
|------------------------------------|------------|----------|
| # Families enrolled | 242 | 280 |
| From HACM | 214 | |
| From Milwaukee County Housing Auth | 27 | |
| From Waukesha Housing Auth | 1 | |
| # Families in Program Group | | 200 |
| From HACM | 106 | |
| From Milwaukee County Housing Auth | 12 | |
| From Waukesha Housing Auth | 1 | |
| # Families in Control Group | | 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.

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

Objectives by year:

2020

1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. 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.
3. Submit for a CNI Planning grant for Hillside Development.
4. Apply for Housing Trust Fund grants as needed.

2021

1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. 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.
3. Submit for a CNI Planning grant for Hillside Development.
4. Apply for Housing Trust Fund grants as needed.
5. Review other possible grants to apply for, including supportive service grants.

2022

1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. 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.
3. Apply for Housing Trust Fund grants as needed.
4. Review other possible grants to apply for, including supportive service grants.
5. 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

1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. 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 housingAMPs or any other assisted housing developments in the area as target housing developments.
3. Apply for Housing Trust Fund grants as needed.
4. Review other possible grants to apply for, including supportive service grants.
5. 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

1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. 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 housingAMPs or any other assisted housing developments in the area as target housing developments.
3. Apply for Housing Trust Fund grants as needed.
4. Review other possible grants to apply for, including supportive service grants.
5. 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 Renaissance 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.

2.12 Develop/Implement Comprehensive Housing Plan

Objectives by year:

2020

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

2021

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

2022

1. Submit regulatory waivers whenever possible.

2. Submit application for Moving to Work or its successor program.
1. 2023 Submit regulatory waivers whenever possible.
2. Submit application for Moving to Work or its successor program.

2024

1. Submit regulatory waivers whenever possible.
2. 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.

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).

HACM continues 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.

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.

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

1. Redesign business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
2. Procure PPE (personal protective equipment) to assist with objective #1.

3. 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

1. Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
2. Continue to procure PPE (personal protective equipment) to assist with objective #1.
3. 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

1. Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
2. 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

1. Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
2. 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

1. Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
2. 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

B.4 Capital Improvements. Include a reference here to the most recent HUD-approved 5-year Action Plan (HUD 50075.2) and the date that it was approved by HUD.

See HUD Form- 50075.2 approved by HUD on 11/15/21, which is attached.

In addition, HACM plans to submit a new 5 Year Action Plan for the years 2023 to 2027.

B.5 Most Recent Fiscal Year Audit

While it was an unqualified opinion from the auditors, the most recent Fiscal Year Audit of HACM (calendar 2020) had one finding regarding internal controls. During audit fieldwork, the auditors noted one area with a lack of internal controls over the year-end financial reporting process which was considered a material weakness.

A material journal entry was discovered during the course of the audit related to schedule of expenditures and federal awards. In addition, material misstatements in the general ledger were identified during the financial audit, including a restatement to the beginning of year net position to correct prior year grant revenues that were missed. Thus, not all material transactions were recorded prior to the audit.

The Housing Authority noted that all journal entries are reviewed and approved by the Finance Director. Staff will continue to review notes receivable and payable balances that are to be eliminated for financial reporting to ensure they are fully recorded by the time final audit fieldwork commences. As far as it concerns prior year grant expenses, HACM will endeavor to draw funds monthly but are sometimes delayed because the funds are not released. The HACM Accounting Team will need to be more cognizant of prior year's expenditures and that the reimbursement is requested as timely as possible so the revenue is recognized in the right year.

C. Other Documents and/or Certification Requirements.

C.1. Resident Advisory Board (RAB) Comments.

RAB comments on the Agency Plan is included as Attachment D.

C.2 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*

See Attachment E.

C.4. Challenged Elements

Any comments or challenges from the public are documented and included as Attachment F.

C.5. Troubled PHA.

HACM is not a troubled PHA.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1. Affirmatively Furthering Fair Housing (AFFH)

HACM is not yet required to submit an Assessment of Fair Housing, therefore this is not applicable.

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **HOPE VI or Choice Neighborhoods.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

☐ **Mixed Finance Modernization or Development.** **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

☐ **Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and **2)** A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission; **5)** the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: **(1)** There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; **(2)** The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; **(3)** The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; **(4)** The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and **(5)** The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may

incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.505\)](#) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan [\(24 CFR §903.7\(b\)\)](#).

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. [\(24 CFR §903.7\(r\)\(1\)\)](#)

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section [\(24 CFR §903.7\(g\)\)](#). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. [\(24 CFR §903.7\(p\)\)](#)

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. [\(24 CFR §903.13\(c\), 24 CFR §903.19\)](#)

C.2 Certification by State or Local Officials. 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. [\(24 CFR §903.15\)](#). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. [\(24 CFR §903.7\(o\)\)](#).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." [\(24 CFR §903.9\)](#)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless , the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours 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.

Privacy Act Notice. 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.