

**TAB**

**2024**  
**Agency Plan**  
**HUD-50075-ST**

<b>Annual PHA Plan</b> <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>01/2024</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>2,330</u>      Number of Housing Choice Vouchers (HCVs) <u>7,692</u></p> <p>Total Combined Units/Vouchers <u>10,022</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission    <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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><b>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, and the draft of the 2024 Annual PHA Plan on its website, <a href="http://www.hacm.org/">http://www.hacm.org/</a> for public review. In addition, a copy is located at HACM's main office at 809 N. Broadway, 3<sup>rd</sup> Floor, Milwaukee, WI 53202.</b></p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">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> </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:																	
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B.	Plan Elements
B.1	<p><b>Revision of Existing PHA Plan Elements.</b></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 checked="" type="checkbox"/> <input 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><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><b>Statement of Housing Needs and Strategy for Addressing Housing Needs:</b> Waitlist information was updated to July 2023 info.</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection and Admission:</b> Updated for information regarding any revisions to the ACOP and Administrative Plan and have attached a Deconcentration Policy. Additional attachment summarizing the changes.</p> <p><b>Financial Resources:</b> This info has been updated based on most current information.</p> <p><b>Grievance Procedures:</b> This info has been updated as part of the Resident Handbook.</p> <p><b>Homeownership Program:</b> Updated for 2023 outcomes</p> <p><b>Community Service and Self-Sufficiency Plan:</b> Minor edits to Choice Neighborhood Case Management, Jobs Plus, and Youthbuild sections</p> <p><b>Safety and Crime Prevention:</b> Minor edits for VAWA training in 2023 or 2024</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p><b>New Activities.</b></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 type="checkbox"/> <input checked="" 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 type="checkbox"/> <input checked="" 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 type="checkbox"/> <input checked="" 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><b>Progress Report.</b></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>

B.4	<p><b>Capital Improvements.</b> 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><b>Most Recent Fiscal Year Audit.</b></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 63.</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> <b>Attachment D</b></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><b>Certification by State or Local Officials. Attachment E</b></p> <p><a href="#">Form HUD-50077-SL</a>, <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><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></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. <b>Attachment F</b></p>
C.4	<p><b>Challenged Elements.</b> 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. <b>Attachment G</b></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><b>Troubled PHA.</b></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 checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: See page 64 of 68.</p>

**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing (AFFH).**

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.

<b>Fair Housing Goal:</b>
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

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<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

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<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

## 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 improve and 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 considering 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 statuses of waiting lists as of July 2023. Please note that HACM has combined the two general occupancy wait lists (one that was previously for "family" developments and one that was previously for "highrise/midrise" developments) into one "Public Housing General Occupancy" waitlist. With the lapse of HACM's previous designated housing plan, these are both considered public housing general occupancy and the 2 waiting lists are treated as one consolidated general occupancy wait lists when wait list pulls are conducted.

### 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	20,142		500-600
Extremely low income <=30% AMI	16,683	82.8%	
Very low income (>30% but <=50% AMI)	2,851	14.2%	
Low income (>50% but <80% AMI)	516	2.6%	
Families with children	6,839	34.0%	
Elderly families (62+)	1,095	5.4%	
Families with Disabilities	6,223	30.9%	
Race - White	3,666	18.2%	
Race – Black	16,851	83.7%	
Race – Asian/Other	1,023	5.1%	
Ethnicity – Hispanic	1,846	9.2%	

Characteristics by Bedroom Size (Public Housing Only)

1BR	13,109	65.1%	
2 BR	3,615	17.9%	
3 BR	2,305	11.4%	
4 BR	939	4.7%	
5 BR	149	0.7%	
5+ BR	25	0.1%	

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	11,966		600
Extremely low income <=30% AMI	9,647	80.6%	
Very low income (>30% but <=50% AMI)	1,972	16.5%	
Low income (>50% but <80% AMI)	286	2.4%	
Families with children	5,219	43.6%	
Elderly families	658	5.5%	
Families with Disabilities	2,939	24.6%	
Race-White	2,577	21.5%	
Race-Black	9,660	80.7%	
Race-Asian/Other	708	5.9%	
Ethnicity – Hispanic	1,278	10.7%	

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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Cherry Court)**  
 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	2,905		
Extremely low income <=30% AMI	2,635	90.7%	
Very low income (>30% but <=50% AMI)	211	7.3%	
Low income (>50% but <80% AMI)	44	1.5%	
Families with children	105	3.6%	
Elderly families	269	9.3%	
Families with Disabilities	1,775	61.1%	
Race-White	597	20.6%	
Race - Black	2,343	80.7%	
Race—Asian/Other	145	5.0%	
Ethnicity – Hispanic	214	7.4%	

Characteristics by  
Bedroom Size (Public  
Housing Only)

1BR	2,905	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)?  No  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?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No

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"/> <b>Project-Based Section 8 Site-Based (Highland Gardens)</b>			
<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	4,520		
Extremely low income <=30% AMI	4,080	90.3%	
Very low income (>30% but <=50% AMI)	363	8.0%	
Low income (>50% but <80% AMI)	58	1.3%	
Families with children	676	15.0%	
Elderly families	468	10.4%	
Families with Disabilities	2,568	56.8%	
Race -White	934	20.7%	
Race -Black	3,623	80.2%	
Race -Asian/Other	241	5.3%	
Ethnicity – Hispanic	359	7.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	3,731	82.5%	
2 BR	789	17.5%	
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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Convent Hill)**  
 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	4,431		
Extremely low income <=30% AMI	3,922	88.5%	
Very low income (>30% but <=50% AMI)	408	9.2%	
Low income (>50% but <80% AMI)	85	1.9%	
Families with children	108	2.4%	
Elderly families	734	16.6%	
Families with Disabilities	2,859	64.5%	
Race -White	1,191	26.9%	
Race - Black	3,286	74.2%	
Race -Asian/Other	253	5.7%	
Ethnicity- Hispanic	387	8.7%	

Characteristics by  
Bedroom Size (Public  
Housing Only)

1BR	4,431	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)?  No  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?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No

Yes

**Housing Needs of Families on the Waiting List**

Waiting list type: (select one)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Lapham Park)**  
 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	2,935		
Extremely low income <=30% AMI	2,628	89.5%	
Very low income (>30% but <=50% AMI)	243	8.3%	
Low income (>50% but <80% AMI)	48	1.6%	
Families with children	416	14.2%	
Elderly families	274	9.3%	
Families with Disabilities	1,597	54.4%	
Race -White	613	20.9%	
Race--Black	2,372	80.8%	
Race -Asian/Other	153	5.2%	
Ethnicity- Hispanic	222	7.6%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	2,448	83.4%	
2 BR	487	16.6%	
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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Olga Village)**  
 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	4,144		
Extremely low income <=30% AMI	3,711	89.6%	
Very low income (>30% but <=50% AMI)	344	8.3%	
Low income (>50% but <80% AMI)	70	1.7%	
Families with children	462	11.2%	
Elderly families	527	12.7%	
Families with Disabilities	2,593	62.6%	
Race -White	1,088	26.3%	
Race--Black	3,096	74.7%	
Race -Asian/Other	245	5.9%	
Ethnicity- Hispanic	470	11.3%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	3,575	86.3%	
2 BR	569	13.7%	
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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Holton Terrace)**  
 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	2,601		
Extremely low income <=30% AMI	2,373	91.2%	
Very low income (>30% but <=50% AMI)	190	7.3%	
Low income (>50% but <80% AMI)	29	1.1%	
Families with children	91	3.5%	
Elderly families	222	8.5%	
Families with Disabilities	1,591	61.2%	
Race -White	606	23.3%	
Race--Black	2,038	78.4%	
Race -Asian/Other	137	5.3%	
Ethnicity- Hispanic	210	8.1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	2,601	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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Merrill Park)**  
 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	2,438		
Extremely low income <=30% AMI	2,218	91.0%	
Very low income (>30% but <=50% AMI)	184	7.5%	
Low income (>50% but <80% AMI)	28	1.1%	
Families with children	85	3.5%	
Elderly families	218	8.9%	
Families with Disabilities	1,479	60.7%	
Race -White	536	22.0%	
Race--Black	1,943	79.7%	
Race -Asian/Other	130	5.3%	
Ethnicity- Hispanic	195	8.0%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	2,438	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)?  No  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?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No

Yes

### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Becher Court)**  
 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	4,012		
Extremely low income <=30% AMI	3,601	89.8%	
Very low income (>30% but <=50% AMI)	334	8.3%	
Low income (>50% but <80% AMI)	59	1.5%	
Families with children	690	17.2%	
Elderly families	393	9.8%	
Families with Disabilities	2,390	59.6%	
Race -White	1,143	28.5%	
Race--Black	2,093	72.4%	
Race -Asian/Other	240	6.0%	
Ethnicity- Hispanic	504	12.6%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	3,158	78.7%	
2 BR	854	21.3%	
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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Scattered Sites)**  
 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	11,783		
Extremely low income <=30% AMI	9,632	81.7%	
Very low income (>30% but <=50% AMI)	1,897	16.1%	
Low income (>50% but <80% AMI)	205	1.7%	
Families with children	10,669	90.6%	
Elderly families	119	1.0%	
Families with Disabilities	1,639	13.9%	
Race -White	1,943	16.5%	
Race--Black	10,177	86.4%	
Race -Asian/Other	609	5.2%	
Ethnicity- Hispanic	1,170	9.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A		
2 BR	6,962	59.1%	
3 BR	3,722	31.6%	
4 BR	955	8.1%	
5 BR	144	1.2%	
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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Victory Manor)**  
 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	3,993		
Extremely low income <=30% AMI	3,335	83.5%	
Very low income (>30% but <=50% AMI)	525	13.1%	
Low income (>50% but <80% AMI)	107	2.7%	
Families with children	254	6.4%	
Elderly families	389	9.7%	
Families with Disabilities	1,504	37.7%	
Race -White	568	14.2%	
Race--Black	3,502	87.7%	
Race -Asian/Other	243	6.1%	
Ethnicity- Hispanic	262	6.6%	

Characteristics by  
Bedroom Size (Public  
Housing Only)

1BR	3,993	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)?  No  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?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No  
 Yes

**Housing Needs of Families on the Waiting List**

Waiting list type: (select one)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Westlawn Gardens Midrise)**  
 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	4,243		
Extremely low income <=30% AMI	3,782	89.1%	
Very low income (>30% but <=50% AMI)	374	8.8%	
Low income (>50% but <80% AMI)	62	1.5%	
Families with children	202	4.8%	
Elderly families	709	16.7%	
Families with Disabilities	2,590	61.0%	
Race -White	674	15.9%	
Race--Black	3,636	85.7%	
Race -Asian/Other	211	5.0%	
Ethnicity- Hispanic	228	5.4%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	4,243	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)

- Section 8 tenant-based assistance  
 Public Housing  
 **Project-Based Section 8 Site-Based (Westlawn Gardens)**  
 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	18,924		
Extremely low income <=30% AMI	15,474	81.8%	
Very low income (>30% but <=50% AMI)	2,902	15.3%	
Low income (>50% but <80% AMI)	453	2.4%	
Families with children	9,956	52.6%	
Elderly families	437	2.3%	
Families with Disabilities	3,307	17.5%	
Race -White	2,756	14.6%	
Race--Black	16,685	88.2%	
Race -Asian/Other	973	5.1%	
Ethnicity- Hispanic	1,604	8.5%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	8,489	44.9%	
2 BR	5,942	31.4%	
3 BR	3,374	17.8%	
4 BR	934	4.9%	
5 BR	185	1.0%	
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](http://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.

### **UPDATE (JULY 2023):**

Please see the attached summary of changes to the ACOP and Admin Plan proposed for 2024.

Updated (July 2023)

**Financial Resources:**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned Amount</b>	<b>Planned Uses (for Non-Federal funds)</b>
<b>1. Federal Grants</b>		
a. Public Housing Operating Subsidy (estimated)	\$6,473,459	
b. Public Housing Capital Fund (estimated)	\$8,098,245	
c. HOPE VI Revitalization		
d. HOPE VI Demolition		
e. Annual Contributions for Section 8 Tenant-Based Assistance (estimated)	\$35,191,049	
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	\$668,427	
<b>2. Prior Year Federal Grants (unobligated funds only –list below)</b>		
Capital Fund Program (CFP) 2019	\$444,536	
Capital Fund Program (CFP) 2020	\$46,024	
Capital Fund Program (CFP) 2022	\$910,202	
Capital Fund Program (CFP)		
Capital Fund Program (CFP)		
<b>3. Public Housing Dwelling Rental Income</b>		
	\$8,861,865	
<b>4. Other Income (list below):</b>		
Section 32 Sales	-0-	Homeownership
Investment income	\$2,500	Operations
Miscellaneous income	\$488,176	Operations
<b>5. Non-Federal Sources (list below)</b>		
HACM-owned Housing	\$8,193,809	Operations
Investment income	\$109,600	Operations
Miscellaneous	\$2,541,206	Operations
<b>Total Resources</b>	<b>\$72,029,098</b>	

## **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 many 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 (ACOP)
- HACM Section 8 Administrative Plan
- HACM Employee Handbook
- HACM Procurement Policy
- HACM Deconcentration 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 Procedures are provided to assure that any Housing Authority public housing 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 public housing development locations.

In 2023, 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.

The Housing Choice Voucher program (Section 8 rent assistance) gives participant families an opportunity for an informal hearing to consider whether rent assistance program 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.

## **Homeownership Programs**

**Section 32 Homeownership:** HACM has approval from HUD to administer a Section 32 Homeownership program. Under a Section 32 program, a public housing authority (PHA) may sell all or a portion of a public housing development to eligible public housing residents or eligible non-public housing individuals. Eligible persons would be those who are low income, with an income under 80% of Area Median Income. Eligible 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 7/5/2023, 30 of those units had been sold, leaving authorization to potentially sell 10 more units under its current plan with HUD.

However, at this time, HACM has decided to put the Section 32 homeownership program on hold due to the fact that the scattered site inventory is currently fully leased and due to the community's need for more affordable rental properties in the Milwaukee metropolitan area.

**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, 273 vouchers have been converted from rental to ownership.

**Westlawn Choice Neighborhoods Implementation (CNI):** As part of the Choice Neighborhood Implementation grant, HACM has included 50 Homeownership units to be sold to eligible participants as part of the overall housing master 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 8<sup>th</sup> grade and is located at the Parklawn development. During the 2019-20 school year, the Cyberschool also started a high school program in Parklawn and so now serves children from K4 to 12<sup>th</sup> grade. In addition, the Browning Elementary School is a Milwaukee Public School (MPS) that serves children in grades K4 through the 5<sup>th</sup> grade and is attached to the Silver Spring Neighborhood Center (SSNC) in Westlawn Gardens.

**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.

**Healthcare:** HACM currently has two health clinics located in its housing developments. Located on the 2<sup>nd</sup> 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 <sup>th</sup> Street
Highland Gardens	1818 W. Juneau Ave.
Cherry Court	1525 N. 24 <sup>th</sup> Street
Convent Hill	455 E. Ogden Ave.
Westlawn Gardens (in Silver Spring Neighborhood Center)	5460 N. 64 <sup>th</sup> 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 were very limited during COVID, HACM has developed a calendar of open lab dates and times for 2023 and 2024 for these computer labs.

**Family Self Sufficiency (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 works 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 evaluated and made changes to its FSS Action Plan and policies to ensure compliance with the new HUD regulations over FSS.

**Choice Neighborhood Case Managers:** For most of the Choice Neighborhood Initiative grant program at Westlawn Gardens from 2016 to September 2023, HACM had a number of case managers funded through the CNI grant. These case managers assisted CNI households before, during and after relocation in all supportive service needs of the household, related to education, employment and healthcare. While the grant is ending in September 2023, HACM will continue to sustain some case management at Westlawn Gardens for residents that need employment assistance or connection to other resources and social services.

**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.

The Jobs Plus grant program at Hillside Terrace will be completed and ending in the latter half of 2023.

**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 revised its Section 3 Plan and policies to be in compliance with the new Section 3 regulations and is continuing to educate contractors and residents on the new regulations.

**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 (WRTP)/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.

**Youthbuild:** For a number of years, HACM has partnered with Employ Milwaukee (formerly the Milwaukee Area Workforce Investment Board) in their Milwaukee Builds program. Under that program, 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.

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.

In 2024, HACM will end its participation in the Employ Milwaukee YouthBuild training program due to the lack of vacant scattered sites housing inventory in need of significant repairs for participants to use for on-the-job construction training worksite. We will continue to refer individuals interested in the construction trades to the remaining Employ Milwaukee training sites (e.g., Milwaukee Christian Center) and WRTP/Big Step. HACM may also incorporate additional training for HACM residents in maintenance repairs as part of the @ Promise program.

**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 training 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:**

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. Public Safety Department responds to more than 10,000 calls for service annually, 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.

Public Safety has issued "no trespassing orders" to individuals that bar them from all Housing Authority property. These no-trespass orders are issued to persons that participate in illegal activities or create disturbances in HACM housing developments.

Public Safety works closely with the Milwaukee Police Department regarding drug activity at the housing developments. Staff respond to drug complaints from residents and investigate any complaints. 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/mid-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 violent crime, drug, or gang activity, and at times, HACM is involved in the coordination of the execution of search warrants by MPD.

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 2023 or 2024 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 from previous year. 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 from previous year.

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 another unforeseen significant event;
- d) Changes in the use of replacement reserve funds under the Capital Fund program in an amount equal to or greater than \$1,000,000;
- e) Material changes in regard to demolition, disposition, designation, homeownership, capital fund financing, development, mixed financing proposal or conversion activities;
- f) Any other event or activity that the Authority’s Board of Commissioners determines to be a significant amendment to the approved 5-Year Plan or Annual Plan.

## B.2 New Activities

### HOPE VI or Choice Neighborhoods

No new activities.

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:

<b>Asset Management Property (AMP)</b>	<b>Property</b>	<b>Office Address</b>	<b>Units</b>
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 <sup>th</sup> St.	470
WI002000010	SCATTERED SITES-MILWAUKEE	5003 W. Lisbon Ave	61
WI002000061	SCATTERED SITES-SOUTH	5003 W. Lisbon Ave.	64



<b>Asset Management Property (AMP)</b>	<b>Property</b>	<b>Office Address</b>	<b>Units</b>
WI002000016	SCATTERED SITES-NORTH & WEST	5003 W. Lisbon Ave.	144
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.
- Highland Gardens (114 units). This project received a 4% Low Income Tax Credit Award in 2023 and expected to close and start construction in the 3<sup>rd</sup> quarter of 2024.

In late 2023 or in 2024, HACM intends to submit to the Wisconsin Housing & Economic Development Authority (WHEDA) applications for Low Income Housing Tax Credits (LIHTC) to continue mixed finance modernization and development, which may include the following:

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

HACM will also continue to evaluate and plan for potential future modernization and development of Hillside Terrace WI002000001) as a mixed finance development.

### **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 (HUD) shall include the following:

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

HACM received disposition approval for this property, however, 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 due to funding challenges.

**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, and therefore is responsible for maintaining these vacant lots. HACM is exploring the potential sale/disposition of these lots back to the City of Milwaukee or to some other entity or entities.

**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 380 public housing 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.

**Disposition of Vacant Land at 421 E. Locust Street:** (part of AMP WI002000008 and Tax ID 3141302100) : This is land that is adjoining the Holton Terrace housing development. HACM is exploring the potential sale/disposition of this vacant outparcel for market value to be used for retail/commercial use. Specifically, HACM is looking to issue an RFP, possibly targeting a user to help provide food options to an area considered depleted of choices.

### **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 units (units that are available for any eligible households) and are not restricted to elderly or mixed (elderly or disabled) households. Thus, the separate wait list that had been in place for designated housing developments is now treated as consolidated with the other public housing general occupancy wait list and any wait list pulls are done accordingly.

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 late 2023 or 2024. 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**

HACM will continue to evaluate the feasibility and may submit RAD Applications in the future for the following AMPs:

<b>AMP</b>	<b>Property</b>	<b>Office Address</b>	<b>Units</b>	<b>Type</b>
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 <sup>th</sup> 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 165

Project-based Vouchers to qualified developments in 2022. Some projects starting to gain traction in 2023 and some have requested extension on their voucher allocation.

**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 applied for and received 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.

HACM will continue to evaluate other grant opportunities from HUD as they become available. These could potentially include the Capital Fund Emergency Safety and Security grants or other special Capital Fund grants.

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### **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. Continue predevelopment activities and explore financing plan options for Hillside Terrace

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

HACM continues to implement portfolio repositioning through the RAD program.

- Westlawn Renaissance III, Phase 2B of the Westlawn Development/CNI plan, was completed in April 2020 and occupied in July 2020 (94 units).
- Holton Terrace (2018 9% Low Income Housing Tax Credit award) estimated completion December 2020 (120 units)
- Merrill Park (120 units) was awarded a 2019 9% Low Income Housing Tax Credit award, had a financial closing in December 2019, and has an estimated completion of December 2021.
- Becher Court (120 units) was a 2019 9% Low income housing tax credit award, had its financial closing in June 2020, with an estimated completion in December 2021.
- Westlawn Renaissance VI (138 units) had its financial closing in April 2020 and an estimated completion in December 2021.
- Westlawn Renaissance IV (60 units) is pending closing in October 2020

The team is evaluating the financing structure for the remaining CHAPs and potential applications for the remaining public housing portfolio.

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

HACM continues to implement portfolio repositioning through the RAD program:

- Holton Terrace (120 units): All apartments (regular and ADA-accessible) have been completed in early 2021 and majority of the units are leased as of July 2021. Both elevators have been replaced. Community areas are being rehabbed and boiler system will be replaced, and this work should be done by September 2021.
- Merrill Park (120 units): All ADA-accessible apartments have been completed as of July 2021. Continue to work on the remaining regular apartments through 2021, including relocation of original Merrill Park residents to their new rehabbed unit. Construction is currently scheduled to be completed by end of 2021.
- Becher Terrace (120 units): Continue to work on the remaining regular and ADA-accessible apartments through 2021, including relocation of original Becher Terrace residents to their new rehabbed unit. Construction is currently scheduled to be completed by end of 2021

- HACM submitted a 9% Low income housing tax credit (LIHTC) application for Townhomes at Carver Park (122 units) in late 2020 and received an award from WHEDA in April 2021. We will submit a RAD financing plan by November 2021 with the estimated RAD closing for Carver Park in March 2022.

### **2022 Progress Report:**

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

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

### **2023 Progress Report:**

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

- Continuing to evaluate redevelopment options for Hillside Terrace Revitalization

## **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, 76<sup>th</sup> Street Plaza and other businesses; and planning work continues for Placemaking projects.

### **2021 Progress Report**

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

expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 76<sup>th</sup> Street Plaza and other businesses; and implementation work on the Placemaking projects.

## 2022 Progress Report

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

Unit Type	Bedroom Size	Number of Units
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
<b>Total Units</b>		<b>97</b>

- Secured American Recovery Plan funding from the City and State amounting to \$15mm to fill in the financing gap for the WR V and WR VII project, including additional funding for the construction of non-HUD funded rental and home ownership housing as per CNI Housing Plan.
- Construction is set to begin in July 2022 and be complete by March 2024.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return) as well as assisting residents that want to work with employment opportunities.
- Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Work to improve the neighborhood development continued as follows:
  - HACM/CNI joined with WWBIC and PNC Bank to launch Black Business Boost, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Since its launch in October 2022, over 600 applications have been received.
  - The CNI exterior revitalization grant program awarded a \$50,000 grant to the owners of Silver Spring Mall, located directly across Silver Spring Drive. Combat Corner, which was awarded a \$25,000 grant during the summer, has begun improvements to its facade. Work is moving forward on the Havenwoods Plaza, which was awarded a \$50,000 grant. Additional applications for approximately \$85,000 are under review.
  - The CNI loan fund program made several awards to businesses relocating into the CNI neighborhood or expanding in the CNI neighborhood, including:
    - A \$100,000 loan to TMP Aeronautics, a new business that established itself in the CNI neighborhood and that is a supplier to the aerospace industry.
    - A \$250,000 loan to Bert & Tom, LLC to support relocation of a beer distribution business to an empty manufacturing space and plans for a beer garden/tap room with expansion to include a restaurant and commercial kitchen. We are also considering an exterior revitalization grant to support the project.



- A \$250,000 loan to CRS Enterprises, LLC to purchase one of Milwaukee's oldest African American owned & operated social service organizations to continue those services located in the CNI neighborhood.
- o 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.
- o 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.
- o 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.
- o One of the main goals of the program is coming to fruition as a Sentry Foods grocery store is in the process of locating in the strip mall across the street from Westlawn Gardens, in the spot formerly filled by the Meat Market. This will finally bring a full-service grocery store to the neighborhood.

### 2023 Progress Report

- Construction of WR V and WR VII are on track for completion this year.
- Design and construction of 10 units non-HUD funded housing units is expected this year.
- The CNI grant will be completed in September 2023 and HACM is on track to fully expend the grant. Housing construction for final phases continues.
- People: Case management of residents continues with two case managers currently assisting target residents. This includes assistance in residents wishing to return as the final replacement units are completed in 2023, as well as those wanting assistance on finding employment/job search.
- Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Work to improve the neighborhood development continued as follows:
  - o Business Loan Program: Part of the HACM's Critical Community Improvements Plan for CNI, the Business Loan Program is a joint initiative with Wisconsin Women's Business Initiative Corporation (WWBIC). Under Milwaukee's Choice Neighborhoods Business Loan program, \$1 million in Choice Neighborhoods CCI funds was set aside for a revolving fund, which was matched with \$500,000 from WWBIC. This two-thirds/one-third split enabled the partnership to offer its loans at favorable rates, which further incentivized businesses to set up shop in the neighborhood. To date, the Business Loan Program has helped eight businesses either launch, expand or relocate into the neighborhood, created/retained 58 jobs, and spurred exponential growth and largescale economic development throughout the community.
  - o Façade Program: CNI also partnered with Milwaukee's Department of City Development to fund exterior façade revitalization efforts in the CNI neighborhood. A number of façade grants have been awarded under the program to improve the physical appearance of the neighborhood and assist local businesses with needed exterior physical improvements.
  - o Black Business Boost: HACM/CNI continues to partner with WWBIC and PNC Bank on their Black Business Boost program, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Black Business Boost is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital: Credit Recovery and Support; Technical Assistance and Training; Acceleration and Incubation; and Equity and Loan Support.
  - o Other programs: CNI has also partnered in a number of other neighborhood programs, including the Best Baby Zone healthy birth outcomes initiative and the Northwest Fresh Food Access Council.

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

## Objectives by year:

2020

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

2021

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

2022

- Reposition AMP WI002000046 Townhomes at Carver Park via RAD Conversion

2023

- Evaluate avenues for potential repositioning of other AMPs:
  - AMP WI002000013 Arlington Court
  - AMP WI002000011 College Court
  - AMP WI002000001 Hillside Terrace
  - AMP WI002000019 Lincoln Court
  - AMP WI002000015 Locust Court
  - AMP WI002000017 Mitchell Court
  - AMP WI002000007 Parklawn
  - AMP WI002000062 Riverview

2024

- Continue to evaluate avenues for potential repositioning of other AMPs via use of the Rental Assistance Demonstration Program (RAD) or the Section 18 Disposition program ( through preservation with project-based vouchers, homeownership, or disposition in partnership with nonprofit organizations):
  - AMP WI002000013 Arlington Court
  - AMP WI002000011 College Court
  - AMP WI002000001 Hillside Terrace
  - AMP WI002000019 Lincoln Court
  - AMP WI002000015 Locust Court
  - AMP WI002000017 Mitchell Court
  - AMP WI002000007 Parklawn
  - AMP WI002000062 Riverview
  - AMP WI002000063 Cherry Court Scattered Sites
  - AMP WI002000060 Highland Homes Scattered Sites
  - AMP WI002000010 Milwaukee Scattered Sites
  - AMP WI002000016 North/West Scattered Sites
  - AMP WI002000061 Southside Scattered Sites

### 2020 Progress Report:

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

### 2021 Progress Report:

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

### 2022 Progress Report:

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

### **2023 Progress Report:**

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

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

#### **Objectives by year:**

2020

- Issue solicitation for Preferred Development Partner.
- Determine ACC allocation availability for each year. Could be coupled with PBV for financial feasibility consideration for new projects.

2021

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

2022

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

2023

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

2024

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

### **2020 Progress Report:**

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

### **2021 Progress Report:**

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

### **2022 Progress Report:**

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

### **2023 Progress Report:**

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

## **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

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

2024

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

### **2020 Progress Report:**

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

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

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

### **2021 Progress Report:**

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

- Hiring and redeployment of staff, including:
  - Hired 5 Certification Specialists. These new hires include replacement of team members who have voluntarily/not voluntarily left the organization. This team has resumed working in office rather than remotely.
  - A team of four workers has been assigned to focus on New Admissions and voucher issuance. One of these Team members will be the appointed liaison for the Emergency Housing Voucher deployment.
  - A team of seven workers has been assigned to focus on Annual reexaminations, Adjustments and PIC data clean-up.
  - A team of 2 Lease and Contract Specialists are conducting follow-up calls to participants with issued vouchers but not leased-up.
  - This year the RAD/Project-based Voucher team has grown from a team of 4 to a team of 6 individuals. The added 2 team members are Clerical Assistants. This team has resumed working in the office as opposed to remotely.

- A team of 2 is dedicated to the Waiting list mailings and processing background check responses.
- Implement changes to policy and/or procedures to improve efficiency and effectiveness, including:
  - All participants with late Annual Re-examinations are being contacted via phone to be completed. HUD documents that are required to be signed and not included in the waivers are being emailed/mailed to complete and return to the program. Measurable goals have been established for this team.
  - All the RAD/Project Based Developments (HACM Owned and Partnering Agencies) have been all centralized with the RAD team.
  - The RAD team has scheduled on-site visits to housing developments to complete annual reexams and obtain signed leases.
  - Virtual Inspections are currently being conducted and field inspections will resume next month (as needed for those that are being challenged with technology).
  - The City Department of Neighborhood Services has been hired to assist with annual inspections that were waived last year and must be completed by 12/31/2021.
  - The rent reasonableness unit proximity review has expanded from 1 mile up to 5 miles to located acceptable comparables and minimize the time spent reviewing.
  - Landlords interested in participating in the program by listing their available units for program participants, are now listed on the HACM website. This list is updated every Friday.
  - Informal Hearings are being conducted virtually.
  - Background check reports have been reduced to meet the minimum HUD requirements. This has helped to minimize the review time for each applicant to be approved. In turn, the applicant is processed for eligibility and voucher issuance.
  - A Housing Navigator has been hired and is meeting weekly every Wednesday with VASH Case Workers to bridge the communication gap between the VA and RAP and increase VASH Voucher lease-up.
  - Currently under review and Yardi testing is the implantation of Small Area FMR's (SAFMRs). We want to ensure Yardi set-up is correct and accurate Payment Standards are being selected according to the established zip codes.
  - Hired a PIC coach to assist in the review of our data and reporting. This includes the Yardi conversion data clean-up for accurate VMS/PIC reporting.
  - A data sharing MOU was established with the Opportunity Milwaukee Mobility team to recruit eligible families for this program and assist in locating a unit. This will help house families more rapidly and increase lease-up.
  - Implemented a limited homeless preference for the Housing Choice Voucher program.
- Use of HUD's forecasting tool and HCV dashboard to monitor and report on progress towards goals.

### **2022 Progress Report:**

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

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

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

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

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

## 2023 Progress Report:

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

1. **HUD Field Office Review:** The first monitoring visit in October 2022 was from the Milwaukee HUD Field Office staff to follow up on progress made on actions to improve utilization and other concerns. HACM received a report on this monitoring visit on 12/29/2022.

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

- Financial Software: HACM is not using YARDI to its fullest advantage. The use of the Multiview financial software system for accounting complicates the process of accounting for the voucher program and requires additional steps and difficulty in reconciling both HAP payments and administrative fee expenses.
- Internal Controls: Lack of internal controls in the monthly HAP check run as well as in the reconciliation between the HUD Voucher Management System and the HACM accounting General Ledger amounts.
- Late Recertifications: A significant number of recertifications were processed late, including many in which HAP payments were made and charged to HAP in the current year for prior year HAP activity.
- HAP Payments to HACM: HACM was making HAP payments to itself for voucher participants in the Northlawn, Southlawn, and Berryland developments, rather than using LLCs or another entity. This is not in compliance with requirements of PIH Notice 2017-21.
- Inaccurate Data in the VMS and PIC Systems: Data reported to the VMS system and the PIC system have a number of inaccuracies. HACM needs to improve data integrity through using an improved quality control process. VMS reporting was inaccurate in places and needed to be better documented and reconciled.
- Low HAP Utilization Rates: HAP utilization rates continue to be low in both the HCV and PBV programs.
- Processes and Procedures Need Streamlining: HACM must implement a number of changes to streamline and create more efficient and effective policies and procedures to decrease processing delays that are impacting the utilization rates.
- Incomplete Documentation in Files to Verify HAP and Tenant Rent: HACM must improve: (1) compliance with HUD’s verification procedures to verify income, assets, etc., including use of the EIV system and other third-party verification; (2) filing and storage of documentation in client files so that they are readily available; (3) ensure appropriate protection of personally identifiable information.

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

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

1. **YARDI Financial Software:** Effective January 2023, HACM will be using the full YARDI suite for Section 8 [Financials-HAP and HAP related transaction and Program operations]. This will allow better audit trail and more efficient and reliable reconciliation between Yardi and HUD VMS reporting information.
  2. **Business Process Review:** HACM has engaged a YARDI consultant to perform a Business Process Review (BPM) to ensure accurate mapping of data, provide accurate reporting to HUD systems (PIC and VMS), provide a road map to optimize use of YARDI by HACM, and improve HACM's processes
  3. **Section 8 Accountant/Analyst:** HACM's Accounting Department has hired this position to focus solely on Section 8 accounting and financial reporting. This Financial & Systems Analyst position will have its top priority as stabilizing the Section 8 financial operations.
  4. **Improved Internal Controls/Segregation of Duties:** HACM has already improved internal controls, revised responsibilities to provide better segregation of duties, and made revisions to the departmental organizational structure. In addition, HACM developed a Standard Operating Procedure over Quality control that will be implemented in June 2023.
  5. **Increased Outsourcing Where Needed:** In cases where HACM does not have the immediate capacity to address issues or where a contractor brings a specialized knowledge or skill, HACM has begun to outsource services and will continue to outsource as needed. For example, HACM has hired Nan McKay to perform HCV recertifications. This will allow HACM staff to focus on correcting data integrity issues with participants in PIC and VMS and receive some intensive training. HACM will continue to look for opportunities to expand outsourcing where needed, with other potential areas that could include items such as but not limited to: tenant file reviews; SEMAP assessment/quality control reviews; FSS program administration assistance; management and organizational reviews and assessments; etc.
  6. **Staff Training:** HACM leadership in the finance and Rent Assistance divisions will be required to complete a series of assigned financial management and HCV management and financial management courses All trainings will be tracked through Yardi Aspire and HACM's Human Resources system. Trainings will include trainings provided by YARDI on specific tasks or processes in YARDI, HCV/PBV-gearred trainings from HUD Exchange, and other trainings.
- 2. Quality Assurance Division Review:** The second review was a site visit from the HUD Quality Assurance Division (QAD) in December 2022 and they performed a Financial Management Review (FMR) and a Management and Operations Review (MOR).

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

- The HACM HCV financial records and books of account could not be properly and effectively tracked, and lack an audit trail. The use of Multiview for the accounting software system rather than YARDI adds to the complexity in reconciliation between the housing software and the general ledger, as well as to data reported to HUD through VMS and PIC.

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

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

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

## 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.

### **2023 Progress Report:**

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

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

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

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

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

- Provide ongoing training for NSPIRE inspection, Wisconsin state requirements and industry standard repairs.

- Review, update and implement the existing preventative maintenance plan.
- Review inspection deficiencies in a timely matter to file appeals and when creating capital fund plan.

## 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 diversity 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.

### **2023 Progress Report:**

During 2023, the Chief Operating Officer-Program Services continued to strategize with a goal of identifying and diversifying potential sources of revenue such as grants to advance or sustain HACM's self-sufficiency programming. HACM has put the further development of the separate branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined. Work continues on identifying outcome measures and goals for supportive services as well as on procuring an online giving tool.

## **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 2<sup>nd</sup> Street Scattered Sites, 250 units at Westlawn Renaissance, 30 units at WG Scattered Sites, 60 units at Victory Manor and 94 units at Westlawn Renaissance III.

## 2023 Progress Report

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

## 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

1. 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

1. 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

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

### 2020 Progress Report:

Ongoing efforts have been made on several activities.

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

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

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

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

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

**2021 Progress Report:**

Ongoing efforts have been made on several activities.

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

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

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

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

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

**2022 Progress Report:**

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

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

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

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

**2023 Progress Report:**

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

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

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

## 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.



## 2023 Progress Report

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

HACM staff reviewed the NOFO application and program implementation requirements. Given that the current top priority for the Rent Assistance program is to implement Corrective Action Plans from HUD to improve utilization and performance, HACM Senior Management believes it unfortunately does not have sufficient capacity to apply for and implement a new mobility services program.

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

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

### 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 housing 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.

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 housing 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.

### **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.

**2023 Progress Report:**

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

Affordable Housing Program (AHP) grants: In 2023, HACM applied for an AHP grant from the Federal Home Loan Bank for Holton Terrace.

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

**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.

2023

1. 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.

**2023 Progress Report:**

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

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

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

**Objectives by year:**

2020

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

2021

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

2022

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

2023

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

2024

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

**2020 Progress Report:**

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

**2021 Progress Report:**

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

**2022 Progress Report:**

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

**2023 Progress Report:**

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

**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

### **2023 Progress Report:**

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

**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.

- The most recent version of the 2018 to 2022 Capital Fund 5 Year Action Plan (HUD Form- 50075.2) is Revision #7 approved by HUD on (date to be determined once HUD approves)
- In addition, HACM plans to submit a revised 5 Year Action Plan for the years 2023 to 2027 to respond to HUD feedback. Attached is the current version of the Capital Fund 5 Year Action Plan for 2023 to 202, but it has not yet been approved by HUD. We will update once a new revision is available.

**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 2021) had one finding regarding internal controls. A system of internal control should be in place that provides reasonable assurance that year-end financial statements are complete and accurate. A material misstatement in the general ledger was identified during the financial audit. The Authority did not have all material transactions recorded prior to the audit. The Authority's financial records maybe materially misstated before the audit is completed as a result.

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 feedback and comments on the Agency Plan is included as Attachment C. (NOTE—this will be done after the RAB has provided feedback )

### 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 D.

### C.3 Civil Rights Certification / Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. 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*

See Attachment E.

### C.4. Challenged Elements

Any comments or challenges from the public are documented and included as Attachment F. (NOTE--this will be done after the public hearing )

### C.5. Troubled PHA.

**Public Housing:** HACM's 2022 PHAS status for Public Housing is "Standard". A 2023 Updated Recovery Plan for HACM's low-income Public Housing program was submitted to the Milwaukee Field Office on May 31, 2023. One of the items on the plan is already complete and four goals are in progress.

**Rent Assistance Program:** HACM's 2022 SEMAP status for the Rent Assistance program is "Troubled".

HUD's local Field Office reduced a number of scores under SEMAP based on findings from their Site monitoring review report as well as the Quality Assurance Division's Financial Management Review and Management & Operations Review. The reduction in scores reduced the SEMAP status of the program from "Standard" to "Troubled."

HUD has requested three corrective action plans related to the rent assistance program: (1) a Corrective Action Plan in response to the HUD Field Office Site Monitoring Review report and submitted from HACM to HUD on 2/10/2023; (2) a Corrective Action Plan in response to the HUD Quality Assurance Division (QAD) Financial Monitoring Review (FMR) and Management & Operations Review (MOR) report submitted from HACM to HUD on 5/18/2023; and a Corrective Action Plan in response to the HUD Quality Assurance Division (QAD) Family Self-Sufficiency (FSS) program report submitted from HACM to HUD on 7/5/2023.

In addition, due to the "Troubled" rating on our SEMAP score, HACM was also required to prepare a Corrective Action Plan for each SEMAP score that was a zero score. This final Corrective Action Plan incorporated elements of the other plans.

HACM staff are in regularly contact with HUD staff regarding these Corrective Action Plans and are making progress toward the actions and goals that are required under them.

## 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](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](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](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 of 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.

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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.

DRAFT

**Attachment B:  
Deconcentration  
Policy  
(also found in the ACOP)**

## **HOUSING AUTHORITY OF THE CITY OF MILWAUKEE DECONCENTRATION POLICY**

HACM is committed to achieving a healthy mix of incomes in public housing developments by attracting and retaining higher income families and by working towards the goal of deconcentration of poverty.

The goal of the policy is to bring higher income tenants into lower income projects and lower income tenants into higher income projects. This policy statement covers the method for achieving deconcentration of poverty and income-mixing of public housing developments. [24 CFR 24 CFR 903.1 and 903.2]

Developments that are subject to the deconcentration requirement are referred to as “covered developments” and include general occupancy public housing developments. Per 24 CFR 903.2 (b), the following developments are not subject to deconcentration and income mixing requirements:

- Developments with less than 100 public housing units
- Mixed population developments or developments designated specifically for elderly or disabled families;
- Developments operated by a public housing authority with only one general occupancy development;
- Developments approved for demolition or for conversion to tenant-based public housing
- Developments approved for a mixed-finance plan using HOPE VI or public housing funds
- Additionally, any developments with any RAD PBV units will have all units in that development waived from the deconcentration policy. (HUD Notice PIH 2019-23)

HACM will follow these steps to determine if actions are needed, and if so, to take these steps to provide for deconcentration of poverty and income mixing. [24 CFR 903.2(c)]

1. HACM will determine the average income of all families in all covered developments on an annual basis.
2. HACM will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.
3. HACM will then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level of 30 percent of area median income).

4. If, at annual review, the average income at a covered development is outside the EIR, HACM will then determine whether or not this development is consistent with its local goals and annual plan.
5. If HACM has covered developments with an average income outside the EIR, HACM must then determine whether or not these developments are consistent with its local goals and annual plan.
6. If HACM does not provide an explanation in its annual plan regarding a covered development outside the EIR, HACM may take the following actions to provide for deconcentration of poverty and income mixing [24 CFR 903.2(c)(1)(v)]:
  - a) Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
  - b) Establishing a preference for admission of working families in developments below the EIR
  - c) Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration

If HACM has provided that a family that resided in a covered public housing development has a right to admission to a public housing unit in that development after revitalization, the requirements of this policy do not preclude fulfilling that commitment or HACM's commitment to return a family to another development after revitalization. [24 CFR 903.2(c)(3)]

A family has the sole discretion whether to accept an offer of a unit made under HACM's deconcentration policy. HACM must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under HACM's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

**Attachment D:  
C.1. RAB Hearing  
& Comments**



## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

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

**HACM Response:** For inclusion in the draft of the Agency Plan, the first deadline is near the end of July 2023, as HACM will need to compose responses to each comment. However, any RAB member can also send comments to Ken Barbeau or Samantha Kearney after that for inclusion, or can formally submit them in writing to HACM prior to the September Board of Commissioners meeting, or can attend the Public Hearing at the September Board meeting to provide comments in person. The Public Hearing is on Wednesday, September 13, 2023 at 3:00 p.m. at City Hall, Room 301-A.

### **2. Grievance Procedures: What is the status of the HACM Public Housing Grievance Board?**

**HACM Response:** HACM's Grievance Procedures require a three-member Public Housing Review Board to hear grievance appeal hearings, in cases where a pre-hearing meeting between the resident and housing management has not resolved the issue. Each board is made up of a panel with two public housing residents and one independent attorney that acts as chair of the board.

In March 2023, HACM sent letters to all Resident Organization board members of the public housing developments to obtain officers that are willing to serve on grievance review board panels. To date, 6 residents submitted a form stating that they were willing to serve. HACM will send out another request to public housing resident organization board members to see if any additional leaders are interested.

Additionally, HACM will be drafting a Request for Proposal for attorneys in the area to be considered as hearing officers.

### **3. Grievance Panel: Should the panel not be made up of 3 public housing residents only, and not an attorney?**

**HACM Response:** HUD's regulations for public housing authorities (PHAs) define a hearing officer as an impartial person or persons selected by the PHA, other than the person who made or approved the decision under review, or a subordinate of that person. HACM's current Grievance Procedures were drafted in 2005 or earlier and have required a 3 -member panel made up of 2 residents and an attorney who does not have any personal interest in the case being heard. Unless HACM's Grievance Procedures are modified, HACM must follow its policy.

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

**4. Homeownership: While the Westlawn Choice Neighborhood Plan has 50 potential homeownership units, you state that there is currently an issue with new housing construction costs being higher than the appraised value. Is HACM working with the City or other partners to address this issue?**

**HACM Response:** Yes, HACM has been working with the City to bring in neighborhood amenities that will improve the property values. HACM is trying to work with neighborhood partners to improve the type and quality of businesses in the neighborhood. One example is a new Sentry full service grocery store that will soon be opening across the street from Westlawn Gardens, an amenity that the immediate neighborhood has not had in many years. HACM may also explore ways to possibly subsidize homeownership to help to get the housing market started.

**5. Section 3: Does HACM's new Resident Ambassador program which pays stipends to housing residents count as Section 3 employment?**

**HACM Response:** HACM does not believe so, as they are not technically employees of HACM since they receive a stipend for some part-time work in the development. However, it may be viewed as a type of job training opportunity.

**6. Make Your Money Talk/IDA program: Did residents that qualified for an IDA during COVID have a second chance at getting another IDA?**

**HACM Response:** If a resident previously completed the training and opened an IDA, saved and qualified for and used the matching amount, they would not be eligible for a second IDA match. However, if they were unable to use the match the first time or did not open an IDA account the first time, they could complete the training again and save and if they use their IDA for an approved purpose, receive the match this time. They just cannot receive a matching amount twice.

**7. VAWA: Can resident leaders also receive VAWA training when HACM employees are trained?**

**HACM Response:** That is a good idea, and yes, HACM will look into providing training on VAWA for residents as well. Sojourner Family Peace Center may be approached to provide training.

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

**8. Substantial Deviation/Significant Amendment to Agency Plan: One RAB member thought the \$1,000,000 change threshold on a few items seems low. Can a RAB member suggest a different dollar amount as a threshold for triggering that a substantial deviation or significant amendment occurs?**

**HACM Response:** HACM invited the RAB member or other members to suggest an alternative dollar threshold for the specific items and HACM will review it.

**9. HOPE VI/Choice Neighborhoods: Can new construction qualify for a Choice Neighborhoods grant?**

**HACM Response:** Yes—Westlawn Gardens is an example of new construction for a CNI grant.

**10. Low Income Housing Tax Credit (LIHTC) applications: One member recommended that HACM apply for Cherry Court as one of the next LIHTC proposals when they become eligible. Other members asked about scattered sites and Parklawn, and asked what funding was available for those developments.**

**HACM Response:** HACM confirmed that Cherry Court is included in the list of priorities for the next round of LIHTC applications. For Scattered Sites, some were included in a previous HOPE VI application and so that scat site development is not eligible for Choice Neighborhood grant funding currently. Parklawn also previously received HOPE VI funding. However, they could be eligible for LIHTC funding and if they end up converting through RAD, LIHTC would probably be a source of funding of renovations.

In addition, Section 18 disposition is also a possibility as an alternative to RAD, but HACM would need to do further analysis to see what makes sense. Once HACM is ready to make a recommendation, there are a number of HUD requirements for resident communication and input into the process and local government consultation.

**11. Central City Cyberschool: Where does the sale of the buildings to the Cyberschool stand?**

**HACM Response:** As the RAB knows, this was part of last year's Agency Plan and continues this year. HACM has been negotiating with the Cyberschool over the sale of the school properties to them at a fair market value, but there have been some financing challenges which have delayed any sale. Since there has been no sale yet, HACM still owns the buildings and leases them to the Cyberschool.

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

**12. Project-Based Vouchers: HACM had put out an RFP for project based vouchers in the Near West Side. Did HACM award any project-based vouchers to Marquette University?**

**HACM Response:** No, Marquette was not one of the developers that applied for or received project-based voucher allocations from last year's RFP.

**13. Personally Identifiable Information: How does HACM secure personally identifiable information (PII) and other confidential records when contractors are around? The concern was that papers may be lying out when they are in the office.**

**HACM Response:** There are some contractors that need access to personally identifiable information as part of their work. One example of this would be a contractor that has been hired to assist HACM with performing recertifications (e.g., Nan McKay). In those cases, there are contractual provisions and federal regulations regarding confidentiality. Regarding other types of contractors such as custodial contractors, HACM staff should be securing any resident files or other PII to the greatest extent possible, including storing in locked cabinets when not actively working on the file. HACM has recently reiterated the regulations over personally identifiable information to all rent assistance employees and will also reiterate those procedures to all other staff, including those working in housing developments.

**14. Corrective Action Plans: The Agency Plan describes a number of corrective action plans in place for the rent assistance program. Is there a similar corrective action plan in place for the public housing program?**

**HACM Response:** Yes, HACM continues to have a recovery plan in place for public housing. It is described in Goal 2.6 of the Agency Plan. In April 2023, HACM received a request from HUD's Milwaukee Field Office for HACM to update its Recovery Plan to address additional conditions contributing to the Substandard PHAS score. As of April 25, 2023, HACM had two open Recovery Plan Goals; achieve and maintain a public housing occupancy rate of 97% and reduce and maintain turnaround time of vacant units to 30 days. As of May 7, 2023, our occupancy rate was 96.71%, so we are close to the goal of 97%.

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

For both of these items, new corrective action steps, as well as actions from the previous plan, are included in the HACM 2023 Updated Recovery Plan. Additional recommendations for improvement provided by HUD which have been incorporated into the Recovery Plan include;

- Provide ongoing training for NSPIRE inspection, Wisconsin state requirements and industry standard repairs.

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

- Review, update and implement the existing preventative maintenance plan.
- Review inspection deficiencies in a timely matter to file appeals and when creating capital fund plan.

**15. Housing Mobility: HACM's Agency Plan states that Metropolitan Milwaukee Fair Housing Council (MMFHC) wanted to partner on an application this year for Housing Mobility Related Services grant from HUD, but that unfortunately, HACM does not believe it currently has sufficient capacity to apply for and implement this grant program. We still have buildings and housing developments that need significant funding to redevelop them. Would these grant funds from HUD assist HACM in redeveloping these older housing developments?**

**HACM Response:** No, unfortunately this is not a housing redevelopment grant and would not provide any monies for that type of work. The Housing Mobility Related Services grant provides additional services to families in the housing choice voucher program who wish to relocate to neighborhoods of opportunity (e.g., lower crime, lower poverty neighborhoods). These services might be working as a landlord outreach, pre- and post-move support, housing search assistance, and possibly financial assistance with the security deposit for those families moving to neighborhoods of opportunity. These types of services would have been provided by MMFHC. However, this money cannot be spent on housing redevelopment or modernization.

**16. Voucher Payment Standards: You mention that voucher payment standards have increased. How so?**

**HACM Response:** Payment standards are based on HUD's Fair Market Rent (FMR), which is set annually. Housing Authorities have the ability normally to set their payment standard in a range from 90% to 110% of the fair market rent. HACM currently has requested and has HUD approval for an exception payment standard of 120% of FMR. However, payment standards are the maximum rent allowable; they are still subject to rent reasonableness in which the rent requested by the landlord must be reasonable when compared to similar unassisted units in the market area. A copy of the current FMRs and utility allowances as of 5/1/2023 is attached.

In addition, HACM has also elected to use Small Area FMRs for the following 15 zip codes in areas of opportunity: 53129, 53130, 53132, 53154, 53202, 53203, 53207, 53211, 53213, 53217, 53223, 53224, 53226, 53227, and 53228.

**17. Affordable Housing Program: One of the goals states that HACM had applied for an Affordable Housing Program grant from the Federal Home Loan Bank (FHLB) for Holton Terrace in 2023. Residents of Holton Terrace never heard of this. What was this for?**

**HACM Response:** HACM will correct this item; this was an error in our reporting on accomplishments. HACM had submitted to the donor a report on project completion for an

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

Affordable Housing Program grant that was awarded in 2019. This was not a new application. This grant was to cover some of the housing rehabilitation costs from the original RAD conversion of Holton Terrace.

### **18. Capital Fund 5 Year Action Plan: If we have questions on a specific item later in the 5 Year Action Plan, can we submit the questions to HACM?**

**HACM Response:** Yes, if you have any specific questions, please submit them and we will obtain the answer. Also keep in mind that the Capital Fund program is for public housing developments only. If you live in a development owned by an LLC that have been converted via RAD into a PBV development using low income housing tax credits, public housing capital funds cannot be used for those developments. Instead, funds for significant capital needs would come out of the replacement reserves. Replacement reserves are made up of a lump sum at the time of closing with additional reserve deposits on a regular basis to replenish the reserve. Those annual reserve deposits are shown in the annual LLC budgets---such as the one we reviewed at the November 2022 RAB meeting.

### **19. Rent Assistance Inspections: One RAB member stated that she has been in apartments that someone with a voucher has recently rented, and there were issues such that she does not understand how they passed the inspection (dead rodent in unit, small holes, broken window). Please explain how this could happen.**

**HACM Response:** HACM performs a standard inspection using HUD standards. The current standard is "Housing Quality Standards" or HQS. HUD is transitioning public housing authorities(both public housing and voucher programs) to a new standards called Nspire. The inspection must pass before the Housing Authority can enter into a Housing Assistance Payment agreement with the landlord. No subsidy can be paid for a unit that does not pass inspection. Based on the items you mention, the unit should not have passed inspection. However, without knowing how long before you were in the unit that the unit passed inspection, it is difficult to know for sure if this condition existed at the time that the inspection was done (usually before the person moves into the unit) or if it occurred after they moved into the unit. If a participant in the voucher program believes there are deficiencies and the landlord is not repairing items or taking care of them, participants also have the ability to request a complaint inspection from the HACM Rent Assistance department at any time. HACM will send an inspector out to review the property and will send a list of any issues that cause the unit not to pass inspection to the landlord to repair within a certain time.

### **20. Financial Resources: There are some amounts listed in older years for Capital Funds. Are those in danger of not being spent?**

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

**HACM Response:** In most cases, these are items that are already obligated towards capital items but waiting for final expenditures. HACM works closely with HUD to ensure that funds are spent prior to the expenditure deadline (which is typically 5 years) and will request approval from HUD if necessary to shift a specific line item from one year's Capital Fund Budget to a different year if needed.

**21. Admissions and Continued Occupancy Policy, Chapter 3: A RAB member asked if theft victims or other crime victims qualify for VAWA protection or VAWA transfers? Also, does HACM "no trespass" guests of residents that commit crimes in the development?**

**HACM Response:** Unless the crime victim qualifies under VAWA (domestic violence, dating violence, stalking, human trafficking, etc.), they would not be able to request a VAWA transfer. A mere theft victim typically would not qualify. If a resident is not sure if they meet the requirements, they can reach out to the property manager or other HACM staff and, if they believe they are, they can fill out a form to certify their VAWA status. If they believe they are not safe, they can fill out an Emergency Transfer Request form that is another VAWA form (HACM has an Emergency Transfer Policy for VAWA). Residents who are victims of domestic violence also should feel free to contact the Sojourner Family Peace Center hotline.

HACM Public Safety can and does issue no trespass notices to guests that cause problems. However, there may be other situations where we do not have sufficient information to issue a no trespass notice (e.g., lack the name, address, etc. of the person that caused the problem). If there are any questions about a specific situation, please feel free to contact the HACM Interim Chief of Public Safety.

**22. Admissions and Continued Occupancy Policy, Chapter 3: If a resident calls public safety to report a crime in the development, why are they also told to call the police?**

**HACM Response:** Residents or victims should call the police if they believe that there has been a crime, as public safety does not have arrest powers. Additionally, if the police have additional questions (what color clothing is the person wearing; etc.), HACM dispatch is not a witness and we may not have that information. We ask residents to call directly as they are the persons who have the most knowledge.

## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

### **23. Administrative Plan, Chapter 18: Residents wanted clarification on the proposed revision to Chapter 18 (PBVs) on choice mobility option.**

**HACM Response:** The Nan McKay template for the Administrative Plan had additional language that was new this year stating, "Families exercising choice mobility will not be required to vacate their units before a lease has been entered into using their tenant-based voucher. At the time the PHA issues a choice mobility voucher, the PHA will notify the family of their right to remain in their unit if they are unable find a rental unit using the tenant-based voucher. " It is unclear at this time if it was based on new guidance from HUD. However, we have incorporated it into our draft Administrative Plan at this time.

There is an internal question as to whether or not this provision conflicts with the rules over the low income housing tax credit program, which requires leases to be for 6 months or 12 months. Thus, in the case of a resident that found a new unit 2 months after their lease was renewed, would they have the ability to break the lease? There sometimes are inconsistencies between the rules over the voucher/RAD program and that for low income housing tax credits. HACM will follow up with WHEDA, HUD, and our attorneys to ensure that this can meet the HUD requirements and the LIHTC requirements before we put it into practice. HACM will update the RAB when we have better information.

### **24. Administrative Plan, Chapter 18 and elsewhere: Utilities---how and when are they paid?**

**HACM Response:** Sometimes, HACM directly pays utility allowance amounts to WE Energies for housing developments that HACM owns (e.g., RAD developments).

For units in the private market, the utility allowance is typically a reduction in the amount of rent that is owed by the tenant to a landlord. For example, if the total tenant payment (30% of adjusted income) is \$250 and the utility allowance is \$105, the tenant portion of rent is only set at \$145. HACM then pays the difference between that amount and the full rent to the landlord as the Housing Assistance Payment (the subsidy to the landlord).

Utilities are typically paid monthly, unless there has been a hold put on payments for a specific reason.



## RAB Comments on HACM's 2024 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

### **25. Administrative Plan, Chapter 18: If a development converts to RAD, what is the security deposit that is required?**

**HACM Response:** If a development converts to RAD, the security deposit that is required from the tenant is the original security deposit the public housing resident had at the time of the conversion. This amount may have been paid years before when the person moved in, and that that transfers over. The LLC may require a higher security deposit amount. For these original RAD tenants, HACM pays the LLC the difference between that original security deposit amount and the new security deposit requested by an LLC owner.

### **26. Administrative Plan, Chapter 19: How is rent calculated for young persons in the Foster Youth to Independence voucher program (FYI)?**

**HACM Response:** Total Tenant payment is calculated the same way as for others in the voucher program, and is normally set at 30% of adjusted income.

### **27. Administrative Plan, Chapter 19: Can FYI vouchers be used at any Housing Development?**

**HACM Response:** At this time, FYI vouchers are tenant based vouchers. They can be used in HACM developments only for units that are not already subsidized (e.g., a tax credit only unit). They cannot be used for a unit that has a subsidy already (e.g., public housing or project-based voucher). Units cannot receive a double subsidy. The two buildings at Westlawn Gardens with units with a preference for youth aging out of foster care are PBV units, and do not have FYI vouchers attached to them.



**Attachment E:  
C.2.  
HUD-50077-SL  
Certification by  
Local Official**

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

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

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

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

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year 2024 of the Housing Authority of the City of Milwaukee is consistent with the  
*PHA Name*

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


City of Milwaukee  
*Local Jurisdiction Name*

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

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

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

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

Name of Authorized Official: <b>Cavalier Johnson</b>	Title: <b>Mayor</b>
Signature: 	Date: <u>July 6<sup>th</sup>, 2023</u>

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

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

**Attachment F:**  
**C.3.**  
**HUD-50077-ST-HCV-HP**  
**Certifications -**  
**Standard**

**Certifications of Compliance with  
PHA Plan and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

**U.S. Department of Housing and Urban Development**  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations  
including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or **X** Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning **2024**, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;

- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

**Housing Authority of the City of Milwaukee**

**WI002**

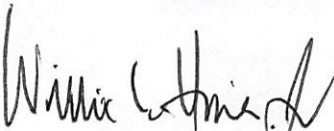
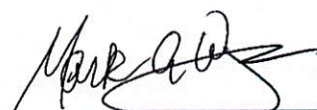
PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year **2024**

5-Year PHA Plan for Fiscal Years 20\_\_ - 20\_\_

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

Name of Executive Director <b>Willie L. Hines, Jr.</b>		Name Board Chairman <b>Mark A. Wagner</b>	
Signature 	Date <b>07/05/2023</b>	Signature 	Date <b>07/03/2023</b>

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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

**Attachment G:  
Challenged  
Elements**



**TAB**

# **Attachment H: Public Notice**

DRAFT



# THE DAILY REPORTER

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

Invoice # 745627688  
 Invoice Date 07/24/2023  
 Customer CITY Of Milwaukee  
 Payment Terms Net 30  
 Due Date 08/23/2023

**BILLING ADDRESS**

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

**ADVERTISER**

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

INVOICE REF	MEDIA	DATE	PO	EDITION	QTY	AD SIZE	
1007119772	The Daily Reporter - Public Notice	07/24/23		Legal - Government	1	Legal - City of Milwaukee	
Thank you for your business! IOID: 2523441 Index: Government Category: Hearings and Minutes Affidavit Reference: PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2024 AN						<b>Subtotal</b>	\$65.18
						<b>Tax</b>	\$0.00
						<b>Credits</b>	\$0.00
						<b>BALANCE DUE</b>	\$65.18

-----  
 REMITTANCE STUB TO BridgeTower Media

<b>Invoice #</b>	745627688 The Daily Reporter - Public Notice	<b>Date</b>	08/23/2023	<b>Customer ID</b>	ID: 26574, CITY Of Milwaukee Housing Authority
<b>Amount Enclosed:</b>					

Acceptable Payment Methods

<p><b>PREFERRED METHOD</b>  <b>To Pay by ACH Transfer:</b>          Bank: Bank of America          Send ACH remittance email to ar@bridgetowermedia.com          Account Number: 237025443017          Routing: 053000196</p>	<p><b>OTHER METHODS</b>  <b>To Pay by Check use the following address:</b>          Please include invoice number on check          BridgeTower OpCo, LLC          P.O Box 745929          Atlanta, GA 30374-5929</p>	<p><b>To Pay by Credit Card:</b>          Use the Click to Pay Online link located on the email you received or Contact Accounts Receivable: 866-802-8214          Please have your Invoice Number and Credit Card Number Ready</p>	<p><b>To Pay by Wire Transfer:</b>          Name: BridgeTower OpCo, LLC          Bank: Bank of America          Swift Code: BOFAUS3N          Bank Address: 100 North Tryon Street          Charlotte, NC 28255          Account Number: 237025443017          Routing: 053000196</p>
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The Daily Reporter  
225 East Michigan Street  
Milwaukee, WI, 53202  
Phone: 4142251801 Fax: 0

# THE DAILY REPORTER

## Affidavit of Publication

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

Re: Legal Notice 2523441, PUBLIC NOTICE OF PUBLIC HEARING FOR  
HACM'S 2024 AN  
State of WI  
County of Milwaukee

### PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2024 ANNUAL PLAN

This 45-day Public Notice is hereby given that the Housing Authority of the City of Milwaukee will hold a public hearing for the 2024 Agency Plan, Admissions and Continued Occupancy Policy (ACOP), Section 8 Administrative Plan, the 5-Year Capital Fund Plan for the period 2024 to 2028, and all associated documents. The purpose of the hearing will be to receive comments as required by the U.S. Department of Housing and Urban Development (HUD)

The Housing Authority of the City of Milwaukee will hold the public hearing on **Wednesday, September 13, 2023 at 1:30pm in City Hall Room 301-A, 200 E. Wells St., Milwaukee WI 53202.**

Interested persons are invited to submit their comments on the Housing Authority's 2024 Agency Plan, Admissions and Continued Occupancy Policy (ACOP), Section 8 Administrative Plan, the 5-Year Capital Fund Plan, and all associated documents via email at [communications@hacm.org](mailto:communications@hacm.org) or via mail to Attention Mr. Willie Hines, Secretary- Executive Director, Housing Authority of the City of Milwaukee, P.O. Box 324, Milwaukee WI 53201. **All written comments must be received by Monday, September 11, 2023.**

A draft of the revised Agency Plan and all other documents will be available for review at [www.hacm.org](http://www.hacm.org) for a 45-day comment period: July 25, 2023 - September 8, 2023.

Please note that upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids. For additional information or assistance contact Marquetta Treadway at 414-286- 5100 (voice) or 414-286-3504 (TDD) or by writing to the ADA Coordinator at HACM, 650 W. Reservoir St., Milwaukee WI 53212.


2523441/7-24

I, Amanda Mahlum, being duly sworn, depose and say: that I am the Authorized Designee of The Daily Reporter, a daily newspaper of general circulation in Milwaukee, County of Milwaukee, State of WI; that a notice, of which the annexed is a printed copy, has been duly and regularly published in the The Daily Reporter once each day for 1 consecutive days; and that the date of the publication were as follows: 07/24/2023.

Publishers fee: \$65.18

By: Amanda Mahlum  
Amanda Mahlum

Sworn to me on this 26<sup>th</sup> day of July  
2023

By: [Signature]  


Russell Klingaman  
Notary Public, State of WI  
No. -  
Qualified in Milwaukee County  
My commission expires on December  
31, 2023

**TAB**

# **Attachment I: Public Hearing**

**Attachment J:  
Summary of  
ACOP & Admin  
Plan changes**

# **SUMMARY OF CHANGES TO THE ADMISSIONS AND CONTINUED OCCUPANCY POLICY AND THE ADMINISTRATIVE PLAN**

## **ADMISSIONS AND CONTINUED OCCUPANCY POLICY (public housing)**

### **Chapter 2, Fair Housing and Equal Opportunity**

1. Page 2-6: Minor changes to the General Housing Discrimination Complaints (page 2-6) to mirror recent HUD guidance.
2. Page 2-7: Added a section on Complaints under the Equal Access Final Rule based on guidance in PIH Notice 2014-20 regarding sexual orientation, gender identity, or marital status.
3. Page 2-8: Added a section on VAWA Complaint Processing based on Notice FHEO 2023-01.

### **Chapter 3, Eligibility**

1. Various pages throughout: Added “human trafficking” as part of the definition regarding the Violence against Women Act per HUD guidance.

### **Chapter 7, Verification**

1. Page 7-2 , 7-9 and 7-11 : removed requirements to witness signature or have it notarized
2. Page 7-6 : Changed the minimum number of paystubs from three to two
3. Page 7-13: Changed the language to state that PHA will not destroy copies of documentation of social security numbers once verified by EIV, per Nan McKay recommendations
4. 7-20: Added a paragraph to emphasize “To ensure consistency in the determination of annual Social Security and SSI income, PHAs are required to use EIV-reported Social Security and SSI benefit amounts unless the tenant disputes the EIV-reported amount (PIH Notice 2018-24)

### **Chapter 8, Leasing and Inspections**

1. Page 8-16: Added missing or inoperable carbon monoxide detectors to the emergency repairs list.

## **Chapter 9, Reexaminations**

1. Page 9-16: While households still must report increases in income, HACM has proposed a change in its policy so that it will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination. Note that change was made in both public housing and the voucher program as there are certain conditions that state that with the EID exception, it must be consistently applied to both programs (See PIH Rental Integrity Summit Frequently Asked Questions)

## **Chapter 12, Transfers**

1. Various pages throughout: Added "human trafficking" as part of the definition regarding the Violence against Women Act per HUD guidance.

## **Chapter 13, Lease Terminations:**

1. Various pages throughout: Added "human trafficking" as part of the definition regarding the Violence against Women Act per HUD guidance.

## **Chapter 14, Grievances**

1. Minor change in reference to VAWA.

## **Chapter 16, Program Administration**

1. Changes to VAWA definitions and addition of human trafficking



## **ADMINISTRATIVE PLAN (vouchers)**

### **Chapter 2, Fair Housing and Equal Opportunity**

1. Page 2-6: Minor changes to the General Housing Discrimination Complaints (page 2-6) to mirror recent HUD guidance.
2. Page 2-7: Added a section on Complaints under the Equal Access Final Rule based on guidance in PIH Notice 2014-20 regarding sexual orientation, gender identity, or marital status.
3. Page 2-8: Added a section on VAWA Complaint Processing based on Notice FHEO 2023-01.

### **Chapter 3, Eligibility**

1. Various pages throughout: Added “human trafficking” as part of the definition regarding the Violence against Women Act per HUD guidance.
2. Page 3-25: Defines “currently engaged” as within the past year.
3. Page 3-26: HUD permits, but does not require, the PHA to deny assistance if the PHA determines that any household member is currently engaged in, or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity. In the past, HACM has conducted this screening for other types of criminal activity. However, in order to streamline procedures and reduce duplication since owners are already responsible for conducting suitability reviews, HACM will no longer conduct additional background screening except for those items that are mandatory under HUD regulations.

Mandatory items include:

- Any member of the household has been evicted from federally assisted housing in the last three years for drug-related criminal activity.
- The PHA determines that any household member is currently engaged in the use of illegal drugs.
- The PHA has reasonable cause to believe that any household member’s current use or pattern of use of illegal drugs, or current abuse or pattern of

abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine in any location, not just federally assisted housing, the family will be denied assistance.
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program

## **Chapter 5, Briefings**

1. Page 5-2: Added a short paragraph regarding briefing notices returned by the post office, allowing HACM to re-send to a forwarding address if available.
2. Page 5-3: Added a sentence that allows HACM to offer other options for video or virtual briefings.
3. Page 5-16: Deleted the following language:

“However, the family must seek approval from the PHA to rent a unit that is one bedroom larger than the family voucher size. If approval is granted, the payment standard for the family voucher size will determine the maximum subsidy. “ This was deleted as it was inconsistent with HUD regulations that allow families to lease an otherwise acceptable unit with more bedrooms than the determined family unit size (24 CFR 982.402 (d) (2)) .

## **Chapter 6, Income**

1. Page 6-52: Changed the policy for decreases in payment standards from implementing at the second reexamination after the change to not reducing it as long as a HAP contract is in effect (e.g., until a family moves or leaves the program).

## **Chapter 7, Verification**

1. Page 7-2 , 7-9 and 7-11- : removed requirements to witness signature or have it notarized
2. Page 7-6 : Changed the minimum number of paystubs from three to two
3. Page 7-14: Changed the language to state that PHA will not destroy copies of documentation of social security numbers once verified by EIV, per Nan McKay recommendations
4. Page 7-22: Added a paragraph to emphasize “To ensure consistency in the determination of annual Social Security and SSI income, PHAs are required to

use EIV-reported Social Security and SSI benefit amounts unless the tenant disputes the EIV-reported amount (PIH Notice 2018-24)

## **Chapter 8 HQS**

1. Page 8-5: Removed some duplicative language regarding extensions to make repairs; additional language that will be kept is on page 8-20.

## **Chapter 9, Leasing**

1. Page 9-11 and 9-12: In addition to the execution of the Request for Tenancy Approval, added references to the lease between the owner and the participant.

## **Chapter 10, Moving**

1. Page 10-13: Some additional language on the decision of an initial PHA to honor late billing by the receiving PHA.
2. Page 10-5: Made the following changes to voucher issuance for a move:

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will issue a new voucher within 15 business days of the PHA's written approval to move. No briefing is required for these families. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration. If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued voucher assistance if the owner agrees and the PHA approves. Otherwise, the family will lose its assistance.

## **Chapter 11, Reexaminations**

1. Page 11-10: Added additional language that HUD's streamlining rule removed the requirement that PHAs had to conduct a reexamination of income whenever a new family member is added, and made it optional. HACM will continue to conduct interim reexaminations when new family members are added.
2. Page 11-13: While households still must report increases in income, HACM has changed its policy so that it will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination. Note that change was made in both public housing and the voucher program as HUD has stated that with the EID exception, it must be consistently applied to both programs (See PIH Rental Integrity Summit Frequently Asked Questions)

## **Chapter 13, Owners**

1. Page 13-8: Added some additional language under conflict of interest to define immediate family members

## **Chapter 15, Special Housing Types**

1. Minor changes with additional detail in the following types: Single-Room Occupancy; Congregate Housing; Shared Housing; Cooperative Housing; and Manufactured Homes.

## **Chapter 16, Program Administration**

1. Page 16-3, Added paragraph to incorporate changes related to PIH Notice 2022-18, related to using administrative fees for strategies and activities to facilitate successful leasing and use of vouchers as an allowable expense.
2. Page 16-7, Added paragraph that states that HUD will allow PHAs to establish a HUD-Veterans Affairs Supportive Housing (HUD-VASH) exception payment standard. PHAs may go up to but no higher than 120 percent of the FMR or SAFMR specifically for VASH families. PHAs who want to establish a VASH exception payment standard over 120 percent must still request a waiver from HUD.
3. Page 16-32 to 16-38: Some additional language to add more detail in the section regarding Owner or Family Debts to the PHA and the ability to enter into a Repayment Agreement.
4. Page 16-45: Added two statements regarding record retention:
  - a. The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].
  - b. The PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].
5. Page 16-53: Changes to VAWA definitions and addition of human trafficking

## **Chapter 17, Project Based Vouchers**

1. Page 17-4 and page 17-16 : Added paragraph on how to treat FUPY/FYI vouchers that are project-based.

2. Page 17-25—Added a sentence that states, The PHA also has the option in certain mixed finance properties to rely on alternative inspections conducted at least triennially.

## **Chapter 18, Project Based Vouchers under the RAD Program**

1. Page 18-38: Inserts an additional lease requirement that says, “ For any family admitted following conversion, the lease must specify what will happen if the family elects to remain in its unit after increasing its income such that it requires zero HAP. Specifically, the lease must make clear how the tenant rent will be calculated, and it must address the transition to a new lease.”
2. Page 18-43: States that if a tenant residing in a converting property has not previously paid a security deposit, the owner may collect a security deposit.
3. Pages 18-47 and 18-48: Adds more detail on Choice mobility option after 12 months for RAD developments, includes requirements to promote it with information during recertification. It also states that families that exercise choice mobility option will not be subjected to re-screening. And that, “Families exercising choice mobility will not be required to vacate their units before a lease has been entered into using their tenant-based voucher. At the time the PHA issues a choice mobility voucher, the PHA will notify the family of their right to remain in their unit if they are unable find a rental unit using the tenant-based voucher.
4. Pages 18-55 and 18-56: Provides additional detail on the steps of how the contract rent is adjusted annually via the operating cost adjustment factor. It also states that, “Properties are eligible to receive prior years’ OCAF adjustments for years in which the OCAF was not taken. The OCAF must be applied retroactively if it was missed. The PHA administering the contract (or the independent entity) must make sure that all OCAFs have been applied correctly since the RAD closing and calculate the current rents accordingly, including making sure that the RAD PBV contract rents do not exceed the PBV program caps.”
5. Page 18-57: Provides a few more details on how utility allowance schedules are originally set and maintained.
6. Page 18-63: For any in-place residents, it adds more details on the phase-in of tenant rent increases, including that if during the phase-in period the tenant’s income drops such that the the TTP is below the phased in rent, the tenant would pay the rent and the phase-in period would end.

## Chapter 19, Special Purpose Vouchers:

1. Pages 19-2 to 19-24: Changes to Family Unification Program vouchers---Not applicable as HACM does not have FUP vouchers.0020
2. Pages 19-25 to 19-42: Changes to the FYI voucher program, including :
  - a. Allowing FYI vouchers to be Project-based under certain circumstances. At this time, HACM is not project-basing any of its FYI vouchers.
  - b. Page 19-32 : FYI voucher holders are allowed one additional 30 day extension beyond those allowed normally for vouchers
  - c. Page 19-34: FYI voucher holders who first leased or lease a unit after December 27, 2020, may be eligible for an extension of assistance up to 24 months beyond the 36-month time limit (for a total of 60 months of assistance). The 24 months extension of the time limit is also available to other categories of exceptions (e.g., parent responsible for the care of a child under the age of 6 or responsible for the care of an incapacitated person.
  - d. More detail on the use of the FSS program by FYI voucher holders
3. Pages 19-43 to 19-56: Changes to the VASH voucher program
  - a. Page 19-48: Allows Exception payment standards up to 120% of FMR or SAFMR
  - b. Page 19-54: More detail on allowing VASH vouchers to be project-based.
  - c. Page 19-55: Detail on how the VASH voucher can be terminated if the participant does not participate in case management without good cause.