

**TAB**

**2023**  
**Agency Plan**  
**HUD-50075-ST**

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

**Applicability.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

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

A.	PHA Information.																										
A.1	<p>PHA Name: <u>Housing Authority of the City of Milwaukee</u>      PHA Code: <u>WI002</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA    <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2023</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>2,445</u>      Number of Housing Choice Vouchers (HCVs) <u>7,531</u>      Total Combined Units/Vouchers <u>9,976</u></p> <p>PHA Plan Submission Type: <input 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 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"> <thead> <tr> <th data-bbox="167 1539 441 1612" rowspan="2">Participating PHAs</th> <th data-bbox="441 1539 573 1612" rowspan="2">PHA Code</th> <th data-bbox="573 1539 872 1612" rowspan="2">Program(s) in the Consortia</th> <th data-bbox="872 1539 1144 1612" rowspan="2">Program(s) not in the Consortia</th> <th colspan="2" data-bbox="1144 1539 1448 1612">No. of Units in Each Program</th> </tr> <tr> <th data-bbox="1144 1612 1289 1675">PH</th> <th data-bbox="1289 1612 1448 1675">HCV</th> </tr> </thead> <tbody> <tr> <td data-bbox="167 1612 441 1711">Lead PHA:</td> <td data-bbox="441 1612 573 1711"></td> <td data-bbox="573 1612 872 1711"></td> <td data-bbox="872 1612 1144 1711"></td> <td data-bbox="1144 1612 1289 1711"></td> <td data-bbox="1289 1612 1448 1711"></td> </tr> <tr> <td data-bbox="167 1711 441 1810"></td> <td data-bbox="441 1711 573 1810"></td> <td data-bbox="573 1711 872 1810"></td> <td data-bbox="872 1711 1144 1810"></td> <td data-bbox="1144 1711 1289 1810"></td> <td data-bbox="1289 1711 1448 1810"></td> </tr> <tr> <td data-bbox="167 1810 441 1890"></td> <td data-bbox="441 1810 573 1890"></td> <td data-bbox="573 1810 872 1890"></td> <td data-bbox="872 1810 1144 1890"></td> <td data-bbox="1144 1810 1289 1890"></td> <td data-bbox="1289 1810 1448 1890"></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>B.</b>	<b>Plan Elements</b>
<b>B.1</b>	<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 type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><b>Statement of Housing Needs and Strategy for Addressing Housing Needs:</b> Waitlist information was updated to July 2022 info.</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection and Admission:</b> Updated for information regarding adoption of the Nan McKay templates for the ACOP and Administrative Plan.</p> <p><b>Financial Resources:</b> This info has been updated based on most current information.</p> <p><b>Homeownership Program:</b> Updated for 2022 outcomes, including ACTS program</p> <p><b>Community Service and Self-Sufficiency Plan:</b> Minor edits to Financial literacy program, Neighborhood Networks, FSS, and Section 3 program.</p> <p><b>Safety and Crime Prevention:</b> Added training plan for VAWA for staff for 2022 or 2023.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
<b>B.2</b>	<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 checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
<b>B.3</b>	<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>B.4</b>	<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>B.5</b>	<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 60.</p>
<b>C.</b>	<p><b>Other Document and/or Certification Requirements.</b></p>
<b>C.1</b>	<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 C</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>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b>   <b>Attachment D</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>
<b>C.3</b>	<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 E &amp; F</b></p>
<b>C.4</b>	<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>
<b>C.5</b>	<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 type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p data-bbox="180 289 617 315">Affirmatively Furthering Fair Housing (AFFH).</p> <p data-bbox="180 340 1437 462">Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <div data-bbox="180 485 1453 934"> <p data-bbox="191 491 438 520"><b>Fair Housing Goal:</b></p> <p data-bbox="191 527 889 556"><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div> <div data-bbox="180 957 1453 1373"> <p data-bbox="191 963 438 993"><b>Fair Housing Goal:</b></p> <p data-bbox="191 999 889 1029"><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div> <div data-bbox="180 1396 1453 1852"> <p data-bbox="191 1402 438 1432"><b>Fair Housing Goal:</b></p> <p data-bbox="191 1438 889 1467"><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div>

## **Attachment**

### **B. Annual Plan Elements**

#### **B.1 Revision of PHA Plan Elements.**

##### **Statement of Housing Needs and Strategy for Addressing Housing Needs:**

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

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

### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

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

If used, identify which development/sub jurisdiction:

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

Characteristics by Bedroom Size (Public Housing Only)

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

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

If yes:

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

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

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

☐ No ☐ Yes (See ACOP)

### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

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

If used, identify which development/sub jurisdiction:

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

Characteristics by Bedroom Size  
(Public Housing Only)

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

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

If yes:

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

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

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

☐ No ☐ Yes (See ACOP)



### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

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

If used, identify which development/subjurisdiction:

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

Characteristics by  
Bedroom Size (Public  
Housing Only)

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

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

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

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

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

### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- ☐ 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	2,244		
Extremely low income <=30% AMI	1,993	88.8%	
Very low income (>30% but <=50% AMI)	205	9.1%	
Low income (>50% but <80% AMI)	33	1.5%	
Families with children	52	2.3%	
Elderly families	276	12.3%	
Families with Disabilities	1310	58.4%	
Race-White	375	16.7%	
Race - Black	1,899	84.6%	
Race—Asian/Other	112	5.0%	
Ethnicity – Hispanic	142	6.3%	

Characteristics by  
Bedroom Size (Public  
Housing Only)

1BR	2,244	100.0%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		

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

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

### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

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

### Housing Needs of Families on the Waiting List

Waiting list type: (select one)

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

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

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



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

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

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

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

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

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

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

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**Financial Resources:**

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

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

## **Grievance Procedures:**

No changes. HACM's Grievance Procedure is provided to assure that any Housing Authority resident has the opportunity for a hearing if that resident disputes within a reasonable time any HACM action or failure to act which involves that resident's lease with the HACM or any HACM regulations which adversely affect that individual resident's rights, duties, welfare, or status. The policy document is available upon request at all administrative offices and housing development locations. The Section 8 Rent Assistance Program gives participant families an opportunity for an informal hearing to consider whether RAP decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations, and RAP policies. The informal hearing is detailed in Section 22 of the Section 8 Administrative Plan.

## **Homeownership Programs:**

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

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

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



**Section 8(y) Homeownership Program:** HACM also administers a Section 8(y) Homeownership Program. The Section 8(y) program assists HACM Housing Choice Voucher program participants in converting their housing voucher towards a mortgage payment instead of a rent payment. Similar eligibility criteria exist, with an additional requirement that participants maintain minimum earned income requirements in order to continue mortgage subsidy. Participants must maintain an earned income level of \$15,000 per year in order to continue receiving mortgage subsidy. Since December 11, 2001, 270 vouchers have been converted from rental to ownership.

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

### **Community Service and Self-Sufficiency Programs:**

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

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

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

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

**Day Care:** HACM has three licensed day care/Head Start providers on-site in our public housing family 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 family public 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. Attached to the Silver Spring Neighborhood Center (SSNC) in Westlawn Gardens, the Browning Elementary School is a Milwaukee Public School (MPS) that serves children in grades K4 through the 5<sup>th</sup> grade.

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

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

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

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

**Healthcare:** HACM currently has two health clinics located in public 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 that are designated for seniors and persons with disabilities. Formerly, it was SET Ministry from 1993 to 2017, then UNISON from 2017-2018, and now Lutheran Social Services of Wisconsin and Upper Michigan (LSS) provides service coordination services. Every year, more than 1,300 residents in Milwaukee's public 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 have been limited during COVID, HACM is planning on developing a calendar of open lab dates and times for late 2022 and 2023 again for these computer labs.

**FSS program:** HACM has a current Public Housing Family Self Sufficiency program (FSS) to serve up to 50 public housing households and a Housing Choice Voucher FSS program to serve up to 100 households. The FSS Case Manager work with these participants to review the program goals and requirements, sign the participation contract, and develop and implement their individualized plan. Increases in earned income that impact rent may result in the

rent increase deposited into an FSS escrow account for the resident. The FSS Case Managers work with any residents who request assistance or are referred by their managers. They will first conduct an individualized assessment to help a resident identify their interests, skills, goals, barriers, and needs. The resident and the Case Manager will then plot out a strategy to help the resident find a job or obtain a better job. The Case Manager will also refer the resident to other services available in the community that are needed to help them with job search, such as G.E.D. preparation courses, driver's education, resume assistance, interview skills, job training, and other skills to help employability.

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

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

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

The three core elements of the Jobs Plus program are:

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

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

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

**Section 3:** In compliance with regulations, HACM makes every effort to hire internally and to require contractors to hire public housing residents and other Section 3 persons to the greatest extent feasible. In addition, HACM ensures that prime contractors awarded Section 3 covered contracts subcontract with Section 3 business entities to the greatest extent feasible. In January 2014, HACM created a Section 3 Coordinator position to assist in ensuring compliance with the Section 3 regulations.

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

HACM helps to link public housing residents and other Section 3 persons with training and employment opportunities whenever possible and does significant outreach to residents to notify them about the availability of such

opportunities, through monthly resident meetings, quarterly resident employment newsletters, and through their case managers. HACM leverages training through community resources, such as the Employ Milwaukee (WIOA training), Wisconsin Regional Training Partnership, Milwaukee Area Technical College, and the Milwaukee Community Service Corps. The training provided by these agencies helps residents compete successfully for employment in the building trades.

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

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

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

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

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

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

WWBIC also offers other programs, such as their personal money management program, Make Your Money Talk, a six-session series covering such topics as creating a personal budget, developing a savings plan, and dealing with past and future credit. Graduates of the program can open an Individual Development Account (IDA), a special savings account where WWBIC will match the participant's savings \$4 for every \$1 saved, with a maximum account level of \$500 in actual participant savings and total with match of \$2000. The IDA's can be used to start a small business, purchase a first home, or further a person's education.

**Lease Addendum:** In HACM's HOPE VI developments (Hillside Terrace, Parklawn, Townhomes at Carver Park, Highland Homes, and Scattered Sites) and at Westlawn Gardens, residents sign a lease addendum that requires them: (1) unless disabled, to have a self-sufficiency plan and work with HACM staff to achieve the goals outlined in the plan; (2) to attend at least 6 of the 12 resident council meetings each year, and (3) cooperate with HACM in assessing and addressing the educational achievements and needs of their children.

To the greatest extent possible and practical, the HACM will provide names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their Community Service obligations (according the QHWRA, a disabled person who is otherwise able to be gainfully employed is not necessarily exempt from the Community Service requirement). HACM will also provide in-house opportunities for volunteer work or self sufficiency programs. HACM will provide the family with exemption verification forms and recording/certification documentation forms and a copy of the policy at initial application and at lease execution. HACM will make the final determination as to whether or not a family member is exempt from the Community Service requirement. Residents may use the grievance procedure if they disagree with the determination.

At lease thirty (30) days prior to annual re-examination and/or lease expiration, HACM will begin reviewing the exempt or non-exempt status and compliance of family members. If a family member is found to be noncompliant, HACM will enter into an agreement with the noncompliant member and the head of household to make up the deficient hours over the next twelve (12) month period. If, at the next annual re-examination, the family member still is not compliant, the lease will not be renewed and the entire family will have to vacate, unless the noncompliant member agrees to move out of the unit. The family may use the grievance procedure to protest the lease termination.

### **Safety and Crime Prevention:**

There are no changes to this section.

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

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

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

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

Public Safety works closely with MPD's vice squad on drug activity at the housing developments. Staff respond to drug complaints from residents and investigate the complaint. If Public Safety staff can substantiate the complaint, they will obtain "intelligence" for MPD so that a search warrant can be obtained. The intelligence gathered by the

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

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

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

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

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

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

**The Violence Against Women Act (VAWA)** requires PHAs to describe any goals, objectives, policies, or programs that enable the PHA to serve the needs of victims of domestic violence, dating violence, sexual assault, or stalking.

The Housing Authority of the City of Milwaukee (HACM) is committed to full compliance with the Violence Against Women Act (VAWA) (1994, 2005 Reauthorization, 2008 Conforming Amendments, and 2013 Reauthorization). It is our objective to work with others to prevent the types of victimization covered by VAWA to the greatest extent possible and to affirmatively further fair housing.

After the 2005 Reauthorization of VAWA, HACM staff and legal counsel consulted with victim advocates in the drafting, revising, and implementation of policy language changes. At that time, HACM worked with advocates from Task Force on Family Violence, American Civil Liberties Union and Legal Action of Wisconsin to incorporate the provisions of VAWA into its Low Rent lease, Admissions and Continued Occupancy Policy (ACOP), Resident Handbook and Section 8 Administrative Plan. The HACM Board of Commissioners adopted the provisions of VAWA at its September 19, 2007 meeting.

HACM has continued to review and update its provisions related to VAWA in both the ACOP and the Section 8 Administrative Plan, based on changes in law and regulations. In 2018, changes were made to adopt an Emergency Transfer Policy” and to make related changes in both ACOP and the Section 8 Administrative Plan.

In addition to the review and amendment of VAWA language in our policies, HACM also recently made modifications to the Notice of Occupancy Rights under VAWA , and will continue to offer the Notice, along with the certification form and the “You Are Not Alone” pamphlet put out by the Milwaukee Commission on Domestic Violence and Sexual Assault or similar information, to all applicants at the time of eligibility and suitability review for housing, to those who are denied assistance, at the time an individual is admitted, and with any notification of eviction or notice of termination of assistance. Additionally, HACM sends a notice regarding VAWA rights to all property owners participating in the Housing Choice Voucher program.

HACM also has a Social Worker and Case Managers on staff and also works with a nonprofit service provider (SET Ministry) in a number of its developments for seniors or persons with disabilities. Each of these individuals offers case management services to those in need, and they occasionally work with victims of domestic violence, dating violence, sexual assault, or stalking. 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. HACM also is a sponsor of the Milwaukee Fatherhood Initiative, which addresses domestic violence in some of its trainings to fathers such as “Nurturing Fathers.”

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 will educate staff 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 will also receive training on how to help victims get connected with services when an actual or threatened domestic abuse incident occurs. In 2017, HACM trained property managers and others managers on updated VAWA forms and policies.

HACM will be providing additional training in late 2022 or 2023 for property management, rent assistance, public safety, and other staff that interact with residents to refresh and update knowledge of VAWA regulations, forms and policies.

### **Pet Policy**

No changes. Residents of public housing developments that are exclusively for the elderly, handicapped, or disabled persons 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 family public housing developments, dogs and cats are permitted only in the single-family scattered site homes. Details of the HACM pet policy are available at all administrative offices and housing development offices.

## **Asset Management**

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

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

## **Substantial Deviation/Significant Amendment**

No Changes.

HACM may amend or modify any policy, rule, regulation, or other aspect of the 5-year and/or Annual Plan.

The Quality Housing and Work Responsibility Act of 1998 does not require an annual update of the 5-Year Plan, but does require that public housing authorities explain any “substantial deviation” from the 5-Year Plans in their Annual Plans. A substantial deviation can include:

- a) A change or changes to the 5-year goals or objectives that are substantial but do not rise to the level of a “significant amendment” (such as the modification or elimination of a specific objective or minor program while retaining the overall strategic goal and accomplishing it through other objectives).
- b) Additions of a Capital Fund project or non-emergency work items that are not included in the current Annual Statement or 5-year Action Plan in an amount less than \$1,000,000;
- c) Or changes in the use of replacement reserve funds under the Capital Fund program in an amount less than \$1,000,000;

As part of the Rental Assistance Demonstration (RAD), the Housing Authority of the City of Milwaukee is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a) The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b) Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c) Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d) Changes to the financing structure for each approved RAD conversion.



A “significant amendment or modification” to its 5-Year plan and/or Annual Plan is a change in policy that significantly and materially alters HACM’s stated mission, goals, objectives and activities as stated in the Plan. If a change is considered a significant amendment or modification to the 5-Year Plan or to the Annual Plan, it must undergo a public process that includes consultation with the Resident Advisory Board; public notice and public comment period; a public hearing, and approval by HACM’s Board of Commissioners; and submission to and approval by HUD.

Significant amendments are defined as including the following:

- a) A change that materially revises the agency’s mission, goals, or objectives;
- b) Material changes to rent or admissions policies or organization of the waiting list;
- c) Additions of a Capital Fund project or non-emergency work items that are not included in the current Annual Statement or 5-year Action Plan in an amount equal to or greater than \$1,000,000, excluding projects arising out of federally-declared major disasters; acts of God beyond the control of the Authority, such as earthquakes, fires, and storm damage; civil unrest; or other unforeseen significant event;
- d) Changes in the use of replacement reserve funds under the Capital Fund program in an amount equal to or greater than \$1,000,000;
- e) Material changes in regard to demolition, disposition, designation, homeownership, capital fund financing, development, mixed financing proposal or conversion activities;
- f) Any other event or activity that the Authority’s Board of Commissioners determines to be a significant amendment to the approved 5-Year Plan or Annual Plan.

## B.2 New Activities

### HOPE VI or Choice Neighborhoods:

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

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

Marquette University was previously awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. College Court (WI002000011) has 251 public housing units that are designated as mixed (designated for seniors and persons with disabilities. Thus, since it is not a family development, College Court is not 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. Either the properties have previously received a HOPE VI grant between 1992 and 2008 and are not eligible for that reason, or are for a senior/disabled population rather than families with children and are not eligible for that reason. 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 family 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:

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

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

### **Mixed Finance Modernization and Development:**

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

Current award statuses include:

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

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

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

## **Demolition and/or Disposition:**

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

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

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

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

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

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

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

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

## **Designated Housing for Elderly and/or Disabled Families:**

In October 2021, HACM was notified by HUD that HACM's Designated Housing Plan for elderly and mixed (elderly and/or disabled) families had expired in June 2021. 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) as well as the highrise in Hillside Terrace sometime in 2022.

## **Conversion of Public Housing to Tenant-Based Assistance:**

No new activities.

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

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

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

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

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

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

AMP	Property	Office Address	Units	Type
WI002000013	ARLINGTON COURT	1633 N. Arlington Pl.	230	PBV
WI002000017	MITCHELL COURT	2600 W. National Ave.	100	PBV
WI002000007	PARKLAWN	4434 W. Marion St.	380	PBV
WI002000062	RIVERVIEW	1300 E. Kane Place	180	PBV
WI002000010	SCATTERED SITES - MILWAUKEE	5003 W. Lisbon Ave.	61	PBV
WI002000061	SCATTERED SITES- SOUTH	5003 W. Lisbon Ave.	64	PBV
WI002000011	COLLEGE COURT	3334 W. Highland Blvd.	251	PBV
WI002000001	HILLSIDE TERRACE	1419 N. 8 <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.

### **Project-Based Vouchers:**

Consistent with HACM's plan to increase affordable housing units, HACM may project-base Housing Choice Vouchers for units owned by the Authority, in joint venture with private developers or solely for other private developers intending to create new affordable housing units. HACM will follow applicable regulations in the issuance of these vouchers.

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

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

### **Units with Approved Vacancies for Modernization:**

In accordance with 24 CFR §990.145(a)(1), HACM received approval from the local HUD office to place units across different elderly/mixed population and family developments into the Undergoing Modernization sub-category. HACM anticipates it will make a similar request in 2023.

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

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

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

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

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

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

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

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

2020

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

2021

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

2022

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

2023

1. Continue predevelopment activities for the Hillside Terrace revitalization

2024

1. Explore financing plan options for Hillside Terrace

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

HACM continues to implement portfolio repositioning through the RAD program.

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

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

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

HACM continues to implement portfolio repositioning through the RAD program:

- Holton Terrace (120 units): All apartments (regular and ADA-accessible) have been completed in early 2021 and majority of the units are leased as of July 2021. Both elevators have been replaced. Community areas are being rehabbed and boiler system will be replaced, and this work should be done by September 2021.

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

## **2022 Progress Report:**

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

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

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

### **Objectives by year:**

#### **2020**

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

#### **2021**

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

#### **2022**

1. Complete CNI/RAD financial closing and start construction of Phase 4A – 79 units (breakout to be determined)
2. Complete CNI/RAD financial closing and start construction of Phase 4C -62 units (breakout to be determined)
3. Complete CNI/RAD financial closing and construct commercial/retail amenities – one project
4. Complete CNI/RAD financial closing and start construction of town-house market rate housing
5. People: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.
6. Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
7. Neighborhood: Continue to implement the Critical Community Improvements activities, including the façade improvement fund, the revolving business loan fund, and the place-making activities.



2023

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

2024

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

**2020 Progress Report:** The Westlawn CNI Transformation Plan continues to be implemented.

- Phase 2B (Westlawn Renaissance III with 94 units total) had the construction completed in late 2019 and was fully leased by August/September 2020.
- Phase 4B (Westlawn Renaissance VI with 138 units total) had a financial closing in April 2020 and construction began during the summer with the first units estimated to be completed by December 2020.
- Phase 3 (Westlawn Renaissance IV with 60 units total, including 30 supportive housing for youth aging out of foster care) is expected to have a financial close in October 2020 with construction to begin in the spring.
- Other redevelopment continues as funding is identified.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return).
- Education: We continue to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Critical Community Improvements continue, including: At least \$225,000 in loans from the Small Business Revolving Loan fund that is administered by WWBIC for businesses expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 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

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

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

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

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

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

- Construction is set to begin in July 2022 and be complete by March 2024.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return) as well as assisting residents that want to work with employment opportunities.
- Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Work to improve the neighborhood development continued as follows:
  - HACM/CNI joined with WWBIC and PNC Bank to launch Black Business Boost, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Since its launch in October 2022, over 600 applications have been received.

- The CNI exterior revitalization grant program awarded a \$50,000 grant to the owners of Silver Spring Mall, located directly across Silver Spring Drive. Combat Corner, which was awarded a \$25,000 grant during the summer, has begun improvements to its facade. Work is moving forward on the Havenwoods Plaza, which was awarded a \$50,000 grant. Additional applications for approximately \$85,000 are under review.
- The CNI loan fund program made several awards to businesses relocating into the CNI neighborhood or expanding in the CNI neighborhood, including:
  - A \$100,000 loan to TMP Aeronautics, a new business that established itself in the CNI neighborhood and that is a supplier to the aerospace industry.
  - A \$250,000 loan to Bert & Tom, LLC to support relocation of a beer distribution business to an empty manufacturing space and plans for a beer garden/tap room with expansion to include a restaurant and commercial kitchen. We are also considering an exterior revitalization grant to support the project.
  - A \$250,000 loan to CRS Enterprises, LLC to purchase one of Milwaukee's oldest African American owned & operated social service organizations to continue those services located in the CNI neighborhood.
- Designs have been completed for the Carmen Playfield renovation, which will include the Tuj Lub courts that are part of the CNI CCI plan. The renovation is schedule to begin in May 2022.
- The Best Babies Zone healthy birth outcomes initiative, facilitated by CNI and funded by a grant from the Greater Milwaukee Foundation, started the year with strategic planning and launched activities with a virtual family self-care event.
- The CNI supported Northwest Fresh Food Access Council continued to meet, strategize and coordinated efforts to increase access to fresh food in the neighborhood. This included coordination to utilize the Browning Elementary greenhouse to grow over 2,000 vegetable seedlings to be transplanted into community gardens this summer by residents and the Teens Grow Greens youth leadership program.
- One of the main goals of the program is coming to fruition as a Sentry Foods grocery store is in the process of locating in the strip mall across the street from Westlawn Gardens, in the spot formerly filled by the Meat Market. This will finally bring a full-service grocery store to the neighborhood.

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

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

2020

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

2021

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

2022

- Reposition AMP WI002000046 Townhomes at Carver Park via RAD Conversion

2023

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

2024

- Develop and implement plan for ultimate disposition of Scattered Sites AMPs above, whether through preservation with project-based vouchers, Homeownership, or disposition in partnership with non-profits:  
AMP WI002000063 Cherry Court Scattered Sites  
AMP WI002000060 Highland Homes Scattered Sites  
AMP WI002000010 Milwaukee Scattered Sites  
AMP WI002000016 North/West Scattered Sites  
AMP WI002000061 Southside Scattered Sites

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

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

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

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

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

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

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

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

2020

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

2021

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

2022

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

2023

- Consider issuing a solicitation for use of excess ACC capacity.
- 2024
- Consider issuing a solicitation for use of excess ACC capacity.

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

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

**2022 Progress Report:** Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

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

### **Objectives by year:**

2020

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

2021

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

2022

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

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

2024 HACM's goal is to maintain utilization at approximately the same number as at the end of 2023.

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

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

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

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

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

- m. A data sharing MOU was established with the Opportunity Milwaukee Mobility team to recruit eligible families for this program and assist in locating a unit. This will help house families more rapidly and increase lease-up.
- n. Implemented a limited homeless preference for the Housing Choice Voucher program.

3. Use of HUD's forecasting tool and HCV dashboard to monitor and report on progress towards goals.

## **2022 Progress Report:**

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

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

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

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

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

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

### Objectives by year:

2020

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

2021

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

2022

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

2023

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

2024

1. Optimize Yardi System's management tool capabilities including launching executive dashboard
2. Deploy capital investments in public housing to improve REAC scores

**2020 Progress Report:** Ongoing. We continue to follow all actions in the corrective action plan with the goal of increasing occupancy of public housing units to 96% and of improving our REAC Physical Inspection scores and are providing quarterly reports on progress to HUD.

We are also continuing to expand upon our use of YARDI's management tools and reports, with a goal to more closely monitor vacant unit turnaround and leasing and status of work orders. This project will continue into 2021.

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

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



**2022 Progress Report:** Ongoing. HACM continues to implement best practices developed in the Recovery Plan with HUD along with performance improvement measures. To date, the occupancy rate has been sustained at 98%. We continue to work to reduce unit turn time under 30 days and address deferred maintenance needs resulting in low REAC scores.

## **2.7 Continue to implement programs for Self Sufficiency.**

### **Objectives by year:**

2020

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

2021

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

2022

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

2023

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

2024

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

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

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

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

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

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

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

### **Objectives by year:**

#### **2020**

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

#### **2021**

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

#### **2022**

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

#### **2023**

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

#### **2024**

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

**2020 Progress Report:** Activities are ongoing.

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

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

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

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

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

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

**2021 Progress Report:** Activities are ongoing.

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

**Tax Credit Management:** In October 2021, HACM/Travaux will take on the management of two additional tax credit properties: Scattered Sites Tax Credit I and Scattered Sites Tax Credit II, each of which is 24 units. HACM will continue to develop and improve management skills to support future property management contracts.

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

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

**2022 Progress Report:**

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

**Tax Credit Management;** Effective 1/1/2022 HACM took back all property management contracts for our affordable portfolio. This includes 120 units at Cherry Court, 80 units at Convent Hill, 114 units at Highland Gardens, 201 units at Lapham Park, 122 units at Townhomes at Carver Park, 24 units at Scattered Site Tax Credit 1, 24 units at Scattered Site Tax Credit 2, 8 units at 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.

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

### Objectives by year:

2020

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

2021

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

2022

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

2023

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

2024

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

**2020 Progress Report:** Ongoing efforts have been made on several activities.

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

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

CNI application for Near West Side: In December 2020 and/or in 2021, HACM intends to apply as applicant or co-applicant for CNI Implementation grant to transform the Near West Side neighborhood, with College Court (WI002000011), other HACM AMPs and/or any other assisted housing developments for families not owned by HACM in the area as target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. College Court (WI002000011) has 251 public housing units that are designated as mixed (designated for seniors and persons with disabilities).

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. College Court (WI002000011) has 251 public housing units that are designated as mixed (designated for seniors and persons with disabilities and Meadow Village has 90 units for families. In April 2021, the City and HACM were informed that the application was not a finalist for CNI funding. HACM may re-apply in 2021 or 2022.

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

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

**2022 Progress Report:**

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

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

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

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

**2.10 Implement Choice Mobility Initiatives.**

**Objectives by year:**

2020

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

2021

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

2022

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

2023

1. Continue to implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program (in partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program).
2. Implement a HUD HCV Mobility Demonstration program if a grant is awarded by HUD. If the grant application was not successful, apply again if funding is available.

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.

**2020 Progress Report:** Ongoing. HACM's Rent Assistance department, working with the Milwaukee County Rent Assistance program and the Metropolitan Milwaukee Fair Housing Council and the national organization MDRC have developed procedures and protocols to use in a demonstration project called Opportunity MKE. This project will work with rent assistance participants to promote and support choice mobility to neighborhoods of opportunity.

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

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

**2021 Progress Report:** Ongoing. HACM's Rent Assistance department, working with the Milwaukee County Rent Assistance program and the Metropolitan Milwaukee Fair Housing Council (MMFHC) and the national organization MDRC have developed procedures and protocols to use in a demonstration project called Opportunity MKE. This project will work with rent assistance participants to promote and support choice mobility to neighborhoods of opportunity.

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

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

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

## 2022 Progress Report:

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

	# Attained	# Needed
# Families enrolled	242	280
From HACM	214	
From Milwaukee County Housing Auth	27	
From Waukesha Housing Auth	1	
# Families in Program Group		200
From HACM	106	
From Milwaukee County Housing Auth	12	
From Waukesha Housing Auth	1	
# Families in Control Group		200
From HACM	108	
From Milwaukee County Housing Auth	15	
From Waukesha Housing Auth	0	

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

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

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

### **Objectives by year:**

2020

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

2021

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

2022

1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. If unsuccessful in 2020, reevaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College Court, other HACM AMPs or any other assisted housing developments in the area as target housing developments.
3. Apply for Housing Trust Fund grants as needed.
4. Review other possible grants to apply for, including supportive service grants.
5. Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

2023

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

2024

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



**2020 Progress Report:** Ongoing.

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

CNI application for Near West Side: In December 2020 and/or in 2021, HACM intends to apply as applicant or co-applicant for CNI Implementation grant to transform the Near West Side neighborhood, with College Court (WI002000011), other HACM AMPs and/or any other assisted housing developments for families not owned by HACM in the area as target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. College Court (WI002000011) has 251 public housing units that are designated as mixed (designated for seniors and persons with disabilities).

**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. College Court (WI002000011) has 251 public housing units that are designated as mixed (designated for seniors and persons with disabilities and Meadow Village has 90 units for families. In April 2021, the City and HACM were informed that the application was not a finalist for CNI funding. HACM may re-apply in 2021 or 2022.

**2022 Progress Report:**

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

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

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

## 2.12 Develop/Implement Comprehensive Housing Plan

### Objectives by year:

2020

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

2021

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

2022

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

2024

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

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

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

**2022 Progress Report:** Ongoing.

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

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

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

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

### Objectives by year:

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

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

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

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

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

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

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

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

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

**Objectives by year:**

2020

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

2021

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

2022

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

2023

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

2024

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

**2020 Progress Report:** Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

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

**2021 Progress Report:** Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 and on eviction moratorium to HACM residents.
- Encouraging proper hand washing and use of sanitizer when hands can't be washed.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Procurement of personal protective equipment (PPE) such as appropriate disinfectant materials, masks, gloves, hand sanitizer, etc.
- Enhanced disinfection of common areas and surfaces for housing developments and offices.
- Prioritizing emergency work orders and pest control during times when access to apartments is limited.
- Distributing and promote information on the COVID-19 vaccine, including locations and times of vaccination sites. Partnered with the City of Milwaukee Health Department and other organizations such as federally qualified health centers and pharmacies to provide transportation to vaccination sites or hold onsite vaccination clinics in housing developments. In senior/disabled 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 senior/disabled buildings, this resulted in vaccination rates ranging from 45% to 80% of residents being fully vaccinated.
- HACM continues during 2022 to promote vaccinations including booster shots, through partner agencies including on-site clinics at developments when possible.
- HACM continues to provide technical assistance to residents to assist in completing Emergency Rent Assistance applications to agencies such as SDC if any resident owes back rent for reasons due to the COVID pandemic

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

See Capital Fund 5-Year Action Plan in EPIC approved by HUD on 11/15/21.

In addition, HACM plans to submit a new 5-year plan for the years 2023 to 2027.

**B.5 Most Recent Fiscal Year Audit**

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

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

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

## **C. Other Documents and/or Certification Requirements.**

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

To be completed after RAB comments and include it as Attachment D.

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

See Attachment E.

### **C.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, Form HUD-50077-ST-HCV-HP & Attachment F, HUD-50077-CR.

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

To be completed after public comment. If there is any material, it will be included as Attachment G.

### **C.5. Troubled PHA.**

HACM is not a troubled PHA.

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

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

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

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

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

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

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

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

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

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

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

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

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

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement should also 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.

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.

# **Attachment C:**

## **C.1. RAB Hearing & Comments**

## RAB Comments on HACM's Annual Agency Plan

**1. Resident Handbook:** Several RAB members stated that they do not have a copy of the current resident handbook for their housing development. In their experience, resident handbooks are only distributed to residents when they move in, if at all. In cases where the buildings have transitioned to RAD, in some cases they believe that the new handbooks have not been distributed. The RAB believes that resident handbooks should be re-distributed to all current residents, and to all new residents when they move in. It was also asked if residents can negotiate the terms (fees and rules) in the handbook.

**HACM Response:** HACM agrees completely with the RAB that all residents should have a copy of the resident handbook in addition to their lease. There is one resident handbook for public housing. In addition, RAD/LIHTC developments each have their own separate handbooks (with similar but not identical contents). While they appear similar, many of the resident handbooks have slight differences due to the fact they were approved at different times and HACM needed to make changes to respond to specific questions from the attorneys or HUD at the time of approval. HACM agrees to work with property management to ensure that appropriate resident handbooks are being distributed to all residents at each housing development.

In addition, HACM is currently in the process of updating the Public Housing lease and Public Housing Resident Handbook as well as the Grievance Procedure. While there is no requirement to negotiate these rules, there are HUD regulations that stipulate that, in public housing, the RAB and public housing residents will be provided with a copy of any changes and will have the opportunity to provide comments and feedback to HACM, and that HACM should consider such comments before finalizing the lease or Resident Handbook. This also applies to the Table of Standard Sales and Service Charges.

**2. Legal Counsel for RAB:** There was a comment that there is a requirement for the RAB to have legal counsel and that the RAB should be provided with its own legal counsel.

**HACM Response:** HACM has reviewed the regulations governing the RAB located in 24 CFR Part 903.13 which read:

“The PHA shall allocate reasonable resources to assure the effective functioning of Resident Advisory Boards. Reasonable resources for the Resident Advisory Boards must provide reasonable means for them to become informed on programs covered by the PHA Plan, to communicate in writing and by telephone with assisted families and hold meetings with those families, and to access information regarding covered programs on the internet, taking into account the size and resources of the PHA.”

## RAB Comments on HACM's Annual Agency Plan

HACM has also reviewed the recent HUD Public Housing Resident Organizing and Participation Toolkit. In Chapter 5 of the Toolkit, under the section on "Housing Authority Support to the RAB, it states the following:

"The housing authority must allow the RAB sufficient time, information and resources to fully carry-out their role, including:

- Sufficient time to review and make recommendations on the Plan.
- Advance notice of meetings (at least 48 hours)
- Adequate information about the housing authority's programs and policies included in the Plan. This may include gathering and compiling data and materials or providing initial recommendations to the RAB.
- Any existing documents that will assist them in making recommendations
- Resources to carry-out their duties, including communicating with other residents and holding meetings with residents. These resources may include:
  - » Meeting space
  - » Printing
  - » Office supplies — such as paper, pens, etc.
  - » Phone
  - » Computer
  - » Internet "

As it is not mentioned in HUD regulations or guidance, HACM does not believe it is a requirement for the RAB to have a separate legal counsel in any HUD regulations or guidance.

While it is not a requirement, we are unsure whether it is allowed and HACM will follow up with HUD to see if it is allowable. The cost of legal counsel might be an allowable cost using resident participation funding. HACM will follow up with HUD.

### **3. Grievance Procedures: RAB members want better notice about the grievance procedures, since many residents are unaware of its existence.**

**HACM Response:** HACM agrees with the RAB that residents need more awareness of how to use the grievance procedure. The HACM Grievance Procedures are currently undergoing a proposed revision and the RAB and public housing residents will receive a copy of the draft Grievance Procedures and will be able to comment on the proposed revisions.

In addition, to better promote awareness, HACM will include a copy of the proposed grievance procedure in the upcoming Public Housing Resident Handbook and will provide copies of the grievance procedures at all developments.

## RAB Comments on HACM's Annual Agency Plan

**4. Section 32 Homeownership: Can a public housing resident in scattered sites request to purchase their existing home?**

**HACM Response:** In HACM's Section 32 program, public housing households or other households that are eligible for public housing have been able to purchase a single-family home that HACM is willing to sell under the program for appraised value. A resident can request to purchase their existing home they are renting, but it is at HACM's discretion as to which public housing properties we are willing to sell as opposed to keeping as a public housing rental property.

**5. Section 8(y) Homeownership: Under the Homeownership section describing the Section 8 y program in the Annual Plan, can the requirements for disabled individuals be also clarified?**

**HACM Response:** The specific guidance will be in the HACM Administrative Plan in Chapter 15. However, HACM will also add additional language to the Annual Plan section on Section 8(y) homeownership describing under what conditions the program is open to both disabled and elderly families and to families that are not disabled and elderly.

**6. VAWA: In addition to training for HACM staff, can the RAB be provided a training session on VAWA and can Sojourner Family Peace Center also participate?**

**HACM Response:** HACM agrees that it would be good to do a training for the RAB on VAWA and HACM's policies over it, and schedule it for some time in the next year. We also agree that Sojourner staff will be would be helpful to have at the training.

**7. LIHTC applications: It was stated that HACM did not meet with residents in a housing development prior to submitting a LIHTC application in late 2021 (the grant had not been awarded to HACM by WHEDA). Can you commit to providing the LIHTC application to the resident organization prior to submittal?**

**HACM Response:** New conversions to RAD have very specific requirements for communications and consultations with residents. This specific LIHTC application was not for a new RAD conversion so did not fall under those rules. While COVID rates at the time (late 2021) did not allow us to have a general meeting with residents, there had been a short meeting between HACM staff person working on the application with the Resident Organization President. In addition, if the grant had been awarded by WHEDA, HACM would have had meetings with residents to discuss the scope and timetable of the project.

HACM agrees that, for any future LIHTC applications, HACM staff will meet with the resident organization to communicate with them prior to application to discuss the application with them. We cannot however commit to providing the actual LIHTC application prior to submittal

## RAB Comments on HACM's Annual Agency Plan

as is electronically submitted, has many attachments, and often is not submitted until right before the due date. Upon request, we can however provide a copy of the LIHTC application, however it often will be after submittal.

As stated earlier, if the grant is awarded, there will be more regular, ongoing meetings with the residents of the impacted development to discuss and update residents' details on scope of work and timeline.

### **8. Repositioning: In the Agency Plan Progress Report Section 2.3, what is repositioning and why is it a goal?**

**HACM Response:** Repositioning involves changing a development's funding source. HACM has repositioned many public housing developments to RAD/LIHTC because HUD's funding for Public Housing has been unstable and has decreased over the years. To address mounting capital needs in aging public housing properties, HUD has created several tools for public housing authorities to use to reposition these developments. These tools include both the Resident Assistance Demonstration (RAD) program as well as the Section 18 Disposition program.

Every property is different and we will continue to look at what possible tool makes sense for the specific housing development. Also, there is a significant requirement for resident input for any repositioning process. As we move forward with any repositioning, we will be holding meeting with the residents of that housing development.

### **9. Performance under RAD: What is the financial performance of properties already under RAD?**

**HACM Response:** The financial impact is different for each property. At the time of the RAD conversions we did over the past 5 years, the funding from public housing was much lower than it is currently so it has been financially beneficial for those properties to convert to RAD.

The challenge for some of the older housing developments (such as highrises and Hillside) that have not converted to RAD yet is that there is a larger amount of capital improvements needed compared with the developments that were converted to RAD first.

## RAB Comments on HACM's Annual Agency Plan

**10. RAD: Has RAD/LIHTC been beneficial to these properties? There were things done with contractors that were not beneficial. Even though the property I live in converted to RAD, there are still outstanding maintenance/capital repairs such as water damage that are needed to be fixed. There are psychiatrists that are telling patients at this time not to move into these buildings as it is detrimental to their health.**

**HACM Response:** Overall, HACM believes that RAD has been beneficial to those properties that converted to RAD and for the overall sustainability of those developments as affordable housing. While some of these properties still have some deferred maintenance needs, we are attempting to deal with those through additional LIHTC funding as well as capital reserves when possible. HACM is currently unaware of any psychiatrists that are telling persons not to move into HACM housing, especially our RAD developments which are often newer and more accessible than our public housing.

**11. Communication regarding RAD: Housing developments that were originally to be converted by now to RAD but have been delayed (such as highrises, etc.) have not received any updated information about their status. There needs to be communication to the residents in those developments about the status of their repositioning and how what the implications are for building maintenance and capital repairs.**

**HACM Response:** We agree that this is a good idea and HACM staff will work to schedule RAD update meetings with residents in these buildings this during the next 6-12 months.

**12. Funding through Resident councils: Besides low-income housing tax credits (LIHTC), couldn't resident organizations that are 501 (c) (3) organizations help HACM to raise funds for capital repairs from wealthy individuals or companies? Also, could the resident organization be the investor itself into the property?**

The biggest source of funding for capital repairs or redevelopment in affordable housing nationwide has been LIHTC, by far. LIHTC has been both effective and efficient because millions of dollars are needed for renovations and this is one of the few sources that provides this type of funding. There are other sources of funding (mortgages, bonding, etc.) which can also be used for revitalization or major capital repairs. Due to the amount of funds needed for much of the work we are discussing when doing major projects, it would be difficult for the amount to be raised through private donations, whether done by a resident organization or by HACM (which is also a 501 (C)(3) organization). However, it may be possible for such funding to assist with more minor projects.

If it makes sense to apply for a grant for funding, we normally evaluate the rules of the grant: what type of organization is eligible; which organization will score best on organization capacity and experience; etc. HACM certainly would evaluate on a case-by-case basis if it makes sense



## RAB Comments on HACM's Annual Agency Plan

to partner on a specific grant with a resident organization or another nonprofit organization for any grant or capital campaign.

As the resident organization, residents have the first right to purchase a property; the challenge would be to raise the amount of money that would be required for purchase.

**13. 501(c)(3) Status for Resident Organizations: Can HACM provide or find another organization to provide technical assistance to resident organizations regarding applying for 501 (c)(3) status?**

**HACM Response:** In the past, HACM was to work with the Nonprofit Center in Milwaukee to provide some training to resident organizations on not only how to apply for 501(c)(3) status, but also how to sustain that status. However, the Nonprofit Center shut down later that year. We will continue to look for additional possible resources or trainings, either in the community or virtually, for interested Resident organizations.

**14. Choice Mobility: We believe not all residents are aware of the choice mobility option in RAD/PBV developments. We want to add a goal to review what materials are used by the voucher program with a goal to improve them or make them more prominent to better promote the choice mobility option.**

**HACM Response:** While we do promote the choice mobility option, if not all residents are aware of it, that is a problem. We agree with the comment and have incorporated an additional goal into the Agency Plan.

**15. Over-income Residents: Can households that are over-income stay in housing?**

**HACM Response:** Over-income is defined differently depending on the program.

In public housing, there is a fairly new requirement that allows housing authorities to terminate households that are over 120% of area median income for two consecutive years, but HUD has not fully implemented it. We are awaiting new guidance from HUD.

In the rent assistance program, the regulations are a bit more complicated. As a family's income increases, the amount of the housing assistance payment decreases. If the amount of housing assistance payment (HAP) provided by the housing authority is reduced to zero, the family's assistance terminates automatically 180 days after the last HAP payment. This applies generally to both housing choice vouchers as well as project-based vouchers.

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**16. HUD regulations on over-income residents: These rules for over-income households do not make sense. Why would you penalize someone for being a higher income? It seems it just forces people to find a lower-paying job or disincentives them from finding a job.**

**HACM Response:** To a certain extent, you are correct. But, whether it makes total sense or not, those are the rules that are established by Congress and HUD and HACM has to follow them.

Per Congress and HUD, if someone is making so much that they do not need the subsidy, the federal government believes they are ready for housing in the private market. For public housing, they set the bar fairly high (120% of AMI). For rent assistance, they give the household a period of 6 months (180 days) to see if they keep up that income. Then, if the household still makes so much there is no longer a rent subsidy, they terminate their voucher.

Again, the theory is that the federal government wants to encourage higher income households to find housing in the private market, and provide opportunities to other low income persons on waiting lists for subsidized housing.

**17. Several RAB members complained about the process for both capital repairs as well as maintenance in units that have been occupied for a number of years. One of the common issues was regarding carpeting in units. RAB members stated that residents that have lived in units for 10 years or longer may have carpeting that is filthy and not clean. Other new residents that may have just moved into a unit have newer carpeting or have had the carpeting removed from the unit. This seems unfair--why can't existing residents be prioritized for these units instead of new residents? In addition, It was also stated that they had read that HUD required carpeting to be replaced every 7 years.**

**HACM Response:** HACM acknowledges that as buildings age, there are repairs that need to be done, either as part of the annual operating budget or via the public housing capital fund for public housing, or for low income housing tax credit/RAD properties, via the operating budget or replacement reserve. This would include replacing carpeting.

The decision to replace is based on individual apartment condition and need, and may be replaced as carpeting or some other flooring surface. Each development creates its operating budget based on the estimated needs of the building, including an estimate of the next calendar year's needs for replacement of carpeting, cabinets, refrigerators, etc. and HACM tries to prioritize the most important repairs.

Due to complaints over the years from residents regarding carpeting in apartments, HACM is currently no longer replacing older carpeting with new carpeting, but rather has changed to a policy of replacing carpeting with different hard surface flooring material.

When people move out of an apartment, HACM often has to do work to get the unit ready for a new tenant, including painting, any repairs needed, etc., and thus, this is a good time to replace flooring. In addition, unless the building receives significant funding such as a tax credit award,

## RAB Comments on HACM's Annual Agency Plan

there is not enough funding to do all apartments at once, so we need to replace them over time.

If there is a resident with a disability that needs carpeting removed as a reasonable accommodation under the Section 504 process for requesting reasonable accommodations, they should submit a reasonable accommodation request and the request will be evaluated by HACM for approval. If this does not fall under a "reasonable accommodation" request, the resident can be submitted as a work order and it will be evaluated.

Under Uniform Physical Condition Standard (UPCS) guidance, carpeting that is damaged or missing, or has holes, rips or tripping hazard should be noted in an inspection, but it may still pass inspection based on the amount of issues with the room's carpeting as a whole unless the inspector notes it as a health and safety hazard.

To the best of our knowledge, HUD does not have a rule in public housing that carpeting must be replaced after seven years. If residents believe there is a regulation or requirement for replacement of carpeting in public housing, or RAD or PBV units, we encourage you to share it with us so we can check with HUD.

**18. Is any Resident Organization or Resident Council in a housing development that is still considered "public housing" as opposed to RAD/PBV entitled to enter into a Memorandum of Understanding with the Housing Authority?**

**HACM Response:** Yes, in public housing developments, 24 CFR Part 964.18 states:

"The HA and resident council shall put in writing in the form of a Memorandum of Understanding the elements of their partnership agreement and it shall be updated at least once every three (3) years."

The Housing Authority understands that it currently lacks these MOUs and needs to develop MOUs with the public housing Resident Organizations/Councils. HACM will work on drafting these MOUs with these public housing resident organizations during the next six months.

**19. Admissions and Continued Occupancy Policy (ACOP), Chapter 4: Can you add more information about devices that can be used to access the housing application website.**

**HACM Response:** Yes, HACM will add more detail on how the housing application website can be accessed, including that the website waitlist.hacm.org can be accessed from computers, tablets, and smartphones. We will also add information on other possible methods of accessing a computer (e.g., any Milwaukee Public Library, or the applicant may work with family or friends that have a computer, tablet or smartphone to assist them in completing the application. Also, we will add language to clarify that reasonable accommodations for those with disabilities are also available for those who need them. This information will be added to Chapter 4.

**20. Admissions and Continued Occupancy Policy (ACOP), Chapter 4: Are there any other changes to the application process, aside from replacing paper applications with online applications?**

**HACM Response:** Yes. In-person informational meeting may still happen, but applicants may instead choose to attend virtual informational meetings via computer or phone.

**21. Admissions and Continued Occupancy Policy (ACOP), Chapter 6: Are HACM's stipends and gift cards used as a stipend included in rent calculations?**

**HACM Response:** No, stipends are excluded as income in doing a rent calculation.

**22. Admissions and Continued Occupancy Policy (ACOP), Chapter 12, Transfers: If a resident in public housing with a 504 Reasonable Accommodation request needs a transfer to a different unit as a reasonable accommodation, will the Housing Authority notify them that they have been approved for a transfer?**

**HACM Response:** Yes, as part of the Section 504 Reasonable Accommodation process, a resident has to be notified of the result of the request, including if the result is a transfer.

In addition, there has been a change in the Administrative Plan that allows a resident with a disability in Public Housing who has requested and been approved for a reasonable accommodation to be placed on project-based wait lists with a preference IF the reasonable accommodation cannot be fulfilled in the public housing program. For example, none of the highrises in public housing have accessible units, but our PBV/RAD program does have accessible units. In that case, HACM would offer the resident available units in the PBV/RAD program that meet their need.

**23. Administrative Plan: Where is the Choice Mobility program detailed in these policies?**

**HACM Response:** For regular Project-based Voucher participants who wish to request a Housing Choice Voucher, the section is in Chapter 17 on pages 17-52 under "Family Right to Move."

For PBV RAD participants who wish to request a Housing Choice Voucher, it is located on in Chapter 18, in the section on "Moves" on pages 18-45 to 18-46.

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**24. Administrative Plan, Shared Housing:** In the previous Administrative Plan, the special housing type “shared housing” was not listed as an allowable form of housing under the Housing Choice Voucher program. RAB members have read about shared housing in national publications and believe it can be helpful given the increased cost of rent and shortage of rental units. The RAB members support expanding allowed special housing types to include shared housing.

**HACM Response:** HACM has agreed to allow “Shared Housing” as a potential option in the Housing Choice Voucher program, if requested by participant and agreed to by the owner. This change was made in Chapter 15 (see pages 15-1 and pages 15-8 to 15-9).

**25. RAB members wanted an update on comments from the general public received last year for the 2022 Agency Plan. Here is the original comments from the general public along with an update on HACM responses.**

**2022 Comment #1--Accessible Housing:** *Two individuals from the Milwaukee nonprofit IndependenceFirst stated that the biggest barrier to relocating individuals out of nursing homes and other facilities was the lack of subsidized accessible housing. The speakers encouraged HACM to use universal design, to ensure that HACM is meeting the minimum number of accessible units in building and renovating, and encouraged HACM to create visitable units as well.*

**2022 HACM Response:** HACM agrees that there is a lack of accessible housing, including subsidized accessible housing, in the country and in the Milwaukee metropolitan area specifically. When much of HACM's housing was built in the 1950s to 1970s, there were no requirements on accessibility. Thus, much of our older housing stock such as our circular highrise towers do create challenges to accomplishing accessibility.

However, as HACM continues to do major renovations to update its aging housing developments or when it does new construction, HACM does ensure that it meets or exceed the current minimum accessibility and visitability requirements required by regulations and guidance.

**HACM 2023 Update:** No changes to our response.

**2022 Comment #2--Suitability:** *An attorney from Legal Action of Wisconsin commented on HACM's suitability guidelines in Section 8.3 of the Admissions and Continued Occupancy Plan (ACOP) for public housing, specifically the guideline that one of the items that HACM considers in reviewing a family's background is their “History of meeting financial obligations, especially rent.”*

*The commenter pointed out that when families have a financial crisis (loss of income, etc.), families often have to make difficult choices about what bills to pay, such as choosing to pay for*

## RAB Comments on HACM's Annual Agency Plan

*food or health costs vs. rent. By disqualifying applicants that have had problems paying rent, HACM is putting up barriers to subsidized housing for low-income persons.*

**2022 HACM Response:** The suitability guidelines that are in Section 8.3 and 8.4 of the ACOP are items included by HUD in its regulations as items that housing authorities should consider. For example, 24 CFR 960.203 (c) (1) of the Code of Federal Regulations states:

*“In selection of families for admission to its public housing program, or to occupy a public housing development or unit, the PHA is responsible for screening family behavior and suitability for tenancy. The PHA may consider all relevant information, which may include, but is not limited to:*

*(1) An applicant's past performance in meeting financial obligations, especially rent;”*

Over the years, HACM has continued to evaluate and revise how HUD's general guidance is implemented by HACM in reviewing applicants for housing suitability. HACM wants to point out that it does not automatically reject every candidate that has any problem in any of the items mentioned under suitability. HACM gives due consideration to the timing, nature and extent of the applicant's or household member's conduct and to other possible mitigating factors, if known or verifiable.

For example, under the category of “meeting financial obligations”, HACM looks at only the most recent history of paying rent when evaluating applicants. In addition, HACM takes into account the circumstances and whether it was caused by issues beyond the control of the applicant, such as loss of employment or other income; if the applicant is paying more than 50% of their income as rent; etc.). Thus, many low-income residents pass the screening and are approved for housing even if they have had past issues in paying rent, depending on their specific circumstances.

**2023 HACM Update:** No change to our response.

**Comment #3--Lease termination requirements:** *The attorney from Legal Action of Wisconsin also mentioned that the requirements in the HACM Administrative Plan for rent assistance in Section 19.2 regarding 60 days' notice for lease termination at the lease anniversary (19.2B and 19.2D) is a barrier to residents in that it could put their subsidized housing at risk outside of that window. She advocated for a shorter notice period.*

*The attorney also pointed out that the requirement in 19.2E states that the family may not end the lease prior to the lease anniversary unless the family and the owner mutually agree to end the lease with cause and RAP approves. By making stating that landlords and tenants must have mutual agreement and with cause gives landlords the upper hand in this and restricts families ability to move. She advocated for a no-fault mutual lease termination.*

**HACM Response:** HACM's Administrative Plan language was originally designed to try to balance the interests of the participant as well as that of the landlord/owner. To put the comments in full

## RAB Comments on HACM's Annual Agency Plan

context, we are providing portions of Sections 19.2 B, D and E below to show the current language of the Admin Plan:

**19.2 B. Proper Notice:** Families are required to give proper written notice of their intent to terminate the lease. In accordance with HUD regulations, no notice requirement may exceed sixty (60) days.

**19.2 D. Moving at Lease Anniversary:** Families may terminate the lease at the lease anniversary date without cause and without the mutual agreement of the owner and RAP approval.

The family is required to give notice to the owner and RAP sixty (60) days prior to the lease anniversary date. The family is required to give RAP a copy of the notice to terminate the lease at the same time as it gives the notice to the landlord. A family's failure to provide a copy of the lease termination notice to RAP will be considered a violation of Family Obligations and may cause the family to be terminated from the program.

A family who gives notice to terminate the lease must mail the notice by certified mail or have the landlord or his agent sign a statement stating the date and time received. The family will be required to provide the certified mail receipt and a copy of the lease termination notice to RAP, or a copy of the lease termination notice and the signed statement stating the date and time the notice was received. If the landlord or his/her agent does not accept the certified mail receipt, the family will be required to provide the receipt and envelope showing that the attempt was made.

**19.2 E. Moving Prior to Lease Anniversary:** During the term of the lease, a family may not end the lease unless it and the owner mutually agree to end the lease with cause and RAP approves. RAP may approve the move only if the family is requesting portability outside of RAP jurisdiction or desires to move to another unit within HACM jurisdiction due to a severe hardship. RAP may require the family to provide third party documentation to verify a severe hardship situation. If the family moves from the unit before the term of the lease ends without the owner's and RAP approval, it will be considered a serious lease violation and will subject the family to termination from the program. Moves without the owner's and RAP approval will have their continued eligibility questioned and have the right to request and attend a Pre-Termination hearing.

During calendar 2022, HACM will review these portions of the Administrative Plan to explore the pros and cons of whether HACM should revise the language to either reduce the notice time period or to allow ending the lease by mutual agreement of the participant and owner, either with or without cause.



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**2023 HACM Update:** For 2023, the Administrative Plan uses a different format, so that language in the plan has changed somewhat. In the new draft Administrative Plan for 2023, the relevant section is Chapter 10, Part I (Moving with Continued Assistance). The language has somewhat changed, although the impact may be similar.

For example, if a family wishes to move, the family needs to terminate the lease with the owner in accordance with the notice provisions in the lease with the owner, as opposed to the 60 days “with cause” previously set forth by HACM (Chapter 10, Part 1).

- “The family has a right to terminate the lease on notice to the owner (for the owner’s breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.354(b)(3)]. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the notice at the same time [24 CFR 982.354(d)(1)].”

However, the 60 days is still listed for voucher issuance. See Chapter 10, Part 1.C:

“For families approved to move to a new unit within the PHA’s jurisdiction, the PHA will issue a new voucher 60 days prior to the lease termination date. 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 will lose its assistance. For families moving into or families approved to move out of the PHA’s jurisdiction under portability, the PHA will follow the policies set forth in Part II of this chapter.”

HACM’s reason for issuing the voucher 60 days prior to lease termination is to allow the family enough time to find a new unit so that they do not have a gap in their housing, if possible.

We do know that this is a concern and we will continue to look at the issue to see whether it makes sense to change this portion of the policy.

***2022 Comment #4--Barriers to Deconcentration: Three speakers including two representatives from the Metropolitan Milwaukee Fair Housing Council (MMFHC) and a participant in the Opportunity MKE housing mobility program (a mother with 4 children) who spoke to several barriers in HACM policy that are barriers to the ability of individuals to move to higher opportunity neighborhoods.***

***Milwaukee has a long history as the most segregated city in America. Milwaukee also has the largest concentration of vouchers in the country in low-income neighborhoods with high populations of minority individuals.***

***High-opportunity generally means neighborhoods with high performing schools, access to employment, low rates of violent crime, and access to other amenities like parks and grocery stores. Research has shown that children from families that move from high poverty to high-***



## RAB Comments on HACM's Annual Agency Plan

*opportunity neighborhoods are 32% more likely to go to college, have significantly higher income, and less likely to be a single parent.*

*MMFHC partners with HACM, Milwaukee County Housing Division, and Waukesha County on a program to improve housing mobility called Opportunity MKE. Unfortunately, as of early September 2021, only three families have successfully made the move to opportunity neighborhoods.*

*Unfortunately, certain HACM policies for rent assistance vouchers create barriers to moves to opportunity neighborhoods as follows:*

- 1. Payment Standard: The payment standard set by HACM is not sufficient for opportunity neighborhoods, which typically have higher rental costs than the overall city metropolitan area. HACM has used the payment standard for rent that HUD sets for the metropolitan area. However, we believe that HACM needs to utilize other tools that HUD allows to allow for increased payment standards for specific neighborhoods (such as exception payment standards based on small area fair market rents by zip code) so that families can find rents that can be subsidized in opportunity neighborhoods.*
- 2. Notice to move: Families must give 60 days to notice to move to their existing landlord. However, this creates an issue as that is insufficient time to locate and move to a new apartment. Although families typically get at least 120 days of search time to find a new apartment, the 60 day notice requirement makes families feel trapped and forces them to make one of four housing decisions if they are unable to find housing by that time: (1) move in with a family or friend at the end of the existing lease; (2) be unsubsidized and pay full rent out of pocket which they cannot afford to do; (3) be forced to sign a renewal with the existing landlord and live in an apartment where they don't want to live; or (4) become homeless. Families should never have to make this choice. They would like more abilities to extend vouchers for a period of time rather than having to sign a new year-long lease.*
- 3. Lack of timely communication from staff of the rent assistance program also is a barrier*

*The participant who spoke is a single African-American mother with 4 children. They currently live in a neighborhood with a high poverty rate and crime rate, where it is unsafe for her and her children to walk in the neighborhood and where there are many shootings and other crime. They would like to move to a neighborhood of opportunity with lower crime and better schools, but feels that some of HACM's policies (as previously stated) are barriers to moving.*

## RAB Comments on HACM's Annual Agency Plan

***All three speakers strongly recommend changes to HACM rent assistance policies that are barriers to housing mobility and that would be a more robust plan to reverse the systems of segregation and hypersegregation in the Milwaukee metropolitan area.***

**2022 HACM Response:** HACM continues to work with MMFHC on the Opportunity MKE program and the rent assistance team meets with MMFHC monthly (it had been every two weeks until recently) to discuss challenges and possible solutions.

The list of actions taken on pages 40-41 of the Agency Plan include a number that will have a positive effect on participants choosing to move to an opportunity neighborhood. These actions include, but are not limited to: (1) additional staffing in rent assistance; (2) follow-up calls to participants that have not yet leased; (3) a data-sharing MOU with MMFHC so they have contact information to assist in recruiting additional families; (4) and the implementation of Small Area Fair Market Rents (SAFMRs) to increase payment standards in selected zip codes determined jointly between MMFHC and HACM. In October 2021, HACM adopted SAFMRs for 5 zip codes in opportunity neighborhoods, as noted on an attachment to this document (zip codes of 53129, 53207, 53213, 53226 and 53228).

Regarding lease-up time, while the standard lease-up time is 120 days, if a participant provides information explaining what difficulties they have had in finding a place to lease, HACM does have the ability to look at the reasons and to approve an extension to the deadline on a case-by-case basis if there is justification and if the person has been actively looking for a place to live.

In addition, HACM will review the issues that were brought up by MMFHC regarding the 60 day notice being insufficient time to give notice and find a new location within opportunity neighborhoods and will develop potential changes in policy if necessary.

**2023 HACM Update:** HACM continues to work on issues that have been identified by MMFHC as barriers, and will look at possible changes where we believe we can incorporate them.

Regarding the 60 day notice, please see our 2023 updated response to the previous comment in this section (see pages 11-13 of this document).

Regarding payment standards, HACM has recently adopted exception payment standards based on the SAFMR for the following 11 additional zip codes at 120% of the SAFMR per the approved expedited waiver expiring 12-31-22: 53002, 53130, 53132, 53154, 53202, 53203, 53211, 53217, 53223, 53224, and 53227. In addition, the 5 zip codes adopted last year have been increased to 120% of FMR: 53129, 53207, 53213, 53226, and 53228.

***2022 Comment #5—Information provided to the RAB: A speaker who was a member of the Resident Advisory Board (RAB) stated that the RAB had never heard about the comments from any of the organizations who spoke today (IndependenceFirst, Legal Action of***

## RAB Comments on HACM's Annual Agency Plan

***Milwaukee, Metropolitan Milwaukee Fair Housing Council) previously, and that they should hear issues prior to the annual plan being approved.***

**2022 HACM Response:** HACM wishes to point out that it did not have any prior knowledge of which organizations, if any, planned to speak at the public hearing on 9/15/2022, and thus could not have informed the RAB of those comments ahead of time.

HACM agrees that it wishes to inform the RAB on many topics that impact HACM and is always willing to bring in guest speakers to inform the RAB members. Based on questions from a RAB member in August regarding Opportunity MKE, HACM had put on the September 2021 RAB agenda a presentation on Opportunity MKE from representatives from the Metropolitan Milwaukee Fair Housing Council. If the RAB desires to invite representatives of other organizations such as IndependenceFirst, Legal Action, or any other partner of the Housing Authority, we will assist in making that happen.

**2023 HACM Update:** No change to our response.

***2022 Comment #6--Reasonable Accommodations: A speaker from the RAB also spoke about the fact that HACM has issues with 504 reasonable accommodation requests and that there are 504 reasonable accommodation requests that have not been resolved for 2-3 years.***

**2022 HACM Response:** Regarding reasonable accommodations, HACM does evaluate reasonable accommodation requests on a case-by-case basis. Assuming there is a relationship documented by a knowledgeable professional between a person's disability and the accommodation requested, we do look to see if the accommodation is reasonable:

1. Would making the accommodation require a fundamental alteration in the nature of our operations?
2. Would it impose an undue financial/administrative burden on the housing development?
3. Are there other alternative reasonable accommodations that could be made instead?

While HACM attempts to resolve reasonable accommodation requests within a reasonable period of time, requests are evaluated on a case-by-case basis and the resolution depends upon the nature of the accommodation requested, and whether there is any undue financial or administrative burden.

Any resident who believes that their accommodation request has taken too long for a resolution should discuss that with their housing manager and/or the Asset Management Supervisor and HACM will check into the issue.

**2023 HACM Response:** No change to our response.

***2022 Comment #7—Moving costs for unresolved emergency inspection issues: In addition, the speaker stated that for individuals with tenant-based rent assistance vouchers, if there***

## RAB Comments on HACM's Annual Agency Plan

***are issues with issues such as mold or other health issues, HACM does not currently pay for the move of the resident and that this needs to be provided.***

**2022 HACM Response:** The PHA must inspect the unit leased to a family prior to the initial term of the lease, at least biennially during assisted occupancy, and at other times as needed, to determine if the unit meets the HQS. (See [§ 982.305\(b\)\(2\)](#) concerning timing of initial inspection by the PHA.) Thus, the unit must pass inspection when the lease starts. In scheduling inspections, the PHA also must consider complaints and any other information brought to the attention of the PHA.

If a participant family or government official reports a condition that is life-threatening (*i.e.*, the PHA would require the owner to make the repair within no more than 24 hours in accordance with [§ 982.404\(a\)\(3\)](#)), then the PHA must inspect the housing unit within 24 hours of when the PHA received the notification.

If the reported condition is not life-threatening (*i.e.*, the PHA would require the owner to make the repair within no more than 30 calendar days in accordance with [§ 982.404\(a\)\(3\)](#)), then the PHA must inspect the unit within 15 days of when the PHA received the notification.

HUD regulations do not require PHAs to provide moving costs to families in the situation described. However, HACM agrees that these costs can be a barrier to families in similar situations and will try to identify other potential partner organizations or possible funding besides for such costs. If we do, we will communicate it to our staff and residents. Based on this comment that had also been previously made by the RAB, we have added a statement to this effect into the 2022 Agency plan under Goal 2.11 "Apply for various Development and Supportive Services grants whenever /wherever they are available."

**2023 HACM Update:** No change to our response.

## RAB Comments on the Public Housing Dwelling Lease, Resident Handbook and Grievance Procedures

### RAB COMMENTS ON THE PUBLIC HOUSING DWELLING LEASE

**1. Language of the Lease:** HACM was encouraged to simplify the language in both the lease and the handbook, considering that the primary audience for these documents is residents, not lawyers. It was felt the lease especially was written in too legal a language. RAB members also mentioned that there are specialists that can help to make documents easier for residents with cognitive issues to understand. One specific place that was mentioned as difficult to understand is in the area of rent payment methods and rent due dates.

**HACM Response:** While this lease is very similar to most standard landlord/tenant leases in the State of Wisconsin, HACM will collaborate with the City Attorney's Office to see where or if simplifications can be made on these legal documents to enhance reading comprehension.

**2. What does the lease mean in Section 1B "The term shall be one year and shall renew automatically for another year, unless terminated as provided by this lease"?**

**HACM Response:** In the private market, a landlord can decide not to renew a lease. This provision is required under public housing and it means that HACM cannot just decline to renew the lease unless HACM goes through termination process as described by the lease. Residents do sign a renewed lease during the recertification process, however recertification meetings to sign the lease do not always happen right at the time of lease renewal.

**3. Are all residents limited to the rent payment methods mentioned here?**

**HACM Response:** No, only public housing residents are subject to this specific lease language, including the rent payment methods listed here. RAD/PBV developments may have different methods of paying rent.

**4. Why are there additional fees for air conditioning, refrigerators and freezers?**

**HACM Response:** In public housing, some developments have utilities included (for example, many of the senior/disabled highrises and Hillside Terrace development) and others may receive a utility allowance to pay estimated utility costs. These additional fees are excess utility fees to cover the extra utility costs resulting from the resident using a major additional appliance in developments where the housing authority pays the utility expenses.

**5. What is the \$10 nonrefundable pet fee is for?**

**HACM Response:** For family public housing developments (general occupancy developments), only residents in single-family Scattered Site Public Housing are allowed to have pets. Thus,

## RAB Comments on the Public Housing Dwelling Lease, Resident Handbook and Grievance Procedures

this fee only applies to those residents. This fee is intended to cover the reasonable operating costs to the project relating to the presence of pets. Reasonable operating costs to the project relating to the presence of pets include, but are not limited to:

- Landscaping costs
- Pest control costs
- Insurance costs
- Clean-up costs

**6. Unauthorized Dogs:** Several RAB members mentioned that there is a problem with how many residents in family developments have dogs, including pitbulls and rottweilers which are not allowed by the City. They know that some residents are provided dogs as assistance animals, but do not know who is allowed to have a dog and who is not. Can the resident leaders be provided a list of those residents that are approved for assistance animals? RAB members also recommended a letter be sent to residents reminding them of the policies over pets/animals.

**HACM Response:** Having an unauthorized pet is a lease violation that could lead to eviction if the owner doesn't remove the pet. However, HACM also has to be careful with the confidential and sensitive information such as a list of names of residents who have requested and been approved for a reasonable accommodation for a disability.

HACM encourages residents to report addresses to the management office who they believe have a dog and HACM will review to see if there is an unauthorized animal in the unit. For resident safety, it is best to let HACM deal with the issue rather than trying to confront the other resident directly. We will look into the legal possibility of sharing addresses of those units approved for animals with resident leadership.

HACM agrees with the RAB that a separate mailing to all residents regarding rules over pets/animals is a good idea and will work to coordinate such a mailing.

**7. Where in the lease does it describe the consequences for criminal and drug activity?**

**HACM Response:** In Section 5 (Q) of the lease, it states that residents shall not engage in drug-related or violent criminal activity, among other activities. The consequences for such activity is lease termination. Residents with any knowledge of drug houses and/or criminal activity should report it to both Public Safety and the police's non-emergency number.

## RAB Comments on the Public Housing Dwelling Lease, Resident Handbook and Grievance Procedures

### RAB COMMENTS ON THE PUBLIC HOUSING RESIDENT HANDBOOK

**1. Will the Public Housing Resident Handbook be available in every management office in public housing?**

**HACM Response:** Yes. Once a final version is approved, it will be printed and bound and available for distribution at developments.

**2. Will any other resident comments sent to HACM during the public comment period be shared with the RAB?**

**HACM Response:** Yes, HACM will share any comments received prior to the next RAB meeting at that meeting and will share any additional comments in the future.

**3. Will the bedbug flyer previously developed be passed out independently of the resident handbook?**

**HACM Response:** Yes, it is an independent document.

**4. What happens when HACM does not make repairs in a timely manner? For some work orders, it has taken months for the work orders to be addressed. Also, HACM does not always provide residents with copies of work orders that they submit, so residents are unable to prove when work orders are requested.**

**HACM Response:** HACM's maintenance department responds to work orders using a priority classification system. Emergency work orders are the highest priority and should be resolved or addressed within 24 hours or less per HUD guidelines. Lower priority items may take longer to address. HACM's maintenance staff have been short-staffed, but HACM is attempting to get caught up on the backlog of regular work orders.

HACM's Property management will check into the issue regarding developments not providing the resident a copy of a work order to document it. We agree that the resident can request documentation of the work order request. Of course, some work orders, especially in family developments, are taken over the telephone. In those cases, if requested, a copy can be left with the resident once someone comes out to inspect the issue.

**5. Can HACM look at the carpet section in the "Self-Help" section of the Handbook. RAB members are still concerned about worn, old and/or filthy carpeting in units. Another resident had a concern about cracked flooring (tiles). Additionally, can a section on Hoarding be included in the self-help section?**



## RAB Comments on the Public Housing Dwelling Lease, Resident Handbook and Grievance Procedures

**HACM Response:** HACM understands the members' concern about carpeting that was mentioned during the Agency Plan and Capital funds discussions. HACM is attempting to replace carpeting with other types of flooring as units are vacated. HACM will review these sections of the Handbook and will also include a section on hoarding in the Self-Care section of the Handbook.

### **6. Are residents who are licensed to conceal carry a gun do so within HACM buildings?**

**HACM Response:** HACM's Board approved a policy years ago when the laws changed over concealed carry in Wisconsin. Residents may have a gun in their unit, but the gun must be concealed and carried directly into and out of the building – nobody may linger in common areas with a gun. We will provide a copy of that policy to the RAB and will consider whether any language should be added to the Handbook.

### **7. RAB members want clarification on how smoking is prohibited in the housing developments and in apartments.**

**HACM Response:** In addition to this rule appearing in the handbook, it also appears in the smoke-free lease addendum signed by the resident. If HACM finds evidence of in-unit smoking (tobacco, marijuana, or anything else), it could lead to eviction. It can be difficult to know if a unit smells of smoke because someone has smoked inside, or because a person who smoked outdoors has clothes that smell of smoke and thus bring that smell indoors on their clothing. However, we do follow up on complaints and if we find evidence of smoking, we follow the Smoke Free Policy regarding lease violations.

### **8. There were questions about carbon monoxide detectors (why are there none at Parklawn) and about smoke detectors (why do some chirp when they are supposedly hard-wired?).**

**HACM Response:** Parklawn has radiant heat and does not have a boiler in the unit. Since there are no natural gas devices, carbon monoxide detectors are not needed at Parklawn.

Regarding smoke detectors, most are wired, with a battery backup for when the electricity goes out. The device chirps when the backup battery dies, and a resident should submit a work order to replace the backup battery.

### **9. For the pet deposit on the Table of Standard Sales and Service Charges, RAB members suggested that HACM consider charging seniors and persons with disabilities in "general occupancy" developments a deposit of only \$50, and others in "general occupancy" developments \$100. In that way, seniors and those with disabilities will be treated similar to seniors/disabled individuals in the public housing highrises and will benefit from the lower costs.**



## RAB Comments on the Public Housing Dwelling Lease, Resident Handbook and Grievance Procedures

**HACM Response:** HACM will review and consider if it is practical to implement this change in the policy. It would only really impact the single-family scattered sites. If we believe it can be implemented legally and easily, we will make the change in our final draft.

**10. Additionally, the Handbook should be clarified in several areas to clearly state that only single-family scattered sites may have dogs/cats as pets. There should also be greater clarification about what kinds/numbers of pets allowed under the pet policy, such as fish and birds, as well as which types of pets trigger the \$10 non-refundable fee.**

**HACM Response:** HACM will review and consider such changes to the final version of the policy to clarify these items.

**11. Some RAB members had a concern about rent late fees for persons that are on a fixed income. While social security and SSI amounts are deposited typically by the federal government on the 3<sup>rd</sup> of the month, HACM only gives residents until the 5<sup>th</sup> of the month to pay their rent. This can create difficulty in turning around that payment so quickly through the mail/etc. and it was wondered if HACM could extend the due date.**

**HACM Response:** It is very common for most tenant/landlord leases that rent is paid on by the 5<sup>th</sup> day of the month or a resident will be charged a late fee. We will continue that provision of the lease. Typically, as long as the payment is mailed and postmarked by the 5<sup>th</sup> of the month, it is not considered late. However, one suggestion for residents in this situation is to set up an ACH transfer with their bank to automatically withdraw rent on an appropriate day (such as the 4<sup>th</sup> or 5<sup>th</sup> of the month). Thus, it would happen automatically after the deposit date. Additionally, in the future, HACM intends to add a payment system to accept and scan checks in our public housing developments; this technology is already used in our PBV/RAD developments and will be expanded to public housing within the next year.

**12. Does HACM allow advance rent payments? Some managers have discouraged or prohibited this; others have done this without any problems.**

**HACM Response:** HACM believes that paying rent in advance is allowable. However, we will double check with Wisconsin landlord-tenant law to ensure compliance with any applicable laws. Once we determine that, HACM will ensure that all staff are knowledgeable about our policies and procedures regarding advance rent payments.

**13. Can veteran services be added to the list of Important Telephone Numbers/Resources?**

**HACM Response:** Yes, HACM will include it in the final draft.

**14. Can the RAB have a copy of the revised draft of the Handbook?**

## RAB Comments on the Public Housing Dwelling Lease, Resident Handbook and Grievance Procedures

**HACM Response:** HACM will provide it to the RAB prior to the October Board meeting.

### **RAB COMMENTS ON THE RESIDENT GRIEVANCE PROCEDURE**

There were no comments on the Grievance Procedure.

DRAFT

## RAB Comments on the 5-Year Capital Fund Action Plan 2023 to 2027

### 1. What do blank cells in the 5-Year Capital Plan mean?

**HACM Response:** A blank cell indicates that no investment is planned for that development during that year.

### 2. Which repairs are eligible for Capital Funds?

**HACM Response:** Minor repairs or routine maintenance (such as a leaky toilet) are usually covered by public housing operating funds, while larger repairs (such as elevator repairs/replacements and window replacements) are able to be paid out of public housing capital funds. Also, if a unit is radically deteriorated, replacement items that might individually be considered routine maintenance could be collectively considered eligible for capital funds as deferred maintenance.

### 3. Are 504 Reasonable Accommodation requests eligible for Capital Funds? How much money is HACM currently spending on 504 Accommodations? Are unit transfers always required for 504 Accommodations?

**HACM Response:** Yes, there is a line item for Reasonable Accommodations in the 5-Year Capital Fund Action Plan . A total of \$100,000 has been included for the 5-Year Action Plan for 2023 to 2027 for 504 Accommodations in all Public Housing developments.

As a comparison, if one were to look at the last Capital Fund Action Plan for 2017 to 2022 approved by HUD on 11/15/2021 , the last plan had a budget line item of \$10,000 for Year 5 (just for 2022) for the cost of work items related to accommodations. Thus, the new capital fund action plan would represent an increase in budget for those items.

Additionally, some 504 requests involve unit transfers and/or assistance animals or other types of requests which do not involve capital funds. Unit transfers are not always required for 504 reasonable accommodation requests. Rather, each situation depends on how much work would be needed for required updates, and some developments are more accessible or more easily modified than others. Thus, each request is unique and reviewed on a case-by-case basis.

### 4. What is line item 0500 “Soft cost-Training (Management Improvement (1408)-Staff Training)”?

**HACM Response:** Staff training could include many topics, but this focuses on using the housing management software (Yardi). The specific description is “Training for PHA Personnel Operations and Procedures including, rent collection, resident selection and eviction. Improvement to the PHA, management, financial, accounting control.”

## RAB Comments on the 5-Year Capital Fund Action Plan 2023 to 2027

**5. How are the repairs identified in the 5-Year Capital Fund Action Plan prioritized since more repairs are needed than can be funded?**

**HACM Response:** Items identified in REAC inspections (done on behalf of HUD) are prioritized. Any comments or suggestions from housing managers and housing management; Central Maintenance; Travaux; the RAB; public housing residents; and the public are also considered.

**6. As was mentioned during the Annual Agency Plan discussion, carpets in public housing, specifically Scattered Sites, need to be replaced, similar to those in Project-based housing.**

**HACM Response:** Given the significant backlog of deferred maintenance, HACM has had to prioritize certain items that impact the general structures or are required by REAC inspections, due to the limited amount of funding received from HUD.

However, there are also work items in this budget for some Scattered Sites developments in some years that describe other items of deferred maintenance on an as-needed basis upon unit turnover, such as “kitchen/bathroom sink and counter replacement, toilet replacement (low flow toilets), flooring, caulking, appliance replacement, tub replacement.” While not specific to carpeting, this could include it on a limited, but as-needed basis.

We do appreciate this comment and all others on the specifics of this Action Plan. Once we have received all comments, including comments from residents of public housing during the public comment period, we will review the budget to determine if we can make any changes to this action plan.

**7. Are the fences (item 0414) identified in the Parklawn Capital funds planned for Parklawn for the daycare and playground?**

**HACM Response:** Yes, they are.

**8. Is any work planned for repairing Parklawn’s ramps?**

**HACM Response:** Yes, see item 0427, about concrete walkway repairs.

## RAB Comments on the 5-Year Capital Fund Action Plan 2023 to 2027

### **9. Why does the same type of work appear repeatedly, but with different costs?**

**HACM Response:** The same type of work may be needed at several developments over several different years, and thus it is listed separately each time. For example, roof repair at Parklawn will cost more than roof repair at Arlington, and it might happen in different or multiple years.

### **10. Hillside units do not have air conditioning, why does item 0490 mention replacing the AC?**

**HACM Response:** We believe that this item refers to air conditioning in community areas, such as in the highrise. We will review this with staff to determine.

### **11. Can the sewer/plumbing replacement line work (item 0458) happen sooner, ideally next year? This is a major concern and high priority for Parklawn residents.**

**HACM Response:** HACM understands the importance of this item for Parklawn residents. We will review this comment with staff to determine if there is any possibility to move the sewer/plumbing replacement line work currently scheduled to 2026 to an earlier year.

### **12. HACM should build into the capital fund action plan more weatherization projects. At Riverview, the TV and Exercise area has a 10-degree difference from the rest of the building. Can we upgrade the windows there? Also, please inspect all units to ensure that the heaters function.**

**HACM Response:** HACM does annual inspections of units. In addition, if any resident has an issue with the heat or temperature in their apartments, they should contact their management office for a work order and maintenance will check on it. Additionally, HACM will request an inspector from Travaux evaluate the TV and Exercise area for insulation improvements at Riverview. Riverview's roof is scheduled to be replaced in 2023 (item 0471), and tuckpointing done in 2025 (item 0473), which may also help insulate the building to an extent.

### **13. Do developments that aren't public housing have an equivalent of the 5-Year Capital Plan?**

**HACM Response:** Yes, Tax credit/RAD properties have 20-year replacement reserve schedules, which are developed by the LLC and approved by investors, HUD, WHEDA, and HACM at the time that the development converts to RAD. The plans take into consideration the estimated useful life of building components. For example, Cherry Court may have a larger replacement reserve than Holton Terrace because of the age of the most recent renovations and extent of

## RAB Comments on the 5-Year Capital Fund Action Plan 2023 to 2027

capital work that is needed. The replacement reserve plan schedules reflect the estimated needs of each building.

**14. Do 20-year replacement reserve schedules limit the opportunity of residents to comment on needed repairs?**

**HACM Response:** No, residents are always encouraged to report needed repairs to housing managers.

**15. How much rent money is allocated to maintenance?**

**HACM Response:** There is no way to specify rental income vs. other types of operating income such as operating subsidy from HUD that is used for a specific expense line item.

In the public housing program, the 2022 public housing budget approved by the Board of Commissioners shows total operating income of \$17,762,639. This includes \$8,523,851 of total rental income. The total amount of maintenance expenses for public housing developments in this budget is \$6,154,625.

**16. When will HACM submit this document?**

**HACM Response:** A public hearing will occur at the September 15, 2022 HACM Board of Commissioners meeting at 1:30 PM at City Hall and comments will be accepted there. HACM will also accept written comments by mail or email.

The Board of Commissioners will vote on this 5-Year Capital Fund Action Plan for 2023 to 2027 and a number of other documents (Annual Agency Plan, ACOP, Administrative Plan, Public housing Lease, Public Housing Resident Handbook, Resident Grievance Procedures) at their October meeting on October 12, 2022.

**Attachment D:**  
**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 **2023** of the **Housing Authority of the City of Milwaukee** is consistent with the  
*PHA Name*

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

**City of Milwaukee**

*Local Jurisdiction Name*

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

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

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

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

Name of Authorized Official:

**Cavalier Johnson**

Title:

**Mayor**

Signature: 

Date: **July 14th, 2022**

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 E:**

**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 **2023**, 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 **2023**

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

**Willie L. Hines, Jr.**

Name Board Chairman

**Mark A. Wagner**

Signature

*Willie L. Hines, Jr.*

Date **7/29/22**

Signature

*Mark A. Wagner* **7/25/22**

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 F:**  
**C.3.**  
**HUD-50077-CR**  
**Civil Rts**  
**Certification**

# Civil Rights Certification (Qualified PHAs)

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

## Civil Rights Certification

### Annual Certification and Board Resolution

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 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 fiscal year beginning **2023** in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

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. 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.

### Housing Authority of the City of Milwaukee

WI002

PHA Name

PHA Number/HA Code

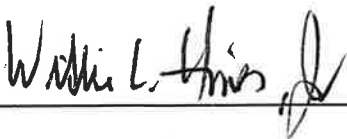
I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director:

Name of Board Chairperson:

**Mark A. Wagner**

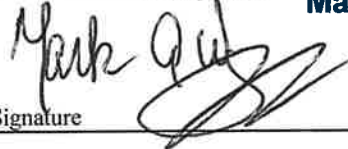
Signature



Date

7/20/2022

Signature



Date

7/12/22

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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.

# **Attachment G: Challenged Elements**

# **Attachment H: Public Notice**



## INVOICE

## Daily Reporter Publishing Company

a division of BridgeTower Media  
 PO Box 745929  
 Atlanta, GA 30374-5929  
 1 (612) 333-4244

City of Milwaukee Housing Authority  
 Accounts Payable  
 PO Box 324  
 Milwaukee, WI 53201-0324

Account #
10075556
Invoice Date
7/28/2022
Invoice #
745489494
Order #
12141450
Terms
NET 30
PO/Case #
Salesrep

Days/Inserts	Description	Size/Qty	Unit Price	Amount
1	<b>PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2023 ANNUAL PLAN</b> This 45-day Public Notice is hereby given that the Housing Authority of the City of Milwaukee will hold a public hearing for the 2023 Agency Plan, Admissions and Continued Occupancy Policy (ACOP) <b>Daily Reporter (WI)</b> <b>Government / Hearings and Minutes</b> 07/29/2022 -Base Charge -Affidavit	1 col x 6.55in 278 wrd / 59 ln		78.59 1.00
<b>TOTAL DUE</b>				<b>79.59</b>

## Acceptable Payment Methods:

## To Pay by Check:

BridgeTower OpCo, LLC  
 PO Box 745929  
 Atlanta, GA 30374-5929

## To Pay by ACH:

Bank: Bank of America  
 Contact Linda Burnette  
 Account Number: 237025443017  
 Routing Number: 053000196

## To Pay by Credit Card:

Contact Accounts Receivable:  
 866-802-8214  
 Please have your Invoice Number  
 and Credit Card Number Ready



# PROOF OF PUBLICATION

STATE OF WISCONSIN }  
MILWAUKEE COUNTY } S.S.

Joe Yovino, being the first duly sworn on oath, says that he or she is the Associate Publisher/Editor of THE DAILY REPORTER, which is a public newspaper of general circulation, printed and published daily in the English language in the City of Milwaukee, in said county, and fully complying with the laws of Wisconsin, relating to the publication of legal notices; that the notice of which the printed one attached is a true copy, which was clipped from the said newspaper, was inserted and published in said newspaper on

Jul. 29, 2022

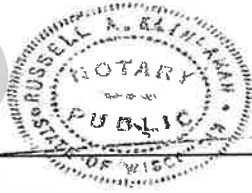
*Joe Yovino*

Joe Yovino, Associate Publisher/Editor

Sworn to me this 29th day of July 2022

*Russell A. Klingaman*

Russell A. Klingaman  
Notary Public, Milwaukee County, Wisconsin  
My Commission Is Permanent



## PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2023 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 2023 Agency Plan, Admissions and Continued Occupancy Policy (ACOP), Section 8 Administrative Plan, Public Housing Resident Lease, Public Housing Resident Handbook, and the 5-Year Capital Fund Plan for the period 2023 to 2027 for the purpose of receiving comments as required by the U.S. Department of Housing and Urban Development.

The Housing Authority of the City of Milwaukee will hold the public hearing on **Thursday, September 15, 2022 at 1:30pm in City Hall Room 301-B, 200 E. Wells St., Milwaukee WI 53202.**

Interested persons are invited to submit their comments on the Housing Authority's 2023 Agency Plan, Admissions and Continued Occupancy Policy (ACOP), Section 8 Administrative Plan, Public Housing Resident Lease, Public Housing Resident Handbook, and the 5-Year Capital Fund Plan via email at [communications@hacm.org](mailto:communications@hacm.org) or via mail to Attention Mr. Willie Hines, Secretary-Executive Director, Housing Authority of the City of Milwaukee, P.O. Box 324, Milwaukee WI 53201. **All written comments must be received by Monday, September 12, 2022.**

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 29, 2022 - September 12, 2022.

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 Patricia Schmidtke at [414-286-5100](tel:414-286-5100) (voice) or [414-286-3504](tel:414-286-3504) (TDD) or by writing to the ADA Coordinator at HACM, 650 W. Reservoir St., Milwaukee WI 53212.

12141450/7-29

# PROOF OF PUBLICATION

# PUBLIC NOTICE

## Daily Reporter Page 23 - July 29th, 2022

FRIDAY, JULY 29, 2022

THE DAILY REPORTER

WNAJLP | PAGE 23

N. 9th Street, Milwaukee, Wisconsin, Room 207.

DATE SIGNED: July 22, 2022

Electronically signed by

Robert B. Rondini

Deputy Register in Probate

Matthew M. Farnholz

SBN: 1065765

Cramer, Muthauf & Hammes, LLP

P.O. Box 558

Waukesha, WI 53187

262-542-4278

12141786/7-29/8-5-12

### Notice to Creditors

(Informal Administration)

Case No. 2022PR001208

STATE OF WISCONSIN, CIRCUIT

COURT, MILWAUKEE COUNTY

IN THE MATTER OF THE ESTATE

OF KATHRYN A. VERDEYEN,

Deceased.

PLEASE TAKE NOTICE:

1. An application for informal administration was filed.

2. The decedent, with date of birth August 6, 1934 and date of death January 29, 2022, was domiciled in Milwaukee County, State of Wisconsin, with a mailing address of 10200 West Bluemound Road, Apt. 630, Wauwatosa, Wisconsin 53226.

3. All interested persons waived notice.

4. The deadline for filing a claim against the decedent's estate is October 29, 2022.

5. A claim may be filed at the Milwaukee County Courthouse, 901 North 9th Street, Milwaukee, Wisconsin, from 207.

DATE SIGNED: July 26, 2022

Electronically signed by

Robert B. Rondini

Deputy Register in Probate

Elizabeth B. Taylor - Walden,

Natzke & Kuhary, S.C.

SBN: 1026964

707 West Moreland Boulevard,

Suite 9

Waukesha, Wisconsin 53188

(262) 547-5517

12141853/7-29/8-5-12

## Hearings

### PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2023 ANNUAL PLAN

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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 Patricia Schmidt-Knecht 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.

12141450/7-29

## Official Publication

### NOTICE

PURSUANT TO SECTION 200-26.5 OF THE MILWAUKEE CODE OF ORDINANCES AN APPLICATION FOR A PERMIT TO RAZE 1431 E North Ave WAS RECEIVED ON 07/18/2022 BY THE CITY OF MILWAUKEE DEPARTMENT OF NEIGHBORHOOD SERVICES.

12140685/7-29

### NOTICE

PURSUANT TO SECTION 200-26.5 OF THE MILWAUKEE CODE OF ORDINANCES AN APPLICATION FOR A PERMIT TO RAZE 2215 N Cambridge Ave WAS RECEIVED ON 07/18/2022 BY THE CITY OF MILWAUKEE DEPARTMENT OF NEIGHBORHOOD SERVICES.

12140686/7-29

### NOTICE

PURSUANT TO SECTION 200-26.5 OF THE MILWAUKEE CODE OF ORDINANCES AN APPLICATION FOR A PERMIT TO RAZE 9857 W Menomonee Park Ct WAS RECEIVED ON 07/13/2022 BY THE CITY OF MILWAUKEE DEPARTMENT OF NEIGHBORHOOD SERVICES.

12140684/7-29

### City of Milwaukee

#### Official Notice

Published by Authority of the Common Council of the City of Milwaukee  
Office of the City Clerk  
07/29/2022

I, James R. Owczarski, City Clerk of the City of Milwaukee, certify that pursuant to Section 4-06-3 of the Milwaukee City Charter, notice is given of the passage of the following ordinances by the Common Council of the City of Milwaukee on 07/12/2022, with the approval of Mayor Cavalier Johnson. The full text of each of the ordinances listed below can be obtained at the Office of the City Clerk, Room 205, City Hall, 200 E. Wells Street, Milwaukee, Wisconsin, 53202.

212005 A substitute ordinance relating to the change in zoning from Industrial Heavy, IH, to Industrial Commercial, IC, to allow for a wider mix of industrial and commercial uses on the property located at 913 West Bruce Street, on the southwest corner of West Bruce Street and South 9th Street, in the 12th Aldermanic District.

220066 A substitute ordinance relating to the change in zoning from Industrial Light, IL2, to Two-Family Residential, RT4, to reflect the existing residential use of the site located at 2013 South Allis Street, on the west side of South Allis Street, south of East Stewart Street, in the 14th Aldermanic District.

220067 A substitute ordinance relating to the change in zoning from Industrial Mixed, IM, to Down-Town-Mixed Activity, C9G, for the property located at 640 East Summerfest Place, on the north side of East Summerfest Place, west of North Harbor Drive, in the 4th Aldermanic District.

220243 An ordinance relating to the naming of West McAuley Place, in the 4th Aldermanic District.

220292 A substitute ordinance relating to parking controls.

220293 A substitute ordinance relating to traffic controls.

220323 A substitute ordinance to further amend the 2022 rates of pay of officers and positions in the City Service.

220350 An ordinance relating to the role of the department of emergency communications.

12140233/7-29

### No. C-17

#### File Number 220303

#### OFFICIAL NOTICE

Published by Authority of the Common Council of the City of Milwaukee Office of the City Clerk

Substitute resolution approving levying of assessments and construction of assessable public improvement projects at various locations and appropriating funds for

these purposes with the City cost of these projects approved by this resolution is estimated to be \$62,465 for a total estimated cost of \$146,100. Whereas, The Common Council of the City of Milwaukee adopted preliminary resolutions, determining it necessary and in the public interest to construct and levy special assessments for the following improvements:

#### 1st Aldermanic District

N. 33rd St. - W. Villard Ave. to W. Custer Ave. (ST211220141) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,575; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$12,500. This project is anticipated to be completed during the 2022 construction season.

N. 38th St. - W. Custer Ave. to W. Sheridan Ave. (ST211220145) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,390; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 40th St. - N. Hopkins St. to W. Villard Ave. (ST211220140) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$1,505; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 48th St. - W. Lusher Ave. to W. Fairmount Ave. (ST211220163) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$3,710; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$11,710. This project is anticipated to be completed during the 2022 construction season.

N. 50th St. - W. Lusher Ave. to W. Fairmount Ave. (ST211220143) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$3,325; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$12,400. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220162) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,330; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 98th St. (ST211220151) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$1,500; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,500. This project is anticipated to be completed during the 2022 construction season.

#### 7th Aldermanic District

N. 29th St. - W. Concordia Ave. to W. Townsend St. (ST211220154) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,745; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 49th St. - W. Hope Ave. to W. Marion St. (ST211220146) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,400; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 49th St. - W. Hope Ave. to W. Marion St. (ST211220153) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$1,490; Nonassessable Reconstruction Paving Fund -- \$1,505). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 56th St. - W. Parkway Dr. to W. Hampton Ave. (ST211220150) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$5,045; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$16,200. This project is anticipated to be completed during the 2022 construction season.

#### 10th Aldermanic District

N. 53rd St. - W. Clarke St. to W. Clarke St. (ST211220195) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,165; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,300. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

N. 58th St. - W. Clark St. to W. Clark St. (ST211220169) install traffic calming speed hump(s). (Assessable Reconstruction Paving Fund - \$2,430; Nonassessable Reconstruction Paving Fund -- \$1,500). The total estimated cost for this project including the requested amount is \$7,100. This project is anticipated to be completed during the 2022 construction season.

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the speed hump projects will be utilizing ARPA (American Rescue Plan Act) funds: The project/grant number is RG1515236103; and, be it Further Resolved, That the Department of Public Works is authorized to use the funding as specified in the above description of work; and, be it

Further Resolved, That projects N. 33rd St. (ST211220141), N. 38th St. (ST211220145), N. 40th St. (ST211220140), N. 48th St. (ST211220163), N. 50th St. (ST211220143), W. Carmen Ave. (ST211220162), N. Darian St. (ST211220142), W. Lancaster Ave. (ST211220123), N. 61st St. (ST211220167), W. Stark St. (ST211220176), W. Thurston Ave. (ST211220151), N. 29th St. (ST211220154), N. 49th St. (ST211220146), N. 49th St. (ST211220153), N. 56th St. (ST211220150), N. 53rd St. (ST211220195), N. 58th St. (ST211220169), will be billed after January 1, 2024, but not before 12 months after the project contract has been completed.

Passed: July 22, 2022  
James Owczarski, City Clerk  
Approved: July 21, 2022  
Cavell Johnson, Mayor

12140227/7-29

### NOTICE TO CITY OF WEST ALLIS ELECTIONS

#### PUBLIC TEST OF ELECTRONIC VOTING EQUIPMENT

Notice is hereby given that the Public Test of the optical scan tabulating equipment for the City of West Allis, Milwaukee County, to be held at the August 9, 2022 Fall Partisan Primary Election will be conducted on Thursday, August 4, 2022 at 9AM in the Art Gallery, 7525 W. Greentree Ave.

Rebecca Grill  
City Administrator/Clerk

12140215/7-29

## Subsequent Publications

### Civil Suits

#### PUBLICATION SUMMONS

Case No. 22CV002569

Our File #W070429

STATE OF WISCONSIN CIRCUIT COURT, MILWAUKEE COUNTY

AMERICAN FINANCIAL, LLC DBA

CNAC Plaintiff, vs. DONTIL C

SERCY Defendant.

THE STATE OF WISCONSIN

TO: DONTIL C SERCY

4569 S WHITALL AVE APT 307

SAINT FRANCIS WI 53235

You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is also served on you, states the nature and basis of the legal action.

Within Forty (40) days after July 15, 2022, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the court, whose address is: CLERK OF CIRCUIT COURT, MILWAUKEE COUNTY, 901 N 9TH ST, MILWAUKEE WI 53233 and the Kohn Law Firm, Plaintiff's attorneys, whose address is 735 N. Water St., Suite 1300, Milwaukee, WI 53202. You may have an attorney help or represent you.

If no Complaint accompanies this Summons you must respond within the said 40 day period with a written demand for a copy of the Complaint by mailing or delivering said written demand to the court and to the Plaintiff's attorneys at their respective addresses listed above.

If you do not provide a proper answer to the Complaint or provide a written demand for said complaint within the 40 day period, the court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien

# **Attachment I: Public Hearing**