

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #1: In discussing homeownership, one Resident Advisory Board (RAB) member asked about participant qualifications for the Section 8(y) homeownership program.

HACM Response: Basic qualifications for the program were discussed after the question, such as a minimum of \$15,000 per year in earned income. In addition, HACM will review its marketing of the program to our participants in the voucher program to ensure that all potentially eligible participants are aware of it.

RAB Comment #2: During the review of the policy on Significant Amendments and Substantial Deviations, one RAB member stated that he believed the significant amendment thresholds listed in the policy were too high, such as the addition of a capital fund project not included in the current annual statement or 5 year action plan that was more than \$1,000,000.

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

HACM's capital funding can range from \$6,000,000 to over \$8,000,000 annually. A significant amendment is a change in policy that significantly and materially alters HACM's stated mission, goals, objectives and activities as stated in the Plan. Significant amendments require public hearings and public notice.

The determination from HACM management at the time was that it should not be triggered by minor changes in a capital budget or in minor wording changes, but should be reserved for items such as major changes or additions to a capital item, material changes to rent policies, admissions policies, etc., or major changes on demolition, disposition or conversion activities.

The determination at the time regarding capital items included a threshold of over \$1,000,000, as we did not believe a change of \$100,000 or even \$500,000 in the capital budget appeared significant enough compared to the annual or 5 year capital plan to require a public hearing before the Board of Commissioners.

RAB Comment #3: One RAB member felt that the RAB should be involved in any HACM meetings held that involved senior HACM staff discussing budgets and policies. They also should be involved in all meetings regarding design and floorplans for renovations and new construction. The member also was dismayed to learn about the proposed construction next to Convent Hill (currently called, "Convent Hill South" or "The Caroline") from the newspaper rather than from HACM representatives.

HACM Response: After the meeting, HACM representatives to the RAB shared again the federal regulations regarding the Resident Advisory Board as well as other HUD guidance with all RAB members, including contact information for local HUD office representatives. See the bottom of this response for more detail on that guidance.

Specifically, the role of the Resident Advisory Board is to assist and make recommendations regarding the development of the PHA Annual or 5 Year Plan, and any significant amendment or modification to the PHA plan.

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HACM does not believe the purpose of the Resident Advisory Board is to become involved in the day-to-day operations of the Housing Authority. We have also had discussions with HUD representatives who affirmed that this understanding was correct. We have provided contact information to the local HUD representatives to all RAB members in case they wanted to follow up with them on this topic.

When HACM is proposing specific changes to a housing development, HACM does have meetings with residents of the impacted housing to discuss issues such as the proposed scope of work for the renovation or new construction, the relocation plan (if necessary), and how any such work would impact residents.

Regarding “Convent Hill South”, it is only a proposed development at this point and will not be constructed for a couple years as design, budget and financing needs to be worked out. During the early stages, there were concept meetings with the design team and residents of Convent Hill. In addition, it is mentioned in the Five Year Annual Plan and is in the current Annual Plan.

Summary of HUD regulations and guidance regarding the RAB:

The purpose of the RAB is described in the Code of Federal Regulations (24 CFR Part 903.13). Specifically, the role of the Resident Advisory Board is to assist and make recommendations regarding the development of the PHA Annual or 5 Year Plan, and any significant amendment or modification to the PHA plan. HUD’s website also states the following:

What are the PHAs Responsibilities? PHAs have the responsibility to ensure that the RAB can adequately serve its function including

- PHAs must give the RABs sufficient time to review and make recommendations on the Plan. RABs will be able to contribute best if they are provided with adequate information regarding the PHA’s programs and the policies included in the Five-Year and Annual PHA Plan.
- The PHAs should give RABs advance notice of meetings scheduled to discuss areas of the Plan (generally, at least 48 hours, or more depending on the meeting agenda).
- RABs should also be provided with any existing documents that would assist them to make productive recommendations during the working meetings.
- PHAs should provide the RABs with reasonable means to carry out their functions such as making available a meeting place for discussing programs with the residents. RABs should also have access to any other communication tools such as a telephone, writing material, or computers that may facilitate their contacts with other resident households or to obtain further information on the programs.

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At what stage in the planning process must PHAs involve the RABs?

The role of the RABs is to assist and make recommendations regarding the development of the PHA Plan and any significant amendments or modifications to it. RABs should be involved in the planning process as soon as it is feasible and must be given sufficient time to fully participate in the process so that they can carry out their proper role and provide representation that is meaningful and relevant to the development of the Plan.

The PHA and the RAB should develop a reasonable timetable to promote participation, including adequate notice of meetings. To facilitate productive meetings, PHAs may do preliminary work prior to involving the RABs, such as gathering and compiling data and materials to help residents participate in the process, including some initial recommendations. A PHA must consider the recommendations of the RABs and make revisions to drafts or to the Plan which it deems appropriate.

Incorporating RAB Comments into Plan: PHAs are required to consider the RAB's recommendations to the Plan but are not required to agree with them. The recommendations received must be submitted by the PHAs as a required attachment to the Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. It is prudent for PHAs to acknowledge those recommendations that conform to the programs and the mission of the PHA. If the RABs do not provide recommendations to the Plan, the PHA must document that in the attached narrative.

RAB Comment #4: RAB members asked what will happen to goals that HACM has not completed on time.

HACM Response: Typically, goals in the 5 Year Agency Plan are not reset for the first couple years as some may be accomplished in Year 2 rather than Year 1. However, by Year 3, HACM may reevaluate goals to determine if they are still relevant and worthwhile or if they have or should be changed. If so, HACM will propose revisions to the goals.

RAB Comment #5: One RAB member had never heard of the Housing Trust Fund (a potential source of funding for HACM) and wanted an explanation.

HACM Response: HACM provided information on the Housing Trust Fund so that the RAB was familiar with it. The Milwaukee Housing Trust Fund is a City of Milwaukee fund that provides grants and loans for the construction, rehabilitation and accessibility modification of affordable housing for low- to moderate-income households. Since 2007, the Housing Trust Fund has provided \$3 million in grants and loans, leveraging more than \$62 million in additional funding sources and generating 421 housing units.