

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Wi002

Applicability. 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 of 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, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 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: Housing Authority of the City of Milwaukee _____ PHA Code: WI002</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): 01/2021</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 2392 Number of Housing Choice Vouchers (HCVs) 6947 (with RAD) Total Combined Units/Vouchers 9339</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Housing Authority of the City of Milwaukee has posted a copy of its 2020 to 2024 5-Year Agency Plan, and the 2020 and 2021 Annual PHA Plan on its website, http://www.hacm.org/ for public review. In addition, a copy is located at HACM's main office at 809 N. Broadway, 3rd Floor, Milwaukee, WI 53202</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p>																								
	<table border="1"> <thead> <tr> <th data-bbox="167 1585 443 1661">Participating PHAs</th> <th data-bbox="443 1585 573 1661">PHA Code</th> <th data-bbox="573 1585 873 1661">Program(s) in the Consortia</th> <th data-bbox="873 1585 1146 1661">Program(s) not in the Consortia</th> <th colspan="2" data-bbox="1146 1585 1448 1633">No. of Units in Each Program</th> </tr> <tr> <th data-bbox="167 1633 443 1661"></th> <th data-bbox="443 1633 573 1661"></th> <th data-bbox="573 1633 873 1661"></th> <th data-bbox="873 1633 1146 1661"></th> <th data-bbox="1146 1633 1289 1661">PH</th> <th data-bbox="1289 1633 1448 1661">HCV</th> </tr> </thead> <tbody> <tr> <td data-bbox="167 1661 443 1759">Lead PHA:</td> <td data-bbox="443 1661 573 1759"></td> <td data-bbox="573 1661 873 1759"></td> <td data-bbox="873 1661 1146 1759"></td> <td data-bbox="1146 1661 1289 1759"></td> <td data-bbox="1289 1661 1448 1759"></td> </tr> <tr> <td data-bbox="167 1759 443 1856"></td> <td data-bbox="443 1759 573 1856"></td> <td data-bbox="573 1759 873 1856"></td> <td data-bbox="873 1759 1146 1856"></td> <td data-bbox="1146 1759 1289 1856"></td> <td data-bbox="1289 1759 1448 1856"></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.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" 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> <ul style="list-style-type: none"> • Statement of Housing Needs and Strategy for Addressing Housing Needs: Updated the wait list information to 9/2020 data. • Deconcentration and other Policies that Govern Eligibility, Selection and Admissions: See this section for a summary of any changes to the Admissions and Continued Occupancy Policy (ACOP) or the Administrative Plan. • Financial Resources: Updated the financial sources and uses information • Homeownership Programs: Updated the detail on homeownership programs, including number of participants assisted <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input 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 type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Language Access Plan</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>Description of new activities planned for 2021 begins on page 19.</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. Attachment A</p>

B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(c) 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.7	<p>Certification by State or Local Officials.</p> <p><u>Form HUD 50077-SL</u>, <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> <p>Attachment</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>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.</p> <p>See HUD Form-50075.2 approved by HUD on 4/29/2020. 333</p>

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 September 2020:

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing (Family)			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	5,197		200-300
Extremely low income <=30% AMI	4,082	78.5%	
Very low income (>30% but <=50% AMI)	935	18.0%	
Low income (>50% but <80% AMI)	180	3.5%	
Families with children	1735	33.4%	
Elderly families (62+)	16	0.3%	
Families with Disabilities	1,147	22.1%	
Race - White	421	8.1%	
Race - Black	4,748	91.4%	
Race - Asian/Other	99	1.9%	
Ethnicity - Hispanic	272	5.2%	

Housing Needs of Families on the Waiting List			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	3,940	75.8%	
2 BR	664	12.8%	
3 BR	252	4.8%	
4 BR	265	5.1%	
5 BR	70	1.4%	
5+ BR	6	0.1%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)? 34			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed?			
<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (See ACOP)			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing (Elderly/Disabled)			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	1746		200-300
Extremely low income <=30% AMI	1,615	92.5%	
Very low income (>30% but <=50% AMI)	111	6.4%	
Low income (>50% but <80% AMI)	20	1.1%	
Families with children	0	0.0%	
Elderly families (62+)	176	10.1%	
Families with Disabilities	1,396	80.0%	
Race – White	465	26.6%	
Race – Black	1,260	72.2%	
Race – Asian/Other	21	1.2%	
Ethnicity – Hispanic	173	9.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	1,746	100.0%	
2 BR	N/A	No longer available	
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		

Housing Needs of Families on the Waiting List

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

If yes:

HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)?

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

☐ 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	3,000		600
Extremely low income <=30% AMI	2,265	75.55%	
Very low income (>30% but <=50% AMI)	635	21.16%	
Low income (>50% but <80% AMI)	80	2.66%	
Families with children	1,536	51.2%	
Elderly families	85	2.8%	
Families with Disabilities	486	16.2%	
Race-White	379	12.6%	
Race-Black	2,685	89.5%	
Race-Asian/Other	185	6.2%	
Ethnicity – Hispanic	244	8.1%	

Characteristics by
Bedroom Size (Public
Housing Only)

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

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

If yes: How long has it been closed (# of months)? 3 months

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	9		
Extremely low income <=30% AMI	Not available		
Very low income >30% but <=50% AMI)	Not Available		
Low income >50% but <80% AMI)	Not available		
Families with children	0	0.0%	
Elderly families	0	0.0%	
Families with Disabilities	6	66.7%	
Race-White	0	0.0%	
Race - Black	9	100.0%	
Race—Asian/Other	0	0.0%	
Ethnicity – Hispanic	0	0.0%	

Characteristics by
Bedroom Size (Public
Housing Only)

1BR	9	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"/> Project-Based Section 8 Site-Based (Highland Gardens) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	10		
Extremely low income <=30% AMI	Not available		
Very low income >30% but <=50% AMI	Not available		
Low income >50% but <80% AMI	Not available		
Families with children	0	0.0%	
Elderly families	0	0.0%	
Families with Disabilities	6	60.0%	
Race -White	0	0.0%	
Race -Black	10	100.0%	
Race -Asian/Other	0	0.0%	
Ethnicity – Hispanic	0	0.0%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	10	100%	
2 BR	0	0.0%	
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 checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" 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	8		
Extremely low income <=30% AMI	Not available		
Very low income >30% but <=50% AMI	Not available		
Low income >50% but <80% AMI	Not available		
Families with children	0	0.0%	
Elderly families	0	0.0%	
Families with Disabilities	3	37.5%	
Race -White	0	0.0%	
Race--Black	8	100.0%	
Race -Asian/Other	0	0.0%	
Ethnicity- Hispanic	0	0.0%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	8	100%	
2 BR	0	0.0%	
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 checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input checked="" type="checkbox"/> Project-Based Section 8 Site-Based (Convent Hill) <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	7		
Extremely low income <=30% AMI	Not available		
Very low income (>30% but <=50% AMI)	Not available		
Low income (>50% but <80% AMI)	Not available		
Families with children	0	0.0%	
Elderly families	0	0.0%	
Families with Disabilities	2	28.6%	
Race -White	0	0.0%	
Race - Black	7	100.0%	
Race -Asian/Other	0	0.0%	
Ethnicity- Hispanic	0	0.0%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	7	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 checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" 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) 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.

HACM has not made any changes to its Admissions and Continued Occupancy Policy (ACOP) and Section 8 Administrative Plan as a result of regulatory changes for this year.

Financial Resources:

Financial Resources: Planned Sources and Uses		
Sources	Planned Amount	Planned Uses (for Non-Federal funds)
1. Federal Grants		
a. Public Housing Operating Subsidy (estimated)	\$6,079,350	
b. Public Housing Capital Fund (estimated)	\$7,800,000	
c. HOPE VI Revitalization		
d. HOPE VI Demolition		
e. Annual Contributions for Section 8 Tenant-Based Assistance (estimated)	\$35,151,910	
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):		
2014 Replacement Housing Fund (RHF)	0	
2015 Replacement Housing Fund (RHF)	0	
2016 Replacement Housing Fund (RHF)	0	
2015 Choice Neighborhood Implementation	\$4,751,751	
2. Prior Year Federal Grants (unobligated funds only –list below)		
Capital Fund Program (CFP) 2016	Fully obligated	
Capital Fund Program (CFP) 2017	Fully obligated	
Capital Fund Program (CFP) 2018	\$202,346	
Capital Fund Program (CFP) 2019	\$118,333	
Capital Fund Program (CFP) 2020	\$129,385	
3. Public Housing Dwelling Rental Income	\$9,836,066	
4. Other Income (list below):		
Section 32 Sales	-0-	Homeownership
Investment income	\$3,300	Operations
Miscellaneous income	\$768,851	Operations
5. Non-Federal Sources (list below)		
HACM-owned Housing	\$7,858,908	3333333333Operations
Investment income	\$132,000	Operations
Miscellaneous	\$1,550,400	Operations
Total Resources	\$74,382,600	

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:

No changes.

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

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 9/16/2020, 16 scattered sites units have been sold.

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, 263 vouchers have been converted from rental to ownership.

Community Service and Self-Sufficiency Programs:

There are no changes to this section.

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 8th grade and is located at the Parklawn development. For the 2019-20 school year, the Cyberschool is also starting a high school program in Parklawn. Attached to the Silver Spring Neighborhood Center (SSNC) in Westlawn Gardens, the Browning Elementary School is a Milwaukee Public School (MPS) that serves children in grades K4 through the 5th grade.

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

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

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 2nd floor of the Hillside Family Resource Center, the Westside Healthcare Association's Hillside clinic is a federally qualified health center that provides a variety of 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. Services at both clinics are available to residents 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 th Street
Highland Gardens	1818 W. Juneau Ave.
Cherry Court	1525 N. 24 th Street
Convent Hill	455 E. Ogden Ave.
Westlawn Gardens (in Silver Spring Neighborhood Center)	5460 N. 64 th Street

Each Neighborhood Network Center offers a differing variety of programs, including: adult basic skills education and GED preparation; computer skills classes (basic computer skills, how to use Microsoft Word, Excel, PowerPoint, how to use email and/or the internet); assistance in job search; and other adult and youth programming. In addition, there are times scheduled for open labs when seniors, adults and youth can use the lab as they wish. There are monthly schedules of classes and activities for each Neighborhood Network Center.

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

Choice Neighborhood Case Managers: HACM currently has six case managers for the Westlawn Gardens CNI grant. 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.

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.

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 (WRTP)/Big Step, Milwaukee Area Technical College (MATC), 4Cs (Child care training), and other training programs.

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

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 \$8 for every \$1 saved, with a maximum account level of \$500 in actual participant savings and total with match of \$4,500. 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 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. Saturated patrols 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. 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.

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

No changes. The HACM will continue to maintain compliance with the Asset Based Management regulations. The continued underfunding in operating subsidy 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 20% 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

There are no changes to this section.

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, 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:

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).

Mixed Finance Modernization and Development:

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

Current award statuses include:

- 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 (2019 9% Low Income Housing Tax Credit award) had its financial closing in December 2019 with an estimated completion December 2021 (120 units).
- Becher Court (2019 9% Low Income Housing Tax Credit award) had its financial closing in June 2020 with an estimated completion December 2021(120 units).
- Westlawn Renaissance VI (2019 4% Low Income Housing Tax Credit award) had its financial closing in April 2020 with an estimated completion December 2021 (138 units).
- Westlawn Renaissance IV (2020 9% Low Income Housing Tax Credit award) has an estimated closing date of October 2020 with estimated completion December 2021.

In late 2020 and/or 2021 , 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:

- Westlawn Renaissance V for 44 units, including 20 reserved for youth aging out of foster care.
- Westlawn Renaissance VII for 79 units.
- A combined application for Highland Gardens (114 units) and Townhomes at Carver Park (122 total units, 102 of them tax credit).

Demolition and/or Disposition: No new activities, other than the RAD update below.

Designated Housing for Elderly and/or Disabled Families: No new activities.

Conversion of Public Housing to Tenant-Based Assistance: No new activities.

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

As of 7/31/2020 HACM has RAD CHAP authority under a Portfolio Award for the following properties:

AMP	Property	Office Address	Units	Type
WI002000046	CARVER PARK, LLC	1901 N. 6 th Ave.	51	PBV
WI002000060	SCATTERED SITES - HHOMES	1818 W. Juneau Ave.	56	PBV
WI002000063	SCATTERED SITES-CHERRY	1525 N. 24 th St.	70	PBV
WI002000016	SCATTERED SITES N & WEST	5003 W. Lisbon Ave.	144	PBV
WI002000070	WESTLAWN	6419 W. Custer Ave.	394	PBV

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 - DEMO	5003 W. Lisbon Ave.	61	PBV
WI002000016	SCATTERED SITES N & WEST	5003 W. Lisbon Ave.	144	PBV
WI002000061	SCATTERED SITES- SOUTH	P.O. Box 772	64	PBV
WI002000011	COLLEGE COURT	3334 W. Highland Blvd.	251	PBV
WI002000001	HILLSIDE	1419 N. 8 th St.	470	PBV
WI002000019	LINCOLN COURT	2325 S. Howell Ave.	110	PBV
WI002000015	LOCUST COURT	1350 E. Locust St.	230	PBV
WI002000017	MITCHELL COURT	2600 W. National Ave.	100	PBV

Occupancy by Over-Income Families – No new activities.

Occupancy by Police Officers – No new activities.

Non-Smoking Policies:

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. No new activities.

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.

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 98 units across 12 different elderly/mixed population and family developments into the Undergoing Modernization sub-category. HACM anticipates it will make a similar request in 2021.

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

The Housing Authority is utilizing a previous year Emergency Safety and Security grant to modernize and install additional cameras in the Hillside Terrace, Parklawn and Westlawn Gardens developments. HACM may apply for an Emergency Safety and Security Grant.

B.3 Civil Rights Certification Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*--**Attachment B****B.4 Most Recent Fiscal Year Audit**

No findings in the most recent Fiscal Year Audit (calendar 2018).

B.5 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. Complete Revitalization and Preservation Planning for Hillside AMP.

2021

1. Complete rehabilitation of Merrill Park and Becher Court projects
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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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. 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.

2022

1. Complete Housing Construction for all RAD Replacement units
2. Complete relocation of Westlawn West Residents back to Westlawn Gardens
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.

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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

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

- Neighborhood: Critical Community Improvements continue, including: At least \$225,000 in loans from the Small Business Revolving Loan fund that is administered by WWBIC for businesses expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 76th Street Plaza and other businesses; and planning work continues for Placemaking projects.

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

1. Submit Sec 18 disposition plan for Scattered Sites:
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
2. 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
3. Evaluate avenues for potential repositioning of other AMPs:
AMP WI002000013 Arlington Court
AMP WI002000011 College Court
AMP WI002000001 Hillside Terrace
AMP WI002000046 Townhomes at Carver Park
AMP WI002000019 Lincoln Court
AMP WI002000015 Locust Court
AMP WI002000017 Mitchell Court
AMP WI002000007 Parklawn
AMP WI002000062 Riverview
4. 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

1. Develop Plan for Parklawn AMP repositioning or revitalization

2022

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

2.4 Utilize excess units on Annual Contribution Contract (ACC) Faircloth Limit.

Objectives by year:

2020

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

2021

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

2022

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

2.7 Continue to implement programs for Self Sufficiency.

Objectives by year:

2020

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

2021

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

2022

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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).

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Objectives by year:

2020

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

2021

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

2022

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

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

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses

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.

B.6 Resident Advisory Board (RAB) Comments. See Attachment B.

B.7 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 C.

B.8 Troubled PHA.

HACM is not a troubled PHA.

C. Statement of Capital Improvements. Required for PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).

C.1 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.

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.

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. Annual Plan. All PHAs must complete this section.

B.1 Revision of 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. 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 and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(ii))

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

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

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

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

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

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

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)) 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 under Section 3 and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention.** 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. Should the PHA fail to define "significant amendment/modification", HUD will consider the following to be "significant amendments or modifications": a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii))

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

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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

☐ **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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

☐ **Demolition and/or Disposition.** Describe any public housing 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; 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. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected. **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.** 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.** 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 assistance under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](#)

☐ **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](#). (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 Civil Rights Certification. Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, 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 AFFH Certification if: it can document that it examines its programs and proposed programs to identify any 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))

B.4 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))

B.5 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.6 Resident Advisory Board (RAB) comments. If the RAB provided comments to 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)

B.7 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

B.8 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. 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)

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

C.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX."

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 9.2 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.