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2020-2024 FIVE YEAR CONSOLIDATED2020-2024 FIVE YEAR CONSOLIDATED PLAN & STRATEGY PLAN & STRATEGY

City of Milwaukee, WI

To be submitted to the U.S. Department of Housing & Urban Development by the:

Community Development Grants Administration Steven L. Mahan, Director City Hall – 600 East Wells Street, Room 606 Milwaukee, Wisconsin

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Introduction

The Community Development Block Grant program was established by Congress in 1974 with the passage of the Housing and Community Development Act. This program provides funds to municipalities and other units of government around the country to develop viable urban communities. This is accomplished by providing affordable, decent housing, a suitable living environment and by expanding economic opportunities principally for low and moderate income persons. Over a 12-month period, the 2020-2024 City of Milwaukee HUD Consolidated Plan process utilized a comprehensive set of community outreach and input activities, analysis of housing and economic data, and review of other community plans to identify and summarize the community needs and strategic opportunities.

Local units of government develop their own programs and funding priorities, however all activities must be consistent with one or more of the following HUD national objectives:

- Principally benefits low/moderate income persons
- Prevents or eliminates slum or blight
- Addresses an urgent need or problem in the community (e.g., natural disaster)

As a Participating Jurisdiction (PJ) and entitlement community, the City of Milwaukee-Community Development Grants Administration (CDGA), receives annual funding allocations from the Federal government to fund activities to address these National Objectives. As a recipient of these funds, every five years the City of Milwaukee is required to submit to HUD a Consolidated Plan and Strategy that defines the direction the City will take in utilizing these Federal funds to address the national objectives in a manner that will produce the greatest measurable impact on our community.

The statutes for the Federal formula grant programs set forth three basic goals against which the plan and the City's performance under the plan will be evaluated by HUD. The City must state how it will pursue these goals for all community development programs. The HUD statutory program goals are:

1) **DECENT HOUSING - which includes:**

- Assisting homeless persons obtain affordable housing;
- Assisting persons at risk of becoming homeless;
- Retaining the affordable housing stock;
- Increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged communities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- Increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence; and
- Providing affordable housing that is accessible to job opportunities.

2) A SUITABLE LIVING ENVIRONMENT - which includes:

- Improving the safety and livability of neighborhoods;
- Eliminating blighting influences and the deterioration of property and facilities;
- Increasing access to quality public and private facilities and services;
- Reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods; and
- Restoring and preserving properties of special historic, architectural, or aesthetic value; and conserving energy resources and use of renewable energy sources.

3) EXPANDED ECONOMIC OPPORTUNITIES- which includes:

- Job creation and retention;
- Establishment, stabilization and expansion of small businesses (including micro-businesses);
- The provision of public services concerned with employment;
- The provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- Availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- Access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- Empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

The long-term outcomes linked to these goals are:

- 1. **Availability/Accessibility** Programs/activities that make services, housing, infrastructure, public services, or shelter accessible or available to low or moderate income persons, including those with special needs and/or disabilities.
- 2. **Affordability** Programs/activities that provide affordability to low or moderate income persons; can include affordable housing development/preservation.
- 3. **Sustainability** Programs/activities that improve communities and promote viability such as removing slum and blight or other services that sustain communities.

For the most part, this Consolidated Plan is focused on how to best spend Federal HUD dollars. There is some discussion on the need for quality schools, government expenditures for human services, or on the impact of personal life decisions - all of which impact economic stability. While those are all key issues, they are not within the scope of this Consolidated Plan for the City of Milwaukee's use of Federal funds. While the Consolidated Plan does not directly address these issues as strictly defined, many of the programs funded by the Community Development Grants Administration, (CDGA) have an impact on these concerns and more importantly, bring value to Milwaukee's diverse neighborhoods. The City of Milwaukee and CDGA will continue to strive to address the needs of Milwaukee's residents, while promoting programs and activities that will provide the greatest benefit for our community.

Resources

Many activities identified in the Consolidated Plan are under the direct control and supported by the following Federal entitlement funds which are administered by the Community Development Grants Administration:

Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions

Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). Other Federal and State funds (such as federal relief programs) will also be used for proposed activities.

Leveraging Funds

CDGA is committed to leveraging funding resources from other types of public and private sources for community development projects funded through CDGA. The projects receiving Emergency Solutions Grant (ESG) funds will utilize CDBG funds and agency private funds and donations to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds will be used in conjunction with shelter related activities.

The housing rehabilitation projects will leverage funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. Low Income Housing Tax Credits (LIHTC) directly provide a needed subsidy in low-income rental projects by selling the credits to investors. Matching funding for the HOME program will include Housing Trust Fund projects and other housing activities undertaken by the City of Milwaukee. HOME funds are also sometimes combined with CDBG funds and/or private funds.

Economic development funds will complement projects from the Department of Justice, Safe Havens, which directly impact community security and safety issues.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding. The strategies and recommendations outlined in the document attempt to balance the needs and priorities of our community and as identified in the data analysis, with the availability of funds.

Impact of the COVID-19 Public Health Pandemic

At the time of this writing, Milwaukee County has reported over 85,000 cases and nearly 860 deaths as a result of coronavirus. With the economic impact of COVID-19 becoming more and more apparent, we anticipate that more households are at risk of becoming housing insecure due to a significant loss of income and decreasing resources for temporary rent assistance. Additionally, we anticipate that public services will be stretched, even as the City's response must increase, particularly within the central City of Milwaukee where COVID-19 has taken a tremendous toll on our African-Americand and Hispanic residents.

Summary of the Objectives and Outcomes Identified in the Plan

As America's demography is changing, so too is the City of Milwaukee. While the City's total population has been relatively stable since 2000, the dynamics of who lives in the City has changed. The percentage of the City's population that identifies as non-White has grown, driven primarily by significant growth in the Latino/Hispanic population. Milwaukee's continued standing as one of the most segregated cities and metro areas in the country and the legacy of past "redlining" practices continues to manifest in deep racial and economic inequalities in the region, including a persistent and startling racial wealth gap. Working to reverse the impact of these historical disparities requires a consistent focus on both programs and policies that directly address them.

One of the driving market conditions in the City of Milwaukee is that median household income in the City has fallen over the last two decades. In real dollars, Milwaukee households earn \$6,000/year less than they did in 2000, and the economic impacts of COVID-19 on low-income residents in particular cannot be overstated. Reducing racial disparities in terms of median household income, housing cost burden, and homeownership rates are a major focus for much of the economic and community development work currently underway in the City.

In recent years the City of Milwaukee and community stakeholders have undertaken significant interest in, and efforts to address affordable housing issues. The City completed reports and plans such as the 2019 Housing Affordability Report, 2018 Anti-Displacement Plan, Strong Neighborhoods Plan, Comprehensive Plan, and Mayor Tom Barrett's 10,000 Homes Initiative. These efforts have been complemented by outside research such as the 2020 Analysis of Impediments to Fair Housing (a regional report), VISION 2050 (Southeastern Wisconsin Regional Planning Commission - regional transportation and land use plan), and policy analysis carried out by the Wisconsin Policy Forum and Community Advocates Public Policy Institute. [A list of these resources can be found in the Appendix.]

Anti-Poverty

The City's Anti-Poverty Strategy falls within four areas: Economic opportunity, Transportation, Housing, and Quality of life. This holistic approach recognizes that poverty is systemic, and solutions should cut across sectors and issue areas. The strategy has a specific focus on increasing access to, and creating, opportunities for residents to earn a livable, family-supporting wage. This includes support of programs and initiatives that assist in removing barriers to employment for low income households and that help stabilize their housing (i.e. walk-to-work programs; wrap around social, educational, employment and life skills services). City departments have utilized a variety of tools to work cooperatively with the nonprofit sector and the business community to leverage employment and economic activity in targeted areas to spark creative approaches that focus on jobs.

Other activities that support **Neighborhood Revitalization and Quality of Life** include small businesses assistance; access to civil legal services and financial education; programs that provide support to seniors and people with disabilities; expansion of public transit and other transportation options; protections for tenants and efforts to prevent eviction; youth engagement and services; resident leadership and community organizing programs; violence prevention initiatives; neighborhood cleanups; access to community-based health services; and maintenance/improvement of public spaces.

CDGA will continue planned aggressive blight elimination efforts, support active citizen participation in monitoring problem properties, integrating crime prevention into a variety of city services and capital improvements, and organizing efforts to improve quality of life issues that encourage the economic integration and revitalization of neighborhoods.

Economic and Community Development

The City's Economic and Community Development Strategy complements its Anti-Poverty strategy by emphasizing how interconnected employment, access to economic opportunity, and affordable housing are to each other. In terms of resources and implementation, Milwaukee will continue its commitment to cluster-based and large impact developments, along with leveraging strategic partnerships across city departments, with funders, and with community-based organizations. There is consensus that public and private sector funding should be focused on tangible outcomes leading to neighborhood revitalization and the creation of jobs, income and wealth. This model of comprehensive planning is embraced by the residents in target areas as the emphasis is focused on housing improvement, job creation and income enhancement.

Housing

The city devotes significant resources to expand the creation of affordable housing through the provision of city financial resources, staff expertise, city land, and policy actions. The Housing Strategy will leverage the infrastructure of the City's Strong Neighborhoods program, Housing Trust Fund, Housing Authority of the City of Milwaukee (HACM), and public-private partnerships to expand the availability of of affordable rental housing, increase homeownership opportunities, eliminate blight, rehabilitate units for owner-occupancy, provide home maintenance and repair assistance, prevent eviction and improve housing stability.

Other priorities include expanding efforts to assist public housing and Section 8 residents move to private market unsubsidized housing, provide better training, advocacy and mediation services for landlords and tenants, and increase the number of rent-assisted housing units and their geographic distribution throughout the metropolitan area and Milwaukee County. Strategies to address these issues include placing households in either Section 8 or public housing units as turnover occurs and to substantially rehabilitate rental units through the Rent Rehabilitation program.

The social determinants of health have become an increased focus of health care systems and providers, noting how housing conditions affect the well-being of their patients and communities. Identifying and pursuing strategies that link housing and health could bring new resources in efforts to improve access to safe, affordable housing in Milwaukee.

The City's **Public Housing Improvement Strategy**, which aligns with the Consolidated Plan, includes the following activities: provide opportunities for resident participation through economic development and homeownership programs; and connect residents to supportive services offered through drug elimination grants and economic development and supportive services (ED/SS) grants at all its public housing developments. Residents are also directly involved in the evaluation of program outcomes and in the determination of the level of satisfaction with facilities and services offered by the Housing Authority. Other initiatives include the Housing Authority's commitment to expand their efforts to assist public housing and Section 8 residents to move to private market unsubsidized housing and the portability of residents who wish to relocate to other communities outside the City.

These strategies also link job creation to the City's housing development efforts, expand access to new resources for neighborhood development, and support coordinated housing and neighborhood efforts with other human service and economic development initiatives.

Homelessness and Special Needs Populations

The City of Milwaukee will continue its active support of, and partnership with, Milwaukee's Continuum of Care (CoC) to implement the following strategies: Prevent homelessness and increase outreach; Assess and adapt emergency shelter and transitional housing to meet shifting needs; Secure safe shelter sooner (via Rapid Re-Housing); Transition to permanent housing; Shorten the duration of homelessness; and Strengthen connections with service providers that work with special needs populations.

Much like the supportive service needs of persons experiencing homelessness, access to safe, affordable housing, and services such as employment and job training, legal services, healthy food, mental and physical health care in particular would benefit the special needs populations identified in the Needs Assessment. These groups include: Individuals Living with HIV/AIDS, Seniors/Elderly, People with Disabilities, Veterans, Formerly Incarcerated, and Immigrants/Refugees.

To reduce homelessness and meet the needs of special needs populations, housing and service providers are seeking new ways to work across systems and engage those resources to address gaps, particularly in accessing employment and income supports, and behavioral health services. Additionally, the impacts of the COVID-19 pandemic on the CoC and system of homeless service providers has been significant. Limitations on shelter capacity, increases in street homelessness, and shifts in how services are delivered have been challenging but have also led to innovative approaches to providing safe shelter and connecting people to housing navigation and supportive services. A lot has been learned within Milwaukee's CoC and the homeless system that can be applied to the strategies outlined in the Consolidated Plan.

Addressing Lead-Based Hazards

The impact of lead-based paint hazards are a continued focus and concern for the City especially given the age of Milwaukee's housing stock. Strategies include: Regular evaluation of lead abatement methods, continuation of a program of grants/loans to assist homeowners and landlords in removing lead hazards, continuing collaborative efforts with other housing programs to identify lead abatement and lead hazard reduction into total housing rehabilitation, expanding education and training for homeowners, landlords and tenants regarding lead poisoning prevention and securing city, state and federal funding to finance lead hazard reduction activities.

Fair Housing and Fair Lending Practices

The City of Milwaukee will continue to support the enforcement and education of fair housing ordinances with community partners and the City's Equal Rights Commission that help remove barriers to affordable housing. Additionally, the City works with local partners to complete an annual review of lending practices and patterns by area financial institutions, and promote best practices in terms of reaching underserved communities. The city also engages a number of community-based organizations to affirmatively work toward integrated housing patterns and respond to affordable housing issues such as predatory lending, eviction, foreclosure, and related consumer issues.

Evaluation of Past Performance

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) is submitted to HUD following the end of each program year which ends on December 31st. The CAPER provides an account of activities, accomplishments, and expenditures that occurred during the previous program year, and progress towards the 5-year Strategic Plan. It includes reporting on the HUD Objectives and Outcomes, performance indicators, and unit benchmarks and production.

The most recent City of Milwaukee CAPER (FY 2019) reported the following outcomes for the 2014-2019 Strategic Plan. The data below covers five (5) years of activity:

- 5,412 housing units rehabilitated (owner and rental)
- 3,061 households assisted with tenant-based rent assistance and rapid re-housing funds/services
- 3,938 persons assisted with homeless prevention services
- 32,739 persons provided with emergency shelter/services
- 20 brownfield sites remediated
- 236 jobs created/retained
- 49,698 residents received public services in the City's Neighborhood Strategic Planning (NSP) areas
- 3,089,125 residents overall were engaged in community improvement efforts

Overall, the City exceeded strategic target goals in the rehabilitation of housing units, remediation of brownfields, and residents receiving public services. Goals related to homeownership, homeless prevention, addressing housing code violations, fair housing outreach, and job creation/retention were close to strategic targets (between 68-95%).

Highlights from the 2014-2019 5 Year Plan include:

- Continued focus on affordable housing preservation and production (both owner and rental).
- Full implementation of the Coordinated Entry system to assist people at risk for, or experiencing homelessness.
- Increase in permanent supportive housing, homeless prevention, street outreach services, and rapid re-housing activities to improve housing stability.
- Provided supportive housing services to individuals living with HIV/AIDS in the 4-county area; education, outreach, and referrals to individuals and families in the Milwaukee MSA.
- Participation in the Choice Neighborhoods Initiative, resulting in a significant investment that transformed the Westlawn public housing development.
- Support of fair housing enforcement and outreach, inclusionary housing policies, and eviction prevention activities.
- Development of a city Anti-Displacement plan and partnership with cross-sector groups to create an Anti-Displacement Fund, guidelines for the use of Tax Incremental Financing (TIF) funds to support affordable housing goals, and developing a Strategic Acquisition fund.
- Supported the "Move to Opportunity" program and other rent assistance/affordable housing efforts.
- Made significant improvements in the Milwaukee Health Departments lead abatement programs to increase intervention and outreach services.
- Work collaboratively with other public, nonprofit and private sector groups to advance anti-poverty programs and services such as workforce-based training, education and mentoring; skilled trades and

- high-tech training; transitional jobs for ex-offenders; small business technical assistance; access to homeownership; youth services; violence prevention; and community safety.
- Completion of a strategic plan for the Equal Rights Commission to strengthen its representation, activities, and partnerships in the community, particularly around accessibility and racial equity and inclusion.

These activities were leveraged with funds from HUD Emergency Solutions Grants (ESG), HOME funds, HOPWA funds, State funds, Low Income Housing Tax Credits, US. Department of Justice, and private philanthropy.

The 2019 City of Milwaukee CAPER can be viewed HERE in detail.

Also, the City and its partners have undertaken significant efforts to plan for and track efforts to establish and maintain safe, affordable housing in recent years. The city's Comprehensive Plan, Housing Affordability Report, Anti-Displacement Plan, Strong Neighborhoods Plan, Mayor Tom Barrett's 10,000 Homes Initiative, Analysis of Impediments to Fair Housing, and policy analysis carried out by the Wisconsin Policy Forum Community Advocates have added new ways to track this activity.

For example, in February 2020 the City of Milwaukee 10,000 Homes Initiative reported that from 2018-2019: 582 new housing units were created; 1,016 existing housing units were preserved or improved; 494 individuals were assisted in home buying; and 2,092 housing units were impacted by City resources.

The objectives, outcomes and goals for the 2020-2024 Consolidated Plan are based on past activity as described in the CAPER, as well as new opportunities that are emerging to address the need for safe, affordable housing in the City of Milwaukee as described throughout the Market Analysis and Strategic Plan sections.

Summary of the Citizen Participation Process and Consultation Process

Lead Agency

The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration (CDGA). The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee (CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. Additional information on the funding and allocation process is described in section PR-05 (Lead and Responsible Agencies).

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan in 1991. The plan outlines the procedures and processes used by the City to solicit citizen input and has since been updated and revised; the document was subsequently submitted and approved by HUD.

Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons, defined as those with incomes of 80% or less of Milwaukee's Area Median Income (AMI). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas (NRSAs), of which at least 70% of all residents are considered low income.

2020-2024 Consolidated Plan Process

In 2019 CDGA contracted with the Urban Economic Development Association of Wisconsin (UEDA), a local nonprofit organization that specializes in technical assistance, to help develop the Consolidated Plan. In partnership with the City, UEDA formed a robust team of community leaders representative of the community and economic development sector that became known as the Consolidated Plan Task Force.

The Task Force met a number of times over the 18 month planning process, providing feedback on the community survey, focus groups, ConPlanMKE website, and various drafts of the plan. Task Force members also distributed the survey and invitations to participate with their networks, focusing particularly on residents and youth. With the plan now in the public comment period, the Task Force is a vital part of ensuring that citizens and interested parties have the opportunity to provide feedback and are involved in the final production of the plan.

UEDA's project team also consulted a number of data sources in the drafting and preparation of the Consolidated Plan, including other City departments (City Development, Health, Neighborhood Services); the Housing Authority of the City of Milwaukee (HACM), Milwaukee Continuum of Care, and local data consultants Data You Can Use. A review of recent research, plans and policy analysis was also conducted by UEDA, which is detailed in the Appendix.

Community input included the use of a community survey (both paper/in-person and electronic), focus groups, community meetings in key Neighborhood Strategic Planning (NSP) areas, and outreach/engagement at a number of neighborhood events in 2019. Priorities and goals as described in the Needs Assessment, Market Analysis, and Strategic Plan sections were all formulated from broad-based participation of residents,

various stakeholders, community-based service providers, faith-based institutions, businesses, schools, and neighborhood groups. Additional detail on this process is described in sections PR-10 (Consultation) and PR-15 (Citizen Participation).

The Consolidated Plan will be posted for public comment at the City of Milwaukee website and project website, <u>ConPlanMKE.org</u>. Because in-person / public meetings are not possible at this time due to the high rate of COVID-19 infections, notification will be distributed largely through electronic tools (e-mail via UEDA and E-Notify, the Task Force, social media). Additionally, UEDA will host an informational webinar in early January 2021 that is open to the public; it will be recorded and posted for future viewing.

Summary of public comments

The 2020-2024 City of Milwaukee HUD Consolidated Plan was posted for public comment from January 8, 2021 through February 9,, 2021. All public comments received will be compiled and included in the Appendix when the final draft is complete.

Summary of comments or views not accepted and the reasons for not accepting them

All comments on the Consolidated Plan will be accepted and considered in the Plan.

Summary

The Community Development Grants Administration (CDGA) has defined a 5-year Housing and Community Development Strategy for 2020-2024 that focuses on supporting vibrant neighborhoods, ensuring decent housing, and providing economic opportunity for all community residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and social service providers. Funding allocations follow a comprehensive approach aligned with the strategies as described in this Consolidated Plan.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for the administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MILWAUKEE	Community Development Grants Administration
HOPWA Administrator	MILWAUKEE	Community Development Grants Administration
HOME Administrator	MILWAUKEE	Community Development Grants Administration
ESG Administrator	MILWAUKEE	Community Development Grants Administration
Fiscal Administration and	MILWAUKEE	City Comptroller's Office
Management		

Table 1 - Responsible Agencies

Narrative

The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration (CDGA). The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee (CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor.

CDGA annually solicits and evaluates applications from all interested parties through an open and competitive Request For Proposal (RFP) process. The funding categories for the RFP process receive input from the community at large and are finalized by the CED Committee and Mayor. Recommendations for annual funding are made to the CED Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons, defined as those with incomes of 80% or less of Milwaukee's Area Median Income (AMI). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas (NRSAs), of which at least 70% of all residents are considered low income.

City's Notification Requirement Regarding Draft Plan Availability

The Consolidated Plan will be posted for public comment at the City of Milwaukee website (www.city.milwaukee.gov/CDGA) and project website (ConPlanMKE.org). The notification will describe the

contents and purpose of the plan, and will state that copies of the plan will be available for review on the City's website, the City's Legislative Bureau and the offices of CDGA.

Physical copies will also be available upon request. The City will make the Plan(s) public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by the Citizen Participation Plan. The City will consider any comments or views of citizens received in writing (mail /e-mail) during the 30-day public review and will address those comments in the Plan. In preparation of the final Consolidated Plan, or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

Because in-person / public meetings are not possible at this time due to the high rate of COVID-19 infections, notification will be distributed largely through electronic tools (e-mail via UEDA and E-Notify, the Task Force, social media). The public can provide feedback to a specific email address (comment@conplanmke.org), in writing or by phone (see below for contact information). Additionally, UEDA will host an informational webinar in early January 2021 that is open to the public; it will be recorded and posted for future viewing at the project website (ConPlanMKE.org).

Criteria for Substantial Amendments to the Consolidated Plan and Annual Action Plan

The City of Milwaukee shall prepare a substantial amendment to its Consolidated Plan and/or Annual Action Plan(s) plan using the following criteria:

- 1. Whenever eligible activity categories proposed for funding are not listed in the City's current Consolidated Plan or Annual Action Plan:
- 2. Whenever there is a change in the purpose, scope, location or beneficiaries of an activity.

If there are amendments to the Consolidated Plan and/or Annual Action Plan(s), the City of Milwaukee will solicit citizen participation, including public hearings, in conformance with its Citizen Participation Plan.

Performance Reports

Further citizen involvement is affected by the provision of Accomplishment Reports that identify the annual goals of each program funded and the status of the activities at each quarterly reporting period. This allows concerned citizens and other stakeholders the opportunity to determine if program/service providers working in their planning areas are delivering the services as funded.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) will be submitted to HUD by March 31st following the end of each program year which ends on December 31st. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

The City will publish a notice in at least two local newspapers regarding the availability of the CAPER, which will begin the 30-day review and comment period. The notice and the draft CAPER will also be made available to the public via the City's website, City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report.

Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

The Community & Economic Development Committee will hold a hearing on the CAPER. Each public hearing notice will include the availability of an interpreter if requested by non-English speaking or hearing-impaired persons that expected to participate at the hearing.

Consolidated Plan Public Contact Information

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comment@conplanmke.org

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

Introduction

In 2019 CDGA contracted with the Urban Economic Development Association of Wisconsin (UEDA), a local nonprofit organization that specializes in technical assistance, to help develop the Consolidated Plan and ensure broader citizen participation. In partnership with the City, UEDA formed a robust team of community leaders representative of the community and economic development sector that became known as the Consolidated Plan Task Force.

UEDA's project team also consulted a number of data sources in the drafting and preparation of the Consolidated Plan, including other City departments (City Development, Health, Neighborhood Services); the Housing Authority of the City of Milwaukee (HACM), Milwaukee Continuum of Care, and local data consultants Data You Can Use. A review of recent research, plans and policy analysis was also conducted by UEDA, which is detailed in the Appendix.

Community input included the use of a public website (<u>ConPlanMKE.org</u>), community survey (both paper/in-person and electronic), focus groups, community meetings in key Neighborhood Strategic Planning (NSP) areas, and outreach/engagement at a number of neighborhood events in 2019. Further detail on these efforts is included in section PR-15 (Citizen Participation) and the Appendix.

Priorities and goals as described in the Needs Assessment, Market Analysis, and Strategic Plan sections were all formulated from broad-based participation of residents, various stakeholders, community-based service providers, faith-based institutions, businesses, schools, and neighborhood groups.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(I)).

The City of Milwaukee conducts numerous activities in coordination with various units of government including Milwaukee County, the State of Wisconsin and various jurisdictions in southeastern Wisconsin, such as Wauwatosa, West Allis, Cudahy, Waukesha, etc. These activities include shelter, regional transportation, workforce issues, and joint cooperation on a Regional Analysis of Impediments to Fair Housing.

The City of Milwaukee is also active in the following public-private partnerships:

- 1. City of Milwaukee / Milwaukee County Continuum of Care
- 2. City of Milwaukee Housing Trust Fund (various housing providers)
- 3. Employ Milwaukee (workforce investment board)
- 4. Fund My Future (children's savings account initiative)
- 5. Bankers Roundtable (group of area financial institutions focused on community investment)
- 6. Bank On Greater Milwaukee (access to banking and financial stability services)

- 7. Community Development Alliance (CDA funders alliance that will focus on housing starting 2021)
- 8. Greater Milwaukee Committee (Scale-Up, The Commons)
- 9. Environmental sustainability through the ECO department
- 10. Lead abatement efforts (trainees learn effective lead-safe work practices while addressing lead hazard issues affecting City residents)
- 11. Local Initiatives Support Corporation (LISC) programs such as Associates in Commercial Real Estate (ACRE), Brew City Match, etc.
- 12. Milwaukee 7 (regional, cooperative economic development consortium)
- 13. Milwaukee Health Care Partnership
- 14. Milwaukee Rental Housing Resource Center (formed in 2020, eviction prevention)
- 15. MKE United Greater Downtown Action Agenda
- 16. Social Development Commission (SDC) Milwaukee County's designated Community Action Agency (CAA)
- 17. Southeastern Wisconsin Regional Planning Commission (SEWRPC)
- 18. Take Root Milwaukee (sustainable homeownership initiative)
- 19. Various neighborhood initiatives led by community-based organizations and philanthropic community (Building Neighborhood Capacity Program, Healthy Neighborhoods, Near West Side Partners, Zilber Neighborhood Initiative)
- 20. WHEDA (state housing finance agency; responsible for Low Income Housing Tax Credits and homeownership programs

COVID-19 Pandemic Response

The City continues to work with the MKE Civic Response Team, a philanthropic coalition that formed immediately in the aftermath of public health restrictions and shutdowns. Not only have they announced significant contributions specifically for COVID-19 related impacts through the "MKE Responds" fund, but continue to coordinate the community response to the COVID-19 pandemic, working closely with the City of Milwaukee and a diverse array of community-based stakeholders in the following areas: 1) Early Childhood Education; 2) Economic Recovery; 3) Food Security; 4) K-12 Education; 5) Mental Health; 6) Physical Health; and 7) Shelter/Housing.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The mission of the City of Milwaukee and Milwaukee County Continuum of Care (CoC) is to organize people and resources to end homelessness in Milwaukee. The City of Milwaukee is the lead support agency to the CoC, providing staff to various committees and workgroups. The CoC is comprised of service providers, volunteer committees and networking/task force groups which have various roles and responsibilities to fulfill the mission of the CoC. The CoC has established numerous partnerships with local and regional entities with expertise in developing, operating and maintaining permanent supportive housing for homeless persons.

IMPACT serves as the Coordinating Agency for the Milwaukee Coc Coordinated Entry System. The CoC continues to work on strengthening partnerships with behavioral and physical health institutions so those being discharged are in contact with the Coordinated Entry System for connection to both permanent and emergency housing.

The resources and strategies employed by the Milwaukee CoC are described in greater detail in sections MA-30 (Homeless Facilities and Services), MA-35 (Special Needs Facilities and Services), and SP-60 (Homelessness Strategy).

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies, and procedures for the administration of HMIS.

The Milwaukee City-County CoC makes decisions on the allocation of ESG funds, performance standards and outcomes, and policies and procedures for coordinated entry and the administration of the Homeless Management Information System (HMIS).

The State of Wisconsin Department of Administration-Division of Housing contracts with the Institute for Community Alliances (ICA), a nonprofit that functions as the HMIS Lead Agency and/or HMIS administrator in 14 states, including Wisconsin. They are responsible for the maintenance, oversight, security and information collected as part of the HMIS. Services provided to the Milwaukee CoC include assessments of current reporting needs, training for agency system users, leading the Point-In-Time process, and providing required HUD reports.

Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies, and other entities

Traditionally, the City of Milwaukee has used its Federal entitlement funds to creatively respond to needs identified through the planning process. Community-based organizations are essential partners to strengthen the social and economic infrastructure of Milwaukee's neighborhoods, and they were a cornerstone of the community input process.

The Consolidated Plan was developed through a collaborative process involving a task force and consultation from representatives from numerous entities such as housing, youth, homelessnesses, persons with HIV/AIDS, economic development and jobs, persons with special needs and/or disabilities, philanthropy, policy/research, neighborhood groups, City departments, Milwaukee County, residents and others from the private sector.

UEDA worked with the City in a number of ways to engage different groups/organizations in the Consolidated Plan process. This included:

- 1) Convening a Task Force to guide and provide feedback, particularly related to community engagement and input. The Task Force met a number of times over the 18 month planning process, providing feedback on the community survey, focus groups, ConPlanMKE website, and various drafts of the plan. They also distributed the survey and invitations to participate with their networks, focusing particularly on residents and youth. With the plan now in the public comment period, the Task Force is a vital part of ensuring that citizens and interested parties have the opportunity to provide feedback and are involved in the final production of the plan. See the next page for a Task Force Roster.
- 2) **Consultation with a wide range of data sources**, including other City departments (City Development, Health, Neighborhood Services); the Housing Authority of the City of Milwaukee (HACM), Milwaukee Continuum of Care, and local data consultants Data You Can Use. A review of recent research, plans and policy analysis was also conducted by UEDA, which is detailed in the Appendix.
- 3) **Hosting a series of focus groups on specific topics**, to allow for more targeted feedback and discussion. These sessions were open to the public and held both during the day and evening to allow for broad participation. Attendees included both sector professionals and interested citizens. Focus group topics were Housing, Youth Services, Small Business/Commercial Corridors. UEDA also worked with AREA, the consultant performing the regional analysis of fair housing, to co-host the Housing sessions.
- 4) Working with Neighborhood Strategic Planning (NSP) organizations to host community meetings, distribute and share the community survey, and gain resident feedback on needs and priorities for the Consolidated Plan. Four NSP meetings were held, covering the largest NSP areas on the near North and near South sides of Milwaukee. A list of the NSP agencies is included below.
- 5) **Attending 15+ community-wide and neighborhood-based events** in the Summer-Fall 2019, to engage residents by sharing the community survey (paper and electronic) and inviting them to public meetings and focus groups to gain resident feedback.

2020-2024 City of Milwaukee HUD Consolidated Plan Task Force

First Name	Last Name	Organization/Affiliation	Area(s) of Focus
Bill	Kopka	Associated Bank	Housing, Economic Development, Community Investment
Larry	Kilmer	City of Milwaukee - Department of City Development	Housing, Community and Economic Development
Tom	Mischefske	City of Milwaukee - Department of Neighborhood Services	Housing, Neighborhood Stability
Jessica	Langill	City of Milwaukee - Equal Rights Commission	Access to Equal Opportunity & Fair Housing
Andi	Elliot	Community Advocates	Housing Stability, Homelessness, Anti-Poverty, Special Needs Populations
Rob	Cherry	Employ Milwaukee	Employment and Workforce
Janel	Hines	Greater Milwaukee Foundation	Community Needs, Philanthropy
Sarah	Greenberg	Greenberg Strategies	Housing, Community and Economic Development
Ger	Thao	Hmong Wisconsin Chamber of Commerce	Economic Development, Small Business Assistance
Tony	Perez	Housing Authority of the City of Milwaukee	Housing
Trena	Bond	Housing Resources, Inc.	Homeownership, Economic Opportunity
Brian	Peters	IndependenceFirst	Persons with Disabilities, Special Needs Populations
Michele	Bria	Journey House	Community and Economic Development, Neighborhoods
Kevin	Turner	Journey House	Community and Economic Development, Neighborhoods
Colleen	Foley	Legal Aid Society	Civil Legal Services, Fair Housing
Kori	Schneider-Peragine	Metro Milwaukee Fair Housing Council	Fair Housing
Karen	Higgins	Milwaukee Christian Center	Community Development, Youth/Social Services, Neighborhoods
John	Kaye	Milwaukee Christian Center	Housing, Community Development
Jim	Mathy	Milwaukee County	Housing Stability, Homelessness, Special Needs Populations
Michael	Stevenson	Milwaukee Health Department	Health and Housing, Lead-based Hazards
Tony	Baez	Milwaukee Public Schools	Education
Tony	Kearney	Northcott Neighborhood House	Housing, Youth/Social Services, Neighborhoods
Joe'Mar	Hooper	Safe & Sound	Community Safety, Youth Services

Bridget	Robinson	Safe & Sound	Community Safety, Youth Services		
George	Hinton	Social Development Commission	Wraparound Services, Anti-Poverty		
Jim	Hill	The Common Good, LLC	Housing, Homelessness and Special Needs Populations		
Ricardo	Diaz	United Community Center	Community Development, Housing, Education, Youth/Social Services, Neighborhoods		
Nicole	Angresano	United Way of Greater Milwaukee & Waukesha County	Community Needs, Philanthropy		
Lisa	Heuler Williams	UW-Milwaukee Center for Economic Development	Policy and Research		
Mike	Gifford	Vivent Health	Housing Opportunities for Persons with AIDS		
Saul	Newton	Wisconsin Veterans Chamber of Commerce	Economic Development, Small Business Assistance		
Matt	Waltz	WRTP/Big Step	Workforce Training, Employment, Economic Opportunity		
CDGA Staff		Community Development Grants Administration	Participating Jurisdiction - Recipient and Administrator of HUD Federal Funds		
Consolidated Plan Project Team		Urban Economic Development Association of Wisconsin	Technical Assistance, Planning; Community and Economic Development		

Neighborhood Strategic Planning Coordinating Agencies

The following agencies facilitate residents/stakeholder involvement in community improvement efforts such as crime prevention initiatives, neighborhood planning, door-to-door contacts that connect residents to resources, outreach/networking events, coordinated neighborhood cleanups, and other initiatives as specified by CDGA. Additionally, in coordination with the Milwaukee Police Department, NSP agencies establish and maintain block clubs/neighborhood watches/neighborhood stakeholder groups.

Additionally, the planning and implementation process is an ongoing, funded activity conducted by each of the NSP coordinating agencies. Monthly reports are submitted to CDGA detailing citizen and stakeholder planning and action on issues relating to identified long term outcomes. In addition NSP agencies assist the City with engaging residents around the annual funding allocation process (FAP).

NSP Area	NSP Agency
NSP 1	Northwest Side Community Development Corp.
NSP 2	Havenwoods Economic Development Corp.
NSP 3	Northwest Side Community Development Corp.
NSP 4	Northwest Side Community Development Corp.
NSP 5	Sherman Park Community Association
NSP 6	WestCare Wisconsin, Inc.
NSP 7	Riverworks Development Corp.
NSP 8	Boys & Girls Club of Greater Milwaukee
NSP 9	Dominican Center for Women, Inc.
NSP 10	Running Rebels, Inc.
NSP 11	United Methodist Children's Services of Wisconsin, Inc.
NSP 12	Safe & Sound, Inc.
NSP 13	Boys & Girls Club of Greater Milwaukee
NSP 14	Currently Assigned
NSP 15	Southside Organizing Center
NSP 16	Southside Organizing Center
NSP 17	Southside Organizing Center
NSP 18	Social Development Commission
NSP 19	Currently Unassigned

Identify any Agency Types not consulted and provide a rationale for not consulting

Not applicable. An open citizen/stakeholder process was conducted involving a broad sector of the community, engaging a diverse set of stakeholders. In addition, input was received through a community survey, focus groups, neighborhood meetings, and a Task Force.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan Lead Organization		How do the goals of your Strategic Plan overlap with the goals of each plan?			
Regional Analysis of Impediments to Fair Housing (2020)	The Collaborative formed by the Cities of Milwaukee, Wauwatosa, West Allis; and Counties of Milwaukee, Jefferson, Ozaukee, Washington, Waukesha (report prepared by AREA)	Decent Housing Expand Economic Opportunity Suitable Living Environment			
2019 Housing Affordability Plan	City of Milwaukee Department of City Development	Decent Housing Expand Economic Opportunity Suitable Living Environment			
2018 Anti-Displacement Plan	City of Milwaukee Department of City Development	Decent Housing Suitable Living Environment			
City Comprehensive Plan (includes all Area Plans)	City of Milwaukee Department of City Development	Decent Housing Expand Economic Opportunity Suitable Living Environment			
Blueprint for Peace -414 LIFE (2017)	City of Milwaukee Office of Violence Prevention	Suitable Living Environment Expand Economic Opportunity			
VISION 2050 Regional Land Use & Transportation Plan (2016)	Southeastern Wisconsin Regional Planning Commission (SEWRPC)	Decent Housing Expand Economic Opportunity Suitable Living Environment			
Strong Neighborhoods Plan (2015)	City of Milwaukee Department of City Development	Decent Housing Expand Economic Opportunity Suitable Living Environment			
Mid-Course Revisions: 10-Year Plan to End Homelessness (2015)	Milwaukee Continuum of Care	Decent Housing Expand Economic Opportunity			
Growing Prosperity Plan (2014)	City of Milwaukee Department of City Development	Expand Economic Opportunity			
RefreshMKE Sustainability Plan (2013)	City of Milwaukee Environmental Collaboration Office (ECO)	Suitable Living Environment			

Table 3 - Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

Narrative (optional)

The City of Milwaukee has a number of partnerships, with the recognition that collaborative approaches lead to stronger cooperation on housing, economic development, and quality of life issues. The City works with numerous institutions, organizations, public officials in State, County, and local jurisdictions on coordinated activities in furtherance of the goals in the Consolidated Plan. These partnerships include:

City of Milwaukee Departments: Affordable housing projects; economic development; summer youth employment program; healthcare programs, lead abatement, housing code enforcement, neighborhood improvement initiatives

City of Milwaukee Housing Trust Fund: Affordable housing projects

City of West Allis (local jurisdiction): Continuum of Care

Employ Milwaukee: Milwaukee's area workforce investment board; Employment initiatives; poverty reduction programs; workforce training initiatives

Housing Authority of the City of Milwaukee: Affordable housing; public housing; resident training & employment initiatives

Milwaukee Area Technical College (MATC): Major higher education institution in the City of Milwaukee; serving residents of the CDBG target area; collaborate with CDBG-funded agencies on educational pursuits; employment & training initiatives

Milwaukee County government: Continuum of Care; Regional Analysis to Impediments study; affordable housing projects

State of Wisconsin government: Department of Workforce Development (training and employment); Department of Children & Families (family services, employment); Department of Corrections (workforce training and employment for ex-offenders); Department of Agriculture, Trade and Consumer Protection (consumer issues);

Wisconsin Housing and Economic Development Authority (WHEDA): Affordable housing projects (use of Low Income Housing Tax Credits, National Housing Trust Fund dollars, etc.)

PR-15 Citizen Participation

Summary of the citizen participation process/Efforts made to broaden citizen participation. Summarize citizen participation process and how it impacted goal-setting

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan in 1991. The plan outlines the procedures and processes used by the City to solicit citizen input and has since been updated and revised; the document was subsequently submitted and approved by HUD.

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan, and Annual Funding Allocation Plan (FAP) and review of proposed activities and program performance. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change; and is the basis for the RFP process. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited.

2020-2024 Consolidated Plan and Citizen Participation

The UEDA project team utilized a variety of engagement tools to reach citizens and invite them to participate in the Consolidated Plan process. This included traditional outreach methods such as community meetings, events, survey tools, and small group discussion, but also leveraging newer forms of electronic communication such as organizational databases, social media, the City's E-Notify system, and the creation of a public website specifically for this project.

Citizen input was solicited in the following ways:

- A public website (<u>ConPlanMKE.org</u>) where anyone could see upcoming public meetings and make a request for information;
- Distribution of a community survey (both paper/in-person and electronic)
- Hosting focus groups and community meetings in key Neighborhood Strategic Planning (NSP) areas
- Attendance at various small group and association meetings
- Outreach/engagement at a number of neighborhood events in 2019

The community survey tool was developed so participants could identify and prioritize community needs and share their feedback. Responses were compiled in such a way to assist CDGA in lifting up key needs, and connecting them to strategic plan goals.

Public meetings/focus groups were held at times and locations convenient to citizens and other stakeholders (i.e. in the evenings, during the day, at locations that are accessible for people with disabilities). They were promoted electronically via CDGA and UEDA networks, on social media, by tabling at community/neighborhood events, flyering in partner neighborhoods, etc. Four of the meetings were held in neighborhoods with a majority of African American and/or Hispanic persons, in partnership with NSP organizations.

The website, community survey, and promotion was all offered in English, Spanish and Hmong. Samples of the survey, community survey results, focus group summary, etc. can be found in the Appendix. All promotions included language that the City would accommodate the needs of people with disabilities or non-English speaking persons.

Finally, many funded agencies have attained status as a Community-Based Development Organization (CBDO). The CBDO designation mandates that Boards of Directors of these organizations consist of not only citizens of the target area, but area business owners and other stakeholders, such as schools and churches. That directive broadens community input and aligns with CDGA's philosophy of increasing resident participation in developing neighborhood-based strategies.

Access to Information for Limited & Non-English Speaking Persons

To ensure access to information for all residents, current CDGA staff includes two bilingual persons (English-Spanish) who make themselves available in-house or at public hearings where some large segments of the population speak only Spanish. Southside Organizing Center, one of the NSP agencies, offers translation services for public meetings. With our large Asian-American population, CDGA has access to Hmong-Laotian interpreters through its linkage with the Hmong American Friendship Association (HAFA). The Consolidated Plan website and community survey was translated into both Spanish and Hmong.

Public Notification on the 2020-2024 Consolidated Plan

In accordance with the regulations of the U.S. Department of Housing and Urban Development, the City of Milwaukee prepared a "draft" of the 2020-2024 HUD Consolidated Plan will be posted for public comment at the City of Milwaukee website (www.city.milwaukee.gov/CDGA) and project website (conPlanMKE.org) from December 18, 2020 through January 17, 2021.

The notice and the draft plan will also be made available to the public via the City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report. Additionally, CDGA notified all funded community agencies, NRSA NSP coordinating agencies, elected officials and other interested persons through e-mail and E-Notify (a local government citizen electronic notification system).

Because in-person / public meetings are not possible at this time due to the high rate of COVID-19 infections, notification will be distributed largely through electronic tools (e-mail via UEDA and E-Notify, Task Force members, social media). The public can provide feedback to a specific email address (comment@conplanmke.org), in writing or by phone to the CDGA office. UEDA will host an informational webinar in early January 2021 that is open to the public; it will be recorded and posted for future viewing at the project website (ConPlanMKE.org).

The Community and Economic Development (CED) Committee is the official oversight body for Federal grant funds. Members of the CED Committee have been provided regular updates about the Consolidated Plan process both at CED committee meetings (currently virtual) and via communication from CDGA and UEDA. Public meetings (virtual or in-person) were scheduled at times convenient to citizens, potential and actual beneficiaries, community-based agencies and other interested parties, with accommodations provided for persons with disabilities.

CDGA advertised public meetings through newspapers, mailings, telephone calls, City website, and word-of-mouth. The Common Council City Clerk's Office advertises and posts public notices for public meetings. The City includes in all notices that it will accommodate the needs of people with disabilities through sign language interpreters or other auxiliary aids.

Citizen Complaints

CDGA has an internal system for responding to citizen complaints and concerns in a timely manner (generally, within 15 working days where practicable). Program Officers are available to meet with clients that present themselves at the CDGA offices. A written report is formulated when the issues are of a substantive nature and resolution is not achieved during the initial meeting. Staff will follow-up on substantive issues and provide written responses to the complainant and if necessary, provide copies of these responses to the affected organizations. Staff will track the ensuing process and analyze feedback from the parties concerned to determine viable resolution.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of re sponse/ attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
Broad-Based City-Wide Community events and meetings	Flyers, e-mail, tabling, social media, newspapers, website, surveys	Community residents, businesses, associations, & other stakeholders	Participated in 21 community events and/or meetings; connecting with 725+ residents	See Appendix for activity summary.	N/A. All comments on the Plan are accepted and considered	
NSP Community meetings	Flyers, e-mail, social media, surveys, website, small group discussion	Community residents, businesses & other stakeholders	Four NSP meetings held; 99+ attendees	See Appendix for activity summary.	N/A. All comments on the Plan are accepted and considered	
Focus Groups (Housing, Youth, Small Business)	Flyers, e-mail, social media, surveys, website, small group discussion	Community residents, businesses & other stakeholders	Four Focus Groups held; 59+ attendees	See Appendix for activity summary.	N/A. All comments on the Plan are accepted and considered	
Task Force	E-mail, surveys, in-person meetings	Housing, social service, workforce, youth, special needs, small business providers, philanthropy, government	35+ participants (see roster on pg. 19-20)	Feedback incorporated into Plan.	N/A. All comments on the Plan are accepted and considered	
Continuum of Care	Specific provider survey; meetings, e-mail	Homeless and Special Needs service providers	Survey tool completed; CoC meeting	Feedback incorporated into Plan.	N/A. All comments on the Plan are accepted and considered	
HOPWA and Veterans Service Providers	Specific provider survey; meetings, e-mail	Special Needs service providers	Survey tool completed; e-mail follow-up	Feedback incorporated into Plan.	N/A. All comments on the Plan are accepted and considered	
Consolidated Plan Project Website	Website, e-mail, social media	Community residents, businesses, associations, & other stakeholders	Hosted survey tool, ConPlan information, calendar of outreach events		N/A. All comments on the Plan are accepted and considered	ConPlanMK E.org

Table 4 - Citizen Participation Outreach

From July 2019 - January 2020 the UEDA project team facilitated and/or participated in nearly 30 events, focus groups or meetings, receiving input from and/or engaging 850+ residents. We also met with Task Force members throughout the year (both as a group or individually) to receive additional, specific feedback related to various sections of the Consolidated Plan.

The community survey was open from July - November 2019 and received nearly 1,200 responses (in English, Spanish, Hmong). Outreach covered the CDBG Target Area well; the top 10 zip codes for responses were:

53212, 53208, 53215, 53207, 53206, 53204, 53218, 53202, 53029, and 53211. Youth also had a significant voice in the community survey; and survey demographics aligned with the City's from the most recent 5-Year American Community Survey average.

The following top priorities were identified through survey, with respondents asked to prioritize services areas within each category:

- Public Services: Youth Services (38%)
- Economic Opportunity & Employment: Job Training & Placement (49%)
- Public Facilities/Infrastructure: Street Improvements (53%)
- Housing Options & Services: Safe Housing (39%) and Affordable Housing (26%)
- Special Needs Services/Housing: Homeless Assistance/Eviction Prevention (39%) & Fair Housing Enforcement (34%)

In terms of need, these Youth Services, Housing and Jobs rose to the top throughout the survey. Within each of these categories, the following issues/themes continued:

- Youth Activities
- Employment Services
- Street Improvements
- Affordable & Safe Housing
- Homeless Assistance / Eviction Prevention

In the survey comments, the following themes emerged:

- Transit and transportation issues are one of the most frequently named in the "Public Services" section, whether in the context of youth access to activities, or access to jobs
- Housing, especially affordability (more units) and offering new "non-traditional" options in affordable housing
- Youth services and activities, especially employment opportunities for youth
- Small business support services
- Facilities and Infrastructure: Street conditions and the need for repairs; Lead poisoning and water laterals
- Safety comes up often as a theme

Survey results were compiled in a summary report that is included in the Appendix and available at ConPlanMKE.org.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Over a 12-month period, the 2020-2024 City of Milwaukee HUD Consolidated Plan process utilized a comprehensive set of community outreach and input activities, analysis of housing and economic data, and review of other community plans to identify and summarize the following community needs.

Background/Context

The City of Milwaukee's current population is estimated to be 599,100. The median age in the City of Milwaukee is 31.3 years, which is lower than the larger metropolitan area (37.6 years). While the median age of the metro area is increasing, the City's median age is increasing at a slower rate.

The City of Milwaukee has about 230,500 households, of which 44% are White (Non-Hispanic), 38% are Black, 13% are Hispanic, and 3% are Asian. Native American and multi-racial households are slightly less than 1%. The metro Milwaukee area is considered very hyper-segregated, with 90% of metro area Black households and 67% of Hispanic households residing within the City of Milwaukee.

As America's demography is changing, so too is the City of Milwaukee. While the City's total population has been relatively stable since 2000, the dynamics of who lives in the City has changed. The percentage of the City's population that identifies as non-White has grown, both through a decline in the White non-Hispanic population via out-migration ("white flight"), and a significant growth in the Latino/Hispanic population.

For example, between 2000 and 2017 the Latino/Hispanic population grew by about 54% (38,000 people). The Black population has remained relatively unchanged, with a less than 1% increase. Also, while the City as a whole is among the most diverse in the nation by some measures, there are many neighborhoods that are highly segregated where more than 90% of residents are persons of color.

The 2017 median household income in the City of Milwaukee is \$38,300, which is significantly lower than surrounding communities:

Key Comparative 2017 Income Indicators

	City of Milwaukee	Milwaukee County	Metro Milwaukee
Median Household Income (in 2017 dollars)	\$38,289	\$46,784	\$57,531
Median Per Capita Income (in 2017 dollars)	\$22,918	\$27,046	\$30,973
Percent Below Poverty Level	24.0%	18.3%	13.1%
Percent with Bachelor's Degree or Higher (B`5002)	23.8%	30.1%	34.5%
Unemployment Rate (Population 16 years and over)	9.0%	7.1%	5.5%

Data Source: City of Milwaukee Department of City Development. 2017 5 Year American Community Survey

However, about 77,700 or 34% of City households earn less than \$25,000 in 2017. These households tend to spend a considerable portion of their annual incomes on housing, and generally have difficulty finding safe and decent housing in the private market. When people have to pay more for housing, this leaves few resources to meet other basic needs such as food, health care, transportation, etc.

There are also significant disparities when looking at economic indicators by race. For example, in 2015 the median wage for non-white workers was \$5 less than the median wage for white workers in the City of Milwaukee, and only 51% of non-white workers earned at least \$15/hour, while 73% of white workers did. [Source: National Equity Atlas]

Another challenge is that the percent of persons living in poverty in the City of Milwaukee is around 26% (or about 143,700 people) - much higher than the national average of 14%. Additionally, it is estimated that 41% of children ages 0-17 are living in households with income below the Federal Poverty Level (FPL). [Source: Milwaukee Health Compass]

With poverty and unemployment rates significantly higher in the City of Milwaukee than in the metro area, there is strong demand (and need) for affordable housing units. Other key factors that influence and impact poverty include access to quality (safe) housing, jobs with living wages, health care, and social services.

With this economic and demographic context in mind, the City of Milwaukee assessed community-level needs in the following ways:

<u>Housing:</u> There continues to be a great need for affordable housing units, particularly for those that are paying more than 30-50% of their income towards housing. Cost burden also disproportionately affects communities of color and people with disabilities in the City. Other problems include a significant number of older housing units, lack of resources for housing maintenance and repairs, decreasing owner occupancy, risk of resident displacement due to gentrification, dislocation of residents due to eviction, lead-based hazards, loss of affordable rental units, appraisal valuations, and potential opposition to affordable housing development. Additionally, in recent years there has been an increasing understanding of the direct links between safe, quality housing and people's physical health.

<u>Public Services:</u> The community input process provided additional insight into the need for the following public services in the City of Milwaukee: youth programs (especially job training/work experiences), employment services, street and transportation improvements, affordable and safe housing, services for homeless persons and those with mental, physical and/or developmental disabilities, eviction prevention, crime prevention/neighborhood safety, neighborhood improvement initiatives, community organizing, small business support, support for addressing environmental issues such as lead-based hazards and public health issues such as Covid-19, and access to healthy food. Youth services cut across all categories, which is not surprising given that nearly 30% of the City's population (or 177,694 people) is 19 and under.

Economic Opportunity: These needs include expansion of employment, placement and job training services, financial wellness education, support of Milwaukee's commercial corridors and economic development, support of workforce mobility and poverty reduction programs, technical and financial assistance to businesses for job creation, programs that foster entrepreneurship and small business growth, particularly for young people, and homeownership or other wealth-building opportunities. A critical need will be to

support small, neighborhood-based businesses that have been negatively affected by the COVID-19 pandemic while helping them build toward long-term resilience.

<u>Homelessness:</u> These needs include better quality and more affordable housing particularly for extremely low-income households; financial/rent assistance or income supports, targeted partnership programs for employment and medical care; and financial support to provide supportive services such as case management, protective payee services, AODA programs, and mental health care.

Public Improvements: Needs identified in the City of Milwaukee include street, sidewalk and alley improvements (i.e. resurfacing or reconstructing existing pavement, curb and gutter, or new streets as part of residential, commercial, and industrial development). Residents are also interested in programs/services that emphasize energy conservation, address lead-based hazards, and improve transportation or mobility citywide (public transit, bicycle and pedestrian access).

<u>Public Facilities:</u> These needs include brownfield remediation, environmentally sustainable development, improvements to parks and other public spaces, recreation facilities for youth and families, and expanded senior facilities. New considerations as a result of the public health pandemic (COVID-19) include upgrades to HVAC and other systems to allow for safe, social distancing practices and the purchase of Personal Protective Equipment (PPE) and cleaning/disinfection supplies.

<u>Public Housing:</u> The Housing Authority City of Milwaukee (HACM), members of the Continuum of Care, and task force representatives identified the need for additional Section 8 Housing Vouchers and Rent Assistance certificates. HACM last opened its rent assistance voucher waiting list in 2015 and took in over 35,000 applications in ten days. When the public housing family waitlist was last opened in 2017, over 8,400 households applied in two months. Additionally, with a shortage of accessible homes/apartments in the market, there is a need for accessible units for residents with mobility issues. Residents in public housing also need supportive services to live independently (seniors, people with disabilities), to improve economic self-sufficiency, and access to transportation.

<u>Special Needs Populations:</u> These needs include permanent housing and supportive services for persons with mental, physical and/or developmental disabilities, HIV/Aids; services for the elderly and people with disabilities such as homecare, transportation, employment, and home repair/maintenance. New groups that have emerged in public input for specialized services are youth aging out of foster care, victims of trafficking or domestic violence, LGBTQ individuals (and youth), and formerly incarcerated individuals.

Needs Associated with the Impact of COVID-19 Factors: During the completion of the Consolidated Plan, all phases of life were thrown into disarray by the COVID-19 pandemic. Public, nonprofit and private entities are working together to increase the capaCity of agencies and programs on the front line of the pandemic, and complement the ongoing work of public health experts. The need for investments in facilities, PPE, cleaning supplies and increased maintenance of public facilities to support safe public health practices will have renewed focus. Long-term economic and social disruptions are expected to cause extreme hardships for a broad swath of City of Milwaukee residents, exacerbate many of the needs discussed above, and require sustained investment in strategies that support long-term recovery.

<u>Administration of the City's HUD Entitlement Program:</u> These needs include day-to-day oversight and administration of all HUD-funded programs to ensure compliance with Federal regulations, timeliness of expenditures, monitoring all funded activities and technical assistance to subrecipients.

Summary

The community survey also asked respondents "What is great about our City of Milwaukee" and "What needs to change about our City of Milwaukee." The most frequent responses to what is great were Milwaukee's diversity, green spaces, neighborhoods and people. Conversely, responses to what needs to change included segregation, better housing, jobs and safety. Overall there is a sense that Milwaukee's diversity of people and neighborhoods (and as evidenced in the demographic data) is a strength, but the impact of continued segregation patterns remains a challenge.

Milwaukee's continued standing as one of the most segregated cities and metro areas in the country is a result of a long history of structural and institutional racism. The legacy of past "redlining" practices continues to manifest in deep racial and economic inequalities in the region, including a persistent and startling racial wealth gap. Working to reverse the impact of these historical disparities requires a consistent focus on growing incomes and employment rates of existing city residents.

PRIMARY SOURCES:

- 1. City of Milwaukee HUD Consolidated Plan Community Survey, Focus Groups, Task Force and City Department input
- 2. 2019 City of Milwaukee Housing Affordability Report Department of City Development, Planning Division (December 2019)
- 3. Home is Where our Health Is: Policies to Improve the Health of Renters in Milwaukee and Beyond Human Impact Partners and Community Advocates Public Policy Institute (February 2020)
- 4. 2019 Community Needs Assessment Social Development Commission
- 5. A Place in the Neighborhood: An Anti-Displacement Plan for Neighborhoods Surrounding Downtown Milwaukee City of Milwaukee, Department of City Development (February 2018)
- 6. PolicyLink/PERE, National Equity Atlas, www.nationaleguityatlas.org

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Below is data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	594,833	599,500	1%
Households	230,026	230,805	0%
Median Income	\$37,089.00	\$35,958.00	-3%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	58,705	40,610	44,935	21,630	64,930
Small Family Households	21,020	15,180	16,305	8,245	30,115
Large Family Households	5,585	4,335	4,450	1,965	4,090
Household contains at least one					
person 62-74 years of age	7,310	6,150	7,560	3,575	10,535
Household contains at least one					
person age 75 or older	4,315	5,010	4,430	1,615	3,485
Households with one or more					
children 6 years old or younger	13,940	8,780	8,095	2,930	4,840

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

Below is data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

1. Housing Problems

(Households with one of the listed needs)

	Renter						Owner			
	0-30%	>30-	>50-	>80-	Total	0-30	>30-	>50-	>80-	Total
	AMI	50% AMI	80% AMI	100% AMI		% AMI	50% AMI	80% AMI	100% AMI	
NUMBER OF HOUSEHOLI	DS							•		
Substandard Housing -										
Lacking complete										
plumbing or kitchen										
facilities	1,100	520	275	65	1,960	90	80	40	35	245
Severely Overcrowded										
- With >1.51 people per										
room (and complete										
kitchen and plumbing)	640	290	235	40	1,205	75	40	175	65	355
Overcrowded - With										
1.01-1.5 people per										
room (and none of the										
above problems)	1,955	1,165	775	180	4,075	205	415	630	205	1,455
Housing cost burden										
greater than 50% of										
income (and none of										
the above problems)	31,450	5,395	650	70	37,565	5,755	4,065	2,085	290	12,195
Housing cost burden										
greater than 30% of										
income (and none of										
the above problems)	6,140	14,895	5,965	640	27,640	1,415	4,180	6,665	2,760	15,020
Zero/negative Income										
(and none of the above										
problems)	3,890	0	0	0	3,890	990	0	0	0	990

Table 7 - Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2

(Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

			Renter					Owner		
	0-30%	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		AMI	50%	80%	100%	
		AMI	AMI	AMI			AMI	AMI	AMI	
NUMBER OF HO	USEHOLD	S								
Having 1 or										
more of four										
housing										
problems	35,145	7,365	1,935	350	44,795	6,125	4,600	2,925	595	14,245
Having none										
of four										
housing										
problems	10,500	20,715	23,460	9,320	63,995	2,050	7,925	16,610	11,365	37,950
Household										
has negative										
income, but										
none of the										
other housing										
problems	3,890	0	0	0	3,890	990	0	0	0	990

Table 8 - Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30%	>30-50%	>50-80%	Total	0-30%	>30-50	>50-80	Total
	AMI	AMI	AMI		AMI	% AMI	% AMI	
NUMBER OF HOUSEH	IOLDS							
Small Related	16,430	8,680	2,130	27,240	1,785	2,835	3,485	8,105
Large Related	4,400	1,870	349	6,619	740	970	870	2,580
Elderly	4,985	3,105	1,115	9,205	3,225	3,365	2,355	8,945
Other	15,115	7,765	3,255	26,135	1,720	1,415	2,210	5,345
Total need by	40,930	21,420	6,849	69,199	7,470	8,585	8,920	24,975
income								

Table 9 - Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30%	>30-50	>50-80	Total	0-30%	>30-50	>50-80	Total
	AMI	% AMI	% AMI		AMI	% AMI	% AMI	
NUMBER OF HOUSE	HOLDS							
Small Related	14,115	1,670	100	15,885	1,515	1,625	890	4,030
Large Related	3,485	350	4	3,839	630	355	40	1,025
Elderly	3,510	1,100	280	4,890	2,405	1,275	540	4,220
Other	12,675	2,485	325	15,485	1,455	945	615	3,015
Total need by	33,785	5,605	709	40,099	6,005	4,200	2,085	12,290
income								

Table 10 - Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter							Owner		
	0-30	>30-50	>50-80	>80-	Total	0-30%	>30-5	>50-80	>80-	Total
	%	% AMI	% AMI	100%		AMI	0%	% AMI	100%	
	AMI			AMI			AMI		AMI	
NUMBER OF HOUS	EHOLDS									
Single family										
households	2,255	1,150	725	84	4,214	215	350	655	220	1,440
Multiple,										
unrelated family										
households	280	280	265	105	930	75	105	160	54	394
Other,										
non-family										
households	99	80	25	45	249	0	0	0	0	0
Total need by	2,634	1,510	1,015	234	5,393	290	455	815	274	1,834
income										

Table 11 - Crowding Information - 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30%	>30-50	>50-80%	Total	0-30%	>30-5	>50-80	Total
	AMI	% AMI	AMI		AMI	0%	% AMI	
						AMI		
Households with								
Children Present	15,207	9,710	6,861	40,123	2,032	2,797	4,924	23,902

Table 12 - Crowding Information - 2/2

Data Source: City of Milwaukee Department of City Development. The 2018 PUMS 5 Year data was used to calculate/estimate the percentages of Households that had children (18 and under), by tenure (TEN), and sorted using the AMI thresholds to get the percentages within each group, and applied it to the 2018 5 Year estimates on numbers of renter and owner occupied households.

Describe the number and type of single person households in need of housing assistance.

According to feedback from Continuum of Care service providers, single men make up a significant number of those experiencing homeless in Milwaukee, and is disproportionate to men of color. About 23% of women seeking shelter as a result of domestic violence are single. Single person households often struggle with mental health and AODA issues. These issues are discussed in greater detail in sections NA-40 and NA-45.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In 2018 there were just over 490 people sheltered as a result of domestic violence or fleeing from abuse. Although they need a variety of supportive services and assistance with criminal justice, one of the biggest gaps or needs for this group is financial and/or rent assistance.

According to the National Disability Institute (NDI), 12.6% of the City of Milwaukee's population has a disability. Among those working, 63% of workers with disabilities are earning less than \$25,000, and 37% of households with a person with a disability pay more than 50% of their income for housing. People with disabilities experience a higher rate of severe housing cost burden and there is a shortage of accessible units both in the private market and in public housing.

The housing and service needs for these individuals are discussed further in sections NA-40 and NA-45.

What are the most common housing problems?

The most common housing problems in the City of Milwaukee can be described in terms of affordability and quality. In particular there is a need for affordable housing units for people with very or extremely low-income (50% or below AMI). The opportunity to earn a livable wage has a major influence on housing affordability in the City of Milwaukee. Wisconsin is one of 21 states that has a minimum wage equal to the Federal minimum. State legislation prohibits setting minimum wages above this, despite ample evidence that higher minimum wages lead to lower poverty rates for families with low incomes. There is also a need for quality affordable modest single-family homes for first-time homebuyers.

Over 42% of the housing in the City was built before 1940, and is located in the central city. Much of this housing stock is in need of repair, particularly in neighborhoods with high percentages of low-income households and absentee landlords. Substandard housing can have a detrimental impact on people's health. Costs to maintain and update older properties are often prohibitive, and deferred maintenance by property owners due to negligence or due to an inability to secure funding is a major problem. Residents in aging homes often pay more for energy costs and to address the impacts of lead-based hazards.

The loss of tenant protections in recent years has led to a decrease in housing stability for many residents at risk of eviction, either because of affordability or poor conditions.

Nearly 68% of respondents to the Consolidated Plan community survey stated that housing discrimination was common in Milwaukee County. There is still often community opposition to affordable housing developments both in city neighborhoods, but also in other jurisdictions in the region. While this is not new or even surprising, in 2019, the City of Milwaukee participated in a collaborative "Regional Analysis of Impediment to Fair Housing" that included the counties of Milwaukee, Jefferson, Ozaukee, Washington, and Waukesha, plus the municipalities of Wauwatosa and West Allis. The resulting analysis was completed in 2020, and took a deeper look at some of the longstanding systemic problems that plague the region. These impediments range from and are not limited to:

- Lack of regional strategy and housing plan.
- Lack of regionally dispersed affordable housing.
- Restrictive land use regulations and zoning ordinances.
- Prevalent "NIMBYism" or fear of others in some communities.
- Lack of fair housing guidance and enforcement.
- Lack of accessible housing for persons with disabilities.
- Racial disparities in homeownership.
- Extensive use of evictions.

The assessment also found that Milwaukee, being the largest City of the collaborative, has some distinguishing characteristics that deserve special attention (although these are also shared by the older suburban cities). These include gentrification in some neighborhoods surrounding the downtown area, a lack of private investment in specific neighborhoods, racial and ethnic disparities in mortgage lending, insurance and appraisal practices, and lack of awareness of fair housing laws. Each of these not only presents unique challenges, but are also connected to the most common housing problems in Milwaukee.

Are any populations/household types more affected than others by these problems?

Households that are very or extremely low-income (50% or below AMI) experience housing problems such as overcrowding, substandard conditions or severe cost burden at disproportionate rates. In 2017, about 34% of City households earned less than \$25,000. These households tend to spend a considerable portion of their annual incomes on housing, and generally have difficulty finding safe and decent housing in the private market.

Other groups that are more affected include the elderly, who need financial assistance and improved conditions to age in place; households with children or larger families; non-white households; people living with a disability; those recovering from substance abuse; people with mental health considerations; those aging out of foster care; formerly incarcerated individuals; and immigrant or refugee populations.

Local data consultants Data You Can Use (DYCU) provided additional analysis that examined trends for the most severe housing problems and changes in the characteristics and needs of households who are at risk (see DYCU Trends Analysis tables for detail). They found that:

- The number of households who have extremely low incomes (0-30% AMI) has increased over time.
- There has been a significant increase over time in elderly households that pay more than 50% of their incomes towards rent.
- The number of households living in overcrowded units, including single-family households, has also increased over time, particularly for those 0-50% AMI.
- Renters in low and extremely low-income households continue to experience one or more severe
 housing problems at higher rates than those in other income groups, including severe cost burden
 and living in overcrowded conditions.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

Characteristics that lead to instability include low wages, insecure employment, and/or poverty (higher cost burden), poor condition of the unit, the threat of domestic violence, or someone in the household that is experiencing substance abuse, mental health issues, physical and/or developmental disabilities. When people are unable to pay their rent because of the high cost of housing, they are at greater risk for eviction or involuntary moves and thus homelessness. Many people experience one or more of these issues, and exist in a traumatic and unstable environment.

Additionally, homeowners experiencing financial difficulties are at greater risk of losing their homes to foreclosure, or struggle to maintain the property. Low-income elderly homeowners in particular often live on a fixed income, are unable to make needed repairs, and/or are at risk for displacement when property taxes rise.

Continuum of Care service providers unilaterally agreed that case management and financial assistance are critical needs for formerly homeless families. Continuing to provide supportive services and/or financial subsidies for those in nearing the end of rapid re-housing assistance is needed.

With the economic impact of COVID-19 becoming more and more apparent, we anticipate that more households are at risk of becoming homeless due to a significant loss of income and lack of resource for increased rent assistance.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City of Milwaukee follows the ESG regulation on the definition of "at-risk population":

An individual or family only has to meet one of the 7 (A-G) and meets the requirements laid out in (i), (ii), (iii). § 576.2 Definitions.

At risk of homelessness means: (1) An individual or family who:

- 1. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- 2. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
- 3. Meets one of the following conditions:
 - a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b. Is living in the home of another because of economic hardship;
 - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- 4. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

5. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Housing characteristics that lead to instability are the high cost of renting (exceeds the tenant's financial means); a financial emergency or major expense; unsafe housing conditions including condemnation; age; sexual orientation and identity; race/Ethnicity; lack of support for families that are experiencing a mental health crisis or have members with special needs; the threat of domestic violence; barriers to approval and higher costs for housing for A lack of affordable housing, poor conditions, low-incomes, mental health or substance abuse issues, eviction history and criminal records (which are easily searched in Wisconsin), and non-standard rental agreements are people with eviction or criminal history; and a limited supply of Housing Choice vouchers and other subsidized housing.

matters that were raised several times in focus groups as factors that decreased housing stability. Continuum of Care service providers also indicated that a lack of access to supportive services and/or financial assistance after six months increases a person's likelihood of experiencing housing instability quickly, and potentially becoming homeless.

Discussion

The remaining sections of the Needs Assessment go into further detail on disproportionate need for housing by income, race/Ethnicity, housing problems and the housing/service needs for specific groups of people.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The following charts contain data provided by HUD that shows how housing problems affect people in the City of Milwaukee by income level and race or Ethnicity. The data is provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	48,825	5,005	4,880
White	12,790	1,370	1,615
Black / African American	26,185	2,820	2,420
Asian	1,230	34	195
American Indian, Alaska Native	330	30	35
Pacific Islander	14	0	0
Hispanic	7,125	645	575

Table 13 - Disproportionately Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	31,045	9,565	0
White	10,525	3,475	0
Black / African American	13,630	3,735	0
Asian	905	300	0
American Indian, Alaska Native	190	30	0
Pacific Islander	4	0	0
Hispanic	5,235	1,880	0

Table 14 - Disproportionately Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,490	27,440	0
White	7,245	11,555	0
Black / African American	6,595	10,575	0
Asian	635	480	0
American Indian, Alaska Native	49	145	0
Pacific Islander	4	4	0
Hispanic	2,595	4,160	0

Table 15 - Disproportionately Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,345	17,290	0
White	2,405	9,190	0
Black / African American	1,290	5,065	0
Asian	140	405	0
American Indian, Alaska Native	15	95	0
Pacific Islander	25	0	0
Hispanic	435	2,275	0

Table 16 - Disproportionately Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

Discussion

Along with the data provided by HUD, we also asked local data consultants Data You Can Use (DYCU) to further examine and analyze trends related to housing problems by income and race. They found that since the last Consolidated Plan, more households are experiencing 1 or more housing problems, with higher percentages at the lower income levels (0-50% AMI). As income increases, the need becomes more evenly spread across racial demographics; however, non-white households continue to be more disproportionately affected than the jurisdiction as a whole. For example:

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

- Since 2010, 13% more extremely low-income households experienced one or more housing problems. Households that are 30% AMI continue to experience more housing problems than other income brackets, and are the least able to afford it.
- Since 2010 Hispanic households at 30% AMI experienced a 46% increase in 1 or more housing problems, for Asian households it was an increase of 40%, and for Blacks it was an increase of 13%.
- For very low-income households (30-50% AMI), the trends continue at similar rates with 7% more of all households experiencing 1 or more housing problems; 46% more Asian households; 13% more Hispanic households; and 10% more black Households.
- At the 50-80% AMI level, since 2010 fewer total households experienced 1 or more housing problems (10% decrease), as well as fewer Black households (6% decrease). However, more Asian households (9% increase) and Hispanic households (2% increase) are disproportionately affected.

For detail view the DYCU Trends Analysis tables in the Appendix.

Non-White Households

While the City of Milwaukee has a very racially and ethnically diverse population, there are many neighborhoods which are highly segregated (particularly on the City's north side), and where more than 90% of residents are persons of color (see MKE Indicators Population - Racial and Ethnic Make-up: https://www.datayoucanuse.org/mke-indicators/). These neighborhoods are also often the very same neighborhoods that have higher rates of extremely- to very-low income households and/or persons living in poverty.

Within the City of Milwaukee, 220,362 persons are Black/African-American with 74,220 or 33.7% below the poverty level. According to the U.S. Census, Black householders paid out a higher proportion of family income for rental costs than did other renters, and make up 42% of those spending 30% to 50% of their income on housing and 51% of those spending over 50% of their income for housing. African-Americans are bearing a disproportionately greater cost burden for housing than other populations in Milwaukee.

Poverty Status - Milwaukee, Wisconsin

Race	l lotal Population	Number Below Poverty Level	Percent Below Poverty Level
Black / African American	220,362	74,220	33.7%
White	245,405	38,447	15.7%
Hispanic or Latino Origin	118,488	30,044	25.4%
American Indian & Alaskan Native	n/a	n/a	n/a
Asian	24,944	8,124	32.6%
Native Hawaiian & Other Pacific Islanders	n/a	n/a	n/a

Data Source: 2018 American Community Survey

Since 2010, all non-white households earning 0-50% AMI experienced an increase in 1 or more housing problems. However, African-Americans generally had more problems with the physical condition of their homes than other households in the Milwaukee area, and had such problems with upkeep, public hallways, plumbing, heating, electrical systems and kitchens.

Looking back at Table 6 of the Housing Needs Assessment (NA-10) it is useful to consider that close to 43% of all households in the City of Milwaukee have an income that is 0-50% of the AMI (either very or extremely low-income). Along with the data above, it is clear that non-white households in the City not only experience a higher cost burden, but also disproportionately experience one or more housing problems.

Other Factors Demonstrating Disproportionate Need

Based on review/analysis of City of Milwaukee housing data, reports, and community input, the following additional factors emerged that demonstrate disproportionate need when assessing housing problems for City of Milwaukee residents.

(1) Low Income Households

The Federal government's standard for affordable housing is that no more 30% of household income should be spent on housing related costs. According to HUD, "families who pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording basic necessities such as food, clothing, transportation and medical care." During the past few years, costs for these basic needs have risen dramatically.

Current Homeowners

With an annual median household income for owners in the City of Milwaukee at \$38,000, 43% of owner-occupied households earn less than 80% AMI. For example, approximately 10% of owner-occupied households (9,935) in Milwaukee had incomes at 30% or less of the Area Median Income (AM); and 13% (12,315 households) had incomes from 30-50% AMI. An additional 20% of owner-occupied households (19,350) have incomes between 50-80% AMI.

Between 2006 - 2016 the number of owner-occupied households with incomes less than 80% AMI dropped slightly from 42,400 (CHAS 2006-2010) to 41,600 (CHAS 2012-2016); however the number of owner-occupied households with incomes less than 50% AMI actually increased by 7% over that same time period.

Some of the City's oldest housing stock is located in census tracts with the highest concentrations of low-income households, with much of this stock in need of repair. Along with the Neighborhood Improvement Program (NIP), Targeted Investment Neighborhoods (TIN) and Neighborhood Improvement District (NID) funds, many City of Milwaukee neighborhood organizations also offer grants and partner with financial institutions to offer low-cost loans for essential home repairs. However the demand for this assistance exceeds what's available every year.

Current Renters

Also, as of 2018 the American Community Survey (ACS) estimated there were 134,432 renter-occupied units in the City of Milwaukee with an average household size of 2.39 per renter-occupied unit. From 2006-2016, there was a 16% increase of Milwaukee-area renter households with incomes at 50% AMI or less (approximately 78,870 households, CHAS). Within this, there was a 22% increase in households with incomes at 0-30% AMI (51,415) and a 1% increase in renter households with incomes between 50-80% AMI.

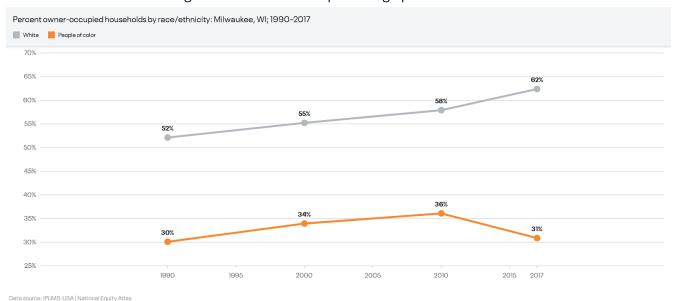
According to the 2019 City of Milwaukee Housing Affordability Report, estimates of median rents vary by number of bedrooms within units: 1 bedroom units were about \$670 per month, 2 bedrooms were about \$826 per month and 3 bedrooms were about \$979 per month. An analysis of 2017 supply data showed that only 12.5% of the housing supply in the City was estimated to be rented for \$500 or less/month, which would allow very low-income households to avoid housing cost burden. There is a real gap of supply in affordable rental units (about 33,000 units) for households at or below \$35,000, but especially those at less than \$20,000 in annual income.

This was supported in a 2018 report on rental housing in Milwaukee County by the Wisconsin Policy Forum which found that while the median cost of rent is not particularly high, there is a supply gap for affordable units for low-income renters (*The Cost of Living: Milwaukee's County's Rental Housing Trends and Challenges*).

Increasing Homeownership

In the City of Milwaukee there was a significant decline in the number of households that owned their own homes between 2007-2018 (by 12%, or 13,600 households). This was particularly the case in the central city (see MKE Indicators Market Value - Homeownership:

https://www.datayoucanuse.org/wp-content/uploads/dlm uploads/2019/05/Market Value Comparison Homeownership Owner Occupied Occupancy Housing Units-DATA-2012-2018-REVISED-1.pdf). While this trend leveled off in 2017, it mirrors national trends and was largely due to the Great Recession and mortgage foreclosure crisis. Additionally, there are significant racial disparities when it comes to homeomynership in the City, with non-white households owning homes at rate of 30+ percentage points lower than white households.



Source: Policy Link National Equity Atlas (https://nationalequityatlas.org/indicators/Homeownership#/)

A number of researchers in the past few years have looked at racial disparities in homeownership in greater detail (i.e. University of Wisconsin-Milwaukee Center for Economic Development, Milwaukee Health Compass Community Health Needs Assessment, Take Root Milwaukee homeownership initiative). The most recent American Community Survey average (2018) show the following homeownership rates by race/Ethnicity:

	Overall	Black/African-Americ an	Hispanic/Latin o	White
City of Mllwaukee Homeownership Rate	41.8%	27.5%	37.3%	56%

Source: Wisconsin Policy Forum, "Laying the Foundation: An overview of City of Milwaukee affordable housing programs and priorities" (July 2020 - Wisconsin Policy Forum | Laying the Foundation (wispolicyforum.org))

The community input process demonstrated that the desire for supporting homeownership remains a major concern for residents in Milwaukee. Although Milwaukee residents discussed it in a variety of contexts, homeownership was consistently seen as a stabilizing force for families and neighborhoods alike. Key issues related to increasing homeownership include the following:

- Access to down payment assistance and conventional mortgage loans for low-income people must be widened. Many low-income residents in Milwaukee desire homes, are committed to their neighborhoods, but do not earn enough to save for a downpayment or cannot qualify for loans.
- Large families would benefit greatly from homeownership as overcrowding, high rents and lower numbers of units that can accommodate large families continue to put pressure on this group.
- Neighborhood safety is still an important issue for many in Milwaukee's central city. Declining
 homeownership, deteriorating and foreclosed properties, closed businesses, drugs and violence all
 continue to erode the safety and well-being of residents.
- Many low-income people are highly motivated to learn the various aspects of successful homeownership, and would greatly benefit from increased access to technical assistance resources and assistance to buy a home, particularly financial education/counseling and household budgeting practices.
- An increasing number of housing units in Milwaukee are owned by individuals and businesses that do not reside in the City of Milwaukee (or even the state). As more housing stock is owned by investors, opportunities for homeownership decline as supply is reduced and prices are driven up.

The City of Milwaukee's Anti-Displacement Plan (2018) specifically identifies the need to support and grow the capaCity of existing organizations and programs that help low- to moderate-income individuals and families purchase homes. In particular, the plan focuses on assisting renters acquire and occupy homes in neighborhoods immediately surrounding downtown Milwaukee through housing counseling, down-payment and closing cost assistance, purchase/rehab loans, and responsible rent-to-own models.

(2) Unit Safety and Quality

According to the City of Milwaukee's Housing Affordability Report (2019), some of the City's oldest housing stock is located in census tracts with the highest concentrations of households earning under \$25,000 per year and much of this stock is in need of repair. This is particularly the case in neighborhoods with high percentages of low-income households and absentee landlords, with prohibitive costs to maintain and update older properties, and a higher rate of building code violations that require significant improvements. For many low-income people in Milwaukee, obtaining rental housing that meets standards of safety and decency in terms of the HUD-defined criteria for housing problems (i.e. plumbing, electrical systems etc.), is difficult.

In the Consolidated Plan community input survey, 39% of respondents ranked "Safe" as their top need for investment in housing, with "Affordable" right behind it. Focus groups with residents and sector professionals also focused on the declining quality of the City's older housing stock as significant concerns. Some identified this as an opp; or unity to utilize rehabilitation resources (particularly by turning foreclosed homes back into ownership); others also discussed new or non-traditional development strategies that would both improve the quality and affordability of housing in the central city.

(3) Senior Households

In 2017, about 6.5% of the City of Milwaukee's population was over 70 years old, and the City currently has about 39,000 seniors that will either need to age in place or find appropriate housing (2019 City of Milwaukee Housing Affordability Report). Additionally, of the total population living below the federal poverty level in Milwaukee, 15% (9,503) were aged 65 or older. Table 6 of NA-10 also shows that 23% of households with at least one person aged 62 or older have an income of less than 50% AMI (22,735 households, CHAS). The following are the major concerns for older adults in Milwaukee:

- Safe neighborhoods, as many seniors are highly at-risk for certain types of crime including burglary, assault and physical and sexual abuse. They are often afraid to leave their homes and feel trapped resulting in isolation and dependence.
- Senior homeowners and/or people with disabilities are most at risk of losing their homes due to rising taxes and property assessments, while living on a fixed income.
- Maintenance and repair of homes owned by seniors is a major concern as many older adults live on fixed incomes and can no longer maintain their homes and exterior premises. Deterioration results and the safety of owners and neighbors can be compromised.
- Senior duplex owners are losing needed income from unrented units as many do not rent out of fear and their inability to maintain and repair units. They also need assistance in recovering rental income.
- Accessibility of homes owned by seniors as they age, to address difficulty entering and leaving homes, and moving safely and efficiently inside them.
- If seniors lose their housing or need to go into shelter, they are often the hardest group to shelter given health concerns and lack of medical care on-site at shelters.

• Other needs for older adults include legal assistance and estate planning, transportation, housekeeping assistance, nutritional and health care programs, and assisted living programs that help them day-to-day routines (particularly for those that are emotionally unwilling or economically unable to leave their home).

(4) Families

Large numbers of Milwaukee families, especially in the central city, cannot afford decent and reasonably priced housing. Significant proportions of large families in Milwaukee reside in cramped, overcrowded and unsafe rental housing units. Major concerns for family rental housing center on affordability, availability, quality (structurally sound, up to code), size, and location (in all areas of the City).

Of particular concern are the needs of female-headed households with children under the age of 18. Milwaukee has a total of 33,982 of these families, and of them 42.3% are below the federal poverty level (2018 ACS). This population has a great need for larger, more affordable housing units along with a variety of services such as employment and access to better-paying jobs, healthcare, childcare, transportation, and life-skills.

(5) Special Needs Populations

The following groups also experience disproportionately greater need in terms of accessing safe, affordable housing, and often require a variety of supportive services.

Persons with Mental, Physical and/or Developmental Disabilities

Of Milwaukee's total civilian non-institutionalized population of 587,011, approximately 14% (148,907 persons) have a disability which includes vision, hearing, ambulatory, cognitive and/or self-care difficulties, (2018 ACS). The majority of this population receives SSI/SSDI as their major source of income.

According to the National Disability Institute (NDI), 45% of working-age people (18-64) with disabilities live below poverty, compared with 20% of those without disabilities. Among those that are working, 63% of workers with disabilities earn less than \$25,000/year. About 37% of households with a person with a disability pay more than 50% of their income towards housing, experiencing a severe housing cost burden. Also, a majority of census tracts that have 19%+ people with a disability are also concentrated in the central city (p. 2 NDI "Milwaukee From A Disability Perspective") and coincide with areas that have the oldest housing stock.

There is a need for additional affordable permanent housing with supportive services (such as HUD Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities). And for persons living independently, other needs include accessibility modifications, financial assistance, transportation, and assistance with home care and home maintenance.

Housing Needs of Persons with HIV and AIDS

As of December 2018, the Wisconsin Department of Health Services, (DHS), HIV/AIDS Program documented 7,185 persons with HIV infection living in Wisconsin, with nearly half (48%) of those individuals currently residing in Milwaukee County. During 2009-2018, there was an average of 240 new HIV diagnoses per year.

HIV disproportionately affects people of color in Wisconsin; the percentage of new diagnoses affecting people of color rose from 20% in 1982 to 66% in 2018. During 2018, racial and ethnic minorities made up just 18% of Wisconsin's population, but consisted of 66% of new HIV diagnoses.

This health inequity can largely be attributed to social and economic factors (i.e. the social determinants of health), which affect non-white people to a larger extent in Wisconsin, putting people of color at greater risk for acquiring HIV. Additionally, people living with HIV are living longer and healthier lives, requiring that services for people living with HIV often need to address health conditions associated with aging.

Many HIV-positive individuals struggle with housing needs. As the numbers of housing units available for low-income individuals continue to shrink, this increases competition for available housing and offers landlords an upper hand when making choices about to whom they should rent.

(6) People Experiencing Homelessness

According to Milwaukee Continuum of Care service providers, the most consistent factor linked to an increased risk of homelessness is that most rents exceed a tenant's financial means. Other factors cited include race/Ethnicity, insecure employment, children with special needs, and eviction history. There is strong consensus that homelessness disproportionately affects people of color, especially African-Americans.

A lack of affordable housing is a major need of homeless persons, as well as supportive services (particularly case management, mental health and AODA services) to help persons achieve self-sufficiency and maintain permanent housing. While the Housing First model and permanent supportive housing practices have become more prevalent, the availability of financial subsidy and supportive services continues to fall short of the need in Milwaukee.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Below is data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

As the following charts show, non-white households are more affected than the jurisdiction as a whole in terms of experiencing severe housing problems, particularly African-Americans and extremely low-income (0-30% AMI) and very low-income (30-50% AMI) households. No disproportionate need was found in the middle-income category (80-100% AMI).

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	41,270	12,550	4,880
White	10,555	3,600	1,615
Black / African American	22,500	6,510	2,420
Asian	1,070	200	195
American Indian, Alaska Native	265	104	35
Pacific Islander	14	0	0
Hispanic	5,910	1,865	575

Table 17 - Severe Housing Problems 0 - 30% AMI

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,965	28,640	0
White	4,140	9,865	0
Black / African American	4,950	12,415	0
Asian	455	745	0
American Indian, Alaska Native	54	165	0
Pacific Islander	4	0	0
Hispanic	2,100	5,015	0

Table 18 - Severe Housing Problems 30 - 50% AMI

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Data Source: 2011-2015 CHAS

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Data Source: 2011-2015 CHAS

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,860	40,070	0
White	1,810	16,985	0
Black / African American	1,630	15,540	0
Asian	440	675	0
American Indian, Alaska Native	10	180	0
Pacific Islander	4	4	0
Hispanic	880	5,875	0

Table 19 - Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of Four housing problems	Has none of the Four housing problems	Household has No/negative income, but none of the other housing problems
Jurisdiction as a whole	945	20,685	0
White	315	11,275	0
Black / African American	340	6,015	0
Asian	110	430	0
American Indian, Alaska Native	10	100	0
Pacific Islander	25	0	0
Hispanic	140	2,565	0

Table 20 - Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

Discussion

Local data consultants Data You Can Use (DYCU) provided additional trends analysis by income and race for severe (four or more) housing problems. Since the previous Consolidated Plan, more households at lower income levels (0-50% AMI) continue to experience severe housing problems, as compared to the jurisdiction as a whole (an increase of 17%). These are the households that are least able to afford it, and non-white households continue to be more disproportionately affected. For example:

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

- Since 2010 Hispanic households at 30% AMI experienced a 46% increase in 1 or more housing problems, for Asian households it was an increase of 37%, and for Blacks it was an increase of 17%.
- For very low-income households (30-50% AMI), the trends continue with 65% more Asian households and 80% more Native Americans experiencing severe housing problems.
- At the 50-80% AMI level, since 2010 only some non-white households are more affected (Asians, 60% increase), while others are less affected than the juridiction as a whole (Blacks, 7% decrease; Hispanics, 21% decrease; all low-income households, 10% decrease).

For detail view DYCU Trends Analysis tables in the Appendix.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to the City of Milwaukee's 2019 Housing Affordability Report, the number and percentage of City households spending 30% or more of their income on housing in 2017 was 45% (or 104,000 households). Nearly half of those households that experience housing cost burden earn less than \$20,000/year, and about 74% were considered severely cost-burdened (spending 50% or more on housing).

Below is additional data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	124,205	48,535	52,975	5,085
White	67,300	18,910	16,145	1,640
Black / African				
American	36,515	19,985	26,865	2,540
Asian	3,280	1,090	1,350	215
American Indian,				
Alaska Native	515	245	335	35
Pacific Islander	30	0	20	4
Hispanic	14,655	7,450	7,105	595

Table 21 - Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

The Wisconsin Policy Forum 2018 report, "The Cost of Living: Milwaukee County's Rental Housing Trends and Challenges," found that the rent burden affects African-American households at twice the rate of white households in Milwaukee County. This is also demonstrated in the data above, with Blacks making up 41% of households that are paying 30-50% of their income towards housing, and 51% of those that are paying more than 50% of their income.

Data You Can Use (DYCU) also examined housing cost burden trends, finding that since the previous Consolidated Plan, slightly fewer households (-4%) as a whole have housing costs of between 30-50% of their income, but there was an 8% increase in the number of households paying over 50% of their income towards housing. The number of non-white households paying 30-50%, or over 50% of their income for housing has increased. For example:

- Since 2010 more Asian (+43%), Native American (+34%), Hispanic (+28%), and Black (+11%) households are paying more than 50% of their income towards housing, while fewer white households are (-8%).
- For those that are paying 30-50% of their income towards housing, more Hispanic households were affected (+21%), with a slight increase for Black and Asian households (+3%). More white households decreased their housing cost burden in this range over the same time period (-17%).

Interestingly, all non-white household groups also saw increases in the number of peole who reduced their housing cost burden, paying less than 30% of their income towards housing (Hispanic, +20%; Black, +9%; Asian, +7%), while there was a 12% decrease in the number of white households.

For detail view DYCU Trends Analysis tables in the Appendix.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must provide an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

According to the 2011-2015 CHAS data, a total of 48,825 households have one of more of four housing problems, with 26,185 Black/African-Amerincan households at 0-30% of Area Median Income (AMI) experiencing one or more of four housing problems. Blacks have a disproportionate greater need as this represents 54% of the category as a whole. As discussed in previous sections on disproportionate need, this is a trend that is increasing over time. Four housing problems are: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) more than one person per room, 4) cost burden greater than 30% of income.

If they have needs not identified above, what are those needs?

African-American households also experience higher rates of housing cost burden, making up 41% of households that are paying 30-50% of their income towards housing, and 51% of those that are paying more than 50% of their income towards housing.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The majority of those affected with disproportionate greater need with housing problems are African-Americans who primarily reside in central city north side and far northwest side neighborhoods.

In addition, there are large concentrations of affected populations in the City of Milwaukee's two Neighborhood Revitalization Strategy Areas (NRSAs), which are Northside and Southside communities where over 70% of the population falls within the HUD-defined low/moderate income category. CDGA defines areas of minority concentration as those census tracts with a minority population of at least 51%.

Many of these neighborhoods are highly segregated, where more than 90% of residents are persons of color (see MKE Indicators Population - Racial and Ethnic Make-up:

<u>https://www.datayoucanuse.org/mke-indicators/</u>). These neighborhoods also often have higher rates of extremely- to very-low income households and/or persons living in poverty.

NA-35 Public Housing - 91.205(b)

Introduction

Data in the following tables has been provided by the Housing Authority of the City of Milwaukee (HACM) in December 2019.

Totals in Use

	Program Type												
	Certifi	Mod- Rehab	Public										
	cate	Kenab	Housing	Total	Project	Tenant	Special	l Purpose Voucher					
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *				
# of units vouchers in use	0	0	2,631	5,858	1,276	4,208	268	16	90				

Table 22 - Public Housing by Program Type

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition Data Source: PIC (PIH Information Center), verified by HACM

Characteristics of Residents

	Program Type												
	Certifi	Mod-	Public	Vouchers	;								
	cate	Rehab	Housing	Total	Project	Tenant	Special Purp	ose Voucher					
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program					
Average Annual Income	0	0	15,198	14,760	11,936	14,639	15,501	4,586					
Average length of stay	0	0	8	8	1	6	1	0					
Average Household size	0	0	1.7	8	1	2	1	2					
# Homeless at admission	0	0	Not avail	306	0	38	268	0					
# of Elderly/Senior Program Participants (>62)	0	0	819	1,000	441	559	3	4					
# of Disabled Families	0	0	1,312	2,294	814	1,341	130	9					
# of Families requesting accessibility features	0	0	52	Not avail	Not avail	Not avail	42	0					
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0					
# of DV victims	0	0	0	25	0	25	0	0					

Table 24 - Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center), verified by HACM

Race of Residents

	Program Type													
Race	Certific	Mod-	Public	Vouche	rs									
	ate	Rehab	Housing	Total	Project	Tenant	Special	Purpose Voucl	ner					
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disable d *					
White	0	0	392	644	158	363	123	0	0					
Black/African American	0	0	2,007	5,192	1,040	3,904	142	0	0					
Asian	0	0	24	8	4	7	0	0	0					
American Indian/Alaska Native	0	0	6	13	1	12	3	0	0					
Pacific Islander	0	0	0	1	0	1	0	0	0					
Other	0	0	0	0	0	3	0	0	0					

Table 25 - Race of Public Housing Residents by Program Type

Ethnicity of Residents

				Pro	ogram Type	е			
Ethnicity	Certific	Mod-	Public	Voucher	hers				
	ate	Rehab	Housing	Total	Project	Tenant	Specia	l Purpose Vou	cher
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	171	458	73	385	0	0	0
Not Hispanic	0	0	2,277	5,026	1,203	3,823	268	0	0

Table 26 - Ethnicity of Public Housing Residents by Program Type

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition
Data Source: PIC (PIH Information Center), verified by HACM

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition
Data Source: PIC (PIH Information Center), verified by HACM

Section 504 Needs Assessment:

Describe the needs of public housing tenants and applicants on the waiting list for accessible units.

Residents and applicants who have mobility issues and are in need of accessible units face a shortage of homes and/or apartments in both the private market and in public housing that meets their accessibility needs. The Housing Authority of the City of Milwaukee (HACM) does have a data field on the waitlist that can identify a need for a mobility accommodation; however, often that is not documented until a resident is pulled off the waitlist to be processed. On the current public housing waitlists, 52 applicants have identified such a need (30 in senior/disabled housing and 22 for family housing).

Most public housing was built in the 1950s to 1970s and has limited accessibility. Since 1990, as major renovations have occurred at public housing developments, HACM has increased the number of apartments that are accessible and/or adaptable for accessibility. At a minimum, HACM has complied with Uniform Federal Accessibility Standards (UFAS) regulations that require a minimum of 5% of units to be accessible for persons with mobility impairments, and 2% for persons with visual/hearing impairments, though HACM may also exceed the requirements for some developments.

Newer or fully remodeled buildings meant for seniors and persons with disabilities such as Highland Gardens, Cherry Court, Convent Hill, Lapham Park, and Olga Village, are 100% accessible and/or adaptable. For example, some units in these buildings have roll-in showers. In newer family developments such as Townhomes at Carver Park, the minimum number of accessible units have also exceeded the minimum.

Of the public housing sites owned by HACM, 43 units are accessible, 73 are accessible/adaptable, and 132 are visitable (no bedroom on the first floor but it has at least a half bathroom on the first floor and an accessible entrance).

Additionally, former public housing developments that have become project-based voucher housing through the Rental Assistance Demonstration program (RAD) and have been recently revitalized, adding 703 units that are accessible for individuals with mobility impairments. In total, 37 are accessible/adaptable, 6 are visitable, and 8 have accessibility for hearing/visually impaired individuals. Since the last Consolidated Plan, the number of people with disabilities receiving housing assistance vouchers has increased by 34%; for seniors, it has increased by 39%.

Most immediate needs of residents of Public Housing and Housing Choice Voucher holders:

The most immediate needs of residents living in public housing and choice voucher holders are:

- 1. Coordination of supportive services would help more seniors and persons with disabilities continue living independently.
- 2. Assistance with economic self-sufficiency and employment for adults who are able to work. For example, improved access to transportation is a real need there is an imbalance between the location of affordable housing and the location of jobs and employment centers in the Milwaukee metro area.

How do these needs compare to the housing needs of the population at large:

The needs of households in subsidized housing (public housing and Housing Choice Voucher) largely mirror those of the population at large. As section NA-05 of the Needs Assessment discusses, the City of Milwaukee has poverty and unemployment rates that are higher than the metro area. Households with an annual income at or below \$35,000, and particularly those with an annual household income of less than \$20,000, are experiencing a severe cost burden as they are currently paying more than 30% of their income to rent, with many paying more than 50%. Housing cost burden, access to jobs with living wages, affordable health care, and social services are critical needs, both for the population at large and households in subsidized housing.

Discussion

The demand for safe, quality affordable housing remains high. In 2016, 35,000 applications were received alone for the Housing Choice Voucher program; an amount that far exceeds the number of available subsidized housing units. Since the 2014-2019 Consolidated Plan, the total number of vouchers has increased by 5.4% while the number of public housing units has decreased by 25%. This reveals that there is a gap in the supply of affordable rental units for both the population at large and those living in public housing.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction

Milwaukee, like much of the rest of the country, has experienced an increased awareness of homelessness in the City that has been predominantly driven by housing insecurity as a result of the impacts of the COVID-19 pandemic, and the increased visibility of homeless encampments. Those experiencing homelessness usually exhibit more than one of the following characteristics: extremely low income/poverty, large family size, history of eviction, low education, difficulty finding employment that pays a living wage, work only seasonal hours and have difficulty maintaining employment, difficulty finding jobs accessible via public transportation, physical disabilities, physical and/or mental health issues, drug issues, children with special needs, and lack of any support network. Other factors that play a role in homelessness include age, sexual orientation and identity, race/Ethnicity, and history of trauma/abuse.

A core challenge in Milwaukee facing both the homeless and many low-income people is a lack of affordable housing. Since the 2008 housing crisis, the availability of affordable housing units has steadily decreased. Milwaukee housing stock is either aging, which makes it difficult to maintain, is frequently the wrong size, expensive to heat, or as newer units come online, they are generally unaffordable to very low-income tenants. This puts them at increased risk of housing insecurity and homelessness.

Beyond the specific challenge of affordable, quality units, there is also an increased need for services such as case management, financial payees, AODA and mental health resources, homeless appropriate skill development, and employment services. Homeless service providers have specifically raised the point that while there are opportunities to access funds or partner with others to build subsidized, affordable housing, there is not a consistent or stable funding source in the State of Wisconsin to provide the wraparound services that enable those struggling with homelessness to stay in those units.

Additional, ongoing challenges that contribute to housing insecurity and homelessness are excessive screening criteria such as criminal and credit checks for subsidized housing, and landlords unwilling to work with those who have a history of housing instability, asking for excessive security deposits, taking advantage of disadvantaged tenants, discriminating against tenants unaware of fair housing protections, and renting units that are in disrepair, unsanitary, or illegally converted. Milwaukee has a significant population that is spending 50% or more of their income on rent, leaving a small margin of error to cover housing, food, and utilities each month. Large families (four or more children) have very few choices in rental units. Lastly, one financial emergency can easily put a renter at risk of eviction and/or homelessness.

The COVID-19 public health crisis and resulting economic impacts are putting the housing and health of low-income renters at further risk of eviction and/or homelessness. The potential spread of COVID-19 is especially dangerous for those that are experiencing homelessness, housing instability, or overcrowded conditions. It is not currently known how long the effects of this pandemic will last, which will make it that much more difficult for people with very- and extremely low-incomes to meet their basic needs. Milwaukee's homelessness assistance system (which is already strained), continues to work on how to address increased demand and will need to be more strongly integrated with ongoing public health and economic recovery efforts.

Nature and Extent of Homelessness

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

- a. Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.
- b. Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.
- c. Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Discussion:

Below is a general analysis of the nature and extent of homelessness in Milwaukee by reviewing data provided by the City-County Homeless Management Information System (HMIS) and feedback from Continuum of Care (CoC) member providers. Note that Milwaukee's CoC includes the City and County.

A Note on Data Related to Homelessness:

There are three (3) main sets of data to draw from for this section.

- (1) The CAPER, which provides annual program and outcome data, and includes non-housing programs such as Prevention and Street Outreach that are not included in other sources. The most recent CAPER used in this Consolidated Plan covers 10/1/18 to 9/30/19.
- (2) The Point In Time (PIT) survey: At least once a year the Milwaukee CoC performs a PIT, which is a count of persons that are living in shelters or who are unsheltered living on the streets or any other place not meant for human habitation. The most recent PIT was completed in January 2020.
- (3) The Longitudinal Systems Analysis (LSA) provides important context to how people experience homelessness over time. The most recent LSA available covers 10/1/17 to 9/30/18, as the tracking of long-term case data usually lags behind program data.

To allow for standardization of measurement and comparability over time, this plan draws mostly on data from the CAPER, with Point In Time and LSA as supplementary.

The primary conditions associated with homelessness are well documented and not unique to Milwaukee. The general consensus among CoC service providers is that these conditions are primarily low income, lack of affordable housing, alcohol and drug abuse, mental health considerations, lack of employment, age, sexual orientation and identity, unstable employment (eg. seasonal, temporary, on-demand, etc) and low education. The challenges of unstable employment have only worsened since COVID-19.

A total of 11,218 clients were served by the Continuum of Care from 10/1/18 to 9/30/19.

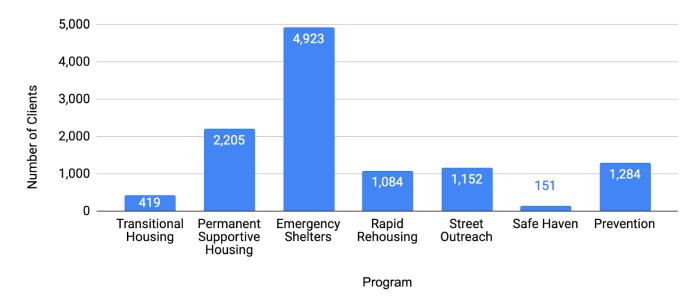
- 2,917 were under the age of 18
- 1,457 were veterans
- 1,101 were chronically homeless
- 7,931 were adult heads of households (i.e. requesting services for more than one person, a family unit)

Nearly half (48%) of the people receiving services were in Emergency Shelters or Transitional Housing, with another 29% receiving Rapid Re-Housing or Permanent Supportive Housing services. Prevention services accounted for 11% of people receiving services, with Street Outreach and Safe Haven making up the remainder at nearly 12%.

From a systems perspective, data from the Longitudinal Systems Analysis (LSA) for 10/1/17 to 9/30/18 tells us that the total number of people served during that year was 6,373 in Emergency Shelter, Transitional Housing, Rapid Re-Housing, or Permanent Supportive Housing programs. They experienced homelessness for an average of 55 days, and 31% exited to a permanent supportive housing destination. The three-year trend in terms of people exiting homelessness to a permanent destination averages 30-45%. Again, note the LSA does not include people receiving services via Street Outreach, Safe Haven, or Prevention.

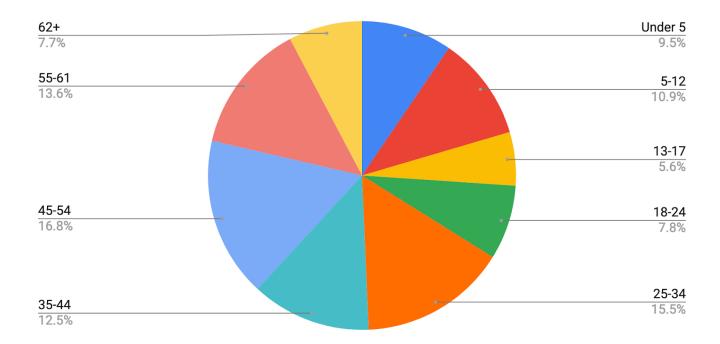
Number of Clients Served

						Number
				Number of		of
	Numbers			Adult Head		Chronicall
	of Persons			of	Number of	у
Program	served	Adults	Under 18	Household	Veterans	Homeless
Totals	11,218	8,276	2,917	7,931	1,457	1,101
Transitional Housing	419	324	95	311	218	2
Permanent Supportive Housing	2,205	1,945	259	1,884	754	734
Emergency Shelters	4,923	3,548	1,375	3,494	148	179
Rapid Rehousing	1,084	591	493	513	204	58
Street Outreach	1,152	1,065	76	1,015	36	92
Safe Haven	151	151	0	151	2	21
Prevention	1,284	652	619	563	95	15



Age of Clients Served

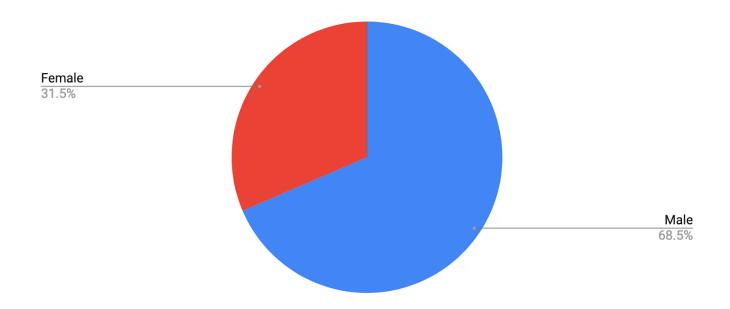
Although most people experiencing homelessness are older adults, it is important to note that about 26% of those receiving services were under the age of 17.



Program	Under 5	5-12	13-17	18-24	25-34	35-44	45-54	55-61	62+	Client Doesn' t Know / Client Refuse d	Data Not Collect ed
Totals	1,068	1,222	627	873	1,730	1,403	1,878	1,525	867	12	13
Transitional Housing	39	43	13	23	42	39	74	76	70	0	0
Permanent Supportive Housing	74	130	55	84	183	243	468	589	378	0	1
Emergency Shelters	521	509	345	406	910	673	784	518	257	0	0
Rapid Rehousing	203	227	63	125	133	89	96	89	59	0	0
Street Outreach	21	41	14	111	203	213	297	175	66	11	0
Safe Haven	0	0	0	13	22	35	48	19	14	0	0
Prevention	210	272	137	111	237	111	111	59	23	1	12

Gender of Adults Served

Information collected from Continuum of Care services providers noted that for the most part, people who experience homelessness are male, which is supported by the data below.



			Trans Female	Trans Male		Client Doesn't	
			(MTF of	(FTM or	Gender	Know /	
			Male to	Female to	Non-Conf	Client	Data Not
Program	Male	Female	Female)	Male)	orming	Refused	Collected
Totals	5,649	2,592	29	4	1	1	0
Transitional Housing	248	75	1	0	0	0	0
Permanent Supportive	1,432	501	11	1	0	0	0
Housing	1,432	301	11	ı		O	U
Emergency Shelters	2,543	999	4	2	0	0	0
Rapid Rehousing	333	255	3	0	0	0	0
Street Outreach	783	274	6	1	1	0	0
Safe Haven	101	47	3	0	0	0	0
Prevention	209	441	1	0	0	1	0

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Housing Assistance for Families with Children

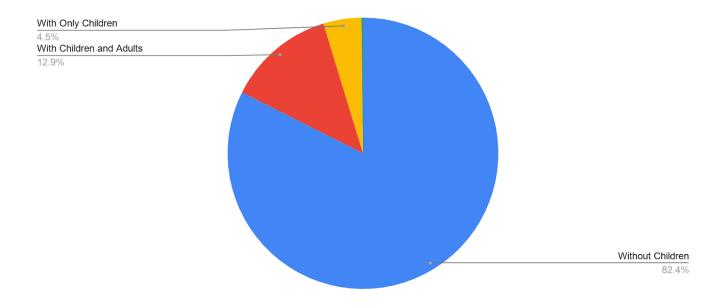
According to the ESG CAPER (10/1/18 to 9/30/19), out of a total 8,327 households receiving services from the Continuum of Care (CoC), there were 1,071 households with children and adults (12.9%), and 378 households (4.5%) comprised of only children. Additionally, the January 2020 Point In Time survey counted 65 households (at least 1 adult and 1 child) out of a total of 797 households (8.2%), a similar trend. According to the CAPER, out of the total number of people receiving services (11,218), 26% were under the age of 17.

Milwaukee Public Schools (MPS) also tracks students that are at risk for homelessness or experiencing housing insecurity. In the 2018-2019 school year, they identified 5,270 students at risk, or about 6.95% out of a total enrollment of 75,081 students. MPS has a Homeless Education Program, which works to connect families to needed resources should they experience housing insecurity; their identification rate is 6%+ higher than the national average. One of the strongest tools they have to identify need is when a family requests out-of-region transportation to get to school when their housing situation changes. An early impact of COVID-19 and the closure of schools means that the program is not able to connect with families as directly as they could. This is currently a key gap in the system's ability to identify families with children who may be experiencing homelessness.

The various data points align with feedback from the CoC and data from the 2019 City of Milwaukee Housing Affordability Report, which brings to light the shortage of affordable housing for families in the City and the difficulty in finding shelter and/or a permanent housing destination. Tangentially, there were no families classified as chronically homeless in the January 2020 Point In Time survey conducted by the CoC.

However, by mid-2020 Milwaukee has begun to see visible signs of the effects of the COVID-19 public health pandemic, with street outreach teams reporting more incidences of family homelessness.

Households Served



		Without	With Children	With Only	Unknown Household
Program	Totals	Children	and Adults	Children	Type
	8,327	6,862	1,071	378	16
Transitional Housing	311	270	41	0	0
Permanent Supportive Housing	1,887	1,763	121	2	1
Emergency Shelters	3,827	3,069	423	335	0
Rapid Rehousing	515	317	196	2	0
Street Outreach	1,030	985	33	1	11
Safe Haven	151	151	0	0	0
Prevention	606	307	257	38	4

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

Housing Assistance for Families of Veterans

According to the ESG CAPER (10/1/18 to 9/30/19), out of the total number of people receiving services from the Milwaukee Continuum of Care (Coc), 1,457, or 13% were veterans. The January 2020 Point In Time Survey found 104 Veterans (5.7%) of a total of 970 persons that day were in need of homeless services; most of them were male and sheltered.

Feedback from service providers and task force members note that while access to housing is a challenge, access to support services for veterans is just as important. Particular needs include more resources for female and transgender veterans, and HUD/VASH vouchers are sometimes not enough to cover rent over the

long-term, putting housing stability at risk again. Additional information on the needs of Veterans is also discussed in the Non-Homeless Special Needs section (NA-45).

Lastly, it is important to note that not all veterans-serving organizations are members of the CoC or report into the City-County HMIS. Many opt to focus on private funding sources so as not to exclude any veteran from services. Organizations such as DryHootch, Milwaukee Homeless Veterans Initiative (MHVI), Vets Place Central are not members of the CoC. For example, the MHVI Outreach Program reached over 300 veterans and connected them to services, and served 350 veterans with case management services via their Crisis Management program (2018 Annual Report).

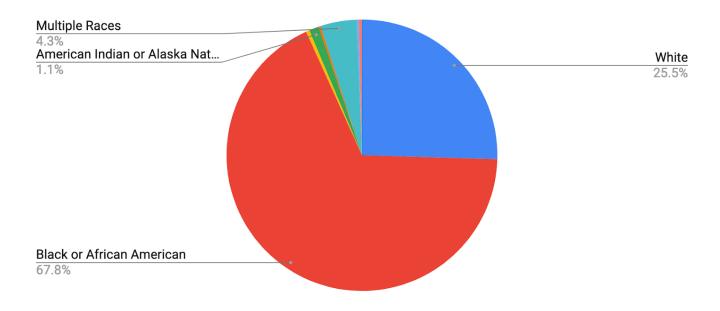
Nature and Extent of Homelessness by Racial & Ethnic Group

The race/Ethnicity of the largest groups experiencing homelessness in Milwaukee are those identifying as Black/African-Americans at 68%, those identifying as Whites at 26%, and those identifying as Hispanic/Latino at 9% (ESG CAPER 10/1/18 to 9/30/19).

This aligns with January 2020 Point In Time survey data, which found 62% of persons counted were Black/African-American, 32% were White, 3.9% identified as Multiple Races, 1.1% American Indian or Alaska Native, 0.6% as Native Hawaiian or Pacific Island, 0.3% as Asian, and 9.9% identified as Hispanic/Latino.

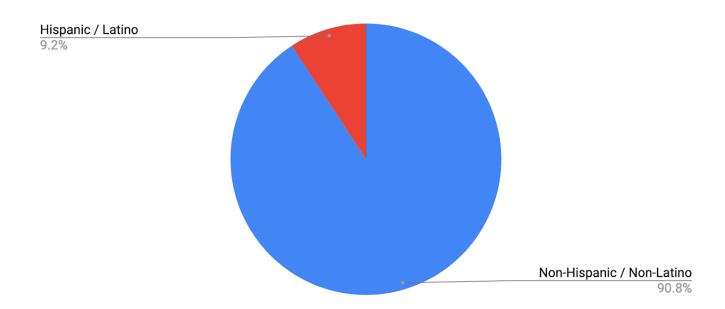
Blacks are vastly overrepresented based on the percentage of the general population, which was also included in feedback from Continuum of Care service providers. The charts below show the makeup of clients by race/Ethnicity for each program area.

Race of Clients Served



		Black or African		America n Indian or	Native Haqaiia n or Other		Client Doesn't Know /	Data Nat
Program	White	Americ an	Asian	Alaska Native	Pacific Islander	Multipl e Races	Client Refused	Data Not Collected
Totals	2,856	7,601	47	129	28	486	28	43
Transitional Housing	126	263	0	10	1	19	0	0
Permanent Supportive Housing	786	1,306	6	20	4	80	2	1
Emergency Shelters	1,171	3,432	26	52	15	227	0	0
Rapid Rehousing	198	808	2	16	4	56	0	0
Street Outreach	364	700	7	17	2	45	11	6
Safe Haven	59	80	1	2	1	8	0	0
Prevention	152	1,012	5	12	1	51	15	36

Ethnicity of Clients Served

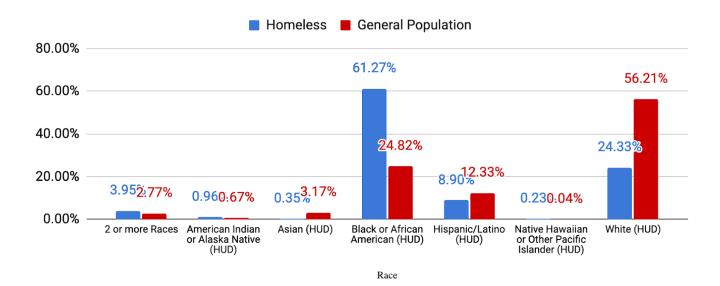


Program	Non-Hispani c / Non-Latino	Hispanic / Latino	Client Doesn't Know / Client Refused	Data Not Collected
Totals	10,126	1,030	22	40
Transitional Housing	381	38	0	0
Permanent Supportive Housing	2,068	136	0	1
Emergency Shelters	4,432	486	1	4
Rapid Rehousing	978	106	0	0
Street Outreach	1,038	107	7	0
Safe Haven	131	20	0	0
Prevention	1,098	137	14	35

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

Homeless vs General Population

The following table also compares the race/Ethnicity of clients in the homeless services system to the demographics of Milwaukee County, further demonstrating the overrepresentation of Blacks/African-Americans in the homeless population.



			Populatio			% of
			n -		%	Populatio
		% of	MIlwauke		Differenc	n That Is
Race	Clients	Homeless	e County	Pop %	е	Homeless
Totals	11,720		1,022,345			
2 or more Races	463	3.95%	28,293	2.77%	1.18%	1.64%
American Indian or Alaska Native	113	0.96%	6,808	0.67%	0.30%	1.66%
(HUD)	113	0.5070	0,000	0.0770	0.5070	1.0070
Asian (HUD)	41	0.35%	32,422	3.17%	-2.82%	0.13%
Black or African American (HUD)	7,181	61.27%	253,764	24.82%	36.45%	2.83%
Hispanic/Latino (HUD)	1,043	8.90%	126,039	12.33%	-3.43%	0.83%
Native Hawaiian or Other Pacific	27	0.23%	363	0.04%	0.19%	7.44%
Islander (HUD)	21	0.23%	303	0.0470	0.1970	7. 44 70
White (HUD)	2,852	24.33%	574,656	56.21%	-31.88%	0.50%

Data Source: Institute for Community Alliances / Milwaukee HMIS (10/1/18 to 9/30/19)

Nature and Extent of Unsheltered and Sheltered Homelessness

To summarize demographic and program data from the 2018-2019 Milwaukee HMIS ESG CAPER report, 11,218 people experienced homelessness and are:

- Most adults (74%), with 17% ages 45-54, 15% ages 25-34, 14% ages 55-61, and 13% ages 35-41.
- 68% are Black/African American, with those identifying as Whites at 26%, and those identifying as Hispanic/Latino at 9%.
- Most identify as Male (68.5%).
- 13% of households served included at least one child.
- 1,101 people (nearly 10%) are categorized as chronically homeless.
- About 13% are Veterans.
- Nearly half (48%) of the people receiving services were in Emergency Shelters or Transitional Housing.
- Another 29% received Rapid Re-Housing or Permanent Supportive Housing services.

Additionally, Milwaukee Continuum of Care (CoC) service providers reiterated that most of the people they serve are single males and Black/African-American; and when it comes to youth homelessness, the majority are unsheltered but not necessarily on the streets, so are not often tracked as "homeless" by HUD definition.

POINT IN TIME SURVEY

This annual survey provides another snapshot of homelessness in Milwaukee. The count is intended to include persons that are homeless and are living in emergency shelters, transitional housing, safe havens for the homeless, domestic violence shelters, or who are unsheltered living on the streets or any other place not meant for human habitation. In 2020, the Point In Time methodology was adjusted to count guests at warming rooms as sheltered rather than unsheltered, which is where they were traditionally counted.

Data from the January 2020 Point In Time count is summarized in the table below; which aligns with data in the 2018-2019 ESG CAPER. The majority of people counted in the survey are sheltered (91%) and about 18% of people (sheltered and unsheltered) were under the age of 18. Nearly 83% of those that are unsheltered have a serious mental illness or a substance use disorder, and 7.5% of all people counted are considered chronically homeless.

Point In Time (January 2020)	Sheltered	Unsheltere d	Total	% of Total
Total Number of Households	710	87	797	
Total Number of Persons (Adults & Children)	883	87	970	
Number of Persons (Under age 18)	171	0	171	17.6%
Unaccompanied Youth	44	11	55	5.7%
Veterans	98	6	104	10.7%
Adults with Serious Mental Illness	221	40	261	26.9%
Adults with a Substance Use Disorder	111	32	143	14.7%
Adults with HIV/AIDS	3	2	5	0.5%
Adult Survivors of Domestic Violence	69	7	76	9.5%
Number of Chronically Homeless	63	10	73	7.5%

Data Source: Milwaukee Continuum of Care 2020 Point in Time Survey

OTHER ISSUES IMPACTING HOUSING STABILITY

The 2018-2019 ESG CAPER report provides additional detail on issues that can impact a person's housing security. Below is an assessment of related data on a number of issues Continuum of Care (CoC) service providers indicated were often connected to a homelessness experience.

Housing Status: Prior to receiving services, nearly 48% (4,121 people) were literally homeless, meaning they were living in a place not meant for habitation. Other than that, the most prevalent types of former living situations for people experiencing homelessness include:

Prior Living Situation by Rank	% of total	TOTAL
(1) Place not meant for habitation	47.5%	4121
(2) Emergency Shelter (including hotel/motel paid with emergency shelter voucher)	20.2%	1756
(3) Staying or living with a family member	7.1%	613
(4) Rental by client, no housing subsidy	5.2%	451
(5) Staying or living with a friend	4.1%	353
(6) Transitional housing for homeless persons	3.6%	314
(7) Hospital non-psychiatric	2.3%	201
(9) Safe Haven	2.0%	175
(10) Psychiatric hospital or other psychiatric facility	1.4%	119
(11) Jail, prison or juvenile detention facility	1.2%	107
(12) Hotel or motel paid for without shelter voucher	1.0%	91
(13) Substance abuse treatment facility or detox center	0.9%	75
(14) Foster care home or group home	0.3%	26

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

<u>Length of Homelessness</u>: Milwaukee CoC service providers also track the length of time that a person experiences homelessness prior to receiving assistance. In the 2018-2019 ESG CAPER, most people (nearly 30%) shared that their episode of homelessness was 1 week or less; the next highest was 2-6 months at 19.9%. The data also shows that 20.5% of people in our community experienced homelessness for six months or longer.

		Total
Length of Homelessness	% of Total	People
1 week or less	29.9%	2971
1 week to 1 month	6.0%	595
1-2 months	6.3%	630
2-6 months	18.8%	1869
6 months to 1 year	10.2%	1015
1 year or longer	10.3%	1027

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

The data was also reviewed to determine if single adults or adults with children (i.e. families) experienced homelessness at different lengths. However, the trend was the same with the highest percentage of people experiencing homelessness for 1 week or less (35.1% for single adults; 40.3% for adults with children), and 2-6 months (21.1% for single adults; 27.6% for adults with children).

<u>Domestic Violence</u>: According to data from the 2018-2019 ESG CAPER, just over 13% of people receiving homeless services indicated that they have a history with domestic violence and 4.3% were fleeing a domestic violence situation. The January 2020 Point In Time survey found that 76 of the 970 adults counted (7.8%) were adult survivors of domestic violence.

People with Disabilities: Over 9,000 people that received homeless services in the 2018-2019 ESG CAPER year indicated they had a disabling condition or health situation that requires additional services. As the table details below, just a third experience mental health issues, and nearly 22% have a developmental or physical disability. This is a significant number of people, and such conditions can be a barrier to accessing safe, affordable housing.

People with Disabilities	% of Total
Have a mental health problem	33.2%
Have a substance abuse disorder	17.6%
Have a chronic health condition	11.2%
Have a developmental or physical disability	21.6%
Have HIV/AIDS	0.8%

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

Milwaukee Continuum of Care (CoC) service providers also provided additional context, sharing that those they serve in shelter tend to experience mental health or substance abuse issues that impact their ability to engage in case management services and maintain employment. They also noted that the service delivery system, particularly for those that have mental and/or behavioral health issues, is somewhat disjointed. Not all shelters or housing subsidies come with the supportive services needed for people to stabilize, or require

a person to be defined as chronically homeless to qualify. There are few permanent, supportive housing options for non-chronically homeless people. Also, families with an adult or children that have disabilities or special needs struggle to find affordable, safe, and accessible housing.

<u>Income & Access to Benefits</u>: Almost one-third of people experiencing homelessness have no income, and about 24% receive a limited or fixed income via the Federal government. About 44% receive non-cash benefits such as food assistance and child care. Income supports are a critical part of ensuring that people experiencing homelessness can transition to permanent affordable housing, and access support services that ensure long-term stability.

Income & Non-Cash Benefits	% of Total
People that have no income	28.5%
People with earned or other income such as retirement, spousal support	
etc.	14.6%
People with income from the government (SSI/SSDI, TANF, VA,	
Unemployment)	23.9%
People receiving non-cash benefits (SNAP, WIC, Child Care, etc.)	43.9%

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

<u>Health Insurance Status</u>: Along with income supports, access to health care is a critical component of assisting those experiencing homelessness; this is particularly important when considering the significant number of people that have health issues or a disabling condition. According to data from the 2018-2019 ESG CAPER, about 73% of people do have access to some sort of health insurance service, but nearly 13% indicated they do not have any form of health insurance to cover their care.

Health Insurance Status	% ot Total
Medicaid/Medicare	29.4%
State Health Insurance (Adults/CHIP)	33.8%
Employer-provided, private pay or COBRA	1.4%
Other (VA, Indian Health Services, other)	8.1%
No Health Insurance	12.9%

Data Source: Milwaukee HMIS ESG CAPER (10/1/18 to 9/30/19)

Chronically Homeless: This is a specific category designated by HUD to target interventions for individuals who are most in need, i.e. have had consecutive or periodic episodes of homelessness at a higher frequency than others. A person is chronically homeless *if s/he has a disabling condition, e.g. diagnosable substance abuse disorder, serious mental illness, developmental disability, and/or chronic physical illness or disability, and has been continuously homeless for one year or has experienced four or more episodes of homelessness in the past three years.* In general, permanent supportive housing (PSH) programs that provide a broader range of wraparound services, are targeted for those that experience chronic homelessness.

Since the previous Consolidated Plan, Milwaukee has made progress on reducing the number of persons defined as chronically homeless. Milwaukee's Homeless Management Information System (HMIS) recorded 1,101 persons as chronically homeless from 10/1/18 to 9/30/19, nearly 10% of the total number of people

receiving homeless services (11,218) in that same time frame. In 2013, 12.7% of persons experiencing homelessness were considered chronically homeless (1,318 out of 12,067).

Additionally, from 10/1/18 to 9/30/19, the number of people that moved to permanent supportive housing was 2,205, an increase of 57% as compared to 2013 (948 people). Because Milwaukee's Continuum of Care (CoC) focuses permanent supportive housing units on the chronically homeless, this has helped address this need. CoC service providers share consensus that "Housing First" and permanent supportive housing programs meet the needs of chronically homeless individuals, but one gap is the need for additional protective payee services and peer support programs, where individuals with lived homelessness experience provide support to others by explicitly drawing on their personal experience.

Supportive Services:

As demonstrated by the data above, access to services such as health care, treatment for mental health and substance abuse disorders, income supports, and non-cash benefits are all critical needs along with housing subsidies for ensuring long-term stability for those experiencing homelessness. These services are best delivered in a case management model that also utilizes mainstream services.

Milwaukee CoC service providers widely agreed that consistent, financial support to provide long-term case management services continues to be a challenge for most organizations. Funding is not systematic, and it is difficult to track the various eligibility-specific sources in a human services system that is complex and not often easy to navigate. There is a lack of protective payee services that also provide case management services. While Rapid Re-Housing is effective for getting people safely and quickly housed, there is a gap in "transitional" case management services to ensure they remain stable for well past 6 months.

Other gaps in supportive services include effective employment services, consistent mental health services from contractor to contractor, child-focused services to navigate school transitions, access to on-site health or medical care at area shelters, access to better income support, and services focused on the following:

- People leaving the criminal justice systems;
- Victims of trafficking or exploitation;
- Seniors and those aging in place and/or are experiencing dementia or early Alzheimer's; and
- Medically-based physical conditions may need more care.

Summary

Housing insecurity leading to homelessness disproportionately affects Blacks/African-Americans more than any other racial/ethnic group in Milwaukee, and just over 68% of those experiencing homelessness are men. Although most people experiencing homelessness are older adults, it is important to note that about 26% of those receiving services were under the age of 17, and 13% of households served included at least one child. Additionally, those experiencing homelessness also disproportionately experience the effects of a disabling condition.

The second was Community shelters and other services for the homeless such as; Better Outreach & Coordinated Entry (CE), Support for warming rooms and Homelessness Prevention both financial, medical care as well as mental health services.

- (1) Work with Continuum of Care to strengthen outreach network & Coordinated Entry (CE) system (i.e. street and school-based outreach, reduce the rate of return, etc.)
- (2) Continue to support Emergency Shelter and warming room programs
- (3) Provide housing assistance (i.e. Rapid Re-housing, financial assistance, services, etc.)
- (4) Invest in efforts that transition people to permanent, supportive housing
 - Support development of units for very to extremely low-income
 - More funding for case management programs & supportive services (i.e. look at stronger integration of medical care and mental health services with housing)
- (5) Support homeless prevention efforts (i.e. coordinate with Milwaukee County service providers, food pantry network, higher educational institutions, resources to prevent/mitigate eviction, etc. to reach different populations)

Milwaukee continues to increase its investments over time in early intervention programs such as Prevention, Rapid Re-Housing, and Street Outreach to reduce stays in emergency shelters. These services represent just over 31% of all services provided in the 2018-2019 ESG CAPER report and increase from the previous Consolidated Plan period. However, there continues to be a lack of stable, consistent funding sources for these and other supportive services, particularly those that are linked to affordable housing units that are not necessarily targeted to individuals who are chronically homeless. And although there has been progressively reducing the number of chronically homeless in Milwaukee, it remains a need particularly as homelessness has become more visible.

Lastly, the COVID-19 public health crisis and economic impacts continue to put the housing and health of low-income renters at further risk of eviction and/or homelessness, making it more difficult for individuals and families to meet their basic needs.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d) Introduction

The following section describes specific groups in our community that have special needs that impact their economic and housing stability. They include Individuals Living with HIV/AIDs, Seniors/Elderly, Veterans, People with Disabilities, Formerly Incarcerated Individuals, and Immigrants/Refugees. These groups, in particular, often require not only housing assistance but also supportive services.

The following charts provide data required by HUD related to Individuals Living with HIV/AIDS-related to the Housing Opportunities for Persons with AIDS (HOPWA) program. Note that the City of Milwaukee HOPWA grant covers the Metropolitan Statistical Area (MSA), and two agencies provide services. The data below provided by the Wisconsin Department of Health Services for Milwaukee County only.

Current HOPWA formula use:	
Cumulative cases of AIDS reported (2010-2019)	1,232
Area incidence of AIDS (2019)	122
Rate per population (2019)	11.9
Number of new total cases prior year (2018)	114
Rate per population (Average 2017-2019)	12.5

Current HIV surveillance data:	
Number of Persons Living with HIV (PLWH)	3,445
Area Prevalence (2019)	341.0
Number of new HIV cases reported last year (2019)	112

Table 29 - HOPWA Data

Data Source: Reported Cases of HIV Infection MILWAUKEE COUNTY, 2014-2019 https://www.dhs.wisconsin.gov/publications/p0/p00766-milwaukee.pdf

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	120
Short-term Rent, Mortgage, and Utility	100
Facility-Based Housing (Permanent, short-term or	
transitional)	25

Table 30 - HIV Housing Need

Data Sources: HOPWA Performance Profile: the City of Milwaukee, 1/1/2018 to 12/31/2018 and service provider responses.

Describe the characteristics of special needs populations in your community:

Poverty, segregation, racism, and inequality compound the issues faced by special needs people in the City of Milwaukee. It is important to note that these factors are underlying issues across the needs of specific populations described below. The next section, NA-50 Non-Housing Community Development Needs, provides additional detail on how poverty, racism, and segregation impact the City's needs.

This section focuses on seniors, veterans, people with disabilities, formerly incarcerated people, immigrants and refugees. Following that is a specific section for individuals living with HIV/AIDS. Those groups mainly make up the non-homeless special needs service area.

Seniors/Elderly

About 10.2% (about 60,000 people) of the City's population is over 65 years old, and approximately 11,907 of Milwaukee's households are headed by individuals who are 65 and older (U.S. Census Bureau). Of the total population living below the Federal Poverty Level, 14.2% (or about 8,500) are 65 or older (Milwaukee Health Compass Data: http://www.healthcompassmilwaukee.org/indicators/index/dashboard?alias=allindicators). A substantial number of older adults in Milwaukee live on a total household income that averages between \$12,000 and \$25,000 per year.

Rising rents are of great concern to seniors, and the City currently has about 39,000 seniors that will either need to age in place or find appropriate housing. Senior renters have difficulty accessing safe, affordable housing options and often live in places that are accessible space and have limited resources with their fixed incomes. Milwaukee Health Compass notes that 35.4% of people who are 65+ in the City of Milwaukee live alone, and 19.9% of adults 65+ state they have an independent living difficulty. The Milwaukee County Department on Aging reports a growing number of older adults are having trouble accessing affordable housing.

Seniors who own their homes are less able to conduct regular and preventative maintenance, so many face costly repairs to roofs, porches, and plumbing due to deferred maintenance. While there are repair programs available to serve senior homeowners living in the City of Milwaukee, it is up to the homeowner to seek out and apply for programs - a task that can be confusing and daunting, particularly for those without a support system or internet access.

Whether seniors rent or own, community input shared for this plan identified aging in place as an essential value and goal. For persons living independently, their homes or apartments need accessibility modifications, assistive devices, and regular/preventative home care and maintenance support. Seniors and nonprofit organizations would benefit from expanded or new affordable, permanent housing with supportive services solutions, such as that offered through HUD Section 202 Supportive Housing Program for the Elderly.

Veterans

Milwaukee's veteran population includes individuals from all races, ethnicities, ages, gender identities, and educational attainment levels. Veterans' needs and services are discussed explicitly in other parts of the Consolidated Plan, particularly related to homelessness (NA-40 and MA-30). Community input survey feedback and interviews with veterans services providers shared that key issues for veterans include higher rates of housing insecurity, physical health, mental health, and alcohol or other substance abuse issues. In

particular, substance abuse issues may prevent veterans from being accepted into shelters or other programs, so many remain on the street.

Affordable housing, physical and mental health care, and AODA services remain critical needs. Once connected to a veterans-serving organization, they often work to create a housing and services plan. While the Housing Authority of the City of Milwaukee (HACM) has increased the number of Veterans Affairs Supportive Housing (VASH) housing vouchers in recent years, the connection between affordable housing and transportation and employment opportunities was also shared in focus groups and survey responses. Service providers stated that veterans are often unable to start their civilian life with many assets due to military service and can face issues related to financial stability.

But if they are not working with an organization, navigating the bureaucracy of resources can be challenging. Whether through the Veterans Administration (VA) or community-based organizations, access to and awareness of resources are a real challenge for veterans. Participants shared a lack of coordination among veteran-serving agencies (including the VA) and other social service entities such as the Continuum of Care (CoC).

Focus groups with professionals serving veterans indicated that those who have served tend to need support from agencies specifically dedicated to working with veterans and their families, particularly when it comes to employment and housing/homelessness prevention. For example, several service providers noted that their clients see less success when a veteran is referred to an employment agency that serves the community-at-large with no specialized programming or staff to work specifically with a veteran.

People with Disabilities

In July of 1990, the American with Disabilities Act became law, yet people with disabilities continue to experience inequalities related to access to housing, employment, and education. The CDC's "Snapshot of Disability in Wisconsin" states that 22.7% of adults in the state have some type of disability. The National Disability Institute and Milwaukee Health Compass state that 12.6% of people (74,600) in the City of Milwaukee identify as a person with a disability. Additionally, it is well known that as people age, the likelihood of developing a disability increases. In the City of Milwaukee, 39.7% of adults 65+ (31,160) live with a disability (Milwaukee Health Compass:

http://www.healthcompassmilwaukee.org/indicators/index/dashboard?alias=allindicators).

There is no single method to define *disabilities* other than it is a category that includes anyone that needs support, accessing vision, hearing, cognitive, mobility, and mental health services. Likewise, the barriers that people with disabilities face are directly related to the type of disability they experience. Housing and transportation in particular are vital areas that present common obstacles to many, if not all, persons with disabilities. These two areas determine all aspects of an individual's quality of life and, in many cases, death.

People with disabilities also experience significant disparities when it comes to income, employment, earnings, educational attainment, and housing. According to the National Disability Institute, about 45% of working-age people (18-64) with disabilities live below poverty, compared to 20% of those without disabilities; and about 25% of working-age people are employed compared with 77% of those without disabilities. Among those working, 15,000+ people (63% of workers with disabilities) are earning less than \$25,000/year compared to 44% of those without disabilities. Lastly, 37% of households with a person with a disability pay more than

50% of their income for housing, compared with 20% of those with no disability in the Milwaukee-Waukesha-West Allis Metropolitan Statistical Area (MSA). [See "Milwaukee, Wisconsin: From a Disability Perspective" from the National Disability Institute in the appendix for detail, including maps that show disability as a percentage of population, compared to low and moderate income areas.]

A recent report by the National Disability Institute updated previous research on the financial conditions of individuals by disability status and racial/ethnic identity to take into account the impacts of COVID-19. *Race, Ethnicity and Disability: The Financial Impact of Systemic Inequality and Intersectionality* (National Disability Institute, August 2020), found that Black individuals with disabilities suffered the highest rate of job loss between January-May 2020, with a similar but less dramatic drop for Latino/a households. Additionally, with the intersection of disability and chronic health conditions this group of people are the most vulnerable, and most impacted by having a lower income, higher housing cost burden, and need for services. This is a financially vulnerable population.

The connection between housing, physical health, and mental well-being has been explored by the healthcare members of the Milwaukee Health Care Partnership, a public/private consortium dedicated to improving health care for low-income and underserved populations in Milwaukee county. In 2019, the MHCP conducted the Community Health Needs Assessment (CHNA) to research individuals' health needs in Milwaukee County, which also resulted in the Milwaukee Health Compass data site referenced earlier.

The following were identified as the community's top health issues by critical informants and survey respondents: Mental Health (79%); Access to Healthcare (62%); Violence (46%); Substance Use (31%); Nutrition (29 %); Healthy food (26%); Chronic Disease (18%). Mental Health (as defined as a state of successful mental function, resulting in productive activities, fulfilling relationships, and the ability to adapt and cope with challenges) was identified as the top health issue by CHNA participants. Mental health is essential to personal well-being, relationships, and the ability to contribute to society; many of the barriers related to mental health also present obstacles to accessing safe, affordable housing, steady employment, and transportation.

The Milwaukee Health Compass notes that 40.4% of persons with a disability are living in poverty, which translates to just over 30,000 people in the City of Milwaukee; and the National Disability Institute found that 37% of households with a person with a disability pay more than 50% of their income for housing in the MSA. While Milwaukee's public housing inventory has been updated to offer more accessible units, the need is still greater than supply, so when housing is secured, it may not be ideal as to location, condition, type, and accessibility modifications. Furthermore, people with disabilities face the added burden of finding property owners who will accept their form of rental payment or work with their SSI income limitations.

Private housing developments are being encouraged to provide accessible housing but this is an ongoing effort. While the Fair Housing Act requires landlords to accept "reasonable accommodations" for people with disabilities, many substantive adaptations are not covered and must be made at the tenant's expense as there are limited programs and funds available to renters to make accommodations to a property. For example, the local organization Revitalize Milwaukee provides free home repairs to elderly, disabled and veteran homeowners living in Milwaukee and Waukesha counties, but it does not serve renters. Long Term Care programs will cover some home modifications for accessibility, safety, and independence, although program funding is frequently an issue. Issues that people with disabilities typically struggle within their homes are access in and out of home, use of bathrooms, and lack of resources for home maintenance and repair.

Should suitable housing be secured, reliable, safe, and affordable transportation is another issue for people with disabilities. Depending on the level of assistance needed, a person with disabilities may find daily activities difficult to navigate. According to the National Disability Institute, people with disabilities tend to reside in areas that are high poverty which are also void of healthy food access, employment opportunities, and health services. At the same time, family members do not always have transportation means themselves and are not afforded time off for caregiving, forcing a person with disabilities to rely on public transportation to get to everyday necessities like groceries, doctor's appointments, jobs, and social services. In the absence of a coordinated, reliable, and robust transportation system, people with disabilities may find themselves stranded and vulnerable. In the City of Milwaukee, people with disabilities and organizations serving them often advocate for transit-related enhancements like additional rideshare options (Uber/Lyft), more accessible taxi cabs/vans, expanded bus routes, additional curb cuts, and better/timely snow and ice removal on sidewalks.

Formerly Incarcerated

A 2013 study conducted by John Pawasarat and Lois M. Quinn of the Employment and Training Institute (ETI) at the University of Wisconsin-Milwaukee found that "State DOC records show incarceration rates at epidemic levels for African American males in Milwaukee County. Over half of African American men in their 30s and half of men in their early 40s have been incarcerated in state correctional facilities" (Wisconsin's Mass Incarceration of African American Males: Workforce Challenges for 2013). The challenges faced by the formerly incarcerated have not changed significantly since the previous Consolidated Plan.

In most recent years, the main reasons for arrest include drug possession and unpaid municipal citations, both of which come with hefty fines and high bail amounts that force many to not only go to jail but stay for long periods of time. The state of Wisconsin operates on a cash bail system, so for those too poor to pay upfront, they find their pre-incarceration issues exacerbated by developing or growing a criminal record, loss of employment during jail time and driver's license suspension that lasts for months or years. Those with criminal records face barriers to obtaining housing, jobs, credit, and other necessities, like a driver's license, that may help them stabilize their lives post-incarceration.

Proactive housing support for formerly incarcerated people is an important strategy of the Milwaukee Reentry Council to advance racial equity and reduce recidivism while addressing serious barriers faced by those with a criminal record to obtain housing once they return to their communities. For example, the Housing Authority of the City of Milwaukee has great discretion in allowing formerly incarcerated individuals to reside in City public housing, despite updated HUD guidelines. Additionally, in many instances, public and private landlords prohibit family members from letting the formerly incarcerated person reside in their former residence, making it challenging for an individual to restart and reconnect with their family and community during a probationary period. Furthermore, most property owners/landlords perform credit checks, charge up-front application fees, and high-security deposits, ask for personal and professional references, and require applicants to indicate their criminal history on applications all in order to be considered for a rental unit. Anyone of these practices can disqualify an individual who has spent time in prison, away from the community and employment market, from successfully qualifying for housing. This list of barriers forces many formerly incarcerated individuals to live in hotels or motels, just steps from homelessness.

For those returning to society without a driver's license, the cost is great. One Milwaukee zip code, in particular, 53206, has a long history of economic segregation, redlining, lack of employment, and other opportunities; it also sees one of the highest rates of incarcerated and returning citizens in the City of Milwaukee. With limited access to employment opportunities within the neighborhood, it is imperative to have the ability to travel to social service/employment agencies, interviews, and ultimately full or part-time work. Those without a driver's license are at a serious disadvantage when it comes to obtaining and maintaining employment which helps alleviate the chance of recidivism. Drivers license recovery programs exist in Milwaukee through organizations like Wisconsin Community Services and Legal Action of Wisconsin, who need continued funding to remain a resource.

Immigrants & Refugees

In a report from the Wisconsin Department of Children and Families, Lutheran Social Services (LSS) and International Institute of Wisconsin (IIW) refugee resettlement project, 354 immigrants arrived in Milwaukee County between October 2018 and September 2019, representing more than half of the nearly 600 immigrants that came to the state of Wisconsin. They range from countries of origin all over the globe, but primarily from Burma, Afghanistan, Somali, Congo, and Pakistan. The Wisconsin Department of Children and Families notes that from 1/1/2001 to 12/31/2015 nearly 7,900 refugees settled in Milwaukee County. Four countries of origin have over 500 refugees now living in the County: Burma (3,961), Somalia (1,020), Iraq (863), and Laos (783). This data can be accessed at https://dcf.wisconsin.gov/refugee/statistics-population.

These newly minted citizens often find it difficult to assimilate into daily living in their new country. They face both cultural and language barriers, and therefore they may encounter multiple barriers to financial and housing stability. DCF and other service providers also shared that refugee populations can face some unique challenges. English literacy classes are of critical importance, and refugees also struggle with sourcing transportation and childcare. Domestic violence can often be a problem as refugees are less connected to and/or able to access community resources. Refugees often require assistance with navigating the U.S. legal system to ensure fair and equitable access to public resources.

What are the housing and supportive service needs of these populations and how are these needs determined?

In 2019 the City of Milwaukee conducted focus groups and surveys with both residents and service providers to identify housing and supportive service needs both generally, and for specific populations. A consistent theme in all public and community outreach was that the greatest need for special needs populations continues to be affordable, quality, safe housing. In Milwaukee and across Wisconsin, paying a large portion or even the majority of one's income towards housing costs is the norm. Individuals and families with special needs, by definition, have extra costs to cover on top of normal living expenses. Spending more than 30% of income on housing leaves people without the resources to cover basic needs, precipitates housing instability, and can jeopardize mental and/or physical health.

According to data from the Wisconsin Housing and Economic Development Authority (WHEDA), Milwaukee County is home to about 2,500 Low-Income Housing Tax Credit (LIHTC) units that are expiring within the next

10 years. Preserving affordable units, particularly when many LIHTC units are targeted towards special needs populations, is a considerable need for not only the City of Mllwaukee, but other communities in the region.

While the term 'safe' as it refers to housing can be broad, concerns related to safe housing that were specifically mentioned by the City of Milwaukee's Consolidated Plan community survey in 2019 included: dangerous physical condition of the property, absentee landlords who neglect home repairs that jeopardize safety (running water/refrigeration/improper doors and windows), neighborhood safety/crime rate, landlord actions around eviction, cleanliness of the property, lack of property monitoring by owners, the presence of lead in water and lack of age or disability-related modifications.

Many of these safety concerns are prevalent in low-income areas of the City where people of color, people with disabilities and other special needs populations tend to reside. Homes with lead paint and/or lead water lateral lines can create health concerns for those who live in them, especially for children 0-6 years old. For aging populations and those with disabilities, they either live on a fixed or lower income when employed, and experience poor or unsafe living conditions. Housing safety concerns, whether real or perceived, also impact property values of homes and the ability of a neighborhood to draw needed development and investment.

Specific to formerly incarcerated people, stable housing is a key predictor of success when returning to the community, and is associated with a greater likelihood of employment and a decreased likelihood of criminal activity and recidivism. Supportive services that help incarcerated individuals understand and connect with housing options before release could help those returning more effectively obtain short-term and permanent housing, and lessen the probability of entering or returning to homelessness. Increasing the availability of housing vouchers, reviewing housing applicant qualifications without criminal record requirements, and not criminally charging those who are homeless could also help this population more successfully post-incarceration.

The community engagement team gathered the following recommendations from community input regarding the needs they see in their communities which include:

- 1. Increase affordable housing units (owner-occupied, rental-rehab, & new construction)
- 2. Improve housing quality (code enforcement, home repair & rehabilitation)
- 3. Support housing accessibility & modifications
- 4. Address problem properties via demolition, clearance & remediation
- 5. Support employment, job training and workforce services
- 6. Provide education and services to homebuyers and homeowners
- 7. Improve access to healthy food
- 8. Support homeless wraparound services
- 9. Enforce and provide education on fair housing rules and regulations
- 10. Provide planning and technical assistance to community-based organizations and other partners
- 11. Offer English and basic educational classes
- 12. Assist in navigating the U.S. legal system
- 13. Improved transportation systems

While the above list is comprehensive, in particular supportive services such as employment and job training, access to legal services, healthy food, mental and physical health care would benefit all special needs groups discussed in this section.

Addressing housing affordability will require multiple policy approaches, including rising incomes, expanding funding for the preservation and construction of affordable housing, and ensuring that cities across the Milwaukee region also participate in efforts to increase access to fair, affordable housing.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area

According to the Wisconsin HIV Surveillance Annual Report (2018), 10,292 Wisconsin residents have been diagnosed with HIV infection since 1982. HIV diagnoses rose rapidly during the 1980s, peaked during 1990 (with 589 new diagnoses), and declined steeply until the early 2000s. During 2009-2018, the number of new diagnoses averaged around 240 per year. Wisconsin has a relatively lower diagnosis rate than neighboring states, but most new HIV diagnoses were in Milwaukee County (54%).

HIV disproportionately affects people of color in Wisconsin, with the percentage of new HIV diagnoses affecting people of color rising from 20% in 1982 to 66% in 2018. Although racial and ethnic minorities made up just 18% of Wisconsin's population in 2018, they consisted of 66% of new HIV diagnoses. Young men have the highest HIV diagnosis rate, and transgender people are at an exceptionally high risk of HIV infection due to stigma, discrimination, exclusion, violence, and other barriers present in health care settings.

Race or Ethnicity alone does not make someone more or less susceptible to HIV. Many social and economic factors affect populations of color to a more considerable extent than white communities in Wisconsin, putting people of color at greater risk for acquiring HIV. Social determinants of health increase the chance of exposure to HIV and reduce access to prevention services.

There is an increasing need for supportive services. As more persons with HIV live longer, the demand for supporting services connected to housing continues to grow. Persons in need of housing assistance also require integrated support services vital to transitioning to or maintaining permanent housing. Supportive services are of crucial and growing importance for persons in transitional care. These individuals can obtain the necessary support and learn skill sets to improve their chances of successfully living independently.

HOPWA service providers shared that supportive housing needs for persons with HIV/AIDS include:

- Coordinate healthcare needs with clients (i.e., appointments with primary care physicians, infectious disease specialists, other specialists depending on other diagnoses, providing transportation).
- Informing clients of drug assistant programs to assist with accessing needed medications required to obtain an intact immune system.
- Providing training on managing medication (self-managed vs. pharmacy-assisted), including education on the medicines themselves and developing a routine schedule.
- Post appointment follow-up and education by case-managers to discuss the details, outcomes, and next steps for long-term management.

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- Finance education by case managers to ensure clients have the financial stability to maintain care over time.
- Housing counseling/assistance to obtain safe, affordable housing.
- Access to food pantry/meals.
- Referrals for legal services.

NA-50 Non-Housing Community Development Needs - 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The City of Milwaukee has not traditionally used Federal HUD entitlement funds for public facilities; these projects are typically funded by using general city tax levy or other local or private funding sources. However, the Consolidated Plan community input process revealed that residents do think investment in public facilities is important. Additionally, the following needs were identified:

- 1. Improvements to streets, specifically pothole removal (rated as the highest priority).
- 2. Improvements to sidewalks to ensure additional ADA compliance.
- 3. Resources for energy conservation, asbestos removal, and historic preservation programs.
- 4. Park ground maintenance as well as improvements.
- 5. Parks, tot lots and recreational facilities upgrades.
- 6. Additional dedicated facilities for seniors, youth (teens) and families (children under 12 and mothers).

Describe how these needs were determined:

Public Facilities needs were determined through a review of the City of Milwaukee's annual budgeting process and the City's Capital Improvement Plan. Additionally, the Consolidated Plan community survey asked respondents to prioritize needs; the need for Public Facilities was captured in questions 1 and 7. Public facilities were rated at 53.43% for "high importance" and 33.26% at "moderately high importance." [See Appendices for community survey detail.]

Also, the planning team included input from the Milwaukee Department of Public Works as well as a review of the Southeastern Wisconsin Regional Planning Commission (SEWRPC) Report, VISION 2050, which did an in-depth analysis of long-range regional land use and transportation's needs.

Describe the jurisdiction's need for Public Improvements:

The City of Milwaukee covers just over 96.81 square miles, and like many older Midwest industrial cities, it is a mixture of old and new public spaces. This presents an ongoing challenge to both maintain and improve these spaces particularly in some of the oldest neighborhoods, where the median income is low to very low. Through the community survey and focus groups, residents, community and business leaders outlined the following priorities in terms of public improvement: **Surface Improvements** (streets and sidewalk maintenance and increased accessibility; alley resurfacing and restructuring of existing pavement; curb and gutter repair; construction of new streets as part of new residential commercial-industrial development; improve bike lanes pedestrian access citywide); **Electricals** (improve street lighting, cameras, and traffic control facilities; replacement of series circuitry to reduce outages; continue to retrofit buildings with the goal of energy efficiency); and **Land/Infrastructure** (brownfield remediation to foster and support economic development and business growth, lead poisoning and water laterals).

How were these needs determined?

Public Improvements needs were determined through a review of the City of Milwaukee's annual budgeting process and the City's Capital Improvement Plan. The Consolidated Plan community survey questions 1 and 7 also address Public Improvements, and additional feedback was received through focus groups and input from the Consolidated Plan Task Force.

Describe the jurisdiction's need for Public Services:

The need for Public Services is largely driven by issues directly related to the impact of poverty and deep racial and economic inequalities and the legacy of past "redlining" practices. Milwaukee County is documented as having the highest rate of residents living in poverty (19.9%) as compared to other counties in the state. And the most recent Census data shows that in the City of Milwaukee specifically, 26.6% of residents (or about 143,700 people) live in poverty [Source: Milwaukee Health Compass]. While this is trending downward, it is not doing so at a significant rate and is well above the state average (11.9%) and national average (14.1%). It is estimated that 39% of children ages 0-17 are living in households with income below the Federal Poverty Level (FPL). Residents living in poverty tend to be housing insecure, have a lower life expectancy, and lower educational and employment attainment. A key new fact in providing Public Services is that the Latino community has increased by 54% between 2000 and 2017 while Milwaukee's White population decreased and the African American population remained unchanged.

The Consolidated Plan community engagement and planning process identified a number of Public Service needs for the City of Milwaukee. When asked to rate how important investment was in various areas, community survey respondents rated Public Services, Housing Options, Homeless Assistance/Eviction Prevention, and Public Improvement as the top needs. The survey also asked respondents to rate specific areas of need within those categories. Multiple focus groups were also held in specific topic areas and the community engagement team was present at 15+ community events to gain feedback. The following issue areas drew the most response: employment and job training services, youth programs, employment services and job training programs, services for those experiencing homelessness, neighborhood safety and improvement initiatives, support for small businesses, and access to transportation.

After review and analysis of survey results and in-person meetings/events, the community engagement team organized the feedback related to Public Services in the following themes: Youth, Economic Opportunity, Public Safety & Quality of Life, and Environment/Health, which are described in further detail below.

YOUTH SERVICES:

In the Community Survey, the highest-ranking public service need was youth activities and youth employment. About 38% of survey respondents named Youth Activities as the most important public services issue and over 70% of all respondents ranked it as a first or second priority in terms of investment. Focus group sessions also provided more detail and context to the needs of youth.

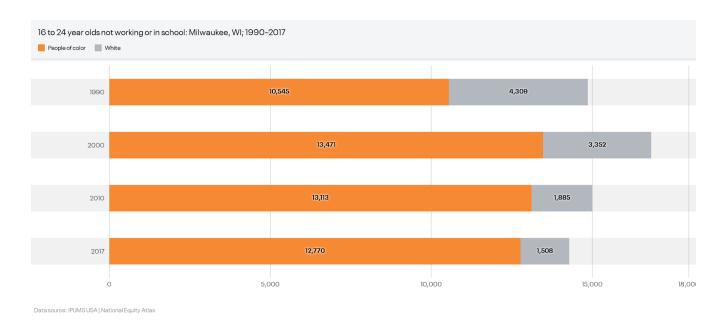
What Works

- Consistent, safe spaces for youth to access programming, recreation, and other wraparound services (i.e. leverage the community centers and public spaces/parks we have already).
- Programs that offer skill-building opportunities with real-world application (life skills, communication, financial literacy, wealth-building).
- Work experience or youth internship programs such as Earn & Learn.
- Programs that engage youth over long periods of time and "meet people where they are."
- Youth-engaging-youth model (hiring youth to be part of program design and implementation).
- Integrating trauma-informed practices into youth programs.
- A centralized place for them to find those programs and resources.

What's Needed

- Job readiness, vocational training and extra-curricular skill-building opportunities (including financial literacy) for youth, but also young adults ages 18-24.
- Housing assistance for youth (i.e. at risk for homelessness, aging out of foster care).
- Prevention/intervention programs for at-risk youth (decrease youth violence, LGBTQ youth).
- Continued support for neighborhood-based programs for youth (tutoring, mentoring, safe havens, community centers, life skills, educational attainment). In particular the need for more programs for young men of color on the south side of the City was mentioned.
- Integration of trauma-informed practices in youth programs.
- Opportunities for civic engagement & leadership in the community.

The community feedback is in line with other best practices around youth engagement, with a focus on ensuring they are prepared to enter the workforce. Access to education and job experiences early in life is critical; without that the longer term impacts could include lower earnings and increased chances of unemployment. The National Equity Atlas has a series of indicators that provide additional insight, including one one on disconnected youth that tracks the number of 16 to 24 year olds not working or in school over time.



While there has been an overall decrease in youth not working or in school since 2000 in the City of Milwaukee, this has been largely for white youth, with the share of youth of color who are disconnected remaining largely persistent. This mirrors the national trend, with an overall increase in the number of disconnected youth, and particularly youth of color. The data shows that Native American and Black youth are more likely to not be working or in school; with this trend persisting over time (www.nationalequityatlas.org/indicators/Disconnected youth#/).

ECONOMIC OPPORTUNITY

When thinking about Public Service needs related to economic opportunity, it is worthwhile to revisit the table below from the City of Milwaukee's 2019 Housing Affordability report, which describes key economic statistics for the City and compared to surrounding communities.

Key Comparative 2017 Income Indicators

	City of Milwaukee	Milwaukee County	Metro Milwaukee
Median Household Income (in 2017 dollars)	\$38,289	\$46,784	\$57,531
Median Per Capita Income (in 2017 dollars)	\$22,918	\$27,046	\$30,973
Percent Below Poverty Level	24.0%	18.3%	13.1%
Percent with Bachelor's Degree or Higher (B`5002)	23.8%	30.1%	34.5%
Unemployment Rate (Population 16 years and over)	9.0%	7.1%	5.5%

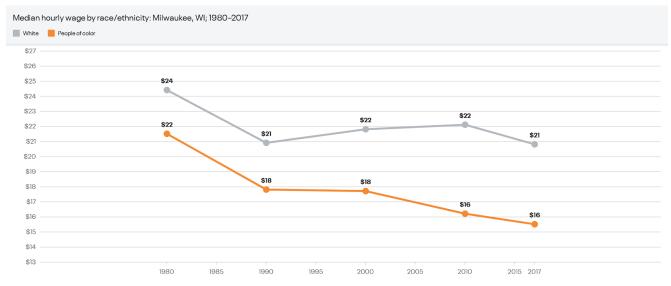
Data Source: City of Milwaukee Department of City Development. 2017 5 Year American Community Survey

With a lower median household income and higher rates of poverty and unemployment, the City of Milwaukee faces significant challenges when it comes to ensuring access to economic opportunity for its

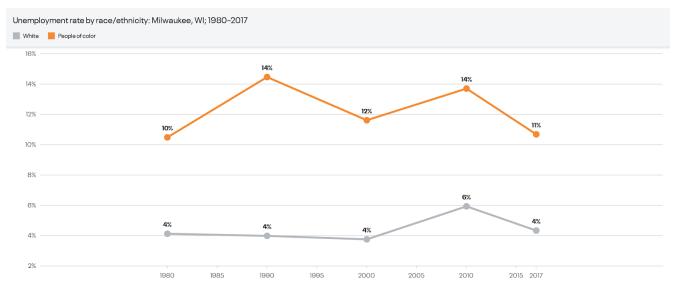
residents. Additionally, about 77,000 (or 34%) of City households earned less than \$25,000 in 2017 and generally have a more severe housing cost burden. This leaves few resources to meet other basic needs. Another way to think about this is related to wages and housing affordability. Wisconsin is one of twenty-one states with a minimum wage equal to the federal minimum (\$7.25 per hour). Based on Federal housing affordability guidelines, a person would have to work 91 hours per week at that rate to afford a home at the median rent cost in Milwaukee County.

There are also significant racial disparities when looking at economic indicators by race. For example, according to the National Equity Atlas, the 2015 median wage for non-white workers was \$5 less than the median wage for white workers in the City of Milwaukee, and the unemployment rate disparities between white people and people of color remains persistent

[www.nationalequityatlas.org/indicators#Economic%20vitality].



Data source: IPUMS USA | National Equity Atlas



Data source: IPUMS USA | National Equity Atlas

The Social Development Commission's Community Needs Assessments (2015-16 and 2019) continue to find that the key factors influencing poverty in Milwaukee center around quality affordable housing, jobs with living wages, and economic development that creates new businesses. It also showed that there is a need for partnership among social service agencies and public health entities to improve health care outcomes for the most vulnerable in our city.

The City of Milwaukee Health Department Office of Violence Prevention "Blueprint for Peace" plan identified economic issues such as limited employment, segregation from opportunity, neighborhood disinvestment, poverty, and the lack of economic support as risk factors that can increase the likelihood of violence.

Furthermore, Milwaukee's residential segregation has been studied for decades by local and national researchers and policymakers. The impact it has on the socio-economic gap between African American/Black residents and White residents in particular as it relates to income, employment, loan/capital access, health outcomes, educational attainment, and incarceration rates has been cited in numerous national studies.

In recent years, the City of Milwaukee has experienced a significant amount of development in its downtown that has brought great opportunity but also new concerns about how this growth can benefit Milwaukee neighborhoods. A new effort, MKE United, emerged to develop a shared and inclusive vision for Milwaukee's Greater Downtown. Key elements include strengthening local businesses and neighborhoods of choice, enhancing public safety, expanding educational opportunities, attractive, affordable housing, improved job access (particularly for residents in the surrounding neighborhoods), and a regional transit agenda that connects city residents to job opportunities. For example, MKE United notes that 40-60% of neighborhoods with household median incomes below \$25,000 are also 40-60% less likely to own a car, reducing their access to employment opportunities in the region. [MKE United 2018 Summary: https://drive.google.com/file/d/1qU_vb56NbbbmoSck7gUxOWvPvq7mKAFK/view].

This has also brought concerns related to potential displacement as economic development continues. For example, on the north edge of Milwaukee's downtown near two HUD public housing developments is the new home of the Milwaukee Bucks, a \$524 million investment that has brought new opportunities and challenges to the Bronzeville neighborhood. In 2018 the City of Milwaukee Department of City Development released the report "A Place in the Neighborhood - An Anti-Displacement Plan for Neighborhoods Surrounding Downtown Milwaukee" that defines the scope and metrics for measuring potential displacement of residents. One of their key findings is that many of the challenges related to housing affordability are due to lower household incomes, and the need to prioritize local business development and supporting entrepreneurs in commercial districts. The report also begins by noting the impact of structural and institutional racism on neighborhoods and socioeconomic status of residents. Working to reverse the impact of these historical disparities requires a consistent focus on equitable growth policies, growing incomes and employment rates of existing city residents.

Community Engagement Feedback

In the Community Survey, question five asked respondents to indicate where the highest need for investment was in terms of economic opportunity. Employment Services (job training and placement) was rated as the highest need, with youth internship programs, and assistance for small businesses coming in (2) and (3) respectively. Focus group sessions also provided more context, including the need for better access to

transportation, wraparound services to support employment programs (soft skills, child care, mentoring), increased pay and benefits, and building off of past investments in commercial corridors.

What's Needed

- Employment, placement and job training programs/services that provide a livable wage and remove accessibility barriers.
- Financial education, wellness and counseling services.
- Continued investment in Business Improvement Districts (BIDs), Neighborhood Improvement Districts (NIDs) and other initiatives that support commercial corridors.
- Technical and financial assistance to businesses for job creation.
- Programs that foster entrepreneurship and small business growth, particularly for young people.
- Efforts that invest in and strengthen the regional transportation system, and improve workforce mobility.
- Homeownership and other wealth-building opportunities.
- Programs and services to address the economic impact of COVID-19 on city residents and small businesses, and support long-term recovery.

PUBLIC SAFETY, COMMUNITY ORGANIZING & CRIME PREVENTION:

Crime and/or perception of crime and neighborhood safety continues to be a dominant concern for residents. While the community survey did not ask about that specifically, safety was a strong theme in general feedback questions and focus groups. Issues such as crime prevention, reckless driving mitigation, and neighborhood improvement initiatives such as community organizers or neighborhood ambassadors were all mentioned frequently.

In 2017 the City of Milwaukee Health Department Office of Violence Prevention released the "Blueprint for Peace" - an action plan that addresses the root causes of violence with a public health approach intended to complement traditional criminal justice-based public safety strategies. The report states that 42% of respondents to the 2016 Community Health Survey rated violence as a top community health issue (p. 12). A number of strategies in the Blueprint for Peace are built around connecting residents to resources to meet basic needs, creating safe and accessible community spaces, organizing community events to foster neighborhood connections, and other community-building activities.

What's Needed

- Use of data-driven crime prevention strategies that utilize neighborhood networks, increase resident participation and improve police-community relationships.
- Maintain the Community Prosecution Unit (CPU) at the police district level to work with neighborhood organizers and residents.
- Support efforts to offer training and capacity-building opportunities for individuals and organizations to better understand violence prevention practices.
- Engage residents & groups in activities that promote neighborhood pride, improve quality of life, and connect them to resources (clean-ups, graffiti abatement, housing improvement, forums, etc.)

ENVIRONMENTAL & HEALTH ISSUES:

The City of Milwaukee has a few key areas that connect both environment and health to public service needs. For example, the 2019 Housing Affordability Report noted that over 42% of the housing in the City was built before 1940, is located in the central city, with much of it in need of repair. Substandard housing can have a detrimental impact on people's health, but the costs to maintain and update older properties can also be prohibitive. Additionally, the likelihood of these properties containing lead-based hazards is also higher.

Some parts of the City also experience larger impacts related to disaster and/or other environmental conditions. Increased access to public transportation can help reduce traffic congestion, increase walkability, and improve air quality. The CDC has found that public transportation systems are associated with reductions in several health risk factors such as motor vehicle crashes, air pollution, and physical inactivity [www.cdc.gov/policy/hst/hi5/publictransportation/index.html].

Long-term racial inequality also led Milwaukee County to declare racism as a public health crisis in May 2019, citing that the local government has a significant role to play in engaging all residents in racial justice work. The City of Milwaukee soon followed suit, with the Common Council passing a similar resolution in July 2019. Currently, the City of Milwaukee is seeing racial disparities play out in real-time as African Americans are three times as likely to die from COVID-19 than white residents.

What's Needed

- Address public health concerns (including factors related to COVID-19 and anti-violence programs).
- Inspect properties for environmental conditions that may pose hazards to residents.
- Coordinate/prepare CDBG planning reviews & Environmental Impact Assessments.
- Screen tax-delinquent properties to avoid environmental liability.
- Support disaster recovery efforts.
- Abate and/or prevent lead-based hazards
- Support increased access to, and investment in, public transportation.
- Support of community health centers, particularly to address the health impacts of COVID-19.

How were these needs determined?

Public Services needs were determined by community input via survey, focus groups and feedback from other stakeholders, review of recent City budgets, annual CDBG funding allocation plans, citywide plans, and local research related to community and economic development issues. [See Appendix for a Bibliography/Literature Review.] Public Service needs were also covered in the community survey in questions 1,3,4,8 and 12. Multiple focus groups were also held in specific topic areas and the community engagement team was present at 15+ community events to gain feedback. Additionally, the City convened a 30+ member Consolidated Plan Task Force who helped review the findings of the community input process, and provided feedback and evaluation throughout the drafting process via periodic meetings and interviews.

Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The following section is significantly excerpted from the City of Milwaukee Housing Affordability Report, which contains extensive research on the City's housing market conditions. It was produced by the City of Milwaukee Department of City Development and published in December 2019.

General Population Demographics

The City of Milwaukee's current population is estimated to be around 599,100. The median age in the City of Milwaukee is 31.3 years, which is lower than both Milwaukee County (34.6 years) and the larger metropolitan area (37.6 years).

The median ages of the City, county, and metropolitan area are all increasing, but the City is aging more slowly. In 2017, about 6.5% of the City's population was over 70 years old. The City currently has about 39,000 seniors that will either need to age in place or find appropriate housing. Individuals between the ages of 20 and 34, represent about 25% of the City's population (about 154,000 people).

The City of Milwaukee has about 230,500 households, of which 44% are White (Non-Hispanic), 38% are Black, 13% are Hispanic, and 3% are Asian. Native American and multi-racial households are slightly less than 1%. The metro Milwaukee area is considered very hyper-segregated. Currently, about 90% of metro area Black households and 67% of Hispanic households reside within the City of Milwaukee.

While the City's total population has been relatively stable since 2000, the dynamics have changed in two ways:

First, the percentage of the City's population that identifies as non-White has grown. While the White non-Hispanic population has been declining over the past few decades (primarily through out-migration or "white flight"), the increase in the Latino/Hispanic population has provided a counterbalance, resulting in flat overall population growth. Between 2000 and 2017 the Latino/Hispanic population grew by about 54% (38,000 people). The Black population has remained relatively unchanged in the same time period (less than 1% increase).

Second, while the City as a whole is among the most diverse in the nation by some measures, there are many neighborhoods that are highly segregated where more than 90% of residents are persons of color.

Household Income

The median household income in the City of Milwaukee is around \$38,000, which is significantly lower than surrounding communities. Conversely, poverty and unemployment rates are significantly higher in the City of Milwaukee than in the metro area, indicating that there is strong demand (and need) for affordable units as the City of Milwaukee is home to a high percentage of the region's low income households.

Key Comparative 2017 Income Indicators

	City of Milwaukee	Milwaukee County	Metro Milwaukee
Median Household Income (in 2017 dollars)	\$38,289	\$46,784	\$57,531
Median Per Capita Income (in 2017 dollars)	\$22,918	\$27,046	\$30,973
Percent Below Poverty Level	24.0%	18.3%	13.1%
Percent with Bachelor's Degree or Higher (B`5002)	23.8%	30.1%	34.5%
Unemployment Rate (Population 16 years and over)	9.0%	7.1%	5.5%

Data Source: City of Milwaukee Department of City Development. 2017 5 Year American Community Survey

The City of Milwaukee generally has a wide range of household incomes, indicating a need for a range of housing choices at various price points. In 2017, an estimated 39 percent of City households earned over \$50,000, and another 27% earned between \$25,000 and \$50,000. However, about 77,700 or 34% of City households earn less than \$25,000 in 2017; these households tend to spend a considerable portion of their annual incomes on housing, and generally have difficulty finding safe and decent housing in the private market.

2017 Household Income Range

		Less than \$25,000							000 to \$75,000 or 1,999 Greater		
		#	%	#	%	#	%	#	%	#	%
Cit	ty of Milwaukee	77.666	33.7%	28,808	12.5%	33,417	14.5%	39,870	17.3%	50,702	22.0%

Data Source: 2017 5 Year ACS, table S1901

Owner Occupancy Rates

About 36% of the estimated 250,000 housing units in the City of Milwaukee are owner occupied, with approximately 64.7% of single family and duplex homes being owner occupied. Owner occupancy rates vary significantly throughout the City, with lower owner occupancy rates (less than 40%) located in the near north side, and higher rates located towards the edges of the City.

Between 2007 and 2018, there was a significant decline in both the number and percentage of households that owned their own homes, a reduction of about 13,600 households or about 12%. This mirrors a trend nationally, and has resulted in a significant decline in owner occupancy across the City. The great recession and mortgage foreclosure crisis were contributing factors to this decline. City data analysis indicates that roughly two-thirds of properties that were foreclosed during the recession were owner occupied prior to foreclosure, while less than one-third of bank owned foreclosure sales were to owner occupants.

This was also documented in research done though the Marquette Law School's Milwaukee Area Project in 2019 that looked initially at the impact of the end of the City of Milwaukee's residency requirement and found evidence of the decline in owner occupied properties. This has resulted in two things: an increase in the number of landlords that are not city residents and a transfer of housing wealth to out-of-state investors

(Thousands of Milwaukee homes are no longer owned by city residents in a massive transfer of wealth since the *Great Recession*, Gousha & Johnson, Milwaukee Journal Sentinel, 1/30/20).

Property tax foreclosures continue to feed vacant properties into the City's real estate holdings. The Department of City Development, through the Strong Neighborhoods program, has made this inventory a particular focus. For example, since 2014 the City has sold over 3,000 city-owned properties, resulting in a reclamation of \$100 million in taxable income and adding to its capacity to fund critical services.

Structural Quality

The age of a housing unit is not an absolute predictor of housing quality. Milwaukee has many neighborhoods with very old housing which are attractive, safe, and well maintained. However, the age of a housing structure does signal likely code compliance problems, especially an increased likelihood of the presence of lead-based paint. For that reason a discussion of housing conditions begins with a look at the age of Milwaukee's housing stock:

Year Structure Built							
Total housing units	257,810	100.00%					
Built 2014 or later	408	0.20%					
Built 2010 to 2013	2,106	0.80%					
Built 2000 to 2009	8,887	3.40%					
Built 1990 to 1999	7,420	2.90%					
Built 1980 to 1989	9,835	3.80%					
Built 1970 to 1979	22,254	8.60%					
Built 1960 to 1969	26,977	10.50%					
Built 1950 to 1959	54,827	21.30%					
Built 1940 to 1949	27,055	10.50%					
Built 1939 or earlier	98,041	38.00%					

2018: ACS 1-Year Estimates Detailed Tables "Year Structure Built" Table B25034

The majority of the units built before 1940 are located in the central city. The majority of the units built between 1940 and 1959 are located in the northwest side and far south side of the City, while those built after 1959 tend to be located on the periphery of the City and most recently, newer structures developed in the central city and downtown and areas adjacent to downtown.

City Housing Programs

The 2020-2024 HUD Consolidated Plan benefits from a number of recent research reports that document city housing programs and market conditions in a comprehensive way. Additionally, the Department of City Development, Department of Neighborhood Services and Community Development Grants Administration have worked together over the years to streamline and better connect various housing initiatives that focus

on reducing vacancy and the impact of foreclosures, preserving and increasing homeownership, stabilizing neighborhoods, and improving housing quality.

Initiatives such as "10,000 Homes" (announced by Mayor Tom Barrett in 2018), Strong Neighborhoods program (established 2014-2015), Milwaukee Housing Trust Fund, etc. are all tools that the City uses to address a variety of housing needs. Additionally, the City's sustainability plan, "ReFresh Milwaukee" includes investment in housing as a priority strategy, noting the opportunity for energy-efficiency programs to renovate deteriorating housing stock.

The following reports in particular are excellent resources for recent analysis on the City of Milwaukee's housing market. [Links and full citations are included in the bibliography.]

- Laying the Foundation: An overview of City of Milwaukee affordable housing programs and priorities Wisconsin Policy Forum, July 2020.
- Home is Where our Health Is: Policies to Improve the Health of Renters in Milwaukee and Beyond Human Impact Partners and Community Advocates Public Policy Institute, February 2020.
- 2019 City of Milwaukee Housing Affordability Report Department of City Development, Planning Division, December 2019.
- Cost of Living: Milwaukee County's Rental Housing Trends and Challenges Wisconsin Public Policy Forum, August 2018.
- 10,000 Homes Initiative: A Ten-Year Plan to Improve Affordable Housing Opportunities in the City of Milwaukee City of Milwaukee, 2018.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

In December 2019 the City of Milwaukee Department of City Development published a Housing Affordability Report that provided detail and analysis of the City's housing inventory. In that report they noted that the City of Milwaukee has just under 250,000 housing units, 63% of which are single family or duplex buildings, 32% are in multifamily buildings, and the remaining 4% are condominium units. Additionally, at 27%, the City's percentage of two-family homes ranks among the highest percentages of duplex housing in the nation.

2019 Housing Inventory

Total Housing	143,632	249,920	100.0%
S	11,158	11,158	4.4%
Condominium			
Multi-Family	9,103	81,197	32.5%
Two-Family	34,194	68,388	27.4%
Single Family	89,177	89,177	35.7%
	Total Parcels	Number of Housing Units	Percent of Housing Stock

Source: 2019 MPROP (MPROP total parcels in 2019 is 160,209)

Below is additional data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	103,970	40%
1-unit, attached structure	17,665	7%
2-4 units	71,955	28%
5-19 units	25,675	10%
20 or more units	37,700	15%
Mobile Home, boat, RV, van, etc	980	0%
Total	257,945	100%

Table 31 - Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owne	ers	Renters		
	Number	%	Number	%	
No bedroom	385	0%	6,120	5%	
1 bedroom	3,065	3%	33,975	26%	
2 bedrooms	25,505	26%	56,095	42%	
3 or more bedrooms	68,645	70%	37,015	28%	
Total	97,600	99%	133,205	101%	

Table 32 - Unit Size by Tenure

Data Source: 2011-2015 ACS

Local data consultants Data You Can Use (DYCU) provided additional trends analysis on the changes in the types of residential properties since the previous Consolidated Plan (2015-2019). They found that:

- Overall there are no significant changes in the types of residential properties except for more (22%) 1-unit attached structure properties. There was a slight decrease in 2 to 4 unit properties (by 6%), and a slight increase in 5 to 19 unit and in 20+ unit properties (4% each).
- Additionally, no significant changes were found in the number of units by bedroom size, outside of those noted below:
 - Fewer 2 bedroom (-7%) and 3 or more bedroom owner properties (-10%)
 - More 2 and 3 bedroom 1-unit attached structure properties (+22%)
 - More rental properties 6% to 9% across all property types.

For detail view the DYCU Trends Analysis tables in the Appendix.

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to the 2019 Housing Affordability report, there are 239 properties with a total of 18,357 units reserved for low-income households (units subsidized through Site Based Section 8, Low Income Housing Tax Credits or LIHTC, and public housing programs). The Housing Authority of the City of Milwaukee (HACM) manages nearly 3,800 subsidized housing units, which includes just over 2,600 public housing units, 940 project-based voucher units, 165 units under low-income housing tax credits and 26 market rate units.

HACM has approximately an additional 5,800 units under contract for the portable Housing Choice Voucher program (Section 8). In general, a family's income may not exceed 50% of the area median income (AMI) to participate in the Housing Choice Voucher program, and by law, the housing authority must provide 75% of its vouchers to applicants whose

Wisconsin Housing and Economic Development Authority (WHEDA) funds and monitors low income housing tax credit (LIHTC) projects through bond financing. This is a very competitive annual, statewide process but can result in the addition of affordable units. For example, in January of 2020 the City of Milwaukee received funds to support five projects which will rehab or build 426 apartments for low-income residents. To date, there are about 2,500 LIHTC units that are expiring within the next ten years, a focus for preservation efforts.

Data in the following table was provided by the Housing Authority of the City of Milwaukee (HACM) in December 2019.

Development	Total #	# of public housing units	# of project- based voucher units	# of low-income housing tax credit (LIHTC) only units	# of market rate units	Population served
Arlington Court	230	230	0	0	0	180 units designated for seniors and 50 for seniors and/or persons with disabilities.
Becher Court	120	120	0	0	0	Designated for seniors.
Cherry Court	120	0	120	0	0	Designated for seniors and/or persons with disabilities. All units are also LIHTC units.
College Court	251	251	0	0	0	125 units are designated for seniors and 126 are designated for seniors and/or persons with disabilities.
Convent Hill	80	0	42	38	0	Designated for seniors. All units are also LIHTC units.
Highland Gardens	114	0	80	34	0	Designated for seniors and/or persons with disabilities. All units are also LIHTC units.
Holton Terrace	120	0	120	0	0	Designated for seniors and/or persons with disabilities. 100 of the units are also LIHTC units.
Lapham Park	201	0	201	0	0	Designated for seniors. All units are also LIHTC units.
Lincoln Court	110	110	0	0	0	Designated for seniors and/or persons with disabilities.
Locust Court	230	230	0	0	0	Designated for seniors and/or persons with disabilities.
Merrill Park	120	120	0	0	0	Designated for seniors and/or persons with disabilities.
Mitchell Court	100	100	0	0	0	Designated for seniors and/or persons with disabilities.
Olga Village	37	0	37	0	0	Designated for seniors. All units are also LIHTC units.
Riverview	180	180	0	0	0	Designated for seniors and/or persons with disabilities.
Townhomes at Carver Park	122	51	0	51	20	Family housing.
Highland Homes	56	56	0	0	0	Family housing.

Hillside Terrace	470	470	0	0	0	Family housing.
Parklawn	380	380	0	0	0	Family housing.
Westlawn Gardens	250	0	230	20	0	47 units designated for seniors. The rest of the units are designated for family households.
Westlawn Gardens Scattered Sites	30	0	18	12	0	Family housing.
Victory Manor (Westlawn)	60	0	44	10	6	Veterans preference housing.
Scattered Sites South (688)	64	64	0	0	0	Family housing.
Scattered Sites North and West (691)	143	143	0	0	0	Family housing.
Scattered Sites Milwaukee (694)	57	57	0	0	0	Family housing.
Cherry Court HOPE VI Scattered Sites (693)	69	69	0	0	0	Family housing.
Scattered Sites Tax Credit I (698)	24	0	24	0	0	Family housing. All units are also LIHTC units.
Scattered Sites Tax Credit II (675)	24	0	24	0	0	Family housing. All units are also LIHTC units.
Total	3762	2631	940	165	26	

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There are no expiring Section 8 contracts for 2020. Currently the Housing Authority of Milwaukee (HACM) manages over 5,500 active housing choice vouchers.

Due to declining federal funding for public housing, the Housing Authority of the City of Milwaukee (HACM) is continuing its redevelopment efforts, including using tools to reposition public housing such as the HUD's Rental Assistance Demonstration (RAD) program, as well as looking at the potential of other repositioning tools such as the Section 18 disposition program and Section 32 homeownership program.

Through the RAD program, HACM has already transformed public housing units in 11 housing developments into project-based voucher units on a 1-for-1 basis, thus sustaining subsidized housing for the future. These developments include: Cherry Court, Highland Gardens, Convent Hill, Lapham Park, Olga Village, Westlawn Gardens, Scattered Sites Tax Credit I, Scattered Sites Tax Credit II, Westlawn Gardens Scattered Sites, Victory Manor, and Holton Terrace.

This transformation has allowed redevelopment and physical improvements at various housing developments, while retaining the housing subsidy through the project-based voucher program and retaining rights for existing residents such as the right to remain or return after redevelopment.

During the redevelopment of large developments such as Westlawn, there may be temporary reductions in subsidized housing until all phases have been completed. For example, in the 2015-19 Consolidated Plan, there were 3,451 public housing units and 332 project-based voucher units, or 3,783 total units. In the 2020-24 Consolidated Plan, there are 2,631 public housing units and 940 project-based voucher units, or 3,571 total units.

This net decrease of 212 units is primarily due to the demolition of the western side of Westlawn and the fact that the redevelopment will take place over several years through 2022 and only two phases have been completed. Westlawn residents have not lost subsidized housing as they were offered assistance with relocation to other public housing or use of a tenant protection rent assistance voucher until replacement units have been built.

Does the availability of housing units meet the needs of the population?

Housing concerns (particularly around housing and health) have been a significant concern for the City of Milwaukee for a number of years. As described frequently in this Consolidated Plan, a number of recent reports have documented the current challenges and market environment (see bibliography for details). The availability of housing units does not meet the needs of Milwaukee's population in the following ways:

1. **Need for additional affordable housing:** Several years ago the Southeastern Wisconsin Regional Planning Commission (SEWRPC) completed the "Regional Housing Plan: 2035" which showed that there is a significant shortage of affordable housing in the metropolitan area. There are only 46,000 subsidized housing units in Southeastern Wisconsin, compared to a need of about 187,000 households.

Thus, there can be long waiting lists for subsidized housing. The Housing Authority of Milwaukee (HACM) last opened its rent assistance voucher waiting list in 2015 and took in over 35,000 applications in ten days. When the public housing family wait list was last opened in 2017, over 8,400 households applied in two months. Over time, some drop out of the program for various reasons, so the waiting list needs to be updated periodically. In 2020 HACM held a "random lottery" to select 3,000 households to be added to the waiting list.

Many people are spending a significant amount of their income on housing costs, which also bears out in the needs assessment data collected around housing cost burden and described earlier in this plan. In the southeastern Wisconsin region, 282,500 or 36% of Region households spend more than 30% of their income on housing, with many spending 50% or more. Two-thirds of these households are below the median household income of \$53,879.

This has resulted in an increasing concern by both local government and housing professionals on the availability of affordable housing in Milwaukee. For example, in 2018, Mayor Tom Barrett pledged to improve affordable housing opportunities for 10,000 households in the City over ten years (the "10,000 Homes" initiative), and includes projects related to single-family home rehabilitation to larger, multi-unit housing construction.

2. **Need for additional accessible housing for persons with disabilities and seniors:** The SEWRPC study also showed that the demand for accessible housing exceeds, and will continue to exceed, the supply. Also, this is documented in the needs assessment section on special needs, as well as the City's 2019

Housing Affordability report. Accessible housing is a significant concern, since the average household income for persons with disabilities is half that of others, on average.

- 3. **Need for supportive housing or housing with services:** There is a continuing need for affordable and safe permanent housing units, and units with supportive services for those who are homeless, or who are persons with physical, mental health or developmental disabilities. Access to services, along with subsidized rent programs, leads to longer-term successful outcomes around housing stability.
- 4. **Need for housing for larger families with children:** Larger families (3 or more bedrooms) have a more difficult time finding quality affordable housing as documented in the 2019 Housing Affordability Report, as well as feedback from service providers. Thus, there is a need for some larger housing units (3-5 bedrooms).

Describe the need for specific types of housing:

As described above, there is a significant need for more affordable housing for low-income households; more accessible housing for seniors and persons with disabilities; more supportive housing; and more units for families (3-5 bedrooms).

In addition to the need for quality affordable rental housing, there is also a market opportunity for quality affordable modest single-family homes for first-time homebuyers. Many first-time homebuyers have a difficult time navigating the current market, which includes tight inventory and availability of programs such as down payment assessment and credit programs targeted for low- to moderate-income buyers.

Additionally, the most immediate needs of residents of public housing and Housing Choice Voucher holders include:

- 1. Assistance with economic self-sufficiency and employment. This is partially caused by an imbalance between the location of affordable housing, location of jobs and employment centers in the Milwaukee metro area, and the need for transportation options.
- 2. The need for assistance with, and coordination of, supportive services needed by seniors and persons with disabilities to continue living independently.
- 3. The need in public housing (and especially for Housing Choice Voucher holders) for 3, 4, and 5 bedroom units that are decent, safe, sanitary, and affordable, including units accessible for people with disabilities.

Lastly, the HUD Consolidated Planning community input process included feedback from both residents and housing professionals that they are interested in exploring non-traditional, creative approaches to develop more safe, affordable housing in the City. This would include new types and styles of housing that could support age-in-place or non-traditional family structures, rent-to-own or cooperative ownership models, and improve the safety and quality of Milwaukee's older housing stock.

Discussion

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Below is data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	138,300	118,200	(15%)
Median Contract Rent	585	648	11%

Table 33 - Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-205 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	27,450	20.6%
\$500-999	93,090	69.9%
\$1,000-1,499	9,235	6.9%
\$1,500-1,999	2,180	1.6%
\$2,000 or more	1,245	0.9%
Total	133,200	100.0%

Table 34 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	10,115	No Data
50% HAMFI	55,235	16,255
80% HAMFI	102,590	39,570
100% HAMFI	No Data	52,195
Total	167,940	108,020

Table 35 - Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	611	742	911	1,152	1,298
High HOME Rent	611	742	911	1,152	1,298
Low HOME Rent	611	725	870	1,005	1,121

Table 36 - Monthly Rent

Data Source: HUD FMR and HOME Rents

Local data consultants Data You Can Use (DYCU) provided additional trends analysis on housing cost trends since the previous Consolidated Plan (2015-2019). They found that the median home value has dropped by 16% from \$140,000 in 2010 to \$118,000 in 2015 and the median contract rent has increased by 8% from \$600 in 2010 to \$648 in 2015. Additional detail on this analysis is included in the Appendix.

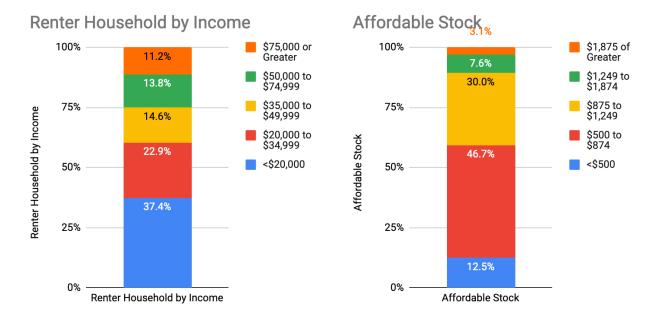
The City of Milwaukee's 2019 Affordability Report includes significant analysis on the cost of housing relative to the county, noting the City has an a number of housing units at a wide range of price points, as well as a large percentage of units that meet the definition of "naturally occurring affordable housing" for households at 60% AMI or below.

Is there sufficient housing for households at all income levels?

The economic impact of the Great Recession and mortgage foreclosure crisis has had a significant, detrimental, and an ongoing effect on city households. While assessed housing values throughout the City overall have recovered from the Great Recession, the recovery has not been even across city neighborhoods, and about 1/3 of homes continue to see declining values. Since 2010, the neighborhoods experiencing the greatest declines in assessed values (greater than 50%) are also those experiencing the negative effects of concentrated poverty, low household incomes, population decline, and low/declining homeownership rates. So while the cost of housing may seem comparatively low in many Milwaukee neighborhoods, real household incomes and the ability to pay for housing have been declining this decade when controlling for inflation.

Additionally, the City has seen a net decrease in owner occupied households of more than 15,000 households since 2010, increasing pressure on the rental market for quality affordable housing. While the City of Milwaukee currently has an adequate supply of housing (250,000 units) to accommodate all Milwaukee households (230,500), housing that is affordable and does not result in cost burden is out of reach for many Milwaukee households.

This shortage of affordable units is most dramatic for low-income households. As described in the 2019 Housing Affordability report, there are currently about 37,000 Milwaukee households that earn less than \$20,000 per year and pay more than half of their income on housing. To avoid a housing cost burden, these households would at most be able to afford a unit at \$500 or less per month. 2017 rental supply data indicated a deficit of about 33,400 units to meet the household need.



Source: City of Milwaukee 2019 Housing Affordability Report

How is the affordability of housing likely to change considering changes to home values and/or rents?

Affordability of housing is a growing problem. As documented earlier in Needs Assessment sections NA 10-25, the number of households that experience housing cost burden has increased since the last Consolidated Plan process. Data You Can Use (DYCU) provided additional trends analysis on housing stock trends since the previous Consolidated Plan (2015-2019), finding that there was an increase in additional rental units between 2011-2015, with slight increases in the number of units for renter households at the 30-50% Area Median Income (AMI) range, but an increase in units available to households at the 50-80% AMI range.

DYCU also looked at the affordability of housing stock for owners. Again, there was an overall increase in owner units from the last consolidated planning period, with a small gain in units for households at 30-50% AMI and 50-80% AMI, but a slight decrease in units available for households at the 80-100% AMI. Additional detail from DYCU is included in the Appendix.

The decrease in owner occupied households since the Great Recession continues to have an impact, by increasing the number of renters in the market along with a potential increase in rental rates. Although Milwaukee has relatively affordable rents and a moderate vacancy rate of 10.6%, both household and per capita incomes in the City are significantly lower than surrounding communities, impacting affordability. The shortage of affordable units is more significant for low-income households.

The recovery in home value has varied across the City, and areas with some of the oldest housing stock coincide with areas that have lower owner occupancy and higher poverty rates. While a household making the City median income is able to afford the median priced home in the City, owners do need to earn \$40,000-\$80,000 per year to avoid being cost-burdened (p. 23 City of Milwaukee 2019 Housing Affordability

Report). While mortgage loan interest rates continue to remain near historical lows, lack of down payment savings, access to credit, and amount of household debt are all key barriers to accessing mortgage credit.

Recent trends also show a decrease in owner-occupancy accompanied with an increase of investor-owners. The popularity of houses owned by limited liability companies (LLCs) has drastically increased, is concentrated in single-family homes and duplexes, and quadrupled from 2005 to 2019. The number of landlords residing outside the City has also greatly increased. Half of all rented properties are now owned by someone outside Milwaukee. From 2005 to 2019, the holdings of suburban landlords grew 70%, from nearly 7,700 properties to more than 13,000. During that same period, residential properties owned by someone who lives in Wisconsin but not in the suburbs grew from just under 1,000 to nearly 2,300. Landlords with addresses outside Wisconsin quadrupled their holdings over the last 15 years from 1,300 properties to more than 5,800. [Thousands of Milwaukee homes are no longer owned by city residents in a massive transfer of wealth since the Great Recession, Gousha & Johnson, Milwaukee Journal Sentinel, 1/30/20].

Additionally, the City is also keeping a close eye on potential displacement in neighborhoods surrounding downtown which has seen increased development. The Department of City Development's 2018 report, "A Place in the Neighborhood: An Anti-Displacement Plan for Neighborhoods Surrounding Downtown Milwaukee" outlines a series of strategies focused on creating and preserving affordable housing in areas that have rising housing costs.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The following are estimates of median rents from the 2018 American Community Survey:

- 1 bedroom units: about \$670 per month
- 2 bedrooms: about \$826 per month
- 3 bedrooms: about \$979 per month

The 2019 HOME rents / Fair Market Rent (FMR) rates from HUD for Milwaukee-Waukesha-West Allis are \$753 for a 1 bedroom, \$918 for a 2 bedroom, and \$1,167 for a 3 bedroom. The HOME rents are a bit higher than estimated median rents for the City of Milwaukee, but may reflect rates for communities surrounding the City. [Source: https://www.huduser.gov/portal/datasets/fmr.html#2019]

Data You Can Use (DYCU) provided additional trends analysis on changes in rent paid since the previous Consolidated Plan (2015-2019). They found that overall, there is an increasing trend in rents paid with fewer low, and more moderate to middle level rents. Specifically, a 9% decrease in the number of rents paid under \$500; a 6% increase in the number of rents between \$500 and \$1,000; and a slight 3% increase in the number of rents paid over \$1,000. Additionally, DYCU found that the FMR has increased over time, particularly for efficiency, 1-2 bedroom and 4-bedroom units. Both the low and high HOME rents have also increased across all unit numbers of bedroom categories. Additional detail from DYCU is included in the Appendix.

While the costs of housing seem comparatively low in many areas of Milwaukee, real household incomes and the ability to pay for housing have been declining over time when controlling for inflation. Additionally, the economic impacts of COVID-19 on household income have had a disproportionate impact on low-income households and communities of color, which will exacerbate existing disparities in accessing safe, affordable housing. Until household incomes start to rise and the poverty rate begins to decrease, affordability will continue to be a challenge for many households.

There is general consensus among affordable housing experts that to address the housing needs of very low income households (the largest group of households without access to affordable housing in Milwaukee), raising household incomes or providing a voucher type support or public housing option may be the only way to adequately address their housing needs. The amount of resources required to meet the needs of this group is immense and likely beyond the scope of local government to do at a meaningful scale.

Discussion

MA-20 Housing Market Analysis: Condition of Housing - 91.210(a)

Introduction

Below is data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS.

Definitions

Condition of Units

Condition of Units	Owner-	Occupied	Renter	-Occupied
	Number	%	Number	%
With one selected Condition	31,995	33%	68,600	52%
With two selected Conditions	880	1%	4,475	3%
With three selected Conditions	50	0%	465	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	64,680	66%	59,660	45%
Total	97,605	100%	133,200	100%

Table 37 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-0	Occupied	Renter-Occupied		
	Number	%	Number	%	
2000 or later	3,815	4%	6,045	5%	
1980-1999	4,345	4%	11,475	9%	
1950-1979	43,725	45%	51,080	38%	
Before 1950	45,720	47%	64,600	49%	
Total	97,605	100%	133,200	101%	

Table 38 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-C	ccupied	Renter-Occupied		
	Number	%	Number	%	
Total Number of Units Built Before 1980	85,755	89%	119,127	89%	
Housing Units built before 1980 with children present	24,106	25%	40,713	30%	

Table 39 - Risk of Lead-Based Paint

Data Source: Provided by the Department of City Development. 2011-2015 ACS (Total Units); 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation[1]	Total
Vacant Units [1]	3,516	193	3,709
Abandoned Vacant Units [2]	584	31	615
REO Properties	252	0	252
Abandoned REO Properties [3]	15	0	0

Table 40 - Vacant Units

Data Source: Department of City Development

NOTES:

[1]Units or properties that have current raze orders filed.

[2]This is a subset of all vacant units, identified as tax delinquent for at least 1 year. This excludes all properties that were only tax delinquent in 2019.

[3]This is a subset of all identified REOs, that were identified as tax delinquent for at least 1 year. This excludes all properties that were only tax delinquent in 2019. REOs are identified strictly as bank owned foreclosures. In addition to the REOs, the City owns an additional 680 in rem residential properties, acquired primarily through the foreclosure process: most (721) are single family and duplex properties. In total, about 381 residential properties currently have raze orders; most (377) are also single family or duplexes.

Need for Owner and Rental Rehabilitation

Again, while the age of a housing unit is not an absolute predictor of housing quality, it can signal likely code compliance problems, especially an increased likelihood of the presence of lead-based paint. Out of all of its housing programs, the City of Milwaukee invests a significant portion towards programs that assist owners with home maintenance needs as noted in the July 2020 Wisconsin Policy Forum report "Laying the Foundation: An overview of City of Milwaukee affordable housing programs and priorities."

The need for home maintenance and repair resources in Milwaukee has increased since the Great Recession, when declining home values meant a loss of equity and a decreased ability to access credit for critical home repairs. The 2019 Housing Affordability Report found that 31% of homeowners in the City have high monthly costs, paying 30% of their income on housing (table 4, p.9). For these homeowners, this leaves little room for financial resources for home maintenance costs.

Aging housing stock and the risk of lead-based paint hazards are strongly connected to the physical health of residents. Community Advocates Public Policy Institute released a report in February 2020 that noted that the average age of rental housing in the City of Milwaukee is 68 years, making it some of the oldest in the state ("Home is Where our Health Is: Policies to Improve the Health of Renters in Milwaukee and Beyond" p. 40).

Data You Can Use (DYCU) provided additional trends analysis on changes in both owner and rental properties since the previous Consolidated Plan (2015-2019). They looked at properties with 1 or more housing conditions, finding very little change, with just over 50% of renter-occupied units with 1 housing condition in both time periods. Additionally, the number of owner and renter occupied properties built before 1980 has remained stable during that time period. However, they did find a shift in ownership patterns, with 10,170

fewer owner-occupied properties and 7,022 more renter-occupied properties, which was also discussed previously in this section. Additional detail from DYCU is included in the Appendix.

On the purchase side, the programs such as the Strong Neighborhoods Homebuyer Assistance and Rental Rehabilitation that assist people in acquiring and rehab units with the goal of preservation speak to the ongoing need for programs that focus on the challenges of having predominantly older housing stock.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

HUD requires property owners to disclose the presence of lead-based paint before renting any housing that was built before 1978. As described earlier in this section, over 80% (around 229,000) of the housing units in the City were built before 1980, which indicates the potential for lead-based paint hazards in a significant number of city housing units. About half of that number (54%) were built before 1950. The Community Advocates healthy housing report also notes that Milwaukee's lead exposure risk is among the highest in the nation and disproportionately affects low-income neighborhoods, estimating there are likely over 120,000 housing units that could have lead-based paint hazards based on the age of Milwaukee's housing stock (p. 42).

Additionally, the Milwaukee Health Department utilizes data from Wisconsin on the number of children enrolled in Medicaid for their outreach on lead-based hazard testing. It is estimated that 85% of the children in the Milwaukee area under 72 months are enrolled in Medicaid. The City of Milwaukee Health Department continues to secure HUD funding specifically to address lead-based paint hazards. Lastly, COVID-19 has also impacted the City's ability to test children for lead exposure, with testing rates down by an average of about 33% due to the pandemic and public health restrictions.

Discussion

MA-25 Public and Assisted Housing - 91.210(b)

Introduction

The Housing Authority of Milwaukee (HACM) is a national leader in public housing, and has consistently provided safe, affordable housing to Milwaukee families, seniors, and disabled adults for over 70 years.

Totals Number of Units

	Program Type								
	Certif	Mod-	Public			V	ouchers/		
	icate	Rehab	Housing	Total	Project	Tenant	Special P	urpose Vouc	her
					-based	-based	Veterans Affairs Supportive Housing	Family Unificati on Program	Disa bled *
# of units									
vouchers									
available	0	0	3,599	5,945	144	5,801	939	335	706
# of accessible									
units			1,495						

Table 41 - Total Number of Units by Program Type

Describe the supply of public housing developments:

The Housing Authority of the City of Milwaukee (HACM) manages nearly 3,800 subsidized housing units, which includes just over 2,600 public housing units, 940 project-based voucher units, 165 units under low-income housing tax credits and 26 market rate units. The specific developments of Northlawn, Southlawn, and Berryland contain another 977 units of unsubsidized affordable housing that are rented at 90% of market rents. In addition, the Housing Authority's Housing Choice Voucher program has nearly 5,800 Section 8 Housing Choice vouchers under contract at this time.

Below is a summary of the public housing and low-income housing tax credit developments managed by HACM.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

All of the public housing developments listed below were included in HACM's Agency Plan and approved by HUD.

^{*}includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition Data Source: PIC (PIH Information Center)

Development	Total # of Units	# of public housing units	# of project- based voucher units	# of low-income housing tax credit (LIHTC) only units	# of market rate units	Population served
Arlington Court	230	230				180 units designated for seniors and 50 for seniors and/or persons with disabilities.
Becher Court	120	120				Designated for seniors.
Cherry Court	120		120			Designated for seniors and/or persons with disabilities. All units are also LIHTC units.
College Court	251	251				125 units are designated for seniors and 126 are designated for seniors and/or persons with disabilities.
Convent Hill	80		42	38		Designated for seniors. All units are also LIHTC units.
Highland Gardens	114		80	34		Designated for seniors and/or persons with disabilities. All units are also LIHTC units.
Holton Terrace	120		120			Designated for seniors and/or persons with disabilities. 100 of the units are also LIHTC units.
Lapham Park	201		201			Designated for seniors. All units are also LIHTC units.
Lincoln Court	110	110				Designated for seniors and/or persons with disabilities.
Locust Court	230	230				Designated for seniors and/or persons with disabilities.
Merrill Park	120	120				Designated for seniors and/or persons with disabilities.
Mitchell Court	100	100				Designated for seniors and/or persons with disabilities.
Olga Village	37		37			Designated for seniors. All units are also LIHTC units.

Riverview	180	180				Designated for seniors and/or persons with disabilities.
Townhomes at Carver Park	122	51		51	20	Family housing.
Highland Homes	56	56				Family housing.
Hillside Terrace	470	470				Family housing.
Parklawn	380	380				Family housing.
Westlawn Gardens	250		230	20		47 units designated for seniors. The rest of the units are designated for family households.
Westlawn Gardens Scattered Sites	30		18	12		Family housing.
Victory Manor (Westlawn)	60		44	10	6	Veterans preference housing.
Scattered Sites South (688)	64	64				Family housing.
Scattered Sites North and West (691)	143	143				Family housing.
Scattered Sites Milwaukee (694)	57	57				Family housing.
Cherry Court HOPE VI Scattered Sites (693)	69	69				Family housing.
Scattered Sites Tax Credit I (698)	24		24			Family housing. All units are also LIHTC units.
Scattered Sites Tax Credit II (675)	24		24			Family housing. All units are also LIHTC units.
Total	3762	2631	940	165	26	

Public Housing Condition Report

HACM contracts with Friends of Housing, a 501(c)(3) nonprofit to manage a large number of its public housing developments. HUD hires third party inspectors to assess the physical condition of public housing units; the most recent results of these physical inspection scores are provided below.

Public Housing Development	2018 Inspection (max of 100 points)
Arlington Court	Not required (2017 = 90)
Becher Court	76
Cherry Court	Not required (RAD)
College Court	55
Highland Gardens	Not required (RAD)
Holton Terrace	89
Lapham Park	Not required (RAD)

Lincoln Court	81
Locust Court	48
Merrill Park	93
Mitchell Court	95
Olga Village	Not required (RAD)
Riverview	73
Townhomes at Carver Park	52
Highland Homes	35
Hillside Terrace	42
Parklawn	37
Westlawn Gardens	Not required (RAD)
Westlawn Gardens Scattered Sites	Not required (RAD)
Victory Manor (Westlawn)	Not required (RAD)
Scattered Sites South (688)	42
Scattered Sites North & West (691)	35
Scattered Sites Milwaukee (694)	42
Cherry Court HOPE VI Scattered Sites	39
(693)	
Scattered Sites Tax Credit I (698)	Not required (RAD)
Scattered Sites Tax Credit II (675)	Not required (RAD)

Table 42 - Public Housing Condition

Data Source: Housing Authority of the City of Milwaukee

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Recent physical inspection scores and the physical needs assessments support the fact that the Housing Authority of the City of Milwaukee (HACM) faces \$198 million in deferred non-emergency capital repairs/maintenance for its public housing inventory. HACM has chosen to utilize a variety of tools including the Rental Assistance Demonstration (RAD) program and Section 18 disposition that HUD has provided to access funding to address the capital needs and to sustain public housing for the future.

RAD was created in 2012 in order to give public housing authorities (PHAs) a powerful tool to preserve and improve public housing properties and address the \$35 billion dollar nationwide backlog of deferred maintenance. RAD allows for public housing units to convert to project-based voucher units, maintaining subsidy while stabilizing revenue.

- RAD allows public housing agencies to leverage public and private debt and equity in order to reinvest in the public housing stock. This is critical given the backlog of public housing capital needs.
- In RAD, units move to a Section 8 platform with a long-term contract that, by law, must be renewed in perpetuity. A Use Agreement is also recorded under RAD further enforcing HUD's long-term interest. This ensures that the units remain permanently affordable to low-income households.
- Residents benefit from a right of return, a prohibition against re-screening, and robust notification and relocation rights. Residents continue to pay 30% of their adjusted income towards the rent, maintain the same basic rights as they possess in the public housing program, and gain a new option to request tenant-based assistance if they wish to subsequently move from the property.

- RAD maintains the ongoing public stewardship of the converted property through clear rules requiring ongoing ownership or control by a public or non-profit entity.
- RAD is highly cost-effective, relying on shifting existing levels of public housing funds to the Section 8 accounts as properties convert.
- RAD also enhances housing options for existing residents by providing a choice mobility option after one year of living in a RAD project-based voucher unit.

Describe the public housing agency's strategy for improving the living environment of lowand moderate-income families residing in public housing:

The Housing Authority of the City of Milwaukee (HACM) will address the physical condition of its public housing developments over the next five to ten years by utilizing the tools that HUD has created (Rental Assistance Demonstration or RAD; Section 18 Disposition, Choice Neighborhoods, etc.) as well as mixed finance developments through pursuit of low-income housing tax credits (LIHTC) and other financing options.

Additionally, green building and sustainable development approaches can bring new resources to improve public housing units. HACM has been a national leader in this area, steadily increasing its commitment to environmental sustainability through a number of techniques including deconstruction and recycling of demolished building materials; use of Energy Star appliances; ground source heating/cooling; upgraded weatherization in older buildings and construction techniques that increase energy-efficiency in new homes and multifamily buildings; use of sustainable materials such as bamboo, stained concrete flooring and recycled materials; the reduction of storm-water run-off through rain gardens, green roofs and bio-swales; and use of solar power.

Other strategies that HACM is using to improve the living environment of low-income and moderate-income families living in public housing include:

- Continue to explore and expand partnerships with nonprofits and other agencies that provide quality services for public housing residents and other community residents, such as youth-serving agencies, community centers, early childhood centers, schools, health clinics, etc.
- Continue partnerships with agencies that provide or coordinate supportive services necessary to sustain independent living for seniors and persons with disabilities living in public housing and explore funding opportunities to sustain such services.
- Continue and expand efforts to improve the economic self-sufficiency and employment of public housing residents, including job search assistance, linkages to job training, transportation, child care and other supportive services to overcome barriers to employment.
- Continue and expand efforts to improve the educational attainment of children living in public housing. This includes strategies to ensure children attend school regularly, do not drop out of school and graduate from high school. Strategies include linkages to supportive services and after-school programs, parental involvement, and crisis intervention.

- Continue to offer financial literacy education linked with asset-building strategies such as Individual Development Accounts (IDAs) or Family Self Sufficiency (FSS) escrow accounts for both public housing residents and Housing Choice Voucher participants.
- Continue efforts to transition families from public housing and/or rent assistance to homeownership through our economic self-sufficiency, asset-building, and homebuyer counseling programs.

Discussion:

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The following section contains information provided by the Milwaukee Continuum of Care (CoC) service providers, the Homeless Management Information System (HMIS), and publicly-held data sources. The CoC is the entity responsible for coordinating Milwaukee's annual permanent supportive housing program application also known as the Continuum of Care Program Grant to HUD, and for planning, organizing, and evaluating the continuum of services for individuals and families experiencing homelessness.

Facilities and Housing Targeted to Homeless Households

	Emergency S	helter Beds	Transitional Housing Beds		nt Supportive ing Beds
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	261		45	258	
Households with Only Adults	410	57	104	1425	
Chronically Homeless Households				510	
Veterans			75	539	
Unaccompanied Youth	28 (under 18)		17 (18-24)		

Table 43 - Facilities and Housing Targeted to Homeless Households

Data Source: Milwaukee CoC, December 2019

NOTE: No additional emergency shelter capacity is required or planned. While emergency shelter and transitional housing are resources for individuals and families in greatest need who have no other housing option in the community, the Milwaukee CoC focuses on creating access to more permanent housing so individuals experiencing homelessness can be transitioned more quickly out of shelters, which allows the current number of shelter beds to serve more people.

Reallocation of a minimum of two CoC-funded transitional housing projects (40 beds) to permanent supportive housing for chronically homeless individuals and families is planned by 2021 with additional reallocations to follow to respond to the permanent housing needs of special populations. Special populations will continue to receive emergency shelter and transitional housing services tailored to their unique needs. Included in this category are veterans, veterans' families, domestic violence victims, individuals with HIV/AIDS, and unaccompanied youth.

Additionally, in response to COVID-19 and with emergency funds provided by the federal and state governments, shelter capacity was expanded rapidly to accommodate social distancing requirements. This emergency effort warrants further examination as a potential long-term response to addressing homelessness.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

While the traditional components of the homeless services system are working, feedback from CoC providers indicates that there is variability in the nature and level of services provided beyond shelter/housing and the sustainability of permanent supportive housing services is jeopardized by a lack of consistent funding support.

Case management is central to the ability of homeless clients to identify their needs and access the services and benefits that will address those needs. All homeless service providers utilize some level of case management in their work with clients. Case management alone, however, is not sufficient to address many of the serious needs presented by homeless clients. Case managers must be able to access the resources of mainstream institutions such as the workforce development system or the behavioral health system or develop strategies to provide similar services in-house. Below is a summary of the key points of feedback from providers in specific areas of mainstream services.

Mental Health: Milwaukee County mainly provides mental health services for this population. These include Comprehensive Community Services (CCS), Community Support Programs (CSP), and Targeted Case Management (TCM). There is very little available to assist adults in families with mental health needs, especially if they do not have someone that can care for their children. Access to affordable health care is less than adequate, and access to psychiatry and other mental health resources are limited. The integration of mental health and homeless service systems is very poor. CCS is a good Medicaid Waiver program that gives recovery-focused individuals access to a vast array of supportive services, but does require people to participate in a mental health recovery plan, which can be a barrier for those who are not able to agree to that requirement (but still need the supportive services).

Employment Services: Many traditional employment services are difficult for those experiencing homelessness to access, and these services have not been the best fit for this population even when they are able to access them. Many families are accessing employment services through W-2, but they do not end up employed. Working with entities that provide services beyond job placement (such as coaching) has been more successful. Additionally, employment agencies that have strong relationships with employers have had more successful placements. Employment agencies such as Goodwill and EasterSeals have seen more success when developing strong partnerships with agencies that serve this population. With the implementation of Coordinated Entry, agencies have seen an increase in clients with high needs, especially in terms of disabilities, and for whom SSI/SSDI would be more appropriate than employment.

<u>Housing</u>: Also, individuals can sometimes be placed in mainstream subsidized housing including properties belonging to the Housing Authority of the City of Milwaukee (HACM) and privately held affordable housing units. This is a rarity, however, because of eligibility requirements and long waiting lists. For people receiving SSI/SSDI, a payee case manager is often the best way to ensure that they remain securely housed.

Strengths in the current system include:

• The use of Coordinated Entry to prioritize individuals and families in greatest need into shelter.

- The continued gradual shift of resources and investment towards prevention or early intervention programs, and rapid re-housing to reduce reliance on emergency shelter.
- Increased capacity to implement the Housing First model, which focuses on getting a person/family stably housed, then access to guided supportive services.
- Sustained collaboration among CoC service providers as they address different areas of need such as serving populations with emerging risk for homelessness, eviction prevention, etc.
- Increased capacity to build new permanent supportive housing, including units for specific groups such as veterans, youth aging out of foster care, victims of trafficking or exploitation, etc.

Gaps in the current system include:

- Stronger connections at a service provider level to mainstream service systems, particularly health care, mental health, and employment services.
- Better integration with institutions such as physical and mental health care providers, correctional institutions/jails, community-based transitional housing facilities, etc. for connection to both emergency and permanent housing.
- Resources to support additional Housing Navigators to expand homelessness prevention and rapid re-housing program access, including "transitional" case management services to ensure clients remain stably housed past six months.
- Supportive services and/or case management for participants in public housing programs.
- A lack of protective payee services that also provide case management assistance.
- Services (health care and otherwise) for senior clients that are experiencing dementia or early Alzheimer's.
- Disconnection between the broader group of veterans-serving organizations and the homeless services system (mainly as they do not seek or receive HUD-based support).

Overwhelmingly, agencies are finding that specialized case management within the CoC is necessary to make gaining income a success. There are currently no dedicated dollars to this within the CoC, and a recent estimate by providers noted that a steady stream of \$200,000-300,000 for specialized case management would support higher success rates in exiting from emergency shelter into housing, retaining permanent housing, and avoiding future episodes of homelessness.

Lastly, the potential spread of COVID-19 is especially dangerous for those that are experiencing homelessness, housing instability, or overcrowded conditions. It is not currently known how long the effects of this pandemic will last, which will make it that much more difficult for people with very- and extremely low-incomes to meet their basic needs and remain stably housed. Additionally, the closure of schools means that the Homeless Education Program (HEP) is not able to connect with families as directly as they used to, creating a gap in the system's ability to identify families with children who may be experiencing homelessness.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals, and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on-screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Below is a list of agencies that interact with the homeless services system. Because of the unique nature of each homeless service provider, there is variability in the nature and level of services provided beyond the provision of shelter/housing. Many also provide services specifically for special needs populations.

CoC Agencies	Services & Facilities
Vivent Health (formerly known as AIDS Resource Center of Wisconsin)	One location in the City of Milwaukee that offers the following services to HIV positive clients: Behavioral & Mental Healthcare, Case Management, Pharmacy, Housing Services, Legal Services, Food Pantry, Nutrition Services, Substance Abuse Treatment, Dental Care, Medical Care, PrEP, HIV Testing, STI Testing, Lifepoint Needle Exchange.
Cathedral Center	Focuses on three areas of service for single women and families: Emergency and longer-term housing, case management, and income growth programming.
Community Advocates	Homeless Outreach Nursing Center (HONC) provides person-centered outreach and engagement to individuals with mental illness who are chronically homeless and living on the streets, in vacant buildings, under bridges, or in parks.
	Project Bridge/Autumn West housing program, which follows the Housing First model. Includes immediate access to safe and affordable housing and case management services to Milwaukee residents who have been identified as experiencing chronic homelessness and living with a disability.
	The Milwaukee Women's Center is a division of Community Advocates and provides comprehensive services and treatment for women, men, and children whose lives have been affected by domestic violence, addiction, mental health issues, homelessness, and poverty.
Center for Veterans Issues (CVI)	CVI actively serves veterans and their families with challenges and concerns across 54 counties in Wisconsin. They provide supportive services, transitional housing, and permanent supportive housing that assists veterans to reintegrate and maintain stability.

Friends of Housing	Originally created by HACM in 1996, Friends of Housing manages a number of public housing development including the Berryland, Carver Park, Cherry Court, Convent Hill, Convent Hill Gardens, Highland Gardens, Lapham Park, Northlawn, Olga Village, Project Restore, Reverend Davila, Southlawn, Westlawn, Victory Manor and multiple scattered site properties for HACM.
The Guest House of Milwaukee	Since opening their doors to provide short-term shelter in 1982, Guest House has grown to provide a full continuum of services both onsite and throughout the City, touching thousands of lives and involving the entire community. The agency is the only provider in the CoC that provides emergency shelter for single males, and are one of the main providers of Rapid Re-Housing for single adults.
Heartland Alliance/Heartland Housing	Heartland Alliance, one of the world's leading anti-poverty organizations, works in communities in the U.S. and abroad to serve those who are homeless, living in poverty, or seeking safety. It provides a comprehensive array of services in the areas of health, housing, jobs and justice – and leads state and national policy efforts, which target lasting change for individuals and society. They partner with the CoC to provide permanent supportive housing services; also have a partnership with HACM and Capuchin.
Hope House of Milwaukee	The mission of Hope House is to end homelessness and create healthy communities. They are the only CoC provider to have fully adopted the Rapid Re-Housing model, which focuses on providing transitional care for families as they await housing placement. They also operate a community center located in the near south side of Milwaukee. Opened in 1987, Hope House was created to provide a safe, temporary refuge for people needing a place to sleep.
IMPACT, Inc.	With 60 years of experience serving Southeastern Wisconsin, IMPACT helps people take the first step toward changing their life, for good. They assess and guide those experiencing personal crisis toward resources to achieve stability; and collaborate with community partners to foster system improvement. IMPACT is the administrative lead for Milwaukee's Coordinated Entry (CE) program, housing one of the main access points for the CoC's CE system.
Institute for Community Alliances	Institute for Community Alliances (ICA) is a nonprofit organization based in Iowa that functions as the Homeless Management Information System (HMIS) Administrator in 14 states, providing technical assistance and training support for more than 4,000 database users. ICA supports data-driven solutions and community information systems that help communities address

	housing instability, homelessness, food insecurity and related issues.
La Causa	The mission of La Causa, Inc. is to provide children, youth and families with quality, comprehensive services to nurture healthy family life and enhance community stability.
Mercy Housing Lakefront	Mercy Housing handles every aspect of the affordable housing process, from project financing and housing development to community outreach and long-term resident services. We provide a custom approach to affordable housing which allows us to help more people and more communities while ensuring that each project is completed to our high standards
Milwaukee County Housing Division	Milwaukee County's supportive housing programs assist individuals who have mental illness in obtaining safe and affordable housing. Since 2008, the County has helped create over 700 permanent supportive housing units, and supports transitional housing and harm reduction housing using the Housing First model.
Outreach Community Health Centers	Outreach provides rental subsidy for 45 units of housing for periods that range from three to eighteen months. The length of subsidy is determined at the time of program entry, and is based on the unique strengths and challenges of each family unit.
Pathfinders	Pathfinders helps homeless and housing insecure youth find and sustain safe housing. Once housed, they offer support to youth as they work towards stability, mental well-being, education, employment and other personal goals.
The Salvation Army of Milwaukee	Since 1979, the Emergency Lodge at N. 7th Street in Milwaukee has 120 beds that provide emergency shelter to homeless individuals and families with children. More than 80% of residents successfully move from shelter to safe, affordable housing each year.
Sojourner Family Peace Center	Sojourner Family Peace Center is the largest nonprofit provider of domestic violence prevention and intervention services in Wisconsin, serving over 11,800 clients each year. Sojourner provides an array of support aimed at helping families affected by domestic violence achieve safety, justice and well-being.
St. Catherine's Residence	Provides housing in partnership with Mercy Housing Lakefront for up to 164 women in suite-style apartments, with shared baths and community kitchens. Women may rent short- or long-term and stay as long as they need.
Walker's Point Youth and Family Services	Serves homeless single or parenting young men and women ages 17-24 years old. Programs offer longer-term housing (for up to 24

months) and supportive services to prepare them for self-sufficiency and independence.	
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Learn more about Milwaukee's Continuum of Care at www.milwaukeecoc.org .

Other Agencies Addressing Homelessness	Services & Facilities
Dryhootch	Formed by combat Veterans to help Veterans in their return home by providing a place where they can gather informally in a coffee house; a safe, comfortable, drug-and-alcohol-free environment. Offers a variety of peer-focused supportive services.
Lutheran Social Services of Wisconsin and Upper Michigan	A Midwest health and human services organization that has been operating since 1882. Housing programs include providing safe, decent, and affordable housing for a variety of persons with special needs. Also have a Veterans housing and recovery program in Racine County that offers services to Federally-recognized veterans with mental illness, AODA, and at risk of homelessness.
Milwaukee Homeless Veterans Initiative	Founded and run by veterans, MHVI offers six programs that include case management/supportive services, assistance with securing stable housing and supplies, homeless outreach, services specifically for female veterans, and help with meeting basic needs.
Milwaukee Rescue Mission	The Rescue Mission offers three distinct programs for families in crisis. Joy House for women and children, Safe Harbor for men, and Cross Trainers Academy for children.
Street Angels of Milwaukee	The Angels offer basic necessities such as food, clothing, blankets, and hygiene items to people experiencing homelessness in Milwaukee.
The Benedict Center	Provides services for women with past interaction with the criminal justice system and/or formerly incarcerated.
Vets Place Central	Provides transitional housing for male and female veterans experiencing homelessness, including wraparound supportive services designed to assist with reintegrating into the community and moving into permanent housing.
VA Hospital	Provide a national call center for veterans who are homeless or at imminent risk of homelessness to connect them with assistance.

Veterans Affairs Supportive Housing (VASH) / HUD	VASH provides rental assistance vouchers, which are primarily directed through the City housing authority to expand support for homeless veterans.
NOTE: A number of other nonprofit and other organizations provide services to help address housing security and prevent homelessness such as food pantries, faith-based entities, neighborhood-based groups, etc.	

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

As described in NA-40 (Non-Homeless Special Needs assessment), the following groups were identified as requiring a specific focus on their needs: individuals living with HIV/AIDS, seniors/elderly, veterans, people with disabilities, those that were formerly incarcerated, immigrants and refugees.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
Tenant-based Rent Assistance	
(TBRA)	0
Permanent Housing (PH) in facilities	0
Short-term Rent, Mortgage & Utility	
Assistance (STRMU)	136
Short-term or Transitional Housing	
(ST/TH) facilities	30
Permanent Housing (PH) placement	162

Table 44- HOPWA Assistance Baseline

Data Source: City of Milwaukee HOPWA CAPER Performance Profile (1/1/18 to 12/31/18)

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs.

Section NA-40 provides detail on the needs of special needs groups, noting that supportive services such as employment and job training, access to legal services, healthy food, mental and physical health care would benefit all. Below is some additional information on providers and services available for specific groups.

Individuals Living with HIV/AIDS

There are two main service agencies providing supportive services and housing assistance to persons living with AIDS: Vivent Health (formerly AIDS Resource Center of Wisconsin) and Richard's Place. Currently there are 23 Transitional Housing beds funded through HOPWA (Wisconsin House, Elena's House and Richard's Place), but more clients were served in coordination with other Continuum of Care (CoC) providers. There are currently no designated permanent supportive housing units as part of the Housing Opportunities for Persons with AIDS (HOPWA) program. Most of the HOPWA-related housing assistance is via Short-term Rent, Mortgage & Utility Assistance (STRMU), averaging about 135-140 people per year. This varies each year based on both funding available and requests for this type of assistance.

As described in NA-40, HOPWA service providers shared that supportive housing needs for persons with HIV/AIDS and their families include assistance with coordinating health care, accessing needed medications, training on medication management, securing housing, managing finances, food access, and legal services.

Seniors/Elderly, People with Disabilities and Veterans

While a growing number of public housing facilities and other affordable housing developments in Milwaukee are dedicated to meeting the needs of seniors, there is still a need for additional permanent supportive housing for this population. In MA-25 (Public & Assisted Housing), 14 out of 20 HACM/public housing developments (not including scattered sites) are designated specifically for seniors and/or people with disabilities either in their entirety or with a set number of units. Milwaukee County Department of Aging provides supportive services to seniors; CoC members, and a number of neighborhood-based and/or community organizations also connect seniors to resources such as home repair, maintenance and basic needs.

Disability Rights Wisconsin helps coordinate service providers through a variety of coalition-based activities, and produces a family-friendly guide to services in Milwaukee County for special needs children, youth and their families. Milwaukee County's Disability Resource Center provides individuals with information and assistance with resources, programs, and services, including disability accommodations, housing, day programs, in-home health services, supportive employment and other work programs, transportation, etc. Lastly, Milwaukee has a number of nonprofit organizations that focus specifically on serving people with disabilities, providing a wide range of supportive services and assistance (Broadscope, Easter Seals, IndependenceFirst, Milwaukee Center for Independence, etc.).

MA-30 (Homeless Facilities and Services), provides a list of service providers that assist veterans with a wide range of needs related to housing and basic needs, such as Center for Veterans Issues, Dryhootch, Milwaukee Homeless Veterans Initiative, Vets Place Central, etc.

Revitalize Milwaukee provides free, critical home repairs and comprehensive services to low-income seniors, veterans, and people with disabilities.

<u>Formerly Incarcerated</u>: A number of service providers provide assistance with a range of issues connected to stable reentry after incarceration, such as housing, employment, trauma-informed care, etc. These organizations include the Alma Center, Genesis, Project Return, The Benedict Center, Wisconsin Community Services, etc. Additionally, the Milwaukee Reentry Council is a community-member facilitated, reentry committee created by the Milwaukee Community Justice Council in late 2016 that works across sectors to better serve this population.

<u>Immigrants & Refugees</u>: This population faces some unique challenges related to daily living in a new country, including navigating cultural and language barriers and the U.S. legal system, and assistance with securing financial and housing stability. The International Institute of Wisconsin and Lutheran Social Services are the two largest service providers in Milwaukee for immigrants and refugees.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Milwaukee CoC has strong partnerships with behavioral and physical health institutions. Any person being discharged from an institution is connected to the Coordinated Entry System for connection both permanent and emergency housing. In particular, the Milwaukee County Housing Division has 1 FTE dedicated just to housing navigation for those leaving physical health institutions.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e) - STRATEGIC PLAN

The City of Milwaukee will work with Milwaukee County and other networks that serve the special needs populations described in this section and in NA-45 to meet their supportive housing needs. Stable housing is closely linked to the success of larger outcomes related to financial stability, improved physical and mental health, and securing employment.

For example, the use of Tenant Based Rental Assistance and/or Short-term Rent, Mortgage & Utility Assistance (STRMU) has proven effective in helping people stabilize their housing situation so they can be connected to other supportive services. Service providers have shared that there is a greater need for more permanent supportive and transitional housing programs that serve individuals living with AIDS, veterans, and the formerly incarcerated. Additionally, supporting case management and peer-support models is a critical component to people being able to access a wide range of consistent supportive services.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2)) - ACTION PLAN

See above; the activities would follow the same approach.

MA-40 Barriers to Affordable Housing – 91.210(e)

One of the most significant barriers to affordable housing in the City of MIlwaukee is that household income has not kept pace with the cost of housing. More people are spending a significant amount of their income on housing costs and generally have difficulty finding safe and decent housing in the private market. This was described in greater detail in the Needs Assessment sections on housing cost burden (NA 15-30).

The median household income in the City is significantly lower than surrounding communities; poverty and unemployment rates are significantly higher than in the metro area, indicating that there is strong demand (and need) for affordable units as the City of Milwaukee is home to a high percentage of the region's low income households. The gap in supply of affordable rental units is greatest for very to extremely low-income.

Additionally, the significant decline in both the number and percentage of households that owned their own homes since the Great Recession, along with an increase in investor-owned properties has created barriers to affordable homeownership in the market. The city's older housing stock presents challenges as the cost of home repair/maintenance can be prohibitive for low- to moderate-income households and/or owners with high monthly housing costs.

Nearly 68% of respondents to the Consolidated Plan community survey stated that housing discrimination was common in Milwaukee County. There is still often community opposition to affordable housing developments both in city neighborhoods, but also in other jurisdictions in the region.

Lastly, Milwaukee's continued standing as one of the most segregated cities and metro areas in the country is a result of a long history of structural and institutional racism. The legacy of past "redlining" practices continues to manifest in deep racial and economic inequalities in the region, including a persistent and startling racial wealth gap.

Negative Effects of Public Policies on Affordable Housing and Residential Investment

In 2019, the City of Milwaukee participated in a collaborative "Regional Analysis of Impediment to Fair Housing" as part of the *Affirmatively Furthering Fair Housing (AFFH)* requirement by HUD. Although HUD effectively suspended implementation of the agency's 2015 AFFH regulation in January 2018, the City and its partners agreed to move forward with the analysis, which was released for public comment in November 2020 and will be submitted with the City's 2020-2024 Consolidated Plan.

The analysis included the counties of Mllwaukee, Jefferson, Ozaukee, Washington, and Waukesha, plus the municipalities of Wauwatosa and West Allis. The resulting analysis was completed in 2020, and took a deeper look at some of the longstanding systemic problems that plague the region. These impediments range from and are not limited to:

- Lack of regional strategy and housing plan
- Lack of regionally dispersed affordable housing
- Restrictive land use regulations and exclusionary zoning ordinances
- Prevalent "NIMBYism" or fear of others in some communities
- Strong jobs-housing-transit mismatch across the region

- Lack of fair housing guidance and enforcement
- Lack of accessible housing for persons with disabilities
- Racial disparities in homeownership
- Overcrowded housing
- Extensive use of evictions

The assessment also found that Milwaukee, being the largest City of the collaborative, has some distinguishing characteristics that deserve special attention (although some were also shared by the older suburban cities in the collaborative). These characteristics include:

- Gentrification in some neighborhoods surrounding the downtown area
- A lack of private investment in specific neighborhoods
- Racial and ethnic disparities in mortgage lending, insurance and appraisal practices
- A lack of awareness of fair housing laws

Lastly, barriers to affordable housing development outside the City continue to prevent affordable housing for families from being developed for the most part anywhere <u>except</u> in the City of Milwaukee. While the region is seeing new affordable housing development announcements in the surrounding communities, the issues described above are still very prevalent in Milwaukee and contribute to our region's extreme racial segregation.

MA-45 Non-Housing Community Development Assets – 91.215 (f) Introduction

The following section provides data and summary research of the major economic and workforce conditions present in the City of Milwaukee.

Economic Development Market Analysis

The following tables include data provided by HUD's Integrated Disbursement and Information System (IDIS) as part of the Consolidated Plan development. Note these figures are the most recent data provided by IDIS. If more current data was readily available, it is noted in the Data Source information.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	% Share of Workers	% Share of Jobs	% Jobs less workers
Agriculture, Forestry, Fishing and Hunting	289	28	0.1%	0.0%	0.1%
Mining, Quarrying, and Oil and Gas Extraction	62	27	0.0%	0.0%	0.0%
Utilities	698	1,643	0.3%	0.5%	-0.3%
Construction	5,523	5,689	2.1%	1.9%	0.2%
Manufacturing	31,259	27,382	11.8%	9.1%	2.7%
Wholesale Trade	8,475	11,514	3.2%	3.8%	-0.6%
Retail Trade	24,838	20,304	9.4%	6.7%	2.6%
Transportation and Warehousing	8,643	9,096	3.3%	3.0%	0.2%
Information	4,209	6,050	1.6%	2.0%	-0.4%
Finance and Insurance	10,528	18,162	4.0%	6.0%	-2.0%
Real Estate and Rental and Leasing	2,877	3,912	1.1%	1.3%	-0.2%
Professional, Scientific, and Technical Services	10,359	17,302	3.9%	5.7%	-1.8%
Management of Companies and Enterprises	8,364	14,537	3.2%	4.8%	-1.7%
Administration & Support, Waste Management and Remediation	25,668	22,643	9.7%	7.5%	2.2%
Educational Services	22,132	28,721	8.4%	9.5%	-1.2%
Health Care and Social Assistance	51,092	55,205	19.3%	18.3%	1.0%
Arts, Entertainment, and Recreation	5,173	7,889	2.0%	2.6%	-0.7%
Accommodation and Food Services	24,700	24,384	9.3%	8.1%	1.2%
Other Services (excluding Public	8,309	11,213			
Administration)			3.1%	3.7%	-0.6%
Public Administration	11,634	15,820	4.4%	5.2%	-0.9%
TOTAL	264,832	301,521	100.0%	100.0%	0.0%

Table 45 - Business Activity

Data Source: PIC (PIH Information Center)

Labor Force

Total Population in the Civilian Labor Force	297,790
Civilian Employed Population 16 years and	
over	262,725
Unemployment Rate	11.77
Unemployment Rate for Ages 16-24	28.44
Unemployment Rate for Ages 25-65	7.70

Table 46 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	48,110
Farming, fisheries and forestry occupations	11,060
Service	37,730
Sales and office	59,635
Construction, extraction, maintenance, and repair	14,410
Production, transportation and material moving	17,255

Table 47 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time	Number	Percentage
< 30 Minutes	181,435	72%
30-59 Minutes	57,075	23%
60 or More Minutes	11,985	5%
Total	250,495	100%

Table 48 - Travel Time

Data Source: 2011-2015 ACS

Education

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labo		
	Civilian Unemployed		Not in Labor
	Employed		Force
Less than high school graduate	22,885	5,250	22,135
High school graduate (includes			
equivalency)	55,055	8,260	24,375
Some college or Associate's degree	67,520	7,760	19,265
Bachelor's degree or higher	64,505	2,425	8,100

Table 49 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	975	3,885	4,730	8,875	6,370
9th to 12th grade, no diploma	11,745	9,205	8,400	15,170	8,445
High school graduate, GED, or					
alternative	21,420	24,485	21,610	41,600	20,235
Some college, no degree	33,780	25,070	16,460	30,570	9,755
Associate's degree	1,615	6,870	5,860	9,765	2,135
Bachelor's degree	6,290	22,810	11,325	16,235	5,605
Graduate or professional					
degree	355	7,865	6,390	10,440	4,160

Table 50 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment - Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	19,135
High school graduate (includes equivalency)	24,858
Some college or Associate's degree	28,144
Bachelor's degree	42,340
Graduate or professional degree	56,145

Table 51 - Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors within our jurisdiction are Health Care and Social Assistance, Manufacturing, Administration & Support/Waste Management & Remediation, Retail, Accommodation & Food Services, and Educational Services.

The table also shows that as of the 2016 data, there was a surplus of jobs in Manufacturing, Retail, Administration & Support/Waste Management & Remediation, Accommodation & Food Services, and Health Care & Social Assistance. The following chart shows how they rank in terms of share of workers and share of jobs.

Major Employment Sectors - City of Milwaukee

Sector		Number of	% Share of	Rank: % Share of Jobs
Health Care & Social Assistance	51,092	55,205	1	1
Manufacturing	31,259	27,382	2	3
Administration & Support/Waste Management & Remediation	25,668	22,643	3	5
Retail Trade	24,838	20,304	4	6
Accommodation & Food Services	24,700	24,384	5	4
Educational Services	22,132	28,721	6	2

Data Source: PIC (PIH Information Center)

Describe the workforce and infrastructure needs of the business community:

Workforce Trends / Major Considerations for the Business Community

- Loss of Jobs in Higher-Paying Sectors: Even though manufacturing, which generally pays higher wages, is the second largest sector for employment in Milwaukee, the sector has continued to lose jobs over the past two decades. Over that same time period, jobs in lower-paying sectors have been added in the local economy. The fastest growing sector continues to be health care/social assistance, which pays an average wage that is less than manufacturing. Average pay during this time has increased very slightly (by \$3,500), but in real dollars, Milwaukee households are earning less a year than they did in 2000 ("By one key measure, household income, metro Milwaukee is worse off than it was in 1980", Gousha & Johnson, Milwaukee Journal Sentinel, 10/30/20).
- **Demographic Changes:** The rapidly growing Latino demographic is driving population growth in the City. Without this growth, the City's population would remain flat or decrease. While the growing Latino population means more workers for businesses, educational attainment is relatively low but rising. Latinos are greatly underrepresented in high-wage occupations paying a median annual wage of \$60,000 or higher. Many of those are among the fastest-growing in the region, including management, business, and financial operations, healthcare practitioners, and computer and mathematical occupations. (<u>Upward Mobility Public Policy Forum</u>)

- **Number of Workers Available:** Milwaukee faces a worker quantity challenge. The number of retiring Baby Boomers nearly matches the influx of new workers, resulting in a slow-growing workforce and placing constraints on the ability of employers across all industries to hire talent. Many businesses report that the lack of available workers has hindered expansion and, in some cases, even curtailed their ability to meet current product orders. All industries are projected to grow an average of 3.6% over the next six years (2019 Workforce Profile Milwaukee County).
- Low Rates of Startup Activity: In 2017, Milwaukee was the lowest-ranked major metro area for startup growth activity according to the Kauffman Index. More innovation in terms of offering financing and technical assistance to new and early-stage existing businesses is needed. The recent engagement of large businesses like AdvocateAurora, Northwestern Mutual, and others have begun to provide much-needed support for the emerging tech community, but more work needs to be done to ensure everyone in Milwaukee benefits from these efforts, particularly communities of color.
- Impact of COVID-19: The most significant impact and resulting recession/loss of jobs has been in the service sector (retail, accommodations & food services, tourism). There was also some early impact in manufacturing and construction (which are recovering); Education, Health Care & Social Assistance and Child Care have all been significantly affected by COVID-19 as well (Wisconsin Tomorrow An Economy for All, WEDC, 6/30/20). More detail about this is described below.

Infrastructure Trends / Major Considerations for the Business Community

- Maintenance of Public Infrastructure: The cost of appropriately maintaining much of the public
 infrastructure on which Milwaukee's economy and quality of life depend exceeds the financial
 capaCity of local governments to meet it. This creates production, transportation, and talent
 recruitment and retention challenges for the City. (<u>Picking up the Pieces Public Policy Forum</u>)
- Lack of Investment in Regional Transportation: Employers in the region continue to state that transportation is a barrier to hiring and retaining workers. Milwaukee's lack of a regional transportation system, sustainable resources for public transportation, and decreasing or flat revenues from the state to support transportation and road infrastructure make it difficult for the City to address these challenges in a comprehensive way. The City is an active participant in the Regional Transit Leadership Council, which is focused on transportation solutions to improve workforce mobility.
- **Employment and Access to Jobs Forecasts:** The Southeastern Wisconsin Regional Planning Commission's SEWRPC long-range regional land use and transportation plan (<u>VISION 2050</u>) shows that estimates of population and household growth are lagging forecasts, with estimates at the regional and county levels generally being within 2% to 8% percent of forecasts. The report also finds that estimates of employment are exceeding forecasts by about 3% to 10%, attributing this to the economic recovery experienced by the region since 2010. However, these projections were done prior to the COVID-19 pandemic and the resulting economic recession.

SEWRPC also completed an Equity Analysis as part of the update to VISION 2050 in early 2020. About 4-13% of the non-white population in southeast Wisconsin uses public transit to get to work, health care, education, and other activities compared to about 3% of the white population. The equity analysis found that if the transit recommendations in VISION 2050 were implemented, four times as many people of color, families in poverty and/or people with disabilities would have access to jobs. For example, under the existing system about 50% of families in poverty have access to 10,000 or

more jobs that are within 30 minutes. Under VISION 2050 this would go up to just over 80% of these families having access. In fact, unless additional funding is invested in transit systems, a disparate impact to these population groups is likely (<u>SEWRPC VISION 2050 Equity Analysis</u>).

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support, or infrastructure these changes may create.

While fairly comprehensive (but not complete), listed below are programs/projects/developments that will begin or continue to have an economic impact on the City of Milwaukee. The estimated total investment of these developments is about \$11.5 billion.

City of Milwaukee-focused

- **30th Street Industrial Corridor:** Includes Business Improvement Districts (BIDS) and Century City; manufacturers continue to develop projects and add jobs on this site. It is an area of significant focus for the Department of City Development to attract new businesses to this corridor.
- **Bader Philanthropies Headquarters:** With a projected cost of \$4.6 million including building purchase and construction, this new center in a formerly vacant building opened in 2019 in the heart of the Harambee Community.
- **Brew City Match:** Managed by LISC Milwaukee, this program includes \$3.5 million from Chase Bank over five years to launch new initiatives that support the growth of small businesses and entrepreneurs with partners such as area CDFIs, Kiva Milwaukee, Scale-Up Milwaukee, and Milwaukee's very active group of chambers that serve communities of color, the LGBTQ community, and Veterans through the Ethnic and Diverse Business Coalition (EDBC). This has led to increasing economic vibrancy in Milwaukee's commercial corridors and main streets.
- **Fiserv Forum / Deer District:** A \$524 million arena development that will support increased convention business, new hotels and entertainment. Along with an increase in hospitality workers, this development is also expected to drive the need for construction workers and the skilled trades for the next five years.
- **Greater Milwaukee Foundation and Medical College of Wisconsin**. In 2019 these two institutions announced an \$84.5 million joint investment that will become the future neighborhood and home of their community-based partnership.
- **The Harbor District:** This \$100 million revitalization project just south of Downtown is just getting underway, and includes commitments to build a new innovation and manufacturing center and multi-family housing.
- **The Hop Streetcar:** This new transit investment of \$133.64 million offers transit-oriented development opportunities, including jobs for construction workers and operators, an increase in property values, and potential development along extension routes.
- **Northwestern Mutual Headquarters:** Completed in 2017, this investment in downtown Milwaukee is estimated at \$450 million; a new, signature office tower for the wealth management company.

- **Sherman Phoenix:** A \$4 million catalytic retail/incubator space project that opened in an underserved neighborhood; the intent is for this development to support the development of new businesses and the real estate in the vicinity.
- **UpStart Kitchen:** Opening in September 2020, this incubator kitchen was created with the goal of assisting food entrepreneurs from traditionally underserved urban neighborhoods. Upstart offers affordable commercial kitchen spaces, technical assistance, and other forms of support.

Regionally-focused

- AdvocateAurora Health: In 2019, this health care system (one of the largest in the state) announced it will invest \$50 million over the next five years to address disparities that affect health outcomes in Wisconsin and Illinois communities. Note, a number of Milwaukee area health care systems are following suit with new initiatives in addressing the social determinants of health (a strong connection to housing).
- Amazon Fulfillment Centers: The Amazon Warehouse in the Racine-Kenosha area employs around 1,000 people and is estimated at \$105 million. A second center is under construction in Oak Creek in Milwaukee County.
- **Foxconn:** Also in the Racine-Kenosha area, this investment was initially announced in 2017 as a \$10 billion development with significant job creation targets that will include a fabrication facility and campus for Foxconn Technology Group in Mt. Pleasant. Originally planned as a large-panel LCD screen production facility, Foxconn recently announced they <u>scaled back those plans</u>; state economic development incentives are being reviewed and it is unclear what the ultimate economic impact for the region will be.
- **Regional Transit Leadership Council:** Founded in 2016, the council has the vision to foster regional, modern, flexible and efficient transportation by uniting public and private sector leaders from throughout the seven-county Southeastern Wisconsin region around strategies and actions to connect the region with robust multi-modal transportation options. This effort was launched in order to address the lack of regional transportation options and to improve the effectiveness and integration of existing transportation options.

New initiatives supporting Milwaukee's startup and entrepreneurship community

After years of low startup growth, major companies in the area have started to get involved in supporting the City's entrepreneurship sector, along with a rise in programming dedicated to supporting startups. Some significant investments include:

- Advocate for Aurora's Invest MKE: A venture committed to investing in technologies and innovations that will make wellness easier, more efficient, and more personalized. Aims to support high-growth companies in southeast Wisconsin that leverage top talent to create solutions relevant to their areas of interest: Digital Health Transformation, Next Generation Innovation, and Wellness Beyond Health.
- **Jet Constellations' Milky Way Initiative:** Working to transform Milwaukee into a tech hub that represents the City's diverse population through community workshops, panels, talks, hackathons, and design thinking sessions. The Milky Way Initiative aims to foster an inclusive tech scene in Milwaukee that is made up of creators and innovators that are representative of its population.

- **Kiva Greater Milwaukee:** Launched in 2015 in partnership with the Wisconsin Women's Business Initiative Corp. (WWBIC), this crowd-funded based model works with local small business service providers and provides 0% interest capital to local small businesses. Through direct lending on the Kiva platform, individuals and groups can invest in local entrepreneurs and help them achieve economic mobility. By late 2018 Kiva Greater Milwaukee had lent over \$1.13 million to 200+ borrowers.
- **Northwest Mutual's Cream City Venture Capital:** Dedicated to investing solely in startups based in southeast Wisconsin; there is no industry focus but the fund looks to partner with companies that are leveraging technology to address problems in large markets. They seek to make investments at the earliest stages of business to provide capital at a critical point in a company's growth. Initial investment amounts will be in the \$100,000 to \$250,000 range.
- **Startup Week Milwaukee:** Held every November, this week-long event provides entrepreneurs with access to mentorship, capital, talent, and a community of like-minded entrepreneurs, with the goal of making Southeast Wisconsin among the best places to launch and grow a high-growth company.
- ScaleUp Milwaukee: Launched in 2013, this initiative of the Greater Milwaukee Committee assists companies to grow, accelerating the environment that makes growth a core, self-sustaining part of the fabric of Milwaukee. ScaleUp uses accelerator and cohort model programs to support entrepreneurs, including: SPARC, a cohort model training course for minority- and women-owned businesses in the Milwaukee area located in the central city with revenues between \$100,000 to \$1 million; and Growth Accelerator, a high-growth training program for businesses with approximately \$1M-\$10M in annual revenue that focuses on increasing growth ambition and capacity by improving sales and marketing, organizational development and finances.

Weathering the Economic Impacts of COVID-19

As of the writing and submission of this plan, it is too early to fully gauge the impacts of the COVID-19/coronavirus pandemic on Milwaukee's economy, but early indicators reveal that the City's business and employment landscape has already been altered in significant ways. According to the Wisconsin Policy Forum's COVID-19's Impact on Jobs in Wisconsin report, the hardest-hit sectors are accommodation and food services; arts, entertainment, and recreation; personal care services; and most types of retail trade not deemed essential.

Using employment data from the Census Bureau, the report shows that Milwaukee County has more than 88,000 jobs in hard-hit sectors. A portion of those jobs are in some of the states of Wisconsin's most-visited entertainment and cultural venues, including Miller Park, Fiserv Forum, Potawatomi Hotel and Casino, and the Milwaukee Art Museum - all of which are in the City of Milwaukee and continue to experience total and/or partial closures to the public for the near future.

The projects/assets detailed above will no doubt see changes to their development timelines, demands, and even feasibility in the short and long term as a result of COVID-19. Small businesses and community-based organizations that operate on already tight margins have had to quickly pivot their service delivery methods to meet evolving needs, while also complying with confusing and sometimes costly public health and safety recommendations. At this point, there is much emphasis in the business community on employee/business retention rather than growth.

While the federal government has provided much-needed support to small businesses and community-based organizations through loan and grant programs, many have not been able to secure the necessary funding in time. Minority-owned businesses have struggled in particular to qualify for and receive financial support. In response, several Milwaukee entities have offered relief options for current grantees and borrowers, and also developed new loan and grant programs aimed at helping small businesses and nonprofit organizations maintain operations and retain staff. Additionally, it is likely that many of these community-response programs will see a demand for support that exceeds their capacity.

The major community foundations and funders such as Bader Philanthropies, Bradley Foundation, Brewers Community Foundation, Burke Foundation, Greater Milwaukee Foundation, Herb Kohl Philanthropies, United Way of Greater Milwaukee and Waukesha County, and Zilber Family Foundation etc. have not only announced significant contributions specifically for COVID-19 related impacts "MKE Responds" fund), but have also come together to coordinate the community response to the COVID-19 pandemic, working closely with the City of Milwaukee and a diverse array of community-based stakeholders.

Additionally Wisconsin Economic Development Corporation (WEDC) has been a significant source of funding to assist small businesses and service providers in the response. They have implemented three grant programs, totaling over \$80 million that targeted businesses of various sizes, those operated by people of color, immigrants, etc. The last program, "We're All In" provides businesses with funding and guidance on implementing public health safety measures for employers and customers. Much of this funding has supported a number of the initiatives listed below that various groups launched to support small businesses.

- African American Chamber of Commerce Ethnic Minority Emergency Grant: Grants of up to \$2,000 from WEDC for minority-owned businesses with five or fewer full-time employees in the retail, service, or hospitality sectors that had not received assistance through the U.S. Small Business Administration (SBA) Paycheck Protection Program (PPP) through the federal CARES Act.
- **Brew City Match COVID-19 Small Business Grant:** Coordinated by LISC Milwaukee, provides up to \$1,200 to assist small businesses with rent and payroll support.
- **Brew City Match COVID-19 Small Business Emergency Loan Fund:** Coordinated by LISC Milwaukee, provides zero-interest loans to small businesses to assist with rent, payroll, and other business expenses.
- City of Milwaukee Restart Grant Program: Using federal CARES Act funds, this program provided grants to help local businesses implement safe practices and other investments to continue operations, particularly in compliance with public health and safety orders. The first round deployed \$4 million in grant funds; a second round of an additional \$10 million was announced in October 2020.
- Ethnic & Diverse Business Coalition (EDBC) COVID-19 Small Business Impact Grant: Provides grants of up to \$500 to small, ethnic and diverse businesses of any industry that are members of one of the 14 chambers of commerce and partner organizations in the EDBC.
- **Hmong Wisconsin Chamber of Commerce Emergency Loan Fund:** Loans from \$5,000 to \$10,000 for small businesses to be used for working capital to cover rent, payroll, and other fixed expenses.
- Layton Boulevard West Neighbors Small Business Grants: Businesses must be located in the Silver City, Burnham Park, or Layton Park neighborhoods and have less than 15 employees or be a single-owner LLC or sole proprietorship. Priority funding is for minority and/or women-owned

- businesses, recently established businesses, and/or businesses operated by persons using an ITIN. Grant amounts ranged from \$2,000 to \$6000 per business.
- **LISC Small Business Relief Grants:** Grants targeted to those in underserved communities, including entrepreneurs of color, women- and veteran-owned businesses that often lack access to flexible, affordable capital.
- Mas Fuertes Bilingual Business Relief and Recovery Program: Microloan fund from the Latino Chamber of Commerce of SE Wisconsin provides Latino-owned micro enterprises (2 to 9 employees) with up to \$3,000 to cover payroll and rent for a month.
- Metropolitan Milwaukee Association of Commerce (MMAC): Along with WEDC, providing area businesses with a consistent source of information related to navigating the public health pandemic. Their "Smart Restart Health and Safety Toolkit" and "PPE Product Marketplace" helped businesses navigate health and safety protocols.
- **Project Optimize:** A project of the Wisconsin Women's Business Initiative Corp. (WWBIC), offers a targeted, one-year initiative to provide education, training, and business coaching to women and socially/economically disadvantaged business owners affected by COVID-19.
- Wisconsin Veterans Chamber of Commerce COVID-19 Relief Fund: Targeted to nonprofit social services providing housing, health and wellness, and economic empowerment services to veterans, service members, and their families.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to Table 49 (Educational Attainment by Employment Status), Milwaukee has about 132,000 working age people in the labor force that have some college or an advanced degree. Along with that though, there are about 55,000 people with a high school diploma only and about 22,000 high school graduates are not in the labor force. Additionally there are an additional 22,885 people who have less than a high school diploma in the labor force. Educational attainment has a significant impact on the ability of people to access jobs with livable wages. For example, Table 51 shows that the median earnings for someone without a high school diploma is \$19,135; for someone with some college median earnings are about \$28,000; and for those with a Bachelor's degree or higher, \$42,000 and above. Additional trends analysis for the tables in this section was provided by Data You Can Use, which can be viewed in the Appendix.

Beyond skills and education, Milwaukee's population isn't growing fast enough to fill both the positions that are being vacated by retiring Baby Boomers and the projected job growth. A countervailing factor to slow population growth is the automation of routine and repetitive tasks, meaning those with low or limited education are at risk of being displaced through automation. An estimated 56% of current jobs have the potential to become automated. There is a strong demand for workers in health care and education that is expected to continue well into the future.

Employers in all sectors list problem-solving, communication, and collaboration as essential workforce skills. Skills such as these are highly transferable across sectors. Computer and mathematical skills are projected to be in high demand, though the total number of positions that strongly require these skills is still relatively small. Overall, there is much space for improvement to upskill and retrain workers to be more competitive in

the labor market as a significant portion of Milwaukee's population is not well-suited to current or future workforce opportunities.

Table 46 shows that the unemployment rate for those ages 25-65 is 7.7%, which is relatively unchanged from the last Consolidated Planning period. According to 2018 data from the American Community Survey, Milwaukee's unemployment rate varies among Whites alone (3.1%), not Hispanic or Latino (2.5%), Blacks alone (7.9%), and Hispanic or Latino origin (6.0%). The City has begun to look more holistically at employment and workforce challenges by recognizing that issues such as trauma and incarceration play key roles in employability, particularly for black males.

Employ Milwaukee, the workforce development board in the City, utilizes a sector-based strategy in its programming. Sector strategies promote regional partnerships among employers, educators, workforce development, economic development and other stakeholders that address the skill needs of high demand industries and occupations. Sector strategies are a proven mechanism for meeting the needs of employers for skilled workers and the needs of workers for employment.

Milwaukee continues to face high demand for workers in construction and the skilled trades. Programs such as WRTP/BIG STEP, a joint effort of the Wisconsin Regional Training Partnership, and the Building Industry Skilled Trades Employment Program (in partnership with Literacy Services Wisconsin), is an apprenticeship readiness, tutoring, and training program aimed at helping local residents succeed in construction trades careers. Community-based organizations Employ Milwaukee, the Social Development Commission and the Milwaukee Christian Center focus specifically on training youth in construction and trades through Youth Build programs, some of which also help participants earn their high school diploma.

The Greater Milwaukee Committee initiative, The Commons, is predominantly aimed towards talent retention for white-collar employees in area corporations. This program has been very successful and is expanding its programming across the state. The Metropolitan Milwaukee Association of Commerce has three programs targeted at workforce engagement: the Be the Space business education tour program, the CAREERx program for manufacturing, and the FUEL Milwaukee effort which caters to young professionals.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges, and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

There are numerous workforce training programs in the City of Milwaukee. The lead entity at the forefront of many of these initiatives is Employ Milwaukee, the area's workforce investment board and federally-funded workforce development agency (established in 2007). Employ Milwaukee is comprised of private businesses, local government departments, educational institutions, nonprofit/community groups, labor organizations, and foundations.

Additionally, there is the Milwaukee Area Workforce Funding Alliance (WFA), a consortium of private and public funders of workforce development programs and services, including education, job training and placement, and other supports. Members include local foundations, major regional employers and several public sector agencies. The collaborative's goals include advocating for policies that sustain effective workforce partnerships, strengthening and expanding the workforce system by leveraging local investments,

building the capaCity of the workforce system, improving career advancement opportunities for low-income individuals and helping employers get the skilled workers they need.

Generally, workforce development-related programs are supported through a mix of federal and state funds and focus on activities such as adult basic education and GED preparation to on-the-job training in several different industries, or assist inmates and offenders on probation or parole to secure employment. Many nonprofit / community-based organizations offer customized training programs (often in partnership with MATC and WCTC), or activities such as pre-employment training certificates for occupations (i.e. carpentry, machining, welding, heavy highway construction, underground construction, and utility line construction).

While not complete, the following table is a fairly comprehensive list of workforce training programs active in the City of Milwaukee and provides a sense of the various programs and services available.

City of MILWAUKEE		
Program	Role	Website
Compete Milwaukee	Transitional Jobs	https://city.milwaukee.gov/CDG A#.Xp3fychKi00
Community Development Grants Administration	Administers Federal HUD entitlement dollars; funds non-profit job training & placement agencies	https://city.milwaukee.gov/CDG A
Housing Authority (HACM)	Employment Related Services for public housing program participants	http://www.hacm.org/
EMPLOY MILWAUKEE		
Program	Role	Website
Adult and Dislocated Worker Programs	A Workforce Innovation and Opportunity Act (WIOA) initiative that provides a variety of training, basic education & occupational skills services.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Reentry/Adult-and-Di slocated-Worker-Programs.htm
America's Promise	America's Promise Grant Program will provide individuals with the opportunity to get high-quality education and training that leads to in-demand and industry-recognized credentials and degrees.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Adult-Youth-Progra ms/Americas-Promise.htm
BankWork\$	A national model program in partnership with the Wisconsin Bankers Association. Provides eight weeks of retail banking career training and focuses on young adults and adults from low income and minority communities to help them find positions in banking/financial services.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Adult-Youth-Progra ms/BankWork.htm

Earn and Learn	A summer youth employment program initiated by Mayor Tom Barrett in partnership with local business, non-profit, and community- and faith-based organizations. Assists Milwaukee young people in making a successful transition from adolescence into adulthood through job skills and work experience.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Job-Placement/Earn Learn-Summer-Youth-Employm ent.htm
Reentry Employment Services	To help citizens overcome barriers and successfully reenter the community, and provide innovative sources of talent for employers. Partners with the State of Wisconsin, local government, public and private employment and training providers, and community- and faith-based organizations to provide employment services to these individuals, inside and outside of jails and prisons.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Reentry/Reentry.htm
Summer Jobs and Beyond / Career Plus	Provides local youth with career services, paid work experience, and access to in-school enrichment programming such as financial literacy, social-emotional learning, and STEM education.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Reentry/Summer-Job s-and-BeyondCareer-Plus.htm
TechHire	Serves young adults ages 17-29 with a high school degree or equivalent, with barriers to employment; incumbent workers, underemployed and long-term unemployed. Provides training and placement related to IT and IT-related industries.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Adult-Youth-Progra ms/TechHirehtm
Workforce Innovation and Opportunity Act (WIOA)	As the designated administrator of WIOA programs in Milwaukee County, Employ Milwaukee assists job seekers and workers who participate in WIOA; they are paired with a Career Planner and the program uses local Labor Market Information to work with local employers and ensure they are connected to a skilled workforce.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Reentry/Workforce-I nnovation-and-Opportunity-Act- WIOA.htm
WIOA Out-of-School Youth Program	This program offers individualized support to help 16- to 24-year-olds disconnected from work and/or school get back on the path to self-sufficiency through the development of job skills, and career pathway planning.	https://www.employmilwaukee. org/Employ-Milwaukee/Program sServices/Reentry/Youth-Progr am.htm

	I	I
YouthBuild	Prepares young adults for careers and	https://mccwi.org/
In partnership with	employment in the construction industry through	https://northcotthouse.org/ and
Milwaukee Christian	a focus on attaining a high school diploma and	https://www.employmilwaukee.
Center and Northcott	construction skills while receiving exposure and	org/Employ-Milwaukee/Program
Neighborhood House	access to employment in the construction trades.	sServices/Adult-Youth-Progra
	YouthBuild provides industry-recognized	ms/YouthBuild.htm
	construction credentials.	
OTHER INSTITUTIONS /	COMMUNITY-BASED ORGANIZATIONS	
Program	Role	Website
ArtWorks for Milwaukee	ArtWorks combines arts engagement with	https://www.artworksformilwau
	workforce development through intensive paid	kee.org/
	internships for teens throughout the year. Interns	
	benefit from career coaching provided by	
	ManpowerGroup.	
Center for	Provide family-strengthening programs to youth	https://centerinc.org/
Self-Sufficiency	and adults to assist them in developing healthy	
	life skills; offer job development and employment	
	services.	
Center for Veterans		https://www.cvivot.org/
	Employment-related services for veterans	https://www.cvivet.org/
Issues, Inc		
Goodwill Industries of	Programs and services offer community	https://www.goodwill.org/
Southeast Wisconsin	employment and job placement in seven	
	counties in the Greater Milwaukee area for	
	people 16 years or older and who have a	
	documented disability or barrier to employment.	
Milwaukee Area	Major educational institution and community	https://www.matc.edu/
Technical College	college; connecting residents to 170+ degree,	<u>ntepsi//www.natereau/</u>
Teermieur comege	diploma and certificate programs and	
	employment & training initiatives with local	
	employers.The Promise Program offers free	
	' '	
	tuition for eligible high school students and	
	returning adults.	
Milwaukee Job Corps	Education and career technical training program	https://milwaukee.jobcorps.gov/
	(authorized by the Workforce Investment Act of	
	1998); focused on connecting eligible young men	
	and women with the skills and educational	
	opportunities to establish careers.	
Milwaukee Reentry	Part of the Milwaukee Community Justice Council;	https://www.milwaukee.gov/EN/
Council	comprised of multi-sector entities and reentry	MCJC/hometostay
	advocates working together to better serve	
		_

	populations reentering the community from	
	periods of incarceration (both jail and prison). The "Home to Stay" program offers resources related to employment.	
Social Development Commission (SDC)	Community Action Agency for Milwaukee County; offers wraparound services plus job training, GED/HSED, ChefStart culinary training, Business Academy, etc.	https://www.cr-sdc.org/
The Commons	A program that partners with local companies and community organizations to create innovation experiences for young people in order to develop skills and build professional connections.	https://www.thecommonswi.co m/
Wisconsin Community Services	Offer adult employment and training services such as readiness classes, job placement/retention, case management, etc.; host the Center for Driver's License Recovery and Employability (CDLRE). Also provide Workforce Investment Act (WIA) services for eligible adult job seekers enrolled into the general employment services program.	https://www.wiscs.org/program s/comm/wo/
WRTP/BIG STEP	Customized training programs, pre-employment training certificate programs, in partnership with MATC and WCTC, for occupations, including carpentry, machining, welding, heavy highway construction, underground construction, and utility line construction.	https://wrtp.org
YWCA of Greater Milwaukee	Programs include employment readiness, adult education (GED/HSED) and personal financial management.	https://www.ywcasew.org/what-we-do/economic-empowerment
STATE OF WISCONSIN		
Program	Role	Website
Department of Corrections (DOC) and Department of Workforce Development (DWD)	Workforce development-related programs for inmates and offenders on probation or parole, from adult basic education and GED preparation to on-the-job training in several different industries. Resources via Wisconsin Job Center and multiple agencies/partners.	http://wisconsinjobcenter.org/e xo/

Department of	Services include counseling, training, job	https://dwd.wisconsin.gov/
Workforce Development	placement, and case management services for	
(DWD)	job seekers, with specific programs for veterans	
*Job Service	and individuals with mental or physical	
*Division of Vocational	disabilities; also provide training and technical	
Rehabilitation (DVR)	assistance to help employers navigate disability	
*WiscJobs for Vets	employment issues.	
Wisconsin Works (W-2)	Program under Temporary Assistance for Needy	https://dcf.wisconsin.gov/w2/pa
Department of Children	Families (TANF); provides employment	rents/w2
& Families (DCF)	preparation services, case management and cash	
	assistance to eligible families. Milwaukee County	
	agencies providing W-2 services are America	
	Works of Wisconsin, MAXIMUS, Ross Innovative	
	Employment Solutions and UMOS.	

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

In January of 2010 the City of Milwaukee adopted a Comprehensive Plan that consists of a Citywide Policy Plan and Area Plans. The Comprehensive Plan provides a guiding set of principles for which all City-related economic development plans follow. Additionally, the Milwaukee 7 (launched in 2005) was formed to create a regional, cooperative economic development platform for the seven counties of southeastern Wisconsin: Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington and Waukesha. Its mission is to attract, retain and grow diverse businesses and talent. The Milwaukee 7 Framework for Economic Growth leverages existing assets, like industry clusters, talent, ingenuity and entrepreneurship, and infrastructure and governance, outlining an array of potential new initiatives built around each.

Additionally, the Southeastern Wisconsin Regional Planning Commission (SEWRPC) works with Milwaukee 7 to prepare and update the CEDS for 2021-2025. This process brings together the public and private sectors to develop a strategic plan to diversify and strengthen the Region's economy. It also provides an understanding of ongoing economic development work, drawing heavily from the work of Milwaukee 7. The CEDS process meets Economic Development Administration (EDA) requirements for this work, which assists the region in securing Federal resources for economic development projects that benefit economically distressed areas.

In Fall 2020 SEWRPC hosted community input sessions with stakeholders. Presentations and input can be viewed at https://www.sewrpc.org/SEWRPC/communityassistance/Economic-Development/ceds.htm.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

In addition to the region's CEDS and Milwaukee 7 activities outlined above, there are a number of other published plans that aim to positively impact economic growth in Milwaukee, including the City of Milwaukee's Growing Prosperity Plan, the MKE United Greater Downtown Action Agenda, and the Metropolitan Milwaukee Association's CareerX program. Each plan is designed to improve the overall economic growth of the City and region. Additionally, the Department of City Development regularly updates Area Plans for Milwaukee neighborhoods, which often focus on key commercial corridors in the City.

City of Milwaukee Growing Prosperity Plan: Finalized in 2014-2015, this plan is centered within the context of the M7 Framework mentioned above but takes into account the City's unique economic attributes. The plan is tailored to specific conditions within the City and values held by its residents and business leaders. The plan's Action Agenda focuses on four areas: location-based opportunities, human capital development, entrepreneurship and innovation, and quality of life and place. Strategies were developed to capitalize upon strengths in each of these areas, and many have been, or are in the process of implementation, still guiding economic development work in the City. Half of the action items identified are led by departments within the City of Milwaukee, while the remaining actions utilize partnerships with businesses and nonprofits in the City. Learn more at https://city.milwaukee.gov/DCD/Planning/PlansStudies/Plans/GrowingProsperity.

MKE United Greater Downtown Action Agenda: Launched by the Greater Milwaukee Committee, City of Milwaukee, the Greater Milwaukee Foundation and the Milwaukee Urban League, MKE United's Action Agenda aims to ensure that the economic growth occurring in downtown Milwaukee due to new investment and developments reaches surrounding neighborhoods (the Greater Downtown) and the people who live there. The plan aims to create a Greater Downtown that is welcoming to all, including inclusive business, amenities and cultural offerings; a strong economic engine that attracts and retains inclusive and diverse businesses and jobs that grow household incomes; well connected to its neighborhoods and to the region, and positioned to attract new investment with a coherent and discernible "Greater Downtown" identity that will provide the necessary revenues to support a high quality of life for all. Learn more at https://www.mkeunited.com/the-action-agenda.

City of Milwaukee Area Plans: The Department of City Development (DCD) oversees and updates 14 Area Plans, which guide neighborhood development with land use, design, and catalytic project recommendations. Catalytic projects include residential, mixed-use, and commercial developments as well as transportation projects and open space recommendations. A current list of plans, a map/list of catalytic projects, and information on how residents and interested parties can get involved are posted on the City's website. Currently, one of the 14 Area Plans (Fond du Lac and North) is undergoing an update in coordination with Aldermanic, community organizations, and resident input and guidance. Learn more at https://city.milwaukee.gov/DCD/Planning/PlansStudies/AreaPlans#.XsLITxNKiqD.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

NA-15 (Disproportionately Greater Need Housing Problems and Cost Burden) provides detailed information and analysis on the concentration of housing problems. Overall, more households are experiencing 1 or more housing problems, with higher percentages at the lower income levels (0-50% AMI). As income increases, the need becomes more evenly spread across racial demographics; however, non-white households continue to be more disproportionately affected than the jurisdiction as a whole.

Additionally, according to U.S. Census data, Black householders paid out a higher proportion of family income for rental costs than did other renters, and make up 42% of those spending 30% to 50% of their income on housing and 51% of those spending over 50% of their income for housing. African-Americans are bearing a disproportionately greater cost burden for housing than other populations in Milwaukee.

While the City of Milwaukee has a very racially and ethnically diverse population, there are many neighborhoods that are highly segregated (particularly on the City's north side), and where more than 90% of residents are persons of color. Data You Can Use MKE Indicators project maps on the next page demonstrate the geographic segregation by race/Ethnicity [www.datayoucanuse.org/mke-indicators/]. These neighborhoods are also often the very same neighborhoods that have higher rates of extremely- to very-low income households and/or persons living in poverty.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Milwaukee is a City of 599,100 (estimated) people located within the greater Milwaukee Metropolitan Statistical Area (MMSA) which has a population of an estimated 1,576,236 people. There continues to be racial and ethnic concentrations both within the City of Milwaukee and in the MMSA. According to the U.S. Census there is a pattern of concentration of all minorities within the area generally considered to be the "central city." Most marked is the concentration of African Americans within the City limits and the fact that only 1.5% of the suburban population of the four-County Milwaukee Metropolitan Area is African American. The concentration still remains greatest for African Americans and has been noted by several local and national research studies.

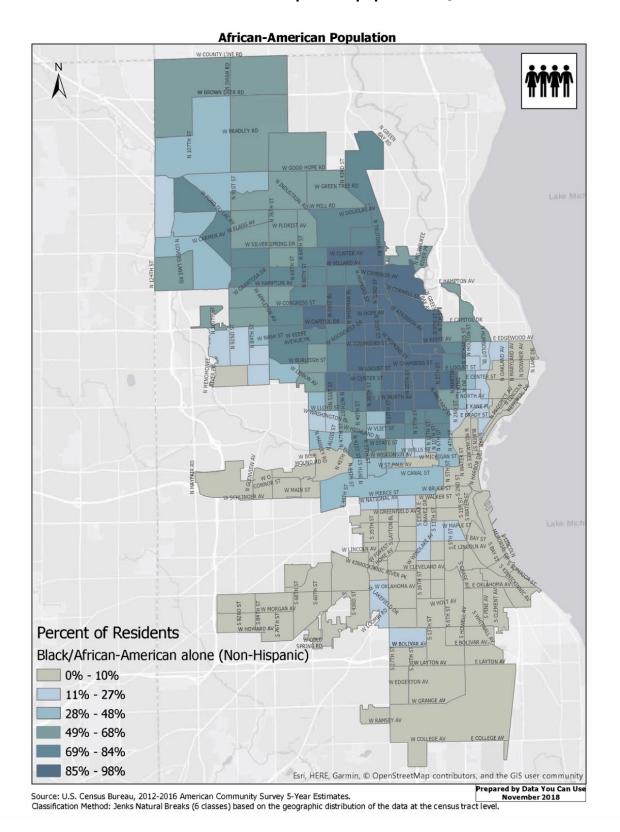
Very low income households are concentrated in Milwaukee's near north, west, far northwest and south side neighborhoods. Low income households dominate census tracts which are contiguous to Milwaukee central city areas. Higher incomes (moderate and above moderate) are found in the surrounding areas. These areas are not strictly contiguous; there are several individual tracts with a median income noticeably different than those surrounding.

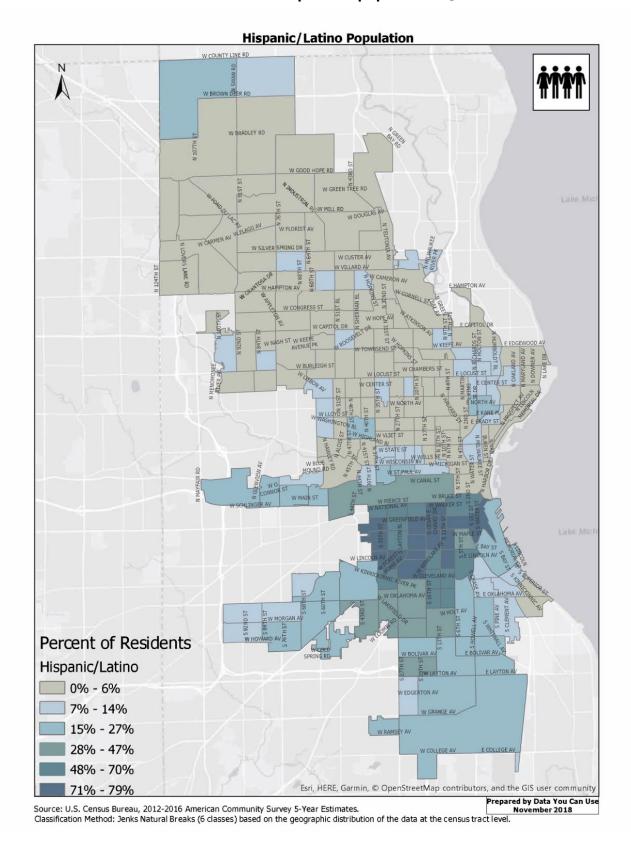
CDGA defines "areas of low income concentration", as those census tracts where at least 51% of persons are considered low-moderate income according to HUD's standards of 80% or less of the area median income.

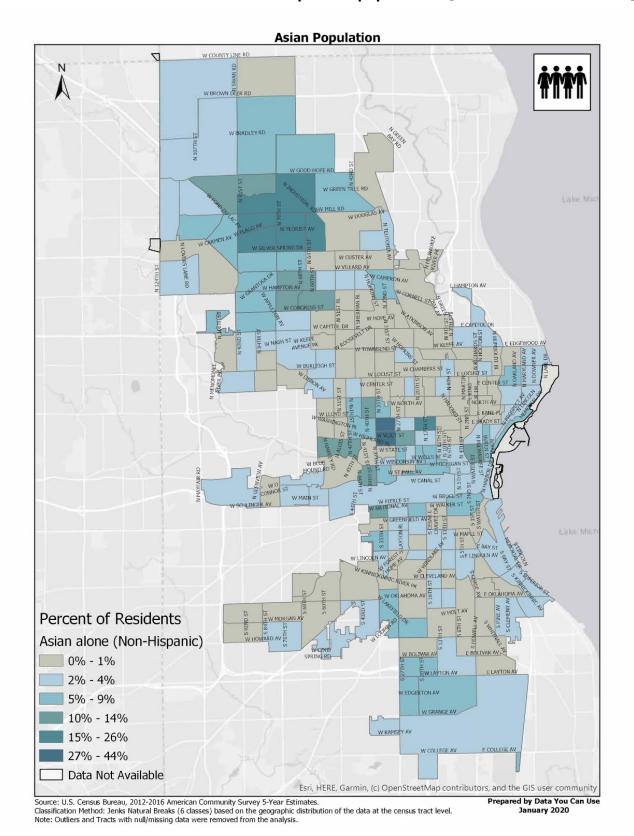
These areas are primarily the Neighborhood Revitalization Strategy Areas (NRSAs), which have been based on Year 2010 Census data and are described further in SP-10 (Geographic Priorities).

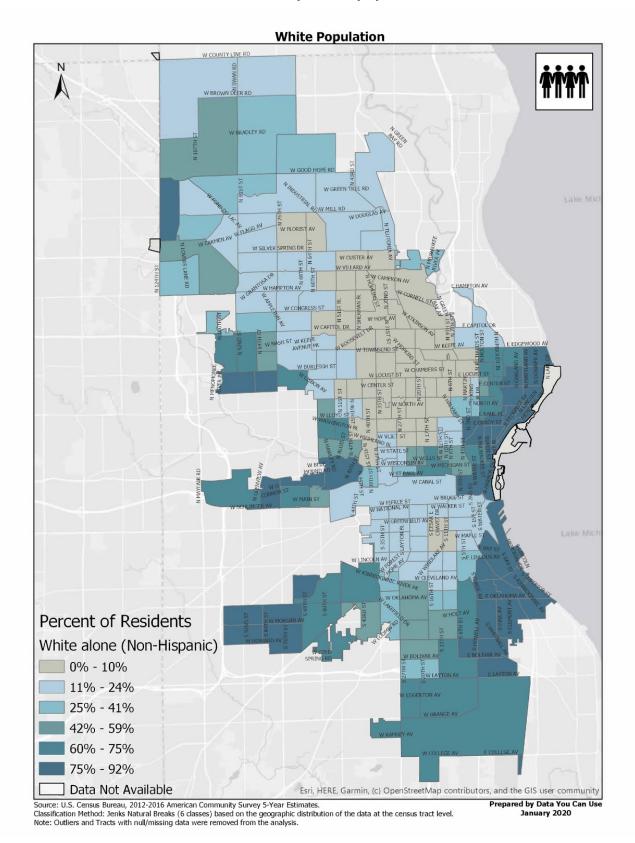
In each of the NRSAs, at least 80% of the total population falls within the HUD-defined low/moderate income category. There are however, other non-NRSA areas of low income concentration scattered throughout the City where at least 51% of persons are considered low-moderate income according to HUD's standards of 80% or less of the area median income. CDGA defines areas of minority concentration as those census tracts with a minority population of at least 51%.

The following pages include the MKE Indicators population maps, which visually show the concentration by race/Ethnicity in the City of Milwaukee.









What are the characteristics of the market in these areas/neighborhoods?

Mostly consist of low income areas with some areas experiencing high unemployment, poverty, and abandoned and foreclosed properties. These areas were generally the hardest hit by the foreclosure crisis, and have been the slowest to recover. Furthermore, these areas have seen a significant decrease in owner-occupied properties and an increase of landlords who live outside the City and the state.

Are there any community assets in these areas/neighborhoods?

These areas have numerous assets, despite the challenges described above related to higher poverty rates and the effects of the foreclosure crisis (i.e. decline in property values and owner-occupancy) such as:

- Active, committed residents, businesses and institutions
- Strong community-based organizations serving these areas
- Rich racial and ethnic diversity of residents
- Reliable access to public transportation
- High homeownership rates in some areas
- Dynamic neighborhood commercial districts and Business improvement Districts (BIDs)
- Increasing number of Neighborhood Improvement Districts (NIDs)
- Improvements and new uses added to parks, community gardens and other public spaces
- Easy access to the Interstate system; Downtown, Menomonee Valley, and 30th Street Industrial Corridor
- Well-established schools and churches
- Innovative redevelopment of city library branches, including affordable housing and new resources
- Increasing levels of homeowner investment in some areas
- Historic homes being renovated in some areas
- Vibrant cultural activities such as neighborhood festivals and community events
- Active "buy local" campaigns and other tools that promote black- and brown-owned businesses and leverage local purchasing power
- Continued modernization of public housing developments such as Hillside, Westlawn and Carver Homes, adding new community partnerships and assets

Are there other strategic opportunities in any of these areas?

Below is a list of corridors, developments, businesses, institutions and other assets in different areas of the City (by no means complete, but fairly comprehensive):

Northside - Central

- Near North Side Plan update underway with City DCD and community partners
- 30th Street Industrial Corridor/Tower Automotive/Century City Business Park large scale industrial redevelopment site (in progress)
- Sherman Phoenix
- W. Fond du Lac & W. North Avenue commercial corridor
- Walnut Way Wellness Commons (two phases)

- Fondy Food Center and Fondy Park
- Johnson Park redevelopment
- Alice's Garden
- W. Capitol Drive, Locust Street, Center Street commercial & mixed-use corridor
- W. North Avenue Gateway
- Wisconsin Black Historical Society/Museum
- Active community-based organizations such as Dominican Center, Metcalfe Park Community Bridges,
 Sherman Park Community Association
- Progressive Community Health Center
- New affordable housing developments such as Teutonia Gardens, Meadow Village, etc.
- Capitol Stampings
- St. Ann's Intergenerational Campus

Northeast Side

- Bronzeville Cultural & Entertainment District
- HomeWorks: Bronzeville (artist/housing/workspace development)
- Historic King Drive Commercial Corridor and BID
- W. Atkinson-Capitol-Teutonia (ACT) Triangle
- E. Capitol Drive commercial corridor
- Brewer's Hill historic homes, bordering Beerline development
- America's Black Holocaust Museum (new mixed-use development)
- Pete's Food Market on King Drive & North Avenue
- Community Warehouse on North Avenue
- King Drive Library slated for redevelopment
- St. Marcus Lutheran school campus
- Milwaukee Health Services (community health center)
- Pabst redevelopment site (includes new commercial spaces, breweries, NO studios, affordable housing)
- Bader Philanthropies (new headquarters on King Drive in the Harambee Neighborhood)

Northwest Side

- New library developments (Villard Avenue and Mill Road/Good Hope)
- Close & accessible retail shopping
- Goodwill Industries HQ and Training Center
- Also adjacent to 30th Street Industrial Corridor/Century City redevelopment
- Power, energy, controls automation "asset" clustering at former Eaton tower
- Active community organizations such as Northwest Side Community Development Corporation (CDFI
 and community-based organization), Havenwoods Economic Development Corp. (BID and landlord
 compact), and Silver Spring Neighborhood Center
- Choice Neighborhood Initiative (HACM/Westlawn Gardens + community partners)
- Expanded and redesigned HQ of Direct Supply (international manufacturer)
- Presence of larger employers in industrial areas in the Havenwoods and Granville areas

Near West Side

- Connection to Menomonee Valley (access to jobs and recreational amenities such as the Hank Aaron State Trail extension, Mitchell Park Domes, Urban Ecology Center)
- Community-based organization such as Near West Side Partners (formal partnerships with area institutions), Milwaukee Center for Independence, City on a Hill
- N. 27th Street & W. Wisconsin Avenue commercial corridor
- N. 35th Street & W. Wisconsin Avenue commercial corridor
- Indian Community School Redevelopment W. State Street & N. 33rd Street
- Transit-oriented and affordable housing developments at N. 35th Street & W. Wisconsin Avenue
- Event venues such as Tripoli Shrine Center and The Rave
- Large corporations/employers such as Miller Brewing Company, Harley Davidson, Marquette University and Aurora Sinai Hospital

Near South Side

- Connection to Menomonee Valley (access to jobs and recreational amenities such as the Hank Aaron State Trail extension, Mitchell Park Domes, Urban Ecology Center)
- Large employers such as Rockwell Automation, CH Coakley, AdvocateAurora Health, new headquarters of Komatsu
- Harbor District redevelopment
- Commercial districts such as Historic Mitchell Street, S. Cesar Chavez Drive, Lincoln Village/W. Lincoln Avenue, Walkers Point/S. 2nd Street/5th & 6th Streets (food & beverage district)
- Iron Horse Hotel and Great Lakes Distillery
- Sixteenth Street Community Health Center
- Walkers Point cultural, arts & entertainment district (near W. National Avenue)
- Clock Shadow Creamery and Core El Centro
- Community-based organizations such as Clarke Square Neighborhood Initiative, IndependenceFirst, Journey House, VIA CDC
- La Causa Charter School and community center; St. Augustine Preparatory Academy
- Great Lakes WATER Institute (water technology "asset" clustering around 1st & Greenfield)
- Potawatomi Casino and Hotel expansion
- Harley Davidson Museum
- Global Water Center

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Community Development Grants Administration (CDGA), housing, and community development strategy focuses on creating viable, resilient, and equitable neighborhoods; high-quality, affordable housing; and economic opportunity for all residents. Housing is at the center of healthy communities that include public safety, education, employment opportunities, business development, and social service providers. These priorities recognize the interconnected nature of the needs and services required to create and support a thriving city.

To achieve these goals, CDGA will continue to focus on improving the availability of quality, affordable housing units, promoting economic opportunity, preventing homelessness, and serving populations with special needs. CDGA, in concert with several City departments and a diverse group of stakeholders, will work to reduce barriers to affordable housing. Our staff also work in tandem with Continuum of Care efforts to reduce time in shelters, and prevent and end homelessness. Staff with the Health Department and Department of Neighborhood Services implement best practices to remediate lead-based paint hazards while providing care for those who have lead exposure. Finally, CDGA, with its more than ninety (90) sub-grantees and community partners, continues a broad-based, systematic approach to anti-poverty programs and services, while adding the various effects created by the COVID-19 public health pandemic and 'Safer at Home' orders.

Summary of Needs

The following is a high-level summary of needs, which were described in detail in the Needs Assessment and are summarized further in SP-25 (Summary of Priority Needs):

- 1. Increase affordable housing units (owner-occupied, rental-rehab, & new construction)
- 2. Improve housing quality (code enforcement, home repair & rehabilitation)
- 3. Address public health concerns (including anti-violence programs and factors related to COVID-19)
- 4. Support housing accessibility & modifications
- 5. Abate and/or prevent lead-based hazards
- 6. Address problem properties via demolition, clearance & remediation
- 7. Support employment, job training and workforce services
- 8. Assistance to small businesses and entrepreneurs (i.e. technical, capital, financial education)
- 9. Provide education and services to homebuyers and homeowners (i.e. counseling, assistance with housing costs, downpayment)
- 10. Provide youth services (i.e. mentoring, prevention & intervention programs, financial education, work experience)
- 11. Support community organizing and crime prevention activities
- 12. Access to healthcare and wellness services
- 13. Services for people who are experiencing homelessness
- 14. Enforce and provide education on fair housing rules & regulations
- 15. Provide planning & technical assistance to community-based organizations and other partners

Market Conditions

The following is a list of key market conditions reviewed in this Consolidated Plan and affect efforts to address community needs and are summarized further in SP-30 (Influence of Market Conditions):

- 1. Stagnant and/or declining household incomes
- 2. Loss of jobs in higher-paying sectors
- 3. Production of new housing units
- 4. Rehabilitation of existing housing units
- 5. Acquisition and preservation of affordable housing units
- 6. Increasing market-rate rents
- 7. Threats of gentrification and displacement
- 8. Persistent racial segregation, limiting economic opportunity
- 9. Impact of Federal and State policy
- 10. Economic and racial disparity impacts of COVID-19

The city's **Economic and Community Development Strategy** complements the strategy areas summarized below and in greater detail in other sections in this plan by emphasizing how interconnected employment, access to economic opportunity, and affordable housing are to each other. In terms of resources and implementation, Milwaukee will continue its commitment to cluster-based and large impact developments, along with leveraging strategic partnerships across city departments, with funders, and with community-based organizations.

The city devotes significant resources to expand the creation of affordable housing through the provision of city financial resources, city land, and policy actions. The **Housing Strategy** will leverage the infrastructure of the City's Strong Neighborhoods program, Housing Trust Fund, Housing Authority of the City of Milwaukee (HACM), and public-private partnerships to expand the availability of of affordable rental housing, increase homeownership opportunities, eliminate blight, rehabilitate units for owner-occupancy, provide home maintenance and repair assistance, prevent eviction and improve housing stability.

The city and its partners have undertaken significant efforts to plan for and develop affordable housing in recent years. The city's Comprehensive Plan, Housing Affordability Report, Anti-Displacement Plan, Strong Neighborhoods Plan, Consolidated Plan for Federal Funding, and Mayor Tom Barrett's 10,000 Homes Initiative have all analyzed housing-related data and made recommendations for increasing the supply of affordable housing within the City of Milwaukee. These efforts have been complemented by outside research such as the Analysis of Impediments to Fair Housing, and policy analysis carried out by the Wisconsin Policy Forum and other groups.

The Strategic Plan also includes specific sections for the following areas:

Public Housing Accessibility and Involvement (SP-50)

HACM is committed to improving the accessibility of public housing and providing enhanced services to public housing residents. Efforts include assisting public housing and Section 8 residents to move to private market unsubsidized housing and/or relocate to other communities outside the City; working towards homeownership; accessing employment training or job readiness assistance; supportive services; increased accessibility for people with disabilities; and transportation services for public housing residents. Residents

are directly involved in the evaluation of various program outcomes and in the determination of the level of satisfaction with facilities and services offered by HACM.

Barriers to Affordable Housing (SP-55)

The following strategies are designed to leverage both existing city programs and emerging community-based efforts to increase affordability and access to safe, affordable housing: Increase owner-occupied housing; Rehabilitate owner-occupied housing; Expand availability and rehabilitation of rental housing to preserve affordability; and Increase resources for and access to tenant-based rental assistance. Additionally, the City is committed to utilizing the available tools to provide oversight and accountability on fair housing issues and improve alignment amongst policies and programming.

Homelessness Strategy (SP-60)

The city will continue its active support of, and partnership with Milwaukee's Continuum of Care (CoC) to implement the following strategies: Prevent homelessness and increase outreach; Assess and adapt emergency shelter and transitional housing to meet shifting needs; Secure safe shelter sooner (via Rapid Re-Housing); Transition to permanent housing; Shorten the duration of homelessness; and Strengthen connections with service providers that work with special needs populations.

For a long time homeless systems have operated more from a "downriver" perspective and extended beyond capabilities to help those most in need while leaving few resources for prevention. The Milwaukee CoC continues to focus on new strategies that can seamlessly deliver help and support "upstream" before homelessness actually occurs. Three systemic considerations are:

- 1. Information sharing about homelessness prevention services that can activate support in other institutions and networks must occur sooner to prevent homeless episodes. Major helping institutions, neighborhood organizations, and the community at large often regard homelessness as a unique problem that can only be addressed by homeless service providers. In other words, homelessness is 'segregated' from issues related to poverty, unemployment, and housing affordability. A perspective that is too common is that there are poor people and then there are people who are homeless; they are seen as distinct and separate populations, which is not the case.
- 2. Systemic issues that can lead to an episode of homelessness are widely known but not addressed. Poverty, low wages, high housing costs, and access to health care and mental health/addiction treatment are generally recognized as root causes. However, they are too large and overwhelming to be tackled solely by the homeless services system.
- 3. The homeless services system tends to operate as an insular system. This often means it tries to solve problems in which it has no expertise, such as employment and mental health, instead of engaging major institutions, other systems (i.e. workforce, health care), neighborhood organizations, and the community to take responsibility for appropriate portions of the problem. A recent example of where this has shifted in efforts to address the impact of evictions in Milwaukee. This has created new connections among homeless service providers, housing advocates, legal and mediation services, and the justice system all around a framework that is focused on prevention and the rental housing ecosystem.

Lastly, the impacts of the COVID-19 public health pandemic on the CoC and system of homeless service providers cannot be overstated. Core to the safety mantra of the community during the pandemic that we are *Safer at Home*, safer at home sadly is not possible for more than 11,000 Milwaukee residents. Limitations on shelter capacity, more street homelessness, and shifts in how services are delivered have been challenging but have also led to innovative approaches to providing safe shelter and connecting people to housing navigation and supportive services. A lot has been learned within Milwaukee's CoC and the homeless system that can be applied to the strategies outlined in the Consolidated Plan.

Lead-Based Paint Hazards (SP-65)

The impact of lead-based paint hazards are a continued focus and concern for the City especially given the age of Milwaukee's housing stock. Strategies include: Ensure compliance with HUD Lead Safe Housing Rule and EPA Renovation Repair and Painting rules; Remediate lead-based paint hazards; Diversify and increase funding to make homes lead-safe before children are experience lead poisoning; Investigate and provide case management to lead-poisoned children and their families; Collaborate with other City agencies (DCD and DNS) to increase lead-safe housing options; Partner with community agencies to produce lead-safe housing units in high-risk target areas; Involve community leaders and members in areas that are most affected by lead hazards; and Increase awareness of the importance of lead testing of children before age three.

Anti-Poverty Strategy (SP-70)

The anti-poverty strategies fall within four areas: Economic opportunity, Transportation, Housing, and Quality of life. This holistic approach is taken out of a recognition that poverty is systemic, and solutions should cut across sectors and issue areas. Specific strategies focus on workforce development services, training in skilled trades and other sectors that offer livable wages; small businesses assistance to strengthen job retention, access to capital, and generate growth; access to civil legal services and financial education; programs that provide support to people with disabilities; expansion of public transit and other transportation options; affordable homeownership opportunities that help people build wealth; protections for tenants and efforts to prevent eviction and increase housing stability; increased access to home repair and energy efficiency funds; youth engagement and services; resident leadership and community organizing programs; violence prevention initiatives; access to community-based health services; and maintenance/improvement of public spaces.

New Opportunities & Challenges

Health & Housing

The social determinants of health have become an increased focus of health care systems and providers. Hospitals, community clinics, and other health care providers, see in their daily practice the ways that housing conditions affect the well-being of their patients and communities. In response, health care providers have begun to take a more active role in connecting clients to housing services and by directly investing in housing and community development activities. Hospitals often act as anchor institutions within cities, and improving housing can both address the root causes of the health problems health care systems seek to try while also improving their connections to the communities they serve. Identifying and pursuing strategies that link

housing and health could bring new resources in efforts to improve access to safe, affordable housing in Milwaukee.

The COVID-19 Pandemic and Community Planning

The 2020 Covid-19 is a complex challenge, and its effects are just beginning to emerge in all areas of concern for this Consolidated Plan. While much remains unknown, unemployment has already risen significantly, child care services and schools have been closed forcing parents to juggle work and child care responsibilities, and many small businesses have seen their revenue disappear as lockdowns have been implemented and fear keeps customers away. The expectation is that these stressors will only exacerbate the housing, education, economic, and social challenges facing Milwaukee's most vulnerable communities.

Additionally, the City early on began tracking COVID-19 infections through the use of disaggregated data, and early on identified the disparate impact the coronavirus is having on communities of color. The Health Department's website also tracks infections by Aldermanic District, which shows an overlap and connection to the areas of the City with a higher proportion of Black and Hispanic/Latino residents.

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[https://public.tableau.com/profile/rachel.mukai#!/vizhome/AldermanicDistrictsTableauDashboardUpdate/AldDashboard]

As discussed in other sections of the Consolidated Plan, these racial disparities also extend to the economic impact of COVID-19, with a higher proportion of Black and Brown residents employed in the sectors hardest hit and losing work/income, at risk for housing instability, a lack of capital for small business owners, and having access to health care services. The disparity in the City of Milwaukee is clear. Responses to these challenges are under development with the understanding that it will take far longer to achieve both stability and recovery to pre-pandemic levels. Finally, COVID-19 has made it apparent that all aspects of city planning also need to review, assess and update strategies related to resilience and disaster response.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

The geographic distribution for these entitlement funds, except for HOPWA funds, is the Community Development Block Grant Target area, including two (2) Neighborhood Revitalization Strategy Areas (NRSAs). The HOPWA funds cover the four-County Milwaukee Metropolitan Statistical Area is comprised of: Milwaukee, Waukesha, Ozaukee, and Washington counties.

General Allocation Priorities

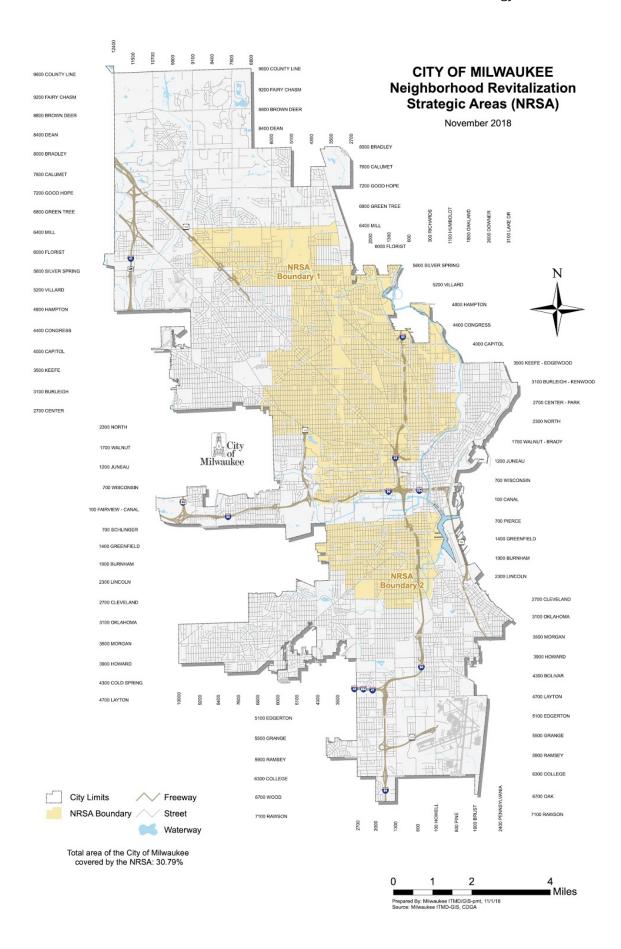
Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

	Neighborhood Revitalization Strategy Areas (NRSA) CENSUS TRACTS
NRSA #1	11,12,13,14,15,19, 20,21,22,23,24,25,26,27,28,37,38,39,40, 41,42,43, 44,45, 46, 47,48,49,50,59,60,61,62,63,64,65,66,67, 68, 69,70,79,80,81,84, 85, 86, 87, 88,89, 90, 91,92,93,96,97,98,99,106, 107,122, 123,133,134,135,136,137, 141, 146,147,148,149,1854,1855,1856,1857,1858,1859,1860,1861,1862,1864
NRSA #2	157,158,159,160,161,162,163,164,165,166,167,168,169,170, 171,173,174,175,176,186,187,188,1865,1866

NRSA Requirements

To receive the designation by HUD, the municipality must include the following in a NRSA application to HUD:

- 1. **Boundaries:** Identify the neighborhood's boundaries. All of the boundaries must be contiguous.
- 2. **Demographic criteria:** Demonstrate that the selected area is primarily residential and contains a high percentage of low and moderate-income persons. The threshold is usually 70 percent but maybe as low as 51 percent.
- 3. **Consultation:** Describe how the strategy was developed with consultation of the area's stakeholders, including residents, businesses, financial institutions, community groups, and others that serve the neighborhood.
- 4. **Assessment:** Assess the economic conditions of the area and examine the potential opportunities and problems likely to be encountered.
- 5. **Economic Empowerment:** Develop a realistic strategy and implementation plan to promote the area's economic progress, create meaningful jobs for low and moderate-income residents, and promote revitalization.
- 6. **Performance Measurements:** Identify the results expected to be achieved in measurable benchmarks.



Defining the NRSAs

The city's approach to defining the geographic priorities included the following methodology described below, and was updated by the Department of City Development using 2018 American Community Survey data.

- 1. Two Neighborhood Revitalization Strategy Areas (NRSAs) were identified in the 2014-2019 Consolidated Plan using 2010 Census data.
- 2. These areas have the highest number of low-income persons in the City of Milwaukee.
- 3. In each, at least 70% of the total population falls within the HUD-defined low/moderate-income category.
- 4. Low-income households dominate census tracts and are contiguous to central city areas.
- 5. Higher incomes (moderate and above) are found in the surrounding areas, but are not contiguous. There are several individual tracts with a median income noticeably different than those surrounding.
- 6. An important thing to note about the NRSAs is that having these identified in such a way means that the City is allowed to exceed the cap on public services spending (15%), which the City does.

Average Median Income		
NRSA 1	NRSA 2	Milwaukee-Waukesha-West Allis, WI
\$ 28,286.05	\$ 30,977.46	\$ 83,800.00

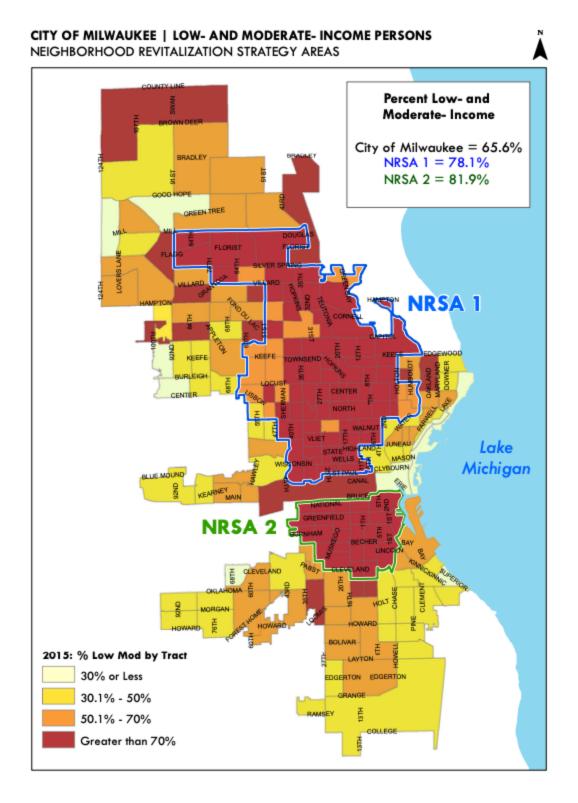
Data Source: 2018 American Community Survey CS 5-Year data

Low Income Households	NRSA 1	NRSA 2
Total Households	70,614	23,762
Low/Moderate Income Households (\$74,999 or less)	61,227	20,844
%	86.7%	87.7%

Data Source: 2018 American Community Survey CS 5-Year data

As the map on the following page illustrates, there is a concentration of low and very low income households on the near North, West, Northwest, and South side neighborhoods. Additionally this data has a strong overlap with the concentration by race/Ethnicity in the City of Milwaukee (refer to MA-50 for MKE Indicators maps). Milwaukee's persistent residential segregation has been studied for decades by local and national researchers and policymakers, noting the tremendous gaps between white and non-white populations when it comes to median household income, educational attainment, household wealth, etc. This overlay of economic segregation impacts employment and other opportunities for people of color in Milwaukee.

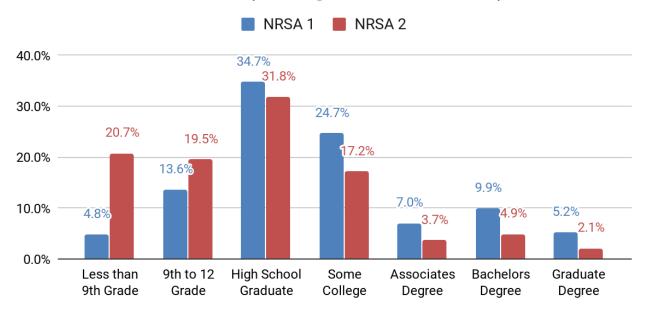
CDGA proposes to target funding to areas with the greatest need, the Neighborhood Revitalization Strategy Areas (NRSAs). As the tables above show, in each of the NRSA's over 70% of the total population falls within the HUD-defined low- to moderate-income category. Funding is also allocated for low-income persons in the non-NRSA census tracts within the City of Milwaukee. The emphasis is on targeting resources to support neighborhood revitalization efforts that integrate housing, economic development and public services in these geographic areas though clear development strategies.



Source: HUD FY 2020 CDBG Low Mod Income Summary Data (Based on the 2011-2015 ACS)

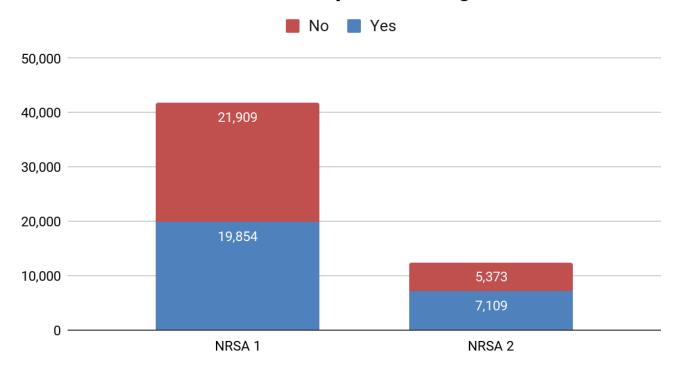
Additional Demographics in the NRSA areas:

Education (Among those 25 & Older)



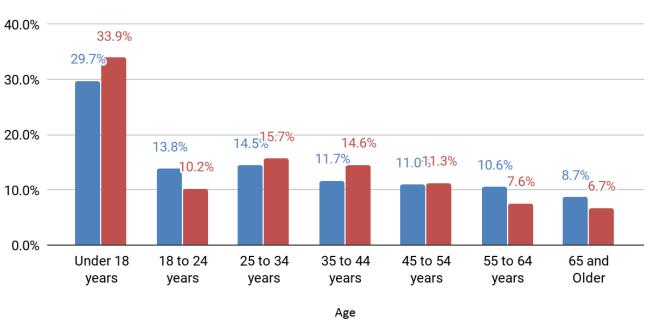
Education (Among those 25 & Older)

Owner Occupied Housing

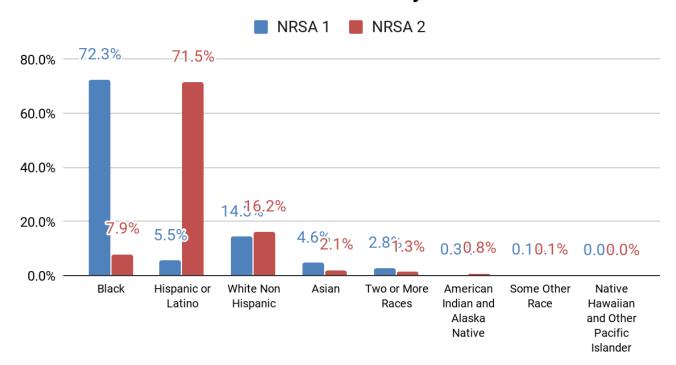


Age Distribution





Race & Ethnicity



SP-25 Priority Needs - 91.215(a)(2)

The following table summarizes each priority need area, identifying the target population, and corresponding HUD statutory program goals: 1) Decent Housing; 2) Suitable Living Environment; and 3) Expand Economic Opportunity.

Table 53 - Priority Needs Summary

Priority Needs	Target Population	Goals Addressing
Affordable Housing (owner-occupied, rental rehabilitation, & new construction; includes CHDO & CHDO Operating funds)	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities	Decent Housing Suitable Living Environment (Increase access to safe, affordable owner-occupied and rental housing)
Improve Housing Quality (code enforcement, home repair & rehabilitation)	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities	Decent Housing Suitable Living Environment (Increase access to safe, affordable housing)
Address Public Health Concerns (including access to healthcare and wellness services, anti-violence programs, and factors related to COVID-19)	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities COVID-19 impacted residents	Suitable Living Environment Expand Economic Opportunity
Support Housing Accessibility & Modifications	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities	Decent Housing Suitable Living Environment (Availability/Accessibility; improve access to safe, affordable housing)
Abate and/or Prevent Lead-Based Hazards	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities	Decent Housing Suitable Living Environment (Increase access to safe, affordable housing)
Address Problem Properties (demolition, clearance & remediation)	Extremely Low Low/Moderate Income Large families	Decent Housing Suitable Living Environment

	Families with children Elderly Persons with Disabilities	(Increase access to safe, affordable housing)
Special Economic Development - Assistance to small businesses and entrepreneurs	Extremely low Low/Moderate Income	Expand Economic Opportunity Suitable Living Environment (Increase access to services)
Provide Education and Services to Homebuyers and Homeowners	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities	Expand Economic Opportunity Decent Housing Suitable Living Environment (Increase access to safe, affordable housing)
Public Services - Youth Services	Extremely Low Low/Moderate Income Youth	Expand Economic Opportunity Suitable Living Environment (Increase access to services)
Public Services - Employment Services	Extremely Low Low/Moderate Income	Expand Economic Opportunity Suitable Living Environment (Increase access to services)
Public Services - Neighborhood Strategic Planning/Community Organizing/Crime prevention	Residents, businesses and other stakeholders in the NSP areas	Suitable Living Environment (Engage stakeholders in community improvement efforts)
Public Services - Homeless Services	Extremely Low Low/Moderate Income Large families Families with children Elderly Persons with Disabilities	Decent Housing Suitable Living Environment Expand Economic Opportunity (Availability/Accessibility; housing stability and independence)
Fair Housing	City of Milwaukee Jurisdiction	Decent Housing Suitable Living Environment Expand Economic Opportunity (Fair housing enforcement and public education)
Planning	City of Milwaukee Jurisdiction	Decent Housing Suitable Living Environment Expand Economic Opportunity (Goal setting/strategy development)

Administration	City of Milwaukee Jurisdiction	Oversight of all funded activities
Planning - Technical Assistance & Capacity Building for Nonprofits	Federal funds administered by	Technical assistance; improved organizational strength and capacity

The following narrative is included for additional context in the Consolidated Plan and support the potential for other Federal resources that could be secured to help address them.

Narrative (Optional)

The Community Input process also generated a significant amount of feedback from residents, service providers, funders, and other stakeholders that provide guidance on strategies particularly related to areas that generally fall under Public Services and Anti-Poverty. These needs were described in greater detail in NA-50 (Non-Housing Community Development Needs) and are summarized below.

YOUTH SERVICES

Consolidated Plan Strategic Plan Goal: Improve the lives of youth through prevention and intervention programs that are widely accessible to youth, and programs which provide education, work experience, and life skills development.

In the Community Survey, the highest-ranking public service need was youth activities and youth employment. About 38% of survey respondents named Youth Activities as the most important public services issue and over 70% of all respondents ranked it as a first or second priority in terms of investment. Focus group sessions also provided more detail and context to the needs of youth.

What Works

- Consistent, safe spaces for youth to access programming, recreation, and other wraparound services (i.e. leverage the community centers and public spaces/parks we have already).
- Programs that offer skill-building opportunities with real-world application (life skills, communication, financial literacy, wealth-building).
- Work experience or youth internship programs such as Earn & Learn.
- Programs that engage youth over long periods of time and "meet people where they are."
- Youth-engaging-youth model (hiring youth to be part of program design and implementation).
- Integrating trauma-informed practices into youth programs.
- A centralized place for them to find those programs and resources.

Implementation Strategies

- Provide job readiness, vocational training and extra-curricular skill-building opportunities (including financial literacy) for youth and young adults ages 18-24 to provide them with real work experiences and connections to area employers.
- Connect at-risk youth with housing assistance programs, particularly on unaccompanied youth, those facing instability or homelessness, aging out of foster care, etc.
- Support prevention/intervention programs for at-risk youth to help decrease youth violence, develop self-esteem, learn goal setting and attainment skills, and provide safe spaces for LGBTQ youth.
- Support neighborhood-based programs for youth, which increase their ability to access services such as tutoring, mentoring, teen pregnancy prevention, safe havens, recreation.
- Support programs that integrate trauma-informed practices in youth services.
- Provide opportunities for civic engagement and leadership in the community.

PUBLIC SAFETY, COMMUNITY ORGANIZING & CRIME PREVENTION

Consolidated Plan Strategic Goal: Promote a suitable living environment through public safety initiatives, community organizing and other efforts that engage residents and help them access resources and build relationships with law enforcement to reduce crime, fear and disorder (which hinder community development).

Crime and/or perception of crime and neighborhood safety continues to be a dominant concern for residents. Issues such as crime prevention, reckless driving mitigation, and neighborhood improvement initiatives such as community organizers or neighborhood ambassadors were all mentioned frequently in the community survey.

In 2017 the City of Milwaukee Health Department Office of Violence Prevention released the "Blueprint for Peace" - an action plan that addresses the root causes of violence with a public health approach intended to complement traditional criminal justice-based public safety strategies. A number of strategies in the Blueprint for Peace are built around connecting residents to resources to meet basic needs, creating safe and accessible community spaces, organizing community events to foster neighborhood connections, and other community-building activities.

Community organizing agencies collectively build and enhance neighborhood networks through regular public meetings, door-to-door outreach, social media engagement, and other efforts that leverage strategic public and private investment. Organizers seek in-depth knowledge that they can share with residents, particularly around navigating city government processes and resources. They are critical connectors in neighborhoods, particularly for other specific community issues such as employment, housing, youth activities, civic engagement, etc.

The COVID-19 pandemic has altered how this work traditionally occurs, and community organizers and neighborhood groups are pivoting their engagement, finding new successes in reaching residents through a combination of the "tried and true" methods of door-to-door, personal contacts and the use of technology.

Implementation Strategies

- Support the use of data-driven crime prevention strategies that utilize neighborhood networks, increase resident participation and improve police-community relationships.
- Maintain the Community Prosecution Unit (CPU) at the police district level to work with neighborhood organizers and residents.
- Support efforts to offer training and capacity-building opportunities for individuals and organizations to better understand violence prevention practices.
- Engage residents and groups in activities that promote neighborhood pride, improve quality of life, and connect them to resources (clean-ups, graffiti abatement, housing improvement, forums, etc.)
- Preserve the development and support of neighborhood block watches, which directly connect to other efforts such as engaging small businesses in community safety, landlord compacts, civic engagement and leadership training.
- Utilize the community organizing network to draw upon key neighborhood connectors when the City engages in area planning and seeks community input/feedback as new development is proposed.

ENVIRONMENTAL & HEALTH ISSUES

Consolidated Plan Strategic Goal: Protect the public health and safety of city residents through the reduction of adverse environmental exposures associated with city properties such as underdeveloped brownfields. Increase the economic value associated with the redevelopment of brownfield and resulting increases in city-located business, jobs, and increased commercial property tax levy.

The City of Milwaukee has a few key areas that connect both environment and health to public service needs. Substandard housing can have a detrimental impact on people's health and some parts of the City also experience larger impacts related to disaster and/or other environmental conditions. Increased access to public transportation can help reduce traffic congestion, increase walkability, and improve air quality.

The Environmental Planning and Review Program is a high priority for the City in order to protect residents from identified and unidentified environmental hazards. This includes providing environmental review in compliance with HUD 24 CFR Part 58 for numerous city and city-assisted projects, and support for the investigation and remediation of contaminated properties. Additionally this program provides technical guidance on a range of environmental and public health issues to other city departments such as Health, City Development, Neighborhood Services, City Attorney, City Treasurer, Redevelopment Authority, Housing Authority, Public Works, Milwaukee Economic Development Corporation (MEDC) and the Port of Milwaukee. The program works with state and federal agencies, as well as private entities such as developers, attorneys, architects, engineers, and consulting firms to limit community exposure to environmental hazards and associated public health risks.

Long-term racial inequality also led Milwaukee County to declare racism as a public health crisis in May 2019, citing that the local government has a significant role to play in engaging all residents in racial justice work. The City of Milwaukee soon followed suit, with the Common Council passing a similar resolution in July 2019.

Currently, the City of Milwaukee is seeing racial disparities play out in real-time as African Americans are three times as likely to die from COVID-19 than white residents.

What's Needed

- Address public health concerns (including factors related to COVID-19 and anti-violence programs).
- Inspect properties for environmental conditions that may pose hazards to residents.
- Coordinate/prepare CDBG planning reviews as required by HUD 24 CFR Part 58 to complete the "Release of Federal Funds" forms.
- Prepare CDBG Environmental Impact Assessments annually for local agencies and community groups as required by HUD 24 CFR Part 58 to complete the "Release of Federal Funds" forms.
- Screen tax-delinquent properties for possible foreclosure and to avoid environmental liability.
- Assist local HUD staff in conducting environmental reviews through HUD's 24 CFR Part 50 requirements.
- Support disaster recovery efforts.

A Note on Strategies Related to the Impact of COVID-19:

Public, nonprofit and private entities are working together to increase the capacity of agencies and programs on the front line of the pandemic, and complement the ongoing work of public health experts. The need for investments in facilities, PPE, cleaning supplies and increased maintenance of public facilities to support safe public health practices will have renewed focus. Long-term economic and social disruptions are expected to cause extreme hardships for a broad swath of City of Milwaukee residents, exacerbate many of the needs discussed throughout this Consolidated Plan, and require sustained investment in strategies that support long-term recovery.

While the federal government is providing much-needed support to state and local government, as well as direct support to residents and business owners, the economic need is still significant. It is likely that many of the community-response programs that have launched will continue to see a demand for support that exceeds their capacity.

The city will continue to work with the MKE Civic Response Team, a philanthropic coalition that formed immediately in the aftermath of public health restrictions and shutdowns. Not only have they announced significant contributions specifically for COVID-19 related impacts through the "MKE Responds" fund, but continue to coordinate the community response to the COVID-19 pandemic, working closely with the City of Milwaukee and a diverse array of community-based stakeholders in the following areas: 1) Early Childhood Education; 2) Economic Recovery; 3) Food Security; 4) K-12 Education; 5) Mental Health; 6) Physical Health; and 7) Shelter/Housing.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

The City of Milwaukee and its partners have undertaken significant efforts to plan for and develop affordable housing in recent years. The city's Housing Affordability Report, Anti-Displacement Plan, Strong Neighborhoods Plan, and Mayor Tom Barrett's 10,000 Homes Initiative have all analyzed housing-related data and made recommendations for increasing the supply of affordable housing in the City. These efforts have been complemented by outside research such as the Analysis of Impediments to Fair Housing, and policy analysis carried out by the Wisconsin Policy Forum and Community Advocates Public Policy Institute. A list of these resources (with hyperlinks) can be found in the Appendix.

In particular the Strong Neighborhoods Plan provides a strong foundation for the affordable housing programs listed below, as it brought together various city departments and community stakeholders to develop and implement strategies to address the impact of foreclosures in Milwaukee neighborhoods. Another important connection is the City of Milwaukee's Comprehensive Plan, which consists of a Citywide Policy Plan and Area Plans. This plan guides all local land use decisions, and as area plans are updated, they provide a community-based framework for investment, a guide for public and private decision-making and coordinating initiatives for many different groups.

The city also has strategic partnerships with MKE United and Take Root Milwaukee, both of which are focused on homeownership and housing market conditions in the City. For example, MKE United's Housing Committee helped establish the Anti-Displacement Fund and is looking at appraisal practices in the City. Take Root Milwaukee came out of the foreclosure crisis in 2010 and is an established network of 50+ groups in this sector, who are focused on strengthening the homebuyer pipeline and the racial disparity gap in Milwaukee's homeownership rate. The intersection of housing and health has brought new partners (and resources) in the form of health care systems and institutions. Also, the Wisconsin Housing and Economic Development Authority (WHEDA) has launched the WHEDA Lab, a new division dedicated to accelerating innovation and developing creative methods to direct resources to underserved markets.

Lastly, one of the driving market conditions in the City of Milwaukee is that median household income in the City has fallen over the last two decades. In real dollars, Milwaukee households earn \$6,000/year less than they did in 2000, and the economic impacts of COVID-19 on low-income residents in particular cannot be overstated. Reducing the racial disparities in terms of median household income, housing cost burden, and homeownership rates are a major focus for much of the housing work currently underway in the City.

The following table describes the different affordable housing activity types supported by HUD and other sources, with a short description of market characteristics that influence their implementation.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant-Based Rental Assistance (TBRA)	A decrease in owner occupied households has increased pressure in the rental housing market, along with a potential increase in rental rates. Both household and per capita incomes in the City are significantly lower than surrounding communities, impacting affordability. The shortage of affordable units is more significant for low-income households.
	A combination of high-market rents and lagging Fair Market Rents will limit the ability of Housing Choice Voucher holders and holders of other forms of TBRA such as Shelter Plus Care to successfully obtain rental housing.
	There is a lack of property owners willing to participate in the Housing Choice Voucher Program. For renters with disabilities, finding safe, affordable housing with accommodations is a challenge (see NA-45 for additional detail).
	The loss of jobs and income as a result of the COVID-19 pandemic has increased housing insecurity for many renters, and demand for temporary rent assistance to prevent eviction or relocate to a more affordable unit is very high.
New Unit Production (Owner-Occupied and Rental Housing)	There is a need for affordable new housing construction particularly on vacant lots in the City's most distressed areas. More neighborhoods and housing service providers are interested in innovative approaches such as smaller units, energy-efficient design features, varied styles, and cooperative forms of ownership.
	When new units are added, considerations around accessibility should be a priority, given the need for housing that accommodates people with disabilities and other special needs.
	Increasing permanent supportive housing and affordable units through rapid re-Housing will help ease pressure on the emergency shelter system and prevent housing instability.
	Homeownership programs that focus on reducing racial disparities and address housing cost burden are of significant interest. The average assessed value of an owner-occupied unit in the City is fairly affordable, with average monthly mortgage payments being less than rental rates for similar-sized units. Low interest rates but tight inventory makes for a very competitive home-buying market even with the current economic recession as a result of COVID-19.
Rehabilitation & Lead-based Hazards Mitigation	Milwaukee's older housing stock (particularly in the central city) means there is a great need for coordinated rehabilitation of owner-occupied and renter-occupied housing units in the CDBG target areas. Resources are limited, and there is a shortage of contractors to meet the need. There is opportunity with energy efficiency programs, which can bring much needed

	improvement to older units.
	There continues to be increased demand for home repair resources and programs such as the Neighborhood Improvement Program (NIP), NIDC Targeted Investment Neighborhoods (TINs), and Neighborhood Improvement Districts (NIDs).
Acquisition & Preservation	While median sales prices continue to recover (although this is not even across the City), sales volume lags despite historically low-interest rates. The average assessed value of an owner-occupied unit in the City is fairly affordable, with average monthly mortgage payments being less than rental rates for similar-sized units. Inventory continues to remain tight. Lending restrictions as a result of the Great Recession are still an issue, and contribute to the slow recovery of owner-occupancy related acquisition activity.
	On the other hand, the strong rental housing market is making the conversion of subsidized rental housing to market-rate housing an attractive opportunity for the owners of such properties. Properties with expiring use restrictions are now more at risk of being lost to the affordable housing stock, making preservation more of a priority.
	The loss of jobs and income as a result of the COVID-19 pandemic has increased housing insecurity for many households, jeopardizing their ability to maintain affordable housing (both renters and owners). Property tax foreclosure is still an issue for the City. There are new efforts to mitigate the impact of eviction.
	With the investment of the HOP Streetcar, there is significant interest in, and activity related to transit-oriented development. With a vision to connect the downtown system to surrounding neighborhoods, home values are increasing in such a way that that threatens displacement of existing residents, resulting in the Anti-Displacement Plan and corresponding fund for eligible homeowners.
Regional Housing Efforts	In Fall 2020 the City, along with seven other jurisdictions in southeast Wisconsin, completed a "Regional Analysis of Impediment to Fair Housing" which identified 15 impediments to fair housing in the region that are a result of systemic inequities. This coincides with new interest in areas outside of Milwaukee in the development of affordable or "workforce" housing. Additionally, the program Opportunity MKE recently launched, which is a regional approach to affordable housing and helps families move to low-poverty, high-opportunity neighborhoods and communities.

Table 54 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Ye	ear 1	Expected	Narrative
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of Con Plan \$	Description
CDGB	public federal	Community Development activities	15,000,000	50,000		15,050,000		
HOME	public federal	Community Development eligible housing activities	4,800,000	300,000		5,100,000		
ESG	public federal	Community Development- Housing & services for homeless persons	1,300,000			1,300,000		
HOPWA	public federal	Community Development- housing & services for persons with HIV/Aids	800,000			800,000		

Table 55 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG - The City meets the HUD requirement by requiring funded agencies provide documentation of eligible sources of matching funds.

HOME – The City of Milwaukee for many years has received a HUD waiver. However, when required to match the HOME funds, the City will utilize City-owned appraised land/real property, foregone taxes, fees, charges, Housing Trust Fund, City bond financing, and other eligible affordable housing projects.

ESG – The City meets the HUD requirement by requiring that funded agencies provide documentation of eligible sources of matching funds.

HOPWA – The City meets the HUD requirement by requiring that funded agencies provide documentation of eligible sources of matching funds.

Other Sources

There are a number of city programs that support goals and strategies in the Consolidated Plan that are funded with other sources not related to CDBG. For example housing initiatives such as the Compliance Loan program, TID Home Improvement Loans, STRONG Homes Loan program, Strong Neighborhoods Homebuyer Assistance and Rental Rehabilitation programs, Tenant Transition to Ownership program, and TIF for Affordable Housing Development are all funded largely through local sources.

Sources related to energy-efficiency, weatherization and environmental sustainability are also leveraged in this work. For example, the City's Property Assessed Clean Energy (PACE) financing program, managed by the ECO department, has financed \$14.3m of energy efficiency projects and has emerged as an important source of gap financing for developers who seek to adaptively reuse old properties.

The city also works with the private sector and philanthropy to invest in and address community needs and support the goals and strategies in the Consolidated Plan. For example, the City is an active member of the Community Development Alliance, a group of funders focused on housing and community development activities in Milwaukee. Other groups include the Milwaukee Area Workforce Funding Alliance and the "MkE Responds Fund" which is a collaborative effort among Milwaukee's community foundations and funders to support response efforts to COVID-19 related impacts.

Lastly, the as the COVID-19 pandemic continues to have rippling and longer term effects in the City's public health situation and local economy, the availability and use of federal funds through economic relief packages such as the CARES Act, has provided critically important resources for the City to support long-term recovery.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Milwaukee may choose to utilize City-owned foreclosed/tax deed properties and/or vacant lots to address the housing and community development needs as identified in the Consolidated Plan.

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.

The City of Milwaukee views the implementation of housing and community development strategies from both a system and neighborhood level. With two contiguous Neighborhood Revitalization Strategy Areas (NRSAs), the City has clearly defined neighborhood target areas that allow it to involve stakeholders in activities that address community needs via neighborhood-based strategies in the Consolidated Plan.

NRSA is a formal designation from HUD concerning a distressed area of a community that allows more effective targeting of community development resources and is described in detail in SP-10 (Geographic Priorities). This allows the City of Milwaukee an opportunity to formally recognize a distressed community area as the target for a coordinated effort to leverage funding and partnerships that spur reinvestment into local human and economic capital. For example, the Community Development Alliance, a group of funders in Milwaukee, recently decided to focus their efforts on housing issues.

The long-term goal of a NRSA is greater self-sufficiency for all of a neighborhood's residents. The city will continue to use NRSAs as a tool for community reinvestment, provided that the documentation is provided that demonstrates the community's distress, the activities are economically feasible, and a comprehensive approach is utilized to encourage citizen participation.

In addition to the NRSA structure, there are several other components of the institutional system that will be utilized to carry out the activities that benefit residents of these areas, of which the City and CDGA play a significant role.

Structure 1: Activities funded by and under the control of the Community Development Grants Administration

Many funded activities are under the direct control and funded by the Community Development Grants Administration. As was stated previously, these activities are primarily funded by Community Development Block Grant, HOME, Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Solutions Grant (ESG) funds. Funded activities will be implemented by the responsible organization and monitored by the CDGA.

Structure 2: Activities carried out by City Departments using a variety of funding sources

There are activities identified that require the collaboration of city departments for successful implementation. There are a variety of funding sources depending on these kinds of projects, and coordination of these activities must be responsive to those sources and occurs between the City departments involved in the project.

Structure 3: Activities carried out by City Departments in cooperation with non-City organizations

Some activities require a city Department to collaborate with a non-city organization for planning and implementation. This structure requires prudent and deliberate efforts at coordination of activities. This structure also requires open and on-going communication among the organizations involved in the specific

collaboration. In structuring a collaborative effort, the City's needs, resources, and goals must be carefully integrated with the requirements, resources, and objectives of the other partners in the project. This can be complex (as these efforts usually have multiple funding sources), but the City of Milwaukee will continue to pursue these relationships to link resources and meet the goals of providing decent housing, establishing suitable living environments, and expanding economic opportunities.

Structure 4: Activities carried out by Non-City Organizations

The majority of social service, public service, income transfer, transportation, and health services delivered in the City of Milwaukee are administered by non-city organizations. These vital services are an essential part of a comprehensive community development effort. There is no formal institutional structure to coordinate these disparate services with those delivered by city departments.

The organizations that carry out these services must do so to satisfy their funding source. At times, some funding source requirements do not necessarily complement the City's policies (or may even contradict) the goals and objectives of city-supported activities. The city makes every effort to be involved with non-city organizations, including nonprofit agencies and for-profit businesses. Still, the City cannot force changes in these services, nor can it create an institutional structure to do so. That being said, these efforts are best done through a collaborative approach, and the City will continue to work with other organizations and community partners to communicate the goals and policies of the City.

Obstacles to Addressing the Need

There are numerous obstacles to the coordination of public and private resources. Most local public organizations are dependent on federal funds and are controlled by competing federal regulations. Each funding source has specific goals and objectives. When these different criteria are implemented at the local level, the result is often a fragmented and internally contradictory service delivery system.

This makes it difficult to attract private participation in such a system because the private sector sees its fragmentation and complexity, and questions the system's ability to produce measurable results. Despite the obstacle, Milwaukee has many important public/private initiatives committed to addressing community needs that are focused on the CDBG target area. They are coordinated individually by their sponsoring organization and through an informal city-wide network of organizations, foundations, non-profits, educational institutions, businesses, and governments.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Milwaukee, Wisconsin	City Government – Mayor's Office, Common Council Various City Departments: Administration, CDGA, City Development, Public Works, Redevelopment Authority, Neighborhood Services, Health, Library, Fire Dept., Milwaukee Police Dept,. Comptroller's Office	Housing; Economic Development, Code Enforcement, Planning & Administration, Public facilities, Environmental Planning & Sustainability, Clearance & Demolition, Brownfields, Lead Abatement, Land Management, Spot Acquisition, Public Services	Jurisdiction
Housing Authority-City of Milwaukee	Public Housing Authority(PHA)	Public Housing, homeownership, rental, planning	Jurisdiction
Nonprofit Housing Providers	Community Housing Development Organization (CHDO)	Housing Providers	Jurisdiction
Nonprofit Youth Services Providers	Subrecipient	Public Services-Youth	Jurisdiction
Nonprofit Job Training & Placement Agencies	Subrecipient	Public Services-Employment Services	Jurisdiction
Nonprofit Housing Providers	Subrecipient	Housing Provider	Jurisdiction
Nonprofit Homeless Service providers	Subrecipient	Housing & Services for Homeless	Jurisdiction
Nonprofit Business Assistance providers	Subrecipient	Special Economic Development	Jurisdiction
Nonprofit NSP/Community Organizing Agencies	Subrecipient	Public Services-Neighborhood Planning; Community Improvement Initiatives; Crime Prevention	Jurisdiction
Nonprofit Agencies & District Attorney's Office	Subrecipient & State of District Attorneys	Public Services-Community Prosecution Unit	Jurisdiction
Nonprofit HOPWA Providers	Subrecipient	Housing Opportunities for Persons with AIDS	Jurisdiction & 4 – County Milwaukee Metro Area

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Nonprofit Housing Providers	Subrecipient	Public Services-Homebuyer Counseling/Homeownership Education	Jurisdiction
Nonprofit Fair Housing Providers	Subrecipient; Nonprofit organization	Fair Housing Enforcement/Public Education	Jurisdiction
City of Milwaukee & Milwaukee County	City of Milwaukee & Milwaukee County Continuum of Care (CoC)	With technical support provided by CDGA, the CoC continues to implement its 10-Year Plan to End Homelessness, monitor project performance, rank projects for funding purposes, coordinate funding applications, support Coordinated Entry, and initiatives to prevent/reduce homelessness.	City of Milwaukee & Milwaukee County
Milwaukee Continuum of Care Providers	Nonprofit and Government Service Providers	With financial support provided by CoC, ESG, CDBG, and other funding: provide prevention, coordinated entry, emergency shelter, rapid re-housing, transitional housing, safe haven, permanent supportive housing services to homeless individuals and families.	City of Milwaukee & Milwaukee County
Partnering Institutions	Nonprofit and Government Service Providers	Provide education (Milwaukee Public Schools), employment and training (Employ Milwaukee), foster care discharge (Bureau of Milwaukee Child Welfare), hospital discharge (hospital systems), mental health care discharge (Milwaukee County Behavioral Health Division, private hospitals), and justice (Milwaukee Co. House of Corrections and State of WI Dept. of Corrections).	City of Milwaukee & Milwaukee County
Private Sector	Housing Development Organizations Table 56 - Institution	Provide investment and technical expertise in partnership with CoC entities to increase Permanent Supportive Housing Inventory.	City of Milwaukee & Milwaukee County

Table 56 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

For many years Milwaukee's efforts to address housing, community and economic development needs have been fragmented, not always coordinated, and lacked a strategic focus. However, starting with the Great Recession and resulting foreclosure crisis a number of events and initiatives have began to bridge these gaps:

- Mayor Tom Barrett's Milwaukee Foreclosure Partnership Initiative (MFPI) in 2008 generated a series of
 collaborative strategies and programs, many of which are still operational today and actively
 responding to the impact of the COVID-19 public health pandemic. These include streamlined
 processes within city government (Neighborhood Services, City Development, Public Works,
 Milwaukee Police Department); Take Root Milwaukee (a community-based homeownership program);
 Strong Neighborhoods, and Mediate Milwaukee (foreclosure and tenant-landlord mediation).
- Philanthropic investments in neighborhood target areas such as the Greater Milwaukee Foundation's
 Healthy Neighborhoods Initiative, Northwestern Mutual Foundation's Building Neighborhood Capacity
 Program (BNCP), and Zilber Neighborhood Initiative have resulted in significant capacity building
 among nonprofit organizations, as well as partnerships with the City.
- The publication of Matthew Desmond's book "Evicted" in 2016, brought national attention to the issue of eviction in Milwaukee. In 2018, the Advancing a Healthier Wisconsin Endowment at the Medical College of Wisconsin funded a project through the City of Milwaukee and CommonBond Communities, which brought together a diverse set of stakeholders from the public, nonprofit, and private sectors to form the Eviction Prevention Task Force. The task force worked with the Wisconsin Policy Forum, resulting in recommendations now in implementation such as the Rental Housing Resource Center and expansion of legal and mediation services.
- In 2019 the United Way of Greater Milwaukee and Waukesha County announced their Safe & Stable Homes: Ending Family Homelessness campaign, which will invest \$55 million dollars over five years on strategies to end family homelessness by 2025. This has entailed significant collaboration among philanthropy, the CoC, CDGA, nonprofit service providers, other institutions and the private sector.
- The intersection of housing and health has brought new partners (and resources) in the form of health care systems and institutions. Milwaukee County's most recent Community Health Needs Assessment resulted in the launch of Milwaukee Health Compass, a data tool that tracks public health and other outcomes related to the social determinants of health. Health care institutions and Community Development Financial Institutions (CDFIs) are looking at making new investments in housing.
- In recent years, the City's Housing Affordability Report, Anti-Displacement Plan, Strong Neighborhoods Plan, 2020-2024 Consolidated Plan, and Mayor Tom Barrett's 10,000 Homes Initiative have all analyzed housing, economic and neighborhood based data. These efforts have been complemented by outside research such as the Analysis of Impediments to Fair Housing, and policy analysis carried out by Community Advocates Public Policy Institute and the Wisconsin Policy Forum.

- 2020 has brought not only a public health pandemic, but also significant attention to racial justice issues and efforts to address the impacts of persistent racial and economic segregation in Milwaukee. In late 2020 the City of Milwaukee established an Office of Equity and Inclusion, which will be housed in the same department as CDGA. Long-term racial inequality led both Milwaukee County and the City of Milwaukee to declare racism as a public health crisis, acknowledging that local government has a significant role to play in engaging all residents in racial justice work. Reducing the racial disparities in terms of median household income, housing cost burden, and homeownership rates are a major focus for much of the community development work currently underway in the City.
- The physical, economic, and social impacts of COVID-19 on low-income residents in particular cannot be overstated. This has created the conditions for significant, collaborative action across sectors. A wide range of city departments are now actively working with the Milwaukee Health Department in response to the pandemic. The MKE Civic Response Team, a philanthropic coalition formed immediately in the aftermath of public health restrictions and shutdowns, is working to coordinate the community response to COVID-19. They are working closely with the City of Milwaukee and a diverse array of community-based stakeholders in the following areas: 1) Early Childhood Education; 2) Economic Recovery; 3) Food Security; 4) K-12 Education; 5) Mental Health; 6) Physical Health; and 7) Shelter/Housing.

The above efforts demonstrate that there is now a comprehensive understanding of Milwaukee's key housing and economic development challenges among a diverse group of stakeholders and across systems. There is a significant amount of collaborative work underway to establish a framework to increase the availability of safe, affordable housing in the City of Milwaukee.

However, a key challenge is the difficulty in working across and with other systems. For example, the homeless services system tends to operate as an insular system. This often means it tries to solve problems in which it has no expertise, such as employment and mental health, instead of engaging major institutions, other systems (i.e. workforce, health care), neighborhood organizations, and the community to take responsibility for appropriate portions of the problem.

The other gap/challenge that impacts the institutional delivery structure is that affordable housing is truly a regional issue, but until very recently, the City has not worked much with other jurisdictions to address impediments to fair and affordable housing. With the recent completion of the "Analysis of Impediments to Fair Housing" there is opportunity to work with jurisdictions in southeast Wisconsin on addressing policies that result in housing discrimination or diminished opportunity.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
	Homelessness Prevent	ion Services	
Counseling/Advocacy	✓	√	✓
Legal Assistance	✓		
Mortgage Assistance	✓		
Rental Assistance	✓	✓	✓
Utility Assistance	✓		

Street Outreach Services					
Law Enforcement	✓	✓			
Mobile Clinics		√			
Other Street Outreach	✓	✓	✓		
Services					

Supportive Services					
Alcohol & Drug Abuse	✓	✓	✓		
Child Care	✓				
Education	✓	✓			
Employment and Employment	✓	✓			
Training					
Healthcare	✓	✓			
HIV/AIDS	✓		✓		
Life Skills	✓	✓			
Mental Health Counseling	✓	✓	✓		
Transportation	✓	✓	✓		

Other					
Other: Mainstream Benefit	✓	✓	✓		
Enrollment Assistance					

Table 57 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

A large number of service providers in Milwaukee's homeless services system approach the work with a "Housing First" philosophy, focusing on housing stability first and then bringing in supportive services along with it. The standard components of the homeless services system are working adequately; however, high return rates to homelessness (shelter) indicate that permanent housing placement is not sustainable over the long term for many of the system's clients without supportive services.

The primary service delivery mechanism within the homeless services system and temporary/permanent housing is case management. It is central to the ability of homeless clients to identify their needs and access the services and benefits that will address those needs. Along with Housing First, case management is a structure that helps address the multitude of issues often faced by those experiencing chronic homelessness.

Case management alone, however, is not sufficient to address some of the serious, systemic needs presented by homeless clients. Case managers must be able to access the resources of mainstream institutions such as the workforce development system or the behavioral health system or develop strategies to provide similar services in-house. These other, institutional systems can often be difficult to interact with for service providers.

Another component to the Housing First model includes the Resident Advisory Council, which provides the opportunity for them to offer recommendations and help improve the quality of their lives. The council meets regularly and is composed of both Housing First residents and staff.

MA-30 (Homeless Facilities and Services) contains a detailed description of specific areas of mainstream services that are both critical, but difficult to deliver effectively such as mental health, employment and income supports, and housing placement.

In summary, the key elements of the current service delivery system for homeless persons include:

- Significant variations in the level and intensity of case management among programs;
- Partnerships developed at the individual agency level rather than the system level, e.g., one shelter in collaboration with one employment services provider rather than the homeless services system in partnership with the workforce development system;
- Services developed in-house to compensate for lack of access to institutional services; and
- Limited communication and collaborative case planning for clients who have been involved with multiple providers and have experienced a high rate of return.

Strengths in the current system include:

- The use of Coordinated Entry to prioritize individuals and families in greatest need into shelter.
- The continued gradual shift of resources and investment towards prevention or early intervention programs, and rapid re-housing to reduce reliance on emergency shelter.
- Increased capacity to implement the Housing First model, which focuses on getting a person/family stably housed, then access to guided supportive services.
- Sustained collaboration among CoC service providers as they address different areas of need such as serving populations with emerging risk for homelessness, eviction prevention, etc.
- Increased capacity to build new permanent supportive housing, including units for specific groups such as veterans, youth aging out of foster care, victims of trafficking or exploitation, etc.

Gaps in the current system include:

- Stronger connections at a service provider level to mainstream service systems, particularly health care, mental health, and employment services.
- Better integration with institutions such as physical and mental health care providers, correctional institutions/jails, community-based transitional housing facilities, etc. for connection to both emergency and permanent housing.

- Resources to assist families with mental health needs (and may require care for children); and other program barriers such as participation in a specific recovery plan.
- Traditional employment services are difficult for those experiencing homelessness to access; some homeless service providers have been able to form individual partnerships with specific workforce providers.
- Resources to support additional Housing Navigators to expand homelessness prevention and rapid re-housing program access, including "transitional" case management services to ensure clients remain stably housed past six months.
- Supportive services and/or case management for participants in public housing programs.
- A lack of protective payee services that also provide case management assistance. For example, people receiving SSI/SSDI are more successful in remaining securely housed when working with a payee case manager.
- Disconnection between the broader group of veterans-serving organizations and the homeless services system (mainly as they do not seek or receive HUD-based support).

Overwhelmingly, agencies are finding that specialized case management within the CoC is necessary to make gaining income a success. There are currently no dedicated dollars to this within the CoC, and a recent estimate by providers noted that a steady stream of \$200,000-300,000 for specialized case management would support higher success rates in exiting from emergency shelter into housing, retaining permanent housing, and avoiding future episodes of homelessness.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Much like the supportive service needs of persons experiencing homelessness described above, access to services such as employment and job training, legal services, healthy food, mental and physical health care in particular would benefit the special needs populations identified in NA-45 (Non-Homeless Special Needs Assessment).

Those groups include: Individuals Living with HIV/AIDS, Seniors/Elderly, People with Disabilities, Veterans, Formerly Incarcerated, and Immigrants/Refugees.

Strengths in the current system include:

- A network of established service providers that work specifically with these special needs populations and have a strong understanding of their needs, as described in MA-35 (Special Needs Facilities and Services).
- Most larger-scale affordable housing development in recent years have focused on providing safe, stable housing for Seniors, People with Disabilities, and Veterans, helping to fill an important gap.
- An awareness of, and emerging efforts, to form collaborative services with institutions to meet the
 needs of groups like the Formerly Incarcerated, Veterans, and Immigrants/Refugees. Each of these is a
 part of another system (i.e. criminal justice, VA) that does not always connect well with housing service
 providers.

 There are collaborative efforts and/or lead organizations for each of these groups (i.e. Disability Rights Wisconsin, Milwaukee County Department on Aging, Vivent Health, Center for Veterans Issues, Milwaukee Reentry Council, International Institute of Wisconsin, etc.) that can provide important connection points for housing and service providers.

Opportunities for the current system include:

- Stronger connections at a service provider level to mainstream service systems, particularly health care, behavioral and mental health services, veterans affairs, and workforce development programs.
- Better integration with CoC and other housing providers to more strongly connect safe and stable
 housing opportunities with supportive services. For example, housing for formerly incarcerated
 individuals is difficult to find but there are supportive services available; for individuals living with
 HIV/AIDS there are no designated permanent supportive housing units as part of the Housing
 Opportunities for Persons with AIDS (HOPWA) program, which means supportive services can be
 disconnected from housing assistance.
- Supportive services and/or case management for participants in public housing programs (particularly seniors and people with disabilities).
- Services (health care and otherwise) for senior clients that are experiencing dementia or early Alzheimer's.
- Improved connection between the broader group of veterans-serving organizations and the homeless services system (mainly as they do not seek or receive HUD-based support).
- Improved data organization, filtration, review, and application. There is a wealth of data collected by the CoC and other homeless service providers in the Homeless Management Information System (HMIS). The opportunity is to better utilize that data across the system.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

In order to reduce homelessness and meet the needs of special needs populations, housing and service providers must work across systems and engage those resources to address gaps, particularly in accessing employment and income supports, and behavioral health services. Other strategies to overcome gaps include:

- 1. Further support of Coordinated Entry practices that strengthen the implementation of Housing First.
- 2. Improved collaboration with the workforce development system to increase access to employment and training resources for persons experiencing homelessness, or those with special needs (i.e. people with disabilities, veterans, formerly incarcerated, immigrants/refugees).
- 3. Support for the implementation of additional workforce pilot programs that entail formal, specialized partnerships between homeless service providers and workforce/training providers to assist clients with accessing employment.
- 4. Improved collaboration with the behavioral health system to increase capacity within homeless service agencies to address the mental health needs of clients and to enhance a higher-level level of support and treatment resources.

- 5. Development of a sustainable mechanism for collaborative case planning and service delivery that respects the rights of clients while improving communication to achieve better outcomes.
- 6. Continuing to increase the capaCity of permanent supportive housing for special populations.
- 7. Implementation of a formal structure (technology/database, staff support) to engage private property owners and smaller-scale landlords to increase access to safe, stable rental housing.
- 8. Continuing the investment of resources in homelessness prevention and rapid re-housing to reduce reliance on emergency shelter.
- 9. Active engagement by CoC members in the newly established Rental Housing Resource Center, which was formed as response to evictions and has strong connections to homelessness prevention strategies.
- 10. Strategic use of HMIS data to identify, establish and regularly review system-wide outcome targets that inform service delivery and long-range plans to reduce homelessness.
- 11. Support for the development of a tool to estimate future homelessness, currently in implementation by the CoC, using technical resources available through HUD, CoC members, and other city departments. It will help provide the Milwaukee CoC with a way to monitor a handful of data sets for potential entries into the homeless system, and then activate support in other institutions and/or systems with prevention strategies.

Lastly, homeless service providers in Milwaukee's CoC have been quite innovative in responding to the impacts of COVID-19. Limitations on shelter capacity, more street homelessness, and shifts in how services are delivered have been challenging but have also led to new approaches and partnerships to provide safe shelter and connect people to housing navigation and supportive services. What has been learned will be used to inform strategies in the Consolidated Plan as a way to address these gaps.

SP-45 Goals Summary - 91.215(a)(4)

Goals Summary Information

The following goals are related to specific funding sources, but these are only part of larger city efforts. They will be finalized as part of the City's annual action planning process, public comment and entry into HUD's Integrated Disbursement and Information System (IDIS).

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Fundin g	Goal Outcome Indicator	FY 2020- 2024 Bench marks proposed
Affordable Housing: Owner- occupied & Rental Rehab & New Construction; (includes CHDO & CHDO Operating Funds)	1/1/20	12/31/24	Housing	Jurisdiction	Affordable owner- occupied & rental housing	CDBG & HOME funds	# of affordable homeowner & rental units complete & sold or occupied by eligible persons	535
Housing- Neighborhood Improvement Program (NIP)	1/1/20	12/31/24	Housing	Jurisdiction	Affordable owner- occupied housing	CDBG & HOME funds	# of affordable homeowner units complete	350
Tenant-Based Rental Assistance	1/1/20	12/31/24	Housing	Jurisdiction	Affordable owner- occupied Housing	CDBG & HOME funds	# of units occupied by eligible persons	500
Housing Accessibility/ Modifications	1/1/20	12/31/24	Housing	Jurisdiction	Affordable owner- occupied & rental housing	CDBG funds	# of units constructed/reh abbed & occupied by eligible persons	125
Lead-Based Paint Prevention & Abatement	1/1/20	12/31/24	Housing	Jurisdiction	Decent, safe, quality owner- occupied & rental housing	CDBG funds	# of units abated & households provided with a safe living environment	450

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Fundin g	Goal Outcome Indicator	FY 2020- 2024 Bench marks proposed
Code Enforcement	1/1/20	12/31/24	Housing Code Enforcement	Jurisdiction	Decent, safe, quality owner- occupied & rental housing	CDBG funds	# of residential structures brought into code compliance	12,500
Demolition, Clearance & Remediation	1/1/20	12/31/24	Housing	Jurisdiction	Decent, safe, quality owner- occupied & rental housing	CDBG & HOME funds	# of parcels remediated for future development	0
Special Economic Development/ Business Assistance/Job Creation	1/1/20	12/31/24	Special Economic Development	Jurisdiction	Expand economic opportunities increase access to services; and a suitable living environment; sustainability	CDBG funds	# with increased access to economic opportunities & services; a suitable living environment; sustainability	275
Employment Services	1/1/20	12/31/24	Public Services	Jurisdiction	Expand economic opportunities increase access to services & a suitable living environment	CDBG funds	# with access to economic opportunity & a suitable living environment	400
Fire Prevention/ Education	1/1/20	12/31/24	Housing	Jurisdiction	Decent, safe, quality owner- occupied & rental housing	CDBG funds	Increase access to affordable, quality housing & a suitable living environment	0
Homebuyer Counseling Education	1/1/20	12/31/24	Public Services	Jurisdiction	Increase access to affordable, quality housing and a suitable living environment	CDBG funds	# with access to affordable, quality housing and a suitable living environment	1,000

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Fundin g	Goal Outcome Indicator	FY 2020- 2024 Bench marks proposed
Youth Services	1/1/20	12/31/24	Public Services	Jurisdiction	Suitable living environment; increase access to services	CDBG funds	# with access to services & a suitable living environment	60,000
Neighborhood Strategic Planning/ Community Organizing/ Crime Prevention	1/1/20	12/31/24	Public Services	Jurisdiction	Suitable living environment	CDBG funds	Suitable living environment; number of stakeholders benefiting from community improvement efforts	1,284,090
Driver's License Recovery & Employability Program	1/1/20	12/31/24	Public Services	Jurisdiction	Suitable living environment	CDBG funds	# persons obtaining a valid driver's license	550
Community Prosecution Program	1/1/20	12/31/24	Public Services	Jurisdiction	Suitable living environment	CDBG funds	# properties & nuisances abated/ resolved	500
Homeless Services	1/1/20	12/31/24	Public Services	Jurisdiction	Availability/ Accessibility; suitable living environment; housing stability	CDBG funds	# with increased access to permanent housing & supportive services	20,000
Planning – Technical Assistance & Capacity Building for Nonprofits	1/1/20	12/31/24	Technical Assistance	Jurisdiction	Suitable living environment; increase access to services	CDBG funds	# agencies receiving technical assistance & improved organizational strength & capacity	150

Table 58 – Goals Summary

Goal Descriptions

Goal Name	Goal Descriptions
Affordable Housing: Owner-occupied & Rental Rehab; New Construction; (includes CHDO & CHDO	- Rehabilitate distressed properties in the Target Area with a focus on deteriorated, boarded and vacant properties with an emphasis on foreclosures. At completion, the properties are code compliant and energy efficient and are marketed to income eligible residents.
Operating Funds)	- Construct new homes on vacant city lots (infill) for sale to low/moderate income owner-occupants; and construction of new affordable rental units.
	- Provide loans and technical assistance to owner-occupants of one to four unit residential properties in need of repair and at very low interest. Code violations and energy conservation items are the top priorities of the program.
	- Tenant-Based Rental Assistance program is a rental program designed to assist households with their housing expenses, while they focus on becoming self-sufficient. The program is able to assist families by providing assistance with security deposits and rental subsidies for up to 24 months.
Housing-Neighborhood Improvement Program (NIP)	Neighborhood Improvement Program (NIP) - Administered by several community-based housing organizations. Forgivable housing rehabilitation loans for repairs based on interior and/or exterior municipal code violations. NIP clients must be owner-occupants of the property for a specified number of years before applying for assistance; agree to remain an owner occupant for a specified number of years following the completion of the housing rehabilitation work and the household must be income eligible.
Down Payment & Closing Cost Assistance	Provide down payment & closing costs assistance to prospective first-time homebuyers.
Milwaukee Builds/Youth Build Program	This program provides on-site housing construction and rehabilitation training and work experience, off-site academic classes and supportive services for at-risk young people. The program provides young people with education, employment skills and career direction leading to economic self-sufficiency. Youth Build also creates affordable housing opportunities in the community. Nonprofit community-based agencies are funded to undertake this program.
Housing Accessibility / Modifications	Housing accessibility improvements for income eligible persons with physical, visual and hearing disabilities. Improvements can include handicap accessible ramps, bathroom, kitchen, bedroom and living room modifications, safety enhancements and assistive devices.
Lead-Based Paint Prevention & Abatement	Inspection, testing and abatement procedures for housing rehabilitation programs.

Tenant Assistance/Rent Abatement/Rent Withholding Program Landlord/Tenant Programs	Ensures that identified code violations on rental properties are addressed by allowing renters living in units with expired code repair orders to pay rent into a city-held account until repairs are made. Program provides renters with emergency relocation from condemned properties and emergency shelter when necessary. Rental proceeds may be used for repairs related to health, safety and welfare of tenants. (Administered by community-based organizations, in collaboration with the City).
Graffiti Abatement Program Code Enforcement	Remove graffiti from residential structures; public education.
Code Enforcement	Efforts undertaken in a deteriorated area being renewed to address and arrest the decline in a designated blighted area.
Demolition, Clearance & Remediation	Demolition of city owned, tax foreclosed and other foreclose and blighted properties for future redevelopment. <u>Brownfields Redevelopment</u> - Program is geared toward revitalizing properties that are vacant or underutilized and are often suspected to be environmentally contaminated. The program aims to turn blighted sites into economically productive properties and relieve the significant psychological barriers that can inhibit the quality of life within a commercial or residential neighborhood. <u>Spot Acquisition</u> - Acquisition of blighted properties and lots for eventual housing and commercial redevelopment.
Fire Prevention/ Education	Install free smoke detectors for low income households. Provide additional services such as: fire inspections, blood pressure tests, stroke screenings and referrals for additional social services.
Community Prosecution Program	Collaborate with the Milwaukee Police Department and the District Attorney's office to abate criminal activity and nuisance properties and nuisance behavior in neighborhoods.
Youth Services	Social, educational and recreational activities and services for low-moderate income youth; internship/work experience programs; safe havens; school-community initiatives; truancy abatement and teen pregnancy prevention. Provides structured safe haven programs for youth at various locations throughout the City of Milwaukee.
Homebuyer Counseling/ Education	This program provides homebuyer counseling and other homebuyer assistance activities to facilitate mortgage loan closings for first-time low-income homebuyers. Besides pre-purchase counseling and mortgage loan assistance, nonprofit community-based organizations provide budget counseling and assistance with credit repair. Counseling services also include assistance to residents in obtaining home improvement/repair loans, refinancing of existing mortgage loans, post purchase, tax default and mortgage default counseling. In addition, the homebuyer counselors act as a liaison between homebuyers, lenders and real estate professionals.
Employment Services	Job Placement & Job Training & Placement - Includes skilled trades, industry specific job training and placement opportunities boosting employment and living wage jobs for low-moderate income individuals.

Housing Opportunities for Persons with Aids (HOPWA)	Housing & supportive services for persons with HIV/AIDS to facilitate housing stability, independence and improve quality of life. (4-County Metro Milwaukee Area)
Fair Housing	<u>Fair Housing: Public Education</u> - Public education program that includes presentations on fair housing laws, programs for homeowners on discriminatory homeowner's insurance practices, fair housing training seminars, technical assistance on fair housing compliance and housing information referral service to ameliorate racially segregated housing patterns in the metropolitan Milwaukee area.
	<u>Fair Housing Enforcement</u> - Through walk-ins, general referrals from governmental agencies and other advocacy groups, program provides counseling and testing services for persons alleging violations of fair housing in rental, sale, insurance, financing and appraisals to ameliorate racially segregated housing patterns in metropolitan Milwaukee.
	<u>Fair Lending</u> - Advocates for the removal of institutional barriers to private sector investments in Milwaukee neighborhoods. Monitors compliance with lending laws and promotes partnership development activity with financial institutions to reduce the patterns of segregation and to increase minority lending practices in metro Milwaukee.
	<u>Eviction Prevention</u> - Advocate for and support eviction prevention efforts such as the newly formed Rental Housing Resource Center, increased access to mediation services to divert potential eviction filings; increased access to legal services; and an increase in the availability of temporary rent assistance funds
Homeless Services	Housing and services for homeless individuals and families, victims of domestic violence, veterans, and troubled youth, including assistance with rent payment, obtaining appropriate supportive services, permanent housing, transitional housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living.
Driver's License Recovery & Employability Program	Assist low income persons with driver's license recovery, employment & other supportive services.
Neighborhood Strategic Planning/Community Organizing/Crime Prevention	Programs are a coordinated, proactive approach to neighborhood stability combining organizing efforts with public enforcement efforts (DNS, Health, Police and City Attorney) as a tool in dealing with crime, neighborhood clean ups, nuisance properties, block club formation and other neighborhood issues.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the period of the Consolidated Plan (2020-2024), the City proposes to complete the following affordable housing units for income eligible households, as defined in the HOME regulations.

Housing Goals	Proposed Number of Units to be Completed
Rental Housing	610
Homeowner Goals	575
Total Overall Housing Goals	1185

The goals above are related directly to HOME-based investments. However, the City of Milwaukee began tracking city government investments in affordable housing in a more comprehensive way in 2018 when Mayor Tom Barrett announced the "10,000 Homes" initiative. The tracking includes results from twenty city housing programs, and only tracks units that receive city assistance and benefit households with an income of 80% of Area Median Income (AMI). From January 2018 through December 2019, 10,000 Homes reported that 582 new housing units were created, 1,016 housing units had been preserved or improved, and 494 individuals purchased homes with some city support (10,000 Affordable Homes Effort on Track, Jannene, Urban Milwaukee, 2/10/20).

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable - Not under a Section 504 Voluntary Compliance Agreement

Activities to Increase Resident Involvements

The Housing Authority of the City of Milwaukee (HACM) is governed by seven Commissioners, two of whom are public housing residents. It is their responsibility to determine Housing Authority policy and assure agency compliance with all applicable state laws and federal regulations. HACM will continue to support the Resident Advisory Board, (RAB) which is the organization that represents the residents of the entire Housing Authority of the City of Milwaukee, and includes representatives from HACM's housing developments and the Rent Assistance Program. The Housing Authority meets with the Resident Advisory Board (RAB) on a monthly basis. The RAB assists the Housing Authority with the development and implementation of policies and plans, including the Annual Plan.

In addition to the Resident Advisory Board, each of the Housing Authority's developments has a Resident Council that meets on a monthly basis to discuss policies and procedures, programs and activities that affect their housing development. Both the RAB and the Resident Councils also receive a small amount of HUD funding every year to help fund resident participation activities. HACM has also worked to improve resident leadership capacity by providing training and technical assistance to resident leaders.

Is the public housing agency designated as troubled under 24 CFR part 902?

Not applicable - The Housing Authority is not designated as troubled under 24 CFR Part 902.

Plan to remove the 'troubled' designation

Not applicable - The Housing Authority is not designated as troubled under 24 CFR Part 902.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

[The following is excerpted from MA-40 Barriers to Affordable Housing]

One of the most significant barriers to affordable housing in the City of MIlwaukee is that household income has not kept pace with the cost of housing. More people are spending a significant amount of their income on housing costs and generally have difficulty finding safe and decent housing in the private market. This was described in greater detail in the Needs Assessment sections on housing cost burden (NA 15-30).

The median household income in the City is significantly lower than surrounding communities; poverty and unemployment rates are significantly higher than in the metro area, indicating that there is strong demand (and need) for affordable units as the City of Milwaukee is home to a high percentage of the region's low income households. The gap in supply of affordable rental units is greatest for very to extremely low-income.

Additionally, the significant decline in both the number and percentage of households that owned their own homes since the Great Recession, along with an increase in investor-owned properties has created barriers to affordable homeownership in the market. The city's older housing stock presents challenges as the cost of home repair/maintenance can be prohibitive for low- to moderate-income households and/or owners with high monthly housing costs.

Nearly 68% of respondents to the Consolidated Plan community survey stated that housing discrimination was common in Milwaukee County. There is still often community opposition to affordable housing developments both in city neighborhoods, but also in other jurisdictions in the region.

Milwaukee's continued standing as one of the most segregated cities and metro areas in the country is a result of a long history of structural and institutional racism. The legacy of past "redlining" practices continues to manifest in deep racial and economic inequalities in the region, including a persistent and startling racial wealth gap.

In 2019, the City of Milwaukee participated in a collaborative "Regional Analysis of Impediment to Fair Housing" as part of the *Affirmatively Furthering Fair Housing (AFFH)* requirement by HUD. Although HUD effectively suspended implementation of the agency's 2015 AFFH regulation in January 2018, the City and its partners agreed to move forward with the analysis, which was released for public comment in November 2020 and will be submitted with the City's 2020-2024 Consolidated Plan.

The analysis included the counties of MIlwaukee, Jefferson, Ozaukee, Washington, and Waukesha, plus the municipalities of Wauwatosa and West Allis. The resulting analysis was completed in 2020, and took a deeper look at some of the longstanding systemic problems that plague the region. These impediments range from and are not limited to:

- Lack of regional strategy and housing plan
- Lack of regionally dispersed affordable housing
- Restrictive land use regulations and exclusionary zoning ordinances
- Prevalent "NIMBYism" or fear of others in some communities
- Strong jobs-housing-transit mismatch across the region

- Lack of fair housing guidance and enforcement
- Lack of accessible housing for persons with disabilities
- Racial disparities in homeownership
- Overcrowded housing
- Extensive use of evictions

The assessment also found that Milwaukee, being the largest City of the collaborative, has some distinguishing characteristics that deserve special attention (although some were also shared by the older suburban cities in the collaborative). These characteristics include:

- Gentrification in some neighborhoods surrounding the downtown area
- A lack of private investment in specific neighborhoods
- Racial and ethnic disparities in mortgage lending, insurance and appraisal practices
- A lack of awareness of fair housing laws

Lastly, barriers to affordable housing development outside the City continue to prevent affordable housing for families from being developed for the most part anywhere <u>except</u> in the City of Milwaukee. While the region is seeing new affordable housing development announcements in the surrounding communities, the issues described above are still very prevalent in Milwaukee and contribute to our region's extreme racial segregation.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of Milwaukee will continue to support multiple housing and other programs that support the administration and enforcement of federal, state and local fair housing ordinances; affirmatively promote neighborhoods; and help to strengthen neighborhoods and eliminate blight. Broadly, these programs are focused on the following activities:

- Develop, maintain and expand the supply of affordable, safe and decent housing that is accessible to income eligible persons;
- Expand opportunities for low-income citizens to access affordable housing, particularly for large families, people with disabilities, and seniors;
- Increase maintenance and improvement of existing units;
- Assist in preserving existing housing units; and
- Improve the condition of the City's housing stock.

The following strategic goals will be pursued to address barriers to affordable housing in Milwaukee:

A) Increase owner-occupied housing: Support initiatives that increase opportunities for first-time homebuyers and/or reduce racial disparities in homeownership (i.e. downpayment assistance, employer-assisted homeownership, rent-to-own, HACM Section 32); Continue support of housing counseling organizations to prepare homebuyers; Leverage the work of programs such as Strong Neighborhoods and Take Root Milwaukee to broadly promote homeownership resources; Work with other community-based organizations to expand access to financial management and credit-building programs; Produce new units via single-family construction and development in targeted neighborhoods.

- **B)** Rehabilitation of owner-occupied housing: Continue to support city-led programs, community-based grants, and affordable private market products that help homeowners with repairs and code compliance; Support and leverage environmental sustainability resources (weatherization, energy-efficiency, lead abatement, etc.) to improve housing quality; Continue to provide resources to address the impact of foreclosures (both bank-owned and property tax related) on neighborhoods, focusing particularly stabilizing areas of minority concentration.
- **C) Expand rental housing (new production and rehabilitation):** Support projects the increase the number of units for extremely and very-low income residents; Expand the number of affordable units available for large families; Improve existing units by working with neighborhood organizations, landlord compacts, and other community partners to connect them to repair resources; Support efforts to mitigate the impact of evictions (Rental Housing Resource Center, landlord engagement); Work with the Department of City Development on strategies to increase development of affordable, mixed income housing.
- **D)** Increase resource for, and access to, tenant-based rental assistance: Preserve existing rental housing units to maintain affordability; Assist extremely and very-low income residents to address housing cost burdens; Work with Continuum of Care (CoC) providers to stably house people through rapid re-housing and permanent housing programs; Support programs such as Opportunity MKE and landlord engagement to expand the use and acceptance of Housing Choice vouchers.
- **E) Provide oversight and accountability on fair housing issues:** Support the enforcement and education of fair housing ordinances with community partners and the City's Equal Rights Commission. Below is additional information on the City's fair housing ordinance and specific programs to promote fair housing.
- **F)** Leverage multiple housing finance sources to support affordable housing goals: Current resources through the federal and state government (HUD CDBG, CHDO, HOME, SHP; low-income housing tax credits; public housing; housing vouchers); Increase use of and support for sources such as Tax Incremental Financing (TIF); city Housing Trust Fund; philanthropic community, Community Development Financial Institutions (CDFIs), and health care systems; New and emerging efforts to support preservation such as the Anti-Displacement Fund and strategic acquisition fund.
- **G)** Align programs and policy to address affordable housing challenges: Work with other city departments to continue to streamline city housing program administration for efficiency and increased access through larger strategic frameworks such as 10,000 Homes, Strong Neighborhoods, Anti-Displacement, etc.); Leverage the work done with seven other jurisdictions as part of the "2020 Regional Analysis of Impediment to Fair Housing" to improve affordable housing practices across the region.

The city will also work with a diverse group of stakeholders across sectors on the following challenges:

- Expand the opportunity for homeownership to people of color and low- to moderate-income families within and outside of areas of minority concentration.
- Explore emerging initiatives to preserve affordability such as cooperatives, community land trust, intergenerational housing, etc.
- Support efforts to address issues with appraisals and valuations of city real estate.
- Address contractor and labor capacity in the housing development sector.
- Integrate sustainable design guidelines and resources in residential development.

- Support community development partnerships with health care providers to improve both housing and health outcomes for residents.
- Support strategies that increase median household income and opportunities to build wealth.
- Conduct an annual review of Home Mortgage Disclosure Act (HMDA) and Community Reinvestment Act (CRA) information in partnership with Take Root Milwaukee and the Metropolitan Milwaukee Fair Housing Council to assess fair lending practices in the City.

FAIR HOUSING PROGRAMS

City of Milwaukee Fair Housing Ordinance

The city passed its first fair housing ordinance on December 12, 1967. In line with Wisconsin State Statutes enacted in 1965, the ordinance rendered unlawful any type of discrimination in the sale, rental or lease of housing based on race, color, religion, national origin or ancestry. Expressly prohibited were the following forms of discrimination: (1) Refusal to sell, lease, finance or contract to construct housing or to discuss the terms thereof; (2) Refusal to permit inspection or exacting different or more stringent price, terms or conditions related to the sale, lease or rental of housing (3) Refusal to finance or sell an unimproved lot or to construct a home or residence on a lot; or (4) Publishing, circulating, issuing, displaying or advertising the sale, financing, lease or rental of housing which states or indicates any discrimination in connection with housing. The City's original fair housing ordinance was repealed and recreated on October 16, 1990 and again on December 16, 2008. Referred to as Chapter 109, it was subsequently amended to prohibit both housing and employment discrimination. Regarding housing, the law applies to all housing units intended for occupancy by two or more families living independently of each other, eliminates provisions against testing and substantially increases penalties for non-compliance.

NOTE: The "Regional Analysis of Fair Housing Impediments" completed in Fall 2020 also recommended that county-level fair housing ordinances be developed for Waukesha, Jefferson, Ozaukee, and Washington counties to provide guidance for municipalities and other jurisdictions in those counties. As a member of the collaborative and considerable expertise (and strong partnerships), the City of Milwaukee can provide guidance in such an effort.

City of Milwaukee Equal Rights Commission

In 2019 the City and the Equal Rights Commission (ERC) celebrated its 75th anniversary, with a refocused mission of "Promote and protect equality, equity and human rights through education, enforcement and community engagement." The Milwaukee Common Council approved legislation on December 16, 2008 recommending a new ERC model, with commissioners confirmed in January 2009. The draft of the model can be summarized as follows:

The City of Milwaukee ERC was re-established by ordinance with the broad objective of providing oversight and establishing collaborative working relationships with other organizations in Milwaukee, academia and the business community to improve the equal rights climate in the City of Milwaukee. The proposed model will maintain the City's oversight, investigative and enforcement capabilities over discriminatory practices not addressed and protected by federal and state laws. The broad functional responsibilities of the ERC are: 1)

Oversight/Accountability; 2) Community Collaboration and Partnerships Prevention; and 3) Education and Training.

Annual Review of Lending Practices

The Milwaukee Common Council adopted legislation requiring the City Comptroller to prepare an annual report on lending practices by area financial institutions. Besides focusing on residential lending practices, the review also compares lending patterns by race and income and compares the racial loan denial rate for Milwaukee with forty-nine other large metropolitan areas in the country. Recommendations are provided for improving residential lending in those areas of the City where homeownership is lowest and annual reviews of the progress that city departments have made in implementing prior report recommendations.

Additionally, since 2013, local homeownership initiative Take Root Milwaukee and the Metropolitan Milwaukee Fair Housing Council have partnered to produce a similar analysis of Home Mortgage Disclosure Act (HMDA) and other fair lending data, focusing on access to credit for low- to moderate-income and non-white borrowers. This annual analysis is shared with the City, community-based organizations, and other private sector partners and used to identify and promote best practices with financial institutions in terms of reaching underserved communities.

City Subcontracts with Fair Housing Programs

The city works with the following agencies to affirmatively work toward integrated housing patterns and respond to affordable housing issues such as predatory lending, eviction, foreclosure, and related consumer issues.

The **Metropolitan Milwaukee Fair Housing Council (MMFHC)** will affirmatively work toward integrated housing patterns by providing: fair housing/fair lending presentations, research and technical assistance relative to fair housing/fair lending issues, information relative to buying, renting and selling homes, counseling and investigation services to receive and resolve fair housing/fair lending complaints, distribution of a fair housing newsletter on a quarterly basis and a coordinated community-wide response to the problem of predatory lending. This will be accomplished through the following:

- The Enforcement Program: Intake of fair housing complaints and counseling on options for administrative or judicial remedy; Investigative services for persons who allege housing discrimination; Referrals to attorneys and government agencies; and Systemic investigations of institutional discrimination.
- Outreach & Education Program: Presentations to consumers, advocates and the general public; Fair
 housing training for property owners and managers, real estate agents and other members of the
 housing industry; Fair housing technical assistance and professional support to government agencies,
 civil rights organizations, social service agencies and housing providers; and Development and
 distribution of fair housing educational materials.
- Fair Lending Program: Investigates allegations of predatory lending, mortgage rescue scams and other fair lending violations; Monitors financial institutions, fair lending practices and compliance with the federal Community Reinvestment Act; Provides information to financial institutions on how to improve service to low and moderate income communities and people of color; and Provides

- technical assistance and education on fair lending and foreclosure prevention to lenders, policy makers and the general public.
- Inclusive Communities Program: Technical assistance and professional support to community
 organizations, developers and local policy makers on inclusionary housing policies and the promotion
 of racial and economic integration; Assistance with consumers' access to pro-integrative housing
 choices; and Research, analysis and documentation of fair and affordable housing opportunities and
 impediments.

Legal Action of Wisconsin provides free legal services to low-income people. Their housing programs focus on securing and protecting safe, affordable and decent housing; preventing homelessness and eviction; preventing and protecting against foreclosures; ensuring that the government enforces tenant protection laws; and securing and protecting tenants' rights to public and subsidized housing. They also host the Eviction Defense Project (EDP), a court-based, free legal aid program for low-income tenants who are facing eviction, and are a key partner in Milwaukee's Rental Housing Resource Center, which launched in late 2020.

Legal Aid Society of Milwaukee represents vulnerable city residents who have been victims of predatory lending practices and face other housing issues. They provide direct representation and assist people with the following issues: Tenant-Landlord disputes and Eviction defense; Foreclosure defense, mediation, negotiating loan modifications, loan modification enforcement; and Adults faced with consumers actions such as garnishments, student loan issues, car loan fraud, repossessions, sales/contract fraud, identity theft, etc. They are also a key partner in Milwaukee's Rental Housing Resource Center, which launched in late 2020.

Mediate Wisconsin specializes in housing mediation, promoting housing stability by affording all parties a civil and respectful means to resolving housing-related disputes. Since 2012, Mediate Wisconsin expanded services to support the need for foreclosure mediation by homeowners and support the Wisconsin Foreclosure Mediation Network. In 2017 they added services for tenants and landlords seeking an alternative to eviction in Milwaukee and are a key partner in Milwaukee's Rental Housing Resource Center, which launched in late 2020. Mediation services are offered for free or very low-cost, and they work with a number of community partners to meet the needs of low-income residents in Milwaukee.

Other Tools

TITLE II of the Americans with Disabilities Act of 1990 (ADA) prohibits discrimination against persons with disabilities in all services, programs and activities made available by State and local governments. CDGA includes this language in all contracts with funded organizations.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against persons with disabilities and requires that a percentage of funded projects be handicapped accessible. CDGA will continue to routinely review plans for multi- family housing and facilities where CDGA-funded services are provided to ensure accessibility and participation by disabled persons.

Section 8 – Rent Assistance Program provides resources to very low-income residents. The Housing Authority of the City of Milwaukee (HACM) receives funds from HUD to operate its Rent Assistance Program (RAP). RAP pays rental subsidies to private landlords who rent to very low-income tenants in the program. Under the Housing Voucher Choice Program, units cannot exceed HUD's fair market rents, meaning that rents

must be determined reasonable in relation to other units in the area. In the voucher program, tenants are able to rent units which have rents from 10% to 20% above fair market value when they locate to a "non-impacted" area - where fewer than 40% of the families are below the poverty level.

Housing Choice programs provide: orientation briefings to explain fair housing law, client location options and additional services; general counseling to families regarding housing choices and housing search skills; direct tenant referrals to available units in non-traditional areas resulting in the pro-integrative placement of families; and, the recruitment of new owners of units in non-traditional areas. During orientation and counseling, all RAP applicants will be informed that they could seek housing anywhere they choose and will also be informed of the portability provisions of vouchers and the advantages of locating to a non-traditional area. Listings of housing units will be provided to applicants, including many in non-traditional areas. Also, a list of wheelchair accessible units will be made available upon request for those in need.

HACM will continue participation in programs such as Opportunity MKE, which is a partnership housing mobility program with the goal of assisting households in accessing low-poverty, high-opportunity neighborhoods and communities. Housing Choice Voucher families that enroll in Opportunity MKE have 50/50 chance of receiving the mobility services.

General Fair Lending and Housing Practices: In addition, the City will continue its commitment to city-wide fair housing programs to help ensure accountability in lending by government-chartered lending institutions in the areas of: home purchase, home improvement and business loans, employment and promotional opportunities and contracting opportunities for minority and women-owned businesses.

SP-60 Homelessness Strategy - 91.215(d)

[1] Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

From a systems perspective, the overall strategy is to strengthen Milwaukee's homeless prevention programs and services, so the number of people entering the emergency shelter and transitional housing decreases. More focus can then be on programs such as Rapid Re-Housing and placements into stable/permanent housing. The City of Milwaukee and Milwaukee County Continuum of Care (CoC), programing, and other service providers are committing to pursuing seven critical efforts:

- 1. Prevent Homelessness
- 2. Increase Outreach
- 3. Assess and Adapt Emergency and Transitional Housing Capacities
- 4. Secure Safe Emergency Shelter
- 5. Transition to Permanent Housing
- 6. Shorten Homelessness Duration
- 7. Monitor Needs Specific to Covid-19

Each of these areas is described below, aligned with the four parts of this section: (1) Outreach and Assessment of Needs of people experiencing homelessness; (2) Strategies for Emergency Shelter and Transitional Housing Needs; (3) Use of Rapid Re-Housing and Permanent Housing; and (4) Homeless Prevention efforts.

Milwaukee's Coordinated Entry (CE) system is now fully implemented for families and single women and men. CE will function as a one-call system operated by 211, accessible via phone call, text message, online, and walk-in navigation centers. It is a gateway to the full array of homeless services, including prevention, rapid re-housing, emergency shelter, and permanent supportive housing with services directed to homeless individuals and families in greatest need. [http://milwaukeecoc.org/seeking-shelter-or-housing/]

Strategy: Increase Outreach

Outreach helps people exit to permanent housing from places not meant for human habitation *(unsheltered settings)*. Improvements can be observed annually in the System Performance Measures report submitted to HUD.

Coordinated Entry combined with outreach ensures that CE is the first point of contact, widely publicized and utilized by all homeless serving organizations and residents of the entire city/county. CE allows for people at risk to seamlessly access prevention services relating to basic needs, income, employment, transportation, and other assistance as soon as possible. Specific examples of CE actions are the dispatching of outreach staff to 211 callers on the street and the coordination of appropriate services for those fleeing domestic violence. CE will use a priority ranking system per the Emergency Solutions Grant (ESG) manual, which states:

"...So that any persons be eligible to receive assistance through the Emergency Solutions Grant (ESG) program, all must have an initial assessment completed with a case manager or authorized representative (211 Call Center, Mobile Screener, or Street Outreach worker) who can determine the appropriate type of assistance to meet their needs."

"...Individuals and Families will initially be evaluated using the standardized Coordinated Entry Crisis Housing Assessment housed at IMPACT Alcohol and Other Drug Abuse, the Coordinated Entry administrator for the local Continuum of Care.

The Coordinated Entry Crisis Housing Assessment is the ranking system used to identify the greatest need and make the most appropriate service match. Prevention and supportive services are referred to individuals and families whose current housing situation can be sustained with assistance.

Outreach efforts and Coordinated Entry are the foundation for a strong and effective homeless services system. CE manages the prioritization of referrals to shelter and permanent housing programs funded by CoC and ESG. Linking people at imminent risk of homelessness with resources to sustain permanent housing in the community is a critical component of an early intervention system. Ensuring people who have no option other than emergency shelter are referred to the most appropriate setting is also essential. The initial focus of CE was on emergency shelters. The next and most recent point of focus was on permanent supportive housing. With these systems functional, the following focal points will be systemic diversion and homelessness prevention services, with CE being the conduit for information sharing and services referral.

Outcome: 3,600 CE callers served annually

Street Outreach will continue to be provided to homeless adults and youth. Outreach will engage homeless people on the street, in parks, under bridges, encampments, and abandoned buildings. Outreach workers will provide food, clothing, and personal care items as immediate assistance and connect the homeless with HIV testing, substance abuse services, benefits assistance, access to shelter, transitional housing, safe- haven, rapid re-housing, and permanent supportive housing. Collaboration with nonprofit outreach providers and law enforcement will continue.

Outcome: 1,000 homeless encounters annually

School-based Outreach will continue to be provided to children and families via a designated homeless outreach contact at each school that can facilitate enrollment in Milwaukee Public Schools' Homeless Education Program (HEP). Online and central office enrollment will also be offered. HEP-enrolled families will receive McKinney-Vento services, including free breakfast/lunch, before/after school programs, tutoring, fee waivers, free books/materials, ESL, school health, special education, and other services. HEP will also refer families to Coordinated Entry and other community services as needed. With the closure of schools due to the COVID-19 pandemic, additional outreach strategies will be explored to connect with families who may be facing housing insecurity.

Outcome: Reach 5,000 homeless students annually

Estimating Future Homelessness: Additionally, the CoC is currently developing a tool to estimate future homelessness using technical resources available through HUD. It will help provide the Milwaukee CoC with a way to monitor a handful of data sets for potential entries into the homeless system, and then activate support in other institutions and/or systems with prevention strategies.

[2] Addressing the emergency shelter and transitional housing needs of homeless persons.

Strategy: Assess and Adapt Emergency and Transitional Housing Capacities

There is a known lack of safe emergency spaces for the homeless. Emergency shelter and transitional housing are resources for individuals and families in greatest need who have no other housing option in the community. Our current focus is to create and access more permanent housing so individuals experiencing homelessness can be transitioned more quickly out of shelters, which allows the current number of shelter beds to serve more people.

The importance of emergency warming and cooling rooms is growing in response to more extreme weather patterns. In 2020, the Point In Time methodology was adjusted to count guests at warming rooms as sheltered rather than unsheltered, which is where they were traditionally counted.

In response to COVID-19 and with emergency funds provided by the federal and state governments, shelter capacity was expanded rapidly to accommodate social distancing requirements. This emergency effort warrants further examination as a potential long-term response to addressing homelessness.

The CoC is pursuing the following activities to improve the effectiveness of existing Emergency and Transitional Housing:

- 1. Enhance low barrier shelter models that serve a population of people with a high acuity of needs, the majority of whom have a mental health condition, by promoting partnership and adding service capacity that may be available through the Milwaukee County Behavioral Health Division, to support the shelter's efforts to offer a level of care needed.
- 2. Explore options for adding specialized employment and benefits case managers to shelters to improve shelter guests' housing options, allowing for turnover in shelter and availability of shelter beds for folks staying outside.
- 3. Engage landlords in working with supportive housing programs to improve inventory available for local programs.
- 4. Encourage tenant workshops in shelters to prepare guests for renting an apartment (with or without a housing program).
- 5. Secure private funding for smaller costs that are barriers to housing, like application fees.
- 6. Encourage housing navigator specialization in case managers attached to street outreach or emergency shelter programs.
- 7. Work with HOPWA grantees to ensure that individuals with HIV/AIDS have access to stable housing, which is critical to ensuring they are better able to access medical care and supportive services.
- 8. Continue using the "Moving On" strategy as a means to increase openings in CoC permanent supportive housing (PSH). This entails working with other mainstream housing programs (public housing, Housing Choice Voucher, etc.) to transition PSH clients to stable housing but no longer need intensive services.

Current capaCity of emergency shelter and transitional housing beds can be found in MA-30 (Homeless Facilities and Services), Table 43: Facilities and Housing Targeted to Homeless Households.

<u>Outcome: 1,400 people served as members of households; 2,800 people served as single adults annually with the number decreasing over the next five years</u>

[3] Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Strategy: Secure Safe Shelter

Rapid Re-Housing (RRH) is a strategy intended to reduce the reliance on emergency shelter and transitional housing and increase successful placement in permanent unsubsidized or supportive housing in the community. RRH includes case management, and rent assistance (per the HUD definition) was implemented in 2018. Before this time, case management and rent assistance have been provided as separate programs by a network of homeless services providers. It is considered a leading strategy to get individuals and families stably housed quickly, with some case management. From 10/1/18 to 9/13/19, Rapid Re-Housing efforts served 1,084 individuals, including 513 heads of households, a proxy for families.

<u>Outcome: 1,200 served in 2020, with the number increasing every year over the next five years; Reduction in Length of Stay.</u>

Strategy: Transition to Permanent Housing

By increasing access to permanent housing, the Milwaukee CoC seeks to ease pressure on the shelter and transitional housing side of the system. The following activities will assist the CoC to help people find secure, stable housing:

- 1. Implement a policy to prioritize 100% of Permanent Supportive Housing (PSH) beds that become available through turnover for occupancy by people who are chronically homeless.
- 2. Continued project evaluation for a number of exits to permanent housing.
- 3. Continue to utilize current Safe Havens sites as an alternative permanent housing option to add needed capacity to the system.
- 4. Work with service providers to secure PSH/permanent housing for families with children, and special needs populations, particularly people with disabilities, seniors, and individuals living with HIV/AIDS.
- 5. Engage additional veterans service providers to collaborate with the CoC on connecting veterans to services and programs that increase housing stability as described in NA-40 and NA-45.
- 6. Work with the Housing Authority of City of Milwaukee (HACM) to utilize a percentage of available housing or housing vouchers to assist CoC service providers in finding stable, permanent housing for people in shelter or transitional housing.

- 7. Support the establishment and operation of pilot projects that are funded by hospitals and HMOs in order to increase inventory of permanent supportive housing.
- 8. Continue to increase RRH inventory through funding made available due to federal relief programs such as the CARES Act in 2020.

Outcome: Current capaCity of PSH beds is 2,732 (also available in Table 43 in MA-30). Goal is to increase the number of PSH beds for Category 1 individuals identified as having the highest need.

Outcome: 200 persons served in Safe Havens as members of households; 400 people served as single adults annually, with the number decreasing every year over the next five years.

Strategy: Shorten Homelessness Duration

Efforts towards homelessness duration reduction will focus on individuals and families that are not already chronically homeless. Our data indicates the sooner one makes the transition to permanently affordable housing and independent living, the less likely that individuals and families will repeat the experience of homelessness. Key to our goal is CoC facilitating access for homeless individuals and families to affordable housing units while supporting preventing individuals and/or families from ever becoming homeless again.

[4] Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Strategy: Prevent Homelessness

A multi-pronged approach to homeless prevention takes the following actions:

- 1. Provide low-income housing specifically for families.
- 2. Provide ESG-funded homelessness prevention services, including housing relocation, stabilization, and tenant-based rental assistance.
- 3. Focus on low-income individuals and families who are more likely to become evicted; Extremely low-income individuals and families likely to become homeless due to severe housing cost burden; or those receiving assistance from public and private agencies that address housing, health, social, employment, education, or youth needs.
- 4. Advocate for and support eviction prevention efforts such as the newly formed Rental Housing Resource Center, increased access to mediation services to divert potential eviction filings; increased access to legal services; and an increase in the availability of temporary rent assistance funds.
- 5. Support targeted intervention efforts to achieve permanent housing placement for people leaving a system of care such as foster care, hospitals, mental health facilities, and corrections.

- 6. Provide secondary prevention via effective delivery of CoC/ESG-funded emergency shelter, rapid re-housing, transitional housing, safe haven, and permanent supportive housing that decreases the rate of return to homelessness.
- 7. Identify and address barriers to fair housing choice.
- 8. Incorporate homeless prevention in jurisdictions' Consolidated Plans and provide City and County CDBG support for foreclosure and eviction prevention programs operated directly by jurisdictions and community-based organizations.
- 9. Support for the development of a tool to estimate future homelessness, which will help provide the Milwaukee CoC with a way to monitor potential entries into the homeless system, and then activate support in other institutions and/or systems with prevention strategies.
- 10. Develop and implement a focused CoC-wide effort to reduce the rate of return and monitoring progress for individual providers and the system.

<u>Outcome: Reduce the number by 5 % of individuals and families that become homeless, as seen in annual System</u>
<u>Performance Measures.</u>

Reduction in the Rate of Return will continue to be tracked using an HMIS-generated Rate of Return (RoR) report to identify homelessness or return to the shelter after exiting any CoC-funded housing program. The CoC will also continue to use RoR as a criterion in the annual HUD renewal project ranking. Currently (2019), CoC projects had the following Rates of Return (12-month): Street Outreach (20%), Emergency Shelter (25%), Permanent Supportive Housing (11%), Transitional Housing (8%), Safe Haven (18%), and Supportive Services Only (21.0%). The plan to reduce the Rate of Return includes:

- 1. Increasing income through the utilization of cash and non-cash mainstream resources including SSI/SSDI.
- 2. Utilize the expanded SOAR training capacity to improve the skills and services of case managers.
- 3. Increasing employment through collaboration with employment service providers; particularly those specialized to serve people with disabilities and mental health conditions.
- 4. Achieving maximum enrollment in Affordable Care Act health insurance.
- 5. Improving access and utilization of mental health and substance abuse services.

Outcome: Reduction in rate of return to national best practice levels or less than 55 days.

Strategy: Monitor Needs Specific to Covid-19

With the advent of the COVID-19 pandemic, the Milwaukee CoC has mobilized in a significant way to transition people from the streets to safe housing. The strategies described above were activated and utilized in a variety of ways, and in coordination with service providers across sectors, both within and outside of the CoC. The lesson learned is that with appropriate resources and coordination, we are able to effectively address much of the homelessness challenge. Identifying ways to carry forward these lessons into longer-term homelessness prevention strategies will be a new focus.

Addressing homelessness within the context of COVID-19 and racial justice

Recent research and guidance from the National Alliance to End Homelessness (NAEH) identifies four phases and essential actions that CoC's can take while addressing homelessness in the context of two very critical issues: public health and racial justice. These include a focus on:

- Equitably protecting all people experiencing unsheltered and sheltered homelessness from COVID-19 infection and illness.
- The effective and equitable use of resources to re-house people.
- Reducing new entries into homelessness through diversion and prevention strategies.
- Strengthening systems to be better prepared for future crises and for achieving racial justice and equity.

While there is still much work to be done in the homeless services field to address racial justice and equity, the Milwaukee CoC and City of Milwaukee is committed to close gaps in systems of care that lead to disparities. People of color – especially Black and Native communities – are overrepresented within the population experiencing homelessness, in large part because of historical and systemic racism. People who identify as lesbian, gay, or bisexual are also overrepresented and face discrimination; Transgender individuals in particular face distinct discrimination across a variety of systems and service points. Further, it is already clear that people of color and people from marginalized communities are disproportionately impacted by the coronavirus.

It is critical, therefore, that planning, design, and implementation of responses to COVID-19 aim to close gaps in systems of care that lead to disproportionate outcomes. Communities are identifying ways to consult the people most impacted through incorporating lived experience strategies in program and outreach design. The NAEH has developed a framework to help communities focus on these issues, which will be helpful beyond the short-term impacts of the COVID-19 pandemic.

SP-65 Lead-based paint Hazards – 91.215(i)

Actions to Address LBP Hazards and Increase Access to Housing without LBP hazards

The Milwaukee Health Department (MHD) operates a full service Childhood Lead Poisoning Prevention Program (CLPPP) responsible for tracking lead poisoning within the City, providing interventions to children who are lead poisoned (including case management and risk assessment services), conducting and monitoring lead abatement, and providing guidance, coordination, and policy recommendations.

The MHD houses these activities in the Division of Disease Control and Environmental Health. They are divided into **Primary Prevention** (mitigating lead hazards before a child becomes exposed) and **Secondary Prevention** (mitigating lead hazards and minimizing adverse effects of health after a child has been lead poisoned) efforts.

[1] Case Management Services and Property Abatement

The Home Environment Health Division (HEH) provides case management services to children tested and reported with elevated blood lead levels and performs investigations and abatements of properties with lead hazards. The source of a child's exposure is identified in the child's environment through the completion of a lead inspection and a risk assessment. If lead hazards are identified, the program issues written orders, monitors the lead hazard abatement by a state certified lead abatement contractor, and assures the hazard is mitigated through clearance testing.

The program manages a Healthy Homes grant and administers funds to assist property owners with the expense of abating other health and safety hazards in the home. In 2019 the City was awarded a total of \$5.6 million from HUD's Lead Based Hazard Reduction Program and Healthy Homes Production Grant Program, which can be used over a period of 42 months. This grant will be used in conjunction with additional funds allocated by the City in its annual budget for lead abatement and reduction.

[2] Community Education and Screening

The program works to educate the community and medical providers around the risks of lead and the need to screen children for lead poisoning. In addition, the City of Milwaukee Water Quality Program is housed in this division. The program works with community partners to distribute water filters to individuals whose homes are served by lead laterals and conducts water sampling in homes, schools, and child care facilities to check for lead. In 2016 the City launched the "Lead-Safe Milwaukee" campaign, which provides information to the public on lead-based hazards (paint and water) and tips for keeping children safe through testing. [https://city.milwaukee.gov/LeadSafeMKE#]

[3] Increase Awareness of Lead-Safe Work Practices

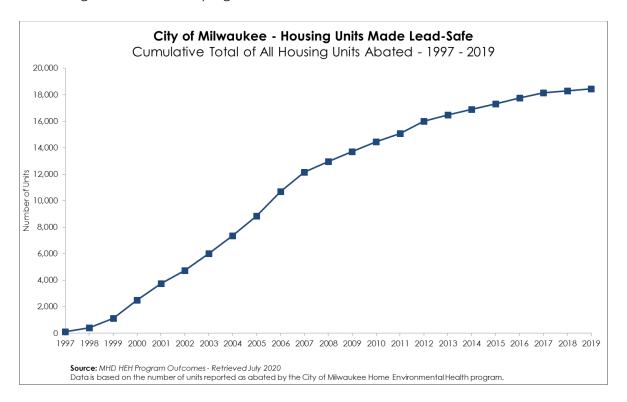
MHD works with other City Departments (CDGA, Department of Neighborhood Services (DNS) and the Dept. of City Development) and community partners on efforts to increase awareness of the EPA Lead-Safe Rule and integrate lead-safe work practices into City housing projects.

Effective April 22, 2010, EPA's Lead-Based Paint Renovation Repair and Painting (RRP) Rule was put in place to protect the public from lead-based paint hazards associated with renovation, repair and painting activities. These activities can create hazardous lead dust when surfaces with lead paint, even from many decades ago,

are disturbed. The rule requires workers to be certified and trained in the use of lead-safe work practices, and requires renovation, repair, and painting firms to be EPA-certified. Renovation is broadly defined as any activity that disturbs painted surfaces and includes most repair, remodeling, and maintenance activities, including window replacement.

Program Outcomes

As of December 30, 2019, a total of 18,456 housing units in the City of Milwaukee have been made lead-paint safe through the MHD CLPPP program.



How are the actions listed above related to the extent of lead poisoning and hazards?

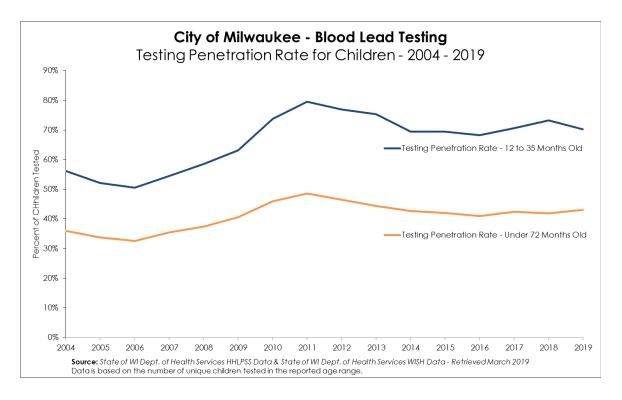
As described in MA-20 (Condition of Housing), over 80% (around 229,000) of the housing units in the City were built before 1980, which indicates the potential for lead-based paint hazards in a significant number of city housing units. About half of that number (54%) were built before 1950. The Community Advocates healthy housing report also notes that Milwaukee's lead exposure risk is among the highest in the nation and disproportionately affects low-income neighborhoods, estimating there are likely over 120,000 housing units that could have lead-based paint hazards based on the age of Milwaukee's housing stock (p. 42).

A recent audit of the MHD CLPPP from the Public Health Foundation (March 2020) found that overall, Milwaukee has a high burden of lead poisoning when compared to many other U.S. cities and states, consistently averaging 2,500+ positive childhood blood lead tests each year and over 100 of these meeting the state statute definition of an "elevated blood lead level." Lead based paint and household dust remain the primary sources of lead exposure for children in Wisconsin. Removing lead paint hazards from older housing provides a \$1.39 return for every \$1 invested, in addition to protecting children and families. Additionally,

several Milwaukee districts have significantly higher numbers of children with lead poisoning and could be considered "hot spots."

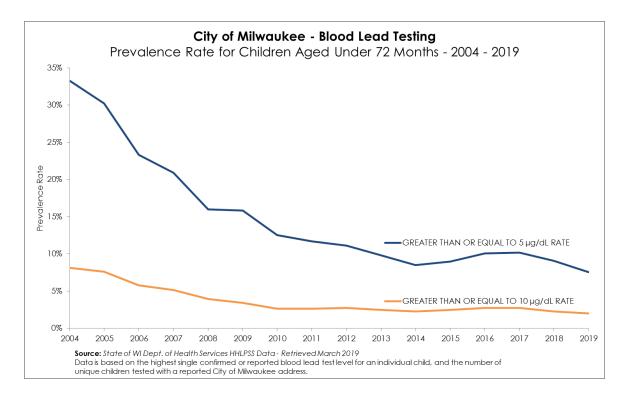
The MHD utilizes data from Wisconsin on the number of children enrolled in Medicaid for their outreach on lead-based hazard testing. It is estimated that 85% of the children in the Milwaukee area under 72 months are enrolled in Medicaid. While the rate of lead poisoning has declined dramatically over the past two decades as a result of targeted interventions, the testing rate has remained stable. However, COVID-19 has also impacted the City's ability to test children for lead exposure, with testing rates down by an average of about 33% due to the pandemic and public health restrictions.

There are many potential sources of lead poisoning and hazards, with the most important being deteriorating lead-based paint/dust, lead in drinking water (in homes with lead service lines or plumbing), and lead in soil. The MHD prevention efforts include all three of these sources, and are consistent with national recommendations.



Data Source: https://city.milwaukee.gov/Health/Reports-and-Publications/Lead-Poisoning-Prevention-Data

Testing Penetration is defined as the percentage of children in the City of Milwaukee (identified as aged 12 through 35 month old and as aged less than 6 years old) who were reported to be tested at least once in any calendar year. These percentages are based upon the number of blood lead tests reported and the total number of children estimated by the reported birth rate.



Data Source: https://city.milwaukee.gov/Health/Reports-and-Publications/Lead-Poisoning-Prevention-Data

Prevalence is defined as the number of children less than 6 years old who have exceeded a limit of lead in the blood (identified at 5 μ g/dL and 10 μ g/dL) divided by the total number of children tested for lead in their blood and expressed as a percentage. The time period and age category must be identical for both.

How are the actions listed above integrated into housing policies and procedures?

The Milwaukee Health Department has several initiatives that integrate the prevention of lead poisoning among children in Milwaukee and increasing the availability of safe and habitable housing that includes: 1) Community awareness through outreach and education; 2) Assuring inspections and monitoring of lead abatement projects; 3) Providing environmental inspections and nursing case management for lead-poisoned children; 4) Working closely with Lead Abatement Contractors to assure lead-safe work practices; and, 5) Providing quality data surveillance of blood lead results for investigations.

The city has had a successful lead abatement program for over two decades. In 2018 a number of internal and external audits were conducted of the MHD CLPPP, finding program deficiencies in oversight and management leading to a decrease in successful outcomes. This resulted in a "stop work order" by HUD in 2018, during which time the MHD began to address items in the audit and monitoring. This led to successful restoration of funding and new grants in late 2019. The most recent audit was completed by the Public Health Foundation in March 2020, and provided a series of improvements and additional recommendations related to findings that can assist the MHD to more effectively integrate the CLPPP with other city housing policies and procedures.

In order to continue to ensure that Milwaukee children will not be lead-poisoned and that children that are lead poisoned receive appropriate Public Health interventions, the program has several challenges; including

attracting and maintaining a fully-trained staff, increasing program funding while reliant primarily on grant awards, establishing a strong, stable, and qualified contractor base, limited options for immediate relocation of families upon discovery of lead poisoning; and working with other City Departments to assure that housing projects in Milwaukee always include assessments for lead and lead-safe remediation.

<u>CONSOLIDATED PLAN STRATEGIC GOAL</u>: Evaluate and reduce lead-based paint hazards and their effects with the long term goal of eradicating childhood lead poisoning in the City of Milwaukee.

<u>Implementation Strategies Include</u>:

- 1. Assure compliance with the HUD Lead Safe Housing Rule and EPA Renovation Repair and Painting (RRP) rule by providing information, education, and training to property owners.
- 2. Continue to produce lead-safe housing units in the City of Milwaukee utilizing all available funding; provide grant subsidies to assure the safe remediation of lead-based paint hazards in housing units.
- 3. Provide investigations and case management to lead-poisoned children and their families in Milwaukee.
- 4. Collaborate with other City agencies; Department of City Development (DCD) and Dept. of Neighborhood Services (DNS), with the goal of increasing lead-safe housing that is safe and habitable for Milwaukee families, particularly in high-risk target areas (i.e. districts that have significantly higher numbers of children with lead poisoning).
- 5. Involve community organizations and members most affected by the problem in neighborhood-based strategies.
- 6. Increase the awareness and importance for lead testing of children; a minimum of 3 blood lead tests before the age of 3.
- 7. Work with other networks in the rental housing space to assist with relocation needs for families upon discovery of lead poisoning, particularly if abatement activities will take a significant amount of time.
- 8. Continue to work on developing a strong staff training and retention strategy for the CLPPP, including consideration of adding positions that can assist with case management and housing construction practices.
- 9. Diversify and increase funding to make homes lead-safe before a child is poisoned. The average cost of lead abatement per housing unit is \$4,000 when working with the property owner to assure no open building code violations and property taxes are current. In the March 2020 audit report it was noted that removing lead paint hazards from older housing provides a \$1.39 return for every \$1 invested, in addition to protecting children and families.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs, and Policies for reducing the number of Poverty-Level Families

The City of Milwaukee's Anti-Poverty Strategy is focused on the expansion of opportunity in the areas of education, employment, economic development and housing. As illustrated throughout the Consolidated Plan, raising median household income through increasing access to family-supporting/livable wage jobs is the most important element in eliminating poverty and providing households with adequate income to invest in their housing and neighborhoods. Additionally, the economic impacts of COVID-19 on household income have had a disproportionate impact on low-income households and communities of color.

The city has increasingly targeted local and federal resources toward concerted efforts to create and retain jobs; as well as generate economic activity in specific areas of Milwaukee affected by years of financial disinvestment. The city actively seeks creative ideas to source new forms of revenue and improve efficiency in current programs to maintain existing service levels. At the same time, city departments are working collaboratively with the nonprofit sector to advance innovative poverty reduction programs.

Additional federal and state resources as part of the response to COVID-19 (i.e. CARES Act and potential future relief funds) are being utilized in ways that strongly align with housing and economic development strategies articulated in this Consolidated Plan. There is also a significant amount of coordination with the area's philanthropic community, as part of the MKE Civic Response Team and MKE Responds fund.

In the Community Survey, respondents were asked to indicate where the highest need for investment was in terms of economic opportunity. Employment Services (job training and placement) was rated as the highest need, with youth internship programs, and assistance for small businesses coming in (2) and (3) respectively. Focus group sessions also provided more context, including the need for better access to transportation, wraparound services to support employment programs (soft skills, child care, mentoring), increased pay and benefits, and building off of past investments in commercial corridors. Community input, along with additional market analysis research, is what drives the anti-poverty strategies and activities described below.

See sections NA-50 (Non-Housing Community Development Needs) and MA-45 (Non-Housing Community Development Assets) for additional detail and analysis.

<u>CONSOLIDATED PLAN STRATEGIC GOAL</u>: Expand opportunities in the areas of economic opportunity, housing and quality of life. Target local and federal resources toward concerted efforts to create and retain jobs, and generate economic activity in specific areas of the City affected by years of financial disinvestment.

All strategies below will be implemented with the goal of increasing the median household income for families living in poverty through increased access to employment opportunities and income supports that provide economic stability. Activities will be viewed with an eye towards generating economic activity directly, or leveraging employment and economic development activities with other community-based programs that assist in removing barriers for low-income persons, increase self-sufficiency, and provide wraparound services such as health benefits, education, life skills, legal services, employment, transportation.

[1] ECONOMIC OPPORTUNITY

- (a) Support programs that create livable wage jobs, increase resident incomes, and opportunities to build wealth (i.e. EITC, banking access, matched savings, financial education) to help reduce unemployment and under-employment.
- (b) Assist with training individuals for jobs in emerging and/or growth sectors (i.e. technical colleges, higher education, employer-based programs).
- (c) Provide workforce-based training, education, and mentoring (i.e. apprenticeships, Milwaukee Transitional Jobs Collaborative, HSED/GED, English proficiency programs) to increase participants' workforce skills.
- (d) Increase partnerships with those that offer supportive services to those seeking work to promote job stability and retention (soft skills, financial management, transportation, etc.).
- (e) Support programs in skilled trades, industry-related certifications, high-tech training, or have an apprenticeship component (i.e. lead abatement, OSHA, construction/rehab, WRTP/Big Step, YouthBuild, Milwaukee Builds).
- (f) Program and initiatives that provide support to people with disabilities and assist them with finding work opportunities.
- (g) Support for transitional jobs programs for released inmates and ex-offenders that assist them with finding work opportunities and successful re-entry.
- (h) Support public transit expansion and other transportation options such as rideshare that connect Milwaukee residents to jobs in outlying areas.
- (i) Support the Driver's License and Employability Program to assist low income residents in restoring driver's license privileges and improve employment opportunities.
- (j) Assist small businesses and microenterprises with technical assistance, access to capital through business lending and revolving loan programs, and job retention efforts.
- (k) Promote and market neighborhood retail/commercial districts to counteract "retail gentrification."
- (l) Work with community partners to implement improvement plans that strengthen the physical appearance, social and economic vitality of Milwaukee neighborhoods and commercial districts.
- (m) Work with community partners to strengthen local schools and early childhood education programs.
- (n) Support of community health centers, particularly to address the health impacts of COVID-19.

[2] HOUSING

- a) Expand affordable homeownership opportunities for residents; increase the availability of quality rental housing.
- b) Increase protections for tenants at risk for eviction and reduce the impact of involuntary moves that result in housing instability for residents.

- c) Provide support for civil legal services such as estate planning, legal mediation, eviction and foreclosure defense, and related consumer issues.
- d) Coordination and support for resources that assist owners to make home/property repairs and improve energy efficiency (i.e. weatherization, Me2, roofs, lead hazards).
- e) Support efforts to provide information and targeted relief to seniors and/or other homeowners at risk of displacement due to the impact of rising property taxes.
- f) Support for financial education and navigator programs that assist owners and renters with managing income and housing costs.

[3] QUALITY OF LIFE

- a) Promote programs that respond to social issues facing youth (i.e. education, employment/work experience, teen pregnancy, truancy, crime, violence).
- b) Foster community partnerships that work across sectors and involve residents, community-based agencies, schools, faith-based groups, businesses, government, and others to help improve the overall quality of life for families.
- c) Preserve and support programs and activities that build resident leadership and collective action (i.e. block watches, community organizing, business associations, crime prevention, landlord compacts, asset-based training) to strengthen and improve neighborhoods.
- d) Support approaches that address the root causes of violence, and promote opportunities for healing, restorative justice practices, and safe neighborhoods.
- e) Access to health care services, wellness programs, and healthy food outlets such as community gardens, neighborhood markets, farmers markets, etc.
- f) Maintain and enhance public spaces (parks, green spaces, streets, sidewalks) to support public safety initiatives.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City of Milwaukee has built a solid foundation of programs, services and activities that support economic development, neighborhood revitalization, and affordable housing initiatives. These efforts are guided by several important market trends and assumptions that make critical connections between the Housing, Community Development and Anti-Poverty strategies outlined in this plan:

- 1. **Median household income has fallen over the last two decades.** In real dollars, households earn \$6,000/year less than they did in 2000. The median household income in the City is significantly lower than surrounding communities, and poverty and unemployment rates are significantly higher in the City than in the metro area. Wisconsin is one of twenty-one states with a minimum wage equal to the federal minimum (\$7.25 per hour). Based on Federal housing affordability guidelines, a person would have to work 91 hours per week at that rate to afford a home at the median rent cost in Milwaukee County.
- 2. **Household income has not kept pace with the cost of housing.** One of the most significant barriers to affordable housing in the City of Mllwaukee is that household income has not kept pace with the cost of housing. More people are spending a significant amount of their income on housing costs and generally have difficulty finding safe and decent housing in the private market. Additionally, about 77,000 (or 34%) of City households earned less than \$25,000 in 2017 and experienced a more severe housing cost burden.
 - Additionally, the significant decline in both the number and percentage of households that owned their own homes since the Great Recession, along with an increase in investor-owned properties has created barriers to affordable homeownership in the market. The city's older housing stock presents challenges as the cost of home repair/maintenance can be prohibitive for low- to moderate-income households and/or owners with high monthly housing costs. Until household incomes start to rise and the poverty rate begins to decrease, affordability will continue to be a challenge for many households.
- 3. Racial disparities in income, homeownership, poverty, housing cost burden, and unemployment remain persistent. There is a recognition in the City of Milwaukee that local government has a significant role to play in engaging all residents, stakeholders, and community partners in racial justice work. For example, the City has begun to look more holistically at homeownership and housing programs, and employment and workforce challenges by recognizing that issues such as trauma and incarceration play key roles in employability, particularly for black males. SEWRPC's equity analysis found that if the transit recommendations in VISION 2050 (the long-range regional transportation and land use plan) were implemented, four times as many people of color, families in poverty and/or people with disabilities would have access to jobs.
- 4. The creation and retention of family-supporting jobs is critical to poverty reduction strategies. Throughout the Consolidated Plan, the importance of this in terms of reducing unemployment and under-employment is emphasized. The creation of jobs, the matching of jobs to the skills of the labor force, utilization of sector-based strategies, and the location of jobs are all fundamental components of the anti-poverty strategy, notwithstanding the fact that much of Milwaukee's economic future will be determined by regional and global economic forces rather than local decisions.

There is much space for improvement to upskill and retrain workers to be more competitive in the labor market. Manufacturing, which generally pays higher wages, is the second largest sector for employment in Milwaukee, the sector has continued to lose jobs over the past two decades. Over that same time period, jobs in lower-paying sectors have been added in the local economy. The fastest growing sector continues to be health care/social assistance, which pays an average wage that is less than manufacturing.

- 5. **The opportunity to work, prepare for work,** and/or contribute to the community's improvement should be built into every program providing services to people living in poverty. Policies and programs that focus on work such as transitional jobs, wage increases, access to income supports such as the Earned Income Tax Credit (EITC) and child care services all provide the support families in poverty need to stabilize housing and increase self-sufficiency.
- 6. Programs which support strong families, strengthen financial stability, and promote safe neighborhoods can help create environments conducive to investment and economic development. Greater linkage between business activity, social services, community organizing, and local government activities can maximize resources and significantly enhance the impact of public dollars.
- 7. Successful efforts to reduce poverty, particularly in targeted neighborhoods, require the combined efforts of the public sector funding and services, nonprofit and business. Collaborative efforts provide the level of sustained investment and the breadth of skill needed to achieve significant reductions in the level of poverty.
- 8. **The investment in human capital is critical.** This means working cooperatively with Milwaukee Public Schools, colleges and universities, and employment and training programs to continuously improve the quality of Milwaukee's labor force and to enhance individual economic opportunity. In many instances, strengthening individual financial stability requires one-on-one case management, multiple social services, and housing assistance, in addition to education and training resources.
- 9. The COVID-19 public health pandemic continues to generate economic impacts that are putting more residents and families at risk for financial and housing insecurity. Not only will these effects continue for the unforeseen future, but they have already had a disproportionate impact on low-income households and communities of color, which exacerbate existing disparities in accessing safe, affordable housing.

While the community-wide response has been collaborative and strategic (particularly in terms of infusing new resources to address these challenges) many of the service providers and businesses that are an integral part of the community and economic development ecosystem are also at risk.

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

MONITORING

With a focus on ensuring compliance with program requirements, the City of Milwaukee's Community Development Grants Administration (CDGA) will include program requirements in all contractual agreements, sponsor orientation sessions, provide technical assistance (one-on-one, small group settings, and/or on-site) at the beginning of the program year as well as when programs are underway. CDGA defines clear expectations regarding performance standards and policies and procedures to follow. These efforts involve new subrecipients, new staff of existing subrecipients, existing subrecipients experiencing compliance issues, and existing subrecipients undertaking new activities.

CDGA will continue to monitor and evaluate activities to be carried out in furtherance of the Consolidated Plan and in meeting goals and objectives set forth in the Annual Action Plan. CDGA monitoring staff utilize a detailed monitoring process, which includes extensive reporting of grantee activity. As a condition of payment (on a reimbursable basis), agencies will be required to submit monthly financial and program activity reports. CDGA monitoring staff review these reports to determine that submitted costs are eligible and that the funded activity is being performed to a satisfactory level.

Additionally CDGA monitoring staff maintain extensive contact with funded agencies and provide technical assistance to groups where needed. Agencies needing additional technical assistance will be referred to the CDBG-funded technical assistance providers for additional and ongoing assistance to help improve agency efficiency and accountability. For example, CDGA funds the provision of technical assistance to funded subrecipients to include management, financial operations and board/staff development.

Informal and formal monitoring visits will be conducted to ensure compliance with program requirements. Risk assessments and in-house desk audits will be performed annually of all funded agencies.

The City Comptroller's office, the fiscal arm of CDGA, will conduct annual financial audits of all funded groups and monitor the timeliness of expenditures.

In addition to the monitoring conducted, CDGA will ensure compliance with all program regulations for all funding sources, including CDBG, HOME, ESG and HOPWA.

INSPECTIONS

The City's Department of Neighborhood Services (DNS) will inspect and verify tenant income levels in HOME-assisted units and document the results, in compliance with the Federal regulations and during the applicable period of affordability. In addition, DNS will inspect properties during the compliance period to ensure that properties remain in a decent, safe, and sanitary condition. Approximately 150 properties will be

inspected by DNS per annum. The Department of Neighborhood Services will provide onsite building inspections and general project oversight as follows:

- 1. <u>Scope Review and Preparation:</u> For rehabilitation projects, DNS staff will review the scopes of work provided by nonprofit organizations for completeness and accuracy. Staff will ensure that the scope of work includes all items necessary to bring the building into code-compliance and that the proposed materials to be used are of a reasonable quality and price. It is expected that this will require an onsite inspection by DNS staff to confirm the information contained in the scope provided.
- 2. <u>Interim Site Inspections:</u> DNS staff will inspect housing production projects to determine whether the amount of compensation being requested is justified, given the work actually completed. Inspections will verify that the work performed conforms with applicable codes and has been completed in a professional manner. The DNS inspector will also verify that required permits have been obtained and are properly posted onsite.
- 3. <u>Final Site Inspections:</u> DNS staff will inspect projects to determine whether the work items identified in the original scope of work have been completed and that any subsequent change orders are accounted for. The inspector will verify that all work has been done in conformance with applicable codes and has been completed in a professional manner. The inspector will also verify permit sign-off and that lead clearance has been provided by Milwaukee Health Department. Finally, the DNS inspector will issue a Certificate of Code Compliance (rehabilitation projects) or Occupancy Certificate (new construction) for the unit to the agency and CDGA.

As in previous years, a Memorandum of Understanding between CDGA and DNS on the scope of services for these activities will be finalized for each year's activities.

PERFORMANCE-BASED MEASUREMENT

In accordance with its Consolidated Plan, the City of Milwaukee will undertake activities to address identified neighborhood and community priorities in conjunction with the HUD Statutory Program Goals of:

- Decent Housing
- Suitable Living Environment
- Expanded Economic Opportunities

Additionally, CDGA will assess the performance and progress of funded agencies towards addressing the issues facing the low income areas in which they serve, in conformance with the HUD Statutory Program Outcomes as follows:

- Availability/Accessibility
- Affordability
- Sustainability

As part of this ongoing assessment of performance of funded programs, all funded agencies will be required to link and then assess how their goals and activities align with HUD program goals and outcomes. Funded agencies will also be required to collect data associated with proposed outcomes and submit to CDGA.

Monthly performance reports are required of all funded groups. In addition, funded agencies will also be required to submit a final year-end report detailing their accomplishments and providing a self assessment of their funded activities along with backup documentation.

It is understood that the development and implementation of a performance measurement system will continue to be an evolving process, in which CDGA will continue to work with funded agencies to identify realistic outcomes that relate to funded activities.

CDGA will analyze the data collected from funded agencies to help determine the effectiveness and efficiency of funded programs in Milwaukee neighborhoods.

Components of CDGA's Performance Measurement System				
Project Activity Work Plan Components	 Activity to be performed Timetable to perform the activity Method to be utilized to perform the activity Agency Mid-Term Outcomes expected from the funded activity (includes number of units upon completion of project/activity) Agency Long-Term Outcomes expected from the funded activity (includes the benefits that result from a program). Outcomes typically relate to a change in conditions, status, attitudes, skills, knowledge or behavior. Common outcomes could include improved quality of life for program participants, improved housing stock, economic vitality, increased property values, reduced crime. 			
Outcome Measurement Work Plan Components	 Identified long-term outcomes Outcome measures Data source for expected outcomes Data collection methods for expected outcomes 			

OTHER COMPLIANCE ACTIVITIES

Section 108 Loan Guarantee: During the five year Consolidated Plan period of 2015-2019, the City may elect to utilize Section 108 funds. However, at this time, there are no projects identified.

Reprogramming Funds: Depending upon the availability of funds, additional activities may be funded through a Reprogramming cycle. The reprogramming funds, if available, will be spent on similar activities as identified in the 2020-2024 Consolidated Plan and subsequent Annual Action Plans.

Community Housing Development Organizations (CHDOs): As required by HUD, the City will meet the 15% HOME requirement of housing activities being performed by CHDOs.

CHDO Operating Funds: Agencies certified as CHDO's and funded during the period of the Consolidated Plan (2020-2024), will receive a reserve of CHDO operating funds. These funds will be used for operating costs associated with the delivery of HOME-funded housing production and rehab activities.

HOME Investment Partnerships: As required in § 92.254 of the HOME rule, the City of Milwaukee will primarily use Recapture Provisions for all its homebuyer activity, except in cases where the Resale Provisions are required, or when the Presumption of Affordability is requested for a particular project in advance. Recapture and Resale Provisions are clearly defined in the contract between the City and all subrecipients. It is enforced with an active covenant that is secured by a mortgage at time of closing, to ensure affordability of units acquired with HOME funds.

Period of Affordability: The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How to calculate the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

- a. <u>Period of Affordability Under Resale Provisions</u>: Under resale, §92.254(a)(5(i) of the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.
- b. <u>Period of Affordability Under Recapture Provisions</u>: For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods:

If the total HOME investment (resale) or direct subsidy (recapture) in the unit is:	The period of affordability is:		
Less Than \$15,000	5 years		
Between \$15,000 and \$40,000	10 years		
More Than \$40,000	15 years		

Resale Provisions: The HOME resale requirements are established in the HOME rule at §92.254(a)(5)(i). Under HOME resale provisions, the City will ensure that, when a HOME-assisted homebuyer sells his or her property, either voluntarily or involuntarily, during the affordability period,

- 1. The property is sold to another low-income homebuyer who will use the property as his or her principal residence;
- 2. The original homebuyer receives a fair return on investment, (i.e., the homebuyer's downpayment plus capital improvements made to the house); and
- 3. The property is sold at a price that is "affordable to a reasonable range of low-income buyers."

<u>NOTE</u>: If the City only provides HOME assistance to develop the unit and HOME funds are not used to lower the purchase price from fair market value to an affordable price, resale provisions must be used.

Ensuring Long term Affordability: The HOME Rule at §92.254(a)(3) requires that all HOME-assisted homebuyer housing be acquired by an eligible low-income family, and the housing must be the principal residence of the family throughout the period of affordability.

If the housing is transferred, voluntarily or otherwise, during the period of affordability, it must be made available for subsequent purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence. The HOME resale provisions must enforce these requirements as any housing assisted with HOME funds must remain affordable for the duration of the period of affordability.

Fair Return on Investment: The City's resale requirements will ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and certain capital improvements).

Presumption of Affordability: In certain neighborhoods, housing can be presumed to provide a fair return to an original homebuyer upon sale, to be available and affordable to a reasonable range of low-income homebuyers, and to serve as the primary residence of a low-income family during the period of affordability. In such cases, the City will not impose resale restrictions because the characteristics of the neighborhood make it probable that these requirements will be met without the imposition of the restrictions. Instead, \$92.254(a)(5)(i)(B) of the HOME rule states that the City may identify certain neighborhoods with housing and income conditions that will:

- 1. Provide ongoing affordable home prices,
- 2. Ensure that the sales price of a home will provide a fair return to the original homebuyer, and
- 3. Provide a pool of income-eligible homebuyers from the residents of the neighborhood.

Recapture Provisions: The HOME recapture provisions are established at §92.253(a)(5)(ii), and unlike the resale approach, permit the original homebuyer to sell the property to any willing buyer during the period of affordability while the City is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer.

<u>NOTE</u>: Recapture provisions cannot be used when a project receives only a development subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, resale provisions must be used.

Recapture Method: In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, **the City** will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided in the form of a deferred payment 0% interest loan. The loan will be forgiven prorata over the period of affordability (i.e., generally 5 years), as long as the home remains the principal residence of the home buyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, **The City** shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds are defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

HOME assisted units under Recapture Provisions should be sold at a reasonable fair market value.

Tenant-Based Rental Assistance: The City may elect to use HOME funds for Tenant-based rental assistance during the 2020-2024 period of the Consolidated Plan, given increasing housing cost burden for low-income households and the significant economic impact of the COVID-19 public health pandemic and resulting recession.

Describe the policy and procedures the PJ will follow to affirmatively market housing containing five or more HOME-assisted units.

Affirmative Marketing: In conformance with the HOME Final Rule 24CFR 92.351, the City has multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

The City of Milwaukee has an Affirmative Marketing Plan which is used to assist the City and its funded agencies on affirmative marketing procedures as required by federal regulations of the U.S. Department of Housing and Urban Development. This Plan details specific affirmative marketing and outreach that project sponsors must utilize for any HOME-assisted project of five or more units.

In addition, all CDGA-funded units are developed as turnkey style developments and must be affirmatively marketed by the agency to ensure that they are available to the general public. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status or disability.

The marketing of properties may begin anytime following feasibility approval by CDGA, given the availability of clear and concise information about the finished product. Critical information such as asking price, estimated appraised value, estimated housing costs, floor plans and drawings/renderings must be provided to all interested persons.

Acceptable marketing methods included:

- Community Homes Homeownership List
- Phone inquiries
- Signs on properties
- Internet (websites, social media promotion)
- Open house events at the property
- Homeownership fairs
- Cooperation with homebuyer counseling agencies

The pre-sale of housing units produced under the City's Housing Production program is permissible and encouraged. If a property is affirmatively marketed and an eligible buyer is identified prior to the completion of the project, an offer to purchase may be accepted by an agency. However, transfer of ownership may not occur prior to receipt of a certificate of occupancy or code compliance. Additionally, in the case of housing rehabilitation, lead clearance must also be obtained from the Milwaukee Health Department prior to ownership transfer.

Describe actions to be taken to establish and oversee a minority outreach program within the jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking, underwriters, accountants, and providers of legal services, in all contracts, entered into by the PJ with such persons or entities, public and private, in order to facilitate the activities of the PJ to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

Outreach to Minority and Women-Owned Businesses

Through its Small Business Enterprise (SBE) Program, the City of Milwaukee will continue its long and successful history of outreach to small disadvantaged minority-owned and women-owned businesses. The Office of Equity and Inclusion (OEI) provides assistance and direction to SBEs to maximize participation in city let contracts. The OEI increases involvement by encouraging advertising in community newspapers, using the City's E-Notify system to share contracting opportunities, promoting resources with the small business ecosystem which includes local diverse and ethnic chambers of commerce and other certifying agencies. In addition, the City of Milwaukee strongly encourages others to purchase from local (i.e. City of Milwaukee-based) vendors/contractors.

The OEI maintains an SBE-certified business directory for recipients to utilize and it is accessible through the City's website. The directory of over 200 businesses is available for public review and downloadable for ease of use at https://milwaukee.diversitycompliance.com/FrontEnd/SearchCertifiedDirectory.asp?XID=5959&TN=milwaukee.

Through the SBE Program, the OEI will continue to promote and encourage full and open competition to increase access to working capital for small, emerging disadvantaged businesses. The OEI will continue to inform minority and women-owned businesses about the City's certification program and process; identify ways to improve access to City, County and other contracting opportunities; and examine internal policies, programs and procedures with a racial equity lens.

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 [https://www.vision2050sewis.org/report]
- 40. "Working Our Way Out of Poverty" Project Community Advocates Public Policy Institute, March 2015. [https://ppi.communityadvocates.net/news-events/research.html]
- 41. Mid-Course Revisions: 10-Year Plan to End Homelessness Milwaukee Continuum of Care, January 2015. [http://milwaukeecoc.org/wp-content/uploads/2014/11/Mid-Course-Revisions-10-Year-Plan-Final.pdf]
- 42. Strong Neighborhoods Plan City of Milwaukee Department of City Development, 2014-2015. [https://city.milwaukee.gov/Strong]
- 43. Growing Prosperity City of Milwaukee, September 2014

 [https://city.milwaukee.gov/ImageLibrary/Groups/cityDCD/planning/plans/Economic-Growth-Plan/GrowingProsperityFullReport.pdf]
- 44. ReFresh Milwaukee, City of Milwaukee Sustainability Plan 2013-2023 Office of Environmental Sustainability, July 2013
 [http://city.milwaukee.gov/ImageLibrary/Groups/cityGreenTeam/documents/2013/ReFreshMKE_PlanFinal_Web.pdf]
- 45. Wisconsin's Mass Incarceration of African American Males: Workforce Challenges for 2013 John Pawasarat and Lois M. Quinn, Employment & Training Institute, University of Wisconsin-Milwaukee, 2013. [https://dc.uwm.edu/cgi/viewcontent.cgi?article=1008&context=eti_pubs]
- 46. Regional Housing Plan: 2035 Southeastern Wisconsin Regional Planning Commission (SEWRPC), March 2013. [https://www.sewrpc.org/SEWRPC/Housing.htm]

Community Engagement Summary

The Urban Economic Development Association of Wisconsin (UEDA) worked with the City of Milwaukee Community Development Grants Administration (CDGA) to engage a diverse array of residents, community-based organizations, local businesses, city departments and others to provide input into the 2020-2024 HUD Consolidated plan. The UEDA project team utilized a variety of engagement tools to invite residents and stakeholders to participate. This included both traditional and new forms of outreach methods:

- Creation of a public website (<u>ConPlanMKE.org</u>) to host basic information about the Consolidated Plan, survey tools, promote public meetings, and provide a tool for the public to request information.
- Distribution of a community survey (both paper/in-person and electronic) through various organizational networks.
- Use of social media, listservs, newsletters and the City's E-Notify system to promote the survey and public meetings.
- Established a Task Force of stakeholders and community leaders representative of key constituencies to provide guidance and assist with outreach.
- Hosted focus groups and community meetings in key Neighborhood Strategic Planning (NSP) areas.
- Attendance at neighborhood events/festivals, small group and association meetings.
- One-on-one communication, interviews and outreach to individual stakeholders and task force members connected to key constituencies.

Below are links and samples of the community engagement work.

[1] 2020-2024 City of Milwaukee HUD Consolidated Plan Task Force Roster

First Name	Last Name	Organization/Affiliation	Area(s) of Focus		
Bill	Kopka	Associated Bank	Housing, Economic Development, Community Investment		
Larry	Kilmer	City of Milwaukee - Department of City Development	Housing, Community and Economic Development		
Tom	Mischefske	City of Milwaukee - Department of Neighborhood Services	Housing, Neighborhood Stability		
Jessica	Langill	City of Milwaukee - Equal Rights Commission	Access to Equal Opportunity & Fair Housing		
Andi	Elliot	Community Advocates	Housing Stability, Homelessness, Anti-Poverty, Special Needs Populations		
Rob	Cherry	Employ Milwaukee	Employment and Workforce		
Janel	Hines	Greater Milwaukee Foundation	Community Needs, Philanthropy		
Sarah	Greenberg	Greenberg Strategies	Housing, Community and Economic Development		
Ger	Thao	Hmong Wisconsin Chamber of Commerce	Economic Development, Small Business Assistance		
Tony	Perez	Housing Authority of the City of Milwaukee	Housing		

Trena	Bond	Housing Resources, Inc.	Homeownership, Economic Opportunity	
Brian	Peters	IndependenceFirst	Persons with Disabilities, Special Needs Populations	
Michele	Bria	Journey House	Community and Economic Development, Neighborhoods	
Kevin	Turner	Journey House	Community and Economic Development, Neighborhoods	
Colleen	Foley	Legal Aid Society	Civil Legal Services, Fair Housing	
Kori	Schneider-Peragine	Metro Milwaukee Fair Housing Council	Fair Housing	
Karen	Higgins	Milwaukee Christian Center	Community Development, Youth/Social Services, Neighborhoods	
John	Kaye	Milwaukee Christian Center	Housing, Community Development	
Jim	Mathy	Milwaukee County	Housing Stability, Homelessness, Special Needs Populations	
Michael	Stevenson	Milwaukee Health Department	Health and Housing, Lead-based Hazards	
Tony	Baez	Milwaukee Public Schools	Education	
Tony	Kearney	Northcott Neighborhood House	Housing, Youth/Social Services, Neighborhoods	
Joe'Mar	Hooper	Safe & Sound	Community Safety, Youth Services	
Bridget	Robinson	Safe & Sound	Community Safety, Youth Services	
George	Hinton	Social Development Commission	Wraparound Services, Anti-Poverty	
Jim	Hill	The Common Good, LLC	Housing, Homelessness and Special Needs Populations	
Ricardo	Diaz	United Community Center	Community Development, Housing, Education, Youth/Social Services, Neighborhoods	
Nicole	Angresano	United Way of Greater Milwaukee & Waukesha County	Community Needs, Philanthropy	
Lisa	Heuler Williams	UW-Milwaukee Center for Economic Development	Policy and Research	
Mike	Gifford	Vivent Health	Housing Opportunities for Persons with AIDS	
Saul	Newton	Wisconsin Veterans Chamber of Commerce	Economic Development, Small Business Assistance	
Matt	Waltz	WRTP/Big Step	Workforce Training, Employment, Economic Opportunity	
CDGA Staff		Community Development Grants Administration	Participating Jurisdiction - Recipient and Administrator of HUD Federal Funds	
Consolidated Plan Project Team		Urban Economic Development Association of Wisconsin	Technical Assistance, Planning; Community and Economic Development	

[2] Events/Meeting Tracking

Event / Gathering / Presentation	Date	Location	Address	People Reached	Notes
Juneteenth	6/19/19	MLK Drive	2460 N 6th St, Milwaukee, WI 53212	110	Community event; collected surveys
Year 2020 Community Development Funding Allocation Plan Hearing	7/8/19	City of Milwaukee DPW	3850 N 35th St, Milwaukee, WI 53216	25	Community event; collected surveys
Year 2020 Community Development Funding Allocation Plan Hearing	7/9/19	Milwaukee Public Library	906 W Historic Mitchell St, Milwaukee, WI 53204	30	Community event; collected surveys
Take Root Milwaukee Quarterly Meeting	7/9/19	YWCA Southeast Wisconsin	1915 N. Dr. Martin Luther King Jr. Drive, Mllwaukee, Wl 53212	35	Presentation & networking; promoted survey outreach
UEDA Emerging Topics Session	7/12/19	Bader Philanthropies	3300 N Dr M.L.K. Jr Dr, Milwaukee, WI 53212	48	Focus groups; collected surveys
Workforce Development Roundtable for LGBTQ Youth	7/23/19	Pathfinders	4200 N Holton St #400, Milwaukee, WI 53212	10	Listening session
Bronzeville Business Breakfast	8/8/19	Jewels Caribbean Restaurant	2230 N. Dr Martin Luther King Jr. Drive, Milwaukee, WI 53212	250	Outreach event & networking; collected surveys
Hispanic Professionals of Greater Milwaukee	8/22/19	Pfister Hotel	424 E Wisconsin Ave, Milwaukee, WI 53202	50	Community event & networking; promoted survey outreach
Hmong Town's Milwaukee Street Expo	8/24/19	Hmong Town	4855-4899 N 84th St, Milwaukee, WI 53225	100	Community event; collected surveys
Hmong Young Professionals	8/24/19	Anodyne Walkers Point	224 W Bruce St, Milwaukee, WI 53204	3	Listening session
Southeast Asian Civic Engagement Roundtable	8/29/19	Hmong American Womens Association	3727 W National Ave, Milwaukee, WI 53215	10	Listening session
Silver City International Festival	9/7/19	Silver City Neighborhood	3400 W National Ave, Milwaukee, WI 53215	75	Community event; collected surveys
Milwaukee BID/NID Resource Fair		Direct Supply	7301 W Champions Way, Milwaukee, WI 53223	54	Community event & networking; promoted survey outreach
Safe & Sound Staff focus group	9/11/19	Safe & Sound offices	801 W. Michigan Street, Milwaukee, WI 53233	30	Presentation; train-the-trainer survey outreach
Revitalize Milwaukee Coffee & Connection	9/12/19	Revitalize Milwaukee	840 N Old World 3rd St Suite 600, Milwaukee, WI 53203	8	Listening session

Housing Focus Group #1	9/17/19	The VIBE - Riverworks	518 E Concordia Ave, Milwaukee, WI 53212	16	Focus group
City NSP - Northwest Side Community Development Corporation	9/19/19	NWSCDC	4201 N 27th St, Milwaukee, WI 53216	12	Listening session; survey outreach
Housing Focus Group #2	9/24/19	Greater Milwaukee Foundation	101 W Pleasant St, Milwaukee, WI 53212	16	Focus group
City NSP Meeting - Midtown Neighborhood Alliance	9/24/19	Salvation Army	1645 N 25th St, Milwaukee, WI 53205	16	Listening session; survey outreach
City NSP Meeting - West Care / MLKEDC Reception Event	9/25/19	King Commerce Center	2745 N Dr M.L.K. Jr Dr, Milwaukee, WI 53212	30	Listening session; survey outreach
Commercial Corridors / Small Business Focus Group	10/2/19	YWCA Southeast Wisconsin	1915 N Dr M.L.K. Jr Dr, Milwaukee, WI 53212, USA	15	Focus group
Youth Services Focus Group	10/3/19	Hillside Family Center	1452 N 7th St, Milwaukee, WI 53205	20	Focus group
City NSP Meeting - Southside Organizing Center	10/13/19	Ascension Lutheran / SOC	1300 S Layton Blvd # 2, Milwaukee, WI 53215	60	Listening session; survey outreach
LISC Milwaukee staff interview (housing, economic development)	10/22/19	LISC Milwaukee Offices	234 W Florida St #204, Milwaukee, WI 53204, USA	4	Listening session
Five Points Neighborhood Association Meeting	10/26/19	Grace Fellowship Church	3879 N Port Washington Rd, Milwaukee, WI 53212	40	Listening session; survey outreach
Milwaukee United Housing Workgroup Meeting	10/31/19	Global Water Center	247 W Freshwater Way #400, Milwaukee, WI 53204, USA	15	Listening session; survey outreach
Continuum of Care Provider Advisory Committee	11/14/19	Greater Milwaukee Foundation	101 W Pleasant St, Milwaukee, WI 53212, USA	37	Listening session
Veterans Nonprofit Roundtable - WI Veterans Chamber of Commerce	11/19/19	Pritzlaff Building	313 N Plankinton Ave Suite 205, Milwaukee, WI 53203, USA	5	Listening session
Continuum of Care Provider Advisory Committee	1/9/20	United Way of Greater Milwaukee & Waukesha Co.	225 W. Vine Street, Milwaukee, WI 53203	35	Listening session
			Total People Reached:	1159	

[3] Outreach Materials - View file here

Includes images and links to the project website, outreach postcards and flyers, short survey form, About the Consolidated Plan presentation slides (English, Spanish, Hmong), sample outreach emails and press release.

- [4] Community Survey <u>View Summary of Survey Results</u> (slide deck) and <u>Complete Survey Results</u>
- [5] Focus Groups: Summary of Themes View file here

Additional Data Analysis

Data You Can Use, a local data consultant, provided additional analysis that examined trends for the most severe housing problems, changes in the characteristics and needs of households who are at risk, and non-housing economic development trends such as educational attainment, employment, etc. over the past two Consolidated Planning periods.

View these tables here.