

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #1: For those in RAD properties in a project-based voucher apartment, we are told that after one year of living there, we can receive a regular tenant-based voucher if we request one at recertification and one is available. Where would that money go on the Financial Resources summary (page 21 of the Agency Plan) if someone were to obtain a tenant-based voucher?

HACM Response: If a RAD resident requests and receives a Housing Choice Voucher program, the payment of subsidy to the private landlord would show up in the line item 1(e)-- "Annual Contributions for Section 8 Tenant-Based Assistance."

RAD Comment #2: On Page 22 of 52 under Homeownership, HACM mentions a new partnership with ACTS Housing. Can we schedule a visit with ACTS Housing in a future Resident Advisory Board meeting so we can better understand their program?

HACM Response: Yes, we can work to schedule a meeting to discuss all our homeownership options, and can include a representative from ACTS Housing.

RAB Comment #3: In discussing homeownership, one Resident Advisory Board (RAB) member asked what the participant income qualifications for the Section 8(y) homeownership program are.

HACM Response: The HUD requirements over the Section 8(y) homeownership program for Housing Choice Voucher participants are:

1. Disabled Family: For a disabled family (a family whose head, co-head, spouse, or sole member is a person with a disability), the minimum income is the monthly Federal SSI benefit for an individual living alone multiplied by 12.
2. Other Families: The income requirement is the Federal minimum wage multiplied by 2,000 hours. This is currently equivalent to $\$7.25 \times 2,000 = \$14,500$. Also, except in the case of an elderly or disabled family, the PHA shall not count any welfare assistance in determining minimum income.
3. Additionally, unless the family is an elderly or disabled family, the family must demonstrate that one or more adult members of the family who will own the home is currently employed on a full-time basis (30 or more hours per week) and has been continuously employed for the past year.

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #4: Regarding Section 3 (pages 25-26), you stated that one of the significant changes for the Section 3 rules changed from number of new hires to labor hours? What was HUD's purpose in changing this to labor hours?

This is a statement from HUD's Final Rule on Section 3 dated 9/28/2020:

“The proposed rule included multiple elements designed to increase Section 3’s impact in directing employment opportunities and sustaining employment for the people served by HUD financial assistance programs. The rule proposed tracking and reporting labor hours instead of new hires. While the previous new hire framework was valuable for measuring entry into employment, the new hire framework did not capture the extent to which new hiring opportunities are created relative to the total work performed, nor whether those opportunities are sustained over time. The proposed rule’s focus on labor hours sought to measure total actual employment and the proportion of the total employment performed by low- and very low-income workers. In addition, the change to labor hours emphasized continued employment. For example, the prior exclusive focus on counting new hires regarded five new hires for one-month opportunities as a more valued outcome than one 12-month opportunity, and it did not distinguish between full- and part-time employment. A full-time job sustained over a long period allows a low- or very low-income worker to gain skills and is a strong indicator of progress towards self-sufficiency. The new focus on labor hours would ensure that longer-term, full-time opportunities are appropriately recognized.”

RAB Comment #5: On page 31 (Part B.2. HOPE VI or Choice Neighborhoods), what is HOPE VI?

HACM Response: The HOPE VI program was a HUD grant program to revitalize dilapidated public housing and the HOPE VI program lasted from 1993 to 2011. HACM used HOPE VI funding to revitalize several housing developments, including Hillside Terrace (1993), Parklawn (1998), Lapham Park/Townhomes at Carver Park (2000), Highland Park (2004), Scattered Sites (2005) and additional Scattered Sites (2008).

The Choice Neighborhood Initiative (CNI) program was created in 2010-2011 to replace HOPE VI. While HOPE VI focused on grants specifically to revitalize severely distressed public housing, the CNI program has more of a neighborhood focus. It helps communities transform an entire neighborhood by redeveloping severely distressed public and/or HUD-assisted housing and by mobilizing resources to help other catalyze critical improvements in the neighborhood.

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #6: On page 32, you mention that HACM intends to apply for low income housing tax credits. What is the timing on that and will you include resident leadership in discussions around the tax credit proposals?

HACM Response: Typically, WHEDA has proposals for 9% tax credits due in December of each year, and they announce funding in April of the next year. Our plan is to apply at that time or in 2022.

Yes, assuming HACM moves forward with an application, we would communicate with the development's resident leadership regarding the submission of a low income housing tax credit proposal.

RAB Comment #7: On page 32 under Demolition and Disposition, HACM is exploring the potential sale/disposition of scattered sites. Would residents have the option to purchase their unit? Also, would you be communicating with the Scattered Sites Resident Council regarding any plan? Finally, are you aware that Jay-Z and Will Smith have invested in a program to help people purchase homes.

HACM Response: At this time, we believe that in many cases, residents would have an option to purchase their unit if they have the ability to arrange the financing approval.

Yes, prior to any disposition plan to be submitted to HUD, there must be resident communication with any residents who are affected by the planned disposition. This not only would include the Scattered Sites Resident Council but also the Highland Homes Resident Council, as well as any and all scattered sites households that are impacted. There would also need to be similar communication with the Resident Advisory Board. Any resident comments regarding the disposition must be submitted to HUD along with the Housing Authority's responses to the comments.

Thank you for the information on Jay-Z and Will Smith's investment in a rent-to-own startup company called Landis Technologies. Landis assists renters in transitioning to homeownership, and they assist customers in finding their home they are interested in and then Landis purchases it and rents it to the renters for 2 years while the renters work to improve their credit and get ready for a mortgage. They currently operate in only 11 states, and Wisconsin is not one of them.

RAB comment #8: Are RAD developments still eligible for ROSS grant funding for service coordination?

HACM Response: No, due to Congressional restrictions, ROSS money is only for public housing developments. Once a development has a CHAP, it is no longer eligible to apply for any new ROSS grants.

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #9: Is HACM still planning on building the proposed “Convent Hill South” building?

HACM Response: Convent Hill South remains in the early planning stages and financing has not been identified yet.

RAB Comment #10: Is HACM allowed to build jointly with other organizations such as Marquette University, Harley, Coors, etc? We think that Marquette may have an interest in student housing and these companies would have an interest in housing for workers near their companies.

HACM Response: Yes, any public housing authority can hire a private developer or co-develop jointly a housing development with another development entity or organization. In fact, on the Choice Neighborhood proposal for the Near West Side that we were unsuccessful on, there were three co-developers included in the application: Brinshore, CommonBond, and Gorman and Company.

And we agree with you that workforce housing and co-development are areas of great interest as HACM continues to develop mixed income developments.

As for student housing, certain programs such as low income housing tax credits and project-based vouchers do have rules that make those funding sources difficult to use for student housing mixed with affordable housing, but other funding could maybe be identified.

RAB Comment #11: Regarding Goal 2.2 (Complete the Implementation of the CNI grant) on page 36, what are the overall goals of the Choice Neighborhood program as set forth by HUD?

HACM Response: Per HUD, the three core goals of CNI are:

1. Housing: Replace severely distressed public and assisted housing with high-quality mixed-income housing that is well-managed and responsive to the needs of the surrounding neighborhood.
2. People: Improve outcomes of households living in the target housing related to employment and income, health, and children’s education.
3. Neighborhood: Create the conditions necessary for public and private reinvestment in distressed neighborhoods to offer the kinds of amenities and assets, including safety, good schools, and commercial activity, that are important to families’ choices about their community.

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #12: I have a rent assistance voucher and am working with the Metropolitan Milwaukee Fair Housing Council in the Opportunity MKE program to moving to an opportunity neighborhood. I am concerned that I might lose out on my chance, since my Housing Navigator from MMFHC has told me that persons in the program have lost opportunities due in part to: (1) lack of communication from the rent assistance program; (2) that persons are priced out of rents in the better neighborhoods since the fair market rent is set too low, and (3) that persons have only 120 days to lease up and if communication with rent assistance is delayed, that persons can't lease and have to lose their voucher or vacate a property.

HACM Response: HACM continues to work with MMFHC on the Opportunity MKE program and the rent assistance team meets with MMFHC monthly (it had been every two weeks until recently) to discuss challenges and possible solutions. The list of actions taken on page 40 of the Agency Plan include a number that will have a positive effect on participants choosing to move to an opportunity neighborhood, including additional staffing in rent assistance, follow-up calls to participants that have not yet leased, a data-sharing MOU with MMFHC so they have contact information to assist in recruiting additional families, and the implementation of Small Area Fair Market Rents (SAFMRs) to increase payment standards in selected zip codes determined jointly between MMFHC and HACM.

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

I want to encourage you to stick with the Opportunity MKE program and to let HACM know if you are having any issues. In addition, per your request, we will invite HACM's Director of Rent Assistance and staff from MMFHC to an upcoming RAB meeting to answer additional questions on the program.

RAB Comment #13: One RAB member mentioned that the Agency Plan mentions RAD Project-based voucher team and that that team has done on-site re-certifications, I don't know those persons and I'm not sure that they've ever met me. I was asked to come down to the community room and was told that this is a normal lease and was just asked to sign it. I don't sign anything without fully reading it, but others felt pressured to just sign. Another RAB member mentioned that some persons have cognitive issues and they were just asked to sign their paperwork, even though they didn't know what they were signing and their caregiver/power of attorney was never notified about it.

HACM Response: HACM agrees there should never be a situation where anyone should feel pressured to sign without understanding a document. In the lease-signings in these developments, there are generally two sets of paperwork: one for the project-based voucher and one for the property lease/tax credit. HACM will discuss these comments with the impacted departments to determine procedures to avoid the concerns you are raising. Possible solutions include: sending copies of documents ahead of time so that residents can read them in advance; explaining the document point by point or allowing time so that residents know what they are signing; and somehow identifying if a person needs an additional person to accompany them (power of attorney, financial payee, etc.) .

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #13: What is the limited homeless preference mentioned on Page 40?

HACM Response: The limited homeless preference was recently discussed at a RAB meeting in April or May. Either Public Housing or Rent assistance has the ability from time to time to open its wait list for a limited number of homeless applicants from the Continuum of Care or homeless agencies. In the case of public housing, we recently had opened for up to 200 slots. We do not anticipate opening again this year for that preference for public housing. All of these homeless applicants go through a background check similar to those off our regular waitlist.

RAB Comment #14: It says that Crucible or whatever the name of the organization will be will be a nonprofit and have the ability to apply for grants. Will they take steps to work with resident organizations that may also be nonprofit organizations? And, if so, is it a rule that Resident Organizations should apply for grants if they are able and would it make more sense for the resident organization to apply for a grant as opposed to Crucible?

HACM Response: It is not a normally a rule that a grant has to go to a resident organization. HACM/Crucible will work with many partners on grants, including resident organizations or other nonprofit organizations. If it makes sense to apply for a grant for funding, we normally evaluate the rules of the grant: what type of organization is eligible; which organization will score best on capacity/experience; etc. HACM/Crucible will evaluate on a case-by-case basis if it makes sense to partner on a specific grant with a resident organization or another nonprofit.

RAB Comment #15: Recently, my housing development (Highland Gardens) was told that there was not sufficient funding to replace carpeting in apartments, including as a reasonable accommodation for specific individuals. This carpeting is so old that it is a critical repair. Would there not be other public housing funding to fund this, including the \$9 million in discretionary funding (note—this is the public housing dwelling rental income on the Financial Resources summary on page 21)? We were told that there is only \$50,000 for repairs for this building and that is totally insufficient. And I do not believe that the best solution is to give a voucher to persons who are good tenants to have to move out to resolve this issue rather than taking care of it and keeping them as tenants.

HACM Response: The \$9 million in “discretionary funding” is rent for public housing developments and those funds are restricted to be used for public housing. Unfortunately, Highland Gardens is no longer public housing and so has to rely on its own housing development budget for any needed capital repairs or maintenance. The \$50,000 in repair costs that were noted by the RAB member were not for all repairs at Highland Gardens but were for flooring maintenance/repairs and the amount had already been exceeded for the year. We do evaluate reasonable accommodation requests on a case-by-case basis. Assuming there is a relationship documented by a knowledgeable professional between a person’s disability and the accommodation requested, we do look to see if the accommodation is reasonable:

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

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

We will follow back up on this with the individual requesting the accommodation. For long-term purposes (within the next 1-2 years), we are applying for low income housing tax credits later this year for Highland and such costs could be incorporated into the scope of work, assuming there is sufficient budget to perform it at that time.

RAB Comment #16: I know persons that receive rent assistance and have had to move out of a slumlord home as the house was full of mold? They went to Community Advocates to try to get some rental assistance to help them move as they needed to get out of that apartment. However, Community Advocates stated that they could not help them as they were on the rent assistance program. Can we partner with some other organization to assist with moving costs when this type of issue arises to assist persons to move out from slumlords?

HACM Response: Organizations or their donors set their rules over how their money is to be used, and evidently in this instance, Community Advocates determined that they would limit assistance to those in subsidized housing. However, HACM will try to identify other potential partner organizations or possible funding besides Community Advocates for such costs, and if we do, we will communicate it to our staff and residents. Based on this comment from the RAB, we have added a statement to this effect into the 2022 Agency plan under Goal 2.11 “Apply for various Development and Supportive Services grants whenever /wherever they are available.”

RAB Comment #17: Given the issues with crime and car break-ins, what steps is HACM taking to get better lighting and better cameras (including those that pan) for the housing developments?

HACM Response: HACM has applied for HUD’s Emergency Safety and Security Capital Funding in the past. This grant is awarded through a random drawing for eligible housing authorities that justify the need through documented crime data from the local police department that shows why the funding is necessary for a specific development. In 2018, HACM was awarded \$250,000 that was used to install additional cameras in Hillside Terrace, Parklawn and Westlawn. However, this HUD funding can only be used for public housing developments (not RAD developments) and it is difficult to get an award.

The Resident Organization may want to speak with your housing manager and/or their supervisor as well as the Chief of Public Safety to identify which areas of the building or parking lot could use better lighting and/or cameras. If the issue is lighting, we may need to do a survey to see if lighting exists but is not working for some reason, and then repair it if needed. If more/better lighting or cameras are needed, we will need to examine where the best locations may be and where there may be the ability to build the costs into a budget, including possibly over a couple years or into a RAD/LIHTC renovation if budget allows.

RESIDENT ADVISORY BOARD (RAB) COMMENTS AND HACM RESPONSES

RAB Comment #18: Many persons that are disabled and in wheelchairs have difficulty in some buildings opening certain doors to the room for the trash/garbage or the laundry room as they are too heavy/awkward. Can't we install a door opener or do something to accommodate these residents?

HACM Response: In buildings where this is an issue, HACM can evaluate these doors (laundry and trash/garbage) for accessibility and then if they are an issue, to look for possible solutions, including whether there is sufficient budget to install a door opener , or for another reasonable accommodation such as having another more easily accessible spot for disabled individuals to drop off their garbage. Based on this comment from the RAB, we have incorporated a new activity for 2022 under Goal 2.6 "Maintain Public Housing Occupancy at 96%" to review accessibility of common areas.