5-Year PHA Plan
(for All PHAs)

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A. PHA Information.

| A.1 | PHA Name: | Housing Authority of the City of Milwaukee | PHA Code: | WI002 |
| PHA Plan for Fiscal Year Beginning: | 01/2020 |
| PHA Plan Submission Type: | ☑ Revised 5-Year Plan Submission |

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

| Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program |
| | | | | PH | HCV |

Lead PHA:
**B. 5-Year Plan.** Required for all PHAs completing this form.

<table>
<thead>
<tr>
<th>B.1 Mission.</th>
<th>State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA’s jurisdiction for the next five years.</th>
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<tbody>
<tr>
<td></td>
<td>The mission of the Housing Authority of the City of Milwaukee (HACM) is to foster strong, resilient and inclusive communities by providing a continuum of high-quality housing options that support self-sufficiency, good quality of life, and the opportunity to thrive.</td>
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<thead>
<tr>
<th>B.2 Goals and Objectives.</th>
<th>Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</th>
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<tbody>
<tr>
<td><strong>2.1 Implement Rental Assistance Demonstration (RAD) whenever feasible.</strong></td>
<td>Objectives by year:</td>
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<tr>
<td></td>
<td>2020</td>
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<td>1. Complete rehabilitation of Holton Terrace -120 units</td>
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<td>2. Start rehabilitation of Merrill Park – 120 units</td>
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<td>3. Complete RAD financial closing and start rehabilitation of Becher Court – 120 units</td>
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<td>4. Submit 9% Tax Credit Application for Scattered Sites: Cherry Court and Highland Homes AMP.</td>
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<td>5. Complete Revitalization and Preservation Planning for Hillside AMP.</td>
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<td>2021</td>
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<td></td>
<td>1. Complete rehabilitation of Merrill Park and Becher Court projects</td>
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<td>2. Submit 4% tax credit with State credits for Highland Park</td>
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<td>3. Submit 4% tax credit with State credits for Carver Park – 122 units</td>
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<td>4. Submit 9% Tax Credit Application for the Phase 1 of Hillside RAD conversion</td>
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<td><strong>2.2 Complete the implementation of Westlawn Choice Neighborhood Initiatives (CNI) Grant.</strong></td>
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<td>Objectives by year:</td>
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<td>2020</td>
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<tr>
<td></td>
<td>1. Close and start construction of Phase 4B – 138 units of townhomes (136 RAD project-based voucher replacement units and 2 units LIHTC-only).</td>
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<td>2. Close and start construction of Phase 3 - 60 units supportive housing (60 units in two multifamily with 30 of the units being supportive housing for youth aging out of foster care).</td>
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<td>3. Apply for 4% tax credit for Phase 4C -62 units (breakout to be determined)</td>
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<td>4. People: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.</td>
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</table>
5. **Education**: Continue to work with Milwaukee Public Schools and Carmen to implement educational strategies towards increasing the percentage of children in neighborhood schools.

6. **Neighborhood**: Continue to implement the Critical Community Improvements activities, including the façade improvement fund, the revolving business loan fund, and the place-making activities.

### 2021

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

### 2022

1. Complete Housing Construction for all RAD Replacement units
2. Complete relocation of Westlawn West Residents back to Westlawn Gardens
3. **People**: Continue to implement case management of residents at Westlawn related to employment, education, health, other supportive services, and relocation, and provide quarterly reporting on outcomes.
4. **Education**: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
5. **Neighborhood**: Complete the Critical Community Improvement activities for the Westlawn CNI.

### 2023

- Additional details to be developed as goal progresses

### 2024

- Additional details to be developed as goal progresses
2.3 Implement portfolio repositioning under Section 18 Disposition Rules, Rental Assistance Demonstration Program (RAD) and other HUD repositioning tools whenever feasible.

Objectives by year:

2020

1. Submit Sec 18 disposition plan for Scattered Sites:
   AMP WI0020000063 Cherry Court Scattered Sites
   AMP WI0020000060 Highland Homes Scattered Sites
   AMP WI0020000010 Milwaukee Scattered Sites
   AMP WI0020000016 North/West Scattered Sites
   AMP WI0020000061 Southside Scattered Sites

2. Develop and implement plan for ultimate disposition of Scattered Sites AMPs above, whether through preservation with project-based vouchers, Homeownership, or disposition in partnership with non-profits

3. Evaluate avenues for potential repositioning of other AMPs:
   AMP WI0020000013 Arlington Court
   AMP WI0020000011 College Court
   AMP WI002000001 Hillside Terrace
   AMP WI0020000046 Townhomes at Carver Park
   AMP WI0020000019 Lincoln Court
   AMP WI0020000015 Locust Court
   AMP WI0020000017 Mitchell Court
   AMP WI0020000007 Parklawn
   AMP WI0020000062 Riverview

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

2021

1. Develop Plan for Parklawn AMP repositioning or revitalization

2022

Additional details to be developed as goal progresses

2023

Additional details to be developed as goal progresses

2024

Additional details to be developed as goal progresses
2.4 Utilize excess units on Annual Contribution Contract (ACC) Fair Cloth Limit.

Objectives by year:

2020
1. Issue solicitation for Preferred Development Partner.
2. Determine ACC allocation availability for each year. Could be coupled with PBV for financial feasibility consideration for new projects.

2021
1. Collaborate with counties around Milwaukee for possible partnership on Supportive Housing projects that ACC subsidy might be able to work.
2. Consider and evaluate project acquisitions [existing projects] where ACC subsidy can work.

2022
Additional details to be developed as goal progresses

2023
Additional details to be developed as goal progresses

2024
Additional details to be developed as goal progresses

2.5 Maximize Section 8 voucher utilization rate.

Objectives by year:

2020
1. Issue solicitation for PBV allocation.
2. Create and operationalize organization, system and process for a dedicated PBV administration unit under the Rental Assistance Program.
3. Implement effective reporting and matrix reporting tools to property track leasing performance.
4. Implement changes in the VMS reporting responsibilities to enhance accountability.

2021
1. Effectively utilize Yardi reporting tools and HUD’s forecasting tool.
2. Increase landlord engagement

2022
Additional details to be developed as goal progresses

2023
Additional details to be developed as goal progresses

2024
Additional details to be developed as goal progresses
2.6 Maintain Public Housing occupancy rate at a minimum of 96%.

Objectives by year:
2020
   1. Implement all actions committed in the Corrective Action Plan
   2. Regain Standard Performer Status in PHAS
   3. Optimize Yardi System’s management tool capabilities

2021
   1. Ensure all actions committed in the Corrective Action Plan are continued
   2. Continue actions to ensure Standard Performer Status in PHAS
   3. Optimize Yardi System’s management tool capabilities

2022
   Additional details to be developed as goal progresses

2023
   Additional details to be developed as goal progresses

2024
   Additional details to be developed as goal progresses

2.7 Continue to implement programs for Self Sufficiency.

Objectives by year:
2020
   1. Launch and operationalize Crucible Inc., HACM’s community supportive services instrumentality
   2. Develop Strategic Plan to sustain Crucible Inc., less reliant on Public Housing funding.
   3. Continue to participate in the City’s Continuum of Care.
   4. Apply for grants to diversify revenue to sustain self-sufficiency programs.

2021
   1. Implement strategic plan for Crucible, Inc.
   2. Apply for grants to diversify revenue to sustain self-sufficiency programs.

2022
   Additional details to be developed as goal progresses

2023
   Additional details to be developed as goal progresses

2024
   Additional details to be developed as goal progresses
### 2.8 Optimize HACM’s organization structure, processes, and procedures to attain Resiliency and long-term Sustainability.

Objectives by year:

**2020**
1. Continue to implement HACM’s Resiliency Plan
2. Stabilize and Optimize Yardi System
3. Establish effective Tax Credit Management team under Travaux umbrella
4. Refresh PILOT agreement with the City in conformance with the State Law Amendment
5. Continue to engage state legislature to amend HA statutes

**2021**
1. Continue to implement HACM’s Resiliency Plan
2. Continue to stabilize and optimize Yardi System
3. Continue effective Tax Credit Management team under Travaux umbrella
4. Refresh PILOT agreement with the City in conformance with the State Law Amendment
5. Continue to engage state legislature to amend HA statutes

**2022**
Additional details to be developed as goal progresses

**2023**
Additional details to be developed as goal progresses

**2024**
Additional details to be developed as goal progresses

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

Objectives by year:

**2020**
1. Close financing of Convent Hill South Project
2. Parklawn Cyber School and YMCA building disposition
3. Apply as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood, using College Court, other HACM AMPs, or any other assisted housing developments in the area as target housing developments.
4. Apply for CNI Planning grant for Hillside
   - Provide support to facilitate a “Purpose Built”-like community at Westlawn or on any feasible location where a HACM project is or will be located.

**2021**
1. Pre-development Planning for Arlington, Riverview and Locust Court AMP preservation and revitalization
2. Apply for CNI Implementation grant for Hillside

**2022**
Additional details to be developed as goal progresses

**2023**
Additional details to be developed as goal progresses
### 2024
Additional details to be developed as goal progresses

### 2.10 Implement Choice Mobility Initiatives.

**Objectives by year:**

**2020**
1. In partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program, develop and implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program.
2. Continue to provide choice mobility vouchers, if available, to any RAD residents that request one (after one year of living in RAD after conversion).

**2021**
1. Continue to implement a demonstration program promoting and supporting choice mobility to neighborhoods of opportunity in the Housing Choice Voucher program (in partnership with Milwaukee Metropolitan Fair Housing Council, Milwaukee County Housing program, and Waukesha County housing program).
2. Continue to provide choice mobility vouchers, if available, to any RAD residents that request one (after one year of living in RAD after conversion).

**2022**
Additional details to be developed as goal progresses

**2023**
Additional details to be developed as goal progresses

**2024**
Additional details to be developed as goal progresses

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

**Objectives by year:**

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

**2021**
1. Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
2. If unsuccessful in 2020, apply as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood, using College Court, other HACM AMPs or any other assisted housing developments in the area as target housing developments.
3. Submit for a CNI Planning grant for Hillside Development.
4. Apply for Housing Trust Fund grants as needed.
5. Review other possible grants to apply for, including supportive service grants.

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### 2.12 Develop/Implement Comprehensive Housing Plan

Objectives by year:

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<thead>
<tr>
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<th>Details</th>
</tr>
</thead>
</table>
| 2020 | 1. Submit regulatory waivers whenever possible.  
      2. Submit application for Moving to Work or its successor program. |
| 2021 | 1. Continue to look for opportunities to obtain Moving-to-Work type plan. |
| 2022 | Additional details to be developed as goal progresses |
| 2023 | Additional details to be developed as goal progresses |
| 2024 | Additional details to be developed as goal progresses |

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

Objectives by year:

<table>
<thead>
<tr>
<th>Year</th>
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<tbody>
<tr>
<td>2020</td>
<td>1. Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.</td>
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2.14 Ensuring HACM’s sustainability by effectively responding to crises, such as the COVID-19 pandemic, that require changes in business practices to protect residents and employees.

<table>
<thead>
<tr>
<th>Year</th>
<th>Objectives</th>
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| 2020 | 1. Redesign business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.  
2. Procure PPE (personal protective equipment) to assist with objective #1.  
3. Continue to implement YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process. |
| 2021 | 1. Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.  
2. Continue to procure PPE (personal protective equipment) to assist with objective #1.  
3. Complete implementation of YARDI RentCafe with the goal to allow more interactions (recerts, applications, etc) remotely through the web and continue path to a more paperless process. |
| 2022 | Additional details to be developed as goal progresses |
| 2023 | Additional details to be developed as goal progresses |
| 2024 | Additional details to be developed as goal progresses |
B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Status of Previous Goals and Objectives.

1. Strategically reposition the Housing Authority’s assets to maximize available resources to sustain HACM operations, which include administration, management, homeownership, development and community/supportive services, and provide affordable housing and services for HACM’s residents. Activities include submission of demolition/disposition applications, development proposals, requests for project-based assistance, leveraging resources (properties, Capital Fund, Reserves, and Project-Based Vouchers) for financing, applications for grants, including Fund for Lake Michigan and the Affordable Housing Program, housing choice vouchers and amendment of the designated housing plan as needed.

Progress/Accomplishments
2015-2019: Done and implemented. Some specific activities from this goal were incorporated in the 2020-2024 Five Year Plan when intended to be continued.

2. Submit funding applications for low income housing tax credits, the affordable housing program and other sources to support housing needs in the community, such as housing for veterans, and HACM’s property renovation/development.

Progress/Accomplishments
2015-2019: HACM obtained LIHTC (9% and 4% combination) allocations for seven projects totaling $7,938,706. These allocations are used to finance 4 phases in the CNI project and 3 RAD rehab conversion projects. HACM also received 2 AHP grants totaling $1,439,885.

In addition, WHEDA conditionally award Housing Trust Fund for $ 2,289,382 to finance Phase 3 of Westlawn CNI pending award of 9% LIHTC in April.

3. Submit HOME/CDBG, capital fund education and training community facilities program grant or other applications in response to a Notice of Funding Availability (NOFA). Redevelopment sites(s) to be determined on the basis of need, opportunity, and the amount of assistance available.

Progress/Accomplishments
2015-2019: In 2015, HACM completed the renovation of the Milwaukee TechForce Training Center at the Adult Learning Center, using a Community Facilities Capital Fund grant amounting to $1.3 million. Employ Milwaukee obtained a TechHire grant in 2016-17 to implement training of low-income individuals in information technology.

In addition, In connection with the Westlawn CNI grant, the City of Milwaukee committed $1,500,000 of CDBG funds for Westlawn construction.
4. Continue to implement asset based property management.

**Progress/Accomplishments**
2015-2019: HACM completed full implementation of Asset Based Property Management.


**Progress/Accomplishments**
2015-2019: Completed. Contracts were updated with special focus on clarifying expectations. Contract with Friends of Housing (FOH) was also restructured so that FOH will no longer manage public housing developments.

6. Assess the feasibility of converting public housing units to project-based voucher units under the Rent Assistance Demonstration program and submit application if feasible.

**Progress/Accomplishments**
2015-2019: HACM completed the assessment and will implement phase approach to RAD conversion whenever LIHTC credits are available and the project is financially feasible.

7. Implement cost effective energy improvements, including replacement of eligible vehicles and/or recommendations in the energy audit.

**Progress/Accomplishments**
2015-2019: Done. A significant number of hybrid vehicles were purchased in 2016 to replace old vehicles. In addition, HACM has continued to utilize green and sustainable development at Westlawn Gardens. During this period, the Westlawn Gardens Resident Services building was rated as LEED-NC Silver; the Victory Manor building was rated LEED NC-Gold; creation of over 1.5 million gallons of underwater storm water detention; and continuation of stormwater features such as bioswales and bio-boxes partially funded by MMSD and the Fund for Lake Michigan.

8. Develop and test system for measuring the impact of energy improvements on utility consumption and cost.

**Progress/Accomplishments**
2015-2019: This was not done during the period. HACM had difficulty in trying to develop a system to assess the impact of the improvement because units were reconfigured, utility bills are paid by the residents, the need to take into consideration weather patterns, and a number of other issues.

We are currently working to determine the best electronic solution to calculate and summarize the savings from these improvements. WEGOWISE is one product we are researching.
9. Develop a plan to reposition Scattered Sites AMPs that have negative cash flow.

**Progress/Accomplishments**
2015-2019: Assessment of each scattered site unit’s physical needs were done in 2018. The information gathered will be used in the portfolio repositioning of Scattered Sites in 2020-2024.

10. Continue to work with Neighborhood Stabilization Program (NSP) utilizing NSP sales proceeds to acquire/rehab foreclosed properties for rent/sale.

**Progress/Accomplishments**
2015-2019: Fourteen (14) properties have been rehabbed and sold to eligible buyers under the NSP2 program. The addresses include: 4137 N. 44th St., 3938 N. 42nd St., 4165 N. 42nd St., 4233 N. 21st St., 4165 N. 40th St., 5033 N. 25th St., 4120 N. 14th St., 5226 N. 65th St., 4208 N. 36th St., 4171 N. 36th St., 8642 W Douglas Ave., 4332 N. 22nd St., 3961 N. 28th St., and 5351 N. 68th.

11. Secure capital through the Capital Fund Financing Program (CFFP)

**Progress/Accomplishments**

12. Apply for Choice Neighborhood grant(s) to support the Housing Authority’s revitalization plans

**Progress/Accomplishments**
2015-2019: HACM received $30mm CNI grant for Westlawn Project. Implementation is currently ongoing.

HACM also applied for CNI implementation grant for both College Court and Holton Terrace project, but did not receive an award.

13. Obtain High Performer status on the Public Housing Assessment System

**Progress/Accomplishments**
2015-2019: HACM did not attain high performer status for the public housing program. HACM will endeavor to achieve this goal in the 2020-2024 planning cycle, with special emphasis on occupancy and REAC inspections.

14. Maintain High Performer status on the Housing Choice Voucher Program

**Progress/Accomplishments:**
2015-2019: HACM has maintained its High Performer Status for the voucher program.
**B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

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

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

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

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

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

HACM also has a Social Worker and Case Managers on staff and also works with a nonprofit service provider in a number of its developments for seniors or persons with disabilities. Each of these individuals offers case management services to those in need, and they occasionally work with victims of domestic violence, dating violence, sexual assault, or stalking. HACM collaborates and makes referrals to a number of public and nonprofit agencies that provide activities, services and programs to assist and support victims of domestic violence (many of them listed in the “You Are Not Alone” brochure), including 24-hour crisis help lines, shelters, counseling services, child abuse services, and medical and legal support. HACM also is a sponsor of the Milwaukee Fatherhood Initiative, which addresses domestic violence in some of its trainings to fathers such as “Nurturing Fathers.”

During 2015, HACM provided updated training for staff and various partners, including: those responsible for determining an applicant’s eligibility for housing; those at the housing developments responsible for overseeing resident continued occupancy; Housing Choice Voucher staff; social workers and case managers; and public safety staff involved in intervention. The training will educate staff on the provisions of VAWA; how to obtain information needed from the applicant/resident who is seeking protection under VAWA; and on resources and services available in the Milwaukee area for victims of such violence. Resident Advisory Board members and other key resident leaders will also receive training on how to help
victims get connected with services when an actual or threatened domestic abuse incident occurs. In 2017, HACM trained property managers and others managers on updated VAWA forms and policies.

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

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

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

a) A change or changes to the 5-year goals or objectives that are substantial but do not rise to the level of a “significant amendment” (such as the modification or elimination of a specific objective or minor program while retaining the overall strategic goal and accomplishing it through other objectives).

b) Additions of a Capital Fund project or non-emergency work items that are not included in the current Annual Statement or 5-year Action Plan in an amount less than $1,000,000;

c) Or changes in the use of replacement reserve funds under the Capital Fund program in an amount less than $1,000,000;

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

a) The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;

b) Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;

c) Changes to the construction and rehabilitation plan for each approved RAD conversion; and

d) Changes to the financing structure for each approved RAD conversion.

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

Significant amendments are defined as including the following:

a) A change that materially revises the agency’s mission, goals, or objectives;
b) Material changes to rent or admissions policies or organization of the waiting list;

c) Additions of a Capital Fund project or non-emergency work items that are not included in the current Annual Statement or 5-year Action Plan in an amount equal to or greater than $1,000,000, excluding projects arising out of federally-declared major disasters; acts of God beyond the control of the Authority, such as earthquakes, fires, and storm damage; civil unrest; or other unforeseen significant event;

d) Changes in the use of replacement reserve funds under the Capital Fund program in an amount equal to or greater than $1,000,000;

e) Material changes in regard to demolition, disposition, designation, or conversion activities;

f) Any other event or activity that the Authority’s Board of Commissioners determines to be a significant amendment to the approved 5-Year Plan or Annual Plan.

### B.6 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?

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(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

See attached

### B.7 Certification by State or Local Officials.

Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
Instructions for Preparation of Form HUD-50075-5Y
5-Year PHA Plan for All PHAs

A. PHA Information 24 CFR §903.23(4)(c)

A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

B.1 Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years. (24 CFR §903.6(a)(1))

B.2 Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years. (24 CFR §903.6(b)(1)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA’s 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR §903.6(b)(2))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR §903.6(a)(3))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide comments?
(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.17(a), 24 CFR §903.19)