TAB

2025
Agency Plan
HUD-50075-ST

Status: Submitted

Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	**U.S. Department of Housing and Urban Development** **Office of Public and Indian Housing**	**OMB No. 2577-0226 Expires 03/31/2024**

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, including changes to these policies, 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. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** - A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Housing Authority of the City of Milwaukee **PHA Code:** WI002
PHA Type: ☐ Standard PHA ☑ Troubled PHA

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2025
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 2322 **Number of Housing Choice Vouchers (HCVs)** 7691
Total Combined Units/Vouchers 10013
PHA Plan Submission Type: ☑ Annual Submission ☐ Revised Annual Submission

Availability of Information. 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. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

How the public can access this PHA Plan: The Housing Authority of the City of Milwaukee has posted a copy of its Draft 2025-2029 PHA Five-Year Plan and its Draft 2025 PHA Annual Plan, in addition to its current 2020 to 2024 PHA Five-Year Plan and 2024 PHA Annual Plan, on its website, http://www.hacm.org/ for public review. In addition, a copy is located at HACM's main office at 809 N. Broadway, 3rd Floor, Milwaukee, WI 53202.

☐ **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

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y	N	
☑	☐	Statement of Housing Needs and Strategy for Addressing Housing Needs
☑	☐	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☑	☐	Financial Resources.
☐	☑	Rent Determination.
☐	☑	Operation and Management.
☑	☐	Grievance Procedures.
☑	☐	Homeownership Programs.
☑	☐	Community Service and Self-Sufficiency Programs.
☑	☐	Safety and Crime Prevention.
☐	☑	Pet Policy.
☐	☑	Asset Management.
☐	☑	Substantial Deviation.
☐	☑	Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

Statement of Housing Needs and Strategy for Addressing Housing Needs
Waitlist information was updated to July 2024 info. See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
Updated for information regarding any revisions to the ACOP and Administrative Plan and have attached a Deconcentration Policy. See "Deconcentration Policy.pdf" for the policy. Additional attachment summarizing the changes - see "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Financial Resources.
This info has been updated based on most current information. See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Rent Determination.
See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Operation and Management.
See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Grievance Procedures.
Updated to state that the new procedures for Public Housing were passed by the Board of Commissioners in 2023. See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Homeownership Programs.
Updated for 2024 outcomes. See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Community Service and Self-Sufficiency Programs.
Removed the reference to the Jobs Plus program at Hillside Terrace since it ended at the end of January 2024 and the Educational Initiative, a program created during HOPE VI grants at Highland Homes and Scattered Sites. Minor edits to Services for Seniors and Persons with Disabilities, Neighborhood Networks, and Youthbuild sections. See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Safety and Crime Prevention.
Included information on the history and funding of public safety; information on the new Chief; corrected the number of staff to the current number; added information on new strategies that have been implemented; and included a minor change for planning for VAWA training in 2024 or 2025. See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Pet Policy.
See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Asset Management.
See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Substantial Deviation.
See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.
Significant Amendment/Modification
See "WI002 HACM Milwaukee 50075-ST B1 Revision of Existing PHA Plan Elements240904 0927.pdf" for more information.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
HACM's Deconcentration Policy will be attached to the B.1. Section, as it is longer than the text box capacity.;

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y	N	
☑	☐	Hope VI or Choice Neighborhoods.
☑	☐	Mixed Finance Modernization or Development.
☑	☐	Demolition and/or Disposition.
☑	☐	Designated Housing for Elderly and/or Disabled Families.
☐	☑	Conversion of Public Housing to Tenant-Based Assistance.
☑	☐	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
☐	☑	Occupancy by Over-Income Families.
☐	☑	Occupancy by Police Officers.
☐	☑	Non-Smoking Policies.
☑	☐	Project-Based Vouchers.
☑	☐	Units with Approved Vacancies for Modernization.
☑	☐	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan

Hope VI or Choice Neighborhoods.
See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf."
Mixed Finance Modernization or Development.
See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf."
Demolition and/or Disposition.
See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf."

	Designated Housing for Elderly and/or Disabled Families. See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf." **Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.** See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf." **Non-Smoking Policies.** See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf." **Project-Based Vouchers.** See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf." **Units with Approved Vacancies for Modernization.** See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf." **Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).** See the attached document "WI002 HACM Milwaukee 50075-ST B2 New Activities 240904 0927.pdf."
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. **See the attached document "WI002 HACM Milwaukee 50075-ST B3 Progress Report 240904 0927.pdf."**
B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. **The current version of the Capital Fund 5 Year Action Plan for 2023 to 2027 was approved by HUD on 10/10/2023.**
B.5	**Most Recent Fiscal Year Audit.** (a) Were there any findings in the most recent FY Audit? Y ☑ N ☐ (b) If yes, please describe: **See the attached document "WI002 HACM Milwaukee 50075-ST B5 Most Recent Fiscal Year Audit 240904 0927.pdf."**
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y ☑ N ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. **See the attached document "2025 RAB Comments on Annual Agency Plan from RAB final 09-04-24 0927.pdf"**
C.2	**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.
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y ☑ N ☐ If yes, include Challenged Elements. **See the attachment "WI002 HACM Milwaukee 50075-ST C4 Challenged Elements Public Hearing Comments and HACM Responses final 241004 1709.pdf." (Same as Attachment E.)**
C.5	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y ☑ N ☐ N/A ☐ (b) If yes, please describe: **See the attached document "WI002 HACM Milwaukee 50075-ST C5 Troubled PHA 240726 1626.pdf."**
D.	**Affirmatively Furthering Fair Housing (AFFH).**
D.1	**Affirmatively Furthering Fair Housing (AFFH).** **Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.**

Form identification: WI002-Housing Authority of the City of Milwaukee Form HUD-50075-ST (Form ID - 1502) printed by Willie Hines, Jr in HUD Secure Systems/Public Housing Portal at 10/16/2024 04:04PM EST

TAB

B.1. Revision of Existing PHA Plan Elements

B.1. Revision of Existing PHA Plan Elements.

Statement of Housing Needs and Strategy for Addressing Housing Needs

HACM will continue to focus on finding ways to meet the affordable housing needs of City of Milwaukee residents, including families, elderly, disabled individuals, and minorities with disproportionate housing needs. In the area of shortage of affordable housing,

HACM will work to maximize the number of affordable units available by reducing turnover time for vacant housing units and minimize the number of units offline due to routine maintenance or renovation work and will seek to replace units lost to the inventory through mixed finance development and Section 8 replacement housing resources.

HACM will work to improve and maintain Section 8 lease up rates by establishing payment standards that are beneficial to families in the City, by effectively screening applicants to increase owner acceptance of the program and by marketing the Section 8 program to owners, particularly those outside areas of minority and poverty concentration.

HACM will participate in the Consolidated Plan development process to ensure coordination with broader community strategies. HACM will also attempt to increase the number of affordable units by considering applying for Section 8 vouchers as they become available, by leveraging resources in the community through the creation of mixed finance housing and through other non-public housing or Section 8-based assistance.

HACM will continue to work with the Continuum of Care in addressing the housing needs of Milwaukee's homeless residents. In an effort to meet the growing needs of families with disabilities, HACM will carry out modifications based on a Section 504 Needs Assessment and will continue its work with a variety of partner organizations to expand homeownership opportunities, including for families with disabilities. HACM will also conduct activities that affirmatively further fair housing by marketing to racial and ethnic minorities with disproportionate housing needs, counseling Section 8 tenants as to location of units outside of areas of poverty or minority concentration and marketing the Section 8 program to owners outside of areas of poverty and minority concentration.

Below are the statuses of waiting lists as of July 2024. Please note that HACM has combined the two general occupancy wait lists (one that was previously for "family" developments and one that was previously for "highrise/midrise" developments) into one "Public Housing General Occupancy" waitlist. With the lapse of HACM's previous designated housing plan, these are both considered public housing general occupancy and the 2 waiting lists are treated as one consolidated general occupancy wait lists when wait list pulls are conducted.

Housing Needs of Families on the Waiting List

Waiting list type: (select one)
☐ Section 8 tenant-based assistance
☒ Public Housing (general occupancy)
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)
If used, identify which development/sub jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	25,653		500-600
Extremely low income <=30% AMI	20,531	80.0%	
Very low income (>30% but <=50% AMI)	4,130	16.1%	
Low income (>50% but <80% AMI)	866	3.4%	
Families with children	12,042	46.9%	
Elderly families (62+)	1,307	5.1%	
Families with Disabilities	6,059	23.6%	
Race - White	5,076	19.8%	
Race – Black	21,227	82.7%	
Race – Asian/Other	1,468	5.7%	
Ethnicity – Hispanic	2,982	11.6%	

Characteristics by Bedroom Size (Public Housing Only)			
1BR	13,034	50.8%	
2 BR	6,639	25.9%	
3 BR	4,420	17.2%	
4 BR	1,253	4.9%	
5 BR	255	1.0%	
5+ BR	52	0.2%	

Is the waiting list closed (select one)? ☐ No ☒ Yes
If yes: How long has it been closed (# of months): Closed on 8/1/2024
Does the PHA expect to reopen the list in the PHA Plan year? ☒ No ☐ Yes
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes (See ACOP)

Housing Needs of Families on the Waiting List

Waiting list type: (select one)
☒ **Section 8 tenant-based assistance (Housing Choice Vouchers)**
☐ Public Housing
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)
If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	22,205		600
Extremely low income <=30% AMI	17,591	79.2%	
Very low income (>30% but <=50% AMI)	3,794	17.1%	
Low income (>50% but <80% AMI)	732	3.3%	
Families with children	10,325	43.5%	
Elderly families	1,306	5.9%	
Families with Disabilities	5,268	23.7%	
Race-White	4,483	20.2%	
Race-Black	18,259	82.2%	
Race-Asian/Other	1,279	5.8%	
Ethnicity – Hispanic	2,280	10.3%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	Not applicable		
2 BR	Not applicable		
3 BR	Not applicable		
4 BR	Not applicable		
5 BR	Not applicable		
5+ BR	Not applicable		

Is the waiting list closed (select one)? ☐ No ☒ Yes
If yes: How long has it been closed (# of months)? Closed on 8/1/2024
Does the PHA expect to reopen the list in the PHA Plan year? ☒ No ☐ Yes
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes (See Administrative Plan)

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Cherry Court)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	4,927		
Extremely low income <=30% AMI	4,430	89.9%	
Very low income (>30% but <=50% AMI)	384	7.8%	
Low income (>50% but <80% AMI)	91	1.8%	
Families with children	214	4.3%	
Elderly families	567	11.5%	
Families with Disabilities	2,908	59.0%	
Race-White	995	20.2%	
Race - Black	3,995	81.1%	
Race—Asian/Other	272	5.5%	
Ethnicity – Hispanic	395	8.0%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	4,927	100.0%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) -Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List

Waiting list type: (select one)
☐ Section 8 tenant-based assistance
☐ Public Housing
☒ **Project-Based Section 8 Site-Based (Highland Gardens)**
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)
If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	7,824		
Extremely low income <=30% AMI	6,951	88.8%	
Very low income (>30% but <=50% AMI)	699	8.9%	
Low income (>50% but <80% AMI)	141	1.8%	
Families with children	1,333	17.0%	
Elderly families	947	12.1%	
Families with Disabilities	4,433	56.7%	
Race -White	1,597	20.4%	
Race -Black	6,311	80.7%	
Race -Asian/Other	444	5.7%	
Ethnicity – Hispanic	651	8.3%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	6,299	80.5%	
2 BR	1,525	19.5%	
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		

Is the waiting list closed (select one)? ☒ No ☐ Yes
If yes:
How long has it been closed (# of months) Opened in September 2020
Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Convent Hill)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	7,298		
Extremely low income <=30% AMI	6,400	87.7%	
Very low income (>30% but <=50% AMI)	705	9.7%	
Low income (>50% but <80% AMI)	164	2.2%	
Families with children	222	3.0%	
Elderly families	1.368	18.7%	
Families with Disabilities	4,595	63.0%	
Race -White	1,876	25.7%	
Race - Black	5.491	75.2%	
Race -Asian/Other	424	5.8%	
Ethnicity- Hispanic	646	8.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	7,298	100.0%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Lapham Park)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	5,470		
Extremely low income <=30% AMI	4,837	88.4%	
Very low income (>30% but <=50% AMI)	483	8.8%	
Low income (>50% but <80% AMI)	121	2.2%	
Families with children	858	15.7%	
Elderly families	712	13.0%	
Families with Disabilities	3,079	56.3%	
Race -White	1,130	20.7%	
Race--Black	4,408	80.6%	
Race -Asian/Other	308	5.6%	
Ethnicity- Hispanic	470	8.6%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	4,479	81.9%	
2 BR	992	18.1%	
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Olga Village)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	7,250		
Extremely low income <=30% AMI	6,409	88.4%	
Very low income (>30% but <=50% AMI)	638	8.8%	
Low income (>50% but <80% AMI)	171	2.4%	
Families with children	936	12.9%	
Elderly families	1,081	14.9%	
Families with Disabilities	4,435	61.2%	
Race -White	1,860	25.7%	
Race--Black	5,462	75.3%	
Race -Asian/Other	434	6.0%	
Ethnicity- Hispanic	857	11.8%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	6,124	84.5%	
2 BR	1,126	15.5%	
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Holton Terrace)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	4.716		
Extremely low income <=30% AMI	4,251	90.1%	
Very low income (>30% but <=50% AMI)	366	7.8%	
Low income (>50% but <80% AMI)	82	1.7%	
Families with children	171	3.6%	
Elderly families	548	11.6%	
Families with Disabilities	2,888	61.2%	
Race -White	1,067	22.6%	
Race--Black	3,716	78.8%	
Race -Asian/Other	270	5.7%	
Ethnicity- Hispanic	389	8.3%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	4,716	100%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Merrill Park)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	3,991		
Extremely low income <=30% AMI	3,577	89.6%	
Very low income (>30% but <=50% AMI)	322	8.1%	
Low income (>50% but <80% AMI)	77	1.9%	
Families with children	164	4.1%	
Elderly families	505	12.7%	
Families with Disabilities	2,300	57.6%	
Race -White	833	20.9%	
Race--Black	3,217	80.6%	
Race -Asian/Other	224	5.6%	
Ethnicity- Hispanic	318	8.0%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	3,991	100%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Becher Court)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	7,167		
Extremely low income <=30% AMI	6,351	88.6%	
Very low income (>30% but <=50% AMI)	631	8.8%	
Low income (>50% but <80% AMI)	153	2.1%	
Families with children	1,334	18.62%	
Elderly families	869	12.1%	
Families with Disabilities	4,184	58.4%	
Race -White	1,964	27.4%	
Race--Black	5,267	73.5%	
Race -Asian/Other	450	6.3%	
Ethnicity- Hispanic	914	12.8%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	5.529	77.2%	
2 BR	1,638	22.9%	
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Scattered Sites)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	18,655		
Extremely low income <=30% AMI	14,747	79.1%	
Very low income (>30% but <=50% AMI)	3,376	18.1%	
Low income (>50% but <80% AMI)	477	2.6%	
Families with children	16,781	90.0%	
Elderly families	222	1.2%	
Families with Disabilities	2,733	14.7%	
Race -White	3,188	17.1%	
Race--Black	16,002	85.8%	
Race -Asian/Other	991	5.3%	
Ethnicity- Hispanic	1,955	10.5%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A		
2 BR	11,008	59.0%	
3 BR	5,850	31.4%	
4 BR	1,528	8.2%	
5 BR	269	1.4%	
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Victory Manor)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	6,932		
Extremely low income <=30% AMI	5,761	83.1%	
Very low income (>30% but <=50% AMI)	913	13.2%	
Low income (>50% but <80% AMI)	221	3.2%	
Families with children	591	8.5%	
Elderly families	664	9.6%	
Families with Disabilities	2,542	36.7%	
Race -White	998	14.4%	
Race--Black	6,072	87.6%	
Race -Asian/Other	420	6.1%	
Ethnicity- Hispanic	480	6.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	6,932	100%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Westlawn Gardens Midrise)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	6,935		
Extremely low income <=30% AMI	6,116	88.2%	
Very low income (>30% but <=50% AMI)	652	9.4%	
Low income (>50% but <80% AMI)	134	1.9%	
Families with children	427	6.2%	
Elderly families	1,243	17.9%	
Families with Disabilities	4,125	59.5%	
Race -White	1,163	16.8%	
Race--Black	5,886	84.9%	
Race -Asian/Other	371	5.4%	
Ethnicity- Hispanic	427	6/2%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	6,935	100%	
2 BR	N/A		
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Westlawn Gardens)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	29,762		
Extremely low income <=30% AMI	23,760	79.8%	
Very low income (>30% but <=50% AMI)	4,938	16.6%	
Low income (>50% but <80% AMI)	925	3.1%	
Families with children	15,833	53.3%	
Elderly families	796	2.7%	
Families with Disabilities	5,448	18.3%	
Race -White	4,467	15.0%	
Race--Black	26,134	87.8%	
Race -Asian/Other	1,591	5.4%	
Ethnicity- Hispanic	2,617	8.8%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	13,624	45.8%	
2 BR	9,166	30.8%	
3 BR	5,219	17.5%	
4 BR	1,467	4.9%	
5 BR	286	1.0%	
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☐ Public Housing ☒ **Project-Based Section 8 Site-Based (Townhomes at Carver Park)** ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	10,600		
Extremely low income <=30% AMI	8,627	81.4%	
Very low income (>30% but <=50% AMI)	1,668	15.7%	
Low income (>50% but <80% AMI)	260	2.5%	
Families with children	8,378	79.0%	
Elderly families	183	1.7%	
Families with Disabilities	1,784	16.8%	
Race -White	1,403	13.2%	
Race--Black	9,452	89.2%	
Race -Asian/Other	499	4.7%	
Ethnicity- Hispanic	947	8.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A		
2 BR	N/A		
3 BR	6,485	61.2%	
4 BR	2,416	22.8%	
5 BR	1,699	16.0%	
5+ BR	N/A		
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months) Opened in September 2020 Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes			

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

Detailed language regarding deconcentration and policies that govern eligibility, selection and admissions for both the low rent and Section 8 programs can be found in the Admissions and Continued Occupancy Policy (ACOP) for public housing and the Section 8 Administrative Plan. Both documents are available upon request at all administrative offices and housing development locations and on our website at www.hacm.org

For many years, HACM used the templates and guidance from The Schiff Group, a technical assistance consultant that works with public housing authorities (PHAs) for developing changes to its ACOP and Section 8 Administrative Plan.

In 2022, HACM decided to transition to using templates and guidance from another respected national consulting and technical assistance firm, Nan McKay, for its ACOP and Administrative Plan.
This has meant that HACM's plans have a brand new format for both the ACOP and Administrative Plan. These templates have more detail regarding the regulatory basis of the policies, and therefore are longer than the previous one.

A full reading of both plans is recommended for a complete understanding of HACM's policies and procedures.

Please see the attached summary of changes to the ACOP and Admin Plan proposed for 2025.

Financial Resources:

Financial Resources: Planned Sources and Uses		
Sources	**Planned Amount**	**Planned Uses (for Non-Federal funds)**
1. Federal Grants		
a. Public Housing Operating Subsidy (estimated)	$7,597,586	
b. Public Housing Capital Fund (estimated)	$8,388,987	
c. HOPE VI Revitalization		
d. HOPE VI Demolition		
e. Annual Contributions for Section 8 Tenant-Based Assistance (estimated)	$43,015,323	
f. Public Housing Drug Elimination Program (including any technical assistance funds)		
g. Resident Opportunity and Self-Sufficiency grants		
h. Community Development Block Grant		
i. Recovery Act Capital Funds		
Other Federal Grants (list below):		
2015 Choice Neighborhood Implementation	$236,416	
2. Prior Year Federal Grants (unobligated funds only –list below)		
Capital Fund Program (CFP) 2019	136,504	
Capital Fund Program (CFP) 2020	$46,024	
Capital Fund Program (CFP) 2021	$24,638	
Capital Fund Program (CFP) 2022	$821,631	
Capital Fund Program (CFP) 2023	$5,133,349	
Capital Fund Program (CFP) 2024	$5,452,841	
3. Public Housing Dwelling Rental Income	$9,594,745	
4. Other Income (list below):		
Section 32 Sales	-0-	Homeownership
Investment income	$2,500	Operations
Miscellaneous income	$464,758	Operations
5. Non-Federal Sources (list below)		
HACM-owned Housing	$8,395,182	Operations
Investment income	$19,600	Operations
Miscellaneous	$3,784,498	Operations
Total Resources	**$93,114,582**	

Rent Determination

No changes. Detailed language regarding rent determination for both the low rent and Section 8 programs can be found in the Admissions and Continued Occupancy Policy (ACOP) and the Section 8 Administrative Plan. Both documents are available upon request at all administrative offices and housing development locations.

Operation and Management

The following is a list of many of HACM's public housing management and maintenance policy documents, manuals and handbooks that contain HACM's rules, standards, and policies that govern maintenance and management of public housing, and the polices governing Section 8 management:

- HACM Admissions and Continued Occupancy Policy (ACOP)
- HACM Section 8 Administrative Plan
- HACM Employee Handbook
- HACM Procurement Policy
- HACM Deconcentration Policy
- HACM Snow Plan
- HACM Eviction Resource Guide
- HACM Emergency Preparedness Handbook
- HACM Pest Control Extermination Notice to Residents
- HACM Resident Handbook
- HACM Assistance Animal Policy

Grievance Procedures

HACM's Grievance Procedures are provided to assure that any Housing Authority public housing resident has the opportunity for a hearing if that resident disputes within a reasonable time any HACM action or failure to act which involves that resident's lease with the HACM or any HACM regulations which adversely affect that individual resident's rights, duties, welfare, or status. The policy document is available upon request at all administrative offices and public housing development locations and is also available on the HACM website.

In 2023, two changes to the Grievance Procedures for the Public Housing program were adopted by the HACM Board of Commissioners:

(1) To allow more time for a resident to request a grievance hearing, from 5 days after an adverse action by HACM to 10 days after an adverse action; and
(2) To add procedures allowing for virtual Grievance Hearings if both parties agree to it.

The Housing Choice Voucher program (Section 8 rent assistance) gives participant families an opportunity for an informal hearing to consider whether rent assistance program decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations, and RAP policies. The informal hearing is detailed in Chapter 16 Part III (Informal Reviews and Hearings) of the Section 8 Administrative Plan.

Homeownership Programs

Section 32 Homeownership: HACM has approval from HUD to administer a Section 32 Homeownership program. Under a Section 32 program, a public housing authority (PHA) may sell all or a portion of a public housing development to eligible public housing residents or eligible non-public housing individuals. Eligible persons would be those who are low income, with an income under 80% of Area Median Income. Eligible participants must be a first-time home buyer, must have earned income of at least $15,000/year, must attend homeownership counseling classes and must not owe child support or any state or local authority. Additional information regarding the homeownership program is available at all administrative offices and housing development offices.

In August 2008, HUD approved an amendment to the Section 32 plan to include sale of an additional 40 units from its scattered sites inventory (including AMPs WI002000010P, WI002000016P, WI002000060P, WI002000061P, and WI002000063P). As of 7/5/2023, 30 of those units had been sold, leaving authorization to potentially sell 10 more units under its current plan with HUD.

However, at this time, HACM has decided to put the Section 32 homeownership program on hold due to the fact that the scattered site inventory is currently fully leased and due to the community's need for more affordable rental properties in the Milwaukee metropolitan area.

Section 8(y) Homeownership Program: HACM also administers a Section 8(y) Homeownership Program. The Section 8(y) program assists HACM Housing Choice Voucher program participants in converting their housing voucher towards a mortgage payment instead of a rent payment. For non-disabled households, one or more adult members must be employed 30 hours or more per week and the minimum gross income requirement is $15,000 per year. The employment requirement does not apply to a disabled or elderly family, but the family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home. At the current minimum wage of $7.25/hour, the minimum gross income for disabled and senior households is $14,500. Other eligibility requirements are described in Chapter 15, Part VII of the Administrative Plan. Since December 11, 2001, 279 vouchers have been converted from rental to ownership.

Westlawn Choice Neighborhoods Implementation (CNI): As part of the Choice Neighborhood Implementation grant, HACM has included 50 Homeownership units to be sold to eligible participants as part of the overall housing master plan.

Community Service and Self-Sufficiency Programs

HACM has more than 30 years' experience in building innovative and award-winning partnerships with economic development and supportive service agencies. HACM's approach to community and supportive services programming has produced positive results for residents.

HACM partners with a number of community organizations to provide services for residents that assist and support them and their families. Services that are available for public housing residents include:

Day Care: HACM has three licensed day care/Head Start providers on-site in our housing developments (Tomorrow's Future Early Childhood Center at Hillside, Day Care Services for Children at Parklawn, and Silver Spring Neighborhood Center at Westlawn Gardens).

Youth Services: Youth-serving agencies are on-site in two developments (a Boys & Girls Club at Hillside and the Silver Spring Neighborhood Center at Westlawn Gardens). These agencies provide a comprehensive array of recreational, educational and leadership programs for youth, both after-school and during the summer.

Education: HACM has two schools on-site in HACM housing developments. The Central City Cyberschool is a public charter school (chartered by the City of Milwaukee) that serves up to 400 students in grades K4 to 8th grade and is located at the Parklawn development. During the 2019-20 school year, the Cyberschool also started a high school program in Parklawn and so now serves children from K4 to 12th grade. In addition, the Browning Elementary School is a Milwaukee Public School (MPS) that serves children in grades K4 through the 5th grade and is attached to the Silver Spring Neighborhood Center (SSNC) in Westlawn Gardens.

Adult Education: HACM partners with community organizations to provide GED preparation and adult basic education training on-site in two developments. Milwaukee Area Technical College (MATC) provides GED and adult basic skills training at Hillside Terrace and Literacy Services of Wisconsin provides such services at Westlawn Gardens through the Silver Spring Neighborhood Center. HACM also partners with the Adult Learning Center for adult basic education.

Scholarships: Public housing residents are eligible to apply for scholarships for higher education of up to $2000 per year from HACM.

Healthcare: HACM currently has two health clinics located in its housing developments. Located on the 2nd floor of the Hillside Family Resource Center, the Progressive Community Health Center's Hillside clinic is a federally qualified health center that provides a variety of primary care health care services to low-income families and individuals in Milwaukee. The University of Wisconsin-Milwaukee School of Nursing operates a clinic in the Silver Spring Neighborhood Center at Westlawn that provides health information and wellness services. Services at both clinics are available to residents free or on a sliding fee scale.

Services for Seniors and Persons with Disabilities: Since 1993, HACM has partnered with a nonprofit organization to serve residents in our highrise developments who may be elderly or who may have a disability and need assistance with service coordination. Formerly, HACM's partner was SET Ministry from 1993 to 2017, then UNISON from 2017-2018. In 2024, HACM's current partner is Lutheran Social Services of Wisconsin and Upper Michigan (LSS) which provides service coordination services for residents in highrise developments. Every year, more than 1,300 residents in Milwaukee's highrise housing are assisted by social workers that assist residents by assessing their needs, assessing eligibility for programs and services that are needed by the resident, and linking the resident into those services.

Senior Meal Program: For seniors 60 and older, the Milwaukee County Department on Aging has 27 meal sites that serve a hot lunch Monday through Friday at 11:30 a.m. Four meal sites are currently located in HACM highrise developments in their community rooms (Arlington Court, College Court, Convent Hill and Lapham Park).

Neighborhood Network Centers: HACM currently has six Neighborhood Network Centers (community computer centers) located at:

Townhomes at Carver Park 650 W. Reservoir Ave.
Hillside Terrace 1452 N. 7th Street
Highland Gardens 1818 W. Juneau Ave.
Cherry Court 1525 N. 24th Street
Convent Hill 455 E. Ogden Ave.
Westlawn Gardens (in Silver Spring Neighborhood Center) 5460 N. 64th Street

Each Neighborhood Network Center offers computers and internet access for the community so that households can access information to assist with job search, school, social services and other information needed by residents. HACM has developed a calendar of open lab dates and times for 2024 and 2025 for these computer labs.

Family Self Sufficiency (FSS) program: HACM has a Family Self-Sufficiency Program (FSS) that serves both public housing households as well as participant households in the voucher program (including the Housing Choice Voucher, Project-based Voucher, and other vouchers), serving a goal of 100 households. The FSS Case Manager works with these participants to review the program goals and requirements, sign the participation contract, and develop and implement their individualized plan. Increases in earned income that impact rent may result in the rent increase deposited into an FSS escrow account for the resident. The FSS Case Managers work with any residents who request assistance or are referred by their managers. They will first conduct an individualized assessment to help a resident identify their interests, skills, goals, barriers, and needs. The resident and the Case Manager will then plot out a strategy to help the resident find a job or obtain a better job. The Case Manager will also refer the resident to other services available in the community that are needed to help them with job search, such as G.E.D. preparation courses, driver's education, resume assistance, interview skills, job training, and other skills to help employability

In 2022, HUD approved changes to the regulatory guidance for the FSS program. In 2022, HACM evaluated and made changes to its FSS Action Plan and policies to ensure compliance with the new HUD regulations over FSS.

Choice Neighborhood Case Managers: For most of the Choice Neighborhood Initiative grant program at Westlawn Gardens from 2016 to September 2023, HACM had a number of case managers funded through the CNI grant. These case managers assisted CNI households before, during and after relocation in all supportive service needs of the household, related to education, employment and healthcare. While the grant funding ended in September 2023, HACM will continue to sustain some case management at Westlawn Gardens for residents that need employment assistance or connection to other resources and social services.

TANF Agencies: When necessary, HACM case managers work closely with the TANF agencies in Milwaukee (W-2 agencies in Wisconsin) that serve residents eligible for such services: ROSS Innovative Employment Solutions, America Works of Wisconsin, UMOS and Maximus.

Employ Milwaukee: HACM is a close partner with Employ Milwaukee, the local workforce investment agency, and has a Memorandum of Agreement with the agency. Residents are referred to and utilize the One-Stop Job Centers operated by Employ Milwaukee and also take advantage of job training opportunities if the residents are eligible for WIOA training (Workforce Innovation and Opportunity Act).

Section 3: In compliance with regulations, HACM makes every effort to hire internally and to require contractors to hire public housing residents and other Section 3 persons to the greatest extent feasible. In addition, HACM ensures that prime contractors awarded Section 3 covered contracts subcontract with Section 3 business entities to the greatest extent feasible. In January 2014, HACM created a Section 3 Coordinator position to assist in ensuring compliance with the Section 3 regulations. In August 2014, HACM entered into a Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) regarding Section 3. HUD and HACM entered into this VCA for the purpose of improving HACM's policies, procedures and compliance with Section 3. As part of the VCA, HACM developed a revised Section 3 Plan. In late 2018, HACM completed its VCA agreement with HUD.

HACM helps to link public housing residents and other Section 3 persons with training and employment opportunities whenever possible and does significant outreach to residents to notify them about the availability of such opportunities, through monthly resident meetings, quarterly resident employment newsletters, and through their case managers. HACM leverages training through community resources, such as the Employ Milwaukee (WIOA training), Wisconsin Regional Training Partnership, Milwaukee Area Technical College, and the Milwaukee Community Service Corps. The training provided by these agencies helps residents compete successfully for employment in the building trades.

In September 2020, HUD issued a final rule to revise the regulations that govern Section 3. During 2022, HACM revised its Section 3 Plan and policies to be in compliance with the new Section 3 regulations and is continuing to educate contractors and residents on the new regulations.

Job Training: After the assessment by the Resident Employment Case Manager, HACM may refer residents to job training through a number of community agencies, including but not limited to: Employ Milwaukee (WIA training), Wisconsin Regional Training Partnership (WRTP)/Big Step, Milwaukee Area Technical College (MATC), 4Cs (Child care training), and other training programs.

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

Youthbuild: For a number of years, HACM has partnered with Employ Milwaukee (formerly the Milwaukee Area Workforce Investment Board) in their Milwaukee Builds program.

Under that program, HACM trained a crew of YouthBuild participants in the construction trades with a focus on young adults living in public housing or in the rent assistance program. Through YouthBuild, members can receive hands-on construction training and work on preparing for their GED. The average number of participants trained by HACM per year is 10-12 participants.

In addition, HACM has had a long-term partnership with the Milwaukee Community Services Corps (MCSC), which provides training and job opportunities for young adults ages 18-24 who are interested in construction work but lack job experience. MCSC was established in 1991 as an Urban Corps Expansion Site and has HUD Step-Up designation. HACM has worked closely with MCSC since 1992 to provide training and job opportunities for at-risk young adults.

In 2024, HACM ended its participation in the Employ Milwaukee YouthBuild training program due to the lack of vacant scattered sites housing inventory in need of significant repairs for participants to use for on-the-job construction training worksite. We will continue to refer individuals interested in the construction trades to the remaining Employ Milwaukee training sites (e.g., Milwaukee Christian Center) and WRTP/Big Step. HACM may also incorporate additional training for HACM residents in maintenance repairs as part of the @ Promise program.

Financial Literacy program/Individual Development Accounts (IDAs): Since 1989, Wisconsin Women's Business Initiative Corporation (WWBIC) has been offering quality business education, technical assistance, and access to capital to women, minorities, and low-income individuals pursuing entrepreneurship and business development as a means of self-sufficiency and economic independence.

WWBIC trains, counsels, advises and mentors start-up entrepreneurs, small businesses and micro-businesses throughout Wisconsin. WWBIC offers a number of classes on how to start a business, and WWBIC has also been a leader in microcredit in Wisconsin, helping to provide access to capital to women, people of color and low-income individuals.

WWBIC also offers other programs, such as their personal money management program, Make Your Money Talk, a training covering such topics as creating a personal budget, developing a savings plan, and dealing with past and future credit. Graduates of the program can open an Individual Development Account (IDA), a special savings account where WWBIC will match the participant's savings $4 for every $1 saved, with a maximum account level of $500 in actual participant savings and total with match of $2000. The IDA's can be used to start a small business, purchase a first home, or further a person's education.

Safety and Crime Prevention:

To reduce crime and maintain safety in public housing developments, the Housing Authority of the City of Milwaukee (HACM) created a Public Safety section in the early 1990s. The mission of HACM's Public Safety is to enhance the quality of life for residents living in public housing, by working cooperatively with residents, staff, the public and other law enforcement agencies to preserve the peace, reduce crime and provide for a safe, drug-free environment in which to live, work and raise families.

In the 1990s until Congress eliminated the funding source, HACM's Public Safety received funding from the HUD Public Housing Drug Elimination Program (PHDEP). This funding was eliminated around 2002 by Congress. After that, many housing authorities eliminated public safety departments, relying on their local police department to respond to crimes and issues in their developments. HACM has continued to fund a public safety department through operating subsidies or the property management budget, and continues to research other potential funding sources.

Annually, the Housing Authority's Public Safety section responds to about 10,000 or more calls for service from residents. While the majority of these calls were responding to alarms (building alarms, fire and smoke alarms, and medical pull-cord alarms in our developments) or for quality of life issues (noise, neighbor disputes, vandalism, etc.), these calls also included a number of complaints about drugs, gun offenses, loitering/prowling, and battery and/or domestic violence.

The Public Safety Department has a staff of 18 full-time employees who provide service 24 hours, 365 days a year.

HACM hired a new Chief of Public Safety, Marlon E. Davis, who joined HACM in September 2023 after serving with the City of Milwaukee Police Department for 26 years. At MPD, he held multiple positions with the department before retiring as a Police Lieutenant with the Criminal Investigation Bureau in May 2019. After his retirement, Marlon has been working in leadership roles in the healthcare and retail safety and security space where he led operations that ensured the safety and the security of those places and their visitors and guests.

Public Safety Dispatchers staff a communication center 24 hours a day. In addition to fielding calls for Public Safety, the Communication Center answers calls for emergency maintenance and other Housing Authority services. Public Safety Department responds to more than 10,000 calls for service annually, including building and fire/smoke alarms.

Public Safety Specialists patrol developments on foot, bicycles, and marked motor vehicles. Specialists also monitor building surveillance equipment and respond to medical and burglar alarms. Public Safety staff works closely with residents to ensure their safety concerns are addressed. Public Safety Officers attend each of the monthly Resident Organization meetings, and officers have daily contact with Housing Authority managers and residents. Residents, managers, and Public Safety Officers discuss any crime and safety concerns within their developments. Crime prevention measures and intervention strategies are discussed and implemented. Residents are encouraged to call Public Safety to report problems or suspicious activities as soon as they are observed.

Public Safety has issued “no trespassing orders” to individuals that bar them from all Housing Authority property. These no-trespass orders are issued to persons that participate in illegal activities or create disturbances in HACM housing developments.

Public Safety works closely with the Milwaukee Police Department regarding drug activity at the housing developments. Staff respond to drug complaints from residents and investigate any complaints. If Public Safety staff can substantiate the complaint, they will obtain “intelligence” for MPD so that a search warrant can be obtained. The intelligence gathered by the investigators include physical descriptions of the drug dealers, aliases used, hours of operation, level of sophistication of the operation, weapons used, descriptions of cars (dealers and customers), types of customers, and types of drugs sold. MPD uses this information to obtain a search warrant, and search warrants are executed jointly between MPD and Public Safety. At the time the warrants are executed, MPD secures the units, makes the arrests and secures all the evidence. Public Safety enters the unit once the unit has been secured, photographs all the evidence seized, and documents all persons who are arrested, and immediately serves them with a no trespass notice, banning them from *all* of HACM’s developments and property. This information is then used to begin “One Strike, You’re Out” eviction proceedings which removes illegal drug users and dealers from public housing occupancy. This initiative received a City of Milwaukee, Innovation in City Government award in 1998, and was selected as a 1998 Merit Award winner by the National Association of Housing and Redevelopment Officials.

The vast majority of Public Safety’s work is responding to service calls from residents. Public Safety tracks all service calls received, aggregating them into key indicators which provide a standard measure of residents’ concerns. These service call indicators provide feedback about concerns that are being address and which are escalating, requiring other interventions. The quality of life problems that are

precursors to drug, gang and serious criminal activity are unabated noise complaints, loitering, disorderly conduct, panhandling, vandalism and trespassing. Public Safety responds aggressively to these complaints so that quality of life issues do not escalate into the more serious problems of domestic violence, prostitution, drug activity, gang activity and robberies.

Public Safety is responsible for patrolling the interior of the high-rise/mid-rise developments, parking lots, common areas and community buildings. High visibility of Public Safety is maintained through uniforms and marked vehicles which provide a visual deterrent to criminal behavior. Public Safety Specialists are used to patrol crime "hot spots." In 1999, Public Safety received the authority to issue city of Milwaukee parking tickets to vehicles parked illegally on HACM property. This added authority permits HACM to enforce parking regulations by keeping nuisance vehicles out of parking lots, and keeping fire lanes open for emergency vehicles.

The Chief of Public Safety is responsible for coordinating HACM's Public Safety efforts with those of other law enforcement agencies. As such, the Chief of Public Safety meets and communicates regularly with the Milwaukee Police Department, shares intelligence information relative to violent crime, drug, or gang activity, and at times, HACM is involved in the coordination of the execution of search warrants by MPD.

In addition, Public Safety staff meets regularly with the Milwaukee Police Department and other area law enforcement agencies to exchange information and work cooperatively to provide a safe, secure, and enjoyable environment for all residents. Public Safety staff attend monthly meetings with Police officials and Probation & Parole staff at each district. The Chief of Public Safety is a member of the Homicide Review Commission which meets monthly and was created by Mayor Barrett to try and find ways to reduce homicides. The Chief of Public Safety is also a member of the Milwaukee County Law Enforcement Executives Association (MCLEEA) which meets monthly. The primary purpose of MCLEEA is to foster cooperation among Law Enforcement Administrators within Milwaukee County.

The Housing Authority's Public Safety staff has an excellent working relationship with other law enforcement agencies, including Milwaukee Police Department (MPD), Milwaukee Sheriff's Department, U.S. Attorney General's Office Department of Justice Eastern District of Wisconsin, the Federal Bureau of Investigation (FBI), Drug Enforcement Agency (DEA), U.S. Marshal Service, and the State of Wisconsin Department of Corrections – Probation and Parole. HACM has an updated signed Memorandum of Agreement (MOA) with the Milwaukee Police Department (MPD).

New strategies:

Here are some newer strategies that have been implemented recently:

Public Safety Database: HACM had still been using an older database that had been programmed in the 1990s to track all calls for service for public safety and the disposition of those calls. In early 2024, HACM procured and implemented a new software (THERMS) that allows easier data entry and reporting, the ability to attach photos and other documents to a record, and has better tools for data analysis.

Deployment: The Public Safety Department answering calls for service, patrols, and parking enforcement. The Department provides a proactive presence within the Housing Authority

developments by deploying Public Safety Specialists and Public Safety Supervisors to all HACM properties utilizing a decentralized approach. Utilizing a decentralized patrol approach model helps to maximize public safety coverage to all HACM properties by dividing the city into North, South, and Central patrol areas of responsibility.

Additionally, the Public Safety Department utilizes "hot spot saturation" patrols where resources are directed to individual developments or locations that have shown through data to have an increase in reported incidents. Hot Spot Deployment is based on the availability of resources, when patrols are unobligated elsewhere. Public Safety Specialists, when not on calls or other obligated tasks, will post at the respective identified Hot Spot and conduct tours at the location for, but not limited to, the following:

i. Parking Violations
ii. Unauthorized persons
iii. Loitering
iv. Criminal Activity

Public Safety Specialists are to remain at the Hot Spot location until dispatched to another location for response. Upon clearing the dispatched location Public Safety Specialists are to return to the Hot Spot location, notifying the Public Safety Dispatcher upon arrival.

Expanded partnerships with third party vendors : To assist with supplementing the current staff of the Public Safety Department, HACM has partnered with multiple third-party security service providers to provide coverage at our most incident-challenged developments. The addition of these contracted partners adds an extra layer of presence and protection for the identified developments, in the absence of resources available from the Public Safety Department.

Increased number of cameras (one-time HUD grant) : HACM applied for and was awarded a $250,000 grant from HUD that was able to fund installation of additional surveillance cameras to the HACM system. Through the use of these funds, HACM IT, in collaboration with the Public Safety Department, has installed over seventy-five Rhombus Solutions surveillance cameras in six public housing developments. Rhombus Solutions systems manufactures a cloud based, low-cost security surveillance camera system. These cameras provide a 360-degree coverage area and have facial and vehicle registration plate recognition. In addition, as older cameras in other developments need replacement and as budgets allow, HACM is slowly installing the Rhombus cameras as they are newer technology with better image quality.

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 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.

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 provided staff with guidance 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 also received 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.

HACM will be providing additional training in late 2024 or 2025 for property management, rent assistance, public safety, and other staff that interact with residents to refresh and update knowledge of VAWA regulations, forms and policies.

Pet Policy

No changes from previous year. Residents of public housing highrise general occupancy developments are permitted to keep pets with written permission from HACM. The privilege may be revoked at any time subject to HACM's grievance procedure if the animal becomes destructive, a nuisance, or a health or safety hazard to the other residents. For other general occupancy public housing developments, dogs and cats are permitted only in the scattered sites that are single-family homes as opposed to rowhouses or duplexes. Details of the HACM pet policy are available at all administrative offices and housing development offices. We will work with property management and maintenance to reiterate to all

residents our rules over pets and assistance animals, and for them to report and investigate suspected unauthorized animals.

Asset Management

HACM will continue to maintain compliance with the Asset Based Management regulations. The continued underfunding in operating subsidy and increasing cost of operations due to inflation and other factors have continued to impact the financial position of our developments. We will continue to evaluate the impact of the Resiliency Plan implemented in 2015 on the delivery of services and the long-term fiscal sustainability of the AMPs.

Automated information systems are in place to provide executive management and property managers with online-real time reports that can be used to effectively manage the AMPs. HACM is also in the process of fully converting from the Multiview financial software system to Yardi financial module. By combining the housing and financial software systems into one software system, it should increase efficiency and ease of the reconciliation process and will allow better management reporting on a timely basis.

HACM will continue to use 25% Capital fund Program (CFP) to supplement operating subsidy and will request waiver to use CFP to pay for public safety operations. CFP will also be used for comprehensive employee training and development, eligible resident services activities, eligible resident self-sufficiency programs, and continued implementation of Section 3 opportunities. HACM expects to use CFP and other private and federal grants for construction of new units, major rehabilitation, energy efficiency, and to address long-term deferred maintenance items on the properties. In conjunction with the planned conversion under the Rental Administration Demonstration (RAD) program, HACM will evaluate the fiscal and physical viability of each AMP under the Public Housing Portfolio for effective repositioning.

Substantial Deviation/Significant Amendment
No Changes from previous year.

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 another 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, homeownership, capital fund financing, development, mixed financing proposal 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.

(c) The PHA must submit its Deconcentration Policy for Field Office review. See attachment "Deconcentration Policy".

TAB

B.1.c Deconcentration Policy

(also found in the ACOP)

HOUSING AUTHORITY OF THE CITY OF MILWAUKEE
DECONCENTRATION POLICY

HACM is committed to achieving a healthy mix of incomes in public housing developments by attracting and retaining higher income families and by working towards the goal of deconcentration of poverty.

The goal of the policy is to bring higher income tenants into lower income projects and lower income tenants into higher income projects. This policy statement covers the method for achieving deconcentration of poverty and income-mixing of public housing developments. [24 CFR 24 CFR 903.1 and 903.2]

Developments that are subject to the deconcentration requirement are referred to as "covered developments" and include general occupancy public housing developments. Per 24 CFR 903.2 (b), the following developments are not subject to deconcentration and income mixing requirements:

- Developments with less than 100 public housing units
- Mixed population developments or developments designated specifically for elderly or disabled families;
- Developments operated by a public housing authority with only one general occupancy development;
- Developments approved for demolition or for conversion to tenant-based public housing
- Developments approved for a mixed-finance plan using HOPE VI or public housing funds
- Additionally, any developments with any RAD PBV units will have all units in that development waived from the deconcentration policy. (HUD Notice PIH 2019-23)

HACM will follow these steps to determine if actions are needed, and if so, to take these steps to provide for deconcentration of poverty and income mixing. [24 CFR 903.2(c)]

1. HACM will determine the average income of all families in all covered developments on an annual basis.

2. HACM will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

3. HACM will then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level of 30 percent of area median income).

4. If, at annual review, the average income at a covered development is outside the EIR, HACM will then determine whether or not this development is consistent with its local goals and annual plan.

5. If HACM has covered developments with an average income outside the EIR, HACM must then determine whether or not these developments are consistent with its local goals and annual plan.

6. If HACM does not provide an explanation in its annual plan regarding a covered development outside the EIR, HACM may take the following actions to provide for deconcentration of poverty and income mixing [24 CFR 903.2(c)(1)(v)]:
    a) Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
    b) Establishing a preference for admission of working families in developments below the EIR
    c) Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration

If HACM has provided that a family that resided in a covered public housing development has a right to admission to a public housing unit in that development after revitalization, the requirements of this policy do not preclude fulfilling that commitment or HACM's commitment to return a family to another development after revitalization. [24 CFR 903.2(c)(3)]

A family has the sole discretion whether to accept an offer of a unit made under HACM's deconcentration policy. HACM must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under HACM's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

TAB

B.2.
New Activities

B.2. New Activities

HOPE VI or Choice Neighborhoods

No new activities.

The HOPE VI grant program does not have current funding from HUD. HACM received six HOPE VI grants between 1992 and 2008 for Hillside Terrace, Parklawn, Lapham Park/Townhomes at Carver Park, Highland Park (Highland Homes/Highland Gardens, Scattered Sites I, and Scattered Sites II. These six grants are fully expended and completed.

There is a 2014-15 CNI grant currently in progress to transform the Westlawn Gardens neighborhood; however, the grant funding should be fully expended and the grant closed out by the end of 2024..

Currently, there are no public housing properties that by themselves are eligible for a new Choice Neighborhood Implementation grant. HACM will continue to advocate with Congress and HUD to update and revise these restrictions on CNI grants.

HACM may also apply for CNI Planning or Implementation grant for Hillside Terrace (WI0020001) when the NOFA eligibility allows it. Hillside has 470 units of public housing that received HOPE VI grant in 1992 (about 30 years ago). These public housing units are in need of capital to address deferred maintenance and functional obsolescence.

HACM will continue to monitor CNI grant guidelines and, if those guidelines are revised for eligibility by HUD, would evaluate the following public housing developments for any possible opportunities as a CNI target development for an implementation or planning grant:

Asset Management Property (AMP)	Property	Office Address	Units
WI002000013	ARLINGTON COURT	1633 N. Arlington Pl.	230
WI002000011	COLLEGE COURT	3334 W. Highland Blvd.	251
WI002000019	LINCOLN COURT	2325 S. Howell Ave.	110
WI002000015	LOCUST COURT	1350 E. Locust St.	230
WI002000017	MITCHELL COURT	2600 W. National Ave.	100
WI002000062	RIVERVIEW	1300 E. Kane Place	180
WI002000007	PARKLAWN	4434 W. Marion St.	380
WI002000001	HILLSIDE TERRACE	1419 N. 8th St.	470
WI002000010	SCATTERED SITES-MILWAUKEE	5003 W. Lisbon Ave	61
WI002000061	SCATTERED SITES-SOUTH	5003 W. Lisbon Ave.	64
WI002000016	SCATTERED SITES-NORTH & WEST	5003 W. Lisbon Ave.	144
WI002000060	SCATTERED SITES-HIGHLAND HOMES	5003 W. Lisbon Ave.	56
WI002000063	SCATTERED SITERS-CHERRY	5003 W. Lisbon Ave.	70

Mixed Finance Modernization and Development

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

Recent award statuses include:

- Westlawn Renaissance V for 44 units, including 20 reserved for youth aging out of foster care (2021 9% Low Income Housing Tax Credit award) closed in July 2022 and was completed by December 2023.

- Westlawn Renaissance VII for 97 units (2021 4% Low Income Housing Tax Credit award) closed in July 2022 and was completed in April 2024.

- Townhomes at Carver Park (122 total units, 102 of them tax credit) (2021 9% Low Income Housing Tax Credit award) closed in July 2022 and was completed by December 2023.

- Highland Gardens (114 units). This project received a 4% Low Income Tax Credit Award in 2023 and expected to close and start construction in the 3rd quarter of 2024.

In late 2024 or 2025, HACM intends to submit to the Wisconsin Housing & Economic Development Authority (WHEDA) applications for Low Income Housing Tax Credits (LIHTC) to continue mixed finance modernization and development, which may include the following:

- Cherry Court (120 units)
- Convent Hill (80 units)
- Convent Hill tower (The Caroline) – workforce housing new construction

HACM will also continue to evaluate and plan for potential future modernization and development of Hillside Terrace WI002000001) as a mixed finance development.

Demolition and/or Disposition

Potential disposition activities (other than already described under the RAD section) that HACM intends to submit for approval by the U.S. Department of Housing & Urban Development (HUD) shall include the following:

Disposition of community buildings at Parklawn to Central City Cyberschool (AMP WI002000007): HACM received disposition approval for this property, however, discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. The discussions are currently on hold and terms have not yet been finalized due to financing challenges.

Disposition of Vacant Lots (AMPs WI002000010—Scattered Sites Milwaukee; WI002000016—Scattered Sites North & West; WI002000060—Highland Homes; WI002000061—Scattered Sites South; and WI002000063—Cherry Court Scattered Sites): HACM owns approximately 75 vacant lots in the City of Milwaukee, and therefore is responsible for maintaining these vacant lots. HACM is exploring the potential sale/disposition of these lots back to the City of Milwaukee or to some other entity or entities.

Disposition of Scattered Sites units (AMPs WI002000010—Scattered Sites Milwaukee; WI002000016—Scattered Sites North & West; WI002000060—Highland Homes; WI002000061—Scattered Sites South; and

WI002000063—Cherry Court Scattered Sites): HACM owns approximately 380 public housing scattered sites homes. HACM is exploring the potential sale/disposition of scattered sites homes under Section 18. As recommendations are made, HACM will follow the Section 18 requirements on resident and local government consultation.

Disposition of Buildable Lots for Market Rate Housing at Westlawn Gardens (AMP WI002000070): As part of the 2010 Westlawn Master Plan and the Choice Neighborhood Transformation Plan, HACM had set aside land at Westlawn for the potential creation of market rate housing. We anticipate disposition on a number of buildable lots for this market rate housing. Details on the number of lots and the potential types of housing are still being developed.

Disposition of Vacant Land at 421 E. Locust Street: (part of AMP WI002000008 and Tax ID 3141302100) : This is land that is adjoining the Holton Terrace housing development. HACM is exploring the potential sale/disposition of this vacant outparcel for market value to be used for retail/commercial use. HACM has obtained HUD approval for a disposition of this land. After the HUD approval, HACM issued a request for proposals, and received one proposal. The proposer (Kinship Community Food Center) provided an overview of their proposal to Holton Terrace residents in July 2024, and will also provide one to the Resident Advisory Board and the HACM Board of Commissioners.

Disposition of HACM's interest in the building at 1916 N. Vel R. Phillips Ave., which is owned by St. Francis of Assisi Church, a ministry of the Province of St. Joseph of the Capuchin Order, Inc.: HACM currently has a long-term lease on a portion of the property at this address. The facility is currently leased by St. Francis of Assisi Church to the Boys & Girls Club for use as their Ready Center that provides afterschool tutoring and career development for teens. The long-term lease to HACM was due to receipt of funding for capital improvements to renovate several of the educational classrooms and a lobby area through a HUD FY2011 Capital Fund Education and Training Community Facilities. HACM will begin to work with HUD to determine the process of how to dispose of this long-term lease interest.

Designated Housing for Elderly and/or Disabled Families

In October 2021, HACM was notified by HUD that HACM's Designated Housing Plan had expired in June 2021 and that HACM did not submit an extension request by the deadline. The Designated Housing Plan designated units in HACM's public housing highrises for elderly families or mixed families (elderly and/or disabled).

Since this Plan had expired in June 2021 without renewal, HACM's highrises are currently designated by HUD as general occupancy units (units that are available for any eligible households) and are not restricted to elderly or mixed (elderly or disabled) households. Thus, the separate wait list that had been in place for designated housing developments is now treated as consolidated with the other public housing general occupancy wait list and any wait list pulls are done accordingly.

HACM plans to evaluate, develop and submit a new Designated Housing Plan for the six remaining public housing highrises (Arlington Court, College Court, Lincoln Court, Locust Court, Merrill Park, Mitchell Court, and Riverview) in late 2024 or 2025. The buildings must remain as "general occupancy" until HUD has approved a new Designated Housing Plan.

Conversion of Public Housing to Tenant-Based Assistance

No new activities.

Conversion of Public Housing to Project-Based Assistance under RAD

HACM will continue to evaluate the feasibility and may submit RAD Applications in the future for the following AMPs:

AMP	Property	Office Address	Units	Type
WI002000013	ARLINGTON COURT	1633 N. Arlington Pl.	230	PBV
WI002000017	MITCHELL COURT	2600 W. National Ave.	100	PBV
WI002000007	PARKLAWN	4434 W. Marion St.	380	PBV
WI002000062	RIVERVIEW	1300 E. Kane Place	180	PBV
WI002000010	SCATTERED SITES - MILWAUKEE	5003 W. Lisbon Ave.	61	PBV
WI002000061	SCATTERED SITES- SOUTH	5003 W. Lisbon Ave.	64	PBV
WI002000011	COLLEGE COURT	3334 W. Highland Blvd.	251	PBV
WI002000001	HILLSIDE TERRACE	1419 N. 8th St.	470	PBV
WI002000019	LINCOLN COURT	2325 S. Howell Ave.	110	PBV
WI002000015	LOCUST COURT	1350 E. Locust St.	230	PBV
WI002000060	SCATTERED SITES – HIGHLAND HOMES	5003 W. Lisbon Ave.	56	PBV
WI002000063	SCATTERED SITES- CHERRY	5003 W. Lisbon Ave.	70	PBV
WI002000016	SCATTERED SITES North & WEST	5003 W. Lisbon Ave.	144	PBV

In addition to RAD conversions, HACM will continue to evaluate future public housing repositioning options to include but may not be limited to Section 18 demolition disposition and RAD/Section 18 Blend.

Occupancy by Over-income Families

No new activities.

Occupancy by Police Officers

No new activities.

Non-Smoking Policies

No new activities. In accordance with HUD's final rule on "Instituting Smoke-Free Public Housing" and HUD Notice PIH 2017-3, HACM instituted a new non-smoking policy in 2018 prior to HUD's deadline of July 31, 2018. The new policy was developed, approved and distributed with an effective date of July 1, 2018. It not only impacted public housing developments, but also applied to HACM's mixed finance developments developed with low-income housing tax credits. HACM will do outreach and education to residents to remind them of the no-smoking policies and will work to ensure staff are aware of the need to enforce policies when violations can be documented.

Project-Based Vouchers

Consistent with HACM's plan to increase affordable housing units, HACM may project-base Housing Choice Vouchers for units owned by the Authority, in joint venture with private developers or solely for other private developers intending to create new affordable housing units. HACM will follow applicable regulations in the issuance of these vouchers.

Marquette University and Near West Side Partners (NWSP) have been working on a transformation plan under a Choice Neighborhood Planning grant during 2019-2021. HACM is working with the City of Milwaukee, Near West Side Partners and Marquette University on possible Choice Neighborhood Implementation (CNI) grant in the future. The Housing Plan, an output of the Planning Grant, includes a goal to, "…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…".

In 2021, HACM issued a Request for Proposals for Project-Based Vouchers from property owners and/or developers who would like to attach federal subsidies for new construction or existing unsubsidized units, which could include housing being rehabbed or adaptive reuse of existing structures for residential housing developments eligible for project-based vouchers, to support the Near West Side Partners (NWSP) Housing Plan. After review of the RFP, HACM awarded 165 Project-based Vouchers to qualified developments in 2022. Some projects starting to gain traction in 2023 and 2024 and have received HAP contracts, and some have requested extension on their voucher allocation.

Units with Approved Vacancies for Modernization

In accordance with 24 CFR §990.145(a)(1), HACM received approval from the local HUD office to place public housing units into the Undergoing Modernization sub-category. HACM anticipates it will make a similar request in 2025.

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

The Housing Authority applied for and received a 2022 Capital Fund Emergency Safety and Security grant in the amount of $250,000 to install security capital needs such as cameras, etc. at Arlington Court, College Court, Lincoln Court, Locust Court, Mitchell Court, and Riverview.

HACM will continue to evaluate other grant opportunities from HUD as they become available. These could potentially include the Capital Fund Emergency Safety and Security grants or other special Capital Fund grants.

TAB

B.3.
Progress Report

B.3 Progress Report

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

2.1 Implement Rental Assistance Demonstration (RAD) whenever feasible.

Objectives by year:

2020

- Complete rehabilitation of Holton Terrace -120 units
- Start rehabilitation of Merrill Park – 120 units
- Complete RAD financial closing and start rehabilitation of Becher Court – 120 units
- Submit 9% Tax Credit Application for Scattered Sites: Cherry Court and Highland Homes AMP.
- Continue Revitalization and Preservation Planning for Hillside AMP.

2021

- Complete rehabilitation of Merrill Park and Becher Court projects by 12/31/21
- Submit 4% tax credit with State credits for Highland Park
- Submit 4% tax credit with State credits for Carver Park – 122 units
- Submit 9% Tax Credit Application for the Phase 1 of Hillside RAD conversion

2022

1. Estimated RAD Closing for Townhomes at Carver Park in July 2022

2023

- Continue predevelopment activities for the Hillside Terrace revitalization

2024

- Continue predevelopment activities and explore financing plan options for Hillside Terrace

2020 Progress Report:

HACM continues to implement portfolio repositioning through the RAD program.

- Westlawn Renaissance III, Phase 2B of the Westlawn Development/CNI plan, was completed in April 2020 and occupied in July 2020 (94 units).
- Holton Terrace (2018 9% Low Income Housing Tax Credit award) estimated completion December 2020 (120 units)
- Merrill Park (120 units) was awarded a 2019 9% Low Income Housing Tax Credit award, had a financial closing in December 2019, and has an estimated completion of December 2021.
- Becher Court (120 units) was a 2019 9% Low income housing tax credit award, had its financial closing in June 2020, with an estimated completion in December 2021.
- Westlawn Renaissance VI (138 units) had its financial closing in April 2020 and an estimated completion in December 2021.
- Westlawn Renaissance IV (60 units) is pending closing in October 2020

The team is evaluating the financing structure for the remaining CHAPs and potential applications for the remaining public housing portfolio.

2021 Progress Report:

HACM continues to implement portfolio repositioning through the RAD program:

- Holton Terrace (120 units): All apartments (regular and ADA-accessible) have been completed in early 2021 and majority of the units are leased as of July 2021. Both elevators have been replaced. Community areas are being rehabbed and boiler system will be replaced, and this work should be done by September 2021.
- Merrill Park (120 units): All ADA-accessible apartments have been completed as of July 2021. Continue to work on the remaining regular apartments through 2021, including relocation of original Merrill Park residents to their new rehabbed unit. Construction is currently scheduled to be completed by end of 2021.
- Becher Terrace (120 units): Continue to work on the remaining regular and ADA-accessible apartments through 2021, including relocation of original Becher Terrace residents to their new rehabbed unit. Construction is currently scheduled to be completed by end of 2021
- HACM submitted a 9% Low income housing tax credit (LIHTC) application for Townhomes at Carver Park (122 units) in late 2020 and received an award from WHEDA in April 2021. We will submit a RAD financing plan by November 2021 with the estimated RAD closing for Carver Park in March 2022.

2022 Progress Report:

HACM continues to implement portfolio repositioning to include the RAD Program.

- Westlawn Renaissance V RAD conversion closed as of 7/6/2022 with 3 RAD Units
- Townhomes at Carver Park RAD conversion closed 7/20/2022 with 51 RAD Units
- Westlawn Renaissance VII RAD Conversion closed 7/27/2022 with 73 RAD Units and 20 Section 18 PBV Units.

2023 Progress Report:

HACM continues to implement portfolio repositioning to include the RAD Program.

- Continuing to evaluate redevelopment options for Hillside Terrace Revitalization

2024 Progress Report:

HACM continues to implement portfolio repositioning through the RAD program as follows:

- HACM completed Westlawn Renaissance V and Westlawn Renaissance VII construction, which completed the construction of replacement units (RAD/PBV units) at Westlawn.

- HACM continues predevelopment activities and options for Hillside Terrace Revitalization via RAD.

- HACM continues to look for other possible RAD opportunities for existing public housing developments.

2.2 Complete the implementation of Westlawn Choice Neighborhood Initiatives (CNI) Grant.

Objectives by year:

2020

- Close and start construction of Phase 4B – 138 units of townhomes (136 RAD project-based voucher replacement units and 2 units LIHTC-only).
- 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).
- Apply for 4% tax credit for Phase 4C -62 units (breakout to be determined)
- 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.
- Education: Continue to work with Milwaukee Public Schools and Carmen to implement educational strategies towards increasing the percentage of children in neighborhood schools.
- 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

- 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.
- Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
- 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

- Complete CNI/RAD financial closing and start construction of Phase 4A – 79 units (breakout to be determined)
- Complete CNI/RAD financial closing and start construction of Phase 4C -62 units (breakout to be determined)
- Complete CNI/RAD financial closing and construct commercial/retail amenities – one project
- Complete CNI/RAD financial closing and start construction of town-house market rate housing
- 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.
- Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
- Neighborhood: Continue to implement the Critical Community Improvements activities, including the façade improvement fund, the revolving business loan fund, and the place-making activities.

2023

- Complete Construction of WRV in December 2023.
- Complete CNI Financial Closeout with HUD September 2023
- 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.
- Education: Continue to work with MPS and Carmen to implement educational strategies towards goal of increasing the percentage of children in neighborhood schools.
- Neighborhood: Complete the Critical Community Improvement activities for the Westlawn CNI.

2024

- Complete Construction of WRVII in March 2024
- Work with neighborhood partners to promote and transition the success of Choice Neighborhood, People and Education initiatives long-term.
- Complete relocation of Westlawn West Residents back to Westlawn Gardens
- Evaluate financing options for future CNI affordable housing development and homeownership opportunities

2020 Progress Report:

The Westlawn CNI Transformation Plan continues to be implemented.

- Phase 2B (Westlawn Renaissance III with 94 units total) had the construction completed in late 2019 and was fully leased by August/September 2020.
- Phase 4B (Westlawn Renaissance VI with 138 units total) had a financial closing in April 2020 and construction began during the summer with the first units estimated to be completed by December 2020.
- Phase 3 (Westlawn Renaissance IV with 60 units total, including 30 supportive housing for youth aging out of foster care) is expected to have a financial close in October 2020 with construction to begin in the spring.
- Other redevelopment continues as funding is identified.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return).
- Education: We continue to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Critical Community Improvements continue, including: At least $225,000 in loans from the Small Business Revolving Loan fund that is administered by WWBIC for businesses expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 76th Street Plaza and other businesses; and planning work continues for Placemaking projects.

2021 Progress Report

- HACM submitted a Housing Plan revision to redistribute the replacement housing in Phase 4A and 4C.
- Began leasing Westlawn Renaissance VI (138 units) in May 2021 and construction and leasing will continue through year end

- Westlawn Renaissance IV (60 units, including 30 supportive housing units for youth aging out of foster care) began construction in Spring 2021 and is estimated to be completed in Spring 2022
- The permitting process has begun for Westlawn Gardens Homeownership units
- HACM received a 9% LIHTC allocation for Westlawn Renaissance V (Phase 4A). Construction will begin in Spring 2022.
- Received a 4% LIHTC allocation for Westlawn Renaissance VII (Phase 4B). Construction will begin in Spring 2022.
- Other redevelopment continues as funding is identified.
- People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return).
- Education: We continue to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
- Neighborhood: Critical Community Improvements continue, including: At least $500,000 in loans from the Small Business Revolving Loan fund that is administered by WWBIC for businesses expanding/locating in the CNI neighborhood; Façade improvement grant funds for House of Corned Beef, 76th Street Plaza and other businesses; and implementation work on the Placemaking projects.

2022 Progress Report

- Completed construction of WRIV Beech and Chestnut @ Westlawn Gardens in April 2022.
- Completed construction of WRVI, 138 townhome units in June 2022.
- Westlawn Renaissance V (Phase 4A) a 44 unit midrise closed as of 7/6/2022. Unit mix includes:

Unit Type	Bedroom Size	Number of Units
PBV – designation for youth aging out of foster care	1	28
Tax Credit Only	1	3
Tax Credit Only	2	10
RAD PBV/Tax Credit	2	3

Construction is set to begin in July 2022 with project competition in December 2023.

- Westlawn Renaissance VII (Phase 4C) closed 7/27/2022. Unit mix includes:

Unit Type	Bedroom Size	Number of Units
RAD PBV/Tax Credit	1	7
RAD PBV/Tax Credit	2	16
RAD PBV/Tax Credit	3	40
RAD PBV/Tax Credit	4	10
Regular PBV (Deminimis reduction from RAD Units)	2	20
Tax Credit Only	1	1
Tax Credit Only	3	3
Total Units		**97**

  - Secured American Recovery Plan funding from the City and State amounting to $15mm to fill in the financing gap for the WR V and WR

VII project, including additional funding for the construction of non-HUD funded rental and home ownership housing as per CNI Housing Plan.
        - Construction is set to begin in July 2022 and be complete by March 2024.
        - People: Case management of residents continues, including relocation back to the target site of Westlawn Gardens as units are completed for those residents that choose to return back (all residents have the right to return) as well as assisting residents that want to work with employment opportunities.
        - Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
        - Neighborhood: Work to improve the neighborhood development continued as follows:
    - HACM/CNI joined with WWBIC and PNC Bank to launch Black Business Boost, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Since its launch in October 2022, over 600 applications have been received.
    - The CNI exterior revitalization grant program awarded a $50,000 grant to the owners of Silver Spring Mall, located directly across Silver Spring Drive. Combat Corner, which was awarded a $25,000 grant during the summer, has begun improvements to its facade. Work is moving forward on the Havenwoods Plaza, which was awarded a $50,000 grant. Additional applications for approximately $85,000 are under review.
    - The CNI loan fund program made several awards to businesses relocating into the CNI neighborhood or expanding in the CNI neighborhood, including:
        - A $100,000 loan to TMP Aeronautics, a new business that established itself in the CNI neighborhood and that is a supplier to the aerospace industry.
        - A $250,000 loan to Bert & Tom, LLC to support relocation of a beer distribution business to an empty manufacturing space and plans for a beer garden/tap room with expansion to include a restaurant and commercial kitchen. We are also considering an exterior revitalization grant to support the project.
        - A $250,000 loan to CRS Enterprises, LLC to purchase one of Milwaukee's oldest African American owned & operated social service organizations to continue those services located in the CNI neighborhood.
    - Designs have been completed for the Carmen Playfield renovation, which will include the Tuj Lub courts that are part of the CNI CCI plan. The renovation is schedule to begin in May 2022.
    - The Best Babies Zone healthy birth outcomes initiative, facilitated by CNI and funded by a grant from the Greater Milwaukee Foundation, started the year with strategic planning and launched activities with a virtual family self-care event.
    - The CNI supported Northwest Fresh Food Access Council continued to meet, strategize and coordinated efforts to increase access to fresh food in the neighborhood. This included coordination to utilize the Browning Elementary greenhouse to grow over 2,000 vegetable seedlings to be transplanted into

community gardens this summer by residents and the Teens Grow Greens youth leadership program.

- One of the main goals of the program is coming to fruition as a Sentry Foods grocery store is in the process of locating in the strip mall across the street from Westlawn Gardens, in the spot formerly filled by the Meat Market. This will finally bring a full-service grocery store to the neighborhood.

2023 Progress Report

- Construction of WR V and WR VII are on track for completion this year.
- Design and construction of 10 units non-HUD funded housing units is expected this year.
- The CNI grant will be completed in September 2023 and HACM is on track to fully expend the grant. Housing construction for final phases continues.
    - People: Case management of residents continues with two case managers currently assisting target residents. This includes assistance in residents wishing to return as the final replacement units are completed in 2023, as well as those wanting assistance on finding employment/job search.
    - Education: HACM continues to work with Milwaukee Public Schools and Carmen regarding strategies to increase the number of neighborhood residents choosing neighborhood schools.
    - Neighborhood: Work to improve the neighborhood development continued as follows:
    - Business Loan Program: Part of the HACM's Critical Community Improvements Plan for CNI, the Business Loan Program is a joint initiative with Wisconsin Women's Business Initiative Corporation (WWBIC). Under Milwaukee's Choice Neighborhoods Business Loan program, $1 million in Choice Neighborhoods CCI funds was set aside for a revolving fund, which was matched with $500,000 from WWBIC. This two-thirds/one-third split enabled the partnership to offer its loans at favorable rates, which further incentivized businesses to set up shop in the neighborhood. To date, the Business Loan Program has helped eight businesses either launch, expand or relocate into the neighborhood, created/retained 58 jobs, and spurred exponential growth and largescale economic development throughout the community.
    - Façade Program: CNI also partnered with Milwaukee's Department of City Development to fund exterior façade revitalization efforts in the CNI neighborhood. A number of façade grants have been awarded under the program to improve the physical appearance of the neighborhood and assist local businesses with needed exterior physical improvements.
    - Black Business Boost: HACM/CNI continues to partner with WWBIC and PNC Bank on their Black Business Boost program, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Black Business Boost is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital: Credit Recovery and Support; Technical Assistance and Training; Acceleration and Incubation; and Equity and Loan Support.

- Other programs: CNI has also partnered in a number of other neighborhood programs, including the Best Baby Zone healthy birth outcomes initiative and the Northwest Fresh Food Access Council.

2024 Progress Report

- Construction of Westlawn Renaissance V (the 44 unit midrise also known as Maple) was completed and ready for occupancy in December 2023.

- Construction of Westlawn Renaissance VII (79 townhomes units) was completed in Spring 2024 and ready for occupancy.

- Since WL Renaissance V and VII completed the Choice Neighborhood replacement units for the grant, relocation of the last Westlawn residents who wanted to come back to Westlawn replacement units has been completed. Two households with higher incomes will each be offered one of the market rate units.

- Started construction of 11 market rate rental units in April 2024, funded with State ARPA funding. This is the first phase of market rate units.

- It is anticipated that HACM will complete the CNI grant in the fall of 2024. All housing and people funds have been expended, and we are on track to complete and fully expend neighborhood (Critical Community Improvements) funding as well.

- After completion, HACM and HUD will do final close-out of the CNI grant but will continue to report to HUD on activities such as completion of market rate housing. HACM is on track to fully expend the grant.

- Business Loan Program: Part of the HACM's Critical Community Improvements Plan for CNI, the Business Loan Program is a joint initiative with Wisconsin Women's Business Initiative Corporation (WWBIC). Under Milwaukee's Choice Neighborhoods Business Loan program, $1 million in Choice Neighborhoods CCI funds was set aside for a revolving fund, which was matched with $500,000 from WWBIC. This two-thirds/one-third split enabled the partnership to offer its loans at favorable rates, which further incentivized businesses to set up shop in the neighborhood. To date, the Business Loan Program has helped eight businesses either launch, expand or relocate into the neighborhood, created/retained 58 jobs, and spurred exponential growth and large scale economic development throughout the community.

- Façade Program: CNI also partnered with Milwaukee's Department of City Development to fund exterior façade revitalization efforts in the CNI neighborhood. A number of façade grants have been awarded under the program to improve the physical appearance of the neighborhood and assist local businesses with needed exterior physical improvements.

- On May 24, 2024, the Havenwoods Taproom & Beer Garden had their grand opening. The project is supported by CNI loans and facade grants to both the business owner and the property owner, and it includes redeveloping formerly empty industrial building site

into a craft beer taproom, beer garden with woods walk, and food trucks. Havenwoods Neighborhood Partnership has scheduled its weekly summer music series at the beer garden beginning July 11, 2024.

- Another CNI facade project, Havenwoods Plaza located directly across the street from Westlawn Gardens, has reached capacity in 2024 on its 5 retail bays, with We Care Pharmacy, Tasty's Deli, and the Asian Market (which is renting 3 retail bays).

- Black Business Boost: HACM/CNI continues to partner with WWBIC and PNC Bank on their Black Business Boost program, a micro-equity and technical assistance program to help 100 Black entrepreneurs over three years. Black Business Boost is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital: Credit Recovery and Support; Technical Assistance and Training; Acceleration and Incubation; and Equity and Loan Support.

- Other programs: CNI has also partnered in a number of other neighborhood programs, including the Best Baby Zone healthy birth outcomes initiative, the Northwest Fresh Food Access Council, and a digital equity initiative.

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

- 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

- Continue to assess and evaluate operational needs for repositioning with ongoing opportunity.

2022

- Reposition AMP WI002000046 Townhomes at Carver Park via RAD Conversion

2023

- Evaluate avenues for potential repositioning of other AMPs:
  - AMP WI002000013 Arlington Court
  - AMP WI002000011 College Court
  - AMP WI002000001 Hillside Terrace
  - AMP WI002000019 Lincoln Court
  - AMP WI002000015 Locust Court
  - AMP WI002000017 Mitchell Court
  - AMP WI002000007 Parklawn
  - AMP WI002000062 Riverview

2024

- Continue to evaluate avenues for potential repositioning of other AMPs via use of the Rental Assistance Demonstration Program (RAD) or the Section 18 Disposition program (through preservation with project-based vouchers, homeownership, or disposition in partnership with nonprofit organizations):
  - AMP WI002000013 Arlington Court
  - AMP WI002000011 College Court
  - AMP WI002000001 Hillside Terrace
  - AMP WI002000019 Lincoln Court
  - AMP WI002000015 Locust Court
  - AMP WI002000017 Mitchell Court
  - AMP WI002000007 Parklawn
  - AMP WI002000062 Riverview
  - AMP WI002000063 Cherry Court Scattered Sites
  - AMP WI002000060 Highland Homes Scattered Sites
  - AMP WI002000010 Milwaukee Scattered Sites
  - AMP WI002000016 North/West Scattered Sites
  - AMP WI002000061 Southside Scattered Sites

2020 Progress Report:

Ongoing. We continue to use RAD as a repositioning tool for Westlawn Gardens, Holton Terrace, Merrill Park and Becher Court. We will continue to evaluate the potential of using Section 18 disposition as a possible portfolio repositioning tool for scattered sites, however we have not yet completed our evaluation. It is anticipated that this will continue into 2021.

2021 Progress Report:
HACM continues to evaluate financial feasibility and resident impact for Section 18 repositioning. All 2020 goals will be evaluated for possible implementation in 2022 and beyond. At the time recommendations are made, HACM will follow Section 18 guidance on resident and local government consultation.

2022 Progress Report:
HACM continues to evaluate financial feasibility, resident impact and opportunity to reposition the public housing portfolio. Due to the COVID19 Pandemic, much of the focus over the last several years has been on stabilizing operations and providing residents with the highest quality of customer service.

2023 Progress Report:
HACM continues to evaluate financial feasibility, resident impact and opportunity to reposition the public housing portfolio. During 2023, HACM was focused on stabilizing operations and providing residents with the highest quality of customer service, and on the completion of Westlawn Gardens CNI.

2024 Progress Report:
HACM continues to evaluate financial feasibility, resident impact and opportunity to reposition the public housing portfolio. During 2024, HACM was focused on stabilizing operations and providing residents with the highest quality of customer service, and on the completion of Westlawn Gardens CNI.

2.4 Utilize excess units on Annual Contribution Contract (ACC) Faircloth Limit. Consistent with HACM's plan to increase affordable housing units, HACM may utilize its excess ACC units – (under the Fair Cloth Limit) of around 1,000 units, in joint venture with private developers or solely for other private developers intending to create new affordable housing units. HACM will follow applicable regulations in the utilization of these excess ACC authority.

Objectives by year:

2020

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

2021

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

2022

- Consider issuing a solicitation for use of excess ACC capacity.

2023

- Consider issuing a solicitation for use of excess ACC capacity.

2024

- Consider issuing a solicitation for use of excess ACC capacity.

2020 Progress Report:

Ongoing. We will not issue a solicitation for use of excess ACC units during 2020. We will consider utilizing excess unit capacity for public housing as a tool for potential development by other developers in the Near West Side neighborhood.

2021 Progress Report:

Ongoing. We may solicit uses for excess ACC units during 2021. We will consider utilizing excess unit capacity for public housing as a tool for potential development by other developers in the Near West Side neighborhood.

2022 Progress Report:

Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

2023 Progress Report:

Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

2024 Progress Report:

Ongoing evaluation. While we have not used it to date, HACM continues to evaluate the potential to develop excess ACC units with partners in the metropolitan area.

2.5 Maximize Section 8 voucher utilization rate.

Objectives by year:

2020

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

2021

- Effectively utilize Yardi reporting tools and HUD's forecasting tool.
- Increase landlord engagement

2022

- Under HUD oversight, work to implement a plan to improve HAP utilization. See detailed plan under 2021 Progress report below.
    - For the Housing Choice Voucher program, current utilization is 68% and our goal is to eventually improve it to 90%.
    - For the Project-based Voucher program, the current utilization is 87% and our goal is to eventually improve it to 98%.
    - HACM's goal is to to increase the number of utilized vouchers for their HCV program to 6,487 by the end of December 2022, which is an increase in the total number of utilized vouchers in 2022 of 930 housed families.

2023

- HACM's goal is to increase the number of utilized vouchers for their HCV program to 6,941 by December 2023.

2024

- HACM will implement required actions in its Corrective Action Plan regarding the HUD Field Office Site Monitoring Report.
- HACM will implement required actions in its Corrective Action Plan regarding the HUD Quality Assurance Division (QAD) Financial Management Review and Management & Operations Review (FMR/MOR).
- HACM will implement required actions in its Corrective Action Plan regarding the HUD QAD report on Family Self Sufficiency.
- HACM will implement all required actions in its Corrective Action Plan regarding the SEMAP rating for the rent assistance program.

2020 Progress Report:

Ongoing. We will consider issuing a solicitation for Project-based vouchers (PBVs) in late 2020 as a tool to assist in replacement units and/or other affordable units for potential development by other developers in the Near West Side neighborhood.

Additionally, we have created a separate PBV administrative team within the Rent Assistance program department at HACM. This team is working to manage the separate PBV wait lists and to efficiently manage the PBV program. They are working to improve the tools in YARDI used to track leasing performance at PBV developments.

The Soldiers Home project is estimated to be completed in 2021, and the units have VASH vouchers allocated to it.

2021 Progress Report:

Below are steps that HACM's Rent Assistance program has established and will continue to work on during 2021 and 2022 to process more efficiently and to increase lease-up percentages:

- Hiring and redeployment of staff, including:
- Hired 5 Certification Specialists. These new hires include replacement of team members who have voluntarily/not voluntarily left the organization. This team has resumed working in office rather than remotely.
- A team of four workers has been assigned to focus on New Admissions and voucher issuance. One of these Team members will be the appointed liaison for the Emergency Housing Voucher deployment.
- A team of seven workers has been assigned to focus on Annual reexaminations, Adjustments and PIC data clean-up.
- A team of 2 Lease and Contract Specialists are conducting follow-up calls to participants with issued vouchers but not leased-up.
- This year the RAD/Project-based Voucher team has grown from a team of 4 to a team of 6 individuals. The added 2 team members are Clerical Assistants. This team has resumed working in the office as opposed to remotely.
- A team of 2 is dedicated to the Waiting list mailings and processing background check responses.
- Implement changes to policy and/or procedures to improve efficiency and effectiveness, including:
- All participants with late Annual Re-examinations are being contacted via phone to be completed. HUD documents that are required to be signed and not included in the waivers are being emailed/mailed to complete and return to the program. Measurable goals have been established for this team.
- All the RAD/Project Based Developments (HACM Owned and Partnering Agencies) have been all centralized with the RAD team.
- The RAD team has scheduled on-site visits to housing developments to complete annual reexams and obtain signed leases.
- Virtual Inspections are currently being conducted and field inspections will resume next month (as needed for those that are being challenged with technology).
- The City Department of Neighborhood Services has been hired to assist with annual inspections that were waived last year and must be completed by 12/31/2021.
- The rent reasonableness unit proximity review has expanded from 1 mile up to 5 miles to located acceptable comparables and minimize the time spent reviewing.
- Landlords interested in participating in the program by listing their available units for program participants, are now listed on the HACM website. This list is updated every Friday.
- Informal Hearings are being conducted virtually.
- Background check reports have been reduced to meet the minimum HUD requirements. This has helped to minimize the review time for each applicant to be approved. In turn, the applicant is processed for eligibility and voucher issuance.

- A Housing Navigator has been hired and is meeting weekly every Wednesday with VASH Case Workers to bridge the communication gap between the VA and RAP and increase VASH Voucher lease-up.
- Currently under review and Yardi testing is the implantation of Small Area FMR's (SAFMRs). We want to ensure Yardi set-up is correct and accurate Payment Standards are being selected according to the established zip codes.
- Hired a PIC coach to assist in the review of our data and reporting. This includes the Yardi conversion data clean-up for accurate VMS/PIC reporting.
- A data sharing MOU was established with the Opportunity Milwaukee Mobility team to recruit eligible families for this program and assist in locating a unit. This will help house families more rapidly and increase lease-up.
- Implemented a limited homeless preference for the Housing Choice Voucher program.
- Use of HUD's forecasting tool and HCV dashboard to monitor and report on progress towards goals.

2022 Progress Report:
Leasing Plan: HACM and CVR Associates (a technical advising firm specializing in rent assistance voucher programs) have been working to create a leasing plan through the use of the Two-Year Tool, data analysis, and the Tool of Tools.

This Leasing Plan is for the years 2022 and 2023, with goals for the estimated number of vouchers issued, PBVs leased, manual PUC overrides, Success Rates, Attrition Rates, and Voucher Issuance to HAP Lease Up projections updated for both years. As these actual numbers and percentages are adjusted, the leasing plan will be amended to ensure maximum utilization.

The number of vouchers issued for 2022 will allow the PHA to get to a point of maximum utilization in early 2023. In doing so, it is anticipated that HACM will be able to maintain their utilization by covering their attrition, while being able to reduce their HAP reserves to under 3%. It will be extremely important for HACM to monitor the key indicators as it relates to the Two-Year Tool and make adjustments to the number of vouchers issued moving forward to continue to maximize their utilization.

Long Term Strategy: If the leasing projections are met, HACM will likely be issuing vouchers to simply maintain the attrition of their program by July of 2023, while having reduced HAP reserves to 3% by the end of 2023. If these benchmarks are achieved moving into 2024, it is recommended additional strategies be implemented:

- Portability – begin administering vouchers to develop new revenue streams.
- Reassign staff – reassign eligibility staff to address long-term operational needs related to Recertifications, Interims, Unit Transfers, etc.
- Operationally – HACM's operations, budget, and funding will be simplified and prepared to address voucher attrition through leasing monthly as opposed to trying to catch up.
- Waiting list – Probably could be closed in 2023 once there are 3,000 remaining names on the HCV waiting list, as it should last for at least two years, presuming a 50% success rate for applications

2023 Progress Report:
In late 2022, HACM's Rent Assistance Program received two detailed on-site monitoring reviews:

- **HUD Field Office Review:** The first monitoring visit in October 2022 was from the Milwaukee HUD Field Office staff to follow up on progress made on actions to improve utilization and other concerns. HACM received a report on this monitoring visit on 12/29/2022.

While the HUD field office noted several improvements that had been made since their last review in 2021, they also found substantial non-compliance issues related to financial/accounting as well as programmatic areas. In total, there were 31 findings and 13 concerns in the report which required a corrective action plan from HACM. Some of the major findings from the HUD Field Office review include, but are not limited to:

- Financial Software: HACM is not using YARDI to its fullest advantage. The use of the Multiview financial software system for accounting complicates the process of accounting for the voucher program and requires additional steps and difficulty in reconciling both HAP payments and administrative fee expenses.

- Internal Controls: Lack of internal controls in the monthly HAP check run as well as in the reconciliation between the HUD Voucher Management System and the HACM accounting General Ledger amounts.

- Late Recertifications: A significant number of recertifications were processed late, including many in which HAP payments were made and charged to HAP in the current year for prior year HAP activity.

- HAP Payments to HACM: HACM was making HAP payments to itself for voucher participants in the Northlawn, Southlawn, and Berryland developments, rather than using LLCs or another entity. This is not in compliance with requirements of PIH Notice 2017-21.

- Inaccurate Data in the VMS and PIC Systems: Data reported to the VMS system and the PIC system have a number of inaccuracies. HACM needs to improve data integrity through using an improved quality control process. VMS reporting was inaccurate in places and needed to be better documented and reconciled.

- Low HAP Utilization Rates: HAP utilization rates continue to be low in both the HCV and PBV programs.

- Processes and Procedures Need Streamlining: HACM must implement a number of changes to streamline and create more efficient and effective policies and procedures to decrease processing delays that are impacting the utilization rates.

- Incomplete Documentation in Files to Verify HAP and Tenant Rent: HACM must improve: (1) compliance with HUD's verification procedures to verify income, assets, etc., including use of the EIV system and other third-party verification; (2) filing and storage of documentation in client files so that they are readily available; (3) ensure appropriate protection of personally identifiable information.

- Use of Independent Entities and other Contractors: Ensure that independent entities were performing rent reasonableness reviews and inspections at HACM-owned properties. In addition, consider outsourcing other processes to contractors to assist when necessary.

On February 10, 2023, HACM submitted a proposed Corrective Action Plan in writing to HUD regarding all findings and concerns, and work is continuing on the plan at this time. Some major action items being worked on include:

- YARDI Financial Software: Effective January 2023, HACM will be using the full YARDI suite for Section 8 [Financials-HAP and HAP related transaction and Program operations]. This will allow better audit trail and more efficient and reliable reconciliation between Yardi and HUD VMS reporting information.

- Business Process Review: HACM has engaged a YARDI consultant to perform a Business Process Review (BPM) to ensure accurate mapping of data, provide accurate reporting to HUD systems (PIC and VMS), provide a road map to optimize use of YARDI by HACM, and improve HACM's processes

- Section 8 Accountant/Analyst: HACM's Accounting Department has hired this position to focus solely on Section 8 accounting and financial reporting. This Financial & Systems Analyst position will have its top priority as stabilizing the Section 8 financial operations.

- Improved Internal Controls/Segregation of Duties: HACM has already improved internal controls, revised responsibilities to provide better segregation of duties, and made revisions to the departmental organizational structure. In addition, HACM developed a Standard Operating Procedure over Quality control that will be implemented in June 2023.

- Increased Outsourcing Where Needed: In cases where HACM does not have the immediate capacity to address issues or where a contractor brings a specialized knowledge or skill, HACM has begun to outsource services and will continue to outsource as needed. For example, HACM has hired Nan McKay to perform HCV recertifications. This will allow HACM staff to focus on correcting data integrity issues with participants in PIC and VMS and receive some intensive training. HACM will continue to look for opportunities to expand outsourcing where needed, with other potential areas that could include items such as but not limited to: tenant file reviews; SEMAP assessment/quality control reviews; FSS program administration assistance; management and organizational reviews and assessments; etc.

- Staff Training: HACM leadership in the finance and Rent Assistance divisions will be required to complete a series of assigned financial management and HCV management and financial management courses All trainings will be tracked through Yardi Aspire and HACM's Human Resources system. Trainings will include trainings

provided by YARDI on specific tasks or processes in YARDI, HCV/PBV-geared trainings from HUD Exchange, and other trainings.

- **Quality Assurance Division Review:** The second review was a site visit from the HUD Quality Assurance Division (QAD) in December 2022 and they performed a Financial Management Review (FMR) and a Management and Operations Review (MOR).

Based on concerns raised by the field office on-site monitoring report, the Quality Assurance Division of HUD scheduled an on-site financial management review (FMR) and management and operations review (MOR) in December 2022. The review covered the five-year period from 2017 to 2022. We received the initial report on findings from QAD on April 11, 2023. Some of the major concerns identified by QAD include:

- The HACM HCV financial records and books of account could not be properly and effectively tracked, and lack an audit trail. The use of Multiview for the accounting software system rather than YARDI adds to the complexity in reconciliation between the housing software and the general ledger, as well as to data reported to HUD through VMS and PIC.

- HACM must ensure a forensic audit and reconstruction of the full financial records to determine the true and accurate financial position.

- In addition, there appeared to be disallowed or questioned costs that need to be investigated and/or corrected. For example, HAP payments appeared to be made for a prior year due to a late recertification and were charged inappropriately to HAP expense rather than administrative fee.

- HACM is not properly tracking Family Self-Sufficiency (FSS) escrow amounts and balances. This appears to be related to errors that occurred as part of the conversion from VisualHomes to YARDI in 2019. It has resulted in inaccurate escrow calculations and balances for participants that need to be corrected. There was also a more detailed Corrective Action Plan regarding the FSS program that was issued in May 2023.

- Based on a review of participant files, the files were deemed in poor condition by QAD. Due to documentation potentially missing from the participant file (hard copy file and/or electronic), QAD could not readily ensure the correct calculation of HAP payment and tenant rent amounts from the file. This could potentially result in incorrect HAP payments made.

HACM responded with a proposed Corrective Action Plan (CAP) to QAD on May 18, 2023. The Corrective Action Plan includes two major actions that were required by QAD:

- HACM will engage a financial consultant/independent contractor before end of June 2023 to perform these activities and to determine the correct financial position of the program. The contractor will assist in a reconstruction and forensic audit of the full

- financial records including full reconciliation between YARDI and the general ledger, determination of the correct UNP and RNP balances, and must ensure any adjustments/changes related to the 100% file review (see next bullet) are appropriately corrected in compliance with HUD regulations.

- As recommended in the Final Corrective Action in MOR-2023-8b, HACM will engage an independent contractor to perform a 100% file review of all new admissions, annual reexaminations and interim reexaminations that occurred during 2022. The contractor will also ensure that YARDI data is accurate and that any corrections are made where appropriate.

2024 Progress Report:

- **2022 Housing Choice Voucher Monitoring Corrective Action Plan (***Reviews conducted by HUD's Milwaukee Field Office and the Quality Assurance Division September 19, 2022 to November 18, 2022)*

  The HUD Milwaukee Field Office identified 109 corrective action items. Of those, HACM has completed 52. Another 54 are duplicative action items that overlap with the HUD Quality Assurance Division corrective action plan. The HUD Quality Assurance Division will continue monitoring the status of these action items.

  Three action items were not completed and will be carried over into the 2023 Section Eight Management Assessment Program Corrective Action Plan.

- As HACM continues to implement the corrective measures, significant strides have been made in strengthening the operational foundation of its Section 8 Housing Choice Voucher program. HACM has:

    - Implemented the full **Yardi financial suite** to combine all programmatic and financial data for the Section 8 program into one integrated software program.

    - Revised and adopted updated **Standard Operating Procedures** (SOPs) for protecting personally identifiable information, processing housing assistance payments, quality control, the Section Eight Management Assessment Program, Voucher Management System reconciliation and reporting, and end of program participation and terminations.

    - Revised and adopted the updated **Accounting and Financial Policies and Procedures Manual**.

    - Launched the **YARDI Aspire training module** to provide job-specific and Housing Choice Voucher program training to staff.

    - Increased use of **Independent Entities** to carry out operational activities such as conducting inspections, processing participant selection, establishing project-based voucher contract rents, and determining rent reasonableness.

- Issued a **Request for Proposal** for the operation and management of HACM's Housing Choice Voucher program and are currently in the process of evaluation of the proposals received.

- **Section Eight Management Assessment Program (SEMAP) Corrective Action Plan** (*Review conducted by HUD-Milwaukee September 2023 to November 2023 for fiscal year end 2022)*

  There were 26 findings, many of which are a continuation of those identified in 2022 by the HUD's Milwaukee Field Office and HUD's Quality Assurance Division. As a result, this corrective action plan contains outstanding corrective actions remaining from the onsite monitoring review HUD's Milwaukee Field Office completed in 2022. HACM will remain in SEMAP troubled status until HACM identifies a suitable vendor to operate its Section 8 program, and that vendor conducts a 100% participant file review for the 2017 - 2022 period, as required by the corrective action plan. HACM anticipates that this will be completed by the end of 2025.

2.6 Maintain Public Housing occupancy rate at a minimum of 96%.

Objectives by year:

2020

- Implement all actions committed in the Corrective Action Plan
- Regain Standard Performer Status in HUD's Public Housing Assessment System (PHAS)
- Optimize Yardi System's management tool capabilities

2021

- Ensure all actions committed in the Corrective Action Plan are continued
- Continue actions to ensure Standard Performer Status in PHAS
- Optimize Yardi System's management tool capabilities

2022

- Ensure all actions committed in the Corrective Action Plan are continued
- Continue actions to ensure Standard Performer Status in PHAS
- Optimize Yardi System's management tool capabilities
- As part of our annual inspections in all buildings (public housing and LIHTC/RAD), review accessibility of common area amenities such as laundry rooms and garbage rooms to ensure that entrances are accessible for persons with disabilities. If not, then look at potential sources of funding to resolve the issue or alternative accommodations that can be made.

2023

- Ensure all actions committed in the Corrective Action Plan are continued and close out of the Recovery Plan
- Optimize Yardi System's management tool capabilities including launching online applications, recertifications and resident portals for rent statements and work order requests.
- Deploy capital investments in public housing to improve REAC scores

2024

- Optimize Yardi System's management tool capabilities including launching executive dashboard
- Deploy capital investments in public housing to improve REAC scores

2020 Progress Report:

Ongoing. We continue to follow all actions in the corrective action plan with the goal of increasing occupancy of public housing units to 96% and of improving our REAC Physical Inspection scores and are providing quarterly reports on progress to HUD. We are also continuing to expand upon our use of YARDI's management tools and reports, with a goal to more closely monitor vacant unit turnaround and leasing and status of work orders. This project will continue into 2021.

2021 Progress Report:

Ongoing. HACM implemented a coordinated approach to turning and filling vacancies during 2020 and 2021 to improve its occupancy rates. In addition, HACM implemented a limited homeless preference for public housing. HACM met its 6/30/2021 goal per the recovery plan of 96% occupancy and in July 2021, HACM is currently at 96.6% with a goal for 12/31/2021 of 98%. HACM will continue to monitor and report quarterly to HUD on three remaining items from the recovery plan through the end of 2021:

- The use of Section 18 disposition as a repositioning tool for some of the scattered sites portfolio
- Unit turnaround time (long term vacancies)
- Opening of the waitlist and/or purging of the waitlist

2022 Progress Report:
Ongoing. HACM continues to implement best practices developed in the Recovery Plan with HUD along with performance improvement measures. To date, the occupancy rate has been sustained at 98%. We continue to work to reduce unit turn time under 30 days and address deferred maintenance needs resulting in low REAC scores.

2023 Progress Report:
In April 2023, HACM received a request from HUD's Milwaukee Field Office for HACM to update its Recovery Plan to address additional conditions contributing to the Substandard PHAS score. As of April 25, 2023, HACM had two open Recovery Plan Goals; achieve and maintain a public housing occupancy rate of 97% and reduce and maintain turnaround time of vacant units to 30 days.

As of May 7, 2023, our occupancy rate is 96.71%, so we are close to the goal of 97%.
Regarding reducing and maintaining the turnaround time of vacant units to 30 days, we are well on our way. At the start of the 2019 Recovery Plan, the unit turnaround time was 257 days. Our current vacant turnaround time is 49 days. While that is a reduction of more than 200 days, we will continue our efforts, until we achieve the 30 days unit turnaround time goal.
For both of these items, new corrective action steps, as well as actions from the previous plan, are included in the HACM 2023 Updated Recovery Plan.
Additional recommendations for improvement provided by HUD which have been incorporated into the Recovery Plan include;

- Provide ongoing training for NSPIRE inspection, Wisconsin state requirements and industry standard repairs.
- Review, update and implement the existing preventative maintenance plan.
- Review inspection deficiencies in a timely matter to file appeals and when creating capital fund plan.

2024 Progress Report:

- HUD has required that we turn our vacant units and house a new tenant within 45 days, maintain an occupancy rate of 97% and implement a year-round preventative maintenance plan. We report out to HUD each month on our progress.

- As of June 2024, HACM's occupancy rate dropped slightly to 96% due to the fact there are 30 units that need substantial work in order for property operations to complete the unit turnaround. Once these units are approved by HUD for hold status, the occupancy rate will exceed 97%.

- HACM efforts to attract or retain residents include:
    - HACM is continuing to offer one month's rent concession with a lease signing commitment of one- year, at Locust, Mitchell, and College Court. HACM is offering

the first month's rent free and the sixth month free with a commitment of a one-year lease.
- HACM will continue to do exit interviews with tenants who have chosen to move.
- Intake has committed to getting property management five applicants per vacancy. (Intake will do a waiting list purge in order to get applicants that are still interested).
- Property Management is working with HR to identify new talent for the turn team.
- HUD allowed HACM to place several of the long-term vacancies into to a HOLD status – that approval allows HACM additional time to make repairs to units that need substantial work in order to get them back online to rent out.
- HACM was granted funds from the City of Milwaukee- these funds will be used to hire five custodians who will rotate between most of the HACM properties to help keep the properties free of debris, clean, and sanitary. To date, HACM has filled three of those positions.
- HACM has hired a third-party contractor to help with the Pest Management work order requests.

- HUD's Real Estate Assessment Center issued the PHAS score (an annual assessment of the Public Housing portfolio) and designation for HACM's fiscal year end 12/31/2022. On June 30, 2023, HUD issued a preliminary score of 77 and designated HACM as a standard performer. This assessment is specific to HACM's public housing operations; however, the financial portion of the assessment was impacted by the ongoing corrective action plans for HACM's Section 8 program. As a result, HACM's auditor was unable to render an opinion on HACM's 2022 financial statements by HUD's 9/30/2023 deadline.

  This resulted in the financial score of the assessment automatically being zeroed out, changing HACM's PHAS score from 77 to 53 and its designation status from standard to troubled. HACM is confident that the agency will return to at least a standard performer status once the auditor is able to issue an opinion.

2.7 Continue to implement programs for Self Sufficiency.

Objectives by year:

2020

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

2021

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

2022

- Identify and procure an online giving tool and customer relationship software tool
- Prepare promotional material for the new nonprofit.
- Design the website for the new nonprofit.
- Create a fundraising plan for the new nonprofit.
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
- Continue to develop and refine outcome goals and determine method of measurement and reporting.

2023

- With input from the Executive Director and Board of Commissioners, determine the best structure over resident services/self sufficiency
- Identify and procure an online giving tool and customer relationship software tool
- Prepare promotional material for the new nonprofit or entity
- Design the website for the new nonprofit or entity
- Create a fundraising plan for the new nonprofit or entity
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
- Continue to develop and refine outcome goals and determine method of measurement and reporting

2024

- With input from the Executive Director and Board of Commissioners, determine the best structure over resident services/self sufficiency
- Identify and procure an online giving tool and customer relationship software tool
- Prepare promotional material for the new nonprofit or entity
- Design the website for the new nonprofit or entity
- Create a fundraising plan for the new nonprofit or entity
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.
- Continue to develop and refine outcome goals and determine method of measurement and reporting

2020 Progress Report:

Ongoing. In 2020, we incorporated and launched Crucible, Inc. (an instrumentality of the Housing Authority) to perform community and supportive service activities. Since 1/1/2020, any new supportive service employees who work on self-sufficiency programs are hired under Crucible as opposed to HACM with a separate benefit package (similar to Travaux). The agency will continue to evaluate the instrumentality name and implementation during 2020-2021.

We continue to apply for grants to assist HACM's various self-sufficiency programs. Prior to the end of 2020, Crucible plans to hire a Development Director to assist with grant and fund development.

2021 Progress Report:
The COVID pandemic set the organization a bit behind in its goals for 2020. In early 2021, Crucible, Inc. hired a Development Director. In addition, discussions began on evaluation of the existing name of the instrumentality (Crucible), with the following goals in mind:

- Work with the board and others to select a new name to replace Crucible, Inc.;
- Through strategic planning, reconfirm the mission, values and case for support of the organization;
- File the 501 (c)(3) application;
- Begin to formulate a fundraising strategy;
- Identify and recruit 3-5 potential new board members for the organization;
- Continue to apply for grants to diversify revenue to sustain self-sufficiency programs.

2022 Progress Report:
During 2022, HACM's Development Director and COO-Program Services continued to strategize to diversify and identify potential sources of revenue such as grants to advance or sustain HACM's self-sufficiency programming, such as Make Your Money Talk, FSS, Education Initiative, etc. HACM has put the further development of the separate branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined. Work continues on identifying outcome measures and goals for supportive services as well as on procuring an online giving tool.

2023 Progress Report:
During 2023, the Chief Operating Officer-Program Services continued to strategize with a goal of identifying and diversifying potential sources of revenue such as grants to advance or sustain HACM's self-sufficiency programming. HACM has put the further development of the separate branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined. Work continues on identifying outcome measures and goals for supportive services as well as on procuring an online giving tool.

2024 Progress Report:

- During 2024, the Chief Operating Officer-Program Services and staff continued to identify opportunities for potential sources of funding (e.g., grants) or collaborations with partners to sustain or advance HACM's self-sufficiency programs.

- HACM has put the further development of the separate branding of a nonprofit instrumentality (Crucible or Beyond Housing MKE) on hold until the strategy over its use has been further refined.

- HACM applied for and received HUD grant funding for the FSS program for calendar 2024.

- In January 2024, the HUD Jobs Plus grant for Hillside Terrace ended and residents were transitioned off of the Jobs Plus Earned Income Disregard that was in effect during the grant and back to a standard rent calculation

- In 2023, the Make Your Money Talk program provided by WWBIC for HACM residents and participants assisted 274 residents who graduated from the financial education program; 115 residents that opened an Individual Development Account (matched savings account); and 125 that used their savings to purchase a home; start a business; for post-secondary education; purchase or repair a vehicle; or for credit repair.

2.8 Optimize HACM's organization structure, processes, and procedures to attain Resiliency and long-term Sustainability.

Objectives by year:

2020

- Continue to implement HACM's Resiliency Plan
- Stabilize and Optimize Yardi System
- Establish effective Tax Credit Management team under Travaux umbrella
- Refresh PILOT agreement with the City in conformance with the State Law Amendment
- Continue to engage state legislature to amend HA statutes

2021

- Continue to implement HACM's Resiliency Plan
- Continue to stabilize and optimize Yardi System
- Continue effective Tax Credit Management team under Travaux umbrella
- Refresh PILOT agreement with the City in conformance with the State Law Amendment
- Continue to engage state legislature to amend HA statutes

2022

- Evaluate options for Section 8 Restructuring to include consideration of developing an instrumentality
- Add additional contracts for property management services under Travaux
- Continue to optimize use of YARDI system.

2023

- Implement Rent Cafe Online Recertifications for Residents
- Develop a rigorous staff onboarding, training and continuous education program.

2024

- Evaluate transitioning public housing and section 8 accounting services into new software.

2020 Progress Report:

Activities are ongoing.

Resiliency Plan: We will continue to implement HACM's Resiliency Plan (for example, the creation of Travaux and Crucible, Inc. as instrumentalities/subsidiaries is one component).

YARDI: In 2019, HACM converted its housing software from VisualHomes to the YARDI system. Our staff on both the public housing, rent assistance and affordable housing (tax credit) sides have continued to implement and refine use of YARDI during 2020.

In May/June 2020, we implemented the YARDI RentCafe module in order to open the Housing Choice Voucher (HCV) waitlist online, and then use a random lottery to select 3,000 applicants. In September 2020, we opened the Project Based Voucher (PBV) wait lists using RentCafe. We plan to open the public housing family waiting list in early 2021 using RentCafe. We also plan to begin implementation of RentCafe for public housing and rent assistance intake forms and for annual recertifications in 2021.

Tax Credit Management: In January 2020 HACM became the property manager to three tax credit properties; Holton Terrace, Merrill Park, and Becher Court. HACM will continue to develop and improve management skills to support future property management contracts.

PILOT: There has been no change to the PILOT (Payment in Lieu of Taxes) payment to the City of Milwaukee during 2020. We continue to look for opportunities to refresh that agreement.

State Statutes: HACM continues to work to educate state legislators around the need to update the statutes surrounding public housing authorities to bring them more in line with HUD policies.

2021 Progress Report:
Activities are ongoing.
YARDI: In 2021, we continued work on implementation of RentCafe for use for intakes and recertifications. We also planned for an opening of the public housing and Housing Choice Voucher wait lists through RentCafe in September 2021. We continue efforts to clean up the system for conversion errors/issues and ensure the system is used to its full capacity.

Tax Credit Management: In October 2021, HACM/Travaux will take on the management of two additional tax credit properties: Scattered Sites Tax Credit I and Scattered Sites Tax Credit II, each of which is 24 units. HACM will continue to develop and improve management skills to support future property management contracts.

PILOT: There has been no change to the PILOT (Payment in Lieu of Taxes) payment to the City of Milwaukee during 2021. We continue to look for opportunities to refresh that agreement.

State Statutes: HACM continues to work to educate state legislators around the need to update the statutes surrounding public housing authorities to bring them more in line with HUD policies.

2022 Progress Report:
Yardi: HACM has opened the public housing and housing choice voucher wait lists through RentCafe. We have also begun to use mobile inspections and mobile work orders. We are working toward launching the RentCafe portal for resident online payments, work order requests, recertifications, housing intake and rent statements.

Tax Credit Management; Effective 1/1/2022 HACM took back all property management contracts for our affordable portfolio. This includes 120 units at Cherry Court, 80 units at Convent Hill, 114 units at Highland Gardens, 201 units at Lapham Park, 122 units at Townhomes at Carver Park, 24 units at Scattered Site Tax Credit 1, 24 units at Scattered Site Tax Credit 2, 8 units at 2nd Street Scattered Sites, 250 units at Westlawn Renaissance, 30 units at WG Scattered Sites, 60 units at Victory Manor and 94 units at Westlawn Renaissance III.

2023 Progress Report
Yardi: Implementation of enterprise-wide Yardi software is ongoing. Section 8 program begun using the Yardi financial suite in January 2023. Public Housing management and Affordable (Tax Credit) property manager are using Yardi online platform RentCafe for waitlist, intake eligibility,

and recertifications. Section 8 continues to evaluate use of Yardi RentCafe for online intake eligibility and recertifications.

2024 Progress Report

Yardi Housing Suite: In July 2019, HACM converted from the previous housing software (VisualHomes) to Yardi for its various housing programs: Public housing ; affordable (low income tax credit housing); and market rate housing .

Since that time, HACM has expanded its use to optimize efficiency and effectiveness. In 2023, Public housing and the affordable tax credit programs implemented the RentCafe portal for use for initial eligibility of applicants when selected (intake) and for recertifications.

In early 2024 , the tenant-based Housing Choice Voucher program began to use RentCafe for online intake eligibility and for recertifications. In the summer of 2024, the project-based voucher (PBV) program did the same.

In fall 2023, HACM also rolled out a RentCafe portal for landlords.

YARDI Financials: HACM operates four (4) Housing Programs: Public Housing, Low Income Housing Tax Credit (LLCs), Market Rate "affordable" rental units, Section 8 Rental Assistance. HACM's Central Office Cost Center provides management and oversight of these programs. In June 2019, HACM Implemented/transitioned to Yardi Software. It was a "phased implementation" with "Housing system" portion implemented first while the general ledger and financial reporting remained under the existing system (Multiview) with the exception of LLCs portfolio.

In January 2023, the Section 8 general ledger system was implemented. Beginning in 2023, information reported in the Voucher Management System come directly from Yardi VMS reporting, allowing for better tracking and reconciliation.

The last phase of the transition started in October of 2023 which covers the implementation of the general ledger system for Public Housing and Market Rate programs.

This last phase of implementation includes the auxiliary modules (capital fund management, procurement, fixed assets). We expect completion of full enterprise-wide use of the system starting with January 1, 2025 transactions.

The use of an electronic portal, YARDI RentCafe, continued to be rolled out across the entire HACM portfolio. In 2023, it was used for public housing, both for intake and recertification, and for the Low Income Housing Tax Credit new admissions (intake) and recertifications. In 2024, the Housing Choice Voucher department implemented RentCafe for new admissions (intakes) and recertifications. The use of an electronic portal allows faster and more efficient communication with residents/participants.

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

Objectives by year:

2020

- Close financing of Convent Hill South Project
- Parklawn Cyber School and YMCA building disposition
- 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.
- 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

- Pre-development Planning for Arlington, Riverview and Locust Court AMP preservation and revitalization
- Apply for CNI Implementation grant for Hillside

2022

- Look at possibility of re-applying 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.

2023

- Continue to evaluate opportunities for CNI Implementation grants for Near West Side neighborhood, using College Court, Hillside Terrace or other HACM AMPs, or any other assisted housing developments in the area as target housing developments.

2024

- Continue to evaluate opportunities for CNI Implementation grants for Near West Side neighborhood, using College Court, Hillside Terrace or other HACM AMPs, or any other assisted housing developments in the area as target housing developments.

2020 Progress Report:

Ongoing efforts have been made on several activities.

Convent Hill South: Financing has not been established or closed in 2020. This is still in planning stages.

Disposition of community buildings at Parklawn to Central City Cyberschool: Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. This has not yet been finalized.

CNI application for Near West Side: In December 2020 and/or in 2021, HACM intends to apply as applicant or co-applicant for CNI Implementation grant to transform the Near West Side neighborhood, with College Court (WI002000011), other HACM AMPs and/or any other assisted housing developments for families not owned by HACM in the area as target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan.

CNI Planning grant for Hillside: The current regulations in the Notice of Funding Availability for a Choice Neighborhoods Planning grant do not allow former HOPE VI housing sites to apply. Thus, Hillside is currently not eligible for this grant.

2021 Progress Report:
Ongoing efforts have been made on several activities.

Convent Hill South: Convent Hill South continues to remain in the planning stages.

Disposition of community buildings at Parklawn to Central City Cyberschool: Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. This has not yet been finalized.

CNI application for Near West Side: In December 2020, the City of Milwaukee applied as the lead applicant with HACM as the co-applicant for a Choice Neighborhood Implementation (CNI) grant to transform the Near West Side neighborhood, with College Court (WI002000011) and another assisted housing development for families not owned by HACM (Meadow Village) as the target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. In April 2021, the City and HACM were informed that the application was not a finalist for CNI funding. HACM may re-apply in 2021 or 2022.

CNI Planning or Implementation grant for Hillside Terrace: The current regulations in the Notice of Funding Availability for a Choice Neighborhoods Planning grant do not allow former HOPE VI housing sites to apply. Thus, Hillside is currently not eligible for this grant.

Arlington/Riverview/Locust preservation/redevelopment: This is still in pre-planning stages.

2022 Progress Report:
Choice Neighborhood: No updates for CNI grants as no developments are currently eligible under HUD regulations.

Hillside Terrace renovations: Proposed renovation of Hillside Terrace continues in the planning stages, with an estimated start time of 3-5 years.

Convent Hill South: Convent Hill South continues to remain in the planning stages.

Disposition of community buildings at Parklawn to Central City Cyberschool: Discussions continue between HACM and the Central City Cyberschool about the purchase of the facilities used for their day care, elementary and high school. This has not yet been finalized

2023 Progress Report:

There has been no progress regarding CNI grants for other developments, since the HUD eligibility requirements have not yet changed. However, we will continue to evaluate feasibilities of future applications.

Hillside Terrace renovations: Proposed renovation of Hillside Terrace continues in the planning stages, with an estimated start time of 3-5 years.

Convent Hill South: Convent Hill South continues to remain in the planning stages.

2024 Progress Report:

There has been no progress regarding CNI grants for other developments, since the HUD eligibility requirements have not yet changed. However, we will continue to evaluate feasibilities of future applications.

Hillside Terrace renovations: Proposed renovation of Hillside Terrace continues in the planning and pre-development stages, with an estimated start time of 3-5 years.

Convent Hill South: Convent Hill South continues to remain in the planning stages. No new work has been completed in 2024.

2.10 Implement Choice Mobility Initiatives.

Objectives by year:

2020

- 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.
- 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

- 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).
- 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

- 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).
- Continue to provide choice mobility vouchers, if available, to any RAD residents that request one (after one year of living in RAD after conversion).

2023

- 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).
- Implement a HUD HCV Mobility Demonstration program if a grant is awarded by HUD. If the grant application was not successful, apply again if funding is available.
- Continue to evaluate and revise promotional and informational materials regarding Choice Mobility, if needed, with the goal to improve these materials.

2024

- Implement a HUD HCV Mobility Demonstration program if a grant is awarded by HUD. If the grant application was not successful, apply again if funding is available.
- Continue to evaluate and revise promotional and informational materials regarding Choice Mobility, if needed, with the goal to improve these materials.

2020 Progress Report:

Ongoing. HACM's Rent Assistance department, working with the Milwaukee County Rent Assistance program and the Metropolitan Milwaukee Fair Housing Council and the national organization MDRC have developed procedures and protocols to use in a demonstration project called Opportunity MKE. This project will work with rent assistance participants to promote and support choice mobility to neighborhoods of opportunity.

In December 2020, HACM will coordinate and submit an application for a grant from HUD for the Housing Choice Voucher (HCV) Mobility Demonstration grant program. Partners in this program include Milwaukee Metropolitan Fair Housing Council, the Milwaukee County Housing program, and possibly the Waukesha County housing program.

This demonstration will allow participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work together in their regions to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

2021 Progress Report:
Ongoing. HACM's Rent Assistance department, working with the Milwaukee County Rent Assistance program and the Metropolitan Milwaukee Fair Housing Council (MMFHC) and the national organization MDRC have developed procedures and protocols to use in a demonstration project called Opportunity MKE. This project will work with rent assistance participants to promote and support choice mobility to neighborhoods of opportunity.

Through June 2021, the number of participants has been less than expected. HACM and MMFHC have entered into a data sharing agreement to allow MMFHC to do direct promotion of the program to HACM participants via phone and mail. HACM and MMFHC continue to evaluate progress, challenges, and identify potential barriers to participation in the program and to make policy or procedural changes when practical to reduce barriers.

In December 2020, HACM submitted an application for a grant from HUD for the Housing Choice Voucher (HCV) Mobility Demonstration grant program. This demonstration will allow participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work together in their regions to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

Partners in this program include Milwaukee Metropolitan Fair Housing Council and the Milwaukee County Housing program. In late spring 2021, HUD informed HACM that its proposal was unsuccessful and did not receive funding. If there is a second round of funding, HACM plans to re-apply for a similar Housing Choice Voucher Mobility demonstration grant.

2022 Progress Report:
Opportunity MKE: Number of families enrolled in the Opportunity MKE choice mobility demonstration project as of July 2022 are as follows:

	# Attained	# Needed
# Families enrolled	242	280
From HACM	214	
From Milwaukee County Housing Auth	27	

From Waukesha Housing Auth	1	
# Families in Program Group		200
From HACM	106	
From Milwaukee County Housing Auth	12	
From Waukesha Housing Auth	1	
# Families in Control Group		200
From HACM	108	
From Milwaukee County Housing Auth	15	
From Waukesha Housing Auth	0	

HUD HCV Mobility Demonstration Grant Program: In late 2022, HUD plans to release a Notice of funding availability for another round of the HCV Mobility Demonstration program. HACM plans to submit a new application for this program, in partnership with Milwaukee Metropolitan Fair Housing Council and the Milwaukee County Housing program.

This demonstration will allow participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas. In addition to offering mobility-related services, participating PHAs will work together in their regions to adopt administrative policies that further enable housing mobility, increase landlord participation, and reduce barriers for families to move across PHA jurisdictions through portability.

2023 Progress Report:

Housing Mobility Related Services Grant: On June 1, 2023, HUD issued a Notice of Funding Opportunity (NOFO) for a Housing Mobility Related Services grant, with grant applications due August 30, 2023. The Metropolitan Milwaukee Fair Housing Council (MMFHC) contacted HACM and wanted to partner with HACM on an application for the HUD Mobility Services grant.

HACM staff reviewed the NOFO application and program implementation requirements. Given that the current top priority for the Rent Assistance program is to implement Corrective Action Plans from HUD to improve utilization and performance, HACM Senior Management believes it unfortunately does not have sufficient capacity to apply for and implement a new mobility services program.

MMFHC has offered to assist with the application and many of the activities during implementation as a subcontractor to HACM under the grant program. However, after careful review, HACM staff believe it would still entail a significant amount of HACM assistance, data, and time to apply for and implement the program. In the end, HACM does not believe it has the capacity to take this on as well as implement the required HUD Corrective Action Plans.

HACM has informed MMFHC that it could potentially apply in future years, though MMFHC has expressed their concern that this grant funding may not be available in future years or that experienced staff may not be available in future years.

2024 Progress Report:

No changes from 2023

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

Objectives by year:

2020

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- 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.
- Submit for a CNI Planning grant for Hillside Development.
- Apply for Housing Trust Fund grants as needed.

2021

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- 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.
- Submit for a CNI Planning grant for Hillside Development.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.

2022

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- If unsuccessful in 2020, reevaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College Court, other HACM AMPs or any other assisted housing developments in the area as target housing developments.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.
- Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

2023

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.
- Re-evaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College Court, Hillside Terrace, other HACM public housing AMPs or any other assisted housing developments in the area as target housing developments.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.
- Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

2024

- Apply for Affordable Housing Program grants to support financing of new construction and rehabilitation of development projects.

- Re-evaluate applying as applicant or co-applicant for CNI Implementation grant for Near West Side neighborhood in 2022 or 2023 using College Court, Hillside Terrace, other HACM public housing AMPs or any other assisted housing developments in the area as target housing developments.
- Apply for Housing Trust Fund grants as needed.
- Review other possible grants to apply for, including supportive service grants.
- Attempt to identify other potential partners or possible funding for various types of emergency housing assistance (beyond payment of rent) that may be needed by residents or applicants.

2020 Progress Report:
Ongoing.

Affordable Housing Program (AHP) Awards: HACM received two AHP awards in 2019. Federal Home Loan Bank of Chicago awarded Holton Terrace and Federal Home Loan Bank of Pittsburgh awarded Westlawn Renaissance III. HACM has 3 addition applications for Merrill Park, Becher Court and Westlawn Renaissance VI that are pending in 2020 and HACM will continue applying for this program when feasible.

CNI application for Near West Side: In December 2020 and/or in 2021, HACM intends to apply as applicant or co-applicant for CNI Implementation grant to transform the Near West Side neighborhood, with College Court (WI002000011), other HACM AMPs and/or any other assisted housing developments for families not owned by HACM in the area as target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan.

2021 Progress Report:
Ongoing.

CNI Planning grant for Hillside: The current regulations in the Notice of Funding Availability for a Choice Neighborhoods Planning or Implementation grant do not allow former HOPE VI housing sites to apply. Thus, Hillside is currently not eligible for this grant.

Affordable Housing Program (AHP) Awards: HACM was not successful in 3 applications for AHP grants: Merrill Park, Becher Court and Westlawn Renaissance VI. HACM will continue applying for this program when feasible and is currently planning on applying for Westlawn Ren. V.

CNI application for Near West Side: In December 2020, the City of Milwaukee applied as the lead applicant with HACM as the co-applicant for a Choice Neighborhood Implementation (CNI) grant to transform the Near West Side neighborhood, with College Court (WI002000011) and another assisted housing development for families not owned by HACM (Meadow Village) as the target housing developments. Marquette University previously was awarded an FY 2018 Choice Neighborhood Planning grant for the Near West Side neighborhood to develop a transformation plan. In April 2021, the City and HACM were informed that the application was not a finalist for CNI funding. HACM may re-apply in 2021 or 2022.

2022 Progress Report:
Choice Neighborhood: No updates for CNI grants as no developments were currently eligible.

Affordable Housing Program (AHP) grants: In Fall 2021, an AHP grant was submitted for Westlawn Renaissance V.

American Rescue Plan Act (ARPA) funding: HACM submitted an application to the City of Milwaukee in August 2021 for $9,000,000 to assist with the Westlawn Revitalization to help to fill a $15 million financing gap. This was awarded by the City in late 2021. In addition, HACM was part of a City of Milwaukee application to the State of Wisconsin for an additional $6 million from the State.

2023 Progress Report:
Choice Neighborhood: No updates for CNI grants as no developments were currently eligible.

Affordable Housing Program (AHP) grants: In 2023, HACM has not submitted any AHP applications.

American Rescue Plan Act (ARPA) funding: HACM submitted an application to the City of Milwaukee in August 2021 for $9,000,000 to assist with the Westlawn Revitalization to help to fill a $15 million financing gap. This was awarded by the City in late 2021. In addition, HACM was part of a City of Milwaukee application to the State of Wisconsin for an additional $6 million from the State. Both amounts were awarded during 2022.

2024 Progress Report:
Choice Neighborhood: No updates for CNI grants as no developments were currently eligible.

Affordable Housing Program (AHP) grants: In 2024, HACM has not submitted any AHP applications.

American Rescue Plan Act (ARPA) funding: HACM submitted an application to the City of Milwaukee in August 2021 for $9,000,000 to assist with the Westlawn Revitalization to help to fill a $15 million financing gap. This was awarded by the City in late 2021. In addition, HACM was part of a City of Milwaukee application to the State of Wisconsin for an additional $6 million from the State. Both amounts were awarded during 2022. Activities are ongoing.

2.12 Develop/Implement Comprehensive Housing Plan

Objectives by year:

2020

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2021

- Continue to look for opportunities to obtain Moving-to-Work type plan.

2022

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2023

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2024

- Submit regulatory waivers whenever possible.
- Submit application for Moving to Work or its successor program.

2020 Progress Report:

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2020, we continue to review the potential for such a program.

2021 Progress Report:

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2021, we continue to review the potential for such a program.

2022 Progress Report:

Ongoing. HACM continues to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible.

During 2022, the Wisconsin State Legislature passed legislation to allow housing authorities of a first-class city (i.e., Milwaukee) to develop mixed income housing developments for persons of low or moderate income if the property was wholly or partially owned prior to 10/1/2021 (2021 Wisconsin Act 196).

While we have not submitted an application for a Moving to Work program in 2022, we continue to review the potential for such a program.

2023 Progress Report:

Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2022, we continue to review the potential for such a program.

HACM will continue to collaborate with the City of Milwaukee in areas where we can be of assistance in delivering the City's affordable housing goal.

2024 Progress Report:
Ongoing. We continue to work on identifying potential regulatory waivers and bringing to the attention of HUD whenever possible. While we have not submitted an application for a Moving to Work program in 2022, we continue to review the potential for such a program.

HACM will continue to collaborate with the City of Milwaukee in areas where we can be of assistance in delivering the City's affordable housing goal.

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

Objectives by year:

2020: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.
2021: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.
2022: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.
2023: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.
2024: Will continue to evaluate the CFFP plan to determine if it benefits the Housing Authority.

2020 Progress Report: Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2020 at this time.

2021 Progress Report: Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2021 at this time.

2022 Progress Report: Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2022 at this time.

2023 Progress Report: Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2023 at this time.

2024 Progress Report: Ongoing review to see if there is potential benefit to HACM, although we do not foresee implementing a Capital Fund Financing Program (CFFP) during 2024 at this time.

2.14 Ensuring HACM's sustainability by effectively responding to crises, such as the COVID-19 pandemic, that require changes in business practices to protect residents and employees.

Objectives by year:

2020

- Redesign business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Procure PPE (personal protective equipment) to assist with objective #1.
- 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

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- Continue to procure PPE (personal protective equipment) to assist with objective #1.
- 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

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- 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.

2023

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- 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.

2024

- Continue to reevaluate business practices to ensure appropriate physical distancing during interactions between residents and staff to ensure safety of both.
- 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.

2020 Progress Report:

Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 and on eviction moratorium to HACM residents.
- Encouraging proper hand washing and use of sanitizer when hands can't be washed.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Procurement of personal protective equipment (PPE) such as appropriate disinfectant materials, masks, gloves, hand sanitizer, etc.
- Enhanced disinfection of common areas and surfaces for housing developments and offices.
- Prioritizing emergency work orders and pest control during times when access to apartments is limited.
- Distribution of over 20,000 face masks to HACM residents.

2021 Progress Report:

Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 and on eviction moratorium to HACM residents.
- Encouraging proper hand washing and use of sanitizer when hands can't be washed.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Procurement of personal protective equipment (PPE) such as appropriate disinfectant materials, masks, gloves, hand sanitizer, etc.
- Enhanced disinfection of common areas and surfaces for housing developments and offices.
- Prioritizing emergency work orders and pest control during times when access to apartments is limited.
- Distributing and promote information on the COVID-19 vaccine, including locations and times of vaccination sites. Partnered with the City of Milwaukee Health Department and other organizations such as federally qualified health centers and pharmacies to provide transportation to vaccination sites or hold onsite vaccination clinics in housing developments. In HACM's highrise/midrise buildings, this resulted in vaccination rates ranging from 45% to 80% of residents being fully vaccinated.
- HACM continues during the summer 2021 to heavily promote vaccination, including door-to-door community mobilization and immunizations in our family developments.

2022 Progress Report:

Ongoing. In light of the COVID-19 pandemic, HACM has redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments, including:

- Distributing information on COVID-19 to HACM residents.
- Ensuring appropriate physical distancing in HACM developments and offices, such as: reduced in-person contact; avoiding face-to-face meetings where possible and substituting online virtual meetings; and allowing some staff whose job duties allow it to work from home where possible.
- Distributing and promote information on the COVID-19 vaccine, including locations and times of vaccination sites. Partnered with the City of Milwaukee Health Department and other organizations such as federally qualified health centers and pharmacies to provide transportation to vaccination sites or hold onsite vaccination clinics in housing developments. In HACM's highrise/midrise buildings, this resulted in vaccination rates ranging from 45% to 80% of residents being fully vaccinated.
- HACM continues during 2022 to promote vaccinations including booster shots, through partner agencies including on-site clinics at developments when possible.
- HACM continues to provide technical assistance to residents to assist in completing Emergency Rent Assistance applications to agencies such as SDC if any resident owes back rent for reasons due to the COVID pandemic

2023 Progress Report:

- During the COVID-19 pandemic, HACM had redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments. While the national public health emergency declaration from the President ended in May 2023, HACM continues to utilize tools and procedures that were redesigned in light of the pandemic, including increased use of technology, virtual meetings, etc.

2024 Progress Report:

- During the COVID-19 pandemic, HACM had redesigned its business practices and procedures to follow the guidance from the Centers for Disease Control and the State and local health departments. While the national public health emergency declaration from the President ended in May 2023, HACM continues to utilize tools and procedures that were redesigned in light of the pandemic, including increased use of technology, virtual meetings, etc.

The use of an electronic portal, YARDI RentCafe, continued to be rolled out across the entire HACM portfolio. In 2023, it was used for public housing, both for intake and recertification, and for the Low Income Housing Tax Credit new admissions (intake) and recertifications. In 2024, the Housing Choice Voucher department implemented RentCafe for new admissions (intakes) and recertifications. The use of an electronic portal allows faster and more efficient communication with residents/participants.

TAB

B.5. Most Recent Audit

B.5. Most Recent Fiscal Year Audit.

HACM does not yet have the calendar 2023 audit. Below are the findings related to the 2022 audit.

2022 AUDIT:
The Independent Public Accountant (IPA) noted material weaknesses which are also the same findings noted in the Quality Assurance Division's audit and Field Office Review. As a result of the required Corrective Action Plan (CAP), HACM is required to do a 100% file review and financial reconstruction of Section 8 reserve accounts which takes a longer time to complete. As a result, the financial statement audit was not completed before the September 30, 2023 deadline to HUD. In addition, the IPA is unable to issue an unmodified opinion on the financial statements and single audit until the required CAP is completed. Below are the details of the audit findings.

Finding 2022-001: Material Weakness - Internal Control Over Financial Reporting

Condition: There is a lack of internal controls over financial reporting which does not provide reliable and accurate information used in preparation of the year-end financial statements. Material misstatements (including a restatement related to proper reporting of Housing Assistance Payment accruals) were discovered as part of the audit process. In addition, there was an account reconciliation provided for audit purposes that contained an unreconciled variance of $2,561,093. Furthermore, the Authority has received communications from their major funding agency and us, as your auditor, from prior periods that pertain to inaccuracies in financial reporting that have not been corrected for the current fiscal year.

Management Response: We discovered those additional prior period (2021) accruals on Housing Assistance Payment (HAP) as we reviewed and corrected the set-up of the system that we fully implemented in 2020. We now fully understood how the system works, how and what reports should be generated to ensure that all HAP expenses are reported in the proper accounting period. We will also continue to investigate and resolve the outstanding reconciling accounts and ensure that correct accounts are recorded in the proper period. We had hired two senior accountants bringing the total to four staff with adequate knowledge and skill sets to keep our books of accounts accurate and updated. We expect to reduce or eliminate late recording of transactions which are processed through journal entries. These accountants are responsible for timely and accurate reporting, and assisting the Finance Director financial management of our four major program areas: Public Housing, Section 8, Market and Affordable Housing, and HACM's Construction and Development instrumentality. We will also be requiring them to attend the regular operations meeting so they can be abreast of developments that will have financial implications.

Finding No. 2022-002: Material Weakness - Segregation of Duties

Condition: The Authority operates its accounting and reporting function with a limited number of individuals, which precludes a proper segregation of duties. A large volume of transactions are processed by a limited number of individuals, and in some cases, only one person may process and record a transaction. Furthermore, the Authority has received communications from their major funding agency and us, as your auditor, from prior periods that pertain to incompatible duties in the financial reporting process that have not been corrected for the current fiscal year.

Management Response: We believe that adequate segregation duties organizationally are in place. However, we do agree that in the recent years, as result of the new system implementation, access and security controls for certain staff that has authorization and recording/transactional responsibilities were not yet properly defined and set up. We are currently reviewing and setting up proper security controls with the hiring of our system database administrator who already has years of experience on the new system we implemented. We are also formalizing standard operating procedures to ensure that the process is clear to everyone involved in the processing of transactions. In addition, we are currently working on the Corrective Action Plan that we agreed with our funding agency.

Finding No. 2022-003: Material Weakness, Material Noncompliance - Housing Choice Voucher Program Scope Limitation
Finding No. 2022-004: Material Weakness, Material Noncompliance - Housing Choice Voucher Program Scope Limitation

Cause: The Authority does not have an appropriate internal control system that allows for proper review, analysis and implementation of financial reporting and compliance requirements in a timely manner, nor to a satisfactory level. Documentation supporting eligibility determinations and program expenditures is deemed unsatisfactory.

Management Response: We are currently working on the Corrective Action Plan that is agreed with both HUD – Quality Assurance Division and Milwaukee Field Office, resulting from their review. We have invested significant efforts and resources in: Fully implementing our enterprise-wide system with assistance of the software provider to ensure correct set up and process implementation; Documenting standard operating procedures for clarity and consistency of application; Re-structuring the Housing Choice Voucher organization; Institutionalizing training to all staff; Hiring for adequate staffing and skill sets; and Contracting with outside vendors. These will ensure that our Housing Choice Voucher operations will be in continuous compliance with program regulations and accurate and timely financial reporting.

TAB

C.1.
RAB Hearing Comments

RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

2025 Annual PHA Plan

1. RAB Comments: How much time does the RAB have to provide comments on this year's agency plan?

HACM Response: For inclusion in the draft of the Agency Plan, RAB comments that are received by July 29th will be included in the initial draft. However, any RAB member can also send comments to Ken Barbeau or LaKeidra Madison after that for inclusion, or can formally submit them in writing to HACM prior to the September HACM Board of Commissioners meeting, or can attend the Public Hearing at the September Board meeting to provide comments in person. The Public Hearing is at the September HACM Board of Commissioners meeting on Wednesday, September 11, 2024 at 3:00 p.m. at City Hall, Room 301-A, 200 E. Wells Street, Milwaukee, Wi 53202.

After the public hearing, the Board of Commissioners will vote on the documents and any additional changes at the October Board meeting. The Annual PHA Plan and 5-Year PHA Plan are required to be submitted to HUD by October 17, 2024.

2. Grievance Procedures: When were the revised Grievance Procedures reviewed by the RAB in 2023 approved by the Board of Commissioners?

HACM Response: The revisions to HACM's Grievance Procedures for Federally-Assisted Public Housing were approved by the HACM Board of Commissioners along with a revised Public Housing lease at their meeting on December 13, 2023.

3. Homeownership: Can a Project-Based Voucher participant who is accepted into the Housing Choice Voucher (tenant-based program) use their voucher immediately for Section 8y Homeownership, or do they need to wait for a period of time?

HACM Response: One of the eligibility criteria is that the household must not be in the initial first year of the HCV HAP contract. Therefore, they must wait for a year before they can convert their voucher into a Section 8y voucher to use for their mortgage.

4. Public Safety: Often, residents and resident organizations are not updated about an investigation. One example is the theft of a television from a common area and two break-in's into the vending machines earlier this year at one housing development.

HACM Response: There are two things that HACM cannot do: share personally-identifiable information about another resident (unless it is already public information such as if they were

charged with a crime) or if there is an active Milwaukee Police Department investigation (so that we do not impact that investigation). We can share general information, however, regarding the items. We will be setting up a meeting with that building's resident organization to update them on what information is possible to share regarding those incidents.

5. Security Cameras: There is a discussion in the Agency Plan about obtaining new security cameras in new locations or replacing outdated old cameras with newer ones. Can we get those cameras expedited?

HACM Response: HACM is continually reviewing the need for additional security cameras or replacing older cameras, and trying to prioritize based on: (1) the need and risk of crime in the specific location in the development; and (2) the available budget or other funding (e.g., grant, etc.) for such equipment in that housing development.

6. Public Safety: Can the RAB receive a copy of the revised Memorandum of Agreement between HACM and the Milwaukee Police Department (MPD)?

HACM Response: Yes, we will provide a copy to RAB members.

7. Pet Policy: One RAB member felt that some residents are having larger and more aggressive breeds such as pit bulls and rottweilers. She is not sure if the dog is a pet or an assistance animal. However, she feels that if we are required to allow these in the case of an assistance animal, that HACM should require the owners to have personal liability insurance.

HACM Response: In our revision of policies regarding Assistance Animals after issuance of FHEO Notice 2020-01 and other HUD/DOJ guidance on the subject, HACM had originally proposed to incorporate restrictions on breeds that had restrictions in our pet policies, such as pit bulls and rottweilers. However, on advice of our legal counsel, it was determined that such a breed restriction for an approved assistance animal could be a violation of fair housing regulations, and so it was removed from the policy.

Regarding the subject of insurance: Page 10-9 of the HACM Admissions and Continued Occupancy Policy states that "PHAs may not require pet owners to obtain or carry liability insurance." This language is based on the Code of Federal Regulations 24 CFR 5.318 (d)(5) which states, "project owners or PHAs may not prescribe pet rules that impose additional financial obligations on pet owners that are designed to compensate the project owner or PHA for costs associated with the presence of pets in the project, including (but not limited to) requiring pet owners: (i) To obtain liability or other insurance to cover damage caused by the pet"

Thus, based on our review, it does not appear that a public housing authority can impose a requirement for a resident to obtain personal liability insurance on a pet or on an assistance animal.

8. Substantial Deviation/Significant Amendment to Agency Plan: One RAB member thought that some of the significant amendment thresholds listed in the Agency Plan were too high, such as the addition of a capital fund project that is not included in the current 5-year action plan of $1,000,000 or more. They felt these amounts should be revised to a smaller threshold amount.

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

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

The significant amendment policy that was approved by the HACM Board of Commissioners in 2018 was that the significant amendment/public hearing process should not be triggered by minor changes in a capital budget or in minor wording changes. Rather, it should be reserved for items such as major changes or additions to a capital item, material changes to rent policies, admissions policies, etc., or major changes on demolition, disposition or conversion activities.

The definition of significant amendment included items such as the addition of a capital fund project that is not included in the current 5-year action plan of over $1,000,000. The determination was that a smaller change of $100,000 or several hundred thousand in the capital budget of $8 million for one year did not appear significant enough compared to the annual or 5-year capital plan to require a public notice process for a public hearing before the Board of Commissioners. In addition, this larger threshold is not unusual for larger public housing authorities.

9. HOPE VI/Choice Neighborhood program: Is this list of developments in an order by priority for applying for a CNI grant?

HACM Response: No, the order of the developments in this section is mostly alphabetical and is not in any order by priority. We have listed all possible public housing developments so that in the event that a development was eligible for a CNI grant, we could immediately begin an

application and not wait for a process to amend the Annual PHA Plan to include the development in it.

10. HOPE VI/Choice Neighborhoods: When was the last time that a Scattered Sites development received one of these grants?

HACM Response: Milwaukee received a $19.5 million HOPE VI grant in 2003 for Scattered Sites and a HOPE VI grant for $6.7 million in 2008 for additional Scattered Sites. In both of these, older scattered sites were demolished and replaced with new buildings.

11. RAD: Are there any RAD conversions that are upcoming or identified yet?

HACM Response: HACM continues to evaluate all developments for the potential for a transformation, using RAD, Section 18 disposition, or a blend of both. To move forward, we would need to ensure the housing development is eligible for the conversion and identify funding/financing sources for the conversion. We have not identified the next development that will be examined for possible RAD conversion yet.

12. LIHTC and RAD: When you are looking for an investor, keep in mind that residents can be the investors/owners as well. This was done somewhere else in the country, possibly in Massachusetts.

HACM Response: HACM typically puts out a Request for Proposals for Equity Investors so that the procurement process is competitive. We are not aware of any resident organizations that have purchased the equity investment in a housing development, but please feel free to email any information you have on it or we can inquire with HUD. We believe there may be barriers for a resident organization to be the equity investor, including: (1) the ability to pay for the low income housing tax credits (LIHTC); and (2) the fact that the income tax credits would not be worth anything to a resident organization since the RO is not an entity that pays income taxes.

HACM is aware that HUD has a separate regulation regarding the disposition (sale) of a public housing development or a portion of a development. In those cases, a PHA shall offer the eligible resident organization the opportunity to purchase the property, if the resident entity has expressed an interest in purchasing the property for continued use as low-income housing and if they can obtain financing within 60 days.

However, this rule for a disposition does not include situations where a public housing authority seeks a disposition outside the public housing program to privately finance or otherwise

develop a facility to benefit low-income families, such as a day care center, administrative building, mixed-finance housing, or other types of low-income housing.

13. Designated Housing Plan: There was a concern by some of the RAB members about newer residents in general. The RAB member said it was not just an issue of older residents vs. younger disabled residents—she admitted some of the issues in our developments also come from older residents. However, the RAB member asked about what was done to review new resident background checks?

HACM Response: HACM does plan to submit an application to HUD for a new designated housing plan. It has been delayed due to other priorities related to Corrective Action Plans. Once it is submitted, it would need to go through a detailed review by HUD's Fair Housing and Equal Opportunity division.

HACM wants to clarify Designated Housing is only applicable to public housing developments.

For RAD/LIHTC developments, at the time of conversion, HACM can no longer designate units only for elderly or persons with disabilities. For these developments that were formerly in a designated housing category, HACM could and did create a wait list preferences for elderly, near elderly, and persons with disabilities.

In the meantime, HACM may also investigate the possibility of creating a preference for seniors and/or persons with disabilities for public housing. This is different from "designated housing" as it is a preference, and not an eligibility issue, but we will look into this possibility.

Criminal background checks are run on all applicants to our housing developments; we review a State of Wisconsin Department of Justice criminal background check and a CCAP (Consolidated Court Automation Program) background check. HACM specifically looks at crimes of violence against persons or properties or drug offenses, and can go back up to 3 years.

When using background checks, PHAs also have to be careful to follow HUD regulations on fair housing in criminal background checks, and look at convictions rather than just arrest information. In addition, on 4/10/2024, HUD issued a proposed rule on Reducing Barriers to HUD-Assisted Housing that could change these regulations again. We will review this rule once it is finalized by HUD to ensure HACM is in compliance.

Additionally, we also want to point out that often it is not the actual resident who creates the issues. They may have a clean background. Rather, it is the persons that they associate with

that create issues in our developments, and then we need to hold them accountable for their guest's actions.

In addition, we do landlord references for the past year (one year) ask about other conduct that may impact other residents' health, safety and welfare. We have a proposed revision in our Admissions and Continued Occupancy Policy (ACOP) to increase this landlord check back to the previous policy of reviewing where they lived the past 3 years.

14. Progress Report, Goal 2.2 Implementation of Westlawn Choice Neighborhood grant: What is the Black Business Boost program and would businesses outside of the Westlawn CNI neighborhood be assisted?

HACM Response: The Business Boost program is managed by WWBIC and funded by PNC Bank. While the CNI neighborhood was targeted, it was open to businesses in the Milwaukee area. The Business Boost program encourages entrepreneurs to position their small businesses as a pathway to building generational wealth. It is open to start-up and existing businesses, and takes participants on a sequenced journey through four building blocks that remove the traditional barriers in accessing capital.

Earlier this year, WWBIC announced that they were still working with ongoing participants, but that the program had reached full capacity and is no longer accepting new applications. They recommend all entrepreneurs to take advantage of free business training offerings from WWBIC that are listed on the website: https://www.wwbic.com/trainings/

Also, for entrepreneurs in need of access to capital, they offer the following resources:

WWBIC lending: https://www.wwbic.com/business-lending/

Kiva@WWBIC: https://www.wwbic.com/kiva/

15. Progress Report, Goal 2.2 Implementation of Westlawn Choice Neighborhood grant: While the CNI grant is ending, can the Best Baby Zone (BBZ) project be continued?

HACM Response: The BBZ program was originally managed by United Way until their funding for the program was completed. At that point, HACM stepped in to continue as fiscal agent and to coordinate the program as a CNI initiative until December 2023. Due to program funding being fully expended, HACM cannot sustain ongoing program coordination. HACM has worked with the BBZ resident ambassadors to transfer the program to another organization or group that has the capacity to sustain the initiative activities, if one is identified.

16. Budgets—One RAB member wanted to point out that many residents support full-time property managers and full-time maintenance staff at a development, and feel that it is important to have them full time rather than split.

HACM Response: HACM would prefer to have staff assigned 100% to one development as well. However, this is not always possible.

In some cases, it is an issue of staff capacity ---if we have a staff person out on some type of leave, we try to fill in as best we can with another staff person who may be trying to cover two developments. Thus, this may be a temporary assignment until the person returns from leave.

In other cases, it is a budgetary issue. Depending on the housing development's budget, it may not be possible to have a property manager or a maintenance mechanic that is 100% dedicated to one development. Instead, it may make more financial sense working within the available budget to split the person's time between two smaller developments, so that they are covering a similar number of units as someone that works at a larger housing development that has more units.

17. Smoking: Similar to comments about unauthorized pets, RAB members also mentioned that, several years after smoking was banned in most HACM housing (public housing and RAD developments), there still are persons that smoke either in their unit or just outside the door. What can management do?

HACM Response: Even though every resident signs a lease addendum regarding the no-smoking policy, there continue to be issues with smoking in or near to housing. When we have direct evidence of smoking, we do follow our policy which includes a graduated approach to reiterate the policy with the resident and offer other assistance (such as smoking cessation support). However, it can be a challenge in enforcing the policy as it is often not evidence or the smell cannot be attributed to one unit.

HACM will add language into the Agency Plan that HACM will do more outreach and education in the next year in restating the rules , and will work to ensure staff are aware of importance of using the graduated process of handling these types of lease violations.

RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

5-Year PHA Plan

18. Section B2, Goal 1, "Objective 1: Optimize use of the Yardi Software system, including RentCafe portals for applicants, residents/participants, and landlords."

Several RAB members pointed out that while some of them prefer using RentCafe rather than paper and find use of it very easy, other residents are struggling with it. They said that everyone is not there yet in terms of knowledge or technology. They asked if there were ways that staff could be available by appointment or during certain hours to assist persons in how to use RentCafe and enter information into it? Or, can residents be trained so that they can assist other residents?

HACM Response: HACM agrees with the RAB that the biggest barrier to use of RentCafe is for a resident or applicant to log in and register for the first time. If they can do that and remember their password, the software does walk them through the process for most person. The long-term goal is to move towards use of automated software, which will simplify and shorten the process by reducing mailing of documents back and forth.

However, the RAB's points are well-taken in the short-term. In most housing developments, HACM management office staff have assisted residents in logging on and completing their paperwork. In the Rent Assistance office, there are certain hours set aside for assisting residents with RentCafe. Also, Resident Liaison staff have assisted with helping residents complete their recertification paperwork online.

HACM agrees that RentCafe technical assistance needs to be provided for residents, as necessary, in a consistent manner from program to program, and development to development.

We also agree that different residents may need different levels of assistance. For some, just the availability of a computer to work on may be helpful. For others, it may be assistance with resetting of a forgotten password or with logging on for the first time. And for some, it may be assisting them through training on their first recertification or an initial intake process, including necessary attachments.

HACM will modify the current objective or will include a new objective under this goal to include a commitment by HACM to providing technical assistance and training for applicants and residents.

19. Section B2, Goal 1: Speaking of technology, one RAB member asked why it takes so long for money to come out of her bank account and get credited to her resident ledger, after paying with a check?

HACM Response: Payments need to get posted to the resident ledger by either the management office or the accounting department. Payments can be through ACH (direct debit) or via personal check or money order. Postings can be late for a few reasons, including but not limited to: (1) staff out on vacation or leave and so the posting is delayed; (2) technical issues with the posting through Yardi.

If you notice that a payment that you made has not cleared your bank in a reasonable amount of time, or has not been credited on your resident ledger, please follow up with your property manager so it can be investigated by them and our Accounting dept.

20. Section B2, Goal 1, RentCafe and Accessibility: YARDI RentCafe has issues with ADA accessibility with RentCafe. It does not work appropriately with devices used by blind individuals.

HACM's RentCafe portal adheres to Website Content Accessibility Guidelines (WCAG) 2.1, Level AA standards in the design, testing, and development of its website experiences.

Any residents who need a reasonable accommodation for themselves or a member of their household should contact HACM at 414-286-5678 (voice) or 414-286-3504 (TDD).

HACM is aware of one resident at the development mentioned who is visually impaired. Staff has been in touch with that resident to determine their communication preferences and to address any issues.

21. Section B2, "Goal 2: Maintain optimal occupancy rates for HACM's public and affordable housing developments and improve PHAS score for Public Housing to improve HACM back to a standard performer, and eventually as a high performer."

Are applicants still given a choice to pick where they want to live?

HACM Response: Since Public Housing has one waiting list, residents selected off that wait list are offered choices of developments with available ready units at the time the application is approved.

Since Project-Based Vouchers (PBVs) have site-based waiting lists (specific to that one development), when they are selected off that wait list and approved, they are only offered a unit at that development, in the bedroom size they are eligible for. They cannot select another

PBV development. So, for example, if you were selected off the Merrill Park PBV wait list, you cannot just change it to a different housing development.

22. Section B2, Goal 2: The draft objectives emphasize filling vacancies quickly. Would not another way to maintain high occupancy be to reduce the number of move-outs?

HACM Response: This is an excellent suggestion. Yes, reducing resident turnover would also help to maintain our occupancy rates. Resident retention is improved when: (1) a landlord provides good communication with residents and responds to resident requests in a respectful manner; (2) a landlord deals with maintenance requests timely; (3) a landlord takes action with neighbors that are causing issues or disturbing the residents' peaceful enjoyment of their apartment; and (4) landlords and residents maintain street appeal and cleanliness.

HACM will add another objective under this goal related to resident retention.

23. Section B2, "Goal 3: Maintain optimal utilization rate for the Housing Choice Voucher program within the funding that is available from HUD and ensure all policies and procedures have been updated to ensure that the voucher program assists applicants/participants to the greatest extent feasible. Also improve SEMAP scores to return from a troubled status to a standard performer, and eventually to high performer status."

With the 100% participant file review, when they do rent calculations and if something was miscalculated, if the rent decreases and the Housing Assistance Payment increases, I'm assuming that HACM will need to reimburse the resident. What happens if it goes the other way—if the voucher participant now owes more for some reason?

HACM Response: HACM has never been in the situation of having to do a 100% file review before. The selected Contractor that will be managing and operating the voucher program will be working closely with both HUD and HACM to determine what should be done in each situation. HUD does often require voucher holders to pay if they were undercharged. However---It probably will depend on a number of different circumstances. Was it income that the participant did not disclose to HACM at that time? Was the amount significant? Was it instead an error on HACM's part? We will work with the Contractor and HUD to determine how HUD wants us to resolve each type of discrepancy.

24. Section B2, Goal 3: PBVs: I'm a RAB member and I never heard of some of these buildings that are not owned by HACM but have PBVs. You need to include these in some list so that we understand what they are.

HACM Response: There are a few buildings not owned by HACM that have PBVs, though they are not many. We will put a list of buildings owned by other developers/entities in which HACM has awarded PBVs and will provide it to the RAB. We can also look to see if we can include the information in our Agency Plan or Admin Plan.

25. Section B2, Goal 3: RFP for Management and Operation of the HCV Program: Can we review the credentials of the selected Contractor? Also, will that Contractor be invited to attend RAB meetings regularly?

HACM Response: Once the HACM Board of Commissioners has approved a final recommendation of all the proposals submitted, we will bring information to the RAB regarding the process and describe the experience and credentials of the selected Contractor. In addition, at some point during the transition, we may ask the Contractor to do a presentation to the RAB. When issues arise for the RAB that are related to the voucher program, we anticipate the Contractor or their representative will be asked to attend the RAB meeting to discuss.

26. Section B2, "Goal 4: Enhance housing quality, safety and security, and resident qualify of life, through staff training, accountability, collaboration with partners, resident engagement, and strong customer service."

A RAB member said that some of HACM's public safety dispatchers and some other HACM staff are very nonchalant. They seem like they do not know how to talk with people. If you want to improve customer service, this needs to change.

HACM Response: Thank you for your feedback. HACM expects each staff person, no matter their job title, to provide good customer service and to communicate with our residents professionally, with honesty, dignity, and respect. HACM is looking into the process and cost of having the ability to record telephone calls to our dispatch center, so that we can have the recordings with both the resident and our staff. In this way, we can check when there are reported issues or questions.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

27. ACOP, Chapter 3, Eligibility: A long time ago, HACM used to do home visits to people's current apartments to see how clean they kept their unit, etc. I know that has not been done in years, but perhaps there are other ways to obtain that information like interviewing the applicant.

HACM Response: Except for some very small housing authorities, most PHAs have stopped performing home visits of applicants as they were inefficient and slowed down the applicant/approval process. This is why we are putting forward the proposed revision to obtain landlord references for the past 3 years of their housing, rather than one year. This will enable us to get more information to use in screening to ensure their suitability as a tenant.

28. ACOP, Pets: We have more and more issues with residents having pets or assistance animals and these are getting to be out of control in some developments. As residents, we do not know if they are approved or not. We report them to property management but do not hear back and do not know if the manager checked them out. Some dogs are running around without a leash or the resident is not picking up the dog's poop. The residents are also letting their children run wild. What can we do?

HACM Response: The Vice President of Asset Management has requested all managers to inspect when there is a report of an unauthorized dog or other animal, and to check to ensure that the animal was appropriately approved under the rules of that development. If a pet is unauthorized, the resident should get a 30-day curable notice to get rid of the pet to another person or organization. In addition, even if a pet has been appropriately approved as an assistance animal, they still need to follow all other rules regarding them: they must be leashed and they must clean up after their animal. Otherwise, that is also a lease violation. While we cannot release detailed information, the property manager should be able to inform a resident whether or not an animal has been approved under our policies. We will work with property management and maintenance to reiterate our rules over pets and assistance animals, and for them to report and investigate suspected pets.

RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

ACOP, Chapter 8, Leasing: The term "Self-Inspections" is confusing. I thought at first it was a resident inspecting their own unit, but it was HACM inspecting.

HACM Response: Yes, we agree that it is confusing. I am not sure whether this is a HUD Nspire term or whether it is a Nan McKay term. It used to be called annual inspections (by a PHA). Now, they are called "self-inspections" in that the PHA is inspecting the unit themselves as opposed to a REAC inspection where a 3rd party is inspecting the unit. In reality, there is no difference from the previous practice.

ACOP, Chapter 8, Leasing: One RAB member stated that she thought the only thing that HACM could inspect was the stove, refrigerator, and smoke detectors. Also, why is the living room blind replaced for free, but if I want blinds in the bedroom, it costs me $20.

HACM Response: No, whether it is an HQS inspection or an Nspire inspection, the inspection covers much more than the "stove, refrigerator, and smoke detectors." There are templates for the inspections of what needs to be inspected, from walls to doors to windows to outlets to sinks, etc.

We are not clear on the fees you are quoting about blinds. We will check into this and get back to the RAB with a clear answer.

ACOP,Chapter 8, Leasing---Rents—I heard a rumor that rents are increasing. Is this true?

HACM Response: No, in public housing, rents are not increasing. They are generally set at 30% of adjusted income. In public housing, flat rents which are ceilings for higher income households are examined periodically to ensure they are appropriate in comparison to comparable unit rents in the market. But, we do not believe they have changed recently.

In RAD developments, the rent paid to the owner does increase, but the rent paid by the tenant is still 30% of adjusted income.

RAB Comments on HACM's draft 2025 Annual PHA Plan; draft 5-Year PHA Plan for 2025 to 2029; Admissions and Continued Occupancy Policy (ACOP); and Administrative Plan (Admin Plan)

ADMINISTATIVE PLAN

Administrative Plan, Chapter 4 , Applications: When you do a lottery, what happens to those applicants not selected?

HACM Response: They would receive a letter or email stating that they were not selected in the lottery. They would then need to reapply the next time that the waiting list is open.

Administrative Plan, Chapter 4, Applications: What is the normal waiting time for a unit in public housing or for a voucher?

HACM Response: There is no "normal" waiting time. The wait lists currently have thousands of applicants on them, which is why we recently closed the public housing and voucher wait lists as they were getting too large. The wait time depends on a lot of different factors: what is the resident turnover in a development; what is the bedroom size (HACM has fewer of some bedroom sizes; very large families in 4-6 bedroom units do not move frequently due to the small supply of units that large in the market; . It is difficult to tell how long someone can be on a wait list.

With the lottery in the HCV program, the general goal is that we will want to select a wait list size in the lottery that will fill our needs for about 2 years.

Other----HACM Board of Commissioners: How many members are on the Board of Commissioners? How many are residents? When will it be a full board?

HACM Response: There are 7 positions on the HACM Board of Commissioners. HUD requires one position of the seven to be filled by a resident and the state statutes require a 2nd position to also be filled by a resident.

Currently, there are 4 board members, although one of them is serving under an expired term and has been re-nominated by the Mayor. The Mayor has nominated three additional members as well that now need to go to the Common Council for approval. We anticipate approval of board members this fall, but the timing is up to the Mayor and Common Council and at this point we do not know if and when they will be approved.

TAB

C.2.
HUD-50077-SL
Certification by Local Official

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, **Cavalier Johnson** (*Official's Name*), the **Mayor of the City of Milwaukee** (*Official's Title*)

certify that the 5-Year PHA Plan for fiscal years **2025-2029** and/or Annual PHA Plan for fiscal year **2025** of the **Housing Authority of the City of Milwaukee** (*PHA Name*) is consistent with the

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Milwaukee
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The Annual PHA Plan for the Housing Authority of the City of Milwaukee (HACM) includes goals and activities that are consistent with the Consolidated Plan and the Analysis of Impediments, specifically as follows: 1) improving and sustaining affordable housing through the Choice Neighborhood Implementation grant in partnership with the City of Milwaukee, through use of mixed finance development and through participation in the HUD Rent Assistance Demonstration program (RAD); 2) providing housing for seniors and disabled individuals; 3) providing opportunities for low-income families to improve economic self-sufficiency through employment, training, education, financial literacy, asset-building, and homeownership programs.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:	Title:
Cavalier Johnson	**Mayor**
Signature:	Date: 7/29/2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

TAB

C.3. HUD-50077-ST-HCV-HP Certifications - Standard

Certifications of Compliance with PHA Plan and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 3/31/2024**

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the X *5-Year and/or* X *Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning* 2025 *, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
   (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
   (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
   (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
   - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
   - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;

- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Milwaukee — PHA Name

WI002 — PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 20**25**

X 5-Year PHA Plan for Fiscal Years 20**25** - 20**29**

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director	Name Board Chairman
Willie L. Hines, Jr.	**Sherri L. Daniels**
Signature: Willie L Hines Jr	Signature: Sherri L Daniels
Date: **7/26/2024**	Date: **7/26/2024**

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

TAB

C.4. Challenged Elements

PUBLIC HEARING COMMENTS ON 2025 ANNUAL PUBLIC HOUSING AUTHORITY (PHA) PLAN, 5-YEAR PHA PLAN FOR 2025 to 2029, ADMISSIONS AND CONTINUED OCCUPANCY PLAN, AND ADMINISTRATIVE PLAN—Comments Sorted by Topic

Topic #1-----Board Meeting Accessibility and Transparency:

Public Hearing Comment #1—From Roye "Chris" Logan, Mitchell Court:

Groups of residents have tried meeting with the Board of Commissioners at its public board meetings several times this year to explain complaints, but many of the meetings have been changed to virtual meetings or cancelled. The last in-person board meeting was in January 2024. In 2023, there were only two virtual meetings. We have wanted to provide our complaints in person to the Board; we have gone to the news; we have requested meetings at the housing developments. But, the Board has not responded to these requests. It is as if we are just poor people that can be ignored. What will you do to be more transparent and to establish better communication with HACM's residents?

Public Hearing Comment #2: From Vivian Jones, Lapham Park

We have been down here several times before, but until now have not been able to speak directly with you. Thank you for finally giving us the chance to speak. You have heard our concerns and the issues that we have had living in the HACM properties—they are nothing new to you. But, it has taken you over 365 days to come and see what is going on in the housing developments.

We are tired of living in place that is not fit to be living in, but yet we still have to have somewhere to live. We shouldn't be living in a place with rats and roaches and bedbugs. We shouldn't live in a place where people go around shaking on our doorknobs. We shouldn't live in a place where drugs are being sold in a building we are living at. We shouldn't be living in a place where security is no help to us. We've got security but they tell you, "I'm not allowed to get involved in that." A guy was robbed right on our front door of our building, a car was stolen, but they say they are not allowed to get involved in that. Why not? What is security good for? Nothing. Just like you guys—you sit here, you go home, you're comfortable. You don't have to worry about shaking bedbugs off of you. You don't have to worry about people knocking on your door at 3 or 4 in the morning. You say your job is to help us live better---you need to get up and do your job.

Public Hearing Comment #3: From Brittany Walker, Common Ground

I've had the pleasure of organizing some really spectacular people here in this room who are fighting for things they really shouldn't have to fight for. I'd like to ask just a few questions. I heard some things about your five-year plan and how you are willing to commit to certain things. Will you commit to having all your future meetings in person? Will you commit to having public comment at those meetings? Will you commit to reflecting those changes in the bylaws? Will you also commit to changing the definition of a quorum in the bylaws to a majority of seven, rather than a majority of appointed commissioners? In addition, while you say the board has toured some developments, we don't really believe the board has conducted a full tour of these developments? Will you allow residents to lead this tour so you're not just going in circles or touring vacant apartments with no real issues? Will you allow tenants who in many cases have lived there for multiple years to tour you around and show you where the actual problems are?

HACM Response on Topic #1 Board Meeting Accessibility and Transparency:

Over the past several months, the Board and HACM have received both directly and indirectly many complaints, concerns and requests for action. Additionally, board members have met with community groups, visited some of the HACM properties and have spoken with public housing experts. Board members are also open to doing visits at housing developments with attendance by resident leadership of that development as well. HACM leadership will also visit the developments regularly and meet with residents.

While the Board will occasionally need to have an option for a specific Board member to attend virtually from time to time due to their availability, the Board of Commissioners stated at the September 11, 2024 Board meeting that they are committed to have all Board meetings in-person moving forward.

Regarding public comments, Wisconsin Open Meeting laws give the public a right to attend and observe local government meetings but not a right to participate; a "public comment period" is allowed but is not required under Wisconsin Open Meeting laws. For several decades prior to the current members serving on the Board, the Board has not historically had as part of their agenda a regularly scheduled "public comment period." The one exception is when HACM has scheduled a public hearing on a specific policy change or action, such as annually regarding the PHA Plan or on other significant amendments to plans or policies, when HACM is soliciting input from residents and other members of the public.

However, the Board of Commissioners are in favor of implementing a public comment period, and has requested HACM leadership to begin to research the feasibility of having public comment periods as a regular agenda item as well as best practices on how to implement it to ensure compliance with open meeting laws, agenda items, discussion of specific items not on the agenda, time for comments, etc.

Regarding the quorum, changing the bylaws related to quorum is not a simple decision that does not have other consequences. The potential challenge in changing the definition of quorum to a "majority of seven" is that if commissioners leave the board or if there is a gap period in appointments of new members so that there are fewer members on the board, it could create the condition that no business could be transacted for several months until the Mayor has appointed and Common Council approves new members. This would include action items that are necessary for housing authority operations such as contract approvals, HUD requirements, necessary policy changes, etc.

****

Topic #2: Accountability and Performance Reviews

Public Hearing Comment #4: From Roye "Chris" Logan, Mitchell Court

HACM's biggest issue is bad management, from the top down. We have raised important concerns and complaints about the behavior or background of a number of senior management staff at HACM, but the Board has not held them accountable. When there have been issues, HACM has moved managers around from one development to another. The entire staff culture is rotten. The 5-Year Plan has nothing about how the Board is going to hold staff accountable for doing their jobs and treating residents respectfully. Our question is how will the Board hold HACM leadership accountable? Will you commit to performing performance reviews the Executive Director, Willie Hines, as a good board will do, and will you publicly share the results? Will you mandate that Mr. Hines perform performance reviews of his senior leadership team?

Public Hearing Comment #5: From Betty Newton, Becher Court

You say you are holding the HACM staff accountable? Are you holding the Executive Director accountable? Because you gave him a raise. With all of the bad things happening in HACM buildings, you gave him a raise, even though he makes more than the Governor and the Mayor. Why does he deserve a raise when he won't even come and meet us. I have invited him to my building several times. Never called me to have a conversation though I have given him my

numbers. If you ignore the RO Presidents, you definitely ignore the residents. We're not going to attack you; not physically.

Public Hearing Comment #6: From Kevin Solomon, Common Ground

We want to have Mr. Hines speak as it says on the agenda and that you, the Board, demonstrate that you hold staff accountable right here, right now by asking him hard questions.

Number 1--HUD and Baker Tilley said they could not determine the financial net position of the Housing Authority. You don't even know the status of your own books. There's three million dollars missing. There's a thousand plus illegal self-payments. You claim you're poor but you can't even figure out your net position. So that excuse frankly feels vapid.

Number 2—I'm more concerned that you had no questions for Mr. Hines. One Board member asked no questions this entire board meeting. Another isn't even here. Another one—who knows if she's here and how many meetings has she missed now. No transparency, no justification given. You don't have any questions for Mr. Hines? Can you ask him now? We're here, we're waiting. The problem is that you talk to him behind closed doors and you cancel meetings. You talk about dialog but you don't do it. One helpful thing would be if you talk to him publicly and not behind closed doors. You're not doing your job. We're glad you're going to do a performance review—you didn't say when. We're glad you're going to hold him accountable—you didn't say how you were going to do that. That's the result of our pressure for two years. But you haven't demonstrated it here.

HACM Response on Topic #2 Accountability and Performance Reviews

To address the concerns that the Board is hearing from residents, the public, and through media outlets, the Board has challenged HACM leadership to take action, to investigate issues or concerns, to hold their teams accountable, and above all to strive to provide safe, clean and welcoming environments for residents.

As many are aware, HACM has been put on corrective action plans by the U.S. Department of Housing and Urban Development due to financial and accountability issues. The Board has requested that HACM leadership have as their top priority to get back on track by implementing corrective actions. The corrective action plans, which also includes the requirement to contract with an experienced agency to operate our Section 8 voucher program and a forensic audit to do a 100% review of all HCV financial transactions for five years from 2017 to 2022, are a significant focus in both the Annual PHA Plan and the Five-Year PHA Plan.

HACM is committed to transparency in our communications with internal and external stakeholders. HACM expects that departmental personnel and HACM leadership respond promptly to inquiries received generally or through the public records request process. Additionally, HACM utilizes a variety of communication channels, such as websites, email, social media, digital signage, tours, meetings, and newsletters to share information about the agency's operations. Our goal is to keep stakeholders informed and engaged in our efforts to advance HACM's mission.

Additionally, the Board will be implementing more intensive board oversight, via asking questions, requesting additional information, and digging into the details of frequent concerns from residents and the public.

At the September 11, 2024 public hearing, the Vice-Chair of the Board of Commissioners confirmed that the Board will conduct performance appraisals of current HACM leadership. Under the Wisconsin Open Meetings Law, one of the exceptions to open meetings is that closed sessions are authorized for certain specific employment issues for "considering employment, promotion, compensation or performance evaluation data of any public employee over which the governmental body has jurisdiction or exercises responsibility." While the actual performance review will be done in a closed session similar to those done by other public bodies (such as the Fire and Police Commission or other public bodies in the state), the HACM Board of Commissioners is committed to having the entire board participate in performance evaluations of the Secretary-Executive Director. In addition, the Board has committed to be transparent with their findings and recommended actions.

While the exact format has changed over the years, HACM has performed performance management evaluations of each staff by their supervisor(s), evaluating against accountability goals and standards that were established at the beginning of the year.
In the current 5-Year PHA Plan for 2025 to 2029, HACM has included a specific objective (f) regarding performance management under "Goal 1: Optimize HACM's organization structure, processes, and procedures to attain resiliency and long-term sustainability."

Objective (f) under Goal 1 covers accountability goals and performance management. It currently reads as follows:

> "(f) HACM's Performance Management System, supervisors annually review and revise to ensure clear accountability goals and standards have been established that are integrated into every employee's performance management review."

In the 5-Year Plan, we will clarify further by adding the following sentence to Goal 1, Objective (f): "The HACM Board of Commissioners will perform similar performance management review(s) of the Secretary-Executive Director."

****

Topic #3---Accessibility

Public Hearing Comment #7: From Marion Moore, College Court

A resident at College Court complained about accessibility in our buildings for persons with mobility disabilities. She noted that the doors are not wide enough and that she has to turn her stove sideways so she can enter the kitchen. How come your plan does not take into account reasonable accommodations such as this?

Public Hearing Comment #8: From Barbara Leigh, County Commission for Persons with Disabilities

I serve on the County Commission for Persons with Disabilities and also have experience with HACM . Our theater company worked with residents at Lapham Park creating original theater, music and dance. The residents were wonderfully talented people and I enjoyed working with them. This was about eight years ago. I'm just so saddened by what seems to have disintegrated. Lapham Park was a model agency, a beautiful place. It now seems to be falling apart.

I'm the Chair of the Housing Access Committee. I really have concerns about the number of people that HACM serves that have a disability—some very major and some more minor, but definitely a disability. I think it would be so important to have someone on your Board, for example, who has a disability, maybe in addition to being a resident. They would have that personal contact and could go into these apartments and make sure they are accessible. I can testify that many a restaurant, many a public place that say they are accessible are not; there have been many times in such businesses that I have had difficulty getting into a bathroom without major embarrassment. So, please, take that into consideration.

HACM Response on Topic #3 Accessibility:

Residents with disabilities are valued members of our communities. HACM will work with residents to provide reasonable accommodations when needed. All residents can complete a request for reasonable accommodation (also called a Section 504 Reasonable Accommodation), and HACM will review it for consideration and action within federal guidelines.
Currently, HACM has a limited number of accessible units in our Public Housing portfolio due to its aging housing stock. Most of our public housing developments were built between 1937 and the early 1970s, and so are between 50 to 87 years old and the vast majority of these public housing units do not meet accessibility standards.

HACM has renovated a number of our older public housing developments into project-based voucher units through HUD's Rental Assistance Demonstration (RAD) program. These renovations have included more accessible units as part of the overall development renovation, in accordance with the requirements Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act when applicable. Via RAD conversions and the low income housing tax credit (LIHTC) and other funding that may be applied for, HACM is able to provide more accessible units as a required part of the renovations.

To deal with the concern that there are very few accessible units in public housing, in the Administrative Plan revisions that came into effect in early 2023, HACM included the following provision on page 18-33:

> In addition, the PHA may place households that are referred by the PHA's public housing program onto the PBV wait list for a PHA-owned property (e.g., building converted to PBV through the RAD program) if the public housing household has requested and been approved for a reasonable accommodation that either (a) cannot be fulfilled in the public housing program or (2) cannot be fulfilled in a timely manner in the public housing program.
>
> Examples include, but are not limited to these types of circumstances: (a) a resident in public housing requires an accessible unit and no accessible units are available in the public housing program or are available timely; and (b) there is a need for a 2 bedroom unit for a live-in aide, but all units in the public housing program are either 1-bedroom or not accessible.

This change meant that now if a public housing resident who submits a 504 reasonable accommodation request cannot be accommodated in public housing, they may be referred to a Project-Based Voucher unit in a PHA-owned property (such as a building converted to project-based vouchers via RAD) by being placed on a wait list for a unit that meets their approved needs.

Topic #4—Public Address System

Public Hearing Comment #9: From Minister William Harrell, Lapham Park

Why can't Lapham Park Resident Organization use the intercoms to make important announcements to residents, including RO meetings, meal programs, food truck and food distribution, arts & crafts activities, etc.?

HACM Response on Topic #4 Public Address Systems:

In the past, the PA system had been used by a number of buildings for building-wide announcements. However, housing management was informed by our systems professionals several years ago that the current PA systems installed many years ago were not intended for non-emergency use. Rather, they were designed to be used for the building's fire system and other emergencies. The use for other non-emergency purposes such as regular event announcements was wearing out the system prematurely as it was not designed to be used for those purposes. Thus, all HACM housing development staff were informed two to three years ago to restrict building-wide announcements to emergency use only.

However, HACM will continue to evaluate options and costs to see it could be feasible at some point in the future to replace the system for one that could incorporate other periodic announcements.

****

Topic #5--Resident Members of the Board of Commissioners

Public Hearing Comment #10: From Minister William Harrell, Lapham Park

The Board does not have enough Board members right now, but there are a lot of interested residents here. Is it possible to put more residents on the Board of Commissioners, and not the RAB Board which is useless, so that residents can give some input on what is going on and perhaps this would eliminate some of the problems HACM is currently experiencing.

Public Hearing Comment #11: From Betty Newton, Becher Court

Our resident board. I've heard there are supposed to be two residents on the board of Commissioners. Currently for the last three to four years, you've only had one, and I'm questioning if you have that one. I've asked previously whether the current resident on the Board is physically able to fulfill her duties. You came to my building with the Mayor on June 17th, unannounced. You didn't come looking for me—you found me because my residents informed me you were there. It wasn't with the Chair, Ms. Daniels, it was with you, the Vice-Chair, the Vice Chair whose term had expired already. There are supposed to be residents on this Board, then I want to see them and I want to see them doing their job.

HACM Response to Topic #5 Resident Members of the Board of Commissioners:

HACM currently has one of the two seats allotted for residents filled. The other seat became vacant in August 2023, just over one year ago, when that resident, who was also Chair of the Board, passed away. Mayor Johnson has appointed another resident to be a Commissioner, and HACM looks forward to the Common Council confirming the appointment, filling the second resident position on the Board. Chair Sherri L. Daniels is a long-time HACM resident and member of the HACM Board of Commissioners. She is currently stepping back from running the HACM Board Meetings for medical reasons, and while she is not running the meetings, she remains committed to serving her fellow residents as a member of the Board.

The Resident Advisory Board (RAB) is not only HUD-required, but is a proven tool for resident input into plans and policies such as the PHA Annual Plan, Admissions and Continued Occupancy Policy and Administrative Plan, where changes have been made based on input from the RAB.

****

Topic #6—City of Milwaukee Funding for Maintenance Custodial Positions

Public Comment #12: From Franz Meyer

In your 5-year PHA Plan, you state that HACM has hired only 3 of the 5 positions with the $250,000 in funding that the City of Milwaukee awarded to you earlier this year? Only 3 of 5 in a year? Is that acceptable to the Board? What is the timeline for hiring the remainder of the positions? I hope that the Board considers how taxpayers feel when you have not made full and immediate use of money that was awarded to assist HACM with keeping the buildings clean.

HACM Response to Topic #6 City of Milwaukee Funding for Maintenance Custodial Positions:

All five of these custodial positions are currently filled, though staffing levels have fluctuated over the past year. HACM tends to see higher turnover in our lower-wage, entry-level positions like these. The Human Resources team has responded promptly to vacancies and will continue to do so as needed.

****

Topic #7---Pest Control

Public Hearing Comment #13: From Vivian Jones, Lapham Park

We are tired of living in place that is not fit to be living in, but yet we still have to have somewhere to live. We shouldn't be living in a place with rats and roaches and bedbugs. You don't have to worry about shaking bedbugs off you.

Public Hearing Comment #14: From Gidget Aranda, Becher Court

We still have bedbugs, drain flies and rats crawling around our building. When we complain about bedbugs, we wind up getting evicted. We want to follow up with Director Hines to see how this will all be resolved.

Public Hearing Comment #15: From Carmella Holloway, College Court

The bedbugs at College Court are terrible. I shouldn't be paying rent if I'm in an uninhabitable apartment full of bedbugs. Crawling in my ear; crawling all over me; crawling on the walls and the floors I haven't had a decent night of sleep in six months. You go home and have a nice sleep—why can't I have one? I'm human just like you are, but you don't care. They sprayed five time. Watered down-I don't smell nothing. You aren't doing anything. Why should I have to pay rent where I can't lay my head? But yet Willie Hines does nothing about it.

Public Hearing Comment #16: From Kelly Barnes, Hillside Terrace

We also have problems with the rat problem. We have to come in the house before 8 because the rats are so bad. They are not even scared of you. I sent a video showing how close they come to you.

Public Hearing Comment #17: From Charlene Bell, College Court

You might have seen me in the Washington Post article or in the news. I'm a true fighter. If I get pissed off about something, I'm not going to give up. I'm going to keep fighting for true justice. I'm being eaten by bedbugs daily—I have a fresh bedbug bite now. I have my apartment sprayed once a month for the last year and a half and there is still bugs in my house. I spent $100 on bed covers.

Public Hearing Comment #18: From Cornelius Sawyer, Highland Gardens

We keep talking about bedbug. We brought up the fact that every other organization that has employees, even Spectrum, that goes from house to house, put footies on their feet so they won't transfer any pests, especially when they are going from apartment to apartment doing inspections or work orders.

HACM Response to Topic #7 Pest Control:

Pest control is a top priority, both for the well-being of our residents and for the care of our properties. HACM manages pest control through in-house staff who can most efficiently and cost-effectively provide services. HACM also has a purchase order with a third-party vendor to provide secondary pest control services, when necessary.

Services include regular monitoring and treatment of properties and specific pest remediation when reported by residents and staff.

Effective pest control requires a partnership with residents, who play a lead role in proper disposal of trash, upkeep of housing units, and preparation of units for pest control treatment. Early identification and reporting of pests by residents to management is extremely important—if HACM does not know of a pest problem, it may not be found until it is time for a unit inspection.

Once reported, managers will put in a work order for service. Pest control staff will schedule the service and/or inspection and will complete the service. Residents assist in the treatment by preparing for the pest control service. Pest control also determines whether further services are needed or not.

Pest control actively goes to certain exterior areas where a number of complaints from rats have been reported, including Lapham Park, Townhomes at Carver Park, Hillside Terrace, among others. This typically happens weekly, and staff walk the grounds and treat for rats. Residents

can do their part for exterior pests by not throwing garbage on the ground, by putting garbage in plastic garbage bags, putting the bags in the appropriate garbage can or dumpster (depending on the site), and fully closing the lid.

Pest control chemicals have been formulated and improved over the years with the intention to avoid strong odors and staining, also to be safer for pets and people. Some chemicals come in a powered form to be used in a sprayer, so water has to be added in accordance with the instructions by the manufacturer. HACM does not "water down" the chemicals as that would make the entire process ineffective.

There is not conclusive evidence that booties work in reducing spread of bedbugs and it is not currently considered the industry standard to employ them. Bed bugs do not jump; you would have to sit or lean against walls/furniture to get them on your clothes in order to take them to another unit. They can also pose slip hazards. HACM requires maintenance staff to wear slip-proof work shoes to avoid accidents. Roaches don't interact with people and the egg casings are typically in/near their hiding spots, things that make it less likely to transport them from unit to unit. Our techs are trained in pest control and they know how to avoid transferring pests. Other professionals that specialize in cable installation or gas meter installation would not have the same awareness and knowledge.

HACM is committed to continue to work in partnership with our residents and pest control services to keep pests out of our housing.

****

Topic #8 –Safety

Public Hearing Comment #19: From Vivian Jones, Lapham Park

We shouldn't live in a place where people go around shaking on our doorknobs. We shouldn't live in a place where drugs are being sold in a building we are living at. We shouldn't be living in a place where security is no help to us. We've got security but they tell you, "I'm not allowed to get involved in that." A guy was robbed right on our front door of our building, a car was stolen, but they say they are not allowed to get involved in that. Why not? What is security good for? Nothing. You don't have to worry about people knocking on your door at 3 or 4 in the morning. You say your job is to help us live better---you need to get up and do your job.

Public Hearing Comment #20: From Gidget Aranda, Becher Court

My property was stolen in front of my apartment. I made a report to public safety. I called the next day to follow up and they didn't know what I was talking about. There are two cameras in the hallway, so why are they not following up on this? We do not feel safe.

Public Hearing Comment #21: From Kelly Barnes, Hillside Terrace

I have to be careful sending children to the basement because homeless people are either down there or down there doing drugs. That's scary to me coming into my apartment building with my grandkids not knowing what to expect. I feel if we complain or if we are asked to go on the news, I would be totally honest. But you are not being honest. How can you say what is going on in our apartment or apartment complex if you never even came there to look? I just want you to understand what we are going through each and every day.

Public Hearing Comment #22: From Kesha Tate, Hillside Terrace

The residents of Hillside are having problems with the rats, prostitution, the homeless people, and the trash. My kids are not able to go outside due to the fact that the homeless people are out sleeping on the playground or by the trash. They are breaking into our apartments going to the basements to sleep. They are also coming there to buy drugs. I complained about another resident having her boyfriend there selling to them. And nothing has been done, even though he is also on the no trespass list so he shouldn't even be there. The rats are attacking residents. My kids are afraid to go outside due to the drugs, the homeless. Why should I pay to live somewhere where they can't be comfortable and they can't live well? I complained about my neighbor's boyfriend selling and they're trying to break into our units and stuff. We shouldn't have to worry about that.

Public Hearing Comment #23: From Betty Newton, Becher Court

I have asked the Chief of Public Safety multiple times to give us a list of the cameras in our building –the ones that work and the ones that do not work because I get sick of hearing that something was not caught on camera. They stole a fan out of our laundry room. I told them the date that it happened, but they could never come back and tell me who stole it. They stole a table and chairs out of our lobby by two exit doors. They never told us who stole it. And I've asked repeatedly. You can't tell me you don't put a camera by two exit and entrance doors.

HACM Response to Topic #8 Safety:

Across all HACM developments and properties, HACM acknowledges the concerns regarding security presence, response times, and the handling of incidents such as thefts and loitering. HACM's Public Safety is committed to addressing these issues to ensure a safer and more secure living environment for all residents.

Your concerns about individuals gaining unauthorized access to buildings, unescorted guests, or illegal activities occurring in or around our developments are serious matters that our team is actively working to address.

Our Public Safety Specialists have specific roles and responsibilities to resolve safety issues and assist residents. However, HACM's Public Safety's direct intervention may be limited in dangerous situations or emergencies, as we are not the police, do not have arrest powers, and do not carry a gun or weapon. In an emergency, please call 911 immediately. If it is a non-emergency, you can call Public Safety at (414) 286-5100 or you can call the Milwaukee Police Department non-emergency number at (414) 933-4444.

We recognize the importance of timely and effective communication between Public Safety and the residents. Our team is committed to maintaining open lines of communication, ensuring that reports are accurately tracked, incidents are thoroughly investigated, and residents are kept informed of the status of their reports. Public safety staff often attend resident organization meetings when possible, to provide information regarding crime or safety, or answer questions.

Regarding the concerns about the functionality of cameras at all developments, including Becher Court, we are in the process of updating and expanding our camera systems to ensure optimal coverage and to minimize blind spots. We are also coordinating with our IT department to ensure all current camera systems are operational and positioned to effectively monitor key areas such as exits, entrances, and common spaces. We have recently implemented a regular review of cameras in each development at least once a week to identify ones that may be down for a connection reason or that need replacing. At the time it is identified, a work ticket is put in to our Information Technology department that the camera or connection is not functioning. Additionally, we are seeking creative ways to fund improvements such as new cameras or replacements of older cameras to ensure the safety and security of all residents. In the Capital Fund Program -Five Year Action Plan amendment, additional line items were included for security cameras.

We are actively collaborating with HACM Maintenance Services and other relevant departments to address issues like unauthorized individuals accessing buildings and the cleanliness of common areas. We are also coordinating efforts with the Milwaukee Police Department to enhance patrols and interventions where needed.

We have a robust records management system in place that ensures all reports are accurately logged, and there is a clear expectation that residents are informed of the actions taken when Public Safety responds to calls for service. We ensure accountability by making sure follow-up actions are communicated quickly to the residents involved

We also encourage you to review the objectives that are included in the Five Year PHA Plan for 2025 to 2029 under Goal #4 regarding Safety and Security. These incorporate some of the major strategies we have been implementing over the past two years.

We understand that safety is not only about having security personnel or cameras—it's about making sure those resources are effective and that residents can trust the process. HACM Public Safety Department takes concerns seriously, and we are committed to making the necessary improvements to enhance security across all developments, acting in partnership with the community.

****

Topic #9—Access to Amenities

Public Hearing Comment #24: Gidget Aranda, Becher Court

At Becher Court, we still have no access to the kitchen and they still have old nonfunctioning gym equipment. At Becher Court, we still have washing machines that destroy our clothes, or are filled with water. There are 4 washers for 120 units. Why does it take over a month to address this?

HACM Response to Topic #9 Access to Amenities:

For a number of developments, HACM leases the washing machine and dryer service from a local business that works with many multifamily housing developments across Milwaukee, and they maintain and service the machines. The Becher Court property manager has called several times regarding the problems with the one washing machine. She has now called to request replacement of the machine and has unplugged the machine and put an "out of order" sign on it in the meantime. She has also asked them to process the refund to the resident that had clothes damaged.

Residents of Becher Court have access to the amenities of the adjoining Becher Terrace senior living community, which is not owned or operated by the Housing Authority of the City of Milwaukee. To use Becher Terrace's kitchen, Becher Court residents just need ask the Becher Terrace management office. The management of Becher Terrace have stated they will not be replacing the equipment in the exercise room at this time.

****

Topic #10—Work Orders

Public Hearing Comment #25: From Gidget Aranda, Becher Court

At Becher Court, we still have systematic plumbing issues throughout the building.

HACM Response: Becher Court does not have systemic plumbing issues throughout the building. Gidget Aranda contacted the management office at Becher Court on September 27, 2024 to report a clog. It appeared that Ms. Aranda had someone try to unclog her sink and a pipe was broken in the process. HACM's maintenance staff fixed the clog and broken pipe on October 1, 2024.

Public Hearing Comment #26: From Kelly Barnes, Hillside Terrace

My main issue is my grandchildren. They go outside and they can seriously get hurt. There is a steel pipe just hanging from the ground. I have told them numerous times and nothing has been done. The jungle gym that they play on is dangerous because bars are loose on there.

HACM Response: HACM is in the process of identifying and contracting with a vendor to complete the removal of the playground equipment at issue.

Public Hearing Comment #27: From Kesha Tate, Hillside Terrace

Numerous times I've called in work orders for stuff to get done but nothing is getting done. I have to fix stuff myself so my kids won't get hurt. My kids got locked in the bathroom. I put in a work order two months ago—nothing has been done. I've complained about the carpet and my refrigerator. They had to come inspect it to see if I was lying. It got done but still I should not have to constantly call you to put in the same thing over and over again just to get something done. My kids come first.

HACM Response: There is a record of nine maintenance requests for this unit between January 1, 2024, and October 1, 2024. Each work order was completed within the required timeframes

set forth by HACM's funders (24 hours for emergency, 3 days for routine work), with the exception of one item which appears to have been overlooked by staff. Work order #179637 (replace light) was entered on July 22, 2024 and had not been completed as of October 2, 2024. This has been given to the Hillside Terrace manager for immediate action.

Work orders are prioritized based on severity and age. Emergencies take first priority, and all other work orders should be completed on a first-come first-served basis. Flooring replacements, while important, are a budget-restricted item. There are finite resources to make improvements to our units each year, and when those resources are depleted, some improvements must be deferred until the next budget cycle.

Public Hearing Comment #28: From Charlene Bell, College Court

I told them all about my issues—about the mice coming out of the hole in the wall and that I almost broke my neck falling off the toilet. It did not get taken care of until the new manager came to the building. He showed me there was a note that the problem had previously been fixed. I told him that you see these pictures of the hole in my wall-does it look like it's fixed? They put mousetraps in my house to catch mice and I said I'm afraid of those mice, why are you putting these traps in my house? You're not fixing the problem, you're putting a bandaid on it.

HACM Response: There have been no records of mice in this unit. A work order regarding baseboard tile in the bathroom was submitted on April 16, 2024. On July 12, 2024, the new College Court manager had a conversation with Ms. Bell where she expressed concern that mice could enter the bathroom through a missing ceramic baseboard tile. At this time, the manager became aware the April work order had never been fully completed. On July 15, 2024, the work in Ms. Bell's bathroom was completed and her concern was resolved. HACM continues to encourage all residents to report any concerns to the management office.

****

Topic # 11--Inspections

Public Hearing Comment #29: From Brenda Lawrence-Gillum, Common Ground

In your 5-Year plan, you state that HACM will ensure appropriate documentation of inspections for the voucher program. Your 2022 audit found that 10% of voucher properties hadn't been inspected in 24 months and 40% of the inspections were overdue. Once they happen, most of the inspections are quick, check the box type inspections and don't really look at the real conditions. How will you ensure that the inspections happen and are done properly? How will you, as the Board, check the progress and quality of the inspections?

Public Hearing Comment #30: From Bonnie Cooper, Hillside Terrace

You're saying that you're holding HACM accountable but they're walking in and out of our unit without letting us know. I've put up a sign to let them know that this is a privacy law that you cannot come in our unit whenever you decide to.

HACM Response to Topic #11 Inspections:

At the time of the HUD site monitoring review in 2022, there were a number of contributing factors for both the actual number of late inspections and that caused the HUD PIC system to show inspections as late. One of these had to do with how inspections were recorded by HACM into HUD's PIC system. Rather than recording a separate action in the HUD PIC system when an inspection was completed, HACM held it and recorded it when the recertification was complete. If a recertification was late, that inflated the number of late inspections. HACM has made progress in reducing the number of late inspections. In August 2024, YARDI's Late Recertification report showed a total of only 82 late inspections at that time.

While Public housing nationwide has adopted NSPIRE standards as the new type of inspection standard, HUD has delayed the transition from the current standard (Housing Quality Standards or HQS) to NSPIRE. The new transition date is 10/1/2025.

Both HQS and NSPIRE have standards that need to be reviewed as part of the inspection. HUD recently developed NSPIRE so that all housing programs were using a similar standard. The NSPIRE standards and the definition of deficiency is more clearly defined in NSPIRE, so that an inspector knows exactly what a deficiency is (looking at the size of a hole in the wall, for example, to determine whether it is a deficiency or is not a deficiency, and if it is, what type of severity).

In addition, in the voucher program, HACM performs Quality Control Reviews of a sample of inspections by a supervisor or by another qualified person other than the person that originally did the work. The supervisor would go out and do a re-review of the inspection findings. This is part of the SEMAP quality control testing. If the reviewer finds errors or issues with the inspection, they correct the inspection to show items that should have been failed or should not have been failed. They also follow up with the original inspector to provide additional training and explain the errors.

An additional area of quality control testing takes a sample of inspections that failed to test whether the item was appropriately enforced by HACM—was the deficiency corrected by the applicable deadline based on HUD regulations and PHA policy and if not, were other steps taken to abate the Housing Assistance Payment to the landlord and/or issue a voucher to move to another location in accordance with PHA policy.

Regarding notice and whether a resident needs to be present during an inspection/work order, the policies for both public housing and the voucher program are as follows:

Public Housing (Per Chapter 8 of HACM's Admissions and Continued Occupancy Policy):

- HACM's general policy is that we provide at least 48 hours prior to any non-emergency inspection. For regular annual inspections in public housing, the PHA will attempt to provide the family with one-week written notice of the inspection to allow the family to prepare the unit for the inspection.

- Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the Public Housing Authority to enter the unit.

- While the resident is required to be present for move-in inspections, the resident is not required to be present for the inspection. The resident may attend the inspection if they wish.

- For all inspections in public housing: If no one is at home, the inspector will enter the unit, conduct the inspection and leave a copy of the inspection report in the unit.

Voucher program (Per Chapter 8 of HACM's Administrative Plan):

- Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life-threatening emergency, reasonable notice is considered to be not less than 48 hours. Inspections may be scheduled between 8:00 a.m. and 7:00 p.m. Generally, inspections will be conducted on business days only. In the case of a life-threatening emergency, the PHA will give as much notice as possible, given the nature of the emergency.

- When a family occupies the unit at the time of inspection an authorized adult must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

- At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted but is not required.

If staff have not followed these procedures, a resident or participant can submit a complaint with the Property Management Office or with the Voucher program, whichever is applicable.

****

Topic #12—Evictions

Public Hearing Comment #31: From Barb Valley, Lincoln Court

A resident at Lincoln Court mentioned that recently there have been residents that were evicted for reasons, but they keep coming back to the building. Some of them were violent. One fellow poured gasoline around the building as he wanted to get rid of bedbugs. It took 6-8 weeks for him to get evicted. Another resident was beating up residents for no reason. It took over a month for her to get evicted and out of the building. Why does this take so long?

Public Hearing Comment #32: From Sandra Eagle, College Court

In November 2023, my car got vandalized three times in two weeks. Management did nothing. The person that did it lived right next door to me. (note to ken—she lived in 415 and he lived in 412—the person was Aaron Turner). In January 2024, most of the residents suspected him. Later

in January, he admitted to me he did it. What are you going to do about it---Nothing. Where is the problem? He got evicted finally in March 2024.

HACM Response to Topic #12 Evictions:

Determinations on when and whether to evict a tenant because of conduct issues are made on a case-by-case basis depending on the individual circumstances involved. It may also include evaluation of the actual evidence that is available to support eviction due to conduct.

As a general matter, residents facing potential eviction because of conduct issues are provided with a 5, 14, or 30-day notice to vacate depending on the underlying reason(s) leading to the eviction. These notices are sometimes curable, meaning the tenant can stay if they correct their actions, and sometimes not curable, again depending on the individual circumstances.
In the event that a notice is not or cannot be cured and the tenant has not vacated the premises voluntarily by the end of the notice period, an eviction action must be brought in Milwaukee County Circuit Court to evict them. After an eviction case is filed, an initial court appearance takes place no more than 25 days after the date of filing the case. If the tenant does not appear and/or there are no disputes related to the eviction, a judge can grant a default judgment in favor of HACM and grant a writ of restitution, which provides that the Sherriff's Department will assist with removing the defendant from the premises within the next 10 days.

In the event a tenant appears at the first hearing and/or there are potential factual issues raised, the court may set a date for a contested hearing to take place up to 30 days after the initial hearing. This second hearing is often further adjourned by the court to allow a defendant to seek legal counsel or to allow recently-retained legal counsel to become familiar with a case.

In the event judgment is entered in favor of HACM in contested eviction cases at one of these subsequent hearing dates, the court grants judgment in favor of HACM and issues a writ, but the court has the discretion to stay the writ for up to another 30 days. Thereafter, the Sherriff has up to 10 days to act on the writ.

In sum, while sometimes fairly quick, some contested evictions resulting from conduct issues can last for multiple months before someone is removed from the property because of the court processes involved.

****

Topic #13--Communications

Public Hearing Comment #33: From Barb Valley, Lincoln Court

I emailed Mr. Hines about a year and a half ago and during our meeting at my building, you said you wanted to check into the details so you could get a complete answer and that you would not forget about me. You forgot about me-- I never heard back.

HACM Response to Topic #13 Communications:

Mr. Hines remembers the meeting he had with Ms. Valley after he had received a letter from her. He believed that the meeting ended with the understanding that the issues discussed had been explained/addressed and no further action was needed.

Since Ms. Valley states that answers are still outstanding, Mr. Hines will provide a full response to the issues raised in her letter.

****

Topic #14—Social Workers and Lutheran Social Services

Public Hearing Comment #34: From Sandra Eagle, College Court

Four years ago, I think you used to have a number of social workers. Instead of getting more, you eliminated them and only have Lutheran Social Services taking care of thousands of people. It took me two weeks to get ahold of Lutheran Social Services, and then it took another two weeks to get an appointment. So then the problem does not get solved, and then management says that, well, "it's your problem—it's not social services problem. " You've got to take care of this issue.

HACM Response to Topic #14 Social Workers and Lutheran Social Services:

Since the 1990s, HACM has had only one social worker on staff, with a significant part of their job responsibilities being to coordinate with and provide technical assistance to the resident organizations and attend resident meetings. While some referrals for social services were done by the HACM social worker, most of the residents referred were assisted by SET Ministry.

At the same time, beginning in 1995, a nonprofit organization named SET Ministry received a grant to develop a service coordination/case management program for seniors and persons with disabilities in public housing, beginning in Lapham Park and then expanding to other public housing

highrise developments. Part of the funding for these services came from a small amount of funding that HUD had included in the operating subsidy for some housing authorities and part came from SET Ministry applying for competitive grants with HUD to fund the services. SET was very successful at that time in applying for competitive grants which funded a number of social workers working across thirteen highrises.

SET Ministry merged with Interfaith Older Adult Services in 2019 to form UNISON. In 2019, the newly-formed UNISON announced they were closing down operations. HACM was able to find another organization with experience in service coordination to take over services—Lutheran Social Services of Wisconsin and Upper Michigan, Inc. (LSS).

Since 2019, the number of service coordinators has dropped, in part due to limited funding. As the ROSS grants that were remaining at the time of the transition from SET Ministry had been expended, the number of social workers decreased as well. Additionally, until recently, ROSS grants were limited and could not be used to fund RAD developments. Due to the decrease in available funds, Lutheran Social Services of Wisconsin and Upper Michigan currently has two social workers that perform service coordination in highrise developments. Due to the fact that they are serving a number of developments, LSS office hours are limited in each building.

As was stated earlier, for many years, HACM only had one certified social worker who juggled responsibilities related to resident organization technical assistance with actual referrals for service. In 2023, when the social worker resigned, HACM made the determination that it would be more efficient to form a Resident Liaison section that could both provide that technical assistance and communication with resident organizations, as well as provide coordination of services and assistance to residents who need it. Referrals are made to the service coordinators (Lutheran Social Services staff) when a licensed social workers is truly needed. Resident Liaison staff can also assist when residents are having difficulties with communication with managers, or in reviewing or understanding their rent ledgers.

HACM continues to work with LSS to identify and apply for funding to fund service coordination. In addition, we are also looking for any additional partners that have resources and can assist in providing various services in our developments. Later this year, we plan to issue a Request for Proposal for Service Coordination services for 2025.

****

Topic #15: Garbage

Public Hearing Comment #35: From Bonnie Cooper, Hillside Terrace

I want to know in this Five Year Plan when is the timetable to get our building rehabbed or fixed, because our boiler is so old it's causing fire. Our basement is filled with garbage cans that are so dirty that when you go down there to do laundry, they have gone to the hospital due to what they are ingesting from the dirty garbage cans. They are not being disinfected. We took the Resident Liaison down there and still nothing has been fixed. People look at the outside of the building at Hillside, but they never go in the middle and see the rats, the roaches, the garbage cans. There are so many units and there's like 5 garbage cans for like 10 units. That's not acceptable and that's not enough, so where are people supposed to put the garbage. We have asked for more garbage cans for the development. Without them, people will put garbage on the ground which feeds the rats.

HACM Response to Topic #15 Garbage:

Although it was difficult to tell at first due to the amount of smoke, the fire was not from the boiler in the basement of the Hillside highrise. The fire was caused by a pile of leaves just outside the building that someone had started on fire and the smoke was drawn into the building through an air vent.

However, the boiler is getting older. Currently, the proposed amendment to the Capital Fund Program-Five Year Action Plan for 2023 to 2027 includes a line item for calendar 2025 for Hillside Terrace for heating and ventilation equipment as follows:

> HVAC replacement thoughout Hillside Development, including 2 new water heaters, 6 boilers for the family developments, 4 heating units at the highrise, and 3 air conditioning units at the highrise, for approximately $500,000

The rolling garbage dumpsters that are in the basement of the Hillside highrise are also older equipment. We will try to clean them once or twice a year with a pressure washer. If persons use garbage bags for their garbage disposal, it will help to decrease any contamination of the inside of the dumpster.

HACM has had discussions with the Department of Public Works (DPW) about additional garbage cans for Hillside Terrace. They had previously provided an additional 90 garbage carts, and HACM continues to work with DPW to see if we can obtain more We also have explored use of larger dumpsters outside, but that would not be feasible with the current infrastructure at Hillside.

Pest control actively goes to certain exterior areas where a number of complaints from rats have been reported, including Lapham Park, Townhomes at Carver Park, Hillside Terrace, among others. This typically happens weekly, and staff walk the grounds and treat for rats. Residents can do their part for exterior pests by not throwing garbage on the ground, by putting garbage in plastic garbage bags, putting the bags in the appropriate garbage can or dumpster (depending on the site), and fully closing the lid. Also, it is helpful if very young children are not sent out with the garbage, as they tend to leave the bags on the ground and not put them in the garbage can.

****

Topic #16--Radiators and Fire Safety

Public Hearing Comment #36: From Bonnie Cooper, Hillside Terrace

For the Hillside building, we have children and we still have radiators. Those are not safe. If a child touched that, that's a Child Protective Services case. No one is listening to that issue. These radiators are too hot for people that can't breathe, we have windows that can't even open, so if there is a fire in the building, we can't get out of the door, the only way we can get out is the window. How is the fire department going to get us out, people that can't go down the stairs?

HACM Response to Topic #16 Radiators and Fire Safety:

HACM follows industry standards and safety is our first priority.

In the case of radiators, they are used in housing around the country. Injuries could only be sustained with extended exposure- someone would have to maintain contact with the radiator to get burned. It is no different than a stove or oven. Our family units where the majority of our children live do have covers over the radiators. If the cover is missing, the resident should advise the property manager. Care must be taken to avoid accidents.

Depending on the type of development, HACM has windows that are designed to open and windows that are not designed to open. If windows that should open do not, or if the resident is not sure, the resident should put in a work order or inquire with the property management office. This would also be inspected during the annual unit inspection.

Sprinkler systems in HACM's high rises are visually inspected monthly (we are only required to inspect yearly) to ensure there are no leaks, broken gauges, or loss of pressure. We do a quarterly

flow test on each floor. We perform an annual test with more in-depth testing and inspecting of the sprinkler system.

****

Topic #17: Department of Neighborhood Services Inspections

Public Hearing Comment #37: From Bonnie Cooper, Hillside Terrace

I've reported all this to DNS and have gotten nowhere. This lady Jamie at DNS, she works for HACM. I want to know if that's a conflict of interest. You're working for DNS and you're also working for HACM. We're trying to get to the bottom of that.

Public Hearing Comment #38: From Charlene Bell, College Court

DNS is working with HACM; they're not helping us, so I want you to know that too. I told them all about my issues—about the mice coming out of the hole in the wall and that I almost broke my neck falling off the toilet. It did not get taken care of until the new manager came to the building. He showed me there was a note that the problem had previously been fixed. I told him that you see these pictures of the hole in my wall-does it look like it's fixed? They put mousetraps in my house to catch mice and I said I'm afraid of those mice, why are you putting these traps in my house? You're not fixing the problem, you're putting a bandaid on it.

HACM Response to Topic #17 Department of Neighborhood Services Inspections:

HACM wants to confirm to all HACM residents and to the general public that the inspectors that work for the Department of Neighborhood Services (DNS) are the employees of DNS. While they may be assigned by DNS to inspect HACM properties when requested, they are not employees of HACM. That is not true.

If DNS receives a complaint, they reach out to the complainant and schedules an inspection. When they perform an inspection, it can result in an order to the property owner (HACM) or it may be not verified if no violations are observed. If it is an order, DNS gives the property owner a due date as may be prescribed in the Milwaukee Code of Ordinances or DNS policies, depending on the type of repair/action. HACM must schedule a reinspection with DNS once the item has been resolved. If violations remain at reinspection, HACM may be find a reinspection fee. If an item remains in violation after the due date, the inspector may refer the order to Municipal Court for further enforcement.

****

Topic #18: Customer Service

Public Hearing Comment #39: From Albert Washko, Jim Luther New Hope Center

I am a board member at the Jim Luther New Hope Center, one of the largest food pantries in Milwaukee. We have overlapping interests with HACM as we serve many of the same people. We provide food insecurity solutions for our clients, many of whom are your clients. I'm a retired federal executive. I was with the VA Hospital system for over 30 years—at one time I was responsible for 23 VA hospitals. One of my responsibilities was to ensure that there was a good customer service orientation which is what public service is all about. It appears to me that listening isn't enough. I learned that the hard way over my thirty years. I've learned that good customer service requires dialog. It appears that this is missing as this turnout today and the lawsuit and the other turnouts reflect that there is a pretty serious communication problem. What is needed is a structure for dialog, a structure for community service dialog, and that means not only is there listening, but there is also feedback. I would be very happy as someone that has experience in that area to help you find models that will work for you. And I would be happy to help you as well and I can leave you my card.

Public Hearing Comment #40: From Charlene Bell, College Court

We have official people telling us "Those are our buildings, maam." These are your senior people, talking to us residents. They don't care. They were bringing a man through the building. I heard it was someone from HUD. But they said I could not talk to him as it wasn't my concern. I bet the camera crews want me to talk. I bet they won't ask me to be quiet. They have staff that do not know how to speak respectfully. That's one of the reasons the previous manager got attacked, because she didn't know how to talk to people. She spoke with me like I'm a kindergartener. I'm closer to 60 than I am 18. Go to the office--don't talk to me in the hallway.

HACM Response to Topic #18 Customer Service:

HACM's residents and participants are our customers, and HACM is committed to providing high-quality customer service. In the past year, HACM's Human Resources department has added specialist staff with a goal of establishing ongoing trainings in a variety of modalities for both new and existing employees. HACM has engaged staff – from its Rent Assistance Voucher offices, to the Property Managers and maintenance staff at its properties, from frontline staff to managers at all levels of the organization – in a variety of trainings, both industry-specific and with a focus specifically on customer service.

We also want to point out that HACM's 5-Year PHA Plan for 2025 to 2029 includes a number of objectives under Goal #4 that are specifically related to the goal of providing excellent customer service.

If residents feel that a staff person has provided poor customer service, HACM practice is to direct them to contact the supervisor of the employee in question, or alternately, to contact HACM's Human Resources department.

HACM shares Mr. Washko's appreciation in the value of genuine dialogue as well. HACM may reach out to Mr. Washko, as a potential partner in service to our residents, to explore models of dialogue between and amongst staff and residents.

HACM's residents and participants are our customers, and we expect all staff to provide excellent customer service. If HACM corroborates information that staff members are acting inappropriately, HACM will deal with it promptly in accordance with our personnel policies regarding employee conduct.

****

Topic #19: Retaliation

Public Hearing Comment #41: From Bonnie Cooper, Hillside Terrace

The management talks to residents very unprofessionally and rudely. We report matters to DNS with complaints, and then later management issues a violation. What is this for—is this retaliation?

HACM Response to Topic #19 Retaliation

HACM does not tolerate retaliation against a resident. If HACM corroborates information that an action taken by an employee was not justified by circumstances and policies and was instead retaliation, HACM will deal with it promptly in accordance with our personnel policies regarding employee conduct.

****

Topic #20: HUD Quality Assurance Division Report

Public Hearing Comment #42: From Kelly Glustott, Common Ground

I'm a community member and a volunteer with Common Ground. I have been an advanced practice nurse and served patients in hospice and palliative care. During that time, I have learned that no matter who a person is or where they live, their home is one of the most important things to them. There home is not just a place to close the door. Their home is somewhere where they can feel safe, security, clean, and a place that supports their best health. I now serve as a volunteer coordinator for a nonprofit that provides services to older adults, including Arlington Court.

I noted that in your Five-Year Plan, you did not discuss the progress you have made on the Quality Assurance Division Corrective Action Plan. As of the end of June, in fact, HACM reported that they had only closed 2 of 30 total findings. That's 5% progress. If I hired an employee or a volunteer and they performed only 5% of the corrective actions I made a year ago, they would be fired. Is 5% progress acceptable to you?

HACM Response to Topic #20 HUD Quality Assurance Division Report:

HACM has been responding to several Corrective Action Plans from the U.S. Department of Housing and Urban Development (HUD), including a previous one from the HUD Field Office related to the 2022 Monitoring Review, the new SEMAP Corrective Action Plan from the HUD Field Office, and the Quality Assurance Division Corrective Action Plan. Yes, it is true that a number of the recommended corrective actions have not been closed out.
However, one has to keep in mind that the majority of these corrective actions are in progress and by their nature are not a quick turnaround item. However, the end result and the impact on improvement of performance in will be long-lasting. The majority of the corrective actions are related directly or indirectly to the following actions that were required by HUD:

1. HUD required HACM to engage a financial management consultant/auditor to perform a forensic audit—a 100% review of all financial transactions for the five years from 2017 through 2022 related to the voucher program; ensure correction of any errors found; identify any items towards possible misuse of funds; and any variances must be researched, reconciled, corrected and prior period adjustments prepared for correction of the unrestricted net position (UNP) and/or restricted net position (RNP) balances.

   Note that HACM engaged CliftonLarsonAllen LLP (CLA, CPAs) to perform the financial records reconstruction/forensic audit. The firm assigned staff to perform the review to ensure timely completion. The work started in October 28, 2023 starting with the review of 2017 transactions and CLA has been continuing to work on the other four years of transactions. The work is in its final

stages and should be completed shortly. Once the 100% participant file review is completed, there may be additional impacts upon the UNP and RNP depending on corrections needed.

- YARDI had been implemented as HACM's housing software since August 2019 and as the financial/accounting software for the Housing Choice Voucher financial transactions since 1/1/2023. However, the use of a separate software system for accounting (Multiview) created some potential for errors or unreconciled differences. One of the corrective actions from QAD is that HACM work with YARDI to replace Multiview and to use YARDI as the financial accounting software enterprise-wide for HACM.

  This has been in process during 2024 with the goal to perform setup of the system and train staff, so that HACM can use YARDI as the financial software enterprise-wide by January 1, 2025.

- QAD required HACM to hire an independent third party contractor to perform a 100% participant file review for all participants in the voucher program, ensuring that the participant files are complete and correct; that the income, rent and other calculations are correct; that FSS updates related to the 50058 are correct; and that all corrections that are needed to Yardi or to the 50058 record are made by the contractor and track the necessary corrections to the record so that any needed changes are made in HUD's PIC and VMS systems.

  QAD also clarified in the final corrective action plan that the 100% file review should be completed concurrently with the contracting out of the HCV program administration/operation and be performed by the same contractor.

- As another corrective action, QAD required HACM to develop an RFP to contract out the management and operation of the entire Housing Choice Voucher program to an experienced contractor.

  The RFP was released earlier in the year with responses due by 3/8/2024. Evaluations of proposals including interviews and references have been completed and a recommendation is expected to be submitted for Board review and approval at their October 2024 meeting.

****

Topic #21: HVAC System at Victory Manor

Public Hearing Comment #43: From Rob Chernow, Common Ground

I was a field-commissioned Officer during the Vietnam War and when I came back, and I ran for a the Veterans Stand Down for homeless veterans and their families for several years. My question has a lot to do with Victory Manor which was a new project that was put up basically for veterans. Residents were using their ovens to keep warm last winter. What have we done to fix the issues with the air conditioning units at Victory Manor? Your senior staff originally denied this issue but then admitted it to the Journal Sentinel. They have provided the residents with space heaters. They have hired Southport Heating and Cooling to work in and out of the apartments to tinker with the system, but nothing seems to be fixed. This is not a way to honor veterans like myself and others who live there. And, where there appear to be conflicts of interest when the building was built, because when I was in the construction industry, the parties that were responsible for constructing the building would have been responsible for fixing the problems, and they weren't.

HACM Response to Topic #21 HVAC System at Victory Manor:

The Heating, Ventilating and Air Conditioning (HVAC) system at Victory Manor is a Variable Refrigerant Flow (VRF) system. It uses refrigerant liquid in a modified heat-pump system to provide both heating and air conditioning in the building. A main advantage to this system is that individual apartments can have heating or air conditioning at the same time. In other words, one apartment can be in heating mode and another can be in cooling mode. This can be especially important during "shoulder" months when temperatures can range between 40 to 70 degrees Fahrenheit.

Almost from the beginning of the occupancy of Victory Manor, there were problems with the VRF system. During the first year of occupancy, the air conditioning could not cool the building to the level the residents were requesting. During the subsequent heating season, there were issues with the level of heat being supplied to the building. The original HVAC contractor was continually working on the system to correct the issues. Many consultants were brought in to diagnose what was causing the problems. Unfortunately, it took much longer to determine a "solution" to the problems than anyone expected. In approximately 2022, the VRF system appeared to stabilize enough to provide fairly consistent heating and air conditioning for the building. Individual apartment units were still having problems but the "overall" system issues seemed to have stopped.

In 2023, more problems with the VRF system arose and both the original contractor and Travaux spent a lot of time trying to determine what was causing the problems. During visits to the apartments, it was found that the thermostats in many of the units had "locked out" and were

not functioning as they should. This was a primary cause of the individual apartment HVAC problems. At that time, it was found that some of the thermostat settings, which had been set with limitations on both upper and lower temperature limits, had been "hacked" to allow some of the apartment units to request heating over the set upper temperature limits. This was found at more than 25% of the units. It is assumed, someone "unlocked" the system to allow temperatures outside of the limits. In this unlocked condition, parameters within the thermostats were being set to a condition that fully locked the system and stopped it from working altogether.

In 2024, at the request of the residents, the investor, PNC Bank, engaged a third-party engineer to inspect the apartments. The inspection was completed in May – June, 2024. One of the basic results of the inspection is a suggestion to replace the thermostats with a "simpler" model that would allow the residents to adjust the temperature for comfort but would not allow access to the more sensitive parameters of the HVAC system. The initial attempt at replacing the thermostats did not work and alternative solutions are being investigated. Additional results of the PNC inspection are being reviewed at this time.

In conclusion, the HVAC system at Victory Manor can and has been supplying the required heat, 68 degrees Fahrenheit, to the building. There is no danger to the residents from low temperatures. We are attempting to develop a strategy to modify the HVAC system to provide more comfort to the residents in a safe and economical fashion.

****

Topic #22: Significant Amendments and Public Hearings

Public Hearing Comment #44: From Cornelius Sawyer, Highland Gardens

Are you aware that I asked for the removal of the million dollar threshold--- the requirement that you don't have to report anything that is under a million dollars? The exact time that they implemented this policy is when the performance of the housing authority declined from high performer to troubled. So, since they know that those two things coincided, they need to start reporting down to the micro-dollar what they are using money for.

HACM Response to Topic #22 Significant Amendments and Public Hearings:

Pages 31-32 of the Annual PHA Plan requires the PHA to provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. The definition was last changed in 2018 when it was updated by the HACM Board of Commissioners, after a review by the

HACM management and the Resident Advisory Board. Prior to 2018, HACM's policy on the definition of significant amendment and substantial deviation had not been updated in many years.

A significant amendment is a change in policy that significantly and materially alters HACM's stated mission, goals, objectives and activities as stated in the Plan. Significant amendments require a PHA to put out a public notice for a public hearing which can result in a delay in responding to an issue.

The significant amendment policy that was approved by the HACM Board of Commissioners in 2018 was that the significant amendment/public hearing process should not be triggered by minor changes in a capital budget or in minor wording changes. Rather, it should be reserved for items such as major changes or additions to a capital item, material changes to rent policies, admissions policies, etc., or major changes on demolition, disposition or conversion activities.

The speaker appears to be referencing the portion of the definition regarding certain capital fund items. The definition of significant amendment included items such as the addition of a capital fund project that is not included in the current 5-year action plan of over $1,000,000. This was an increase from the previous definition of $250,000. The determination was that a smaller change of $300,000 or $500,000 in the capital budget of $8 million annually did not appear significant enough compared to the annual or 5-year capital plan to require a public notice process for a public hearing before the Board of Commissioners. In addition, this larger threshold is not unusual for larger public housing authorities nationwide.

In addition, under HACM's Procurement Policy, any contract that is $250,000 or more would need to be approved by the Board, so the item would be discussed and voted on at a HACM Board of Commissioners meeting when an actual contract comes before the Board.

****

Topic #23: Resident Services and "Union-Busting"

Public Hearing Comment #46: From Cornelius Sawyer, Highland Gardens

The Housing Authority thinks I'm taking it lightly that they have staff members that have been union-busting resident organizations. Even though I have told staff in one instance the person is unreported. Because they took it so lightly, me and the other presidents that I work with, the request is termination of those two employees. The union-busting has got to stop. I want the board to really pay attention to this one because when we did the RO President's meeting with HUD, HUD said it is not allowed. If those employees want to keep their jobs, then you need to

speak with me about those employees keeping their jobs. I don't care how highly you perform, when your performance includes criminal actions against people and their rights, they have to go.

HACM Response to Topic #23 Resident Services and "Union-Busting":

Resident organizations or resident councils are independent entities separate from the public housing authority, and as such, they follow their organization bylaws as well as the overall regulations from HUD that govern resident organizations. A public housing authority such as HACM does have some responsibilities related to resident organizations that are outlined by HUD in the regulations, including: providing technical assistance and information to resident organizations; providing assistance in monitoring resident council elections in coordination with a third-party independent monitor; and funding resident participation annually, approving resident participation funding budgeted activities, and auditing the spending of the resident participation funds. HACM does not condone retaliation against any individual resident or resident organization. The Chief Operating Officer-Program Services will follow up with the speaker to get more details regarding the specific allegation.

****

Topic #24: Resident Organization Funding

Public Hearing Comment #46: From Cornelius Sawyer, Highland Gardens

I'm asking for money because in order for resident organizations to operate properly, each resident organization should receive an additional $10,000. I'm asking for that because it seems that every charitable organization in the city that wants to do something that HACM is happy with gets funding, except for the organizations that Housing has to work with—the resident organizations. Let's fund these ROs so that we can afford to get lawyers and do what we need to do to operate properly. we can do what we need to do and get lawyers and get funded properly. I'm trying to make things easier, especially for persons with cognitive issues, this will be my second time asking for accounting software for the resident organizations.

HACM Response to Topic #24 Resident Organization Funding:

HUD encourages public housing residents to be actively involved in their communities particularly through duly-elected resident councils. Resident councils work to improve residents' quality of life and support residents in creating a positive living environment in their community. To support resident participation, HUD provides funding to public housing authorities (PHAs) for resident participation activities and part of this funding is reserved for resident councils. This transfer of funds from the housing authority to the resident council and the related agreements, creates a partnership between the housing authority, resident council, and HUD.

In years when Congress provides sufficient funding, HUD provides housing authorities with $25 for every occupied, public housing unit for resident participation activities. Of this amount, $15 for each unit annually goes to the resident council and the other $10 can be used by the PHA to pay for costs related to resident participation. The PHA may choose to fund resident councils above $15 per unit each year. Funding can only be provided to a resident council through a written agreement between the housing authority and resident council. This resident participant funding is only for public housing developments or for RAD units that were converted from public housing in RAD developments.

In addition to the amount required by HUD, HACM has historically voluntarily included an additional amount of $3 per public housing/RAD unit in separate funding to Resident organizations.

Finally, while HACM would certainly like to be able to increase the amount of funding for resident organizations, we are unable to at this time due to by the number of other priorities that we need to fund, including but not limited to maintenance and repairs, public safety and all other operating costs from a limited budget.

****

Topic #25: Salary Levels and Comparability

Public Hearing Comment #47: From Cornelius Sawyer, Highland Gardens

As a RAB member, I'm familiar with the Section 3 program that housing authorities must follow, which promotes hiring residents to the greatest extent possible. Currently, HACM does not give a pension anymore. I've heard from people who are getting $10,000 less than what they are supposed to be paid. You can't pay someone significantly less than the median incomes for the jobs. And HACM says that they can't get people to work for them. Or they leave. Of course they leave HACM, because they are being paid $10,000 less than somewhere else. By helping people be successful, they can become homeowners. We need to get the salaries paid to these individuals higher that what is currently being paid so that it is equivalent to the median income.

HACM Response to Topic #25 Salary Levels and Comparability:

In 2017, HACM conducted a compensation study in partnership with Gallagher Benefits Services. The study allowed HACM to determine how to pay out employees, and retain current ones through fair salaries. HACM's objectives of the study were to:

- Conduct a comprehensive compensation study
- Market price benchmark jobs based on job content
- Ensure alignment with the external market

- Confirm jobs within HACM that are at a similar level of complexity and decision making are in the same grade
- Recommend implementation strategy for proposed changes

The project consisted included Job analysis and classification; job evaluation; compensation study and methodology; and recommendations/next steps. The study incorporated the following:

- Reviewed current systems to understand issues and needs
- Position description questionnaires were used to gather information on each job's duties, responsibilities, and decision-making level
- This information was used as the basis for creating the classification structure
- Use of the Decision Band Method Job evaluation methodology
- Use of market data from comparable organizations and the nearby geographic area
- Balance internal equity and market data to develop a salary structure
- Cost implementation options for the proposed salary structure

The Compensation Plan was presented to the Board of Commissioners in February 2017, so it is now seven years old. Like most organizations, HACM's Human Resources department will continue to review hiring concerns to see if there is needs to update the information in our compensation grading structure or in the ranges for each grade (low, mid, high).

****

Topic #26: Waiting Lists and Retention

Public Hearing Comment #48: From Cornelius Sawyer, Highland Gardens

The agency plan is too waiting list oriented. There is a mandatory 80% retention rate that is required. That does not exclude people that meet financial levels to leave out of housing. But when you have people leave housing to be homeless, there is a difference.

HACM Response to Topic #26 Waiting Lists and Retention:

It is in the best interest of landlords to retain good tenants. However, we are not aware of any requirement for a "80% retention rate", either by HUD or any other entity.

However, HACM agrees that resident retention is important, which is one of the reasons that HACM agreed with the RAB's previous comment and incorporated an objective in our 5 Year PHA Plan goals to it as follows:

f. In addition to being efficient in filling vacant units, HACM will continue work to improve resident retention and reduce move-outs. Resident retention is often improved by: (1) communicating timely and effectively with residents; (2) dealing with maintenance requests timely; (3) taking

actions with neighbors that are causing issues, and (4) working with residents to maintain street appeal and cleanliness.

****

Topic #27: Complaint Resolution

Public Hearing Comment #49: From Cornelius Sawyer, Highland Gardens

Hopefully in the future, you guys will be more receptive to these issues. As Commissioners, you do have the right to do certain things. When people have complaints to you guys, especially about the Executive Director or his staff, they should be vented. That is a conflict of interest. Let's get someone else in place to take these complaints, even if it's Common Ground—they're taking complaints anyways. Let the complaints go to them and we'll have better communication at these meetings.

HACM Response to Topic #27 Complaint Resolution

The Housing Authority of the City of Milwaukee (HACM) is committed to addressing resident complaints in a timely and effective manner. The process for handling complaints varies based on the nature of the issue. If site staff are unable to resolve a complaint, residents can seek further assistance from HACM's Resident Liaison division or request a formal grievance hearing with their property manager.

Below is a breakdown of the available options for different types of complaints:

EMPLOYEES & CONTRACTORS

For issues related to HACM employees or contractors, residents should file a formal complaint with HACM's Human Resources department.

PUBLIC SAFETY

Residents should contact the **Milwaukee Police Department (MPD)** for:

- Violent crimes or emergencies (e.g., assault, robbery, domestic violence).
- Serious or life-threatening situations (e.g., active break-ins, armed individuals).
- Observations of illegal activities (e.g., drug dealing, gunshots).
- Situations where there is a direct and immediate threat to someone's life or safety.
- Any criminal activity that requires a police report for legal or insurance purposes.

Residents should call 9-1-1 for emergencies and MPD's nonemergency line at 414-933-4444 for nonemergency matters.

Residents should contact **HACM's Public Safety Department** for:

- Suspicious behavior or activity within HACM properties.
- Non-violent disturbances or conflicts among residents.
- Security concerns or breaches in common areas.
- Non-emergency safety concerns like loitering or noise complaints.
- Requests for safety escorts or assistance within HACM property.

Residents can contact Public Safety for non-emergency assistance 24/7 by calling (414) 286-5100 or by submitting an online public safety concern form (the website is https://www.hacm.org/programs/public-safety-silent-complaint-form). Complaints may also be submitted anonymously.

PROPERTY CONDITIONS

If property management staff or their supervisor are not providing an adequate response, residents may escalate their concerns to the City of Milwaukee's Department of Neighborhood Services.

RENT / ACCOUNT DISPUTES

For rent or account-related issues, residents should first contact their property management staff, as they are most familiar with residents' accounts. If concerns are still unresolved, residents can reach out to a member of the Resident Liaison team.

SECTION 8 (RENT ASSISTANCE VOUCHER) PARTICIPANTS

Section 8 participants should reach out to the Section 8 (Rent Assistance) office at 414-286-5650 for issues related to their participation in the program. If a participant has an issue with the property they are leasing, they should first contact the landlord. If they are unable to get a satisfactory resolution, they should contact the Section 8 office.

FAIR HOUSING

Federal law prohibits discrimination in housing based on race, color, national origin, religion, sex, family status, and disability. Residents can file a fair housing complaint with the U.S. Department of Housing and Urban Development (HUD). Complaints to HUD can be filed online at https://www.hud.gov/fairhousing/fileacomplaint , by mail, or by calling (800) 669-9777.

If issues are not resolved through these existing processes, they may be elevated to the Board of Commissioners.

****

Topic #28: Contract with Nan McKay

Public Hearing Comment #50: From Nicole Binns, College Court

To address this consultant's thing—what are we consulting? Why do we have a five-year plan about consulting and what are you consulting for? Because we (the residents) need to be consulted about how we are treated, misrepresented and mismanaged at HACM. And ripped off. Why are we consulting? And who is Nan McKay—we don't even know her? That's my concern. And my concern is that we have to have more sympathy and empathy.

Public Hearing Comment #51: From Ann Ritchey, Common Ground

How much money have you paid Nan McKay in total over the past five years?

HACM Response to Topic #28 Contract with Nan McKay

Nan McKay and Associates, Inc. is contractor based out of California that has extensive experience in providing services to many public housing authorities for more than 40 years. Such services have included separate functions in public housing or housing choice vouchers, including direct program management, certification and recertification, inspections, technical support, performance improvement tools, call center services, operational and organizational assessments, training, and many other types of services.

Regarding contracts with Nan McKay, in early 2022, HACM was in urgent need for a new Independent Entity (IE) to provide certain HUD-required services for PHA-owned units, including but not limited to, determination of initial rent to owner and annual redetermination of rent to owner. HACM solicited pricing for a variety of services including these IE services from Nan McKay and Associates, Inc. in April 2022 and HACM submitted the selection of Nan McKay to the HUD local field office for approval as required by the regulations, and received approval from HUD. The original award was effective May 16, 2022 with an option to add four additional one-year terms upon mutual consent of both parties.

In response to the HUD Field Office recommendations from the September 2022 on-site monitoring review to increase outsourcing of certain functions, HACM amended the original purchase order with Nan McKay to outsource a portion of initial eligibility certification processing of applicants selected from the HCV waitlist, as well as a portion of annual recertification processing of HCV participants. Nan McKay has been completing the last of the assigned participant files that had been assigned to them for initial eligibility and recertification and we have terminated that portion of the contract services effective September 30, 2024.

At this time, they will still continue to act as an Independent Entity for certain actions that HUD requires an IE, such as rent determination for HACM-owned units.

The amount of the Purchase order with Nan McKay is currently a cumulative total of $650,000 for these services from 2022 to 2024. Once all invoices have been received from Nan McKay through 9/30/24, HACM may need to request Board approval for one final amendment of an additional amount between $50,000 and $100,000 for final payment for these services.

Topic #29: Process for the RFP for the Management and Operation of the Voucher Program

Public Hearing Comment #52: From Ann Ritchey, Common Ground

Everyone should have the opportunity to live in a decent place where they can be satisfied with their lives. In your five-year plan, you say you plan to hire a third party to do a 100% participant file review of all voucher files. Why are you planning to hire a for-profit company to do the job? Will you publicize the results of that review?

Public Hearing Comment #53: From Christlyn Stanley, Common Ground

I'm a member of Common Ground and a member of the community. As a public servant, we are called to do good, to seek justice and to correct oppression. Some of the things I heard today really makes my heart cringe. We have the responsibility to protect the rights of those we consider to be afflicted or destitute. Milwaukee is an awesome City and I think we have the resources to do that.

In your five-year plan, you say that you are contracting a third-party to manage and operate the entire Housing Choice Voucher program and that HACM will soon make the recommendation to the Board of Commissioners. How many candidates did you evaluate for the RFP? Who was a part of the evaluation team? How will you as the Board evaluate the recommendation that HACM staff put forth? Will you have a public meeting about the recommendations? How will you hold that third party accountable and how soon will the decision be made? We are substantially past our original RFP deadline, and participants are stressed and suffering because HACM's Section 8 office is so terrible.

HACM Response to Topic #29 Process for the RFP for the Management and Operation of the Voucher Program:

As one of the Corrective Actions required by HUD's Quality Assurance Division, HACM was required to solicit contractors through a Request for Proposal to manage and operate the Housing Choice Voucher program. In addition, another required part of the scope of work was a 100% participant file review of all voucher files over a period of time. These were required corrective actions in our Corrective Action Plan with HUD.

HACM worked on drafting the RFP and submitted it to HUD several times for their feedback and comments in an effort to ensure: (a) we were addressing all required items from the corrective action plan; and (b) that the list of services to ensure quality management of the program was comprehensive.

The RFP was issued on 1/19/24 and proposals were due on 3/8/2024. The RFP did not specify that a Respondent to the RFP had to be a for-profit company; it could be a qualified for-profit, not-for-profit, or a public housing authority. The language in the RFP was:

> "The Housing Authority of the City of Milwaukee (HACM) intends to enter into a contract with a highly-qualified professional consulting and management firm or a highly-qualified public housing authority to manage and operate all of the key functions of HACM's entire HCV program."

Six proposals were received by the closing date of the RFP:

1. AMA Consulting Group, LLC (AMA), Lake Mary, Florida
2. CVR Associates, Inc. (CVR), Tampa, Florida
3. Milwaukee County Dept. of Health & Human Services Housing Services, Milwaukee, WI
4. Nan McKay and Associates, Inc. (Nan McKay), El Cajon, CA
5. Pivotal Property Management MKE, LLC (Pivotal), Milwaukee, WI
6. Quadel Consulting and Training, LLC (Quadel), Indianapolis, IN

A recommendation for selection of the contractor is tentatively scheduled to go to the HACM Board of Commissioners for review at their October 2024 meeting and additional information about the selection process and recommendation will be available at that time.

Regarding the 100% participant file review, the results of the review will be submitted as required to HUD. While details that may contain personally identifiable information may need to be redacted, summaries of the overall results of the review will be available as part of responses to our Corrective Action Plans.

****

TAB

C.5
Troubled PHA

C.5. Troubled PHA.

The Housing Authority of the City of Milwaukee (HACM) remains deeply focused on implementing the federal corrective action plans under the strict oversight of the U.S. Department of Housing and Urban Development (HUD). Extensive time and resources are being dedicated to executing these corrective actions, which are aimed at stabilizing the agency's operations and enhancing service delivery. These plans are HACM's best path forward to strengthen the agency, improve how we serve those in our programs, and provide affordable housing options for future generations. HACM continues to work collaboratively with local, regional, and federal HUD officials and greatly appreciates their partnership and oversight. We will continue to rely on HUD's deep expertise to guide us.

In April 2024, HUD shared updates regarding their ongoing monitoring and assessment of HACM. All of these items are reflective of the reviews previously conducted by HUD.

2022 Housing Choice Voucher Monitoring Corrective Action Plan
Reviews conducted by HUD's Milwaukee Field Office and the Quality Assurance Division September 19, 2022 to November 18, 2022

The HUD Milwaukee Field Office identified 109 corrective action items. Of those, HACM has completed 52. Another 54 are duplicative action items that overlap with the HUD Quality Assurance Division corrective action plan. The HUD Quality Assurance Division will continue monitoring the status of these action items. Three action items were not completed and will be carried over into the 2023 Section Eight Management Assessment Program Corrective Action Plan.
As HACM continues to implement the corrective measures, significant strides have been made in strengthening the operational foundation of its Section 8 Housing Choice Voucher program. HACM has:

- Implemented the full Yardi financial suite to combine all programmatic and financial data for the Section 8 program into one integrated software program.
- Revised and adopted updated Standard Operating Procedures (SOPs) for protecting personally identifiable information, processing housing assistance payments, quality control, the Section Eight Management Assessment Program, Voucher Management System reconciliation and reporting, and end of program participation and terminations
- Revised and adopted the updated Accounting and Financial Policies and Procedures Manual.
- Launched the YARDI Aspire training module to provide job-specific and Housing Choice Voucher program training to staff.
- Increased use of Independent Entities to carry out operational activities such as conducting inspections, processing participant selection, establishing project-based voucher contract rents, and determining rent reasonableness.
- Issued a Request for Proposal for the operation of HACM's Housing Choice Voucher program.

2023 Section Eight Management Assessment Program (SEMAP) Corrective Action Plan *Review conducted by HUD-Milwaukee September 2023 to November 2023 for fiscal year end 2022*

There were 26 findings, many of which are a continuation of those identified in 2022 by the HUD's Milwaukee Field Office and HUD's Quality Assurance Division. As a result, this corrective action plan contains outstanding corrective actions remaining from the onsite monitoring review HUD's Milwaukee

Field Office completed in 2022. HACM continues to work on implementing corrective actions that are required in the SEMAP Corrective Action Plan.

HACM will remain in SEMAP troubled status until HACM identifies a suitable vendor to operate its Section 8 program, and that vendor conducts a 100% participant file review for the 2017 - 2022 period, as required by the corrective action plan. HACM anticipates that this will be completed by the end of 2025.

Public Housing Assessment System (PHAS) Score Report

HUD's Real Estate Assessment Center issued the PHAS score (an annual assessment of the Public Housing portfolio) and designation for HACM's fiscal year end 12/31/2022. On June 30, 2023, HUD issued a preliminary score of 77 and designated HACM as a standard performer. This assessment is specific to HACM's public housing operations; however, the financial portion of the assessment was impacted by the ongoing corrective action plans for HACM's Section 8 program. As a result, HACM's auditor was unable to render an opinion on HACM's 2022 financial statements by HUD's 9/30/2023 deadline. This resulted in the financial score of the assessment automatically being zeroed out, changing HACM's PHAS score from 77 to 53 and its designation status from standard to troubled. HACM is confident that the agency will return to at least a standard performer status once the auditor is able to issue an opinion.

TAB

Attachment A: Summary of ACOP & Admin Plan Changes

Summary of Changes to ACOP and Administrative Plans

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (public housing)

NOTE—A number of HOTMA changes have been delayed by HUD for a year.

Chapter 3, Eligibility

1. Page 3-25, 3-30, and 3-31: For applicants---Change the suitability evaluation criteria from a one-year lookback period to a three-year lookback period for landlord references to evaluate:
    a. If there is a pattern of unsuitable past performance in meeting financial obligations, especially rent; or
    b. If there is a pattern of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residents which may adversely affect the health, safety or welfare of other residents.

Chapter 8, Leasing and Inspections

1. Part II-Inspections: Various changes related to the change from Housing Quality Standards (HQS) inspections to NSPIRE inspections. These include:
    a. Change in terminology from “Annual Inspections” to “Self-Inspections”
    b. A new Section 8-II.C on NSPIRE Inspections that describes procedures for when HUD or HUD-contractors perform NSPIRE inspections.

Chapter 9, Reexaminations

1. Page 9-16: A change back to the previous policy of performing interim recertifications when there is an increase in income of more than $200 per month.

ADMINISTRATIVE PLAN (vouchers)

Chapter 3, Applications, Waiting List, and Tenant Selection

1. Page 4-3, Made change to explain that the waiting list is a two-step process, with families originally providing only the information needed to make an initial assessment on the family's eligibility and to determine the family's placement on the waiting list (a preapplication).
2. Page 4.6 to 4.7 and Page 4.18—The previous version contained an error. HACM accidentally used the Nan McKay default template version to state that applicants will be placed on the waiting list according to preference (s) and according to the date and time their complete application is received by the PHA.

   This has been replaced with a paragraph to explain the actual practice, that HACM's Housing Choice Voucher tenant-based voucher program uses a lottery to select pre-applications to be placed on the wait list. They are randomly assigned a number and are placed on the wait list in the order of the assigned number and according to PHA preference(s). it also clarifies that all Project-Based Voucher waiting lists are selected according to the appropriate preference(s) and then in order by date and time of the application.

3. The section also states that for the first lottery that will be held in the last half of 2024, a selection of a minimum of 5,000 applicants from the preapplication list will be selected to be placed on the waiting list and that the rest of those will be notified via email that they were not selected.

Chapter 5, Briefings

1. Page 5-7, Included a list of the 15 zip codes that had been identified as areas of opportunity that are outside of areas of poverty or minority concentrations, for which HACM has decided several years ago to use Small Area Fair Market Rents (SAFMRs) as the payment standard.

Chapter 11, Reexaminations

1. Page 11-13: A change back to the previous policy of performing interim recertifications when there is an increase in income of more than $200 per month. This was in part to respond to a HUD recommendation due to HACM's current shortfall position.

Chapter 16, Program Administration

1. Part V: Section 8 Management Assessment Program (SEMAP): Pages 16-35 to 16-43: Made changes based on HACM's SEMAP Corrective Action Plan to add more detail. It also states that HACM will conduct its SEMAP quality control testing of the various indicators on a monthly basis in accordance with its Standard Operating Procedure.

TAB

Attachment B: ACOP

(Admissions & Continued Occupancy Policy)

TAB

Attachment C: Section 8 Administration Plan

TAB

Attachment D: Public Notice

5. A claim may be filed at the Milwaukee County Courthouse, 901 N. 9th Street, Milwaukee, Wisconsin, Room 207.

6. This publication is notice to any persons whose names or address are unknown.

The names or addresses of the following interested persons (if any) are not known or reasonably ascertainable: Unknown/unlocated heirs - children of Misty Sandor

If you require reasonable accommodations due to a disability to participate in the court process, please call 414-278-4444 prior to the scheduled court date. Please note that the court does not provide transportation.

DATE SIGNED: July 16, 2024

Electronically signed by
Jennifer O. Hemmer
Deputy Register in Probate

PAUL T. EBERHARDY
SBN: 1045304
2211 10th Ave., Suite B
South Milwaukee, WI 53172
414-744-1283

2632693/7-19-26/8-2

Notice to Creditors
(Informal Administration)
Case No. 2024PR000964

STATE OF WISCONSIN, CIRCUIT COURT, MILWAUKEE COUNTY
IN THE MATTER OF THE ESTATE OF BARBARA K DELFORGE

PLEASE TAKE NOTICE:

1. An application for informal administration was filed.

2. The decedent, with date of birth 05-18-1927 and date of death 03-14-2023, was domiciled in MILWAUKEE County, State of WISCONSIN, with a mailing address of 10201 W WISCONSIN AVE, MILWAUKEE WI 53226.

3. All interested persons waived notice.

4. The deadline for filing a claim against the decedent's estate is 10/18/2024.

5. A claim may be filed at the MILWAUKEE County Courthouse, 901 N 9TH STREET, Wisconsin, Room 207.

DATE SIGNED: July 15, 2024

Electronically signed by
Jennifer O. Hemmer
Deputy Register in Probate

Dean Delforge
SBN: 1010536
N19W24200 Riverwood Dr Ste 145
Waukesha, WI 53188
262-787-0600

2632602/7-19-26/8-2

Order Setting Time to Hear Petition for Administration and Deadline for Filing Claims
(Formal Administration)
Case No. 2022PR001278

STATE OF WISCONSIN, CIRCUIT COURT, MILWAUKEE COUNTY
IN THE MATTER OF THE ESTATE OF Cecilia Bloom

A Petition for Formal Administration was filed.

THE COURT FINDS:

The decedent, with date of birth August 3, 1940 and date of death May 1, 2022 was domiciled in Milwaukee County, State of Wisconsin, with a mailing address of 3325 East Thompson Avenue, St. Francis, WI 53225.

THE COURT ORDERS:

1. The Petition be heard at the Millwaukee County Courthouse, Milwaukee, Wisconsin, Room Via Zoom: Meeting ID 985-6940 6650 Password: 193418, before Circuit Court Judge/Circuit Court Commissioner Patrice A. Baker, on September 10, 2024 at 3:15 PM.

You do not need to appear unless you object. The petition may be granted if there is no objection.

2. The deadline for filing a claim against the decedent's estate is October 14, 2024.

3. A claim may be filed at the Milwaukee County Courthouse, 901 N 9th S, Milwaukee WI, 53233, Wisconsin, Room 207.

4. Heirship will be determined at the hearing on petition for final judgment.

5. Publication of this notice is notice to any persons whose names or addresses are unknown.

If you require reasonable accommodations due to a disability to participate in the court process, please call (414) 278-5362 prior to the scheduled court date. Please note that the court does not provide transportation.

DATE SIGNED: July 10, 2024

Electronically signed by
Patrice A Baker
Court Commissioner

Please check with person named below for exact time and date.

Dean R. Troyer
SBN: 1029084
PO Box 370252
Milwaukee, WI 53237
414-272-0290

2632458/7-19-26/8-2

NOTICE TO CREDITORS

IN THE MATTER OF THE J. THOMAS MEYER 1988 REAL ESTATE TRUST

J. Thomas Meyer, whose date of birth was August 13, 1934, died domiciled in Hidalgo County, State of Texas, on June 18, 2024. J. Thomas Meyer's post office address was 401 North 41st Street, Unit 11, McAllen, Texas 78501. J. Thomas Meyer was the grantor of the J. Thomas Meyer 1988 Real Estate Trust (the "Trust").

Pursuant to Wisconsin Statutes section 701.0508, Katherine McDevitt Meyer and Patrick M. McDevitt, as Trustees of the Trust, with the power to pay the debts of J. Thomas Meyer, hereby provide notice that all claims against J. Thomas Meyer or the Trust for payment of the debts of J. Thomas Meyer must be filed with the person listed below WITHIN 4 MONTHS AFTER THE TIME OF THE FIRST PUBLICATION OF THIS NOTICE, or be barred.

The address for filing claims is:

J. Thomas Meyer 1988 Real Estate Trust
c/o John A. Herbers
Reinhart Boerner Van Deuren s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202

The date of first publication of this notice is July 19, 2024.

2632445/7-19-26/8-2

NOTICE TO CREDITORS

IN THE MATTER OF: SHARON E. STROM REVOCABLE TRUST Dated July 18, 2013.

Pursuant to Wis. Stat. §701.0508, any claims against Sharon E. Strom who died on June 18, 2024 a resident of Milwaukee County, State of Wisconsin with a post office address of 708 S. 110" Street, West Allis, WI 53214 must be filed with the trustee in care of:

Thomas F. Raasch
131 W. Layton Ave., Suite 301
Milwaukee, WI 53207

On or before November 12, 2024.

This notice shall be published once a week for three (3) consecutive weeks in the Daily Reporter.

The first publication date shall be within fifteen (15) days from the date of this notice.

Dated this 8th day of July 2024
/s/ Thomas F. Raasch
Attorney Thomas F. Raasch
131 W. Layton Ave., Suite 301
Milwaukee, WI 53207
414-483-1777

2629706/7-12-19-26

Notice to Creditors
(Informal Administration)
Case No. 2024PR000229

STATE OF WISCONSIN, CIRCUIT COURT, MILWAUKEE COUNTY
IN THE MATTER OF THE ESTATE OF MOHAMMED A. MOHANY
Date of Death: 08/04/2023

PLEASE TAKE NOTICE:

1. An application for informal administration was filed.

2. The decedent, with date of birth 06/23/1986 and date of death 08/04/2023, was domiciled in Milwaukee County, State of Wisconsin, with a mailing address of 3416 South 66th Street, Milwaukee, Wisconsin 53219.

3. All interested persons waived notice.

4. The deadline for filing a claim against the decedent's estate is September 28, 2024.

5. A claim may be filed at the Milwaukee County Courthouse, 901 North 9th Street, Milwaukee, Wisconsin, Room 207.

DATE SIGNED: June 26, 2024

Electronically signed by
Robert B. Rondini
Probate Registrar

Attorney Lawrence J. Haskin
SBN: 1017416
Haskin Law Office, LLC
7300 South 13th Street, Ste. 104,
Oak Creek, WI 53154
(414) 762-5105

2629640/7-12-19-26

Hearings and Minutes

PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2025-2029 PUBLIC HOUSING AUTHORITY (PHA) FIVE-YEAR PLAN, 2025 PHA ANNUAL PLAN AND A SIGNIFICANT AMENDMENT TO THE 2023-2027 CAPITAL FUND PROGRAM FIVEYEAR ACTION PLAN

This 45-day Public Notice is hereby given that the Housing Authority of the City of Milwaukee will hold a public hearing for its Public Housing Authority (PHA) Five-Year Plan for the period 2025-2029, the 2025 PHA Annual Plan, the Admissions and Continued Occupancy Policy (ACOP), the Section 8 Administrative Plan, and all other associated documents. There will also be a public hearing regarding a Significant Amendment to the Capital Fund Program (CFP) Five-Year Action Plan for the period 2023 to 2027. The purpose of the hearings will be to receive comments as required by the U.S. Department of Housing and Urban Development (HUD).

The Housing Authority of the City of Milwaukee will hold the public hearings on **Wednesday, September 11, 2024 at 3:00pm in City Hall Room 301-A, 200 E. Wells St., Milwaukee WI 53202.** The Board reserves the ability to place time limits on all speakers, in order to allow the widest practical number of interested parties a chance to speak on the documents above. All comments must be related to the documents listed above.

Interested persons are invited to submit their comments on the Housing Authority's 2025-2029 PHA Five-Year Plan, the 2025 PHA Annual Plan, the Admissions and Continued Occupancy Policy (ACOP), the Section 8 Administrative Plan, and all other associated documents, or on the Significant Amendment to the 2023-2027 CFP Five- Year Action Plan via email at communications@hacm.org or via mail to Attention Mr. Willie Hines, Secretary-Executive Director, Housing Authority of the City of Milwaukee, P.O. Box 324, Milwaukee WI 53201. **All written comments must be received by Monday, September 9, 2024.**

A draft of the PHA Five-Year Plan, PHA Annual Plan, associated documents, and the amended 2023-2027 CFP Five-Year Action Plan will be available for review at www.hacm.org for a 45-day comment period: July 26, 2024 - September 9, 2024.

Please note that upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids. For additional information or assistance contact Marquetta Treadway at 414-286- 5100 (voice) or 414-286-3504 (TDD) or by writing to the ADA Coordinator at HACM, P.O. Box 324, Milwaukee WI 53201.

2634843/7-26

Other

PUBLIC NOTICE:
HACM Will Close Section 8 Housing Choice Voucher and Public Housing Waiting Lists on August 1, 2024; Project-Based Voucher Waiting Lists Will Remain Open

The Housing Authority of the City of Milwaukee (HACM) will close its Section 8 Housing Choice Voucher and Public Housing waiting lists on August 1, 2024 at 4:00 pm CDT. Applications will be accepted at waitlist.hacm.org through August 1, 2024 at 3:59 pm CDT. If you have already applied and want to check your status or update your contact information, please visit myportal.hacm.org.

HACM will continue to accept applications for its Project-Based Voucher program and its unsubsidized properties. Visit waitlist.hacm.org for more information.

The demand for housing assistance far exceeds the funding provided by the U.S. Department of Housing and Urban Development. As a result, there are currently thousands of people on HACM's Section 8 Housing Choice Voucher and Public Housing waiting lists. Closing these waiting lists will help make the lists more manageable and give applicants more realistic expectations about how long they might wait before being selected

Applicants on HACM's waiting lists must keep their information current so HACM can reach them when they are selected. If HACM is not able to reach an applicant, they will be removed from the waiting list.

An announcement will be made when the Section 8 Housing Choice Voucher and Public Housing waiting lists reopen. HACM announces waitlist openings via a public notice, its website hacm.org, social media, and press releases.

For reasonable accommodations, please contact the Housing Authority ADA Coordinator Marquetta Treadway at 286-5678, (FAX) 286-0552, (TDD) 286-3504 or by writing to the Coordinator at 5125 W. Lisbon Avenue, Milwaukee, WI 53210.

2634847/7-26

NOTICE OF A PUBLIC INPUT SURVEY IN PREPARATION OF THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM'S 5-YEAR (2025-29) CONSOLIDATED PLAN FOR THE CITY OF WEST ALLIS

Notice is hereby given that the Community Development Block Grant Program of the City of West Allis will release an electronic survey on Monday, August 5, 2024, at 8:00 a.m. The City will use this survey to collect public feedback on the performance of the last 5-years as part of the 2020- 24 Consolidated Plan. The survey will also be used to seek input looking ahead to the future, and how the City should best utilize federal block grant funds over the next 5-years (consolidated 5- year plan) an approximate $8.3 million of funding compromised of federal allocation and programgenerated income.

The federal money is from the Department of Housing and Urban Development (HUD) and helps with things like housing rehabilitation, building strong neighborhoods (reducing slum and blighting influences), helping businesses grow, and helping low to moderate income people access to important resources. We need your help to figure out what our community needs most. Your ideas will help us decide where to focus our efforts.

Community Development Block Grant funds consider two priorities when funding projects and activities. It must either (1) benefit low and moderate-income persons as individuals or as a group; or (2) aid in the elimination of slums or blighting influences.

You may express your feedback through the online Community Development Block Grant Consolidate Plan survey available through the City of West Allis website. The survey will be available to the public for thirty days, beginning Monday, August 5, 2024, at 8:00 a.m. and closes September 3, 2024, at 5:00 p.m. The Community Development Block Grant (CDBG) Program allocations for fiscal years 2025-29 will be available for review on the City of West Allis website.

Upon reasonable notice, the Office of Planning & Zoning will furnish appropriate auxiliary aids and services when necessary to afford individuals with disabilities an equal opportunity to participate in CDBG Consolidated Plan survey and be informed of the service projects and activities carried out by the Community Development Block Grant Program through the City of West Allis Office of Planning & Zoning.

Dated this 22nd day of July year 2024.

Publish Friday, July 26th and Friday, August 2nd of 2024.

2634069/7-26/8-2

PUBLIC NOTICE

Cellco Partnership and its controlled affiliates doing business as Verizon Wireless (Verizon Wireless) proposes to modify antennas on an existing 70-foot tall building at an approximate centerline height of 76 feet above ground level. The site location is near 750 N Lincoln Memorial Drive, Milwaukee, Milwaukee County, Wisconsin (43° 2' 25.8" N, 87° 53' 50.2" W).

HISTORIC PROPERTIES EFFECTS - Public comments regarding potential effects on historic properties may be submitted within 30 days from the date of this publication to: to Environmental Corporation of America, ATTN: Annamarie Howell, 1375 Union Hill Industrial Court, Suite A, Alpharetta, GA 30004 or via email to publicnotice@eca-usa.com. Ms. Howell can be reached at (770) 667-2040 x 108 during normal business hours. 24-001900 MMT

2633325/7-26

Summons

PUBLICATION SUMMONS
Case No. 24-CV-004807
The Honorable
Glenn H. Yamahiro
Case Code 30404
(Foreclosure of Mortgage)
The amount claimed exceeds $10,000.00

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY
Wells Fargo Bank, N.A. 11625 N Community House Rd Charlotte, NC 28277 Plaintiff, vs. Joyce M. Doxtater a/k/a Joyce Doxtater a/k/a Joyce Myrna Doxtater 2360A S Burrell St Milwaukee, WI 53207-1520 John Doe Doxtater 2360A S Burrell St Milwaukee, WI 53207-1520 Capital One Bank (USA), N.A. 1680 Capital One Dr McLean, VA 22102-3407 Portfolio Recovery Associates, LLC 150 Corporate Blvd Norfolk, VA 23502-4952 Bank of America, N.A. 25 W 51st St New York, NY 10019-6902 Midland Funding LLC c/o Corporation Service Company, Registered Agent 33 E Main St Ste 610 Madison, WI 53717-2915 Cavalry SPV I LLC c/o CT Corporation System, Registered Agent 301 S Bedford St Ste 1 Madison, WI 53703-3691 Defendants.

THE STATE OF WISCONSIN
To each person named above as a defendant:

You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you.

Within 40 days after July 12, 2024 you must respond with a written demand for a copy of the complaint. The demand must be sent or delivered to the court, whose address is 901 N. Ninth Street, Milwaukee, WI 53233-1425 and to Gray & Associates, L.L.P., plaintiff's attorney, whose address is 16345 West Glendale Drive, New Berlin, WI 53151-2841. You may have an attorney help or represent you.

If you do not demand a copy of the complaint within 40 days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 5th day of July, 2024.
Gray & Associates, L.L.P.
Attorneys for Plaintiff
By: Robert M. Piette
State Bar No. 1018058
Case No. 24-CV-004807
16345 West Glendale Drive
New Berlin, WI 53151-2841
(414) 224-1987

Gray & Associates, L.L.P. is attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

2629677/7-12-19-26

Class A Fermented Malt Beverage Retailer's License

MANGAT, Daya SINGH, Agent Singh, Inc 3927 W Villard Av 1 1409 N PROSPECT Av #401

Class A Malt & Class A Liquor License

MARTIN, Jennifer J, Agent SAL B, LLC 123 W Oklahoma Av 14 2929A S 15TH St

Class B Tavern License

GORDON, Andrew OTTO, Agent MITCHELL STREET ARTS COLLABORATIVE INCORPORATED 710 W HISTORIC MITCHELL St 12 710 W HISTORIC MITCHELL St #311

Josephine Vargas La Escondida 1400 W ORCHARD St 12 2805 S KINNICKINNIC Av

SCHWARTZ, Paul H, Agent RIVERWALK COMMONS LLC 423 N WATER St 4 2578 S Delaware Av

2634249/7-25-26-29

THE DAILY REPORTER

A Division of BridgeTower Media
P.O Box 745929
Atlanta, GA 30374-5929

Invoice #	745714694
Invoice Date	07/26/2024
Customer	CITY Of Milwaukee
Payment Terms	Net 30
Due Date	08/25/2024

BILLING ADDRESS

Patricia Dee
CITY Of Milwaukee Housing Authority
Po Box 324
Milwaukee WI 532010324

ADVERTISER

CITY Of Milwaukee Housing Authority, ID:
Po Box 324
Milwaukee WI 532010324

INVOICE REF	MEDIA	DATE	PO
1007370411	The Daily Reporter - Public Notice	07/26/24	

EDITION	QTY	AD SIZE
Legal - Government	1	Legal - City of Milwaukee Inch Rate

Thank you for your business!
IOID: 2634843
Index: Government
Category: Hearings and Minutes
Affidavit Reference: City of Milwaukee

Subtotal	$88.48
Tax	$0.00
Credits	$0.00
BALANCE DUE	$88.48

REMITTANCE STUB TO BridgeTower Media

Invoice #	745714694 The Daily Reporter - Public Notice	**Date**	08/25/2024	**Customer ID**	ID: 26574, CITY Of Milwaukee Housing Authority
Amount Enclosed:					

Acceptable Payment Methods

PREFERRED METHOD

To Pay by ACH Transfer:
Bank: Bank of America
Send ACH remittance email to
ar@bridgetowermedia.com
Account Number: 237025443017
Routing: 053000196

OTHER METHODS

To Pay by Check use the following address:
Please include invoice number on check
BridgeTower OpCo, LLC
P.O Box 745929
Atlanta, GA 30374-5929

To Pay by Credit Card:
Use the Click to Pay Online link located
on the email you received or Contact
Accounts Receivable: 866-802-8214
Please have your Invoice Number
and Credit Card Number Ready

To Pay by Wire Transfer:
Name: BridgeTower OpCo, LLC
Bank: Bank of America
Swift Code: BOFAUS3N
Bank Address: 100 North Tryon Street
Charlotte, NC 28255
Account Number: 237025443017
Routing: 053000196

The Daily Reporter
225 East Michigan Street
Milwaukee, WI, 53202
Phone: 4142251801 Fax: 0

THE DAILY REPORTER

Affidavit of Publication

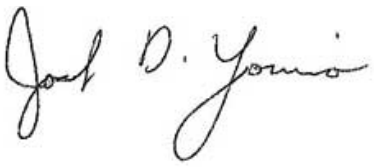
To: CITY Of Milwaukee Housing Authority - Patricia Dee
Po Box 324
Milwaukee, WI, 532010324

Re: Legal Notice 2634843, City of Milwaukee

State of WI }
} SS:
County of Milwaukee }

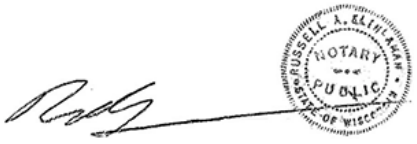
I, Joe Yovino, being duly sworn, depose and say: that I am the Authorized Designee of The Daily Reporter, a daily newspaper of general circulation in Milwaukee, County of Milwaukee, State of WI; that a notice, of which the annexed is a printed copy, has been duly and regularly published in the The Daily Reporter once each day for 1 consecutive days; and that the date of the publication were as follows: 07/26/2024.

Publishers fee: $88.48

By: 

Joe Yovino

Sworn to me on this 26th day of July 2024

By: 

Russell A. Klingaman
Notary Public, State of WI
No. -
Qualified in Milwaukee County
My commission expires on December 31, 2026

PUBLIC NOTICE OF PUBLIC HEARING FOR HACM'S 2025-2029 PUBLIC HOUSING AUTHORITY (PHA) FIVE-YEAR PLAN, 2025 PHA ANNUAL PLAN AND A SIGNIFICANT AMENDMENT TO THE 2023-2027 CAPITAL FUND PROGRAM FIVEYEAR ACTION PLAN

This 45-day Public Notice is hereby given that the Housing Authority of the City of Milwaukee will hold a public hearing for its Public Housing Authority (PHA) Five-Year Plan for the period 2025-2029, the 2025 PHA Annual Plan, the Admissions and Continued Occupancy Policy (ACOP), the Section 8 Administrative Plan, and all other associated documents. There will also be a public hearing regarding a Significant Amendment to the Capital Fund Program (CFP) Five-Year Action Plan for the period 2023 to 2027. The purpose of the hearings will be to receive comments as required by the U.S. Department of Housing and Urban Development (HUD).

The Housing Authority of the City of Milwaukee will hold the public hearings on **Wednesday, September 11, 2024 at 3:00pm in City Hall Room 301-A, 200 E. Wells St., Milwaukee WI 53202.** The Board reserves the ability to place time limits on all speakers, in order to allow the widest practical number of interested parties a chance to speak on the documents above. All comments must be related to the documents listed above.

Interested persons are invited to submit their comments on the Housing Authority's 2025-2029 PHA Five-Year Plan, the 2025 PHA Annual Plan, the Admissions and Continued Occupancy Policy (ACOP), the Section 8 Administrative Plan, and all other associated documents, or on the Significant

Amendment to the 2023-2027 CFP Five- Year Action Plan via email at communications@hacm.org or via mail to Attention Mr. Willie Hines, Secretary-Executive Director, Housing Authority of the City of Milwaukee, P.O. Box 324, Milwaukee WI 53201. **All written comments must be received by Monday, September 9, 2024.**

A draft of the PHA Five-Year Plan, PHA Annual Plan, associated documents, and the amended 2023-2027 CFP Five-Year Action Plan will be available for review at www.hacm.org for a 45-day comment period: July 26, 2024 - September 9, 2024.

Please note that upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids. For additional information or assistance contact Marquetta Treadway at 414-286- 5100 (voice) or 414-286-3504 (TDD) or by writing to the ADA Coordinator at HACM, P.O. Box 324, Milwaukee WI 53201.

2634843/7-26

TAB

Attachment E: Public Hearing

PUBLIC HEARING COMMENTS ON 2025 ANNUAL PUBLIC HOUSING AUTHORITY (PHA) PLAN, 5-YEAR PHA PLAN FOR 2025 to 2029, ADMISSIONS AND CONTINUED OCCUPANCY PLAN, AND ADMINISTRATIVE PLAN—Comments Sorted by Topic

Topic #1-----Board Meeting Accessibility and Transparency:

Public Hearing Comment #1—From Roye "Chris" Logan, Mitchell Court:

Groups of residents have tried meeting with the Board of Commissioners at its public board meetings several times this year to explain complaints, but many of the meetings have been changed to virtual meetings or cancelled. The last in-person board meeting was in January 2024. In 2023, there were only two virtual meetings. We have wanted to provide our complaints in person to the Board; we have gone to the news; we have requested meetings at the housing developments. But, the Board has not responded to these requests. It is as if we are just poor people that can be ignored. What will you do to be more transparent and to establish better communication with HACM's residents?

Public Hearing Comment #2: From Vivian Jones, Lapham Park

We have been down here several times before, but until now have not been able to speak directly with you. Thank you for finally giving us the chance to speak. You have heard our concerns and the issues that we have had living in the HACM properties—they are nothing new to you. But, it has taken you over 365 days to come and see what is going on in the housing developments.

We are tired of living in place that is not fit to be living in, but yet we still have to have somewhere to live. We shouldn't be living in a place with rats and roaches and bedbugs. We shouldn't live in a place where people go around shaking on our doorknobs. We shouldn't live in a place where drugs are being sold in a building we are living at. We shouldn't be living in a place where security is no help to us. We've got security but they tell you, "I'm not allowed to get involved in that." A guy was robbed right on our front door of our building, a car was stolen, but they say they are not allowed to get involved in that. Why not? What is security good for? Nothing. Just like you guys—you sit here, you go home, you're comfortable. You don't have to worry about shaking bedbugs off of you. You don't have to worry about people knocking on your door at 3 or 4 in the morning. You say your job is to help us live better---you need to get up and do your job.

Public Hearing Comment #3: From Brittany Walker, Common Ground

I've had the pleasure of organizing some really spectacular people here in this room who are fighting for things they really shouldn't have to fight for. I'd like to ask just a few questions. I heard some things about your five-year plan and how you are willing to commit to certain things. Will you commit to having all your future meetings in person? Will you commit to having public comment at those meetings? Will you commit to reflecting those changes in the bylaws? Will you also commit to changing the definition of a quorum in the bylaws to a majority of seven, rather than a majority of appointed commissioners? In addition, while you say the board has toured some developments, we don't really believe the board has conducted a full tour of these developments? Will you allow residents to lead this tour so you're not just going in circles or touring vacant apartments with no real issues? Will you allow tenants who in many cases have lived there for multiple years to tour you around and show you where the actual problems are?

HACM Response on Topic #1 Board Meeting Accessibility and Transparency:

Over the past several months, the Board and HACM have received both directly and indirectly many complaints, concerns and requests for action. Additionally, board members have met with community groups, visited some of the HACM properties and have spoken with public housing experts. Board members are also open to doing visits at housing developments with attendance by resident leadership of that development as well. HACM leadership will also visit the developments regularly and meet with residents.

While the Board will occasionally need to have an option for a specific Board member to attend virtually from time to time due to their availability, the Board of Commissioners stated at the September 11, 2024 Board meeting that they are committed to have all Board meetings in-person moving forward.

Regarding public comments, Wisconsin Open Meeting laws give the public a right to attend and observe local government meetings but not a right to participate; a "public comment period" is allowed but is not required under Wisconsin Open Meeting laws. For several decades prior to the current members serving on the Board, the Board has not historically had as part of their agenda a regularly scheduled "public comment period." The one exception is when HACM has scheduled a public hearing on a specific policy change or action, such as annually regarding the PHA Plan or on other significant amendments to plans or policies, when HACM is soliciting input from residents and other members of the public.

However, the Board of Commissioners are in favor of implementing a public comment period, and has requested HACM leadership to begin to research the feasibility of having public comment periods as a regular agenda item as well as best practices on how to implement it to ensure compliance with open meeting laws, agenda items, discussion of specific items not on the agenda, time for comments, etc.

Regarding the quorum, changing the bylaws related to quorum is not a simple decision that does not have other consequences. The potential challenge in changing the definition of quorum to a "majority of seven" is that if commissioners leave the board or if there is a gap period in appointments of new members so that there are fewer members on the board, it could create the condition that no business could be transacted for several months until the Mayor has appointed and Common Council approves new members. This would include action items that are necessary for housing authority operations such as contract approvals, HUD requirements, necessary policy changes, etc.

****

Topic #2: Accountability and Performance Reviews

Public Hearing Comment #4: From Roye "Chris" Logan, Mitchell Court

HACM's biggest issue is bad management, from the top down. We have raised important concerns and complaints about the behavior or background of a number of senior management staff at HACM, but the Board has not held them accountable. When there have been issues, HACM has moved managers around from one development to another. The entire staff culture is rotten. The 5-Year Plan has nothing about how the Board is going to hold staff accountable for doing their jobs and treating residents respectfully. Our question is how will the Board hold HACM leadership accountable? Will you commit to performing performance reviews the Executive Director, Willie Hines, as a good board will do, and will you publicly share the results? Will you mandate that Mr. Hines perform performance reviews of his senior leadership team?

Public Hearing Comment #5: From Betty Newton, Becher Court

You say you are holding the HACM staff accountable? Are you holding the Executive Director accountable? Because you gave him a raise. With all of the bad things happening in HACM buildings, you gave him a raise, even though he makes more than the Governor and the Mayor. Why does he deserve a raise when he won't even come and meet us. I have invited him to my building several times. Never called me to have a conversation though I have given him my

numbers. If you ignore the RO Presidents, you definitely ignore the residents. We're not going to attack you; not physically.

Public Hearing Comment #6: From Kevin Solomon, Common Ground

We want to have Mr. Hines speak as it says on the agenda and that you, the Board, demonstrate that you hold staff accountable right here, right now by asking him hard questions.

Number 1--HUD and Baker Tilley said they could not determine the financial net position of the Housing Authority. You don't even know the status of your own books. There's three million dollars missing. There's a thousand plus illegal self-payments. You claim you're poor but you can't even figure out your net position. So that excuse frankly feels vapid.

Number 2—I'm more concerned that you had no questions for Mr. Hines. One Board member asked no questions this entire board meeting. Another isn't even here. Another one—who knows if she's here and how many meetings has she missed now. No transparency, no justification given. You don't have any questions for Mr. Hines? Can you ask him now? We're here, we're waiting. The problem is that you talk to him behind closed doors and you cancel meetings. You talk about dialog but you don't do it. One helpful thing would be if you talk to him publicly and not behind closed doors. You're not doing your job. We're glad you're going to do a performance review—you didn't say when. We're glad you're going to hold him accountable—you didn't say how you were going to do that. That's the result of our pressure for two years. But you haven't demonstrated it here.

HACM Response on Topic #2 Accountability and Performance Reviews

To address the concerns that the Board is hearing from residents, the public, and through media outlets, the Board has challenged HACM leadership to take action, to investigate issues or concerns, to hold their teams accountable, and above all to strive to provide safe, clean and welcoming environments for residents.

As many are aware, HACM has been put on corrective action plans by the U.S. Department of Housing and Urban Development due to financial and accountability issues. The Board has requested that HACM leadership have as their top priority to get back on track by implementing corrective actions. The corrective action plans, which also includes the requirement to contract with an experienced agency to operate our Section 8 voucher program and a forensic audit to do a 100% review of all HCV financial transactions for five years from 2017 to 2022, are a significant focus in both the Annual PHA Plan and the Five-Year PHA Plan.

HACM is committed to transparency in our communications with internal and external stakeholders. HACM expects that departmental personnel and HACM leadership respond promptly to inquiries received generally or through the public records request process. Additionally, HACM utilizes a variety of communication channels, such as websites, email, social media, digital signage, tours, meetings, and newsletters to share information about the agency's operations. Our goal is to keep stakeholders informed and engaged in our efforts to advance HACM's mission.

Additionally, the Board will be implementing more intensive board oversight, via asking questions, requesting additional information, and digging into the details of frequent concerns from residents and the public.

At the September 11, 2024 public hearing, the Vice-Chair of the Board of Commissioners confirmed that the Board will conduct performance appraisals of current HACM leadership. Under the Wisconsin Open Meetings Law, one of the exceptions to open meetings is that closed sessions are authorized for certain specific employment issues for "considering employment, promotion, compensation or performance evaluation data of any public employee over which the governmental body has jurisdiction or exercises responsibility." While the actual performance review will be done in a closed session similar to those done by other public bodies (such as the Fire and Police Commission or other public bodies in the state), the HACM Board of Commissioners is committed to having the entire board participate in performance evaluations of the Secretary-Executive Director. In addition, the Board has committed to be transparent with their findings and recommended actions.

While the exact format has changed over the years, HACM has performed performance management evaluations of each staff by their supervisor(s), evaluating against accountability goals and standards that were established at the beginning of the year.
In the current 5-Year PHA Plan for 2025 to 2029, HACM has included a specific objective (f) regarding performance management under "Goal 1: Optimize HACM's organization structure, processes, and procedures to attain resiliency and long-term sustainability."

Objective (f) under Goal 1 covers accountability goals and performance management. It currently reads as follows:

> "(f) HACM's Performance Management System, supervisors annually review and revise to ensure clear accountability goals and standards have been established that are integrated into every employee's performance management review."

In the 5-Year Plan, we will clarify further by adding the following sentence to Goal 1, Objective (f): "The HACM Board of Commissioners will perform similar performance management review(s) of the Secretary-Executive Director."

****

Topic #3---Accessibility

Public Hearing Comment #7: From Marion Moore, College Court

A resident at College Court complained about accessibility in our buildings for persons with mobility disabilities. She noted that the doors are not wide enough and that she has to turn her stove sideways so she can enter the kitchen. How come your plan does not take into account reasonable accommodations such as this?

Public Hearing Comment #8: From Barbara Leigh, County Commission for Persons with Disabilities

I serve on the County Commission for Persons with Disabilities and also have experience with HACM . Our theater company worked with residents at Lapham Park creating original theater, music and dance. The residents were wonderfully talented people and I enjoyed working with them. This was about eight years ago. I'm just so saddened by what seems to have disintegrated. Lapham Park was a model agency, a beautiful place. It now seems to be falling apart.

I'm the Chair of the Housing Access Committee. I really have concerns about the number of people that HACM serves that have a disability—some very major and some more minor, but definitely a disability. I think it would be so important to have someone on your Board, for example, who has a disability, maybe in addition to being a resident. They would have that personal contact and could go into these apartments and make sure they are accessible. I can testify that many a restaurant, many a public place that say they are accessible are not; there have been many times in such businesses that I have had difficulty getting into a bathroom without major embarrassment. So, please, take that into consideration.

HACM Response on Topic #3 Accessibility:

Residents with disabilities are valued members of our communities. HACM will work with residents to provide reasonable accommodations when needed. All residents can complete a request for reasonable accommodation (also called a Section 504 Reasonable Accommodation), and HACM will review it for consideration and action within federal guidelines.
Currently, HACM has a limited number of accessible units in our Public Housing portfolio due to its aging housing stock. Most of our public housing developments were built between 1937 and the early 1970s, and so are between 50 to 87 years old and the vast majority of these public housing units do not meet accessibility standards.

HACM has renovated a number of our older public housing developments into project-based voucher units through HUD's Rental Assistance Demonstration (RAD) program. These renovations have included more accessible units as part of the overall development renovation, in accordance with the requirements Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act when applicable. Via RAD conversions and the low income housing tax credit (LIHTC) and other funding that may be applied for, HACM is able to provide more accessible units as a required part of the renovations.

To deal with the concern that there are very few accessible units in public housing, in the Administrative Plan revisions that came into effect in early 2023, HACM included the following provision on page 18-33:

> In addition, the PHA may place households that are referred by the PHA's public housing program onto the PBV wait list for a PHA-owned property (e.g., building converted to PBV through the RAD program) if the public housing household has requested and been approved for a reasonable accommodation that either (a) cannot be fulfilled in the public housing program or (2) cannot be fulfilled in a timely manner in the public housing program.
>
> Examples include, but are not limited to these types of circumstances: (a) a resident in public housing requires an accessible unit and no accessible units are available in the public housing program or are available timely; and (b) there is a need for a 2 bedroom unit for a live-in aide, but all units in the public housing program are either 1-bedroom or not accessible.

This change meant that now if a public housing resident who submits a 504 reasonable accommodation request cannot be accommodated in public housing, they may be referred to a Project-Based Voucher unit in a PHA-owned property (such as a building converted to project-based vouchers via RAD) by being placed on a wait list for a unit that meets their approved needs.

Topic #4—Public Address System

Public Hearing Comment #9: From Minister William Harrell, Lapham Park

Why can't Lapham Park Resident Organization use the intercoms to make important announcements to residents, including RO meetings, meal programs, food truck and food distribution, arts & crafts activities, etc.?

HACM Response on Topic #4 Public Address Systems:

In the past, the PA system had been used by a number of buildings for building-wide announcements. However, housing management was informed by our systems professionals several years ago that the current PA systems installed many years ago were not intended for non-emergency use. Rather, they were designed to be used for the building's fire system and other emergencies. The use for other non-emergency purposes such as regular event announcements was wearing out the system prematurely as it was not designed to be used for those purposes. Thus, all HACM housing development staff were informed two to three years ago to restrict building-wide announcements to emergency use only.

However, HACM will continue to evaluate options and costs to see it could be feasible at some point in the future to replace the system for one that could incorporate other periodic announcements.

****

Topic #5--Resident Members of the Board of Commissioners

Public Hearing Comment #10: From Minister William Harrell, Lapham Park

The Board does not have enough Board members right now, but there are a lot of interested residents here. Is it possible to put more residents on the Board of Commissioners, and not the RAB Board which is useless, so that residents can give some input on what is going on and perhaps this would eliminate some of the problems HACM is currently experiencing.

Public Hearing Comment #11: From Betty Newton, Becher Court

Our resident board. I've heard there are supposed to be two residents on the board of Commissioners. Currently for the last three to four years, you've only had one, and I'm questioning if you have that one. I've asked previously whether the current resident on the Board is physically able to fulfill her duties. You came to my building with the Mayor on June 17th, unannounced. You didn't come looking for me—you found me because my residents informed me you were there. It wasn't with the Chair, Ms. Daniels, it was with you, the Vice-Chair, the Vice Chair whose term had expired already. There are supposed to be residents on this Board, then I want to see them and I want to see them doing their job.

HACM Response to Topic #5 Resident Members of the Board of Commissioners:

HACM currently has one of the two seats allotted for residents filled. The other seat became vacant in August 2023, just over one year ago, when that resident, who was also Chair of the Board, passed away. Mayor Johnson has appointed another resident to be a Commissioner, and HACM looks forward to the Common Council confirming the appointment, filling the second resident position on the Board. Chair Sherri L. Daniels is a long-time HACM resident and member of the HACM Board of Commissioners. She is currently stepping back from running the HACM Board Meetings for medical reasons, and while she is not running the meetings, she remains committed to serving her fellow residents as a member of the Board.

The Resident Advisory Board (RAB) is not only HUD-required, but is a proven tool for resident input into plans and policies such as the PHA Annual Plan, Admissions and Continued Occupancy Policy and Administrative Plan, where changes have been made based on input from the RAB.

****

Topic #6—City of Milwaukee Funding for Maintenance Custodial Positions

Public Comment #12: From Franz Meyer

In your 5-year PHA Plan, you state that HACM has hired only 3 of the 5 positions with the $250,000 in funding that the City of Milwaukee awarded to you earlier this year? Only 3 of 5 in a year? Is that acceptable to the Board? What is the timeline for hiring the remainder of the positions? I hope that the Board considers how taxpayers feel when you have not made full and immediate use of money that was awarded to assist HACM with keeping the buildings clean.

HACM Response to Topic #6 City of Milwaukee Funding for Maintenance Custodial Positions:

All five of these custodial positions are currently filled, though staffing levels have fluctuated over the past year. HACM tends to see higher turnover in our lower-wage, entry-level positions like these. The Human Resources team has responded promptly to vacancies and will continue to do so as needed.

****

Topic #7---Pest Control

Public Hearing Comment #13: From Vivian Jones, Lapham Park

We are tired of living in place that is not fit to be living in, but yet we still have to have somewhere to live. We shouldn't be living in a place with rats and roaches and bedbugs. You don't have to worry about shaking bedbugs off you.

Public Hearing Comment #14: From Gidget Aranda, Becher Court

We still have bedbugs, drain flies and rats crawling around our building. When we complain about bedbugs, we wind up getting evicted. We want to follow up with Director Hines to see how this will all be resolved.

Public Hearing Comment #15: From Carmella Holloway, College Court

The bedbugs at College Court are terrible. I shouldn't be paying rent if I'm in an uninhabitable apartment full of bedbugs. Crawling in my ear; crawling all over me; crawling on the walls and the floors I haven't had a decent night of sleep in six months. You go home and have a nice sleep—why can't I have one? I'm human just like you are, but you don't care. They sprayed five time. Watered down-I don't smell nothing. You aren't doing anything. Why should I have to pay rent where I can't lay my head? But yet Willie Hines does nothing about it.

Public Hearing Comment #16: From Kelly Barnes, Hillside Terrace

We also have problems with the rat problem. We have to come in the house before 8 because the rats are so bad. They are not even scared of you. I sent a video showing how close they come to you.

Public Hearing Comment #17: From Charlene Bell, College Court

You might have seen me in the Washington Post article or in the news. I'm a true fighter. If I get pissed off about something, I'm not going to give up. I'm going to keep fighting for true justice. I'm being eaten by bedbugs daily—I have a fresh bedbug bite now. I have my apartment sprayed once a month for the last year and a half and there is still bugs in my house. I spent $100 on bed covers.

Public Hearing Comment #18: From Cornelius Sawyer, Highland Gardens

We keep talking about bedbug. We brought up the fact that every other organization that has employees, even Spectrum, that goes from house to house, put footies on their feet so they won't transfer any pests, especially when they are going from apartment to apartment doing inspections or work orders.

HACM Response to Topic #7 Pest Control:

Pest control is a top priority, both for the well-being of our residents and for the care of our properties. HACM manages pest control through in-house staff who can most efficiently and cost-effectively provide services. HACM also has a purchase order with a third-party vendor to provide secondary pest control services, when necessary.

Services include regular monitoring and treatment of properties and specific pest remediation when reported by residents and staff.

Effective pest control requires a partnership with residents, who play a lead role in proper disposal of trash, upkeep of housing units, and preparation of units for pest control treatment. Early identification and reporting of pests by residents to management is extremely important—if HACM does not know of a pest problem, it may not be found until it is time for a unit inspection.

Once reported, managers will put in a work order for service. Pest control staff will schedule the service and/or inspection and will complete the service. Residents assist in the treatment by preparing for the pest control service. Pest control also determines whether further services are needed or not.

Pest control actively goes to certain exterior areas where a number of complaints from rats have been reported, including Lapham Park, Townhomes at Carver Park, Hillside Terrace, among others. This typically happens weekly, and staff walk the grounds and treat for rats. Residents

can do their part for exterior pests by not throwing garbage on the ground, by putting garbage in plastic garbage bags, putting the bags in the appropriate garbage can or dumpster (depending on the site), and fully closing the lid.

Pest control chemicals have been formulated and improved over the years with the intention to avoid strong odors and staining, also to be safer for pets and people. Some chemicals come in a powered form to be used in a sprayer, so water has to be added in accordance with the instructions by the manufacturer. HACM does not "water down" the chemicals as that would make the entire process ineffective.

There is not conclusive evidence that booties work in reducing spread of bedbugs and it is not currently considered the industry standard to employ them. Bed bugs do not jump; you would have to sit or lean against walls/furniture to get them on your clothes in order to take them to another unit. They can also pose slip hazards. HACM requires maintenance staff to wear slip-proof work shoes to avoid accidents. Roaches don't interact with people and the egg casings are typically in/near their hiding spots, things that make it less likely to transport them from unit to unit. Our techs are trained in pest control and they know how to avoid transferring pests. Other professionals that specialize in cable installation or gas meter installation would not have the same awareness and knowledge.

HACM is committed to continue to work in partnership with our residents and pest control services to keep pests out of our housing.

****

Topic #8 –Safety

Public Hearing Comment #19: From Vivian Jones, Lapham Park

We shouldn't live in a place where people go around shaking on our doorknobs. We shouldn't live in a place where drugs are being sold in a building we are living at. We shouldn't be living in a place where security is no help to us. We've got security but they tell you, "I'm not allowed to get involved in that." A guy was robbed right on our front door of our building, a car was stolen, but they say they are not allowed to get involved in that. Why not? What is security good for? Nothing. You don't have to worry about people knocking on your door at 3 or 4 in the morning. You say your job is to help us live better---you need to get up and do your job.

Public Hearing Comment #20: From Gidget Aranda, Becher Court

My property was stolen in front of my apartment. I made a report to public safety. I called the next day to follow up and they didn't know what I was talking about. There are two cameras in the hallway, so why are they not following up on this? We do not feel safe.

Public Hearing Comment #21: From Kelly Barnes, Hillside Terrace

I have to be careful sending children to the basement because homeless people are either down there or down there doing drugs. That's scary to me coming into my apartment building with my grandkids not knowing what to expect. I feel if we complain or if we are asked to go on the news, I would be totally honest. But you are not being honest. How can you say what is going on in our apartment or apartment complex if you never even came there to look? I just want you to understand what we are going through each and every day.

Public Hearing Comment #22: From Kesha Tate, Hillside Terrace

The residents of Hillside are having problems with the rats, prostitution, the homeless people, and the trash. My kids are not able to go outside due to the fact that the homeless people are out sleeping on the playground or by the trash. They are breaking into our apartments going to the basements to sleep. They are also coming there to buy drugs. I complained about another resident having her boyfriend there selling to them. And nothing has been done, even though he is also on the no trespass list so he shouldn't even be there. The rats are attacking residents. My kids are afraid to go outside due to the drugs, the homeless. Why should I pay to live somewhere where they can't be comfortable and they can't live well? I complained about my neighbor's boyfriend selling and they're trying to break into our units and stuff. We shouldn't have to worry about that.

Public Hearing Comment #23: From Betty Newton, Becher Court

I have asked the Chief of Public Safety multiple times to give us a list of the cameras in our building –the ones that work and the ones that do not work because I get sick of hearing that something was not caught on camera. They stole a fan out of our laundry room. I told them the date that it happened, but they could never come back and tell me who stole it. They stole a table and chairs out of our lobby by two exit doors. They never told us who stole it. And I've asked repeatedly. You can't tell me you don't put a camera by two exit and entrance doors.

HACM Response to Topic #8 Safety:

Across all HACM developments and properties, HACM acknowledges the concerns regarding security presence, response times, and the handling of incidents such as thefts and loitering. HACM's Public Safety is committed to addressing these issues to ensure a safer and more secure living environment for all residents.

Your concerns about individuals gaining unauthorized access to buildings, unescorted guests, or illegal activities occurring in or around our developments are serious matters that our team is actively working to address.

Our Public Safety Specialists have specific roles and responsibilities to resolve safety issues and assist residents. However, HACM's Public Safety's direct intervention may be limited in dangerous situations or emergencies, as we are not the police, do not have arrest powers, and do not carry a gun or weapon. In an emergency, please call 911 immediately. If it is a non-emergency, you can call Public Safety at (414) 286-5100 or you can call the Milwaukee Police Department non-emergency number at (414) 933-4444.

We recognize the importance of timely and effective communication between Public Safety and the residents. Our team is committed to maintaining open lines of communication, ensuring that reports are accurately tracked, incidents are thoroughly investigated, and residents are kept informed of the status of their reports. Public safety staff often attend resident organization meetings when possible, to provide information regarding crime or safety, or answer questions.

Regarding the concerns about the functionality of cameras at all developments, including Becher Court, we are in the process of updating and expanding our camera systems to ensure optimal coverage and to minimize blind spots. We are also coordinating with our IT department to ensure all current camera systems are operational and positioned to effectively monitor key areas such as exits, entrances, and common spaces. We have recently implemented a regular review of cameras in each development at least once a week to identify ones that may be down for a connection reason or that need replacing. At the time it is identified, a work ticket is put in to our Information Technology department that the camera or connection is not functioning. Additionally, we are seeking creative ways to fund improvements such as new cameras or replacements of older cameras to ensure the safety and security of all residents. In the Capital Fund Program -Five Year Action Plan amendment, additional line items were included for security cameras.

We are actively collaborating with HACM Maintenance Services and other relevant departments to address issues like unauthorized individuals accessing buildings and the cleanliness of common areas. We are also coordinating efforts with the Milwaukee Police Department to enhance patrols and interventions where needed.

We have a robust records management system in place that ensures all reports are accurately logged, and there is a clear expectation that residents are informed of the actions taken when Public Safety responds to calls for service. We ensure accountability by making sure follow-up actions are communicated quickly to the residents involved

We also encourage you to review the objectives that are included in the Five Year PHA Plan for 2025 to 2029 under Goal #4 regarding Safety and Security. These incorporate some of the major strategies we have been implementing over the past two years.

We understand that safety is not only about having security personnel or cameras—it's about making sure those resources are effective and that residents can trust the process. HACM Public Safety Department takes concerns seriously, and we are committed to making the necessary improvements to enhance security across all developments, acting in partnership with the community.

****

Topic #9—Access to Amenities

Public Hearing Comment #24: Gidget Aranda, Becher Court

At Becher Court, we still have no access to the kitchen and they still have old nonfunctioning gym equipment. At Becher Court, we still have washing machines that destroy our clothes, or are filled with water. There are 4 washers for 120 units. Why does it take over a month to address this?

HACM Response to Topic #9 Access to Amenities:

For a number of developments, HACM leases the washing machine and dryer service from a local business that works with many multifamily housing developments across Milwaukee, and they maintain and service the machines. The Becher Court property manager has called several times regarding the problems with the one washing machine. She has now called to request replacement of the machine and has unplugged the machine and put an "out of order" sign on it in the meantime. She has also asked them to process the refund to the resident that had clothes damaged.

Residents of Becher Court have access to the amenities of the adjoining Becher Terrace senior living community, which is not owned or operated by the Housing Authority of the City of Milwaukee. To use Becher Terrace's kitchen, Becher Court residents just need ask the Becher Terrace management office. The management of Becher Terrace have stated they will not be replacing the equipment in the exercise room at this time.

****

Topic #10—Work Orders

Public Hearing Comment #25: From Gidget Aranda, Becher Court

At Becher Court, we still have systematic plumbing issues throughout the building.

HACM Response: Becher Court does not have systemic plumbing issues throughout the building. Gidget Aranda contacted the management office at Becher Court on September 27, 2024 to report a clog. It appeared that Ms. Aranda had someone try to unclog her sink and a pipe was broken in the process. HACM's maintenance staff fixed the clog and broken pipe on October 1, 2024.

Public Hearing Comment #26: From Kelly Barnes, Hillside Terrace

My main issue is my grandchildren. They go outside and they can seriously get hurt. There is a steel pipe just hanging from the ground. I have told them numerous times and nothing has been done. The jungle gym that they play on is dangerous because bars are loose on there.

HACM Response: HACM is in the process of identifying and contracting with a vendor to complete the removal of the playground equipment at issue.

Public Hearing Comment #27: From Kesha Tate, Hillside Terrace

Numerous times I've called in work orders for stuff to get done but nothing is getting done. I have to fix stuff myself so my kids won't get hurt. My kids got locked in the bathroom. I put in a work order two months ago—nothing has been done. I've complained about the carpet and my refrigerator. They had to come inspect it to see if I was lying. It got done but still I should not have to constantly call you to put in the same thing over and over again just to get something done. My kids come first.

HACM Response: There is a record of nine maintenance requests for this unit between January 1, 2024, and October 1, 2024. Each work order was completed within the required timeframes

set forth by HACM's funders (24 hours for emergency, 3 days for routine work), with the exception of one item which appears to have been overlooked by staff. Work order #179637 (replace light) was entered on July 22, 2024 and had not been completed as of October 2, 2024. This has been given to the Hillside Terrace manager for immediate action.

Work orders are prioritized based on severity and age. Emergencies take first priority, and all other work orders should be completed on a first-come first-served basis. Flooring replacements, while important, are a budget-restricted item. There are finite resources to make improvements to our units each year, and when those resources are depleted, some improvements must be deferred until the next budget cycle.

Public Hearing Comment #28: From Charlene Bell, College Court

I told them all about my issues—about the mice coming out of the hole in the wall and that I almost broke my neck falling off the toilet. It did not get taken care of until the new manager came to the building. He showed me there was a note that the problem had previously been fixed. I told him that you see these pictures of the hole in my wall-does it look like it's fixed? They put mousetraps in my house to catch mice and I said I'm afraid of those mice, why are you putting these traps in my house? You're not fixing the problem, you're putting a bandaid on it.

HACM Response: There have been no records of mice in this unit. A work order regarding baseboard tile in the bathroom was submitted on April 16, 2024. On July 12, 2024, the new College Court manager had a conversation with Ms. Bell where she expressed concern that mice could enter the bathroom through a missing ceramic baseboard tile. At this time, the manager became aware the April work order had never been fully completed. On July 15, 2024, the work in Ms. Bell's bathroom was completed and her concern was resolved. HACM continues to encourage all residents to report any concerns to the management office.

****

Topic # 11--Inspections

Public Hearing Comment #29: From Brenda Lawrence-Gillum, Common Ground

In your 5-Year plan, you state that HACM will ensure appropriate documentation of inspections for the voucher program. Your 2022 audit found that 10% of voucher properties hadn't been inspected in 24 months and 40% of the inspections were overdue. Once they happen, most of the inspections are quick, check the box type inspections and don't really look at the real conditions. How will you ensure that the inspections happen and are done properly? How will you, as the Board, check the progress and quality of the inspections?

Public Hearing Comment #30: From Bonnie Cooper, Hillside Terrace

You're saying that you're holding HACM accountable but they're walking in and out of our unit without letting us know. I've put up a sign to let them know that this is a privacy law that you cannot come in our unit whenever you decide to.

HACM Response to Topic #11 Inspections:

At the time of the HUD site monitoring review in 2022, there were a number of contributing factors for both the actual number of late inspections and that caused the HUD PIC system to show inspections as late. One of these had to do with how inspections were recorded by HACM into HUD's PIC system. Rather than recording a separate action in the HUD PIC system when an inspection was completed, HACM held it and recorded it when the recertification was complete. If a recertification was late, that inflated the number of late inspections. HACM has made progress in reducing the number of late inspections. In August 2024, YARDI's Late Recertification report showed a total of only 82 late inspections at that time.

While Public housing nationwide has adopted NSPIRE standards as the new type of inspection standard, HUD has delayed the transition from the current standard (Housing Quality Standards or HQS) to NSPIRE. The new transition date is 10/1/2025.

Both HQS and NSPIRE have standards that need to be reviewed as part of the inspection. HUD recently developed NSPIRE so that all housing programs were using a similar standard. The NSPIRE standards and the definition of deficiency is more clearly defined in NSPIRE, so that an inspector knows exactly what a deficiency is (looking at the size of a hole in the wall, for example, to determine whether it is a deficiency or is not a deficiency, and if it is, what type of severity).

In addition, in the voucher program, HACM performs Quality Control Reviews of a sample of inspections by a supervisor or by another qualified person other than the person that originally did the work. The supervisor would go out and do a re-review of the inspection findings. This is part of the SEMAP quality control testing. If the reviewer finds errors or issues with the inspection, they correct the inspection to show items that should have been failed or should not have been failed. They also follow up with the original inspector to provide additional training and explain the errors.

An additional area of quality control testing takes a sample of inspections that failed to test whether the item was appropriately enforced by HACM—was the deficiency corrected by the applicable deadline based on HUD regulations and PHA policy and if not, were other steps taken to abate the Housing Assistance Payment to the landlord and/or issue a voucher to move to another location in accordance with PHA policy.

Regarding notice and whether a resident needs to be present during an inspection/work order, the policies for both public housing and the voucher program are as follows:

Public Housing (Per Chapter 8 of HACM's Admissions and Continued Occupancy Policy):

- HACM's general policy is that we provide at least 48 hours prior to any non-emergency inspection. For regular annual inspections in public housing, the PHA will attempt to provide the family with one-week written notice of the inspection to allow the family to prepare the unit for the inspection.

- Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the Public Housing Authority to enter the unit.

- While the resident is required to be present for move-in inspections, the resident is not required to be present for the inspection. The resident may attend the inspection if they wish.

- For all inspections in public housing: If no one is at home, the inspector will enter the unit, conduct the inspection and leave a copy of the inspection report in the unit.

Voucher program (Per Chapter 8 of HACM's Administrative Plan):

- Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life-threatening emergency, reasonable notice is considered to be not less than 48 hours. Inspections may be scheduled between 8:00 a.m. and 7:00 p.m. Generally, inspections will be conducted on business days only. In the case of a life-threatening emergency, the PHA will give as much notice as possible, given the nature of the emergency.

- When a family occupies the unit at the time of inspection an authorized adult must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

- At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted but is not required.

If staff have not followed these procedures, a resident or participant can submit a complaint with the Property Management Office or with the Voucher program, whichever is applicable.

****

Topic #12—Evictions

Public Hearing Comment #31: From Barb Valley, Lincoln Court

A resident at Lincoln Court mentioned that recently there have been residents that were evicted for reasons, but they keep coming back to the building. Some of them were violent. One fellow poured gasoline around the building as he wanted to get rid of bedbugs. It took 6-8 weeks for him to get evicted. Another resident was beating up residents for no reason. It took over a month for her to get evicted and out of the building. Why does this take so long?

Public Hearing Comment #32: From Sandra Eagle, College Court

In November 2023, my car got vandalized three times in two weeks. Management did nothing. The person that did it lived right next door to me. (note to ken—she lived in 415 and he lived in 412—the person was Aaron Turner). In January 2024, most of the residents suspected him. Later

in January, he admitted to me he did it. What are you going to do about it---Nothing. Where is the problem? He got evicted finally in March 2024.

HACM Response to Topic #12 Evictions:

Determinations on when and whether to evict a tenant because of conduct issues are made on a case-by-case basis depending on the individual circumstances involved. It may also include evaluation of the actual evidence that is available to support eviction due to conduct.

As a general matter, residents facing potential eviction because of conduct issues are provided with a 5, 14, or 30-day notice to vacate depending on the underlying reason(s) leading to the eviction. These notices are sometimes curable, meaning the tenant can stay if they correct their actions, and sometimes not curable, again depending on the individual circumstances.
In the event that a notice is not or cannot be cured and the tenant has not vacated the premises voluntarily by the end of the notice period, an eviction action must be brought in Milwaukee County Circuit Court to evict them. After an eviction case is filed, an initial court appearance takes place no more than 25 days after the date of filing the case. If the tenant does not appear and/or there are no disputes related to the eviction, a judge can grant a default judgment in favor of HACM and grant a writ of restitution, which provides that the Sherriff's Department will assist with removing the defendant from the premises within the next 10 days.

In the event a tenant appears at the first hearing and/or there are potential factual issues raised, the court may set a date for a contested hearing to take place up to 30 days after the initial hearing. This second hearing is often further adjourned by the court to allow a defendant to seek legal counsel or to allow recently-retained legal counsel to become familiar with a case.

In the event judgment is entered in favor of HACM in contested eviction cases at one of these subsequent hearing dates, the court grants judgment in favor of HACM and issues a writ, but the court has the discretion to stay the writ for up to another 30 days. Thereafter, the Sherriff has up to 10 days to act on the writ.

In sum, while sometimes fairly quick, some contested evictions resulting from conduct issues can last for multiple months before someone is removed from the property because of the court processes involved.

****

Topic #13--Communications

Public Hearing Comment #33: From Barb Valley, Lincoln Court

I emailed Mr. Hines about a year and a half ago and during our meeting at my building, you said you wanted to check into the details so you could get a complete answer and that you would not forget about me. You forgot about me-- I never heard back.

HACM Response to Topic #13 Communications:

Mr. Hines remembers the meeting he had with Ms. Valley after he had received a letter from her. He believed that the meeting ended with the understanding that the issues discussed had been explained/addressed and no further action was needed.

Since Ms. Valley states that answers are still outstanding, Mr. Hines will provide a full response to the issues raised in her letter.

****

Topic #14—Social Workers and Lutheran Social Services

Public Hearing Comment #34: From Sandra Eagle, College Court

Four years ago, I think you used to have a number of social workers. Instead of getting more, you eliminated them and only have Lutheran Social Services taking care of thousands of people. It took me two weeks to get ahold of Lutheran Social Services, and then it took another two weeks to get an appointment. So then the problem does not get solved, and then management says that, well, "it's your problem—it's not social services problem. " You've got to take care of this issue.

HACM Response to Topic #14 Social Workers and Lutheran Social Services:

Since the 1990s, HACM has had only one social worker on staff, with a significant part of their job responsibilities being to coordinate with and provide technical assistance to the resident organizations and attend resident meetings. While some referrals for social services were done by the HACM social worker, most of the residents referred were assisted by SET Ministry.

At the same time, beginning in 1995, a nonprofit organization named SET Ministry received a grant to develop a service coordination/case management program for seniors and persons with disabilities in public housing, beginning in Lapham Park and then expanding to other public housing

highrise developments. Part of the funding for these services came from a small amount of funding that HUD had included in the operating subsidy for some housing authorities and part came from SET Ministry applying for competitive grants with HUD to fund the services. SET was very successful at that time in applying for competitive grants which funded a number of social workers working across thirteen highrises.

SET Ministry merged with Interfaith Older Adult Services in 2019 to form UNISON. In 2019, the newly-formed UNISON announced they were closing down operations. HACM was able to find another organization with experience in service coordination to take over services—Lutheran Social Services of Wisconsin and Upper Michigan, Inc. (LSS).

Since 2019, the number of service coordinators has dropped, in part due to limited funding. As the ROSS grants that were remaining at the time of the transition from SET Ministry had been expended, the number of social workers decreased as well. Additionally, until recently, ROSS grants were limited and could not be used to fund RAD developments. Due to the decrease in available funds, Lutheran Social Services of Wisconsin and Upper Michigan currently has two social workers that perform service coordination in highrise developments. Due to the fact that they are serving a number of developments, LSS office hours are limited in each building.

As was stated earlier, for many years, HACM only had one certified social worker who juggled responsibilities related to resident organization technical assistance with actual referrals for service. In 2023, when the social worker resigned, HACM made the determination that it would be more efficient to form a Resident Liaison section that could both provide that technical assistance and communication with resident organizations, as well as provide coordination of services and assistance to residents who need it. Referrals are made to the service coordinators (Lutheran Social Services staff) when a licensed social workers is truly needed. Resident Liaison staff can also assist when residents are having difficulties with communication with managers, or in reviewing or understanding their rent ledgers.

HACM continues to work with LSS to identify and apply for funding to fund service coordination. In addition, we are also looking for any additional partners that have resources and can assist in providing various services in our developments. Later this year, we plan to issue a Request for Proposal for Service Coordination services for 2025.

****

Topic #15: Garbage

Public Hearing Comment #35: From Bonnie Cooper, Hillside Terrace

I want to know in this Five Year Plan when is the timetable to get our building rehabbed or fixed, because our boiler is so old it's causing fire. Our basement is filled with garbage cans that are so dirty that when you go down there to do laundry, they have gone to the hospital due to what they are ingesting from the dirty garbage cans. They are not being disinfected. We took the Resident Liaison down there and still nothing has been fixed. People look at the outside of the building at Hillside, but they never go in the middle and see the rats, the roaches, the garbage cans. There are so many units and there's like 5 garbage cans for like 10 units. That's not acceptable and that's not enough, so where are people supposed to put the garbage. We have asked for more garbage cans for the development. Without them, people will put garbage on the ground which feeds the rats.

HACM Response to Topic #15 Garbage:

Although it was difficult to tell at first due to the amount of smoke, the fire was not from the boiler in the basement of the Hillside highrise. The fire was caused by a pile of leaves just outside the building that someone had started on fire and the smoke was drawn into the building through an air vent.

However, the boiler is getting older. Currently, the proposed amendment to the Capital Fund Program-Five Year Action Plan for 2023 to 2027 includes a line item for calendar 2025 for Hillside Terrace for heating and ventilation equipment as follows:

> HVAC replacement thoughout Hillside Development, including 2 new water heaters, 6 boilers for the family developments, 4 heating units at the highrise, and 3 air conditioning units at the highrise, for approximately $500,000

The rolling garbage dumpsters that are in the basement of the Hillside highrise are also older equipment. We will try to clean them once or twice a year with a pressure washer. If persons use garbage bags for their garbage disposal, it will help to decrease any contamination of the inside of the dumpster.

HACM has had discussions with the Department of Public Works (DPW) about additional garbage cans for Hillside Terrace. They had previously provided an additional 90 garbage carts, and HACM continues to work with DPW to see if we can obtain more We also have explored use of larger dumpsters outside, but that would not be feasible with the current infrastructure at Hillside.

Pest control actively goes to certain exterior areas where a number of complaints from rats have been reported, including Lapham Park, Townhomes at Carver Park, Hillside Terrace, among others. This typically happens weekly, and staff walk the grounds and treat for rats. Residents can do their part for exterior pests by not throwing garbage on the ground, by putting garbage in plastic garbage bags, putting the bags in the appropriate garbage can or dumpster (depending on the site), and fully closing the lid. Also, it is helpful if very young children are not sent out with the garbage, as they tend to leave the bags on the ground and not put them in the garbage can.

****

Topic #16--Radiators and Fire Safety

Public Hearing Comment #36: From Bonnie Cooper, Hillside Terrace

For the Hillside building, we have children and we still have radiators. Those are not safe. If a child touched that, that's a Child Protective Services case. No one is listening to that issue. These radiators are too hot for people that can't breathe, we have windows that can't even open, so if there is a fire in the building, we can't get out of the door, the only way we can get out is the window. How is the fire department going to get us out, people that can't go down the stairs?

HACM Response to Topic #16 Radiators and Fire Safety:

HACM follows industry standards and safety is our first priority.

In the case of radiators, they are used in housing around the country. Injuries could only be sustained with extended exposure- someone would have to maintain contact with the radiator to get burned. It is no different than a stove or oven. Our family units where the majority of our children live do have covers over the radiators. If the cover is missing, the resident should advise the property manager. Care must be taken to avoid accidents.

Depending on the type of development, HACM has windows that are designed to open and windows that are not designed to open. If windows that should open do not, or if the resident is not sure, the resident should put in a work order or inquire with the property management office. This would also be inspected during the annual unit inspection.

Sprinkler systems in HACM's high rises are visually inspected monthly (we are only required to inspect yearly) to ensure there are no leaks, broken gauges, or loss of pressure. We do a quarterly

flow test on each floor. We perform an annual test with more in-depth testing and inspecting of the sprinkler system.

****

Topic #17: Department of Neighborhood Services Inspections

Public Hearing Comment #37: From Bonnie Cooper, Hillside Terrace

I've reported all this to DNS and have gotten nowhere. This lady Jamie at DNS, she works for HACM. I want to know if that's a conflict of interest. You're working for DNS and you're also working for HACM. We're trying to get to the bottom of that.

Public Hearing Comment #38: From Charlene Bell, College Court

DNS is working with HACM; they're not helping us, so I want you to know that too. I told them all about my issues—about the mice coming out of the hole in the wall and that I almost broke my neck falling off the toilet. It did not get taken care of until the new manager came to the building. He showed me there was a note that the problem had previously been fixed. I told him that you see these pictures of the hole in my wall-does it look like it's fixed? They put mousetraps in my house to catch mice and I said I'm afraid of those mice, why are you putting these traps in my house? You're not fixing the problem, you're putting a bandaid on it.

HACM Response to Topic #17 Department of Neighborhood Services Inspections:

HACM wants to confirm to all HACM residents and to the general public that the inspectors that work for the Department of Neighborhood Services (DNS) are the employees of DNS. While they may be assigned by DNS to inspect HACM properties when requested, they are not employees of HACM. That is not true.

If DNS receives a complaint, they reach out to the complainant and schedules an inspection. When they perform an inspection, it can result in an order to the property owner (HACM) or it may be not verified if no violations are observed. If it is an order, DNS gives the property owner a due date as may be prescribed in the Milwaukee Code of Ordinances or DNS policies, depending on the type of repair/action. HACM must schedule a reinspection with DNS once the item has been resolved. If violations remain at reinspection, HACM may be find a reinspection fee. If an item remains in violation after the due date, the inspector may refer the order to Municipal Court for further enforcement.

****

Topic #18: Customer Service

Public Hearing Comment #39: From Albert Washko, Jim Luther New Hope Center

I am a board member at the Jim Luther New Hope Center, one of the largest food pantries in Milwaukee. We have overlapping interests with HACM as we serve many of the same people. We provide food insecurity solutions for our clients, many of whom are your clients. I'm a retired federal executive. I was with the VA Hospital system for over 30 years—at one time I was responsible for 23 VA hospitals. One of my responsibilities was to ensure that there was a good customer service orientation which is what public service is all about. It appears to me that listening isn't enough. I learned that the hard way over my thirty years. I've learned that good customer service requires dialog. It appears that this is missing as this turnout today and the lawsuit and the other turnouts reflect that there is a pretty serious communication problem. What is needed is a structure for dialog, a structure for community service dialog, and that means not only is there listening, but there is also feedback. I would be very happy as someone that has experience in that area to help you find models that will work for you. And I would be happy to help you as well and I can leave you my card.

Public Hearing Comment #40: From Charlene Bell, College Court

We have official people telling us "Those are our buildings, maam." These are your senior people, talking to us residents. They don't care. They were bringing a man through the building. I heard it was someone from HUD. But they said I could not talk to him as it wasn't my concern. I bet the camera crews want me to talk. I bet they won't ask me to be quiet. They have staff that do not know how to speak respectfully. That's one of the reasons the previous manager got attacked, because she didn't know how to talk to people. She spoke with me like I'm a kindergartener. I'm closer to 60 than I am 18. Go to the office--don't talk to me in the hallway.

HACM Response to Topic #18 Customer Service:

HACM's residents and participants are our customers, and HACM is committed to providing high-quality customer service. In the past year, HACM's Human Resources department has added specialist staff with a goal of establishing ongoing trainings in a variety of modalities for both new and existing employees. HACM has engaged staff – from its Rent Assistance Voucher offices, to the Property Managers and maintenance staff at its properties, from frontline staff to managers at all levels of the organization – in a variety of trainings, both industry-specific and with a focus specifically on customer service.

We also want to point out that HACM's 5-Year PHA Plan for 2025 to 2029 includes a number of objectives under Goal #4 that are specifically related to the goal of providing excellent customer service.

If residents feel that a staff person has provided poor customer service, HACM practice is to direct them to contact the supervisor of the employee in question, or alternately, to contact HACM's Human Resources department.

HACM shares Mr. Washko's appreciation in the value of genuine dialogue as well. HACM may reach out to Mr. Washko, as a potential partner in service to our residents, to explore models of dialogue between and amongst staff and residents.

HACM's residents and participants are our customers, and we expect all staff to provide excellent customer service. If HACM corroborates information that staff members are acting inappropriately, HACM will deal with it promptly in accordance with our personnel policies regarding employee conduct.

****

Topic #19: Retaliation

Public Hearing Comment #41: From Bonnie Cooper, Hillside Terrace

The management talks to residents very unprofessionally and rudely. We report matters to DNS with complaints, and then later management issues a violation. What is this for—is this retaliation?

HACM Response to Topic #19 Retaliation

HACM does not tolerate retaliation against a resident. If HACM corroborates information that an action taken by an employee was not justified by circumstances and policies and was instead retaliation, HACM will deal with it promptly in accordance with our personnel policies regarding employee conduct.

****

Topic #20: HUD Quality Assurance Division Report

Public Hearing Comment #42: From Kelly Glustott, Common Ground

I'm a community member and a volunteer with Common Ground. I have been an advanced practice nurse and served patients in hospice and palliative care. During that time, I have learned that no matter who a person is or where they live, their home is one of the most important things to them. There home is not just a place to close the door. Their home is somewhere where they can feel safe, security, clean, and a place that supports their best health. I now serve as a volunteer coordinator for a nonprofit that provides services to older adults, including Arlington Court.

I noted that in your Five-Year Plan, you did not discuss the progress you have made on the Quality Assurance Division Corrective Action Plan. As of the end of June, in fact, HACM reported that they had only closed 2 of 30 total findings. That's 5% progress. If I hired an employee or a volunteer and they performed only 5% of the corrective actions I made a year ago, they would be fired. Is 5% progress acceptable to you?

HACM Response to Topic #20 HUD Quality Assurance Division Report:

HACM has been responding to several Corrective Action Plans from the U.S. Department of Housing and Urban Development (HUD), including a previous one from the HUD Field Office related to the 2022 Monitoring Review, the new SEMAP Corrective Action Plan from the HUD Field Office, and the Quality Assurance Division Corrective Action Plan. Yes, it is true that a number of the recommended corrective actions have not been closed out.
However, one has to keep in mind that the majority of these corrective actions are in progress and by their nature are not a quick turnaround item. However, the end result and the impact on improvement of performance in will be long-lasting. The majority of the corrective actions are related directly or indirectly to the following actions that were required by HUD:

1. HUD required HACM to engage a financial management consultant/auditor to perform a forensic audit—a 100% review of all financial transactions for the five years from 2017 through 2022 related to the voucher program; ensure correction of any errors found; identify any items towards possible misuse of funds; and any variances must be researched, reconciled, corrected and prior period adjustments prepared for correction of the unrestricted net position (UNP) and/or restricted net position (RNP) balances.

   Note that HACM engaged CliftonLarsonAllen LLP (CLA, CPAs) to perform the financial records reconstruction/forensic audit. The firm assigned staff to perform the review to ensure timely completion. The work started in October 28, 2023 starting with the review of 2017 transactions and CLA has been continuing to work on the other four years of transactions. The work is in its final

stages and should be completed shortly. Once the 100% participant file review is completed, there may be additional impacts upon the UNP and RNP depending on corrections needed.

- YARDI had been implemented as HACM's housing software since August 2019 and as the financial/accounting software for the Housing Choice Voucher financial transactions since 1/1/2023. However, the use of a separate software system for accounting (Multiview) created some potential for errors or unreconciled differences. One of the corrective actions from QAD is that HACM work with YARDI to replace Multiview and to use YARDI as the financial accounting software enterprise-wide for HACM.

  This has been in process during 2024 with the goal to perform setup of the system and train staff, so that HACM can use YARDI as the financial software enterprise-wide by January 1, 2025.

- QAD required HACM to hire an independent third party contractor to perform a 100% participant file review for all participants in the voucher program, ensuring that the participant files are complete and correct; that the income, rent and other calculations are correct; that FSS updates related to the 50058 are correct; and that all corrections that are needed to Yardi or to the 50058 record are made by the contractor and track the necessary corrections to the record so that any needed changes are made in HUD's PIC and VMS systems.

  QAD also clarified in the final corrective action plan that the 100% file review should be completed concurrently with the contracting out of the HCV program administration/operation and be performed by the same contractor.

- As another corrective action, QAD required HACM to develop an RFP to contract out the management and operation of the entire Housing Choice Voucher program to an experienced contractor.

  The RFP was released earlier in the year with responses due by 3/8/2024. Evaluations of proposals including interviews and references have been completed and a recommendation is expected to be submitted for Board review and approval at their October 2024 meeting.

****

Topic #21: HVAC System at Victory Manor

Public Hearing Comment #43: From Rob Chernow, Common Ground

I was a field-commissioned Officer during the Vietnam War and when I came back, and I ran for a the Veterans Stand Down for homeless veterans and their families for several years. My question has a lot to do with Victory Manor which was a new project that was put up basically for veterans. Residents were using their ovens to keep warm last winter. What have we done to fix the issues with the air conditioning units at Victory Manor? Your senior staff originally denied this issue but then admitted it to the Journal Sentinel. They have provided the residents with space heaters. They have hired Southport Heating and Cooling to work in and out of the apartments to tinker with the system, but nothing seems to be fixed. This is not a way to honor veterans like myself and others who live there. And, where there appear to be conflicts of interest when the building was built, because when I was in the construction industry, the parties that were responsible for constructing the building would have been responsible for fixing the problems, and they weren't.

HACM Response to Topic #21 HVAC System at Victory Manor:

The Heating, Ventilating and Air Conditioning (HVAC) system at Victory Manor is a Variable Refrigerant Flow (VRF) system. It uses refrigerant liquid in a modified heat-pump system to provide both heating and air conditioning in the building. A main advantage to this system is that individual apartments can have heating or air conditioning at the same time. In other words, one apartment can be in heating mode and another can be in cooling mode. This can be especially important during "shoulder" months when temperatures can range between 40 to 70 degrees Fahrenheit.

Almost from the beginning of the occupancy of Victory Manor, there were problems with the VRF system. During the first year of occupancy, the air conditioning could not cool the building to the level the residents were requesting. During the subsequent heating season, there were issues with the level of heat being supplied to the building. The original HVAC contractor was continually working on the system to correct the issues. Many consultants were brought in to diagnose what was causing the problems. Unfortunately, it took much longer to determine a "solution" to the problems than anyone expected. In approximately 2022, the VRF system appeared to stabilize enough to provide fairly consistent heating and air conditioning for the building. Individual apartment units were still having problems but the "overall" system issues seemed to have stopped.

In 2023, more problems with the VRF system arose and both the original contractor and Travaux spent a lot of time trying to determine what was causing the problems. During visits to the apartments, it was found that the thermostats in many of the units had "locked out" and were

not functioning as they should. This was a primary cause of the individual apartment HVAC problems. At that time, it was found that some of the thermostat settings, which had been set with limitations on both upper and lower temperature limits, had been "hacked" to allow some of the apartment units to request heating over the set upper temperature limits. This was found at more than 25% of the units. It is assumed, someone "unlocked" the system to allow temperatures outside of the limits. In this unlocked condition, parameters within the thermostats were being set to a condition that fully locked the system and stopped it from working altogether.

In 2024, at the request of the residents, the investor, PNC Bank, engaged a third-party engineer to inspect the apartments. The inspection was completed in May – June, 2024. One of the basic results of the inspection is a suggestion to replace the thermostats with a "simpler" model that would allow the residents to adjust the temperature for comfort but would not allow access to the more sensitive parameters of the HVAC system. The initial attempt at replacing the thermostats did not work and alternative solutions are being investigated. Additional results of the PNC inspection are being reviewed at this time.

In conclusion, the HVAC system at Victory Manor can and has been supplying the required heat, 68 degrees Fahrenheit, to the building. There is no danger to the residents from low temperatures. We are attempting to develop a strategy to modify the HVAC system to provide more comfort to the residents in a safe and economical fashion.

****

Topic #22: Significant Amendments and Public Hearings

Public Hearing Comment #44: From Cornelius Sawyer, Highland Gardens

Are you aware that I asked for the removal of the million dollar threshold--- the requirement that you don't have to report anything that is under a million dollars? The exact time that they implemented this policy is when the performance of the housing authority declined from high performer to troubled. So, since they know that those two things coincided, they need to start reporting down to the micro-dollar what they are using money for.

HACM Response to Topic #22 Significant Amendments and Public Hearings:

Pages 31-32 of the Annual PHA Plan requires the PHA to provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. The definition was last changed in 2018 when it was updated by the HACM Board of Commissioners, after a review by the

HACM management and the Resident Advisory Board. Prior to 2018, HACM's policy on the definition of significant amendment and substantial deviation had not been updated in many years.

A significant amendment is a change in policy that significantly and materially alters HACM's stated mission, goals, objectives and activities as stated in the Plan. Significant amendments require a PHA to put out a public notice for a public hearing which can result in a delay in responding to an issue.

The significant amendment policy that was approved by the HACM Board of Commissioners in 2018 was that the significant amendment/public hearing process should not be triggered by minor changes in a capital budget or in minor wording changes. Rather, it should be reserved for items such as major changes or additions to a capital item, material changes to rent policies, admissions policies, etc., or major changes on demolition, disposition or conversion activities.

The speaker appears to be referencing the portion of the definition regarding certain capital fund items. The definition of significant amendment included items such as the addition of a capital fund project that is not included in the current 5-year action plan of over $1,000,000. This was an increase from the previous definition of $250,000. The determination was that a smaller change of $300,000 or $500,000 in the capital budget of $8 million annually did not appear significant enough compared to the annual or 5-year capital plan to require a public notice process for a public hearing before the Board of Commissioners. In addition, this larger threshold is not unusual for larger public housing authorities nationwide.

In addition, under HACM's Procurement Policy, any contract that is $250,000 or more would need to be approved by the Board, so the item would be discussed and voted on at a HACM Board of Commissioners meeting when an actual contract comes before the Board.

****

Topic #23: Resident Services and "Union-Busting"

Public Hearing Comment #46: From Cornelius Sawyer, Highland Gardens

The Housing Authority thinks I'm taking it lightly that they have staff members that have been union-busting resident organizations. Even though I have told staff in one instance the person is unreported. Because they took it so lightly, me and the other presidents that I work with, the request is termination of those two employees. The union-busting has got to stop. I want the board to really pay attention to this one because when we did the RO President's meeting with HUD, HUD said it is not allowed. If those employees want to keep their jobs, then you need to

speak with me about those employees keeping their jobs. I don't care how highly you perform, when your performance includes criminal actions against people and their rights, they have to go.

HACM Response to Topic #23 Resident Services and "Union-Busting":

Resident organizations or resident councils are independent entities separate from the public housing authority, and as such, they follow their organization bylaws as well as the overall regulations from HUD that govern resident organizations. A public housing authority such as HACM does have some responsibilities related to resident organizations that are outlined by HUD in the regulations, including: providing technical assistance and information to resident organizations; providing assistance in monitoring resident council elections in coordination with a third-party independent monitor; and funding resident participation annually, approving resident participation funding budgeted activities, and auditing the spending of the resident participation funds. HACM does not condone retaliation against any individual resident or resident organization. The Chief Operating Officer-Program Services will follow up with the speaker to get more details regarding the specific allegation.

****

Topic #24: Resident Organization Funding

Public Hearing Comment #46: From Cornelius Sawyer, Highland Gardens

I'm asking for money because in order for resident organizations to operate properly, each resident organization should receive an additional $10,000. I'm asking for that because it seems that every charitable organization in the city that wants to do something that HACM is happy with gets funding, except for the organizations that Housing has to work with—the resident organizations. Let's fund these ROs so that we can afford to get lawyers and do what we need to do to operate properly. we can do what we need to do and get lawyers and get funded properly. I'm trying to make things easier, especially for persons with cognitive issues, this will be my second time asking for accounting software for the resident organizations.

HACM Response to Topic #24 Resident Organization Funding:

HUD encourages public housing residents to be actively involved in their communities particularly through duly-elected resident councils. Resident councils work to improve residents' quality of life and support residents in creating a positive living environment in their community. To support resident participation, HUD provides funding to public housing authorities (PHAs) for resident participation activities and part of this funding is reserved for resident councils. This transfer of funds from the housing authority to the resident council and the related agreements, creates a partnership between the housing authority, resident council, and HUD.

In years when Congress provides sufficient funding, HUD provides housing authorities with $25 for every occupied, public housing unit for resident participation activities. Of this amount, $15 for each unit annually goes to the resident council and the other $10 can be used by the PHA to pay for costs related to resident participation. The PHA may choose to fund resident councils above $15 per unit each year. Funding can only be provided to a resident council through a written agreement between the housing authority and resident council. This resident participant funding is only for public housing developments or for RAD units that were converted from public housing in RAD developments.

In addition to the amount required by HUD, HACM has historically voluntarily included an additional amount of $3 per public housing/RAD unit in separate funding to Resident organizations.

Finally, while HACM would certainly like to be able to increase the amount of funding for resident organizations, we are unable to at this time due to by the number of other priorities that we need to fund, including but not limited to maintenance and repairs, public safety and all other operating costs from a limited budget.

****

Topic #25: Salary Levels and Comparability

Public Hearing Comment #47: From Cornelius Sawyer, Highland Gardens

As a RAB member, I'm familiar with the Section 3 program that housing authorities must follow, which promotes hiring residents to the greatest extent possible. Currently, HACM does not give a pension anymore. I've heard from people who are getting $10,000 less than what they are supposed to be paid. You can't pay someone significantly less than the median incomes for the jobs. And HACM says that they can't get people to work for them. Or they leave. Of course they leave HACM, because they are being paid $10,000 less than somewhere else. By helping people be successful, they can become homeowners. We need to get the salaries paid to these individuals higher that what is currently being paid so that it is equivalent to the median income.

HACM Response to Topic #25 Salary Levels and Comparability:

In 2017, HACM conducted a compensation study in partnership with Gallagher Benefits Services. The study allowed HACM to determine how to pay out employees, and retain current ones through fair salaries. HACM's objectives of the study were to:

- Conduct a comprehensive compensation study
- Market price benchmark jobs based on job content
- Ensure alignment with the external market

- Confirm jobs within HACM that are at a similar level of complexity and decision making are in the same grade
- Recommend implementation strategy for proposed changes

The project consisted included Job analysis and classification; job evaluation; compensation study and methodology; and recommendations/next steps. The study incorporated the following:

- Reviewed current systems to understand issues and needs
- Position description questionnaires were used to gather information on each job's duties, responsibilities, and decision-making level
- This information was used as the basis for creating the classification structure
- Use of the Decision Band Method Job evaluation methodology
- Use of market data from comparable organizations and the nearby geographic area
- Balance internal equity and market data to develop a salary structure
- Cost implementation options for the proposed salary structure

The Compensation Plan was presented to the Board of Commissioners in February 2017, so it is now seven years old. Like most organizations, HACM's Human Resources department will continue to review hiring concerns to see if there is needs to update the information in our compensation grading structure or in the ranges for each grade (low, mid, high).

****

Topic #26: Waiting Lists and Retention

Public Hearing Comment #48: From Cornelius Sawyer, Highland Gardens

The agency plan is too waiting list oriented. There is a mandatory 80% retention rate that is required. That does not exclude people that meet financial levels to leave out of housing. But when you have people leave housing to be homeless, there is a difference.

HACM Response to Topic #26 Waiting Lists and Retention:

It is in the best interest of landlords to retain good tenants. However, we are not aware of any requirement for a "80% retention rate", either by HUD or any other entity.

However, HACM agrees that resident retention is important, which is one of the reasons that HACM agreed with the RAB's previous comment and incorporated an objective in our 5 Year PHA Plan goals to it as follows:

f. In addition to being efficient in filling vacant units, HACM will continue work to improve resident retention and reduce move-outs. Resident retention is often improved by: (1) communicating timely and effectively with residents; (2) dealing with maintenance requests timely; (3) taking

actions with neighbors that are causing issues, and (4) working with residents to maintain street appeal and cleanliness.

****

Topic #27: Complaint Resolution

Public Hearing Comment #49: From Cornelius Sawyer, Highland Gardens

Hopefully in the future, you guys will be more receptive to these issues. As Commissioners, you do have the right to do certain things. When people have complaints to you guys, especially about the Executive Director or his staff, they should be vented. That is a conflict of interest. Let's get someone else in place to take these complaints, even if it's Common Ground—they're taking complaints anyways. Let the complaints go to them and we'll have better communication at these meetings.

HACM Response to Topic #27 Complaint Resolution

The Housing Authority of the City of Milwaukee (HACM) is committed to addressing resident complaints in a timely and effective manner. The process for handling complaints varies based on the nature of the issue. If site staff are unable to resolve a complaint, residents can seek further assistance from HACM's Resident Liaison division or request a formal grievance hearing with their property manager.

Below is a breakdown of the available options for different types of complaints:

EMPLOYEES & CONTRACTORS

For issues related to HACM employees or contractors, residents should file a formal complaint with HACM's Human Resources department.

PUBLIC SAFETY

Residents should contact the **Milwaukee Police Department (MPD)** for:

- Violent crimes or emergencies (e.g., assault, robbery, domestic violence).
- Serious or life-threatening situations (e.g., active break-ins, armed individuals).
- Observations of illegal activities (e.g., drug dealing, gunshots).
- Situations where there is a direct and immediate threat to someone's life or safety.
- Any criminal activity that requires a police report for legal or insurance purposes.

Residents should call 9-1-1 for emergencies and MPD's nonemergency line at 414-933-4444 for nonemergency matters.

Residents should contact **HACM's Public Safety Department** for:

- Suspicious behavior or activity within HACM properties.
- Non-violent disturbances or conflicts among residents.
- Security concerns or breaches in common areas.
- Non-emergency safety concerns like loitering or noise complaints.
- Requests for safety escorts or assistance within HACM property.

Residents can contact Public Safety for non-emergency assistance 24/7 by calling (414) 286-5100 or by submitting an online public safety concern form (the website is https://www.hacm.org/programs/public-safety-silent-complaint-form). Complaints may also be submitted anonymously.

PROPERTY CONDITIONS

If property management staff or their supervisor are not providing an adequate response, residents may escalate their concerns to the City of Milwaukee's Department of Neighborhood Services.

RENT / ACCOUNT DISPUTES

For rent or account-related issues, residents should first contact their property management staff, as they are most familiar with residents' accounts. If concerns are still unresolved, residents can reach out to a member of the Resident Liaison team.

SECTION 8 (RENT ASSISTANCE VOUCHER) PARTICIPANTS

Section 8 participants should reach out to the Section 8 (Rent Assistance) office at 414-286-5650 for issues related to their participation in the program. If a participant has an issue with the property they are leasing, they should first contact the landlord. If they are unable to get a satisfactory resolution, they should contact the Section 8 office.

FAIR HOUSING

Federal law prohibits discrimination in housing based on race, color, national origin, religion, sex, family status, and disability. Residents can file a fair housing complaint with the U.S. Department of Housing and Urban Development (HUD). Complaints to HUD can be filed online at https://www.hud.gov/fairhousing/fileacomplaint , by mail, or by calling (800) 669-9777.

If issues are not resolved through these existing processes, they may be elevated to the Board of Commissioners.

****

Topic #28: Contract with Nan McKay

Public Hearing Comment #50: From Nicole Binns, College Court

To address this consultant's thing—what are we consulting? Why do we have a five-year plan about consulting and what are you consulting for? Because we (the residents) need to be consulted about how we are treated, misrepresented and mismanaged at HACM. And ripped off. Why are we consulting? And who is Nan McKay—we don't even know her? That's my concern. And my concern is that we have to have more sympathy and empathy.

Public Hearing Comment #51: From Ann Ritchey, Common Ground

How much money have you paid Nan McKay in total over the past five years?

HACM Response to Topic #28 Contract with Nan McKay

Nan McKay and Associates, Inc. is contractor based out of California that has extensive experience in providing services to many public housing authorities for more than 40 years. Such services have included separate functions in public housing or housing choice vouchers, including direct program management, certification and recertification, inspections, technical support, performance improvement tools, call center services, operational and organizational assessments, training, and many other types of services.

Regarding contracts with Nan McKay, in early 2022, HACM was in urgent need for a new Independent Entity (IE) to provide certain HUD-required services for PHA-owned units, including but not limited to, determination of initial rent to owner and annual redetermination of rent to owner. HACM solicited pricing for a variety of services including these IE services from Nan McKay and Associates, Inc. in April 2022 and HACM submitted the selection of Nan McKay to the HUD local field office for approval as required by the regulations, and received approval from HUD. The original award was effective May 16, 2022 with an option to add four additional one-year terms upon mutual consent of both parties.

In response to the HUD Field Office recommendations from the September 2022 on-site monitoring review to increase outsourcing of certain functions, HACM amended the original purchase order with Nan McKay to outsource a portion of initial eligibility certification processing of applicants selected from the HCV waitlist, as well as a portion of annual recertification processing of HCV participants. Nan McKay has been completing the last of the assigned participant files that had been assigned to them for initial eligibility and recertification and we have terminated that portion of the contract services effective September 30, 2024.

At this time, they will still continue to act as an Independent Entity for certain actions that HUD requires an IE, such as rent determination for HACM-owned units.

The amount of the Purchase order with Nan McKay is currently a cumulative total of $650,000 for these services from 2022 to 2024. Once all invoices have been received from Nan McKay through 9/30/24, HACM may need to request Board approval for one final amendment of an additional amount between $50,000 and $100,000 for final payment for these services.

Topic #29: Process for the RFP for the Management and Operation of the Voucher Program

Public Hearing Comment #52: From Ann Ritchey, Common Ground

Everyone should have the opportunity to live in a decent place where they can be satisfied with their lives. In your five-year plan, you say you plan to hire a third party to do a 100% participant file review of all voucher files. Why are you planning to hire a for-profit company to do the job? Will you publicize the results of that review?

Public Hearing Comment #53: From Christlyn Stanley, Common Ground

I'm a member of Common Ground and a member of the community. As a public servant, we are called to do good, to seek justice and to correct oppression. Some of the things I heard today really makes my heart cringe. We have the responsibility to protect the rights of those we consider to be afflicted or destitute. Milwaukee is an awesome City and I think we have the resources to do that.

In your five-year plan, you say that you are contracting a third-party to manage and operate the entire Housing Choice Voucher program and that HACM will soon make the recommendation to the Board of Commissioners. How many candidates did you evaluate for the RFP? Who was a part of the evaluation team? How will you as the Board evaluate the recommendation that HACM staff put forth? Will you have a public meeting about the recommendations? How will you hold that third party accountable and how soon will the decision be made? We are substantially past our original RFP deadline, and participants are stressed and suffering because HACM's Section 8 office is so terrible.

HACM Response to Topic #29 Process for the RFP for the Management and Operation of the Voucher Program:

As one of the Corrective Actions required by HUD's Quality Assurance Division, HACM was required to solicit contractors through a Request for Proposal to manage and operate the Housing Choice Voucher program. In addition, another required part of the scope of work was a 100% participant file review of all voucher files over a period of time. These were required corrective actions in our Corrective Action Plan with HUD.

HACM worked on drafting the RFP and submitted it to HUD several times for their feedback and comments in an effort to ensure: (a) we were addressing all required items from the corrective action plan; and (b) that the list of services to ensure quality management of the program was comprehensive.

The RFP was issued on 1/19/24 and proposals were due on 3/8/2024. The RFP did not specify that a Respondent to the RFP had to be a for-profit company; it could be a qualified for-profit, not-for-profit, or a public housing authority. The language in the RFP was:

> "The Housing Authority of the City of Milwaukee (HACM) intends to enter into a contract with a highly-qualified professional consulting and management firm or a highly-qualified public housing authority to manage and operate all of the key functions of HACM's entire HCV program."

Six proposals were received by the closing date of the RFP:

1. AMA Consulting Group, LLC (AMA), Lake Mary, Florida
2. CVR Associates, Inc. (CVR), Tampa, Florida
3. Milwaukee County Dept. of Health & Human Services Housing Services, Milwaukee, WI
4. Nan McKay and Associates, Inc. (Nan McKay), El Cajon, CA
5. Pivotal Property Management MKE, LLC (Pivotal), Milwaukee, WI
6. Quadel Consulting and Training, LLC (Quadel), Indianapolis, IN

A recommendation for selection of the contractor is tentatively scheduled to go to the HACM Board of Commissioners for review at their October 2024 meeting and additional information about the selection process and recommendation will be available at that time.

Regarding the 100% participant file review, the results of the review will be submitted as required to HUD. While details that may contain personally identifiable information may need to be redacted, summaries of the overall results of the review will be available as part of responses to our Corrective Action Plans.

****