# RAB Comments on HACM's 2026 Annual Agency Plan, Admissions and Continued Occupancy Policy, and Administrative Plan

## 2026 Annual Agency Plan

1. **Public Hearing Comments:** When will the comments and feedback that are made at the September 2025 public hearing be reviewed by the RAB? It will also be helpful if the RAB members attend the public hearing so that they hear the comments in person.

   **HACM Response:** HACM will work to summarize the comments made at the 9/10/2025 public hearing and the HACM responses to those comments within a couple weeks after the hearing. This is with the intent that they are ready for RAB Board review at the September RAB Board meeting on Wednesday, September 24, 2025.

2. **Reallocation of VASH vouchers for Veterans:** Can we discuss at one of the upcoming meetings the desire for HACM to reallocate some VASH Vouchers from HACM to WHEDA as was mentioned at the last Board of Commissioners meeting?

   **HACM Response:** We will add to the agenda on one of the upcoming RAB meetings.

3. **Waiting List for Becher Court (page 13 of 58):** Why does the waiting list information list two-bedroom units at Becher Court?

   **HACM Response:** The reason is that there is one two-bedroom unit at Becher Court (out of the 120 units at Becher Court) that was created as part of a renovation that was done years ago. As you see, there are over 1,500 households on that 2-bedroom wait list, it will be a long wait for many of the persons for this one unit.

4. **Waiting Lists (page 4 of 58):** I don't see a waiting list for Lincoln Court. Don't they have a waiting list?

   **HACM Response:** Lincoln Court is a public housing development. All public housing developments have a combined wait list and households are selected by bedroom size. Once they are selected off the wait list, they will be offered those developments that have ready available units at the time that they are being processed.

   Housing authorities can submit an application to HUD for approval to have site-based waiting lists (one for each public housing development). HACM will consider the pros and cons of a site-based waiting lists for the future.

5. **Grievance Policy (page 21 of 58):** To clarify, you mention that a staff person will act as the Chairperson of the Grievance panel. Are you talking about a HACM staff person? Speaking as a resident, I believe that many residents have a distrust of a HACM staff person being the chair of the panel. Also, I've spoken to the State Bar---they were not aware of the RFP that had been issued to look for attorneys to serve as a hearing officer. Did the RFP specify the fee they would be paid? A second RAB member also questioned the impartiality of a HACM staff member. However, a third member of the RAB Board felt that it was not an issue for a HACM staff person independent of the decision to be the Chair of the Grievance panel, especially if it saved money at a time when the Housing Authority needed to save money.

**HACM Response:** As the RAB Board knows, HACM's existing Grievance Policy required an independent attorney to act as the Chair of the Review Panel. In early 2024, HACM issued and advertised an RFP for Hearing Officer Services, that sought attorneys that could act as a Grievance Hearing Officer. It outlined the scope and requested as part of the response that they identify their proposed billing rate (either for a per-hour basis or a per-case basis). There were no responses. In addition, while it was not advertised with the State Bar, HACM's City Attorneys also reached out to attorneys in the area to promote the opportunity.

Given the response, we had proposed using HACM staff persons that knowledgeable but are independent of the original decision who could serve as the Chair of the Review Panel.
This is what many housing authorities nationwide do for grievance hearings. Also, please keep in mind that two of the three votes on the Review Panel who would review a grievance case would be public housing residents selected from a pool.

However, in response to the RAB member's comment and to provide the policy with more flexibility so it will not need to be modified again in the near future, HACM has modified the proposed Grievance Procedures to include the possibility of the Chairperson of the Review Panel be either an employee independent of the original decision or a contractor. See Article III (A)(2) of the "Resident Grievance Procedures for Federally-Assisted Public Housing" for more details. It is anticipated that at first, the chairperson may be a staff person who has taken hearing officer training while we examine the possibility and cost of hiring an outside hearing officer.

There is also language in the procedures that HACM will endeavor to appoint a member to the position of Review Board Chairperson who has experience in conflict resolution, property management, administrative hearings, and who has specific prior experience with the Public Housing program.

The goal is to ensure that any of the three members of a Grievance panel, whether they are the panel chairperson (staff or contractor) or a public housing resident member of the panel, have the ability to be impartial and to listen to the evidence and weigh the decision based on the evidence presented.

6. **Section 32 Homeownership (page 22 of 58):** You are speaking about sale of vacant units in HACM's scattered sites. If so, please make sure that former residents were not forced out of their homes by HACM. With us not having a grievance policy in place for the last few years, it should be reviewed why the units are empty first. Also, why do you have informal settlement meetings between the resident and the management? Who can a resident bring as sometimes they are a senior or disabled person and may need assistance? Are you using a trained outside mediator?

**HACM Response:** Most of the scattered sites units are currently occupied so are not vacant. There is a HUD requirement for informal conference between property management and resident to see if the issue might be resolved without a grievance hearing. The resident can include anyone in the meeting that they want to bring. If the resident is not satisfied with the outcome of the informal meeting, they can request to continue to the grievance hearing.

Any grievance hearings that have been requested have been tracked and put to the side until we have final procedures for the grievance panel to proceed. If someone has requested a grievance hearing (assuming it is an action that can be grieved), no negative action is taken against the household until the grievance hearing is held. HACM currently has 13 outstanding requests awaiting a grievance hearing.

7. **Section 8y Homeownership (page 22 of 58):** What income limits apply if that person is buying with someone?

   **HACM Response:** If that person they are purchasing with is part of the household, the income limits on household income mentioned in this section apply.

8. **Scholarships (page 23 of 58):** What is covered by the HACM scholarship?

   **HACM Response:** Residents can apply for the scholarship if they are accepted into post-secondary school (college, technical college, etc.) The application should be submitted to Nannette Ray, Resident Services Manager.

9. **Family Self Sufficiency program (Page 24 of 58*):*** One resident asked if the nonprofit SET Ministry used to manage this program.

   **HACM Response:** The answer is no. SET Ministry staff did perform overall case management in some developments such as Parklawn during the HOPE VI grant from 1999 to 2004. The FSS program is managed by HACM staff under the Resident Services Manager, Nannette Ray.

10. **Resident Services (pages 22 to 25 of 58):** Can we put out info on who to contact for each program?

    **HACM Response:** That information is in the draft Resident Handbook and we will ensure it is also on HACM's website, though it does change from time to time.

11. **Section 3 program (pages 24-25 of 58):** Who does one contact regarding Section 3?

    **HACM Response:** You can contact Megan Shaw, the Contract & Compliance Officer at (414) 286-5881 or Megan.Shaw@hacm.org .

12. **Security Cameras (Page 27 of 58):** I believe that HACM was going to install a camera on the patio to cover the garden at Riverview. Did this get done?

    **HACM Response:** The garden area is currently visible on camera.

13. **Choice Neighborhood:** What is Choice Neighborhood program?

    **HACM Response:** This is a grant program from HUD that helped to fund the revitalization of Westlawn. Choice Neighborhoods awards competitive grants to redevelop severely distressed HUD housing, catalyze investments in the surrounding neighborhood, and improve the lives of residents of the HUD housing. To this end, Choice Neighborhoods is focused on three core goals:

    A. Housing: Replace severely distressed public and HUD-assisted housing with high-quality mixed-income housing that is well-managed and responsive to the needs of the surrounding neighborhood.

    B. People: Improve the lives of residents living in the target housing related to their income and employment, health, and education outcomes; and

    C. Neighborhood: Create strong, safe, and sustainable neighborhoods by investing in physical improvements which attract private investment, spur economic development and improve amenities and services for residents.

14. **Mixed Finance Development (page 32 of 58):** Can you make it clear that in the next time you do a low-income housing tax credit development, that if you have 200 original units and only replace 175, you can make up the amount lost.

    **HACM Response:** Many HUD programs (such as Choice Neighborhood) now require a one-for-one replacement of existing subsidized housing units. If there is such a loss, yes, HACM can utilize excess public housing capacity under the Annual Contributions Contract. This is called the "Faircloth Limit". Goal 5 under page 42 of 58 mentions that If opportunities arise, HACM may utilize its excess ACC units – (under the Faircloth 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.

15. **Disposition of Vacant Lots (page 33 of 58):** There is a vacant lot behind my house. Is this part of the list of vacant lots for disposition?

    **HACM Response:** The lost behind your house is in Westlawn Gardens. We did not include vacant lots in the Westlawn campus in this list. Part of the issue with lots that were reserved for market-rate units at Westlawn is that they currently do not pencil out---in other words, the cost to build rental units or homeownership units there is more than the appraised cost of the completed property. Without a funding source to subsidize, the development cannot currently be done until property values rise or construction costs decrease.

16. **Disposition of Vacant Lots (page 33 of 58): The section states we are exploring disposition to the City of Milwaukee? Is that the only entity we can sell to?**

    **HACM Response:** The section states, "HACM is exploring the potential sale/disposition of these lots back to the City of Milwaukee or to some other entity or various entities." In other words, we are exploring what makes sense. For example, if it is a small lot that no one can build on, can we sell them to an adjacent landowner? Or to the highest bidder?

17. **Disposition of Scattered Sites (Page 33 of 58): Are there any scattered sites available for leasing?**

    **HACM Response**: If we do sell, we will go through the formal disposition process. If we want to continue to rent, we lease them to persons selected off the appropriate waiting lists.

18. **Rental Assistance Demonstration (RAD) program (page 34 of 58): One of the RAB members requested information on RAD and how the program works.**

    **HACM Response**: The RAD program is a very complicated program that housing authorities can use to convert public housing developments to developments that use project-based vouchers as the form of subsidy. Ken Barbeau will share information regarding the RAD program with any RAB member or members that wish it.

19. **Housing for police officers (page 34 of 58):** One RAB member thought it worked okay in the 1990s in Parklawn.

    **HACM Response:** While this has not be used since the early 1990s, Ken Barbeau had heard it did not have a significant effect on crime rates or safety. Therefore, HACM ended the practice of setting aside units for a Police Officer in the late 1990s, and went back to using those units to house low income families.

20. **No smoking policies (page 35 of 58) :** Is no-smoking in Parklawn? I would think freedom of choice is violated?

    **HACM Response:** Yes, HUD changed regulations several years ago to require it in all public housing properties. It is legal for landlords to ban smoking in properties. We also extended it to our low income housing tax credit developments, though not to Northlawn, Southlawn, or Berryland.

21. **Goal 2 and 3 regarding Recertifications (pages 37-40):** One resident asked if the problems with recertifications have improved, because she heard that several months ago it was way behind schedule. She also had heard that you can't walk into the office more than one day a week.

    Another resident in public housing pointed out that during the month, the recertification person comes to assist residents that need assistance.

A third resident pointed out that there used to be a computer at the Parklawn office that was used by residents but they took that out recently and another pointed out that the computers at Lincoln Court were having issues.

**HACM Response:** While the public housing recertifications are mostly current, the recertifications for the HCV/PBV programs continue to fall behind. There are currently over 2,000 late recertifications in the program. These numbers need to improve prior to the end of the year.

CVR Associates that manages the program has reported to the HACM board that they have experienced higher staff turnover than was originally anticipated and they are still recruiting/hiring/and training staff to be up to full capacity. CVR has enhanced their staffing with six additional staff for now that have been assigned to Milwaukee. They project that the number of late recertifications will decrease within the next two to three months.

The CVR office hours will change on 8/18/2025 to Monday through Friday 9:00 AM to 4:30 PM. CVR's team continues to hold lab hours each Wednesday for applicants and participants to receive in-person assistance in morning and afternoon sessions. On average, 20-25 persons are assisted in each session. The main reasons for assistance include:

- Rent Café credential resets
- Assistance in completing the annual recertification process

CVR also continues to offer an additional lab day on Fridays for the PBV waiting list eligibility pulls to assist these applicants with their online applications in an effort to increase the volume of responses.

CVR is exploring ways to further its operations and tracking of in-person assistance requests, including using a tablet for visitors to check in, noting the reason for the visits and tracking times for visitors to be seen and will continue to identify additional areas of opportunities to enhance customer service further.

HACM's IT Department has been requested to work with property management at Parklawn to re-install the computer in the Parklawn management office for resident use and to look at and maintain the computers at Lincoln Court. In the meantime, public housing residents can also get assistance from staff at the Leasing and Compliance office at 5125 W. Lisbon Ave.

Finally, HACM will request a presentation from CVR at one of the upcoming RAB Board meetings.

22. **Make Your Money Talk (page 44 of 58):** A RAB member asked if it is possible that WWBIC could look at making exceptions to persons taking advantage of the IDA program more than once if it was over a certain number of years ago (e.g., > 10 years ago)? It was also pointed out that some individuals that wanted to start a business might have been impacted by COVID so deserve a second chance. In addition, he stated that many businesses went under during the economic stresses of COVID and many potential homeowners were unable to purchase homes during those years.

**HACM Response:** If a resident previously completed the training and opened an IDA, saved and qualified for and used the matching amount, previously we do not believe the resident would be eligible for a second IDA match.

However, if they were unable to use the match the first time or did not open an IDA account the first time, they could complete the training again and save and if they use their IDA for an approved purpose, receive the match this time. HACM's understanding of the current policy of Make Your Money Talk is that a resident cannot receive a matching amount twice. This was originally done so that the funding impacts the widest group of residents/participants.

However, there was significant disagreement from RAB members regarding whether that WWBIC policy is still in place. HACM will follow up with RAB to verify the current policy on this question. Additionally, HACM and WWBIC meet each year to look at changes or potential changes, and we will discuss with WWBIC the pros and cons of opening the IDA match up for a second time, under certain conditions, if they had received match dollars previously. We will inform the RAB and residents on any updates to this.

23. **2022 Audited Financial Statements (page 45 of 58):** Why isn't the amount of unpaid obligations from HACM to the City of Milwaukee listed in this audit?

    **HACM Response:** Because those unpaid obligations were not identified until 2025. Therefore, at the time that this audit report and the internal control and compliance issues were provided in the 2022 audit, they were not known. Those changes will all be incorporated into the beginning balances as of 1/1/2023 and will be part of the 2023 and 2024 financial statement audits.

24. **Troubled Status (pages 48-49 of 58):** One RAB member asked why prior staff inappropriately used funds for one program to pay for costs in another?

    **HACM Response:** Ken Barbeau responded that instead of making hard decisions about cutting costs or delaying some phases of Westlawn revitalization so that the budget could be balanced, they put off those decisions. That meant that they had bills that had to get paid. Perhaps they thought they were borrowing it and they would pay it back at some point. It does appear there was an attempt to reimburse the program for $100,000 at one point in time. However, the rest of the money that was taken from the voucher program was not paid back and HACM still owes that and will be paying it back to HUD.

25. **Monies owed to HUD (pages 48-49 of 58):** Another RAB member asked when we talk about paying HUD back for it, why is it not just put back into the HACM program by HACM.

    **HACM Response:** These funds were from the Housing Assistance Payments for the voucher program, which is subsidy paid to landlords. HUD continually pays a housing authority for the amount of funding it appears to need. That means that HUD funded the bank account for these amounts during the years they were misused for different program costs. Thus, HACM actually needs to pay HUD back for this amount, and not just put it back into the HACM Housing Assistance Payment bank account. It will be used by HUD

for the voucher programs at housing authorities nationwide. This money will probably be paid back over a longer period of time but will be determined by HUD so that it is an amount HACM can afford.

26. **RentCafe Log-ins:** Why do persons have two different log-ins into the system? For example, I have an HCV voucher at a tax credit development but they gave me two different log-ins.

    **HACM Response:** We believe this is because one log-in is for the voucher program recertification and the other is for the low income housing tax credit recertification. These two programs are in two different housing modules in YARDI Voyager software, and I believe that that requires two different accounts in the RentCafe System. However, we will check into this question.

27. **Inspections:** Is YARDI fully functional on work orders?

    **HACM Response:** Yes, we believe the RentCafe Portal is fully functional for submission of work orders, both in public housing and the affordable housing (tax credit).

## Admissions and Continued Occupancy Policy (ACOP)

28. **Introduction:** HOTMA changes and delays---One RAB member asked if these changes to the public housing Admissions and Continued Occupancy Policy (ACOP) we are discussing that are related to HOTMA are changes that are required by HUD.

    **HACM Response:** The answer for this year is yes. There are future HOTMA changes in which Housing Authorities may have decisions to make on how to implement the changes, but most of the changes for this year are required changes.

29. **Chapter 3-Eligibility:** Is there a definition of adult dependent?

    **HACM Response:** They used to use the term "dependent under the age of 18" and now that is called a minor. They have kept the word "dependent" and it defined as a person under the age of 18, or a person of any age who is a person with a disability or a full time student, except for the following persons who can never be a dependent: head of household, spouse, cohead, foster children/adults, or live-in aide.

30. **Chapter 3-Eligibility**—this definition of dependent—does it include an emancipated minor?

    **HACM Response:** An emancipated minor would not be a dependent of anyone—that is the reason they are emancipated.

31. **Chapter 4: Applications/Waitlists/Selection:** Are the public housing preferences eligible now or in 2026 (i.e., for VAWA emergency transfer and for a HAP contract terminated after an abatement in the HCV program and unable to find housing within the allowed time for the voucher term):

**HACM Response:** The request for VAWA emergency transfer preference was always in use, although this adds specific language. We believe this is eligible immediately as it has been in place.

The change for a preference in public housing if a HAP contract was terminated for failing inspection and being abated if the voucher participant could not subsequently locate a unit for their voucher is not listed as one of the HOTMA items required to be effective 7/1/2025. Therefore, we believe it will be effective once the Board of Commissioners and HUD approve the changes, probably as of 1/1/2026.

32. **Chapter 6, Income and Rent Determination:** Do they go by state or federal minimum wage? Does it matter if the employer counts you as full-time or part-time?

    **HACM Response:** They count whatever gross (not net) wage the person earns. AS a student, the school would need to determine if you are a full-time student. It has nothing to do with full-time employment. Only the amount over the amount of the dependent deduction would count as income for rent purposes.

33. **Chapter 6, Income and Rent Determinations: Federal financial assistance for a student:** One RAB member asked if this would be done for the month.

    **HACM Response:** It would probably be looked at for the year as most financial assistance is granted for a school year.

34. **Chapter 6, Income and Rent Determinations, ABLE Accounts:** One RAB member wanted the others to know that ABLE accounts can also assist someone in purchasing a home, up to $100,000.

    **HACM Response:** We are not sure the details on this, but the amount of the ABLE account is excluded from household assets for purposes of income and rent determination.

35. **Chapter 7, Verification, Fixed income sources**: The language seems to state that if you have statements within the benefit year for fixed income sources like Social Security or SSI, that those are acceptable. Is that correct?

    **HACM Response**: Yes, if one can submit a statement or benefit letter that shows the amounts received for a fixed -income source, those documents are acceptable and you would not be required to submit a new one.

36. **Chapter 9, Reexaminations, Over Income Households**: One RAB member asked to confirm that the first year that a public housing household becomes over income, they would not be terminated.

    **HACM Response:** Yes, that is correct. A household would receive a notice when they become over-income, then another notice at 12 months later, and a final one 24 months later, assuming their over-income status has not changed.

37. **Chapter 10, Pet Policy:** I understand that in the building that I'm in, there are approved pets as well as assistance animals. However, someone's dog occasionally poops in the hallway or elevator and it is not cleaned up. We need to do something on that. And another resident has a big pit bull –why do we allow that? Another RAB member suggested what they do in some suburbs about testing for the dog's DNA.

    **HACM Response:** When we originally developed the assistance animal policy for HACM, we originally did not allow certain breeds, such as pit bulls or rottweilers. While we can follow City of Milwaukee policy that bans those breeds for a dog that is a pet, our attorneys pointed out that for approved assistance animals, we cannot ban specific breeds. So, the determination was that we can ban breeds or dogs over a certain weight as a pet, but not as an assistance animal.

    Regarding disposal of an animal's waste, the rules for both pets and assistance animals is that an owner is responsible for cleaning up a pet's waste, whether that is indoors or outdoors. If we can prove that an owner has not taken care of that, we can give the resident a notice of lease violation. The difficulty is always in proving whose dog or animal the waste belongs to. Sometimes we are lucky and can catch it on security cameral or there is a witness.

    Unfortunately, the Housing Authority does not have the resources to do DNA funding for pet waste.

38. **Chapter 13, Lease Terminations, Over-Income Households:** One RAB member asked if this is in all the housing programs.

    **HACM Response:** No, these over-income limits only apply to public housing households.

    For the rent assistance voucher program, if a household's income is such that there is zero Housing Assistance Payment (HAP) or subsidy needed, and that situation continues for 180 days without change, then the person's voucher is terminated. That is a different rule than this one for public housing, however.

39. **Chapter 14, Grievances and Appeals:** One resident stated that if it ended up being a staff person, that it should be their full-time job doing grievances. He also suggested that when there are letters that go to resident leaders in public housing to be in the pool for the grievance panel, that it also be advertised on the view screens in housing developments and in newsletters as well.

    **HACM Response:** Currently, there are not enough public housing grievances for this to be anyone's full time job. If the number of cases increases, however, we will adjust hours accordingly. We will attempt to spread the word broadly using different methods to promote this opportunity to public housing residents who wish to serve on grievance panels.

## Administrative Plan (Voucher program)

40. **Chapter 8, NSPIRE: Life-threatening Deficiencies:** A RAB member from Riverview stated that heating is not always working properly at the beginning of the heating season.

    **HACM Response:** If a resident feels that they are not receiving heat in their unit, the resident should report in a work order so that the HVAC can be inspected and fixed if necessary.

41. **Chapter 8, NSPIRE: Inspections:** One RAB member saw that a housing authority in Texas got in trouble for allowing property managers to accompany the HUD NSPIRE inspectors.

    **HACM Response:** We do not believe there is a prohibition on the manager accompanying the inspectors. Often, HACM staff need to let the HUD inspectors into the unit and be ready with the key. Also, after the inspection, HACM needs to repair any violations that were noted, so it is helpful to accompany the inspectors so that the maintenance staff know what needs to be done to repair the violation.

42. **Chapter 8, NSPIRE: Inspections:** How long should a resident go without a locking door?

    **HACM Response**: If an exterior entry door does not lock, it needs to be repaired or replaced within 24 hours, or the problem needs to be abated. For example, a temporary door may be installed until a permanent door can be installed.

43. **Chapter 18, RAD PBVs:** One member asked if in a RAD/Section 18 blend, if Section 18 was like market rate rents?

    **HACM Response:** Good question. Not quite. In RAD, the units convert to a RAD Project-based voucher (PBV), which could be lower than a normal PBV rent. In Section 18 units, the units could convert to a tenant-protection voucher rent, which could be higher than a RAD PBV rent. It is not quite a market rate rent, but it could be higher than a RAD PBV rent.

44. **Chapter 18:** If I wanted to request a tenant-based voucher and wanted to move, how much would the voucher be worth?

    **HACM Response:** Right now, HACM is under "shortfall" and so we cannot issue tenant-based choice mobility vouchers.

    But, to answer your question, there are two factors in play with that. There is a payment standard that is based on rates set by HUD for the metropolitan area. In addition, HACM sets small area fair market rents in 15 zip codes in opportunity areas to make it easier for families to move to those areas.

    However, once you locate an apartment, the rent that HACM would pay is also limited by something called rent reasonableness. We need to ensure that the rent charged by the landlord is reasonable for similar units with similar amenities in that general geographic area.

For example, in the general Milwaukee metropolitan area, the payment standard set by HACM for a 2-bedroom unit is $1,382. But, depending on rent reasonableness, HACM might also limit the amount of rent paid to the landlord to a reasonable rent amount lower than $1,382.

45. **Moving and Inspections:** How long does it take to do an inspection of a house?

**HACM Response:** Typically, once we have received a Request for Tenancy Approval, an inspection should be done within 15 days of receiving the RFTA.