



Third Program Year 2012 Action Plan City of Milwaukee, Wisconsin

The CPMP Third Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Community Development Block Grant program was established by Congress in 1974 with the passage of the Housing and Community Development Act. This program provides funds to municipalities and other units of government around the country to develop viable urban communities. This is accomplished by providing affordable, decent housing, a suitable living environment and by expanding economic opportunities principally for low and moderate income persons. Local units of government develop their own programs and funding priorities, however all activities must be consistent with one or more of the following HUD national objectives:

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

As a Participating Jurisdiction (PJ) and entitlement community, the City of Milwaukee-Community Development Grants Administration (CDGA), receives annual funding allocations from the Federal government to fund activities to address these National Objectives.

As a recipient of these funds, the City of Milwaukee is required to submit to HUD each year, an Annual Action Plan, which is based on the jurisdiction's 5-Year Consolidated Plan and Strategy, that defines the direction the City will take in utilizing these Federal funds to address the national objectives in a manner that will produce the greatest measurable impact on our community.

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

The new HUD statutory program goals are:

DECENT HOUSING - which includes:

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

A SUITABLE LIVING ENVIRONMENT - which includes:

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

EXPANDED ECONOMIC OPPORTUNITIES- which includes:

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

The new long-term outcomes linked to these goals are:

- **Availability/Accessibility** – This outcome relates to programs that make services, housing, infrastructure, public services, or shelter accessible or available to low or moderate income persons, include those with special needs and/or disabilities.
- **Affordability** – This outcome relates to programs that provide affordability to low or moderate income persons and can include affordable housing.
- **Sustainability** – This outcome relates to programs that improve communities and promote viability such as removing slum and blight or other services that sustain communities.

For the most part, this Annual Action Plan is focused on how to best spend Federal HUD dollars. There is little discussion on the need for quality schools, government expenditures for human services or on the role of personal responsibility for life decisions, which impact economic viability. While those are all key issues, they are not within the scope of this Plan for the City of Milwaukee's use of Federal funds. The City of Milwaukee, Community Development Grants Administration will continue to strive to address the needs of Milwaukee's residents, while promoting programs and activities that will provide the greatest benefit for our community.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the proposed programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding.

The strategies and recommendations outlined in the document attempt to balance the needs and priorities of our community and as identified in the data analysis, with the availability of funds.

Summary of Community Needs/Strategies/Goals

The City of Milwaukee Community Development Grants Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent housing and economic opportunity for all community residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and social service providers. These priorities represent a comprehensive approach to neighborhood vitality, housing availability, affordability for all residents and adding value to the community.

To achieve these goals, CDGA will continue planned aggressive blight elimination efforts, support active citizen participation in monitoring problem properties and organizing efforts to improve quality of life and encourage the economic integration and revitalization of neighborhoods. Other priorities include integrating crime prevention into a variety of city services and capital improvements, continuing the city's aggressive efforts to combat lead hazards and continuing to support City workforce development for low income residents.

The City's Anti-Poverty Strategy emphasizes jobs and job creation. City departments will continue to utilize a variety of tools to work cooperatively with the non-profit sector and the business community to leverage employment and economic activity in targeted areas of the city and to spark broader policy and programmatic reform to focus on jobs.

The City's Economic and Community Development Strategy compliments its Anti-Poverty strategy by emphasizing the interrelationships and the need for the expansion of opportunities in the areas of education, employment, economic development and housing. In terms of targeting resources, Milwaukee will continue its commitment to cluster developments and large impact developments. This strategy has expanded to include cluster developments such as evidenced on North Dr. Martin Luther King Jr. Drive, West North Avenue and the area around South Layton Boulevard. In this vein, there is a growing sense that public and private sector funding should be focused more on tangible outcomes leading to neighborhood revitalization and the creation of jobs, income and wealth.

This model of comprehensive planning is embraced by the residents and other stakeholders as the emphasis is focused on housing improvement, job creation and income enhancement.

The City of Milwaukee's Housing Strategy includes expanded homeownership opportunities and access to affordable housing for all residents, the elimination of blighted structures, the sale of vacant lots, property surveys, housing rehabilitation and new housing construction for sale to owner-occupants and affordable rental housing for large families, persons with special needs and the elderly. The City also proposes to repair owner-occupied structures and substantially rehabilitate units for eventual homeownership.

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

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

Persons with special needs as well as the homeless are an important concern for the City as they strive to bring value to neighborhoods. The Milwaukee Continuum of Care's 10 Year Plan to End Homelessness, details the strategies, goals and action steps to be undertaken and priority needs and allocation priorities as determined by the Continuum of Care (CoC) Planning group. Some of the specific goals of this group include, coordinating the expansion of permanent housing and supportive services options, increasing access to permanent housing and enhancing current data and information systems.

Additionally, the City places an emphasis on addressing the needs of the mentally ill and veterans, youth issues such as dropout rates, recreation, educational programs and overall unemployment issues. Housing and supportive services for persons with Aids and other disabilities are another priority for the City of Milwaukee as well as continuing to address poverty and other issues facing residents and other stakeholders.

Lead-based paint hazards and their abatement continue to be a high priority for the City of Milwaukee. To that end, the following strategies will be utilized including: continuous evaluation of lead abatement methods, continuation of a program of grants/loans to assist homeowners and landlords in removing lead hazards, continuing collaborative efforts with other housing programs to identify lead abatement and lead hazard reduction into total housing rehabilitation, expanding education and training for homeowners, landlords and tenants regarding lead poisoning prevention and securing city, state and federal funding to finance lead hazard reduction activities.

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

The City continues to support efforts to strengthen Milwaukee's communities, including programs such as community organizing (block club creation and support), crime prevention, neighborhood cleanups, and landlord/tenant programs.

The Community Development Grants Administration continues to promote policies and employ strategies to promote fair housing and fair lending to help remove barriers to affordable housing. To this end, the City continues to approach planning and program development efforts in a comprehensive manner with the goal of increasing jobs and household income. The City will also continue to investigate programs and support initiatives which assist in removing barriers to employment for low income households, i.e., walk-to-work programs and access to programs that provide wrap around social, educational, employment and lifeskills services. Funding allocations are designed to use a comprehensive approach to reduction of barriers by increased funding to a number of agencies that both target increased employment opportunities, expanded homeownership and quality, affordable rental housing in Milwaukee.

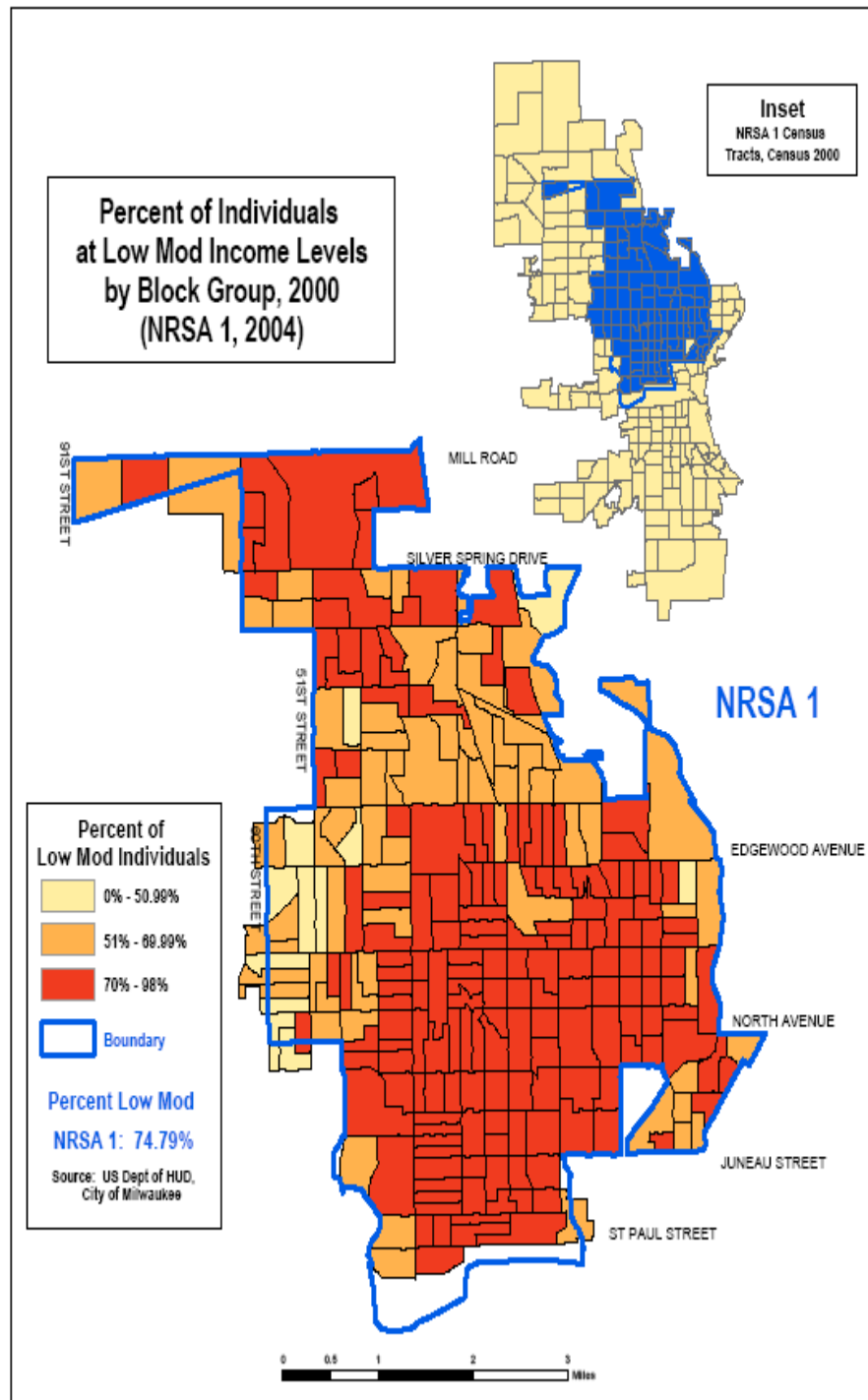
GENERAL QUESTIONS

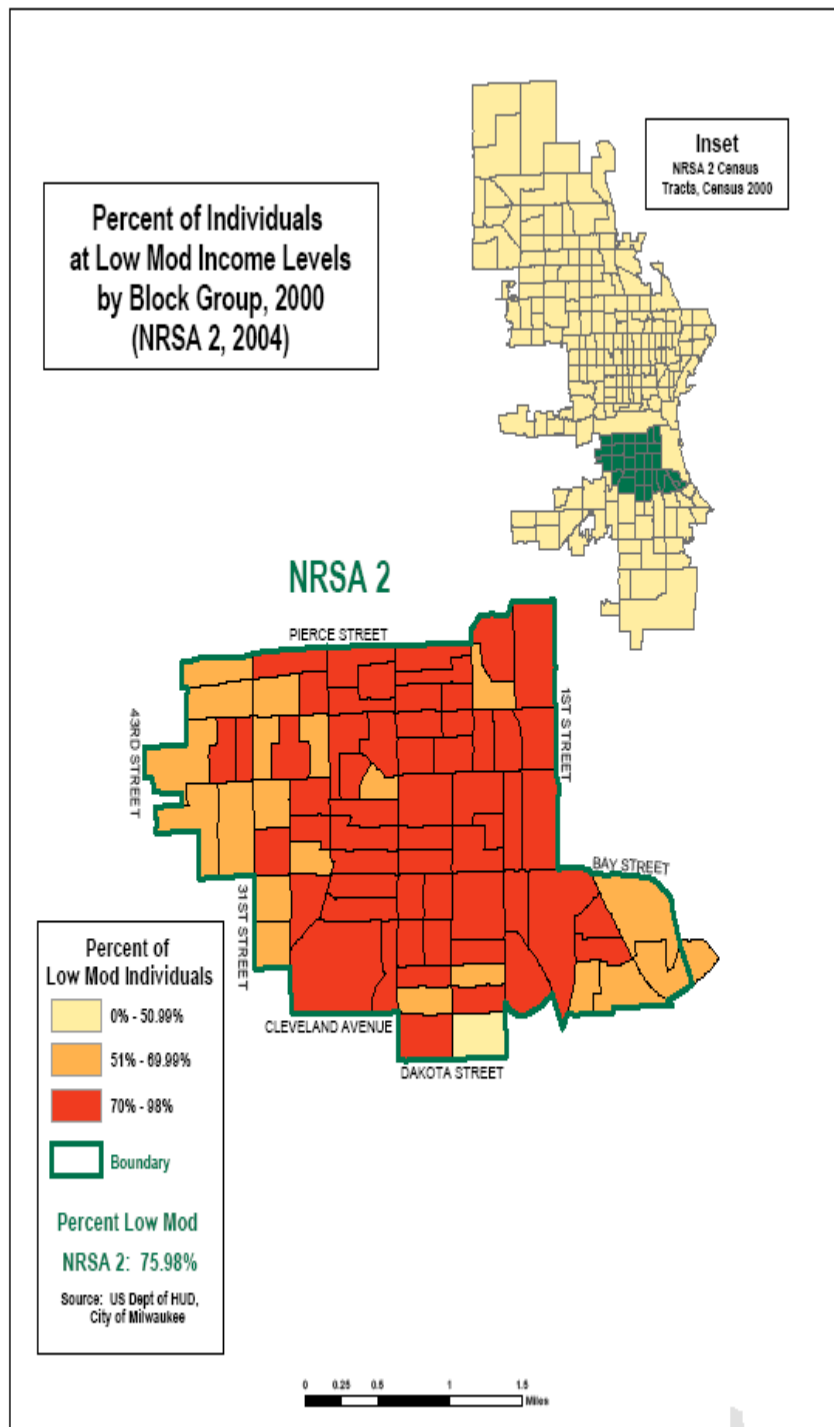
1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

PY 2012 Response:

Geographic Distribution: The primary geographic distribution for these entitlement funds, with the exception of HOPWA funds, is the two Neighborhood Revitalization Strategy Areas (NRSAs). Services will also be provided to low income residents in non-NRSA census tracts within the City of Milwaukee. The HOPWA funds cover the four-County Milwaukee Metropolitan Statistical Area comprised of: Milwaukee, Waukesha, Ozaukee and Washington counties.

See maps and NRSA census tracts on the following pages.





NRSA BOUNDARIES

NRSA 1 CENSUS TRACTS

11,12,13,14,19, 20,21,22,23,24,25,26,27,28,37,38,39,40, 41,42,43,
44,45,46, 47,48,49,50,59,60,61,62,63,64,65,66,67, 68, 69,70,
71,72,79,80,81,82,83,84, 85, 86, 87, 88,89, 90,91,92,93,96,97,98,99,100,
101,102,103, 104,105,106, 107,108,110,111,112,113,114,115,116,117,
118, 119, 120,121,122, 123,124,133,134,135,136,137,138,139,140,141,
146,147,148,149,150,151

NRSA 2 CENSUS TRACTS

155,156,157,158,159,160,161,162,163,164,165,166,167,168,168,170,
171,173,174,175,176,177,178,179,180.01,180.02,186,187,188

2) Describe the reasons for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

PY 2012 Response: Basis for Priorities and Allocation of Funds

Racial/Ethnic Geographic Concentrations

There continues to be racial and ethnic concentrations both within the City of Milwaukee and in the Milwaukee Metropolitan Statistical Area(MSA). According to the U.S. Census, 2000, there is a pattern of concentration of all minorities within the area generally considered to be the "central city." The concentration still remains greatest for African Americans and has been noted by several local and national research studies. Most marked is the concentration of African Americans within the city limits and the fact that only 1.5% of the suburban population of the four-County Milwaukee Metropolitan Area is Black.

Milwaukee's residential segregation has been studied for decades by local and national researchers and policymakers. The tremendous impact on the gaps between Black and Whites as it relates to income, mortgage loan disparity rates and educational attainment, has been cited in numerous national studies. It is important to note the overlay of economic segregation as this impacts employment and other opportunities for Blacks. CDGA-funded programs providing "seed capital" for new economic development activities continues to be a high priority as a means of stimulating economic opportunities including job creation - for Milwaukee residents in the identified Neighborhood Revitalization Strategy Areas (NRSAs).

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on Year 2000 Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee. The major emphasis is on targeting resources to effectuate neighborhood revitalization by integrating housing, economic development and public services in a tightly defined geographic area through a clear and well planned development strategy.

Low Income Concentration

Milwaukee is a city of 602,191 people located within the greater Milwaukee Metropolitan Area which has a population of 940,164 people. Recent population shifts include a movement to suburban areas and a loss of population in the city. Very low income households are concentrated in Milwaukee's near north, west, northwest and south side neighborhoods. Low income households dominate census tracts which are contiguous to the central city areas. Higher incomes (moderate and above moderate) are found in the surrounding areas. These areas are not strictly contiguous; there are several individual tracts with a median income noticeably different than those surrounding. (U.S. Census Bureau Estimate 2007).

The following chart provides an analysis of low income persons within the NRSA areas.

NRSA Area	Total Population*	Total Low/Moderate Income Population*	Total Percent Low/Moderate Income Persons*
NRSA #1 (North)	216,718	162,104	74.79%
NRSA #2 (South)	84,910	64,519	75.98%

* (Based on U.S. Census 2000)

3) Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

PY 2012 Response: Meeting Underserved Needs

There are numerous obstacles to the coordination of public and private resources. Most local public organizations are dependent to some extent on federal Funds and are controlled by federal regulations. Each funding source has specific goals, objectives and need definitions. When these differing criteria are implemented at the local level, the result is very often a fragmented and internally contradictory service delivery system. It is difficult to attract private participation into this system, because the private sector sees the fragmentation and complexity of the system and questions the system's ability to produce measurable results. In spite of the obstacle, Milwaukee has many important public/private initiatives which are committed to addressing community needs. These initiatives occur primarily in the Block Grant area and are coordinated individually by their sponsoring organization and through an informal city-wide network of organizations, foundations, non-profits, educational institutions, businesses and governments.

SOURCES OF FUNDS

1. Identify the federal, state, and local resources the jurisdiction expects to receive to address the needs identified in the plan. **Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan. (92.220(c)(1))**

PY 2012 Action Plan Response: Sources of Funds

Many activities identified in the Annual Action Plan are under the direct control and supported by the following Federal entitlement funds which are administered by the Community Development Grants Administration: **Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA)**. Other Federal and State funds to be used for proposed activities include the High Intensity Drug Trafficking Areas (HITDA) and the Gang Reduction Initiative among other resources.

2. **If you plan to dedicate funds within a local targeted area, provide the boundaries of the targeted area and an estimate of the percentage of funds you plan to dedicate to target area(s). (91.220(f))**

PY 2012 Action Plan Response: Percentage of Funds to Targeted Areas

Not Applicable.

3. **If your plan includes a Neighborhood Revitalization Strategy Area or Areas, please identify the census tracts for each NRSA and an estimate of the percentage of funds you plan to dedicate to the NRSA(s).**

PY 2012 Action Plan Response: Percentage of Funds to NRSA(s)

See proposed expenditures worksheet located in the Additional Files Folder. NRSA maps, boundaries and census tracts are located on pages 7-9.

4. **Explain how federal funds will leverage resources from private and non-federal public sources.**

PY 2012 Action Plan Response: Sources of Funds

CDGA is committed to leveraging funding resources from other types of public and private sources for community development projects funded through CDGA. For 2012, the projects receiving Emergency Solutions Grant (ESG) funds will utilize CDBG funds to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds will be used in conjunction with shelter related activities.

The housing rehabilitation projects will leverage funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. Low Income Housing Tax Credits directly provide a needed subsidy in low-income rental projects by selling the credits to investors. Matching funding for the HOME program will include City-owned appraised land/real property, foregone taxes, fees, charges and City bond financing. HOME funds are also sometimes combined with CDBG funds and/or private funds.

Economic development funds will compliment projects from the Department of Justice, Safe Havens which directly impact community security and safety issues. Also, the High Intensity Drug Trafficking Areas (HIDTA) program will be used to compliment CDBG-funded activities.

- 5. Provide a description of how matching requirements of HUD's programs will be satisfied.**

PY 2012 Action Plan Response: Matching Requirements

The City of Milwaukee received an exemption from the HOME match due to flooding in Milwaukee, Wisconsin in 2010 and received a Presidential Disaster Area declaration. For Year 2012, matching funding for the HOME program will include City-owned appraised land/real property, foregone taxes, fees, charges and City bond financing. HOME funds are also sometimes combined with CDBG funds and/or private funds. ESG funds will be matched utilizing CDBG funds.

- 6. If the jurisdiction deems it appropriate, indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.**

PY 2012 Action Plan Response: Sources of Funds

Not Applicable.

- 7. Identify federal resources the jurisdiction expects to receive from the Housing and Economic Recovery Act and the American Recovery and Reinvestment Act that will be used to address priority needs and specific objectives identified in the plan.**

PY 2012 Action Plan Response: Sources of Funds

For Year 2012, the City will not utilize Housing and Economic Recovery Act or American Recovery and Reinvestment Act funds to address priority needs and specific objectives identified in this 2012 Annual Action Plan.

- 8. Identify whether Neighborhood Stabilization program funding is being used to address priority needs.**

PY 2012 Action Plan Response: Sources of Funds

For Year 2012, the City will not utilize Neighborhood Stabilization Program funding to address priority needs as identified in this 2012 Annual Action Plan.

- 9. Identify whether CPD funding will be coordinated with Department of Energy's Energy Efficiency and Conservation Block Grants, and the Department of Labor's Workforce Investment Act programs to provide opportunities for unemployed, lower-skilled and low income women and men to advance along a middle class career track of increasing skills and wages.**

PY 2012 Action Plan Response: Sources of Funds

For Year 2012, the City will not coordinate CPD entitlement funding with the Department of Energy's Energy Efficiency and Conservation Block Grants, and the Department of Labor's Workforce Investment Act programs.

MANAGING THE PROCESS

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Response:

Lead Agency: The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. The CDGA will continue to solicit and evaluate applications from all interested parties through the open and competitive Request for Proposal (RFP) process. Recommendations for funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

Participation and Consultation: The 5-Year Consolidated Plan and Annual Action Plan was developed through a collaborative process involving a task force and consultation from representatives from numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, residents and others from the private sector. Representatives are:

<u>Name</u>	<u>Organization</u>
Racquel Bell	Brighter Futures
Norma Ballentine	Safe & Sound, Inc.
Trena Bond	Housing Resources
Martha Brown	City Dept. of City Development
Pat Delmenhorst	Interfaith Older Adults Program
Katherine Doyle	Legal Aid Society of Milwaukee
Brian Peters	Independence First
Bethany Sanchez	Milwaukee Metro Fair Housing Council
Kelly Draves	Wiscraft Services for the Blind
Steve Fendt	Southside Organizing Committee
Michael Gapinski	Lincoln Neighborhood Redevelopment Corp.
Michael Gifford	AIDS Resource Center of Wisconsin
Bob Harris	City-Dept. of City Development
Tanya Henry	Milwaukee Careers Cooperative
Barbara Notestein	Safe & Sound, Inc.
Robert Jackson	Boys & Girls Club
Ruth Varnado	Lincoln Park Community Center
Dave Crowley	YMCA-CDC
Nicole Crust	YMCA-CDC

Antonio Perez	Housing Authority of Milwaukee
Maria Rodriguez	Housing Authority of Milwaukee
Michael Van Alstine	Milwaukee Christian Center-NIP
Joseph Volk	Community Advocates & Shelter Task Force
Kathie Walker	North Avenue Community Dev. Corp.
Barbara Moore	Project Respect
Liz Hammer	Silver Spring Neighborhood Center
Delores Green	Lisbon Avenue Neighborhood Development
Paula Butler	Social Development Commission
Kenneth Schmidt	Hope House of Milwaukee
Stephanie Saniter	Hope House of Milwaukee
Bob Greene	Merrill Park Neighborhood Association
Barry Mimis	Northwestside CDC
Julie Borum	YMCA-Parklawn
Shalanys Ellison	Sherman Park Community Association
Milwaukee Continuum of Care	Representing 85 organizations
	City of Milwaukee Health Dept.
	City of Milwaukee-Dept. of Neighborhood Services

Activities to Improve Coordination: The City of Milwaukee is committed to the continued coordination of all community development initiatives. The City will continue to facilitate partnerships between City Departments and community-based organizations, State and County government, neighborhood residents, businesses, faith-based entities and others in the private sector to efficiently link resources and carry out joint planning and program activities. These linkages include the following City departments: Dept. of City Development, Dept. of Administration/ Community Development Grants Administration, Information and Technology Management Division(ITMD), City Health Department, Dept. of Neighborhood Services, Milwaukee Police Department, Milwaukee Fire Department, Housing Authority, Milwaukee Public Library, Redevelopment Authority, Department of Public Works, Common Council/City Clerk, Comptroller's Office and City Attorney. This spirit of cooperation is further supported by the City's cabinet form of government and is carried out on a daily basis through many channels of communication including meetings, phone conversations, e-mail, and other correspondence.

CITIZEN PARTICIPATION

1. Provide a summary of the citizen participation process.
2. Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated annual plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s); the dates of the 30 day citizen comment period, and if technical assistance was provided to groups developing proposals for funding assistance under the consolidated plan and how this assistance was provided.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a summary of citizen comments or views on the plan.
5. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

PY 2012 Response: Citizen Participation

Citizen Participation Process: In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan, which was reviewed and approved by the Common Council of the City of Milwaukee on April 23, 1991. The plan outlines the procedures and processes used by the City to solicit citizen input and has since been updated and revised. The document was subsequently submitted and approved by HUD.

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

Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission.

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

City's Notification Requirement Regarding Draft Plan Availability

A notification will be advertised in a minimum of two local newspapers of general circulation to inform the public that a draft Consolidated Plan, or draft Annual Action Plan is available to review and subject to public comment. The notification will describe the contents and purpose of the particular plan. The notice will also be posted on the City's website(www.milwaukee.gov/cdbg). The public notice will state that copies of the particular Plan will be available for review on the City's website, City libraries, the City's Legislative Bureau and the offices of CDGA. Hard copies will also be available upon request.

The City will make the Plan public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the Plan.

In preparation of the final Consolidated Plan or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

Performance Reports

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

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

The City will publish a notice in at least two local newspapers regarding the availability of the CAPER, which will begin the 30-day review and comment period. The notice and the draft CAPER will also be made available to the public via the City's website, mailings, e-mail, City libraries, City Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report. Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

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

Efforts will also be made through the Common Council's Services Division ADA Coordinator to accommodate the needs of persons with disabilities through sign language interpreters or auxiliary aids.

It should be noted that CDGA strives for increased citizen input and comments in connection with federally funded activities. The City has consistently prepared “drafts” of the Annual Funding Allocation Plan, the Consolidated Annual Performance and Evaluation Plan (CAPER) and previous Consolidated Plans which cover the City’s Community Development Program. The 2010 CAPER Report, which details accomplishments of funded activities, was made available for public review and comment. Additionally the Community Development Grants Administration held public hearings to obtain citizen input on the Year 2012 Funding Allocation Plan. Copies of the CAPER, Annual Action Plan and Consolidated Strategy and Plan are on file with the Milwaukee Public Library System, the CDGA offices and the Legislative Reference Bureau.

2012 Funding Allocation Plan

The Community Development Grants Administration sponsored several public hearings to solicit the input of stakeholders on funding priorities.

It should be noted that the planning and implementation process is an ongoing, funded activity conducted by each of the coordinating agencies. Monthly reports are submitted to CDGA detailing citizen and stakeholder planning and action on issues relating to identified long term outcomes.

In addition, bi-annual performance measurement outcome reports and supporting data are submitted by each coordinating agency.

For the 2012 program year, the following public hearings were held to solicit citizen input on the Year 2012 Funding Allocation Plan, which outlines the range of activities that may be undertaken, the amount of federal funds available and any significant program changes. The public hearings were conducted by members of the Community and Economic Development Committee, the official oversight body for Federal grant funds.

Public Hearing Dates on 2012 Funding Allocation Plan

- 1) Wednesday, July 13, 2011, City of Milwaukee-DPW Field Headquarters;
3850 N. 35th Street: 6:00-8:00pm
- 2) Thursday, July 15, 2011, Kosciuszko Community Center;
2201 S. 7th Street;; 6:00-8:00pm
- 3) Monday, July 18, 2011; City Hall, 200 East Wells Street; 9:00am

CDGA provided copies of the 2012 Funding Allocation Plan to interested citizens and other stakeholders to solicit community/resident feedback. Citizens were able to comment on the Plan from *June 25, 2011 through July 26, 2011*.

CDGA advertised the public hearings through newspapers, mailings, e-mail, telephone calls, City website and word of mouth. The Common Council City Clerk’s Office advertised and posted public notices for the hearings. In addition, the City included in all advertisements that it would accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids.

Official notices for the public hearings on the 2012 Funding Allocation Plan were published in the following newspapers:

Milwaukee Journal/Sentinel, June 27, 2011
Milwaukee Community Journal, June 22, 2011
Waukesha Freeman (HOPWA), June 24, 2011
West Bend Daily News/Hartford Press (HOPWA), June 24, 2011
El Conquistador, June 24, 2011
Port Publications/Ozaukee Press (HOPWA), June 23, 2011

All public hearings were held at times and locations convenient to citizens, potential and actual beneficiaries, community-based agencies and other interested parties, with accommodations provided for persons with disabilities. These public hearings were held in the evenings and at locations in the community that are accessible for persons with disabilities. The public hearings were well publicized through newspaper notices, including Spanish language papers. In addition, two of the meetings were held at agencies that are located in neighborhoods with a majority of African American, Hispanic and non-English speaking persons.

The Year 2012 activities and service providers were approved by the Community and Economic Development Committee on October 24, 2011, and approved by the Milwaukee Common Council on November 2, 2011 and ratified by the Mayor.

Copies of the 2012 Annual Action Plan are on file at the CDGA offices, the City's website, the Milwaukee Public Library system and the City's Legislative Reference Bureau. In addition, the plan was made available to all currently funded community-based organizations, interested parties on CDGA's mailing list, all neighborhood strategic planning agencies, public officials, City departments and others who requested a copy of the document.

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

Access to Information for Limited & Non-English Speaking Persons

To ensure access to information for all residents, current CDGA staff includes two bilingual persons (English-Spanish) who make themselves available in-house or at public hearings where some large segments of the population speak only Spanish. With our large Asian-American population, CDGA has access to Hmong-Laotian interpreters through its linkage with the Hmong American Friendship Association (HAFA).

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

Summary of Citizen comments on the Consolidated Annual Action Plan: As stated, CDGA held several public hearings on the Plan. Several citizens and representatives from non-profit agencies spoke regarding the following: youth services funding, housing, Driver's License Recovery & Employability Project, technical assistance for non-profit agencies, Community Prosecution Program and Legal representation for low income residents. A copy of the meeting agendas, meeting minutes and a list of persons who spoke at the public hearings is included in the Year 3 Additional Files folder.

Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

There were no comments that were not accepted on the Plan.

INSTITUTIONAL STRUCTURE

1. Describe actions that will take place during the next year to develop institutional structure.

PY 2012 Response: Institutional Structure

The City of Milwaukee views the system of implementation of housing and community development strategies from the vantage point of the neighborhood level. The establishment of two contiguous NRSAs, has been a bold move towards defining neighborhoods and involving stakeholders in activities that address identified neighborhood issues. The Neighborhood Revitalization Strategy Areas were developed to more efficiently target resources to identified areas in need.

NRSA is a formal designation from HUD concerning a distressed area of a community that allows more effective targeting of community development resources. This allows the City of Milwaukee an opportunity to formally recognize a distressed community area as the target for a coordinated effort to leverage funding and partnerships to spur reinvestment into local human and economic capital.

The long-term goal of a NRSA is greater self-sufficiency for all of a neighborhood's residents. The City will continue to use NRSAs as a tool for community reinvestment, provided that the documentation is provided that demonstrates the community's distress, the activities are economically feasible and a comprehensive approach is utilized to encourage citizen participation.

In addition to the NRSA structure, there are several other components of the institutional structure that will be utilized to carry out the activities that benefit residents of these areas, of which the City and CDGA play a major role.

Structure 1

Activities funded by and under the control of the Community Development Grants Administration.

Many funded activities are under the direct control and funded by the Community Development Grants Administration. As was stated previously, these activities are primarily funded by Community Development Block Grant, HOME, HOPWA and Emergency Solutions Grant funds. Funded activities will be implemented by the responsible organization and monitored by the CDGA.

Structure 2

Activities carried out by City Departments using a variety of funding sources.

There are activities identified that require collaboration of City Departments for successful implementation. There are a variety of funding sources depending on these kinds of projects. Coordination of these activities must be responsive to the funding source and occurs between the City Departments involved in the project.

Structure 3

Activities carried out by City Departments in cooperation with non-City organizations

Some activities require a City Department to collaborate with a non-City organization for planning and/or implementation. This structure requires very careful and deliberate efforts at coordination of activities. This structure also requires open and on-going communication among the organizations involved in the specific collaboration. In structuring a collaborative effort, the City's needs, resources and goals must be carefully integrated with the needs, resources and goals of the other partners in the project. This is a complex undertaking because each of the partners in the project may be accountable to a different funding source. In spite of the complexity of coordinating various collaborative efforts, the City of Milwaukee will continue to pursue these relationships in an effort to link resources and meet the goals of providing decent housing, establishing suitable living environments and expanding economic opportunities.

Structure 4

Activities carried out by Non-City Organizations

The majority of social service, public service, income transfer, transportation and health services delivered in the City of Milwaukee are administered by non-City organizations. These vital services are an essential part of the comprehensive community development effort. There is no formal institutional structure to coordinate these disparate services with those delivered by City Departments.

The organizations that carry out these services must do so in a manner that will satisfy their funding source. At present, the requirements of the funding source do not necessarily compliment the policies of the City and sometimes contradict the goals and objectives of city-supported activities. The City makes every effort to be involved with non-city organizations, including other non-profit enterprises and for profit businesses, but the City cannot force changes in these services nor can the City create an institutional structure to carry out the Consolidated Plan. The City will continue to work on collaborative efforts with other organizations and continue to communicate the goals and policies of the City.

Obstacles to Addressing the Need

There are numerous obstacles to the coordination of public and private resources. Most local public organizations are dependent to some extent on federal Funds and are controlled by federal regulations. Each funding source has specific goals and objectives. When these differing criteria are implemented at the local level, the result is very often a fragmented and internally contradictory service delivery system. It is difficult to attract private participation into this system, because the private sector sees the fragmentation and complexity of the system and questions the system's ability to produce measurable results. In spite of the obstacle, Milwaukee has many important public/private initiatives which are committed to addressing community needs. These initiatives occur primarily in the Block Grant area and are coordinated individually by their sponsoring organization and through an informal city-wide network of organizations, foundations, non-profits, educational institutions, businesses and governments.

Institutional Structure: Annual Action Plan Priorities:

- a) Place a high priority on Interdepartmental coordination including collaboration between the Dept. of Neighborhood Services, the Dept. of City Development and City Attorney's Office and the Milwaukee Police Department to reduce the negative impacts of nuisance/blighted properties through the Receivership Program.
- b) Continue collaborative neighborhood improvement programs involving City departments and community-based agencies such as the Community Prosecution Program, Neighborhood Clean-ups, City-Wide Housing Coalition and the Health Department Lead Abatement/Prevention Program.
- c) Coordinate City databases with those of community and other governmental entities to allow citizens and community groups to access the City's database to complete housing condition surveys, obtain information on property ownership, tax delinquency, outstanding building code violations and past rehab activity, ([www. Milwaukee.gov](http://www.Milwaukee.gov)).
- d) COMPASS Program – Provide public access to data for the public and community-based agencies; technical assistance to community-based agencies in gathering and researching data, internet mapping and data analysis of CDGA-funded activities.
- e) Continue updates and improvements to CDGA's web site to include pertinent information for community-based agencies and the public.
- f) Continue to enter into collaborations and partnerships with non-City organizations for planning and program implementation purposes.
- g) Continue to advocate for additional resources for a coordinated approach to community development and planning to address poverty issues and community renewal initiatives.

MONITORING

1. Describe actions to be taken that will take place during the next year to monitor your performance in meeting goals and objectives set forth in your Consolidated Plan.
2. Describe steps/actions to be taken during the next year to ensure compliance with program requirements, including requirements involving the timeliness of expenditures.
3. Describe steps/action you will use to ensure long-term compliance with housing codes, including actions or on-site inspections you plan to undertake during the program year.
4. Describe actions to be taken to monitor subrecipients (including sponsors or administering agents) during the next program year. This includes the monitoring of all programs, CDBG, HOME, ESG, or HOPWA, as applicable.

PY 2012 Response: Monitoring

With a focus on ensuring compliance with program requirements, CDGA will include program requirements in all contractual agreements, sponsor orientation sessions, provide technical assistance, one-on-one and in small groups, often on site and at the beginning of the program year as well as when programs are underway. CDGA defines clear expectations regarding performance standards and policies and procedures to follow. Involved are new subrecipients, new staff of existing subrecipients, existing subrecipients experiencing problems and existing subrecipients undertaking new activities. CDGA will also fund provision of technical assistance to funded subrecipients to include management, financial operations and board and staff development.

CDGA will continue to monitor and evaluate activities to be carried out in furtherance of the Consolidated Plan and in meeting goals and objectives set forth in the Annual Action Plan. CDGA monitoring staff will continue to utilize a very detailed monitoring process which includes extensive reporting of grantee activity. As a condition of payment, which is on a reimbursable basis, agencies will be required to submit monthly financial and programmatic reports. CDGA monitoring staff will review these reports to determine that submitted costs are eligible and that the funded activity is being performed to a satisfactory level. In addition, CDGA monitoring staff will maintain extensive contact with funded agencies and provide technical assistance to groups where needed. Agencies needing additional technical assistance will be referred to the CDBG-funded technical assistance providers for additional and ongoing assistance to help improve agency efficiency and accountability.

Informal and formal monitoring visits will be conducted to ensure compliance with program requirements. Risk assessments and in-house desk audits will be performed annually of all funded agencies.

The City Comptroller's office, the fiscal arm of the Community Development Grants Administration, will conduct annual financial audits of all funded groups and monitor the timeliness of expenditures.

In addition to the monitoring conducted, CDGA will ensure compliance with all program regulations for all funding sources, including CDBG, HOME, ESG and HOPWA.

Inspections - The City's Department of Neighborhood Services (DNS), will inspect and verify tenant income levels in HOME-assisted units and document the results, in compliance with the Federal regulations and during the applicable period of affordability. In addition, DNS will inspect properties during the compliance period to ensure that properties remain in a decent, safe, and sanitary condition. Approximately 150 properties will be inspected by DNS per annum. The Department of Neighborhood Services will provide onsite building inspections and general project oversight as follows:

a) **Scope Review and Preparation**: For rehabilitation projects, DNS staff will review the scopes of work provided by non-profit organizations for completeness and accuracy. Staff will ensure that the scope of work includes all items necessary to bring the building into code-compliance and that the proposed materials to be used are of a reasonable quality and price. It is expected that this will require an onsite inspection by DNS staff to confirm the information contained in the scope provided.

b) **Interim Site Inspections**: DNS staff will inspect housing production projects to determine whether the amount of compensation being requested is justified, given the work actually completed. Inspections will verify that the work performed conforms with applicable codes and has been completed in a workmanlike manner. The DNS inspector will also verify that required permits have been obtained and are properly posted onsite.

c) **Final Site Inspections**: DNS staff will inspect projects to determine whether the work items identified in the original scope of work have been completed and that any subsequent change orders are accounted for. The Inspector will verify that all work has been done in conformance with applicable codes and has been completed in a workmanlike manner. The Inspector will also verify permit sign-off and that lead clearance has been provided by Milwaukee Health Department. Finally, the DNS Inspector will issue a Certificate of Code Compliance (rehabilitation projects) or Occupancy Certificate (new construction) for the unit to the agency and CDGA.

As in previous years, a Memorandum of Understanding between CDGA and DNS on the scope of services for these activities will be finalized for each year's activities.

Performance – Based Measurement System for funded Activities

In accordance with its Consolidated Plan, the City will undertake activities to address identified neighborhood and community priorities in conjunction with the new HUD Statutory Program Goals of:

- **Decent Housing**
- **Suitable Living Environment**
- **Expanded Economic Opportunities**

Outcomes: Additionally, CDGA will assess the performance and progress of funded agencies towards addressing the issues facing the low income areas in which they serve, in conformance with the new HUD Statutory Program Outcomes as follows:

- **Availability/Accessibility**
- **Affordability**
- **Sustainability**

As part of this ongoing assessment of performance of funded programs, all funded agencies will be required to link goals and activities with outcomes and collect and submit to CDGA, the data associated with proposed outcomes.

Monthly performance reports are required of all funded groups. In addition, a bi-annual report is also required explaining the data source, along with an assessment on how the funded activities lead and/or contribute to one or more of the HUD outcomes, as listed above. Funded agencies will also be required to submit a final year end report detailing their accomplishments and providing a self assessment of their funded activities along with backup documentation.

It is understood that the development and implementation of a performance measurement system will continue to be an evolving process, in which CDGA will continue to work with funded agencies to identify realistic outcomes that suitably relate to the funded activities.

CDGA will analyze the data collected from funded agencies to help determine the effectiveness and efficiency of funded programs in Milwaukee neighborhoods.

Components of CDGA's Performance Measurement System:

Activity Workplan Components

- ❖ Activity to be performed
- ❖ Timetable to perform the activity
- ❖ Method to be utilized to perform the activity
- ❖ Agency Mid-Term Outcomes expected from the funded activity (includes number of units upon completion of project/activity)
- ❖ Agency Long-Term Outcomes expected from the funded activity (includes the benefits that result from a program). Outcomes typically relate to a change in conditions, status, attitudes, skills, knowledge or behavior. Common outcomes could include improved quality of life for program participants, improved housing stock, economic vitality, increased property values, reduced crime or neighborhood revitalization.

Outcome Measurement Workplan Components

- ❖ Identified Long-Term Outcomes
- ❖ Outcome Measures
- ❖ Data Source for expected outcomes
- ❖ Data collection methods for expected outcomes

DESCRIPTION OF ACTIVITIES

****If not using the CPMP Tool:*** Complete and submit Table 3C

****If using the CPMP Tool:*** Complete and submit the Project Worksheets and the Summaries Table.

(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

1. The action plan must provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

PY 2012 Action Plan Description of Activities response:

See Project Worksheets and the Summaries Tables located in the Year 3 Additional Files Folder.

Summary of Specific Annual Objectives and Outcome Measures

****If not using the CPMP Tool:*** Complete and submit Table 2C and Table 3A.

****If using the CPMP Tool:*** Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls. ***(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)***

1. Provide a summary of specific objectives that will be addressed during the program year. (91.220(c)(3))

PY 2012 Action Plan Summary of Specific Annual Objectives response:

See Summary of Specific Annual Objectives Worksheets or Summaries.xls located in the Year 3 Additional Files Folder.

2. Describe the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives during the program year. (Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

PY 2012 Action Plan Summary of Specific Annual Objectives response:

See Summaries Tables and Project Worksheets located in the Year 3 Additional Files Folder.

3. Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/ accessibility, affordability, sustainability). 91.220(e); (Use of the Summaries Table or Table 2C/Table 3A will be sufficient. No additional narrative is required.)

PY 2012 Action Plan Summary of Objectives/Outcomes response:

See Summaries Tables located in the Year 3 Additional Files Folder.

HOUSING

Annual Affordable Housing Goals (91.220(g))

**If not using the CPMP Tool: Complete and submit Table 3B Annual Housing Completion Goals.*

**If using the CPMP Tool: Complete and submit the Table 3B Annual Housing Completion Goals.*

1. Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

PY 2012 Action Plan Annual Affordable Housing Goals response:

See Table 3B Annual Housing Completion Goals located in the Additional Files Folder.

Specific Housing Objectives

**Please also refer to the Housing Needs Table in the Needs.xls workbook.*

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

PY 2012 Action Plan Annual Specific Housing Objectives response:

The Community Development Grants Grant Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent and affordable housing and economic opportunity for all residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and access to community social services. The City will continue to encourage CDBG, HOME and other HUD-funded project recipients to include work experience opportunities in their housing rehab and new construction projects and to link their projects with other public and private human service, resident organizing and economic development initiatives. The City will utilize CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City will continue to expand collaborations with lenders, businesses, developers, other governmental entities, community stakeholders and other development resources such as WHEDA and Community Development Financial Institutions (CDFIs) to expand available resources.

Reason for Priorities and Obstacles to Addressing the Housing Needs

Homeownership

Homeownership has been identified as a high priority by community residents throughout the City. Increasing homeownership was seen by citizens and advocates alike as fundamental to the development of viable neighborhoods. The commitment to homeownership and the construction of new housing units, particularly for very low income families was identified as critical priorities.

Although homeownership is critical to neighborhood viability, it is very difficult for most low income persons. Lack of income is the major obstacle, which is compounded by other factors such as inadequate access to educational opportunities and limited financing options. In addition, many homes that are affordable are old and require extensive repairs and on-going maintenance. In spite of these obstacles, the City is committed to homeownership as a neighborhood improvement and anti-poverty strategy.

Rental Housing

The data provided shows a great demand for affordable rental housing for low income families and those needing units with three or more bedrooms. Additionally, the need to enhance access to rent-assisted housing units is evident in two ways. First the low turnover rate in public housing and Section 8 units has prevented new families in need from utilizing this resource. Second, assisted units are concentrated in Milwaukee's central city, precluding access to many Milwaukee and suburban neighborhoods for low income families.

There is a shortage of low-cost rental units in non-traditional and suburban neighborhoods. This shortage results in the economic segregation of neighborhoods. Many of the rental units in these economically segregated neighborhoods are old and in need of rehabilitation. In addition, rental property owners have a difficult time repairing the units because their low income tenants cannot afford the higher rents that rehabilitation would warrant. To compound this situation, there is a shortage of Section 8 Vouchers and Certificates.

Safe and Well-Maintained Neighborhoods

The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the Fresh Start housing program, community cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

The lack of adequate safe, decent and affordable housing in Milwaukee is the greatest obstacle in meeting the housing needs of Milwaukee's low income citizens. In addition, the lack of adequate jobs at family supporting wages is a major obstacle in obtaining housing and achieving safe and viable neighborhoods. The lack of jobs creates the cycle of poverty that leads to economic segregation, the flight of the middle class to the suburbs, physical deterioration of neighborhoods and a variety of social ills such as high crime, teen pregnancy and illiteracy. In addition, the lack of adequate funding for housing providers to meet the tremendous demand, coupled with capacity issues, all pose challenges to meeting underserved housing needs.

CONSOLIDATED PLAN STRATEGIC GOAL: EXPANDED HOMEOWNERSHIP AND OWNER-OCCUPIED HOUSING

Develop, maintain and expand the supply of affordable, safe and decent housing that is accessible to income eligible persons; expand opportunities for low income citizens to access affordable housing; increase maintenance and improvement of existing units; assist in preserving existing housing units.

2012 Annual Action Plan - Implementation Strategy:

- 1) Fund owner-occupied housing rehabilitation projects for eligible income households, the construction of affordable new housing units on vacant City lots and the acquisition, rehabilitation and sale of existing vacant housing units.
- 2) Preserve the existing owner-occupied housing stock by providing elderly and low income households with deferred loans through the Neighborhood Improvement Program(NIP) and other resources to assist homeowners with home maintenance and repair.
- 3) Expand homeownership opportunities through Homebuyer Counseling programs and other homebuyer assistance activities (budget and credit counseling, post purchase, tax default and mortgage default counseling).
- 4) Provide support for projects such as Freshstart/Youth Build and Adult Build, which involve work experience and apprenticeships for unemployed persons in home repair and home construction.
- 5) Increase the number of units accessible to persons with disabilities, including “visitable” housing units; construct handicapped ramps and other modifications for disabled persons through the Housing Accessibility Program.
- 6) Utilize the Targeted Investment Strategy(TIN) to cluster housing development to maximize investment and facilitate additional neighborhood investment.
- 7) Assist community housing development organizations (CHDOs) in building capacity to improve their ability to undertake housing development projects.
- 8) Combat lead hazards through collaboration with existing housing programs and the Milwaukee Health Department.
- 9) Support employer-assisted housing and walk-to-work programs.
- 10) Support efforts to reduce or eliminate predatory lending and racial discrimination in all housing transactions in the City of Milwaukee. Work with lenders to become more proactive on central city issues, such as home purchase, home improvement loans and predatory lending.
- 11) Undertake aggressive blight elimination efforts including spot acquisition of vacant lots for affordable housing development.
- 12) Continue partnerships with lenders, developers and others in the private sector to utilize additional resources for housing development and rehabilitation.

CONSOLIDATED PLAN STRATEGIC GOAL: EXPANDED RENTAL HOUSING AND REHABILITATION

Increase the number of decent, safe and sanitary affordable rental units, for income eligible households; expand the number of units to accommodate large families; assist in preserving existing rental housing units.

2012 Annual Action Plan - Implementation Strategy:

- 1) Fund Rental Rehabilitation projects which provides forgivable loans for the rehabilitation of multi-unit housing for eligible income households.
- 2) Fund the construction of multi-family housing in conjunction with Low Income Housing Tax Credits to reduce rent costs for eligible income persons.
- 3) Support projects by developers and non profit organizations for the purchase/rehabilitation of multi-family housing for use and occupancy by special populations such as the frail, elderly, persons with mental illness and those with substance abuse issues.
- 4) Improve the condition of the City's existing rental housing stock through intensive code enforcement, landlord tenant programs, graffiti abatement and an aggressive receivership program for nuisance properties.
- 5) Support other housing improvement activities to help improve and preserve the City's existing rental housing stock.
- 6) Combat lead hazards through collaboration with existing housing programs and the Milwaukee Health Department.
- 7) Support active citizen participation in monitoring problem properties and organizing efforts to improve the quality of life for residents.
- 8) Continue partnerships with lenders, developers and others in the private sector to utilize additional resources for housing development and rehabilitation.
- 9) Support the development of existing Community-Housing Development Organizations,(CHDOs) in building capacity to own and/or develop housing units, while also seeking other non-profit developers and providing the education and technical assistance needed to undertake CHDO housing activities, particularly rental housing development.

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator (# units)	FY 2012 benchmarks (#units)
Acquire/Rehab/Sell	Expand the supply of affordable housing units for low income persons through acquisition/rehab/sale activities	Decent Housing	Affordability	# affordable units complete & sold to eligible persons	49
New Housing production(rental & owner-occupied)	Construct new owner-occupied and/or rental housing for income eligible households.	Decent Housing	Affordability	# affordable units complete & sold to eligible persons #rental units complete & occupied by eligible persons	
Rehabilitation of existing rental units	Rent rehab: Provide forgivable loans for the rehab of residential rental units for occupancy by low-moderate income households.	Decent Housing	Affordability	#affordable rental units complete & code compliant	
Owner-Occupied Rehab Programs (Non profit agencies & City departments)	Provide forgivable housing rehab loans for repairs based on interior and/or exterior municipal code violations.	Decent Housing	Affordability	#owner-occupied units complete & code compliant	125
Milwaukee Builds Housing Apprenticeship Program	Provide apprenticeships in home repair and home construction.	Decent Housing	Affordability	#affordable units complete & sold to eligible persons	3
Housing Accessibility Program	Construct handicapped ramps and other accessibility modifications	Decent Housing	Availability/ Accessibility	#units constructed & persons with increased accessibility	25
Graffiti Abatement	Abate graffiti nuisances on residential properties	Decent Housing	Affordability	#units of graffiti abated & properties improved	600
Lead Prevention & Abatement	Combat lead hazards through Inspection, testing and abatement in collaboration with existing housing rehab programs and the Milwaukee Health Department.	Decent Housing	Affordability	#units of housing tested & abated of lead hazards	600

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator (# units)	FY 2012 bench marks (Citywide)
Housing-Targeted Code Enforcement	Increase targeted code enforcement to decrease decline in target areas	Suitable living environment	Sustainability	# residential structures brought into code compliance	1,500
FOCUS (Fire Prevention)	Install free smoke detectors and provide fire prevention & education for residents; conduct screenings and referrals for additional social services.	Decent Housing	Affordability	#low income households assisted	700
Code Enforcement-Tenant Assistance program & Landlord/Tenant Compliance	Address identified code violations on rental properties through rent withholding and rent abatement; use rental proceeds for repairs related to health, safety and welfare of tenants.	Suitable living environment	Sustainability	#households assisted & number of repairs	1,700
Acquisition of Real Property	Acquire blighted properties for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	3
Cleanup of Contaminated Sites (Brownfields)	Remediation of Brownfields for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	10

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

PY 2012 Response: Leveraging Funds

The housing rehabilitation projects will leverage funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. Low Income Housing Tax Credits directly provide a needed subsidy in low-income rental projects by selling the credits to investors. HOME funds are also sometimes combined with CDBG funds and/or private funds.

NEEDS OF PUBLIC HOUSING

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Milwaukee Public Housing Authority

The following is excerpted from the 2009-2013 Housing Authority Agency Plan.

Mission

The mission of the Milwaukee Housing Authority is to provide decent, quality, safe and affordable housing with transition options for those who desire them. "Transition option" is defined as the opportunity for residents to self-determine their interest in, and have access to, housing options that support long-term self-sufficiency.

The Housing Authority of the City of Milwaukee manages 3,978 public housing units.

Most of the housing units are in good to excellent condition; however, the configuration of the apartments in the round towers are challenging for the staff and its residents. The Housing Authority is in the process of revitalizing its Scattered Sites and has plans to revitalize its Westlawn public housing development. The Housing Authority is also substantially modernizing the Lapham Park highrise, Becher Court, and College Court highrises.

The Housing Authority maintains two separate wait lists for its public housing program: 1) the family wait list, which has 7,162 persons as of May 19, 2009, and 2) the elderly/near elderly/disabled wait list, which included 2,278 persons as of May 19, 2009. In addition to the public housing wait list, there are approximately 3,620 persons on the tenant-based waiting list.

There are 47 applicants on the family public housing wait list that need an accessible unit, and 60 applicants on the elderly/near elderly/disabled waiting list that need an accessible unit.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

Select all that apply:

- ☒ Employ effective maintenance and management policies to minimize the number of public housing units off-line
- ☒ Reduce turnover time for vacated public housing units
- ☒ Reduce time to renovate public housing units
- ☒ Seek replacement of public housing units lost to the inventory through mixed finance development

-
- ☒ Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
 - ☒ Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
 - ☒ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
 - ☒ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
 - ☒ Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
 - ☒ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

Strategy 2: Increase the number of affordable housing units by:

Select all that apply:

- ☒ Apply for additional section 8 units should they become available
- ☒ Leverage affordable housing resources in the community through the creation of mixed - finance housing
- ☒ Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- ☒ Other: (list below)
-Continue to actively participate in the City's Continuum of Care

Need: Specific Family Types: Families at or below 30% of Area Median Income(AMI)

Strategy 1: Target available assistance to families at or below 30 % of AMI

Select all that apply:

- ☒ Employ admissions preferences aimed at families with economic hardships
- ☒ Adopt rent policies to support and encourage work

Need: Specific Family Types: Families at or below 50% of median

Strategy 1: Target available assistance to families at or below 50% of AMI

Select all that apply

- ☒ Adopt rent policies to support and encourage work
- ☒ Other: (list below)
Administer a preference for placement of families with a broad range of incomes regardless of source.

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply:

- ☒ Seek designation of public housing for the elderly
- ☒ Other: (list below)
Work with the Continuum of Care to develop more permanent housing opportunities for homeless persons.

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply:

- ☒ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- ☒ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- ☒ Affirmatively market to local non-profit agencies that assist families with disabilities
- ☒ Other: (list below)
Continue to work with Independence First to expand homeownership opportunities for individuals and families with disabilities and work with the Continuum of Care to expand opportunities through partnerships.

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

Select if applicable:

- ☒ Affirmatively market to races/ethnicities shown to have disproportionate housing needs

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply:

- ☒ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- ☒ Market the section 8 program to owners outside of areas of poverty /minority concentrations
- ☒ Other: (list below)
Open Section 8 wait list.

Other Housing Needs & Strategies: (list needs and strategies below)

Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- ☒ Funding constraints
- ☒ Staffing constraints
- ☒ Limited availability of sites for assisted housing
- ☒ Extent to which particular housing needs are met by other organizations in the community
- ☒ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- ☒ Influence of the housing market on PHA programs
- ☒ Community priorities regarding housing assistance
- ☒ Results of consultation with local or state government
- ☒ Results of consultation with residents and the Resident Advisory Board
- ☒ Results of consultation with advocacy groups

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

☒ **PHA Goal:** Expand the supply of assisted housing

Objectives:

- ☒ Apply for additional rental vouchers:
- ☒ Reduce public housing vacancies:
- ☒ Leverage private or other public funds to create additional housing opportunities:
- ☒ Acquire or build units or developments

☒ **PHA Goal:** Improve the quality of assisted housing

Objectives:

- ☒ Improve public housing management: (PHAS score) 82
- ☒ Improve voucher management: (SEMAP score) 93
- ☒ Increase customer satisfaction:
- ☒ Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)
- ☒ Renovate or modernize public housing units:
- ☒ Demolish or dispose of obsolete public housing:
- ☒ Provide replacement public housing:
- ☒ Provide replacement vouchers:
- ☒ Other: Use debt financing for the revitalization of public housing.

☒ **PHA Goal:** Increase assisted housing choices

Objectives:

- ☒ Provide voucher mobility counseling:
- ☒ Conduct outreach efforts to potential voucher landlords
- ☒ Increase voucher payment standards
- ☒ Implement voucher homeownership program:
- ☒ Implement public housing or other homeownership programs:
- ☐ Implement public housing site-based waiting lists:
- ☒ Convert public housing to vouchers:
 - Highland Park midrise
 - Cherry Court midrise
 - Convent Hill
 - Becher Court
 - Scattered Sites
- ☒ Other: Develop new units for homeownership

HUD Strategic Goal: Improve community quality of life and economic vitality

☒ **PHA Goal:** Provide an improved living environment

Objectives:

- ☒ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- ☒ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:

-
- ☒ Implement public housing security improvements:
 - ☒ Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
 - ☒ Other: Work to restore HUD funding for activities/services previously funded through PHDEP. Additional pressure for funding for security has been jeopardized by decreases in operating subsidy and HUD Capital Fund.

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

- ☒ **PHA Goal:** Promote self-sufficiency and asset development of assisted households

Objectives:

- ☒ Increase the number and percentage of employed persons in assisted families:
- ☒ Provide or attract supportive services to improve assistance recipients' employability:
- ☒ Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- ☒ Other: Enroll additional families in "Make Your Money Talk" program.

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

- ☒ **PHA Goal:** Ensure equal opportunity and affirmatively further fair housing

Objectives:

- ☒ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
- ☒ Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
- ☒ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:

Other PHA Goals and Objectives:

- Continue the Section 32 Homeownership Program and sell 10 homes to eligible families.
- Use "force account labor", which includes the Housing Authority's carpenters, painters, and HVAC technicians to perform work funded through the Capital Fund grant.
- Continue the Section 8(y) Homeownership option and convert 10 households from rental to ownership.
- Develop, including acquisition and rehabilitation, market and sell market rate homes including the use of brokers.
- Develop and implement a Phase II redevelopment plan for the Convent Hill site.
- Submit at least one Hope VI application in response to the Notice of Funding Availability (NOFA). Redevelopment site(s) to be determined on the basis of the amount of the grant money available.
- Submit funding applications for Low Income Housing Tax Credits, the Affordable Housing Program and other sources necessary to support HACM property redevelopment.
- Continue to implement Asset Based Property Management and submit the Year 4 Stop Loss data by the required date.
- Close out the 2003 Scattered Sites Hope VI grant.
- Continue to operate the VA/SRO facility.

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- Continue to administer the Veterans Administration Supportive Housing (VASH) grant through the Section 8 Voucher program.
 - Continue to offer the “Make Your Money Talk” program. Enroll and graduate 20 families.
 - Continue the HACM educational scholarship program. Award 25 scholarships.
 - Prepare and implement a redevelopment plan for Westlawn and submit grant and other property related applications necessary to support the plan.
 - Partner with Sun Starr to resubmit an application for Low Income Housing Tax Credits to support the redevelopment of the Becher Court property.
 - Determine if resources are available to support an RFP for Project Based Section 8 assistance and complete an RFP if appropriate.
 - Provide staff support for the City’s Supportive Housing Commission.
 - Continue to actively participate in the City’s Continuum of Care. Partner with Community Advocates and Hope House and the Salvation Army to submit a Rapid Rehousing Project for funding under the McKinney-Vento Homeless Grant Program.
 - Continue partnerships and MOU’s with local community based organizations to provide tenant based Section 8 assistance, subject to availability, to eligible families referred by META House, the Milwaukee Community Service Corps, Independence First, St. Catherine’s, the Pan African Community Association, and the Consortia to Re-Unité Families.
 - Continue to offer the “Second Chance” program and place up to five eligible families, subject to availability, as referred by the Counseling Center, the Milwaukee Women’s Center and Nia Imani Family Inc.
 - Approach Salvation Army about partnering with HACM to make referrals to the “Second Chance” program.
 - Apply for grants from all eligible sources of funding to support HACM functions and property redevelopment.
 - Consider use of Capital fund and Operating fund reserves to leverage financing for redevelopment.
 - Comply with the requirements of the Regulatory and Operating Agreements for public and assisted housing units owned by the Highland Park Development LLC, the Cherry Court LLC, the Convent Hill LLC, the Carver Park I & II LLC’s, and the Scattered Sites I & II LLC’s.
 - Provide support for the resident event sponsored by the HACM Resident Advisory Board.
 - Maintain “High Performer” status under the Section 8 Management Assessment Program and re-gain “High Performer” status under the Public Housing Assessment System.
 - Submit applications as necessary for disposition and/or demolition of HACM property owned by the low income program.
 - Use Energy Star standards and green technology to the maximum extent feasible in HACM new construction and redevelopment.
 - Submit an application for Moving-to-Work or its successor program.
 - Open the family public housing waiting list.
 - Submit acquisition plans for developing public housing.
 - Submit a waiver to convert some public housing units to project-based.
 - Secure a line of credit for the revitalization of public housing.
 - Work in partnership with the United Community Center to provide enhanced services for Housing Authority residents, including the submission of a low-income housing tax credit application to support the revitalization of Becher Court.
 - Submit waiver requests, as needed, to effectively administer and revitalize HACM’s subsidized programs.
 - Work with the City of Milwaukee on neighborhood revitalization activities, including efforts to stabilize abandoned and foreclosed properties.
 - Use project-based vouchers to support the revitalization of Scattered Sites.

Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

See above

If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

Not applicable – The Housing Authority is not designated as “troubled”.

ANTI-POVERTY STRATEGY

1. Briefly describe the actions that will take place during the next year to reduce the number of poverty level families (as defined by the Office of Management and Budget and revised annually), taking into consideration factors over which the jurisdiction has control.

PY 2012 Action Plan Antipoverty Strategy response:

As demonstrated in the *2010-2014 Consolidated Plan*, poverty is a daily part of the lives of many of Milwaukee's households. According to the latest Census Bureau estimates released in September 2009, "23.4% of Milwaukeeans lived in poverty, while one in three children were considered poor. The City of Milwaukee's poverty rate was the 11th highest among cities with a population of 250,000 or more."

Throughout the Consolidated Plan and Annual Action Plan, the importance of creating jobs at family supporting wages is emphasized. Adequate employment opportunities for Milwaukee residents is a major factor in the Housing and Community Development Strategy and the Anti-Poverty Strategy. Decent jobs is the single most important element in eliminating poverty and providing households with adequate income to invest in their housing and neighborhoods. The City of Milwaukee is committed to retaining and creating jobs and economic opportunities for its residents.

The City of Milwaukee's Anti-Poverty Strategy is focused on the expansion of opportunity in the areas of education, employment, economic development and housing. The City has increasingly targeted local and federal resources toward concerted efforts to create jobs and generate economic activity in specific areas of the City affected by years of financial disinvestment. At the same time, City departments are working collaboratively with the non-profit sector to advance innovative poverty reduction programs.

The City will continue to focus on neighborhoods as a whole and on economic development activities within these areas which will lead to job creation. Various City departments will work in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. Citizens will be involved with code enforcement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the pilot Fresh Start housing program, to foster community cohesion and improve the physical appearance and safety of neighborhoods.

The City's efforts are guided by several important assumptions.

- Jobs and job creation must be at the centerpiece of the poverty reduction strategy in light of Milwaukee's job gap (difference between the number of persons expected to work and the number of available jobs). The creation of jobs, the matching of jobs to the skills of the labor force, and the location of jobs are all fundamental components of the anti-poverty strategy notwithstanding the fact that much of Milwaukee's economic future will be determined by regional and global economic forces rather than local decisions.
- The opportunity to work, prepare for work, or contribute to the community's improvement should be built into every program providing services to people living in poverty.
- Programs which support strong families and promote safe neighborhoods can help create environments conducive to investment and economic development. Greater linkage between business activity, social services and community organizing, for example, can maximize resources and significantly enhance the impact of public dollars.

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- Successful efforts to reduce poverty, particularly in targeted neighborhoods, require the combined efforts of the public sector funding and services, non profit and business. Collaborative efforts provide the level of sustained investment and the breadth of skill needed to achieve significant reductions in the level of poverty.
 - The investment in human capital is critical. This means working cooperatively with Milwaukee Public Schools, colleges and universities, and employment and training programs to constantly improve the quality of Milwaukee's labor force and to enhance individual economic opportunity. In many instances, the development of individual economic ability requires one-on-one case management, multiple social services and housing assistance in addition to education and training resources.

Given these assumptions and the City's long history of economic development, neighborhood revitalization and housing initiatives, the City has a solid foundation to continue and expand the following strategies to eliminate poverty and revitalize neighborhoods.

CONSOLIDATED PLAN STRATEGIC GOAL: Expand opportunities in the areas of education, employment, economic development and housing. Target local and federal resources toward concerted efforts to create jobs and generate economic activity in specific areas of the City affected by years of financial disinvestment.

2012 Annual Action Plan - Implementation Strategy:

- 1) Create livable wage jobs through aggressive economic development activities to help reduce the unemployment of Milwaukee residents.
- 2) Support programs that provide skilled trades and high-tech training and those with an apprenticeship component such as Youth Build, Adult Build and Milwaukee Builds.
- 3) Generate economic activity directly or "piggyback" employment and economic development activities on social service programs that teach self sufficiency.
- 4) Support the Driver's License and Employability Program to assist low income Residents in restoring driver's license privileges and to assist in employment opportunities.
- 5) Support programs and initiatives which assist in removing barriers for low income persons such as walk-to-work programs, English proficiency programs and those that provide access to an array of wrap services such as: Health services, social services, education, employment, transportation and lifeskills.
- 6) Expand affordable homeownership opportunities for residents; increase quality affordable rental housing.
- 7) Improve the physical appearance, social and economic vitality of Milwaukee neighborhoods.
- 8) Foster community partnerships involving residents, community-based agencies, schools, faith-based entities, businesses, government and others to help improve the overall quality of life for families.
- 9) Promote neighborhood resident involvement, stability and pride through activities that foster community collaboration such as community organizing, crime prevention and block clubs.

BARRIERS TO AFFORDABLE HOUSING

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

2. Describe the actions that will take place during the next year to foster and maintain affordable housing.

PY 2012 Action Plan Barriers to Affordable Housing response:

The City of Milwaukee will continue to fund multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods and reduce barriers to affordable housing. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

Affirmatively Furthering Fair Housing

The Community Development Grants Administration completed a Fair Housing Impediments Study in 2005, in accordance with Sections 104(b) (2) and 106(d)(5) of the Housing and Community Development Act of 1974, as amended which requires that CDBG grantees certify that they will affirmatively further fair housing. ***This study will be updated in Year 2012.***

The City of Milwaukee: Analysis of Impediments to Fair Housing study identifies numerous impediments some of which present barriers to affordable housing, fair housing and housing choice. The following is a summary of those impediments.

Summary of Impediments:

- ❖ Institutional and governmental policies and regulations which affect income and housing
- ❖ Non-coherent Federal housing mandates and Federal and State transportation policies
- ❖ Lack of enforcement mechanism for complaints of discrimination
- ❖ Lack of housing units accessible to persons with disabilities
- ❖ Overcrowded housing
- ❖ Lack of affordable housing supply
- ❖ Cuts in funding to Section 8 Housing Choice Voucher Program
- ❖ Lack of a Regional Housing Strategy or Plan
- ❖ Attack on the Community Reinvestment Act (CRA)
- ❖ Suburban policies (NIMBYism, impact fees, exclusionary zoning codes, exclusionary public housing or Section 8 Rent Assistance vouchers, inadequate public transportation).
- ❖ Social class, racial and cultural barriers
- ❖ Housing and employment discrimination
- ❖ Residential segregation
- ❖ Inadequate income

-
- ❖ Racial disparities in mortgage lending
 - ❖ Insurance redlining; appraisal practices
 - ❖ Racial steering

Actions to be undertaken to help overcome the effects of impediments identified in the study.

Response: In addition to the responses below, see City response on recommendations from the *City of Milwaukee-Analysis of Impediments to Fair Housing Study*, located in the Year 3 Additional Files Folder.

The City of Milwaukee will continue to fund multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods and reduce barriers to affordable housing. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

Utilization of Strengthened Fair Housing Ordinance

The City passed its first fair housing ordinance on December 12, 1967. In line with Wisconsin State Statutes enacted in 1965, the ordinance rendered unlawful any type of discrimination in the sale, rental or lease of housing based on race, color, religion, national origin or ancestry. Expressly prohibited were the following forms of discrimination: (1) Refusal to sell, lease, finance or contract to construct housing or to discuss the terms thereof; (2) Refusal to permit inspection or exacting different or more stringent price, terms or conditions related to the sale, lease or rental of housing (3) Refusal to finance or sell an unimproved lot or to construct a home or residence on a lot; or (4) Publishing, circulating, issuing, displaying or advertising the sale, financing, lease or rental of housing which states or indicates any discrimination in connection with housing.

The City's original fair housing ordinance was repealed and recreated on October 16, 1990 and again on December 16, 2008. Referred to as Chapter 109, it was subsequently amended to prohibit both housing and employment discrimination. Regarding housing, the law applies to all housing units intended for occupancy by two or more families living independently of each other, eliminates provisions against testing and substantially increases penalties for non-compliance.

City of Milwaukee – Equal Rights Commission

The City has re-established its Equal Rights Commission through Milwaukee Common Council legislation approved on December 16, 2008 recommending a new ERC model. Commissioners for the ERC were confirmed in January 2009. The model can be summarized as follows:

The City of Milwaukee ERC was re-established by Common Council ordinance with the broad objective of providing oversight and establishing collaborative working relationships with other organizations in Milwaukee, academia and the business community to improve the equal rights climate in the City of Milwaukee. The proposed model will maintain the City's oversight, investigative and enforcement capabilities over discriminatory practices not addressed and protected by federal and state laws. The following are the broad functional responsibilities of the new ERC:

Oversight/Accountability
Community Collaboration and Partnerships
Prevention, Education and Training

The City is also in discussions with the Metropolitan Milwaukee Fair Housing Council (MMFHC) regarding a formal referral process for housing discrimination complaints. In the meantime, MMFHC will provide training to City employees about housing discrimination law.

Annual Review of Lending Practices by City Comptroller

The Milwaukee Common Council adopted legislation requiring the City Comptroller to prepare an annual report on lending practices by area financial institutions. Besides focusing on residential lending practices, the review also compares lending patterns by race and income and compares the racial loan denial rate for Milwaukee with forty-nine other large metropolitan areas in the country. Recommendations are provided for improving residential lending in those areas of the City where homeownership is lowest and annual reviews of the progress that City departments have made in implementing prior report recommendations. This report will be distributed annually to community-based organizations, lenders and others to help facilitate action on the recommendations.

FAIR HOUSING PROGRAMS

City Subcontracts with Fair Housing Programs

The City will subcontract with the Metropolitan Milwaukee Fair Housing Council (MMFHC) and the Legal Aid Society of Milwaukee to respond to the problem of predatory lending and affirmatively work toward integrated housing patterns.

Metropolitan Milwaukee Fair Housing Council (MMFHC) will affirmatively work toward integrated housing patterns by providing: fair housing/ fair lending presentations, research and technical assistance relative to fair housing/ fair lending issues, information relative to buying, renting and selling homes, counseling and investigation services to receive and resolve fair housing/fair lending complaints, distribution of a fair housing newsletter on a quarterly basis and a coordinated community-wide response to the problem of predatory lending. This will be accomplished through the following:

- **MMFHC's Counseling and Investigative Services** will investigate fair housing complaints to uncover insidious forms of systemic discrimination in the housing industry. MMFHC will conduct tests in the rental, sales, insurance and lending industries throughout its service area.
- **MMFHC's Education and Outreach Program** will inform home-seekers and housing providers about fair housing rights and responsibilities to ensure compliance with fair housing laws. Fair housing and fair lending presentations will be conducted to civic, business, educational, neighborhood, religious and housing industry groups.
- **MMFHC's Fair Housing Training Services** will assist housing professionals in the real estate, insurance and mortgage lending industries and provide contractual fair housing training. MMFHC will conduct specialized seminars on fair housing issues for a variety of groups. These seminars provide in-depth information on fair housing and fair lending laws, procedures and other related issues.

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- **MMFHC's Community Economic Development (CED) Program** will address fair lending issues in a variety of ways. CED staff will respond to calls from a predatory lending hotline and investigate fair lending allegations. After investigating the loan and discussing options with the client, where appropriate, cases will be referred to Legal Aid, other attorneys and/or lenders and housing counseling agencies. Also, when appropriate, CED will assist clients to restructure existing loans or to find other, more appropriately priced loans, sometimes helping clients apply for refinancing through the rescue fund operated by the National Community Reinvestment Coalition (NCRC). CED will also assist consumers file complaints with the Wisconsin Department of Financial Institutions.
 - CED will also generate television, radio and print coverage on predatory lending as part of its' outreach and education. CED staff will disseminate informational brochures on predatory lending in English and Spanish and give educational presentations to church groups, neighborhood associations, civic organizations, social service groups, elected officials and affordable housing professionals. CED staff will help plan and implement workshops designed for people considering refinancing or home equity loans, including workshops at the Money Conference and other neighborhood or community-based events.

CED staff will continue to convene a citywide group called the CRA Caucus. The CRA Caucus works to collectively find ways to encourage lenders to live up to their commitments under the Federal Community Reinvestment Act (CRA).

The **Legal Aid Society of Milwaukee**, Inc., will continue to operate its' A-LINE Project and represent vulnerable inner city residents who have been victims of predatory lending practices. Legal Aid Society will continue to provide direct representation to victims of predatory mortgage lending practices and mortgage foreclosure rescue scams.

Legal Aid will also continue its efforts to challenge the unconscionable practices of auto title lenders in our community.

TITLE II of the Americans with Disabilities Act of 1990(ADA)

Title II of the ADA prohibits discrimination against persons with disabilities in all services, programs and activities made available by State and local governments. CDGA includes this language in all contracts with funded organizations.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination against persons with disabilities and requires that a percentage of funded projects be handicapped accessible. CDGA will continue to routinely review plans for multi-family housing and facilities where CDGA-funded services are provided to ensure accessibility and participation by disabled persons.

In addition, CDGA will fund the **Housing Accessibility Program** in Year 2012. This program provides Housing accessibility improvements for income eligible persons with physical, visual and hearing disabilities. Improvements can include handicap accessible ramps, bathroom, kitchen, bedroom and living room modifications and safety enhancements.

SECTION 8 – Rent Assistance Program

The Housing Authority of the City of Milwaukee (HACM) receives funds from HUD to operate its Rent Assistance Program (RAP). RAP pays rental subsidies to private landlords who rent to very low -income tenants in the program. Under the Housing Voucher Choice Program, units cannot exceed HUD's fair market rents, meaning that rents must be determined reasonable in relation to other units in the area.

In the voucher program, tenants are able to rent units which have rents from 10% to 20% above fair market value when they locate to a "non-impacted" area --- where fewer than 40% of the families are below the poverty level.

HACM will continue participation in a program which markets the benefits of living in non-traditional residential areas and encourages more rent assistance clients to move to such areas. This will be accomplished through: orientation briefings to explain fair housing law, client location options and additional services; general counseling to families regarding housing choices and housing search skills; direct tenant referrals to available units in non-traditional areas resulting in the pro-integrative placement of families; and, the recruitment of new owners of units in non-traditional areas. During orientation and counseling, all RAP applicants will be informed that they could seek housing anywhere they choose and will also be informed of the portability provisions of vouchers and the advantages of locating to a non- traditional area. Listings of housing units will be provided to applicants, including many in non-traditional areas. Also, a list of wheelchair accessible units will be made available upon request for those in need.

In addition, the City will continue its commitment to city-wide fair housing programs to help ensure accountability in lending by government-chartered lending institutions in the areas of: home purchase, home improvement and business loans, employment and promotional opportunities and contracting opportunities for minority and women-owned businesses.

LEAD-BASED PAINT

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

PY 2012 Action Plan Lead-Based Paint response:

Reducing Lead-Based Paint in Housing Units

The number of housing units in Milwaukee that contain lead-based paint hazards as defined by Section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (pre-1978 housing units with lead-based paint hazards) is estimated at approximately 168,543 housing units. These housing units are occupied by approximately 115,000 families who are extremely low-income, low-income or moderate income.

The Milwaukee Health Department (MHD) Childhood Lead Poisoning Prevention Program (CLPPP) further prioritizes approximately 40,000 of these housing units as representing the epicenter of the childhood lead poisoning prevention problem in Milwaukee. These highest risk housing units are located in target areas where the majority of homes were built before 1925 with roughly 2/3 of the homes being rental properties.

Beginning in 1995, the City of Milwaukee sought to voluntarily comply with anticipated regulations, which subsequently took effect Sept. 15, 2000 regarding the reduction of lead based paint hazards. Since that time, several initiatives have been undertaken to address the problem and much has been accomplished to reduce the effects of lead-based poisoning among children in Milwaukee. The City, (CDGA, Health Dept., the Department of Neighborhood Services (DNS) and the Dept. of City Development), have collaborated on efforts to integrate lead-safe work practices into City housing projects. Under the direction and leadership of the City's Health Department, the City has utilized multiple HUD grants from the HUD Office of Healthy Homes and Lead Hazard Control for focused treatment of addressing high risk window components where lead paint content and lead dust levels are extremely high, while the property owner addresses other lead hazards that may be present in the home. In addition, the Health Department provides comprehensive secondary interventions to lead poisoned children and their families and has successfully engaged in community and housing-based primary prevention to prevent lead exposure in areas disproportionately impacted by childhood lead poisoning.

These programmatic functions are funded by 4 distinct funding sources, including CDBG.

CONSOLIDATED PLAN STRATEGIC GOAL: Evaluate and reduce lead-based paint hazards and their effects with the long term goal of eradicating Childhood lead poisoning in the City of Milwaukee.

The City's Health Department has developed a comprehensive and nationally recognized program which includes both secondary interventions (services to lead poisoned children and their families) and primary prevention activities (making high risk housing lead-safe before a child is poisoned).

Specific actions to evaluate and reduce lead-based paint hazards in 2012 include:

- ❖Lead testing
- ❖Laboratory analysis
- ❖Surveillance
- ❖Care Coordination
- ❖In-Home Case Management (Home Visits)
- ❖Lead Risk Assessments/Inspections
- ❖Lead Hazard Reduction
- ❖Primary Prevention
- ❖Community Capacity Building
- ❖Research
- ❖Healthy Housing Partnerships

2012 Annual Action Plan - Implementation Strategy:

- 1) Compliance with the Lead Safe Housing Rule. Produce lead safe housing units within the high risk target areas, of which 625 are federally-funded.
- 2) Provide partial grant subsidies to assure the remediation of lead-based paint hazards at high risk window components for housing units previously scheduled for condemnation and currently undergoing intensive housing rehabilitation.
- 3) Provide Section 8 landlords and Milwaukee residents that purchase foreclosed properties partial subsidies for Lead Hazard Control.
- 4) The MHD and the Department of Neighborhood Services (DNS) – Residential Code Compliance will work in tandem with community-based agencies to assure lead-safe and habitable housing within Milwaukee's target areas.
- 5) DNS will include the MHD CLPPP information in landlord training classes that are offered in both English and Spanish.
- 6) MHD CLPPP will provide lead hazard control for properties with asthmatic children identified in Milwaukee's Healthy Homes Demonstration Project.
- 7) Involve community members most affected by the problem in neighborhood based strategies.
- 8) Increase lead testing of children covered by Medicaid.
- 9) Diversify and increase funding to make homes lead-safe.

The City will also continue collaboration between CDGA, the Health Department and the Department of City Development to implement standardized processes for all affected CDBG-funded housing rehabilitation projects to ensure compliance with the HUD lead regulations. These processes include: the assumption of lead paint in rehabilitated structures, utilization of certified lead abatement contractors when removing lead, adoption and enforcement of lead safe work practices, occupant protection, providing lead safety classes, final inspections, lead dust clearance tests and lab analysis and subsidies for window abatement.

HOMELESS

Specific Homeless Prevention Elements

**Please also refer to the Homeless Needs Table in the Needs.xls workbook.*

1. Please describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

2. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

Action Plan Specific Homeless Prevention response:

**Please also refer to the Homeless Needs Table in the Needs.xls workbook.*

Persons with special needs as well as the homeless are an important concern for the City as it is recognized that addressing the needs of all citizens, regardless of their circumstance, is an essential component to strengthening neighborhoods.

To further the City's strategic goal of reducing and preventing homelessness and domestic violence in our community, the City will continue to allocate CDBG and Emergency Solutions Grant (ESG) funds for activities geared to assist homeless persons achieve stable housing and self-sufficiency. These funds will be provided to conduct outreach and homeless prevention activities, to operate emergency and transitional shelter facilities, provide supportive services, legal assistance and other services aimed at preventing and reducing homelessness for individuals, families, runaway/homeless youth, victims of domestic violence and mentally and physically disabled persons.

The jurisdiction will utilize a variety of resources to address homelessness in Milwaukee, including but not limited to: U.S. Dept. of Housing & Urban Development, State of Wisconsin Dept. of Health & Human Services, Emergency Food & Shelter Program(FEMA), State Runaway Grant, State of Wisconsin ESG/THP/HPP; City of Milwaukee ESG, City of Milwaukee CDBG, State Shelter Subsidy Grant, Homeless Prevention & Rapid Re-Housing; United Way of Greater Milwaukee, numerous foundations and individual donors.

In addition, the City will continue its involvement in the HUD Continuum of Care including involvement in activities to advance the 10-Year Plan to End Homelessness which is the plan approved by the City of Milwaukee as its jurisdictional plan to end homelessness.

Milwaukee Continuum of Care

The Milwaukee Continuum of Care is a community coalition comprised of over 100 member organizations including homeless service providers, local government, faith-based organizations, businesses, public school system, veterans' organizations, legal services agencies, housing developers, advocacy groups, community action agencies and consumers. Community Advocates functions as the Continuum's lead agency and fiscal agent; the Continuum functions as an unincorporated coalition with an elected/appointed steering committee comprised of 12 members. The Steering Committee includes appointees of the Mayor of the City of Milwaukee and the Milwaukee County Executive as well as the chairperson of the Shelter Task Force and the Continuum's HMIS (Homeless Management Information System) Coordinator; the remaining

members are elected to two-year terms by Continuum of Care members in good standing as evidenced by a consistent level of attendance and participation in the year preceding the election. The Steering Committee and the Continuum of Care are co-chaired Dan McCarthy of Zilber Development (private sector) and John Stibal of the City of West Allis (public sector).

The Continuum of Care is the primary vehicle by for advancing the 10-Year Plan. A critical element in the Plan strategy is the formation and strengthening of partnerships with key institutions and systems including housing development, mental health services, health care, and employment and training. In 2011, a Continuum of Care work group focused on the development of a coordinated entry system to improve access to homeless prevention, shelter diversion, community case management, emergency shelter and transitional housing as well as other services that can support housing stability. Other work groups are developing strategies to address health care discharge issues, increase employment opportunities, and support the development of permanent housing.

The Milwaukee Continuum of Care 10-Year Plan to End Homelessness includes a movement towards: a) enhanced homelessness prevention; b) greater emphasis on rapid re-housing for both families and individuals; and c) increased capacity to provide permanent supportive housing to people with disabilities.

Families and individuals come to shelters from a variety of situations from living on the street or in cars to situations where they have been doubling up with relatives or friends and are unable to continue that arrangement. During the past three years, the inability to pay rent, landlord-tenant issues and foreclosure of rental properties have exacerbated the number of people seeking shelter. Mental health, substance abuse and domestic violence are all major contributing factors; however, unemployment and poverty continue to be the root causes of homelessness in Milwaukee.

The Continuum of Care 2011 Point in Time Survey conducted January 26, 2011 provides the most accurate and up-to-date information about the specific characteristics of Milwaukee's homeless citizens. A total of 1,466 homeless people were counted. Of those, 852 homeless adults were interviewed; the data from those interviews are reported below.

Homeless Demographics	Number	Percent
Sheltered	720	84.5%
Unsheltered	132	15.5%
Female	346	41%
Male	491	59%
Veteran	107	23%
Homeless more than once in year	462	54.2%
Homeless a year or longer	253	30%
Chronically homeless	221	26%
Race: African American	528	63%
Race: Caucasian	208	25%
Race: Mixed Race	34	4%
Race: Native American	14	2%
Race: Asian	4	1%
Race: Other	16	2%

Homeless Household Status (N=816)	Number	Percent
Single or part of a couple without children	620	76%
Single or part of a couple with children under 18	196	24%

HMIS Data: The Milwaukee Continuum of Care homeless services providers utilize a shared Homeless Management Information System (HMIS) called ServicePoint to gather and analyze utilization data for the system's emergency shelters, transitional housing, permanent supportive housing, and supportive services programs. This information represents data collected by organizations funded by HUD Supportive Housing Program, Shelter + Care, and related programs as well as State Shelter Subsidy, State ESG, HPRP, and related programs. HMIS is coordinated for the Continuum of Care through a contract with Hope House of Milwaukee, Inc., which has developed and implemented a rigorous program of training, quality assurance, and corrective actions to insure that Milwaukee's homeless service providers are accurately entering data that can be used by the Continuum for program/system monitoring, gaps analysis, needs identification, and system improvement.

Priority Homeless Needs

- Homelessness Prevention
- Rapid Re-Housing
- Emergency Shelter/Transitional Housing
- Permanent Supportive Housing
- Behavioral Health and Other Supportive Services including Case Management
- Mainstream Benefit Assistance

In addition to these service needs, the chronically homeless population presents other challenges relative to their service and housing needs. First, the chronically homeless population is older than the homeless population in general; 75.4% of the chronically homeless are between the ages of 41 and 60 compared to 51.1% of the homeless population that is not chronically homeless. Chronically homeless are somewhat more likely to lack a high school diploma or GED (34.1% compared to 25.2% for homeless who are not chronically homeless). About one out of five (19.8%) chronically homeless persons is a veteran, often with mental health issues directly related to their service such as Post Traumatic Stress Disorder and depression. Many have been homeless a very long time; 32.7% have been homeless for more than three years. A third (35.3%) has been homeless five or more times in the past three years. In many cases, chronically homeless persons reported having been discharged without a place to live from an institution or facility: 14.6% hospital or health care facility; 8.3% mental health facility; 7.9% jail or House of Correction; and 3.2% prison. (2009 Point in Time, Comparison of Chronically Homeless to Non-Chronically Homeless). In summary, chronically homeless persons have complex issues which require individualized and sustained case management and supportive services above and beyond the provision of safe and decent housing.

Outreach/Assessment: The Milwaukee Continuum of Care will continue to operate street outreach through the Center for Veterans Issues, Health Care for the Homeless, Community Advocates Homeless Nursing Outreach Program and Street Beat operated by Walker's Point Youth and Family Center and Pathfinders, Inc. All are well-established programs that emphasize

working with hard-to-reach individuals living on the street or other locations not fit for human habitation. In addition, 2-1-1 @ IMPACT has established telephone procedures to identify callers' housing needs and to assist them in consideration of alternative solutions that may or may not involve a stay in emergency shelter. Each of these entities has developed outreach and assessment procedures unique to their target population. This year, the Continuum of Care established a Coordinated Entry Work Group to examine strategies for developing a coordinated entry approach, successfully utilized in many other cities across the United States. The Work Group, which is about midway in its planning, is currently seeking input on its preliminary recommendations and is planning to address implementation design issues in the coming months. The planning effort includes existing outreach and assessment mechanisms so as to ensure coordination and maximize resources.

In addition to these outreach methods, the Milwaukee Continuum of Care sponsors Project Homeless Connect. This year, the event was held October 20, 2011, at the Marquette University Union. On site, homeless people were able to access services for immediate needs, e.g. health checks, dental checks, clothing, haircuts, and food, and talk with agency and government representatives who can assist with mental health services, health care, housing, and employment. This year, Homeless Connect also featured an employment/resume writing opportunity which resulted in participants leaving the event with a flash drive holding their resume and other needed job search information. This is a critical outreach vehicle for bringing needed services under one roof, making it possible for a homeless person to access services that might otherwise take several months.

Emergency Shelters and Services: Milwaukee will continue to operate emergency shelter beds for families and individuals and Safe Havens for individuals with serious mental illness. In addition to the provision of physical shelter, emergency shelters and Safe Havens will provide assessment, service referral and case management support directed toward assisting residents to find a stable source of income and a permanent place to live. Depending on the individual shelter program, education, employment, health care and behavioral health services are also made available either on-site or through direct referral with partnering organizations. A study of the Milwaukee emergency shelter system was conducted in 2010/2011 which resulted in a report entitled "*At the Front Door: A System Improvement Review of Milwaukee's Emergency Shelter System.*" (Wilberg Community Planning (2011). This study identified opportunities to improve access and utilization of the existing emergency shelter inventory and provided information for the Coordinated Entry Work Group.

Transitional Housing: Milwaukee currently operates 742 transitional housing beds, 416 family beds and 326 individual beds. Currently, the CoC consultant, is conducting a system improvement review of the transitional housing system that includes site visits, interviews, review of policies and procedures, and analysis of HMIS data. This information will be presented in a report to the Continuum of Care Steering Committee and full Continuum of Care by the end of 2011.

Transition to Permanent Housing: The Milwaukee Continuum of Care adopted a Housing First approach in a strategic plan completed in 2005; this basic philosophy continues in the 10-Year Plan. In 2010, Milwaukee had 845 units of permanent supportive housing, 214 for families and 631 for individuals. Planned development of permanent supportive housing units will enable the Continuum to implement this approach in the coming years. A critical step in the transition to permanent housing is the acquisition of a reliable source of income. For that reason, the 10-Year Plan emphasizes improved utilization of mainstream benefits, specifically increased enrollment in SSI/SSDI which provides income as well as health care coverage for physical and mental health needs. Employment is another critical part of being able to maintain permanent housing. The 10-Year Plan includes an employment component that will improve the connection of homeless people to the employment and training resources available through the Milwaukee Area Workforce Investment Board, specifically focusing on resources to bring academic skills up to a point where homeless individuals can be considered for inclusion in MAWIB supported training

programs in the skilled trades. Further, the 10-Year Plan includes planning for a possible social enterprise modeled on successful homeless businesses operating in other cities that provide homeless people with practical job skills and help develop stronger work habits. Addressing the income challenge is fundamental to sustainable permanent housing.

3. Chronic Homelessness

The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

Chronic Homelessness Response:

The 2011 Milwaukee Point in Time Count identified 221 individuals who met the HUD definition of chronically homeless, namely, a disabled individual adult or disabled adult in a family who has been homeless for one year or more or four or more times during the past three years. (It is important to note that this number may underestimate the number of chronically homeless because not all such persons frequent the known places, e.g. meal programs, libraries, and identified encampments or gathering places that were the subject of the point in time count.) Chronically homeless individuals face critical issues which must be addressed in efforts to eliminate chronic homelessness. Data from the 2009 Point in Time related to persons categorized as chronically homeless follow:

- 55.3% suffer from mental illness
- 49.0% have other medical conditions or physical disabilities
- 45.5% have alcohol abuse problems
- 37.9% drug abuse problems
- 18.2% have developmental or learning disabilities

Despite the high rate of disabilities, as of 2009, only 24.1% of chronically homeless were currently receiving SSI (Supplemental Security Income) or SSDI (Social Security Disability Income) to establish a minimum level of monthly income. Only 19% of chronically homeless were employed either full or part-time. The combination of high disability rates and high prevalence of individuals with no income (either from employment or SSI/SSDI) requires a comprehensive cross-system strategy.

The Milwaukee Continuum of Care proposes a three prong strategy to address chronic homelessness:

- 1) **Outreach to chronically homeless individuals** that will engage individuals in activities to meet basic needs, access community services, engage in treatment for health, mental health, and addiction issues, apply for benefits for which they are eligible, and utilize available housing resources. The building of a strong trusting relationship is critical to the willingness of many chronically homeless persons to become involved with the services system.
- 2) **Permanent supportive housing** that will provide affordable, safe housing with on-site or quickly accessible supportive services including case management, peer support, and access to health, mental health, and addiction treatment.
- 3) **Income generation** through one of two mechanisms: a) receipt of SSI/SSDI through the provision of intensive SSI/SSDI application and advocacy services through the SOAR Program; or, b) engagement in job readiness, skills development, and employment through specially tailored homeless employment initiatives as well as through the regular employment market. This strategy is included as a major element of the Continuum's 10-Year Plan to End Homelessness.

The Continuum will utilize the full resources and expertise of its extensive membership. The Continuum will also continue its participation on the Commission for Supportive Housing which is primarily focused on the development of permanent supportive housing for persons with mental illness, including those who are homeless and chronically homeless.

In addition, the Continuum will work with new partners. With regard to the development of additional permanent supportive housing units, the Continuum will continue to expand its partnerships with nonprofit housing development organizations to include local and regional entities with proven expertise in developing, operating and maintaining permanent housing for persons with disabilities, especially individuals with mental illness. With regard to income generation, the Continuum will continue to develop employment initiatives in collaboration with the Milwaukee Area Workforce Investment Board (MAWIB) and individual homeless service providers with expertise in job readiness and job placement. Enhanced SSI/SSDI application services will be provided through an expansion of the SOAR Program, an intensive application/advocacy system that has produced an extremely high SSI/SSDI approval rate for persons.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Homeless Prevention Response:

The Milwaukee Continuum of Care has redesigned its homelessness prevention strategy to create a stronger early intervention system to keep people housed. This strategy is incorporated into the 10-Year Plan to End Homelessness and is the foundation for Milwaukee's Homeless Prevention and Rapid Re-Housing Program. The strategy includes the following elements:

- a) **Landlord/tenant mediation** including dispute resolution, case management and the provision of short-term rental assistance to individuals and families who are at imminent risk of eviction and homelessness. Activities in this area have been supported by HPRP funding; continuation of services is currently being addressed by participating agencies.
- b) **Legal services** including eviction prevention assistance to low-income renters who are at risk of homelessness due to nonpayment of rent, foreclosure, or other circumstance. Activities in this area have been supported by HPRP funding; continuation of services is currently being addressed by participating agencies.
- c) **Development of a discharge coordination policy.** (See #5 below)
- d) **Redesign and implementation of an effective central intake/referral/diversion system** that will effectively and appropriately redirect individuals and families to utilization of family and community supports to prevent homelessness and a resulting shelter stay when those resources are available. The effort is currently underway through the Coordinated Entry Work Group.

The Continuum of Care's 10-Year Plan to End Homelessness supports homelessness prevention through a three-pronged strategy to: 1) raise community awareness and involvement in homelessness prevention; 2) stabilize at-risk individuals and families through discharge coordination, landlord-tenant mediation and short term rent assistance; and, 3) support central access to homeless services and information that incorporates sound diversion practices.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Discharge Coordination Policy Response:

The Milwaukee Continuum of Care 10-Year Plan to End Homelessness, includes a specific goal and objective relating to the development of a discharge coordination policy that will prevent homelessness resulting from discharge from foster care, health care facilities, mental health facilities and corrections. Up to this time, the Continuum of Care has relied upon individual agreements which have been included in the annual Exhibit 1 submission to HUD. However, it has been determined that a community-wide approach is preferable as it would generate greater compliance and more consistently result in the prevention of homeless episodes for these vulnerable populations.

The Prevention and Emergency Services Work Group of the 10-Year Plan included discharge planning as one of its top priorities for its package of recommendations for inclusion in the final 10-Year Plan. The relevant goal recommended by the Prevention and Emergency Services Work Group is "To stabilize at-risk individuals and families to prevent homelessness." The specific corresponding objective is "To target prevention efforts to people leaving institutional settings including psychiatric inpatient care, corrections, hospitals, and foster care through the establishment of a discharge coordination policy."

Currently, the Continuum of Care has a designated Discharge Planning Work Group which has worked throughout 2011 to identify the causes of hospital discharges to the street or shelter and to develop strategies, in collaboration with health care institutions, to reduce the incidence of such discharges. The Work Group plan is to develop an agreement that can be approved by the local hospital systems and would significantly reduce hospital discharges to the street/shelter in 2012.

Housing Emphasis: HUD continues to emphasize the need to utilize HUD dollars to support housing costs and to find other sources of funding to support the provision of supportive services. Many of the Milwaukee Continuum of Care projects have been able to increase the percentage of funding committed to housing versus supportive services (housing emphasis) although this is extremely difficult without the establishment of new funding sources for supportive services. Some states have established separate supportive services funding programs to support the provision of these needed services for chronically homeless residing in HUD-supported permanent housing units. This is an area that needs further exploration in Wisconsin. Several partnerships between permanent housing development entities, for profit and non-profit organizations, and homeless service providers have enabled the establishment of new permanent supportive housing for persons with mental illness and the chronically homeless. This is a model for further development.

Permanent Housing Retention: HUD-funded permanent housing projects in the Milwaukee Continuum of Care exceeded the national HUD standard in 2010 with 87% of persons in Permanent Supportive Housing staying for six months or longer. High quality case management and careful monitoring assure continued high performance in this area. The Continuum of Care Permanent Housing Work Group is monitoring performance of permanent supportive housing in 2011 and working on the development of service standards which would guarantee case management/supportive services quality in the future.

Transitional Housing Performance: HUD-funded transitional housing programs, as a group, exceeded the national transitional housing benchmark with 69% of exiting persons moving to permanent housing. Nine of the twelve transitional housing programs exceeded the national standard of 65%; those that fell below the standard are high volume programs which serve the hardest-to-serve population. Strategies for improving transitional housing outcomes will be considered as part of the transitional housing system improvement review currently underway.

Employment: Employment for homeless persons is a critical policy and program development focus of the Milwaukee Continuum of Care. Research conducted for the Continuum through its Employment Committee determined that homeless people encounter numerous barriers to finding

sustainable jobs and in admission to skilled trades training programs. While many of these barriers have to do with personal issues, i.e. addiction, poor work history, other barriers have to do with how employers view homeless people and, with regard to training programs, with how programs establish eligibility criteria, schedule and site training programs, and provide training stipends. As important as some of the ongoing barriers to employment, is the rapidly declining economic situation in Milwaukee, Wisconsin, and the U.S. in which lay-offs, job loss and plant closings are becoming more commonplace. This means that competition for available jobs is even greater than in the past several years.

Employment is also a major issue relative to the increasing numbers of persons with disabilities served by the Milwaukee system. For these individuals, a successful outcome is enrollment in an ongoing income support program such as SSI or SSDI. In these cases, employment is not an option.

The Employment Work Group of the Continuum of Care has developed a resource inventory and training plan to ensure that all case managers in the homeless services system are aware of available resources and able to make effective referrals for their clients. Also, the Work Group has developed a specialized employment fair to be conducted in conjunction with Project Homeless Connect. Additional efforts to establish partnerships with employment and training entities in Milwaukee are also underway.

Homeless Households with Children: The HUD Supportive Housing Program funding allocation approach has favored permanent housing for chronically homeless individuals for several years. For the past two years, HUD has allowed projects serving homeless families with disabilities including chronically homeless adults in families to be the target population for bonus projects. The development of additional permanent housing resources, through new construction or leasing, is seen as essential for reducing the number of homeless households with children. Also important is the strengthened collaboration between the Continuum of Care and the Milwaukee Public School Homeless Education Program. Currently, the HEP manager is an elected member of the CoC Steering Committee. The HEP has developed stronger ties with individual shelter and transitional housing programs to ensure continuity in educational services to homeless children and always assists families in finding resources to support housing stability and prevent homelessness.

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS HOMELESS-CDBG Funds					
Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2012 benchmarks (# served)
Emergency & Transitional Shelter & supportive services	Provide emergency shelter & transitional housing & supportive services to promote housing stability & independence	Suitable Living Environment	Availability/ Accessibility	# low income, homeless persons achieving housing stability, safety & independence	6,100 (CDBG funds)

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS HOMELESS-ESG Funds					
Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2012 benchmarks (# served)
Street Outreach, Emergency & Transitional Shelter & supportive services, Homelessness Prevention	Provide emergency shelter & transitional housing & supportive services to promote housing stability & independence	Suitable Living Environment	Availability/ Accessibility	# low income, homeless persons achieving housing stability, safety & independence	5,600 (ESG funds)

Emergency Solutions Grants (ESG)

1) If applicable, describe how the ESG matching requirements will be met.

PY 2012 Action Plan ESG response:

The City of Milwaukee will utilize CDBG funds to meet the ESG match requirements.

2) (States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Not Applicable

NON – HOMELESS SPECIAL NEEDS

(91.220 (c) and (e))

**Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.*

**If not using the CPMP Tool: Complete and submit Table 1B.*

**If using the CPMP Tool: Complete and submit Needs Table/Non-Homeless Needs*

1. Please describe any supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems).

PY 2012 Action Plan Non-homeless Special Needs response:

Persons with disabilities face challenges in accessing affordable housing. While the demand for housing within the general population is great, persons with disabilities are dually disadvantaged by economic factors and the need for special housing features. The demand for housing for the disabled exceeds the supply. Waiting lists for subsidized, barrier-free units average several years. There is a great need to increase the assistance needed by people with disabilities who rent. While there are programs for people with disabilities who are homeowners, individuals who rent do not have many options, or the options are very limited due to long waiting lists.

There is also a significant need to increase the number of Section 8 vouchers. Many subsidized complexes have opted not to renew their contract reducing the number of affordable rental units. Section 8 vouchers increase integration into the community by providing more choices to the individual with a disability.

The elderly in our community face many challenges including limited income, maintenance and repair of their homes, the need for accessible units, the need for assisted living and the desire for safe neighborhoods, transportation needs and access to social services.

The City, in its efforts to address the needs of persons with disabilities and the special needs of the elderly, will undertake the following:

CONSOLIDATED PLAN STRATEGIC GOAL: Address the housing and supportive services needs of Non-Homeless Special Needs Populations to promote a suitable living environment.

2012 Annual Action Plan - Implementation Strategy:

1. Support the construction and rehabilitation of housing units for the disabled.
2. In all housing rehabilitation activities, to the extent possible, address any unmet needs of persons with disabilities before, during and after rehabilitation of relevant units.
3. Support the Housing Accessibility Program to construct handicapped accessible ramps and other accessibility modifications for persons with physical and other disabilities.
4. Maximize the use of elderly public housing developments.
5. Provide housing and supportive services to persons with HIV/AIDS.

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS NON HOMELESS & SPECIAL NEEDS POPULATIONS					
Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2012 benchmarks
Housing units for disabled persons	Increase the supply of affordable housing units	Suitable Living Environment	Sustainability	#affordable housing units constructed for low income disabled persons	5
Accessibility Improvements for disabled	Construct handicapped ramps and & other accessibility modifications	Suitable Living Environment	Availability/ Accessibility	#accessibility improvements constructed for low income disabled persons	25
Employment Services	Provide Job placement & Job Training & Placement services	Suitable Living Environment	Sustainability	#low income persons trained & placed in jobs	10
Housing & supportive services for persons with HIV/AIDS	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	See HOPWA section

COMMUNITY DEVELOPMENT

**If not using the CPMP Tool: Complete and submit Table 2B, Table 1C Summary of Specific Objectives.*

**If using the CPMP Tool: Complete and submit the Needs Worksheets/Non-Housing Community Development and Summary of Specific Annual Objectives Worksheets or Summaries.xls*

1. Identify the estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income (an amount generally not to exceed ten percent of the total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns.)

PY 2012 Action Plan Community Development response:

See Proposed Expenditures Worksheet located in the Additional Files Folder.

2. CDBG resources must include the following in addition to the annual grant:

a. Program income expected to be received during the program year, including:

i. The amount expected to be generated by and deposited to revolving loan funds;

PY 2012 Community Development response:

See Proposed Expenditures Worksheet located in the Additional Files Folder.

ii. The total amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

PY 2012 Community Development response: Not Applicable

b. Program income received in the preceding program year that has not been included in a statement or plan;

PY 2012 Community Development response:

See Proposed Expenditures Worksheet located in the Additional Files Folder.

c. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives in its strategic plan;

PY 2012 Community Development response: Not Applicable

d. Surplus funds from any urban renewal settlement for community development and housing activities; and

PY 2012 Community Development response: Not Applicable

e. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

PY 2012 Community Development response: Not Applicable

3. If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:

- a. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:
 - i. amend or delete activities in the amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process),
OR
 - ii. obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit),
OR
 - iii. agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.

PY 2012 Community Development response:

Not Applicable

4. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs, public facilities, public improvements, public services and economic development. (Use of Table 2B or the Community Development Needs Table is sufficient, additional narrative is not required)

PY 2012 Community Development response:

See Community Development Needs Table located in the Additional Files Folder.

- a. For activity for which the jurisdiction has not yet decided on a specific location, such as when a jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, provide a description of who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.

PY 2012 Community Development response: Not Applicable

5. An "urgent need" activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.

PY 2012 Community Development response:

If unexpected and catastrophic situations occur, the City may choose to fund activities under the category of "urgent needs." However, at this time, it cannot be determined.

6. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

(Use of Table 2B or the Community Development Needs Table and Summaries Table is sufficient, additional narrative is not required)

PY 2012 Community Development response:

See Community Development Needs Table and Summaries Tables located in the Appendix.

As stated and documented in the 2010-2014 Consolidated Plan, there are a number of issues facing residents of Milwaukee that have an impact on economic development in the City and jobs for residents. Some of these are:

- ❖ The loss of thousands of manufacturing jobs in the City of Milwaukee over the past several decades while the suburbs gained more than 30,000 (*U.S. Census Bureau 2000*).
- ❖ Lack of private transportation presents a serious barrier to employment for central city residents interested in jobs in outlying areas such as Waukesha, Ozaukee and Washington counties or areas of Milwaukee County not easily reached by public transportation.
- ❖ The lack of a valid driver's license continues to prevent many central city persons from accessing available jobs in outlying areas.
- ❖ Racial Inequality-Milwaukee "leads" the Frostbelt in racial inequality and measures of economic distress in the black community.
- ❖ Disparities in real median family income for Whites and Blacks and other minorities in metro Milwaukee.
- ❖ High poverty rate among Blacks in the city of Milwaukee of 33.3%, higher than the national average of 24.9%, and the highest rate among the Frostbelt cities.

The City of Milwaukee's ***Economic and Community Development 5-Year Strategy*** focuses on creating viable neighborhoods which will lead to a reduction in crime, increased property values, greater economic vitality and opportunity, which will ultimately improve the quality of life for community residents, businesses and other stakeholders. This strategy will be accomplished through careful coordination of public and private resources, with an emphasis on revitalizing neighborhoods through the targeting of resources. The Consolidated Plan emphasizes the interrelationships and the need for the expansion of opportunities in the areas of education, employment, economic development and housing.

The City of Milwaukee's top priority is to retain existing businesses, to recruit new employers and to assist Milwaukee firms in both the retention of existing jobs and generating new job creation. All of the City's economic development activities are intended to make the City a partner with private enterprise in the hope of ensuring the health of Milwaukee's economy.

It should be noted that the City's overall economic development plan is primarily City-funded with a portion funded with CDBG funds.

CONSOLIDATED PLAN STRATEGIC GOAL: Viable and Sustainable Neighborhoods through Job Creation & Retention/Business Development/ Expansion & Retention.

Create viable and sustainable neighborhoods by retaining businesses and jobs in the City; recruit new employers and assist Milwaukee firms in generating opportunities for new job creation leading to greater economic vitality, ultimately improving the quality of life for City residents, businesses and other neighborhood stakeholders.

2012 Annual Action Plan - Implementation Strategy:

- 1) Create family-supporting jobs through aggressive economic development activities.
- 2) Promote and fund the expansion of small businesses and other micro-enterprises to create new jobs.
- 3) Foster investment and cluster developments in neighborhood commercial areas; redevelop/rehab retail sites to facilitate new job creation.
- 4) Support and be a partner in job creation efforts such as the *Emerging Business Enterprise Program*, the *Milwaukee Area Workforce Investment Board*, the various *Revolving Loan Funds* operated by community-based agencies to provide loans and grants to businesses to facilitate job creation and business expansion in the City.
- 5) Support redevelopment of residential, commercial and industrial Brownfield properties such as efforts in the 30th Street Industrial Corridor, former Tower Automotive site, Menomonee Valley and throughout the CDBG target area neighborhoods.
- 6) Support commercial and other major developments such as Large Impact Catalytic Developments to facilitate job creation and affordable housing in targeted areas.
- 7) Partner with other economic development programs that are successful in creating jobs for low income persons.
- 8) Support skilled job training and placement programs and educational and English proficiency programs.
- 9) Support programs and initiatives which assist in removing employment barriers for low-income households, e.g. driver's license recovery, walk-to-work programs and those that provide access to an array of wrap around social, educational, employment and lifeskills services.
- 10) Create homeownership opportunities for residents and improve the condition and affordability of rental housing in Milwaukee.

**SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS
ECONOMIC DEVELOPMENT**

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2012 benchmarks
Economic Development-Direct financial and/or technical assistance to for profits	Provide technical or financial assistance to businesses	Expand economic opportunities	Sustainability	#new businesses and new jobs created for low income persons	50
Revolving Loan Fund Program	Provide loans to businesses to create jobs	Expand economic opportunities	Sustainability	#new businesses and jobs created for low income persons	15
Emerging Business Enterprise Program	Provide assistance/City certification to businesses to created jobs	Expand economic opportunities	Sustainability	#new jobs created for low income persons	10

See also Community Development Needs Table.

PRIORITY NEEDS - YOUTH

Youth needs fall into five key areas:

1. ***Safe and stable families*** – youth need to live in family environments that meet basic needs for housing, food, clothing, and health care and that are safe in terms of being free from child abuse and neglect and domestic violence.
2. ***Vocational preparedness*** – youth need education and academic support that will provide them with necessary knowledge to be productive citizens and good parents and prepare them for post-secondary skills training or college and they need employment opportunities to provide them with income as well as practice in developing good work habits and skills.
3. ***Delinquency prevention*** – youth need information, support, activities, and intervention that will deter them from involvement in delinquency, violence, and gang activity and that will prevent recidivism among youth offenders.
4. ***Alcohol and other drug abuse prevention*** – youth need education, support, activities, and intervention regarding their use of tobacco, alcohol, marijuana, and other drugs so they are able to make sound decisions regarding their AODA behavior and seek help when needed.
5. ***Teen pregnancy and STD prevention*** – youth need opportunities to envision a long-term future that requires that they not become teen parents along with education regarding resistance skills, abstinence and contraception education, and appropriate health care and counseling.

Effective Program Approaches

- ***Accessibility:*** Program location, hours of operation, and participation requirements support accessibility by a broad spectrum of the community.
- ***Dosage:*** Programming is provided on a frequent basis, ideally 3-5 days per week, so that activities are readily available for youth and families seeking activities or assistance.
- ***Culturally-appropriate:*** Programs are provided by staff which reflect the cultural composition of the target population, include persons of different ethnicities/races in their governance, and are located in diverse neighborhoods.
- ***Relationship-focused:*** Emphasis on building sustained trusting relationships between youth and trained, caring adults is a critical component of effective programming and is a necessary prerequisite to the effectiveness of evidence-based practices.
- ***Evidence-based practices:*** Programs incorporate approaches, curricula, and materials that have been proven effective through rigorous evaluation and/or documented theory.
- ***Comprehensive:*** Programs provide diverse, as opposed to single purpose, opportunities for youth involvement and are capable of helping youth and their families address other issues through direct service or referral to community resources.
- ***Sustainability:*** Programs are supported by fiscally sound, well-run organizations and have multi-year funding available to insure that successful programs are sustained; participants are able to trust that the program will be an ongoing resource.

There are several positive trends in Milwaukee that are the result of the community's efforts to develop and maintain a strong neighborhood-based youth and family development structure through support from the Community Development Grants Administration, Milwaukee Brighter Futures, Safe and Sound, United Way and other resources. Critical areas of concern require attention and program support, namely the high rate of child poverty and homelessness along with continuing concerns regarding educational attainment, alcohol and other drug abuse and involvement in violent and other risky behavior.

CONSOLIDATED PLAN STRATEGIC GOAL: Improve the lives of youth through prevention and intervention programs that are widely accessible to youth and programs which provide education, work skills and lifeskills development.

2012 Annual Plan - Implementation Strategy:

- 1) Provide Job Readiness, Vocational and Customized Training to provide young people with real world work experiences and skills needed in today's workforce; and to help build a strong work ethic and connections with employers.
- 2) Support the City's Summer Youth Internship Program for high school youth to provide internships in City government and in the private sector.
- 3) Invest in life skills development and programs to improve educational achievement.
- 4) Support prevention and intervention programs for at-risk youth to help decrease youth violence and to help youth develop self-esteem, self confidence, goal-setting and attainment skills.
- 5) Support neighborhood-based youth development programs, which provide outreach and access to high quality prevention and intervention programming including tutoring, mentoring, teen pregnancy prevention, safe havens and recreation.
- 6) Support for interventions targeted at dealing with the aftermath of violence – within the family and the larger community – as a strategy for preventing future violent behavior.
- 7) Civic Engagement-providing internships and apprenticeships for youth by involving them in leadership roles and community development opportunities within Milwaukee's nonprofit sector.

PRIORITY NEEDS: PUBLIC SAFETY and QUALITY OF LIFE

Public Safety remains a dominant concern in central city Milwaukee. Crime or the perception of crime in neighborhoods is a frequently cited consideration for residents moving out of the City and is one of the most frequently voiced concerns of residents through community surveys and community meetings. Actual crime or the perception of crime has real economic and community development costs as businesses may relocate, investment in businesses and housing may be deterred, and consumer spending may flee the City, eroding the City's tax base and ability to provide essential public services.

COMMUNITY ORGANIZING and CRIME PREVENTION

Community organizing agencies collectively build and enhance neighborhood networks through ongoing community meetings, face-to-face surveys, and other outreach efforts to leverage strategic public and private investments. This approach creates change within the NRSA and allow for community impacts that are greater than the sum of individual projects.

A large number of community organizers work collectively with key stakeholders and community residents addressing crime and violence, and other "quality of life" issues within the NRSA's. Many community organizers have specialized skill sets in areas such as youth development, crime prevention, senior services, economic development and housing services. Specific issues and community concerns are addressed by organizers with in-depth knowledge of the topic through information dissemination, training, and community and peers networking.

Organizing around crime prevention/safety remains an important “link-pin” to many other more specific community issues such as employment, economic development, after-school activities, pregnancy prevention, housing, and a wide variety of other topics. Although a variety of communication methods are utilized, door-to-door, personal contacts remain the most effective outreach method by organizers in the NRSA target area.

CONSOLIDATED PLAN STRATEGIC GOAL: Promote a suitable living environment through public safety initiatives, community organizing and other efforts which engage residents in accessing and maximizing the use of law enforcement resources to reduce crime, fear and disorder which hinder community development.

2012 Annual Action Plan - Implementation Strategy

- 1) Follow the lead of the Milwaukee Police Department (MPD), which has implemented a data-driven crime prevention and intervention strategy. Personnel and resources associated with the MPD are now driven through criminal activity determined by crime activity trends. An important element to this strategy is nurturing resident buy-in and support.
- 2) Continue to sustain anti-crime efforts at the neighborhood level through resident participation at monthly crime prevention and information meetings in Milwaukee Police Districts, 2, 3, 4, 5 and 6. The Milwaukee Police Department provides crime trend information, works and communicates with residents and community based organization representatives to highlight area “hot spots”, discuss prevention strategies and develop a comprehensive prevention approach to quality of life nuisance issues in the community.
- 3) Maintain the Community Prosecution Program at the police district level. In police districts 2 and 5, the Community Prosecutors work with the Milwaukee Police Department in developing an outreach strategy that focuses on formerly incarcerated individuals who are re-entering the neighborhood. Working with the State of Wisconsin-Department of Corrections, community representatives and other concerned residents, the Community Prosecutors are engaged in group call-ins that offer those re-entering the community the opportunity to more fully and positively re-integrate into the neighborhood. Call-ins area also utilized for residents who have known involvement in drug dealing. At the call-in, individuals are offered one more chance to change their behavior, while at the same time provided with specific resources to resolve personal and economic issues (drug treatment, job training, education, etc.)
- 4) In addition to the work delineated above, continue to support the role of the Community Prosecutors as liaisons with neighborhood organizers and residents. Together, they work to reduce and/or eliminate “quality of life” nuisance issues (loud music, prostitution, problem houses, code violations, excessive noise, etc.), which degrades neighborhood peace and value.
- 5) Preserve the development of the foundation of community strength – block watches. Adjunct organizational efforts include; building and expanding on crime prevention within the small business community, landlord compacts, support and advance leadership training among residents and cultivate coordinated activities between and among community, faith and other groups within each neighborhood.
- 6) Utilize community contacts to engage a wide variety of residents and entities (youth, adults, schools, faith-based organizations, businesses, etc) in events and activities that promote communication, neighborhood pride and camaraderie. Activities include clean-ups, graffiti abatement, housing improvement, informational events.

-
- 7) Use community contacts to initiate and facilitate community forums to determine neighborhood-specific action issues.
 - 8) Draw upon developed neighborhood relationships to plan and present information to residents, businesses and other invested entities in areas that resonate with the needs of the community.

PRIORITY NEEDS: ENVIRONMENTAL ISSUES

The City will continue to protect the health and safety of all City of Milwaukee residents and improve neighborhood quality of life through an increase in economic vitality and property values. The Environmental Planning and Review Program continues to be a high priority for the City of Milwaukee in order to protect the residents from identified and unidentified environmental hazards and will continue to provide the environmental review required to comply with HUD 24 CFR Part 58 for numerous City and City-assisted projects. In addition, the program provides support for economic development in the City through investigating and remediation of contaminated properties.

Primarily, the program is responsible for preparing environmental audits of properties within the City of Milwaukee by considering public health hazards and conducting risk analysis in support of economic development. The program also provides technical guidance on a broad range of environmental and public health issues to other City agencies including the Health Department, the Department of City Development, Department of Neighborhood Services, City Attorney's and Treasurer's Office, Redevelopment Authority(RACM), Housing Authority, Department of Public Works, Milwaukee Economic Development Corporation(MEDC) and the Port of Milwaukee. Finally, the Program works with state and federal agencies and private entities such as developers, attorneys, architects, engineers, and environmental consulting firms to limit community exposure to environmental hazards and associated public health risks.

The long-term and short-term objectives of the Environmental Planning and Review Program include:

- ❖ Supporting the City's efforts in private and public development through assuring the protection of health, safety, and the environment. This can be measured through environmental reports summarizing site reviews, soil and groundwater sampling results and cleanup of contaminated properties before sale or development.
- ❖ Supporting the City's efforts in developments which can be measured through a comparison of money expended for investigation/ remediation to the property value increase and jobs created.
- ❖ Efficient coordination for the review and approval of the CDBG-funded projects and Environmental Impact Assessments to assist in timely release of federal funds. This can be measured by actual developments supported and an increase in tax base for the City (as measured by the City Treasurer's Reports).
- ❖ Avoidance of environmental liability and increased tax collection through screening tax-delinquent properties for possible foreclosure which is measured through the number of properties the program researches or conducts site visits on (500 properties per year). This can also be measured through the number of tax-delinquent properties on the City "Do Not Acquire" list as measured in the City Treasurer's and Attorney's Offices (< 200 properties).

CONSOLIDATED PLAN STRATEGIC GOAL: Environment

Protect the public health and safety of City residents through the reduction of adverse environmental exposures associated with all City properties but primarily for undeveloped brownfields. Increase the economic value associated with the redevelopment of brownfields and subsequent increases in city-located businesses, jobs and increased commercial property tax levy.

2012 Annual Action Plan - Implementation Strategy:

- 1) Inspect properties for environmental conditions that may pose hazards to nearby residents.
- 2) Coordinate, review and approve approximately 1,000 CDBG Planning Reviews, as required by HUD 24 CFR Part 58, in order to complete the "Release of Federal Funds" forms.
- 3) Prepare an estimated 12 CDBG Environmental Impact Assessments annually for local agencies, such as community/neighborhood groups and as required by HUD 24 CFR Part 58, in order to complete the "Release of Federal Funds" forms.
- 4) Assist local HUD staff in conducting environmental reviews through HUD's 24 CFR Part 50 Requirements.
- 5) Screen hundreds of tax-delinquent properties for possible foreclosure and to avoid environmental liability.

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS

COMMUNITY DEVELOPMENT ACTIVITIES

Program Category	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2012 benchmarks
Public Services-Employment Services	Provide Job Placement/Job Training & Placement assistance for low income persons	Suitable Living Environment	Expand economic opportunity	# low income persons trained & placed into jobs	135
Public Services-Youth Services	Increase employment, education, recreation, mentoring, tutoring, teen pregnancy prevention, safe havens for youth	Suitable Living Environment	Sustainability	# youth with increased access to services	11,630
Public Services-Crime Awareness & Community Organizing	Facilitate residents/stakeholder in community improvement efforts; crime prevention initiatives	Suitable Living Environment	Sustainability	# residents & stakeholders engaged in community improvement efforts	3,000
Public Services-Community Prosecution Program	Abate neighborhood nuisances & drug houses through prosecution	Suitable Living Environment	Sustainability	# properties & nuisances abated/resolved	100
Public Services-Driver's License Recovery	Assist low income persons with driver's license recovery & other supportive services	Suitable Living Environment	Sustainability	#low income persons obtaining a valid driver's license	125
Public Services-Homebuyer Counseling	Provide homebuyer counseling & budget counseling for 1 st time homebuyers	Suitable Living Environment	Sustainability	#low income persons obtaining a home mortgage loan	100
Acquisition of Real Property	Acquire blighted properties for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	3
Cleanup of Contaminated Sites – (Brownfields)	Remediation of Brownfields for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	10

HOME INVESTMENT PARTNERSHIPS

1. Describe other forms of investment not described in § 92.205(b).

PY 2012 Action Plan HOME response:

The City does not intend to use other forms of investment as described in regulations at 24 CFR 92.205(b).

2. Describe how HOME matching requirements will be satisfied.

PY 2012 Action Plan HOME response:

HOME matching requirements will be satisfied through City-owned appraised land/real property, foregone taxes, fees, charges and City bond financing.

3. If the participating jurisdiction (PJ) will use HOME funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

PY 2012 Action Plan HOME response:

Resale Provisions - First-time homeownership activities recapture guidelines are clearly defined in the contract between the City and all subrecipients. It is enforced with an active 5-year covenant that is secured by a mortgage at time of closing, to ensure affordability of units acquired with HOME funds.

In consideration of any assistance furnished through the City the new assisted owner must agree to the following:

- a. Continue to occupancy the housing as his/her principal residence until the end of the **Period of Affordability**. Should the Owner not continue to occupy the property as his/her principal residence until the end of the **Period of Affordability**, the principal amount of the HOME Program Note then outstanding shall become immediately due and payable to the City.
- b. If Owner sells, contracts to sell, convey or otherwise transfers Owner's present interest in the Property within the period of five years after the date hereof without prior such sale, contract to sell, conveyance or other transfer, obtaining the written consent of the City to such sale, conveyance, or transfer, the principal amount of the HOME Program Note outstanding on the date of sale, conveyance, or transfer shall become immediately due and payable.
- c. Owner further agrees on behalf of the Owner's heirs, personal representatives, successors and assigns that Owner's obligations hereunder shall constitute a covenant running with the land, which shall at the option of the City of Milwaukee be enforceable against the Property.

Payment of Appreciation in Value to City. If Owner sells, contracts to sell, conveys or otherwise transfers Owner's present interest in the Property, Owner shall pay to the City a portion of the Appreciation in the value of the Property, in accordance with the repayment schedule set forth below. The amount of the Appreciation in the value of the Property shall be calculated as follows: the amount of the sale price received by Owner for the Property, less the amount of the original sale price paid by Owner for the Property, and less any seller-paid costs of closing. After repayment, the Owner is free to sell the home to any buyer at any price. Should the Owner net insufficient funds from the sale of the property to repay the principal amount then due and owing based on the schedule below, the City may (but is not required to) forgive a sufficient portion of the amount due to the City so as not to have the Owner contribute additional funds when selling the property.

Repayment Schedule

Year in Which Disposition Occurs (After Dated Date of this Agreement):	Portion of Appreciation Due to the City:
1 Year or less	100%
2 Years or less	80%
3 Years or less	60%
4 Years or less	40%
5 Years or less	20%
After 5 Years	0%

4. Describe the policy and procedures the PJ will follow to affirmatively market housing containing five or more HOME-assisted units.

PY 2012 Action Plan HOME response:

Affirmative Marketing

(In conformance with the HOME Final Rule 24CFR 92.351)

(Also, see *Affirmative Marketing Plan* in Year 3 Additional Files folder)

The City has multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

The City of Milwaukee has an Affirmative Marketing Plan which is used to assist the City and its funded agencies on affirmative marketing procedures as required by federal regulations of the U.S. Department of Housing and Urban Development. This Plan details specific affirmative marketing and outreach that project sponsors must utilize for any HOME-assisted project of five or more units.

In addition, all CDGA-funded units are developed as turnkey style developments and must be affirmatively marketed by the agency to ensure that they are available to the general public. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status or disability.

The marketing of properties may begin anytime following feasibility approval by CDGA, given the availability of clear and concise information about the finished product. Critical information such as asking price, estimate appraised value, estimated housing costs, floor plans and drawings/renderings must be provided to all interested persons.

Acceptable marketing methods included:

- ❖ Community Homes Homeownership List
- ❖ Phone inquiries
- ❖ Signs on properties
- ❖ Internet
- ❖ Open house events at the property
- ❖ Homeownership fairs
- ❖ Cooperation with homebuyer counseling agencies

The pre-sale of housing units produced under the City's Housing Production program is prohibited. If a property is affirmatively marketed and an eligible buyer is identified prior to the completion of the project, an offer to purchase may be accepted by an agency. However, transfer of ownership may not occur prior to receipt of a certificate of occupancy or code compliance. Additionally, in the case of housing rehabilitation, lead clearance must also be obtained from the Milwaukee Health Department prior to ownership transfer.

5. Describe actions to be taken to establish and oversee a minority outreach program within the jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking, underwriters, accountants, and providers of legal services, in all contracts, entered into by the PJ with such persons or entities, public and private, in order to facilitate the activities of the PJ to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

PY 2012 Action Plan HOME response:

Outreach to Minority and Women-Owned Businesses - The City of Milwaukee will continue its long and successful history of outreach to Minority, Disadvantaged and Women-owned businesses. The City's contract with sub-recipients includes a provision regarding affirmative outreach efforts to increase the involvement of the businesses. Some of the steps taken to increase involvement include: advertising in community newspapers, maintaining a list of eligible contractors and providing referrals to non-certified business entities. In addition, the City of Milwaukee strongly encourages subrecipients to purchase from local (i.e. City of Milwaukee-based) vendors/contractors.

Additionally, the City's Emerging Business Enterprise Division is funded in 2012 to continue to promote and encourage full and open competition and to increase access to working capital for minority and women-owned businesses. In addition, this division assists small and emerging Minority, Disadvantaged and Women-owned businesses with the City's certification process, improving access to City, County and other contracts.

The Emerging Business Enterprise Division also maintains an EBE business directory for subrecipients to utilize and which is accessible through the City's website.

6. ☒ NA If you intend to use HOME funds for Tenant-Based Rental Assistance, describe the local market conditions that led to the use of the HOME funds for a tenant-based rental assistance program.

PY 2012 Action Plan HOME response:

The City will not use HOME funds for Tenant-based rental assistance.

7. ☒ NA If the TBRA program will target or provide preference for a special needs group, identify that group from the Consolidated Plan as having an unmet need and show that the preference is needed to narrow the gap in benefits and services received by that population.

PY 2012 Action Plan HOME response: Not Applicable

8. ☒ NA If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:

- 1) Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
- 2) Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
- 3) State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- 4) Specify the required period of affordability, whether it is the minimum 15 years or longer.
- 5) Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
- 6) State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

PY 2012 Action Plan HOME response: Not Applicable

9. ☒ NA If the PJ is going to receive American Dream Down Payment Initiative (ADDI) funds, please complete the following narratives:

- a) Describe the planned use of the ADDI funds.
- b) Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
- c) Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

PY 2012 Action Plan HOME response: Not Applicable

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS

**Please also refer to the HOPWA Table in the Needs.xls workbook.*

**If not using the CPMP Tool: Complete and submit Table 1B.*

**If using the CPMP Tool: Complete and submit Needs Table/HOPWA.*

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year. Identify the method for selecting project sponsors (including providing full access to grassroots, faith-based and other community organizations).

PY 2012 Action Plan HOPWA response:

Background: The City of Milwaukee initially became an entitlement community in 1998 because of the increase of HIV/AIDS in the four-County Metro Milwaukee Area which comprises Milwaukee, Waukesha, Ozaukee and Washington counties. Since that time, the City has initiated cooperative planning efforts among service providers in the four-County area to reach consensus on the current needs of the target population, existing community resources, gaps in the current service delivery system and funding priorities.

As required by HUD, the City will allocate funds in the HOPWA entitlement area for the target population which is any person diagnosed with HIV/AIDS whose income is at or below 80 percent of the County Median Income of the County in which they reside.

Application Process: CDGA conducted an annual Request for Proposal (RFP) process which was advertised in local newspapers covering the four County Milwaukee Metropolitan area. In addition, mailings were conducted and the RFP proposal was placed on the City's website. Proposals were reviewed and scored based on a set of scoring criteria. Recommendations of CDGA were voted on by the Community and Economic Development Committee, the official oversight body for the allocation and use of Federal funds. The actions of the Committee were approved by the full Milwaukee Common Council and ratified by the Mayor. HOPWA contracts will be awarded to Richard's Place (located in Waukesha) and the AIDS Resource Center of Wisconsin for Program Year 2012.

Richard's Place is located in Waukesha, Wisconsin. The contact person is Ms. Corrie Fulwiler. Richard's Place, founded in 1996, facilitates independence, dignity and well-being through a complement of safe, affordable, appropriate housing and day-to-day support services provided to homeless persons (or persons at risk of becoming homeless) affected with HIV/AIDS and the affected persons in their lives. The target population served by Richard's Place includes single adults as well as individuals with children. Clients will receive a combination of case management services, short-term rent assistance, security deposit and utility assistance. In addition, Richard's Place will provide case management and community education with special emphasis on those who may be former substance abusers. Strict regimens of daily living will be utilized to assist in controlling the illness with drugs and other therapies currently available. Transitional and long-term housing will be made available with a special emphasis on persons with the most fragile health whom often require hospice care. Some individuals will transition to independent living or other assisted living facilities. Emphasis will be on avoiding hospital or nursing home residency prematurely because of a lack of in-home assisted care. In-home care solutions will be utilized through collaboration with other health care providers and services. Richard's Place is the only residential facility in Waukesha County for persons living with HIV/AIDS. It is also the only organization located in Waukesha County dedicated to providing HIV/AIDS supportive services, case management, community education and prevention.

AIDS Resource Center of Milwaukee (ARCW) – The contact person is Mr. Tyrone Baldwin. Established in 1985, ARCW is a non-profit statewide social service agency with a singular mission to confront and defeat the AIDS epidemic in Wisconsin. ARCW provides HIV prevention programs, comprehensive health, social services and housing services for people with AIDS/HIV, HIV clinical research and HIV advocacy. The service area for this HOPWA grant is the Milwaukee Metropolitan area serving the counties of Milwaukee, Washington, Ozaukee, and Waukesha. ARCW offers a broad range of services to meet an individual's needs, including: emergency shelter, residential housing, supportive housing, rent assistance and housing counseling services.

2. Specify the one-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

PY 2012 Action Plan HOPWA response:

CONSOLIDATED PLAN STRATEGIC GOAL: Stabilize the housing situation of people with HIV/AIDS and assist them in transitioning to or maintaining permanent housing and improving their quality of life.

2012 Annual Action Plan - Implementation Strategy:

- 1) Provide persons by or living with HIV disease stable and affordable housing while they maintain complex drug regimens to live healthy, safe lives; and to prevent the spread of HIV disease among people who are homeless, near homeless or engaging in HIV high-risk behaviors to obtain housing or life support.
- 2) Provide outreach, intake, assessment, counseling, advocacy, emergency shelter, short-term tenant-based rent assistance and supportive short or long-term housing opportunities to assist people with HIV/AIDS.
- 3) Seek additional funding to expand housing options for people with HIV and AIDS, enabling HOPWA funds to be targeted to the lowest income clients in the four-County MSA who face the most difficult challenges in obtaining safe, stable and affordable housing.
- 4) Provide short term rent and utility assistance, transitional housing assistance, long-term housing, housing counseling, supportive housing, housing services, supportive services, housing information services, and permanent placement services to 40% of HIV/AIDS infected households presumed to be alive per year.
- 5) Integrate supportive services with housing assistance to stabilize the housing situation of people with HIV/AIDS and assist them in transitioning to or maintaining permanent housing.

Housing Options to be utilized

A. Permanent Housing

There are 12 permanent housing options for people with HIV in the four county area including:

- 6 at Garden View Apartments
- 4 at Richards Place
- 2 at Elena's Place

Other permanent housing options for people with HIV will include:

- Short term rent and utility assistance to individuals to maintain permanent housing
- Housing vouchers in projected based and tenant based settings to provide permanent housing
- Shelter Plus Care 32 Units (currently no funding is provided for supportive services connected with providing intensive case management for the 32 units)

B. Transitional Housing

For individuals there are units of project-based supportive transitional based housing available, consisting of:

- 26 SRO's at Wisconsin House
- 4 SRO's at Richards Place
- 2 SRO's at Elena's Place
- HaRTSS- (Harm Reduction Through Stable Shelter) for the HOPWA Competitive funded 3-year program; 75 units available in the South East Wisconsin Area.
- SCHIP- (Stopping Cyclical Homelessness for Infected Persons) for the HOPWA competitive funded 3-year program (75 units available in the Milwaukee Metro Area)

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2012 benchmarks
Short-term Rent, Mortgage, Utility Assistance	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	285
Tenant-Based Rent Assistance	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	200
Facility Based programs	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	63
Units in facilities supported with operating costs	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	65
Supportive services in conjunction with housing activities	Provide supportive services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	740
Housing Placement Assistance: Housing Information Services	Provide housing information & housing placement services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	600

3. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

PY 2012 Action Plan HOPWA response:

a. **Increased Need for Housing.** Based on current gaps and unmet needs and a projected rise of cases, there is a need for approximately 400 units of increased housing over a 5 year period, which is based on State of Wisconsin data on the number of new HIV infections each year, the following are the priorities to address the needs of persons with HIV/AIDS:

b. **Increased Need for Supportive Services.** As people with HIV live longer, the need for supportive services connected to housing is growing. Integrated supportive services in HOPWA assisted housing programs are vital to residents transitioning to or maintaining permanent housing.

c. Housing is Becoming More Expensive. Rent and utility costs continue to climb. According to the National Low Income Housing Coalition, in Milwaukee County an extremely low income individual (example, an SSI/SSI Supplement recipient receiving \$758 per month) can afford a monthly rent of no more than \$205, while the Fair Market Rent for a one bedroom unit in Milwaukee is \$702. According to Milwaukee-based We Energies, winter natural gas prices are expected to climb at least 10% and electricity prices 3.5% (*Source: Milwaukee Journal/Sentinel, 2003*). Legal Action of Wisconsin reports that, according to the 2000 Census, more than 78% of low income households (income less than 200% of FPL) were spending more than 50% of their income on housing-related costs, while the recommendation by HUD states that no more than 30% of household income should be applied to housing costs (*Source: Pawasarat & Quinn, 2007*).

4. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

PY 2012 Action Plan HOPWA response:

ARCW and Richard's Place regularly receive input in the development, implementation and evaluation of its housing programs from clients. Annual client needs assessment surveys, annual client satisfaction surveys and periodic focus groups of housing clients are conducted. ARCW will continue to consult with its clients on its housing programs through regularly meetings with client groups and surveys of people in the program.

ARCW program development and evaluation methods include client satisfaction surveys, focus groups, client interviews, staff interviews, and review of client records. ARCW also interviews and surveys collaborative partners for the implementation of HOPWA-funded programs to garner their feedback on program operations. ARCW now has a Community Advisory Board that will assist ARCW in determining how to best address unmet needs and to provide other recommendations on needs of clients with housing challenges.

In addition, service providers funded by HOPWA participate in numerous planning processes including: the Continuum of Care process throughout Metropolitan Milwaukee, Shelter Plus Care, the Statewide AIDS Planning Group, the Waukesha County Housing Action Coalition (that includes client members and low income advocates from several different agencies), the Waukesha Housing Authority Annual Planning Process and the Waukesha County Community Block Grant Consolidated Plan, both of which include public consultation through annual public hearings.

5. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.

PY 2012 Action Plan HOPWA response:

Housing is of primary importance for all HIV-positive people. When housing is inadequate, surviving day-to-day takes precedence over managing HIV. Housing provides the necessary foundation for the provision of other components needed to maintain an HIV-positive person's health and well being, such as regular access to medical care, a nutritious diet, sufficient sleep and drug therapy compliance. Stable housing will also decrease the incidence of HIV risk behaviors such as trading sex for shelter, which could further transmit HIV. Other barriers to housing experienced by individuals with HIV disease are many:

Limited Income: HIV-positive individuals may be unable to work due to their disease. At the same time, costs for medical care and special diet strain available income.

Negative Behavior: Many clients have a history of negative behavior that disqualifies them from accessing housing. Even criminal convictions over 10 years ago can disqualify them from housing programs.

Drug Abuse: Many people with HIV are also diagnosed with drug use and other substance abuse, that may also include criminal activity and makes maintaining housing even more difficult.

Mental Illness: Many people with HIV are also diagnosed with a chronic mental illness that can make maintaining housing more difficult.

High Cost of Housing: As housing costs rise it becomes even more difficult for people with HIV – 90% of who live in poverty – to afford decent and safe housing.

Credit History: Due to the financial demands of HIV infection, many people with HIV have negative credit histories making it difficult to rent a home

Rent History: A combination of factors can lead to negative rent histories making it difficult for people with HIV to secure or re-secure housing.

High Utility Bills: Wisconsin's extreme weather conditions in summer and winter result in very high utility bills that increase housing costs for people with HIV, a vast majority of whom live in poverty.

Lack of Mid and Low Income Housing Units: Changes in national and local housing policies has significantly reduced the number of affordable mid and low income housing units available for low income people with HIV.

Prejudice: Personal prejudice, fear and discrimination, including by prospective landlords, still play into the lives of HIV-positive individuals who are often shunned by their family and community and are left to find their own housing.

Unstable housing creates stress to an already impaired immune system, deprives a person of needed rest, impairs regular nourishment, causes difficulty with storage of prescription medication and management of a complicated medical regimen, impairs adequate personal hygiene and causes undue exposure to temperature extremes. The delivery of quality health care, treatments and social services depends on maintaining stable housing. The risk of an HIV-positive person partnering-up for housing increases with inadequate housing, which yields the possibility of new HIV infections occurring.

6. If applicable, for housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).

Not applicable at this time.

7. Standards and Procedures to Monitor Compliance with HOPWA Regulations

With a focus on ensuring compliance with program requirements, The City will require compliance with the HOPWA regulations by all project sponsors. In addition, the Consolidated Plan includes all certifications relevant to the HOPWA program.

CDGA will include program requirements in all contractual agreements, sponsor orientation sessions, provide technical assistance, one-on-one and in small groups, often on site and at the beginning of the program year as well as when programs are underway. CDGA defines clear expectations regarding performance standards and policies and procedures to follow. Involved are new subrecipients, new staff of existing subrecipients, existing subrecipients experiencing problems and existing subrecipients undertaking new activities. CDGA will also fund provision of technical assistance to funded subrecipients to include management, financial operations and board and staff development.

CDGA will continue to monitor and evaluate activities to be carried out in furtherance of the Consolidated Plan and in meeting goals and objectives set forth in the Annual Action Plan. CDGA monitoring staff will continue to utilize a very detailed monitoring process which includes extensive reporting of grantee activity. As a condition of payment, which is on a reimbursable basis, agencies will be required to submit monthly financial and programmatic reports. CDGA monitoring staff will review these reports to determine that submitted costs are eligible and that the funded activity is being performed to a satisfactory level. In addition, CDGA monitoring staff will maintain extensive contact with funded agencies and provide technical assistance to groups where needed. Agencies needing additional technical assistance will be referred to the CDBG-funded technical assistance providers for additional and ongoing assistance to help improve agency efficiency and accountability.

Informal and formal monitoring visits will be conducted to ensure compliance with program requirements. Risk assessments and in-house desk audits will be performed annually of all funded agencies.

The City Comptroller's office, the fiscal arm of the Community Development Grants Administration, will conduct annual financial audits of all funded groups and monitor the timeliness of expenditures.

8. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

PY 2012 Action Plan HOPWA response:

a. ARCW will provide comprehensive integrated housing services to low-income persons with HIV disease in Milwaukee by utilizing HOPWA funding to leverage housing assistance through Federal HOPWA, State of Wisconsin ESG, and State of Wisconsin HCRI grants. This additional funding significantly expands housing options for people with HIV and AIDS, enabling HOPWA funds to be targeted to the lowest income clients in Milwaukee who face the most difficult challenges in obtaining safe, stable and affordable housing. In addition, ARCW uses unrestricted donor dollars to cover the cost of program expenses that are not grant allowable.

ARCW partners with UMOS, New Concepts, 16th Street Clinic, Children's Hospital of Wisconsin and Elena's House to provide a centralized program for housing counseling, assessment and financial assistance for persons living with HIV/AIDS. This collaboration includes a subcontract with Elena's House for the operation of AIDS-dedicated housing facilities. Often ARCW is authorized by the client to contact and collaborate with other area providers, such as Richard's Place, Hope Street, Salvation Army, Guest House and others.

ARCW is also an active participant in Continuum of Care throughout WI including the Milwaukee Metro area and Dane County COC. ARCW adheres to the National Minority AIDS Council's Continuum of Collaboration by collaborating in a variety of ways with over 250 agencies in Wisconsin for the delivery of HIV prevention, care and treatment services.

b. Richard's Place provides its residential facilities through collaboration with the Waukesha Housing Authority (WHA), which owns the buildings. The WHA secured the majority of funding for Richard's Place through a HUD SHP grant and a HUD Permanent Housing grant. The WHA also provides Section 8 Mainstream Rent Assistance Vouchers to HIV/AIDS clients receiving case management from Richard's Place. Funds from Waukesha County United Way, Waukesha County CDBG, Emergency Shelter Grant funds as well as Foundation Grants are used in conjunction with the HOPWA dollars received by Richard's Place. Richard's Place is an active participant with the State of Wisconsin Continuum of Care Planning Group, the Waukesha County Housing Action Coalition and the United Way Executives' Committee. Richard's Place also operates with the help of volunteers to call on a regular basis.

OTHER NARRATIVE

Include any Action Plan information that was not covered by a narrative in any other section.

Section 108 Loan Guarantee

Jurisdiction may use the Section 108 Projects Worksheet in the Projects.xls file of the CPMP Tool to provide this information. However, a brief summary should be included in the narratives section on what activities associated with the Section 108 Project will take place during the years covered by the Consolidated Plan Strategic Plan.

Response: During the five year Consolidated Plan period, the City may elect to utilize Section 108 funds. However, at this time, there are no projects identified.

Reprogramming Funds: Depending upon the availability of funds, additional activities may be funded through a Reprogramming cycle. The reprogramming funds, if available, will be spent on similar activities as identified in the 2010-2014 Consolidated Plan and subsequent Annual Action Plans.

Community Housing Development Organizations (CHDOs): As required by HUD, the City will meet the 15% HOME requirement of housing activities being performed by CHDOs.

CHDO Operating Funds: Agencies certified as CHDO's and funded during Year 2012 will receive a reserve of CHDO operating funds. These funds will be used for operating costs associated with the delivery of HOME-funded housing production and rehab activities.

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