

**CITY OF MILWAUKEE,
WISCONSIN**

YEAR 2015

“DRAFT”

**CONSOLIDATED ANNUAL
PERFORMANCE
AND
EVALUATION REPORT
(CAPER)**

Submitted to the local HUD Milwaukee Office

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Funds provided by the U.S. Department of Housing & Urban Development

GENERAL
GRANTEE: City of Milwaukee, Wisconsin
CON PLAN PERIOD: 2015 to 2019

Introduction

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 the following three (3) National Objectives of the U.S. Department of Housing and Urban Development (HUD):

- **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 recipient of these funds, the City of Milwaukee is required to submit to HUD each year, a final *Consolidated Annual Performance and Evaluation Report (CAPER)* which provides detailed information to the local public, HUD and members of Congress on activities undertaken with these entitlement funds. It is also used to track the grantee's performance in meeting the goals established in the **2015-2019 Five-Year Consolidated Plan** and subsequent *Annual Action Plans*. Most activities conducted in 2015 were 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).

In 2014, the City of Milwaukee submitted the *2015-2019 Five-Year Consolidated Plan* as required by the U.S. Department of Housing and Urban Development. The Consolidated Plan details broad strategies to address community development within the scope of the HUD National Objectives.

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 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.

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

In 2015, approximately **\$11.3** million in Community Development Block Grant (CDBG) and HOME entitlement dollars was allocated for direct housing and housing-related activities, including owner-occupied housing rehabilitation, acquire/rehab/sell, vacant and blighted homes, new home construction, rental rehabilitation, lead abatement and other categories. This resulted in the completion of direct housing and/or rehab activities. Other housing-related activities resulted in the following: homebuyer counseling programs assisted *first-time* low-income homebuyers in closing home mortgage loans, property units received graffiti abatement, landlords received training on effective property management and various types of tenant assistance, including tenant training, were provided to community residents.

In 2015, CDBG funds were allocated to anti-crime community development and quality of life related activities including: community organizing and crime prevention, employment services, youth programming, health services, safe havens, driver's license recovery, infant mortality initiatives and community prosecution activities.

The 2015 accomplishments related to anti-crime activities involved residents in: resident meetings and neighborhood improvement efforts such as cleanups, establishing new block clubs, and identifying hot spots, (drug houses or nuisance properties) which were referred to the appropriate authorities for action through the Community Prosecution program. In addition, thousands of youth benefited from a variety of youth employment, educational and recreation initiatives. These varied organizing efforts correlate with the five-year strategy of the Consolidated Plan of increasing resident participation to improve the overall quality of life for residents.

CDBG-funded **Job Training and Placement** and **Job Placement** activities assisted low income persons in obtaining employment and the **Special Economic Development** initiatives led to the creation of new jobs. The Milwaukee Economic Development Corporation Revolving Loan fund continued servicing existing loans for continued job creation.

In 2015, CDBG and ESG funding was allocated for mandated and essential services such as homeless shelters and domestic violence prevention programs. Funds were also allocated to city-wide services including: fair housing, graffiti abatement and landlord/tenant programs. In addition, community-based organizations received technical assistance to help strengthen their administrative capabilities and promote efficient services to the residents they serve. Enforcement services were provided to clients to resolve housing and lending discrimination complaints.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Table 1 - Accomplishments – Program Year

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2015 Goals (# units)	FY 2015 Actual (# 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	25	46
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 #affordable rental units complete & code compliant		
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	#affordable units complete & code compliant	100	103
Housing Accessibility Program	Construct handicapped ramps and other accessibility modifications	Decent Housing	Affordability	#units constructed & persons with increased accessibility	25	2
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	100	86

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator (# units)	FY 2015 Goals (#units)	FY 2015 Actual (#units)
Housing-Targeted Code Enforcement	Increase targeted code enforcement to decrease decline in target areas	Suitable living environment	Sustainability	# residential structures inspected for code compliance	5,175	11,675
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	900	1,427
Employment Services	Provide Job Placement/Job Training & Placement services for low income persons	Suitable living environment	Expand economic opportunity	# low income persons trained & placed into jobs	150	354
Youth Services	Increase employment, education, recreation, mentoring, tutoring, safe havens for youth	Suitable living environment	Sustainability	# persons with increased access to services	12,200	18,825
Community Organizing/Neighborhood Planning/Crime Prevention	Facilitate resident/stakeholder involvement in community improvement efforts; crime prevention initiatives	Suitable living environment	Sustainability	# residents & stakeholders engaged in community improvement efforts	3,000	5,615
Community Prosecution Program	Abate neighborhood nuisances; property nuisances & drug houses	Suitable living environment	Sustainability	# properties/ nuisances abated/ resolved	250	832
Driver's License Recovery	Assist low income persons with driver's license recovery & other supportive services	Suitable living environment	Sustainability	# persons obtaining a valid driver's license	100	516
Homebuyer Counseling	Provide homebuyer counseling & other services for 1 st time homebuyers	Suitable living environment	Sustainability	# persons with increased access to services	650	1,127

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2015 Benchmarks (#units)	FY 2015 Actual (#units)
Translation Services	Provide translation services to residents of the target areas	Suitable living environment	Sustainability	# persons with increased access to services	200	388
Special Economic Development	Provide direct financial and other technical assistance to businesses for job creation, job retention and business expansion	Suitable living environment	Expand Economic Opportunity	# jobs created	40	38
Teacher in Library Program	Provide library services for youth to improve academic and reading skills	Suitable living environment	Sustainability	# persons with increased access to services	1,000	1,318
Urban Agriculture/ HOME Gr/OWN Program	Re-purpose foreclosed properties & vacant lots into community gardens and neighborhood pocket parks	Suitable living environment	Sustainability	# persons with increased access to services	500	820
Emergency & Transitional Shelter; Permanent Housing & Supportive Services	Provide emergency shelter & transitional & permanent housing & supportive services to promote housing stability & independence	Suitable living environment	Sustainability	# low income, homeless persons achieving housing stability, safety & independence	6,000	7,972

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The Community Development Grants Administration continued to promote policies and employed strategies with the goal of increasing jobs and household income. To this end, the City approached planning and program development efforts in a comprehensive manner. The City also continued to investigate programs and supported 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 in 2015 were 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.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME	HOPWA	ESG
White	905	85	0	0
Black or African American	2,639	87	0	0
Asian	278	6	0	0
American Indian or American Native	27	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0	0
Total	3,849	178	0	0
Hispanic	329	74	0	0
Not Hispanic	3,520	104	0	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

As the data shows, the overwhelmingly majority of persons served were Black, followed by White, Asian, Hispanic and American Indian or American Native. U.S. census data shows that the poverty rate among Milwaukee's Black population far exceeds any other race category. As such the City of Milwaukee has consistently targeted resources to the most impoverished populations.

CR-15 - Resources and Investments

Identify the resources made available

Source of Funds	Resources Made Available
CDBG	\$14,810,440
HOME	\$4,379,227
HOPWA	\$586,842
ESG	\$1,335,846

Narrative

Many activities identified in the Consolidated and 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 were also be used for proposed activities.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Narrative Description
City of Milwaukee	64	Local jurisdiction boundaries
NRSA AREA #1	26	Central City-North Side- at least 70% of total population is low/moderate income
NRSA AREA #2	10	Central City-South Side at least 70% of total population is low/moderate income

Narrative

Geographic Distribution: The geographic distribution for these entitlement funds, with the exception of HOPWA funds, is the Neighborhood Revitalization Strategy Areas (NRSAs). Services were also 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.

There continues to be racial and ethnic concentrations both within the City of Milwaukee and in the Milwaukee Metropolitan Statistical Area(MMSA). According to the *U.S. Census, 2010*, 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).

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Leveraging Resources- The City of Milwaukee is committed to leveraging funding resources from other types of public and private sources for community development projects funded through CDGA. The projects receiving Emergency Shelter Grant (ESG) funds utilized CDBG funds to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds were used in conjunction with shelter related activities.

The housing rehabilitation projects leveraged funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. State of Wisconsin Low Income Housing Tax Credits directly provided a needed subsidy in low-income rental projects by selling the credits to investors. HOME funds were sometimes combined with CDBG funds and/or private funds. Economic development funds have complimented projects from the Department of Justice, which directly impacts community security and safety issues.

CR-20 - Affordable Housing

Evaluation of the jurisdiction's progress in providing affordable housing.

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	FY 2015 Goals (# units)	FY 2015 Actual (# 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	25	46
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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	#affordable units complete & code compliant	100	103
Housing Accessibility Program	Construct handicapped ramps and other accessibility modifications	Decent Housing	Affordability	#units constructed & persons with increased accessibility	25	2
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	100	86

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator (# units)	FY 2015 Goals (#units)	FY 2015 Actual (#units)
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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	900	1,427
Homebuyer Counseling	Provide homebuyer counseling & other services for 1 st time homebuyers	Suitable living environment	Sustainability	# persons with increased access to services	650	1,127

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City has experienced over the past several years, a decrease in funding allocations. Despite this, the City has consistently met its' annual and 5-year Consolidated Plan housing goals, particularly in the area of housing rehabilitation.

Discuss how these outcomes will impact future annual action plans.

The City will continue to implement its' housing strategy which focuses on the preservation and creation of affordable owner-occupied and rental housing units. However, the production and rehab of housing units will undoubtedly be impacted federal funding allocations. Nonetheless, the City will continue to seek additional resources and leverage to compliment its' housing production strategy.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Outreach to people who are homeless or who are at risk of homeless is conducted via the Milwaukee Continuum of Care's **Coordinated Entry** system operated by 211/IMPACT. Coordinated Entry was established in September 2013 after two years of intensive planning by a CoC work group. The system is a call-based system that receives calls from people seeking assistance and assesses their needs using a Vulnerability Index (VI). The VI assesses current homeless status, income, health, mental health, substance abuse and other factors critical to establishing priority for shelter. The overall goal of Coordinated Entry is to assure that those most in need are prioritized for services.

Coordinated Entry is widely publicized in the Milwaukee community via 211 cards and posters at emergency shelters, police substations, meal sites, day shelter, nonprofit entities, hospital emergency departments, and behavioral health providers. Coordinated Entry information is also posted on the websites of IMPACT, United Way and the Continuum of Care. All materials are in Spanish and English. Evidence that the CoC has been successfully in getting the word out about the availability of homeless assistance is evidenced by the fact that Coordinated Entry received 10,849 calls in 2014; of this number, 871 callers were placed in shelters while others were connected to 211's network of 5,500+ prevention services. (As of this writing, 2015 year-end data is not available.)

Outreach specifically to people who are unsheltered has been significantly improved in 2015 by the establishment of an **outreach collaborative** organized by the Milwaukee County Housing Division and including Outreach Community Health Centers, Community Advocates, Milwaukee Police Department, Coordinated Entry, Milwaukee Homeless Veterans Initiative, City of West Allis, Medical College of Wisconsin, Milwaukee County Behavioral Health Division, Pathfinders and several faith-based groups. The Collaborative uses Google Maps to 'pin' locations across the county and contacts are entered into HMIS (Homeless Management Information System).

Outreach workers provide triage by doing assessments on the street. A partnership with the Milwaukee Public Library has resulted in the provision of private rooms to allow outreach workers to meet with unsheltered homeless to assess vulnerability, use motivational interviewing techniques to engage them in the consideration of housing and services and complete paperwork to establish homelessness and qualify for housing services. The collaborative partners with the Milwaukee Police Department's Homeless Outreach Team (HOT Team) to coordinate outreach to all parts of the City of Milwaukee. The City of West Allis and its Mobile Integrated Health Initiative is also a partner. The Collaborative also works with Milwaukee County Parks to insure access to all of Milwaukee County. This is the first time that all outreach efforts have come together to coordinate schedules and triage to ensure that the most vulnerable, unsheltered homeless are connected to services.

Addressing the emergency shelter and transitional housing needs of homeless persons

Note: As of this writing, 2015 data is not available. In 2014, the Milwaukee Continuum of Care provided **emergency shelter services** to 2,792 homeless people including 1,771 adults and 1,019 children. (Note: This data does not include persons served by the Milwaukee Rescue Mission.) Of the total number of homeless adults (1,771), 1,369 (77%) were single adults and 402 (23%) were adults with children. Nearly half of these adults (46%) had no income when they entered emergency shelter. It is important to note that not all homeless people who seek emergency shelter are able to be placed in one of Milwaukee's emergency shelters. Since the establishment of Coordinated Entry, callers to 211 are prioritized based on a Vulnerability Index, a brief assessment instrument that looks at level of homelessness, mental health, substance abuse, physical health problems and other factors in order to prioritize need and place the most in need into shelter. Families who are not referred to shelter are connected to prevention services with the goal of helping them avoid an episode of homelessness and regain housing stability. Emergency shelters were called upon to respond to significant needs evidenced by the homeless population (adults and children) including mental illness (25%), alcohol abuse (10%), drug abuse (11%) and physical disabilities (20%). Emergency shelters addressed these needs through on-site case management services aimed primarily at addressing each individual's unique needs and barriers to obtaining and maintaining permanent housing. Most shelter users (59%) stayed less than 30 days; 20% stayed 31 to 60 days, 17% stayed 61 to 180 days. The average length of stay for leavers was 116 days. **Transitional housing services** were provided to 1,324 homeless people in 2014. This included 819 adults (62%) and 504 children (38%). Of the total number of adults (819), 564 (69%) were single adults and 255 (31%) were adults with children. Thirty-nine percent (39%) of transitional housing consumers had no income at entry.

The transitional housing population presented needs very similar to the emergency shelter population. This is not surprising since the bulk of transitional housing consumers are referred by emergency shelters. Among transitional housing consumers, 31% had problems related to mental illness, 16% alcohol abuse, 16% drug abuse, and 19% physical disability. Transitional housing programs work to connect participants to employment, education and supportive services that will enable them to transition to permanent housing within a two-year timeframe. The average length of stay for transitional housing leavers was 279 days (9.3 months). Of transitional housing participants who exited and who stayed more than 90 days, 71% went to permanent housing destinations

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Length of time homeless: The prioritization of those most vulnerable by the Coordinated Entry system has resulted in people with more serious needs being admitted to shelter. Despite this increased acuity in the sheltered population, Milwaukee has achieved a slight decrease in the average length of time homeless (LOTH) between 2014 and 2015. The average LOTH for emergency shelter and safe haven participants decreased from 50.8 days in FY 2014 to 50.3 days in FY 2015. The average length of time homeless for emergency shelter, safe haven, and transitional housing participants showed a greater decline from 64.3 days (2014) to 62.3 days (2015).

The CoC is working to reduce the length of time homeless by significantly increasing the inventory of Rapid Re-Housing (RRH) beds for families (148 beds in 2015 with an additional 196 beds in 2016)) which will enable families to leave shelter more quickly and/or to avoid shelter altogether to enter RRH. The Housing First Initiative, a collaborative of the City of Milwaukee and Milwaukee County, focuses on quickly identifying and engaging people who are homeless and unsheltered to place them in permanent housing, thus further reducing the length of time homeless for the single population.

Access to affordable housing: In 2014, 724 or 72.5% of the people who exited the CoC homeless services system after a stay of 90 days or more went to a permanent destination. Of this total, 489 or 67.5% went to their own apartment/rental with no ongoing subsidy. This is an important indicator of the extent to which CoC services are successful in helping people find housing which they is affordable and which they can sustain without ongoing subsidy.

Despite the relatively high percentage of system exiters who obtain permanent housing, this is an area of major challenge for the CoC since there is a critical shortage of affordable housing units in the Milwaukee area. There have been several successful efforts to establish new permanent supportive housing but these units are subsidized, typically by ongoing rent assistance combined with cash benefits via SSI or SSDI. Unsubsidized affordable rental units are in short supply and this is a major challenge for the system.

Returns to homelessness: The Milwaukee Continuum of Care has a two-year rate of return (RoR) of 20.1% overall (including all program types). The RoR was calculated looking at returns to homelessness for persons exiting programs two years previous. Rates of return vary somewhat among program types: The rate for street outreach is 27.7%, emergency shelter 20.1%, transitional housing 19.6%, safe haven 17.8%, and permanent housing 18.9%.

Another indicator of returns to homelessness is the proportion of homeless individuals and families who came into the system for the first time. In 2014, 5,574 persons entered the system (all program types). Of this number 66.1% were first time homeless. This means that the remainder, 33.9%, had previously used CoC services.

The strategies put in place to address length of time homeless will address the rate of return. These include increased Rapid Re-Housing capability for families and the Housing First Initiative for single individuals. In addition, the Shelter and Transitional Housing Task Force continues to work with the Milwaukee County Behavioral Health Division to improve access to crisis mental health services and facilitate enrollment of eligible people into the Comprehensive Community Services (CCS) program. This is expected to have a significant effect on the cycling of some individuals with serious mental illness in and out of the homeless services system.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Discharge planning: The Milwaukee Continuum of Care has invested substantial efforts into improving discharge planning from major institutions with the goal of preventing discharges to homelessness. Most successful has been Milwaukee County's establishment of a dedicated staff position to intervene in the discharge process of people with special needs who are being discharged from the Milwaukee County House of Correction, Milwaukee County Behavioral Health Division and local hospitals. This staff person works with available system and private resources to transition vulnerable individuals to safe and permanent housing situations. This hands-on approach has been very successful in preventing discharges to homelessness, especially for people with mental illness. Also key to the discharge issue is the role played by Coordinated Entry as an increasing number of institutions access this resource to connect with services to prevent homelessness. Discharges from institutions are monitored via APRs generated by HMIS. At this point in time, each of these institutions have discharge protocols that are intended to prevent discharges to homelessness either as a result of state or federal statute (mental health facilities, hospitals and foster care) or policy (corrections).

Collaboration with other services: The Milwaukee Continuum of Care works with a host of other organizations and institutions to prevent and reduce homelessness. In terms of **housing**, the City of Milwaukee and the City of West Allis Public Housing Authorities both admitted a significant percentage of people homeless at entry between 10/1/14 and 3/31/15 (22% and 40% respectively). In addition, the CoC has been at the center of the development of the Housing First which will house a total of 97 chronically homeless single adults in 2016. Access to **health** services has been a major initiative of the CoC, focusing on ensuring that all homeless people are enrolled in Medicaid/Affordable Care Act. Toward this end, the CoC partnered with the Milwaukee Enrollment Network which trained a network of navigators and Certified Application Counselors, eight of whom were CoC member agencies including IMPACT, Angel of Hope Clinic, AIDS Resource Center, Cathedral Center, Guest House and Salvation Army.

Relative to **social services**, including behavioral health services, the CoC, through the Shelter and Transitional Housing Task Force, has worked in partnership with the Milwaukee County Behavioral Health Division to address barriers to service delivery for homeless people with mental illness and substance use disorders. This work is expected to result in increased numbers of homeless people being enrolled in CCS which will provide ongoing case management and support services.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

In 2015, the City of Milwaukee Housing Authority undertook activities to increase the availability of decent, safe, and affordable housing; maximized the number of affordable units available to the PHA within its current resources; promoted self-sufficiency and asset development of families and individuals; conducted activities to affirmatively further fair housing; increased awareness and targeted PHA resources among families of races and ethnicities with disproportionate needs and to families with disabilities; and targeted available assistance to the elderly and families at or below 30% and 50% of AMI.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority will continue to support the Resident Advisory Board, which is the organization that represents the residents of the entire Housing Authority of the City of Milwaukee (HACM) and includes representatives from HACM's housing developments and the Rent Assistance Program. The Housing Authority meets with the Resident Advisory Board (RAB) on a monthly basis. The RAB assists the Housing Authority with the development and implementation of policies and plans, including the Annual Plan. In addition to the Resident Advisory Board, each of the Housing Authority's developments has a Resident Council that meets on a monthly basis to discuss policies and procedures, programs and activities that affect their housing development.

Actions taken to provide assistance to troubled PHAs

Not applicable – The Housing Authority of the City of Milwaukee is not designated as “troubled”.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City of Milwaukee funds 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.

City of Milwaukee – Equal Rights Commission

The City of Milwaukee ERC was established by 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 goals are to maintain the City's oversight, investigative and enforcement capabilities over discriminatory practices not addressed and protected by federal and state laws.

City Subcontracts with Fair Housing Programs

The ***Metropolitan Milwaukee Fair Housing Council (MMFHC)*** received CDBG funds in 2015 to affirmatively work toward integrated housing patterns by providing: fair housing/fair lending presentations, technical assistance relative to fair housing/fair lending and inclusive communities issues, information relative to buying, renting and selling homes, counseling and investigation services to receive and resolve fair housing/fair lending complaints, and a coordinated community-wide response to the problem of predatory lending.

The ***Legal Aid Society of Milwaukee(LASM)***, Inc., received CDBG funds in 2015 and represented vulnerable inner city residents who have been victims of predatory lending practices. Through its' A-LINE Project, the economic viability of clients has been increased and, in turn, the city neighborhoods in which clients live. In 2015, the Legal Aid Society of Milwaukee (LASM) predatory lending project continued to be highly effective in reducing the number of foreclosures and combating predatory lending in the City of Milwaukee. Through LASM's representation of vulnerable inner city residents facing foreclosure and those who were victims of predatory lending practices, there were successes in increasing the economic viability of clients and as a result, the city neighborhoods in which clients live. In 2015, LASM continued to work hard to combat predatory lending practices and assist homeowners in foreclosure.

The City has recently enacted an ordinance which allows the City to use their TIF authority to subsidize affordable housing. The ordinance allows the City to hold onto property taxes from a new TIF development in a defined area for one additional year, and dedicate it to other affordable housing projects. The City of Milwaukee is the State's first municipality to enact this ordinance using the State's enabling legislation.

The City also continues to provide funding and staff to the City of Milwaukee Housing Trust Fund. The Housing Trust Fund has been able to address some of the city's housing needs through gap financing and other means for the last several years. Increasing homeownership, increasing the supply of quality rental housing opportunities and providing housing opportunities for the homeless are three of the trust fund's goals.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City facilitated 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 utilized CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City continued 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. Various City departments 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 apprenticeship program, community cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

The City of Milwaukee engaged in the following initiatives in 2015:

- Supported the efforts of the Metropolitan Milwaukee Fair Housing Council & the Legal Aid Society.
- Supported changes in the Move to Opportunity Program to open the program to residents other than occupants of public housing and HUD-funded projects.
- Expanded the jurisdiction of the program to all "non-impacted" census tracts in the metropolitan area and required recipients to maintain residence in "non-impacted" areas for the length of the subsidy.
- Continued the efforts of the Rent Assistance Program. Solicited new property owners in non-traditional areas; counseled tenants on housing choice and housing opportunities; and, continued outreach to property owner organizations.
- Continued to review the Comptroller's monitoring of local lending activities as authorized by the Socially Responsible Investments Ordinance.
- Continued the Summer Youth Internship Program for Milwaukee's low income unemployed youth.
- Funded job training and placement programs to improve job seekers' skills to employer needs; funded job placement programs that provided transportation to jobs in outlying communities.

- Funded the *Driver's License Employability & Restoration Project* which enabled residents to obtain their driver's license and seek employment in outlying areas.
- Helped to improve coordination between economic development agencies and social service providers to target social service and other resources to residents.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

I. Estimate of number of housing units containing lead-based paint

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 is estimated at approximately 194,881 housing units pre-1978 in the City of Milwaukee.

The Milwaukee Health Department (MHD) Childhood Lead Poisoning Prevention Program (CLPPP) continued efforts to prioritize the approximately 83,794 housing units as representing the epicenter of the childhood lead poisoning prevention problem in Milwaukee, with 31,486 listed as owner-occupied. The program's most recent data (2014 data analysis), shows 8.6% of children tested in Milwaukee for lead exposure were identified as lead poisoned per the 2014 CDC lowered the level of concern of 5mcg/dL. While great strides have been made in reducing the prevalence rate, the current scope of the problem is greater than the State of Wisconsin's rate of 4.5%, in near proportion when the level of concern was 10mcg/dL.

II. Priority Program Goals/Objectives

- 1) To eradicate childhood lead poisoning.
- 2) To produce lead safe housing units in the City of Milwaukee with a focus in high risk target areas.
- 3) To diversify and increase funding to make homes lead-safe before a child is poisoned.
- 4) To increase lead testing of children covered by Medicaid.

III. Strategies to evaluate and reduce lead-based paint hazards and effects

In response to this problem, 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).

The City of Milwaukee Health Department Childhood Lead Poisoning Prevention Program (MHD CLPPP) addresses the problem of housing units containing lead-based paint hazards in three distinct ways: (1) investigations and abatement of housing units where lead poisoned children are identified; (2) risk assessments and lead abatement in high risk housing units before a child is poisoned through the Primary Prevention Grant Program and; (3) assuring lead safe housing rehabilitation and priority window treatments in federally assisted housing.

A listing of homes abated and or made lead-safe is maintained by the Health Department. The number of units that are now in the registry are 17,498 (5/1997-12/2015), of which **86** were CDBG funded in

2015 with the Lead Based Paint Prevention and Abatement Program. The MHD CLPPP continued to facilitate implementation and oversight of lead elimination in the City of Milwaukee, and actively participated on the State of Wisconsin's Lead Elimination Strategic Planning Oversight and Implementation Committee.

Key Accomplishments in 2015 include:

- The City of Milwaukee Lead Program submitted completed the first 14 months of a \$3.9 million dollar, 36 month HUD grant to continue to work in high risk areas to abate homes of lead hazards.
- The MHD continued to work with the State of Wisconsin on the lead poisoning application link to the Wisconsin Immunization Registry (WIR). Data from STELLAR will be transferred and uploaded to the WIR weekly. Individuals that are in WIR will be able to click on a link to see the lead information, and if approved, will have access to the information. This information will include the date, when, and where the child was lead tested. The MHD CLPPP has agreed to participate in the pilot-testing when the model is completed.
- MHD CLPPP actively participated on a statewide committee to develop the lead module for the Wisconsin Electronic Disease Surveillance System (WEDSS).

Other Actions undertaken in 2015 to evaluate and reduce lead-based paint hazards:

Screening (blood lead testing): In 2015, MHD CLPPP continued to enter lead level results into a database for collaboration with the State of Wisconsin. Providers, including daycare and Headstart locations, forward lead level results to MHD for data entry into the Statewide system. Laboratory Analysis: The MHD CLPPP Chemistry Laboratory continued to analyze blood lead, dust lead, soil and paint chip samples for all properties receiving MHD CLPPP intervention.

Surveillance: The lead poisoning prevalence rate for 2014 is 8.6% a decrease from the 10.3% in 2013. The current rate reported is based on the 2014 CDC lowered the level of concern of 5mcg/dL, not the 10mcg/dL as reported in previous years.

Care Coordination: Comprehensive home visit services were provided to children 385 newly identified as cases with elevated blood lead levels of 10mcg/dL. Capacity did not allow for comprehensive home visit services to be provided to the additional approximately 600 newly identified cases with elevated blood lead levels of 5mcg/dL. MHD Public Health Nurses provided medical management for 134 children that were identified as a new elevated poisoning in 2015. Additionally, MHD sent approximately 3,200 letters to parents/guardians as educational outreach that their child has been identified to have lead poisoning and provided recommendations for medical follow-up and identification of possible sources of exposure.

Target Area: The Target Area for the City's Primary Prevention Program has been 102,112 pre-1978 housing units compared with the overall City of Milwaukee's 194,881 pre-1978 units. Of the 102,112 units, the City of Milwaukee Health Department continued to focus on the highest risk 83,794 homes that were built pre-1950. Lead-safe units funded: A total of 86 units were completed in a lead safe manner using CDBG funds.

Lead Poisoning Investigations/Enforcement: 110 investigations were conducted by Lead Risk Inspectors to identify lead hazards that required remediation. Health/Housing Partnerships: The Milwaukee Health Department continued to identify multiple opportunities for health-housing partnerships to eradicate childhood lead poisoning in the City of Milwaukee; Department of Neighborhood Services (DNS) Building Code Compliance Program, the Dept. of City Development (DCD) in-rem (tax foreclosure), SDC and Layton Boulevard West Neighborhood as examples and provided monitoring for lead safe work practices and lead clearances for 141 housing units.

Prevention of Disabilities in Children: An increase in housing foreclosures has increased the instability in the rental market resulting in chronically lead poisoned children becoming more vulnerable to hazardous conditions. In response, the program is working with community partners to identify and provide outreach to owners of multi-family units for program participation. Additionally, the Milwaukee Health Department's Childhood Lead Poisoning Prevention Program continued to support the Milwaukee Public Schools (MPS) and Headstart Programs by providing blood lead testing, attending Health Fairs and working with IEP staff to provide blood lead results for learning interventions.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

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. In addition, in 2015, the City:

- Provided workforce-based training, education and mentoring to increase participants' workforce skills in industry-related certifications or licenses(such as lead abatement, OSHA, home construction and rehabilitation).
- Increased partnerships with other entities to offer supportive services to workers to promote job stability and retention, such as: job training, apprenticeships, education.
- Supported programs that provide skilled trades and high-tech training and those with an apprenticeship component such as Youth Build and Milwaukee Builds which offer housing apprenticeships along with education and supportive services.
- Assisted small businesses and microenterprises with technical assistance and access to capital through business lending and revolving loan programs.
- Supported transitional jobs programs for released inmates and offenders diverted from incarceration.
- Supported the *Driver's License and Employability Program* to assist low income residents in restoring driver's license privileges and to assist in employment opportunities.
- Expanded affordable homeownership for residents; increased quality affordable rental housing.

- Supported 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, lifeskills, employment and transportation.
- Promoted and funded programs that respond to the social issues facing youth such as: education, unemployment, teen pregnancy, truancy, crime and violence.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Institutional Structure to Carry Out the Plan: 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 contiguous NRSA's, 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 neighborhood residents and other stakeholders. The City utilized NRSAs in 2015 as a tool for community reinvestment in response to the community's distress. In addition to the NRSA structure, there are several other components that were utilized to carry out the activities that benefit stakeholders 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 2015 funded activities were under the direct control and funded by the Community Development Grants Administration. As was stated previously, these activities were primarily funded by Community Development Block Grant, HOME, HOPWA and Emergency Shelter grant funds. Funded activities were implemented by the responsible organization and monitored by the CDGA.

Structure 2: Activities carried out by City Departments using a variety of funding sources.

These activities required collaboration of City Departments for successful implementation. A variety of funding sources were utilized depending on the type of project. Coordination of these activities required responsiveness to the funding source and occurred between the City Departments involved in the project.

Structure 3: Activities carried out by City Departments in cooperation with non-city organizations.

Some activities required a City Department to collaborate with a non-City organization for planning and/or implementation. This structure required very careful and deliberate efforts at coordination of activities. This structure also required 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 continued 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, and health services delivered in the City of Milwaukee were 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 services delivered by City Departments. The organizations that carried out these services had to do so in a manner that satisfied their funding source. The City made every effort to be involved with non-city organizations, including other non-profit enterprises and for profit businesses and continued to work on collaborative efforts with other organizations and communicated the goals and policies of the City.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Milwaukee is committed to the continued coordination of all community development initiatives. In 2015, the City continued to facilitate partnerships between City Departments and community-based organizations, State and County government, other jurisdictions, 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 included the following City departments: Mayor's Office, Dept. of City Development, 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. In addition, the City:

- Placed a high priority on Interdepartmental coordination including collaboration between the Dept. of Neighborhood Services, the Dept. of City Development, the City Attorney's Office, the Health Dept. and the Milwaukee Police Department to reduce the negative impacts of nuisance/blighted properties through the Receivership Program.
- Continued collaborative neighborhood improvement programs involving City departments and community-based agencies such as Neighborhood Clean-ups, City-Wide Housing Coalition, Landlord/Tenant/Training, the Health Department Lead Abatement/Prevention Program and the Community Prosecution Program.
- Coordinated 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.

- Provided 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.
- Continued updates and improvements to CDGA’s web site to include pertinent information for community-based agencies and the public at-large.
- Continued collaborations and partnerships with non-City organizations for planning and program implementation purposes.
- Continued to advocate for additional resources for a coordinated approach to community development and planning to address poverty issues and community renewal initiatives.
- Collaborated with Milwaukee County government and other jurisdictions on Continuum of Care and other initiatives to help homeless persons and veterans in our community.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City of Milwaukee funds 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.

City of Milwaukee – Equal Rights Commission

The City of Milwaukee ERC was established by 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 goals are to maintain the City’s oversight, investigative and enforcement capabilities over discriminatory practices not addressed and protected by federal and state laws.

City Subcontracts with Fair Housing Programs

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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 included 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 routinely reviewed plans for multi-family housing and facilities where CDBG funded services are provided to ensure accessibility and participation by disabled persons.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

In accordance with its' Consolidated Plan, the City participated in activities to address identified neighborhood and community priorities. Programs for 2015 were carried out in conjunction with the following four broad strategies to effectuate progress in achieving the stated goals: Create jobs through aggressive economic development; revitalize neighborhoods by targeting resources to make a clear and measurable impact; eliminate barriers to employment by working in partnership with community stakeholders; and create and maintain affordable homeownership opportunities and affordable, quality, rental housing for community residents. To achieve these goals, CDGA conducted aggressive blight elimination efforts, supported active citizen participation in crime prevention and eliminating nuisance properties and organizing efforts to address quality of life issues. Other priorities addressed in 2015 included facilitating the economic integration and revitalization of neighborhoods, skilled job training and placement programs, new job creation initiatives and a variety of activities which fostered new homeownership and improved the condition of rental housing for residents. Activities also included integrating crime prevention into a variety of city services and capital improvements, expanding the city's aggressive efforts to combat lead hazards and City efforts to eliminate graffiti.

Performance – Based Measurement System for funded Activities : Moving to Outcomes

In conformance with the requirements of the U.S. Dept. of Housing and Urban Development, CDGA assessed the performance and progress of agencies towards addressing issues facing the areas in which they serve. In addition, as part of this ongoing assessment of performance of funded programs, all funded agencies were required to link goals and activities with outcomes and collect the data associated with proposed outcomes. Monthly performance reports were required of all funded groups. In addition, an annual report was also required explaining the data source, along with an assessment on how the selected outcomes led and/or contributed to one or more of CDGA's Long Term Outcomes. Funded agencies were also required to submit a final 2015 year-end report detailing their accomplishments and providing a self-assessment of their funded activities.

Outreach to Minority and Women-Owned Businesses

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

The City also funded the City's Emerging Business Enterprise Program which was created to assist and protect the interests of disadvantaged individuals and small business concerns in order to promote and encourage full and open competition in the City of Milwaukee. The Emerging Business Enterprise

Program also maintained an EBE business directory for subrecipients to utilize and which is accessible through the City's website. In 2015, Minority, Disadvantaged and Women-owned businesses utilized the EBE Revolving Loan Pool resulting in new job creations and new business certifications. In addition, the City has enacted legislation which has specific requirements as it relates to City contracts and participation by minority and women-owned enterprises.

Subrecipient Monitoring

After executing a contract with each funded entity, CDGA ensured compliance with all program regulations for all funding sources,(CDBG, HOME, ESG and HOPWA). CDGA included program requirements in all contractual agreements, sponsored orientation sessions, provided 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 were underway. CDGA defined clear expectations regarding performance standards and policies and procedures to follow. Involved were new subrecipients, new staff of existing subrecipients, existing subrecipients experiencing problems and existing subrecipients undertaking new activities. CDGA also funded the provision of technical assistance to funded subrecipients to include management, financial operations and board and staff development. The Community Development Grants Administration staff monitored and evaluated 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 staff monitored funded activities throughout the program year, performing formal and informal site reviews. Monitoring staff utilized a very detailed monitoring process which included extensive reporting of grantee activity. As a condition of payment, agencies were required to submit monthly financial and programmatic reports. CDGA monitoring staff reviewed these reports to determine that submitted costs were eligible and that the funded activity was performed to a satisfactory level. In addition, CDGA monitoring staff maintained extensive contact with funded agencies and provided technical assistance to groups where needed. Informal and formal monitoring visits were conducted to ensure compliance with program requirements. Risk assessments and in-house desk audits were performed annually of all funded agencies. The City Comptroller's office, the fiscal arm of the Community Development Grants Administration, conducted annual financial audits of funded groups and monitored the timeliness of expenditures.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

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, (Common Council File Number 902098). The plan outlines the procedures and processes used by the City and has since been updated and revised. The document was subsequently submitted to HUD.

Citizen input into the 2015 CAPER. In accordance with the regulations of the U.S. Department of Housing and Urban Development, the City of Milwaukee prepared a "draft" of the 2015 CAPER Report covering the City's Community Development Program from January 1, 2015 through December 31, 2015. The public comment period for review of the Report was **February 26, 2016 through March 28, 2016.** CDGA published the availability of this report on the City's website and in 5 publications on the dates listed and has submitted copies for public review at local libraries, CDGA offices and the City

Legislative Reference Bureau.

CDGA welcomes the views and input of citizens and other stakeholders as it pertains to the CAPER and other reports disseminated to the public. Any comments, letters or other correspondence received are considered and are included in reports submitted to HUD. As of March 28, 2016, there were no comments submitted on the 2015 CAPER.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The Community and Economic Development Committee, which is the official oversight body governing Federal Block Grant funds, adopted the **2015 Funding Allocation Plan**, which determined the various 2015 funding categories. Funding recommendations were subsequently approved by the Community and Economic Development Committee and ratified by the Milwaukee Common Council and Mayor.

In addition, the following priorities were adopted:

- Streamline the process, making it more “customer friendly.”
- The City will consider the goals and objectives established in the Consolidated Strategy and Five Year Plan and the City of Milwaukee's Citywide Strategic Plan in setting the priorities and goals for 2015 funding.
- The Community and Economic Development Committee and the Milwaukee Common Council will approve the strategic issues and goals corresponding to the allocation of federal grant funding.
- Establish a balanced decision-making process including neighborhood residents, business entities and other stakeholders, subrecipients, community-based organizations and elected officials.
- Maintain the creation of new and vibrant economic engines such as assistance to small businesses, special economic development projects to create jobs and Large Impact Development economic development initiatives.
- In the Job Training & Placement categories, place a high emphasis on skilled trades training.
- Continue the policy to provide technical assistance to CHDOs, allow CHDOs to use CHDO operating proceeds to increase capacity and help provide agency operating capital.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Inspections - The inspections of HOME assisted projects is an ongoing process. In 2015, the City's Department of Neighborhood Services inspected and verified tenant income levels in HOME-assisted units and documented the results, in compliance with the Federal regulations and during the applicable period of affordability.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

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.

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. However, pre-sale of homes is allowable for spec home, as long as clear and concise information is provided to the buyer.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

In 2015, a total of \$116,456.78 in program income was used for eligible affordable housing activities involving the housing rehab of 8 properties. The characteristics of the beneficiaries are as follows: All fell within the extremely low and low income categories. Pertaining to race and ethnicity, four are Black, three are White and 1 is Hispanic.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The City has recently enacted an ordinance which allows the City to use their TIF authority to subsidize affordable housing. The ordinance allows the City to hold onto property taxes from a new TIF development in a defined area for one additional year, and dedicate it to other affordable housing projects. The City of Milwaukee is the State's first municipality to enact this ordinance using the State's enabling legislation.

The City also continues to provide funding and staff to the City of Milwaukee Housing Trust Fund. The Housing Trust Fund has been able to address some of the city's housing needs through gap financing and other means for the last several years. Increasing homeownership, increasing the supply of quality rental housing opportunities and providing housing opportunities for the homeless are three of the trust fund's goals.

The City's Strong Neighborhoods Initiative is assisting the City and local nonprofits in more effectively addressing the housing foreclosure crisis and its impacts on our neighborhoods. Neighborhoods of color are disproportionately harmed by the foreclosure crisis.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	100	77
Tenant-based rental assistance	5	3
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	5	4
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	32	30

Narrative

In 2015, the City of Milwaukee received HOPWA entitlement funds for the four-County Milwaukee Metropolitan area which comprises Milwaukee, Ozaukee, Waukesha, and Washington counties. In Program Year 2015, there were no HOME funds used for HOPWA activities.

CDGA conducted an annual Request for Proposal process which was advertised in local newspapers covering the four County Metro Milwaukee area. 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 of the allocation and use of Federal funds. The actions of the Committee were ratified by the full Milwaukee Common Council and Mayor. Year 2015 HOPWA contracts were awarded to Richard's Place (located in Waukesha) and the AIDS Resource Center of Wisconsin.

Richard's Place, Inc. provides supportive living services to homeless persons with HIV/AIDS including one four-bedroom 24-hour staffed Transitional Housing Program and one four-bedroom 24-hour staffed Permanent Supportive Housing Program. Both homes serve homeless persons with serious health issues related to AIDS, including availability of end-of-life hospice care and/or the inability to maintain stable housing due to many other issues; 6 transitional living apartments for individuals and families with children with HIV/AIDS providing on-site supportive services; and 40-plus individuals/households with HIV/AIDS receiving case management services to ensure they maintain optimum health in an independent living environment. Richard's Place primarily serves indigent people. Households to be served generally have incomes less than 30% of the HUD established median income for the Milwaukee EMSA, are unemployed, under-employed or unable to sustain employment due to illness or other chronic health problems attributable to their HIV/AIDS infection. Based on previous participation, it is anticipated 90% will require assistance with at least one of the following additional special needs: mental illness, alcohol abuse, drug abuse or domestic violence.

The Aids Resource Center of Wisconsin(ARCW), ARCW remained fully compliant with the objectives outlined in the Consolidated Plan and Action Plan for the metropolitan Milwaukee area. ARCW was an active participant with the five-year Consolidated Action Plan process in the spring of 2014. With community partners focused on the HIV positive client population, ARCW was a part of the process to create a collaborative approach to meet the housing needs of HIV positive individuals.

In 2015, ARCW and its contracted partners offered a broad range of housing services to meet individual and family needs, including transitional residential housing, rent and utility assistance, and housing counseling services that includes budgeting guidance. Clients accessing services through ARCW's housing program have full access to ARCW's comprehensive roster of health and social services, including case management, transportation assistance, life-skills education, legal assistance, food pantry and nutrition counseling services, and referrals and follow-up for medical, dental, mental health, and alcohol and other drug abuse (AODA) treatment services. Clients accessing housing services are assessed to determine the services that would best meet their needs. These services may be provided by ARCW or another agency in the community. ARCW maintains close collaborative relationships with housing entities, including county-based public housing authorities, the My Home Program, Elena's House, Richard's Place (in Waukesha), Salvation Army, UMOS, Hope House, Community Advocates, and local emergency shelters. ARCW also maintains a strong working relationship with the Point of Entry staff at the local 211. ARCW is also an active participant in Continuum of Care (CoC) throughout the State, including the Milwaukee area CoC. ARCW has strengthened collaborations with the Department of Veterans Affairs to ensure qualifying veterans are connected to VA housing services to support the elimination of homelessness for veterans.

The following outlines the individual goals and objectives that guided ARCW's housing action plan:

1.1 Reduce housing costs for low-income persons living with HIV disease.

Through the short term rent and utility assistance (STRMU) program, ARCW provided rent and utility assistance to 77 unduplicated clients using CDGA HOPWA funds appropriated in 2015. This was lower than anticipated due carry-over dollars from 2014 that were used to assist some clients in early 2015. The 2015 spenddown was also delayed due to staff turn-over and vacant positions throughout the year. It is also cause for another carry-over in the 2016 year, though the staffing issues ARCW encountered in the 2015 have been resolved. Clients not meeting eligibility criteria received housing counseling, budgeting education, and referrals to other possible resources. Common reasons clients are not eligible for assistance include, but are not limited to: no written, legally binding lease in the client's name; client requires a security deposit to move in and is unable to afford it; client income too low or rent not affordable and has low likelihood of being able to sustain current housing situation. Those meeting eligibility criteria were assisted by a case manager or other housing services staff member to ensure that with financial assistance, their likelihood of maintaining their current housing would increase.

1.2. Reduce incidence of homelessness among the HIV-positive population in the metro service area.

Over 95% of households receiving rent assistance were able to maintain their housing and avoid eviction - a successful divergence from homelessness. Financial assistance that is available through HOPWA is an important resource to help clients prevent homelessness and is often used to bridge the gap of time between programs.

Twenty-two homeless individuals received facility-based housing assistance through Wisconsin House, ARCW's transitional residence. This resulted in 1,693 overnights at Wisconsin House in 2015. An average resident stay was around 110 nights. The primary causes for homelessness reported prior to entry varied from lack of income, incarceration and re-entry into society, and leaving a domestic violence or other unhealthy living situations. All Wisconsin House residents were provided with access to supportive services, which includes a comprehensive assessment of their current health, housing, legal, and case management needs, and their financial and employment situation. They were also provided education on treatment options and referrals for needed care and treatment, HIV/AIDS prevention and risk reduction education, and transportation assistance. In 2014, ARCW relocated the Wisconsin House through a partnership with Community Advocates. ARCW celebrated the first anniversary of the new location of Wisconsin House in September 2015.

1.3. Provide safe housing options.

Housing counseling is available to any client identifying a housing need. Services are client-centered and tailored to meet the clients housing needs. Housing counseling consists of identifying the housing need and problems causing the barrier to safe and affordable housing; income/expense budget planning; a review of affordable housing options; and education on budgeting and housing sustainability. It also includes referrals to other ARCW or community resources and programs that help strengthen the client's ability to retain safe and affordable housing- in some cases a referral to ongoing case management for ongoing advocacy. Two hundred and sixty clients benefited from housing counseling services in 2015 and a number of the clients accessed this service more than once. In addition to City HOPWA funds, ARCW administers two other federal HOPWA Special Projects of National Significance (SPNS) to address long-range needs of the area homeless or at-risk population and also administers State HOPWA funds outside of the metropolitan Milwaukee area.

1.4. Reduce incidence of hunger and malnutrition.

ARCW Case Managers and Housing Specialists employ a holistic approach to service provision that entails addressing client needs that can contribute to housing instability. Clients with unmet nutritional needs are connected with ARCW's food pantry and referrals to other supplemental pantries or programs in the community. Wisconsin House residents have access to three meals a day at the facility and access to ARCW's food pantry once in independent housing. In 2015, 11,178 meals were prepared by an onsite cook at Wisconsin House. Residents also had the opportunity to plan and cook some meals at Wisconsin House, which helped develop their independent living skills. Seventy-nine percent of all City HOPWA recipients were connected to ARCW's food programs.

Additionally, ARCW Case Managers and Housing Specialists are trained to assist clients through the process of enrolling for Foodshare assistance through Access and can provide additional advocacy in situations where benefits need to be reinstated.

1.5. Reduce the incidences of opportunistic infections and reduce the impact of disease on the individual and community.

ARCW Case Managers and Housing Specialists are trained HIV/AIDS Medical Case Managers. Staff go through a comprehensive training and certification program through the Wisconsin Department of Health and Human Services State HIV/AIDS Program that requires all case managers to participate in annual training hours. Case managers and specialists take a “Housing is Healthcare” approach to services recognizing that if housing is unstable the likelihood that the health is impacted increases. The ARCW Medical Clinic serves many recipients of the HOPWA programs as do other HIV providers in the community. Ninety-three percent of clients assisted with C-HOPWA funds were active in medical care in 2015. The multidisciplinary approach and having so many services under one roof that ARCW provides is convenient for ARCW’s patients and clients. A patient presenting for a routine health care appointment can have immediate access to a case manager to address housing needs. Client accessing housing services received an assessment of health, substance abuse & behavioral health needs.

Substance abuse is a common barrier to safe and affordable housing for many of housing services clients. In 2015, a number of Case Managers and Housing Specialists received the first part of the Screening, Brief Intervention, Referral to Treatment (SBIRT) assessment tool training. This assessment tool, along with the motivational change piece, is being piloted in the housing program to help identify AODA issues among ARCW clients and, if identified, to provide interventions to help reduce the effect of AODA issues on their lives. SBIRT also includes the provision of referrals to AODA services, as needed. Ongoing case management is available to clients that require additional support around access to care and/or identifying a payer source for care and treatment. All Case Managers and Housing Specialists are cross-trained in benefit advocacy and are fluent with the enrollment process for the Affordable Care Act and state benefits.

1.6. Provide access to respite care to persons needing practical and supportive services.

Elena’s House subcontracts with ARCW for City HOPWA funds. Elena’s House offers both short and long-term transitional living in a residential facility that provides housing and support services to clients with physical or mental impairments. Each resident has their own bedroom and shares a communal kitchen and bathroom. Meals, transportation, support groups and social activities are provided. In 2015, eight clients who required a higher level of care received services from Elena’s House. Referrals to Elena’s House come from medical providers, social workers and case managers from the community. Often ARCW will refer to Elena’s House if Wisconsin House cannot provide the level of care one needs to be independent.

Outcomes Assessed

The goals and objectives of the housing programs administered by ARCW in 2015 were in line with the CDGA Consolidated Plan to address homelessness and housing needs in the metropolitan Milwaukee area. As a project sponsor of CDGA HOPWA funding, ARCW is a statewide, non-profit health and social service agency whose mission is to confront and defeat the AIDS epidemic in Wisconsin. Using a holistic approach to care, ARCW provides comprehensive health and social services, including housing services, for people with HIV/AIDS, as well as undertaking education and prevention efforts to reduce new infections throughout the State. ARCW offers transitional housing through its Wisconsin House facility and also subcontracts with Elena's House for other transitional housing care. Additionally, direct financial support is available through HOPWA funds to support short-term rent and utility costs. In addition to City HOPWA funds, ARCW administers two other federally funded HUD Special Projects of National Significance (SPNS) to address long-range needs of the area homeless or at-risk population, and also administers State HOPWA funds outside of the metro Milwaukee area.

Program outcomes from the STRMU and Wisconsin House programs were tracked by ARCW utilizing *Provide Enterprise* and *Service Point* software systems and an Access database. Elena's House provides monthly reporting data for CDA-35s and project activity reports and provided input in the 2015 CAPER. Elena's House data is manually merged with the outcomes reported from ARCW's electronic systems.

Using HOPWA funds available through CDGA, ARCW was able to provide financial support through STRMU to an unduplicated total of 77 households in 2015. Many other households in the service area received housing counseling, housing advocacy, and ongoing case management. Services to the 77 households included financial assistance to clients to ease their financial burden related to rent and utility costs, to prevent evictions, to house homeless individuals who have no other housing options, and to keep clients and their families in safe housing. Assistance can last two to five months so that extremely low-income clients earning less than 80% of county median income can better meet their housing needs.

The housing assistance provided to clients in 2015 included:

- 77 unduplicated households (155 total beneficiaries) received STRMU financial assistance;
- 22 unduplicated individuals received housing, financial, and supportive services through the Wisconsin House program;
- eight unduplicated individuals received housing and supportive services through Elena's House, a subcontracted housing facility; and
- 260 unduplicated households received housing counseling, many of whom received this service multiple times throughout the year.

Without the assistance made available through HOPWA funding, many clients would be forced to deal with loss of housing, which in turn could contribute to downward spiraling of circumstances that would adversely affect not only their individual lives, but also impact families and communities. By assisting clients and their families in accessing basic needs, such as housing

and food, clients are more apt to begin to address their health care needs and to develop stronger and healthier responses to the physical and emotional demands associated with HIV infection.

The 2015 targeted goal was to serve 130 eligible households with HOPWA-based short term rent and utility assistance (STRMU). ARCW provided this service to 77 unduplicated households. The difference in goal and actual numbers in households receiving City HOPWA assistance can be attributed to a number of factors including:

- The need for security deposit assistance not funded through the City HOPWA grant. ARCW does have funding through the Ryan White program for assistance, but has a number of eligibility and usage limitations.
- The requirement that a client's name has to be on a lease can be challenging for clients that have month-to-month arrangements or other non-traditional arrangements with a landlord, or where they are rent-sharing with another individual whose name is on the lease. Many of clients have poor eviction records and are unable to get a traditional binding lease.
- Clients paying less than 30% of income towards rent are ineligible. While rent may be reasonable, other financial responsibilities could be a barrier to affording rent and STRMU would help the circumstance.
- An increase in clients with a total loss of income, making them ineligible for STRMU.
- Changes to other community and agency programs in the recent past resulted in increased access to services. This caused a temporary dip in assistance numbers while referrals were diverted. As these programs fill, clients will be redirected back to STRMU.
- In 2014, ARCW experienced carry-over dollars. Due to other unforeseen spending challenges, including staffing shortages and carry-over dollars ARCW did not begin to spend 2015 funds until end of February, putting ARCW behind on spending for the year.

Wisconsin House also experienced slightly lower than projected numbers as a result of transition the facility has experienced over the past year, such as ongoing remodeling. The Wisconsin House facility has eight rooms and 15 beds. ARCW anticipated use of all 15 beds on a more regular basis, but is learning that single occupancy of each bedroom is a client preference and more ideal for client independence and privacy. ARCW adjusted 2016 project activity numbers to reflect the standard and will continue to provide shared room options to residents at a prorated rental fee.

Coordination

ARCW is an active participant in CoC throughout Wisconsin, including the Milwaukee metro area, Dane County CoC, Eau Claire area CoC, Brown County CoC, and the Balance of State CoC. ARCW collaborates in a variety of ways with over 250 agencies in Wisconsin for the delivery of HIV prevention, care and treatment services. ARCW is also an active participant of the Point and Time Survey and Shelter Managers Monthly meeting. ARCW partners with UMOS, 16th Street Community Health Center, Milwaukee Health Services, Outreach Community Health, Children's Hospital of Wisconsin, Community Advocates, The Women's Shelter, Department of Veterans Affairs, and other entities to provide a centralized avenue for housing counseling and assistance for persons living with

HIV/AIDS. ARCW collaborates with other area housing providers such as Public Housing Authorities in all four metro counties, numerous emergency shelters, Richard's Place, Salvation Army, Cathedral Center, St. Benedict's, St. Catherine's, Guest House, Hope House, and others.

ARCW is the largest provider of HIV services in Wisconsin. Having a multidisciplinary team under one roof and using a Medical Home model ensures that clients and patients receive comprehensive and HIV specific medical, mental health, dental, substance abuse treatment, and pharmacy services. ARCW can also provide immediate access to other needed services such as legal assistance, food and nutrition counseling, financial assistance, education on HIV disease and treatment options, transportation assistance, emotional support, and employment readiness counseling, all available within the agency and offered statewide. Clients and patients who preferred to receive or are better served by supportive services from another community provider are offered referrals to those agencies and services.

Technical Assistance

ARCW has been using an ACCESS database to process and track rental payments for the STRMU program and *Provide Enterprise* for data collection and storage of all social services records, including housing assistance. Over the past year, ARCW management has been working with *Provide Enterprise* developers to create a system that will allow for all STRMU payments to be done in *Provide Enterprise*, eliminating the need for a dual system of documentation. In the fall of 2014, ARCW began test runs, addressing the system issues and began to develop policies around the new process. Having everything in *Provide Enterprise* will allow ARCW better access to reporting mechanisms, higher quality data, and better accuracy. As evidence of better accuracy with new systems, ARCW was able to identify a reporting error during 2015. The result is identification of an additional client served through the STRMU program in the 2015 whom was not reported on the CDA-35 or project activity report. The error was corrected on the CAPER. ARCW has been moving toward eliminating the ACCESS database, but the timeline to implement was hurried by an aging ACCESS database and system errors. *Service Point* continues to be used for both STRMU and Wisconsin House programs. At this time ARCW is not seeking any technical assistance but is seeking guidance about the necessity and requirements of using Service Point for STRMU recipient's data collection.

**NEWSPAPER NOTIFICATION
FOR 2015 CAPER**

CITY OF MILWAUKEE - COMMUNITY DEVELOPMENT PROGRAM

PUBLIC NOTICE OF AVAILABILITY OF YEAR 2015 CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT

In accordance with regulations of the U.S. Department of Housing and Urban Development (HUD), the City of Milwaukee has prepared and will submit to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) covering the City's Community Development Program from *January 1, 2015 through December 31, 2015*. This report is to be used by HUD in reviewing program performance as well as considering the City's program for continued funding.

The comment period for review of this report is from **Feb. 26, 2016 through March 28, 2016**. At your request, your comments will be forwarded to HUD, as required by Federal regulations. Copies of the Performance Report are available for public inspection at the Community Development Grants Administration Office, Room 606, City Hall, 200 East Wells Street, Milwaukee, WI. 53202, during regular office hours from 8:00 A.M. to 4:45 P.M. Monday through Friday. In addition, copies of this report will be on file with the Legislative Reference Bureau in Room B-1, City Hall and the following Milwaukee Public Libraries: Main Library, 814 W. Wisconsin Ave., Capitol, 3969 N. 74th St., Center St., 2727 W. Fond du Lac Ave., Zablocki, 3501 W. Oklahoma Ave., Forest Home, 1432 W. Forest Home Ave.

The report can also be accessed at www.city.Milwaukee.gov/CommunityDevelopment310.htm.

