

# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

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

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

As a Participating Jurisdiction (PJ) and entitlement community, the City of Milwaukee-Community Development Grants Administration (CDGA), receives annual funding allocations from the Federal government to fund activities to address these National Objectives. As a recipient of these funds, the City of Milwaukee is required to submit to HUD every five years, a Consolidated Plan and Strategy that defines the direction the City will take in utilizing these Federal funds to address the national objectives in a manner that will produce the greatest measurable impact on our community.

For the most part the Consolidated Plan is focused on how to best spend Federal HUD dollars. There is little discussion on the need for quality schools, government expenditures for human services or on the role of personal responsibility for life decisions, which impact economic viability. While those are all key issues, they are not within the scope of the Consolidated Plan for the City of Milwaukee's use of Federal funds. While the Consolidated Plan does not directly address these issues as strictly defined, many of the programs funded by the Community Development Grants Administration, (CDGA) have an impact on these concerns and more importantly, bring value to Milwaukee's diverse neighborhoods. The City of Milwaukee, Community Development Grants Administration will continue to strive to address the needs of Milwaukee's residents, while promoting programs and activities that will provide the greatest benefit for our community.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these

programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding. The strategies and recommendations outlined in the document attempt to balance the needs and priorities of our community and as identified in the data analysis, with the availability of funds.

## 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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

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

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

The City's ***Economic and Community Development Strategy*** compliments its Anti-Poverty strategy by emphasizing the interrelationships and the need for the expansion of opportunities in the areas of education, employment, economic development and housing. In terms of targeting resources, Milwaukee continues its commitment to cluster developments and large impact developments. In this vein, there is a growing sense that public and private sector funding should be focused more on tangible outcomes leading to neighborhood revitalization and the creation of jobs, income and wealth. This model of comprehensive planning is embraced by the residents of the target areas as the emphasis is focused on housing improvement, job creation and income enhancement.

### Housing Strategy

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

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

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

Additionally, the City places an emphasis on addressing the needs of the mentally ill and veterans, youth issues such as dropout rates, recreation, educational programs and employment and overall unemployment issues. Housing and supportive services for persons with Aids and other disabilities are another priority for the City of Milwaukee as well as continuing to monitor the impact of the Wisconsin Works (W-2) programs for Milwaukee's residents.

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

### **Additional Strategies**

Other priorities include expanding efforts to assist public housing and Section 8 residents move to private market unsubsidized housing, provide better training, advocacy and mediation services for landlords and tenants and increase the number of rent-assisted housing units and their geographic distribution throughout the metropolitan area and Milwaukee County. The City's objectives to address

these issues include placing households in either Section 8 or public housing units as turnover occurs and substantially rehabilitate rental units through the Rent Rehabilitation program.

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

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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

In 2021, 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, landlords received training on effective property management and various types of tenant assistance, including tenant training, were provided to community residents.

In 2021, 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 2021 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 2021, CDBG and ESG funding were 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.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Lead Agency: The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee (CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. CDGA annually solicits and evaluates applications from all interested parties through an open and competitive Request For Proposal (RFP) process. The funding categories for the RFP process receive input from the community at large and are finalized by the CED Committee and Mayor. Recommendations for annual funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

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

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan (FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially, the FAP is the basis for the Request for Proposals process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited. Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission. Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons (defined as those with incomes of 80% or less of Milwaukee's median income). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas (NRSAs), of which at least 70% of all residents are considered low income.

### **Citys Notification Requirement Regarding Draft Plan Availability**

A notification will be advertised in a local newspaper of general circulation to inform the public that a draft Consolidated Plan, or draft Annual Action Plan is available to review and subject to public

comment. The notification will describe the contents and purpose of the particular plan. The notice will also be posted on the City’s website ([www.milwaukee.gov/cdga](http://www.milwaukee.gov/cdga)).

The public notice will state that copies of the particular Plan will be available for review on the City’s website, and the offices of CDGA. Physical copies will also be available upon request. The City will make the Plan(s) public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the Plan. In preparation of the final Consolidated Plan, or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No written comments were submitted.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

N/A

**7. Summary**

It should be noted that CDGA strives for increased citizen input and comments in connection with federally funded activities. The City has consistently prepared “drafts” of the Annual Funding Allocation Plan, the Consolidated Annual Performance and Evaluation Plan (CAPER) and previous Consolidated Plans which cover the City’s Community Development Program. Additionally the Community Development Grants Administration held at least one public hearings to obtain citizen input on the Year 2022 Funding Allocation Plan.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator	MILWAUKEE	Community Development Grants Administration	
HOPWA Administrator	MILWAUKEE	Community Development Grants Administration	
HOME Administrator	MILWAUKEE	Community Development Grants Administration	
ESG Administrator	MILWAUKEE	Community Development Grants Administration	

**Table 1 – Responsible Agencies**

**Narrative (optional)**

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

**Consolidated Plan Public Contact Information**

Steven L. Mahan, Director, Community Development Grants Administration, City of Milwaukee, Wisconsin



## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

In 2020 CDGA contracted with the Urban Economic Development Association of Wisconsin (UEDA), a local nonprofit organization that specializes in technical assistance, to help develop the Consolidated Plan and ensure broader citizen participation. In partnership with the City, UEDA formed a robust team of community leaders representative of the community and economic development sector that became known as the Consolidated Plan Task Force.

UEDA's project team also consulted a number of data sources in the drafting and preparation of the Consolidated Plan, including other City departments (City Development, Health, Neighborhood Services); the Housing Authority of the City of Milwaukee (HACM), Milwaukee Continuum of Care, and local data consultants Data You Can Use. A review of recent research, plans and policy analysis was also conducted by UEDA, which is detailed in the Appendix.

Community input included the use of a public website (ConPlanMKE.org), community survey (both paper/in-person and electronic), focus groups, community meetings in key Neighborhood Strategic Planning (NSP) areas, and outreach/engagement at a number of neighborhood events in 2020. Plan sections were all formulated from broad-based participation of residents, various stakeholders, community-based service providers, faith-based institutions, businesses, schools, and neighborhood groups.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City of Milwaukee conducts numerous activities in coordination with various units of government including Milwaukee County, the State of Wisconsin and various jurisdictions in southeastern Wisconsin, such as Wauwatosa, West Allis, Cudahy, Waukesha, etc. These activities include shelter, regional transportation, workforce issues, and joint cooperation on a Regional Analysis of Impediments to Fair Housing.

The City of Milwaukee is also active in the following public-private partnerships:

City of Milwaukee / Milwaukee County Continuum of Care

City of Milwaukee Housing Trust Fund (various housing providers)

Employ Milwaukee (workforce investment board)

Fund My Future (children's savings account initiative)

Bankers Roundtable (group of area financial institutions focused on community investment)

Community Development Alliance (CDA - funders alliance that will focus on housing starting 2021)

Greater Milwaukee Committee (Scale-Up, The Commons)

Environmental sustainability through the ECO department

Lead abatement efforts (trainees learn effective lead-safe work practices while addressing lead hazard issues affecting City residents)

Local Initiatives Support Corporation (LISC) programs such as Associates in Commercial Real Estate (ACRE), Brew City Match, etc.

Milwaukee 7 (regional, cooperative economic development consortium)

Milwaukee Health Care Partnership

Milwaukee Rental Housing Resource Center (formed in 2020, eviction prevention)

MKE United Greater Downtown Action Agenda

Social Development Commission (SDC) - Milwaukee County's designated Community Action Agency (CAA)

Southeastern Wisconsin Regional Planning Commission (SEWRPC)

Take Root Milwaukee (sustainable homeownership initiative)

Various neighborhood initiatives led by community-based organizations and philanthropic community (Building Neighborhood Capacity Program, Healthy Neighborhoods, Near West Side Partners, Zilber Neighborhood Initiative)

WHEDA (state housing finance agency; responsible for Low Income Housing Tax Credits and homeownership programs)

COVID-19 Pandemic Response

The City continues to work with the MKE Civic Response Team, a philanthropic coalition that formed immediately in the aftermath of public health restrictions and shutdowns. Not only have they announced significant contributions specifically for COVID-19 related impacts through the "MKE Responds" fund, but continue to coordinate the community response to the COVID-19 pandemic, working closely with the City of Milwaukee and a diverse array of community-based stakeholders in the

following areas: 1) Early Childhood Education; 2) Economic Recovery; 3) Food Security; 4) K-12 Education; 5) Mental Health; 6) Physical Health; and 7) Shelter/Housing.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The mission of the City of Milwaukee and Milwaukee County Continuum of Care (CoC) is to organize people and resources to end homelessness in Milwaukee. The City of Milwaukee is the lead support agency to the CoC, providing staff to various committees and workgroups. The CoC is comprised of service providers, volunteer committees and networking/task force groups which have various roles and responsibilities to fulfill the mission of the CoC. The CoC has established numerous partnerships with local and regional entities with expertise in developing, operating and maintaining permanent supportive housing for homeless persons.

IMPACT serves as the Coordinating Agency for the Milwaukee Coc Coordinated Entry System. The CoC continues to work on strengthening partnerships with behavioral and physical health institutions so those being discharged are in contact with the Coordinated Entry System for connection to both permanent and emergency housing.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The Milwaukee City-County CoC makes decisions on the allocation of ESG funds, performance standards and outcomes, and policies and procedures for coordinated entry and the administration of the Homeless Management Information System (HMIS).

The State of Wisconsin Department of Administration-Division of Housing contracts with the Institute for Community Alliances (ICA), a nonprofit that functions as the HMIS Lead Agency and/or HMIS administrator in 14 states, including Wisconsin. They are responsible for the maintenance, oversight, security and information collected as part of the HMIS. Services provided to the Milwaukee CoC include assessments of current reporting needs, training for agency system users, leading the Point-In-Time process, and providing required HUD reports.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Urban Economic Development Association of WI
	<b>Agency/Group/Organization Type</b>	Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Technical Assistance
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In 2021 CDGA contracted with the Urban Economic Development Association of Wisconsin (UEDA), a local nonprofit organization that specializes in technical assistance, to help develop the Consolidated Plan and Action Plans to ensure broader citizen participation. In partnership with the City, UEDA formed a robust team of community leaders representative of the community and economic development sector that became known as the Consolidated Plan Task Force. UEDA's project team also consulted a number of data sources in the drafting and preparation of the Consolidated Plan, including other City departments (City Development, Health, Neighborhood Services); the Housing Authority of the City of Milwaukee (HACM), Milwaukee Continuum of Care, and local data consultants Data You Can Use.
2	<b>Agency/Group/Organization</b>	THE WISCONSIN WOMEN'S BUSINESS INITIATIVE CORPORATION
	<b>Agency/Group/Organization Type</b>	Small Business Financial Lending
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

3	<b>Agency/Group/Organization</b>	NORTHCOTT NEIGHBORHOOD HOUSE
	<b>Agency/Group/Organization Type</b>	Services-Employment Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Training & Job Skills
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
4	<b>Agency/Group/Organization</b>	Metropolitan Milwaukee Fair Housing Council
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Fair Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
5	<b>Agency/Group/Organization</b>	Employ Milwaukee
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
6	<b>Agency/Group/Organization</b>	Vivent Health
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
7	<b>Agency/Group/Organization</b>	COMMUNITY ADVOCATES - GR1523312302
	<b>Agency/Group/Organization Type</b>	Services-homeless Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

8	<b>Agency/Group/Organization</b>	MILWAUKEE CHRISTIAN CENTER
	<b>Agency/Group/Organization Type</b>	Housing Services-Employment Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
9	<b>Agency/Group/Organization</b>	Independence First
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
10	<b>Agency/Group/Organization</b>	SAFE AND SOUND
	<b>Agency/Group/Organization Type</b>	Crime Prevention Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Crime Prevention

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The 2022 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

Not Applicable. Input was received from numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City Of Milwaukee Community Development Grants Administration	The City of Milwaukee is the lead agency for the Continuum of Care. All planning and expected outcomes are consistent with CDGA's efforts of achieving the national objective of ending homelessness.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

**Broadband**

The Mayor's Milwaukee Recovery and Resilience Plan calls for a Broadband Feasibility Study with a funding commitment of \$100,000. The feasibility study will represent the City's compliance with Wisconsin State Law, which requires any municipality that seeks to offer broadband services to conduct a cost-benefit analysis. It will supply a review of options in providing that service directly or via a private-public partnership ,



the available technologies to provide broadband service, the estimated costs of deployment, and the sources of initial and continued funding, and scope of targeted residential and business areas within the City of Milwaukee.

The feasibility study is the first step of a project that will focus on households and businesses in Qualified Census Tracts where 25% or more of households report no Internet access as identified by the National Broadband Availability Map (NBAM).

If a project is funded to implement identified options, the following measures will be used:

- Increase in broadband adoption
- Reduction in monthly broadband cost
- Increased access to remote learning, remote work, and telemedicine
- The City of Milwaukee is working in partnership with Milwaukee Public Schools and broadband service providers as well.

### **Emergency Management**

The Community Development Grants Administration works collaboratively with the City of Milwaukee Office of Emergency Management and Communications (OEMC). The OEMC office serves a vital role as a liaison and primary point-of-contact to the County of Milwaukee, State of Wisconsin and all Federal cognizant agencies for activities related to emergency management. This includes Pandemic response, Disaster response, logistics, planning, providing oversight of the emergency 911 communications and radio systems, and directing all emergency preparedness initiatives throughout the City.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

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

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

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Minorities  Non-English Speaking - Specify other language: Spanish  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Due to COVID the meeting was held in a virtual format	Comments were verbal and general in nature, often speaking in support of certain projects and agencies.	N/A	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

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

CDGA 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 Solutions Grant (ESG) funds will utilize CDBG funds and agency private funds and donations to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds will be used in conjunction with shelter related activities.

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

Economic development funds will compliment projects from the Department of Justice, Safe Havens which directly impact community security and safety issues.

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

priorities of our community and as identified in the data analysis, with the availability of funds.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	16,161,496	0	0	16,161,496	30,000,000	This includes Affordable Housing; Code Enforcement; Public Services; Planning; Economic Development; Fair Housing; Technical Assistance; Administration of all funded programs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	6,094,677	0	0	6,094,677	10,000,000	This includes Affordable Housing: Owner-Occupied & Rental Rehab & New Construction; (Includes CHDO & CHDO Operating Funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,296,389	0	0	1,296,389	1,500,000	This Includes: Housing & supportive services for persons with HIV/AIDS to facilitate housing stability, independence and improve quality of life. For persons in 4-County Metro Milwaukee area.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,396,094	0	0	1,396,094	2,600,000	This includes: Housing and services for homeless individuals and families; victims of domestic violence and troubled youth; including assistance with obtaining appropriate supportive services, permanent housing, transitional housing, medical and mental health treatment, counseling , supervision, and other services essential for independent living.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

CDBG - The City meets the HUD requirement by requiring funded agencies provide documentation of eligible sources of matching funds.

HOME – The City of Milwaukee for many years has received a HUD waiver. However, when required to match the HOME funds, the City will utilize City-owned appraised land/real property, foregone taxes, fees, charges, Housing Trust Fund funded at \$1 million, Code Compliance Loan



Program funded at \$800,000, Strong Homes Loan Program funded at \$1.2 million, City bond financing, and other eligible affordable housing projects.

ESG – The City meets the HUD requirement by requiring that funded agencies provide documentation of eligible sources of matching funds.

HOPWA – The City meets the HUD requirement by requiring that funded agencies provide documentation of eligible sources of matching funds.

### **Other Sources**

There are a number of city programs that support goals and strategies in the Consolidated Plan that are funded with other sources not related to CDBG. For example housing initiatives such as the Compliance Loan program, TID Home Improvement Loans, STRONG Homes Loan program, Strong Neighborhoods Homebuyer Assistance and Rental Rehabilitation programs, Tenant Transition to Ownership program, and TIF for Affordable Housing Development are all funded largely through local sources.

Sources related to energy-efficiency, weatherization and environmental sustainability are also leveraged in this work. For example, the City’s Property Assessed Clean Energy (PACE) financing program, managed by the ECO department, has financed \$14.3m of energy efficiency projects and has emerged as an important source of gap financing for developers who seek to adaptively reuse old properties.

The city also works with the private sector and philanthropy to invest in and address community needs and support the goals and strategies in the Consolidated Plan. For example, the City is an active member of the Community Development Alliance, a group of funders focused on housing and community development activities in Milwaukee. Other groups include the Milwaukee Area Workforce Funding Alliance and the “MKE Responds Fund” which is a collaborative effort among Milwaukee’s community foundations and funders to support response efforts to COVID-19 related impacts.

Lastly, the as the COVID-19 pandemic continues to have rippling and longer term effects in the City’s public health situation and local economy, the availability and use of federal funds through economic relief packages such as the CARES Act, has provided critically important resources for the City to support long-term recovery.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

<p style="margin: 0in 0in 10pt;">The City of Milwaukee may choose to utilize City-owned foreclosed/tax deed properties and/or vacant lots to address the housing and community development needs as identified in the Consolidated Plan.</p>

**Discussion**

The CHDO Set-aside for FY2021 is \$920,000 at 15.1% and CHDO Operating is \$260,000 at 4.2%.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 6 – Goals Summary

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Affordable Housing: Owner- occupied & Rental Rehab
	<b>Goal Description</b>	<p><b>*Rehabilitate</b> distressed properties in the Target Area with a focus on deteriorated, boarded and vacant properties with an emphasis on foreclosures.</p> <p>At completion, the properties are code compliant and energy efficient and are marketed to income eligible residents.</p> <p><b>*Construct</b> new homes on vacant city lots (infill) for sale to low/moderate income owner-occupants.</p> <p><b>*Provide loans</b> and technical assistance to owner-occupants of one to four unit residential properties in need of repair and at very low interest . Code violations and energy conservation items are the top priorities of the program.</p>
<b>2</b>	<b>Goal Name</b>	Housing-Neighborhood Improvement Program (NIP)
	<b>Goal Description</b>	<b>Provide forgivable loans</b> to owner-occupants of one to four unit residential properties in need of critical repair. Code violations and health and safety items are the top priorities of the program.

3	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	Oversight and administration of all grant funded programs.
4	<b>Goal Name</b>	Housing Accessibility / Modifications
	<b>Goal Description</b>	These activities include: Housing accessibility improvements for income eligible persons with physical, visual and hearing disabilities. Improvements can include handicap accessible ramps, bathroom, kitchen, bedroom and living room modifications, safety enhancements and assistive devices.
5	<b>Goal Name</b>	Lead-Based Paint Prevention & Abatement
	<b>Goal Description</b>	
6	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	These activities include efforts undertaken primarily in deteriorated areas under the stress of absentee ownership or areas being renewed to address and arrest the decline in a designated blighted area.  The following code enforcement issues will be addressed: Building Code Enforcement, Neighborhood Clean-Ups, Neighborhood Improvement Program, Landlord/Tenant Compliance.
8	<b>Goal Name</b>	Employment Services
	<b>Goal Description</b>	Collaborative efforts of the City of Milwaukee to address the disproportionate underemployment of city residents. Individuals employed in the City's Transitional Jobs Program receive the skill training, certification and experience needed to connect with permanent employment. Services are provided to low-income unemployed residents and those aging out of foster care to assist in transitioning into the workforce through subsidized employment.
9	<b>Goal Name</b>	Special Economic Development/Business Assistance
	<b>Goal Description</b>	Provide technical assistance to businesses to help spur new job creation and job retention. Assistance includes: business plan development, financial accounting, loan underwriting, legal and tax consulting and contract procurement.

10	<b>Goal Name</b>	Homebuyer Counseling/ Education
	<b>Goal Description</b>	Provides homebuyer counseling and other activities to facilitate mortgage loan closings for first-time low-income homebuyers. Besides pre-purchase counseling and mortgage loan assistance, non-profit agencies provide budget counseling and assistance with credit repair. Services also include assistance to residents in obtaining home improvement/repair loans, refinancing,, post purchase, tax default and mortgage default counseling. In addition, the homebuyer counselors act as a liaison between homebuyers, lenders and real estate professionals.
11	<b>Goal Name</b>	Youth Services
	<b>Goal Description</b>	Social, educational and recreational activities and services for low-moderate income youth safe havens, school-community initiatives, truancy abatement and teen pregnancy prevention.
12	<b>Goal Name</b>	Neighborhood Strategic Planning/Comm Organization
	<b>Goal Description</b>	Programs are a coordinated, pro-active approach to neighborhood stability combining organizing efforts with public enforcement efforts (DNS, Health , Police and City Attorney) as a tool in dealing with crime, neighborhood clean ups, nuisance properties, block club formation and other neighborhood issues.
14	<b>Goal Name</b>	Housing Opportunities for Persons with Aids (HOPWA)
	<b>Goal Description</b>	Housing and Supportive services for persons with HIV/AIDS to facilitate housing stability, independence and improved quality of life.
15	<b>Goal Name</b>	Fair Housing
	<b>Goal Description</b>	
16	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	

17	<b>Goal Name</b>	Tenant Based Rental Assistance
	<b>Goal Description</b>	
18	<b>Goal Name</b>	Technical Assistance/Capacity Building
	<b>Goal Description</b>	
19	<b>Goal Name</b>	Coronavirus Preparedness
	<b>Goal Description</b>	
20	<b>Goal Name</b>	Planning
	<b>Goal Description</b>	
21	<b>Goal Name</b>	Public Service - General
	<b>Goal Description</b>	City Wide Community Organizing, Community Partners, Community Partners, Community Meal program, and Drivers License Recovery

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee.

### Projects

#	Project Name
1	NRSA Area #1
2	NRSA Area #2
3	CITYWIDE
4	Administration
5	Fair Housing
6	Accessible Rehab
7	Code Enforcement
8	Shelter/Domestic Abuse
9	Vacant/Blighted Real Estate
10	HOPWA-Vivent Health
11	HOPWA Unallocated
12	2022 City of Milwaukee WIH22F001
13	ESG22 Milwaukee
14	COVID Response Emergency Preparedness

**Table 7 - Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Housing: There is a great need for affordable units for those experiencing severe cost burden where more than 30% and 50% of their income is for housing costs. Other problems include: abandoned properties, decreasing owner occupancy, stagnant housing values, increasing costs for rent, dislocation of tenants due to eviction, quality of housing stock, lack of resources for housing maintenance and repairs. In addition, there is sometimes community opposition to affordable housing developments.

Public Services: As identified through the community input process, there is a need for the following

public services in the City of Milwaukee: Employment services, youth programs, services for homeless persons and those with mental, physical and/or developmental disabilities, elderly persons, crime prevention/neighborhood safety, neighborhood improvement initiatives, community organizing, access to affordable health care.

Economic Development: These needs include expansion of opportunity in the areas of employment, education, economic development, job creation, poverty reduction programs, technical and financial assistance to businesses for job creation.



**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	NRSA Area #1
	<b>Target Area</b>	NRSA AREA #1
	<b>Goals Supported</b>	Affordable Housing: Owner- occupied & Rental Rehab Housing-Neighborhood Improvement Program (NIP) Employment Services Special Economic Development/Business Assistance Homebuyer Counseling/ Education Youth Services Neighborhood Strategic Planning/Comm Organization
	<b>Needs Addressed</b>	Affordable Housing (owner-occupied, rental rehab) Special Economic Development - Assistance to small Provide Education and Services to Homebuyers and H Public Services - Youth Services Public Services - Employment Services Public Services - Neighborhood Strategic Planning/
	<b>Funding</b>	CDBG: \$3,930,301 HOME: \$3,527,177
	<b>Description</b>	THIS PROJECT IS A NEIGHBORHOOD REVITALIZATION STRATEGY AREA AND WILL BE INVOLVED IN THE FOLLOWING STRATEGIC ISSUES: HOUSING, ECONOMIC DEVELOPMENT, PLANNING, NEIGHBORHOOD STRATEGIC PLANNING, HEALTH SERVICES, SENIOR SERVICES, YOUTH SERVICES AND PUBLIC SERVICE GENERAL.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 7,000 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	NRSA 1 - Northside of Milwaukee
	<b>Planned Activities</b>	HOUSING, ECONOMIC DEVELOPMENT, NEIGHBORHOOD STRATEGIC PLANNING, YOUTH SERVICES AND PUBLIC SERVICE GENERAL. OTHER CITYWIDE INITIATIVES WILL ALSO BE CARRIED OUT WITHIN NRSA 1.
<b>2</b>	<b>Project Name</b>	NRSA Area #2
	<b>Target Area</b>	NRSA AREA #2

	<b>Goals Supported</b>	Affordable Housing: Owner- occupied & Rental Rehab Housing-Neighborhood Improvement Program (NIP) Employment Services Special Economic Development/Business Assistance Homebuyer Counseling/ Education Youth Services Neighborhood Strategic Planning/Comm Organization
	<b>Needs Addressed</b>	Affordable Housing (owner-occupied, rental rehab) Special Economic Development - Assistance to small Provide Education and Services to Homebuyers and H Public Services - Youth Services Public Services - Employment Services Public Services - Neighborhood Strategic Planning/
	<b>Funding</b>	CDBG: \$1,102,500 HOME: \$1,212,500
	<b>Description</b>	THIS PROJECT IS A NEIGHBORHOOD REVITALIZATION STRATEGY AREA AND WILL BE INVOLVED IN THE FOLLOWING STRATEGIC ISSUES: HOUSING, ECONOMIC DEVELOPMENT, PLANNING, NEIGHBORHOOD STRATEGIC PLANNING, HEALTH SERVICES, SENIOR SERVICES, YOUTH SERVICES AND PUBLIC SERVICE GENERAL.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 1,700 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	NRSA 2 - Southside of Milwaukee
	<b>Planned Activities</b>	HOUSING, ECONOMIC DEVELOPMENT, NEIGHBORHOOD STRATEGIC PLANNING, YOUTH SERVICES AND PUBLIC SERVICE GENERAL. OTHER CITYWIDE INITIATIVES WILL ALSO BE CARRIED OUT WITHIN NRSA 2.
<b>3</b>	<b>Project Name</b>	CITYWIDE
	<b>Target Area</b>	City of Milwaukee

	<b>Goals Supported</b>	Affordable Housing: Owner- occupied & Rental Rehab Lead-Based Paint Prevention & Abatement Code Enforcement Employment Services Special Economic Development/Business Assistance Youth Services Neighborhood Strategic Planning/Comm Organization Tenant Based Rental Assistance Planning Public Service - General
	<b>Needs Addressed</b>	Affordable Housing (owner-occupied, rental rehab) Improve Housing Quality (code enforcement, home re Abate and/or Prevent Lead-Based Hazards Special Economic Development - Assistance to small Public Services - Youth Services Public Services - Employment Services Public Services - Neighborhood Strategic Planning/ Planning / Technical Assistance & Capacity Buildin
	<b>Funding</b>	CDBG: \$4,679,600 HOME: \$949,675
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE FOLLOWING CITY-WIDE STRATEGIC ISSUES: ECONOMIC DEVELOPMENT, HOUSING, PLANNING, HEALTH SERVICES, PUBLIC SERVICES, CLEARANCE & DEMOLITION AND CDBG NON-PROFIT ORGANIZATION CAPACITY BUILDING.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 750 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	These activities will take place City Wide.
	<b>Planned Activities</b>	ECONOMIC DEVELOPMENT, HOUSING, PLANNING, HEALTH SERVICES, PUBLIC SERVICES, TENANT-BASED RENTAL ASSISTANCE, LEAD ABATEMENT & CLEARANCE, CLEARANCE & DEMOLITION AND CDBG NON-PROFIT ORGANIZATION CAPACITY BUILDING.
<b>4</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	City of Milwaukee

	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$1,890,695 HOME: \$405,325
	<b>Description</b>	ADMINISTRATION FOR ALL ENTITLEMENT PROGRAMS.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not Applicable
	<b>Location Description</b>	Not Applicable
	<b>Planned Activities</b>	ADMINISTRATION OF PROGRAMS
5	<b>Project Name</b>	Fair Housing
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Fair Housing
	<b>Needs Addressed</b>	Fair Housing
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	AMELIORATE RACIALLY SEGREGATED HOUSING PATTERNS IN METROPOLITAN MILWAUKEE.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 200 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	Activities will be carried out City Wide.
	<b>Planned Activities</b>	Fair Housing Seminars and Investigations, Legal representation and eviction support for renters.
6	<b>Project Name</b>	Accessible Rehab
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Affordable Housing: Owner- occupied & Rental Rehab Housing Accessibility / Modifications

	<b>Needs Addressed</b>	Affordable Housing (owner-occupied, rental rehab) Support Housing Accessibility & Modifications
	<b>Funding</b>	CDBG: \$42,750
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE NEED FOR HOUSING ALTERATIONS THAT IMPROVE ACCESSIBILITY FOR PERSONS WITH DISABILITIES.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 25 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	Activities will take place City Wide
	<b>Planned Activities</b>	IMPROVE ACCESSIBILITY FOR PERSONS WITH DISABILITIES BY DOING MODERATE PHYSICAL UPDATES TO THEIR HOMES INCLUDING RAMPS, GRAB BARS, INCREASE DOOR OPENING, ETC.
<b>7</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Lead-Based Paint Prevention & Abatement Code Enforcement
	<b>Needs Addressed</b>	Improve Housing Quality (code enforcement, home re Abate and/or Prevent Lead-Based Hazards
	<b>Funding</b>	CDBG: \$2,240,650
	<b>Description</b>	"THIS PROJECT WILL ADDRESS THE FOLLOWING CODE ENFORCEMENT ISSUES: BUILDING CODE ENFORCEMENT, RENTAL HOUSING PRACTICES AND NEIGHBORHOOD CLEAN UP."
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 2,000 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	Activities will take place City Wide
	<b>Planned Activities</b>	BUILDING CODE ENFORCEMENT, RENTAL HOUSING PRACTICES AND LEAD PAINT HAZARD PREVENTION

<b>8</b>	<b>Project Name</b>	Shelter/Domestic Abuse
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Public Services - Homeless Services
	<b>Funding</b>	CDBG: \$1,300,000
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE FOLLOWING STRATEGIC ISSUES. PERMANENT HOUSING AND SELF SUFFICIENCY, HOMELESS PREVENTION, RUNAWAY/HOMELESS YOUTH ABUSED AND/OR NEGLECTED CHILDREN AND DOMESTIC VIOLENCE INTERVENTION AND PREVENTION.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 4,000 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	These activities we take place City Wide.
	<b>Planned Activities</b>	PERMANENT HOUSING AND SELF SUFFICIENCY, HOMELESS PREVENTION, RUNAWAY/HOMELESS YOUTH ABUSED AND/OR NEGLECTED CHILDREN AND DOMESTIC VIOLENCE INTERVENTION AND PREVENTION.
<b>9</b>	<b>Project Name</b>	Vacant/Blighted Real Estate
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Code Enforcement
	<b>Needs Addressed</b>	Address Problem Properties (demolition, clearance
	<b>Funding</b>	:
	<b>Description</b>	"HIS PROJECT WILL ACQUIRE BLIGHTED PROPERTIES FOR REDEVELOPMENT, ENSURE MAINTENANCE AND PROPER PHYSICAL CONDITION OF CITY OWNED VACANT LOTS AND MAINTAIN PROPERTIES ACQUIRED BY THE CITY THROUGH FORECLOSURE AND OTHER AREAS."
	<b>Target Date</b>	12/31/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	No Activities planned
<b>10</b>	<b>Project Name</b>	HOPWA-Vivent Health
	<b>Target Area</b>	4-County Metro Milwaukee area
	<b>Goals Supported</b>	Housing Opportunities for Persons with Aids (HOPWA
	<b>Needs Addressed</b>	HOPWA
	<b>Funding</b>	HOPWA: \$735,000
	<b>Description</b>	THIS PROJECT WILL CREATE A COOPERATIVE PLANNING INITIATIVE AMONG SERVICE PROVIDERS WORKING WITH THE HIV/AIDS POPULATION, TO DETERMINE CURRENT NEEDS AND AREAS OF SERVICE GAPS AND FUNDING GAPS IN ORDER TO PROVIDE COORDINATED CASE MANAGEMENT SERVICES & ASSISTANCE IN OBTAINING AND PROVIDING LOW COST HOUSING.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 150 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	Activities can take place in the 4-County Metro Area
	<b>Planned Activities</b>	CASE MANAGEMENT SERVICES & ASSISTANCE IN OBTAINING AND PROVIDING LOW COST HOUSING, STRMU and TBRA.
<b>11</b>	<b>Project Name</b>	HOPWA Unallocated
	<b>Target Area</b>	4-County Metro Milwaukee area
	<b>Goals Supported</b>	Housing Opportunities for Persons with Aids (HOPWA
	<b>Needs Addressed</b>	HOPWA
	<b>Funding</b>	HOPWA: \$546,389



	<b>Description</b>	THIS PROJECT WILL CREATE A COOPERATIVE PLANNING INITIATIVE AMONG SERVICE PROVIDERS WORKING WITH THE HIV/AIDS POPULATION, TO DETERMINE CURRENT NEEDS AND AREAS OF SERVICE GAPS AND FUNDING GAPS IN ORDER TO PROVIDE COORDINATED CASE MANAGEMENT SERVICES & ASSISTANCE IN OBTAINING AND PROVIDING LOW COST HOUSING.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate up to 75 families will be assisted with these funds
	<b>Location Description</b>	Activities can take place in the 4-County Metro Area
	<b>Planned Activities</b>	Unknown at this time
12	<b>Project Name</b>	2022 City of Milwaukee WIH22F001
	<b>Target Area</b>	4-County Metro Milwaukee area
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	HOPWA: \$15,000
	<b>Description</b>	ADMINISTRATION FOR THE HOPWA PROGRAM.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
13	<b>Planned Activities</b>	Administration of program
	<b>Project Name</b>	ESG22 Milwaukee
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Public Services - Homeless Services
	<b>Funding</b>	ESG: \$1,396,094

	<b>Description</b>	"THIS PROJECT WILL PROVIDE EMERGENCY, TRANSITIONAL AND PERMANENT HOUSING; SUPPORTIVE SERVICES; CASE MANAGEMENT; HOMELESS PREVENTION; TENANT-BASED RENTAL ASSISTANCE; HOUSING RELOCATION & SERVICES; RAPID RE-HOUSING; HOUSING & SERVICES FOR HOMELESS YOUTH AND VICTIMS OF DOMESTIC VIOLENCE.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 7,000 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	These activities will take place City Wide
	<b>Planned Activities</b>	EMERGENCY AND PERMANENT HOUSING; SUPPORTIVE SERVICES; CASE MANAGEMENT; HOMELESS PREVENTION; TENANT-BASED RENTAL ASSISTANCE; HOUSING RELOCATION & SERVICES; RAPID RE-HOUSING; HOUSING & SERVICES FOR HOMELESS YOUTH AND VICTIMS OF DOMESTIC VIOLENCE.
<b>14</b>	<b>Project Name</b>	COVID Response Emergency Preparedness
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Homelessness Coronavirus Preparedness Public Service - General
	<b>Needs Addressed</b>	Address Public Health Concerns (including access t Public Services - Homeless Services
	<b>Funding</b>	CDBG: \$625,000
	<b>Description</b>	Prepare, Prevent and Respond to the Coronavirus Pandemic
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that over 150 low-moderate income families will benefit from the activities.
	<b>Location Description</b>	These activities will take place City Wide
	<b>Planned Activities</b>	TEMPORARY HOUSING FOR HOMELESS PERSONS (HOTEL RENTALS) AND PERSONAL PROTECTIVE EQUIPMENT

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee.

#### The census tracts for NRSA 1 are as follows:

11,12,13,14,15,19, 20,21,22,23,24,25,26,27,28,37,38,39,40, 41,42,43, 44,45,46, 47,48,49,50,59,60,61,62,63,64,65,66,67, 68, 69,70,79,80,81,84, 85,86, 87, 88,89, 90, 91,92,93,96,97,98,99,106, 107,122, 123,133,134,135,136,137,141, 146,147,148,149,1854,1855,1856,1857,1858,1859,1860,1861,1862, 1864.

#### The census tracts for NRSA 2 are as follows:

157,158,159,160,161,162,163,164,165,166,167,168,169,170, 171,173,174,175,176,186,187,188,1865,1866

### Geographic Distribution

Target Area	Percentage of Funds
NRSA AREA #1	29
NRSA AREA #2	10
City of Milwaukee	47
4-County Metro Milwaukee area	3

**Table 8 - Geographic Distribution**

### Rationale for the priorities for allocating investments geographically

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee. The major emphasis is on targeting resources to effectuate neighborhood revitalization by integrating housing, economic development and public services in a tightly defined geographic area through a clear and well planned development

strategy.

## **Discussion**

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 about 8% of the county's African American population lives outside the city limits, and far fewer live in the suburban population of the four-County Milwaukee Metropolitan Area.

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 minorities. 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).

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

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

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	292
Special-Needs	0
Total	292

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	100
The Production of New Units	37
Rehab of Existing Units	155
Acquisition of Existing Units	0
Total	292

**Table 10 - One Year Goals for Affordable Housing by Support Type**

### Discussion

The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the Milwaukee Builds Housing Apprenticeship Program, community

cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

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

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

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

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

The Housing Authority of the City of Milwaukee manages 3,419 public housing units.

Most of the housing units are in good to excellent condition; however, the configuration of the apartments in the round towers are challenging for the staff and its residents. The Housing Authority has most recently revitalized its’ Westlawn public housing development and is continuing to revitalize its Scattered Sites portfolio.

The Housing Authority maintains two separate wait lists for its public housing program: 1) the family wait list, and 2) the elderly/near elderly/disabled wait list.

### **Actions planned during the next year to address the needs to public housing**

Increase the availability of decent, safe, and affordable housing; maximize the number of affordable units available to the PHA within its current resources; promote self-sufficiency and asset development of families and individuals; conduct activities to affirmatively further fair housing; increase awareness and target PHA resources among families of races and ethnicities with disproportionate needs and to families with disabilities; target available assistance to the elderly and families at or below 30% and 50% of AMI.

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

The Housing Authority is governed by seven Commissioners, two of whom are public housing residents. It is their responsibility to determine Housing Authority policy and assure agency compliance with all applicable state laws and federal regulations. 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. Both the RAB and the Resident Councils also receive a small amount of HUD funding

every year to help fund resident participation activities.

HACM has also worked to improve resident leadership capacity by providing training and technical assistance to resident leaders.

HACM works closely with the City of Milwaukee to leverage funding and other resources to address public housing needs. Two specific examples of the City's partnership with the Housing Authority is the City's participation in the Choice Neighborhoods Implementation grant and the Neighborhood Stabilization Program. The Department of City Development is the Neighborhood Implementation Entity for the Choice Neighborhoods grant, and If the Housing Authority receives a Choice Neighborhoods grant, the City will provide Community Development Block Grant funds to support eligible activities in the Westlawn Transformation Plan. The Housing Authority was a subgrantee on the Neighborhood Stabilization Program (NSP) grant and is continuing to work with the Department of City Development on the implementation plan to address abandoned and foreclosed properties in the City of Milwaukee.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable. The City of Milwaukee Housing Authority is not designated as troubled.

**Discussion**



## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

From a systems perspective, the overall strategy is to strengthen Milwaukee’s homeless prevention programs and services, so the number of people entering the emergency shelter and transitional housing decreases. More focus can then be on programs such as Rapid Re-Housing and placements into stable/permanent housing. The City of Milwaukee and Milwaukee County Continuum of Care (CoC), programming, and other service providers are committing to pursuing seven critical efforts:

1. Prevent Homelessness
2. Increase Outreach
3. Assess and Adapt Emergency and Transitional Housing Capacities
4. Secure Safe Emergency Shelter
5. Transition to Permanent Housing
6. Shorten Homelessness Duration
7. Monitor Needs Specific to Covid-19

Each of these areas is described below, aligned with the four parts of this section: (1) Outreach and Assessment of Needs of people experiencing homelessness; (2) Strategies for Emergency Shelter and Transitional Housing Needs; (3) Use of Rapid Re-Housing and Permanent Housing; and (4) Homeless Prevention efforts.

Milwaukee’s Coordinated Entry (CE) system is now fully implemented for families and single women and men. CE will function as a one-call system operated by 211, accessible via phone call, text message, online, and walk-in navigation centers. It is a gateway to the full array of homeless services, including prevention, rapid re-housing, emergency shelter, and permanent supportive housing with services directed to homeless individuals and families in greatest need.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

##### **Strategy: Increase Outreach**

Outreach helps people exit to permanent housing from places not meant for human habitation (unsheltered settings). Improvements can be observed annually in the System Performance Measures report submitted to HUD.

Coordinated Entry combined with outreach ensures that CE is the first point of contact, widely publicized and utilized by all homeless serving organizations and residents of the entire city/county. CE

allows for people at risk to seamlessly access prevention services relating to basic needs, income, employment, transportation, and other assistance as soon as possible. Specific examples of CE actions are the dispatching of outreach staff to 211 callers on the street and the coordination of appropriate services for those fleeing domestic violence.

Outreach efforts and Coordinated Entry are the foundation for a strong and effective homeless services system. CE manages the prioritization of referrals to shelter and permanent housing programs funded by CoC and ESG. Linking people at imminent risk of homelessness with resources to sustain permanent housing in the community is a critical component of an early intervention system. Ensuring people who have no option other than emergency shelter are referred to the most appropriate setting is also essential. The initial focus of CE was on emergency shelters. The next and most recent point of focus was on permanent supportive housing. With these systems functional, the following focal points will be systemic diversion and homelessness prevention services, with CE being the conduit for information sharing and services referral.

Outcome: 3,600 CE callers served annually

**Street Outreach** will continue to be provided to homeless adults and youth. Outreach will engage homeless people on the street, in parks, under bridges, encampments, and abandoned buildings. Outreach workers will provide food, clothing, and personal care items as immediate assistance and connect the homeless with HIV testing, substance abuse services, benefits assistance, access to shelter, transitional housing, safe- haven, rapid re-housing, and permanent supportive housing. Collaboration with nonprofit outreach providers and law enforcement will continue.

Outcome: 1,000 homeless encounters annually

**School-based Outreach** will continue to be provided to children and families via a designated homeless outreach contact at each school that can facilitate enrollment in Milwaukee Public Schools' Homeless Education Program (HEP). Online and central office enrollment will also be offered. HEP-enrolled families will receive McKinney-Vento services, including free breakfast/lunch, before/after school programs, tutoring, fee waivers, free books/materials, ESL, school health, special education, and other services. HEP will also refer families to Coordinated Entry and other community services as needed. With the closure of schools due to the COVID-19 pandemic, additional outreach strategies will be explored to connect with families who may be facing housing insecurity.

Outcome: Reach 5,000 homeless students annually

**Estimating Future Homelessness:** Additionally, the CoC is currently developing a tool to estimate future homelessness using technical resources available through HUD. It will help provide the Milwaukee CoC with a way to monitor a handful of data sets for potential entries into the homeless system, and then

activate support in other institutions and/or systems with prevention strategies.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

There is a known lack of safe emergency spaces for the homeless. Emergency shelter and transitional housing are resources for individuals and families in greatest need who have no other housing option in the community. Our current focus is to create and access more permanent housing so individuals experiencing homelessness can be transitioned more quickly out of shelters, which allows the current number of shelter beds to serve more people.

The importance of emergency warming and cooling rooms is growing in response to more extreme weather patterns. In 2020, the Point In Time methodology was adjusted to count guests at warming rooms as sheltered rather than unsheltered, which is where they were traditionally counted.

In response to COVID-19 and with emergency funds provided by the federal and state governments, shelter capacity was expanded rapidly to accommodate social distancing requirements. This emergency effort warrants further examination as a potential long-term response to addressing homelessness.

The CoC is pursuing the following activities to improve the effectiveness of existing Emergency and Transitional Housing:

1. Enhance low barrier shelter models that serve a population of people with a high acuity of needs, the majority of whom have a mental health condition, by promoting partnership and adding service capacity that may be available through the Milwaukee County Behavioral Health Division, to support the shelter's efforts to offer a level of care needed.
2. Explore options for adding specialized employment and benefits case managers to shelters to improve shelter guests' housing options, allowing for turnover in shelter and availability of shelter beds for folks staying outside.
3. Engage landlords in working with supportive housing programs to improve inventory available for local programs.
4. Encourage tenant workshops in shelters to prepare guests for renting an apartment (with or without a housing program).
5. Secure private funding for smaller costs that are barriers to housing, like application fees.
6. Encourage housing navigator specialization in case managers attached to street outreach or emergency shelter programs.
7. Work with HOPWA grantees to ensure that individuals with HIV/AIDS have access to stable housing, which is critical to ensuring they are better able to access medical care and supportive services.
8. Continue using the "Moving On" strategy as a means to increase openings in CoC permanent supportive housing (PSH). This entails working with other mainstream housing programs (public housing, Housing Choice Voucher, etc.) to transition PSH clients to stable housing but no longer need intensive services.

Current capacity of emergency shelter and transitional housing beds can be found in MA-30 (Homeless Facilities and Services), Table 43: Facilities and Housing Targeted to Homeless Households.

Outcome: 1,400 people served as members of households; 2,800 people served as single adults annually with the number decreasing over the next five years

**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**

**Strategy: Secure Safe Shelter**

Rapid Re-Housing (RRH) is a strategy intended to reduce the reliance on emergency shelter and transitional housing and increase successful placement in permanent unsubsidized or supportive housing in the community. RRH includes case management, and rent assistance (per the HUD definition) was implemented in 2018. Before this time, case management and rent assistance have been provided as separate programs by a network of homeless services providers. It is considered a leading strategy to get individuals and families stably housed quickly, with some case management.

Outcome: 1,200 served in 2020, with the number increasing every year over the next five years; Reduction in Length of Stay.

**Strategy: Transition to Permanent Housing**

By increasing access to permanent housing, the Milwaukee CoC seeks to ease pressure on the shelter and transitional housing side of the system. The following activities will assist the CoC to help people find secure, stable housing:

1. Implement a policy to prioritize 100% of Permanent Supportive Housing (PSH) beds that become available through turnover for occupancy by people who are chronically homeless.
2. Continued project evaluation for a number of exits to permanent housing.
3. Continue to utilize current Safe Havens sites as an alternative permanent housing option to add needed capacity to the system.
4. Work with service providers to secure PSH/permanent housing for families with children, and special needs populations, particularly people with disabilities, seniors, and individuals living with HIV/AIDS.
5. Engage additional veterans service providers to collaborate with the CoC on connecting veterans to services and programs that increase housing stability as described in NA-40 and NA-45.

6. Work with the Housing Authority of City of Milwaukee (HACM) to utilize a percentage of available housing or housing vouchers to assist CoC service providers in finding stable, permanent housing for people in shelter or transitional housing.
7. Support the establishment and operation of pilot projects that are funded by hospitals and HMOs in order to increase inventory of permanent supportive housing.
8. Continue to increase RRH inventory through funding made available due to federal relief programs such as the CARES Act in 2020.

Outcome: Current capacity of PSH beds is 2,732 (also available in Table 43 in MA-30). Goal is to increase the number of PSH beds for Category 1 individuals identified as having the highest need.

Outcome: 200 persons served in Safe Havens as members of households; 400 people served as single adults annually, with the number decreasing every year over the next five years.

### **Strategy: Shorten Homelessness Duration**

Efforts towards homelessness duration reduction will focus on individuals and families that are not already chronically homeless. Our data indicates the sooner one makes the transition to permanently affordable housing and independent living, the less likely that individuals and families will repeat the experience of homelessness. Key to our goal is CoC facilitating access for homeless individuals and families to affordable housing units while supporting preventing individuals and/or families from ever becoming homeless again.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

### **Strategy: Prevent Homelessness**

A multi-pronged approach to homeless prevention takes the following actions:

1. Provide low-income housing specifically for families.
2. Provide ESG-funded homelessness prevention services, including housing relocation, stabilization, and tenant-based rental assistance.
3. Focus on low-income individuals and families who are more likely to become evicted; Extremely low-income individuals and families likely to become homeless due to severe housing cost burden; or those receiving assistance from public and private agencies that address housing, health, social, employment, education, or youth needs.

4. Advocate for and support eviction prevention efforts such as the newly formed Rental Housing Resource Center, increased access to mediation services to divert potential eviction filings; increased access to legal services; and an increase in the availability of temporary rent assistance funds.
5. Support targeted intervention efforts to achieve permanent housing placement for people leaving a system of care such as foster care, hospitals, mental health facilities, and corrections.
6. Provide secondary prevention via effective delivery of CoC/ESG-funded emergency shelter, rapid re-housing, transitional housing, safe haven, and permanent supportive housing that decreases the rate of return to homelessness.
7. Identify and address barriers to fair housing choice.
8. Incorporate homeless prevention in jurisdictions' Consolidated Plans and provide City and County CDBG support for foreclosure and eviction prevention programs operated directly by jurisdictions and community-based organizations.
9. Support for the development of a tool to estimate future homelessness, which will help provide the Milwaukee CoC with a way to monitor potential entries into the homeless system, and then activate support in other institutions and/or systems with prevention strategies.
10. Develop and implement a focused CoC-wide effort to reduce the rate of return and monitoring progress for individual providers and the system.

Outcome: Reduce the number by 5 % of individuals and families that become homeless, as seen in annual System Performance Measures.

## Discussion

**Reduction in the Rate of Return** will continue to be tracked using an HMIS-generated Rate of Return (RoR) report to identify homelessness or return to the shelter after exiting any CoC-funded housing program. The CoC will also continue to use RoR as a criterion in the annual HUD renewal project ranking. Currently (2019), CoC projects had the following Rates of Return (12-month): Street Outreach (20%), Emergency Shelter (25%), Permanent Supportive Housing (11%), Transitional Housing (8%), Safe Haven (18%), and Supportive Services Only (21.0%). The plan to reduce the Rate of Return includes:

1. Increasing income through the utilization of cash and non-cash mainstream resources including SSI/SSDI.
2. Utilize the expanded SOAR training capacity to improve the skills and services of case managers.
3. Increasing employment through collaboration with employment service providers; particularly those specialized to serve people with disabilities and mental health conditions.
4. Achieving maximum enrollment in Affordable Care Act health insurance.
5. Improving access and utilization of mental health and substance abuse services.

Outcome: Reduction in rate of return to national best practice levels or less than 55 days.

**AP-70 HOPWA Goals– 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	140
Tenant-based rental assistance	10
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	4
<b>Total</b>	<b>154</b>

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

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

### **Summary of Impediments:**

#### **Collaborative Region**

- Impediment 1: Lack of a Regional Housing Strategy or Plan
- Impediment 2: Lack of Regionally Dispersed Affordable Housing
- Impediment 3: Restrictive Local Land Use Regulations and Other Ordinances
- Impediment 4: Restrictive Zoning Regulations for Group Homes and Community Living Facilities
- Impediment 5: Prevalent “Fear of Others” among Residents, including NIMBYism<sup>1</sup>
- Impediment 6: Strong Jobs-Housing-Transit Mismatch
- Impediment 7: Lack of Fair Housing Guidance and Enforcement
- Impediment 8: Lack of Accessible Housing for Persons with Disabilities
- Impediment 9: Gap in Homeownership by Racial and Ethnic Minorities Compared to White Households
- Impediment 10: Overcrowded Housing
- Impediment 11: Extensive Use of Evictions

#### **City of Milwaukee**

- Impediment 12: Lack of Private Investment in Specific Neighborhoods
- Impediment 13: Gentrification of Some Neighborhoods Surrounding Downtown

#### **Private Sector Real Estate Market**

- Impediment 14: Racial and Ethnic Disparities in Mortgage Lending, Insurance, and Appraisal Practices
- Impediment 15: Lack of Fair Housing Knowledge

**Actions it planned 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**

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

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 extend one additional year the increments of an expiring 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.

### **City Subcontracts with Fair Housing Programs**

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

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

The **Legal Aid Society of Milwaukee**, Inc., will continue to operate its' A-LINE Project and represent

vulnerable inner city residents who have been victims of predatory lending practices. Legal Aid Society will continue to provide direct representation to victims of predatory mortgage lending practices and mortgage foreclosure rescue scams. Legal Aid will continue its efforts to challenge the unconscionable practices of auto title lenders in our community.

**Discussion:**

The Analysis of Impediments to fair housing is a document that is required every 5 years from any Participating Jurisdiction that conforms to the Block Grant Consolidated Planning process and Public Housing Agencies (PHAs). The U.S. Department of Housing and Urban Development in the Final Rule for the Affirmatively Fair Housing Marketing Plan (AFHMP) stated best practices for submission of the plan. A regional planning process approach will assist communities analyze challenges to fair housing choice and establish goals and priorities to address the fair housing barriers.

Jurisdictions and Public Housing Authorities supporting the 2020 Milwaukee County AFHMP:

- City of Milwaukee
- Housing Authority City of Milwaukee
- Milwaukee County Housing Division
- Milwaukee County Housing Division (PHA)
- City of Wauwatosa
- City of West Allis
- West Allis Public Housing Authority

## AP-85 Other Actions – 91.220(k)

### Introduction:

The City of Milwaukee has implemented a few major initiatives, the Strong Neighborhoods, 10,000 Homes, Anti-Displacement and Growing Prosperity Plans, to address issues of affordable housing, foreclosure, economic opportunities, quality of life, and neighborhood stability.

In 2014, the Mayor and the Common Council established the Strong Neighborhoods Plan as the City’s “all hands on deck” approach to vacancy and foreclosure. The Plan seeks to build on Milwaukee’s success in stabilizing the housing market, and continue the city’s recovery from the foreclosure crisis. Since 2014, the Mayor and Council have allocated over \$50 million for Strong Neighborhoods.

The plan has four strategic goals:

- PREVENT tax delinquency and tax foreclosure
- MITIGATE blight and ensure vacant properties do not deteriorate
- REVITALIZE neighborhoods through sales and rehab of tax foreclosed property
- RENEW Milwaukee neighborhoods by activating vacant space

Growing Prosperity is an Action Agenda for Economic Development in the City of Milwaukee addressing the need for actions to be taken in the city itself—by city government and by others— to capitalize on regional strategies for growth so that the city can thrive in an increasingly global economy.

Growing Prosperity outlines 10 principles and a broad vision, closely aligned with the goals of the M7 framework that will put the City of Milwaukee and its residents on a path to economic success.

This Action Agenda explores four areas of focus:

- location-based opportunities,
- human capital development,
- entrepreneurship and innovation, and
- quality of life and place

Both plans require partnerships with some of the many businesses, foundations, nonprofits, and other organizations that work in the City of Milwaukee.

### **Actions planned to address obstacles to meeting underserved needs**

The Community Development Grants Grant Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent and affordable housing and economic opportunity for all residents. This community vision

recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and access to community social services. The City will continue to encourage CDBG, HOME and other HUD-funded project recipients to include work experience opportunities in their housing rehab and new construction projects and to link their projects with other public and private human service, resident organizing and economic development initiatives. The City will utilize CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City will continue to expand collaborations with lenders, businesses, developers, other governmental entities, community stakeholders and other development resources such as WHEDA and Community Development Financial Institutions (CDFIs) to expand available resources. The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the Fresh Start housing program, community cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

### **Actions planned to foster and maintain affordable housing**

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

The City continued to promote and provide opportunities for low income citizens to access affordable housing. All of the programs listed hereafter in this section provide outcomes that are consistent with the goals articulated in the Consolidated Plan. The Plan indicated that efforts will be made to increase homeownership opportunities and to improve the condition of the City's rental housing stock with an emphasis on large family rental units

### **Actions planned to reduce lead-based paint hazards**

The Health Department will continue to work closely with other City Departments and community partners on efforts to increase awareness off the EPA Lead-Safe Rule and integrate lead-safe work practices into City housing projects. The City has utilized multiple HUD grants for focused treatment of addressing high risk window components where lead paint content and lead dust levels are extremely high, while the property owner addresses other lead hazards that may be present in the home. In addition, the Health Department provides comprehensive secondary interventions to lead poisoned children and their families and has successfully engaged in community and housing-based primary prevention to prevent lead exposure in areas disproportionately impacted by childhood lead poisoning.

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).

### **2022 Annual Action Plan - Implementation Strategy**

- Assure compliance with the HUD Lead Safe Housing Rule and EPA Renovation Repair and Painting (RRP) rule by providing information, education and training to property owners.
- Continue to produce lead safe housing units in the high risk target area of the City of Milwaukee utilizing all available funding; provide partial grant subsidies to assure the safe remediation of lead-based paint hazards for high risk window components for housing units.
- Provide investigations and case management to lead-poisoned children and their families in Milwaukee.
- Involve community organizations and members most affected by the problem in neighborhood based strategies.
- Increase the awareness and importance for lead testing of children; minimum of 3 blood lead tests before the age of 3.
- Diversify and increase funding to make homes lead-safe before a child is poisoned.

### **Actions planned to reduce the number of poverty-level families**

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.

### **2022 Actions Planned:**

- Prevent, prepare for, and responding to the Coronavirus was structurally included in all actions planned in 2022; Create livable wage jobs through aggressive economic development activities to help reduce the unemployment of Milwaukee residents; Assist with training individuals for jobs within emerging industries such as manufacturing, health care, retail/hospitality, information technology, business / financial Services, water, and green economy industries; Provide 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); Increase partnerships with other entities to offer supportive services to workers to promote job stability and retention, such as: job training, apprenticeships, education; Support 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; Promote and market the identities of neighborhood retail districts and implement existing improvement

plans; Assist small businesses and microenterprises with technical assistance and access to capital through business lending and revolving loan programs; Support transitional jobs programs for released inmates and for offenders diverted from incarceration; Support the *Driver's License and Employability Program* to assist low income residents in restoring driver's license privileges and to assist in employment opportunities; Expand affordable homeownership opportunities for residents; increase quality affordable rental housing; Support programs and initiatives which assist in removing barriers for low income persons such as walk-to-work programs, English proficiency programs and those that provide access to an array of wrap services such as: Health services, social services, education, life skills, employment and transportation; Pursue new revenue sources and improve efficiency in current programs to maintain existing service levels; Work with community partners to improve the physical appearance, social and economic vitality of Milwaukee neighborhoods and commercial districts; Promote programs that respond to the social issues facing youth such as: education, unemployment, teen pregnancy, truancy, crime and violence.

### **Actions planned to develop institutional structure**

Many funded activities are under the direct control and funded by the Community Development Grants Administration. These activities are primarily funded by CDBG, HOME, HOPWA and ESG funds. Funded activities will be implemented by the responsible organization and monitored by the CDGA.

### **Activities carried out by Non-City Organizations**

The majority of social service, public service, income transfer, transportation and health services delivered in the City of Milwaukee are administered by non-City organizations. These vital services are an essential part of the comprehensive community development effort. There is no formal institutional structure to coordinate these disparate services with those delivered by City Departments. The organizations that carry out these services must do so in a manner that will satisfy their funding source. At present, the requirements of the funding source do not necessarily compliment the policies of the City and sometimes contradict the goals and objectives of city-supported activities. The City makes every effort to be involved with non-city organizations, including other non-profit enterprises and for profit businesses, but the City cannot force changes in these services nor can the City create an institutional structure to carry out the Consolidated Plan. The City will continue to work on collaborative efforts with other organizations and continue to communicate the goals and policies of the City.

### **Institutional Structure: Annual Action Plan Priorities:**

- Prevent, prepare for, and responding to the Coronavirus was structurally included in all actions

planned in 2022.

- Place a high priority on Interdepartmental coordination including collaboration between the City Attorney's Office, the Mayor's Office, the Milwaukee Police Department, the Department of Neighborhood Services and the Department of City Development to reduce the negative impacts of nuisance/blighted and foreclosed properties through the Strong Neighborhoods Plan and the Community Prosecution Program.
- Continue collaborative neighborhood improvement programs involving City departments and community-based agencies such as the Community Prosecution Unit, Neighborhood Clean-ups, City-Wide Housing Coalition and the Health Department Lead Abatement/Prevention Program.
- Provide public access to data for the public and community-based agencies; technical assistance for community-based agencies in gathering and researching data, internet mapping and data analysis of CDGA-funded activities.
- Continue to enter into collaborations and partnerships with non-City organizations for planning and program implementation purposes.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

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

### **Discussion:**

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Milwaukee utilizes local tax levy and private foundation funds to create affordable housing opportunities. The Mayor's Strong Neighborhood Plan and Housing Trust Fund are two



examples.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City will primarily use Recapture Provisions for all its' homebuyer activity, except in cases where the Resale Provisions are required, or when the Presumption of Affordability is requested for a particular project in advance. Recapture and Resale Provisions are clearly defined in the contract between the City and all subrecipients. It is enforced with an active covenant that is secured by a mortgage at time of closing, to ensure affordability of units acquired with HOME funds.

#### **Period of Affordability**

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How to calculate the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

#### **Period of Affordability Under Resale Provisions**

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

#### **Period of Affordability Under Recapture Provisions**

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The following table outlines the required minimum affordability periods.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City will ensure that, when a homebuyer sells his/her property, during the affordability period: the property is sold to another low-income homebuyer who will use the property as their principal residence; the original homebuyer receives a fair return on investment, and the property is sold at a price that is "affordable to a reasonable range of low-income buyers." If the City only provides HOME assistance to develop the unit and HOME funds are not used to lower the purchase price

from fair market value to an affordable price, resale provisions must be used.

**Ensuring Long term Affordability:** If the housing is transferred during the period of affordability, it must be made available for purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence.

**Fair Return on Investment:** The City's resale requirements will ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and certain capital improvements).

**Presumption of Affordability:** In certain neighborhoods, housing can be presumed to provide a fair return to an original homebuyer upon sale, to be available and affordable to a reasonable range of low-income homebuyers, and to serve as the primary residence of a low-income family during the period of affordability. In such cases, the City will not impose resale restrictions because the characteristics of the neighborhood make it probable that these requirements will be met without the imposition of the restrictions. Instead, §92.254(a)(5)(i)(B) of the HOME rule states that the City may identify certain neighborhoods with housing and income conditions that will:

- 1) Provide ongoing affordable home prices;
- 2) Ensure that the sales price of a home will provide a fair return to the original homebuyer, and
- 3) Provide a pool of income-eligible homebuyers from the residents of the neighborhood.

The 2020 Annual Action Plan/Consolidated Plan does include an updated Market Analysis and the indicators in the NRSA's clearly show the continued justification for using the Presumption of Affordability in the NRSA's.

**Recapture Provisions:** The HOME recapture provisions permit the original homebuyer to sell the property to any willing buyer during the period of affordability while the City is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. Recapture Method: In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the City will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided in the form of a deferred payment 0% interest loan. The loan will be forgiven prorata over the period of affordability (i.e., generally 5 years), as long as the home remains the principal residence of the homebuyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, The City shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not Applicable

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Standard policies and procedures are have been developed to ensure proper evaluation of families and individuals for assistance under ESG. Families will initially be evaluated using a standardized evaluation tool. The evaluation tool will be used by 211 or other homeless system point of entry to conduct a cursory assessment to determine demographics, income level, housing status and the determination of which agency will best provide assistance to the family or individual. All individuals that contact 211 will have this assessment completed and will be either directed to a shelter, community case manager, or homeless prevention provider. Once a family has been referred to a shelter, within one week the shelter will assess the family for Rapid Rehousing eligibility. Eligibility will be based on the uniform assessment tool that all agencies will utilize to ensure that each applicant is assessed properly. All individuals must either be homeless, at-risk of homelessness or at imminent risk of homelessness. All individuals involved must not have any other appropriate subsequent housing options identified. Also, individuals must lack the financial resources and support networks to remain in the existing home.

Individuals must also meet ESG income guidelines.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Milwaukee Continuum of Care established Coordinated Entry in October 2013 after a two-year planning process. Coordinated Entry is sponsored by United Way of Greater Milwaukee and operated by 211 at IMPACT. An ongoing work group functions in an advisory capacity to support implementation.

Coordinated Entry covers all of Milwaukee County. It is a one-call system operated by 211, accessible via phone call, text message, and online. Coordinated Entry is advertised through high-volume sites including churches, meal programs, community centers, and libraries as well as advertised via bus signs, billboards, TV, radio, newspapers, and social media.

Trained staff uses the Coordinated Entry Assessment Tool as a priority ranking method to determine callers in greatest need for emergency shelter and to facilitate referral of other callers to community

services to support housing stability. The Assessment Tool gathers the following information: name, date of birth of all families members, English proficiency, special population (veterans, recently incarcerated, exiting transitional housing, domestic violence, disabling conditions such as substance abuse, mental illness, pregnancy, or other medical/physical disability, special accommodations required to obtain shelter, where stayed previous night, length of stay/ability to stay longer, monthly income, and consent for release of information. In addition, Coordinated Entry has access to HMIS to view callers' service history.

Persons determined to be in greatest need are warm-transferred to emergency shelter. Prevention and supportive services are arranged for those persons whose living situation can be extended pending a permanent housing placement. At this time, Coordinated Entry serves families and single women; it was expanded to single men in 2014. The goal is for Coordinated Entry to include transitional housing, safe haven, rapid re-housing, and permanent supportive housing to warm transfer options using the VI-SPDAT (Vulnerability Index – Service Prioritization Decision Assistance Tool) to better inform needs and resource matching. Coordinated Entry is a major system improvement for the Continuum of Care that will result in more efficient utilization of homeless services and better outcomes for individuals and families.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

CDGA administers the ESG funds allocated directly to the City of Milwaukee as well as ESG funded awarded to Milwaukee by the State of Wisconsin. For directly allocated ESG, CDGA solicits the recommendations formulated collaboratively by the Shelter Provider Advisory Group, which is affiliated with the Continuum of Care, and the CoC Executive Board in making its ESG recipient selections and allocations. Those recommendations are ratified by the Milwaukee Common Council and the Mayor. For ESG funds awarded to Milwaukee by the State of Wisconsin, there is a local competitive process that begins with community notification of funding availability and invitation to apply. Selected projects are included in a consolidated application prepared by CDGA as Lead Agency for the Continuum of Care. The application is submitted to the Wisconsin Division of Housing. CDGA administers contracts with recipients/sub-recipients for both ESG allocations. ESG reporting and performance evaluation is conducted by means of Performance Activity Reports/HMIS completed by each organization and submitted monthly to CDGA. ESG priorities are aligned with the CoC's 10-Year Plan, Consolidated Plan, and Housing and Service System Plan.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Continuum of Care regularly solicits input from homeless individuals and families via the semi-annual Point in Time survey. Survey results are used to prioritize needs, develop program initiatives,

and evaluate progress over time. In addition, the CoC has several members who have the lived experience of having been homeless, many are veterans who are active in one of the CoC's six veterans services organizations. Guest House, an organization operating emergency shelter, transitional housing, and permanent supportive housing, sponsors a group of former consumers called Living Proof. This group meets regularly to advise Guest House on policies and programs and to provide insight and advice to the Continuum of Care. On the community level, an increasing number of persons with lived experience in the areas of mental illness and substance abuse as well as having experienced periods of homelessness have become active in entities associated with the Continuum of Care including the Milwaukee County Mental Health Redesign Task Force, MC3, and the peer support specialist movement. Twenty peer support specialists with diverse lived experience are currently employed by Milwaukee County-operated CoC-funded Permanent Supportive Housing programs.

5. Describe performance standards for evaluating ESG.

As the Lead Agency of the Continuum of Care, CDGA has a signed MOU with each CoC/ESG program authorizing access of program documents to address program quality, expenditures, and compliance reporting. If needed, the Lead Agency can recommend participation in performance improvement including training and additional reporting. The MOU is enforced through review of each program's APR (Annual Performance Report) and data quality reviews conducted by the Continuum of Care HMIS (Homeless Management Information System) and shared with the Lead Agency. Annual performance reviews are conducted for renewal program rating and ranking. Monthly performance reports are required by CDGA of all funded groups in conformance with the new HUD Statutory Program Outcomes. The results provide a monthly performance scorecard. Funded agencies also submit semi-annual and year-end reports detailing accomplishments along with backup documentation. HUD performance goals are incorporated into all levels of compliance monitoring. The Lead Agency (CDGA) monitoring staff maintains extensive contact with funded agencies and provides technical assistance to ESG-funded groups when needed. Agencies needing additional technical assistance are referred to the Nonprofit Center of Milwaukee (NPC) which is under contract to CDGA to provide individual consultation to programs and provide a comprehensive calendar of nonprofit management training opportunities. When longer term technical assistance is required, CDGA provides ongoing guidance necessary to correct deficiencies and strengthen overall project capacity. A critical step in improving performance has been the implementation of a clear, objective performance measurement system (PMS) which allows projects to assess their progress relative to other Milwaukee projects and HUD performance goals. The PMS also allows technical assistance to be specifically targeted to deficiencies and provides documentation necessary to administer funding sanctions in response to uncorrected poor performance. HUD technical assistance is available for longer term technical assistance project which involve a level of complexity that exceeds available CDGA and Nonprofit Center capacity. The City will continue to conduct formal and informal site reviews of CDGA-funded programs as well as perform risk assessments and in-house desk audits of those programs. CDGA will receive fiscal guidance from the

City Comptroller's Office, the fiscal arm of CDGA, when reviewing those agencies' financial documents and expenditures. While at this point, CDGA's authority does not extend to this level of monitoring for all CoC grants, ESG-funded agencies have complied with monitoring by CDGA as part of its Lead Agency responsibilities. On-site monitoring, tracking of progress on performance goals, and reporting out to the Continuum of Care as a whole are major improvements for the Milwaukee CoC, instituted in 2012-13, which enable the identification of technical assistance needs and capacity-building initiatives for the future.

The City of Milwaukee use a Request For Proposal Method of soliciting project sponsors for the HOPWA Program. The City only received one applicant for the FY2022 year.

