

2010-2014

FIVE YEAR

CONSOLIDATED PLAN

AND STRATEGY

City of Milwaukee
Wisconsin

For Submission to the U.S. Department of Housing & Urban Development by the:

Community Development Grants Administration
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Funds provided by the U.S. Dept. of Housing & Urban Development

**City of Milwaukee, Wisconsin
2010-2014 Consolidated Strategy & Plan**

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Executive Summary

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

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

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

As a recipient of these funds, the City of Milwaukee is required to submit to HUD 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.

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

The new HUD statutory program goals are:

DECENT HOUSING - which includes:

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

A SUITABLE LIVING ENVIRONMENT - which includes:

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

EXPANDED ECONOMIC OPPORTUNITIES- which includes:

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

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

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

For the most part, this 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 this 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.

Resources

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, Stewart E. McKinney Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA)**. Other Federal and State funds to be used for proposed activities include Weed & Seed, the High Intensity Drug Trafficking Areas (HITDA), the Gang Reduction Initiative and the Juvenile Accountability Block Grant, among other resources.

Leveraging Funds

CDGA is committed to leveraging funding resources from other types of public and private sources for community development projects funded through CDGA. For 2010, the projects receiving Emergency Shelter Grant (ESG) funds will utilize CDBG funds to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds will be used in conjunction with shelter related activities.

The housing rehabilitation projects will leverage funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. Low Income Housing Tax Credits directly provide a needed subsidy in low-income rental projects by selling the credits to investors. Matching funding for the HOME program will include 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. For 2010, leveraged funds from the City's Weed and Seed Program will be utilized. Also, the High Intensity Drug Trafficking Areas (HIDTA) program will be used to compliment CDBG-funded activities similar to the Weed and Seed program.

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.

SUMMARY OF COMMUNITY NEEDS/STRATEGIES/GOALS FOR HOUSING AND COMMUNITY DEVELOPMENT

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. This strategy has expanded to include cluster developments such as evidenced on North Dr. Martin Luther King Jr. Drive, West North Avenue and Layton Boulevard. In this vein, there is a growing sense that public and private sector funding should be focused more on tangible outcomes leading to neighborhood revitalization and the creation of jobs, income and wealth. The City has expanded the Mainstreet Program which is a citywide program that utilizes a comprehensive approach to revitalization of commercial districts throughout the City of Milwaukee. This initiative involves collaborations from representatives of the public sector, lending institutions, community-based organizations and Milwaukee area foundations. The basic principles for the Mainstreet Program are the targeting of public and private funds in specific geographic areas to spur new business development, improve the area's physical appearance and promotion of the area as a destination point, thus creating new jobs and enhanced business opportunities.

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.

The City of Milwaukee's ***Housing Strategy*** for the next five years 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.

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

Persons with special needs as well as the disabled and homeless are an important concern for the City as they strive to bring value to neighborhoods. The *Milwaukee Continuum of Care 10 Year Homeless Prevention Plan*, 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.

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

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

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

MANAGING THE PROCESS

Consultation 91.200(b)

- 1) Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.
- 2) Describe the jurisdiction's consultations with other public and private agencies that provide health services, social and fair housing services. (91.100(a)(1)) *Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.
- 3) Describe consultations with public and private agencies that provide assisted housing, health services, and social services to determine resources available to address needs of any persons that are chronically homeless. (91.100(a)(2))
- 4) Describe consultations with local and regional institutions and other organizations (including businesses, developers, and community and faith-based organizations) (91.105(a)(2)(ii))
- 5) Describe consultations with state and local social service, health, and child service agencies in accordance with 91.100(a)(3) regarding lead based paint hazards. (92.200(b))

Managing the Process

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

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

<u>Name</u>	<u>Organization</u>
Racquel Bell	Brighter Futures
Norma Ballentine	Safe & Sound, Inc.
Trena Bond	Housing Resources
Martha Brown	City Dept. of City Development
Pat Delmenhorst	Interfaith Older Adults Program
Katherine Doyle	Legal Aid Society of Milwaukee
Brian Peters	Independence First
Bethany Sanchez	Milwaukee Metropolitan Fair Housing Council
Kelly Draves	Wiscraft Services for the Blind
Steve Fendt	Southside Organizing Committee

Michael Gapinski	Lincoln Neighborhood Redevelopment Corp/ Harris Bank
Michael Gifford	AIDS Resource Center of Wisconsin
Corrie Fulwiler	Richard's Place
Bob Harris	City-Dept. of City Development
Tanya Henry	Milwaukee Careers Cooperative
Barbara Notestein	Safe & Sound, Inc.
Robert Jackson	Boys & Girls Club
Ruth Varnado	Lincoln Park Community Center
Dave Crowley	YMCA-CDC
Nicole Crust	YMCA-CDC
Antonio Perez	Housing Authority of Milwaukee
Maria Rodriguez	Housing Authority of Milwaukee
Michael Van Alstine	Milwaukee Christian Center-NIP
Joseph Volk	Community Advocates & Shelter Task Force
Kathie Walker	North Avenue Community Dev. Corp.
Barbara Moore	Project Respect
Liz Hammer	Silver Spring Neighborhood Center
Delores Green	Lisbon Avenue Neighborhood Development
Paula Butler	Social Development Commission
Kenneth Schmidt	Hope House of Milwaukee
Stephanie Saniter	Hope House of Milwaukee
Bob Greene	Merrill Park Neighborhood Association
Barry Mimis	Northwestside CDC
Julie Borum	YMCA-Parklawn
Shalanys Ellison	Sherman Park Community Association
Milwaukee Continuum of Care	Representing 85 organizations
City of Milwaukee Health Dept.	City of Milwaukee-Dept. of Neighborhood Services
	Community Development Grants Administration

In addition, the Community Development Grants Administration sponsored approximately 20 community meetings to solicit the input of stakeholders on funding priorities. CDGA, in collaboration with Safe and Sound Community Partners, conducted door-to-door canvassing in the neighborhoods, discussing issues with stakeholders and conducting surveys on community priorities. Additionally, the City's Department of City Development facilitated numerous community meetings, focus groups and face-to-face surveys as part of the comprehensive planning process.

The goals and objectives included in this plan were formulated from broad-based participation of residents, community leaders, faith-based institutions, businesses, schools and neighborhood groups.

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

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

INSTITUTIONAL STRUCTURE

91.215 (k)

6) Provide a concise summary of the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, community and faith-based organizations, and public institutions.

7) Provide an assessment of the strengths and gaps in the delivery system.

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

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

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

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

Structure 1

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

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

Structure 2

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

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

Structure 3

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

Some activities require a City Department to collaborate with a non-City organization for planning and/or implementation. This structure requires very careful and deliberate efforts at coordination of activities. This structure also requires open and on-going communication among the organizations involved in the specific collaboration.

In structuring a collaborative effort, the City's needs, resources and goals must be carefully integrated with the needs, resources and goals of the other partners in the project. This is a complex undertaking because each of the partners in the project may be accountable to a different funding source. In spite of the complexity of coordinating various collaborative efforts, the City of Milwaukee will continue to pursue these relationships in an effort to link resources and meet the goals of providing decent housing, establishing suitable living environments and expanding economic opportunities.

Structure 4

Activities carried out by Non-City Organizations

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

Gaps in the Structure

The four institutional structures used for implementation of the Consolidated Plan have strengths and weaknesses. Structure 1 and 2 are under the control of various City Departments and therefore have very few, if any, gaps. Structure 3 relies on a cooperative effort with a non-city organization; therefore, gaps can and do occur. These gaps generally occur when the regulations or funding requirements of the non-city organization conflict with the regulations or requirements of the City Department or the City's funding source. These gaps are identified and dealt with on an individual basis. Sometimes the gaps are filled through a negotiation process between the City Department and the non-city organization at other times negotiations directly with the funding source must occur. When negotiations are successful, projects can continue. When negotiations reach an impasse, the project may have to be discontinued.

The greatest challenge for gap filling is with Structure 4. Many services are delivered in the City by non-city organizations, These organizations are very dependent on federal funding sources. Each federal funding source operates under their own set of regulations and laws. It is the conflicting regulations and laws at the federal level which present the greatest challenge to a consolidated planning effort at the local level. A perfect example of this type of challenge is the Consolidated Plan process itself. HUD is requiring local governments to begin a community-wide strategic planning process which is to involve all of the stakeholders in the community. This process should include Department of Labor, Health and Human Services, Department of Transportation and other federally funded organizations. However, none of the other federally funded organizations are required to participate in the consolidated planning process; nor, do they have the authority to alter their programs to address the objectives of the local Consolidated Plan. At best, gap filling at the local level is a process of collaboration and communication. Other agencies can be invited to participate in the planning process, small collaborative initiatives can occur and local officials can continue to advocate for changes in federal programs. However, in order to effectively fill this gap, changes must occur at the federal level.

Obstacles to Addressing the Need

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

area and are coordinated individually by their sponsoring organization and through an informal city-wide network of organizations, foundations, non-profits, educational institutions, businesses and governments.

Institutional Structure: 5- Year Consolidated Plan Priorities:

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

8) Describe the efforts to enhance coordination with private industry, businesses, developers and social service agencies, particularly with regard to the development of the jurisdiction's economic development strategy.

Activities to Improve Coordination: The City of Milwaukee is committed to the continued coordination of all community development initiatives. The City will continue to facilitate partnerships between City Departments, State and County government and community-based organizations, 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.

In addition, the City is currently working with members of the Milwaukee 7 economic development group which consists of government and business representatives of Waukesha, Ozaukee, Walworth, Racine, Kenosha and Washington counties. The goal of the Milwaukee 7 is to improve the economy of Southeast Wisconsin.

Citizen Participation 91.200 (b)

9) Based on the jurisdiction's current citizen participation plan, provide a summary of the citizen participation process used in the development of the consolidated plan.

10) Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s) and the dates of the 30 day citizen comment period.

11) Provide a summary of citizen comments or views received on the plan and explain any comments not accepted and reasons why these comments were not accepted.

12) Describe the criteria the jurisdiction will use for determining what changes in the jurisdictions' planned activities would constitute an amendment to the consolidated plan.

Citizen Participation Process

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.

City's Notification Requirement Regarding Draft Plan Availability

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

The City will make the Plan(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.

Performance Reports

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

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

The City will publish a notice in at least two local newspapers regarding the availability of the CAPER, which will begin the 30-day review and comment period. The notice and the draft CAPER will also be made available to the public via the City's website, City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report.

Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

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

Citizen Complaints

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

Access to Information for Limited & Non-English Speaking Persons

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

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

Citizen Participation on the 2010-2014 Consolidated Plan

As stated previously, the Community Development Grants Administration sponsored approximately 20 community meetings to solicit the input of stakeholders on funding priorities. In addition, CDGA, in collaboration with Safe and Sound Community Partners, conducted door-to-door canvassing in the neighborhoods, discussing issues with stakeholders and conducting surveys on community priorities. Additionally, the City’s Department of City Development facilitated numerous community meetings, focus groups and face-to-face surveys as part of the comprehensive planning process.

The goals and objectives included in this plan were formulated from broad-based participation of residents, community leaders, faith-based institutions, businesses, schools and neighborhood groups.

The following top priorities were identified through the community meetings and door-to-door stakeholder surveys:

RESULTS OF DOOR-TO-DOOR SURVEYS OF COMMUNITY RESIDENTS

What are your priorities for government spending in your neighborhood? (Scale of 1 to 3 with 3 being the most important)						
Category	Low	Medium	High	Don't Know	Rating Average	Response Count
Housing	11.1% (194)	30.1% (527)	58.8% (1,029)	0.0%	2.48	1,750
Economic Development	10.3% (180)	30.4% (529)	59.2% (1,032)	0.1% (1)	2.49	1,742
Public Safety	10.2% (176)	22.0% (379)	67.8% (1,171)	0.0%	2.58	1,726
Youth & Family Services	9.7% (168)	27.3% (474)	63.0% (1,096)	0.1%	2.53	1,739
Employment	10.2% (188)	15.4% (283)	74.4% (1,370)	0.0%	2.64	1,841
Community Building/Values	11.2% (191)	28.6% (489)	60.2% (1,031)	0.1% (1)	2.49	1,712

Survey Results – Community Priorities

2010 - 2014 Community Development Funding Priorities

Activity Category	N o	L o w	M e d i u m	H I G H	T O T A L
	I m p o r t a n c e	I m p o r t a n c e	I m p o r t a n c e	I m p o r t a n c e	
Housing Production (acquire blighted properties, rehab and sell to owner occupant, construct new housing on vacant lots)	11	20	77	129	237
Housing – NIP-Forgivable loans to very low income owner occupants to fix code violations	2	26	72	158	258
Housing Rental Rehab Projects- Matching grants to rental property owners for improvements to rental properties with income qualified tenants.	6	46	81	99	232
Housing – Owner Occupied -Low interest loans and grants to income qualified owner occupants for home improvements	1	16	60	194	271
Housing -- Minor Home Repair -Matching grants up to \$750 for exterior improvements for income qualified owners	4	19	67	174	264
Employment Services	9	22	39	153	223
Economic Development / Business Assistance/New Job Creation	8	24	70	131	233
Crime Prevention / Community Organizing and Planning	3	6	35	202	246
Youth Programs	6	13	87	194	300
Senior Services	4	19	56	139	218
Homebuyer Counseling	12	47	72	64	195
Other – please list (Gas, Electric -4, Green Jobs -1, Foster Care-4, Small Business-2, Prison reentry-1, Not listed -3, Recycling Education-1, Ex-Offender Housing-1, Disabled Services-2, Church Programs-1, School Safety-1, Teachers Pay-1, Health Services-1, In-Home Business Asst-1, Youth STD programs-1, Education-1)	1	0	0	25	26
TOTAL	67	258	716	1,662	2,703

CDGA – Con Plan Community Meetings**All meetings were held from 6pm – 8pm**

Meeting Date	Location
Thurs. March 26	St. Adalbert's School-1913 W. Becher St.
Tues. March 31 st	Northside Church of God in Christ-4848 N. 19 th Street
Wed. April 1 st	Northside YMCA-1350 W. North Ave.
Wed. April 8 th	Gordon Park Pavilion-2828 N. Humbolt Ave.
Tues. April 14 th	YMCA-Cudahy Branch-9050 N. Swan Rd.
Thurs. April 16 th	Wisconsin Black Historical Society-2620 W. Center St.
Tues. April 21 st	Redemption Lutheran Church-5641 N. 68 th St.
Thurs. April 23 rd	LAND – 3701 W. Lisbon Ave.
Tues. April 28 th	Boys & Girls Club-3400 W. North Ave.
Wed. April 29 th	Hillside Family Resource Center-1452 N. 7 th St.
Wed. May 6 th	House of Peace-1702 W. Walnut St.
Thurs. May 7 th	United Community Center-1028 S. 9 th St.
Tues. May 12 th	Marquette High School-3306 W. Michigan St.
Thurs. May 14 th	Garden Holmes Lutheran Church-2450 W. Roosevelt Dr.
Wed. May 20 th	M&I Bldg; 2745 N. MLK DR.
Wed. June 3 rd	YMCA- Parklawn-4340 N. 46 th St.
Thurs. June 4 th	St. Joseph's Hospital-5000 W. Chambers, M101-Marquette Room

Public Hearings on the 2010-2014 Consolidated Plan

In accordance with the regulations of the U.S. Department of Housing and Urban Development, the City of Milwaukee prepared a "draft" of the 2010-2014 Consolidated Plan and Strategy. The public comment period for review of the Plan was **June 26, 2009 through July 27, 2009**.

CDGA notified all funded community agencies, NRSA coordinating agencies, elected officials and other interested persons through mailings. CDGA also published the availability of this report on the City's website and in the publications on the dates listed below and has submitted copies for public review at six local libraries, CDGA offices and the City Legislative Reference Bureau.

Public hearings were held to solicit citizen input on the *5-Year Consolidated Plan*, which outlines the range of activities that may be undertaken, the amount of federal funds available and any significant program changes. The public hearings were conducted by members of the Community and Economic Development Committee, the official oversight body for Federal grant funds. All public hearings were held at times and locations convenient to citizens, potential and actual beneficiaries, community-based agencies and other interested parties, with accommodations provided for persons with disabilities. These public hearings were held in the evenings and at locations in the community that are accessible for persons with disabilities. The public hearings were well publicized through newspaper notices, including Spanish language papers. In addition, two of the meetings were held at agencies that are located in neighborhoods with a majority of African American, Hispanic and non-English speaking persons.

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

CDGA provided copies of the *Plan* to interested citizens and other stakeholders to solicit community/resident feedback.

Official notices for the public hearings on the 2010 Funding Allocation Plan were published in the following newspapers:

Milwaukee Journal/Sentinel, June 26, 2009
Milwaukee Community Journal, June 26, 2009
West Bend Daily News/Hartford Press (HOPWA), June 22, 2009
El Conquistador, June 26, 2009
Port Publications/Ozaukee Press (HOPWA), June 22, 2009
Waukesha Freeman (HOPWA), June 22, 2009

Public Hearing Dates on 2010-2014 Consolidated Plan

- 1) Tuesday, July 14, 2009, United Community Center, 1028 S. 9th Street; 6:00-8:00pm
- 2) Wednesday, July 15, 2009, Dr. Benjamin Carson Academy of Science; 4920 W. Capitol Drive; 6:00-8:00pm
- 3) Monday, July 20, 2009; City Hall, 200 East Wells Street; 9:00 am

The Consolidated Plan was approved by the Community and Economic Development Committee on July 20, 2009 and approved by the Milwaukee Common Council on July 28, 2009 and ratified by the Mayor.

- 1) Milwaukee Journal/Sentinel, June 26, 2009
- 2) Port Publications/Ozaukee Press, June 22, 2009(HOPWA)
- 3) The Waukesha Freeman, June 22, 2009(HOPWA)
- 4) Milwaukee Community Journal, June 26, 2009
- 5) El Conquistador, June 26, 2009
- 6) West Bend Daily News/Hartford Times Press, June 22, 2009(HOPWA)

As of July 31, 2009, a letter was received from Independence First regarding persons with disabilities. A copy of the letter is included in the *Additional Files Folder*.

PRIORITY NEEDS ANALYSIS AND STRATEGIES

91.215(a)

II. STRATEGIC PLAN

The strategic plan must be developed to achieve the following statutory goals and objectives, principally for extremely low-, low-and moderate-income residents:

- provide decent housing and
- a suitable living environment and
- expand economic opportunities.

Priority Needs Analysis and Strategies 91.215 (a)

13) In this narrative, describe the reasons for setting priorities for allocating investment among different activities and needs, as identified in tables* prescribed by HUD.

92.215(a)(1)

****If not using the CPMP Tool: Complete and submit Table 1A Homeless and Special Needs Population; Table 1B Special Needs (Non-Homeless) Populations; Table 2A Priority Housing Needs/Investment Plan Table; and Table 2B Priority Community Development Needs.***

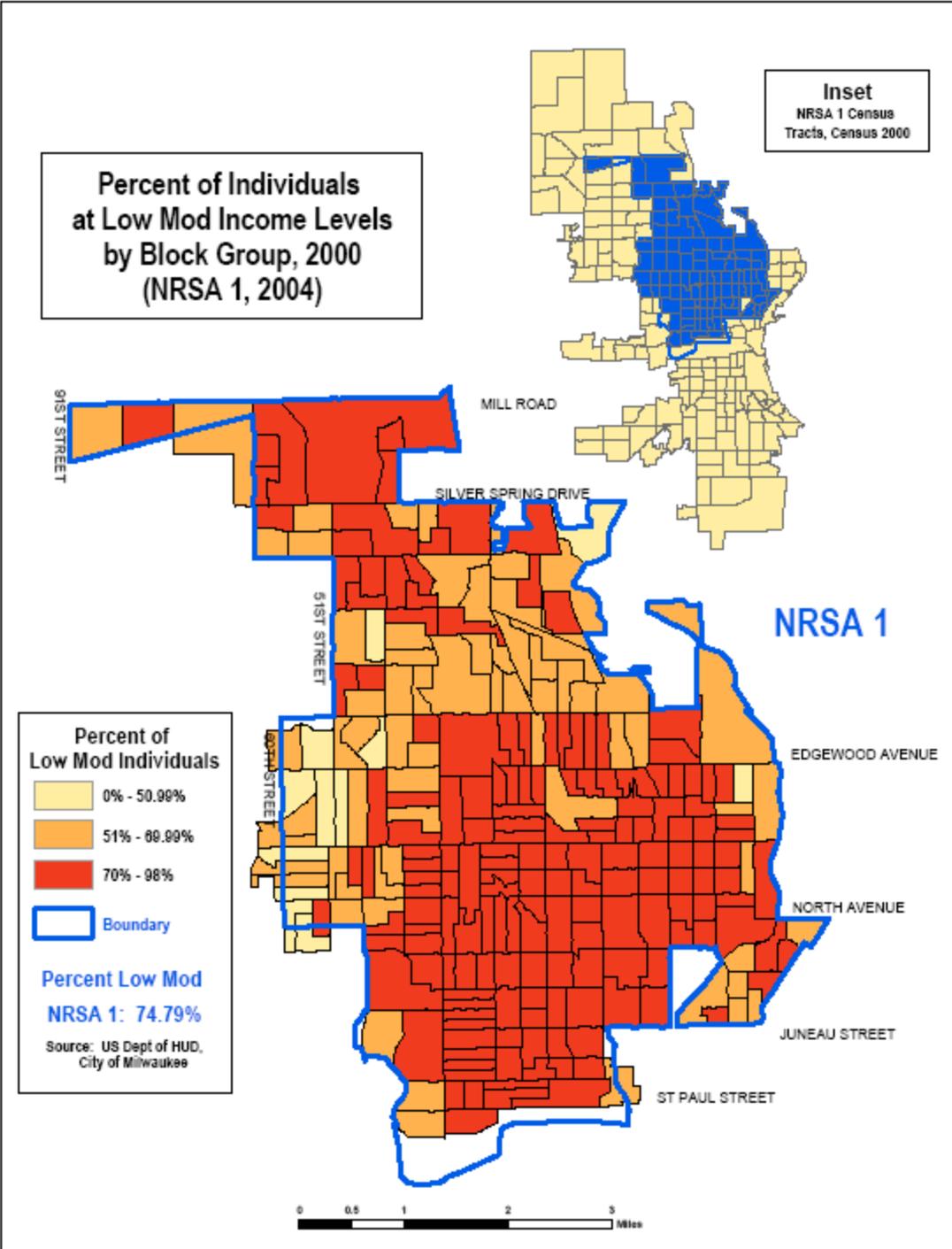
****If using the CPMP Tool: Complete and submit the Needs Table file: Needs.xls***

See Needs Table located in the CPMP Tool.

14) Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.

Geographic Distribution: The geographic distribution for these entitlement funds, with the exception of HOPWA funds, is the Community Development Block Grant Target area which also includes two(2) Neighborhood Revitalization Strategy Areas (NRSAs). The HOPWA funds cover the four-County Milwaukee Metropolitan Statistical Area comprised of: Milwaukee, Waukesha, Ozaukee and Washington counties.

See maps and NRSA census tracts on the following pages.



**Percent of Individuals
at Low Mod Income Levels
by Block Group, 2000
(NRSA 2, 2004)**

Inset
NRSA 2 Census
Tracts, Census 2000

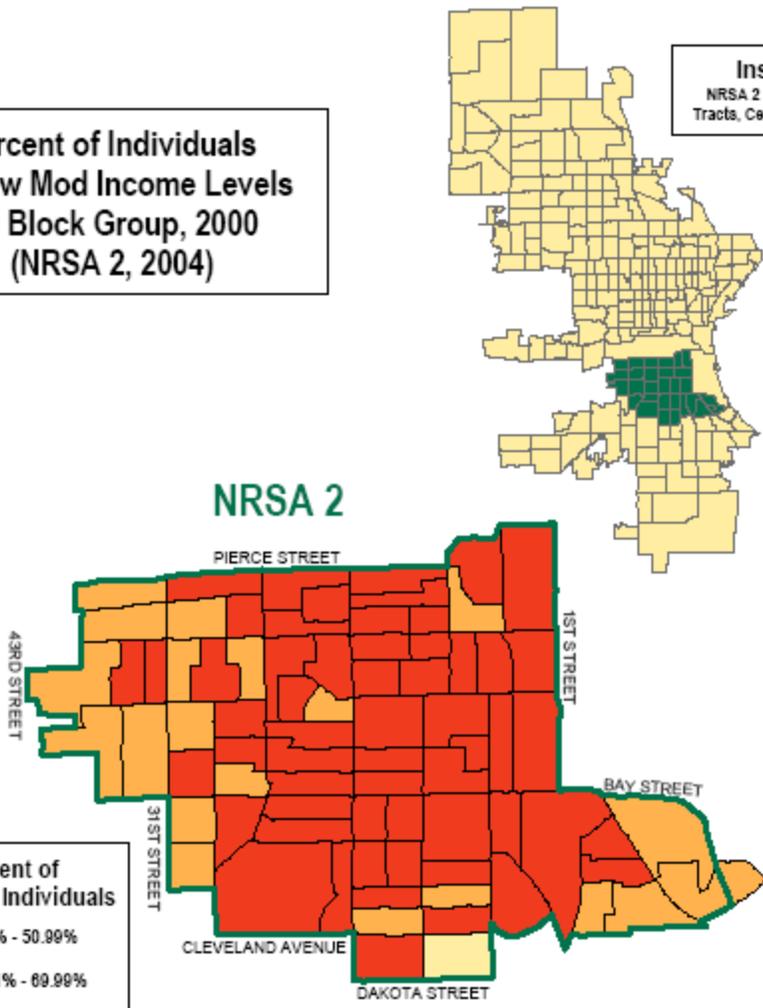
NRSA 2

**Percent of
Low Mod Individuals**

- 0% - 50.99%
- 51% - 69.99%
- 70% - 98%
- Boundary

Percent Low Mod
NRSA 2: 75.98%

Source: US Dept of HUD,
City of Milwaukee



15) If applicable, identify the census tracts for Neighborhood Revitalization Strategy Areas and/or any local targeted areas.

NRSA BOUNDARIES

NRSA 1 CENSUS TRACTS

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

NRSA 2 CENSUS TRACTS

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

16) Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)).

Basis for Priorities and Allocation of Funds

Racial/Ethnic Geographic Concentrations

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

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

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

Low Income Concentration

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

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

NRSA Area	Total Population*	Total Low/Moderate Income Population*	Total Percent Low/Moderate Income Persons*	Proposed % of funds for NRSA 1 & 2
NRSA #1 (North)	216,718	162,104	74.79%	21.8%
NRSA #2 (South)	84,910	64,519	75.98%	8.8%

* (Based on U.S. Census 2000)

17) If appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to Neighborhood Revitalization Strategy Areas and/or any local targeted areas.

See chart above

18) Identify any obstacles to meeting underserved needs.

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.

Specific Objectives 91.215 (a) (4)

19) Summarize priorities and specific objectives the jurisdiction intends to initiate and/or complete in accordance with the tables* prescribed by HUD.

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

**If using the CPMP Tool: Complete and submit the Summaries Table file: Summaries.xls*

See Summaries table.

PERFORMANCE MEASUREMENTS

As stated earlier, in compliance with the new Federal Notice of Outcome Performance Measurement System for grant funded programs, the City of Milwaukee is required to include quantifiable performance measurements into the Consolidated Plan and subsequent Annual Action Plans. The new performance measures quantify program outcomes as follows:

HUD Objectives

- ***Create suitable living environments*** – This objective relates to programs that benefit individuals, families and communities by addressing issues to improve their living environment
- ***Provide decent housing*** – This objectives relates to housing activities
- ***Expand economic opportunities*** – This objective relates to economic development programs, neighborhood commercial revitalization and job creation.

HUD Outcomes

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

As indicated on the following chart, each proposed objective corresponds to a HUD Outcome Category and HUD Objectives as follows: (see also Summaries Tables)

CITY OF MILWAUKEE

Summary of Proposed Activities for 2010-2014 Consolidated Strategy and Plan

PROPOSED ACTIVITY	HUD OBJECTIVE	HUD OUTCOME
HOUSING	Decent Housing	Affordability
ECONOMIC DEVELOPMENT/ JOB CREATION	Expand economic opportunity	Sustainability
EMPLOYMENT SERVICES (Job Training & Placement)	Expand economic opportunity	Sustainability
MILWAUKEE MAINSTREET PROGRAM	Expand economic opportunity	Sustainability
HOMELESS SHELTERS	Suitable Living Environment	Availability/Accessibility
COMMUNITY ORGANIZING/ CRIME PREVENTION/ COMMUNITY PROSECUTION	Suitable Living Environment	Sustainability
DRIVER'S LICENSE RECOVERY & EMPLOYABILITY PROGRAM	Suitable Living Environment	Sustainability
HOMEBUYER COUNSELING	Suitable Living Environment	Sustainability
YOUTH SERVICES	Suitable Living Environment	Sustainability
GRAFFITI ABATEMENT	Suitable Living Environment	Sustainability
COMMUNITY OUTREACH & TECHNOLOGY CENTER	Suitable Living Environment	Sustainability
ACCESSIBILITY FOR DISABLED PERSONS	Suitable Living Environment	Availability/Accessibility
FOCUS (FIRE PREVENTION)	Decent Housing	Sustainability
CODE ENFORCEMENT	Decent Housing	Sustainability
FAIR HOUSING	Decent Housing	Affordability
LEAD PREVENTION/ ABATEMENT	Decent Housing	Sustainability
HOUSING & SUPPORTIVE SERVICES FOR PERSONS WITH HIV/AIDS	Suitable Living Environment	Availability/Accessibility
ACQUISITION OF REAL PROPERTY	Suitable Living Environment	Sustainability
DISPOSITION	Suitable Living Environment	Sustainability
PUBLIC FACILITIES & IMPROVEMENTS	Suitable Living Environment	Sustainability
BROWNFIELDS	Suitable Living Environment	Sustainability

GENERAL PRIORITY NEEDS ANALYSIS AND STRATEGIES

91.215 (a)

Describe the reasons for setting priorities for allocating investment among different activities and needs, as identified by HUD.

See following pages

HOUSING NEEDS

91.205

- 20) In this narrative, describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).
- 21) To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must provide an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

HOUSING NEEDS OF VARIOUS POPULATIONS

Low Income Homeowning Households

The Federal government's standard for affordable housing is that no more 30% of household income should be spent on housing related costs. According to HUD, "families who pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording basic necessities such as food, clothing, transportation and medical care." During the past few years, costs for these basic needs have risen dramatically.

In 2000, 19,073 owner-occupied households in the Milwaukee area had incomes at 50% or less of the Median Family Income (MFI) while 21,954 owner-occupied units had incomes between 50%-80% of the MFI. Additionally, 8,328 homeowning households had income levels less than 30% of the MFI. (*HUD:CHAS Data Book-2000; Housing Output for All Households*)

The median cost of housing for owners in the Milwaukee area in 2000 was \$863 per month compared with \$322 for owners without a mortgage and included mortgage payments, real estate taxes, utilities, property insurance, as well as other costs.

The annual median household income in the City of Milwaukee for owners in 2000 was \$32,216. (*U.S. Census Bureau 2000*).

Low Income Rental Housing

In 2000, 60,950 renter households in the Milwaukee area had incomes at 50% or less of the MFI; 28,702 renter households had incomes between 50%-80% and 38,394 had incomes below 30% of the MFI. As of 2009, fair market rent for a two-bedroom apartment in Milwaukee is about \$839. According to the 2008 study by the National Low Income Housing Coalition, in order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$33,560 annually. (*U.S. Census Bureau 2000*)

Minority Households

Within the City of Milwaukee, 36.9% or 220,432 households were African American. In 2000, African American householders paid out a higher proportion of family income for rental costs than did other renters. Over 40% of African American households spent more than 30% of their income for housing while for other groups the percentage was around 30% or less. (*U.S. Census Bureau 2000*)

African Americans generally had more problems with the physical condition of their homes than other households in the Milwaukee area and had such problems with upkeep, public hallways, plumbing, heating, electrical systems and kitchens. Poor upkeep was the most commonly reported deficiency. (*U.S. Census Bureau 2000*)

Family Renters

The major concerns in family rental housing center on affordability, availability, quality, size and location. For many low income people residing in Milwaukee, obtaining decent rental housing that meets standards of decency in terms of the above criteria (i.e. plumbing, electrical systems etc.), is difficult. According to the 2000 U.S. Census, there were 80,739 households with children, or 34.8% in the City of Milwaukee in 2000. Key issues in family rental housing include the following:

- ❖ **Affordability:** Large numbers of Milwaukee families, especially in the central city cannot afford decent and reasonably priced rental housing.
- ❖ **Availability:** Rental housing appropriate for low income families is not readily available in all areas of the city.
- ❖ **Quality:** Structurally sound and up-to-date rental units for low income families are not available in all areas of the City of Milwaukee.
- ❖ **Appropriate Size:** Significant proportions of large families in Milwaukee reside in cramped, overcrowded and unsafe rental housing units.

Unit Appropriateness

Data provided by the Department of Housing and Urban Development indicate that there is a substantial need for affordable housing units for renter households with incomes below 50% of the Median Family Income (MFI). (*HUD CHAS Data: Housing Problems Output for All Households-2000*).

Homeownership Among Families

The desire for homeownership, particularly among families, is a major concern for residents in Milwaukee and particularly for low income households. Although Milwaukee residents discussed it in a variety of contexts, home ownership was consistently seen as a stabilizing force for families and neighborhoods alike. Residents also clearly recognized the importance of maintaining and rehabilitating the housing stock in Milwaukee's central city so that affordable housing is available to low income families.

As of 2009, the City of Milwaukee had a total of 89,018 single family owner occupied units with a median value of \$124,644. (*City of Milwaukee Assessor, 2009*).

Key issues relating to home ownership for families include the following:

- ❖ Access to conventional mortgage loans for low income people must be widened. Many low income residents in Milwaukee desire homes, are committed to their neighborhoods, but cannot qualify for loans.
- ❖ Efforts to enhance family-owned housing should be concentrated in the central city.
- ❖ Large families would benefit greatly from homeownership. Overcrowding, high rents and relatively low numbers of structures with units that can accommodate large families have put pressure on this group.
- ❖ Safety in neighborhoods for family homeowners has become a key issue for many in Milwaukee's central city. Declining homeownership, deteriorating homes, closed businesses, drugs and violence all continue to erode the safety and well-being of homeowners.

- ❖ Many low income people want to acquire the various skills needed to be a homeowner. Many lack these skills but are highly motivated to learn the various financial, technical and practical aspects of homeownership.

The Influence of Race and Income on Homeownership

According to 2000 U.S. Census data, ownership rates increased for all minority groups in the 1990's. Asians experienced the largest increase, from about 25 percent in 1990 to 40 percent in 2000. About 33 percent of Blacks and Hispanics were homeowners in 2000 compared with 30 percent in 1990. All other minority group homeownership rates increased from about 25 to about 30 percent in 2000.

Characteristics	White	Black	Hispanic	Asian	American Indian	Total
Number of owners	57,173	18,560	4,339	1,147	539	82,308
Median Value	\$88,000	\$55,500	\$65,400	\$70,500	\$80,700	\$80,400
Median monthly costs (with mortgage)	\$897	\$790	\$823	\$815	\$884	\$863
Median monthly costs (without mortgage)	\$327	\$291	\$314	\$344	\$330	\$339

(Source: U.S. Census Bureau 2000)

Elderly Households

Approximately 43,569 of Milwaukee's households were headed by individuals classified as elderly (65 and older). Of the total population living below the federal poverty level in the Milwaukee Metropolitan Area, 11% or 6,752 were aged 65 or older. Considering that a substantial number of older adults in the Milwaukee Metropolitan Area live on total household income between \$10,000 and \$15,000 per year, constantly rising rents is of great concern to the elderly *(U.S. Census Bureau 2000)*.

Already a significant population in many neighborhoods, elderly homeowners will increase steadily in the years to come, presenting a special set of housing concerns.

The following are major issues for older adult homeowners:

- ❖ Older adult homeowners need safe neighborhoods as many of Milwaukee's elderly are highly at-risk for certain types of crime including burglary, assault and physical and sexual abuse. They are often afraid to leave their homes and feel trapped resulting in isolation and dependence.
- ❖ The elderly or disabled homeowner is most at risk of losing their homes due to rising taxes and property assessments, while living on a fixed income.
- ❖ Maintenance and repair of elderly owned homes is a major concern as many older adults living on fixed incomes can no longer maintain their homes and exterior premises. Deterioration results and the safety of owners and neighbors can be compromised.
- ❖ Older adults need assisted living programs as many elderly homeowners are emotionally unwilling or economically unable to leave their homes, yet need assistance with day-to-day routines.

- ❖ Elderly duplex owners are losing needed income from unrented units as many do not rent out of fear and their inability to maintain and repair units. They also need assistance in recovering rental income.
- ❖ Homes owned by the elderly need to be made accessible as many older adults have difficulty entering and leaving their homes as well as moving efficiently inside them.

Housing Needs of Persons with HIV and AIDS

According to the Wisconsin Division of Health, Milwaukee County remains the epicenter of the AIDS epidemic in the State of Wisconsin, with 5,473 cumulative number of reported AIDS cases. (*State of Wisconsin Division of Health, 2008*)

Housing options are a critical need for persons with HIV/AIDS and their families. When housing is inadequate, surviving day-to-day takes precedence over managing HIV. Housing provides the necessary foundation for the provision of other components necessary to maintain an individual's health and well-being.

(See section on Housing Opportunities for Persons with AIDS for more specific information on the housing needs of this population).

Needs of Homeless Sub-Populations

According to the *Milwaukee Continuum of Care Planning Group*, affordable housing is a major need of homeless persons, as well as supportive services to help persons achieve self-sufficiency and maintain permanent housing. The report cites the dramatic decrease in affordable housing due to the demolition of single room occupancy hotels in Downtown, Milwaukee, representing the loss of hundreds of affordable housing units.

In addition, the report notes that there are a substantial number of homeless individuals who are chronic substance abusers. These individuals are in need of housing and supportive services designed to assist them in overcoming their dependencies. Unfortunately, access to providers of services for these individuals continues to be limited and the temporary and long-term affordable housing needs for this population is significantly unaddressed. While existing housing resources meet approximately 30% of the emergency, transitional and supportive housing needs of the homeless population in general, those with alcohol and drug dependency issues are largely underserved, when it comes to receiving treatment and counseling services.

Chronically Homeless Persons

According to the Milwaukee Continuum of Care Planning Group, there are approximately 253 persons who are considered chronically homeless. The Milwaukee Continuum of Care defines chronically homeless as, "...*unaccompanied individuals with a disabling condition who are continuously homeless for a year or more or have had at least four episodes of homelessness in the last three years. These are individuals who alternate living outside with episodes in shelters, institutions or doubling up with others*". The chronically homeless in Milwaukee are predominantly male, African American, over the age of 36, unemployed, in need of substance abuse treatment, and/or in need of mental health treatment. In addition, about one in seven is on probation or parole. There is a great need for more adequate emergency housing for this population which often has substance abuse and mental health issues.

Single Women with Families and Children

According to data from the 2000 U.S. Census, Milwaukee has a total of 36,669 female-headed households with children under the age of 18. Of this total, 15,739 or 42.9% are below the federal poverty level. This population has a great need for larger, more affordable housing units along with a variety of social service needs such as healthcare, childcare, AODA and mental health services and access to better-paying jobs.

Racial or ethnic group with a disproportionately greater need

To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must provide an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

The City of Milwaukee acknowledges HUD's Racial Disparity Chart which is included as part of the Con Plan Tool; however, the City of Milwaukee does not believe this is applicable due to the enormity of the housing needs of the low income population in the CDBG target area which crosses all ethnic and racial groups.

Sub Prime Lending

(Excerpt from Legal Action of Wisconsin-Report on Milwaukee's Housing Crisis: Foreclosures, Evictions & Subprime Lending)

Subprime lending jumped dramatically in Milwaukee from 206 mortgages totaling \$7.7 million in 1993 to 10,451 subprime mortgages totaling over \$1 billion in 2005, with African Americans largely receiving these high cost loans. Many subprime lenders typically target central city areas where property values have skyrocketed, making residents easy targets for high-risk lenders peddling subprime high cost housing and refinancing loans whereby homeowners take out new mortgages to obtain cash to pay for other debts and obligations. The nine zip codes of the CDBG target area recorded over 5,000 refinancing loans a year to owner occupants from 2003 to 2005.

Further impacting the problem is that incomes remained relatively flat during 2000-2006 in the nine inner city zip codes of the CDBG target area, while gas and electricity costs rose 46% and property taxes increased 62% for duplexes and 50% for larger single family homes (*Wisconsin Dept. of Revenue*). As a result, there been a dramatic increase in the number of home foreclosures and evictions. The future of these neighborhoods is linked to stalls in housing values and financial problems of subprime lenders.

2006 Home Mortgage Disclosure Act (HMDA) data and new 2006 American Community Survey (ACS) census data discloses the impact on neighborhoods because of the subprime lending crisis. This along with property tax and utility increases and decreasing incomes have greatly impacted the affordability of housing in Milwaukee's central city neighborhoods.

The census data reports the following:

- 41% of City of Milwaukee homeowners with mortgages and 56% of City renters were spending 30% or more of their total income for housing.
- The percentage of homeowners with a mortgage increased, especially in the City of Milwaukee where 68% of homeowners had a mortgage in 2000, but that figure jumped to 74% in 2006.
- Homeowners in the City of Milwaukee spending less than 30% of their income on housing dropped from 73% of those with a mortgage in 2000 to 57% of those with a mortgage in 2006.
- Mortgaged households spending more than half of their income on housing nearly doubled from 10% in 2000 to 19% in 2006.
- Approximately 13,896 adults and children are living in the City of Milwaukee whose mortgage payments and other housing expenses totaled 75% or more of their household income.

Renters on Public Assistance

No population was harder hit than renters on public assistance who are very heavily concentrated in the City of Milwaukee's poorest neighborhoods. Inner city neighborhoods showed dramatic increases in home purchase prices where housing prices – and sales activity – had been historically very low prior to the subprime mortgage lending escalation. As sales activity and prices rose two to fourfold or more in these neighborhoods, property taxes rose sharply, increasing homeowner costs and resulting in rent increases for tenants. In the innercity Milwaukee zipcodes, from 2000 to 2006 property tax bills increased by 62% on average for duplexes and 50% for 4-bedroom houses. Utility costs for electricity and heat also rose dramatically. As a result, a growing number of renters in Milwaukee are spending large portions of their income on housing. (2006 American Community Survey)

The American Community Survey also shows an increase in renters on public assistance with 51,000 children on public assistance (including food stamps, welfare and disability) and living in rental units. Of these children, a reported 24% lived in households paying over 75% of their income on housing costs and another 24% in households paying 50 to 74% of their income for housing costs (i.e., rent and utilities).

Borrowing for Owner-Occupied Housing Increases in CDBG areas

For owner-occupied housing, borrowing slowed in the suburbs, with total mortgages issued in 2006(14,867) down 11% from those issued in 2005(16,695). At the same time, City of Milwaukee residents showed a 13% increase in mortgages for owner-occupied houses (from 23,676 mortgages issued in 2005 to 26,892 issued in 2006), largely due to a 30% increase in borrowing in the central city neighborhoods (where mortgages increased from 9,673 in 2005 to 12,609 in 2006).

In the central city Milwaukee Community Development Block Grant (CDBG) neighborhoods over half (59%) of mortgages issued in 2006 were either subprime loans or high-interest loans with rates several points above mortgages issued to other borrowers. In the rest of the City of Milwaukee these higher risk loans made up 39% of mortgages issued, and in the suburbs they made up 23% of mortgages issued. (Legal Action of Wisconsin 2007 Housing Update, prepared by the UWM Employment and Training Institute)

Refinancing Loans

Refinancing loans in 2006 were down 20% over the numbers issued in 2005 yet still made up half (51%) of the mortgages issued to owner-occupants, with 41% of loans for home purchases and 8% for home repair. The poorest neighborhoods in the CDBG target area recorded over 5,000 refinancing loans a year to owner-occupants from 2003 through 2006. Eighty percent of these loans were high-risk mortgages, compared to 30% in the suburbs. In the central city neighborhoods targeted by the Community Development Block Grant (CDBG) program high-risk loans made up 59% of all housing mortgage activity in 2006, up sharply from prior years. Total mortgage lending in these 9 zip code neighborhoods has exceeded \$1 billion in each of the last three years. (Legal Action of Wisconsin 2007 Housing Update, prepared by the UWM Employment and Training Institute)

Most troubling is the large volume of loans issued to low income families throughout Milwaukee County with household incomes below \$30,000. During the last four years, 14,985 mortgage loans were issued to households with less than \$30,000 in income. Half (51%) of these mortgages were made to home buyers in the CDBG neighborhoods. It is in the area of refinancing loans that the sharpest disparities are seen by race. When the race of borrowers (owner-occupants) obtaining refinancing loans from subprime lenders are examined, African Americans are far more likely to obtain these high-cost loans. 38% of African Americans obtaining refinancing loans in 2006 were with a subprime lender and another 33% received high-interest rate loans from non-subprime lenders, with only 33% receiving loans at regular initial rates from non-subprime lenders. In contrast, only 19% of

whites obtaining refinancing loans in 2006 were with a subprime lender and another 18% received high-interest rate loans, with the majority (63%) having loans at regular initial rates from non-subprime lenders. Latinos also showed more favorable borrowing, with 24% obtaining their refinancing loans from a subprime lender and another 25% receiving high-interest rate loans. Approximately 51% of Latinos obtained refinancing loans from non-subprime lenders and at regular market rates. (*Legal Action of Wisconsin 2007 Housing Update, prepared by the UWM Employment and Training Institute*)

2006 HMDA Analysis by Race **Racial Disparities for Housing Loans in the City of Milwaukee**

The HMDA files include data on the race of borrowers for housing loans. Mortgages were examined for owner-occupants in the City of Milwaukee.

In 2006, both African Americans and whites showed the highest number of loans for refinancing (55% of loans by African Americans and 52% of loans by whites). Home purchase loans comprises 47% of mortgages for Latinos, followed by refinancing loans (46%) and home repair loans (7%).

When the type of mortgage obtained was analyzed, African Americans showed far more higher cost loans from subprime lenders or with interest rates well above the regular rate. In 2006 over 2/3 (69%) of African Americans obtained mortgages had higher-risk (and inevitably higher-cost) loans from subprime lenders or with above prime interest rates. By contrast, less than 1/3 (30%) of whites had subprime or high-interest rate loans. Latinos in Milwaukee showed better mortgage conditions than African Americans but poorer than those for white borrowers, with 50% of 2006 borrowers having subprime or high interest rate loans.

HOUSING MARKET ANALYSIS (91.210)

25) Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families.

26) Provide an estimate; to the extent information is available, of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.

27) Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

Housing Tenure in Milwaukee

According to data from the 2000 U.S. Census, Milwaukee had a total of 249,215 housing units in 2000, representing a decline of nearly 5,000 housing units from 1990. Although approximately 7,000 housing units were constructed during the 1990's, approximately 12,000 housing units were lost. As a result, the vacancy rate was 6.8 percent, higher than the 1990 rate. In addition, during the 1990's, new construction increased the number of housing units with four or more bedrooms. The rate of owner occupancy increased slightly during the 1990's from 44.8 percent to 45.3 percent or 232,188 households. The occupancy rate for rental units was 105,235 in 2000. According to census data, owner occupancy rates remained stable in many areas with the most increases recorded in the central city and downtown areas primarily due to new condominium units being constructed and in the central city, the replacement of demolished deteriorated units with new construction of single family homes. (*U.S. Census 2000; Milwaukee Urban Atlas*)

General Population

Like most major American cities, Milwaukee has lost population over the past few decades and between 1990 and 2000, experienced a five percent population decline (31,114 persons). In contrast, each of the surrounding suburban counties, (Ozaukee, Waukesha and Washington counties) were steadily gaining population as out-migration occurred from the city as well as attracting new Milwaukee area arrivals. (*U.S Census Bureau 2000*).

As the chart below illustrates, Milwaukee became a minority/majority city during the 1990's with each minority group increasing with the exception of American Indians. However, the Milwaukee metro area continues to be segregated. Forty percent of the County population resides in the City of Milwaukee; 85% of the area's minorities live in the City of Milwaukee; with 95% of Blacks, 75% of Hispanics and 60% of other minorities residing in the City of Milwaukee.

Race	1990		2000	
	Total	Percent	Total	Percent
White	381,714	60.8%	270,989	45.4%
Black	189,408	30.2%	220,432	36.9%
Hispanic	39,409	6.3%	71,646	12%
American Indian	5,213	0.8%	4,313	0.7%
Asian or Pacific Islander	11,429	1.8%	17,561	2.9%
Other race	915	0.1%	978	0.2%
Two or more races	*	*	11,055	2.1%

(Source: U.S. Census Bureau – 1990, 2000)

* Not comparable with previous censuses as people were allowed to indicate more than one race in 2000.

Age of the Population

Milwaukee's age distribution reflects many social and demographic changes. Between 1990 and 2000, the population increased in the 5-17 and 35-54 year age groups despite an overall decrease in population. A decrease in persons in the 55-64 age group and in older age groups occurred, implying less demand for housing units designed for the elderly over the next decade. However, there could be more of a demand for improved amenities for older persons to remain in their existing units.

The age distribution of the population is a key factor in housing planning since family formation is the driving force in housing need. If the overall population is aging, with younger families choosing to establish a household outside of the City of Milwaukee, less demand will occur for housing. A growth in the population during the family formation, especially if that growth is in the minority population which is likely to endure continuing disparities in housing choice, warrants the need for increasing affordable housing.

Structural Quality

The age of a housing unit is not an absolute predictor of housing quality. Milwaukee has many neighborhoods with very old housing which are attractive, safe, and well-maintained. However, the age of a housing structure does signal likely code compliance problems, especially an increased likelihood of the presence of lead-based paint. For that reason a discussion of housing conditions begins with a look at the age of Milwaukee's housing stock:

<u>Structural Quality</u>	<u># Structures</u>	<u>Percent</u>
Built before 1940	83,742	33.6%
Built 1940-1959	89,416	35.9%
Built 1960-1969	34,418	13.8%
Built 1970-1979	24,935	10.0%
1980-2000	6,704	6.7%

(U.S. Census Bureau-2000)

The majority of the units built before 1940 are located in the central city. The majority of the units built between 1940 and 1959 are located in the northwest side and far south side of the city, while those built after 1959 tend to be located on the periphery of the city and most recently, newer structures developed in the central city and downtown.

Overcrowded Housing

Although average household size declined, there was an increase in the number of households living in overcrowded housing. The U.S. Census defines Overcrowded as a household that has more persons than the number of rooms it occupies. In 2000, 6 percent of the City's households were overcrowded compared with 4.3 percent in 1990. The incidence of overcrowded households is higher in some south side areas than the incidence of larger households. Neighborhoods nearer the edge of the city have larger housing units but older, smaller households. *(U.S. Census Bureau 2000, Milwaukee Urban Atlas).*

Substandard Housing

One set of problems with Milwaukee's housing stock stems from the age of housing units. According to the 2000 Census, approximately 33.6 % (83,742) of the housing units in the City of Milwaukee were built before 1940. Of Milwaukee's total of 249,215 housing units in 2000, rental occupied housing units made up 54.7% or 126,953 of all households in Milwaukee. According to past estimates of the Department of Neighborhood Services, of all housing units, more than 10,000 residential structures required more than routine maintenance. A past survey of board-ups by the Department of City Development identified over 700 boarded up homes in the City. Although there are slight fluctuations, this figure has been relatively consistent over the past five years.

Vacancy Rates

Vacancy rates vary by unit size and location. Overall, there is a 6.8% vacancy rate with the highest concentration in the central city and on the northwest side. (U.S. Census 2000)

Property Type	# Parcels Yr. 2003	# Parcels Yr.2009	Average Assessed Value Yr. 2003	Average Assessed Value Yr. 2009
Single Family	87,458	89,018	\$88,500	\$124,644
Two Family	34,314	33,986	\$75,400	\$119,878
Three Family	1,580	1,552	\$81,850	\$153,710

(Source: City of Milwaukee Assessor – Year 2003; Year 2009) Excludes condominiums and multiple unit parcels

Household Size

Milwaukee had 232,188 households in 2000, compared with 240,540 in 1990. The decline was due to a decrease in housing units in the city and an increase in the vacancy rate. The average household size decreased slightly during the 1990's but the number of family households with six or more persons increased in 2000 to 12,723 from 11,986 in 1990. (U.S. Census Bureau 2000).

Minorities account for the largest household size with Black and Indian households averaging three persons and Asians four persons per household. The largest households lived in minority dominated census tracts and most were in the oldest parts of the City of Milwaukee where many of the housing units are small.

HOUSING STRATEGY SPECIFIC OBJECTIVES/HOUSING 91.215 (b)

Note: Each specific housing objective must specify the number of extremely low-income, low-income, and moderate-income households to whom the jurisdiction will provide affordable housing as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. (24 CFR 91.215(b)(2))

- 27) Identify each specific housing objective by number (DH-1, DH-2, DH-2), contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period, or in other measurable terms as identified and defined by the jurisdiction.** *Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls file.*

See Summaries file located in the CPMP Tool.

- 28) Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.**

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.

- 29) Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units.**

See Narrative below.

- 30) If the jurisdiction intends to use HOME funds for tenant-based rental assistance, specify local market conditions that led to the choice of that option.**

The jurisdiction does not intend to use HOME funds for tenant-based rental assistance.

Housing and Community Development 5-Year Strategy

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

Reason for Priorities and Obstacles to Addressing the Housing Needs

Homeownership

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

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

Rental Housing

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

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

Safe and Well-Maintained Neighborhoods

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

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

STRATEGIC GOAL: EXPANDED HOMEOWNERSHIP AND OWNER-OCCUPIED HOUSING

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

Implementation Strategy:

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

STRATEGIC GOAL: EXPANDED RENTAL HOUSING AND REHABILITATION

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

Implementation Strategy:

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

**SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS
HOUSING**

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator (# units)	2-5 yr benchmarks	FY 2010 benchmarks
Acquisition of existing owner units- Acquire/Rehab/Sell	Expand the supply of affordable housing units for low income persons through acquisition/rehab/ sale.	Decent Housing	Affordability	# affordable units complete & sold to eligible persons	105	21
New Housing production (rental & owner-occupied)	Construct new owner-occupied & rental housing units for eligible households.	Decent Housing	Affordability	# affordable units complete & sold to eligible persons; #rental units complete & occupied by eligible persons	75	15
Housing-Targeted Code Enforcement	Increase targeted code enforcement to decrease decline in target areas.	Suitable living environment	Sustainability	# residential structures brought into code compliance	7,500	1,500
Rehabilitation of existing rental units	Rental rehab or provide forgivable loans for the rehab of residential rental units, for occupancy by low-moderate income households.	Decent Housing	Affordability	#affordable rental units complete & code compliant	275	55
Owner-Occupied Rehab Programs (Non profit agencies & City departments)	Provide forgivable housing rehab loans for repairs based on interior and/or exterior municipal code violations.	Decent Housing	Affordability	#owner-occupied units complete & code compliant	750	150
Fresh Start Youth Housing Apprenticeship Program	Provide apprenticeships for young persons in home repair and home construction.	Decent Housing	Affordability	#affordable units complete & sold to eligible persons	25	5
Minor Home Repair	Provide vouchers to income eligible homeowners for small home repairs to residential property.	Decent Housing	Affordability	#owner occupied units complete & properties improved	1,000	200
Housing Accessibility Program	Construct handicapped ramps and other accessibility modifications	Decent Housing	Availability/ Accessibility	#units constructed & persons with increased accessibility	125	25
Graffiti Abatement	Abate graffiti nuisances on residential properties	Decent Housing	Affordability	#units of graffiti abated & properties improved	3,000	600
Lead Prevention & Abatement	Combat lead hazards through Inspection, testing and abatement in collaboration with existing housing rehab programs and the Milwaukee Health Department.	Decent Housing	Affordability	#units of housing tested & abated of lead hazards	3,000	600

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator (# units)	2-5 yr bench marks (Citywide)	FY 2010 bench marks (Citywide)
Housing-Targeted Code Enforcement	Increase targeted code enforcement to decrease decline in target areas	Suitable living environment	Sustainability	# residential structures brought into code compliance	7,500	1,500
Lead Prevention & Abatement	Combat lead hazards through Inspection, testing and abatement in collaboration with existing housing rehab programs and the Milwaukee Health Department.	Decent Housing	Affordability	#units of housing tested & abated of lead hazards	3,000	600
FOCUS (Fire Prevention)	Install free smoke detectors and provide fire prevention & education for residents; conduct screenings and referrals for additional social services.	Decent Housing	Affordability	#low income households assisted	5,000	1,000
Code Enforcement-Tenant Assistance program & Landlord/Tenant Compliance	Address identified code violations on rental properties through rent withholding and rent abatement; use rental proceeds for repairs related to health, safety and welfare of tenants.	Suitable living environment	Sustainability	#households assisted & number of repairs	8,500	1,700
Code Enforcement-Receivership of Nuisance properties	Address nuisance properties through Court ordered receivership to abate the nuisance, correct dangerous and defective conditions and maintain the premises consistent with securing safe and habitable conditions.	Suitable living environment	Sustainability	#properties inspected for receivership action & number of nuisance properties abated	500	100
Acquisition of Real Property	Acquire blighted properties for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	15	3
Disposition	Redevelop vacant lots and blighted parcels	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	1,500	300
Public Facilities & Improvements	Land management and redevelopment of vacant parcels	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	500	100
Clearance & Demolition	Demolish blighted parcels for eventual disposition	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	175	35
Cleanup of Contaminated Sites (Brownfields)	Remediation of Brownfields for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	50	10

NEEDS OF PUBLIC HOUSING

91.210 (b)

32) In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including:

- the number of public housing units in the jurisdiction,
- the physical condition of such units,
- the restoration and revitalization needs of public housing projects within the jurisdiction,
- the number of families on public housing and tenant-based waiting lists and
- results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25).

The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

Milwaukee Public Housing Authority

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

Mission

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

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including:

a. The number of public housing units in the jurisdiction.

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

b. The physical condition of such units.

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

c. The restoration and revitalization needs of public housing projects within the jurisdiction.

In addition to the restoration and revitalization needs of the public housing projects previously identified (Scattered Sites, Westlawn, round towers, Becher Court, College Court, and Lapham Park), the Housing Authority continually reassesses its properties and looks for opportunities to increase their marketability and long-term sustainability using results of the third-party physical needs assessment and feedback from staff, residents and stakeholders in the community.

d. The number of families on public housing and tenant-based waiting lists.

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

- e. Results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25).**

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

Public Housing Strategy

91.210

Public Housing Strategy

33) Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list).

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

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

Select all that apply

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

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

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

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

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

Select if applicable

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

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

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

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

Reasons for Selecting Strategies

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

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

34) Describe the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing.

The Housing Authority primarily relies on its Capital Fund allocation to revitalize and restore the needs of its public housing projects; however, staff also actively pursue other grant and Mixed Finance opportunities, including Hope VI and Section 42 tax credits, as well as financing products available through the U.S. Department of Housing and Urban Development. The Housing Authority's Annual Plan and Five-Year Plans provide additional detail about revitalization and restoration of its public housing units and activities to improve the management and operation of its public housing program.

35) Describe the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.

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

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

Objectives:

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

PHA Goal: Improve the quality of assisted housing

Objectives:

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

PHA Goal: Increase assisted housing choices

Objectives:

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

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

PHA Goal: Provide an improved living environment

Objectives:

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- Implement public housing security improvements:
- Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
- Other: Work to restore HUD funding for activities/services previously funded through PHDEP. Additional pressure for funding for security has been jeopardized by decreases in operating subsidy and HUD Capital Fund.

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

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

Objectives:

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

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

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

Objectives:

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

Other PHA Goals and Objectives:

- Continue the Section 32 Homeownership Program and sell 10 homes to eligible families.
- Use "force account labor", which includes the Housing Authority's carpenters, painters, and HVAC technicians to perform work funded through the Capital Fund grant.
- Continue the Section 8(y) Homeownership option and convert 10 households from rental to ownership.
- Develop, including acquisition and rehabilitation, market and sell market rate homes including the use of brokers.
- Develop and implement a Phase II redevelopment plan for the Convent Hill site.
- Submit at least one Hope VI application in response to the Notice of Funding Availability (NOFA). Redevelopment site(s) to be determined on the basis of the amount of the grant money available.
- Submit funding applications for Low Income Housing Tax Credits, the Affordable Housing Program and other sources necessary to support HACM property redevelopment.
- Continue to implement Asset Based Property Management and submit the Year 4 Stop Loss data by the required date.
- Close out the 2003 Scattered Sites Hope VI grant.
- Continue to operate the VA/SRO facility.
- Continue to administer the Veterans Administration Supportive Housing (VASH) grant through the Section 8 Voucher program.
- Continue to offer the "Make Your Money Talk" program. Enroll and graduate 20 families.
- Continue the HACM educational scholarship program. Award 25 scholarships.
- Prepare and implement a redevelopment plan for Westlawn and submit grant and other property related applications necessary to support the plan.
- Partner with Sun Starr to resubmit an application for Low Income Housing Tax Credits to support the redevelopment of the Becher Court property.
- Determine if resources are available to support an RFP for Project Based Section 8 assistance and complete an RFP if appropriate.
- Provide staff support for the City's Supportive Housing Commission.

- Continue to actively participate in the City's Continuum of Care. Partner with Community Advocates and Hope House and the Salvation Army to submit a Rapid Rehousing Project for funding under the McKinney-Vento Homeless Grant Program.
- Continue partnerships and MOU's with local community based organizations to provide tenant based Section 8 assistance, subject to availability, to eligible families referred by META House, the Milwaukee Community Service Corps, Independence First, St. Catherine's, the Pan African Community Association, and the Consortia to Re-Unite Families.
- Continue to offer the "Second Chance" program and place up to five eligible families, subject to availability, as referred by the Counseling Center, the Milwaukee Women's Center and Nia Imani Family Inc.
- Approach Salvation Army about partnering with HACM to make referrals to the "Second Chance" program.
- Apply for grants from all eligible sources of funding to support HACM functions and property redevelopment.
- Consider use of Capital fund and Operating fund reserves to leverage financing for redevelopment.
- Comply with the requirements of the Regulatory and Operating Agreements for public and assisted housing units owned by the Highland Park Development LLC, the Cherry Court LLC, the Convent Hill LLC, the Carver Park I & II LLC's, and the Scattered Sites I & II LLC's.
- Provide support for the 2009 resident event sponsored by the HACM Resident Advisory Board.
- Maintain "High Performer" status under the Section 8 Management Assessment Program and re-gain "High Performer" status under the Public Housing Assessment System.
- Submit applications as necessary for disposition and/or demolition of HACM property owned by the low income program.
- Use Energy Star standards and green technology to the maximum extent feasible in HACM new construction and redevelopment.
- Submit an application for Moving-to-Work or its successor program.
- Open the family public housing waiting list in 2009.
- Submit acquisition plans for developing public housing.
- Submit a waiver to convert some public housing units to project-based.
- Secure a line of credit for the revitalization of public housing.
- Work in partnership with the United Community Center to provide enhanced services for Housing Authority residents, including the submission of a low-income housing tax credit application to support the revitalization of Becher Court.
- Submit waiver requests, as needed, to effectively administer and revitalize HACM's subsidized programs.
- Work with the City of Milwaukee on neighborhood revitalization activities, including efforts to stabilize abandoned and foreclosed properties.
- Use project-based vouchers to support the revitalization of Scattered Sites.

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

See above

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

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

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary					
PHA Name: Housing Authority of the City of Milwaukee		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:		Federal FY of Grant: 2009	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	1,431,955			
3	1408 Management Improvements	1,431,955			
4	1410 Administration	715,978			
5	1411 Audit	10,000			
6	1415 Liquidated Damages				
7	1430 Fees and Costs	800,000			
8	1440 Site Acquisition	50			
9	1450 Site Improvement	330,000			
10	1460 Dwelling Structures	1,000,000			
11	1465.1 Dwelling Equipment— Nonexpendable	320,000			
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	80,000			
14	1485 Demolition	90,000			
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs	50,000			
18	1499 Development Activities	100,000			
19	1501 Collateralization or Debt Service	750,000			
20	1502 Contingency	39,838			
21	Amount of Annual Grant: (sum of lines 2 – 20)	7,159,776			
22	Amount of line 21 Related to LBP Activities	300,000			
23	Amount of line 21 Related to Section 504 compliance	50,000			
24	Amount of line 21 Related to Security – Soft Costs				
25	Amount of Line 21 Related to Security – Hard Costs				
26	Amount of line 21 Related to Energy Conservation				

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Milwaukee		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:				Federal FY of Grant: 2009		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Operations PHA-Wide	Operation	1406		1,431,955				
Management Improvements PHA-Wide	Security Staff Resident initiatives coordinator/consultant Management improv consultant Resident employment, job training and economic development, including: construction-inspection recycling program youth employment	1408		1,431,955				
Administration PHA-Wide	Project analyst, construction manager, contract administration, construction management, city attorney, and administrative assistant	1410		715,978				
Audit		1411		10,000				
Fees and Costs PHA-Wide	Architectural and engineering fees for design, bidding documents and inspection	1430		800,000				
Site acquisition	Acquisition of sites for development	1440		50				
Arlington Court WI002000013P	Parking lot and driveway improvements	1450		30,000				
Becher Court WI002000018P	Parking lot and driveway improvements	1450		30,000				
College Court WI002000011P	Parking lot and driveway improvements	1450		30,000				
Hillside Terrace WI002000001P	Parking lot and driveway improvements	1450		30,000				
Holton Tr/Scat Sites WI002000008P	Parking lot and driveway improvements	1450		30,000				
Lapham Pk/Scat Sites WI002000005P	Parking structure/lot and driveway improvements	1450		30,000				

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Milwaukee		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:			Federal FY of Grant: 2009			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Lincoln Ct WI002000019P	Parking lot and driveway improvements	1450		30,000				
Locust Ct WI002000015P	Parking lot and driveway improvements	1450		30,000				
Merrill Park WI002000091P	Parking lot and driveway improvements	1450		30,000				
Mitchell Court WI002000017P	Parking lot and driveway improvements	1450		30,000				
Riverview WI002000062P	Parking lot and driveway improvements	1450		30,000				
Arlington Court WI002000013P	Window and window hardware	1460		75,000				
Becher Court WI002000018P	Window and window hardware	1460		50,000				
College Court WI002000011P	Window and window hardware	1460		75,000				
Hillside Terrace and Addition WI002000001P	Window and window hardware	1460		50,000				
Holton Tr/Scat Sites WI002000008P	Window and window hardware	1460		50,000				
Lapham Park/Scattered Sites WI002000005P	Window and window hardware	1460		50,000				
Lincoln Court WI002000019P	Window and window hardware	1460		50,000				
Locust Court WI002000015P	Window and window hardware	1460		75,000				
Merrill Park WI002000091P	Window and window hardware	1460		50,000				
Mitchell Court WI002000017P	Window and window hardware	1460		50,000				
Riverview WI002000062P	Window and window hardware	1460		75,000				
Scattered Sites WI002000010P	Rehabilitate scattered site units	1460		10,000				
PHA-Wide	Mitigation of environment hazards	1460		300,000				
PHA-Wide	ADA/504 Accommodations	1460		50,000				
Arlington Court WI002000013P	Trash compactor improvements	1465 .1		36,250				
Becher Court WI002000018P	Trash compactor improvements	1465 .1		25,000				
College Court WI002000011P	Trash compactor improvements	1465 .1		36,250				
Hillside Terrace WI002000001P	Trash compactor improvements	1465 .1		25,000				

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Milwaukee			Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:			Federal FY of Grant: 2009		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Holton Tr/Scat Sites WI002000008P	Trash compactor improvements	1465 .1		25,000				
Lapham Pk/Scat Sites WI002000005P	Trash compactor improvements	1465 .1		25,000				
Lincoln Ct WI002000019P	Trash compactor improvements	1465 .1		25,000				
Locust Ct WI002000015P	Trash compactor improvements	1465 .1		36,250				
Merrill Park WI002000091P	Trash compactor improvements	1465 .1		25,000				
Mitchell Court WI002000017P	Trash compactor improvements	1465 .1		25,000				
Riverview WI002000062P	Trash compactor improvements	1465 .1		36,250				
Non-dwelling equipment Authority-wide	Community space furnishings	1475		80,000				
Becher Court WI002000018P	Demolition to support the revitalization of Becher Court	1485		45,000				
Scattered Sites WI002000010P	Demolition to support the revitalization of Scattered Sites	1485		45,000				
Relocation Costs		1495 .1		50,000				
Development	New development of mixed-income/mixed finance housing	1499		100,000				
Collateralization or Debt Service	Issuance of a bond to support the activities listed on pages 8-9	1501		750,000				
Contingency		1502		49,838				

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages								
PHA Name: Housing Authority of the City of Milwaukee		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:				Federal FY of Grant: 2009		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Parklawn WI002000007P	Replace roof at YMCA and manager office	1450		500,000				
	Replace roof at 5011 W. Lisbon Ave.	1450		500,000				
Hillside Terrace WI002000001P/ WI002000004P	Replace roof at the Resource Center	1450		500,000				
PHA Wide	Upgrade card access system and cameras	1460		2,500,000				
PHA Wide	Exterior building repairs	1460		6,000,000				
Lincoln Court WI0020000019P	First floor expansion	1460		1,750,000				
Mitchell Court WI0020000017P	First floor expansion	1460		1,750,000				
Lapham Park WI002000005P	Replace windows on highrise building	1460		500,000				
Westlawn WI002000002P	Electrical upgrade	1460		3,000,000				
Westlawn WI002000002P	Revitalization of Westlawn	1460		4,000,000				
PHA-Wide	Compactor Replacement	1460		500,000				
Scattered Sites WI0020000010P	Revitalization of Scattered Sites	1460		3,000,000				

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part III: Implementation Schedule							
PHA Name: Housing Authority of the City of Milwaukee			Grant Type and Number Capital Fund Program No: Replacement Housing Factor No:			Federal FY of Grant: 2009	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
Arlington Court WI002000013P	9/15/2011			9/15/2013			
Becher Court WI002000018P	9/15/2011			9/15/2013			
College Court WI002000011P	9/15/2011			9/15/2013			
Hillside Terrace and Addition WI002000001P/ WI002000004P	9/15/2011			9/15/2013			
Holton Terrace/Scat Sites WI002000008P	9/15/2011			9/15/2013			
Lapham Park/ Scattered Sites WI002000005P	9/15/2011			9/15/2013			
Lincoln Court WI002000019P	9/15/2011			9/15/2013			
Locust Court WI002000015P	9/15/2011			9/15/2013			
Merrill Park WI0020000091P	9/15/2011			9/15/2013			
Mitchell Park WI002000017P	9/15/2011			9/15/2013			
Riverview WI002000062P	9/15/2011			9/15/2013			
Scattered Sites WI002000010P	9/15/2011			9/15/2013			
PHA-Wide							

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name: Housing Authority of the City of Milwaukee				<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY: 2010	Work Statement for Year 3 FFY Grant: PHA FY: 2011	Work Statement for Year 4 FFY Grant: PHA FY: 2012	Work Statement for Year 5 FFY Grant: PHA FY: 2013
	Annual Statement				
College Court WI002000011P			2,500 2,500	100,000	
Hillside Terrace and Addition WI002000001P			2,500 100,000 2,500 2,500	100,000 10,000 10,000	

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name: Housing Authority of the City of Milwaukee			<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:		
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY: 2010	Work Statement for Year 3 FFY Grant: PHA FY: 2011	Work Statement for Year 4 FFY Grant: PHA FY: 2012	Work Statement for Year 5 FFY Grant: PHA FY: 2013
	Annual Statement				
Lincoln Court WI002000019P			2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 100,000 2,500 2,500	100,000	
Locust Court WI002000015P			2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 2,500 25,000 2,500	100,000	
Merrill Park WI002000091P			2,500 2,500	100,000	

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name: Housing Authority of the City of Milwaukee			<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:		
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY: 2010	Work Statement for Year 3 FFY Grant: PHA FY: 2011	Work Statement for Year 4 FFY Grant: PHA FY: 2012	Work Statement for Year 5 FFY Grant: PHA FY: 2013
	Annual Statement				
Mitchell Court WI002000017P			2,500 100,000	100,000	
Parklawn WI002000007P			2,500 2,500	5,000 10,000 10,000 10,000	
Riverview WI002000062P			2,500 2,500	100,000	
Scattered Sites Demolition WI002000010P			100,000		

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name: Housing Authority of the City of Milwaukee			<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:		
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY: 2010	Work Statement for Year 3 FFY Grant: PHA FY: 2011	Work Statement for Year 4 FFY Grant: PHA FY: 2012	Work Statement for Year 5 FFY Grant: PHA FY: 2013
	Annual Statement				
Scattered Sites North&West WI002000016P			2,500 2,500	10,000	
Scattered Sites South WI002000061P			2,500 2,500	10,000	
Westlawn WI002000002P		300,000 1,000,000	2,500 2,500	5,000 10,000	300,000 1,000,000

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name: Housing Authority of the City of Milwaukee			<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:		
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY: 2010	Work Statement for Year 3 FFY Grant: PHA FY: 2011	Work Statement for Year 4 FFY Grant: PHA FY: 2012	Work Statement for Year 5 FFY Grant: PHA FY: 2013
	Annual Statement				
Non-dwelling Structures		10,000	10,000	10,000	10,000
Development Activities		279,273	279,273	279,273	279,273
Central Support/Community Service WI002009999P				10,000 100,000	
PHA-Wide Relocation Costs		100,000	100,000	100,000	100,000
PHA-Wide Mitigation of Environmental Hazards		300,000	300,000	300,000	300,000
PHA-Wide ADA/504 Accommodations		50,000	50,000	50,000	50,000
Operations		1,374,100	1,374,100	1,374,100	1,374,100
Management Improvements		1,374,100	1,374,100	1,374,100	1,374,100
Administration		122,000	122,000	122,000	122,000
Audit		10,000	10,000	10,000	10,000
Fees & Costs (M&D)		800,000	800,000	800,000	800,000
Collateralization or Debt Service		1,350,000	1,350,000	1,350,000	1,350,000
Contingency		90,303	77,803	90,303	90,303
TOTAL Estimated CFP		7,159,776	7,159,776	7,159,776	7,159,776

Capital Fund Program Five-Year Action Plan		
Part II: Supporting Pages—Work Activities		
Activities for Year 1	Activities for Year : 2010 FFY Grant: PHA FY:	Activities for Year: 2011 FFY Grant: PHA FY:

Capital Fund Program Five-Year Action Plan Part II: Supporting Pages—Work Activities						
Activities for Year 1	Activities for Year : 2010 FFY Grant: PHA FY:			Activities for Year: 2011 FFY Grant: PHA FY:		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement						
	Collateralization or Debt Service		1,350,00	Collateralization or Debt Service		1,350,000
	Contingency		90,303	Contingency		77,803
Total CFP Estimated Cost			7,159,776			7,159,776

Capital Fund Program Five-Year Action Plan Part II: Supporting Pages—Work Activities						
Activities for Year 1	Activities for Year : 2012 FFY Grant: PHA FY:			Activities for Year: 2013 FFY Grant: PHA FY:		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement						
	Arlington Court WI002000013P	camera surveillance, card access, security system hardware	100,000	Arlington Court WI002000013P		0
	Becher Court and Addition WI002000018P	camera surveillance, card access, security system hardware	100,000	Becher Court and Addition WI002000018P		0
	College Court WI002000011P	fire alarm/help call system improvements	100,000	College Court WI002000011P		0
	Hillside Terrace and Addition WI002000001P	camera surveillance, card access, security system hardware Family Resource Center improvements Mgt office/maint facility improvements	100,000 10,000 10,000	Hillside Terrace and Addition WI002000001P		0
	Holton Terrace/ Scattered Sites WI002000008P	camera surveillance, card access, security system hardware	100,000	Holton Terrace/ Scattered Sites WI002000008P		0
	Lapham Park/ Scattered Sites WI002000005P	camera surveillance, card access, security system hardware	100,000	Lapham Park/ Scattered Sites WI002000005P		0
	Lincoln Court WI002000019P	camera surveillance, card access, security system hardware	100,000	Lincoln Court WI002000019P		0
	Locust Court WI002000015P	camera surveillance, card access, security system hardware	100,000	Locust Court WI002000015P		0
	Merrill Park WI002000091P	camera surveillance, card access, security system hardware	100,000	Merrill Park WI002000091P		0
	Mitchell Court WI002000017P	camera surveillance, card access, security system hardware	100,000	Mitchell Court WI002000017P		0

Capital Fund Program Five-Year Action Plan Part II: Supporting Pages—Work Activities						
Activities for Year 1	Activities for Year : 2012 FFY Grant: PHA FY:			Activities for Year: 2013 FFY Grant: PHA FY:		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement						
	Parklawn WI002000007P	camera surveillance, card access, security system hardware YMCA improvements Community Building improvements Mgt office/maint facility improvements	5,000 10,000 10,000	Parklawn WI002000007P		0
	Riverview WI002000062P	camera surveillance, card access, security system hardware	100,000	Riverview WI002000062P		0
	Scattered Sites Demolition WI002000010P		0	Scattered Sites Demolition WI002000010P		0
	Scattered Sites North & West WI002000016P	Camera surveillance, card access, security system hardware	10,000	Scattered Sites North & West WI002000016P		0
	Scattered Sites South WI002000061P	Camera surveillance, card access, security system hardware	10,000	Scattered Sites South WI002000061P		0
	Westlawn WI002000002P	Camera surveillance, card access, security system hardware Mgt office/maint facility improvements	5,000 10,000	Westlawn WI002000002P	Site improvements Replace existing canopies, front stoops, front walks	300,000 1,000,000
	Non-Dwelling Structures		10,000	Non-Dwelling Structures		10,000
	Development Activities		279,273	Development Activities		279,273
	Central Support/Community Service WI002009999P		10,000 100,000	Central Support/Community Service WI002009999P		0
	PHA-Wide Relocation Costs		100,000	PHA-Wide Relocation Costs		100,000
	PHA-Wide Mitigation of Environmental Hazards		300,000	PHA-Wide Mitigation of Environmental Hazards		300,000
	PHA-Wide ADA/504 Accommodations		50,000	PHA-Wide ADA/504 Accommodations		50,000
	Operations		1,374,100	Operations		1,374,100
	Management Improvements		1,374,100	Management Improvements		1,374,100
	Administration		122,000	Administration		122,000
	Audit		10,000	Audit		10,000
	Fees& Costs (M&D)		800,000	Fees& Costs (M&D)		800,000
	Collateralization or Debt Service		1,350,000	Collateralization or Debt Service		1,350,000
	Contingency		90,303	Contingency		90,303
TOTAL Estimated CFP Costs			7,159,776			7,159,776

LEAD-BASED PAINT

91.215(g)

38) Estimate the number of housing units* that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families. *If using the CPMP Tool, this number can be provided on the Housing Needs Table in the Needs.xls file.

See Housing Needs Table in the Needs.xls file in the CPMP Tool.

39) Describe the jurisdiction's plan to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Estimate of Number of Housing units containing Lead-Based Paint

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

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

In 2008, approximately 4.6% of children tested in Milwaukee for lead exposure were identified as lead poisoned. Although great strides have been made in reducing the prevalence rate, the current scope of the problem is approximately 4 times greater than the national average of 1.2%. Milwaukee's Lead Program Target Areas' report cites prevalence rates at 9.3% which reflects the racial disparities that exist in this health problem.

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

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

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

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

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

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

Implementation Strategy:

- 1) Compliance with the Lead Safe Housing Rule. Produce 5,000 lead safe housing units within the high risk target areas, of which 600 are CDBG federally-funded.
- 2) Provide partial grant subsidies to assure the remediation of lead-based paint hazards at high risk window components for housing units previously scheduled for condemnation and currently undergoing intensive housing rehabilitation.
- 3) Provide Section 8 landlords and Milwaukee residents that purchase foreclosed properties partial subsidies for Lead Hazard Control.
- 4) The MHD and the Department of Neighborhood Services (DNS) – Residential Code Compliance will work in tandem with community-based agencies to assure lead-safe and habitable housing within Milwaukee’s target areas.
- 5) DNS will include the MHD CLPPP information in landlord training classes that are offered in both English and Spanish.
- 6) MHD CLPPP will provide lead hazard control for properties with asthmatic children identified in Milwaukee’s Healthy Homes Demonstration Project.
- 7) MHD will provide risk assessments for property owners participating in the Neighborhood Service Program (NSP).
- 8) Involve community members most affected by the problem in neighborhood based strategies.
- 9) Increase lead testing of children covered by Medicaid.
- 10) Diversify and increase funding to make homes lead-safe before a child is poisoned.

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

BARRIERS TO AFFORDABLE HOUSING & FAIR HOUSING

91.210 (e) & 91.215(h)

40) Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

41) Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

42) The jurisdiction must certify that it has completed an analysis of impediments to fair housing choice, and that it is taking appropriate actions to overcome the effects of any impediments identified through that analysis, and that it maintains records reflecting the analysis and actions in this regard. The jurisdiction is not required to submit the analysis as part of the consolidated plan.

Response to 40, 41, 42:

Affirmatively Furthering Fair Housing

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

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

Summary of Impediments:

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

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

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

Utilization of Strengthened Fair Housing Ordinance

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

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

City of Milwaukee – Equal Rights Commission

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

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

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

The City has also discussed with the Metropolitan Milwaukee Fair Housing Council (MMFHC) a formal referral process for housing discrimination complaints which is anticipated to begin sometime in 2009. In the meantime, MMFHC will provide training to City employees about housing discrimination law.

Annual Review of Lending Practices by City Comptroller

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

FAIR HOUSING PROGRAMS

City Subcontracts with Fair Housing Programs

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

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

- **MMFHC's Counseling and Investigative Services** will investigate fair housing complaints to uncover insidious forms of systemic discrimination in the housing industry. MMFHC will conduct tests in the rental, sales, insurance and lending industries throughout its service area.
- **MMFHC's Education and Outreach Program** will inform home-seekers and housing providers about fair housing rights and responsibilities to ensure compliance with fair housing laws. Fair housing and fair lending presentations will be conducted to civic, business, educational, neighborhood, religious and housing industry groups.
- **MMFHC's Fair Housing Training Services** will assist housing professionals in the real estate, insurance and mortgage lending industries and provide contractual fair housing training. MMFHC will conduct specialized seminars on fair housing issues for a variety of groups. These seminars provide in-depth information on fair housing and fair lending laws, procedures and other related issues.
- **MMFHC's Community Economic Development (CED) Program** will address fair lending issues in a variety of ways. CED staff will respond to calls from a predatory lending hotline and investigate fair lending allegations. After investigating the loan and discussing options with the client, where appropriate, cases will be referred to Legal Aid, other attorneys and/or lenders and housing counseling agencies. Also, when appropriate, CED will assist clients to restructure existing loans or to find other, more appropriately priced loans, sometimes helping clients apply for refinancing through the rescue fund operated by the National Community Reinvestment Coalition (NCRC). CED will also assist consumers file complaints with the Wisconsin Department of Financial Institutions.
- CED will also generate television, radio and print coverage on predatory lending as part of its' outreach and education. CED staff will disseminate informational brochures on predatory lending in English and Spanish and give educational presentations to church groups, neighborhood associations, civic organizations, social service groups, elected officials and affordable housing professionals. CED staff will help plan and implement workshops designed for people considering refinancing or home equity loans, including workshops at the Money Conference and other neighborhood or community-based events.

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

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

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

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

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

Section 504 of the Rehabilitation Act of 1973

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

SECTION 8 – Rent Assistance Program

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

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

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

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

MONITORING

91.230

43) Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Monitoring response:

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

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

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

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

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

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

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

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

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

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

Performance – Based Measurement System for funded Activities

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

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

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

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

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

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

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

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

Components of CDGA's Performance Measurement System:

Activity Workplan Components

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

Outcome Measurement Workplan Components

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

COMMUNITY DEVELOPMENT NEEDS

91.215 (e)

44) Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table* – i.e., public facilities, public improvements, public services and economic development.

Besides the narrative below, see also Community Development Needs Table* located in the CPMP Tool.

45) Describe the basis for assigning the priority given to each category of priority needs provided on Table 2B or the Community Development Table in the CPMP Tool's Needs.xls worksheet.

46) Identify any obstacles to meeting underserved needs.

PRIORITY NEEDS - ECONOMIC DEVELOPMENT AND JOBS

Unemployment Issues

From 1963 to 2001, the City of Milwaukee lost nearly 83,000 manufacturing jobs while the suburbs gained more than 30,000 (*U.S. Census Bureau 2000*).

According to data from the U.S. Bureau of Labor Statistics, employment in the City of Milwaukee decreased by 15,140 during March 2009. Only three cities suffered larger employment decreases than Milwaukee between March 2008-March 2009: Atlanta, Detroit and Charlotte. In addition, Milwaukee ranks next to last in employment performance in the past year. The City's unemployment rate increased from 6.3% in March 2008 to 11% in March 2009; Milwaukee registered the 42nd highest unemployment rate out of the nation's 50 largest cities. (*UWM-Center for Economic Development-monthly employment watch-March 2009*)

A report by the *University of Wisconsin-Milwaukee Employment and Training Institute, June 2005*, explores various issues impacting employment for City residents:

- Only 8% of the full-time entry level jobs available in the metro area for workers with a high school education and not requiring specific training were located in the CDBG target area. For part-time jobs, only 4% were in the CDBG target areas.
- There is a shortage of full-time entry level jobs in the CDBG target areas. More readily available jobs are located in outlying areas and are difficult to access due to transportation issues and lack of a valid driver's license.
- Most of the entry level jobs available for persons with a high school education and not requiring specific training were part-time.
- Most of the higher skilled full-time jobs were located outside the City of Milwaukee.
- Job seekers outnumber full-time openings by a gap of seven to one and only a third of unemployed job seekers have a valid driver's license.
- Annual employer surveys conducted by the Employment and Training Institute for the Private Industry Council of Milwaukee County have found that three-fourths of Milwaukee area job openings are located in Milwaukee County suburbs and the counties of Waukesha, Ozaukee, and Washington counties – usually not easily accessed by public transportation.
- Minorities and poor populations are the most likely to have drivers license problems. Less than half (47 percent) of Milwaukee County African American adults and 43 percent of Hispanic adults have a valid drivers license compared to 85 percent of white adults in the remainder of the State.

- For young adults ages 18-24, only 26 percent of African Americans and 34 percent of Hispanics in Milwaukee County possess a valid license, compared to 71 percent of young white adults in the remainder of the State.
- A large number of licensed drivers have had their licenses suspended or revoked, many for failure to pay fines and forfeitures rather than traffic points violations. The State of Wisconsin's drivers license file shows 39,685 individuals in Milwaukee County who have drivers licenses but also recent suspensions or revocations on their licenses. Another 49,804 Milwaukee County adults had a recent suspension/revocation but no license with the Department of Transportation(DOT). Only 65 percent of adults in Milwaukee County have a current and valid Wisconsin drivers license, compared to 83 percent of adults in the remainder of the State.
- Minorities are most likely to have driver's license problems related to fine collections. Those who continue to drive to work with suspended licenses often are stopped for minor vehicle ("driving while poor") or traffic infractions only to be cited for driving under suspension or revocation.

Beginning in 2007, CDGA provided partial funding to the pilot Center for Driver's License Recovery and Employability (CDLRE) program, to increase the number of licensed drivers among Milwaukee's low income populations. With an emphasis on personal responsibility, this program provides assistance to residents aged 18 and above, with suspended and revoked driver's licenses, incomes at 200% of poverty or below and having no pending Operating While Intoxicated (OWI) offenses.

An evaluation report by the Employment and Training Institute found the following:

"Second Year Evaluation of the Center for Driver's License & Recovery and Employability (2008) tracked earnings of clients completing case management services in 2007 and found early gains of \$759 per quarter (\$253 a month) for women obtaining their driving privileges. Women successfully obtaining their driving privileges showed a 64% increase in earnings in First Quarter 2008 (compared to First Quarter 2007), while women not obtaining their driving privileges showed only 4% gains. Improvements were also seen in the unemployment rate among successful male participants in the program, (dropping from 58% to 54%) and in the percentages of men earning at least full-time minimum wages. However, men's history of prior state incarceration was a stronger predictor of their First Quarter 2008 earnings than either their level of schooling or driver's license attainment. Over a fourth of male clients served by the CDLRE had records of incarceration in state correctional facilities, and 58% of these men obtained their driving privileges."

Households Without a Vehicle

According to Census 2000 special tabulation files for the PUMS (*Public Use Microdata Sample*), Statewide, a total of 371,501 persons, aged 18 and over, were reported in households with 0 vehicles (cars or trucks). These persons were heavily concentrated in the City of Milwaukee, where 87,300 adults were in households without vehicles. While the City of Milwaukee has 11 percent of the state's adult population, it has 23 percent of the adults living in households without a vehicle.

Ex-Offenders and Parolees

One of the most difficult populations to serve is ex-offenders who, once released, have difficulty obtaining employment and higher education, have high recidivism rates and driver's license suspension and revocation problems. Approximately 26,772 adults have been released from Wisconsin correctional facilities since 1993 and a large percentage are likely to be currently living in Milwaukee County.

Employment patterns in the construction sector and construction trades in the City of Milwaukee (University of Wisconsin Employment & Training Institute 2006):

- Employment of African Americans in the major construction trades (i.e., electricians, carpenters, plumbers, brickmasons) have shown little if any improvement while Hispanics have shown notable increases in two of these four top construction trades.
- Very few African Americans have access to construction jobs outside of the City of Milwaukee, while large numbers of white construction workers are employed at worksites throughout the metro area. Analysis of the top ten construction industry sites in the metro area showed very different participation rates for minorities by geography. The four largest construction industry jobsites in Milwaukee (the Menomonee Valley, far northwest side, City Hall area, and Third Ward area) showed 17% to 21% employment of minorities, while the six largest jobsites in Waukesha County (in Pewaukee, New Berlin, Waukesha, Menomonee Falls, and Brookfield) showed only 2% to 9% employment of minorities.
- Minorities were most likely to be employed as construction laborers and helpers, where they made up 25% of the workforce in 2000. In the Milwaukee MSA, only 12% of skilled construction workers (e.g., carpenters, electricians, plumbers, sheet metal workers, etc.) were minorities.
- While the African American workforce has increased 43% in the last two decades to a total of 90,243 workers in 2000, African American employment in major construction trades has shown little change and in some cases has worsened in the Milwaukee MSA.
- The Hispanic workforce has increased 156% from 1980 to 2000, for a total of 39,442 Hispanic workers in the Milwaukee Metropolitan Statistical Area(MSA). Employment in the construction trades has also increased in some trades while showing no improvement in others.
- Although African Americans made up 30 percent of the City of Milwaukee's workforce (and 34% of the City's adult working-age population), African Americans held only 8% of the 11,370 jobs at construction industry worksites located within the City of Milwaukee, with the lowest rates in Waukesha, Ozaukee and Washington counties, where they held less than 1% of the 19,903 jobs estimated at construction industry worksites, at the time of the 2000 Census.
- Hispanics were employed at their highest levels in the Menomonee Valley (where they held 9.9% of the 1,160 jobs at construction industry worksites) and on the City's southside (where they held 7.8% of the 2,446 jobs at construction firms' worksites).
- Asian workforce in metro Milwaukee rose from 3,892 in 1980 to 13,092 two decades later, and the Native American workforce showed growth as well.

Racial Inequality. Milwaukee "leads" the Frostbelt in racial inequality and measures of economic distress in the black community. (*The Economic State of Milwaukee, The University of Wisconsin-Milwaukee Center for Economic Development (UWMCED), 2002*).

- In 2000, real median family income for whites in metro Milwaukee was \$48,258; for Blacks it was \$25,728; for American Indian & Alaskan Natives it was \$32,083; for Asians it was \$39,463 and for Hispanics it was \$30,403. (*U.S. Census Bureau 2000*).
- In 2000, the black poverty rate in the city of Milwaukee reached 33.3%, higher than the national average of 24.9%, the highest rate among the Frostbelt cities.
- According to the University of Wisconsin-Center for Economic Development (2007), the unemployment rate in metropolitan Milwaukee for black men, ages 16-64, was 46.8% compared to 17.9% of white men in that same age range.

- Metropolitan Milwaukee had the largest gap in the Frostbelt between blacks and whites in 2000 in the rate of college-educated in the adult population. The number of blacks as a percentage of all blacks 25 and older with a college degree was 9.1%.
- Milwaukee ranked 48th of the largest 50 metro areas in the percentage of black representation in management occupations. Of 36,579 private sector managers at large Milwaukee firms in 1999, 1,608 or 4.4% were Black. (*UWM-Center for Economic Development; The Two Milwaukees: Separate and Unequal, 2003*)

City-Suburban Disparities. Like all Frostbelt metropolitan areas, Milwaukee's economic history since 1970 is "a tale of two economies:" a central city economy, with many troubling indicators, and a generally prospering suburban economy. The disparity between city and suburban economic fortunes is particularly sharp because, at the same time that the city of Milwaukee has ranked rather low compared to other Frostbelt cities, suburban Milwaukee has ranked high in comparison to its Frostbelt counterparts (*The Economic State of Milwaukee, The University of Wisconsin-Milwaukee Center for Economic Development (UWMCED), 2002*).

Specific Community Development Objectives

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

Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.

See Summaries.xls worksheets located in the CPMP Tool.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

The jurisdiction may satisfy this requirement by using Table 3C or, if using the CPMP Tool, the Projects.xls worksheets.

See Projects.xls worksheets located in the CPMP Tool.

ECONOMIC AND COMMUNITY DEVELOPMENT STRATEGY

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

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

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

The following represents the draft framework for the City's economic development policy plan. In the next couple of months, this framework will be expanded into a much more comprehensive document that recommends certain economic development policy and program approaches. Before the end of 2009, it will be brought to the Milwaukee Common Council for adoption as part of the City's "Smart Growth" comprehensive plan.

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

Policy Theme: Align City government’s economic development efforts...

<p>... with the efforts of others pursuing economic and employment growth in Milwaukee and the region.</p>	<p>... with the needs of local employers.</p>
<p>1) Work with regional partners to promote and grow the strengths of Milwaukee’s economy.</p>	<p>1) Actively seek input from local employers in the formation of economic development programs and policy.</p>
<p>2) Encourage and support inter-governmental cooperation on economic development activities and issues.</p>	<p>2) Recognize that existing employers are the base of successful economic development efforts, and make existing employers the city’s top priority.</p> <p>3) Support changes at the Milwaukee Area Workforce Investment Board that make the agency more responsive to the training needs of local employers.</p>

Policy Theme: Target City government’s economic development resources...

<p>...to employers and sectors poised for growth in the Milwaukee region.</p>	<p>...so Milwaukee residents benefit from the growth of economic opportunity.</p>
<p>1) Assemble a business development team within City government poised to identify and take advantage of opportunities for job growth.</p>	<p>1) Invest in the human and physical assets of the central city to create opportunities for employers in neighborhoods where residents are most in need of employment.</p>
<p>2) Engage in and support activities that grow the entrepreneurial culture in Milwaukee.</p>	<p>2) Position public investment in economic development to promote the retention and growth of living-wage jobs for Milwaukee residents.</p> <p>3) Strengthen the economies of communities in need, using approaches such as the Main Street program and Business Improvement Districts.</p> <p>4) Support high-quality public transportation networks that connect residents to job opportunities.</p> <p>5) Encourage the notion of “shared prosperity.”</p> <p>6) Promote and enforce measures that require resident hiring and use of emerging business enterprises for publicly-funded investments.</p>

Policy Theme: Grow the workforce employers need...

...by encouraging Milwaukeeans to finish high school and pursue post-secondary education.	...by providing robust training resources to the citizens of Milwaukee.	...by making Milwaukee attractive to talent from elsewhere.
1) Identify industry champions to promote the need for all types of skilled labor in Milwaukee – both blue and white collar.	1) Position the Milwaukee Area Workforce Investment Board to maximize federal resources available for job training.	1) Invest in quality of life measures that make our neighborhoods more attractive.
2) Support youth employment activities that provide work experiences for teenagers, particularly those in neighborhoods with high unemployment.	2) Support the growth of Milwaukee's institutions of higher learning, both public and private, both academic and technical, particularly in locations that are accessible to city residents.	2) Invest in public transportation assets.
3) Encourage the growth of internship partnerships between local higher-education institutions and local employers.	3) Insist on adherence to best practices among agencies funded to provide work-readiness training to young people.	3) Support efforts that promote Milwaukee's assets to regional and national audiences.
4) Encourage Milwaukee Public Schools to build on its most successful programs, such as Project Lead the Way		4) Support activities of FUEL Milwaukee.
		5) Position Milwaukee as a "green" city that values and supports environmental sustainability.

Policy Theme: Operate City government in a manner that supports economic development....

...by reducing crime.	...by providing a high-quality physical infrastructure and top-notch local government services.	...by ensuring a consistent, understandable and predictable regulatory framework.
1) Maintain a strong, effective police force.	1) Fund a reasonable street repair and replacement cycle.	1) Balance the desire to regulate with the desire to encourage employment and business growth.
2) Support community-based activities that reduce crime, such as after-school and youth diversion programs, block watches, and prompt graffiti removal.	2) Maintain Milwaukee's reputation for clean, abundant drinking water available at a fair price.	2) Use City government web site to make regulations, application forms, and information easily available over the Internet.
	3) Investigate and implement technology approaches to improve local government efficiency and service quality.	3) Reward City employees who suggest ways to streamline and simplify regulations.
	4) Support the operation of a modern port.	
	5) Support the growth of pedestrian traffic in commercial districts through measures such as streetscaping.	
	6) Encourage high-quality design in the public realm.	

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

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

Implementation Strategy:

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

The City will also utilize the following City-funded programs to help foster business development /retention and job creation/retention:

Major Economic Development Programs

- Land Bank Program
- Industrial Revenue Bonding Program
- Various Federal and State Tax Credits
- New Market, Job Creation & Technology Zone Tax Credits
- Environmental Assessments & Brownfields
- Job Opportunity Bond Fund
- Capital Access Program
- Mentor Access Program
- Customized Labor Training Grants
- Tax Incremental Financing Districts
- Business Planning Assistance
- Business Development Marketing Program

Neighborhood Economic Development Programs

- Neighborhood Commercial Revitalization
- Business Improvement Districts
- Milwaukee Mainstreet Districts(*partially funded by CDBG funds*)
- Business Façade Grants
- Neighborhood Capital Improvements Partnership Program
- Retail Investment Fund(*partially funded by CDBG funds*)
- Small Business Predevelopment Fund
- Development Zones
- Other Special Initiatives

**SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS
ECONOMIC DEVELOPMENT**

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	2-5 yr benchmarks	FY 2010 benchmarks
Economic Development-Direct financial and/or technical assistance to for profits	Provide technical or financial assistance to businesses	Expand economic opportunities	Sustainability	#new businesses and new jobs created for low income persons	400	80
Retail Investment Fund	Provide grants or loans to businesses to create jobs	Expand economic opportunities	Sustainability	#new businesses and jobs created for low income persons	75	15
Milwaukee Mainstreet Program	Provide technical or financial assistance to businesses	Expand economic opportunities	Sustainability	#new businesses and jobs created for low income persons	150	30
Large Impact Developments	Provide grants to businesses to create jobs	Expand economic opportunities	Sustainability	#new jobs created for low income persons	50	10
Emerging Business Enterprise Program	Provide assistance/City certification to businesses to created jobs	Expand economic opportunities	Sustainability	#new businesses certified and new jobs created for low income persons	50	10

Issues Facing Youth in Milwaukee

Overview

Milwaukee youth live in an environment that can be extremely challenging and dangerous. At the same time, the majority of young people live in families where their parents are trying their best to provide them with a safe, stable, and supportive living environment, encourage their success in school and protect them from negative influences and risky behavior. Youth development programs which focus on building assets rather than treating deficits are generally more successful in the long run.

General Indicators of Youth Well-Being

- *Juvenile Delinquency:* Between 2002 and 2008, the number of referrals to Milwaukee County Children's Court dropped 29% from 4,847 to 3,425. The number of youth committed to juvenile corrections also dropped 29% from 300 in 2002 to 214 in 2008.¹
- *Child Abuse and Neglect:* The number of substantiated maltreatment cases dropped 23% between 2002 and 2007 (the last year for which data are currently available), from 2,188 cases to 1,692.²
- *Births to Teen Mothers:* Births to teen mothers dropped 10% between 2001 and 2007 from 2,326 to 2,085 although there is some indication that, after several years of decline, births to teen parents are again increasing.³
- *Education:* The number of students dropped out of the Milwaukee Public Schools has decreased 10% between the 2000-01 and 2007-08 school years, from 3,038 to 2,376.⁴ At the same time, the high school graduation rate for 2005-06 was 78.8% which was significantly lower than the statewide graduation rate of 89.3%.⁵
- *Poverty:* In 2006, 27.7% of children in Milwaukee County lived in families with incomes below the poverty level, up from 23.7% just six years prior in 2000.⁶ Rising unemployment will increase the number of children living in poverty.
- *Homelessness:* An estimated 2,400 Milwaukee Public Schools students are homeless on an annual basis. The Milwaukee Continuum of Care Shelter System counted 1,282 children who had lived in emergency shelters at some point during 2008.⁷

Habitual truants are defined by Wisconsin State Statute as youth who are absent without excuse 5 or more days in a semester. In Milwaukee the percentage of elementary school students who are habitually truant remained about the same at 32%. However, the percentage rose for middle and high school students: from 42 to 45% for middle school students and from 73 to 76% for high school students.

Another significant issue which hinders educational success is student mobility. This the percentage of students who change schools during the school year, primarily due to one or more changes in residence. Overall, 15% of Milwaukee Public School students change schools during the school year. But in 15 high schools the mobility rates were over 20%, making it very difficult for students to stay current with studies and for teachers to work with an ever changing classroom of students.

¹ Milwaukee County Delinquency and Court Services, May 2009.

² Wisconsin Department of Children and Families, Child Abuse and Neglect Reports, 2002-2007

³ Wisconsin Department of Health Services, Vital Statistics

⁴ Wisconsin Department of Public Instruction

⁵ WisKids Count 2007, Wisconsin Council on Children and Families

⁶ Ibid

⁷ Milwaukee Continuum of Care, Homeless Management Information System

Other Specific Youth Issues

The following information is taken from the results of the 2007 Milwaukee Brighter Futures Youth Survey which included 439 youth, ages 12-17, who represented all segments of the community in terms of gender, age, grade in school, and ethnicity/race.

Key result from the 2007 Milwaukee Brighter Futures Youth Survey⁸	Percent
Violence/Danger	
Youth who rode in a car with someone who had been drinking 1+ times in past 30 days	35%
Youth who carried a weapon such as a gun, knife or club 1+ times in the past 30 days	21%
Youth who were in 1+ physical fights in past 12 months	58%
Youth who had been hit, slapped or physically hurt by a boyfriend or girlfriend in past 12 months	14%
Youth who said they felt safe in their neighborhood	15%
Alcohol and Other Drug Use	
Youth who had alcohol 1+ times in the past 30 days	30%
Youth who used marijuana 1+ times in the past 30 days	25%
Youth who said it was very easy or fairly easy to obtain alcohol	59%
Youth who said it was very easy or fairly easy to obtain marijuana	64%
Sexual Behavior	
Youth who have had sexual intercourse	59%
Youth who have had two or more sexual partners	45%
Youth who used a condom the last time they had sexual intercourse	68%
Youth who had been pregnant or had gotten someone pregnant	13%
Youth Beliefs and Behavior	
Youth who agree that they "can resist negative peer pressure and dangerous situations"	74%
Youth whose parents ask where they are going and with whom they will be all or most of the time	80%
Youth who talk to parents or trusted adult when they have a problem	20%

Key issues that are evident from the survey data include:

- High incidence of involvement in physical violence including fighting and weapon carrying which strongly suggests that youth are frequently in situations where they feel unsafe. Feeling vulnerable to violence and concerns about having participated in or been witness to violence are concerns that are frequently expressed by youth.
- Ready access to alcohol and marijuana through older siblings, other family members, friends, and sales from retail outlets (in the case of alcohol). Although 30-day use is not significantly higher than in the rest of the state, the fact that one-third of youth have used either alcohol and/or marijuana in the past 30 days is cause for concern.
- High rates of sexual activity among youth including a significant percentage who have had sexual intercourse with two or more partners. This is an area of concern both with regard to teen pregnancy and the incidence of sexually transmitted diseases.

⁸ Brighter Futures Youth Survey, 2007

Youth Crime and Violence – Impact on Economic Development & Neighborhood Revitalization

Youth involvement with crime, violence and gangs remains a very significant set of problems for Milwaukee.

Juvenile arrest data compiled by the University of Wisconsin-Milwaukee's Center for Urban Initiatives and Research provides a picture of trends in juvenile crime from 2005-2007. The following categories saw increases of 30% or higher:

Robbery	48.1%
Aggravated assault	45.3%
Weapons violations	36.8%
Arson	35.3%
Burglary	35.0%
Crimes against persons	33.9%
Disorderly conduct	32.1%

All of these types of crime are damaging to neighborhoods, keep residents from engaging with each other, deter the location of businesses in those neighborhoods and severely limit future job and employment opportunities for perpetrators.

In addition, youth involvement with criminal gangs is also a significant problem. The resulting drug houses, graffiti, and robberies create a climate of fear in Milwaukee's neighborhoods. Residents, fearing reprisals, are reluctant to cooperate with police and are less likely to venture out to meet neighbors in blocks clubs to address neighborhood concerns.

CDBG funded youth services offer alternatives to at-risk youth and those involved in gangs. More aggressive efforts must be made to reach out to disconnected and at-risk youth who may not be in school, connected to a church or participating in a mainstream youth organization.

Youth Employment

- 46.8 % of all black men between the ages of 16 and 64 in Milwaukee were jobless, compared to 17.9 percent of white men in that age range.¹
- The massive problem of high unemployment for Black youth is huge and complex. A major contributing factor is the Black male failure in education with school districts like Milwaukee experiencing the lowest graduation rates (24%) for Black males in the country.⁴
- The majority (80%) of full-time openings in the Milwaukee metro area require post-secondary education, training, and/or occupation-specific work experience, meaning that very few full-time job openings are available for persons who have not completed high school and who lack job experience.⁵

Oct., 2007, University of Wisconsin-Milwaukee's Center for Economic Development¹

"The Crisis of Black Male Joblessness in Milwaukee: Trends, Explanations, and Policy Options, March 2007," Marc Levine, University of Wisconsin-Milwaukee's Center for Economic Development²

Milwaukee Community Journal, 3/21/07³

"Public Education and Black Male Students: A State Report Card," by The Schott Foundation for Public Education, 2004⁴

UWM Employment and Training Institute, **Job Opportunities for Milwaukee Youth**, based on the Private Industry Council of Milwaukee County 2006 Employer Job Openings Survey.⁵

YOUTH NEEDS

Youth needs fall into five key areas:

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

EFFECTIVE PROGRAM APPROACHES

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

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

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

Implementation Strategy:

- Provide Job Readiness, Vocational and Customized Training, to provide young people with real world work experiences and skills needed in today's workforce; and to help build a strong work ethic and connections with employers.

- Support the City's Summer Youth Internship Program for high school youth to provide internships in City government and in the private sector.
- Invest in life skills development and programs to improve educational achievement.
- Support prevention and intervention programs for at-risk youth to help decrease gang activity and youth violence and to help youth develop self-esteem, self confidence, goal-setting and attainment skills.
- Support neighborhood-based youth development programs, which provide outreach and access to high quality prevention and intervention programming including tutoring, mentoring, teen pregnancy prevention, safe havens and recreation.
- Support for interventions targeted at dealing with the aftermath of violence – within the family and the larger community – as a strategy for preventing future violent behavior.
- Civic Engagement-providing internships and apprenticeships for youth by involving them in leadership roles and community development opportunities within Milwaukee's nonprofit sector.

PUBLIC SAFETY and QUALITY OF LIFE

Public Safety remains a dominant concern in central city Milwaukee. While the Milwaukee Police Department reported a 10% decline in violent crime in 2008 including a 20 year low in homicides and a 6% overall crime decline; still nearly 10% of the population was the victim of a personal or property offense in 2008 according to Wisconsin Incident Based Reporting. In addition, Milwaukee Police issued over 108,600 citations in 2007, according to the latest City of Milwaukee Public Safety Report, for "quality of life" offenses such as loud music, prostitution, public drinking, loitering and other activities. Crime or the perception of crime in neighborhoods is a frequently cited consideration for residents moving out of the City and is one of the most frequently voiced concerns of residents through community surveys and community meetings. Actual crime or the perception of crime has real economic and community development costs as businesses may relocate, investment in businesses and housing may be deterred, and consumer spending may flee the City, eroding the City's tax base and ability to provide essential public services.

COMMUNITY ORGANIZING and CRIME PREVENTION

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

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

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

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

Implementation Strategy

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

Environmental Issues

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

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

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

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

STRATEGIC GOAL: Environment

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

Implementation Strategy:

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

ANTI-POVERTY STRATEGY

91.215 (h)

47) Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually).

48) Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

Response:

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

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

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

- Jobs and job creation must be at the centerpiece of the poverty reduction strategy in light of Milwaukee's job gap (difference between the number of persons expected to work and the number of available jobs). The creation of jobs, the matching of jobs to the skills of the labor force, and the location of jobs are all fundamental components of the anti-poverty strategy notwithstanding the fact that much of Milwaukee's economic future will be determined by regional and global economic forces rather than local decisions.
- The opportunity to work, prepare for work, or contribute to the community's improvement should be built into every program providing services to people living in poverty.
- Programs which support strong families and promote safe neighborhoods can help create environments conducive to investment and economic development. Greater linkage between business activity, social services and community organizing, for example, can maximize resources and significantly enhance the impact of public dollars.
- Successful efforts to reduce poverty, particularly in targeted neighborhoods, require the combined efforts of the public sector funding and services, non profit and business. Collaborative efforts provide the level of sustained investment and the breadth of skill needed to achieve significant reductions in the level of poverty.
- The investment in human capital is critical. This means working cooperatively with Milwaukee Public Schools, colleges and universities, and employment and training programs to constantly improve the quality of Milwaukee's labor force and to enhance individual economic opportunity. In many instances, the development of individual economic ability requires one-on-one case management, multiple social services and housing assistance in addition to education and training resources.

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

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

Implementation Strategy:

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

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS

COMMUNITY DEVELOPMENT ACTIVITIES

Program Category	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	2-5 yr benchmarks	FY 2010 benchmarks
Public Services- Employment Services	Provide Job Placement/Job Training & Placement assistance for low income persons	Suitable Living Environment	Expand economic opportunity	# low income persons trained & placed into jobs	750	150
Public Services- Youth Services	Increase employment, education, recreation, mentoring, tutoring, teen pregnancy prevention, safe havens for youth	Suitable Living Environment	Sustainability	# youth with increased access to services	75,000	15,000
Public Services- Crime Awareness & Community Organizing	Facilitate residents/stakeholder in community improvement efforts; crime prevention initiatives	Suitable Living Environment	Sustainability	# residents & stakeholders engaged in community improvement efforts	15,000	3,000
Public Services- Community Prosecution Program	Abate neighborhood nuisances & drug houses through prosecution	Suitable Living Environment	Sustainability	# properties & nuisances abated/resolved	500	100
Public Services- Driver's Licenses Recovery	Assist low income persons with driver's license recovery & other supportive services	Suitable Living Environment	Sustainability	#low income persons obtaining a valid driver's license	625	125
Public Services- Homebuyer Counseling	Provide homebuyer counseling & budget counseling for 1 st time homebuyers	Suitable Living Environment	Sustainability	#low income persons obtaining a home mortgage loan	750	150
Public Services- Community Outreach & Technology	Increase access to computer technology and training for low income residents	Suitable Living Environment	Sustainability	#low income persons with improved access to computer technology	6,000	1,200
Acquisition of Real Property	Acquire blighted properties for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	15	3
Disposition	Dispose of vacant lots and blighted parcels for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	1,500	300
Public Facilities & Improvements	Land management and redevelopment of vacant parcels	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	500	100
Clearance & Demolition	Demolish blighted parcels for eventual disposition	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	175	35
Cleanup of Contaminated Sites (Brownfields)	Remediation of Brownfields for eventual redevelopment	Suitable Living Environment	Sustainability	#new housing units and/or jobs created for low income persons	50	10

NEIGHBORHOOD REVITALIZATION STRATEGY AREAS
91.215(b)(2)

50) If the jurisdiction has one or more approved Neighborhood Revitalization Strategy Areas, the jurisdiction must provide, with the submission of a new Consolidated Plan, either: the prior HUD-approved strategy, or strategies, with a statement that there has been no change in the strategy (in which case, HUD approval for the existing strategy is not needed a second time) or submit a new or amended neighborhood revitalization strategy, or strategies, (for which separate HUD approval would be required).

Response: The City is submitting the prior HUD-approved strategy for Neighborhood Revitalization Strategy Area 1 and Neighborhood Revitalization Strategy Area 2. There has been no change in the boundaries or the strategy for either area.

Low Income Housing Tax Credit (LIHTC) Coordination 91.315 (k)

51) States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

Not Applicable

HOMELESS NEEDS

91.205 (b) and 91.215 (c)

**Refer to the Homeless Needs Table 1A or the CPMP Tool's Needs.xls workbook*

52) Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered.

Response: In 2008, the Milwaukee Continuum of Care system, including emergency shelter, transitional housing, permanent supportive housing, and supportive services only projects, served a total of 7,623 people. Providers expect utilization will rise in 2009 as will the number of people unable to access services because no beds/units are available. (As of January 2009, the Continuum of Care HMIS tracks the number of persons who could not be served by facility.)

Generally, families and individuals come to shelters from situations where they have been doubling up with relatives or friends and they are unable to continue that arrangement. During the past 12-18 months, the inability to pay rent, landlord-tenant issues and foreclosure of rental properties have exacerbated the number of people seeking shelter. Mental health, substance abuse and domestic violence are all major contributing factors; however, unemployment and poverty continue to be the root causes of homelessness in Milwaukee. During 2008, there were 11,458 requests for shelter that were made to 2-1-1 @ IMPACT, the community's central information and referral telephone line. The vast majority of calls were for emergency shelter (87.3%) with other callers seeking domestic violence shelter (6.6%), transitional housing (3.1%), and other resources (2.9%).⁹

The Continuum of Care 2009 Point in Time Survey conducted January 28, 2009 provides the most accurate and up-to-date information about the specific characteristics of Milwaukee's homeless citizens. (Note: The Point in Time Survey interviewed 919 homeless adults.)

Homeless Demographics	Number	Percent
Sheltered	747	81.3%
Unsheltered	172	18.7%
Female	357	38.9%
Male	561	61.1%
Veteran	163	17.8%
Age: Under 30	202	22.1%
Age: 31-50	441	48.2%
Age: 51 and over	272	29.8%
Race: African American	553	60.9%
Race: Caucasian	260	28.6%
Race: Mixed Race	40	4.4%
Race: Native American	11	1.2%
Race: Asian	2	.2%
Race: Other	42	4.6%

⁹ 2-1-1@ IMPACT and ACALL, Requests for Emergency Shelter 2008, February 2009.

Homeless Household Status	Number	Percent
Single	658	71.9%
Single with children under 18	207	22.6%
Part of a couple without children under 18	21	2.3%
Part of a couple with children under 18	29	3.2%

Education and Employment Status: Most homeless persons 72.2% have a high school diploma/GED or more education. Twenty-nine percent (29.0%) have some college or technical school up to and including associate and bachelor's degrees (6.3%). Only one out of five (21.1%) homeless people is employed either full or part time; 78.9% are unemployed. Two-thirds of the unemployed (67.9%) indicate that they are 'willing and able to work.' Those who report being unemployed have generally been so for a long time; 70.5% of unemployed homeless report having been jobless for more than six months.

Reasons for homelessness: Homelessness is usually the result of a confluence of factors such as unemployment, family break-up, addiction, mental illness, loss of benefits, and other factors. Following is a listing of reasons for homelessness reported by persons interviewed for the Point in Time. (Note: Totals greater than 100% are because respondents could select 'all that apply.')

Reason for homelessness	Number	Percent
Lost job/cannot find work	355	38.6%
Wages too low	93	10.1%
Family break-up	135	14.7%
Abuse/violence	99	10.9%
Asked to leave (shelter, program, facility, friend, relative)	120	13.1%
Runaway, thrown out of house (minor)	36	3.9%
Discharge from foster care or group home	4	0.4%
Medical problems	93	10.1%
Discharge from jail or prison	78	8.5%
Eviction	120	13.1%
Foreclosure	34	3.7%
High housing costs	99	10.8%
High utility costs	61	6.6%
Substance abuse problems	174	18.9%
Lost benefits	35	3.8%
Mental illness	115	12.5%
Other/don't know	78	8.5%

Frequency of homelessness: Close to half (44.6%) of those surveyed had only been homeless once in the past three years. This means that the majority (55.4%) had two or more homeless episodes with 13.6% reporting five or more episodes in the past three years.

Disability status: Disabilities play a major role in homelessness. Nearly three-fourths (73.6%) reported one or more disabling conditions. Specific disabilities reported include: mental illness (41.1%), medical condition/physical disability (32.2%), alcohol abuse (27.2%), drug abuse (25.1%), developmental disability/learning disability (10.2%), HIV/AIDS (1.5%).

Benefit Utilization: Mainstream benefit programs are considered income support. One out of five (18.7%) homeless persons reported no income support. Other benefit utilizations are as follows: Social Security (4.6%), SSI/SSDI (19.0%), GAMP/BadgerCare Plus (22.1%), BadgerCare (12.2%), TANF/W-2 (9.1%), Food Stamps (45.3%), Veterans Benefits (1.6%), Veterans Health Care (6.2%), Unemployment Benefits (2.9%), and Other (3.6%).

Individuals and Families at Imminent Risk of Homelessness: The 2007 American Community Survey (U.S. Census) reports that 25.2% of the City's population is below the poverty level; for children the rate is 37.2%. A total of 143,016 people in the City of Milwaukee were determined to be living in households with incomes below the poverty level. Poverty rates for different groups provide key insight into the 'near-homeless' population: Caucasian (14.2%), African American (37.1%), American Indian (29.3%), Asian (18.9%), and Hispanic (29.5%); less than a high school diploma (31.8%), and unemployed (40.6%). In addition, nearly half of persons identified as having an employment disability (48.4%) also had incomes below the poverty level. These are populations that are extremely vulnerable to housing instability/imminent risk of homelessness.

53) Describe, to the extent information is available, the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

Response: Two primary sources of quantitative data are provided in this section. The first is the results of the Continuum's biennial point in time survey last conducted January 28, 2009. The second is data obtained from the Continuum's Homeless Management Information System; HMIS data is reported for each of four sub-categories of services: emergency shelter, transitional housing, permanent supportive housing, and supportive services programs.

Point in Time Survey: The Point in Time interviewed 919 adults who were homeless on the night of January 28, 2009. The Point in Time methodology followed the HUD protocol of using a face to face interview with persons in known locations who were homeless – either living on the street, car or other location not fit for human habitation or in shelter or transitional housing. Of this total, 58.8% were African American, 32.2% Caucasian, 9.0% Other, and 5.5% Hispanic.¹⁰ [When children and Rescue Mission clients are included in the tally for the point in time, there were 1,644 people who were homeless (and counted) on the night of January 28, 2009.]

HMIS Data: The Milwaukee Continuum of Care homeless services providers utilize a shared Homeless Management Information System (HMIS) called Service Point to gather and analyze utilization data for the system's emergency shelters, transitional housing, permanent supportive housing and supportive services programs. This information represents data collected by HUD funded agencies and other agencies which have opted in to the HMIS system; the information does not include data from the Rescue Mission facilities, although starting in 2009, the Rescue Mission information will become part of the Continuum's HMIS.

Emergency Shelter: In 2008, there was a total of 3,562 clients served; 64% adults, 36% children. Of the total, 59% were female and 41% male. In terms of race and ethnic origin: 77% were African American, 16% Caucasian, 7% Other, and 5% were Hispanic. Six percent of emergency shelter clients were veterans.

Transitional Housing: In 2008, there were 1,520 clients served in transitional housing; 71% adults and 29% children. Of this total, 74% were African American, 23% Caucasian, 3% Other, and 5% Hispanic; 17% were veterans.

Permanent Supportive Housing: There were 890 clients served in PSH in 2008; 43% female and 57% male; 88% adults and 12% children. Of the total, 59% were African American, 38% Caucasian, 3% Other, and 7% Hispanic. Eleven percent of PSH clients were veterans.

¹⁰ Totals more than 100% because Hispanic persons can be of any race.

Supportive Services Programs: Supportive services programs for homeless persons served 1,651 clients in 2008; 45% female, 55% male with 85% adults and 15% children. Of these clients, 60% were African American, 33% Caucasian, 7% Other, and 10% Hispanic; 6% of Supportive Services clients were veterans.

Homeless Inventory 91.210 (c)

54) The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A or in the CPMP Tool Needs Table. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. This inventory of facilities should include (to the extent it is available to the jurisdiction) an estimate of the percentage or number of beds and supportive services programs that are serving people that are chronically homeless.

The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

Response:

The Continuum of Care's most recent Housing Activity Chart and Service Inventory follow this page.

Organizations	Prevention					Outreach			Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
AIDS Resource Center of Wisconsin		X		X	X	X			X		X	X	X	X				
American Red Cross		X		X		X	X		X			X	X	X				
Aurora Family Services				X														
Benedict Center				X	X				X	X	X	X			X	X		X
Cathedral Center				X					X									
Catholic Charities				X														
Center for Veterans Issues				X	X	X			X	X	X	X	X			X		
City of Milwaukee Rent Assistance		X																
City of West Allis Rent Assistance		X																
Community Advocates	X	X	X	X	X				X		X	X	X				X	X
Community Coordinated Child Care (4 C's) (Provides information/access to child care providers throughout Milwaukee County)																	X	
Day Star									X	X						X		X
Disability Rights Wisconsin				X	X				X									
Genesis Behavioral Health Services, Inc.											X	X						
Goodwill Industries of Southeastern Wisconsin, Inc.									X	X						X		
Grand Avenue Club				X								X						
Greater Milwaukee Free Clinic													X					
Guest House of Milwaukee, Inc.									X	X	X	X	X	X	X	X		X
Health Care for the Homeless – ASTREET Street Outreach Program						X	X											

Priority Homeless Needs

55) Describe the jurisdiction's choice of priority needs and allocation priorities, based on reliable data meeting HUD standards and reflecting the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals.

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

56) Provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless needs category.

57) Provide a brief narrative addressing gaps in services and housing for the sheltered and unsheltered chronic homeless. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

Response to #55,56,57:

The 2009 Point in Time survey counted 253 persons who met the definition of chronically homeless. The Milwaukee Continuum of Care has identified permanent supportive housing for chronically disabled as its' number one priority in its annual Supportive Housing Program submission for the past five years. The specific gaps in services and housing for chronically homeless that support the designation of this group as a top priority are as follows:

- High rates of serious disability:
 - ❖ 55.3% mental illness
 - ❖ 49.0% medical condition/physical disability
 - ❖ 45.5% alcohol abuse
 - ❖ 37.9% drug abuse
 - ❖ 18.2% developmental disability/learning disability
- Unmet service needs (Q: In the past month, what services did you need but could not get?)
 - ❖ 21.3% help finding work
 - ❖ 32.4% help finding permanent housing
 - ❖ 13.4% help obtaining food
 - ❖ 20.2% help with transportation
 - ❖ 11.9% help obtaining medical care
 - ❖ 16.6% help obtaining dental care
 - ❖ 9.1% help getting mental health treatment
 - ❖ 6.3% help getting drug abuse treatment
 - ❖ 8.7% help obtaining government benefits
- Low rates of mainstream benefit utilization:
 - ❖ 9.5% Social Security
 - ❖ 33.6% SSI/SSDI
 - ❖ 10.3% Medicaid/Medicare
 - ❖ 29.6% BadgerCare Plus
 - ❖ 5.1% BadgerCare
 - ❖ 0.0% TANF/W-2

- ❖ 34.0% Food Stamps
- ❖ 4.0% Veteran's Benefits/Pension
- ❖ 5.1% Veteran's Health Care
- ❖ 5.5% Unemployment Benefits
- ❖ 2.4% Other Government Benefits

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

NOTE: The 2009 Point in Time Survey of Milwaukee's Homeless Citizens is located in the Appendix. The Milwaukee Continuum of Care 10-Year Plan to End Homelessness is in progress and will be submitted once completed.

HOMELESS STRATEGY

91.215 (c)

58) Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach, assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living.

Response: The Milwaukee Continuum of Care is in the process of completing its 10-Year Plan to End Homelessness. This plan will include a movement toward a) enhanced homelessness prevention; b) greater emphasis on rapid re-housing for both families and individuals; and c) increased capacity to provide permanent supportive housing to people with disabilities. Although the 10-Year Plan is not finalized, the Continuum of Care envisions the following operational system:

Homelessness Prevention: The Continuum of Care's 10-Year Plan to End Homelessness will support homelessness prevention through a three-pronged strategy to: 1) raise community awareness and involvement in homelessness prevention; 2) stabilize at-risk individual and families through discharge coordination, landlord-tenant mediation and short term rent assistance; and, 3) support central access to homeless services and information that incorporates sound diversion practices. The Continuum also developed its Homeless Prevention and Rapid Re-Housing Plan incorporating these elements.

Outreach/Assessment: The Milwaukee Continuum of Care will continue to operate street outreach through the Center for Veterans Issues, Health Care for the Homeless and Community Advocates Homeless Nursing Outreach Program. All are well-established programs that emphasize working with hard-to-reach individuals living on the street or other locations not fit for human habitation. In addition, the Continuum plans to increase community awareness of homelessness and services to prevent homelessness as part of its 10-Year Plan. Screening and assessment systems have been developed by each of the street outreach entities. In addition, 2-1-1 @ IMPACT has established telephone procedures to identify callers' housing needs and to assist them in consideration of alternative solutions that may or may not involve a stay in emergency shelter.

Emergency Shelters and Services: Milwaukee will continue to operate 720 emergency shelter beds, 289 for families and 431 for individuals. Another 43 beds are available at Safe Havens. In addition to shelter, emergency shelters and Safe Havens will provide assessment, service referral and case management support directed toward assisting residents to find a stable source of income and a permanent place to live. Depending on the shelter program, education, employment, health care and behavioral health services are also made available either on-site or through direct referral with partnering organizations.

Transitional Housing: Milwaukee currently operates 742 transitional housing beds, 416 family beds and 326 individual beds. The 10-Year Plan process is examining how this resource best fits into the Continuum's overall emphasis on homelessness prevention and rapid re-housing; however, the transitional housing inventory will remain an essential resource for Milwaukee's homeless population.

Transition to Permanent Housing: The Milwaukee Continuum of Care adopted a Housing First approach in its last strategic plan completed in 2005; this basic philosophy will continue in the 10-Year Plan. In 2008, Milwaukee had 845 units of permanent supportive housing, 214 for families and 631 for individuals. Planned development of permanent supportive housing units will enable the Continuum to implement this approach in the coming years. A critical step in the transition to permanent housing is the acquisition of a reliable source of income. For that reason, the 10-Year Plan will emphasize improved utilization of mainstream benefits, specifically increased enrollment in SSI/SSDI which provides income as well as health care coverage for physical and mental health

needs. Employment is another critical part of being able to maintain permanent housing. The 10-Year Plan will include an employment component that will improve the connection of homeless people to the employment and training resources available through the Milwaukee Area Workforce Investment Board, specifically focusing on resources to bring academic skills up to a point where homeless individuals can be considered for inclusion in MAWIB supported training programs in the skilled trades. Further, the 10-Year Plan will include planning for a possible social enterprise modeled on successful homeless businesses operating in other cities that provide homeless people with practical job skills and help develop stronger work habits. Addressing the income challenge is fundamental to sustainable permanent housing.

59) Describe the jurisdiction's strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

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

- 1) **Landlord/tenant mediation** including dispute resolution, case management and the provision of short-term rental assistance to individuals and families who are at imminent risk of eviction and homelessness.
- 2) **Legal services** including eviction prevention assistance to low-income renters who are at risk of homelessness due to nonpayment of rent, foreclosure, or other circumstance.
- 3) **Prevention of homelessness related to foreclosure of rental units** by providing assistance to Section 8 households which are subject to 5-day eviction orders as a result of foreclosure on the unit in which they are residing.
- 4) **Development of a discharge coordination policy.**
- 5) **Redesign and implementation** of an effective **central intake/referral/diversion system** that will effectively and appropriately redirect individuals and families to utilization of family and community supports to prevent homelessness and a resulting shelter stay when those resources are available.

Chronic Homelessness

60) Describe the jurisdiction's strategy for eliminating chronic homelessness. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented in Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness.

Response: The 2009 Milwaukee Point in Time Count identified 253 individuals who met the HUD definition of chronically homeless. (It is important to note that this number may underestimate the number of chronically homeless because not all such persons frequent the known places, e.g. meal programs, libraries, and identified encampments or gathering places that were the subject of the point in time count.) Chronically homeless individuals face critical issues which must be addressed in efforts to eliminate chronic homelessness including:

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

Despite the high rate of disabilities, only 24.1% of chronically homeless are currently receiving SSI (Supplemental Security Income) or SSDI (Social Security Disability Income) to establish a minimum level of monthly income. Only 19% of chronically homeless were employed either full or part-time.

The combination of high disability rates and high prevalence of individuals with no income (either from employment or SSI/SSDI) requires a comprehensive cross-system strategy.

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

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

61) Describe the efforts to increase coordination between housing providers, health, and service agencies in addressing the needs of persons that are chronically homeless.

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

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

Homelessness Prevention

62) Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.

The Continuum of Care's 10-Year Plan to End Homelessness will support homelessness prevention through a three-pronged strategy to: 1) raise community awareness and involvement in homelessness prevention; 2) stabilize at-risk individual and families through discharge coordination, landlord-tenant mediation and short term rent assistance; and, 3) support central access to homeless services and information that incorporates sound diversion practices. The Continuum also developed its Homeless Prevention and Rapid Re-Housing Plan incorporating these elements.

Institutional Structure

63) Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.

Response: The Milwaukee Continuum of Care is a community coalition comprised of over 100

member organizations including homeless services providers, local government, faith-based organizations, business, public school system, veterans' organizations, legal services agencies, housing developers, advocacy groups, community action agency, and consumers. Community Advocates functions as the Continuum's lead agency and fiscal agent; the Continuum functions as an unincorporated coalition with an elected/appointed steering committee comprised of 12 members. The Steering Committee includes appointees of the Mayor of the City of Milwaukee and the Milwaukee County Executive as well as the chairperson of the Shelter Task Force and the Continuum's HMIS (Homeless Management Information System) Coordinator; the remaining members are elected to two-year terms by Continuum of Care members in good standing as evidenced by a consistent level of attendance and participation in the year preceding the election. The Steering Committee and the Continuum of Care are co-chaired by individuals representing the public sector (local government) and the private sector (nonprofit organizations) as required by HUD. The Continuum is staffed by Community Advocates.

The Continuum of Care is the principal vehicle by which the homelessness strategy will be carried out. Consistent with the process of developing the 10-Year Plan, the Continuum will continue to expand its membership to include representatives of new entities and to partner with organizations to address specific high-need areas such as the development of a discharge coordination policy.

Discharge Coordination Policy

64) Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

Response: The Milwaukee Continuum of Care *10-Year Plan to End Homelessness*, to be completed by August 2009, will include a specific goal and objective relating to the development of a discharge coordination policy that will prevent homelessness resulting from discharge from foster care, health care facilities, mental health facilities and corrections. Up to this time, the Continuum of Care has relied upon individual agreements which have been included in the annual Exhibit 1 submission to HUD; however, it has been determined that a community-wide approach is preferable as it would generate greater compliance and more consistently result in the prevention of homeless episodes for these vulnerable populations.

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

The planned strategy for achieving a community-wide discharge coordination policy is to address one major system each year starting with the Bureau of Milwaukee Child Welfare foster care system (2010) and moving to mental health facilities, health care facilities and corrections in subsequent years (2011-2013).

SPECIFIC OBJECTIVES HOMELESS (91.1)

65) Identify specific objectives that the jurisdiction intends to initiate and/or complete in accordance with the tables* prescribed by HUD, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Complete and submit table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries .xls worksheets.

See *Summaries .xls* worksheets located in the CPMP Tool.

66. Identify each specific objective developed to address a priority need by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e. one, two, three or more years), or in other measurable terms as identified and defined by the jurisdiction.

The jurisdiction may satisfy this requirement by using Table 3C or, if using the CPMP Tool, the Projects.xls worksheets.

In addition, to the chart below, see the *.Summaries .xls* worksheets located in the CPMP Tool.

SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS SHELTER & SERVICES FOR HOMELESS PERSONS

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	2-5yr Benchmarks	FY 2010 benchmarks
Emergency & Transitional Shelter & supportive services	Provide emergency shelter & transitional housing & supportive services to promote housing stability & independence	Suitable Living Environment	Availability/ Accessibility	# low income, homeless persons achieving housing stability, safety & independence	30,500 (CDBG funds) 22,000 (ESG funds)	6,100 (CDBG funds) 5,600 (ESG funds)

Emergency Shelter Grants (ESG)

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

Not Applicable.

PRIORITY NON-HOMELESS SPECIAL NEEDS

91.205 (d) & 91.210(d) Analysis including HOPWA

Refer to Table 1B Non Homeless Special Needs or the CPMP Tools' Needs .xls workbook

68) Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, public housing residents, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (Table 1B or Needs.xls in CPMP Tool) of their Consolidated Plan to help identify these needs. *Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

69) Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

70) Describe the basis for assigning the priority given to each category of priority needs.

71) Identify any obstacles to meeting underserved needs.

Response: (See also HOPWA section and the Milwaukee Housing Authority section)

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

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

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

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

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

Implementation Strategy:

- Support the construction and rehabilitation of housing units for the disabled.
- In all housing rehabilitation activities, to the extent possible, address any unmet needs of persons with disabilities before, during and after rehabilitation of relevant units.
- Support the Housing Accessibility Program to construct handicapped accessible ramps and other accessibility modifications for persons with physical and other disabilities.
- Support programs that assist the elderly in remaining in their own homes, and that assist the elderly in accessing various supportive services (transportation, social services, etc).
- Maximize the use of elderly public housing developments.
- Provide housing and supportive services to persons with HIV/AIDS.

**SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS
NON HOMELESS & SPECIAL NEEDS POPULATIONS**

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	2-5 yr Benchmarks	FY 2010 benchmarks
Housing units for disabled persons	Increase the supply of affordable housing units	Suitable Living Environment	Sustainability	#affordable housing units constructed for low income disabled persons	25	5
Accessibility Improvements for disabled	Construct handicapped ramps and & other accessibility modifications	Suitable Living Environment	Availability/ Accessibility	#accessibility improvements constructed for low income disabled persons	125	25
Employment Services	Provide Job placement & Job Training & Placement services	Suitable Living Environment	Sustainability	#low income persons trained & placed in jobs	50	10
Housing & supportive services for persons with HIV/AIDS	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	See HOPWA section	See HOPWA section

Special Need Facilities and Services

72) Describe, to the extent information is available, the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring persons returning from mental and physical health institutions receive appropriate supportive housing.

There are numerous facilities in the City and County of Milwaukee operated by Milwaukee County, the State of Wisconsin, private operators and others that assist persons who are not homeless but require supportive housing. Such facilities are comprised of community-based residential facilities, housing for veterans, the elderly and other licensed assisted-living facilities which provide housing combined with appropriate supportive services and case management for various populations such as mentally ill, disabled and those with drug and/or alcohol issues, all of which are widely dispersed throughout the City of Milwaukee. In addition, there are several facilities that provide housing with supportive services for persons with HIV/AIDS and their families. These facilities are explained in more detail in the section Housing Opportunities for Persons with AIDS-Specific HOPWA Objectives.

In addition, the following chart includes apartments funded through HUD subsidized programs of which a participant would pay 30% of income towards rent.

Name of Apartment Complex	Address (all are located in Milwaukee County)
Bayview Manor	704 E. Linus Street
Blanche & Madge Home	6965 N. 55 th Street
Calvin Courtyard Apts. I & II	2121 N. 2 nd Street
Carver Park I & II	W. Brown/N. 6 th Street/W. Land/N. 7 th Street
Cherry Court	1274 N. 17 th Street
Clare Court	3049 & 3096 N. 59 th Street
Clare Towers Apts.	1546 S. 29 th Street
Convent Hill	1325 N. Jefferson Street
Euclid Arms Apts.	3130-40 S. 20 th Street
Forest Towers-Metro	9609 & 9619 W. Allyn Street
Housing Authority of the City of Milwaukee	Scattered Sites throughout Milwaukee
Hedwig House Apts.	1724 N. Humboldt Avenue
James and John Apts.	8614 W. Fond du Lac Avenue
La Corona Apts.	1655 S. 3 rd Street
Melvin J. Battle Apts.(Calvary Apts.)	3131 N. Martin Luther King Drive
Myrtle Davis Senior Complex	5822 W. Custer Avenue
Park Bluff Apts.	555 S. Layton Blvd.
Park Hill Senior Apts.	536 W. Concordia Ave.
Park West Apts.	2342 N. 35 th Street
Refreshing Springs Apts.	8680 W. Fond du Lac Avenue
St. Mark Place	2025 N. 14 th Street
Three Oaks Circle	6200 W. Waterford Court
UCC Village	738 W. Washington Street
Winchester Village	2147 S. Winchester Street
Windsor Court	1831 W. Juneau Avenue

73) If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

The jurisdiction does not intend to use HOME funds for tenant based rental assistance.

Specific Special Needs Objectives (91.215)

74) Identify each specific objective developed to address a priority need by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e. one, two, three or more years), or in other measurable terms as identified and defined by the jurisdiction.

The jurisdiction may satisfy this requirement by using Table 3C or, if using the CPMP Tool, the Projects.xls worksheets

See *Projects .xls* worksheets located in the CPMP Tool.

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

See Spreadsheet on leveraged resources located in the Additional Files Folder.

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

76) Describe the activities to be undertaken with HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living.

See narrative below.

77) Identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.

See narrative below.

78) The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

See narrative below.

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

Not Applicable.

80) Provide an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.

See narrative below.

81) Describe the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.

See narrative below.

82) Include the certifications relevant to the HOPWA Program.

All required certifications for HOPWA are included separately with this submission.

Specific HOPWA Objectives

83) Identify specific objectives that the jurisdiction intends to initiate and/or complete in accordance with the tables* prescribed by HUD.

Complete and submit Table 1C Summary of Specific Objectives or, if using the CPMP Tool, the Summaries.xls worksheets.

See narrative below and also CPMP Tool, Summaries .xls worksheets.

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

See narrative below.

Response: Housing Opportunities for Persons with AIDS (HOPWA)

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

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

Community Needs

Through December, 2008 the cumulative number of HIV-positive people living in the four-County area is 5,473. Cumulatively, Wisconsin has seen 10,316 cases of HIV infection. The State of Wisconsin estimates that there are at least 2,500 additional people in Wisconsin who are living with HIV and have not been diagnosed. Milwaukee County remains the epicenter of the AIDS epidemic in the state, reporting 51% of the state's cumulative AIDS cases and 49% of the state's cumulative HIV infections. (*Source: Wisconsin Division of Public Health Wisconsin AIDS/HIV Program, 2009*)

Fifty-four percent of the state's HIV-positive population lives in this four-county area. The average annual reported rate of HIV infection in Milwaukee is 13.1 per 100,000, which is 6.4-fold higher than the rate in non-metropolitan counties. In the Milwaukee Metro Area there has been a cumulative total of 5,473 cases of HIV infection, 3,490 of who are presumed to be alive.

Of the population of HIV/AIDS households, 95% are 25 or older; 76% are men, 24% women; 50% are Caucasian, 42% are African-American, 2% are Native American and 6% are other races; 10% are Hispanic and 90% are Non-Hispanic or an unknown ethnicity. Clients will be selected through HIV care and treatment programs at AIDS service organizations, private physician offices and minority community-based providers. All clients who meet HUD income eligibility criteria will be accepted into the program regardless of where they access other services.

Based on statistical information gathered by the AIDS Resource Center of Wisconsin and the State Office of AIDS, approximately 40% of HIV-positive clients (presumed to be alive) per year, have been served in the past three years with the following services: short-term rent, mortgage and utility payments, (STRMU), transitional housing assistance and housing and supportive services. Additionally, over 97% of HIV-positive clients who received some form of housing assistance or housing counseling also received some other supportive service. Supportive services include social work case management, assistance with legal issues, food, transportation, employment support, financial assistance and health care.

Obstacles/Barriers

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

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

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

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

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

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

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

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

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

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

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

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

The City of Milwaukee will prioritize the allocation of HOPWA funds to programs that work to overcome these barriers to housing experienced by people with HIV/AIDS.

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

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

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

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

Annual HOPWA Output Goals

In partnership, and at funding levels currently in place, it is projected that these entities will provide the following number of households with housing assistance and supportive services over the five year plan:

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

Implementation Strategy:

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

Housing Options to be utilized

A. Permanent Housing

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

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

Other permanent housing options for people with HIV will include:

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

B. Transitional Housing

For individuals there are 41 units of project based supportive transitional based housing available, consisting of:

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

**SPECIFIC PERFORMANCE MEASUREMENTS/BENCHMARKS
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS**

Activity	Strategy	HUD Objective	HUD Outcome	HUD Performance Indicator	2-5 yr benchmarks	FY 2010 benchmarks
Short-term Rent, Mortgage, Utility Assistance	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	1,555	285
Tenant-Based Rent Assistance	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	1,100	200
Facility Based programs	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	325	63
Units in facilities supported with operating costs	Provide housing & services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	345	65
Supportive services in conjunction with housing activities	Provide supportive services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	3,770	740
Housing Placement Assistance: Housing Information Services	Provide housing information & housing placement services to facilitate housing stability & independence	Suitable Living Environment	Sustainability	# low income persons obtaining housing stability & independence	3,070	600

Role of Lead Jurisdiction

The City of Milwaukee-Community Development Grants Administration, in conjunction with local government housing officials and HIV housing service providers, convened a Housing Task Force to complete the consolidated planning process in 2009. Representatives from the following entities were invited to participate in the planning process: Aids Resource Center of Wisconsin(ARCW), City of Hartford Housing Authority, Elena's House, Healthcare for the Homeless, Ozaukee County Housing Authority, Richard's Place(Waukesha), Washington County Housing Authority and the Waukesha Public Housing Authority.

Over the course of 3 meetings, numerous consultations and discussions, task force members focused on strategic planning for the provision of services for persons with HIV/AIDS, primarily housing and various supportive services.

See HOPWA Needs/Gaps/Analysis Chart which follows this page.

Needs/Gaps Analysis – HOPWA – 5 year Consolidated Plan

Project/Activity Type	Units Available	Assistance Levels	Funding Source	Need	Gap	Priority (High, Medium, Low)
Transitional Housing, facility <ul style="list-style-type: none"> • Richard's Place • Health Care for the Homeless • Elena's House • ARCW Wisconsin House 	41 units, 24 month limit	Full subsidy for housing costs in excess of 30% of residents income	Formula HOPWA HUD SHP Waukesha CDBG Waukesha Public Housing Private	293 units	252 units	Medium
Transitional Housing, tenant-based	150 slots, 12 or 24 month limits	Full subsidy for housing costs in excess of 30% of residents income	Competitive HOPWA Private	1,071 units	871 units	Medium
Permanent Housing , facility based <ul style="list-style-type: none"> • Richard's Place • Elena's House • ARCW Gardenview Apartments 	12	Full subsidy for housing costs in excess of 30% of residents income	Formula HOPWA HUD SHP Waukesha Public Housing HUD Section 811 Private	86 units	23 units	High
Permanent Housing, short term assistance to maintain housing <ul style="list-style-type: none"> • Richard's Place • ARCW 	267	Full subsidy for housing costs in excess of 30% of residents income	Formula HOPWA Private	2,320 units	2,053 units	Highest
Permanent Housing, project based vouchers <ul style="list-style-type: none"> • Waukesha Public Housing Authority 	9	Full subsidy for housing costs in excess of 30% of residents income	HUD Section 8	43 units	34 units	High
Permanent Housing, shelter plus care <ul style="list-style-type: none"> • Waukesha Public Housing Authority • Milwaukee County 	32	Full subsidy for housing costs in excess of 30% of residents income	HUD Shelter Plus Care	257 units	221 units	High
Permanent Housing, tenant based vouchers	20	Full subsidy for housing costs in excess of 30% of residents income	HUD Section 8	71 units	51 units	High

Project Type	Priority	Current Units	Ratio of all Units	Need distribution of 4,141 persons across activities (1)			Gap distribution of 3,610 persons across activities(2)		
Permanent Housing-Short-term assistance	Highest	267	50%	2,082	2,185	2,288	1,815	1,918	2,021
Permanent Housing-Project-based vouchers	High	9	2%	70	67	63	61	58	54
Permanent Housing-facility-based	High	12	2%	94	89	84	82	77	72
Permanent Housing-Shelter plus Care	High	32	6%	250	237	225	218	205	193
Permanent Housing-Tenant-based vouchers	High	20	4%	155	148	140	136	128	120
Transitional Housing-facility	Medium	41	8%	320	304	288	279	263	247
Transitional Housing-tenant-based	Medium	150	28%	1,170	1,111	1,053	1,020	961	903
Total		531	100%	4,141	4,141	4,141	3,610	3,610	3,610

Projected Number of People with HIV to be served in the next 5 years:

Total: Reported HIV cases (as of 12/08)	5,473
Less: Reported HIV deaths (as of 12/08)	1,983
Total number of people presumed living with HIV	3,490
Less: 10% of individuals living below 200% of the FPL	349
Total number of current people with HIV in need of Housing services	3,141
Plus: Projected new HIV cases in next 5 years	1,000
Total number of people with HIV in need of housing Services through 5-year Consolidated Plan	4,141

(1) Three distribution options have been presented here:

- a. Current – using the same ratio of current project types to allocate the projected 4,141 people in need of housing services
- b. 5% - using the same ratio of current project types and reallocating 5% of 4,141 people to the highest priority project type
- c. 10% - using the same ratio of current project types and reallocating 10% of 4,141 people to the highest priority project type

Note that based on the option selected, these numbers would be listed in the Need column of the Needs/Gaps/Analysis Chart.

(2) Note that based on the option selected these numbers would be listed in the Gap column of the Needs/Gaps/Analysis column.

Standards and Procedures to Monitor Compliance with HOPWA Regulations

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

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

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

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

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

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

In addition, providers utilize numerous evaluation methods including client satisfaction surveys, focus groups, client interviews, staff interviews and review of client records to assess the effectiveness of programs.

OTHER NARRATIVES AND ATTACHMENTS

Include any Strategic Plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.

HOME/ AMERICAN DREAM DOWNPAYMENT INITIATIVE (ADDI)

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

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

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

Response:

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

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

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

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

Repayment Schedule

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

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

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

Not Applicable - The City will not use HOME or ADDI funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:

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

Response: Not Applicable. The City of Milwaukee will not receive ADDI funds for 2010.

Section 108 Loan Guarantee

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

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

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

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

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

END