



C D G A

Community Development Grants Administration

HOME-ARP ALLOCATION PLAN

City of Milwaukee, WI

Developed August 2022 - February 2023

March 2023

To be submitted to the U.S. Department of Housing & Urban Development by the:

Community Development Grants Administration

Steven L. Mahan, Director

City Hall – 600 East Wells Street, Room 606

Milwaukee, Wisconsin

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

Table of Contents	Error! Bookmark not defined.
Executive Summary	3
Consultation	4
Public Participation	8
Needs Assessment and Gaps Analysis	11
Number of Clients Served by Program	13
Age of Clients Served	14
Gender of Adults Served	14
Race of Clients Served	15
Ethnicity of Clients Served	15
HOME-ARP Activities	35
Use of HOME-ARP Funding	36
HOME-ARP Production Housing Goals	37
Preferences	38
Referral Methods	38
Limitations in a HOME-ARP rental housing or NCS project	39
HOME-ARP Refinancing Guidelines	39
Conclusion	38
Appendix A	40
Bibliography & Data Sources	Error! Bookmark not defined.
Appendix B	41
Milwaukee-area Agencies in the Homeless Services System	Error! Bookmark not defined.
Appendix C	45
Milwaukee Public Housing Developments	Error! Bookmark not defined.
Appendix D	47
Public Participation	Error! Bookmark not defined.

Executive Summary

In FY 2021, the American Rescue Plan (ARP) Act included an allocation of \$20,309,464 to the City of Milwaukee through the HOME Investment Partnerships Program at the U.S. Department of Housing and Urban Development (HUD). This funding will allow the City of Milwaukee to make significant, targeted investments in permanent supportive housing and assist people experiencing homelessness, those at risk of homelessness, and those at the greatest risk of housing instability.

Through the Community Development Grants Administration (CDGA) department, the City of Milwaukee administers the following HUD grant programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). CDGA has also been the recipient of CDBG-CV and ESG-CV funding as part of the COVID-19 pandemic response. The City's 2020-2024 HUD Consolidated Plan and Annual Action plans provide considerable detail on the strategies Milwaukee is following to address affordable housing, economic development, supportive housing, homeless needs, and other issues related to poverty.

In addition, the City of Milwaukee serves as the designated collaborative applicant for the Milwaukee City and County Continuum of Care, the entity responsible for planning, organizing, and evaluating services for individuals and families experiencing homelessness. The City of Milwaukee HOME-ARP allocation will be aligned with these previous and ongoing efforts.

This HOME-ARP Allocation Plan outlines the community consultation, public participation and planning process, an assessment of needs for each qualifying population, information about resources and gaps, housing production goals, and an overview of the funding allocation. Once the City's HOME-ARP Allocation Plan is approved, the funding will be made available with a period of performance that will end on September 30, 2030.

Consultation

Summarize the consultation process including methods used and dates of consultation.

The City of Milwaukee CDGA worked with its CDBG-contracted technical assistance provider, the Urban Economic Development Association of Wisconsin (UEDA) to develop its HOME-ARP Allocation Plan. UEDA is a local nonprofit organization that previously worked with the City to develop its most recent HUD Consolidated Plan and has an extensive network of community and economic development organizations, cross-sector professionals, and others deeply engaged in housing issues.

For the needs assessment and gaps analysis, UEDA developed an electronic survey tool and distributed it to all consulting agencies/participants to solicit feedback directly. The survey was distributed via the Milwaukee Continuum of Care (CoC) listserv, direct emails, and UEDA's contact database (1,400+). UEDA also met with various CoC members multiple times and conducted one-on-one calls as needed with groups that address the needs of qualifying populations and other groups as outlined in the HOME-ARP plan guidance.

Quantitative data was collected by UEDA from the City of Milwaukee Department of City Development related to housing inventory and gaps, Housing Authority of the City of Milwaukee (HACM), Milwaukee CoC Coordinated Entry team, and Milwaukee CoC Homeless Management Information System (HMIS). UEDA also reviewed and consulted other strategic housing plans developed since 2020 that focus on Milwaukee's housing needs.

Once the draft plan was complete, UEDA worked with the City of Milwaukee CDGA to publish it online, share with all groups consulted, and host public hearings to explain the components of the plan and receive public input.

List the organizations consulted:

The qualifying populations (QP) being served by the organizations listed below are noted with "QP" and number of the target population(s). Example: QP1,2,4.

1. *Experiencing homelessness*
2. *At risk of homelessness*
3. *Fleeing (or attempting to flee) domestic violence, dating violence, sexual assault, stalking, or human trafficking*
4. *Other Populations requiring services or housing assistance to prevent homelessness OR at greatest risk of housing instability*

Additional consultation was done with public and private organizations that provide housing services, address fair housing, civil rights, and the needs of veterans and persons with disabilities.

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Cathedral Center	Community-based Organization (QP1,2,3,4)	Focus group Needs survey	Unmet housing and service needs
Center for Veterans Issues (CVI)	Community-based Organization (Veterans & QP1,2,4)	Needs survey	No feedback received
City of Milwaukee Department of City Development	Public Agency	Correspondence Data request	Quantitative data on needs, inventory gaps

CommonBond Communities	Affordable Housing provider (QP4)	Needs survey	Unmet housing and service needs
Community Advocates	Community-based Organization (QP1,2,3,4)	Needs survey	Unmet housing and service needs
Disability Rights Wisconsin	Community-based Organization (QP4, people with disabilities)	Needs survey Correspondence	Unmet housing and service needs
Exploit No More	Community-based Organization (QP1,2,3,4, trafficking)	Needs survey	Unmet housing and service needs
Franciscan Peacemakers	Community-based Organization (QP1,3, trafficking)	Focus group Correspondence	Unmet housing and service needs
Hope House	Community-based Organization (QP1,2,3,4)	Needs survey Focus group Correspondence	Unmet housing and service needs
Housing Authority of the City of Milwaukee	Public Housing Authority (PHA)	Needs survey Data Request Correspondence	Data on public housing units and vouchers
IMPACT, Inc	Community-based Organization Coordinated Entry (QP1,2,3,4)	Needs survey Focus group Correspondence	Unmet housing and service needs, Coordinated Entry
Independence First	Community-based Organization (QP4, people with disabilities)	Needs survey Correspondence	Unmet housing and service needs
Institute for Community Alliances (ICA)	HMIS provider	Data Request Correspondence	HMIS data on services, projects & gaps
Medical College of Wisconsin	Healthcare provider (QP1,2,3,4)	Needs survey	Unmet housing and service needs
Mental Health Task Force / Make It Work Milwaukee	Community coalition (organizations that serve people with disabilities, mental health, recovery, etc.)	Needs survey	Shared survey link with network
Mercy Housing Lakefront	Community-based Organization (QP1,2,4)	Needs survey	Unmet housing and service needs
Metropolitan Milwaukee Fair Housing Council	Community-based Organization (civil rights, fair housing)	Needs survey Correspondence	Unmet housing and service needs
Milwaukee Continuum of Care Steering Committee Leadership Group See Appendix C for members list.	CoC	Virtual meetings Needs survey Correspondence Data Request	Unmet housing and service needs

Milwaukee County Violence Response Public Health & Safety Team	Public Agency	Needs survey Focus Group Correspondence	Unmet housing and service needs
Milwaukee Homeless Veterans Initiative	Community-based Organization (QP1,2,4 & veterans)	Needs survey Correspondence	No feedback received Feedback in ConPlan
Milwaukee Public Schools Homeless Outreach	Public Agency (QP4)	Correspondence	Feedback in ConPlan
Nonprofit & private sector affordable housing developers	Housing provider - Various	Focus group Correspondence	Feedback on unmet needs, projects
Pathfinders Milwaukee, Inc	Community-based Organization (QP1,2,3,4)	Needs survey	Unmet housing and service needs
Reclaiming Our Neighborhoods (RON) Coalition	Community coalition	Focus group Correspondence	Unmet housing and service needs
Repairers of the Breach	Community-based Organization (QP1,2,4)	Needs survey	Unmet housing and service needs
Sirona Recovery	Community-based Organization (QP1,2,4)	Needs survey	Unmet housing and service needs
Sojourner Family Peace Center	Community-based Organization (QP3, domestic violence)	Needs survey Correspondence	Unmet housing and service needs
Street Angels Milwaukee Outreach	Community-based Organization (QP1)	Needs survey	Unmet housing and service needs
The Asha Project	Community-based Organization (QP3, domestic violence)	Needs survey	Unmet housing and service needs
United Healthcare	Health care provider (QP1,2,3,4)	Needs survey	Unmet housing and service needs
United Methodist Children's Services (UMCS)	Community-based Organization (QP1,2,4)	Needs survey Focus group Correspondence	Unmet housing and service needs
Urban Economic Development Association of Wisconsin (UEDA) membership network	General public, community and economic development practitioners	Needs survey	Shared survey link, provided outreach
Vivent Health	Community-based Organization (QP4)	Needs survey	Unmet housing and service needs

The HOME-ARP needs survey was distributed widely through various housing networks (Continuum of Care, UEDA, Make It Work Milwaukee Coalition/Mental Health Task Force, etc.). We received 43 responses, mostly from service provider representatives, but it also included people from the broader community. We also conducted a number of virtual meetings with CoC members, local developers, and service providers that assist people in specific Qualifying Populations.

Participants were asked to identify the needs for each Qualifying Population, needs related more broadly to housing insecurity, and to prioritize the eligible project activities. Summaries of responses are provided in the Needs Assessment and Gaps Analysis section, providing additional context to the quantitative data collected. Links to the survey summary data are also included in Appendix D, Public Participation.

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

The public engagement process started with the development of the needs survey and initial consultation with Milwaukee Continuum of Care (CoC) members. UEDA developed a slide deck that provides an overview of the HOME-ARP Allocation funds, the elements that must be included in the Allocation Plan, and the process to develop the plan. This file is available to the public and was widely shared as part of the needs survey outreach. It is also included in Appendix D, Public Participation. The survey was open from August 31-October 13, 2022.

A draft allocation plan was developed using both quantitative and qualitative data collected from various sources as outlined in the Consultation section. It was posted for public comment on the City of Milwaukee website (www.city.milwaukee.gov/CDGA). The notification describes the contents and purpose of the plan and states that copies of the plan will be available for review on the City's website and at the offices of CDGA. Physical copies were also available upon request.

- ***Date(s) of public notice:*** March 3, 2023
- ***Public comment period:*** March 3 - March 20, 2023
- ***Date(s) of public hearing:***
 - Wednesday, March 8th at 1:30pm - City of Milwaukee Community & Economic Development Committee (Access Committee information [on Legistar](#))
 - Wednesday, March 15th at Noon (Community hearing - virtual) [Register here>>](#)

Describe the public participation process:

The City of Milwaukee, in partnership with UEDA, utilized a variety of engagement tools, including outreach methods such as a survey tool, group meetings, electronic communication, social media, and the City's E-Notify system throughout the development of the allocation plan (August-December 2022).

The survey tool was developed so participants could identify and prioritize community needs and share their feedback. Responses were compiled in such a way as to assist CDGA in lifting up key needs and connecting them to the allocation plan goals.

CDGA presented the plan to the City of Milwaukee Common Council Community & Economic Development (CED) Committee on March 8, 2023 and held a community hearing (virtual) on March 15, 2023. CDGA and UEDA staff provided an overview of the draft Allocation Plan, including the purpose of the funds, overview of unmet needs and housing gaps, and proposed funding allocations by eligible activity.

Comments could be submitted during the hearings or via the City's Legistar system using the link shared on the CDGA website page or by emailing comments to CDGAReports@milwaukee.gov with the subject "HOME-ARP Comment."

Along with the City of Milwaukee, UEDA promoted the availability of the Plan for public comment and public hearing dates to its network and all consulting agencies at the start of the public comment period. UEDA and CDGA staff also presented the plan to Milwaukee Continuum of Care Leadership and Steering Committee groups.

Describe efforts to broaden public participation:

UEDA also worked with CDGA staff and CoC members to identify groups and service providers to specifically include in outreach for the survey or to meet with to ensure that the process included groups that serve all four Qualifying Populations, and utilized its network to reach residents and people that may not be affiliated with a service provider. UEDA and CDGA also convened multiple focus groups with various stakeholders to gain clearer insight into the housing and service needs of the Qualifying Populations.

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. The City of Milwaukee includes notification of how to request accommodations for persons with disabilities via meeting agendas and the E-Notify system.

Summarize the comments and recommendations received through the public participation process either in writing or orally at a public hearing:

Below is a summary of comments and discussion at three public participation meetings held for the City of Milwaukee HOME-ARP Allocation plan.

City of Milwaukee Common Council: Community & Economic Development Committee

Wednesday, March 8, 2023 | 1:30pm

The meeting could be attended in person or virtually.

View meeting agenda, materials and videos at http://milwaukee.granicus.com/ViewPublisher.php?view_id=2

Attendees: Five Alderpersons, three City staff person, and six community members joined the meeting. Steven Mahan of Community Development Grants Administration and Kristi Luzar from Urban Economic Development Association of Wisconsin (UEDA) were at the meeting to present the City's HOME-ARP Allocation Plan, answer questions, and receive feedback.

Comments and questions included:

- The need for housing for families (particularly women and children).
- These funds are an opportunity to provide a "Housing First" approach for victims of sex trafficking, which impacts a few aldermanic districts more significantly. Access to safe housing for victims has been a challenge.
- The possibility of providing legal assistance to people as part of broader services.
- The need for funding support to affordable housing developments that are still trying to recoup lost rental income due to tenants' inability to pay rent because of the impacts of the pandemic.

Milwaukee Continuum of Care Leadership Team: Presentation of HOME-ARP Allocation Plan

Thursday, March 9, 2023 | 9:00am

The meeting was held virtually and had 27 attendees.

Comments and questions included:

- These funds are an opportunity to use supportive services for prevention and case management for people who fall into qualifying population four, i.e. those at the greatest risk of housing instability or to prevent homelessness.
- Let's make sure we invest in people who fall in "category 1.5" – this would allow service providers to work upstream with preventative approaches (not normally able to do that). These funds can be used for people who are precariously housed.

City of Milwaukee Public Hearing

Wednesday, March 15, 2023 | Noon-1:00pm

The hearing was held virtually and facilitated by UEDA. CDGA attended to answer questions.

Five people registered, two attended.

Comments and questions included:

- For the Consultation table, please indicate that Pathfinders works with people in trafficking situations.
- The data from the City on significant cost burden helps quantify the gaps for households that are very low-income or extremely low-income.
- There was discussion about the allocation percentages and how the use of the funds could be adjusted throughout the grant period if community needs change.
- Suggestion to more clearly explain the Gaps Analysis chart (pages 27-28) as it draws data from the Point In Time data that is a snapshot so draws an incomplete picture of current shelter capacity. Shelters are still not operating at full capacity and some people are reluctant to enter into congregate settings.

Summarize any comments or recommendations not accepted and state the reasons why:

All comments on the HOME-ARP Allocation Plan are accepted, considered in the Plan, and included with the final submission of the Plan to HUD.

Needs Assessment and Gaps Analysis

The HOME-ARP funds are designed to primarily target the needs of individuals and families from the following groups or qualifying populations (QPs) as defined in 24 CFR 91.5:

1. **Homeless:** (1) Lacks a fixed, regular, and adequate nighttime residence; (2) Will imminently lose their primary nighttime residence; or (3) Unaccompanied youth under 25 years of age who do not otherwise qualify.
2. **At risk of homelessness:** Has an annual income below 30% of median family income for the area; Does not have sufficient resources or support networks; Meets one of a number of other conditions as described in 24 CFR 91.5.
3. **Fleeing (or attempting to flee) domestic violence, dating violence, sexual assault, stalking, or human trafficking** where there is reasonable belief of a threat of imminent harm or other situations as defined in 24 CFR 5.2003 and the Trafficking Victims Protection Act of 2000.
4. **Other Populations requiring services or housing assistance to prevent homelessness OR at greatest risk of housing instability and who do not qualify under any of the three criteria above but meet one of the following:**
 - a. Households that have previously been qualified as “homeless” as defined in 24 CFR 91.5 and are currently housed due to temporary or emergency assistance and need additional housing/supportive services to avoid a return to homelessness.
 - b. Has an annual income that is less than or equal to 30% of the area median income (AMI) and is experiencing a severe cost burden (paying more than 50% of monthly household income towards housing costs).
 - c. Has an annual income that is less than or equal to 50% of the AMI AND meets one of the conditions for “at risk of homelessness” as defined above.

Additionally, **veterans and families that include a veteran family member** that meet the criteria for one of the QPs are eligible for HOME-ARP assistance.

This section examines the size and demographic composition of the four qualifying populations, assesses unmet housing and service needs, describes the resources available, and identifies gaps in the service delivery system.

Demographic & Program Data

The City of Milwaukee is the largest city in Wisconsin, with a current estimated population of 577,235, per US Census Bureau. Following several decades of population decline corresponding to a decline in the city’s manufacturing sector as well as the outmigration of white families to suburban areas in the region, the city’s overall population has been relatively stable since 2000, with an average household size of about 2.5 persons per household, similar to the metro area (City of Milwaukee 2022 Housing Affordability Report).

While the city as a whole is among the most diverse in the nation by some measures, there are many neighborhoods that are highly segregated where more than 90% of residents are persons of color. Many of these neighborhoods, especially on Milwaukee’s north side, are losing population which has an impact on housing demand. Milwaukee’s continued standing as one of the most segregated cities and metro areas in the country and the legacy of past “redlining” practices continue to manifest in deep racial and economic inequalities.

One of the primary market drivers in the City of Milwaukee is the decline of median household income in the City over the last two decades. The continuing economic impacts of COVID-19 on low-income residents in particular cannot be overstated.

There continues to be a great need for affordable housing units in the City of Milwaukee, particularly for those that are paying more than 30-50% of their income towards housing. Cost burden also disproportionately affects communities of color and people with disabilities in the City. In the City's 2022 Housing Affordability Report, rental vacancy rates in the city were 6.3%. However, more recent anecdotal data from members of the Apartment Association of Southeastern Wisconsin noted that vacancy rates were closer to 2-3%. Analysts consider Milwaukee to be one of the most competitive rental markets in 2022. This coincides with feedback from service providers whose clients struggle to find available housing and the trend of rising rents is putting additional financial stress on renters.

Other problems that continue to lead to greater housing instability for residents include a significant number of older housing units, lack of resources for housing maintenance and repairs, dislocation of residents due to rising rents and eviction, lead-based hazards, loss of affordable rental units, and potential opposition to affordable housing development.

Households Experiencing Homelessness

According to the 2021 Milwaukee HMIS ESG CAPER report, 16,150 people received services for a homelessness experience and are

- Mostly adults or age 18 or older (72%), with the majority (or 64%) ages 25-54. About 28% were under the age of 17.
- 69% are Black/African American, with those identifying as White at 23%, and those identifying as Hispanic/Latino at 9%.
- About 55% identify as male, 44% as female, and less than 1% as transgender or gender nonconforming.
- 1,562 people (nearly 10%) are categorized as chronically homeless.
- Nearly 5% (or 781) are Veterans.
- About 32% of the people receiving services were in Emergency Shelters, Transitional Housing or Street Outreach, and Safe Haven.
- Another 17% received Rapid Re-Housing or Permanent Supportive Housing services.
- Out of a total of 11,051 households, there were 1,511 households with children and adults (13.6%), and 280 households (2.5%) comprised of only children.

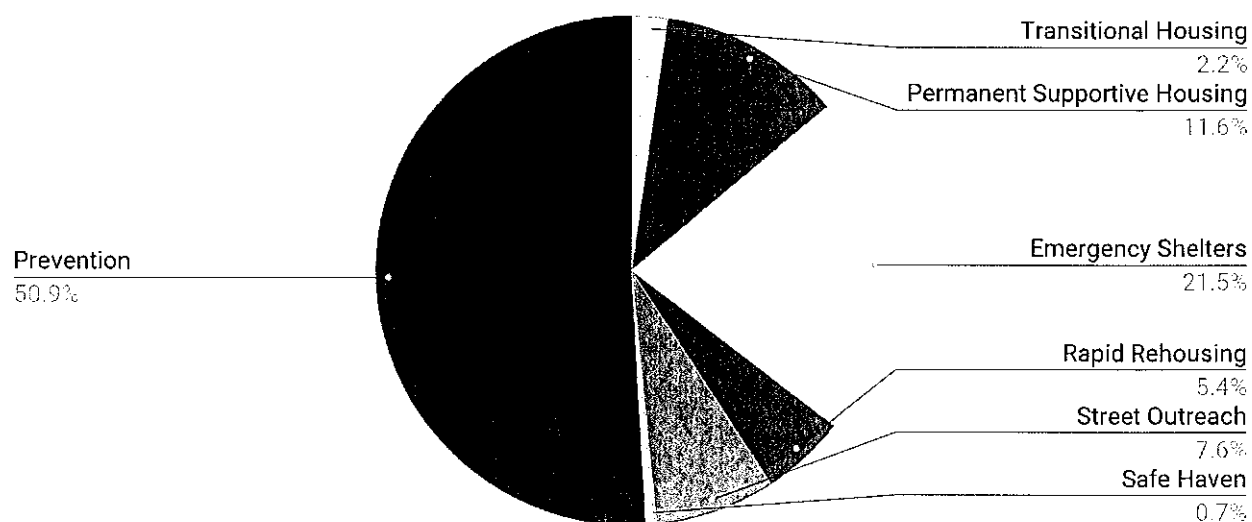
HUD defines four categories of homelessness, with Category 1 (literally homeless) aligned with this qualifying population. Coordinated Entry data through mid-November 2022 showed that 1,083 requests for assistance had been received and 37% were Category 1, with 68% (277) of them being singles versus families.

The following tables and charts show the program and demographic data for all people receiving services by the Milwaukee Continuum of Care related to a homelessness experience.

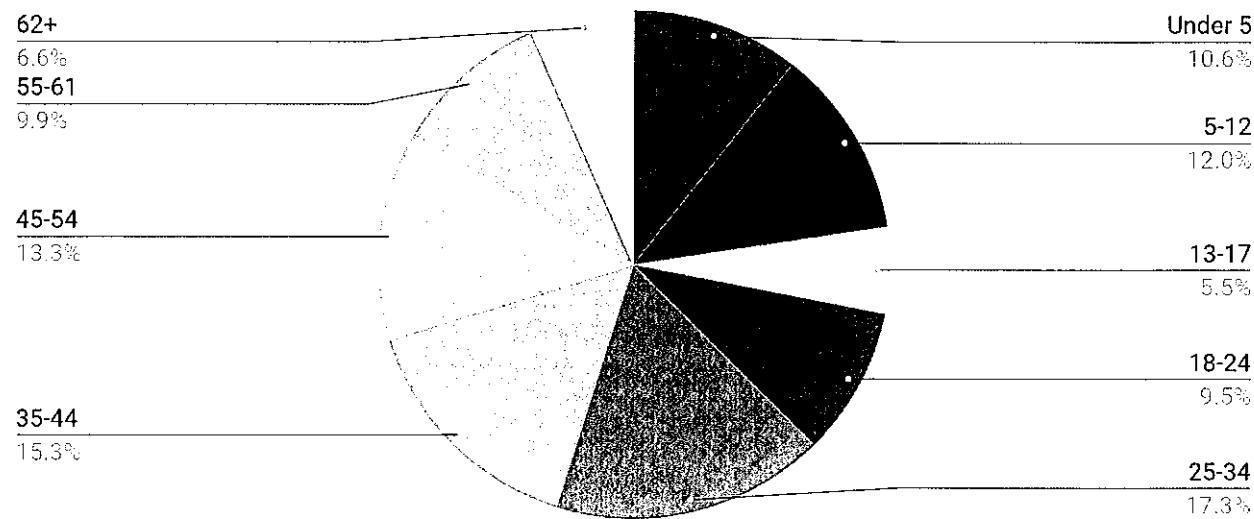
Number of Clients Served by Program

Program	Numbers of Persons served	Adults	Under 18	Number of Adult Head of Household	Number of Veterans	Number of Chronically Homeless
<i>Totals</i>	16,150	11,558	4,514	10,740	781	1,562
Transitional Housing	360	235	125	215	175	19
Permanent Supportive Housing	1,881	1,517	362	1,421	217	724
Emergency Shelters	3,471	2,679	791	2,586	108	253
Rapid Rehousing	871	422	449	339	85	80
Street Outreach	1,235	1,088	127	1,020	34	120
Safe Haven	108	108	0	108	2	24
Prevention	8,224	5,509	2,660	5,051	160	342

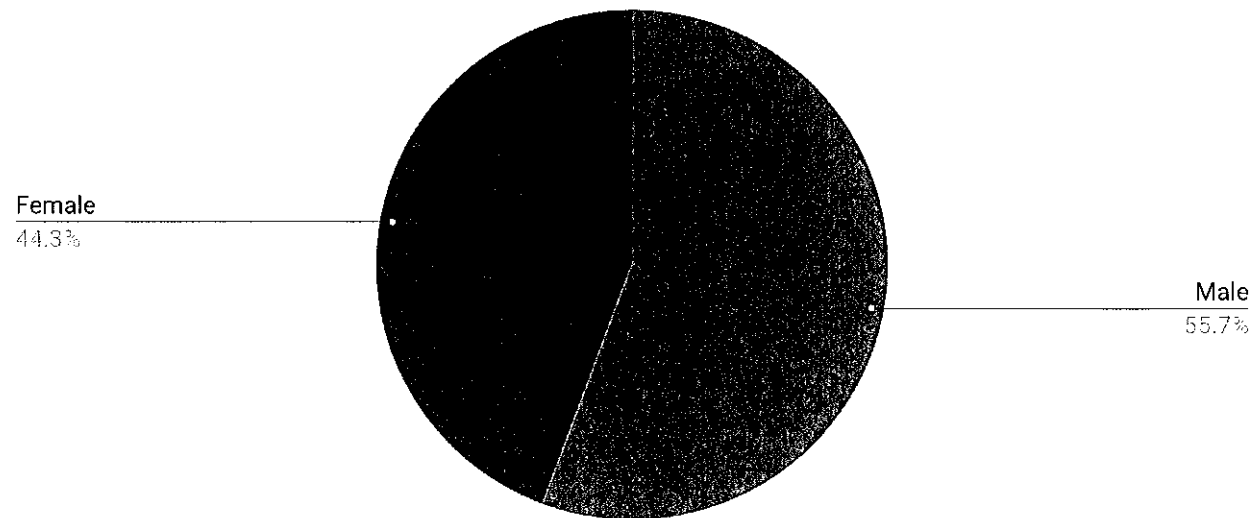
SOURCE: Milwaukee HMIS 2021 Emergency Solutions Grant (ESG) Consolidated Annual Performance Evaluation Report (CAPER) for 1/1/2021 to 12/31/2021



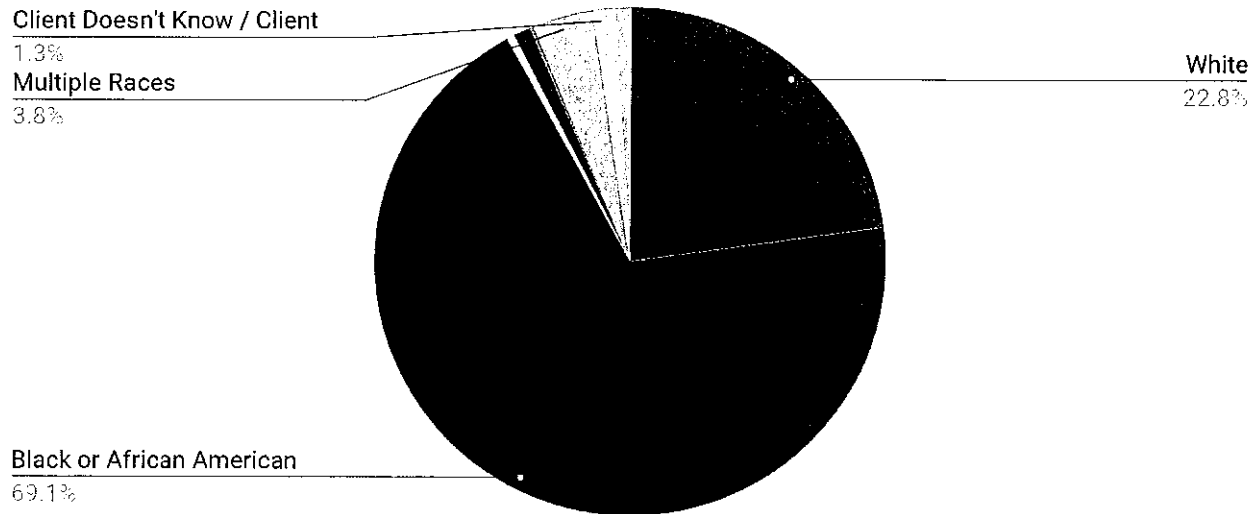
Age of Clients Served



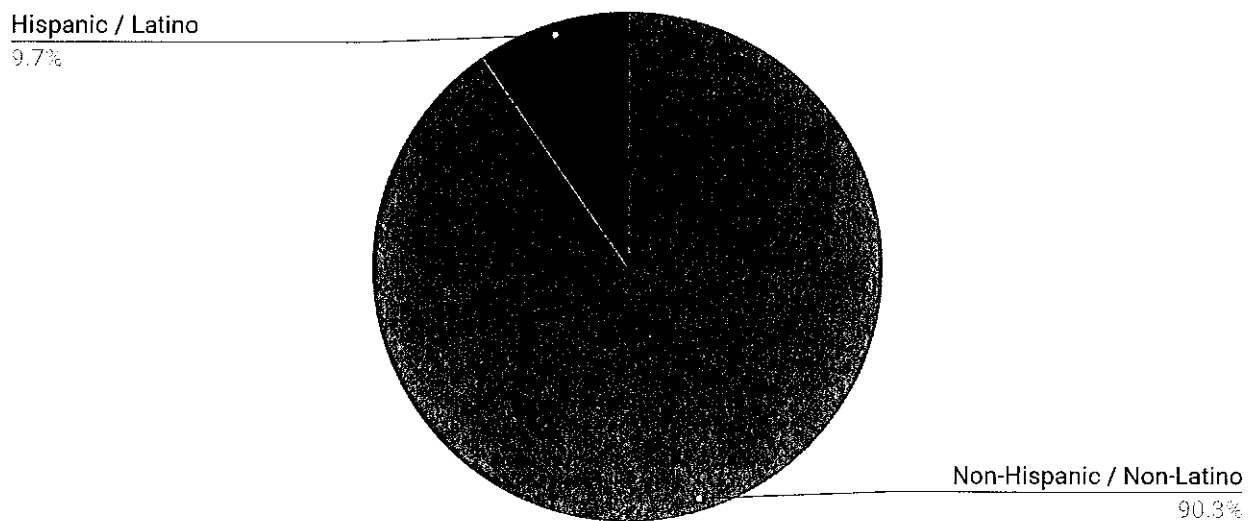
Gender of Adults Served



Race of Clients Served



Ethnicity of Clients Served

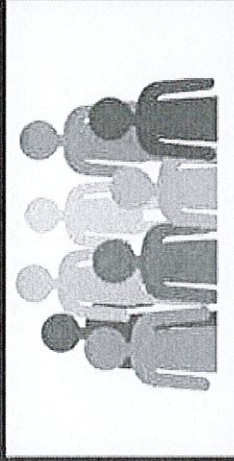
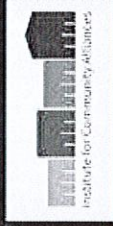


Point In Time (PIT) Count Data

The following two pages show graphic overviews of recent Milwaukee Continuum of Care PIT counts. They include a snapshot of the PIT from January 26, 2022, and the data from 2020 - 2022, which show that 832 people were experiencing homelessness, the majority of them being Black/African-American, male, single households.



Milwaukee CoC Point in Time – January 26, 2022



People Experiencing Homelessness
832

24% of persons experiencing homelessness reported a serious mental illness that would impact their ability to maintain housing or employment.

During the night of PIT, there were:

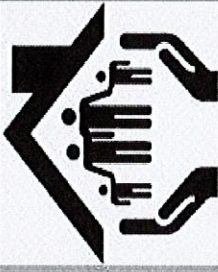
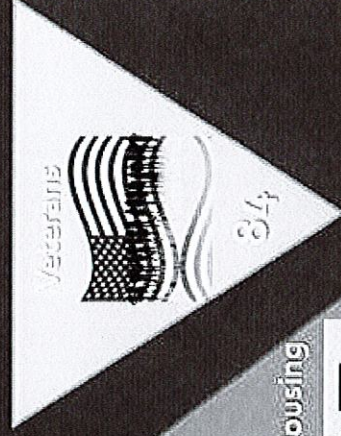
577 Single Households

72 Families

4 Unaccompanied Youth

Race	Totals
American Indian, Alaska Native, or Indigenous	10
Asian or Asian American	2
Black, African American, or African	537
Native Hawaiian or Pacific Islander	1
White	278
Multiple Races	22

****Despite the pandemic, Milwaukee was able to conduct a thorough unsheltered count that resulted in a 21% decrease since 2020.**



Current Housing	Count
Emergency Shelter	663
Transitional Housing	108
Safe Haven	43
Unsheltered	18

At Risk of Homelessness

Generally, households that are lower income (at 50% of Area Median Income or less) and severely housing cost-burdened (paying more than 50% of their income towards housing) are at high risk to experience homelessness. Additionally, these households often do not have support networks or other resources that can prevent them from moving into emergency shelter.

The City of Milwaukee Area Median Income (AMI) in 2021 was \$45,318 and the number of persons in poverty was 24%. According to the [City of Milwaukee's 2022 Housing Affordability Report](#) about 55,800 renter households have an annual household income of \$35,000 or less and are housing cost-burdened. This is about 41% of all renter households.

HUD Category 2 Homeless Definition (imminent risk of homelessness) is aligned with this qualifying population. Milwaukee CoC Coordinated Entry data through mid-November 2022 showed that of the 1,083 requests for assistance received, 21% were Category 2, with 76% (227) being singles versus families.

Additionally, Milwaukee CoC members are seeing increasing numbers of families and other households that do not fit the HUD Definitions for Category 1 or 2, but are at a high risk to lose their primary residence. For example, they are rather transient, either staying in places not meant for human habitation or with family and friends, etc. These families are difficult for outreach and prevention workers to not only locate to connect with shelter and services, but to also stay in regular contact with.

Housing Costs

Housing cost burden (spending at least 30% of one's income on housing) is a major factor in terms of housing stability and the risk of experiencing homelessness.

The following table from the City's 2022 Housing Affordability Report shows that of the households earning less than \$20,000 per year, about 78% were considered "severely" cost-burdened, spending 50% or more of their income on housing. For renter households earning between \$20,000 to \$34,999 per year, about 83% were cost-burdened, with 25% considered severely cost burdened.

Table 2: Renter Households Experiencing Housing Cost Burden, 2021

Households by Income	Households that Spend Less than 30% of Annual Income on Housing (Not Housing Cost Burdened)	Households that Spend Between 30% and 49.9% of Annual Income on Housing (Housing Cost Burdened)	Households that Spend 50% or More of Annual Income on Housing (Severe Housing Cost Burdened)
Less than \$20,000	9.4%	12.7%	77.9%
\$20,000 to \$34,999	16.9%	57.7%	25.4%
\$35,000 to \$49,999	64.3%	33.3%	2.1%
\$50,000 to \$74,999	90.6%	8.8%	0.6%
\$75,000 or Greater	97.6%	2.1%	2.3%

Source: 2021 5 Year ACS, Table B25074 Household Income by Gross Rent as a Percentage of Household Income in the Past 12 Months

Note: Data is based on the population of households where Housing Cost Burdened was determined. Census data indicates that, of the estimated 135,675 households, housing cost burden data for approximately 8,000 households could not be computed; of these, the vast majority (5,800 households) earned less than \$20,000 per year.

Housing Condition

Over 42% of Milwaukee's housing was built before 1940 and is located in the central city. Another 32% of the housing stock was built between 1940 and 1959; much of this is located in the northwest side and far south side of the city. Most of the newer housing stock is located towards the far edges of the city, with the exception of newer condo and multi-family development downtown, and infill single-family homes that have been developed in recent decades.

Some of the oldest housing stock in the city is located in Census tracts with the highest concentrations of households earning less than \$25,000 per year. Much of the older housing stock in the city is also in need of repair, particularly in neighborhoods with high percentages of low-income households and absentee landlords.

Evictions & Housing Insecurity

The loss of tenant protections in recent years has led to decreasing housing stability for many residents at risk of eviction, either because of affordability or poor conditions. Evictions often exacerbate and even cause poverty by making it difficult to impossible for tenants with lower incomes to find safe, decent housing in the future.

According to the City's 2022 Housing Affordability Report, in 2021, there were approximately 7,200 eviction notices filed in Milwaukee. Between 2016 and 2020 (the year an eviction moratorium was put in place due to the COVID-19 pandemic), the City averaged about 12,600 eviction filings per year. Most eviction actions are concentrated in neighborhoods on Milwaukee's northside and/or central core neighborhoods, which tend to have a higher concentration of Black households and higher rates of poverty.

The City of Milwaukee 2020-2024 HUD Consolidated Plan included information from Milwaukee Public Schools (MPS), which tracks students that are at risk for homelessness or experiencing housing insecurity. In the 2018-2019 school year, they identified 5,270 students at risk or about 6.95% out of a total enrollment of 75,081 students. MPS has a Homeless Education Program, which works to connect families to needed resources should they experience housing insecurity; their identification rate is 6%+ higher than the national average. One of the strongest tools they have to identify need is when a family requests out-of-region transportation to get to school when their housing situation changes.

These various data points align with feedback from the CoC and data from the 2022 City of Milwaukee Housing Affordability Report, which brings to light the shortage of affordable housing for families in the City and the difficulty in finding shelter and/or a permanent housing destination, leading to increased risk for homelessness.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Recent, quantitative data sources specific to the City of Milwaukee related to this qualifying population are not readily available. Most of the data collected related to victims of domestic violence (DV), intimate partner violence (IPV), sexual assault, or human trafficking available is on a county or statewide basis. The most consistent, localized source is the Milwaukee CoC's HMIS database.

However, the Milwaukee Homicide Review Commission's most recent report (2020) utilized data from the City of Milwaukee Police Department and noted that the percentage of combined DV/IPC homicides and shootings has increased significantly starting in 2019, indicating an increasing need to provide safe, stable housing and services to DV/IPV victims to prevent further violent outcomes.

The Milwaukee CoC Annual Performance Report for the 10/1/2021 to 9/30/2022 Federal fiscal year showed that 2,713 victims of domestic violence received services out of 9,341 households (29%). Of these 386 households (14%) received emergency shelter and 55% of people received Prevention services with the rest receiving transitional housing, safe haven, or street outreach services or placements in rapid rehousing or permanent supportive housing.

HUD Category 4 Homeless Definition (fleeing/attempting to flee domestic violence) is aligned with this qualifying population. The Coordinated Entry data through mid-November 2022 showed that of the 1,083 requests for assistance received, 42% were Category 4, with 61% (278) being singles versus families. Additionally, 35% (160) of Category 4 referrals were also Category 1 (literally homeless).

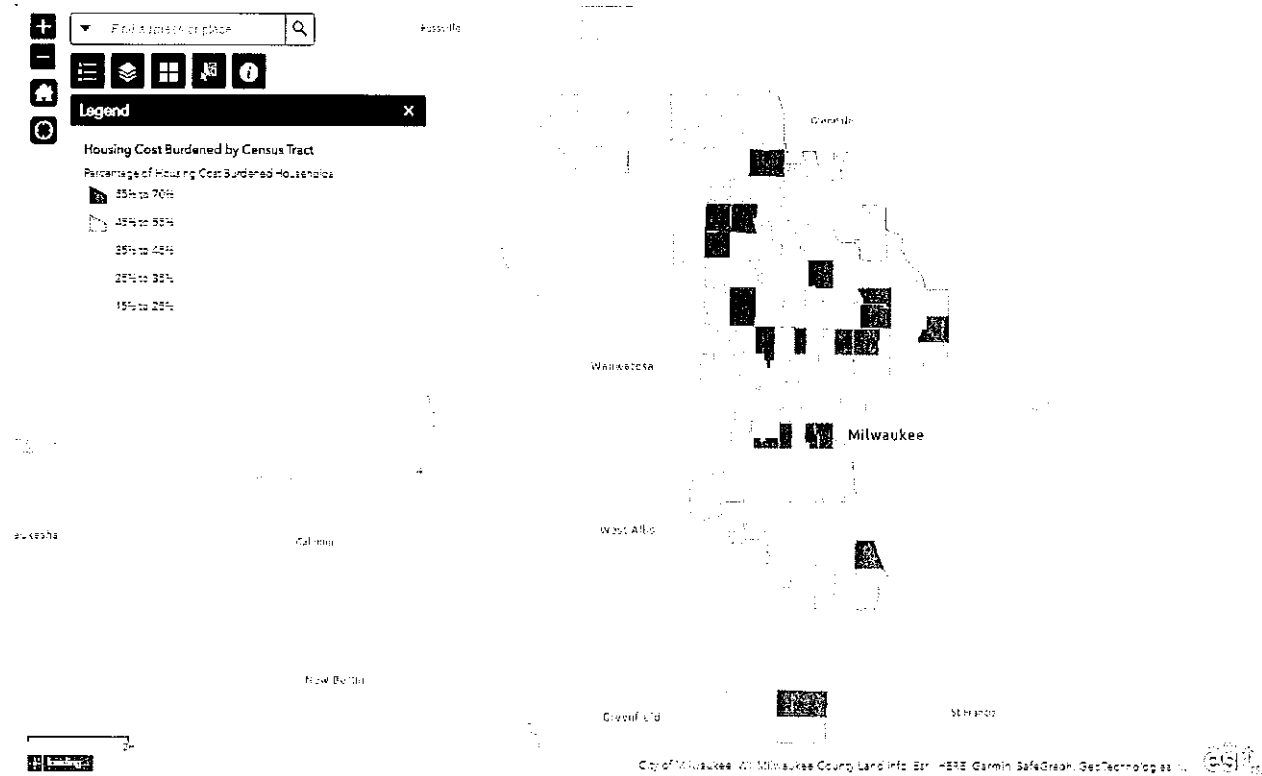
A recent report from Sojourner, a local organization that provides domestic violence-related services, sought to measure the economic impact of domestic violence in Milwaukee County and the State of Wisconsin. The study estimated the annual number of intimate partner violence victims in Milwaukee County to be 9,236. It also noted that since 2018 domestic violence-related crimes have increased dramatically and that victims experience significant economic disruption through loss of work and wages, the need for physical and mental health care, legal costs, property loss, and more - all putting them at greater risk of housing insecurity.

Additionally, the City's consultation process included survey feedback and interviews with community-based organizations that specifically serve those fleeing a human trafficking situation (Exploit No More, Franciscan Peacemakers, Pathfinders). While recent quantitative data for this population is difficult to track, a report released in 2018 showed that 340 people were confirmed or believed to have been victims of sex trafficking in Milwaukee between January 2013 - December 2016. These victims were aged 25 and younger, 97% were female, and 65% were African American (*Milwaukee Journal Sentinel*, 3/1/18 - see report link in Appendix A).

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

There are many households that may be at great risk for housing stability but do not qualify as homeless in any of the HUD Category definitions. As described earlier, lower-income households that pay more of their income towards housing (i.e. cost-burdened) are at significant risk for housing instability and of not being able to meet their other basic household needs. According to the City's 2022 Housing Affordability Report, in 2021, the number and percentage of city households spending 30% or more of their income on housing was about 95,900 (about 42% of all households).

Map 5: Housing Cost Burdened, 2021



Lower-income households and households of persons of color tend to be disproportionately affected by housing cost burden, not only paying disproportionately high percentages of income towards rent, but also having lower homeownership rates, greater risk of foreclosure, and facing higher eviction rates putting them at risk of losing their housing.

The following table from the City's 2022 Housing Affordability Report shows the differences in housing cost burden between owners and renters by income level. Most households experiencing cost burdens are renters. In 2021, there were 64,070 renter households earning less than \$35,000 per year in Milwaukee, of which 55,835 (87%) were experiencing a housing cost burden. This indicates that there are far too few rental units that are appropriately priced or available for these households.

Table 3: Housing Cost Burden By Income and Housing Type, 2021

Housing Cost Burdened Household Income	Total Occupied Housing		Owner Occupied Housing		Renter Occupied Housing	
	Number	Percent	Number	Percent	Number	Percent
Less than \$20,000	38,888	16.9%	7,432	7.9%	31,456	23.2%
\$20,000 to \$34,999	31,135	13.6%	6,756	7.2%	24,379	18.0%
\$35,000 to \$49,999	12,435	5.4%	5,276	5.6%	7,159	5.3%
\$50,000 to \$74,999	5,579	2.4%	3,528	3.8%	2,051	1.5%
\$75,000 or more	1,788	0.8%	1,279	1.4%	509	0.4%
Zero or Negative Income	6,083	2.7%	1,278	1.4%	4,805	3.5%
Total Cost Burdened	95,908	41.8%	25,549	11.1%	70,359	30.7%

Not Cost Burdened Household Income	Total Occupied Housing		Owner Occupied Housing		Renter Occupied Housing	
	Number	Percent	Number	Percent	Number	Percent
Less than \$20,000	3,829	1.7%	565	0.2%	3,264	1.4%
\$20,000 to \$34,999	9,087	4.0%	4,116	1.8%	4,971	2.2%
\$35,000 to \$49,999	20,502	8.9%	7,478	3.3%	13,024	5.7%
\$50,000 to \$74,999	34,987	15.2%	15,253	6.6%	19,734	8.6%
\$75,000 or more	61,885	27.0%	40,834	17.8%	21,051	9.2%
No Cash Rent	3,272	1.4%	--	--	3,272	1.4%
Total Not Cost Burdened	133,562	58.2%	68,246	29.7%	65,316	28.5%

Total Households	229,470	100.0%	93,795	40.9%	135,675	59.1%
-------------------------	----------------	---------------	---------------	--------------	----------------	--------------

Source: 2021 5 Year ACS, Table S2503 Financial Characteristics

Non-Homeless Special Needs

The City of Milwaukee 2020-2024 HUD Consolidated Plan included information about specific groups in our community that have special needs that impact their economic and housing stability. They include Seniors or Older Adults, Veterans, People with Disabilities, Formerly Incarcerated Individuals, and Immigrants/Refugees. These groups, in particular, often require both housing assistance and supportive services.

Rising rents are of great concern to older adults, and the City currently has about 39,000 older adults that will either need to age in place or find appropriate housing. These renters have difficulty accessing safe, affordable housing options, often live in places that are inaccessible, and have limited resources with their fixed incomes.

The Milwaukee CoC Annual Performance Report for the 10/1/2021 to 9/30/2022 Federal fiscal year showed that 1,401 Veterans received services out of 9,341 households (15%). Of these 111 households (8%) received emergency shelter, street outreach or safe haven services and 15% of people received Prevention services. The majority (948 or 68%) received permanent supportive or transitional housing placements, as the Housing Authority of the City of Milwaukee (HACM) has increased the number of Veterans Affairs Supportive Housing (VASH) housing vouchers in recent years.

According to the National Disability Institute (NDI), 12.6% of the City of Milwaukee's population has a disability. Among those working, 63% of workers with disabilities are earning less than \$25,000, and 37% of households with a person with a disability pay more than 50% of their income for housing. People with disabilities experience a higher rate of severe housing cost burden and there is a shortage of accessible units both in the private market and in public housing.

Formerly incarcerated individuals face serious barriers in terms of obtaining housing once they return to their communities. For example, most landlords perform credit checks, charge up-front application fees and high-security deposits, ask for personal and professional references, and require applicants to indicate their criminal history on applications in order to be considered for a rental unit. Any of these practices can disqualify an individual who has spent time in prison, away from the community and employment market, from successfully qualifying for housing. This list of barriers forces many formerly incarcerated individuals to live in hotels or motels, just steps from homelessness.

Lastly, in August-September 2022 the City of Milwaukee conducted a needs survey as part of its Consultation process for the HOME-ARP Allocation Plan. The survey tool was distributed to a broad network of community and economic development practitioners and targeted to CoC service providers; 43 responses were received.

Respondents were asked *“Are there specific groups you would describe as being at greatest risk of housing instability or requiring housing assistance?”* Below is a summary of responses:

- Fixed income households, especially those that do not receive rental assistance, seniors, or single parents with children.
- Victims of domestic violence or sex trafficking.
- People with a challenging rental history, i.e. evictions.
- Individuals with mental health issues or substance use needs that are seeking recovery.
- People returning from incarceration or are justice-involved.
- Individuals that need support after incidents of violence that targets their home or community, especially in instances where minor children are the immediate victim, witnessed the incident, and/or reside in the home which was a target.
- Families with children that are struggling with increasing costs for child care, food, and housing.
- People with intellectual, developmental, and/or physical disabilities.
- LGBTQ young adults, BIPOC trans people of all ages.
- Low-income renters that are subjected to substandard living and physical housing conditions.
- Fixed income homeowners.

Available Resources

This section describes the resources available to people who are experiencing housing insecurity and/or meet the definition of one of the four Qualifying Populations (QPs).

Homelessness Services

The City of Milwaukee and Milwaukee County Continuum of Care (CoC) programs and other service providers pursue seven critical efforts that connect people to available resources and help shorten the duration of homelessness:

1. Implement Homeless Prevention services.
2. Outreach to engage people experiencing homelessness who are on the street.
3. Assessment of emergency and transitional housing capacities to safely house people.
4. Transition people to permanent housing opportunities with supportive or case management services.

In particular, outreach efforts and Coordinated Entry are the foundation. Coordinated Entry manages the prioritization of referrals to shelter, permanent housing programs, and homelessness prevention funded by CoC

and ESG. Linking people at imminent risk of homelessness with resources to sustain permanent housing in the community is a critical component of an early intervention system.

Outreach workers engage homeless people on the street, in parks, under bridges, encampments, and abandoned buildings and provide food, clothing, and personal care items as immediate assistance and connect them to services such as access to shelter, benefits assistance, substance abuse services, HIV testing, and longer-term housing options. They collaborate with other community-based service providers and law enforcement.

Appendix B includes a list of agencies that interact with the homeless services system. Because of the unique nature of each homeless service provider, there is variability in the nature and level of services provided beyond the provision of shelter/housing. Many also provide services specifically for special needs populations.

Below is the **Housing Inventory Chart** prepared by the Milwaukee CoC's HMIS service provider (ICA). Note this includes data from the Point-In-Time (PIC) count, which is a snapshot and may not provide a complete picture of current system capacity and needs.

	Current Inventory					Homeless Population			
	Family		Adults Only		Veterans	Family HH (at least 1 child)	Adult HH (w/o child)	Veterans	Victims of DV
	# of Beds	# of Units	# of Beds	# of Units	# of Beds				
Transitional Housing	61	22	118	69	69	266	234	194	46
Permanent Supportive Housing	405	120	1589	1589	505	683	1852	754	265
Emergency Shelters (Sheltered Homeless)	292	86	465	457	0	949	1680**	68	386
Rapid Re-Housing	152	54	96	87	170	741	471	130	195
Street Outreach						67	1526	41	310
Safe Haven	0	0	47	47	0	0	109	2	5
Prevention						4146	5195	212	1506
Unsheltered Homeless						0	18	0	1

Data Source: Housing Inventory Chart (September 2022 HIC), Annual Performance Reports (10/1/2021 to 9/30/2022 - Federal Fiscal Year), WI-510 Milwaukee City & County CoC Point-In-Time Data from 1/26/22.

***There were also 251 Unaccompanied children (under 18, i.e. children-only households) in Emergency Shelter.*

While emergency shelter and transitional housing are resources for individuals and families in greatest need who have no other housing option in the community, there is a focus on creating access to more permanent housing so individuals experiencing homelessness can be transitioned more quickly out of shelters, which allows the current number of shelter beds to serve more people.

Additionally, Rapid Re-Housing (RRH) is a strategy that has increased over the years to reduce the reliance on emergency shelter and transitional housing and increase successful placement in permanent unsubsidized or supportive housing in the community. RRH includes case management, and rent assistance (per the HUD definition) and was implemented starting in 2015. Before this time, case management and rent assistance had

been provided as separate programs. It is considered a leading strategy to get individuals and families stably housed quickly, with some case management.

Over time the Milwaukee CoC has increased its capacity to develop new permanent supportive housing, including units for specific groups such as veterans, youth aging out of foster care, victims of trafficking or exploitation, etc.

As a result of lessons learned as part of the Milwaukee CoC's COVID-19 public health pandemic response, members are focused on strengthening and increasing the number of non-congregant shelter units that are available to quickly house people at risk of losing their housing. The CoC has added a handful of hotels to its inventory to meet this increasing demand.

Domestic Violence, Intimate Partner Violence, Sexual Assault, Human Trafficking

The City of Milwaukee is a participant in a handful of collaborative initiatives or task forces that have been established to work on these issues and coordinate services/resources for people experiencing the impact of these issues. These efforts include the Continuum of Care, Human Trafficking Task Force of Greater Milwaukee, and Milwaukee Homicide Review Commission which work in partnership with health care providers as well.

As part of the plan's consultation, the City also connected with a number of community-based organizations that provide targeted services to victims of domestic violence and/or human trafficking which provide opportunities for potential pilot projects related to housing and services.

Public Housing Units

The Housing Authority of the City of Milwaukee (HACM) manages nearly 3,800 subsidized housing units through their housing developments, which includes just over 2,600 public housing units, 940 project-based voucher units, 165 units under low-income housing tax credits, and 26 market-rate units. The specific developments of Northlawn, Southlawn, and Berryland contain another 977 units of unsubsidized affordable housing that are rented at 90% of market rents.

In addition, the Housing Authority's Housing Choice Voucher program has just over 5,800 Section 8 Housing Choice vouchers under contract at this time. About 78% of the vouchers provide Tenant Based Rent Assistance (TBRA), 22% are project-based vouchers, and the remaining 5% are for the Veterans Affairs Supportive Housing (VASH) or Family Unification programs.

HACM provides critical housing services to individuals and families that have extremely low annual household incomes. The average annual income for public housing residents and voucher recipients is around \$15,000. They also serve over 1,300 families that include a person(s) with disabilities in public housing and support an additional 2,200+ families with a person(s) with disabilities with housing vouchers. Lastly, just over 800 older adults reside HACM housing developments and about 1,000 older adults receive voucher assistance.

Appendix C includes a full list of the public housing and low-income housing tax credit developments managed by HACM.

Temporary Rent Assistance

The City of Milwaukee offers a Tenant-Based Rent Assistance (TBRA) program via HOME and ESG funds, which is administered by community-based organizations and provides a variety of services related to temporary rent

assistance. In addition to providing financial assistance for people at risk of losing their housing, it also includes a rent-withholding program that allows renters living in units with expired code repair orders to pay rent into a city-held account until repairs are made and ensures that identified code violations on rental properties are addressed. The program also provides renters with emergency relocation from condemned properties and emergency shelter when necessary. Rental proceeds may be used for repairs related to the health, safety, and welfare of tenants.

Additionally, the City has made effective use of temporary rent assistance funds allocated by the Federal government via the CARES Act and American Rescue Plan Act. Emergency Rent Assistance (ERA) funds are still in active use by the City and County. Each jurisdiction contracts with a separate community-based organization to manage the ERA application and distribution process, and there is active coordination to ensure assistance is provided to as many people as possible and does not overlap. For example, as the City of Milwaukee's community partner, the Social Development Commission (SDC) distributed \$44.37 million in temporary rent assistance to over 10,100 households from mid-2020 to early March 2022. ERA2 funds continue to be a resource available to assist people with economic hardship.

Rental Housing Resource Center and Eviction Diversion Efforts

In 2021 the Milwaukee Rental Housing Resource Center (RHRC) was launched to provide a one-stop shop for tenants and landlords in need of assistance to maintain or provide stable rental housing. Nine co-partner organizations from various parts of the rental housing system are working collaboratively to develop and increase access to services such as temporary rent assistance, mediation and legal services, and housing navigation.

The Center features a central intake process that is managed both virtually (www.RentHelpMKE.org) and at a physical space at Community Advocates, a community-based organization. RHRC staff include a Project Director, Intake/Referral and Triage Specialists, Housing Paralegal, and connections to other housing navigators. They assist clients with rent assistance applications, provide a private secure space for virtual hearings, and referrals for housing services. Lastly, the RHRC is working to develop a site of trusted information and resources on rental housing issues that will assist both tenants and landlords to navigate their housing situation.

Additionally, RHRC partners are working with Milwaukee County Courts to identify key strategies and tools that foster earlier interventions that could prevent the eviction process from being initiated. This includes enhanced resolution alternatives that help decrease the number of eviction filings, connect people to available resources and services, and stabilize precarious housing situations.

Implementation of IMPACT Community Information Exchange (CIE) System

In 2021, IMPACT, the Coordinated Entry service provider in Milwaukee began transitioning to a new, robust CIE system known as "IMPACT Connect" that will track service referrals over multiple systems. They are currently working to bring service providers and healthcare institutions into the CIE and developing processes that will lead to more effective service delivery for people experiencing multiple challenges, particularly related to housing and other supports.

Unmet Housing & Service Needs

This section describes the service needs of each Qualifying Population (QP). In August-September 2022 the City of Milwaukee conducted a needs survey as part of its Consultation process for the HOME-ARP Allocation Plan.

The survey tool was distributed to a broad network of community and economic development practitioners and targeted to service providers in the CoC and 43 responses were received.

Respondents were asked, *“Besides Shelter and Income, what are the other unmet needs you see for any of the qualifying populations?”* Below is a summary of the general needs that were shared:

- Rapid access to supplemental services such as food and energy assistance, employment and education opportunities, transportation, child care, and phone/internet/computers.
- Services that help address mental and behavioral health, substance abuse issues, and recovery support.
- Case management and individualized treatment approaches, and peer support.
- Access to health care, medication, and assistance with navigating the health system.
- Adequate stock of household items, furniture, clothing, and home goods once they are stably housed.
- Low barrier access to identification and other vital documents.
- More landlords that will accept vouchers and other incentives (i.e. security deposit, damage claim) to bolster the supply of rental options for re-housing.
- Resources to assist with conflict resolution and negotiation around terrible housing conditions.
- Reinvestment in aging permanent supportive housing infrastructure (i.e. developments 10+ years older).

Households experiencing homelessness

The survey asked *“What are the priority needs for those currently experiencing homelessness?”*

Below is a summary of responses:

- Affordable, sustainable housing options with supportive services that follow the Housing First model. Examples included Safe Haven-type housing that provides safety and stability while waiting for permanent housing, long-term rent support with wrap-around services, temporary housing into Rapid Re-Housing, and housing navigation.
- Access to emergency shelter or an immediate safe place to sleep/house temporarily with some privacy (i.e. hotel vouchers), food, internet/phone until transition or permanent placement can be made.
- Behavioral health services, treatment for substance use disorders, assistance with medication management.
- Supportive services that address their mental and physical health needs, and then other issues such as food, education, employment, clothing, etc.
- Housing for specific groups that are particularly vulnerable or have a higher level of need such as crisis care, complex trauma, intellectual or developmental disabilities, etc.
- Relocation support and storage for people at imminent risk of losing their housing.
- Simplifying the process for long-term vouchers (i.e. Section 8) and other housing subsidies to help increase landlord participation.
- Assistance with addressing past housing situations (i.e. eviction, energy arrears) and landlords that are willing to negotiate and/or work with service providers.

At Risk of Homelessness

For the question *“What are the priority needs for those at risk of homelessness?”* responses included:

- Financial assistance to pay rent and avoid an acute homelessness situation or access to shelter beds so they can avoid being on the street.
- Landlord liaisons or mediators who have access to flexible funds that can intervene sooner.
- Job security and/or employment with a living wage that eases the housing cost burden.

- Access to case management and supportive services without a lot of requirements.
- Community case management combined with flexible funding subsidies for safe, stable housing.
- Basic needs resources (food, transportation, health care) to help make ends meet and offset the stress of higher housing costs.
- Funding for landlord support such as subsidies, and security deposits.
- Job skill training, credit repair, and financial education that lead to better employment opportunities.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

The survey also asked *“What are the priority needs for those impacted by domestic violence?”*

Below is a summary of the responses:

- Increase in safe places available that are easily accessible with little notice.
- Emergency shelter and funding for relocation or hotel stays that are not tied to income loss and offer some privacy so victims have alternatives to returning to abusive environments.
- Immediate longer-term housing options that provide safety and stability for families with children.
- Supportive services including access to health care, food, legal assistance, employment, transportation, and physical and mental health services.
- Landlords that will work with this qualifying population (i.e. negotiate, ability to exit lease or contract for safety, take housing subsidies, etc.). Many discontinue after a domestic violence situation.
- Trauma-informed care, resources that encourage empowered decision-making, and access to integrative therapies that are low-cost.
- Not enough service providers to help victims of sex trafficking and access to low-barrier housing.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

In conversations with Milwaukee CoC service providers, the following service needs were identified:

- More sober living options for individuals seeking recovery.
- Housing navigation assistance and prevention services that are both systemized, yet specialized enough to serve different groups.
- More non-congregant housing spaces for people to utilize quickly.
- Lack of safe emergency spaces and transitional housing options for individuals and families that are in greatest need and who have no other housing option.
- Additional options for emergency warming and cooling rooms as a response to more extreme weather.
- More in-patient facilities with longer stays that allow for better supportive service delivery.

Additionally, the survey also asked *“Which populations typically get left out of funding priorities?”* which could be an indication of unmet needs in the service delivery system. Below is a summary of the responses:

- Those seeking to move for safety concerns or uninhabitable property conditions but are not considered an imminent need.
- Individuals with substance use disorders, chronic recurring mental illness, etc.
- Households without children, extremely large families, unaccompanied women who have unique trauma experiences, or single women who experience episodic instances of homelessness.
- Those that wish to remain unhoused.
- Young adults (18-21), particularly those with prior system involvement (i.e. juvenile justice, foster care).

- Formerly incarcerated people.
- Clients that don't meet all the criteria for homelessness but are couch-surfing and cannot stay.
- Those living with children in doubled-up arrangements.
- Perceived "gender different" people.
- Hmong, Native American people.
- People who do not have access to a phone or internet or cannot navigate the internet, without transportation, etc. and cannot get the help they need.

Gaps in Housing & Services

While the City of Milwaukee offers a variety of programs and services to assist those experiencing homelessness or at risk of losing their housing situation, a number of gaps have been identified through regular planning efforts with the Milwaukee CoC and the consultation process for this plan.

Service providers share that people that fall into the four Qualifying Populations (QPs) struggle with multiple needs, bringing a level of intensity to service delivery that can be very challenging. While all recognize that case management is the best approach, not all agencies or their staff are equipped with all the resources needed to assist someone across different service delivery systems (i.e. housing, employment, health).

The following **Gaps Analysis table** was provided by Milwaukee's HMIS service provider (ICA), which pulled the data from the 2022 Housing Inventory Chart & January 26, 2022 Point In Time (PIT) survey. Again, PIT data is a snapshot and does not provide a complete picture of current system capacity and needs. Shelters are still not operating at full capacity and people continue to be reluctant to enter into congregate settings. Service providers have shared that even while there may be some shelter units available, it is still difficult to meet the needs of those at risk of losing their housing.

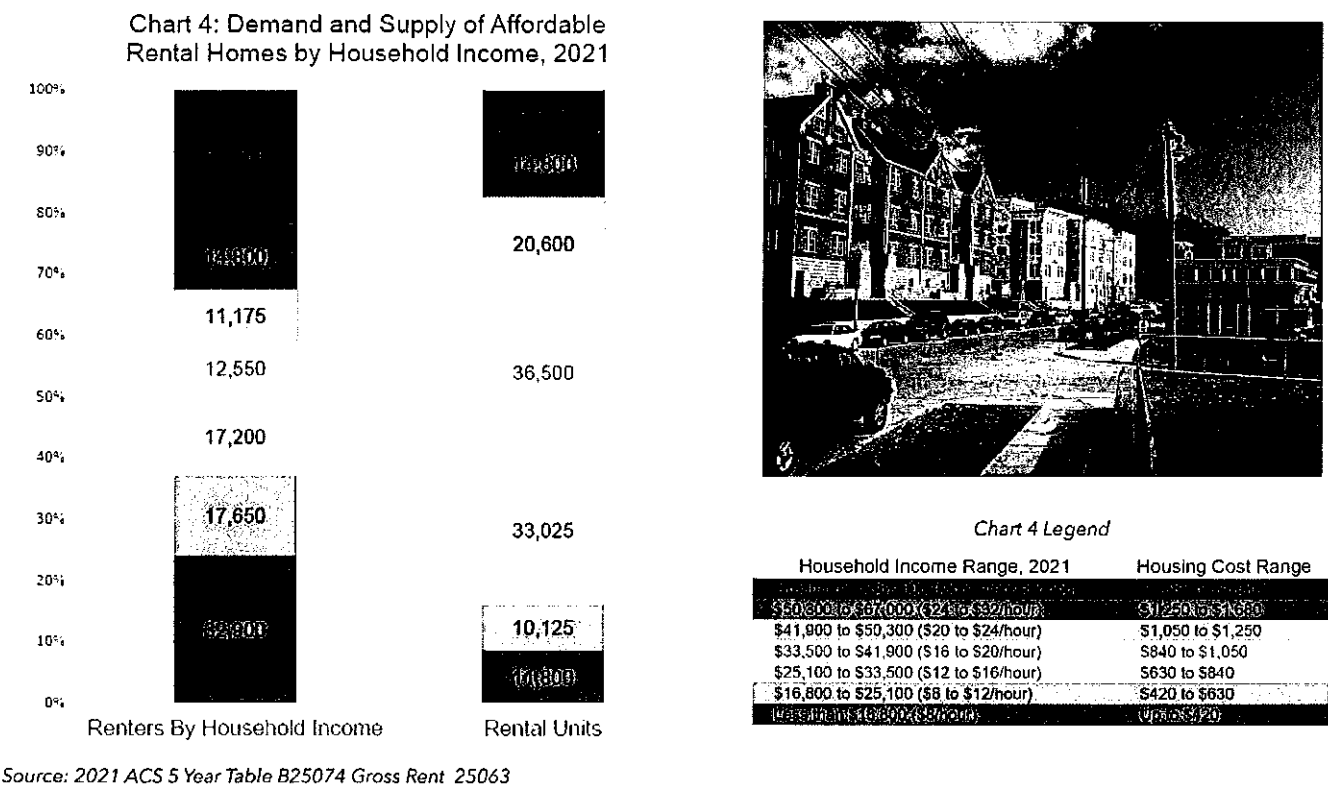
Project Type	Persons Served Households <u>With</u> Children	Number of Available Beds	Bed Availability
Emergency Shelter	130	226	96
Emergency Shelter - Covid Hotels	46	13	(33)
Safe Haven	-	-	-
Transitional Housing	9	33	24
Permanent Supportive Housing (PSH)	437	445	8
Rapid Re-Housing (RRH)	390	369	(21)
Total	1,012	1,086	74
Project Type	Persons Served Households <u>Without</u> Children	Number of Available Beds	Bed Availability
Emergency Shelter	288	407	119
Emergency Shelter - Covid Hotels	152	180	28
Safe Haven	43	47	4
Transitional Housing	77	112	35
Permanent Supportive Housing (PSH)	1,589	1,681	92
Rapid Re-Housing (RRH)	210	201	(9)
Total	2,359	2,628	269
Project Type	Persons Served Households - <u>Children Only</u>	Number of Available Beds	Bed Availability
Emergency Shelter	4	24	20
Emergency Shelter - Covid Hotels	-	-	-
Safe Haven	-	-	-
Transitional Housing	-	-	-
Permanent Supportive Housing (PSH)	-	-	-
Rapid Re-Housing (RRH)	-	-	-
Total	4	24	20
Project Type	Total Persons Served	Total Available Beds	
Emergency Shelter	422	657	
Emergency Shelter - Covid Hotels	198	193	
Safe Haven	43	47	
Transitional Housing	86	145	
Permanent Supportive Housing (PSH)	2,026	2,126	
Rapid Re-Housing (RRH)	600	570	
Total	3,375	3,738	

In survey and focus groups, Milwaukee CoC members and other service providers shared that there is a large need for non-communal options, especially in the wake of practices that were put in place during the COVID-19 public health pandemic such as the use of hotels. Individuals are less likely to go into shelters due to capacity or overall preference for options that allow for privacy or do not have additional requirements to stay there. A longer-term plan to prioritize and allocate resources to address unsheltered residents is needed.

Additionally, while Milwaukee’s competitive rental market contributes to housing instability, the following issues also make it increasingly difficult for service providers to secure long-term affordable housing:

- Lower vacancy rates.
- Increasing rents.
- The need for subsidized assistance for an increasing number of lower-income households.
- A lack of units that can pass a Housing Quality Standards inspection.
- A lack of landlords willing to take housing vouchers or participate in a supportive services model.

This chart from the City of Milwaukee 2022 Housing Affordability Report shows the supply-demand mismatch for affordable rentals. While it does not control for bedroom counts and family size or condition of units, it demonstrates that the gap of supply in affordable rental units generally exists for households at or below \$33,500 and especially for those making less than \$25,000 in annual income.



The lack of affordable rental units in the City of Milwaukee is also demonstrated in the following table, with data provided by the City of Milwaukee Department of City Development, noting a gap in units for 28,545 households. And while the City supports the development of low-income housing tax credit (LIHTC) housing through mechanisms including below-market land sales, zoning changes, and other city financial assistance, the number of projects and units fluctuate greatly year by year through this very competitive funding source.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units*	# of Households**	# of Households
Total Rental Units	134,839		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	24,637		
Rental Units Affordable to HH at 30 to 50% AMI (Other Populations)***	72,398		
0%-30% AMI* Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		46,840	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		21,650	
Current Gaps			28,545

Data Sources:

*Unit Count is based on Table B25063 Gross Rent (2019 5 Year ACS)

**Count of Households with Housing problems is based on Table S1901 (2019 5 Year ACS), and adjusted based on 2016-2019 CHAS

As part of the needs survey for the HOME-ARP Allocation Plan respondents were asked: *"What weaknesses do you also see in the current shelter and housing inventory?"* Below is a summary of the responses shared:

- There are not enough units and we are losing inventory to investor owners, many of whom are out of the state or country.
- A reduction in the number of landlords willing to work with previously homeless populations and/or low-income households, clients with vouchers, etc.
- Poor condition of housing units (repair needs, pest problems, etc.).
- Lack of beds and services to adequately support people with mental health and substance use needs.
- Shelters are often full and require clients to arrive for intake by mid-afternoon.
- Lack of shelter for women and large families or affordable sober living environments.
- Increasing rents and lack of regulation or monitoring of these practices.
- Extreme hard use and damage to permanent supportive housing units is not reimbursable and scattered site options are not easily compensated.
- Financing structure of LIHTC makes replacement challenging at best.
- Not enough scattered sites in different areas of the City or suburbs our housing in low-crime areas.
- Lack of safe haven-type beds for both unaccompanied youth and adults and high-needs families.
- Need for shelter for young adults (18-21, 18-24) and transitional living program with on-site services.
- Insufficient longer-term Rapid Re-Housing units for those that are not chronically homeless or at risk of homelessness.
- Lack of mission-driven property management entities.
- Not enough short-term housing options for the formerly incarcerated.

Respondents were also asked “*What weaknesses do you see in the service delivery system?*”

Below is a summary of the responses shared:

- Demand outpaces resources and services available.
- Specialized situations that require more in-depth case management experience significant barriers.
- High rates of turnover and vacancies often mean that shelter staff is undertrained, understaffed, and under-supported, which can cause poorer outcomes for clients, create unsafe environments, and restrict the distribution of shelter resources.
- Lack of support for mothers with children with special needs.
- Need more skilled service providers, staffing shortages are impacting service delivery.
- Getting help for people who are in the process of eviction is difficult as they have to hit the street or shelter first.
- Not enough housing navigation for on-the-ground search for housing and relocation.
- High need for mental health services.
- Case management ratios are not at recommended levels for the population.
- Lack of holistic/collaborative delivery of services, particularly across health care and behavioral health services and housing.
- Older, site-based permanent supportive housing gets little to no funding.
- Impact of decreasing emergency rent assistance funds or as households max out their available assistance, which has been essential to keeping people housed.

Additional Characteristics for Other Populations

While the plan describes a number of other groups that are at risk of housing instability, the City of Milwaukee will not include additional conditions to describe this Qualifying Population.

Identify priority needs for qualifying populations

A summary of the priority needs for the four Qualifying Populations as described above include:

- Development or conversion of affordable rental units for households at or below \$33,500 and especially for those making less than \$25,000 in annual household income (i.e. 50% AMI or below).
- Increase in housing units to provide short-term and transitional housing until placement into permanent supportive housing can be made.
- Strengthening of supportive services infrastructure (funding, staffing, connections across systems).
- Increased access to mental and behavioral health, and substance abuse services.
- Continued access to temporary rent assistance funds with “case management light” services that help keep people stably housed or relocate to a more affordable housing unit.
- Housing units for groups that experience multiple barriers or challenges to finding and keeping housing (i.e., families with children, have disabilities, struggle with mental illness, formerly incarcerated, underserved groups).

Additionally, the City of Milwaukee's 2020-2024 HUD Consolidated Plan identified the following critical efforts to assist people experiencing homelessness, at risk of homelessness, or housing insecurity:

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

The resulting needs assessment and gaps analysis for the HOME-ARP Allocation Plan consultation process is strongly aligned with these and HOME-ARP funds will assist the City in particular with increasing the number of affordable rental units for housing cost-burdened households, strengthening the inventory of short-term or transitional housing while transitions to permanent supportive housing are occurring, and supportive services that provide financial assistance to stably house people who are housing insecure.

Explain how the level of need and gaps in the shelter and housing inventory and service delivery systems were determined:

The plan consulted with the following groups for quantitative data to help define each of the qualifying populations (QPs):

- a. Milwaukee Continuum of Care's (CoC) Homeless Management Information System (HMIS), which provided annual program and outcome data for the City and County:
 - o 2021 Emergency Solutions Grant (ESG) Consolidated Annual Performance Evaluation Report (CAPER) for 1/1/2021 to 12/31/2021
 - o 2022 Housing Inventory Chart
 - o Point In Time (PIT) Count from January 26, 2022
- b. City of Milwaukee Department of City Development, which provided data on housing cost burden, housing inventory supply and demand, and other general City housing and demographic characteristics.
- c. Housing Authority of the City of Milwaukee (HACM), which provided information on housing units and vouchers.
- d. IMPACT provided Coordinated Entry data by category for January through mid-November 2022.

A full Bibliography of additional reports consulted is included with this plan in Appendix A.

Additionally, the City consulted with Milwaukee CoC service providers, members, and other community and economic development stakeholders active in housing through a survey tool, meetings, and interviews. The summary and conclusion from this qualitative data are included throughout the report.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, sub-recipients and/or contractors:

The City of Milwaukee will allocate HOME-ARP funds by a combination of competitive Requests For Proposals (RFPs) and annual applications for other HUD entitlement funds that support the priority needs identified in this plan (i.e. via Notice of Funding Availability or NOFA or annual Funding Allocation Plans).

RFPs will explain eligible uses for the funds, the qualifying populations to be served, and priority needs as described in the HOME-ARP Allocation plan. All requests will be reviewed following the same process CDGA uses for the annual CoC NOFA and/or annual ESG funding entitlement. All approved development projects will be subject to annual monitoring, developer requirements, compliance, and inspections during the minimum affordability period.

Describe whether the PJ will administer eligible activities directly:

The City of Milwaukee will not directly administer any activities for HOME-ARP.

If any portion of the PJ's HOME-ARP administrative funds are provided to a sub-recipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the sub-recipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the sub-recipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable. HOME-ARP funds will be directly administered by the City of Milwaukee Community Development Grants Administration (CDGA) office.

Use of HOME-ARP Funding

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The table below shows the amount and percentage of HOME-ARP funding that is planned for each eligible HOME-ARP activity type. All categories, including planned administration, are within allowable HOME-ARP statutory limits. If needed, amendments will be processed during the HOME-ARP period of performance as needed to ensure the funding continues to assist qualifying populations in a timely manner.

Activity	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 3,061,899	15%	
Acquisition and Development of Non-Congregate Shelters	\$ 6,077,366	30%	
Tenant Based Rental Assistance (TBRA)	\$ 2,030,946	10%	
Development of Affordable Rental Housing	\$ 4,061,893	20%	
Non-Profit Operating	\$ 1,015,473	5%	5%
Non-Profit Capacity Building	\$ 1,015,473	5%	5%
Administration and Planning	\$ 3,046,420	15%	15%
Total HOME ARP Allocation	\$ 20,309,464		

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City of Milwaukee's HOME-ARP funds will be used to address various parts of the housing and homeless services delivery system. The needs assessment and feedback from stakeholders indicated a preference and priority on adding non-congregant units to the shelter inventory, developing affordable rental units for very low-income households, continued use of temporary rent assistance, and providing supportive services to keep people stably housed to better meet the needs of those experiencing homelessness or at imminent risk of losing their housing.

Additionally, the City has allocated funding to provide operating and capacity building support to strengthen nonprofits that are poised to increase their ability and programs/services to engage in HOME-ARP activities. Future technical assistance (training, staff development, program design) may be needed given the complex nature of serving these qualifying populations with both housing and supportive services.

The City of Milwaukee's 2022 Housing Affordability Report clearly shows the higher percentages of people with low household income and/or are severely housing cost-burdened, putting them at significant risk of housing insecurity. The report also demonstrates a supply mismatch, with a concentrated lack of rental units affordable to households at lower incomes.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City of Milwaukee estimates that about 75 units of Non-Congregate Shelter and 50 units of Affordable Rental Housing will be produced or supported through this HOME-ARP allocation.

Additionally, because the City of Milwaukee CDGA will use an RFP/competitive process to award HOME-ARP funds, it is expected that proposed projects will leverage other funding sources such as Low-Income Housing Tax Credits (LIHTC), Housing Trust Fund and Federal Home Loan Bank grants, and other community or private philanthropic sources to increase the number of units produced.

Lastly, about 4,800 individuals and/or households will benefit through housing, supportive services, or Tenant Based Rental Assistance (TBRA) to help stabilize their housing situation.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Each of the eligible activities presents an opportunity to advance significant efforts in Milwaukee to address the significant challenges facing low-income and housing insecure households. There is a particular focus on prioritizing the increase of housing units that assist people both temporarily to stabilize their housing situation, but also with long-term affordability. Strengthening supportive services ensures that households receive additional assistance with barriers that have prevented them from remaining stably housed.

The RFP process will ensure that projects that meet the needs identified in this plan are prioritized. Affordable rental units developed with HOME-ARP funding will remain affordable to qualifying households for at least 15 years after development and will continue to serve households with the greatest need. By adding new non-congregate shelter units, the Milwaukee CoC will have strengthened its temporary/immediate housing need inventory, which will assist the City with meeting needs, particularly during times when the numbers of unsheltered increase or are at great risk due to weather conditions (i.e. warming places during winter). These units could also remain affordable for a significant period, allowing Milwaukee to assist hundreds of people experiencing homelessness.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- *Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).*
- *PJs are not required to describe specific projects to which the preferences will apply.*

The City of Milwaukee does not intend to give preference to any specific qualifying population or subpopulation. Any subsequent RFPs for HOME-ARP allocation projects will indicate that projects should serve any of the qualifying populations allowed under HOME-ARP and as described in this allocation plan.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of the qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City of Milwaukee does not intend to give preference to any specific qualifying population or subpopulation. As described in the Needs Assessment and Gap Analysis section of this allocation plan, HOME-ARP funds will be used to address unmet needs in non-congregate housing, affordable rental housing, and supportive services for each of the eligible qualifying populations.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJs may use multiple referral methods in their HOME-ARP program. (Optional):

The City of Milwaukee will utilize expanded coordinated entry to manage referrals for projects funded through HOME-ARP. The local coordinated entry system (IMPACT) will expand to accept all qualifying populations while still meeting locally established prioritizations.

IMPACT will work with the City to develop a referral process that is similar to how they manage referrals for Section 8 and HUD's Permanent Supportive Housing (PSH) initiative, Move On, which is currently managed through Coordinated Entry for all HUD program types. For example, households are prioritized via a Move On assessment and through a biweekly by-name-list case conferencing meeting to ensure best fit and allow for equity adjustments in the prioritization list.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV. A of the Notice:

City of Milwaukee HOME-ARP funds will be used to address the needs of all qualifying populations through various projects that will be undertaken.

The City of Milwaukee will not violate any applicable fair housing, civil rights, and nondiscrimination requirements as part of the implementation of HOME-ARP projects.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of the qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A

HOME-ARP Refinancing Guidelines

The City does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

Conclusion

Through a comprehensive community consultation and planning process, the City of Milwaukee and its partners gained additional insight into the needs, available resources, and gaps in the City of Milwaukee's housing ecosystem.

The City sees the HOME-ARP allocation as a significant opportunity to address what has become a chronic shortage of affordable housing that can help meet gaps for those experiencing homelessness or at risk of homelessness due to unstable living conditions and other challenges, while strengthening supportive services to ensure that households receive additional assistance to address barriers that have prevented them from remaining stably housed.

Appendix A: Bibliography & Data Sources

1. The City of Milwaukee 2022 Housing Affordability Report, City of Milwaukee Department of City Development. Available at <https://experience.arcgis.com/experience/5b4da2c75d51429d8fc81fbf70872785/page/1-Home/>
2. Milwaukee Collective Affordable Housing Plan, Community Development Alliance. Available at www.housingplan.org.
3. City of Milwaukee Community Development Grants Administration (CDGA) documents, available at <https://city.milwaukee.gov/CDGA> and include:
 - a. Request For Proposals (RFPs) for CDBG, HOME, ESG, Housing Trust Fund
 - b. Current year Funding Allocation Plan
 - c. Most recent Consolidated Annual Performance and Evaluation Report (CAPER)
 - d. 2020-2024 HUD Consolidated Plan
 - e. Regional Analysis of Impediments to Housing
4. Milwaukee Continuum of Care Point In Time Count data. Available at <http://milwaukeeccoc.org/hmis-data/point-in-time-information/>.
5. Milwaukee Journal Sentinel: "Human trafficking is expected to rise due to the coronavirus pandemic. This Milwaukee initiative is taking a stand against it." (12/23/2020). Accessed at: <https://www.jsonline.com/story/news/local/milwaukee/2020/12/23/milwaukee-human-trafficking-hot-spot-how-one-group-helping/3949816001/>
6. Milwaukee Journal Sentinel: "Milwaukee as a 'mecca for sex trafficking': New report sheds light on scope of the problem." (3/1/2018). Accessed at: <https://www.jsonline.com/story/news/crime/2018/03/01/new-report-estimates-340-kids-and-young-adults-have-been-sex-trafficked-milwaukee-over-four-year-per/363964002/>
7. *Estimating the Magnitude of Sex Trafficking Risk and Victimization of Juveniles and Young Adults City of Milwaukee January 1, 2013 - December 31, 2016*. A Report by Milwaukee Homicide Review Commission, Rethink Resources, Medical College of Wisconsin Institute for Health & Equity, Milwaukee, Sexual Assault Review, and Milwaukee Police Department – Sensitive, Crimes Division (March 1, 2018). Accessed at: <https://www.mcw.edu/-/media/MCW/Departments/Epidemiology/MHRC/2018-Milwaukee-Juveniles-and-Young-Adults-Sex-Trafficking-Report.pdf>
8. Sojourner and Jamie Kimble Foundation for Courage, "The Economic Impact of Domestic Violence in Milwaukee & Wisconsin 2021" report, October 2022. Available at <https://bit.ly/3xm4vez>
9. Milwaukee Homicide Review Commission Domestic and Intimate Partner Violence Report October 2020. Accessed at https://www.mcw.edu/-/media/MCW/Departments/Epidemiology/MHRC/dvipvreport_FINAL.pdf.

Appendix B: Milwaukee-area Agencies in the Homeless Services System

Milwaukee Continuum of Care

Agency Name	Services & Facilities
Vivent Health (formerly known as AIDS Resource Center of Wisconsin)	One location in the City of Milwaukee that offers the following services to HIV positive clients: Behavioral & Mental Healthcare, Case Management, Pharmacy, Housing Services, Legal Services, Food Pantry, Nutrition Services, Substance Abuse Treatment, Dental Care, Medical Care, PrEP, HIV Testing, STI Testing, Lifepoint Needle Exchange.
Cathedral Center	Focuses on three areas of service for single women and families: Emergency and longer-term housing, case management, and income growth programming.
Community Advocates	<p>Homeless Outreach Nursing Center (HONC) provides person-centered outreach and engagement to individuals with mental illness who are chronically homeless and living on the streets, in vacant buildings, under bridges, or in parks.</p> <p>Project Bridge/Autumn West housing program, which follows the Housing First model. Includes immediate access to safe and affordable housing and case management services for Milwaukee residents who have been identified as experiencing chronic homelessness and living with a disability.</p> <p>The Milwaukee Women's Center is a division of Community Advocates and provides comprehensive services and treatment for women, men, and children whose lives have been affected by domestic violence, addiction, mental health issues, homelessness, and poverty.</p>
Center for Veterans Issues (CVI)	CVI actively serves veterans and their families with challenges and concerns across 54 counties in Wisconsin. They provide supportive services, transitional housing, and permanent supportive housing that assists veterans to reintegrate and maintain stability.
Friends of Housing	Originally created by HACM in 1996, Friends of Housing manages a number of public housing development including the Berryland, Carver Park, Cherry Court, Convent Hill, Convent Hill Gardens, Highland Gardens, Lapham Park, Northlawn, Olga Village, Project Restore, Reverend Davila, Southlawn, Westlawn, Victory Manor and multiple scattered site properties for HACM.
The Guest House of Milwaukee	Since opening their doors to provide short-term shelter in 1982, Guest House has grown to provide a full continuum of services both onsite and throughout the City, touching thousands of lives and involving the entire community. The agency is the only provider in the CoC that provides

	emergency shelter for single males and is one of the main providers of Rapid Re-Housing for single adults.
Heartland Alliance/Heartland Housing	Heartland Alliance, one of the world's leading anti-poverty organizations, works in communities in the U.S. and abroad to serve those who are homeless, living in poverty, or seeking safety. It provides a comprehensive array of services in the areas of health, housing, jobs, and justice – and leads state and national policy efforts, which target lasting change for individuals and society. They partner with the CoC to provide permanent supportive housing services; also have a partnership with HACM and Capuchin.
Hope House of Milwaukee	The mission of Hope House is to end homelessness and create healthy communities. They are the only CoC provider to have fully adopted the Rapid Re-Housing model, which focuses on providing transitional care for families as they await housing placement. They also operate a community center located in the near south side of Milwaukee. Opened in 1987, Hope House was created to provide a safe, temporary refuge for people needing a place to sleep.
IMPACT, Inc.	With 60 years of experience serving Southeastern Wisconsin, IMPACT helps people take the first step toward changing their life, for good. They assess and guide those experiencing personal crisis toward resources to achieve stability; and collaborate with community partners to foster system improvement. IMPACT is the administrative lead for Milwaukee's Coordinated Entry (CE) program, housing one of the main access points for the CoC's CE system.
Institute for Community Alliances	Institute for Community Alliances (ICA) is a nonprofit organization based in Iowa that functions as the Homeless Management Information System (HMIS) Administrator in 14 states, providing technical assistance and training support for more than 4,000 database users. ICA supports data-driven solutions and community information systems that help communities address housing instability, homelessness, food insecurity, and related issues.
La Causa	The mission of La Causa, Inc. is to provide children, youth, and families with quality, comprehensive services to nurture healthy family life and enhance community stability.
Mercy Housing Lakefront	Mercy Housing handles every aspect of the affordable housing process, from project financing and housing development to community outreach and long-term resident services. We provide a custom approach to affordable housing which allows us to help more people and more communities while ensuring that each project is completed to our high standards
Milwaukee County Housing Division	Milwaukee County's supportive housing programs assist individuals who have mental illness in obtaining safe and affordable housing. Since 2008, the County has helped create over 700 permanent supportive housing

	units, and supports transitional housing and harm reduction housing using the Housing First model.
Outreach Community Health Centers	Outreach provides rental subsidies for 45 units of housing for periods that range from three to eighteen months. The length of subsidy is determined at the time of program entry and is based on the unique strengths and challenges of each family unit.
Pathfinders	Pathfinders helps homeless and housing-insecure youth find and sustain safe housing. Once housed, they offer support to youth as they work towards stability, mental well-being, education, employment, and other personal goals.
The Salvation Army of Milwaukee	Since 1979, the Emergency Lodge at N. 7th Street in Milwaukee has 120 beds that provide emergency shelter to homeless individuals and families with children. More than 80% of residents successfully move from shelter to safe, affordable housing each year.
Sojourner Family Peace Center	Sojourner Family Peace Center is the largest nonprofit provider of domestic violence prevention and intervention services in Wisconsin, serving over 11,800 clients each year. Sojourner provides an array of support aimed at helping families affected by domestic violence achieve safety, justice, and well-being.
St. Catherine's Residence	Provides housing in partnership with Mercy Housing Lakefront for up to 164 women in suite-style apartments, with shared baths and community kitchens. Women may rent short- or long-term and stay as long as they need.
Walker's Point Youth and Family Services	Serves homeless single or parenting young men and women ages 17-24 years old. Programs offer longer-term housing (for up to 24 months) and supportive services to prepare them for self-sufficiency and independence.

Learn more about Milwaukee's Continuum of Care at www.milwaukeeecoc.org.

Other Agencies Addressing Homelessness

Agency Name	Services & Facilities
Dryhootch	Formed by combat Veterans to help Veterans in their return home by providing a place where they can gather informally in a coffee house; a safe, comfortable, drug-and-alcohol-free environment. Offers a variety of peer-focused supportive services.
Lutheran Social Services of Wisconsin and Upper Michigan	A Midwest health and human services organization that has been operating since 1882. Housing programs include providing safe, decent, and affordable housing for a variety of persons with special needs. Also has a Veterans housing and recovery program in Racine County that offers

	services to Federally-recognized veterans with mental illness, AODA, and at risk of homelessness.
Milwaukee Homeless Veterans Initiative	Founded and run by veterans, MHVI offers six programs that include case management/supportive services, assistance with securing stable housing and supplies, homeless outreach, services specifically for female veterans, and help with meeting basic needs.
Milwaukee Rescue Mission	The Rescue Mission offers three distinct programs for families in crisis. Joy House for women and children, Safe Harbor for men, and Cross Trainers Academy for children.
Street Angels of Milwaukee	The Angels offer basic necessities such as food, clothing, blankets, and hygiene items to people experiencing homelessness in Milwaukee.
The Benedict Center	Provides services for women with past interaction with the criminal justice system and/or formerly incarcerated.
Vets Place Central	Provides transitional housing for male and female veterans experiencing homelessness, including wraparound supportive services designed to assist with reintegrating into the community and moving into permanent housing.
VA Hospital	Provide a national call center for veterans who are homeless or at imminent risk of homelessness to connect them with assistance.
Veterans Affairs Supportive Housing (VASH) / HUD	VASH provides rental assistance vouchers, which are primarily directed through the City housing authority to expand support for homeless veterans.
NOTE: A number of other nonprofits and other organizations provide services to help address housing security and prevent homelessness such as food pantries, faith-based entities, neighborhood-based groups, etc.	

Appendix C: Milwaukee Public Housing Developments

The following public housing developments listed below are included in the Housing Authority of the City of Milwaukee (HACM)'s Agency Plan, which is approved by HUD.

Development	Total # of Units	# of public housing units	# of project-based voucher units	# of low-income housing tax credit (LIHTC) <u>only</u> units	# of market rate units	Population served
Arlington Court	230	230				180 units designated for seniors and 50 for seniors and/or persons with disabilities.
Becher Court	120	120				Designated for seniors.
Cherry Court	120		120			Designated for seniors and/or persons with disabilities. All units are also LIHTC units.
College Court	251	251				125 units are designated for seniors and 126 are designated for seniors and/or persons with disabilities.
Convent Hill	80		42	38		Designated for seniors. All units are also LIHTC units.
Highland Gardens	114		80	34		Designated for seniors and/or persons with disabilities. All units are also LIHTC units.
Holton Terrace	120		120			Designated for seniors and/or persons with disabilities. 100 of the units are also LIHTC units.
Lapham Park	201		201			Designated for seniors. All units are also LIHTC units.
Lincoln Court	110	110				Designated for seniors and/or persons with disabilities.
Locust Court	230	230				Designated for seniors and/or persons with disabilities.
Merrill Park	120	120				Designated for seniors and/or persons with disabilities.
Mitchell Court	100	100				Designated for seniors and/or persons with disabilities.
Olga Village	37		37			Designated for seniors. All units are also LIHTC units.

Development	Total # of Units	# of public housing units	# of project-based voucher units	# of low-income housing tax credit (LIHTC) <u>only</u> units	# of market rate units	Population served
Riverview	180	180				Designated for seniors and/or persons with disabilities.
Townhomes at Carver Park	122	51		51	20	Family housing.
Highland Homes	56	56				Family housing.
Hillside Terrace	470	470				Family housing.
Parklawn	380	380				Family housing.
Westlawn Gardens	250		230	20		47 units designated for seniors. The rest of the units are designated for family households.
Westlawn Gardens Scattered Sites	30		18	12		Family housing.
Victory Manor (Westlawn)	60		44	10	6	Veterans preference housing.
Scattered Sites South (688)	64	64				Family housing.
Scattered Sites North and West (691)	143	143				Family housing.
Scattered Sites Milwaukee (694)	57	57				Family housing.
Cherry Court HOPE VI Scattered Sites (693)	69	69				Family housing.
Scattered Sites Tax Credit I (698)	24		24			Family housing. All units are also LIHTC units.
Scattered Sites Tax Credit II (675)	24		24			Family housing. All units are also LIHTC units.
Total	3762	2631	940	165	26	

Appendix D: Public Participation

1. City of Milwaukee HOME-ARP Allocation Plan Overview Slide Deck

Used in community outreach and consultation process August-November 2022.

Includes the following:

- Description of HOME-ARP funds
- Intended uses
- Timelines
- Allocation plan process
- Components of the plan
- Consultation process
- Definitions of the four Qualifying Populations
- Eligible activities
- Information on goals and preferences.

View slide deck here:

https://drive.google.com/file/d/11P6Oq3NveLKTxuhRqrCEbkP8Qlrjk8sx/view?usp=share_link

2. City of Milwaukee HOME-ARP Allocation Plan Consultation Survey Information

Open for participation August 31-October 13, 2022. Distributed via Continuum of Care, UEDA, and other coalition partners that serve the four qualifying populations. Received 43 responses.

Survey results were summarized and included in the Allocation Plan, particularly in the Needs Assessment & Gaps Analysis section. View summary of survey results by question here:

https://drive.google.com/file/d/1twB8zGtJ_YgYGPYUIntKbrACV3QYPNlL/view?usp=sharing

3. UEDA Newsletter to promote virtual hearing on 3/15/23 and opportunity to comment (3/1/23).

See next page for image of newsletter or view here:

https://drive.google.com/file/d/1XYGGfvPXm20MtN4vidPIGI_mTa7Bexka/view?usp=share_link



What We're Working On

Carnival Milwaukee - our signature event - is THIS Friday, March 3rd!

Scroll down for details...now onto the February Newsletter!

New Team Member Joins UEDA!

We are thrilled to announce that Martha Collins has joined the UEDA team as our Member Services Director, where she will lead our membership engagement and communications efforts, providing critical support to UEDA programs and events. She'll also help us develop a more robust policy and advocacy infrastructure so we can better support our Members.

Martha is a proven senior leader with a diverse background in coalition building, program management, fund development, and nonprofit advocacy in issues that promote equity and economic opportunity and is a licensed consultant with the Nonprofit Standards of Excellence. She has dedicated her career to working with social justice organizations that focus on building power within marginalized communities. Please feel free to reach out and introduce yourself to Martha (martha@ueda.org) or you can say hello on Friday evening at Carnival Milwaukee!

HOME-ARP Allocation Plan ready for public comment starting March 2nd

In 2022 UEDA began work on this plan for the City's allocation of these funds from HUD, which can be spent through 2030. The HOME-ARP funds are intended to help meet the needs for specific groups at the greatest risk of housing instability, including those experiencing or at risk of homelessness, and/or fleeing domestic violence or trafficking. You can view the plan at www.ci.milwaukee.gov/CDGA and provide comments there. Or, join us on Wednesday, March 15 from 12-1:15pm for a virtual hearing where you can learn about the plan and provide comments. [Register here](#) >>

And now for Carnival Milwaukee!

This year UEDA will celebrate 15 years of Carnival Milwaukee and honor the life of Bill

4. Public Comment Notice: February 28, 2023

The following notice on page 48 was posted by the City of Milwaukee CDGA.

5. City of Milwaukee HOME-ARP Allocation Plan Slide Deck for Public Hearings

Provides background and basic guidelines for the use of HOME-ARP funds, process to develop the plan, and a summary of information in the plan related to the Needs Assessment, Gaps Analysis, Housing Inventory, Eligible activities and proposed allocation, and how to provide comment.

View slide deck here:

https://drive.google.com/file/d/1bvWSeWSzxAcrlT_-ne9FsfOFKNhQnY8c/view?usp=share_link



PUBLIC NOTICE OF AVAILABILITY

PROPOSED HOME AMERICAN RESCUE PROGRAM ALLOCATION PLAN

CITY OF MILWAUKEE COMMUNITY DEVELOPMENT PROGRAM

In accordance with the regulations of the U.S. Department of Housing and Urban Development (HUD), the City of Milwaukee has prepared and will submit to HUD the following plan:

HOME American Rescue Program Allocation Plan with proposed funding categories. The HOME-ARP Allocation Plan incorporates strategic direction for how the City of Milwaukee will make significant, targeted investments in permanent supportive housing and assist people experiencing homelessness, those at risk of homelessness, and those at the greatest risk of housing instability.

The HOME-ARP Allocation Plan outlines the community consultation, public participation and planning process, an assessment of needs for each qualifying population, information about resources and gaps, housing production goals, and an overview of the funding allocation.

The City of Milwaukee Community and Economic Development Committee will hold a public hearing to obtain citizen comments on the proposed HOME-ARP Allocation Plan on the following dates:

Public Hearing Dates

Wednesday, March 8, 2023, 1:30 pm Please join my meeting from your computer, tablet or smartphone. https://meet.goto.com/376466893 You can also dial in using your phone. Access Code: 376-466-893 United States: +1 (571) 317-3122	Wednesday, March 15, 2023, 12 noon Please register using this link: https://us06web.zoom.us/join/register/tZcadQyrrTspH9ND0wYwzaG794EITyEt8zXA
---	--

The public comment period for review of the HOME-ARP Allocation Plan is from *March 3, 2023 through March 20, 2023*. Any written comments received will be forwarded to HUD, as required by Federal regulations. Comments can be submitted to CDGARports@milwaukee.gov. Subject: HOME-ARP Comment.

Copies of HOME-ARP Allocation Plan are available beginning March 3, 2023 on the Community Development Grants Administration website www.milwaukee.gov/CDGA.

The public comment period for review of the HOME-ARP Allocation Plan is from March 3, 2023 through March 20, 2023. Any written comments received will be forwarded to HUD, as required by Federal regulations. Copies of HOME-ARP Allocation Plan are available beginning March 3, 2023 on the Community Development Grants Administration website [www.milwaukee.gov/CDGA](http://www.milwaukeegov.org/CDGA)

City of Milwaukee: SF-424 & Certifications

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

03/23/2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Milwaukee

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

39-6005532

*** c. UEI:**

JYGKV746MNG2

d. Address:

* Street1: 200 East Wells Street

Street2: City Hall, Room 606

* City: Milwaukee

County/Parish:

* State: WI: Wisconsin

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 53202-3515

e. Organizational Unit:

Department Name:

Department of Administration

Division Name:

Community Dev. Grants Admin

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.

* First Name: Steven

Middle Name: L.

* Last Name: Mahan

Suffix:

Title: Director

Organizational Affiliation:

* Telephone Number: 414-286-3647

Fax Number:

* Email: steven.mahan@milwaukee.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Dept. of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Home Investment Partnership American Rescue Plan

*** 12. Funding Opportunity Number:**

554340

* Title:

American Rescue Plan Act HOME Supplemental Allocations

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

HOME-ARP Allocation Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="20,309,464.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="20,309,464.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

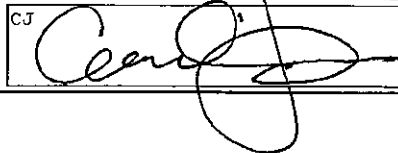
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:Prefix: * First Name: Middle Name: * Last Name: Suffix: * Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative: CJ

* Date Signed:

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

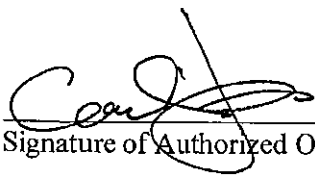
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

March 23, 2023

Date

Mayor - City of Milwaukee

Title

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. § 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Milwaukee - CDGA	DATE SUBMITTED 04/13/2023

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

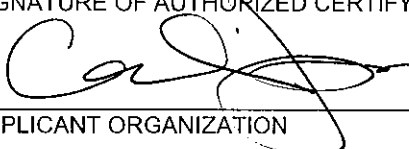
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 		TITLE Mayor
APPLICANT ORGANIZATION City of Milwaukee		DATE SUBMITTED April 13, 2023