

SECTION VI: MONITORING

VI.A General

Activities under this Plan will be monitored under the standards adopted for the performance reports required for participation in HUD programs. The performance report will trigger monitoring of HPA activities that may not be required under these reports.

Disadvantaged business enterprise (Minority and Women's) participation will be tracked by the semi-annual reports submitted to HUD.

VI.B CDBG Monitoring

Each CDBG activity is monitored to insure compliance with program requirements, accountability of funds expended, progress, and other issues of concern. The form of monitoring differs somewhat depending upon the type and duration of the project. All subgrantees and program recipients are required to submit, with each request for payment, complete documentation of expenditures. At the same time the subgrantee must submit program progress forms which report numbers of persons served by an activity and demographic information on the persons served.

In the case of service type activities, which often last the length of a program year, periodic reports and expenditure documentation are supplemented by an annual site visit to verify procedures and check support documentation for information submitted on reports, both financial and programmatic. As part of the on-site monitoring, clients are randomly selected from files by County staff so that follow-up telephone calls can be made to verify service and determine service quality.

Projects involving any type of construction must be monitored on-site for compliance with the Davis-Bacon Act. The Davis-Bacon compliance visits afford County staff the opportunity to measure progress on the project and assure that the activity being undertaken is, in fact, that which is contained in the subrecipient agreement.

Additional monitoring activity may take place if special concerns or issues require it. This may occur if any of the required reports or monitoring visits appeared to indicate the possibility of any kind of irregularity concerning any of the program regulations.

SECTION VIII: ANNUAL ACTION PLAN (PROGRAM YEAR 2011)

VIII.A Federal Resources

Federal resources anticipated to be available in this Program Year to address the priority needs and specific objectives identified in the Five Year Strategic Plan (Part IV) include:

<u>Federal Programs</u>	<u>Uses</u>
Community Development Block Grant \$1.7 million	Infrastructure construction and rehabilitation, services, recreation, job creation, housing rehabilitation
HOME \$1.2 million	Housing rehabilitation, acquisition, site preparation/land development, new construction, homebuyer assistance
Section 8 Existing Rent Assistance \$12.1 million	Rent assistance, Family Self-Sufficiency
Safe Havens/Shelter + Care \$3 million	Rental housing for low income chronically mentally disabled
Low Income Tax Credits	Housing development
Section 202 Elderly Housing	Elderly housing loans
Section 811 Disabled Housing	Accessible housing loans

VIII.B Other Resources

Other resources anticipated to be available to address the needs and objectives identified in the Strategic Plan include:

State Programs

Various WHEDA programs

Uses

Mortgage and rehabilitation assistance; programs can vary based on bonds issued

Community Options Program

Non-institutional living for elderly, disabled

County Programs

Supportive Housing Trust Fund
Housing Organization Loan Fund

Special needs housing development
Housing financing for community based organizations

County-wide Home Repair

Housing rehabilitation

Disability Services Division

Accessible assistance

Veteran's Office

Assistance for veterans

Department on Aging

Elderly/disabled air conditioning, accessibility

Private Non-Profit

Social Development Commission
Weatherization Program

Weatherization

Interfaith Program for Elderly

Maintains list of available units

Independence First
(Southeastern Wisconsin Center
for Independent Living)

Maintains list of available units

Metro Milwaukee Fair Housing Council

Maintains list of available units

Movin' Out, Inc

Housing development

Private For-Profit

Various subsidized units

See Section I.A.4

The HOME Program requires a 25% match for all HOME funds expended. Under the Milwaukee County HOME Consortium Agreement, each Consortium partner is responsible for meeting and documenting the HOME match requirement for funds spent within its jurisdiction. As the lead agency, the County will document match for CHDO set-aside activities.

The County meets its match obligation by an allocation of local funds or by match vredit. CHDO activities may be matched by credit generated by other CHDO activities.

Wauwatosa and West Allis have indicated that match credit has been found from several resources.

VIII.C Geographic Distribution

HOUSING ACTIVITIES

The Annual Action Plan geographic priorities for housing activities are those stated in the Strategic Plan for Affordable Housing (Section IV.B above).

NON-HOUSING ACTIVITIES

No geographic priorities for non-housing activities are established. Community development needs exist across all of Milwaukee County. There are no areas of minority concentration.

VIII.D Program Specific Requirements

COMMUNITY DEVELOPMENT BLOCK GRANT

A.) Specific requirements for CDBG funds:

The entire use of funds will be described in part VIII.E below. All program income either remains in the revolving loan funds, or will be reprogrammed to new activities as the income becomes available. Anticipated CDBG program income for 2011 is \$100,000. There will be no float-funded activities. There are no activities qualifying under urgent needs criteria.

HOME

A.) Tenant Based Rental Assistance

HOME funds will not be used for TBRA.

B.) Other Forms of Investment

Forms of investment other than those authorized in 92.205(b) are not included in this Plan.

C.) Affirmative Marketing

Affirmative marketing is required for HOME assisted housing of 5 or more units. Since such projects will not be defined until proposals are received, it is uncertain if the 5 or more unit/required affirmative marketing provisions will be triggered. If such provisions are applicable, the awarded developer will, by its agreement with the County, be required to meet the terms of 92.351(b). The developer shall affirmatively market rehabilitated units through good faith efforts by providing information to eligible persons from all racial, ethnic and gender groups in the housing market. The developer shall advertise the availability of units by commercial media, use of community contacts, including the Equal Housing Opportunity logo type or slogan in all advertising, and by display of the fair housing poster. The developer shall inform and solicit applications from persons in the housing market area who are not likely to apply for the housing without special outreach (e.g., use of community organizations, churches, employment centers, fair housing groups or housing counseling agencies). The developer shall keep written records that document efforts to affirmatively market units, and the County shall annually assess the results of these actions. A developer's failure to carry out these actions can result in requirements for corrective actions, including mediation by the Metropolitan Fair Housing Council.

D.) Specific requirements for first time homebuyers:

A Program participant shall execute a non-amortizing, nonrecourse, non-interest bearing promissory note in the amount of the HOME assistance provided. An affidavit of interest shall be recorded to secure the County's note. The note is payable in full within the "period of affordability" under the following circumstances:

1. The participant no longer occupies the house as a principal place of residence; or
2. The participant sells the house. In the case of a sale prior to expiration of the "period of affordability", repayment will be based on the net proceeds of the sale. If the net proceeds are not sufficient to recapture the full HOUSE investment plus enable the homebuyer to recover the amount of the homebuyer's downpayment and any capital improvements, then the County will recover the balance, if any. The same procedure would apply in the case of a foreclosure, although, under this circumstance, recapture would be unlikely.

This Program may be used for newly constructed homes.

VIII.E Narrative for Other Actions

1. Obstacles to Meeting Underserved Needs Consolidated Plan reference: III.A, III.B

The principal obstacle identified in the Consolidated Plan to meeting underserved needs is the lack of financial resources.

The County plans to utilize the resources described in VIII.A and VIII.B above during 2011. Other resources may be pursued if they become available.

2. Foster and Maintain Affordable Housing
Consolidated Plan reference: IV.B.

The County will pursue the goals for affordable housing as they are established in the Consolidated Plan, utilizing the resources described in VIII.A and VIII.B above during 2011.

3. Remove Barriers to Affordable Housing
Consolidated Plan reference: II.E, IV.F.

Actions planned for 2011 include:

The County's Supportive Housing Trust Fund, created specifically to provide affordable housing for persons with disabilities, will continue operation. Four developments are in the planning stage.

The County, in a consortium with local communities, has secured Neighborhood Stabilization Program funds to develop housing for those with disabilities. One project is anticipated.

The County's Disabilities Services Division and the Housing Division Special Needs section will continue to make referrals to the County's Home Repair Program for construction management for architectural barrier removal for owner occupied and rental residential units.

THE County's Affordable Housing Trust Fund is prepared to assist affordable housing, if land sales are realized to capitalize the Fund.

With HOME resources, working with a CHDO and a private developer, the County plans to assist developing affordable units in 5 rental housing projects in 2011.

With the balance of funding in the County's Housing Organization Loan Fund, the County will assist in the development of a 20 unit affordable rent-to-own project.

In 2008, the County took delivery of an Analysis of Impediments. Recommendations with implementable actions have been accepted and will continue to be pursued.

The County will continue to work with municipalities to refine local fair housing ordinances.

The County strongly supports housing choice. Other recommendations in the Analysis of Impediments are under consideration, but they may transcend the County's ability to act, financially or legally.

Financial resources and housing market conditions are a prevailing factor and will impact every housing decision in 2011. At a time when financial resources, private and public (including federal, state and local), are unavailable, reduced, or threatened, maintaining existing efforts can be uncertain.

4. Evaluate and Reduce Lead Based Paint Hazards

Consolidated Plan reference: IV.G.

In addition to the actions identified in the Consolidated Plan, the County will:

1. Augment training of Home Repair and Rent Assistance staff who have received certification by the State of Wisconsin as Risk Assessors.
2. Implement Risk Assessments and clearance testing for units receiving funding through the Housing and Community Development Division.
3. Continue a program to increase the pool of lead trained and certified contractors by encouraging and subsidizing training costs and the purchase of lead treatment equipment.
4. Continue general education efforts on lead hazards and options for area municipal and non-profit agencies.

5. Develop Institutional Structure

Consolidated Plan reference: IV.I/J.

In 2011, the County will continue to work with its designated CHDOs. As housing market conditions allow, projects will be pursued.

6. Enhance Coordination Between Housing and Service Agencies

Consolidated Plan reference: IV.I/J.

In addition to the actions referenced, the County will continue to participate in the Safe Havens and Shelter+Care Programs, which provides rental assistance and inter-agency services for the chronically mentally disabled.

7. Foster Public Housing Improvements

Consolidated Plan reference: IV.K.

No other actions are planned in 2011.

8. Other Affirmative Marketing

Actions planned for 2011:

The County plans to continue its commitment to FHEO by participation in Fair Housing activities, appropriate advertising, and outreach to those less likely to participate in housing activities.

The County plans to continue its outreach and marketing to those with special needs, to encourage those in need of housing to participate in County assistance efforts.

The County plans to continue its outreach to landlords to encourage participation in the Rent Assistance Program.

VIII.F Narrative for Homeless and Other Special Needs

The County participates in the planning and implementation of the Milwaukee Continuum of Care.

The parts of the Continuum of Care Strategic Direction and the annual Associated Application that address the County's Housing Planning Area are incorporated by reference into the County's Consolidated Housing and Community Development Plan and the annual Action Plan.

The Continuum of Care: Gaps Analysis for Individuals and Persons in Families with Children are charts that are included in the annual Action Plan software package.

The narrative is found in the Continuum of Care Associated Application.

VIII.G Activities

Table 2C has been modified to show the proposed accomplishments in Year 1 for each of the specific objectives contained in the 2010 – 2014 Consolidated Plan.

Each activity funded under this Plan is described on the attached tables.