Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Table of Contents</td>
<td></td>
</tr>
<tr>
<td>2. Narrative Exhibits</td>
<td></td>
</tr>
<tr>
<td>A. Executive Summary</td>
<td>1</td>
</tr>
<tr>
<td>B. Threshold Requirements and Other Submissions</td>
<td>2-3</td>
</tr>
<tr>
<td>C. Need</td>
<td></td>
</tr>
<tr>
<td>i. Efforts to identify, address, mitigate, or remove barriers to affordable housing production and preservation</td>
<td>4-7</td>
</tr>
<tr>
<td>ii. Acute demand for affordable housing and remaining needs</td>
<td>7-9</td>
</tr>
<tr>
<td>iii. Key barriers to be addressed</td>
<td>9-11</td>
</tr>
<tr>
<td>D. Soundness of Approach</td>
<td></td>
</tr>
<tr>
<td>i. Vision</td>
<td>12-15</td>
</tr>
<tr>
<td>ii. Geographic Scope</td>
<td>15-16</td>
</tr>
<tr>
<td>iii. Key Stakeholders and Engagement</td>
<td>16-18</td>
</tr>
<tr>
<td>iv. Alignment with requirements to affirmatively further fair housing</td>
<td>19-24</td>
</tr>
<tr>
<td>v. Budget and timeline</td>
<td>24-26</td>
</tr>
<tr>
<td>E. Capacity</td>
<td></td>
</tr>
<tr>
<td>i. Capacity, Partner Capacity and Staffing Plan</td>
<td>27-31</td>
</tr>
<tr>
<td>F. Leverage</td>
<td></td>
</tr>
<tr>
<td>i. Leveraging other funds</td>
<td>32</td>
</tr>
<tr>
<td>G. Long-Term Effect</td>
<td></td>
</tr>
<tr>
<td>i. Permanent, long-term effects and outcomes</td>
<td>33-36</td>
</tr>
<tr>
<td>3. Budget</td>
<td></td>
</tr>
<tr>
<td>424-CBW budget form</td>
<td></td>
</tr>
<tr>
<td>4. Other Required Submissions</td>
<td></td>
</tr>
<tr>
<td>Standard Form 424 (SF-424)</td>
<td></td>
</tr>
<tr>
<td>Assurances (HUD 424-B)</td>
<td></td>
</tr>
<tr>
<td>Applicant Disclosure Report Form 2880 (HUD 2880)</td>
<td></td>
</tr>
<tr>
<td>Certification Regarding Lobbying</td>
<td></td>
</tr>
<tr>
<td>Disclosure of Lobbying Activities (SF-LLL)</td>
<td></td>
</tr>
<tr>
<td>PRO Housing Certifications</td>
<td></td>
</tr>
<tr>
<td>Code of Conduct</td>
<td></td>
</tr>
<tr>
<td>Letter of Commitment of Leveraged Funds</td>
<td></td>
</tr>
<tr>
<td>5. Attachments</td>
<td></td>
</tr>
<tr>
<td>Summary of Public Comments</td>
<td></td>
</tr>
</tbody>
</table>
Exhibit A: Executive Summary
A. Executive Summary

Historically, inequities have been driven by explicit and implicit racist policies and practices at the local, state and federal government levels to advantage white people and to disadvantage people of color. Specially, due to a legacy of broad discrimination in the housing sector, not all Americans enjoy the same opportunities when seeking affordable housing. A lack of affordable housing in Milwaukee’s suburban communities has exacerbated segregation and because of historical policies and practices, white families typically have much higher net wealth and incomes than families of color, which creates large differences in purchasing power.

In order to remove barriers to the development of affordable housing, the Department of Health and Human Services, Housing Services, is submitting an application to the U.S. Department of Urban Housing and Development, PRO Housing application in the amount of $9,991,570. The proposed projects will meet the Housing Activities category of the Low- and Moderate- Income benefit National Objective. The proposal will increase the supply of affordable housing in Milwaukee County’s suburban municipalities. This project will also address to long standing issue of our community being one of the most segregated in the country.

This proposal focuses on the root causes of health disparities as the lack of housing is directly related to health outcomes. Housing is well understood to be an important social determinant of physical and mental health and well-being. It is expected the long-term effects of this proposal will lead to increases in health and educational outcomes; increased opportunity for families to create generational wealth; increased tax revenue; decrease exposure to environmental toxins; as well as increased health for vulnerable populations.

Milwaukee County Housing Services has vast experience and success in implementing and administering grant programs and has been extremely successful with producing affordable housing. Since 2008, MCHS has been part of creating over 500 permanent supportive housing units throughout Milwaukee County. All told, it operates around more than 3,000 housing units including about 1,000 for homeless and manages a $25 million annual budget. The MCHS also runs a supported apartment program and transitional housing programs.

MCHS will meet the urgent need of removing barrier to affordable housing, by contracting with developers to produce affordable single-family homes, produce affordable multi-family rental developments. In addition, MCHS will partner with community agencies to provide families with down payment assistance.
Exhibit B: Threshold Eligibility Requirements
B. Threshold Eligibility Requirements

Milwaukee County Department of Health and Human Services, Housing Division meets all threshold requirements to submit a grant application proposal to the U.S. Department of Housing and Urban Development Community Planning and Development, Pathways to Removing Obstacles to Housing (PRO Housing) grant solicitation, FR-6700-N-98.

1. Resolution of Civil Rights Matters

Milwaukee County Department of Health and Human Services, Housing Division has no outstanding or unresolved civil rights matters prior to the submission deadline.

a. Milwaukee County Department of Health and Human Services, Housing Division no charges, cause determinations, lawsuits, or letters of findings referenced in subparagraphs (1) – (5)

   (1) Charges from HUD concerning a systemic violation of the Fair Housing Act or receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair housing law proscribing discrimination because of race, color, religion, sex (including sexual orientation and gender identity), national origin, disability or familial status;

   (2) Status as a defendant in a Fair Housing Act lawsuit filed by the United States alleging a pattern or practice of discrimination or denial of rights to a group of persons raising an issue of general public importance under 42 U.S.C. 3614(a);

   (3) Status as a defendant in any other lawsuit filed or joined by the Department of Justice, or in which the Department of Justice has intervened, or filed an amicus brief or statement of interest, alleging a pattern or practice or systemic violation of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, the Americans with Disabilities Act, Violence Against Women Act, or a claim under the False Claims Act related to fair housing, non-discrimination, or civil rights generally including an alleged failure to affirmatively further fair housing;

   4) Receipt of a letter of findings identifying systemic non-compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974; Violence Against Women Act; or the Americans with Disabilities Act; or

   5) Receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law prohibiting discrimination in housing based on sexual orientation, gender identity, or lawful source of income.

2. Timely Submission of Applications

Milwaukee County Department of Health and Human Services, Housing Services has submitted the application prior to the October 30, 2023, due date.
3. Eligible Applicant

Milwaukee County Department of Health and Human Services, Housing Services is an eligible applicant in accordance with Section III.A of the NOFO, as we are a County government.

4. Number of Applications

Milwaukee County Department of Health and Human Services, Housing Services has submitted only one application.
Exhibit C: Need
C. Need

i. Efforts to identify, address, mitigate, or remove barriers to affordable housing production and preservation.

The Milwaukee County Department of Health and Human Services (DHHS), Housing Services (MCHS) takes great pride in our efforts to identify, address and remove barriers to affordable housing. One such effort is working with the community and stakeholders.

Milwaukee County is an Urban County Community Development Block Grant (CDBG) jurisdiction formed by a partnership of 15 suburban municipalities and Milwaukee County. As a CDBG recipient, MCHS completes a five-year Consolidated Housing and Community Development Plan as well as an annual plan. For the most current five-year Consolidated Plan, there were focus group held, surveys and public hearings to hear from Milwaukee County citizens, stakeholders and practitioners.

In an effort to increase public involvement in the development of the Consolidated Plan, Milwaukee County, along with West Allis and Wauwatosa, contracted with Community Planning and Development Advisors, LLC (CPDA) to conduct focus groups and an on-line citizen survey for stakeholders, practitioners and possible beneficiaries involved with the CDBG and HOME programs. In addition, in 2021, Milwaukee County adopted the Collective Affordable Housing Plan through a vote by the Milwaukee County Board of Supervisors.

This proposal was informed by Milwaukee’s Consolidated Plan Process and Community Development Alliance (CDA’s) affordable housing study. The priority of affordable housing is reinforced by nearly every City of Milwaukee Area Plan, the 1,200 surveys and dozens of community meetings that were part of the 2020-2024 Consolidated Planning process, and over 20 reports examining housing and public health in Milwaukee. The CDA plan had more than 70 experts in neighborhoods, housing, banking, healthcare, and dozens of other sectors that were convened during the process of developing the Plan to identify root causes and approaches to reach racial equity in homeownership and provide a quality affordable home for every family making $7.25 to $15 per hour (or approximately $15,080 to $31,200 per year). These approaches were then prioritized by stakeholders, and preliminary financial models were built to estimate costs and impact. The four priority Strategy Areas identified through this collective work are: 1) Systems to Increase Black & Latino Homeownership; 2) Systems to Preserve Black & Latino Homeownership; 3) Systems to Increase Affordability of Housing for Families Making $7.25 - $15 per hour; and 4) Systems to Preserve Affordable Housing for Families Making $7.25 - $15 per hour.

The adoption of this plan led Milwaukee County to focus on developing new single-family homes for first-time homebuyers in the King Park Neighborhood. Milwaukee County is currently constructing a new Health and Human Services campus in that neighborhood. Recognizing that housing is one of the main social determinates of health, Milwaukee County applied to the State of Wisconsin for capital funds for the development of these homes. The County was selected through a competitive process and received $6 million of Neighborhood Investment Funds to fund the project. The Milwaukee County Board also voted to execute contracts for Milwaukee
Habitat for Humanity, Inc. and Emem Group LLC to build up to 120 affordable homes in the King Park Neighborhood. All of the lots have been acquired for the project and Habitat for Humanity broke ground on the first homes in July 2023.

MCHS is continuously pushing our efforts to deliver on solutions in our jurisdiction. For example, MCHS was awarded $15 million in American Rescue Plan Act (ARPA) funds for affordable housing projects. The focus of this project is to increase the supply of affordable housing in Milwaukee County’s suburban municipalities. This project is operated in a similar fashion to the County’s existing HOME Program operated by the MCHS. ARPA funds are primarily used as gap financing for projects that have identified other sources of funding to be used as leverage including Low Income Housing Tax Credits. Any project that is funded at over $50,000 are brought for additional future approval from the Milwaukee County Board prior to fund disbursement. For real estate development projects, MCHS will put in place a developer agreement guaranteeing the affordability of rents for a 20-year period. To date, Milwaukee County has committed all $15 million to projects in five different suburbs. It also represents the first affordable projects ever funded by Milwaukee County in two of those communities.

The MCHS also received an additional $3 million in ARPA funding to rehabilitate foreclosed properties that Milwaukee County controls due to tax delinquencies. These homes are in high opportunity neighborhoods in suburban municipalities. MCHS partners with the Milwaukee County Treasurer, and the Milwaukee County Economic Development Division to rehabilitate these properties and prioritize the sale once completed to first time homebuyers. This initiative ensures anyone who loses their home in foreclosure will receive housing assistance and basic needs assistance as a part of the foreclosure process. Families receive a housing subsidy and assistance with finding alternative affordable housing. The MCHS will also expand its Opportunity Knocks program which pairs residents of the Community Reintegration Center with contractors to receive on the job training.

The above projects were decided up through an ARPA approval process, that brought subject experts from the community and County Departments that reviewed and scored proposed projects to be supported by ARPA funds. Both affordable projects were scored at 100% for high priority projects.

Currently, MCHS has utilized $2.5 million in partnership with Acts Homeownership Acquisition Fund with a goal of acquiring at least 100 properties this year and convert them into owner-occupied homes – with 80 percent of homeowners coming from communities of color. Instead of wealthy investors from Chicago or New York or Los Angeles buying up homes just to make a profit, the acquisition fund will help put Milwaukee’s housing stock back into the hands of Milwaukeeans. To date, 50 homes have been acquired through the program and 10 of those homes have already been sold to first time homebuyers.

The ARPA-funded projects are in the planning stage and will be completed by the end of 2026. The proposed PRO Housing program will align with this timeline to ensure that the proposed projects are completed by 2029.

The MCHS has a long history of partnering with developers to produce thousands of units of
affordable housing. The proposed project would be operated in a similar fashion to the County’s existing HOME Program operated by the MCHS. ARPA funds would primarily be used as gap financing for projects that have identified other sources of funding to be used as leverage including Low Income Housing Tax Credits. The main focus of this project would be to increase the supply of affordable housing in Milwaukee County’s suburban municipalities. This project will also address a long-standing issue of our community being one of the most segregated in the country.

Due to a legacy of broad discrimination in the housing sector, not all Americans enjoy the same opportunities when seeking affordable housing. A lack of affordable housing in Milwaukee’s suburban communities has exacerbated segregation and because of historical policies and practices, white families typically have much higher net wealth and incomes than families of color, which creates large differences in purchasing power. Across the country, opportunity significantly varies neighborhood by neighborhood (i.e., employment rates, school quality, poverty levels, income, crime, infrastructure, services, transit, health care, groceries, banks, etc.). High-opportunity neighborhoods offer children the best chance for upward mobility.

This proposal focuses on the root cause of health disparities as the lack of housing is directly related to health outcomes. Housing is well understood to be an important social determinant of physical and mental health and well-being. Affordable housing alleviates crowding and makes more household resources available to pay for health care and healthy food, which leads to better health outcomes. High quality housing limits exposure to environmental toxins that impact health. Stable and affordable housing also supports mental health by limiting stressors related to financial burden or frequent moves, or by offering an escape from an abusive home environment. Affordable homeownership can have mental health benefits by offering homeowners control over their environment. Affordable housing can also serve as a platform for providing supportive services to improve the health of vulnerable populations, including the elderly, people with disabilities, and homeless individuals and families. Safe, decent, and affordable housing in neighborhoods of opportunity can also offer health benefits to low- and moderate-income households.

Pew Charitable Trusts has covered extensive research on the link between housing and health. For most Americans, a home provides safety, security, and shelter. Housing typically represents a family’s single largest expenditure and its major source of wealth. And statistics show that people in the United States spend about 90 percent of their time indoors – with an estimated two-thirds of that spent in the home.

It is not surprising, then, that housing-related factors have the potential to help—or harm—the health of Americans in significant ways. Research suggests that housing should be an important consideration in efforts to address complex and urgent health concerns such as child mortality and the rise in preventable pregnancy-related deaths in the U.S. over the past 30 years.

Policymakers, community-based groups, government agencies, and health providers increasingly recognize housing as a key driver of health outcomes. For example, in December 2019, Delaware announced six evidence-based grants to community organizations aimed at narrowing
the state’s wide variance in birth outcomes between black women and white women; more than twice as many black infants die before their first birthday than white infants, according to Delaware’s vital statistics data. The grants were the first of their kind in the state; two specifically target housing issues as a root cause of infant mortality.

According to a study by Habitat for Humanity, homeownership promotes wealth building by acting as a forced savings mechanism and through home value appreciation. Homeowners make monthly payments that increase their equity in their homes by paying down the principal balance of their mortgage. Home value appreciation also helps homeowners build wealth by enabling them to realize greater proceeds if they sell the home or borrow against the additional equity.

In addition, owning a home promotes intergenerational homeownership and wealth building. Children of homeowners, transition to homeownership earlier — lengthening the period over which they can accumulate wealth — and have homeownership rates 25 percentage points higher than the rate of children of renters. For every dollar in net wealth accumulated by a high-income household, a low-income household amasses seven cents. This wealth gap has significantly widened over the past decade. Homeownership is a substantial contributor to the wealth of low-income households since they hold most of their wealth in their homes. Low-income homeowners with sustained ownership and affordable loans have higher wealth accumulation — both housing and non-housing wealth — than comparable renters.

Milwaukee County’s vision is to be the healthiest county in Wisconsin by addressing racial equity and we have developed a strategic plan that focuses on addressing the root causes of racial inequities. This effort aligns with the Milwaukee County’s strategic focus activity of applying a racial equity lens to all decisions and investing “upstream” to address root causes of health disparities.

Milwaukee County employs a Housing First philosophy, which provides housing to those most in need without pre-condition. This is because we have found that most vulnerable in our community can only solve one life-changing problem at a time. Providing a home first offers individuals stability to focus on other issues such as employment and child and medical care.

Milwaukee County has made large policy changes due to its focus on racial equity. The Milwaukee County overall budget process has been using a racial equity lens for decision making. This focus on equity has increased funding to Housing Services in the 2022 and 2023 budget as Milwaukee County sees the foundation of housing as one of the main social determinates of health. This additional funding has allowed MCHS to offer additional housing resources to those wanting to move to higher opportunity neighborhoods.

ii. Acute demand for affordable housing and remaining needs.

According to the PRO Housing Mapping Tool, published by HUD; Milwaukee County is a priority geography under this grant solicitation. Specifically, Milwaukee County, has a 0.90324 Housing Problem Factor measure of widespread housing cost burden or substandard housing, which is higher than the national threshold of 0.343937.
Housing stability is critical to dozens of quality-of-life measures, including employment, early childhood development, stress levels, education, and health. According to the CDA’s affordable housing study, families that have been excluded from economic opportunities spend 60% of their income on housing, forcing them to compromise other critical household expenditures such as food, clothing, transportation, and healthcare. By reviewing neighborhood quality of life plans and survey data, two major themes of the study were prevalent. First, homeownership is a priority for Black and Latino families. Second, housing needs to be affordable in the context of the incomes of people that live in Milwaukee neighborhoods. An extensive review of data confirms these priorities and highlights just how big the problem will continue to grow without intervention. Milwaukee needs systems that break down barriers to create opportunities for 32,000 new Black and Latino Homeowners to end racial disparities in homeownership. Milwaukee also needs to create or convert 32,000 additional rental homes in the $400 - $650 per month range, which is affordable to families making $7.25 to $15 per hour ($15,080 to $31,200 per year) to provide an affordable housing option for all Milwaukeeans.

For decades, the Milwaukee metropolitan region has been ranked among the most segregated communities in the country. The composition of Milwaukee County neighborhoods is complex, but generations of historically racist systems and polices undermined wealth, living opportunities, and overall quality of life for residents of color. The negative consequences of prior policies persist alongside ongoing systemic racism compounding insecurities for residents of color.

According to the US Census 2022: ACS 1-Year Estimates young families cannot afford to purchase homes in Milwaukee County, as the average value of a house is $250,000. The area median income of Milwaukee County is $58,214. Of 64,609 householders 65 years and older, 35,381 (54.7%) live under the median income level. As of 2022, Milwaukee County has 190,955 owner-occupied housing units (49%). Of those owner-occupied units, ownership demographics consist of 73.1 percent white, 9.7 Hispanic, 3.8 percent Asian, and 12.8 percent African American.

Predatory acquisition has targeted communities of color. As a result, Milwaukee has lost 1,000 homeowners of color each year since 2010. In majority Latino neighborhoods, homeownership is down 15% and for majority Black neighborhoods homeownership is down by 20%. The primary root cause of this devastating drop in homeownership and stability of neighborhoods is predatory acquisition, the targeting of communities of color by investors to flip owner occupied homes into rental assets for outside investors. There are over 17,000 Black and Latino families aspiring to purchase a home for $125,000 or less, unfortunately, there are only 1,500 available homes sold each year in this price range. Even worse, 40% of these homes are purchased by investors.

The Plan identifies the need to produce rental homes throughout the County, particularly rental homes that are $650/month or less. Current data indicates that there are about 70,000 families in Milwaukee County that earn $15/hour or less but only about 30,000 rental homes available to them. Consequently, there is a shortage of 40,000 units of available housing at $650/month or

1 US Census Bureau (2021) Selected housing characteristics, American Community Survey 2021 1-year estimates.
less. If you just look at suburbs in Milwaukee County, there is a shortage of 7,000 rental homes that are $650/month or less.

Housing Age: According to the US Census Housing Age data table of the 419,310 housing units; 39.7% were built pre-1940 and 87.40% were built pre-1980. The age of the homes in Milwaukee County portrays and aligns with the population age. Cost burdened older adults in Milwaukee County will benefit from this project that supports their independence by utilizing grant funding to make repairs and safety improvements they could not otherwise afford.

Housing Conditions: The American Housing Survey shows that, of the 382,000 estimated homes owned, over 7,000 homes have housing conditions that are described as moderately inadequate. American Housing Survey (AHS) - Housing conditions

Foreclosures. With the exception of properties located in the City of Milwaukee, all Milwaukee County tax foreclosures are handled by the Milwaukee County Treasurer’s Office. According to the Register of Deeds of Milwaukee County, there were 1,452 foreclosures in 2022, a 49% increase from the 743 foreclosures in 2021. Mortgage foreclosures on homeowners causes massive instability issues that impact educational, health, economic and other quality of life measures.

iii. Key barriers that need to be addressed to produce and preserve more affordable housing.

The barriers identified in Milwaukee County has been identified in the Regional Analysis of Impediments to Fair Housing\(^2\) that was released in October of 2020. It marked the first study in the history of our area that was done as a surrounding region to include counties outside of Milwaukee to ensure that affordable housing could be created in as many areas as possible. There were 15 barriers identified in the plan with 11 of them being recommendations for the Milwaukee County CDBG jurisdictions. These barriers were:

*Impediment 1: Lack of a Regional Housing Strategy or Plan.* Housing opportunity and choice is a regional issue that requires a coordinated regional solution. There has been a lack of coordination between local governments in Southeastern Wisconsin. Over several years, this has led to most of the affordable housing being developed in the City of Milwaukee.

*Impediment 2: Lack of Regionally Dispersed Affordable Housing.* This has been problematic for low to moderate income households who are looking to relocate to higher opportunity neighborhoods, especially when these families have jobs in other jurisdictions but cannot afford the housing costs. Correcting this impediment has been a main focus of Milwaukee County by dramatically increasing affordable housing in its suburban municipalities in 2023. This grant proposal will continue this effort.

*Impediment 3: Restrictive Local Land Use Regulations and Other Ordinances.* Local developers have historically had difficulty constructing multi-family housing in some communities in Milwaukee County mainly due to restrictions around parking and density. This has led to

\(^2\) Applied Real Estate Analysis, Inc. (2020) *Regional Analysis of Impediments to Fair Housing, Volume 1.*
developers to completely focus on certain suburban communities while ignoring others that are seen as too challenging. This has led to slower progress in solving Milwaukee County’s longstanding issue of segregation in our region.

**Impediment 4: Restrictive Zoning Regulations for Group Homes and Community Living Facilities.** Some communities in the Collaborative region continue to have zoning requirements that restrict the development or adaptive reuse of dwellings for persons with disabilities. These zoning requirements are currently being reviewed by Milwaukee County’s Department of Human Services who funds several providers in our community that provide housing and services for adults and children with disabilities.

**Impediment 5: Prevalent “Fear of Others” Exists among Residents, including NIMBYism.** Race and disability are the most frequently cited bases of housing discrimination complaints that are filed with the State of Wisconsin, HUD, and Milwaukee Metropolitan Fair Housing (MMFH) from the Collaborative area. Milwaukee County continues to contract with MMFH to provide education and training around fair housing issues in our jurisdiction. Milwaukee County views NIMBYism as one of the largest current barriers to affordable housing. We have seen projects that have been initially supported by suburban mayors and their common councils only to be later rejected due to neighborhood opposition. Milwaukee County has made recent strides in this area with our recent affordable housing ARPA investments in communities that have long been opposed to such projects.

**Impediment 6: Strong Jobs-Housing-Transit Mismatch.** During interviews and meetings, stakeholders repeatedly identified a mismatch between the locations of affordable housing and job centers across the region. Recommended actions to address this impediment include encouraging development of new affordable and/or mixed-income housing near job centers in communities throughout the Collaborative region and the facilitation of affordable and workforce housing development near existing and planned transportation facilities.

**Impediment 7: Lack of Fair Housing Guidance and Enforcement.** Surrounding counties outside Milwaukee County do not have any current enforcement of fair housing laws.

**Impediment 8: Lack of Accessible Housing for Persons with Disabilities.** Based on interviews and discussions with local housing advocacy groups and other stakeholders, accessible housing for persons with disabilities is limited in the Collaborative area, due in significant part to regulatory barriers and the age of the housing stock.

Recommended actions to address this impediment include using available federal resources to encourage new development and/or rehabilitation of existing housing to accommodate the needs of persons with disabilities and to encourage accessible housing development and availability, such as density bonuses for residential developments that include accessible units. Through its RFP for affordable housing ARPA funds, housing for persons with disabilities received additional points on their application. In 2023, this led to two additional projects for the target population.
Impediment 9: Gap in Homeownership by Racial and Ethnic Minorities. As discussed in this application, this impediment has been a major focus of Milwaukee County. Previous recommendations from the Impediments study recommended establishing a Housing Trust Fund similar to that implemented by the City of Milwaukee and Milwaukee County, as a new source of revenue to support affordable housing and that training/counseling programs should be made available to encourage current renters to become homeowners. These recommendations were put into place with Milwaukee County’s 2023 project to build over 120 homes in the King Park Neighborhood for minority first-time homebuyers. Households currently receiving rent assistance moving into these properties will be prioritized.

Impediment 10: Overcrowded Housing. Stakeholders expressed concern that low-income households (especially but not exclusively new immigrant households) are often overcrowded in the city and county of Milwaukee as households double up or have larger or extended families who share housing in part to reduce overall housing costs.

To address this issue, it was recommended the City and County of Milwaukee should direct public resources to increase the availability of large affordable housing units (i.e., 3- and 4-bedroom units) capable of accommodating larger households.

Impediment 11: Extensive Use of Evictions. The extensive use of evictions has long been an issue in Milwaukee County. Recommendations from the Impediments study were put into place to combat this problem. Two of the recommendations were that Milwaukee County should consider directing CDBG funds for legal assistance and that Community Advocates starts a tenant advocacy program. Milwaukee County has since used CDBG funds for the Legal Defense fund at Legal Action and Community Advocates now operates the Tenant Resource Center for tenant advocacy and mediation to avoid evictions. Milwaukee County also adopted and funded to Right To Counsel to ensure tenants going to eviction court had legal representation.
Exhibit D: Soundness of Approach
D: Soundness of Approach

i. Vision

In 2019, Milwaukee became the first jurisdiction in the nation to declare racism a public health crisis. In Milwaukee County, we are taking an all-hands approach to realizing our vision that by achieving racial equity, Milwaukee is the healthiest county in Wisconsin. Together we will dismantle institutional racism in our organization and build up policies, practices and a culture that ensures race no longer predicts health outcomes, and outcomes for everyone improve. Addressing social determinants of health remains our highest priority; including providing affordable housing.

Proposed activities are appropriate, given identified Need and applicant Capacity.

The proposed projects will meet the Housing Activities category of the Low- and Moderate-Income benefit National Objective. This National Objective qualifies activities that are undertaken for the purpose of providing or improving permanent residential structures will be occupied by LMI households. This proposal will provide $10 million of CDBG funds to be used toward increasing the supply of affordable housing in high opportunity neighborhoods.

MCHS’ CDBG jurisdiction has continued to prioritize the creation of affordable housing within its 2020-2024 Consolidated Plan and Annual Plan. There is a lack of affordable housing in Milwaukee’s Suburban communities that has exacerbated segregation within the whole of Milwaukee County.

MCHS intends to use a portion of the proposed funds to assist with the development and support of affordable multi-family housing units, with at least 20 percent of the units being leased to low- and moderate-income families. MCHS has a long history of partnering with developers to produce thousands of units of affordable housing. This project would be operated in a similar fashion to the County’s existing HOME Program operated by MCHS. PRO Housing funds would primarily be used as gap financing for projects that have identified other sources of funding to be used as leverage including Low Income Housing Tax Credits. MCHS continues to have a rolling Request for Proposals for qualified real estate developers. The department will primarily use this list to assist in the development of projects and will also prioritize the use of developers of color. The main focus of this project is to increase the supply of affordable housing in Milwaukee County’s suburban municipalities.

Proposed funds will be used to produce affordable single-family homes within the CDBG jurisdiction. To ensure that homes are affordable to residents, MCHS is currently working to create a Community Land Trust (CLT) that will be in place prior to receiving these funds. This will allow low- and moderate-income families to purchase the home, however the land will be owned by the CLT. This provides a process, allowing long-term affordable housing, in case a family decides to sell in the future. The targeted homes will be Milwaukee County Tax foreclosures that are in need of rehabilitation. PRO Housing funds will allow the County to bring these homes up to code and the County will facilitate the sale of the home to a qualified households and offer down payment assistance. MCHS will also ensure that any household that
Milwaukee County Housing Services  
PRO Housing Application  

loses their home in foreclosure will receive financial services for alternative housing as well any wraparound services that are needed for the families.

To assist with homeownership, a portion of the funds will be used for down-payment assistance. MCHS has worked in the past to provide down-payment assistance to first-time homebuyers that meet HUD income guidelines. MCHS has partnered with agencies to assist with homebuyer counseling, assistance with purchase process, financial planning and other services to potential buyers.

Since MCHS has years of experience operating these three proposed activities, the timeline of expected benefit can begin immediately upon the signing of a grant agreement. Milwaukee County currently has multi-family development proposals that need additional gap financing as well as an inventory of tax foreclosures. PRO Housing funds could be fully utilized by 2027.

*Proposal addresses key barriers to affordable housing production and preservation.*

The focus of this project would be to increase the supply of affordable housing in Milwaukee County’s suburban municipalities. This project will also address to long standing issue of our community being one of the most segregated in the country.

By creating additional housing opportunities within suburban Milwaukee County communities, it will lead to addressing barriers related to housing stability, homeownership opportunities and affordability. MCHS follows a “Housing First” model when it comes to working with families and clients. By providing sustainable and affordable housing options to families on the front end, it will lead to stability of employment, education, health and stress levels. Homeownership for families can be another barrier because of cost, location and opportunity. With a shortage of single-family properties available in today’s housing market and increasing interest rates, the cost of houses continues to exponentially increase. By creating additional housing stock in high opportunity areas, this will allow MCHS to prioritize selling homes that are creating and/or renovated to low- and moderate- income families at an affordable cost, especially using a CLT.

By utilizing funds from this proposal to assist homebuyers with down payment assistance, that will also assist with making homeownership an opportunity for families as well as making it affordable.

MCHS is taking a multi-strategy approach with the use of funds of this grant to provide affordable housing options to households that either rent or are interested in purchasing a home for the first time. Current renters do not have the ability to enter into home ownership due to the dramatic rise in costs. MCHS is in a unique position to execute the objectives of this grant as MCHS also administers the Milwaukee County Housing Authority. MCHS will focus on the expansion of our Housing Choice Voucher Homeownership Program and offer newly renovated single-family homes for our current voucher holders as well as down payment assistance.

To continue Milwaukee County’s efforts in providing access to housing in higher opportunity areas, the Housing Authority has applied for the Housing Mobility-related Services Notice of Funding Opportunity recently. If approved, this program will provide Housing Choice Voucher families with support and resources to move from low-income neighborhoods to higher
opportunity neighborhoods within Milwaukee County. The program will assist with moving costs, credit counseling and billing, housing navigation and supportive services acquisition. The program will also participate in landlord engagement outreach and will be able to provide incentives in efforts to recruit new landlord partners. These services will be provided in partnership with Milwaukee Metropolitan Fair Housing Council and will be able to serve up 400 families over a 5-year period of the grant.

Similar efforts and how lessons learned from those efforts have shaped your proposal.

MCHS has offered first-time buyer down payment assistance in the past on two different occasions. The program was successful and had assisted many families to be able to purchase a home for the first time. The down-payment assistance offered previously was a forgivable grant as well as a mortgage on the property. MCHS assisted through the homebuying process by completing housing quality standard inspections, lead risk assessments in addition to financial assistance. Although this program has shown success, it sunset due to a lack of funding. The previous lesson learned from the program is that it was difficult for families to afford the homes in our CDBG jurisdiction even with down payment assistance. This led to further concentration of lower income homeowners to particular neighborhoods. With this grant proposal, the MCHS will be able to produce its own inventory and with the CLT to ensure affordability in our entire jurisdiction.

MCHS has been very successful in the past year in building multi-family affordable housing in our jurisdiction using ARPA funds. MCHS has been able to leverage those funds to develop six new projects in suburbs that typically have not been open to affordable housing. The lesson learned is that Milwaukee County underestimated the amount of gap financing that is needed in the current financial environment to get these projects to completion. MCHS hoped to be able to support more projects with the $15 million that was allocated as there are more projects seeking funding. This grant proposal would allow us to continue our progress and fund these additional developments.

Proposal aligns with existing planning initiatives, services, other community assets.

Milwaukee County’s CDBG jurisdiction has continued to prioritize the creation of affordable housing within its 2020-2024 Consolidated Plan and Annual Plan. There is a lack of affordable housing in Milwaukee’s Suburban communities that has exacerbated segregation within the whole of Milwaukee County. Milwaukee County continues to prioritize the need for affordable housing options in suburban communities.

As an Urban County and Home Consortia, Milwaukee County continues work towards increasing the supply of decent affordable housing, provide services to selected low- and moderate-income population, improve and develop infrastructure, develop the economy and employment, and provide strong program planning and administration.

Housing census data and results of a community needs survey indicated a high need for an emphasis on decent, safe and affordable housing within the communities of the Milwaukee Urban County.
The majority of housing is single-family homes. Most renter units have 1 or 2 bedrooms, but a high percentage (78%) of homeowner housing have three or more bedrooms. As the population ages, there is a greater need to make this housing accessible and to maintain the quality of an aging housing stock. There is also a need to create more rental housing options for the elderly/disabled and for low- and moderate- income households employed in suburban communities, especially for those with large families.

This proposal aligns with the recent expansion of transportation services for low-income City of Milwaukee residents to get to places of employment located in the suburbs. The micro-transit service connecting Milwaukee residents to jobs in suburban communities called FlexRide is planning to expand its service area this year with an already approved ARPA allocation from Milwaukee County. The service is considered a “last-mile solution” for City of Milwaukee residents, connecting riders to jobs or destinations beyond the Milwaukee County Transit System service area. This project is in collaboration with the Southeastern Wisconsin Regional Planning Commission. The need for this transportation service underscores the lack of affordable housing in our suburban communities as low-income families currently have a large transportation burden to get to places of employment in our suburban municipalities.

ii. Geographic scope

The targeted geographic scope of this proposal is the suburban areas of Milwaukee County. Specifically, MCHS will target tax foreclosures from Milwaukee County Treasurer's Office that will then be rehabilitated and sold to low- and moderate- income families. Currently Housing Services is working on renovating foreclosed homes in the cities of Glendale and Greendale.

Through the RFP process, high opportunity areas and focusing on accessibility will be prioritized. MCHS will provide developers an inventory of developable land that is suitable for affordable, high density, multi-family housing.

The map from Metropolitan Milwaukee Fair Housing Council (MMFHC)\(^1\) below details the areas of high opportunity areas within Milwaukee County, as show, the suburban areas of those of most opportunities. This, compared to the adjacent map, shows high opportunity zones are completely reversed compared to the areas where African American Milwaukee County residents reside.

---

\(^1\) About Opportunity MKE | Fair Housing Council (fairhousingwisconsin.com)
iii. Key stakeholders and Engagement

The MCHS is continuously working on better coordination and cooperation with other government entities, county departments, and private entities. Milwaukee County is an active participant in the Intergovernmental Cooperation Council, a group of Milwaukee County municipalities active in local governmental cooperation and coordination.

In an effort to increase public involvement in the development of the Consolidated Plan, West Allis, Wauwatosa, and Milwaukee County contracted with Community Planning and Development Advisors, LLC (CPDA) to conduct focus groups and an on-line citizen survey for stakeholders, practitioners and possible beneficiaries involved with the CDBG and HOME programs.

Milwaukee County/Urban County and Milwaukee County Consortia invited more than 120 stakeholders/practitioners to participate in focus groups to discuss strengths, weaknesses of previous Con Plan and needs and priorities for next 5-year Con Plan. A complete overview and summary analysis of the focus groups is provided in an attachment to this Plan.

Agencies, groups, and/or organizations that participated in the focus groups to provide feedback in creating goals for the 2020-2024 Consolidated Plan included the City of Cudahy, City of Franklin, City of Glendale, City of Oak Creek, City of Greenfield, City of South Milwaukee, City of St Francis, City of Wauwatosa, City of West Allis, Village of Fox Point, Village of Bayside, Village of Hales Corners, Village of Shorewood, Village of West Milwaukee, Village of Whitefish Bay, Village of Brown Deer, Bayside Middle School, Lake Drive Baptist Church,
Jewish Family Services, Inc., Community Advocates, Inc., Catholic Charities Milwaukee, Hunger Task Force, Milwaukee County Parks and Recreation and the Milwaukee County Department of Aging, Project Concern, Clare Meadows Senior Apartments, Franklin Senior Dining, Eras Senior Network, Inc., Pathfinders Milwaukee, Whitefish Bay Civic Foundation, Merchants of Whitefish Bay WFBBID, Metropolitan Milwaukee Fair Housing Council, HR Housing, Inc., IMPACT Seven, Inc., Southeast Wisconsin center for Independent Living, South Milwaukee Senior Center, Milwaukee County Office for Diversity, Equity and Inclusion and the City of Milwaukee Health Department.

The MCHS participates in several community groups to ensure coordination. The County is active in the Continuum of Care, Commission on Supportive Housing and the Milwaukee County Mental Health Redesign Committee. The Housing Administrator is a member of the Funding Committee and the Executive Committee of the CoC. Funding recommendations and CoC policy are discussed and voted on in these two committees.

Key stakeholders and conducted outreach in developing this proposal.

The MCHS is an active participant in the Intergovernmental Cooperation Council, a group of Milwaukee County municipalities active in local governmental cooperation and coordination. As a participant, municipal leaders are provided with updates regarding HOME and CDBG funding. These updates include progress on goals noted in the Consolidated Plan and specific to Housing efforts within suburban Milwaukee County.

MCHS has also received support for affordable housing initiatives from the County Executive, County Board of Supervisors and the Department of Health and Human Services. All recognizing the need for more affordable housing opportunities for low- and moderate-income families within Milwaukee County’s jurisdiction.

This grant proposal expands the work the County has done through its ARPA allocations. Through many community listening sessions and the work of the Milwaukee County ARPA Task Force, the use of ARPA funds for affordable housing was seen as a priority by members of the community. This led to over $20 million of funds going to expand housing opportunities to low to moderate income households.

Specific actions taken to solicit input from and collaborate with stakeholders in developing this application.

The MCHS utilized prior community engagement feedback through the Milwaukee County ARPA Task Force to seek additional funding for the prioritized category of the creation of additional affordable housing units in our suburban municipalities. Milwaukee County also coordinated its application with the City of Milwaukee to ensure there is strategic alignment between the City of Milwaukee and Milwaukee County.

The proposed affordable housing projects under the PRO Housing application align with the ARPA – approved projects and the Collective Affordable Housing Plan discussed earlier. Community engagement, direct community input on participating in the ARPA subgroup
determined the priority projects to move forward. All Milwaukee County Finance Committee and full Milwaukee County Board Meetings are open for public comment.

MCHS also conducted outreach to developers, finance agencies, and contractors that we have engaged with through the ARPA process to ensure strategic alignment. The large focus of our application on multi-family housing units was due to the feedback from these groups. The ability of producing affordable units in suburban communities continues to become more difficult as the need for additional gap financing becomes more apparent.

MCHS also has a Resident Advisory Council made up of formerly homeless individuals that are currently in our housing programs. The Council makes policy recommendations for MCHS and one of the main focus areas is the lack of affordable rental units in our suburban communities.

The MCHS is holding a public hearing and publishing the Pathways to Removing Obstacles (PRO Housing) grant proposal. A digital copy will be available for review during the publication period at https://county.milwaukee.gov/EN/DHHS/Housing. In addition, public comments can be made in person, on Tuesday, October 17, 2023, between 1:00 and 2:00 p.m. at 600 West Walnut Street, Suite 100, Milwaukee, WI 53212. Comments can be emailed to Diane Tsounis, Housing Program Manager for CDBG and HOME at diane.tsounis@milwaukeecountywi.gov or mailed to Milwaukee County Housing Division located at 600 West Walnut Street, Suite 100, Milwaukee, WI 53212. All public comments will be considered when submitting the final application.

Input incorporated from stakeholders into our proposal.

Community input during the APRA projects scored Affordable Housing and rehabilitating foreclosed properties as both high-priority projects (100%). With previous data taken during the CDBG/Home annual report and the Consolidated Plan, the proposed PRO Housing programs are fully aligned with the community and stakeholders are prioritizing as projects to reduce barriers to affordable housing.

Strategies to encourage public participation, build support, and engage community members, including those most likely to benefit from your proposed activity.

MCHS participates in many community groups, provides information on public participation via Milwaukee County MCHS website, newspaper advertisements, flyers soliciting input distributed to municipal libraries, seats of government, community and senior centers, and other public places.

DHHS, including MCHS, recently completed their 2020 – 2025 DHHS Strategic Plan: Creating Healthy Communities. This document is a culmination of years of planning for the DHHS Future State, which began pre-pandemic in 2019. Input was sought from internal and external stakeholder groups, taking many perspectives into consideration. This plan outlines how DHHS will achieve the department’s mission: Empowering safe, healthy and meaningful lives. DHHS leaders have learned that changes and collaborations that are required by the Strategic Plan move ‘at the speed of trust’. Intentional actions will be required by leaders to ensure development of trust between leaders and staff, DHHS and contractors, DHHS and community, and others.
iv. Alignment with requirements to affirmatively further fair housing.

In determining locations for the proposed projects, MCHS will enter into a Memorandum of Understanding (MOU) with the municipality that confirms their commitment to the terms and requirements to affirmatively further fair housing as laid out in the Cooperation Agreement. For example, any proposed project must meet the National Objective of Benefit to Low- and Moderate-Income Persons as well as meets one or more of the Goals and Objectives of the current Consolidated Plan.

The overall intent of the program is to rehabilitate, maintain, and expand the supply of decent, safe and sanitary housing within suburban Milwaukee County. Administrative control is exercised by the MCHS with the Home Repair Review Board having final policymaking and loan approval/denial authority.

MCHS will work with the 15 municipalities participating in CDBG and HOME to affirmatively further fair housing. Fair Housing is a key issue in the Cooperation Agreements that form the Urban County. This a great opportunity to work on fair housing issues and educate local elected officials.

MCHS continues to conduct fair housing training for municipal leaders as well as staff. Milwaukee County funds Metropolitan Milwaukee Fair Housing to assist municipalities and individuals overcome fair housing within Milwaukee County. MCHS offered additional assistance in the security deposit program which opened the program to more individuals. This is to encourage Section 8 clients and others to consider the suburbs as a place to live to increase the number of minorities in the suburbs.

Plans to remove barriers to the development of affordable housing in well-resourced areas of opportunity.

MCHS, under its FY 2020 CDBG Program Year, took the following actions to address obstacles to meeting the underserved needs: Continue to provide funds for housing for owner occupied and renter occupied units; continue to provide funds for new housing construction of owner occupied and renter occupied housing units that are decent, sound, affordable and accessible; continue to work on the foreclosed and abandoned housing issues to help strength neighborhoods vitality; continue to work on the removal of architectural barrier in the County’s older housing stock through rehabilitation; continue to fund rehabilitation program to help bring the older existing housing stock up to code standards; and, continue to fund activities that assist business, employment training, and career counseling. MCHS will continue to leverage its financial resources and apply for additional public and private funds.

Allocation priorities were the result of a great amount of consultation with communities as part of the consolidated plan process. Although housing values have increased slightly, foreclosures, tight credit markets, unemployment and the scarcity of available resources continue to be obstacles for LMI populations within Milwaukee County. An obstacle to addressing homeless needs is that most services and facilities are located in the City of Milwaukee, which falls outside the jurisdiction of the Urban County and HOME Consortium. Also, HUD rules preclude us from
helping a homeless population that is not addressed, the multiple families living in one household and those living in transitional housing. MCHS continues the long tradition of allocating 40% of funds to municipal projects for Urban County member communities.

Plans to remove barriers impeding the development of affordable housing that would promote desegregation. Addressing policies or practices that perpetuate segregation.

A lack of affordable housing in Milwaukee’s suburban communities has exacerbated segregation and because of historical policies and practices, white families typically have much higher net wealth and incomes than families of color, which creates large differences in purchasing power. Across the country, opportunity significantly varies neighborhood by neighborhood (i.e., employment rates, school quality, poverty levels, income, crime, infrastructure, services, transit, health care, groceries, banks, etc.). High-opportunity neighborhoods offer children the best chance for upward mobility. By focusing on the development of additional affordable units, Milwaukee County would be able to address these barriers.

Proposal will not cause affordable housing to be further concentrated in low-opportunity areas or in areas that already have ample affordable housing. Increase housing choice by expanding the neighborhoods in which residents who need affordable housing can live.

Milwaukee County as a whole along with MCHS has worked to prioritize the development and renovation of affordable housing units, both rental and owner occupied, in the suburban Milwaukee County communities. Milwaukee County had previously prioritized the use of ARPA funds for higher opportunity areas and that focus will continue with these funds. Through an RFP process, developers will receive higher application scores based on the locations of their developments. Our proposal for single family homes will also offer new homeownership neighborhood choices for City of Milwaukee residents as MCHS will have initial site control of the homes in high opportunity neighborhoods.

Addressing the unique housing needs of members of protected class groups, including persons with disabilities, families with children, and underserved communities of color.

Many of the 15 municipalities in the Urban County have begun updating their fair housing ordinances to ensure inclusion of all protected classes and compliance with State and Federal regulations. Updating these ordinances brings this issue in front of each local elected body and provides a venue for fair housing education and conversation. These discussions will hopefully lead to local changes that will remove the negative effects of policies that serve as barriers to affordable housing, including zoning ordinances.

MCHS would use the same approach as our recent ARPA RFP process. That process gave priority points for minority developers as well as a heavily weighted score to focus on units for persons with disabilities.

Addressing the issues identified in our jurisdiction’s most recent fair housing plan or plans.

MCHS will work with the 15 municipalities participating in CDBG and HOME to affirmatively further fair housing. Fair Housing is a key issue in the Cooperation Agreements that form the
Urban County. This a great opportunity to work on fair housing issues and educate local elected officials. Within the Cooperation Agreement, Milwaukee County asks that each municipality selection items from the list of impediments to affirmatively further fair housing during the duration of each Cooperation Agreement. Municipalities can choose from the following:

- Provide MCHS and make available to developers an inventory of developable land that is suitable for affordable, high density, multi-family housing.
- Provide a list to MCHS annually of all Tax Incremental Financing (TIF) Districts that will terminate within the next five years and plans to extend the TIF to created affordable multi-family housing.
- Work with the Southeast Wisconsin Regional Plan Commission and/or Metropolitan Milwaukee Fair Housing Council to review and revise ordinances to remove barriers to affordable housing. Zoning ordinances, building ordinances, and fair housing ordinances are examples of the types of ordinances that may impact housing.
- Make changes to zoning districts to better connect transportation to areas zoned for multi-family housing.
- Work with Milwaukee County’s Housing Choice Voucher Program to identify and outreach to landlords in the municipality to encourage participation in the Housing Choice Voucher Program and provide landlords with fair housing information.
- Train elected officials serving on the governing board (common council/board of trustees) and volunteers serving on the plan commission, board of appeals, and other bodies impacting housing in fair housing laws and the requirement to affirmatively further fair housing.
- Train “first point of contact” staff to ensure that persons requesting assistance for possible fair housing violations obtain timely and accurate information from anyone who may answer a phone or field fair housing inquiries from the public.
- Any other activity listed in the recommendations section of the Regional Analysis of Impediments to Fair Housing (October 2, 2020, edition and any updated Analysis) with approval from Milwaukee County MCHS.

**Risk of displacement associated with your proposal.**

MCHS does not anticipate any displacement associated with this proposal. Grant funding will support the renovation activities will be on unoccupied housing units. New construction activities within this proposal will be of single-family homes and construction of multi-family housing developments.

**Addressing the housing needs of people with disabilities and increase their access to accessible and affordable housing.**

MCHS and any participating municipality will comply with section 109 of Title I of the Housing and Community Development Act of 1974, and the implementation of regulations at 24 CFR part 6 that incorporates Section 504 of the Rehabilitation Act of 1973, and implementation of regulations at 24 CFR part 8, Title II of the Americans with Disabilities Act, and the regulations at 28 CFR part 35 of the Age Discrimination Act of 1975, and the implementation of the
Milwaukee County Housing Services
PRO Housing Application

regulations at 24 CFR part 146 and Section 3 of the Housing and Urban Development Act of 1968.

MCHS has continued several partnerships in the last few years to address the need for affordable housing for several populations including persons with disabilities, special needs populations, and the elderly. MCHS will continue partner with other County Departments, municipal partners, and private developers.

*Implementation and/or enforcement plan for your proposal.*

MCHS has partnered with suburban communities and municipal leaders to support and create housing opportunities. Along with municipal leaders, MCHS has the support of the County Executive and the County Board of Supervisors.

In MCHS’ CDBG/HOME programming, the MOUs are utilized with municipalities and the appropriate use of funds. It has been determined this is a best practices and MOUs with municipalities for PRO Housing funds will be the same.

With each of the rental developments created, a separate development agreement is put in place between MCHS and the developer to include the following: type and number of units, tasks to be performed, a project specific timeline, budget, income determinations, underwriting and/or subsidy layering guidelines, rehabilitation standards, and affordability requirements. The agreement would also include language relating to compliance with section 109 of Title I of the Housing and Community Development Act of 1974, and the implementation of regulations at 24 CFR part 6 that incorporates Section 504 of the Rehabilitation Act of 1973, and implementation of regulations at 24 CFR part 8, Title II of the Americans with Disabilities Act, and the regulations at 28 CFR part 35 of the Age Discrimination Act of 1975, and the implementation of the regulations at 24 CFR part 146 and Section 3 of the Housing and Urban Development Act of 1968.

As part of the process, MCHS staff will work in conjunction with the developer to ensure compliance with Part 58 regulations related to the environmental reviews. Housing Services staff continues to partner with local and regional HUD CPD staff on the Part 58 process.

*Equity-related educational resources, tools, or public input that have informed your proposal.*

The Milwaukee’s first Collective Affordable Housing Plan is completely based on equity-related resources such as data and analysis, neighborhood quality of life places, literature review of past research and public input. Through extensive research, the Collective Affordable Housing Plan detailed the root causes of inequity in affordable housing in Milwaukee County, and their proposed systems to implement to reduce such disparities.

In 2021, the CDA worked with over 100 stakeholders to produce Milwaukee’s first Collective Affordable Housing Plan. The Plan has been endorsed by the Milwaukee County, City of Milwaukee, Greater Milwaukee Foundation, Zilber Family Foundation and many more. In addition to supporting the Collective Affordable Housing Plan, the County has been a leader in the development and implementation of the 10-Year Plan to End Homelessness.
Engage and support minority-, women-, and veteran-owned businesses during proposed housing production process.

MCHS continues to have a rolling Request for Proposals for qualified real estate developers. Housing will primarily use this list to assist in the development of projects and will also prioritize the use of developers of color. MCHS also partners with the Office of Economic Inclusion that also works with targeted, small and Disadvantaged Business Enterprise programs.

Other equity considerations informed by local circumstances.

Milwaukee County’s vision is “by achieving racial equity, Milwaukee will become the healthiest county in Wisconsin”. The Milwaukee County Office of Equity, formerly the Office on African American Affairs, brings a higher level of leadership, expertise and accountability to advance the county’s strategic goals of creating intentional inclusion, bridging the gap and investing in equity to help fulfill this vision. It provides advice, guidance and technical assistance to county leaders, divisions, boards and commissions, and municipalities to analyze policies, programs and initiatives to advance a more equitable community – one in which race no longer predicts health and quality of life outcomes but rather these outcomes improve for everyone.

Evaluate the effect of your proposal on promoting desegregation, expanding equitable access to well-resourced areas of opportunity, and furthering the de-concentration of affordable housing.

Milwaukee County had created strategic objectives to support historically underserved, marginalized and/or adversely affected groups. The three strategic objectives that Milwaukee County is striving toward are: to achieve racial and health equity, to dismantle barriers, and to invest “upstream” to address root causes of health. Milwaukee County has recently approved additional ARPA funds to evaluate all its investments into affordable housing to prove the effectiveness of investing in housing to improve overall health outcomes. MCHS will use this already in place evaluation approach for this grant opportunity.

Track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities.

In tracking our progress of the effectiveness of our efforts to advance equity, we look at the number of affordable housing rentals created, how many foreclosed properties were rehabilitated and made into single-family homes, as well as how many families received down payment assistance. This is measured by the number of MOUs signed with municipalities and the number of developers and community agencies contracted.

Program affirmatively marketed broadly throughout the local area and nearby areas.

Outreach to potential developers of multi-family housing will be done through a similar Request for Proposal that MCHS conducted for ARPA funds. This RFP is done in collaboration with the Community Development Alliance (CDA), a non-profit housing advocacy group focused on affordable housing. CDA markets the RFP in publications, but also conducts community engagement services in underserved communities through an existing contract with Milwaukee County.
Opportunities for home ownership will be marketed directly to participants in Milwaukee County’s Housing Choice Voucher program as well as an expanded partnership with local non-profit Homebuyer Counseling Agencies.

v. Budget and timeline

The budget is broken down for the three primary projects in this proposal. They are broken down as follows.

1. Affordable Multi-Family Rental Developments. A total of $7,000,000 is budgeted to support affordable multi-family rental development ensuring that at least 20% of the units being leased to low- and moderate- families. MCHS is already working to identify potential affordable housing projects working with real estate developers. The additional funding will allow for these additional housing projects to begin in 2024. A detailed development agreement will be put in place between developers and Milwaukee County to ensure all regulations are followed and affordability guidelines are met.

2. Affordable Single-Family Homes. A total of $1,995,000 is budgeted to support the creation of affordable single-family homes. MCHS will work with the County’s Treasurer’s Office to renovate foreclosed properties within suburban communities. These foreclosed homes will be renovated and brought to code then sold to income qualified households. With the funds allocated, Housing staff anticipates creating 15 homes. In addition to renovating foreclosed properties, Housing will also work with municipalities to create new construction homes.

3. Down Payment Assistance. A total budget of $495,000 will be used to provide down-payment assistance to potential homebuyers. The MCHS has partnered with two non-profits organizations to provide financial counseling, homebuyer counseling and purchase assistance to potential homebuyers. MCHS will provide funds to families who will be purchasing the new and/or renovated single-family properties noted above.

4. Administration. A total of $455,973 is budgeted toward administrative and planning costs. Administrative costs include, but not limited to, salaries, wages, and costs related to program management, monitoring and evaluation. Planning costs include, but are not limited to, reporting, community development plans, capacity building, environmental reviews/studies, and functional plans.

5. Indirect Costs. A total of $45,597 is budgeted for indirect costs. Indirect costs are calculated using the 10% de minimus rate based on the Modified Total Direct Cost (MTDC) base of $455,981. This base includes all direct salaries and wages, applicable fringe benefits, travel.

Managing a successful project if HUD awards a different dollar amount than you are requesting.

MCHS is proposing three different projects in the overall collective housing plan of Milwaukee County. Given that, if we are to receive less funds that requested, we will be able to strategically determine which project(s) should be scaled back.
If this proposal is not fully funded, MCHS will reevaluate the housing activities within the proposal based on need for the duration of the grant. To maximize use of funds, Housing will aim to prorate the award to provide all housing activities on a smaller scale.

<table>
<thead>
<tr>
<th>Program</th>
<th>Activities</th>
<th>Milestones</th>
<th>Anticipated Completed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Multi-Family Rentals</td>
<td>Work with municipalities and County staff</td>
<td>Identify property for development</td>
<td>6/1/2024</td>
</tr>
<tr>
<td></td>
<td>Complete environmental review process and pre-development inspections</td>
<td>Reviews/inspections completed</td>
<td>9/1/2024</td>
</tr>
<tr>
<td></td>
<td>Complete construction and obtain occupancy permit</td>
<td>Construction completed</td>
<td>3/1/2027</td>
</tr>
<tr>
<td></td>
<td>Lease up of units created</td>
<td>Leases complete and units occupied.</td>
<td>6/1/2027</td>
</tr>
<tr>
<td></td>
<td>Final round of RFP, if funds remain</td>
<td>Final Projects chosen</td>
<td>8/1/2027</td>
</tr>
<tr>
<td></td>
<td>Funds expended</td>
<td>Final draw from category</td>
<td>6/1/2029</td>
</tr>
<tr>
<td>Affordable Single-Family Homes</td>
<td>Identification of properties</td>
<td>List of foreclosed homes from County Treasurer</td>
<td>6/1/2024</td>
</tr>
<tr>
<td></td>
<td>Complete initial inspections, environmental review and scope of work</td>
<td>Identify work to be completed for each property</td>
<td>9/1/2024</td>
</tr>
<tr>
<td></td>
<td>RFP for contractors</td>
<td>Complete RFP Process</td>
<td>1/1/2025</td>
</tr>
<tr>
<td>Task</td>
<td>Description</td>
<td>Date</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>Review of proposals received, award project to contractor, and complete agreement process</td>
<td>Contractors chosen for rehabilitation for homes</td>
<td>5/1/2025</td>
<td></td>
</tr>
<tr>
<td>Monitor projects in progress, final inspections once work is completed, payment to contractor</td>
<td>Projects progressing with work needed. Payments issued to contractors</td>
<td>10/1/2025</td>
<td></td>
</tr>
<tr>
<td>Selection of homebuyer and completion of purchase process</td>
<td>Property closing completed</td>
<td>12/1/2025</td>
<td></td>
</tr>
<tr>
<td>Full rehabilitation of homes</td>
<td>All properties renovated and occupied by homebuyer</td>
<td>12/31/2027</td>
<td></td>
</tr>
</tbody>
</table>

### Down Payment Assistance (DPA)

<table>
<thead>
<tr>
<th>Task</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marketing Outreach plan</td>
<td>Conduct outreach regarding availability of funds</td>
<td>6/1/2025</td>
</tr>
<tr>
<td>RFP for vendor</td>
<td>Complete RFP process for DPA vendor</td>
<td>9/1/2025</td>
</tr>
<tr>
<td>Review of proposals received, award project to vendor, and complete agreement process</td>
<td>Vendor chosen to assist with homebuying process</td>
<td>12/1/2025</td>
</tr>
<tr>
<td>Implementation of DPA process by vendor</td>
<td>Work with potential homebuyers on purchase process</td>
<td>1/1/2026</td>
</tr>
<tr>
<td>Selection of homebuyer and completion of purchase process</td>
<td>Property closing completed</td>
<td>4/1/2026</td>
</tr>
</tbody>
</table>
Exhibit E: Capacity
E. Capacity

i. Capacity, Partner Capacity and Staffing Plan

*Lead Agency, role and management capacity.*

The Department of Health and Human Services (DHHS), Housing Services (MCHS) will *lead implementation* of the proposed activities. The MCHS was created in 2008 (out of several programs that were scattered throughout multiple departments in an uncoordinated manner) in response to a growing community awareness of the deplorable conditions individuals who had mental illness had been residing in. Since 2008, MCHS has been part of creating over 500 permanent supportive housing units throughout Milwaukee County. All told, it operates around more than 3,000 housing units including about 1,000 for homeless and manages a $25 million annual budget. The MCHS also runs a supported apartment program and transitional housing programs.

MCHS has vast experience and success in *implementing and administering grants* such as the CDBG, HOME, CoC and ERA grants, totaling over $100 million over the past several years. In addition, MCHS fulfills federal reporting requirements in several areas of the Division including Community Development Block Grant (CDBG) and HOME funds, Section 8 Rental Assistance, and all HUD funded homeless programs. The MCHS has recently received and implemented ARPA funding in the amount of over $24 million.

*Relevant project management, quality assurance, financial and procurement, and internal control capacity to quickly launch and implement a major project.*

Since 2005, MCHS has sponsored the production of well over 1,000 affordable units. James Mathy is the Housing Administrator for the MCHS and is an award-winning leader of innovative housing approaches. Mr. Mathy has 25 years of housing and supportive service experience and has been the champion of dozens of housing developments and approaches, including the Milwaukee County’s effort to end Chronic Homelessness. David Cialdini, the Senior Real Estate Project Manager for the MCHS, will also be heavily involved in this project. Mr. Cialdini is Milwaukee County’s Licensed Real Estate Broker and has 23 years of commercial real estate experience.

The MCHS is able *quickly launch and implement the proposed major projects,* as they already are in existence. The MCHS has received ARPA and Congressional Directed Spending for affordable housing projects (new construction and rehabilitation of foreclosures), as well as ARPA funding for rental assistance. MCHS previously went through the RFP process for developers and community agencies to contract with; the RFPs will be reopened to utilize the current federal funding request under this program.

The MCHS has a long history of partnering with developers to produce thousands of units of affordable housing. This project would be operated in a similar fashion to the County’s existing
HOME Investment Partnerships Program operated by Housing Services. Funds will primarily be used as gap financing for projects that have identified other sources of funding to be used as leverage including Low Income Housing Tax Credits.

Milwaukee County’s Office of the Comptroller handles all aspects of accounting including financial reports, payables, receivables and payroll. The Office of the Comptroller reports monthly to the County Board and the County Executive on conditions of outstanding contracts, county’s funds and claims payable from the funds. Milwaukee County has operations procedures in place to include assuring security and confidentiality of participant records; providing accounting internal controls; preparing and submitting monthly requests for reimbursements; and collecting data and preparing required documents. The accounting system is designed to track different program funding sources by account number. Expenses are charged to each program and cost allocated depending on which program is affected by the expense. Milwaukee County has a monthly review of expenditures and cost allocations to ensure accuracy. Financial statements are prepared, monthly and quarterly financial statements on the condition of finances are provided at regular county board meetings. In addition, the Comptroller’s Office conducts audits designed to evaluate the effectiveness, efficiency and regulatory compliance of county programs and operations and reports results to policy and administrative decision-makers and ensures the compilation of accounting transactions and the issuance of payment due to employees and vendors are accurate and timely. MCHS has a fulltime Senior Budget & Management Analyst who manages the MCHS on-site daily fiscal services. In addition, MCHS will work within the Milwaukee County ordinances and procurement requirements when contracting with housing developer of community agencies.

Leadership capacity and legal authority to effectively implement your proposed reforms.

Milwaukee County is the local government and has the leadership capacity and legal authority to implement our proposal. Through Milwaukee County Ordinances, and Wisconsin statutes, any contracts must be approved by the Milwaukee County Board. Prior to Board approval, grant awards and contracts are reviewed and approved by the Finance Committee and sent to full board for approval.

In addition, Milwaukee County maintains fair housing ordinances. Chapter 107 is the County Fair Ordinance. As stated, the intent is “to render unlawful discrimination in housing and to enact this chapter pursuant to the authority granted to counties by s. 66.1011, Wis. Stats. It is the declared policy of the county that all persons shall have an equal opportunity for housing regardless of sex, race, color, disability, religion, creed, national origin or ancestry, marital status of a person maintaining a household, lawful source of income, receipt of rental or housing assistance, age, sexual orientation, as defined in s. 111.32(13m), Wis. Stats., status as a victim of domestic abuse, sexual assault, or stalking, gender identity and gender expression, or status in a domestic partnership.

1 Chapter 107 - COUNTY FAIR HOUSING ORDINANCE | Code of Ordinances | Milwaukee County, WI | Municode Library
Wisconsin statute 59.42(2)b allows Corporation Counsel to prosecute and defend all civil actions. 107.07 ordinance says that these provisions are enforced by Corporation Counsel. 107.08 ordinance details the penalty if someone discriminates. For example, monetary penalty may be from $100 - $1,000; as well as $1,000,000 - $10,000,000 if there is a second violation within five years of the first violation.

Partner’s capacities and credentials related to its role in implementing the project.

A developer and community agency are not included in this proposal so that a developer and agency can be secured consistent with Milwaukee County procurement requirements. The MCHS continues to have a rolling Request for Proposal for qualified real estate developers. The MCHS will primarily use this list to assist in the development of projects and will also prioritize the use of developers of color. The focus of this project is to increase the supply of affordable housing in Milwaukee County’s suburban municipalities. This project will also address the long-standing issue of our community being one of the most segregated in the country.

The MCHS seeks partners who have experience in developing affordable and supportive multi-family properties to participate in the co-development of future projects within Milwaukee County. The Request for Qualifications will be utilized to pre-qualify and shortlist developers capable and experienced in the design, development, financing, and operational management of multi-family supportive housing. The shortlisted developers will be invited to develop a proposal to provide services.

Experience working with and coordinating partners in previous projects similar in scope.

Milwaukee County is a member of the CDA, an affiliation of community development funders and practitioners that has collaborated for more than a decade on neighborhood improvement efforts in Milwaukee. As stated previously, in 2021, the CDA worked with MCHS and other partners to create Milwaukee’s first Collective Affordable Housing Plan. In addition to Milwaukee County, other CDA members included the City of Milwaukee, the Wisconsin Housing & Economic Development Authority (WHEDA), the Greater Milwaukee Foundation, the Zilber Family Foundation, the Northwestern Mutual Foundation, Bader Philanthropy, LISC Milwaukee, Children’s Hospital of Milwaukee, the Greater Milwaukee Committee, and the Housing Authority of the City of Milwaukee. The CDA Executive Committee also includes resident liaisons from Metcalfe Park Community Bridges and the Southside Organizing Center. The goal of the plan is to advance racial equity by providing a quality affordable home for every Milwaukeean. The Plan utilized the Government Alliance on Race & Equity (GARE) framework for developing equitable policy which included an extensive engagement and data process. The Plan was developed with the input of nearly 100 organizations ranging from resident-based groups and community development corporations, to major financial and government institutions.

Application Authors and Reviewers

This proposal was written and reviewed by Milwaukee County staff. Specifically, Jim Mathy, Administrator, Milwaukee County MCHS, Milwaukee County; Diane Tsounis, Housing Program
Manager, Milwaukee County MCHS, Milwaukee County; and by Carla Fries, Senior Grant Analyst, Project Management Office, Milwaukee County.

*Experience working with civil rights and fair housing issues and designing or operating programs that have provided tangible reductions in racial disparities.*

Milwaukee County has a long-standing commission dealing with civil rights issues. The **Milwaukee County Human Rights Commission** is charged with receiving reports on all matters concerning the equal rights of all persons within the county and, after due deliberations and open hearings, advising the appropriate department or division of county government of the proper procedures for preserving the equal rights of persons as guaranteed by the law.

MCHS has partnered with the Milwaukee Metropolitan Fair Housing Council (MMFHC) for many years to ensure enforcement of fair housing laws as well as monitor all complaints. Milwaukee County continues to fund MMFHC through our annual CDBG allocation. Prompted by prevailing patterns of racial and economic segregation, widespread discrimination in the housing market and an inadequate number of fair housing enforcement agencies, 40 citizens organized the MMFHC in 1977. A private, non-profit, membership-based organization, MMFHC is comprised of men and women who share a desire to create open and inclusive communities throughout Wisconsin.

MMFHC clients experience high levels of success when seeking a legal remedy to discrimination they’ve faced. Of the thousands of complainants we’ve assisted, approximately 650 have chosen to file lawsuits. Of those 650, our clients have prevailed in all but 8 cases.

For four decades, MMFHC has established an impressive record of accomplishments and assumed a leadership role in the struggle for equal opportunity in housing. MMFHC staff provide technical assistance, training, and consultation services to the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Justice, the Federal Reserve Bank of Chicago, the National Fair Housing Alliance and private fair housing agencies throughout the United States, and other local, state and federal organizations. MMFHC has received two Best Practices Awards from HUD and was honored with a Trail Blazer Award by the Milwaukee Awards in Neighborhood Development Innovation program for its activities to address predatory lending practices.

Since 2012, MMFHC has implemented a project called Investigative Support for Testing and Enforcement Programs, which is designed to improve the quality and consistency of testing investigations and enforcement actions across the U.S. This project, which has been supported by numerous consecutive HUD grants awarded to MMFHC through a competitive process, provides intensive training and ongoing technical assistance to non-profit organizations that operate fair housing testing programs all over the country.

**Organizational Chart**

Below is the MCHS PRO Housing Organization Chart. **Mr. James Mathy, Housing Administrator**, will work with potential developers and municipalities on multi-family
developments ad well as provide overall supervision of staff and project status. Diane Tsounis, Housing Program Manager, will provide overall implementation and reporting for grant requirements. Ms. Tsounis will complete Environmental Reviews for each property (multi-family and single-family properties) and prepare and execute agreements with developers and contractors. Ms. Tsounis will ensure compliance with HUD and CDBG regulations. David Cialdini, Senior Real Estate Project Manager, will partner with the Milwaukee County Treasurer’s Office to identify single-family properties to be renovated, walk through properties with inspection staff to determine work to be completed. In addition, he will complete Environmental Reviews for each property (multi-family and single-family properties) and assist with contractor selection, implementing agreement with contractor, and payment process. Connor Goggans, Senior Real Estate Project Manager, will assist with the RFP process, complete Environmental Reviews for each property (multi-family and single-family properties) and prepares and executes agreements with developers and contractors. Jennifer Batchelor, Senior Budget & Management Analyst, will provide financial oversight of grant including set up with Milwaukee County’s accounting system, processing of payments to developers and contractors and monitoring staff-related costs. Richard Pufahl, Housing Inspector, and the new grant-funded Housing Inspector will assist with initial inspection of foreclosed properties, create scope of work for property and meet with contractors during bid process, assist with agreement process and will complete progress and final inspections.
Exhibit F: Leverage
F: Leverage

**Leveraging other funding**

MCHS is committed to leveraging over $26 million in other funding to support this program. Below is the breakdown of leveraged funding. Executive Director of Housing, James Mathy, has signed a letter of commitment regarding these funds. The leveraged funding supports to Milwaukee County’s overall Housing Collective of support.

- 15 million in ARPA - The Affordable Housing Development project increases the supply of affordable housing in Milwaukee County’s suburban municipalities and is operated in a similar fashion to the County’s existing HOME Program operated by the Housing Division. ARPA funds are used as gap financing for projects that have identified other sources of funding to be used as leverage including Low Income Housing Tax Credits. The proposed program funding completely aligns with this current work, and additional funding will allow for the much needed affordable to be produced.

- $3 million in ARPA - The Foreclosure Rehabilitation project rehabilitates foreclosed properties that Milwaukee County controls due to tax delinquencies. The Housing Division partners with the Milwaukee County Treasurer, and the Milwaukee County Economic Development Division to rehabilitate these properties and prioritize the sale once completed to first time homebuyers and when possible prioritizing BIPOC homeownership. This initiative ensures anyone who loses their home in foreclosure receives housing assistance and basic needs assistance as a part of the foreclosure process. The proposed program funding completely aligns with this current work, and additional funding will allow for the much-needed foreclosed properties to be rehabilitated and purchased by Milwaukeeans and not out-of-state investors.

- HUD Congressional Directed Spending Award $5M - Provide targeted opportunities for first-time homebuyers to purchase County foreclosed homes in suburban municipalities. Funds would be used to rehab the properties and provide down payment assistance to low/moderate income households, specifically those previously on Section 8 rental assistance. The proposed down payment assistant aligns with this current funding and will allow additional families to be able to secure down payment funding to be able to purchase the foreclosed housing that has been rehabilitated.

- $3 million in HOME Entitlement – MCHS utilizes HUD Entitlement funds to increase the supply of affordable housing in Milwaukee County’s suburban municipalities. HOME funds are used as gap financing for projects that have identified other sources of funding to be used as leverage include Low Income Housing Tax Credits.
Exhibit G: Long-Term Effect
G: Long-term Effect

Achievements upon completion of grant funding activities.

The overall vision of Milwaukee County is “By achieving racial equity, Milwaukee is the healthiest county in Wisconsin.” Racial equity will be achieved when race no longer predicts health outcomes and outcomes for everyone improve. To achieve this, we must focus upstream on strategies that prevent poor outcomes for everyone in our community. This proposal advances our strategic plan by identifying developers and contractors that will deliver the following:

- The production of over 200 affordable rental units.
- The production of 15 single family homes.
- 15 of families received down payment assistance.
- Prioritization of high-opportunity zones for housing production.
- Use of Emerging Business Enterprises for development and construction, while being compliant with federal laws

Long-term effect:

The production of rental developments and single-family home will have a significant impact on increased in tax revenue by placing these homes back in use as well as the surrounding homes that were previously next to a previously foreclosed property.

According to the U.S. Census Bureau, home equity accounted for 27.8 percent of household wealth (2020), however Milwaukee County is losing homeownership\(^1\). From 2010 to 2020, Milwaukee County homeownership decreased by nearly 3%. Disproportionately, Black homeownership decreased 4.4% during that same time. It is expected through affordable single family homes and down payment assistance, that wishful buyers that could not necessarily afford homes, will be incentive to move to homeownership. Thus, families will be able to settle down in their new neighborhood, grow roots, and have improved life expectancy, reduced poverty, improved health, and better educational opportunities.

This proposal focuses on the root cause of health disparities as the lack of housing is directly related to health outcomes. Housing is well understood to be an important social determinant of physical and mental health and well-being. Affordable housing alleviates crowding and makes more household resources available to pay for health care and healthy food, which leads to better health outcomes. High quality housing limits exposure to environmental toxins that impact health. Stable and affordable housing also supports mental health by limiting stressors related to financial burden or frequent moves, or by offering an escape from an abusive home environment. Affordable homeownership can have mental health benefits by offering homeowners control over their environment. Affordable housing can also serve as a platform for providing supportive services to improve the health of vulnerable populations, including the elderly, people with disabilities, and homeless individuals and families. Safe, decent, and affordable housing in neighborhoods of opportunity can also offer health benefits to low- and moderate-income

---

\(^1\) The Wealth of Households: 2020 (census.gov)
households. For example, children from low-opportunity neighborhoods who move to high-opportunity neighborhoods are 32% more likely to attend college and earn an average of $302,000 more over their lifetime².

By providing single-family homes, rental units and down payment assistance families will less likely become homeless. Families, living at low-to moderate income will have the opportunity to reside in higher-opportunity zones, that provide a wealth of resources such as good schools, job opportunities. Results from HUD’s Family Options Study, families that received permanent housing assistance, “had greater housing stability, less psychological distress, less intimate partner violence, better child outcomes, less food insecurity, and less economic stress than their counterparts assigned to a group receiving usual care” (homeless and housing assistance, without priority of one program)³.

Potential Roadblocks.

In any programming, there may be roadblocks; however, given that MCHS has been successfully implementing the current program; we do not anticipate many roadblocks. As stated earlier, the MCHS has a rolling RFP for developers. Those who wish to submit a proposal must detail the readiness of their proposed program. They need to discuss what has been completed in the development process, including land acquisition, construction financing, architectural drawings, zoning, etc. In addition, they need to identify what steps must be completed to begin construction. Project Readiness is the 16% of the scoring criteria on the RFP. This will reduce any roadblock that may arise, given the developers have already begun their processes and have buy-in with the municipalities they are working with.

Reducing housing cost burden for residents without increasing other costs.

With the focus of the grant being the expansion of affordable housing, the housing cost burden would be dramatically reduced on the high opportunity neighborhoods that are going to be targeted. Milwaukee County expects the transportation burden to also decrease as a result of the project. City of Milwaukee low-income residents continue to have a transportation burden to get to job located in the suburbs. A severe lack of affordable housing and mass transit options make it very difficult for residents to get to work.

Model for other communities to scale or replicate the proposal.

The impetus of MCHS’s successful implementation of our current programming, in alignment with the current proposal, is the importance of community and stakeholder engagement. A hurdle that we circumvent is getting buy-in at the front end of our programming as well as having a

---


rolling RPF process for developers as well as Memorandums of Understanding with the municipalities who will be receiving the affordable housing units and homes.

*Environmental risks and alignment to efficiently promote community resilience.*

According to the Milwaukee County Office of Emergency Management Hazard Mitigation Plan 2016-2017, flooding is a significant environment risk. Wisconsin has experienced many floods and has been more than seven Presidential Disaster Declaration requests for flooding. The Milwaukee County Hazard Mitigation Plan is a multi-jurisdictional plan that encompasses all incorporated and unincorporated jurisdictions within the County. All participating jurisdictions in Milwaukee County, including the sixteen Community Development Block Grant (CDBG) Urban County member communities and the two HOME Consortium members, were actively involved in the planning process.

Milwaukee County Office of Emergency Management works with County Planning and Zoning Departments as well as local municipalities to encourage coordination and consistency between comprehensive planning and the hazard mitigation plan and provide instruction on how to incorporate mitigation strategies into their comprehensive plans and other planning mechanisms.

*Success in enabling the production and preservation of affordable housing.*

Given MCHS’ current success in administrating the ARPA funding as discussed earlier, it is expected that continued success in the production and preservation of affordable housing will occur. The goals and objectives of the proposed project are aligned with the problem statement and aligns with Milwaukee County’s overall goals to achieve racial equity and to address disparities in accessing affordable housing.

<table>
<thead>
<tr>
<th>Table: Goals, Objectives and Measurements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal 1</td>
</tr>
<tr>
<td>Obj. 1.1</td>
</tr>
<tr>
<td>Measured by: i) Document Review: Milwaukee County Board approval minutes; Existence of signed agreements with developers, ii) signed MOUs with municipalities receiving the additional housing; iii. Number of permits, iv. Number of actual homes rehabilitated; v. increased property value, vi. increased property taxes</td>
</tr>
<tr>
<td>Obj. 1.2</td>
</tr>
<tr>
<td>Measured by: i) Document Review: Milwaukee County Board approval minutes; Existence of signed agreements with developers, ii) signed MOUs with municipalities receiving the additional housing; iii) the number units created on an annual basis</td>
</tr>
<tr>
<td>Goal 2:</td>
</tr>
<tr>
<td>Obj. 2.1</td>
</tr>
<tr>
<td>Measured by: i) Document Review: Milwaukee County Board approval minutes; Existence of signed agreements with community agencies implementing the program,</td>
</tr>
</tbody>
</table>
Milwaukee County Housing Services
PRO Housing Application

| i) the number of families receiving interest rate assistance, ii) the number of families receiving down payment assistance, iii) the amount of down payment per family |

*Long-term effect of your proposal on removing barriers to affordable housing production.*

Milwaukee County is experiencing an affordable housing crisis, and the increasing housing instability is taking a toll on individual health outcomes in different communities throughout the county. Milwaukee County’s vision is to achieve health and race equity by moving resources upstream to address critical social determinants of health. Housing stability is critical to that vision as it impacts dozens of quality-of-life measures including employment, early childhood development, stress levels, education, and health. MCHS has been very successful in providing services for crisis housing and homeless outreach; this funding opportunity allows us to focus on upstream activities that improve housing security and preventing housing crisis.

Currently, in Milwaukee County, it is too expensive to rent or buy homes for low-to moderate families. Monthly rental costs for a two-bedroom apartment in the Milwaukee-Waukesha area rose 18% from 2020 ($967/month) to 2023 ($1,143) in the same period. According to Redfin, in June 2023, Milwaukee County home prices were up 6.4% compared to last year, selling for a median price of $250K. In addition, to increase monthly home expenses, there is a lack of rental units that are accessible to the those with a disability. As the population of Milwaukee County ages and the number of children and adults with a disability increases there is a need for accessible housing.

This proposed program, will reduce those barriers by producing affordable housing and rental units in well-resourced neighborhoods. By increasing affordable housing and down payment assistance, families will have the opportunity to create generation wealth. Families will spend less money on rent and more of an opportunity to save. Families will have improved housing outcomes, increase health and mental health outcomes.

---

4 Apartment List Blog - Data & Rent Estimates
5 Milwaukee County, WI Housing Market: House Prices & Trends | Redfin
Grant Application Detailed Budget Worksheet

**Applicant Name:** Milwaukee County Housing Services  
**Applicant Address:** 600 W. Walnut Street, Suite 100  
Milwaukee, Wisconsin 53212

<table>
<thead>
<tr>
<th>Category</th>
<th>Detailed Description of Budget (for full grant period)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Personnel (Direct Labor)</strong></td>
<td>Estimated Hours</td>
</tr>
<tr>
<td>Housing Administrator</td>
<td>624</td>
</tr>
<tr>
<td>Senior Project Manager</td>
<td>1,300</td>
</tr>
<tr>
<td>Housing Inspector</td>
<td>1,300</td>
</tr>
<tr>
<td>Lead Community Intervention Specialist</td>
<td>1,248</td>
</tr>
<tr>
<td>Senior Budget and Management Analyst</td>
<td>1,300</td>
</tr>
</tbody>
</table>

**Total Direct Labor Cost:** $318,533

<table>
<thead>
<tr>
<th><strong>2. Fringe Benefits</strong></th>
<th>Rate (%)</th>
<th>Base</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Funds</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other Federal Share</th>
<th>Other Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Administrator</td>
<td>40.68%</td>
<td>$40,279</td>
<td>$16,385</td>
<td>$16,385</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Senior Project Manager</td>
<td>40.68%</td>
<td>$50,973</td>
<td>$20,736</td>
<td>$20,736</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Lead Community Intervention Specialist</td>
<td>40.68%</td>
<td>$48,934</td>
<td>$19,906</td>
<td>$19,906</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Senior Budget and Management Analyst</td>
<td>40.68%</td>
<td>$53,040</td>
<td>$21,577</td>
<td>$21,577</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Housing Inspector</td>
<td>40.68%</td>
<td>$37,167</td>
<td>$15,120</td>
<td>$15,120</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

**Total Fringe Benefits Cost:** $129,580

Previous versions of HUD-424-CBW are obsolete.
### 3. Travel

#### 3a. Transportation - Local Private Vehicle

<table>
<thead>
<tr>
<th>Mileage</th>
<th>Rate per Mile</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>12000</td>
<td>$0.655</td>
<td>$7,860</td>
<td>$7,860</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Local Travel - for progress inspections, site visits.

Subtotal - Trans - Local Private Vehicle: $7,860

#### 3b. Transportation - Airfare (show destination)

<table>
<thead>
<tr>
<th>Trips</th>
<th>Fare</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Subtotal - Transportation - Airfare

#### 3c. Transportation - Other

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Subtotal - Transportation - Other

#### 3d. Per Diem or Subsistence (indicate location)

<table>
<thead>
<tr>
<th>Days</th>
<th>Rate per Day</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Subtotal - Per Diem or Subsistence

**Total Travel Cost**

### 4. Equipment (Only items over $5,000 Depreciated value)

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Total Equipment Cost**
5. Supplies and Materials (Items under $5,000 Depreciated Value)

### 5a. Consumable Supplies

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Consumable Supplies

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Non-Consumable Materials

### 5b. Non-Consumable Materials

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Non-Consumable Materials

Total Supplies and Materials Cost

### 6. Consultants (Type)

<table>
<thead>
<tr>
<th>Days</th>
<th>Rate per Day</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total Consultants Cost

### 7. Contracts and Sub-Grantees (List individually)

#### 7a. Contracts

- **TBD - Through RFP process, developer will be identified to provide Affordable Multi-Family Rental Developments.**
  - 4 days: $1,750,000.00, $7,000,000, $7,000,000, $0, $0, $0, $0, $0, $0
- **TBD - Through RFP process, community agency will be identified to provide Down Payment Assistance services**
  - 15 days: $33,000.00, $495,000, $495,000, $0, $0, $0, $0, $0, $0
- **TBD - Through RFP process, developer will be identified to produce single family homes**
  - 15 days: $133,000.00, $1,995,000, $1,995,000, $0, $0, $0, $0, $0, $0

Subtotal - Contracts: $9,490,000, $9,490,000, $0, $0, $0, $0, $0, $0, $0

#### 7b. Sub-Grantees (List individually)

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

TBD - Through RFP process, developer will be identified to provide Affordable Multi-Family Rental Developments.

TBD - Through RFP process, community agency will be identified to provide Down Payment Assistance services.

TBD - Through RFP process, developer will be identified to produce single family homes.

Previous versions of HUD-424-CBW are obsolete.
<table>
<thead>
<tr>
<th>Subtotal - Sub-Grantees</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Contracts and Sub-Grantees Cost</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Construction Costs

#### 8a. Administrative and legal expenses

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Administrative and legal expenses

#### 8b. Land, structures, rights-of way, appraisal, etc

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Land, structures, rights-of way, ... 

#### 8c. Relocation expenses and payments

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Relocation expenses and payments

#### 8d. Architectural and engineering fees

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Architectural and engineering fees

#### 8e. Other architectural and engineering fees

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Other architectural and engineering fees

#### 8f. Project inspection fees

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subtotal - Project inspection fees

---

Previous versions of HUD-424-CBW are obsolete.
<p>| | | | | | | | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal - Site work</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal - Demolition and removal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal - Construction</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal - Equipment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal - Contingencies</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal - Miscellaneous</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Construction Costs</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## 9. Other Direct Costs

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Estimated Cost</th>
<th>Applicant Match</th>
<th>HUD Share</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>Item</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th>Applicant Match</th>
<th>HUD Share</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
</table>

Total Other Direct Costs

Subtotal of Direct Costs

| Total Other Direct Costs | $9,945,973 | $9,937,861 | $0 | $0 | $0 | $0 | $0 | $0 | $0 | $0 |

## 10. Indirect Costs

<table>
<thead>
<tr>
<th>Type</th>
<th>Rate</th>
<th>Base</th>
<th>Estimated Cost</th>
<th>HUD Share</th>
<th>Applicant Match</th>
<th>Other HUD Funds</th>
<th>Other Federal Share</th>
<th>State Share</th>
<th>Local/Tribal Share</th>
<th>Other</th>
<th>Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.10</td>
<td>$455,973</td>
<td>$45,597</td>
<td>$44,786</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Total Indirect Costs

| Total Indirect Costs | $45,597 |

Total Estimated Costs

| Total Estimated Costs | $9,991,570 |
# Grant Application Detailed Budget Worksheet

Expiration: 1/31/2026

## Detailed Description of Budget

<table>
<thead>
<tr>
<th>Analysis of Total Estimated Costs</th>
<th>Estimated Cost</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Personnel (Direct Labor)</td>
<td>318,533.00</td>
<td>3.20%</td>
</tr>
<tr>
<td>2 Fringe Benefits</td>
<td>129,580.00</td>
<td>1.30%</td>
</tr>
<tr>
<td>3 Travel</td>
<td>7,860.00</td>
<td>0.0%</td>
</tr>
<tr>
<td>4 Equipment</td>
<td>0.00</td>
<td>0.0%</td>
</tr>
<tr>
<td>5 Supplies and Materials</td>
<td>0.00</td>
<td>0.0%</td>
</tr>
<tr>
<td>6 Consultants</td>
<td>0.00</td>
<td>0.0%</td>
</tr>
<tr>
<td>7 Contracts and Sub-Grantees</td>
<td>9,490,000.00</td>
<td>95.0%</td>
</tr>
<tr>
<td>8 Construction</td>
<td>0.00</td>
<td>0.0%</td>
</tr>
<tr>
<td>9 Other Direct Costs</td>
<td>0.00</td>
<td>0.0%</td>
</tr>
<tr>
<td>10 Indirect Costs</td>
<td>45,597.00</td>
<td>0.50%</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.0%</strong></td>
</tr>
<tr>
<td><strong>Federal Share:</strong></td>
<td><strong>9,991,570.00</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>

### Match

(Expressed as a percentage of the Federal Share):

<table>
<thead>
<tr>
<th>Estimated Cost</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00</td>
<td>0</td>
</tr>
</tbody>
</table>
Other Submission Requirements

- Standard Form 424 (SF-424)
- Assurances (HUD 424-B)
- Applicant Disclosure Report Form 2880 (HUD 2880)
- Certification Regarding Lobbying
- Disclosure of Lobbying Activities (SF-LLL)
- PRO Housing Certifications
- Letter of Commitment of Leveraged Funds
- Code of Conduct
Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

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

*Authorized Representative Name:

Prefix: 
Middle Name: J
*Last Name: Fries
Suffix: 
*Title: Senior Grant Analyst
*Applicant Organization: Milwaukee County

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-6102) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion (including gender identity and sexual orientation), disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§5.105(a) and 5.106 as applicable.

6. 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) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

7. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

8. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHIs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHIs established under State law are not excluded from the statute's coverage.
I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3730).

*Signature: Completed Upon Submission to Grants.gov  *Date: Completed Upon Submission to Grants.gov
Applicant/Recipient
Disclosure/Update Report

Applicant/Recipient Information * UEI Number: XJHPH214C6Q3 * Report Type: INITIAL

1. Applicant/Recipient Name, Address, and Phone (include area code):
   * Applicant Name: Milwaukee County
   * Street1: 600 W. Walnut Street
   * City: Milwaukee
   * County: Milwaukee
   * State: WI: Wisconsin
   * Zip Code: 53212-3869
   * Phone: 414-278-5250

2. Employer ID Number (do not include individual social security numbers): 39-6005720

* 3. HUD Program Name:
   Community Development Block Grant - PRO Housing Competition

* 4. Amount of HUD Assistance Requested/Received: $ 9,991,570.00

5. State the name and location (street address, City and State) of the project or activity:
   * Project Name: Milwaukee County PRO Housing Program
   * Street1: 600 W. Walnut Street
   * City: Milwaukee
   * County: Wisconsin
   * State: WI: Wisconsin
   * Zip Code: 53212-3863
   * Country: USA: UNITED STATES

Part I Threshold Determinations

* 1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. For further information see 24 CFR Sec. 4.3.
   □ Yes   □ No

* 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of $200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR 4.9.
   □ Yes   X No

If you answered "No" to either question 1 or 2, Stop! You do not need to complete the remainder of this form. However, you must sign the certification at the end of the report.
Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.
Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name:

* Government Agency Name: 

Government Agency Address:

* Street1: 
Street2: 
* City: 
County: 
* State: 
* Zip Code: 
* Country: 

* Type of Assistance: 
* Amount Requested/Provided: $ 

* Expected Uses of the Funds:

Department/State/Local Agency Name:

* Government Agency Name: 

Government Agency Address:

* Street1: 
Street2: 
* City: 
County: 
* State: 
* Zip Code: 
* Country: 

* Type of Assistance: 
* Amount Requested/Provided: $ 

* Expected Uses of the Funds:

Note: Use additional pages if necessary.
Part III Interested Parties. You must disclose:

1. All developers, contractors, or consultants involved in the application for assistance or in the planning, development, or implementation of the project or activity.

<table>
<thead>
<tr>
<th>* Alphabetical list of all persons with a reportable financial interest in the project or activity (for individuals, give the last name first)</th>
<th>* Unique Entity ID</th>
<th>* Type of Participation in Project/Activity</th>
<th>* Financial Interest in Project/Activity ($ and %)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
</tbody>
</table>

2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds $50,000 or 10 percent of the assistance (whichever is lower).

<table>
<thead>
<tr>
<th>* Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)</th>
<th>City of Residence</th>
<th>* Type of Participation in Project/Activity</th>
<th>* Financial Interest in Project/Activity ($ and %)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$</td>
</tr>
</tbody>
</table>

Note: Use additional pages if necessary.

Certification

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, correct, and accurate.

Warning: If you knowingly make a false statement on this form, you may be subject to criminal and/or civil penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed $10,000 for each violation.

* Signature: 
Completed Upon Submission to Grants.gov

* Date: (mm/dd/yyyy)
Completed Upon Submission to Grants.gov
Instructions

Overview.

A. Coverage. You must complete this report if:

1. You are applying for assistance from HUD for a specific project or activity and you have received, or expect to receive, assistance from HUD in excess of $200,000 during the fiscal year;
2. You are updating a prior report as discussed below; or
3. You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.

B. Update reports (filed by “Recipients” of HUD Assistance):

General. All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

Line-by-Line Instructions.

Applicant/Recipient Information.

All applicants for HUD competitive assistance, must complete the information required in blocks 1-5 of form HUD-2880:

1. Enter the full name, address, city, State, zip code, and telephone number (including area code) of the applicant/recipient. Where the applicant/recipient is an individual, the last name, first name, and middle initial must be entered.
2. Entry of the applicant/recipient's EIN, as appropriate, is optional. Individuals must not include social security numbers on this form.
3. Applicants enter the HUD program name under which the assistance is being requested.
4. Applicants enter the amount of HUD assistance that is being requested. Applicants enter the amount of HUD assistance that has been provided and to which the update report relates. The amounts are those stated in the application or award documentation. NOTE: In the case of assistance that is provided pursuant to contract over a period of time such as project-based assistance under section 8 of the United States Housing Act of 1937, the amount of assistance to be reported includes all amounts that are to be provided over the term of the contract, irrespective of when they are to be received.
5. Applicants enter the name and full address of the project or activity for which the HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

Part I. Threshold Determinations - Applicants Only

Part I contains information to help the applicant determine whether the remainder of the form must be completed. Recipients filing Update Reports should not complete this Part.

If the answer to either questions 1 or 2 is No, the applicant need not complete Parts II and III of the report but must sign the certification at the end of the form.

Part II. Other Government Assistance and Expected Sources and Uses of Funds.

A. Other Government Assistance. This Part is to be completed by both applicants and recipients for assistance and recipients filing update reports. Applicants and recipients must report any other government assistance involved in the project or activity for which assistance is sought. Applicants and recipients must report any other government assistance involved in the project or activity. Other government assistance is defined in note 4 on the last page. For purposes of this definition, other government assistance is expected to be made available if, based on an assessment of all the circumstances involved, there are reasonable grounds to anticipate that the assistance will be forthcoming.

Both applicant and recipient disclosures must include all other government assistance involved with the HUD assistance, as well as any other government assistance that was made available before the request, but that has continuing vitality at the time of the request. Examples of this latter category include tax credits that provide for a number of years of tax benefits, and grant assistance that continues to benefit the project at the time of the assistance request.

The following information must be provided:
1. Enter the name and address, city, State, and zip code of the government agency making the assistance available.
2. Enter the amount of other government assistance (e.g., loan, grant, loan insurance).
3. Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
4. Uses of funds. Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.

B. Non-Government Assistance. Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds - both from HUD and any other source - that have been or are to be, made available for the project or activity. Non-government sources of Form HUD-2880 funds typically include (but are not limited to) foundations and private contributors.

Part III. Interested Parties.

This Part is to be completed by both applicants and recipients filing update reports. Applicants must provide information:

1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity
2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds $50,000 or 10 percent of the assistance (whichever is lower). Note: A financial interest means any financial involvement in the project or activity, including (but not limited to) situations in which an individual or entity has an equity interest in the project or activity, shares in any profit on resale or any distribution of surplus cash or other assets of the project or activity, or receives compensation for any goods or services provided in connection with the project or activity. Residency of an individual in housing for which assistance is being sought is not, by itself, considered a covered financial interest.

The information required below must be provided.
1. Enter the full names and addresses. If the person is an entity, the listing must include the full name and address of the entity as well as the CEO. Please list all names alphabetically.
2. Entry of the Unique Entity Identifier (UEI), for non-individuals, or city of residence, for individuals, for each organization and person listed is optional.
3. Enter the type of participation in the project or activity for each person listed: i.e., the person's specific role in the project (e.g., contractor, consultant, planner, investor).
4. Enter the financial interest in the project or activity for each person listed. The interest must be expressed both as a dollar amount and as a percentage of the amount of the HUD assistance involved.

Note that if any of the source/use information required by this report has been provided elsewhere in this application package, the applicant need not repeat the information, but need only refer to the form and location to incorporate it into this report. (It is likely that some of the information required by this report has been provided on SF 424A, or on various budget forms accompanying the application.) If this report requires information beyond that provided elsewhere in the application package, the applicant must include in this report all the additional

Form HUD-2880 (02/23)
information required. Recipients must submit an update report for any change in previously disclosed sources and uses of funds as provided in Section I.D.5., above.

Notes:
1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
2. Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).
3. See 24 CFR §4.9 for detailed guidance on how the threshold is calculated.
4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.
5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.
CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an 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, the undersigned shall complete and submit Standard Form-LLL, “Disclosure of Lobbying Activities,” in accordance with its instructions.

(3) The undersigned shall require that the language of this 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. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any 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 commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, “Disclosure of Lobbying Activities,” in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

* APPLICANT’S ORGANIZATION
Milwaukee County

* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE
Prefix:  * First Name: Carla
Middle Name:  
* Last Name: Fries
Suffix:  
* Title: Senior Grant Analyst

* SIGNATURE: Completed on submission to Grants.gov  * DATE: Completed on submission to Grants.gov
# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

**OMB Number:** 4040-0013  
**Expiration Date:** 02/28/2025

## 1. * Type of Federal Action:*
- a. contract
- b. grant
- c. cooperative agreement
- d. loan
- e. loan guarantee
- f. loan/insurance

## 2. * Status of Federal Action:*
- a. bid/offer/application
- b. initial award
- c. post-award

## 3. * Report Type:*
- a. initial filing
- b. material change

## 4. Name and Address of Reporting Entity:

<table>
<thead>
<tr>
<th>Prime</th>
<th>Sub/Non-Awardee</th>
</tr>
</thead>
</table>

**Name:** James Mathy  

**Street 1:** 400 W. Walnut Street  

**City:** Milwaukee  

**State:** WI: Wisconsin  

**Zip:** 53212  

**Congressional District, if known:**

5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:

## 6. * Federal Department/Agency:*

- Housing and Urban Development

## 7. * Federal Program Name/Description:*

- Community Development Block Grant- PRO Housing Competition  

**CFDA Number, if applicable:** 14.223

## 8. Federal Action Number, if known:

- $<null>

## 9. Award Amount, if known:

## 10. a. Name and Address of Lobbying Registrant:

<table>
<thead>
<tr>
<th>Prefix</th>
<th>*First Name</th>
<th>Last Name</th>
<th>Middle Name</th>
<th>Suffix</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr.</td>
<td>Alec</td>
<td>Knudson</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Street 1:** 901 N 9th Street  

**City:** Milwaukee  

**State:** WI: Wisconsin  

**Zip:** 53233

## 11. b. Individual Performing Services (including address if different from No. 10a):

<table>
<thead>
<tr>
<th>Prefix</th>
<th>*First Name</th>
<th>Last Name</th>
<th>Middle Name</th>
<th>Suffix</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Diane</td>
<td>Isomnia</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Street 1:** 400 W. Walnut Street  

**City:** Milwaukee  

**State:** WI: Wisconsin  

**Zip:** 53212

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

## Signature:

*Completed on submission to Grants.gov*

**Name:**  

<table>
<thead>
<tr>
<th>Prefix</th>
<th>*First Name</th>
<th>Last Name</th>
<th>Middle Name</th>
<th>Suffix</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Carla</td>
<td>Fries</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Title:** Senior Grant Analyst  

**Telephone No.:** 414-309-9002  

**Date:** Completed on submission to Grants.gov

## Federal Use Only:

Authorized for Local Reproduction  
Standard Form - LLL (Rev. 7-97)
Appendix B -- Certifications

Applicants to the PRO Housing program must use this Appendix to certify their compliance with various requirements. Applicants should complete the certifications relevant to them and submit them with their application. Please note that all applicants must complete the lobbying certification.

PRO HOUSING CERTIFICATIONS FOR ENTITLEMENT LOCAL GOVERNMENT APPLICANTS

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

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

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 has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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.
Milwaukee County
PRO Housing

**Authority of Jurisdiction** -- The submission of the PRO Housing application 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.

**Consistency with plan** -- The housing activities to be undertaken with PRO Housing funds are consistent with the strategic plan in the jurisdiction’s consolidated plan.

**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.

**Build America, Buy America (BABA)** -- It will comply with Title IX, Subpart A of the Infrastructure Investment and Jobs Act of 2021 (41 U.S.C. 8301 et seq.).

**Public Participation** -- It is in full compliance with the PRO Housing streamlined public participation requirements found in Section VI.E of the PRO Housing NOFO.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with PRO Housing funds, it has developed its proposal so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The proposal may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional PRO Housing Certification).

2. **Overall Benefit.** The aggregate use of PRO Housing funds shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with PRO Housing funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.
Milwaukee County
PRO Housing

However, if PRO Housing funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with PRO Housing funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than PRO Housing funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than PRO Housing funds if the jurisdiction certifies that it lacks PRO Housing funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K and R; and EPA’s lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

**Compliance with RFRA** -- The grant will be conducted and administered in conformity with the requirements of the Religious Freedom Restoration Act (42 U.S.C. 2000bb) and 24 CFR 5.109, allowing the full and fair participation of faith-based entities.

**Environmental Review** -- It will comply with environmental review procedures and requirements at 24 CFR parts 50 and 58.

**Compliance with Laws** -- It will comply with applicable laws.

_________________________________  10/5/2023
Signature of Authorized Official  Date

Milwaukee County Executive

Title
Chapter 9 CODE OF ETHICS

9.01. Declaration of policy and ethics principles.

(1) Policy. It is declared that high moral and ethical standards among county public officials and county employees are essential to the conduct of free government; that the county believes that a code of ethics for the guidance of county public officials and county employees will help them avoid conflicts between their personal interests and their public responsibilities, will improve standards of public service and will promote and strengthen the faith and confidence of the people of this county in their county public officials and county employees. It is the intent of the county that in its operations the board shall protect to the fullest extent possible the rights of individuals affected.

(2) Ethics principles. The proper operation of democratic government requires that public officials and employees be independent, impartial, and responsible to the people; that decisions and policy be made in the best interests of the people, the community, and the government; that public office not be used for personal gain; and that the public has confidence in the integrity of its government. In recognition of these goals, this code of ethics shall apply to all candidates for county office, elected and appointed officers and employees of the county, and members of county boards and commissions. Nothing contained herein is intended to deny to any individual those rights granted by the United States Constitution, the constitution and laws of the State of Wisconsin, or labor agreements negotiated with certified employee bargaining representatives. The purpose of this code is to establish standards of conduct to assist public officials and employees in avoiding those acts or actions that are incompatible with the best interests of county government and the people of Milwaukee County. Further this code provides the process by which determinations are made that public officials or employees have acted in ways which are incompatible with the best interests of county government and of the people of Milwaukee County.

(a) Ethical principles. The ethical county public official or employee should:

* Properly administer the affairs of the county.
* Promote decisions that only benefit the public interest.
* Actively promote public confidence in county government.
* Preserve and protect all funds and other properties of the county.
* Conduct and perform the duties of the office diligently and promptly dispose of the business of the county.
* Maintain a positive image to pass constant public scrutiny.
* Evaluate all decisions so that the best service or product is obtained at a minimal cost without sacrificing quality and fiscal responsibility.
* Inject the prestige of the office into everyday dealings with the public, employees and associates.
* Maintain a respectful attitude toward employees, other public officials, colleagues and associates.
* Effectively and efficiently work with governmental agencies, political subdivisions and other organizations in order to further the interest of the county.
* Faithfully comply with all laws and regulations applicable to the county and impartially apply them to everyone.

(b) The ethical county public official or employee should not:

* Engage in outside interests that are not compatible with the impartial and objective performance of his or her duties.

* Improperly influence or attempt to influence other officials to act in his or her own benefit.

* Accept anything of value from any source that is offered to influence his or her action as a public official.

* Improperly use county resources outside of his or her county duties to solicit or provide support for or against an elected county official or an elected county official's appointment.

(c) The ethical county public official or employee accepts the responsibility that his or her mission is that of servant and steward to the public.

9.02. Definitions.

(1) "Anything of value" means any money or property, favor, service, payment, advance, forbearance, loan, or promise of future employment, business, or other consideration having a value greater than fifty dollars ($50.00), but does not include compensation and expenses paid by the county, fees and expenses which are permitted and reported under section 9.14 of the Code, political contributions which are reported under ch. 11, Wis. Stats., or hospitality extended for a purpose unrelated to county business by a person other than an organization.

(1m) "Appointed official" means any member appointed to a county commission or board.

(2) "Associated," when used with reference to an organization, includes any organization in which an individual or a member of his/her immediate family is a director, officer, or trustee, or who has a significant fiduciary relationship or an individual who owns or controls, directly or indirectly, and severally or in the aggregate, at least ten (10) percent of the outstanding equity.

(3) "Board" means the ethics board.

(4) "Business" means any corporation, partnership, proprietorship, firm, enterprise, franchise, association, organization, self-employed individual, or any other legal entity that engages in profit-making activities.

(5) "Conflict of interest" means a public official's or employee's action or failure to act in the discharge of his or her official duties which could reasonably be expected to produce or assist in producing a substantial economic or personal benefit for such official, his or her immediate family or an organization with which he or she is associated.

(6) "Elected official" means any person holding an elected county office.

(6m) "Elected official's appointment" means any person who is appointed by an elected official and who requires county board confirmation.

(7) "Employee" means any person holding an office or position in the classified service of the county or any person holding a non-classified office or position, except elected officials and appointed officials.

(8) "Gift" means the payment or receipt of anything of value without valuable and sufficient consideration.

(9) "Immediate family" means an individual's:

(a) Spouse; and
(b) Child, parent or sibling or in-law or step-relative of the same degree who receives, directly or indirectly, more than one-half (½) of his/her support from the individual or from whom the individual receives, directly or indirectly, more than one-half (½) of his/her support.

10. "Investigation request" means a written and signed statement from a person stating that there are specific acts or omissions by an identified person subject to the Code from unverified sources which appear prima facie to constitute a violation of the Code and for which the requestor is seeking that an investigation be undertaken to determine whether a matter should be pursued under the verified complaint proceedings. The investigation request must remain confidential until disclosure is permitted or required by the Code unless the subject of the complaint requests in writing that it be made part of the public record.

11. "Lobbying" means the practice of attempting to influence legislative or administrative action by oral or written communication with any public official.

12. "Ministerial action" means an action that an individual performs in a given state of facts in a prescribed manner in obedience to the mandate of legal authority, without regard to the exercise of the individual's own judgment as to the propriety of the action being taken.

13. "Organization" means any stock or non-stock corporation, partnership, proprietorship, firm, enterprise, franchise, incorporated or unincorporated association, trust or other legal entity other than an individual or body politic.

14. "Privileged information" means information obtained under government authority which has not become a part of the body of public information.

15. "Probable cause" means information sufficient to support a reasonable belief that an identified person has or may have violated one (1) or more provisions of this Code.

16. "Public official" means any elected official or appointed official.

17. "Reporting period" means any six-month period beginning with Jan. 1 and ending with June 30 or beginning with July 1 and ending with Dec. 31 or annual period beginning January 1 through December 31.

18. "Significant fiduciary relationship" means owning or controlling, directly or indirectly:
   (a) At least ten (10) percent of the outstanding stock or stock of any business corporation having a cost or market values of at least five thousand dollars ($5,000.00), or
   (b) An interest of at least ten (10) percent or five thousand dollars ($5,000.00) of any organization.

19. "Resources" means county supplies, services, property, or facilities not available to all citizens.

20. "Solicit" means to seek or plead, to entreat and ask.

21. "Verified complaint" means a written statement from a person, given under oath and subscribed before a notary public or other official authorized to administer oaths, alleging specific acts or omissions constituting a violation of the Code by an identified person subject to the Code. The verified complaint must remain confidential until disclosure is permitted or required by the Code unless the subject of the complaint requests in writing that it be made part of the public record.

9.03. Financial disclosure.

1. County officials, candidates or employees required to file statements of economic interest: All county elected and appointed officials, candidates for elected county offices, and county employees, whose duties and responsibilities, performed for or on behalf of the county or any board or commission thereof, include the awarding or execution of contracts for the purchase of supplies, services, materials, and/or equipment; the construction of public works; and/or the sale or leasing of real estate or who may be designated by the ethics board, shall file statements of economic interests as set forth in this section. In the case of members of
boards and commissions, the ethics board may, in its discretion, require the filing of economic interest statements by members of boards and commissions. Upon failure of any such person to file the requested statement within a period of thirty (30) days from the date requested in writing by the ethics board, such person shall be subject to those penalties applicable to others who fail to file such statements as required by this chapter.

(2) *Filed with county election commission:* Statements of economic interests shall be filed with the county election commission on the Friday following the date of the filing of nomination papers:

(a) By all county elected officials when initially a candidate for office; and

(b) By all candidates for county elected offices.

The election commission shall provide the ethics board with a copy of all filings under this paragraph by county elected officials who have filed to be a candidate for office.

(3) *File within thirty (30) days of employment or taking office:* Upon entering county employment, elected office, or appointment as a public official, persons required to file statements of economic interests shall do so within thirty (30) days after commencement of employment or of taking oath of office.

(4) *Annual statement of economic interest filing requirement:*

(a) [Requirements.] Each person required to file a statement of economic interests shall file updated statements with the ethics board within thirty (30) days after the closing of each calendar year. A filing made by a county elected official under section 9.03(2) shall fulfill that year’s annual filing requirement.

(b) *No compensation until filing:* A person required to file a statement of economic interests under this section shall not receive his/her salary or other compensation until he/she files such statement of economic interests.

(c) *Disclosure by spouse:* County elected officials, appointed officials, candidates, and employees required to file statements of economic interests, as required by section 9.03, shall include and file statements of a spouse’s employment and financial assets and liabilities.

(5) *Updating recommended list of individuals covered:* Each department head in the service of the county shall submit to the executive director of the ethics board an updated list of the job titles and position numbers of those incumbents within his/her jurisdiction. He/she shall indicate on the list whom, in his/her opinion, should be required to file statements of economic interests and sworn affidavits.

9.04. Form of statement.

(1) The person filing a statement of economic interests, as required under this chapter, shall file the statement on a form prescribed by the ethics board, with the concurrence of corporation counsel and the office of the comptroller, and shall include the following information applicable as of the 15th day of the month preceding the month in which the statement is required to be filed:

(a) The identity of every significant fiduciary relationship, organization associated with and the offices and directorships held by him/her or his/her spouse;

(b) The identity and amount of bonds, debentures, or debt obligations of a municipal corporation or other corporation, in excess of five thousand dollars ($5,000.00), held by him/her or his/her spouse;

(c) The name of any creditor to whom he/she or his/her spouse owes five thousand dollars ($5,000.00) or more and the amount owed;

(d) The identity of each significant fiduciary relationship and the identity and amount of property, bonds, debentures, or debt obligations of a municipal corporation or other corporation in excess of five
thousand dollars ($5,000.00) transferred by him/her or his/her spouse to a member of his/her immediate family during the two (2) calendar years preceding the filing of the statement;

(e) The identity of real property in the county or contiguous county in which the person or his/her spouse holds an interest and the nature of the interest held. Real property exempted from reporting includes:

1. The principal residence of such person or his/her spouse; and
2. Real property for which the pro rata share of such person or his/her spouse is less than ten (10) percent of the outstanding shares or is less than an equity value of five thousand dollars ($5,000.00).

(f) The identity of each non-stock corporation:

1. Which such person or his/her spouse holds an office or position and the title of the office or position; and
2. Which is doing business with the county or operating in the county.

(2) The person filing a statement of economic interests, as required under this chapter, shall complete a declaration item at the end of the form affirming their understanding and compliance with the provisions of this chapter.

9.05. Standards of conduct.

(1) No personal or economic interest in decisions and policies: The county board hereby reaffirms that a county elected official, appointed official or employee holds his/her position as a public trust, and any effort to realize personal gain through official conduct is a violation of that trust. This chapter shall not prevent any county elected official, appointed official or employee from accepting other employment or from following any pursuit which does not interfere with the full and faithful discharge of his/her duties to the county. The county board further recognizes that in a representative democracy, the representatives are drawn from society and, therefore, cannot and should not be without all personal and economic interest in the decisions and policies of government; that citizens who serve as public officials or public employees retain their rights as citizens to interests of a personal or economic nature; that standards of ethical conduct for public employees and public elected and appointed officials need to distinguish between those minor and inconsequential conflicts which are unavoidable in a free society and those conflicts which are substantial and material; and that county elected officials, appointed officials or employees may need to engage in employment and/or professional or business activities, other than official duties, in order to support their families and to maintain a continuity of professional or business activity or may need to maintain investments. However, the code maintains that such activities or investments must not conflict with the specific provisions of this chapter.

(2) (a) No financial gain or anything of substantial value: Except as otherwise provided or approved by the county board, no county public official or employee shall use his/her public position or office to obtain financial gain or anything of substantial value for the private benefit of himself/herself or his/her immediate family, or for an organization with which he/she is associated. This paragraph does not prohibit a county elected official from using the title or prestige of his/her office to obtain campaign contributions that are permitted by and reported as required by ch. 11, Wis. Stats.

(b) No person may offer anything of value: No person shall offer or give to any public official or employee, directly or indirectly, and no public official or employee shall solicit or accept from any person, directly or indirectly, anything of value if it could reasonably be expected to influence the public official’s or employee’s vote, official actions or judgment, or could reasonably be considered as a reward for any official action or inaction or omission by of the public official or employee. This section does not prohibit a public official or an employee from engaging in outside employment.
(c) **No substantial interest or benefit:** Except as otherwise provided in paragraph (1.), no public official or employee shall:

1. Take any official action substantially affecting a matter in which the public official, employee, a member of his/her immediate family, or an organization with which the public official or employee is associated has a substantial financial interest.

2. Use his/her office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the public official, employee, members of the public official’s or employee’s immediate family either separately or together, or an organization with which the public official or employee is associated.

(d) **No disclosure of privileged information:** No county public official or employee shall use or disclose privileged information gained in the course of, or by reason of, his/her position or activities which in any way could result in financial gain for himself/herself or for any other person.

(e) **No use of public position to influence or gain unlawful benefits, advantages or privileges:** No county public official or employee shall use or attempt to use his/her public position to influence or gain unlawful benefits, advantages, or privileges for himself/herself or others.

(f) **No offer of gifts or anything of value:** No county public official shall offer or give anything of value to a member or employee of a county department or entity, while that member or employee is associated with the county department or entity, and no member or employee of a department shall solicit or accept from any such person anything of value from a county official or employee.

(g) **Limits on contracts with county:** No county public official or employee and no business with which he/she or his/her spouse has a significant fiduciary relationship or any organization with which he/she or his/her spouse is associated shall enter into any contract with the county unless that contract has been awarded through a process of public notice and competitive bidding in conformity with applicable federal and state statutes and county ordinances.

(h) **Limits on lease of real estate with county:** No county public official or employee and no business in which that county public official or employee has a ten (10) percent or greater interest shall enter into a lease of real property with the county, except that the county board, upon a publicly filed and considered request, shall waive this subsection when it is in the best interests of the county.

(i) **No limits on lawful payments:** Paragraph (c) does not prohibit an elected official from taking any action concerning lawful payment of salaries or employee benefits or reimbursement of actual and necessary expenses, or prohibit an elected official from taking official action with respect to any proposal to modify a county ordinance.

(j) **No solicitation of at-will employees:** No elected county official shall knowingly solicit a campaign contribution from any "at-will employee" defined as an employee who is not under union or labor contract with the county, who is hired for an indefinite term or who is under an independent contract with the county or its subparts or who can be discharged or terminated at any time for any nondiscriminatory reason.

(k) **No solicitation of county contractors:** No elected county official, or appointee of an elected county official, shall knowingly solicit support or anything of value from a contractor to influence the outcome of an elected county official's appointment.

(l) **No campaign contributions to county officials with approval authority:** No person(s) with a personal financial interest in the approval or denial of a contract or proposal being considered by a county department or with an agency funded and regulated by a county department, shall make a campaign contribution to any county elected official who has approval authority over that contract or proposal during its consideration. Contract or proposal consideration shall begin when a contract or proposal is
submitted directly to a county department or to an agency funded or regulated by a county department until the contract or proposal has reached final disposition, including adoption, county executive action, proceedings on veto (if necessary) or departmental approval. This provision does not apply to those items covered by section 9.14 unless an acceptance by an elected official would conflict with this section. The language in subsection 9.05(2)(k) shall be included in all Requests for Proposals and bid documents.

(m) **Limits on honorarium fees or expense reimbursements:** No county public official or employee shall accept or solicit any honorariums, fees or expense reimbursements except in accordance with section 9.14.

(3) **Limits on contact:**

(a) **Limits on contact with former county associates:** No former county public official or employee, for twelve (12) months following the date on which he/she ceases to be a county public official or employee, shall, for compensation, on behalf of any person other than a governmental entity, provide any contractual services to the county. Nor shall the former county public official or employee make any formal or informal appearance before or try to settle or arrange a matter by calling, writing, or conferring with, any county public official, officer or employee of the department with which he/she was associated as a county public official or employee. The county board committee on finance may waive the contractual services prohibition provision of this section, first effective for county public officials or employees that separate service after April 1, 2016, upon the petition of the administrator seeking services with the former public official or employee that the need is critical to county operations.

(b) **Limits on contact with judicial or quasi-judicial proceedings:** No former county public official or employee for twelve (12) months following the date on which he/she ceases to be a county public official or employee, shall for compensation on behalf of himself/herself or any person other than a governmental entity, make any formal or informal appearance before, or try to settle or arrange a matter by calling, writing, or conferring with, any county public official, officer or employee of a department in connection with any judicial or quasi-judicial proceeding, application, contract, claim, or charge which was under the former public official's or employee's responsibility as a county public official or employee.

(c) **Limits on contacts with judicial or quasi-judicial proceedings where personally participated:** No former county public official or employee shall, whether for compensation or not, act on behalf of any party other than the county in connection with any judicial or quasi-judicial proceeding, application, contract, claim, or charge in which the former public official or employee participated substantially as a public official or employee.

(d) **Consideration of exemptions:** The ethics board shall accept and review written requests by former appointed officials for an exemption from the prohibitions of (3), except that only the committee on finance shall consider exemptions to the contractual services prohibition. Such exemption requests must be heard and deliberated during a properly convened open session of an ethics board meeting and must be included in a written ethics board opinion stating the reason(s) that the former appointed official should be exempt from the otherwise prohibited conduct.

### 9.06. Political activity.

(1) **Campaign prohibitions:** No county public official or employee at his or her place of employment while engaged in his or her official duties shall, for the apparent purpose of seeking to elect or defeat a person seeking elective office:

(a) Wear or display any campaign material.
(b) Distribute any campaign literature.
(c) Solicit contributions for any candidate.
(d) Engage in political campaign activities for any candidate.
(e) Circulate nomination papers for elected office.

(2) Coercion prohibited: No county employee shall in any way coerce or attempt to coerce contributions or services from subordinate employees in support of a political party or a candidate for elective office or for or against a referendum position, or retaliate against or reward an employee for refraining from participating in any political activity.

(3) Prohibition on rewards: No county elected official or candidate for a county elected office shall promise an appointment to any county position as an apparent reward for any political activity.

9.07. Ethics board; composition, appointment, staffing and meetings.

(1) The ethics board shall be composed of:

(a) Six (6) members: Six (6) adult residents of the county;

(b) Nominating authorities: The nominating authorities shall be the following entities:

1. President of the National Association for the Advancement of Colored People (NAACP)
2. Board chair of public policy forum
3. Board chair of greater Milwaukee committee
4. President of the Milwaukee Bar Association
5. Board chair of inter-faith conference of greater Milwaukee
6. President of the board of the league of women voters of Greater Milwaukee

The nominating authorities are leaders of longstanding, broad-based Milwaukee County entities interested in good government and institutional integrity. Ethics board members shall reflect the racial and ethnic diversity of Milwaukee County, serve the residents of Milwaukee County according to their oaths of office and act independently from the nominating and appointing authorities.

(c) Completion of terms: Upon the effective date of this Code, current ethics board sitting members shall complete their respective current terms, to preserve continuity and experience on the ethics board.

1. Any sitting member at the time of the effective date of this Code is eligible for reappointment to the ethics board by the nominating entities.
2. Any sitting member at the time of the effective date of this Code, if nominated by an appointing entity for a six-year term, would not be subject to the limitations of (g) for that initial nomination.

(d) Solicitation of nominations: The county executive shall solicit nominations from the nominating authorities for term appointments according to the order in which they are listed above.

(e) Nomination procedure: Each nominating authority, upon request of the county executive, shall submit the names of two (2) nominees to the county executive who shall then select and submit the name of one (1) of the nominees as an appointee to the county board for confirmation.

1. The county executive shall notify a nominating entity one hundred eighty (180) days before a term is expiring which the nominating entity is to fill.
2. The nominating entity shall submit a nomination(s) to the county executive one hundred twenty (120) days before the expiration of the term of the impending vacancy.

3. In the event of a vacancy during a member's term, the county executive will provide immediate notification of the vacancy.
   
i. The notification shall be provided to the nominating entity which nominated the member who is leaving the ethics board.

   ii. The nominating entity must submit nominations of two (2) names to the county executive within thirty (30) days.

   iii. If the mid-term vacancy is of a ethics board member appointed prior to the effective date of this Code, then the county executive will notify the nominating entity which is charged with the next nomination, as provided in subsection 9.07(1)(d).

   iv. A resume of each nominee for appointment to the ethics board shall be submitted to the county executive. The county executive shall submit the name of his/her appointee to every member of the county board at least thirty (30) days prior to county board action on confirmation of the nominee for appointment.

   v. Upon receiving the nomination from the nominating entity, the ethics board's executive director shall provide to the appointee all pertinent information concerning ethics board member's authority and duties and ethics board operations.

   (f) Six-year term: Except as provided in subsection 9.07(1)(c), a member shall be nominated and appointed for a term of six (6) years.

   (g) Limit of two (2) consecutive terms: A member shall be limited to two (2) consecutive terms but in no event shall a member be appointed for more than twelve (12) consecutive years.

   (h) Election of chair and vice chair: The chair and vice chair shall be elected annually at the annual meeting, pursuant to section 9.07(3)(b). In the event of a vacancy in the office of chair, the ethics board shall elect the chair in a properly convened meeting and in open session pursuant to section 9.07(3)(c)(2).

   (i) Member cannot be county public official or employee: A member shall not hold any other public office or employment in the government of the county while serving on the ethics board.

   (j) Candidates for public office must resign: A member of the ethics board who officially files as a candidate for public office while serving on the ethics board must resign his/her position on the ethics board or be subject to removal by the ethics board.

   (k) Removal of board members only for cause: Removal from the ethics board shall be for cause, according to the rules and procedures of the ethics board

(2) Appointment of executive director and additional personnel: The county executive shall appoint, subject to confirmation by the county board, an executive director who shall perform such duties as the ethics board assigns to him/her. The county board shall provide such additional personnel as may be required in the administration of this chapter and execution of the duties of the ethics board.

(3) (a) Four (4) meetings per year: The ethics board shall meet at least four (4) times per year.

   (b) February annual meeting: A February meeting will be designated as the annual meeting of the ethics board.

   (c) Method of calling meetings: All mandatory or additional meetings of the ethics board:

      1. Shall be called by the chair; or
2. By a minimum of three (3) members of the ethics board upon written request to the executive director.

(4) **Affirmative vote for action:** Any action by the ethics board shall require an affirmative vote of four (4) members.

### 9.08. Duties of the ethics board.

1. **Authority:** The ethics board shall serve as the primary authority for interpreting the Code, for applying the Code to written requests for advisory opinions and formal opinions, for deciding the outcome of verified complaints, for conducting meetings and for establishing policies and procedures for internal operations except for the provisions of subsection 9.09(3) relating to the corporation counsel.

2. **Written rules of policy and procedures:** The ethics board shall adopt such written rules of policy and procedure to execute its duties and obligations under this chapter. The ethics board rules shall be made available for public inspection and reference.

3. **Forms:** The ethics board shall prescribe and make available forms for use under this chapter.

4. **Records for public inspections:** The ethics board shall accept and file and have available for public inspection any information related to the purposes of this chapter which is supplied by any person, in addition to the information required by this chapter excepting that which this chapter provides is not to be made available for public inspection or scrutiny.

5. **Preserve statements of economic interests for six (6) years:** The ethics board shall preserve the statements of economic interests filed with the ethics board for a period of six (6) years from the date of receipt in such form as will facilitate document retention.

6. **Report of inquiry to individual who filed statement of economic interests:** The ethics board shall report in writing to the individual who filed a statement of economic interests, as soon as possible, the identity of any individual seeking to copy or obtain information from a statement of economic interests. This subsection does not apply to the ethics board or to any individual acting on behalf of the ethics board.

7. **File and communicate determinations:** The ethics board shall file and publicly communicate the determinations of verified complaints and formal opinions, according to the provisions of section 9.09.

8. **Retain advisory opinions:** The ethics board shall retain advisory opinion requests and opinions, according to the provisions of section 9.09.

9. **Prepare and file annual report:**
   
   (a) The annual report shall be prepared and approved by the ethics board no later than April 1 of each succeeding year.

   (b) The annual report shall be submitted to the county executive and the county board.

   (c) The annual report will report on the ethics board’s actions, compliance with prescribed duties, operations and activities during the preceding calendar year, including a summary of its determinations, a synopsis of each advisory opinion issued under section 9.09 of the code, a synopsis of each finding by the ethics board that a violation of the Code was committed, and the current and complete text of all opinions issued by the ethics board.

   (d) Such synopses shall be redacted to remove names and any other information that would disclose identifying information of any individual county public official or employee seeking the advisory opinion or any person or entity discussed in the advisory opinion.

10. **Public education:** Assist and cooperate with other county entities in the public education regarding the Code, amendments to the code, and advisory and formal opinions issued by the ethics board.
(11) **Retain experts:** Retain outside counsel, hearing examiners, and other experts as needed after solicitation of recommendations from corporation counsel and upon such contract for services approved for form and content by corporation counsel.

(12) **Conduct investigations:** Conduct investigations, order hearings of verified complaints and hear cases of verified complaints.

### 9.09. Advisory opinion, formal opinions, corporation counsel opinions, investigation requests and verified complaints.

(1) **Advisory opinion:**

(a) **Request for advisory opinion:** A request may be made of the ethics board for an advisory opinion:

1. By any individual, either personally or on behalf of an organization or governmental body, regarding the propriety of any matter to which the person is or may be engaged in as provided by section 9.09.

2. By any appointing authority, with the consent of a prospective appointee to a county office or position of employment in county service, regarding the propriety of any matter in which the prospective appointee is or may be engaged, as provided under section 9.09.

3. Or an advisory opinion may be requested from the governmental accountability board by the corporation counsel as provided in subsection 9.09(3).

(b) **Advisory opinion requests closed from public inspection:** Requests for advisory opinions, records obtained or filed in connection with requests for such advisory opinions and advisory opinions rendered by the ethics board shall be closed to public inspection.

(c) **[Ethics board:]** The ethics board shall review a request for an advisory opinion and may advise a person or organization making the request.

1. Advisory opinion requests shall be in writing.

2. Advisory opinion requests are not "public records" pursuant to ch. 19, Wis. Stats., unless the person or organization requesting the advisory opinion or the person who is the subject of the advisory opinion requests, in writing, that the matter be made part of the public record.

3. It is prima facie evidence of intent to comply with this chapter when a person refers a matter to the ethics board and abides by the ethics board’s advisory opinion, if the material facts are as stated in the written opinion request.

4. The ethics board's deliberations and actions upon such requests shall be in properly noticed meetings and held in closed session, pursuant to state statute, unless the person or organization requesting the advisory opinion or the person who is the subject of the advisory opinion requests, in writing, that the matter be heard and deliberated in open session.

5. No member or employee of the ethics board may make public the identity of the individual requesting an advisory opinion or of individuals or organizations mentioned in the opinion.

6. Advisory opinion shall be written and provided to the requesting party. The written advisory opinion and the records obtained or filed in connection with requests for such advisory opinion shall be filed with the ethics board and closed to public inspection.

7. This provision shall not be interpreted to preclude the ethics board from compiling or publishing summaries of advisory opinions that are redacted to remove any information that would disclose the identity of any individual or organization.
(2) **Formal opinions:** The ethics board may issue a formal opinion interpreting the ethics code or applying the ethics code to postulated facts without a request from a county public official or employee. This process allows the board to interpret the application of the Code to a universal concern and to address an issue that might not otherwise be raised in an advisory opinion request, investigation request or a verified complaint. Formal opinions serve as an educational tool for Code compliance and a means for persons to avoid engaging in an activity that might otherwise become a matter for the investigation request or the verified complaint processes.

(a) If the ethics board determines that a formal opinion would provide useful guidance on an issue of broad concern or assist individuals who are subject to the Code to comply with its terms, the ethics board shall adopt a resolution to that effect which identifies the issue the ethics board intends to address.

(b) Upon adoption of such a resolution, the ethics board shall discuss that issue in a properly noticed meeting pursuant to the open meetings law.

(c) Formal opinions shall be written, filed with the ethics board, included in the annual report and public record and provided for public inspection.

(d) The records obtained or filed in connection with formal opinion resolutions shall be filed with the ethics board and available for inspection.

(3) **Corporation counsel opinions:**

(a) A county public official or employee or other person may request in writing that the ethics board obtain an advisory opinion from the corporation counsel regarding the application of this chapter to a given set of circumstances.

(b) The ethics board may request in writing an advisory opinion from corporation counsel.

(c) Any written advisory opinion requested of corporation counsel under this section is subject to the provisions and process of subsection 9.09(1).

(d) The ethics board may authorize the corporation counsel to act in its stead in instances where delay is of substantial inconvenience or detriment to the requesting party. In such instances it is prima facie evidence of intent to comply with this chapter when the requesting party abides by the corporation counsel's written advisory opinion, if the material facts are as stated in the written opinion request.

(e) The corporation counsel may request an advisory opinion under s. 5.05(6a) of Wis. Statutes from the governmental accountability board when requested by the ethics board or county board.

(4) **Investigation requests and verified complaints:**

(a) **Investigation requests and verified complaints in writing:** Investigation requests shall be in writing and signed. The ethics board shall review them. Verified complaints shall be in writing and sworn to as provided in subsection 9.02(20). The ethics board shall review them.

(b) **Timely filing required:** Pursuant to ch.19, Wis. Stats., when an investigation request or verified complaint is filed it does not become part of the public record. No action may be taken on any verified complaint that is filed later than three (3) years after a violation of the Code is alleged to have occurred. On-going alleged violations that began earlier than three (3) years after being alleged in an investigation request or verified complaint may be reviewed to the point of origination, included in the hearing on the verified complaint, and be found to be violations of the Code.

(c) **Referral to the district attorney:** After filing with the ethics board, copy of the verified complaint shall be provided to the district attorney. The ethics board will not act on the verified complaint if a delay is requested by the district attorney. A copy of any investigation request shall be provided to the district
attorney after the investigation request is approved by the ethics board. The ethics board shall delay further action on the investigation request if requested by the district attorney.

(d) **Release by district attorney:** The ethics board may review the verified complaint when released by the district attorney.

(e) **Not public records:** Investigation requests and verified complaints are not "public records" unless the person who is the subject of the investigation request or verified complaint requests, in writing, that the matter be made part of the public record.

(f) **Notification to accused:** Within ten (10) days of receiving a verified complaint or approving an investigation request, the board shall forward to the subject of the investigation request or verified complaint a copy of it and a general statement of the applicable code provisions with respect to such investigation request or verified complaint unless a delay is requested by the district attorney.

(g) **Compliance with open meeting law:** The ethics board's deliberations and actions upon such investigation request or verified complaint shall be in properly noticed meetings and held in closed session, pursuant to state statute, unless the person who is the subject of the investigation request or verified complaint requests, in writing, that the matter be heard and deliberated in open session.

(h) **No disclosure of identity:** No member or employee of the ethics board may make public the identity of the individual submitting the investigation request or verified complaint or of individuals or organizations mentioned in the investigation request or verified complaint.

(i) **Review in closed session:** The review of the investigation request or verified complaint shall proceed in closed session.

(j) **Written decisions:** Decisions on investigation requests or verified complaints shall be written and provided to the subject of the investigation request or verified complaint and filed with the ethics board.

1. If the ethics board determines that the review of the investigation request or verified complaint does not produce facts sufficient to merit a conclusion that a violation of the Code has occurred, it shall take no further action on the request or shall dismiss the complaint and notify the subject of the investigation request or verified complaint.

2. If the board determines that the investigation request provides a basis for finding probable cause exists sufficient to constitute a violation of the Code, the ethics board may make, upon its own motion in closed session, a verified complaint. It shall be in writing, and shall state the alleged specific acts or omissions constituting a violation of the Code by an identified person subject to the Code. Such verified complaint would follow the provisions of section 9.10 et. seq.

(k) **Harassment disclosure:** If the board determines that the investigation request or verified complaint was brought for harassment purposes, the board shall so state.

(l) **Not public records:** Investigation requests or verified complaints that do not result in decisions that an alleged code violation exists would not be "public records." This provision shall not be interpreted to preclude the ethics board from compiling or publishing a summary of the unsubstantiated investigation requests that are redacted to remove any information that would disclose the identity of any individual or organization.

(m) **Public records:** Verified complaints that result in findings of Code violations would become "public records" upon completion of all ethics board proceedings.

(1) Preliminary conference:

(a) Voluntary resolution: Every effort should be made to voluntarily resolve an allegation that the ethics code has been violated.

(b) Board procedure: Following the release by the district attorney of an investigation request or a verified complaint that provides a reasonable basis for the belief that a violation of the Code has or might have occurred or is ongoing, the ethics board shall schedule a preliminary conference during the closed session of a properly noticed ethics board meeting.

(c) The ethics board shall notify both the person who filed the investigation request or verified complaint and the person who is the subject of the request or the complaint that a preliminary conference has been scheduled for closed session.

(d) The ethics board shall state in the notice the nature and purpose of the preliminary conference and the actions or activities to be discussed, and that those notified of the conference may bring evidence or witnesses with them for review.

(e) The ethics board shall confer with each party separately.

1. The ethics board shall administer an oath to each person appearing in the matter.

2. The person who submitted the investigation request or the verified complaint shall meet with the ethics board first.

3. The person(s) who is subject to the investigation request or verified complaint shall meet subsequently with the ethics board.

4. If the ethics board needs additional information it may pursue it on its own. The ethics board also shall provide both persons— the person who submitted the investigation request or verified complaint and the subject(s) of the investigation request or verified complaint, additional time for submission of any further evidence or witness appearance. If necessary, the ethics board shall extend the preliminary conference and establish an additional meeting time to complete the preliminary conference.

5. After obtaining all the information it needs, the ethics board will deliberate in closed session without either or any of the parties present.

(2) Preliminary conference outcomes:

(a) Dismissal: If the ethics board determines that probable cause does not exist to find that a violation of the Code has occurred or that the matter does not warrant further action, it shall dispose of the investigation request or verified complaint through written dismissal.

(b) Dismissal with conditions: If the ethics board determines during the course of the preliminary conference that the subject of the investigation request or verified complaint recognizes that a minor violation of the Code has occurred, which has been rectified or will be rectified, the ethics board may enter into a stipulation with the subject of the investigation request or the verified complaint, and shall issue a written dismissal of the request or complaint on condition that the matter can be reopened if similar or other minor violations occur within three (3) years. The stipulation will remain part of the closed record.

(c) Settlement: If the ethics board determines during the course of the preliminary conference that actions or omissions of the subject of the investigation request or verified complaint constitute significant violations of the Code, it may enter into a settlement pursuant to section 9.13.
(d) **Investigation request; order to hearing:** If the ethics board determines during the course of the preliminary conference that actions or omissions of the subject of the investigation request constitute significant violations of the Code, it may, on its own motion, file a verified complaint and shall issue an order to proceed to the hearing process and set a date for a hearing to determine whether a violation of the Code has occurred.

(e) **Verified complaint:** Order to hearing: If the ethics board determines during the course of the preliminary conference that the actions or omissions of the subject of the verified complaint constitute violations of the Code, it shall issue an order to proceed to a hearing to determine whether a violation of the Code has occurred.

(f) **Amendment:** If the ethics board determines during the course of the preliminary conference that violation(s) of the Code allegedly exist, other than the violations alleged in the investigation request or verified complaint, it may draft or amend the investigation request or verified complaint, upon its own motion, to include such violation(s).

(3) **Prehearing process:**

(a) **Notice and copy of order:** The ethics board shall mail a copy of the order to proceed to a hearing to each subject of the verified complaint who is identified in the motion together with a notice informing the subject of the verified complaint that the matter will proceed to the hearing process. The notice shall include the written motion, a general statement of the applicable provisions of the Code that will be considered at the hearing and the date set for the hearing. Service of the notice is complete upon mailing.

(b) **Hearing within thirty (30) days:** A hearing ordered under this subsection shall be commenced within thirty (30) days after the date it is ordered unless the subject(s) of the verified complaint and hearing order petition(s) in writing for a later date and the Board consents in writing.

(c) **Discovery rights:** Prior to convening any hearing ordered under this subsection the subject(s) of the verified complaint and hearing order is entitled to reasonable discovery rights including adverse examination of witnesses who will testify at the hearing at a reasonable time before the date of the hearing.

(d) **Exculpatory evidence:** The ethics board shall inform the subject(s) of the verified complaint and the hearing order of his/her/their counsel of exculpatory evidence in its possession.

9.11. **Hearing procedure.**

(1) During any hearing the members of the ethics board will be the finders of fact, decide the conclusions of law and issue orders. They will determine whether a violation of the Code has occurred. All evidence that the ethics board considers shall be fully offered and made a part of the record in the proceedings. The subject(s) of the hearing or any other person under investigation shall be afforded an adequate opportunity to rebut or offer countervailing evidence.

(2) The ethics board shall appoint a hearing examiner to conduct the hearing. The ethics board may also retain outside counsel and other experts as needed with respect to the hearing, in accordance with its policies. The selection of a hearing examiner and outside counsel or other experts and any contract for such persons shall be made after solicitation of recommendations from corporation counsel and the contract shall be approved for form and content by corporation counsel.

(3) Any person, other than the subject(s) of the hearing, whose name is mentioned or who is otherwise identified during a hearing being conducted by the ethics board, and who, in the opinion of the ethics board, may be adversely affected thereby, may, upon written request of the person or counsel of the person, or upon the request of any member of the ethics board, appear at the hearing to testify on his or her own
behalf or have counsel appear to represent his/her interests, and the ethics board may permit any other person to appear and testify at a hearing.

(4) Chapters 901 to 911, Wis. Stats., apply to the admission of evidence at the hearing.

(5) The ethics board shall not find a violation of the Code except upon clear and convincing evidence admitted at the hearing, according to an affirmative vote of four (4) members of the ethics board.

(6) The hearing examiner during the hearing on behalf of and/or at the behest of the ethics board shall have the power to require any person to submit, in writing, such reports and answers to questions relevant to the proceedings conducted under the Code as the ethics board may prescribe, such submission to be made within such reasonable time period and under oath or otherwise as the ethics board may determine. The hearing examiner shall have the power:

(a) To administer oaths and to require by subpoena the attendance and testimony of witnesses and the production of any documentary evidence relating to the hearings being conducted.

(b) To order testimony to be taken by deposition before any individual who has the power to administer oaths and, in such instances, to compel testimony and the production of evidence.

(c) To order the payment of witnesses the same fees and mileage as are paid in like circumstances by the courts of this state.

(d) To request and obtain from the department of revenue copies of state income tax returns and access to other appropriate information regarding all persons who are the subject of the hearing pursuant to ch. 19, Wis. Stats.

(7) During the hearing the subject(s) of the hearing proceedings or the subject(s) of the verified complaint may be represented by counsel of his or her own choosing.

(8) During the hearing, the subject(s) of the hearing or his or her or their counsel, if any, shall have an opportunity to examine all documents admitted at the hearing, to bring witnesses, to establish all pertinent facts and circumstances, to question or refute testimony or evidence, including the opportunity to confront and cross examine adverse witnesses, and shall otherwise be able to exercise reasonable discovery.

(9) After the conclusion of the hearing the ethics board shall as soon as practicable begin deliberations on the evidence presented at such hearing and shall then proceed to determine whether the subject(s) of the hearing violated the Code.


(1) If the ethics board determines that no violation of the Code has occurred, it shall immediately send written notices of such determination to the subject(s) of the hearing. Such a determination will not become part or the public record.

(2) If the ethics board determines that a violation of the Code has occurred it must prepare its findings of fact and conclusions of law that a violation(s) of the Code occurred, and it must make one (1) or more of the following orders and recommendations:

(a) An order requiring the subject of the hearing to conform his/her conduct to the Code.

(b) An order requiring an individual who has been determined to have violated the Code to forfeit an amount not less than one hundred dollars ($100.00) nor more than one thousand dollars ($1,000.00) for each violation of the Code, along with a payment deadline.

(c) An order for the specified return of county property or funds or gifts and/or restitution for the value of gifts, property and funds procured, obtained or retained as a result of the Code or in violation of the Code.
(d) Such other recommendation(s) or order(s) as may be necessary, appropriate and consistent with the intent and purposes of the Code.

(e) An order in any case when the ethics board determines that a violation has occurred that includes, when the determination warrants, a recommendation that the subject of the order be censured, suspended or removed from office or employment.

1. In the case of a county public official, a recommendation shall be made to the appropriate appointing authority or county body that may censure, suspend or take action to remove the official from office or employment.

2. In the case of a county employee, a recommendation shall be made to the appropriate appointing authority or county body that the county employee be disciplined or discharged.

(f) An order that the findings of fact, conclusions of law and orders be made part of the public record, including instructions that certain information should be sealed or redacted based on the need to protect persons and documents that in the judgment of the ethics board should not be part of the public record.

(3) The corporation counsel, when so requested by the ethics board, shall institute a civil proceeding under ch. 778, Wis. Stats., to recover any forfeiture, restitution or declaratory order incurred under this section which has not been timely complied with by the subject of the order. Any forfeiture or other funds recovered under this section shall be remitted to the county treasurer. Any property ordered returned shall be returned to the county department or entity from which the property was taken, or to any other person or entity providing a gift.

(4) No county entity, public official or employee shall authorize the subrogation of forfeitures, funds, restitution, attorney fees and costs, or anything of value to assist a person subject to a finding in an ethics board hearing order.


(1) Authority: The ethics board may compromise and settle any action or potential action or a violation of the ethics code on such terms as may be agreed upon between the ethics board and the subject of the investigation or hearing. A compromise and settlement under this section may include any of the orders or recommendations which the ethics board is authorized to make under section 9.12 of the ethics code.

(2) Written agreement: Whenever the ethics board enters into a compromise and settlement agreement under this section with an individual who has been alleged to have violated the ethics code in an investigation request or verified complaint or who is subject to the hearing process for a possible violation of the ethics code, the ethics board shall reduce the agreement to writing for signature by the ethics board chair and by the subject of the investigation or verified complaint process. The ethics board shall also prepare a written statement of the findings of the ethics board concerning the alleged violation and the ethics board’s reasons for entering into the agreement, which statement shall be retained as part of the public record.

(3) Four (4) votes required: A written settlement agreement can be entered into by the ethics board only upon the affirmative vote of four (4) members of the ethics board.


(1) Every county elected official, appointed official or employee is encouraged to meet with clubs, conventions, special interest groups, political groups, school groups, and other gatherings to discuss the affairs of the county relative to the duties of that official or employee. Such public officials and employees present at such meeting relative to their duties as a public official or employee shall avoid accepting anything of value, not
including the value of food and beverage offered coincidentally with a talk or meeting, if it could reasonably be expected to influence the public official's or employee's vote, official actions or judgment, or could reasonably be considered as a reward for any official action or inaction or omission by the public official or employee.

(2) (a) Except as provided for in paragraph (b), every county public official or employee who is required to file a statement of economic interests, pursuant to section 9.03 and who receives any lodging, transportation, money, or other thing with a combined pecuniary value exceeding fifty dollars ($50.00), not including the value of food or beverage offered coincidentally with a talk or meeting, shall report on his/her statement of economic interests the identity of every person from whom the county public official received such lodging, transportation, money, or other things during the preceding taxable year, the circumstances under which it was received, whether the gift was given by or on behalf of a county vendor contracted to work with that official or employee's department and the approximate value thereof.

(b) A county public official or employee need not report on his/her statement of economic interests under paragraph (a) any compensation, reimbursement, or payment which:
1. The county public official or employee returns to the payer within thirty (30) days of receipt;
2. The county public official or employee can show by clear and convincing evidence was made for a purpose unrelated to the purposes specified in subsection (1) and unrelated to the duties or responsibilities of the position of the public official or employee;
3. The county public official or employee has previously reported to the ethics board as a matter of public record; or
4. The county public official or employee is paid by that branch of county government or county department or agency in which the public official or employee is empowered or to which he/she has been elected.

(3) Notwithstanding section 9.05, a county public official or employee may receive and retain reimbursement or payment of actual and reasonable expenses for a published work or for participation in a meeting and may receive and retain reasonable compensation if the work is published or the activity is accomplished by the county public official or employee without the use of the county's time or resources or property and outside the course of his/her official duties.

(4) If any county public official or employee, whether or not required to file a statement of economic interests, receives a payment not authorized by the Code, in cash or otherwise, for a published work or talk or meeting, the county public official or employee may not retain that payment. The county public official or employee shall deposit that payment in the general revenue account of the county, or the county public official or employee shall return that payment or its equivalent to the payer pursuant to subsection 9.14(2)(b)1. If the county public official or employee is required to file a statement of economic interests, he/she shall report the payment prohibited by the provision when filing his/her next required statement of economic interests.

LEGISLATIVE HISTORY

All sections effective upon passage and publication unless otherwise indicated.


9.02(20). Renumbered as (21) and new (20) created - Nov. 3, 2016, J. Proc.


9.03(2)[Para.]. Created - May 26, 2016, J. Proc.


HISTORY NOTE

(Ord. No. 12-14, § 2, 5-24-12; Ord. No. 16-7, § 1, 3-17-16; Ord. No. 16-9, § 2, 5-26-16; Ord. No. 16-11, § 1, 5-26-16; Ord. No. 16-24, § 1, 11-3-16; Ord. No. 17-5, § 1, 2-2-17; Ord. No. 20-1, § 1, 3-26-20; Ord. No. 20-5, § 2, 5-14-20; Ord. No. 21-9, § 1, 9-23-21; Ord. No. 22-2, §§ 1, 2, 12-16-21)
October 3, 2023

U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410

RE: Commitment of Leveraged Funding

Dear HUD Review Panel:

Milwaukee County Department of Health and Human Services, Housing Services (MCHS); commits to leverage funds in the amount of $26 million dollars on behalf of our application to U.S. Department of Housing and Urban Development Community Planning and Development, Pathways to Removing Obstacles to Housing (PRO Housing) grant solicitation, FR-6700-N-98. The leveraged funding is fully available of the specific activities proposed in our PRO Housing grant application.

MCHS has been at the forefront of addressing and removing barriers to affordable housing. Through the American Rescue Plan Act (ARPA), Congressional Directed Spending Award and HOME Entitlement funding, MCHS has begun to initiate programming to 1) contract with developers to produce affordable multi-family rental developments, 2) rehabilitate Milwaukee County-owned foreclosed properties to produce single-family homes, and 3) provide down payment assistance for families.  These funds fully align with the proposed activities outlined in our application. Specifically:

1. MCHS commits leverage $3 million in ARPA funding to rehabilitate foreclosed properties that Milwaukee County controls due to tax delinquencies. The ARPA funding will be expended at the end of 2026. If award PRO Housing funding, an additional 10 – 15 single-family homes will be produced.

2. MCHS commits to leverage 15 million in ARPA funding, $3 million in HOME Entitlement and $5 million in HUD Congressional Directed Spending to increase the supply of affordable housing in Milwaukee County’s suburban municipalities. The leveraged funds provide targeted opportunities for first-time homebuyers to purchase County foreclosed homes in suburban municipalities. Funds are used to rehabilitate the properties and provide down payment assistance to low/moderate income households, specifically those previously on Section 8 rental assistance. MCHS' proposed PRO Housing program aligns with the current awards and will be able to increase the number of families to be able to secure down
payment funding to be able to purchase the foreclosed housing that have been rehabilitated. ARPA and HOME funds are used as gap financing for projects that have identified other sources of funding to be used as leverage including Low Income Housing Tax Credits. If awarded PRO Housing funding, MCHS will utilize the funding to support the production of additional affordable housing units.

Although MCHS has received $26,000,000 for affordable housing and single-family home production, to achieve the goal of advancing racial equity by providing a quality affordable home for every Milwaukeean an additional $10,000,000 is needed to maximize our existing production model. PRO Housing funding will aid in Milwaukee County’s vision that by achieving racial equity, Milwaukee is the healthiest county in Wisconsin. Racial equity will be achieved when race no longer predicts health outcomes and outcomes for everyone.

Attached to this commitment letter is documentation of the leveraged funding and purpose.

Sincerely,

James Mathy
Housing Administrator
Milwaukee County Housing Division
A report from the Director, Department of Health and Human Services (DHHS), requesting approval of $19 million in American Rescue Plan Act (ARPA) funds to expand housing and energy assistance opportunities in Milwaukee County, by recommending adoption of the following:

A REVISED RESOLUTION

WHEREAS, Milwaukee County (the County) recognizes that housing is a main social determinant of health; and

WHEREAS, the County is committed to the expansion of affordable housing opportunities throughout its municipalities; and

WHEREAS, the County controls the disposition of Milwaukee tax foreclosures outside the City of Milwaukee; and

WHEREAS, the County supports expanding affordable home ownership through the sale of tax foreclosed homes; and

WHEREAS, the American Rescue Plan Act Task Force approved $15 million for affordable housing development, and $3 million for foreclosure rehabilitation at its meeting on May 12, 2022; and

WHEREAS, the Committee on Finance, at its meeting of June 16, 2022, recommended adoption of File No. 22-702 (vote 7-0); now, therefore,

BE IT RESOLVED, the Milwaukee County Board of Supervisors (County Board) authorizes the use of $18 million of American Rescue Plan Act (ARPA) State and Local Fiscal Recovery Funds for affordable housing development in the amount of $15 million, and foreclosure rehabilitation funds in the amount of $3 million; and

BE IT FURTHER RESOLVED, the County Board authorizes the administrating department, the Department of Administrative Services (DAS), the Office of Corporation Counsel, Risk Management Division, DAS, Community Business Development Partners, DAS, the Office of the Comptroller (Comptroller), the Office of Strategy, Budget, and Performance (OSBP), and the County Executive, to prepare, review, approve, and execute all contracts and other documents, and take all actions as required for the purpose of administering the above-referenced programs funded by the ARPA grant allocation framework; and
BE IT FURTHER RESOLVED, the County Board hereby authorizes OSBP, and
the Comptroller to process an administrative appropriation transfer in the amount of
$18 million to direct funds to the Department of Health and Human Services for the
housing assistance programs starting in 2022.
A report from the Director, Department of Health and Human Services (DHHS), requesting approval of $19 million in American Rescue Plan Act (ARPA) funds to expand housing and energy assistance opportunities in Milwaukee County.

The attached resolution or ordinance was adopted by the Milwaukee County Board of Supervisors on 6/23/2022 by the following vote:


Certification to County Board Passage
Marcelia Nicholson

Certification of County Board Passage
George Christenson

I approve the attached resolution or ordinance.
David Crowley

Received by County Clerk's Office
George Christenson
Congratulations on obtaining EDI Community Project Funding for Fiscal Year 2023! The Fiscal Year 2023 Omnibus ("omnibus") contains $2,982,285,641 in Economic Development Initiative for the purpose of Community Project Funding/congressional-directed grants. The FY 2023 grants portfolio will be administered by the Congressional Grants Division of the U.S. Department of Housing and Urban Development (HUD). HUD refers to these grants as Economic Development Initiative / Community Project Funding (EDI/CPF) grants. More information can be found here: Division L - THUD Statement FY23.pdf (senate.gov) starting on page 165.

To get you started, we have provided information about actions you can take now and additional information on the Federal requirements that govern these grants. Your grant identification number is included in the subject line. Please use that for all future correspondence.

Within approximately 30 days we will send an email to you that provides the Grant Award Letter (GAL) and various grant award materials. The letter outlines the requirements for the award and provides guidance on what forms and documents HUD will need from you to make these funds available to you.

We ask that you be prepared to provide information such as organization's Authorized Representative and submit the narrative and budget for the entire project. HUD does not receive the application materials that grantees previously sent to Congress; HUD encourages grantees to send this material to HUD as part of the submission of their project narrative and budget for both the grant agreement and environmental review processes.

You will also receive a Grant Agreement and other forms to complete, sign, and submit. Once we receive and verify the information requested in the GAL, we will send you the fully executed Grant Agreement and guidance that you will use to finalize setting up your account in our financial system to access the grant funds. (For a visual of the process, please see Process Flow on page 5.)

EDI/CPF grants are subject to a number of Federal requirements. HUD will provide additional information and further clarification regarding applicable requirements and the grant award process, including in upcoming webinars. The most essential requirements include:

- **Administrative Requirements**: EDI/CPF grants are subject to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR Part 200.
- **Environmental Review Requirements**: EDI/CPF grants, like all projects funded by HUD, are subject to requirements under the National Environmental Policy Act (NEPA), HUD's NEPA-implementing regulations at 24 CFR Part 50 or 24 CFR Part 58, and all appropriate federal environmental and historic preservation law, regulation, and Executive Order.

- HUD defines the "Federal Nexus" for a program or project as the event that triggers the requirements for federal environmental review under a host of laws, regulations, and Executive Orders, including the prohibition on choice limiting actions.
- For FY2023 grants, the date of the FY2023 enactment is the date of eligibility for reimbursement for hard and soft costs and the date of the federal nexus for compliance with all environmental laws. Therefore, reimbursable/eligible hard costs can be incurred after enactment, once a full environmental review is completed. (See Process Flow on page 5.)

- Note the following:
  - An environmental review must be completed before HUD funds and new commitments of non-HUD funds can be used on a project.
  - HUD has completed a Part 50 programmatic environmental review covering most soft costs for all FY23 CPF grants. Reimbursable CPF Soft costs covered by HUD's Part 50 review can be incurred from the date of legislative enactment on December 29, 2022. Taking or entering into new choice-limiting actions are not permitted after enactment of the omnibus until the environmental review process is complete. In addition, HUD will not be able to fund a project where work that occurred after enactment of the appropriations Act has resulted in unmitigable environmental harm.
  - Examples of Choice Limiting Actions include acquisition, leasing, rehabilitation, demolition, new construction, ground disturbance work such as clearing, grading, or grubbing, and entering into contracts for these activities. HUD's prohibition on choice limiting actions can be found at 24 CFR 58.22.
  - Because only "eligible costs" may be reimbursed, the Omnibus does not permit the reimbursement of costs that were not incurred in compliance with Federal environmental law, regulations and Executive Orders.
  - After enactment, grantees may not enter into construction contracts or make other choice limiting commitments or actions, including making a commitment of HUD or non-HUD funds to the project, until the environmental review process is complete.
  - The environmental review must be performed by a Responsible Entity under 24 CFR Part 50 or by HUD under 24 CFR Part 50 for every project or purpose authorized.
  - Additional information about environmental review compliance will be provided to grantees. In the meantime, basic orientation materials to the HUD environmental review process can be found here: https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/ overview.

If you have questions or need technical assistance, please contact us at CPFGrants@hud.gov and include your grant identification number and grant year.

Sincerely,

Robin Keegan
Deputy Assistant Secretary for Economic Development
Community Planning and Development
U.S. Department of Housing and Urban Development

---

<table>
<thead>
<tr>
<th>Benchmark</th>
<th>Grantee Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actions that you, as the grantee, can take now</td>
<td>Sign up for SAM5</td>
</tr>
<tr>
<td>Learn about Crosscutting Requirements</td>
<td>Register at SAM.gov</td>
</tr>
<tr>
<td>Prepare to Initiate Environmental Review Requirements</td>
<td>CPF Grants are subject to “cross-cutting” requirements which include, but are not limited to, compliance with environmental review, financial management, fair housing standards, and non-discrimination standards. <a href="https://www.hud.gov/program_offices/comm_planning/economic_development_initiative/community_project_funding">https://www.hud.gov/program_offices/comm_planning/economic_development_initiative/community_project_funding</a></td>
</tr>
<tr>
<td></td>
<td>More information will be included in the Grant Award Letter.</td>
</tr>
<tr>
<td></td>
<td>All projects funded by HUD are subject to requirements under the National Environmental Protection Act (NEPA) (24 CFR Part 50 and 24 CFR Part 58)</td>
</tr>
<tr>
<td></td>
<td>HUD grantees must not spend ANY project funds, except for soft costs covered by HUD's Part 50 environmental review, until the project completes a project-specific environmental review, and receives HUD approval, if applicable. Therefore, you are encouraged to commence the environmental review process for your project as soon as possible.</td>
</tr>
</tbody>
</table>
The environmental review must be completed by a “Responsible Entity” (RE) as defined at 24 CFR 58.2(7) or by HUD. An RE is the unit of general local government within which the project is located that exercises land use responsibility, or the Indian Tribe or Alaskan Native Village jurisdiction within which the project is located that exercises land use responsibility. In the event that an RE declines to assume responsibility for the environmental review, you must request that HUD complete the environmental review under 24 CFR Part 50.

As a clarification, grantees can incur soft costs after enactment, and can reimburse those soft costs after the execution of the grant agreement.

Identify your nearest HUD Regional Environmental Officer here: https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/region-i-regional-and-field-environmental-officers. Further information on the environmental requirements can be found here: https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/

HUD will also be providing trainings on environmental review. HUD has also initiated a technical assistance “Ask A Question” (AAQ) Desk for environmental review to support grantees in navigating the environmental review requirements. You can access the AAQ desk here: https://www.hudexchange.info/program-support/my-question/
This Grant Agreement between the Department of Housing and Urban Development (HUD) and Milwaukee County (the Grantee) is made pursuant to the authority of the Consolidated Appropriations Act, 2023 (Public Law 117-328) and the Explanatory Statement for Division L of that Act, which was printed in the Senate section of the Congressional Record on December 20, 2022 (Explanatory Statement).

In reliance upon and in consideration of the mutual representations and obligations under this Grant Agreement, HUD and the Grantee agree as follows:

ARTICLE I. Definitions

The definitions at 2 CFR 200.1 apply to this Grant Agreement, except where this Grant Agreement specifically states otherwise.

Budget period is defined in 2 CFR 200.1 and begins and ends on the dates specified above for the Period of Performance/Budget Period Start Date and Period of Performance/Budget Period End Date.

Period of Performance is defined in 2 CFR 200.1 and begins and ends on the dates specified above for the Period of Performance/Budget Period Start Date and Period of Performance/Budget Period End Date.

ARTICLE II. Total Grant Amount

Subject to the provisions of the Grant Agreement, HUD will make grant funds in the amount of $5,000,000 available to the Grantee.

ARTICLE III. Award-Specific Requirements

A. Federal Award Description. The Grantee must use the Federal funds provided under this Grant Agreement (Grant Funds) to carry out the Grantee’s “Project.” Unless changed in accordance with Article III, section C of this Grant Agreement, the Grantee’s Project shall be as described in the Project Narrative that is approved by HUD as of the date that HUD signs this Grant Agreement. For reference, HUD will attach this approved Project Narrative as Appendix 1 to the Grant Agreement on the date that HUD signs this Grant Agreement.
B. Approved Budget. The Grantee must use the Grant Funds as provided by the Approved Budget. Unless changed in accordance with Article III, section C of this Grant Agreement, the Approved Budget shall be the line-item budget that is approved by HUD as of the date that HUD signs this Grant Agreement. For reference, HUD will attach this approved line-item budget as Appendix 2 to this Grant Agreement on the date that HUD signs this Grant Agreement.

C. Project and Budget Changes. All changes to the Grantee’s Project or Approved Budget must be made in accordance with 2 CFR 200.308 and this Grant Agreement. To request HUD’s approval for a change in the Project or Approved Budget, the Grantee must submit a formal letter to the Director of HUD’s Office of Economic Development - Congressional Grants Division through the assigned Grant Officer. The letter must be submitted by email to the assigned Grant Officer and must provide justification for the change. The email submitting the letter must also include a revised project narrative or revised line-item budget, as applicable, that includes the requested change. The Grantee is prohibited from making project or budget changes that would conflict with the Applicable Appropriations Act Conditions described in Article III, section D of this Grant Agreement. The assigned Grant Officer for this grant is provided in the Award Letter for this grant and found on HUD’s website. The HUD Office of Economic Development – Congressional Grants Division will notify the Grantee in writing, by email, whether HUD approves or disapproves the change. Before the Grantee expends Grant Funds in accordance with any change approved by HUD or otherwise allowed by 2 CFR 200.308, the Grantee must update its grant information in Disaster Recovery Grant Reporting (DRGR) to reflect that change.

D. Applicable Appropriations Act Conditions. The conditions that apply to the Grant Funds as provided by the Consolidated Appropriations Act, 2023 and the Explanatory Statement are hereby incorporated and made part of this Grant Agreement. In the event of a conflict between those conditions, the conditions provided by the Act will govern. The Grant Funds are not subject to the Community Development Block Grants regulations at 24 CFR part 570 or Title I of the Housing and Community Development Act of 1974.

E. In accordance with 2 CFR 200.307(b), costs incidental to the generation of program income may be deducted from gross income to determine program income, provided these costs have not been charged to the grant. As authorized under 2 CFR 200.307(e)(2), program income may be treated as an addition to the Federal award, provided that the Grantee uses that income for allowable costs under this Grant Agreement. In accordance with 2 CFR 200.307(b), costs incidental to the generation of program income may be deducted from gross income to determine program income, provided these costs have not been charged to the grant. Any program income that cannot be expended on allowable costs under this Grant Agreement must be paid to HUD before closeout of the grant, unless otherwise specified by an applicable Federal statute.
F. The Grantee must use the Grant Funds only for costs (including indirect costs) that meet the applicable requirements in 2 CFR part 200 (including appendices). The Grantee’s indirect cost rate information is as provided in Appendix 3 to this Grant Agreement. Unless the Grantee is an Institution of Higher Education, the Grantee must immediately notify HUD upon any change in the Grantee’s indirect cost rate during the Period of Performance, so that HUD can amend the Grant Agreement to reflect the change if necessary. Consistent with 2 CFR Part 200, Appendix III (C.7), if the Grantee is an Institution of Higher Education and has a negotiated rate in effect on the date this Grant Agreement is signed by HUD, the Grantee may use only that rate for its indirect costs during the Period of Performance.

G. The Grantee must comply with any specific award conditions that HUD may attach to this Grant Agreement as provided by 2 CFR 200.208. If applicable, these conditions will be listed or added as Appendix 5 to this Grant Agreement.

H. The Grantee is responsible for managing the Project and ensuring the proper use of the Grant Funds. The Grantee is also responsible for ensuring the completion of the Project, the grant closeout, and compliance with all applicable federal requirements. The Grantee may subaward all or a portion of its funds to one or more subrecipients, as identified in the Project Narrative (Appendix 1) or as may be approved by HUD in accordance with 2 CFR 200.308. All subawards made with funding under this Grant Agreement are subject to the subaward requirements under 2 CFR Part 200, including 2 CFR 200.332, and other requirements provided by this Grant Agreement. The Grantee is responsible for ensuring each subrecipient complies with all requirements under this Grant Agreement, including the general federal requirements in Article IV. A subaward may be made to a for-profit entity only if HUD expressly approves that subaward and the for-profit entity is made subject to the same Federal requirements that apply to all other subrecipients, including the requirements 2 CFR part 200 provides for a “non-Federal entity” that receives a subaward.

ARTICLE IV. General Federal Requirements

A. If the Grantee is a unit of general local government, a State, an Indian Tribe, or an Alaskan Native Village, the Grantee is the Responsible Entity (as defined in 24 CFR part 58) and agrees to assume all of the responsibilities for environmental review and decision-making and action, as specified and required in regulations issued by the Secretary pursuant to section 305(c) of the Multifamily Housing Property Disposition Reform Act of 1994 and published in 24 CFR Part 58.

B. If the Grantee is a housing authority, redevelopment agency, academic institution, hospital or other non-profit organization, the Grantee shall request the unit of general local government, Indian Tribe or Alaskan Native Village, within which the Project is located and which exercises land use responsibility, to act as Responsible Entity and assume all of the responsibilities for environmental review and decision-making and action as specified in paragraph A above, and the Grantee shall carry out all of the responsibilities of a grantee under 24 CFR Part 58.
C. After December 29, 2022, neither the Grantee nor any of its contractors, subrecipients and other funding and development partners may undertake, or commit or expend Grant Funds or local funds for, project activities (other than for planning, management, development and administration activities), unless a contract requiring those activities was already executed on or before December 29, 2022, until one of the following occurs: (i) the Responsible Entity has completed the environmental review procedures required by 24 CFR part 58, and HUD has approved the environmental certification and given a release of funds; (ii) the Responsible Entity has determined and documented in its environmental review record that the activities are exempt under 24 CFR 58.34 or are categorically excluded and not subject to compliance with environmental laws under 24 CFR 58.35(b); or (iii) HUD has performed an environmental review under 24 CFR part 50 and has notified Grantee in writing of environmental approval of the activities.

D. Following completion of the environmental review process, the Grantee (recipient) shall exercise oversight, monitoring, and enforcement as necessary to assure that decisions and mitigation measures adopted through the environmental review process are carried out during project development and implementation.

E. The Grantee must comply with the generally applicable HUD and CPD requirements in 24 CFR Part 5, subpart A, including all applicable fair housing, and civil rights requirements. If the Grantee is a Tribe or a Tribally Designated Housing Entity (TDHE) as established under 24 CFR 1000.206, the Grantee must comply with the nondiscrimination requirements in 24 CFR 1000.12 in lieu of the nondiscrimination requirements in 24 CFR 5.105(a). The Grantee must report data on the race, color, religion, sex, national origin, age, disability, and family characteristics of persons and households who are applicants for, participants in, or beneficiaries or potential beneficiaries of the Grantee’s Project, consistent with the instructions and forms provided by HUD in order to carry out its responsibilities under the Fair Housing Act, Executive Order 11063, Title VI of the Civil Rights Act of 1964, and Section 562 of the Housing and Community Development Act of 1987 (e.g. HUD-27061).

F. The Grantee must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 CFR part 200, as may be amended from time to time. If 2 CFR part 200 is amended to replace or renumber sections of part 200 that are cited specifically in this Grant Agreement, the part 200 requirements as renumbered or replaced by the amendments will govern the obligations of HUD and the Grantee after those amendments become effective.

G. The Grantee must comply with the Award Term in Appendix A to 2 CFR Part 25 (“System for Award Management and Universal Identifier Requirements”) and the Award Term in Appendix A to 2 CFR Part 170 (“Reporting Subawards and Executive Compensation”), which are hereby incorporated into and made part of this Grant Agreement.

H. If the Total Grant Amount, as provided in Article II of this Grant Agreement, is greater than $500,000, the Grantee must comply with the Award Term and Condition for Grantee Integrity and Performance Matters in Appendix 4 to this Grant Agreement.
I. Unless the Grantee is exempt from the Byrd Amendment as explained below, the Grantee must comply with the provisions of Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR Part 87, which prohibit recipients of Federal contracts, grants, or loans from using appropriated funds for lobbying the executive or legislative branches of the Federal Government in connection with a specific contract, grant, loan, or cooperative agreement. The Grantee must include in its award documents for all sub-awards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements), the requirements for the certification required by Appendix A to 24 CFR Part 87 and for disclosure using Standard Form-LLL (SF-LLL), “Disclosure of Lobbying Activities.” In addition, the Grantee must obtain the executed certification required by Appendix A and an SF-LLL from all covered persons. “Person” is as defined by 24 CFR Part 87. Federally recognized Indian tribes and TDHEs established by Federally recognized Indian tribes as a result of the exercise of the tribe’s sovereign power are excluded from coverage of the Byrd Amendment. State-recognized Indian tribes and TDHEs established only under state law must comply with this requirement.


K. The Grantee must comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as implemented by regulations at 49 CFR Part 24. The URA applies to acquisitions of real property and relocation occurring as a direct result of the acquisition, rehabilitation, or demolition of real property for Federal or Federally funded programs or projects. Real property acquisition that receives Federal financial assistance for a program or project, as defined in 49 CFR 24.2, must comply with the acquisition requirements contained in 49 CFR part 24, subpart B. Unless otherwise specified in law, the relocation requirements of the URA and its implementing regulations at 49 CFR part 24, cover any displaced person who moves from real property or moves personal property from real property as a direct result of acquisition, rehabilitation, or demolition for a program or project receiving HUD financial assistance.

L. If Grant Funds are used for purchase, lease, support services, operation, or work that may disturb painted surfaces, of pre-1978 housing, you must comply with the lead-based paint evaluation and hazard reduction requirements of HUD’s lead-based paint rules (Lead Disclosure; and Lead Safe Housing (24 CFR part 35)), and EPA’s lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

M. The Grantee must comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. 1701u, and HUD’s regulations at 24 CFR part 75, as applicable, including the reporting requirements in 24 CFR 75.25. Grants made to Tribes and TDHEs are subject to Indian Preference requirements in Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5307(b)). As stated in 24 CFR 75.3(c), grants to Tribes and TDHEs are subject to Indian Preference requirements in lieu of Section 3. Grantees that are not exempt from Section 3 must submit annual reports of Section 3.
accomplishment Performance Measures in DRGR in January of the calendar year. This report reflects Section 3 accomplishments for the previous calendar year.

N. The Grantee must not use any Grant Funds to support any Federal, state, or local project that seeks to use the power of eminent domain, unless eminent domain is employed only for a public use. Public use includes use of funds for mass transit, railroad, airport, seaport, or highway projects, and utility projects which benefit or serve the general public (including energy-related, communication-related, water-related, and waste water-related infrastructure), other structures designated for use by the general public or with other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields, as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107-118). Public use does not include economic development that primarily benefits private entities.

O. The Grantee must not use any Grant Funds to maintain or establish a computer network that does not block the viewing, downloading, and exchanging of pornography. This requirement does not limit the use of funds necessary for any Federal, State, tribal, or local law enforcement agency or any other entity carrying out criminal investigations, prosecution, or adjudication activities.

P. The Grantee must administer its Grant Funds in accordance with the Conflict of Interest requirements set forth in Appendix 6 of this Grant Agreement.

Q. The Grantee must comply with the governmentwide debarment and suspension requirements in 2 CFR part 180 as incorporated and supplemented by HUD’s regulations at 2 CFR part 2424.

R. The Grantee must comply with the award term and condition regarding trafficking in persons in Appendix 7 of this Grant Agreement.

S. The assurances and certifications the Grantee has made and submitted to HUD are incorporated by this reference and made part of this Grant Agreement.

ARTICLE V. Drawdown Requirements

A. The Grantee may not draw down Grant Funds until HUD has received and approved any certifications and disclosures required by 24 CFR 87.100 concerning lobbying, if applicable.

B. The Grantee must use HUD’s Disaster Recovery Grant Reporting (DRGR) system to draw down Grant Funds and report to HUD on activities.

C. The Grantee must enter activity and budget information in DRGR that is consistent with the Grantee’s Project and Approved Budget as described in Article III, sections A and B of this Grant Agreement and complies with HUD’s instructions for entering information in DRGR found in the document titled “Grant Award Instructions” that accompanies the Grant Agreement.
D. The Grantee must only enter activities in DRGR that are described in the Approved Budget.

E. The Grantee must expend all Grant Funds in accordance with the activity and budget information in DRGR.

F. Each drawdown of Grant Funds constitutes a representation by the Grantee that the funds will be used in accordance with this Grant Agreement.

G. The Grantee must use DRGR to track the use of program income and must report the receipt and use of program income in the reports the Grantee submits to HUD under Article VI of this Grant Agreement. The Grantee must expend program income before drawing down Grant Funds through DRGR.

H. Notwithstanding any other provision of this grant agreement, HUD will not be responsible for payment of any Grant Funds after the date Treasury closes the account in accordance with 31 U.S.C. § 1552. Because Treasury may close the account up to one week before the September 30 date specified by 31 U.S.C. § 1552, the Grantee is advised to make its final request for payment under the grant no later than September 15, 2031.

ARTICLE VI. Program-Specific Reporting Requirements

In addition to the general reporting requirements that apply under other provisions of this Agreement, the following program-specific reporting requirements apply to the Grantee:

A. The Grantee must submit a performance report in DRGR on a semi-annual basis and must include a completed Federal financial report as an attachment to each performance report in DRGR. Performance reports shall consist of a narrative of work accomplished during the reporting period. During the Period of Performance, the Grantee must submit these reports in DRGR no later than 30 calendar days after the end of the 6-month reporting period. The first of these reporting periods begins on the first of January or June (whichever occurs first) after the date this Grant Agreement is signed by HUD.

B. The performance report must contain the information required for reporting program performance under 2 CFR 200.329(c)(2) and (d), including a comparison of actual accomplishments to the objectives of the Project as described in Article III, section A of this Grant Agreement, the reasons why established goals were not met, if appropriate, and additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

C. Financial reports must be submitted using DRGR or such future collections HUD may require and as approved by OMB and listed on the Grants.gov website (https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html).
D. The performance and financial reports will undergo review and approval by HUD. If a report submission is insufficient, HUD will reject the report in DRGR and identify the corrections the Grantee must make.

E. No drawdown of funds will be allowed through DRGR while the Grantee has an overdue performance or financial report.

F. The Grantee must report and account for all property acquired or improved with Grant Funds as provided by 2 CFR part 200 using the applicable common forms approved by OMB and provided on the Grants.gov website (https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html). This reporting obligation includes submitting status reports on real property at least annually as provided by 2 CFR 200.330, accounting for real and personal property acquired or improved with Grant Funds as part of Project Closeout, and promptly submitting requests for disposition instructions as provided by 2 CFR 200.311(c), 200.313(e), and 200.314(a).

ARTICLE VII. Project Closeout

A. The grant will be closed out in accordance with 2 CFR part 200, as may be amended from time to time, except as otherwise specified in this Grant Agreement.

B. The Grantee must submit to HUD a written request to closeout the grant no later than 30 calendar days after the Grantee has drawn down all Grant Funds and completed the Project as described in Article III, section A of this Grant Agreement. HUD will then send the Closeout Agreement and Closeout Certification to the Grantee.

C. At HUD's option, the Grantee may delay initiation of project closeout until the resolution of any findings as a result of the review of semi-annual activity reports in DRGR. If HUD exercises this option, the Grantee must promptly resolve the findings.

D. The Grantee recognizes that the closeout process may entail a review by HUD to determine compliance with the Grant Agreement by the Grantee and all participating parties. The Grantee agrees to cooperate with any HUD review, including reasonable requests for on-site inspection of property acquired or improved with Grant Funds.

E. No later than 120 calendar days after the Period of Performance, Grantees shall provide to HUD the following documentation:

1. A Certification of Project Completion.

2. A Grant Closeout Agreement.

3. A final financial report giving the amount and types of project costs charged to the grant (that meet the allowability and allocability
requirements of 2 CFR part 200, subpart E); a certification of the costs; and the amounts and sources of other project funds.

4. A final performance report providing a comparison of actual accomplishments with the objectives of the Project, the reasons for slippage if established objectives were not met and additional pertinent information including explanation of significant cost overruns.

5. A final property report, if specifically requested by HUD at the time of closeout.

ARTICLE VIII. Default

A default under this Grant Agreement shall consist of any use of Grant Funds for a purpose other than as authorized by this Grant Agreement, any noncompliance with statutory, regulatory, or other requirements applicable to the Grant Funds, any other material breach of this Grant Agreement, or any material misrepresentation in the Grantee’s submissions to HUD in anticipation of this award. If the Grantee fails to comply with the terms and conditions of the Grant Agreement, HUD may adjust specific conditions of this Grant Agreement as described in 2 CFR part 200, as may be amended from time to time. If HUD determines that noncompliance cannot be remedied by imposing additional conditions, HUD may take one or more of the remedies for noncompliance described in 2 CFR part 200, as may be amended from time to time. HUD may also terminate all or a part of this award as provided by 2 CFR 200.340 and other applicable provisions of 2 CFR part 200, as may be amended from time to time. Nothing in this Grant Agreement shall be construed as creating or justifying any claim against the Federal government or the Grantee by any third party.
ARTICLE IX. HUD Contact Information

Except where this Grant Agreement specifically states otherwise, all requests, submissions, and reports the Grantee is required to make to HUD under this Grant Agreement must be made in writing via email to CPFGrants@hud.gov.

This agreement is hereby executed on behalf of the Grantee and HUD as follows:

GRANTEE

______________________________________________________
(Name of Organization)

BY:    _________________________________________________
(Signature of Authorized Official)

_________________________________________________
(Typed Name and Title of Authorized Official)

_________________________________________________
(Date)

HUD

BY:  _________________________________________________
Robin J. Keegan,
Deputy Assistant Secretary for Economic Development

_________________________________________________
(Date)
APPENDIX 1 – Project Narrative
APPENDIX 3 – Grantee’s Indirect Cost Rate Information

Subject to the applicable requirements in 2 CFR part 200 (including its appendices), the Grantee will use an indirect cost rate as represented by the Grantee below:

☐ The Grantee will not use an indirect cost rate to charge its indirect costs to the grant.

☐ The Grantee will use the indirect cost rate(s) identified in the table below to charge its indirect costs to the grant.

<table>
<thead>
<tr>
<th>Agency/Dept./Major Function</th>
<th>Indirect cost rate</th>
<th>Direct Cost Base</th>
</tr>
</thead>
<tbody>
<tr>
<td>__________________________</td>
<td>______________%</td>
<td>______________</td>
</tr>
<tr>
<td>__________________________</td>
<td>______________%</td>
<td>______________</td>
</tr>
</tbody>
</table>

[PLEASE NOTE: The grantee must check one of the two boxes above. If the second box is checked, the corresponding table must be filled out as described below.

The table must include each indirect cost rate that will be used to calculate the Grantee’s indirect costs under the grant. The table must also specify the type of direct cost base to which each included rate applies (for example, Modified Total Direct Costs (MTDC)). Do not include indirect cost rate information for subrecipients.

For government entities, enter each agency or department that will carry out activities under the grant, the indirect cost rate applicable to each department/agency (including if the de minimis rate is used per 2 CFR 200.414), and the type of direct cost base to which the rate will be applied.

For nonprofit organizations that use the Simplified Allocation Method for indirect costs or elects to use the de minimis rate of 10% of Modified Total Direct Costs in accordance with 2 CFR 200.414, enter the applicable indirect cost rate and type of direct cost base in the first row of the table.

For nonprofit organizations that use the Multiple Allocation Base Method, enter each major function of the organization for which a rate was developed and will be used under the grant, the indirect cost rate applicable to that major function, and the type of direct cost base to which the rate will be applied.]
APPENDIX 4 –
Award Term and Condition for Grantee Integrity and Performance Matters

Reporting of Matters Related to Grantee Integrity and Performance

1. General Reporting Requirement
If the total value of the Grantee’s currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds $10,000,000 for any period of time during the period of performance of this Federal award, then during that period of time the Grantee must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in paragraph 2 of this award term and condition. This is a statutory requirement under section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.

2. Proceedings About Which Grantee Must Report
During any period of time when the Grantee is subject to the requirement in paragraph 1 of this award term and condition, the Grantee must submit the information required about each proceeding that:

a. Is in connection with the award or performance of a grant, cooperative agreement, or procurement contract from the Federal Government;

b. Reached its final disposition during the most recent five-year period; and

c. Is one of the following:

   (1) A criminal proceeding that resulted in a conviction, as defined in paragraph 5 of this award term and condition;

   (2) A civil proceeding that resulted in a finding of fault and liability and payment of a monetary fine, penalty, reimbursement, restitution, or damages of $5,000 or more;

   (3) An administrative proceeding, as defined in paragraph 5 of this award term and condition, that resulted in a finding of fault and liability and the Grantee’s payment of either a monetary fine or penalty of $5,000 or more or reimbursement, restitution, or damages in excess of $100,000; or

   (4) Any other criminal, civil, or administrative proceeding if:

      (i) It could have led to an outcome described in paragraph 2.c.(1), (2), or (3) of this award term and condition;
(ii) It had a different disposition arrived at by consent or compromise with an acknowledgment of fault on the Grantee’s part; and

(iii) The requirement in this award term and condition to disclose information about the proceeding does not conflict with applicable laws and regulations.

3. Reporting Procedures
During any period of time when the Grantee is subject to the requirement in paragraph 1 of this award term and condition, the Grantee must enter in the SAM Entity Management area the information that SAM requires about each proceeding described in paragraph 2 of this award term and condition. The Grantee does not need to submit the information a second time under assistance awards that the Grantee received if the Grantee already provided the information through SAM because the Grantee was required to do so under Federal procurement contracts that the Grantee was awarded.

4. Reporting Frequency
During any period of time when the Grantee is subject to the requirement in paragraph 1 of this award term and condition, the Grantee must report proceedings information through SAM for the most recent five-year period, either to report new information about any proceeding(s) that the Grantee has not reported previously or affirm that there is no new information to report. If the Grantee has Federal contract, grant, and cooperative agreement awards with a cumulative total value greater than $10,000,000, the Grantee must disclose semiannually any information about the criminal, civil, and administrative proceedings.

5. Definitions
For purposes of this award term and condition:

a. Administrative proceeding means a non-judicial process that is adjudicatory in nature in order to make a determination of fault or liability (e.g., Securities and Exchange Commission Administrative proceedings, Civilian Board of Contract Appeals proceedings, and Armed Services Board of Contract Appeals proceedings). This includes proceedings at the Federal and State level but only in connection with performance of a Federal contract or grant. It does not include audits, site visits, corrective plans, or inspection of deliverables.

b. Conviction, for purposes of this award term and condition, means a judgment or conviction of a criminal offense by any court of competent jurisdiction, whether entered upon a verdict or a plea, and includes a conviction entered upon a plea of nolo contendere.

c. Total value of currently active grants, cooperative agreements, and procurement contracts includes—

(1) Only the Federal share of the funding under any Federal award with a cost share or match requirement; and

(2) The value of all expected funding increments under a Federal award and options, even if not yet exercised.
APPENDIX 5 – Specific Award Conditions

NONE.
APPENDIX 6 – Conflict of Interest Requirements

1. Conflicts Subject to Procurement Regulations. When procuring property or services, the grantee and its subrecipients shall comply with the applicable conflict-of-interest rules in 2 CFR 200.317 and 2 CFR 200.318(c). In all cases not governed by 2 CFR 200.317 and 2 CFR 200.318(c), the Grantee and its subrecipients must follow the requirements contained in paragraphs 2-5 below.

2. General prohibition. No person who is an employee, agent, consultant, officer, or elected or appointed official of the Grantee or subrecipient and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have a financial interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or for one year thereafter. Immediate family ties include (whether by blood, marriage or adoption) the spouse, parent (including a stepparent), child (including a stepchild), sibling (including a stepsibling), grandparent, grandchild, and in-laws of a covered person.

3. Exceptions. HUD may grant an exception to the general prohibition in paragraph (ii) upon the Grantee’s written request and satisfaction of the threshold requirements in paragraph (iv), if HUD determines the exception will further the Federal purpose of the award and the effective and efficient administration of the Grantee’s Project, taking into account the cumulative effects of the factors in paragraph (v).

4. Threshold requirements for exceptions. HUD will consider an exception only after the Grantee has provided the following documentation:

   a. A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how that disclosure was made; and

   b. An opinion of the Grantee's attorney that the interest for which the exception is sought would not violate state or local law.

5. Factors to be considered for exceptions. In determining whether to grant a requested exception after the Grantee has satisfactorily met the threshold requirements in paragraph (iii), HUD will consider the cumulative effect of the following factors, where applicable:

   a. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

   b. Whether an opportunity was provided for open competitive bidding or negotiation;

   c. Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception
will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

d. Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process regarding the assisted activity in question;

e. Whether the interest or benefit was present before the affected person was in a position as described in paragraph (ii);

f. Whether undue hardship will result either to the Grantee or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

g. Any other relevant considerations.

6. Disclosure of potential conflicts of interest. The Grantee must disclose in writing to HUD any potential conflict of interest.
APPENDIX 7 – Award Term and Condition Regarding Trafficking in Persons

The following award term and condition, which is required by 2 CFR part 175, applies as written:

a. Provisions applicable to a grantee that is a private entity.

1. You as the grantee, your employees, subrecipients under this award, and subrecipients’ employees may not—

   i. Engage in severe forms of trafficking in persons during the period of time that the award is in effect;

   ii. Procure a commercial sex act during the period of time that the award is in effect; or

   iii. Use forced labor in the performance of the award or subawards under the award.

2. We as the Federal awarding agency may unilaterally terminate this award, without penalty, if you or a subrecipient that is a private entity:

   i. Is determined to have violated a prohibition in paragraph a.1 of this award term; or

   ii. Has an employee who is determined by the agency official authorized to terminate the award to have violated a prohibition in paragraph a.1 of this award term through conduct that is either—

   A. Associated with performance under this award; or

   B. Imputed to you or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR Part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by HUD at 2 CFR 2424.

b. Provision applicable to a grantee other than a private entity.

We as the Federal awarding agency may unilaterally terminate this award, without penalty, if a subrecipient that is a private entity—

1. Is determined to have violated an applicable prohibition in paragraph a.1 of this award term; or

2. Has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in paragraph a.1 of this award term through conduct that is either:
i. Associated with performance under this award; or

ii. Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by HUD at 2 CFR 2424.

c. Provisions applicable to any grantee.

1. You must inform us immediately of any information you receive from any source alleging a violation of a prohibition in paragraph a.1 of this award term.

2. Our right to terminate unilaterally that is described in paragraph a.2 or b of this section:

   i. Implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and

   ii. Is in addition to all other remedies for noncompliance that are available to us under this award.

3. You must include the requirements of paragraph a.1 of this award term in any subaward you make to a private entity.

d. Definitions. For purposes of this award term:

1. “Employee” means either:

   i. An individual employed by you or a subrecipient who is engaged in the performance of the project or program under this award; or

   ii. Another person engaged in the performance of the project or program under this award and not compensated by you including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.

2. “Forced labor” means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
3. “Private entity”: 
   
   i. Means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25.

   ii. Includes:

       A. A nonprofit organization, including any nonprofit institution of higher education, hospital, or tribal organization other than one included in the definition of Indian tribe at 2 CFR 175.25(b).

       B. A for-profit organization.

4. “Severe forms of trafficking in persons,” “commercial sex act,” and “coercion” have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).