

## 2024 CAPER Narratives

### CR-05 - Goals and Outcomes

#### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

CDBG Program Year Expenditures by Goals for Tables 1 and 2:

(See Attached PR 26 Financial Summary, PR 05 Drawdown Report by Project, and Activity)

Tables 1 and 2 in IDIS CR-05 do not auto-fill data for Funding expenditures for the Program Year or for the Strategic Plan to date and we cannot add data to the Tables in IDIS. We have provided that information in this narrative section based on data from PR 26 and PR 05.

#### Table 1: Expenditures for Program Year 2024

Goal 1: Housing **2024:** \$24,791.14, **2023:** \$27,796.00 **2022:** \$60.00 = Total: \$52,647.14

Code Enforcement **2024:** \$156,260.88 = Total: \$156,260.88

Goal 2: Public Services **2024:** \$122,177.06, **2022:** \$1,154.70, **2020:** \$1,656.78 = Total: \$124,988.54

Goal 3: Public Facilities **2024:** \$13,716.06, **2023:** \$17,168.40, **2021:** \$30,006.12, = Total: \$60,890.58

Goal 4: Econ Development **2024:** \$65,000, **2023:** \$224,312.60, **2022:** \$243,456.33, **2021:** \$61,762.88, **2019:** = Total: \$594,621.81

Goal 5: Admin/Planning **2024:** \$242,931.23 = Total: \$242,931.23

Total Expenditures 2024: **\$1,232,340.18**

#### Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/ outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Assure access to services for targeted populations	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	1835				
Assure access to services for targeted populations	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	75437		58720	53340	90.84%
Assure access to services for targeted populations	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	148			51	
Assure access to services for targeted populations	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Develop economy and employment	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	3575		0	3575	

Develop economy and employment	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	6		3	1	33.33%
Develop economy and employment	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	0	32		20	5	25.00%
Develop economy and employment	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	127		38	41	107.89%
Improve/develop infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	406821		42590	12635	29.67%
Improve/develop infrastructure	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Increase supply of standard affordable housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit		18		10	3	30.00%
Increase supply of standard affordable housing	Affordable Housing	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	0	0		1	0	0.00%
Provide strong program planning and administration	Administration	CDBG: \$	Other	Other	0	1		53000	53000	100.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

West Allis's #1 and #2 goals are to redevelop abandoned/underutilized industrial sites by removing barriers to sustainable development and planning for improved neighborhoods and eliminate slum and blighting influences. In 2024, work continued on the construction of a new 247-unit apartment housing project in partnership with 3 Leaf Partners on the site of the former Clark Oil Headquarters with the grand opening in quarter three of 2025. Staff also worked to address several ideal and abandoned commercial properties located throughout the City. One site in particular, a former commercial space, Czars Bar, is being converted into single family housing where the site will provide 2 units, as a spot blight activity. The Housing Rehabilitation Team is looking to leverage the HOME funds from Milwaukee County to address the poor condition of the property. Additionally, Commercial Façade projects included for fiscal year 2024 included Emerald an event space in the city providing, which also provides catering services to the community and Caufield's a wine bar and eatery offering West Allis residents wine from small producers.

Much of 2024 was community planning for additional housing opportunities within the city. The team explored and continues to encourage developers to consider HOME, project-based vouchers, or tax credit housing into their visioning for West Allis opportunities. The city continues to explore the utilization of CDBG dollars on the "block" level through the funding of potential neighborhood groups, direct neighborhood improvements (i.e., connections, parks, employment opportunities) and community building within the City's LMA's.

In 2024, the city began the demolition and new construction of an aging park pavilion built in 1937 and a construction of a new neighborhood park pavilion for the neighborhood. Liberty Heights Park Pavilion project design and budget have been solidified, and completion of construction is scheduled to be complete June 1, 2025.

West Allis's #3 and #6 goals are to address the needs of low-moderate income neighborhoods by reducing crime through awareness programs, planning for improved neighborhoods, improving the conditions of neighborhood parks, and improving and developing the infrastructure for public facilities, and delivery and provision for providing social services or outreach programs. Activities such as Community Service Officer, Graffiti Removal and Gang Prevention allowed for additional public safety resources that would not otherwise be available to LMI neighborhoods without the use of CDBG funds. The Family Resource Center provided child daycare and structured workshop/activity services to 186 individuals. The Frail Elderly Home Service/Neighborhood Outreach Program (Eras-Senior Network) activity provided services to 314 older adults, allowing them to remain at home through services such as one-way rides, home chores/repairs, in-person visits, shopping trips, etc. The Police Department was also able to provide domestic violence, through an online format, support services to 28 adults and 36 children in 2024 through WISH, a public service program assistance participant who are or have faced domestic violence. Additionally, the City funded W RTP/Big Step assisting 22 LMI individuals who are unemployed or

underemployed with job search assistance.

**CR-10 - Racial and Ethnic composition of families assisted****Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)**

	<b>CDBG</b>
White	537
Black or African American	77
Asian	9
American Indian or American Native	2
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>625</b>
Hispanic	0
Not Hispanic	625

**Table 2 – Table of assistance to racial and ethnic populations by source of funds****Narrative**

All racial and ethnic beneficiary data is collected from self-certification forms for LMC or LMH activities and applications for LMC or LMH activities. These numbers are a compilation of individuals and households.

This CR-10 Table does not include choices for all of the Races entered into the LMC, LMH and LMJ Activity Setups for 2024 Activities. Therefore, we are reporting in the Narrative the information for those races not included in the Table but were recorded as beneficiaries in 2024 activities. The Hispanic/Not Hispanic data is for all of the beneficiaries (742) reported on in CR-10.

Other - 117

The income level of beneficiaries reported in LMC, LMJ, and LMH activities for 2024:

Extremely Low 392

Low 205

Moderate 136

Non-LMI 9

742

**CR-15 - Resources and Investments 91.520(a)****Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,586,696	1,232,340

**Table 3 - Resources Made Available****Narrative**

CDBG Program Year Expenditures by Goals for Tables 1 and 2:

(See Attached PR 26 Financial Summary, PR 05 Drawdown Report by Project, Activity)

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**Table 2: Expenditures Strategic Plan to Date**

Goal 1: Housing **\$ 549,562.58**

Goal 2: Public Services **\$ 817,714.02**

Goal 3: Public Facilities **\$ 1,940,514.15**

Goal 4: Economic Development **\$ 1,228,503.91**

Goal 5: Admin/Planning **\$ 1,039,216.64**

**2024 Expenditures by Projects:**

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**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of West Allis	100	100	Jurisdiction

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

West Allis has an established geographic area where 51% of the population is composed of LMI individuals, identified as the "planned geographic distribution" of CDBG investments. Several activities cover this large geographic area with 45,960 people being beneficiaries, including: Graffiti Removal, Gang Prevention, Tree & Shrub Beautification, and Code Enforcement. Other LMA activities cover smaller areas with only a few block groups being served. Several other activities benefitted LMC clientele, all West Allis residents.



## **Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City worked to address the blight or aging of commercial properties at various locations in the city.

**CR-20 - Affordable Housing 91.520(b)**

**Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 5 – Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	7
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>7</b>

**Table 6 – Number of Households Supported**

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

Goals were identified in 2024 AAP. In 2024, no new affordable single-family homes were completed or sold by year's end with HOME funds. However, prior year funds were utilized to rehab a total of (7) single family homes and 2024 Single Family Rehab funds were not fully utilized due to funds being approved late in 2024 and delays during the bidding process of contractors. Not having the funds in time for construction/home rehab season results in delayed results. Further, supply chain issues continue to impact the completion of projects or inflation has severely impacted project budgets. In addition, several more applications were received, but did not meet the City's underwriting criteria. West Allis advertises our housing rehab loan program to include loans for "architectural barrier" removal for persons with disabilities. Applications for this type of rehab loan are minimal.

**Discuss how these outcomes will impact future annual action plans.**

Past and present accomplishments will determine if future goals should be adjusted. If demand seems to continually decrease, goals will be reduced, or vice versa.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	392	0
Low-income	205	0
Moderate-income	145	0
<b>Total</b>	<b>742</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

There were 11 non-moderate-income households assisted in 2024. That would bring the total assisted to 742 households.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The City of West Allis was the first PHA in the Milwaukee-Waukesha MSA and possibly the first in the State to establish a preference for "homelessness" households applying for our HCV wait list. This preference was established in 2013 and has been in place for three openings of our HCV waitlist (2013 and 2015 and 2021). In 2024, our PHA anticipates Open Enrollment will not occur in 2025 due to the Annual Budget Authority being at levels indicated pulling from the PHA waitlist ceased in Q2 of 2024. The waitlist is purged every 12 months to ensure current waitlist families remain eligible, but no new households will be added to the waitlist until the PHA conducts its next Open Enrollment process.

West Allis works with Milwaukee County Homeless Outreach and has formed a collaboration with the FIRE and Police Departments to address homeless issues as well as relationships with community groups to work together to meet individual needs (food pantries, street angles, etc.) Additionally, the City of West Allis administers one of the largest HUD-VASH programs in the State of WI through which 133 former homeless Veterans have been able to identify safe, decent, and affordable housing in West Allis. Furthermore, West Allis maintains two active Homeless Management Information System (HMIS) user licenses and voluntarily enters our allocation of VASH Vouchers in the HMIS.

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

West Allis, as a member of the Milwaukee City/County Continuum of Care, participated in the development, implementation, and progress of the adopted CoC 10-Year Plan to End Homelessness, which can be found at: [www.milwaukeeecoc.org](http://www.milwaukeeecoc.org). The CoC Board meets quarterly to review member agencies' progress towards accomplishing the stated goals of the 10-Year Plan. The CoC operates a Housing First model of care and continues to expand Coordinated Entry throughout the continuum. This is in addition to the City's ongoing participation in the bi-annual Point in Time Count.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

West Allis does not have the organizational structure, being a city of 60,000, to target, monitor, nor run programs for homelessness. West Allis relies on partnerships with the CoC and Milwaukee County to direct those in need of services that are unable to be provided by West Allis staff. On the other hand, staff provides consultation to inquire individuals on how to access and apply for, and whom to contact for these services. Staff also have ties to the West Allis-West Milwaukee school district and Southwest Suburban Health Department, which consists of West Allis and Greenfield public health staff, to assist homeless

prevention and directs families to these contacts when necessary.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

As a member of the local Continuum of Care (CoC) Board of Directors, a City of West Allis Mayoral appointee participates in and influences many of the decisions related to ending homelessness across all demographics in Milwaukee County. Additionally, the City of West Allis actively enters both our own allocation of Veterans Administration Supportive Housing (VASH) Vouchers in the Homeless Management and Information Systems (HMIS) database to assist with identifying trends and ensuring that the needs of Veterans are met. The City of West Allis is also actively represented as a member of the State of Wisconsin HMIS Advisory Board.

The City of West Allis was the first large PHA in Wisconsin that has a “homeless” preference for Housing Choice Voucher (HCV) applicants. This preference was introduced prior to the opening of our 2013, 2015, 2021 waitlists-and in the most recent Open Enrollment session for the city introduced the continuously open (CoC) referral waiting list. The City of West Allis’ active utilizes a homeless preference coupled with an active use of the HMIS database better ensures that we are able to identify and house homeless families. Furthermore, the City of West Allis actively works with the Milwaukee County Housing Division to ensure that families are connected with the appropriate social services with housing being identified as the most pressing need.

While these families may not “lease up” in the City of West Allis many do access safe, decent, and affordable housing along with access to the resources necessary to maintain it. In 2024, the City of West Allis was able to house 51 individuals presented as homeless or with a history of homelessness. To ensure that families can find available housing options, a computer kiosk is maintained in the Housing offices that assist families search for units online. Landlords also list available units both in the City’s Housing Office and on the City of West Allis website.

**CR-30 - Public Housing 91.220(h); 91.320(j)****Actions taken to address the needs of public housing**

West Allis does not have any public housing, however the Community Development Authority of the City of West Allis acts as the PHA and has approval of 638 Housing Choice Vouchers, of which 172 are VASH for homeless veterans. Through the administration of these 638 HCVs, West Allis addresses as many low-income housing needs as possible with the limited number of vouchers that have been awarded by HUD, by offering rent assistance to up to 638 individuals. The rent assistance program provides a subsidy, based on the household's income, that helps pay a household's rent. The City of West Allis also is part owner of a 104-unit affordable housing development that provides housing to seniors.

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

The Community Development Authority of the City of West Allis oversees the Residential Advisory Board (RAB) which consists of 7 board members who are all participants in the CDA's Section 8 Housing Choice Voucher program. The RAB's role is to assist the CDA and make recommendations to the CDA in developing the PHA Five-Year Plan, PHA Annual Plan, the Housing Choice Voucher Administrative Plan, and to provide representation that is meaningful and relevant to the development/modifications to the PHA Plans and the HCV Administrative Plan.

**Actions taken to provide assistance to troubled PHAs**

The Community Development Authority of the City of West Allis (the PHA) is in good standing with HUD and is not a troubled PHA and rated as a high performer.

### **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

West Allis's zoning code was updated in 2022 and as part the flexibility it provides allows added density in the form of a range of housing types ranging from low density to multi-unit development. For example, the code was reformed to allow duplexes in areas previously only allowing single-unit development. The code was also reformed to allow maximum based parking limits with the notion of converting unneeded parking to developable land areas (value added). West Allis's fees and charges are comparable to surrounding communities. West Allis is a completely-built-out community, so there are no growth limitations, and the city encourages more density, adaptive reuse of older buildings, or redevelopment of older sites. The city has 20 Tax Increment Finance Districts, of which some are home to affordable housing developments. The City utilizes a portion of its HOME funds to construct new affordable single family lots on 30 by 120 ft. lots. Zero new homes were completed and sold in 2024, but the city is exploring a partnership with Habitat for Humanity-Milwaukee that could result in the purchase of vacant lots to build affordable single-dwelling unit homes.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

West Allis provides funding to various Public Services activities which address obstacles to meeting underserved needs. The Frail Elderly Home Services – West Central Interfaith program provided outreach services to 314 elderly individuals, of which over 82% were either low-income or extremely low-income. These individuals received services such as referrals, advocacy, and transportation to grocery shopping, home chore/repair assistance, etc. The WISH activity (domestic violence support group) provided support to 28 adults and 36 children underserved beneficiaries who were in need of supportive services during a very difficult time in their lives (94% LMI). The Family Resource Center activity provided structured workshops, playgroup activities, and resource/referral services to a total of 186 (92% LMI) individuals in 2024. The program opted to expand their service reach by offering virtual meeting and has seen a 60% increase in, online participation of families increased for the past three years.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

Upon initial inspection for homebuyer and rehabilitation loan programs, all deteriorated paint surfaces are identified as lead hazards. Correction of any identified lead hazards is incorporated in the scope of work and correction of these hazards is a mandatory part of these programs. The City of West Allis verifies that all contractors working with our rehabilitation loan program have a current Lead Company certification, as required by state law. If lead abatement is required, lead abatement certification must be submitted prior to contracts being signed. The health department performs lead and dust clearance testing after completion of any work disturbing a painted surface. Staff provides all applicants for assistance the standard lead notifications depending on the scope of the project.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

WWBIC micro-enterprise assistance, which provided technical assistance to owners of and persons

developing micro-enterprise businesses. This program provided skills training to 39 individuals who own or want to own a small business, allowing them the sufficient skills needed to produce cash flow for their business, avoiding financial crises and possibly increase one's income. West Allis continued with its housing rehab loan program, providing low-interest or zero interest loans to low- and moderate-income homeowners. This program allows household members to remain in their homes by providing financial assistance for necessary home repairs. The program offers loans at rates lower than the private sector and prevents low-income households from living in substandard conditions.

West Allis also continued with its economic development loan program, requiring new job creation for low-moderate income individuals, providing job opportunities to households who may be at a poverty-level prior to their new job hiring. Businesses assisted with fiscal year 2024 economic development loan funds include Soap Passion producing bath and beauty products, All Goods a clothing store selling modern and vintage clothing, and Bars & Recreation an entertainment venue that will convert a former foundry facility into a commercial community space offering sporting activities, events, and food & beverages. Finally, there have been several Economic Development loans in 2024, but the city is awaiting for the loans to close.

#### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The City of West Allis needs a strong, well-defined civic infrastructure in order to effectively plan for its future and to successfully implement community plans. Civic infrastructure can be defined as the capacity of the public, private, and non-profit sectors to sacrifice self-interest and work towards a common goal of improving the community. In order to establish a strong, well-designed, and well-developed infrastructure, it must be recognized that the City government, nor CDBG funds alone cannot resolve all problems or provide all economic and social opportunities to reach the desired goals of the Annual or Consolidated Action Plan. Coalitions, partnerships, and networks that facilitate the exchange of information and ideas must be enhanced or formed among all sectors of the community.

The CDBG Program for the City of West Allis is administered through the Planning and Zoning Program. The goal of the city is to form a strong, well-defined civic infrastructure. A 2024 underway activity includes Rodgers Park ADA upgrades. The design of the project to complete an ADA path was completed in the fourth quarter of the operation year, with the bidding process occurring in March or April of 2025. Construction is anticipated to begin in May 2025 to upgrade playground surfaces and features of play equipment already located at the park. In addition, another 2024 project includes the purchase of a synthetic ice skating rink to be placed at Liberty Heights Park. The ice rink is both cost efficient and environmentally friendly. It avoids the high cost of natural ice maintenance, is affordable to install, and reduces the need for water and energy-intensive refrigeration. An RFP, released in the third quarter of the year, yielded two major vendors. Purchase and installation is anticipated in the third quarter of 2025.

#### **Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

West Allis participated in webinars or virtual conferences on housing, planning, development, or other programs related to the strategies of the City's CDBG Consolidated Plan. During 2024, the City worked with Milwaukee County on addressing the issues of homelessness in West Allis by building collaboration efforts



with the West Allis Fire, Police, and Health Dept. West Allis also continues a strong and open relationship with several local social service agencies, such as Family Resource Center, WWBIC and ERAs, all of whom are funded by West Allis CDBG funds under public service and economic development activities. This continuous effort is also part of the Housing Department's- Housing Choice Voucher Family Self-Sufficiency Program. Throughout 2024, the city supported efforts of KIVA by providing matching grant assistance for individuals to help grow or expand businesses with a total of 12 KIVA loans by West Allis business owners.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The Milwaukee HOME Consortium completed an analysis of impediments (AI), which guides Fair Housing activities and anti-homelessness strategies. West Allis is currently a participant in the Regional AI (or version of) with Milwaukee County, the City of Milwaukee, the City of Wauwatosa and Waukesha County. The City of Milwaukee Grants Administration was the lead agency for the AI. Through recommendations in addressing the impediments to Fair Housing. West Allis is planning to effectively address several of these recommendations through use of the CDBG, Section 8 and VASH Vouchers, and HOME funds.

In 2024 the City of West Allis actions taken to ensure measures of Fair Housing were implemented include providing Housing Choice Vouchers Program participants with resources to Rent Smart, a free online renter readiness training course which is a continual part of the briefing interview for the program. Create payment plans between Section 8 tenants and landlords preventing instances of eviction or covering damage mitigation fees. In addition, the HCV-Family Self Sufficiency Program partnered with Community Advocates, a non-profit organization, to provide credit rebuilding courses for participants through its Family Self-Sufficiency Program. Finally, the Section 8 staff provide training on Fair Housing at the annual Landlord Symposium hosted by City's Police Department, which is an annual partnership.

Given the complexity of affirmatively furthering fair housing choice, outside factors affecting the Collaborative members' staff workload, and resource limitations facing the Collaborative members, AREA, Inc., and members of the Collaborative have identified several key recommendations for initial priority actions that will help establish a framework for full implementation over time.

These recommendations are:

- Develop benchmarks for creating a regional fair and affordable housing strategy.
- Address the housing, jobs, transit mismatch.
- Increase the public's understanding of fair housing and interaction with diverse groups.

On at least an annual basis, the members of the Collaborative will report their progress in implementing these and other recommendations found in Section XI. The members of the Collaborative have developed a detailed dashboard, which will be established on a shared, online platform to enable the Collaborative to coordinate and implement actions efficiently to address each impediment. The dashboard that was developed by a consultant to several members of the Collaborative will enable each Collaborative member to track its individual progress as well as the group's overall progress.

#### **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

West Allis has developed and implemented a system for monitoring the expenditure of CDBG and HOME funds and to ensure attainment of its CDBG and HOME program objectives. It has also developed an annual monitoring strategy for managing all activities, and those organizations which deliver them to the city. All non-governmental Community Development Block Grant (CDBG) sub recipients sign sub grantee agreements, and all governmental CDBG sub recipients sign intergovernmental agreements that enumerate program requirements. Monitoring consists of both desk and on-site reviews. On-site reviews consist of periodic site visits which will include an in-depth review of agency, project, and client files.

Desk monitoring takes place twice a year, when all sub recipients are required to submit a semi-annual report to staff in July, and an annual report in January. Findings of non-compliance are followed through to resolution, and a sub recipient's performance record enters into subsequent funding determinations. The city monitors its own performance through Development Department and Finance Department staff, including the timeliness of project implementation to ensure compliance with HUD's timeliness standards.

##### **Monitoring Activity**

- Establish proper monitoring and oversight for all sub recipients, community housing development organizations, developers, and contractors
- Ensure that the activities funded are in compliance with the program regulations
- Ensure timeliness of the projects and expenditure of funds
- Ensure that Master File Checklists and Financial Checklists are complete and accurate
- Ensure that partners have implemented proper file and record keeping procedures
- Ensure that partners have established systems for obtaining documentation of required reporting elements
- Ensure long term compliance with sub recipient, community housing development organization, developer and contractor agreements and/or loan commitment agreements.

#### **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

In 2024, steps utilizing the HUD conditional waivers were utilized that permitted online postings and virtual public participation. Staff followed the general steps: (1) publication in City's official newspaper, emails to CDBG "solicitation" list, posting in City buildings, and posting on City website seeking public comment and ideas in developing goals and projects for the next year's funding; (2) hold public comment meeting; (3) publication in City's official newspaper, emails to CDBG "solicitation" list, posting in City buildings, and posting on City website that the City is accepting/soliciting for applications for the next year's funding; (4)

public hearing at Block Grant Committee meeting to consider all proposals submitted for the next year's Annual Action Plan( conducted virtually during a Teams Common Council meeting, broadcasted on YouTube as well; (5) review/approval of Annual Action Plan by Common Council; (6) notice of making the Annual Action Plan available for review and public comment; (7) notice to public of a Finding of No Significant Impact on the Environment.

No Public Comments were received.

Staff followed general steps necessary to solicit comments on the 2024 Consolidated Annual Performance and Evaluation Report (CAPER) including posting of CAPER results on City website seeking public comments for a total of 15-days beginning March 14, 2025 through March 28, 2025, notices of that posting, notices of date and location of public comment meeting. No Public Comments were received during this time frame.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The has been no change in the jurisdiction or program objectives where CDBG funds can be used. The city also has alignment with the three objectives of the program through projects and activities: benefiting low-moderate income individuals, eliminating slum or blight, and addressing urgent needs in communities.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

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The has been no change in the jurisdiction or program objectives where CDBG funds can be used. The city also has alignment with the three objectives of the program through projects and activities: benefiting low-moderate income individuals, eliminating slum or blight, and addressing urgent needs in communities.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

**CR-58 – Section 3**

**Identify the number of individuals assisted and the types of assistance provided**

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

**Table 8 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					

Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

**Table 9 – Qualitative Efforts - Number of Activities by Program**

### **Narrative**

Davis- Bacon Compliance/Section 3: The Community Development Division oversees the enforcement of Federal labor standards, including prevailing wage rates. The city provides technical assistance to local contracting agencies through monitoring and oversight of HUD approved projects. Section 3 requirements are incorporated into bidding advertisement, bidding documents, and contracts, and are required to be submitted to the City prior to work commencing. Minority, Women, and Disabled Persons in Business: Through the bidding process, the City strongly encourages expanded opportunities for MBE/WBE/DBE businesses. BIDs are forwarded to the WEDC Department of Minority Businesses and the City forwards BIDS requests to organizations representing various ethnic groups. In the advertising documents, MBE/WBE/DBE businesses are encouraged to bid on a project.