

Name of Exhibit:
**Narrative Exhibit I:
Soundness of Approach**

Applicant:
City of Milwaukee

Name of File:
NarrativeExhISoundnessOfApproach

EXHIBIT I: SOUNDNESS OF APPROACH

I.1 Planning Process

The Principal Team Members have encouraged and welcomed the active involvement of public housing and community residents, neighbors, businesses, elected officials, community and faith-based organizations, HUD and other stakeholders in the planning and execution of all its redevelopment plans, and Westlawn is no exception. Over the last several years, no fewer than 44 meetings with residents and community/business leaders have been held as part of the planning process, which led to the preparation of two previous HOPE VI applications, and two CNI applications in 2012 and 2013. With input received through this extensive outreach and collaborative planning process, including the constructive criticism of HUD reviewers, the transformation plan for the Westlawn neighborhood has continually improved.

Although the redevelopment of Westlawn had been a priority for a number of years, it was the 2010 HOPE VI grant opportunity that catalyzed an intensive, comprehensive planning effort to revitalize the Westlawn community. The design firm Torti Gallas was retained by HACM to engage residents through design charrettes and community meetings. Architectural drawings and models were created to illustrate various options and plans. The architects listened to residents' ideas and suggestions, and in many cases used those ideas to help shape the ultimate plan. Many comments from residents and other stakeholders directly impacted the Westlawn master plan. For example, the decision to designate one of the midrises for seniors, the decision to add child play areas to the linear park by Lincoln Creek, and the decision to add community gardens for the neighborhood came directly from resident recommendations.

Although the HOPE VI application was not funded, HACM and its partners moved forward, continued to refine the plan, and began neighborhood transformation by using tax credits to demolish, redesign and rebuild the eastern portion of the Westlawn housing development, now called Westlawn

Gardens. The Choice Neighborhoods grant will provide the catalyst to realize the full effect of neighborhood revitalization by completing the next phase of Westlawn: the redevelopment of the western section of the site. Outreach for all public and resident meetings has been inclusive and comprehensive. Notices and invitations were posted in a publication, *The Daily Reporter*, and were sent to all residents, as well as to elected officials, social service providers, community organizations and businesses. During the planning process for the 2012 and 2013 CNI applications, a total of 8 meetings were held to offer partners, stakeholders, Westlawn and neighborhood residents a chance to obtain information on the plans and to offer input, including: (1) 2/8/2012 meeting of neighborhood stakeholders; (2) 2/27/12 public meeting; (3) 3/21/12 public meeting; (4) 3/26/12 meeting with Westlawn residents; (5) 6/17/2013 public meeting; (6) 7/22/13 meeting with Westlawn residents (attendance = 112); (7) 8/13/13 public meeting (attendance = 89); and (8) 8/21/13 public meeting (attendance = 28). In 2014, three additional meetings were held to explain the Westlawn transformation plan and to allow the public, stakeholders and residents to provide input into the plan. Two public meetings were held on January 13, 2015 at the Silver Spring Neighborhood Center (attendance = 47) and on January 14, 2015 in conjunction with the HACM monthly Board of Commissioners meeting. The general public and all Westlawn residents were invited to these meetings, as were other concerned stakeholders, including local business leaders through the Havenwoods EDC, the Silver Spring Neighborhood Center, Growing Power, University of Wisconsin-Milwaukee, and Milwaukee Public Schools. In addition, a meeting with Westlawn residents was held on January 26, 2015 (attendance = 44). Among the topics discussed at all meetings were: the CNI planning and implementation process; the proposed physical plan; planned supportive service activities; other proposed transformation activities; relocation issues; reoccupancy plans and policies; and Section 3 and other employment opportunities. All sessions and meetings were held in facilities that are physically accessible to persons with disabilities. All notices of and communications

during all training sessions and public meetings were provided in an effective manner for persons with hearing, visual, and other communication-related disabilities. Flyers and materials were available in Spanish in order to engage those who have limited English proficiency. All public/resident meetings allowed for questions and answers and input and feedback from residents regarding the plans. Residents were extremely supportive of the proposed overall plan and offered detailed suggestions for the proposed units. One resident stated her preference that she would like to have screen doors on the units and another stated they preferred hard wood floors to carpeting. Staff explained that it has been a challenge finding a screen door that is within cost limits but sturdy enough to last, but that the design team would continue looking for an appropriate cost-effective, durable screen door. Regarding wood floors, HACM is looking at the possibility of designing some of the homes as *healthy homes*, without carpeting, which was done on one block of Westlawn Gardens. Finally, a resident asked if emergency pull cords could be installed in all accessible units, not just in midrises, and HACM will pursue incorporating that feature into the design. One of the most significant issues brought up by participants had to do with income eligibility for the new units and the concern that some households might be over-income to qualify. As public housing has higher income limits (80% AMI) than Section 8 (50% AMI) or LIHTC (60% AMI), HACM responded to the concern by including 40 public housing-only units in the plan to accommodate families that were over-income for the other programs. From the charrette process that resulted in the Westlawn Master Plan through the most recent CNI planning process, these examples illustrate how the Principal Team Members have gone beyond just providing information on the elements of the plan by incorporating resident and other stakeholders ideas and recommendations into the actual plan.

I.2 Community Engagement

From the very beginning and throughout the planning process, HACM has been inclusive of both Westlawn and neighborhood residents, including all in the charette process for the original

Master Plan and providing education and information about all elements of the Transformation Plan as it has improved. Through our iterative process, we will leverage the opportunities that are embodied in our mutual vision. By holding our partners and ourselves accountable through the long-term, the Westlawn neighborhood will be transformed to a community that stimulates economic and human growth. Through expanding our established and proven engagement mechanisms as described in the following paragraphs, our partnerships will eventually dissolve artificial barriers and strengthen the links between Westlawn and the broader community. Our demonstrated accomplishments in building consensus, evaluating and refining our decision making processes and fine-tuning the redevelopment plans will ensure success.

Looking forward, the City of Milwaukee, HACM and the other Principal Team members intend to continue to engage the residents in several ways: (1) Including resident leaders and neighborhood representatives on the implementation subcommittees that will be led by the Principal Implementation Partners in the areas of Housing, People, Neighborhood, and Education (see Section I.5) so that feedback and input of residents is part of the process; (2) Continuing to keep Westlawn residents informed and solicit feedback at the monthly meetings of the Westlawn Resident Council by providing regular updates on activities; (3) Working with the Havenwoods Economic Development Corporation and with the local Alderperson and other City leaders to outreach to the rest of the neighborhood through information sessions for general residents of the Westlawn Choice Neighborhood; and (4) Working with Westlawn and neighborhood residents through Neighborhood Watch activities, part of our public safety strategy to better coordinate efforts with residents of Westlawn and the surrounding neighborhood.

HACM and its Principal Team members and other partners will continue to work closely to build capacity among the neighborhood residents, especially but not limited to the residents of Westlawn itself. In September 2012, nearly 200 volunteers from Westlawn and the neighborhood

took part in transforming an empty lot in the Westlawn neighborhood into a multigenerational KaBOOM! playground. Residents spent two months planning for the event, working to obtain commitments from local donors of cash and food to support the project as well as engaging volunteers to come out on a Saturday to make the playground a reality. At its conclusion, the KaBOOM! playground build not only provided a place for all neighborhood kids to play safely, but it also helped build capacity among resident leaders on how to plan and implement a project to better their neighborhood. HACM will continue to actively engage the residents in various elements and activities related to the Transformation Plan, including: (1) facilitating additional project-based capacity-building activities like KaBOOM!; (2) Implementing activities related to the community gardens and leveraging the positive impact of Growing Power by creating a farmers market and associated entrepreneurial activities such as small food retailers in the new grocery store/public market described in the Exhibit F.2; (3) Providing advanced leadership training for participants from the project-based activities; and (4) Leading training sessions for residents serving on CNI Subcommittees on topics such as Program Evaluation and CNI best practices.

The implementation of the Transformation Plan will be a learning experience not only for residents, but also for the City, HACM, the Principal Team members, and our other partners. Through the life of the grant, we will continue to seek additional evidence-based strategies and/or national models that will assist us in achieving our overall goals, procuring additional resources to be deployed, and collecting other relevant information from conferences, articles, national groups, and word-of-mouth that will help us implement the Transformation Plan. As described in I.7, a formal evaluation process will also assist participants in analyzing the outcomes of the Transformation Plan.

I.3 Stakeholder Collaboration

The City of Milwaukee as lead applicant and HACM as co-applicant have reached out to a broad range of local government officials, members of community foundations and the business

community including the Greater Milwaukee Committee (GMC). Stakeholders have been actively exploring options to sustain and enhance neighborhood transformation efforts including engaging Purpose Built Communities to assist in the implementation of the Transformation Plan. We will use this model of a holistic approach by creating a dedicated team of like-minded civic leaders with a strong vision and strategy for success, and the ability to communicate and build consensus within the community. As described in I.5 below, Principal Team members will collaborate with key stakeholders through regular (quarterly) subcommittee meetings in the focus areas (Neighborhood, Housing, People, Education). Other key stakeholders who may not have the time to serve in a subcommittee role may assist in the evaluation and potential implementation and funding of a Westlawn Purpose Built Community model.

Besides the principal team members, other key stakeholders involved include:

1. Silver Spring Neighborhood Center (SSNC): A key asset to the neighborhood and for the entire northwest side of the city. The Executive Director has been part of all planning meetings and will continue to be involved on a regular basis, as SSNC will need to be part of the People, Education and Neighborhood subcommittees.
2. Carmen Northwest: The Principal, Dr. Patricia Hoben, has been briefed several times on the Westlawn Transformation plan, is eager to become part of a collaboration to improve the education pipeline (birth to college/career) for youth in the neighborhood, and the success of Carmen is a key part of our educational plan. Along with the other principals of MPS schools, she will serve on the Education subcommittee.
3. Havenwoods Economic Development Corporation: The Executive Director of the Havenwoods Economic Development Corporation and Business Investment District, Stephanie Harling, has been fully briefed on the Choice Neighborhoods opportunity and is a conduit of information and feedback both to and from the Havenwoods neighborhood and businesses.

Havenwoods focus area is from Sherman Boulevard to 76th and from Silver Spring Drive to Good Hope Road. About half of the Havenwoods target area (up to Mill Road) is located within the Westlawn Choice Neighborhood, thus sharing linkages and common assets. In coordination with the redevelopment efforts underway, the Havenwoods organization has worked with the City of Milwaukee and HACM to develop complementary approaches to curb appeal projects, economic development projects, crime prevention strategies and linkages between block club associations. Havenwoods will be key in helping to attract and improve the retail and other assets/resources in the community, including the planned grocery store and outreaching to local businesses for spaces in the planned public market, and Havenwoods will be a key partner in helping to sustain our economic development activities throughout and after the grant period.

4. UWM College of Nursing: As an Anchor Institution, and involved in the neighborhood for many years, UWM plays and will play a key role in assisting residents in managing chronic health conditions and in improving health in general for residents. The Dean and other instructors have been kept informed on the Transformation plan elements and have assisted in helping HACM draft the health-related People strategy. They will play a key role as part of the People subcommittee.

5. Growing Power: As an Anchor institution and playing a key role on the People subcommittee, Growing Power and their founder, Will Allen, have been involved at Westlawn since they started their farm five blocks from Westlawn in the early 1990s. The Principal Team members have had a number of meetings with Growing Power over the past four years to keep them updated on the Westlawn transformation plan and to determine Growing Power's role to help the residents at Westlawn learn more fresh food and healthy eating.

6. Milwaukee Area Workforce Investment Board: MAWIB was one of the city agencies, along with the Health Department and Department of City Development, that has been kept very informed about the Westlawn transformation plan. Because of the overall role it plays and the resources

available to it, MAWIB will play a key role in assisting with employment and self-sufficiency outcomes at Westlawn, and will serve as a member of the People subcommittee.

7. Milwaukee Health Services: As an FQHC near the Westlawn neighborhood, MHS serves as a health asset for residents of the northwest side of Milwaukee. Since 2013, MHS has been involved in the Westlawn transformation plan and will be a key health care partner and resource, including being part of the People subcommittee.

8. Wisconsin Women's Business Initiative Corporation (WWBIC): WWBIC has been a key partner and will be helpful in both the People strategy (financial literacy, asset building) and in the Neighborhood strategy (assisting with the revolving loan fund/helping to encourage new small business development in the neighborhood).

9. Greater Milwaukee Committee (GMC): The Greater Milwaukee Committee is a private - sector civic organization whose mission is to contribute to the cultural and economic base of the Milwaukee Metropolitan area. The organization was formed in the late 1940s and is comprised of leaders in business, the professions, labor, education and philanthropy, and nonprofit community development. The GMC has had meetings with the Mayor and other Principal Team members and is exploring the potential to become involved in establishing a Purpose Built Community model.

I.4 Anchor Institution Engagement

The following Anchor Institutions have been engaged with residents of the Westlawn neighborhood for some time. They each contribute in significant ways to the improvement of the human, social, cultural and economic well-being of the residents, and are committed to continue these efforts in the implementation of the Transformation Plan.

Growing Power is a nationally-renowned nonprofit organization and land trust which helps combat urban health problems such as obesity and diabetes by providing equal access to healthy, high-quality, safe and affordable food. Founder and urban farmer, Will Allen, received a MacArthur

“genius” award in 2008 to carry on his work and he has been recognized by First Lady Michelle Obama as one of the most influential leaders of the food security and urban farming movement. Growing Power provides hands-on training in setting up “community food systems” that help people grow, process, market and distribute food sustainably. Through a novel synthesis of various low-cost farming technologies -- such as the use of raised beds, aquaculture, vermiculture, and greenhouses heated through composting – Growing Power produces vast amounts of food year-round at its main two-acre farming site, located on West Silver Spring Drive, within the Westlawn Choice Neighborhood, and only five blocks from the Westlawn site. The Transformation Plan strategy includes Growing Power as a major partner to provide residents with information and education through after-school and job training programs, to expand a green waste/compost recycling program that is now in-place in the completed Westlawn Gardens revitalization to the proposed revitalization of the west side of the site, as well as to provide hands-on training in the new Westlawn community gardens to teach residents to “grow their own.” Due to its national and international influence, Growing Power is not only a local asset but also is an anchor institution.

University of Wisconsin-Milwaukee: The University of Wisconsin-Milwaukee (UWM) has a long history of assisting in community collaborations in other neighborhoods throughout Milwaukee. Since 1987, UWM College of Nursing has had a presence at Westlawn, through a collaboration with the on-site Silver Spring Neighborhood Center (SSNC). UWM provides primary care services including a walk-in clinic at SSNC that is open 50 hours per week. UWM has also expanded its efforts in the Westlawn neighborhood through their “Westlawn Partnership for a Healthier Environment”, a collaborative effort with more than 20 partners through a CARE (Community Action for a Renewed Environment) cooperative agreement with the U.S. EPA. This partnership has brought together community stakeholders to assess environmental health issues important to the Westlawn neighborhood, and is now working on improving environmental health

through assisting in the implementation of healthy homes and healthy childcare environments. UWM has been a significant partner in planning the overall Transformation Plan, in the topics of health and healthy neighborhoods. It has demonstrated its commitment to the Westlawn community and will continue to provide needed services in the implementation of the Transformation Plan.

Silver Spring Neighborhood Center: Throughout Milwaukee, there are many neighborhood entities that contribute immeasurably to community organization, improvement programs, local problem solving and a sense that “we’re all in this together.” The same holds true for the Westlawn target neighborhood, where the Silver Spring Neighborhood Center (SSNC) has been a stabilizing presence for Milwaukee’s northwest side and the Westlawn community for the past several decades. It was founded as a settlement house in 1958 to serve Westlawn families as well as the surrounding community. Since then, it has grown substantially in both programmatic scope and facility size (3,000 square feet to 50,000 square feet). It is prominently located in the center of the Westlawn site, where it provides an educational and service-rich hub for the neighborhood. The SSNC service model is comprehensive combining focused health and social services, recreation, early childhood education, after-school education and programming, adult education, employment and housing assistance, community organizing, emergency services, advocacy and other support services. SSNC has partnerships with over 50 agencies that bring both expertise and resources through SSNC to serve the Choice Neighborhood and other residents in need. SSNC is a trusted service provider entity and has been a fully engaged partner in the redevelopment of the eastern portion of Westlawn. SSNC will continue to offer its wide array of services, including its exceptional early childhood education program to Westlawn and Choice Neighborhood residents, and will be a critical piece of the cradle-to-career model in the Westlawn neighborhood. The leveraged financial commitments (Attachment 57) from these anchor institutions include \$52,500 from Growing Power, \$2,042,150 from UWM, and \$4,372,910 from Silver Spring Neighborhood Center.

I.5 Organization Framework for Implementation

Attachment 6 includes the partnership certification signed by executive officers of each entity that: describes the roles of each organization; demonstrates a commitment to work collaboratively throughout the grant period; and outlines the process for coordination, decision-making and dispute resolution. The City of Milwaukee as Lead Applicant, along with HACM as Co-Applicant will convene regular quarterly meetings of the key managers for the Principal Team Members in the grant: HACM (Co-applicant), HACM (Housing), HACM (People), RACM (Neighborhood), Milwaukee Public Schools (Education). The meetings of this leadership team will be co-chaired by Sharon Robinson, Director of Administration (DOA) for the City, and Tony Perez, HACM Secretary-Executive Director. In her role as DOA Director, Ms. Robinson oversees key city departments, including the Community Development Grants Administration (which is the conduit for CDBG funds), the Purchasing Department, the Information and Technology Division, the Office of Environmental Sustainability and the Election Commission. The DOA Director is the go-to position for operations within the City of Milwaukee. This Lead Team will have both the responsibility and opportunity to report progress, problems, and proposed solutions. Each Implementation Entity is held responsible for activities and outcomes achievement in their respective areas of expertise, and will chair subcommittees for each area of involvement (Neighborhood, Housing, People, Education). These subcommittees will include significant partners and other stakeholders in their focal areas (*e.g.*, People), including resident representation, and will bring information on activities, achievements and issues/concerns back to the leadership team for discussion and resolution. The Mayor will be briefed on major accomplishments and issues related to the Westlawn transformation during the quarterly Accountability in Management (AIM) meetings for the Housing Authority which focus on measuring progress toward attaining organizational goals and objectives, and implementing best practices.

I.6 Evidence-based Decision Making

The Principal Team Members have incorporated practices, programs, and strategies into the Westlawn Transformation Plan that are based on strong evidence to achieve effective outcomes.

Major examples include the following (with supplementary documentation in Attachment 50):

- 1. Education (Early Childhood Education):** Both MPS Head Start program and SSNC uses the *Creative Curriculum for Preschool*, a comprehensive integrated curriculum and assessment system. The metric used in the program is the “Number and % of children in kindergarten who demonstrate ... age appropriate functioning across multiple domains of early learning as determined using developmentally appropriate early learning measures.” It is an evidence-based program with at least four studies conducted to evaluate its effectiveness, most recently by Philliber Research Associates for the Hartford Foundation, with several having a treatment and control group (*e.g.*, FACES study compared Head Start classrooms that used Creative Curriculum to those that did not). The studies found positive to significant gains using Creative Curriculum.
- 2. Education (K-12): 21st Century Community Learning Centers (CLC)** is a program sponsored by the U.S. Department of Education and used at Browning. The CLC is a model of an afterschool programs with academic support services and is directly related to the metric, “Number and % of students at or above grade level for math and English language arts.” Promise Neighborhoods Research Consortium rates the effectiveness of this program as 1 (Meets criteria for effectiveness).
- 3. Education (K-12):** MPS is implementing a *Comprehensive Literacy Plan* based on the *Response to Intervention (RtI)* 3-tier model. This literacy plan directly measures the metric “Number and % of students at or above grade level according to math and English language arts.” This is an evidence-based model based on a number of studies that the What Works Clearinghouse has rated as minimally to strongly effective for its various components.

4. **Public Safety:** HACM and MPD will implement a *neighborhood watch program* in the Westlawn CNI neighborhood, which will directly impact the metric for reduction in violent crime. A number of studies have shown the relationship between neighborhood watch and reduction in neighborhood crime and greater social cohesion. A systemic review of studies that was done in 2008 by Bennett, Farrington, and Holloway showed that overall Neighborhood watch programs resulted in reductions in violent crimes of 16-26%. The Promise Neighborhoods Research Consortium rates this program an effectiveness level of 1—(Meet criteria for effectiveness).
5. **Public Safety:** The design for Westlawn incorporates *Crime Prevention Through Environmental Design (CPTED)* (e.g. better lighting, open view of public spaces, strategic placement of greenery, direct access to dwellings). CPTED is an evidence-based approach accepted by U.S. DOJ and HUD. The Bureau of Justice Assistance Center for Program Evaluation and Performance Management has reviewed CPTED evaluation studies and has concluded that implementing CPTED strategies does impact crime (reduce crime).
6. **Public Safety:** To reduce crime in the Westlawn neighborhood, HACM and MPD are also working together to increase *community policing (beat patrol/foot patrols)* in the neighborhood especially around hot spots for crime such as the KaBOOM! playground, the linear park, and the school/SSNC. Several studies have shown a direct impact on reducing crime rates through use of beat patrols/foot patrols (the Philadelphia Foot Patrol study (Ratcliffe, Taniguchi, Groff and Wood) or the study of Operation Impact in New Jersey (Piza, O’Hara).
7. **Health:** UWM College of Nursing will implement health promotion programs based on *Individual and Family Self-Management Theory* focusing on chronic disease prevention. This is an evidence-based approach that is fairly intuitive: individuals that engage in self-management (SM) behaviors improve their outcomes. The Ryan-Swain paper reviewed the literature and studies surrounding SM and this will be incorporated into our health strategy with a direct correlation to the

overall outcome of “Children, youth and adults that are physically and mentally healthy.”

8. **Health:** There are a number of studies that have shown that *community gardens* improve access to and consumption of fruit and vegetables, and that they can improve physical activity for the gardeners. They are also a strategy to increase fruit/vegetable availability in food deserts. This will directly impact the overall outcome of “Children, youth and adults that are physically/mentally healthy.”

9. **Health:** *Community-based approaches to the prevention and management of hypertension and cardiovascular disease* have been shown to be successful in varying degrees at identifying and educating individuals at risk (Ferdinand, et. al. published in the Journal of Clinical Hypertension). This will directly impact the overall outcome of “Children, youth and adults that are physically and mentally healthy.” “*With Every Heartbeat is Life*” is one of these evidence-based approach developed by the National Heart, Lung and Blood Institute.

10. **Employment:** More than 20 years of research went into the *WorkNet model* of career development and job placement for persons with barriers, also known as the “*No One is Unemployable*” model. This will measure the metric: “Number & % of adults working.”

11. **Employment:** One of the programs that we will be using for workforce development will be a *Youthbuild training* program in coordination with the Milwaukee Area Workforce Investment Board. This will measure one of the economic metrics, “Number and % of adults working full and part-time”. Youthbuild is an evidence-based approach to job training –studies include the Hahn, Leavitt and Horvat (2004) study of 900 graduates from 30 programs, and the Wright study from 2001 funded by DOL that compared the success of Youthbuild programs with other welfare-to-work programs with similar eligibility requirements. Youthbuild graduates earned 16% more.

12. **Employment :** *Transitional jobs (TJ or subsidized employment)* will be a program targeted to those that meet the eligibility requirements of the program and that need transitional (subsidized)

employment to gain experience in the workforce, and work their way into unsubsidized employment. Bloom reviews the most recent studies done on TJ; there have been large short-term increases in employment through the program for hard-to-employ groups. While there is less evidence for post-program increases in earnings, there are positive impacts on other key outcomes. This program will measure one of the metrics, “Number and % of adults working full and part-time”.

I.7 Collection and Use of Data to Achieve Core Goals of the Transformation Plan

HACM has established baseline metrics for Westlawn wherever possible and outlined them in other exhibits of this application: the physical needs of the neighborhood are detailed in Exhibit D, the neighborhood is described in Exhibit E, and Westlawn residents’ baseline needs for services as documented by the resident survey are described in Exhibit H. The Transformation Plan has been specifically tailored to meet those needs of Westlawn and Choice Neighborhood residents identified in the baseline metrics and strategies and activities that will result in measurable improvements to the neighborhood and for its residents through a range of Housing, Neighborhood, People and Education activities undertaken by Principal Team Members and other community partners.

Metrics regarding housing development outcomes (*e.g.*, number and type of units developed, income mix achieved, accessibility, green building criteria, etc.) are currently tracked by HACM, and will continue to be tracked for the implementation of this CNI grant. For metrics related to the People plan, HACM currently utilizes two databases: VisualHomes (basic resident/voucher participant data with current income) and Tracking at a Glance (case management software). Tracking at a Glance tracks information on the household, supportive service referrals and completions, and relocation information on multiple moves if necessary. HACM has utilized the software for its last three HOPE VI grants to track information on HACM’s Education Initiative, tracking information on schools attended by children from the target site, student grades from report cards, and other education and schools-related information. In addition, MPS has agreed to match neighborhood addresses to their

overall student database to provide overall data on school attendance, reading and math test scores, etc.). This resident-specific data will be supplemented with secondary data sources such as the overall performance of the four neighborhood schools (*e.g.*, accountability scores, test scores compared to the state).

For the neighborhood strategy, the City of Milwaukee and the Redevelopment Authority of the City of Milwaukee (RACM) will provide overall information on the neighborhood to track median home sales prices, building permit activity, long-term vacancy rates, and neighborhood employment rates. The Milwaukee Police Department will provide Part I violent crime rates and other crime data. Finally, HACM will supplement this resident-specific data with secondary data sources, such as other general neighborhood metrics (*e.g.*, reading and math test). The Lead and Co-Applicants will be responsible for ensuring that data collection and analyses are coordinated to minimize and eliminate redundant surveying. Impact Planning Council will be engaged to perform an evaluation of the Westlawn Transformation Plan, the strategies and outcomes, and to assist with data collection and analysis. Impact Planning Council, a private, non-profit social services, research and planning organization, has more than 30 years of health and human service programming experience and has previously evaluated HACM's six HOPE VI grant programs. Impact Planning Council will assist the Principal Team Members by coordinating the overall collection and analysis of data from both primary sources (*e.g.*, coordinating surveys of representative samples of Westlawn residents on topics such as utilization of supportive services or on attitudes about the neighborhood including safety, so that partners do not do multiple or duplicative surveys) and from secondary sources (*e.g.*, HACM databases, school records, data from the early childhood education partners, crime statistics, quarterly wage earning reports from the State of Wisconsin, property valuation, etc.). Impact will analyze all data collected to address the impact of the Transformation Plan on the lives of Westlawn residents, the nature and extent of economic development generated in the community, and the effect

of the revitalization effort on the neighborhood.

Data collected for quarterly HUD reports as well as the data from interim reports from Impact will be shared with the Principal Team Members at regular quarterly meetings of the major partners in the grant: City of Milwaukee/Lead Applicant; HACM/Co-Applicant; HACM/Housing and People; RACM/Neighborhood; MPS/Education and other subgroups to discuss achievements; to identify potential problems, service gaps, or potential new evidence-based programs, new partners or new resources; and to refine or change the Transformation Plan strategies and activities when needed.

I.8 Affirmatively Furthering Fair Housing

The Westlawn Transformation Plan is designed to advance fair housing goals by:

- 1. Increasing economic and racial/ethnic diversity within the neighborhood.** After revitalization, Westlawn will be a much more economically diverse community than it currently is. It will be transformed from what was Wisconsin's largest public housing development (originally 726 units of 100% public housing) into an 956-unit mixed-income community: 250 units redeveloped during Phase 1 which was completed in 2012, 708 units to be built through the Transformation Plan. The 708 units include 394 public housing units, 123 other affordable rental units, 141 market-rate rental apartments, and 50 market-rate for-sale homes. To broaden the range of incomes in Westlawn's affordable units, HACM has a local preference policy for families with a broad range of incomes, which will result in a higher proportion of working families in the Westlawn neighborhood over time (Wisconsin prohibits preferences based on source of income, such as employment). By opening the wait list to higher income families and using its self-sufficiency programs to provide opportunities for upward mobility, HACM will improve homeownership opportunities for residents.
- 2. Providing existing residents with the choice to pursue housing choices in areas of greater racial, ethnic, and income diversity.** During the relocation process, HACM will provide residents of Westlawn with information on relocation options, including the choice to relocate temporarily or

permanently. HACM has had great success in using its Section 8 program to promote more integrated housing. More than 50% of HACM's Section 8 assistance is used in "non-impacted" areas. HACM will help any Westlawn residents who choose to relocate off-site to identify good housing options in economically and racially diverse areas. HACM also actively promotes opportunity for HCVP participants through the portability provisions of its Administrative Plan.

3. Demonstrating any replacement housing located outside of the target neighborhood increases the racial and ethnic diversity of the neighborhood. All planned replacement housing is located within the target neighborhood.

4. Ensuring that buildings and housing are accessible and visitable by persons with disabilities. HACM will increase the accessibility of the Westlawn housing by ensuring that 10% of the rental housing units are accessible to persons with mobility impairments, 3% for those with hearing impairments and 3% for vision impairments. In addition, HACM will incorporate the principles of universal design and meet and exceed HUD's visitability and adaptability standards in 60% of the units that are not fully accessible.

5. Demonstrating that the proposed Transformation Plan is consistent with the Analysis of Impediments to Fair Housing for Milwaukee. Milwaukee's Analysis of Impediments to Fair Housing Choice identified socioeconomic status – based on education, employment, and income – as the key factor that contributes to racially segregated housing. To improve residents' socioeconomic status, the Transformation Plan includes specific strategies to address education, job training, employment, health, and other needs, in order to build residents' capacity to earn, save, become economically independent and access a wider range of housing options. In addition to socioeconomic factors, the lack of available units, especially for larger families, limits fair housing choice. To address this deficiency the proposed revitalization at Westlawn incorporates 96 three-bedroom units and 36 four-bedroom units.