

Name of Exhibit:  
**Narrative Exhibit H:  
People Strategy**

Applicant:  
City of Milwaukee

Name of File:  
NarrativeExhHPeopleStrategy

## **EXHIBIT H: PEOPLE STRATEGY**

It may be an overworked cliché, but the concept of a “rising tide floats all boats,” as a mark of the grant-worthiness of an application, is fundamental and indispensable. The obstacles residents face in their quest for a better life for themselves and their family must be addressed and overcome in tangible, practical, and measurable ways. The results of our needs survey tell us what those obstacles are and the programs and partnerships we have or propose to create are the tools we plan to use through this grant to address them.

### **H.1 Resident Needs Survey and Results**

Basic demographic information and income information is from HACM’s database as of January 5, 2015. On that date, of the 394 Westlawn units, 382 were occupied by public housing households (3 additional units were special purpose units used for resident services and/or maintenance services). In February/March 2012 and August 2013, HACM staff carried out an in-depth needs survey of Westlawn residents *via* an in-person interview process. 222 existing residents as of January 2015 had participated in that survey. Additional surveys were done in January 2015 of 23 households out of the 40 that moved into the development during 2013 and 2014. Thus, 245 households, or 64.1%, have completed the survey.

- **Race/ethnicity/language:** Of the 942 residents as of January 5, 2015, 920 are African American (98%), 21 are white (2%) and one is Asian; 34 are Hispanic in ethnicity (4%). English is the primary language for all but two Spanish-speaking households (one with no English skills).
- **Disabilities:** Of the 942 residents, 143 are disabled (15%), including 37 children (8% of children), 79 adults ages 19-61 (18% of 19-61 year olds), and 27 seniors (73% of seniors).
- **Marital status and household size:** Of the 382 current households, 209 are headed by single women with children (55%), 9 by married couples (2%), 7 by unmarried couples (2%), and the remaining 157 (41%) are single individuals. Average household size is 2.5; largest has 8.

- **Age:** Of the 942 current residents, 439 are adults age 19-61 (47%), 37 are 62 or older (4%), and 466 are children between 0-18 in age (49%). Of the 466 children, 130 are age 5 old or less (28%), 202 are between 6-12 years old (43%), and 134 are between 13-18 years old (29%). There are 134 “transition age youth” ages 16-24, or 14% of the population.
- **Length of tenancy:** Of the 382 households, 47 have lived in public housing for over 20 years (12%), 97 for 11-19 years (25%), 114 for 6-10 years (30%), and 124 for < 5 years (32%).

### **Health, Education, and Economic Self-Sufficiency**

- **Children, youth and adults that are physically and mentally healthy:** Most residents (97%) are connected to primary care physicians, clinics, or otherwise have a medical home. A lower number (75%) visit the dentist on a regular basis, likely due to lack of dental insurance. Of those surveyed, 18% of adults report excellent physical health, 36% good, 32% fair, and 14% poor or very poor health. Most (86%) have some form of health insurance, with the largest providers being Medicaid (30%), Medicare (18%), BadgerCare (state insurance for low income adults and children without other insurance) (32%), and insurance through work (10%). Significant adult medical problems: high blood pressure (44%), asthma (29%), weight (27%), arthritis (24%), depression (18%), and diabetes (17%). Of the 149 households with children, 36% reported at least one child with asthma, 9% had a child with weight problems and 13% reported a child with depression or other mental illness.
- **Children entering kindergarten ready to learn:** Of the 130 children ages 0-5, 92 (71%) live in households that responded to the survey. Their parents’ responses indicated that 58% attend a childcare center. Of those, only 52% are in a high-quality program in which children enter kindergarten ready to learn.
- **Youth, including youth with disabilities, graduate from high school college- and career-ready:** The citywide high school graduation rate was 60.5% (four year) and 70.8% (five year); due to the number of schools that Westlawn children currently attend, the specific rate for Westlawn

children is not able to be calculated.

- **Economically stable and self-sufficient households:** According to the survey, of adults age 19-62, 46% are employed and 54% are not employed. However, only 29% state that they are working 30 or more hours per week. The median annual income for current households is \$16,640, well below the 2010 median City of Milwaukee household income of \$35,851, and even below the 2014 extremely low income limits (30% AMI) in the Milwaukee metropolitan area. Sources of income: 62% of households have wage income (primary source of income for 56%), 18% have social security (primary source for 11%), 27% have SSI (primary source for 19%), 1% have pension income, 17% have child support, 2% have unemployment, 6% have some other non-wage income such as income from family members, 1% have TANF, and 7% have imputed welfare benefits. Of the 382 households, 111 (29%) receive food stamps with an average value of \$4,075/year, and 49% of respondents stated they receive EITC.
- **Education:** Among adult respondents to the survey, 66% have a high school diploma or equivalency degree and 11% have a GED. Of the 23% of adults who lack a diploma or GED, 61% are interested in getting one. Few have any higher education: only 8 respondents have a Bachelor's or higher, 13 have an Associate's degree, and 24 have some sort of certification.
- **Computer:** About 51% of households surveyed have an in-home computer, but only 35% have Internet access. 34% of adults say they have little or no experience with computers, and that the computers are used by their children; 50% of adults were interested in computer training.
- **Transportation:** In survey, 52% have access to a reliable car. Most of these cars are registered, but 41% state they don't have current insurance; 53% of adults state they have a valid driver's license or permit. 57% of residents rely on the bus system, friends or family, or taxi.
- **Community and safety:** See F.3 Public Safety Strategy for results.
- **Bank accounts:** 54% have some type of bank account; 23% regularly and 16% sometimes use a

check cashing business. 12% report they took out a payday loan in the last 12 months, and 12% currently owe on a payday loan.

**Resident Satisfaction with Services and Preferences for Improved/New Services:** 56% use the services of Silver Spring Neighborhood Center (SSNC) and all who use the service are satisfied. For those who do not use them, the most-cited reason was that they were not aware of what services are available (52%), followed by the fact that the times were not convenient (14%). When asked about improved or new services, 43% cited credit repair, 41% cited an exercise program, 27% cited financial education and 27% cited job search assistance. During interviews and public meetings, a number of residents also cited the need for healthier food options in the neighborhood.

## **H.2 Supportive Services and Programs**

HACM will coordinate the People strategy for Westlawn and will build on the lessons learned and the best practices developed from previous neighborhood transformation programs that HACM has led. HACM has developed a solid and successful approach that provides effective, results-oriented supportive service programs by collaborating and partnering with a range of economic development and social service agencies. The results of the resident needs survey provided the framework for the development of a comprehensive, high-quality, and results-oriented supportive services strategy. Activities will be coordinated *via* a case management system, with a menu of appropriate services and resources meeting the needs of all residents and focusing on children and transition age youth.

**Impact Statement: Children youth and adults that are physically and mentally healthy.**

### **Expected Outcomes:**

- 100% of residents have a medical home
- 67% of residents report excellent or good health
- 95% of residents will report low psychological distress

- 100% of residents will have health insurance
- Residents have increased access to fresh, healthy produce (*this is a priority outcome identified through the neighborhood narrative and resident needs assessment*).

**Needs Assessment Baseline:** 97% of residents reported they have a regular “medical home;” 54% reported excellent or good physical health, but there were significant adult and child health issues, including high blood pressure, asthma, weight, arthritis, depression (18%), and diabetes (17%); 89% had a score of < 12 (low) on the K6 scale of psychological distress, meaning low psychological distress; 86% of residents report they have some form of health insurance.

**Strategy:** While most residents (97%) are connected to primary care physicians, clinics, or otherwise have a medical home, there are still about 14% without health insurance. As some of the surveys were done prior to much of the implementation of the Patient Protection and Affordable Care Act (ACA), it is possible that the number of uninsured residents has gone down; however, a major strategy for HACM Case Managers will still be to ensure households have a medical home and that they get connected to health insurance. The Case Managers will also consider physical and mental health issues when working with residents on their Individual Development Plans. Partners in our healthcare strategy include the University of Wisconsin-Milwaukee (UWM) College of Nursing, Milwaukee Health Services, and Growing Power. The UWM College of Nursing has collaborated with the on-site Silver Spring Neighborhood Center (SSNC) since 1987, providing primary care services including a walk-in clinic at SSNC that is open about 50 hours per week. The clinic is staffed by six nurse practitioners, assisted by nurse clinicians and many nursing students.

Historically, Milwaukee ranks 7<sup>th</sup> worst in infant mortality in the nation. In addition to their existing programs, the clinic has committed to expand its outreach to pregnant mothers and to conduct group prenatal appointments for low-income pregnant women in an attempt to reduce infant mortality and improve child health and parenting skills. Additionally, clinic nursing students will

assist, inform and educate residents with high blood pressure, diabetes and other medical issues through the use of the National Heart, Lung, and Blood Institute program “With Every Heartbeat is Life” (WEHL), as well as health promotion programs based on Individual and Family Self-Management Theory (IFSMT) and nurse case management, focusing on chronic health conditions. Health education will also include information on the ACA.

In addition, the UWM College of Nursing has been the coordinator of the Westlawn Partnership for a Healthier Environment, through a CARE (Community Action for a Renewed Environment) cooperative agreement with the U.S. Environmental Protection Agency. The CARE group will expand their bike maintenance repair program and will implement a new grant program, “Biking for Health: A Pilot Study of Bicycling Intervention to Improve Physical Activity”, which also helps to meet the stated need of residents for an exercise program.

HACM also has a partnership with Milwaukee Health Services (MHS), a federally qualified health center (FQHC). Residents without a medical home who do not utilize the UWM on-site clinic will be referred by the Case Managers to MHS as their medical home. MHS also offers primary comprehensive dental services at its nearby Coggs location, which will help to meet the needs of the 25% of residents who do not access regular dental care. MHS will offer blocks of time for dental appointments, regardless of insurance status to all Westlawn residents. Finally, for those residents with depression or mental health issues, the Behavioral Health team at MHS will be a resource for them to obtain quality behavioral health services.

Growing Power is a nationally-renowned nonprofit organization and land trust which helps combat urban health problems such as obesity and diabetes by providing access to healthy, high-quality, safe and affordable food. Founder and urban farmer, Will Allen, received a MacArthur “Genius Grant” in 2008. Growing Power provides hands-on training in setting up community food systems helping 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 food year-round at its main two-acre farming site only five blocks from Westlawn. HACM will partner with Growing Power to provide information and education on eating fresh fruits and vegetables and operate a “green waste” recycling campaign for composting.

**Residents Served:** For referrals for medical homes, the residents served will be the 12 households currently without a medical home. The rest of the services will be targeted toward the 382 households from Westlawn and 100 from the surrounding neighborhood.

**Service Providers:** UWM College of Nursing, City of Milwaukee Health Department, Milwaukee Health Services, Growing Power, SSNC.

**Resource Commitment:** CNI Funds: \$640,000; Leveraged funds: \$2,351,936. Major commitments include \$2,042,150 from UW-Milwaukee College of Nursing, \$125,000 from Silver Spring Neighborhood Center, \$122,120 from Westlawn Partnership for a Healthier Environment, \$52,500 from Growing Power and \$8,131 from Milwaukee Health Services, Inc. Much of the strategy involves leveraging existing high-quality services and programs that are already in the Westlawn neighborhood. For example, one the of the two MHS clinics, Isaac Coggs Heritage Health Center, is located only 14 blocks from Westlawn and 6 blocks outside the neighborhood, and has been serving local residents with medical and dental services for some time. Growing Power and UWM College of Nursing have been providing high quality services within the neighborhood as well.

As noted, these commitments directly address the needs identified in the needs assessment. In particular the increased access to physical and mental medical health care and the referral to a medical home of those without directly address the serious medical issues and lack of a medical home that arose in the needs assessment. In addition, the resources committed by Growing Power directly address the need identified in the Neighborhood narrative and the resident survey – the

scarcity of fresh, healthy produce options in the neighborhood. The following table is a summary of the positions available in health related case management programs:

Program	Slots	
	Westlawn	Neighborhood
Nurse Case Management	75	20

**NOTE: The discussion of the outcome and metrics for education issues is presented below in the Education Strategy section (H.5).**

**Impact Statement: Households are economically stable and self-sufficient.**

**Expected Outcomes:**

- 45% of working age adults are working full time and 60% working full or part time.
- Average earned income of HUD-assisted households (excluding seniors and disabled) at the end of five years is \$20,000.
- 100 Westlawn residents will complete financial literacy training and will open an Individual Development Account (*this is a priority outcome identified through the resident needs assessment*).

**Needs Assessment Baseline:** 29% of adult residents are working 30 hours or more/week and 46% are working full or part time; Average earned income of HUD-assisted households (excluding senior/disabled) is \$14,551; 43% do not have a bank account and are in need of financial literacy education.

**Strategy:** HACM will work with all non-disabled, non-elderly adult residents to engage them in work development activities. The needs assessment shows that while a significant percentage of non-disabled adults are employed, many are either unemployed or under-employed (less than 30 hours per week or minimum wage), and a number of adult children in the household are not employed at all. Helping residents to get and stay employed and move upward on their career ladder is a top priority for HACM. HACM employs Resident Employment Coordinators (RECs) to develop relationships

with hundreds of local employers. The RECs function as job brokers, developers, and coaches helping residents find and keep jobs. The Case Manager will refer residents in need of employment to the RECs. HACM's workforce development strategy is based on the principle that everyone is employable, and is designed to ensure that every resident, regardless of the point of job entry, is able to develop and sustain a path to self-sufficiency through work. The approach is based on the proven strategies outlined in Debra Angel and Elisabeth Harney's book, *"No One is Unemployable: Creative Solutions for Overcoming Barriers to Employment,"* an evidence-based program otherwise known as the Worknet model. HACM's RECs will provide a comprehensive set of intensive individual and group activities that address every aspect of employment, including motivational interviewing. Case managers will coach residents providing guidance on the development of individualized plans, goals and activities to improve their economic self-sufficiency. SSNC operates a successful Transitional Jobs Program, an evidence-based program funded by the U.S. Department of Labor through the State of Wisconsin, training and linking residents to transitional jobs with local community employers, and would continue that program, along with its GED/ABE program.

HACM also leverages training and other workforce development resources through community agencies such as the Milwaukee Area Workforce Investment Board (MAWIB), TANF/W-2 agencies, Wisconsin Regional Training Partnership/Big Step, Milwaukee Community Service Corps and Milwaukee Area Technical College (MATC), as well as through employers. In the Fall 2010, the Milwaukee Job Corps Center opened and is located on North 60<sup>th</sup> Street, within a one mile of the Westlawn Development. It provides intensive job training for young adults in high-demand industries. These job training opportunities help residents compete for promotions, and/or for better paying jobs. HACM Case Managers and RECs will also encourage residents to build skills and get into career paths in high-demand industries. HACM is partnering with the Great Lakes Community Conservation Corps to provide a Green Zone Zero Energy Homes Initiative in the

neighborhood--a three-prong approach by Great Lakes CCC to reduce energy consumption in 10-20 older homes, implement renewable energy technologies in homes that have been retrofitted to energy-efficiency standards, and train 15 disadvantaged young adults with the knowledge and skills to pursue careers in the emerging green jobs economy. Another job training program will be with the Wisconsin Auto and Truck Dealers Association (WATDA)—due to an aging workforce, dealers are in high need right now for young mechanics to work on today’s automobiles, especially with new technologies such as hybrid and CNG vehicles. In 2013-14, HACM was part of a partnership to train young adults in this industry and in solar; 250 participants received nationally recognized credentials in solar water heating and automotive repair (standard, CNG and hybrid); 158 of the participants at the project’s end were employed full-time; 42 instructors in the automotive field developed and implemented new instruction techniques; 30 area auto dealers were engaged in the training process and 11 dealers hired program participants. HACM will again partner with WATDA to replicate the training but focus on residents of the Westlawn development and neighborhood.

Wisconsin Women’s Business Initiative Corporation (WWBIC) has been operating since 1989 as a statewide nonprofit economic development corporation, offering business education, technical assistance, and access to capital to women, minorities, and low-income individuals pursuing entrepreneurship and business development as a path to economic self-sufficiency. HACM has partnered with WWBIC since 1999, and will bring WWBIC’s financial literacy training and other services to Westlawn residents to meet their stated need for financial education and credit repair. WWBIC’s financial program, called “Make Your Money Talk” (MYMT), is a personal money management education program that shows participants how to create a personal budget, develop a savings plan, clean up their credit, avoid the excessive fees of payday loans and check-cashing businesses, and open and use an Individual Development Account (IDA). By opening an IDA, a participant’s savings up to \$2,000 are matched 2:1 (for a potential total of \$6,000), and can be used to

start a small business, to purchase a home, or to cover educational costs. Having a bank account correlates strongly with ownership of other financial assets such as housing and cars, and is the most significant strategy for eliminating the use of predatory loans by low-income residents.

Families will struggle to attain self-sufficiency without sufficient investment in the youth of the community. Positive youth development will also be a part of HACM's services strategy at Westlawn. SSNC is one of the strongest neighborhood assets in the area, and will be the center of most People activities at Westlawn. Over its 50-year history, SSNC has grown from a 3,000 square foot afterschool program to a 50,000 SF community center that offers a comprehensive range of services: prevention-focused health and social services, recreation, early childhood education, after-school education and programming, adult education, employment and housing assistance, community organizing, emergency services, and advocacy. As part of the Choice Neighborhoods transformation, SSNC has committed \$1,128,600 to expand outreach to Westlawn families, including its comprehensive youth leadership, sports, recreational and educational programming for children and youth. These programs have promoted violence prevention, social skills development, and community engagement for generations of Westlawn youth.

**Residents Served:** The job training, skills building and placement program will serve 200 Westlawn residents; the adult education classes will serve 40 Westlawn residents; Transitional jobs and other job training programs will serve 25 Westlawn residents; and financial literacy and asset-building counseling will serve 100 Westlawn residents.

**Service Providers:** SSNC, Milwaukee Area Technical College, Milwaukee Area Workforce Investment Board, Milwaukee Area Workforce Funding Alliance, Milwaukee Community Service Corps, Milwaukee Job Corps, Wisconsin Regional Training Partnership/Big Step, Wisconsin Women's Business Initiative Corporation.

**Resource Commitment:** CNI Funds: \$1,368,822; Leveraged funds: \$3,473,139. Major

commitments include over \$1,600,000 from SSNC, \$500,000 from Milwaukee Area Workforce Funding Alliance, over \$193,000 from Milwaukee Area Workforce Investment Board, \$203,042 from Wisconsin Women’s Business Initiative Corporation, \$172,500 from The Foundation of the Wisconsin Automobile and Truck Dealers Association, and \$63,000 from the Milwaukee Job Corps. Much of the strategy involves leveraging existing high-quality services and programs that are already in the Westlawn neighborhood. SNCC has been promoting violence prevention, social skills development, and community engagement for generations of Westlawn youth, as well as its successful Transitional Jobs Program and GED/Adult education program. In addition, the Milwaukee Job Corps Center is within a one mile of the Westlawn Development.

As noted, these commitments directly address the needs identified in the needs assessment. In particular underemployment was noted as a problem, as was overreliance on payday loans, which will be addressed by job training and increased access to banking products (including and IDA) and financial literacy training. When asked about new services that are needed in the neighborhood, a significant number of residents cited financial education and job training. This strategy addresses both needs very well through the work of the WWBIC and the 416 slots in job training programs that will be available. The following table is a summary of the positions available in economic self-sufficiency related-case management and job training programs:

Program	Slots	
	Westlawn	Neighborhood
Case Management	394 (households)	0
Job Training	416	200

**H. 3 Case Management:**

HACM’s People Strategy will offer case management that will concentrate on all residents of

Westlawn before, during and after revitalization. The case management team will (1) ensure the successful relocation of original residents; (2) in coordination with the Senior Asset Manager, ensure that all original residents understand their choice of all possible housing options and are prepared to return to the revitalized site or successfully relocate permanently; and (3) ensure that residents are working towards their self-sufficiency and quality of life goals. As residents are relocated temporarily from the site or back to the site to reoccupy at the end of the construction, HACM Case Managers will assist residents to ensure access to early childhood education, schools, transportation to jobs, and other factors are not negatively impacted, and this will be included in the discussion of housing options. For those “hard to house” or high need residents who have multiple, persistent barriers to self-sufficiency, HACM staff will coordinate an intensive, targeted, and comprehensive case management approach to increase resident self-sufficiency and reduce issues which impede their return to Westlawn and/or maintain stability in other housing. HACM’s case management team will consist of six (6) comprehensive family-centered case managers that will focus in on the entire needs of the family, will assist adults with supportive service needs in the areas of employment, health, early childhood education, adult education, transportation, and/or any other supportive service needs of the household. In addition, they will also act as an Education Case Manager as well for children in the household to work with children and their parents on youth education and enrichment and parental involvement (see Section H.4.b below for a description of the HACM Education Initiative). Residents that are unemployed or under-employed will be referred to a HACM Resident Employment Coordinator (REC) for specific job search assistance an approach that has been successful in other developments. HACM’s Youth and Family Services Manager, Maria Rodriguez, will supervise the team and coordinate services between HACM’s case management team and other supportive service partners. Case Managers will work closely with the REC to develop, when necessary, a workforce development strategy for each non-disabled adult member of the household, reinforcing HACM’s

mission of providing each resident the necessary tools to be a self-sufficient as possible. While nearly half of Westlawn households have some wage income, other adults still need to develop the necessary skills to enter the workforce, and some of those with wage income are under-employed. Case Managers will work with partner agencies to identify and fill any gaps in services and will mentor and encourage parents to connect their children to appropriate resources to meet their educational, social and health-related needs. Additionally, HACM Case Managers will focus on transition age youth (16-24), including those shifting out of foster care. This cohort faces significant barriers to continuing school or entering the workforce. The Case Management team will provide the necessary assistance to connect to college or career, including job training if appropriate (such as Job Corps, MCSC, MATC, etc.) and support services necessary for their transition. A triage system will be used to ensure that resources and services get to those in need, particularly those at risk or in crisis. As elderly and disabled residents often have significantly different needs than other residents, HACM Case Managers will develop care and self-sufficiency plans designed to meet their particular needs, allowing them to live as independently as possible. The Case Manager will determine eligibility for health and social programs; ensure residents are linked to medical and other appropriate service providers; and provide linkages with community resources to plug any services gaps. The anticipated client-to-case manager ratio is a maximum of 66 households per case manager (394 total / 6 CM).

#### **H.4 Supportive Services Sustainability**

HACM and many of its partners are committed to trying to sustain key supportive services beyond the five-year grant period. SSNC is a long-term partner in the Westlawn neighborhood and intends to continue the services it provides to neighborhood residents beyond the period of the grant. While intensive case management may not be continued beyond the grant, HACM is committed to sustaining its employment case management services for those in need as well as the Education Initiative after the grant has ended. MPS is committed to improving neighborhood schools to for the

long term, and the addition of Carmen Middle/High School is also for the long-term. The City and HACM will also implement an endowment trust fund to sustain services. Currently, HACM has put in the budget an amount of \$950,000 for endowment. HACM and the City have begun approaching foundations, including the Greater Milwaukee Foundation and other partners to raise the necessary matching amount. SSNC has already firmly committed \$415,000 (\$83,000 per year for 5 years) towards the endowment (Attachment 56).

## **H.5 Education Strategy**

**a. Early Learning.** The 382 occupied households in Westlawn include 130 children ages 0-5. Of these 130 children, 92 (71%) live in households that responded to the needs survey conducted by HACM. Responses indicated that 58% attend a childcare center and 42% of children aged 0-5 were not in childcare programs (most of these stay home with their parents). Of the children in childcare, parents stated that 52% of them were in high quality programs (about 31% of all children 0-5). Based on enrollment data, 34 children from Westlawn were enrolled in SSNC Early Childhood Education (ECE) program or in the K4/K5 program at Browning Elementary on-site.

**Program Excellence:** HACM has partnered with three ECE providers: SSNC and its ECE Center, Milwaukee Public Schools' Kilbourn Elementary School and their and Day Care Services for Children (DCSC). SSNC will be HACM's primary partner for the provision of ECE. SSNC's ECE Center has been serving the Westlawn community since 1964. All of the lead teachers have at least an Associate's Degree and assistant teachers meet state certification standards. There are currently approximately 65 children enrolled in the SSNC ECE program, but the program has space to expand. In the past year, 53% of children enrolled were from Westlawn and 54% of families had incomes less than \$15,000. While SSNC's ECE Center does not have accreditation from the National Association for the Education of Young Children (NAEYC), it is widely recognized as a high quality, results-oriented ECE program. It has won many awards for its quality programming: from the Family

Resource Coalition, a national organization of family support providers; the Eureka Foundation in Washington, DC; the Wisconsin Region of the National Conference of Christians and Jews; the Nonprofit Center of Milwaukee; and the Childcare Action Campaign in NY. And while the SSNC ECE Center's Youngstar (A Wisconsin-started system) ranking is 3 out of 5 stars ("Meets proficient levels of quality standards"), the Center has already planned further training for its staff during 2015 that will improve its ranking to 4 stars ("Elevated standards of quality"). There are few 4 or 5 star centers in Milwaukee – the closest is 2.5 miles from Westlawn.

Studies have shown that children enrolled at the SSNC ECE Center have benefited greatly. For example, Literacy First, a successful collaborative effort with Browning Elementary School, tracked three groups of children in the first grade. The first group attended the SSNC ECE Center, the second group attended other childcare programs, and the third group went to kindergarten straight from home without any early childhood experience. In the first group, 92% of the children tested at or above grade level, compared to 60% of the children in the second group and only 30% of the children in the third group. In addition, in a recent annual report to the local United Way, the SSNC ECE Center noted that over the course of the year, 97% of the enrolled children improved in their cognitive skill development; 94% in their social-emotional skills; 91% in their communication skills; 100% in their motor skills; 94% in their literacy skills; 97% in their ability to cooperate with others; and 97% in their ability to behave appropriately in class. Similarly, HACM will work closely with MPS and will refer children to its high quality Head Start program at Kilbourn Elementary.

HACM is also partnering with **Day Care Services for Children (DCSC)**, a local Head Start provider that has multiple branches around the city. The partnership with DCSC will expand Westlawn families' geographic choices for ECE programs, important during the relocation period when families may not live near SSNC. DCSC was one of the first Head Start programs in the nation and their sites continue to provide high quality early childhood education including an infant and

toddler childcare program, a preschool program for children up to age 3, and a quality early childhood education program for children age 3-5. The staff of DCSC is highly trained in early childhood education and the curriculum is a comprehensive child development program. Two of DCSC sites including that closest to Westlawn are ranked with 3 stars in the Wisconsin YoungStar rating and one of the sites is ranked 4 stars.

**Specific Activities:** All of the classrooms in the SSNC ECE Center utilize the Creative Curriculum, one of the curriculums recommended by NAEYC and widely used by Head Start programs throughout the country, based upon Jean Piaget's work on cognitive development and Erik Erikson's stages of social-emotional development. SSNC's ECE teachers provide individualized programming and goal setting for each child based upon regular "Ages & Stages" assessments, a well-respected screening tool that helps to promptly and effectively identify any developmental and social-emotional delays. The Ages & Stages tool is recommended by experts including the American Academy of Neurology, the Child Neurology Society, First Signs, and the US HHS's Administration for Children and Families. Experts particularly recommend Ages & Stages for at-risk groups such as economically disadvantaged populations or those with high rates of pre-term births, like Westlawn. Regular Ages & Stages assessments indicate each child's level of language development and determine the need for intervention. Speech/language referrals are made either through the Milwaukee Public Schools or the Birth to Three program.

**Family Engagement and Supports:** The SSNC ECE Center involves and supports parents as important partners in their work. The Ages & Stages assessments are shared with parents so they can have realistic expectations for their children and can help their children get additional help when needed. Teachers go over the assessments with parents, showing where their child is developmentally at present, and where the child should be the next time an assessment is done, so parents know what to watch for. SSNC also organizes parenting activities and supports, such as home visits, Family

Nights, parenting workshops, and at-home literacy activities for parents and their children to do together. With so many services co-located at the SSNC/Browning School facility, SSNC staff can easily connect families with other supportive service they may need, such as immunizations, health care, or the food pantry.

**Intensive Outreach and Enrollment:** SSNC, MPS and DCSC have committed to partnering with HACM to address the needs of the targeted families both prior to and during relocation and post-revitalization. HACM staff will work with all families with young children who are moving to a new location to promote enrolling their children in a high quality ECE program, including those of SSNC and DCSC, and HACM commits to assisting them in completing the paperwork to qualify them for free or reduced price programs. The Case Managers will also assist families in obtaining transportation if it is needed to access a high quality program. Case Managers will closely work with every family that has children age 0-5 with a goal of enrolling at least 65% of them into a high quality ECE program during relocation and post-revitalization. Since the SSNC ECE Center is right on-site at Westlawn and has a very high quality program, HACM will strongly promote enrollment in that program. SSNC has room to expand their current enrollment from 65 to approximately 120, so they will be able to handle most of the referrals. SSNC’s ECE program has been in place since 1964, and they have the consistency, stability and resources to continue to offer this high-quality program well beyond the period of the grant. Indicators that HACM and its evaluator will track to show outcomes include: percentage of families with children age 0-5 enrolled in ECE programs, as well as the United Way indicators mentioned above in F.2 that SSNC already tracks annually.

<b>Outcome</b>	Children enter kindergarten ready to learn.
<b>Metrics</b>	<ul style="list-style-type: none"> <li>• Number and % of children in kindergarten who demonstrate at the beginning of the program or school year age-appropriate functioning across multiple domains of early learning as determined using developmentally</li> </ul>

	<p>appropriate early learning measures.</p> <ul style="list-style-type: none"> <li>• Number and % of children age 0-5 enrolled in a high quality ECE program.</li> </ul>
<p><b>Needs Assessment Baseline</b></p>	<ul style="list-style-type: none"> <li>• Milwaukee Public Schools is currently developing a matrix of indicators to ascertain school readiness and early intervention needs.</li> <li>• 60% of children 0-5 enrolled in a childcare center, but can only document 31% in high quality early learning program.</li> </ul>
<p><b>Projected Results</b></p>	<ul style="list-style-type: none"> <li>• 75% of children in kindergarten who demonstrate at the beginning of the program or school year age-appropriate functioning across multiple domains of early learning.</li> <li>• 65% of Westlawn children age 0-5 enrolled in a high-quality early learning program.</li> </ul>
<p><b>Strategies</b></p>	<ol style="list-style-type: none"> <li>1. Case Managers will work with families to link at least 65% of them to high quality early learning programs</li> <li>2. SSNC will improve its Youngstar rating from 3 stars to 4 stars.</li> <li>3. Case manager will assist families with issues such as transportation, wrap-around care, nutrition, etc., even during relocation.</li> </ol>
<p><b>Residents Served</b></p>	<ol style="list-style-type: none"> <li>1. A minimum of 85 or 65% of 130 children 0-5 in Westlawn</li> <li>2. This strategy will impact approximately all youth that go to SSNC ECE or 85 youth from the Westlawn development and 50 from the surrounding Choice neighborhood.</li> <li>3. This strategy will serve 135 children 0-5 from Westlawn.</li> </ol>
<p><b>Service Provider(s)</b></p>	<p>Silver Spring Neighborhood Center, Day Care Services for Children, Milwaukee Public Schools</p>

<b>Resource</b>	Choice Neighborhood Funds: \$0 – Leveraged funds: \$3,167,000
<b>Commitments</b>	<p>Major commitments include over \$2,600,000 from SSNC and \$525,000 from Day Care Services for Children. Much of the strategy involves leveraging existing high-quality services and programs that are already in and around the Westlawn neighborhood. SNCC has been providing quality early childhood education for Westlawn children since 1964.</p> <p>As noted, these commitments directly address the ECE needs identified in the needs assessment. In particular, 42% of children in Westlawn are not enrolled in ECE, and of those enrolled, 48% are not in a high quality program. This strategy addresses both needs very well through the work of MPS, SSNC and DCSC and the 109 ECE slots available specifically for targeted Westlawn residents per year (25 per year at DCSC, 34 existing and 50 new slots at SSNC) as well as 29 ECE slots for other neighborhood residents.</p>

**b. Schools:** The needs assessment shows that 30% of adult residents at Westlawn lack a high school diploma or GED. The children of Westlawn families are at extreme risk for continuing a pattern of low academic achievement. The Milwaukee high school graduation rate has improved significantly over the past decade, but still lags behind the state or national average. For 2012-13, 60.5% of Milwaukee students complete high school within 4 years compared with 88% statewide, and 70.8% within 5 years compared with 90.8% statewide. Besides public schools and charter schools, students can utilize a voucher to attend what are known as private “choice” schools. While parents are taking advantage of the multiple options available to Milwaukee students, many students are spending significant time traveling to and from schools all over the city. According to Milwaukee Public Schools (MPS) in 2013, 265 students from Westlawn attend 60 different MPS schools. 46 high school students attend 19 schools, 60 middle school students attend 20 different schools and 104

elementary school students and 55 K4/K5 students attend 24 different schools. As there are 336 children living in the development ages 6-18 and 265 in MPS schools, there are at least 71 students attending 20-30 non-MPS choice or charter schools. While some of these schools are in the target neighborhood, the majority are widely distributed over the city, leading to significant transportation time for students. Students from the Westlawn Neighborhood in the local schools are as follows: 132 at Browning, 82 at Kilbourn, 150 at Kluge, and 62 at Carmen.

The performance of the schools in the Westlawn target neighborhood, reflecting 2013-14 Wisconsin Knowledge and Concepts Exam scores, is as follows:

<b>Name of school</b>	<b>School Type</b>	<b>Size</b>	<b>Reading Performance* (Statewide % in parentheses)</b>	<b>Math Performance* (Statewide % in parentheses)</b>
Browning	Elementary	342	Grades 3-8: 10.8% (36.7%)	Grades 3-8: 16.1% (48.8%)
Kilbourn	Elementary	266	Grade 3-8: 5.9% (36.7%)	Grade 3-8: 2.9% (48.8%)
Kluge	Elementary	386	Grades 3-8: 13.1% (36.7%)	Grades 3-8: 16.7% (48.8%)
Carmen Northwest	Middle/High	219	Grade 9 ACT Explore grade growth from Fall 2013 to 2014***: Reading: 1.7 (national 1.4) English: 1.9 (national 1.2)	Grade 9 ACT Explore grade growth from Fall 2013 to 2014***: Math 1.9 (national: 1.1)
Banner Prep	Middle/High	30	Grade 8 and 10: **	Grade 8 and 10: **

\* Reflects the percentage of students scoring proficient or advanced. \*\* Not rated by the State of

Wisconsin for privacy concerns due to group of fewer than 20. \*\*\* Carmen participates in the

Alternate Accountability Process. The score shown is for the growth in the ACT Explore assessment and shows actual grade growth compared to national growth.

**Specific Activities:** Milwaukee Public Schools, the Principal Education Partner, will work closely with the City of Milwaukee, HACM and other partners to ensure that the schools in the Westlawn neighborhood are high quality or on a path to becoming a high quality school. The district's objective is to transform the persistently low performing schools into high performing schools by implementing rigorous academic and behavioral interventions and dramatically increasing resources so students are college and career ready. In February of 2014, the administration developed and implemented two processes to assist in transforming persistently low performing schools into high performing schools: The School Quality Review (SQR) process and the Commitment Schools competitive grant application process. The SQR format included questionnaires, observation tools and matrices to identify a comprehensive picture of individual school needs. SRQs outlined the strengths and opportunities for improvement, aspirations of the school community, and resources. The findings are now a key element in MPS' effort to provide instructional, operational and leadership support. Forty-eight schools received Commitment School support (\$100,000 of Title I funding for 3 years). The implementation of the Commitment School plan involves the following: the schools are led by a Regional School Improvement Specialist and each school is given the flexibility to try approaches independent of District initiatives. While the goals of the Commitment School must be aligned with District goals, each school has goals reflective of the needs of its students.

Browning Elementary School offers an early childhood to 5th grade program and has morning and after-school programming, offering students an option to be in a safe learning environment from 6:00 AM to 6:30 PM weekdays. In addition to a standard academic program, the school has an on-site greenhouse and has access to an outdoor garden that is facilitated by staff associated with Growing

Power. Browning is also the site of a Community Learning Center (CLC) after-school program that is administered by the SSNC. CLC programs offer students assistance in academics and the program is open all age appropriate students. Browning was one of ten MPS schools selected in October 2012 to become a GE Innovation School. Using grant money from GE Medical Systems, MPS hired literacy and math coaches to train teachers and staff to better work with students. In the spring of 2014, Browning was designated as a Commitment School by the MPS Administration, receiving additional funding for a three-year period with focused efforts. As a result of the focused efforts to improve Browning, the school is already showing significant improvements: This year, the gap between target scores and actual scores in reading and math decreased by least least 5% in four out of six grade levels. There also is a positive change in the school environment at Browning. The number of student behavioral incidents declined by 31.7% from December 2013 to December 2014. In the same time period, the number of student suspensions has decreased by 45.7 percent.

MPS has been working to improve the performance of students in both Kilbourn and Kluge Elementary Schools. Kilbourn offers an early childhood to 5th grade program and has morning and after-school programming, offering students an option to be in a safe learning environment from 6:00 AM to 6:30 PM weekdays. Kilbourn teachers use a “Mindful Learning” approach, which calms students and promotes focus. The Godfrey Law Firm has “adopted” the school and provides school supplies and volunteer time. Students from a college preparatory school, provide tutoring. Kluge is the creative arts specialty school for MPS’ northwest region, offering families a rigorous academic program. The school provides 15:1 student-to-teacher ratios in our K5-through-3rd-grade classes. The computer lab, mobile laptop lab, iPads and smart boards ensure that Kluge students are connected to the technology they need to succeed. Kluge offers its students specialist-taught art classes and activities. Kluge also offers tutoring for students, a Junior Achievement program and has connections with college education majors from UW-Milwaukee, Alverno and Cardinal Stritch University.

Banner Preparatory School, due to the small number of students, is not ranked and is a partnership school (alternative school) for high school students that are assigned from the MPS system, with the goal of giving students another chance to succeed. Banner is a member of the National Network of Partnership Schools and draws students from all over the city (only 6 students last year came from Westlawn). One sign of its success is its low repeat rate (students are typically only enrolled there for a semester to two years). Due to the nature of its student base, staff at Banner deal with many issues of family violence, court involvement, homelessness and other issues that can disrupt learning. Banner staff work closely with students and families to develop learning plans, complete with cooperatively developed goals. It uses a blended learning model that includes online learning as well as face-to-face instruction. Browning and Banner Prep especially benefit from their relationship with SSNC: In 2004, MPS worked with HACM and SSNC to relocate Browning from an older building on to a new facility connected with the SSNC in the middle of the Westlawn housing development. This move was a win-win partnership, as MPS was able to partner with a strong existing neighborhood organization, and Browning parents and students could take advantage of wraparound services provided by SSNC.

In 2013, MPS administration and Board of Directors decided to replace a consistently low performing school located four blocks from the Westlawn development, with a high quality and high performing MPS charter middle/high school: Carmen Northwest Middle/High School for Science and Technology. Since 2007, Carmen has run a very successful high school on the south side of Milwaukee and MPS wanted to replicate this successful school in the Westlawn area. Carmen South's success is detailed in Exhibit C.5, but Carmen Northwest's success in its brief existence is noteworthy as well. During its first year (2013-14), Carmen Northwest had enrollment of 219 students in 6<sup>th</sup> and 8<sup>th</sup> and 9<sup>th</sup> grades with 20% of middle and 13.5% of high school students with special educational needs. Enrollment will be phased in over four years, with classes added each year

until 240 students are enrolled in grades 6-8 and 560 students are enrolled in grades 9-12. Middle school students take a curriculum that focuses on reading, writing, and speaking; global studies and US History; laboratory science; mathematics through Algebra; and fine arts. High school students must take four years of college preparatory classes with the ability to also take advanced placement courses. Carmen's mission is to ensure all students: (1) take college prep courses in high school; (2) become critical thinkers; (3) graduate from college; (4) prepare for meaningful careers; and (5) get involved in their communities. Carmen helps students develop critical thinking and life skills and apply them in academic courses and "real world" settings, and students who consistently perform at or above a 2.5 GPA are eligible for internships at partner companies. In this first year, students at Carmen Northwest showed growth in the NWEA Measure of Academic Progress for math at 228% compared to 124% for MPS students overall, with reading at 199% compared to 117% for MPS students overall. The 9<sup>th</sup> grade students exceeded national composite score growth rates on the ACT Explore test by nearly double (1.9 vs. 1.1 points). One point growth is roughly equivalent to one year of growth, thus those students showed almost two years of growth during this first year..

**Outreach, Enrollment and Parental Involvement:** MPS is committed to increasing parental engagement with resources to guide parent engagement strategies and activities, tips for helping to increase student achievement and supporting children at home, and Parent Coordinators at each school. HACM will expand its successful Education Initiative to the families in Westlawn. Parents will sign a lease addendum that they will agree to ensure their children are attending school on time every day and get involved with their child's education. HACM's Case Managers will work with parents and children to increase school attendance in high quality schools and develop strategies together with parents and children to improve educational outcomes. In addition, Case Managers will help parents enroll their children in Community Learning Centers (CLCs) and/or to receive tutoring services that may be available under No Child Left Behind. CLCs are located at school or community

sites and provide a safe place for tutoring, assistance with homework, recreational activities, and art/cultural programs. The Education Initiative was previously piloted in the Highland and Scattered Sites developments, with the powerful result that 100% of the children in the program stayed enrolled in school and, in the past 5 years, between 88% and 100% of 18 year olds have graduated.

**Access beyond the Grant Period:** MPS and all the partners involved in education are committed to continue to provide access to high quality schools beyond the five-year period of this grant. HACM’s intends to sustain the Education Initiative at Westlawn beyond the Choice grant, just as we did at Highland and Scattered Sites. The relationships and improvement of the local schools (such as the addition of Carmen) will also be sustained through continued partnership between MPS and HACM beyond the grant period.

<b>Outcomes</b>	<ul style="list-style-type: none"> <li>• <b>Children are proficient in core academic subjects</b></li> <li>• <b>Youth, including youth with disabilities, graduate from high school college- and career-ready</b></li> </ul>
<b>Metrics</b>	<ul style="list-style-type: none"> <li>• Number and % of students at or above grade level according to state math and English language arts assessments in at least the grades required by the ESEA (3<sup>rd</sup> through 8<sup>th</sup> grade and once in high school).</li> <li>• Number and % of youth who graduate from high school.</li> </ul>
<b>Needs Assessment Baseline</b>	<ul style="list-style-type: none"> <li>• See chart above: Only between 3 and 17% of children in Westlawn area elementary schools scored proficient or advanced.</li> <li>• Citywide high school graduation rate was 60.5% (four year) and 70.8% (five year); specific rate for Westlawn children is not known.</li> </ul>
<b>Projected Results</b>	<ul style="list-style-type: none"> <li>• 65 % of students at or above grade level according to state math and English language arts assessments in at least the grades required by the</li> </ul>

	<p>ESEA (3<sup>rd</sup> through 8<sup>th</sup> grade and once in high school).</p> <ul style="list-style-type: none"> <li>• 85% of all Westlawn youth of age will graduate from high school.</li> </ul>
<b>Strategies</b>	<ol style="list-style-type: none"> <li>1. Case Managers will link families to high quality schools and work with them to implement HACM's Education Initiative and to improve their children's school performance.</li> <li>2. MPS will ensure high quality schools for the neighborhood.</li> </ol>
<b>Residents Served</b>	<ol style="list-style-type: none"> <li>1. 336 school aged children in the Westlawn development</li> <li>2. 1794 students enrolled in five schools in the Choice Neighborhood</li> </ol>
<b>Service Provider(s)</b>	<p>MPS, Banner Preparatory School, Silver Spring Neighborhood Center, Day Care Services for Children, Carmen Northwest, and HACM</p>
<b>Resource Commitments</b>	<p>Choice Neighborhood Funds: \$1,247,500 – Leveraged funds: \$21,811</p> <p>Major leverage commitments include over \$200,000 from Carmen Schools and more than \$21,000 from MPS. Much of the strategy involves leveraging the new high-quality services from Carmen and the work that is already underway at the neighborhood MPS schools on school improvement. The commitments directly address the needs identified in the needs assessment for improved schools and the need for a quality neighborhood education track from ECE to elementary to middle/high to college or career.</p>

**c. Promise Neighborhoods:** The Westlawn target neighborhood is not currently the focus area of a Promise Neighborhood grant.

**H.6 Economic Opportunities for Low- and Very Low-Income Persons (Section 3)**

(a) **Section 3 Plan.** In September 2013, HUD's review of HACM's Section 3 compliance found that while HACM had made significant efforts in good faith to comply with Section 3, there were still some compliance issues related to the implementation of Section 3. In August 2014, HACM entered

into a Voluntary Compliance Agreement with HUD to improve its Section 3 Plan, procedures and improve results. The draft plan has been completed including strong compliance procedures and policy, and was sent to HUD on 2/4/2015 for review and approval.

**I. Types/amounts of employment/training/contracting to be generated.**

- **New Hires:** HACM commits to a minimum of 30% of new hires for construction contracts.

HACM estimates that the remaining construction at Westlawn could result in at least 76 new Section 3 workers: General Laborers—45; Painters/Drywallers—10; Carpenters—10; Masonry—5; Plumbers—5; Electricians—1.

- **Training:** Through its partnerships with training programs such as Milwaukee Community Service Corps and Wisconsin Regional Training Partnership/Big Step, HACM has a goal of at least 10 Section 3 individuals trained in construction training during the grant period.
- **Contracting with Section 3 businesses:** Based on recent experience, HACM believes that it will be able to contract at least 12%, or about \$3 million, with Section 3 businesses.

**ii. Specific actions giving priority to Section 3 persons/businesses.** HACM gives written notification about Section 3 to all vendors, contractors, and social service providers. At pre-bid conferences, information is provided about Section 3 requirements and compliance with Section 3 goals is part of the bid package and contract. HACM staff meet with contractors to discuss Section 3, contractors prepare a Section 3 Action Plan prior to the award of any contract, and HACM closely monitors compliance during the life of the contract. HACM also provides contractors with a list of Section 3 businesses. HACM also provides technical assistance and training to residents in starting businesses, and gives priority to these businesses for contracts.

**iii. Eligibility criteria for certifying Section 3 residents/businesses.** HACM uses a standard form for businesses to self-certify that they meet requirements to be a Section 3 business concern. HACM then follows up with questions to the owner/executive of the business to ensure that they

understand the definition and that they meet the requirements. HACM currently has a list of 45-50 Section 3 businesses and will also be starting a Section 3 Resident Listing including resident skills/experience and contact information to share with contractors. HACM is also collaborating with the City on its online Section 3 self-certification for businesses.

**iv. Notification process about training, employment, and contracting opportunities:** HACM helps to link public housing residents and other Section 3 persons with training and employment opportunities whenever possible and does significant outreach to residents to notify them about the availability opportunities through monthly resident meetings, quarterly newsletters, and through Case Managers. One component of HACM's workforce development plan uses organizations like the Milwaukee Community Services Corps (MCSC) or Northcott Neighborhood House to provide training and job opportunities for youth aged 16-24 who are interested in construction work but who lack job experience. HACM also leverages training through community resources, such as the Milwaukee Area Workforce Investment Board, Wisconsin Regional Training Partnership/Big Step, and the Milwaukee Area Technical College.

**v. Monitoring contractors for Section 3 compliance.** HACM's Section 3 Coordinator will monitor compliance with Section 3 requirements during the life of the contract. Contractors and subcontractors are required to report to HACM any new hires and names of Section 3 residents employed. HACM then evaluates progress and determines if changes are needed.

**vi. Strategies for meeting the Section 3 goals.** HACM is a partner with the Milwaukee Area Workforce Investment Board on a successful FY2014 Youthbuild grant, and will have a Youthbuild crew made up of primarily public housing young adults. HACM's goal is to get enough residents in the construction trades training pipeline that we will have qualified individuals ready to go once any construction related to this grant begins. HACM's revised Section 3 policy includes strong enforcement requirements intended to ensure that contractors meet or exceed the minimum Section 3

goals on contracting and hiring. For example, when hiring, contractors and subcontractors must perform outreach and if a Section 3 resident is not hired the employer is required to so justify in writing.

**vii. Section 3 staff contact information and qualifications.** HACM's Section 3 Coordinator is Evans Gant. Prior to joining HACM, Gant had two years of previous experience as a Housing Program Analyst for the Milwaukee County Community Development Block Grant office, working in the area of construction bids, compliance with labor and wage requirements, and Section 3. Contact information: 650 W. Reservoir Ave., Milwaukee, WI 53212. The phone number is (414) 286-2940 and email address is [evgant@hacm.org](mailto:evgant@hacm.org).

**(b) Section 3 Compliance:** Although HUD's Section 3 Summary Reporting system continues to be unavailable due to technical problems, HACM continues to maintain applicable records and supporting materials once the system becomes available.

HACM has already amassed an enviable record of excellence among the nation's public housing authorities for sponsoring life enhancing service programs for its residents using operating as well as special grant funds. It is our intent, with the assistance of our partners, to utilize CNI grant funds awarded to us to open many new and exciting opportunities for community residents to strive for and achieve better. As we have demonstrated in the forgoing pages, this grant will be the tide that floats all community "boats." At the end of the day, that objective has to be at the top of the list of lofty ideals and outcomes for which CNI was created in the first place.