

FY 2023

CITY OF MOORE

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

(CAPER)



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www.cityofmoore.com

CR-05 – Goals and Outcomes

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

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

The City of Moore is carrying out activities funded by the Community Development Block Grant (CDBG) program in a manner consistent with the certifications required as part of the Consolidated Plan. The City of Moore continues to implement the goals and objectives identified in the five year consolidated plan to achieve development of a viable urban community. In the 2023 Action Plan, the City identified a total of eight public service activities, one fair housing activity, one public infrastructure improvement activity, and an emergency repair program that was funded during the 2023-2024 program year.

The activities proposed in the 2023 Action Plan included:

- **Aging Services, Inc.** was awarded funding to provide home bound Moore senior citizens with hot delivered meals.
- **Bethesda, Inc.** was awarded funding to provide counseling services to sexually abused children and their non-offending caregiver.
- **Mary Abbott Children’s House** was awarded funding to provide a forensic interview program to abused children.
- **Metropolitan Fair Housing Council of Oklahoma, Inc.** was awarded funding to provide landlord tenant counseling and fair housing education services.
- **Moore Youth and Family Services, Inc.** was awarded funding to provide a pre-intervention program to students in Moore Public School system.
- **Moore Youth and Family Services, Inc.** was awarded funding to provide counseling services to first time offenders for Moore youth.
- **St. Vincent de Paul** was awarded funding for a utility and rental assistance program.
- **Southgate Sewer Replacement** was the public infrastructure activity. Construction was completed.

The City of Moore was awarded funding from the CARES Act through Community Development Block Grant Coronavirus (CDBG-CV) funds. Multiple public service organizations were consulted as well as the CDBG Advisory Committee. The following activities were completed this program year with CDBG-CV funding:

- **The Virtue Center** was awarded funding to provide outpatient treatment for substance use disorders, problem gambling, and co-occurring mental health challenges.

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

Categories, priority levels, funding sources² and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Category	Source/ Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Goal: Administration/Planning									
Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities Other Than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		64	64	100.00%
Goal: Administration/Planning									
Affordable Housing Non-Housing Community Development	CDBG: \$	Public Service Activities Other Than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		588	707	120.24%
Goal: Administration/Planning									

Affordable Housing Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		8	4	50.00%
Goal: Affordable Housing									
Affordable Housing		Rental Units Constructed	Household Housing Unit	244	220	90.16%			
Goal: Community Development									
Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities Other Than Low/Moderate Income Housing Benefit	Persons Assisted	2,000	2,000	100.00%	64	64	100.00%
Goal: Community Development									
Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	4	16.00%			
Goal: Housing Rehabilitation									
Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	15	4	26.675	8	4	50.00%
Goal: Public Services									
Non-Housing Community Development	CDBG: \$	Public Services Activities Other Than Low/Moderate Income Housing Benefit	Persons Assisted	1,500	7,848	523.20%	570	707	124.04%
Goal: Public Services									
Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	25	591	2,364.00%			

Table 1: Accomplishments – Program Year & Strategic Plan to Date

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

The City of Moore strives to implement its 5-year Consolidated Plan priorities and objectives, which was developed through input from agencies, the public, and focused on programs that can be recommended to meet underserved needs. During the funding year, the City continued its strategy of investing the majority of CDBG funds on a citywide basis to activities that demonstrate significant leveraging of limited CDBG resources while benefiting low to moderate-income persons both directly and through community growth.

The City of Moore continually pursues other grant funding to address the needs of our low to moderate income residents.

CR-10 – Racial and Ethnic Composition of Families Assisted

Describe the families assisted (including the racial and ethnic status of families assisted) 91.520(a)

Race/Ethnicity	CDBG
White	470
Black or African American	52
Asian	11
American Indian or Alaskan Native	60
Native Hawaiian or Other Pacific Islander	0
Total	593
Hispanic	46
Non-Hispanic	668

Table 2: Table of Assistance to Racial and Ethnic Populations by Source of Funds

Narrative

The above table did not include the following racial/ethnic status of individuals assisted:

- Asian & White: 1
- Black or African American & White: 10
- Hispanic or Latino Only: 39
- White & Hispanic or Latino: 7
- Other Multi-Racial: 60

CDBG Entitlement funds assisted a total of 672 individuals and the CDBG-COVID-19 funds assisted 42.

The above information include numbers for both the CDBG Entitlement Program and CDBG-COVID-19 Program for the 2023 program year.

CR-15 – Resources and Investments 91.520(a)

Identify the resources made available.

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	Public – Federal	457,260	532,069

Table 3: Resources Made Available

Narrative

The total amount of resources made available for the 2023 program year consists of:

CDBG-CV Remaining Unallocated Funds:	\$75,687.64
2022 CDBG Remaining Unallocated Funds:	\$37,755.63
2023 CDBG Allocation:	\$343,817.00
Total Available for PY 2023:	\$457,260.27

The amount expended during the 2023 program year consists of final draws for 2022 activities, CDBG-CV activities and 2023 activities.

CDBG-CV Expenditures:	\$10,391.58
2022 Expenditures:	\$217,134.88
2023 Expenditures:	\$304,542.16
Total Expended in PY 2023:	\$532,068.62

Identify the geographic distribution and location of investments.

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Armstrong			
City Wide	43	36	
Crestmoore			
Kings Manor			
Lockhoma Estates			
Old Town/High School Addition			
Regency Park			
Skyview Terrace/Newmoore			
Southgate	57	56	Consisted of the sewer replacement activity.
Sunnylane Acres			

Table 4: Identify the Geographic Distribution and Location of Investments

Narrative

Public Services, administration, and planning activities are available to residence city wide. The sewer rehabilitation activity was located in the Southgate target area.

The amount of unallocated funding remaining from the 2023 program year is \$24,337.86 that will be rolled over into the 2024 program year budget.

Leveraging

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

Utilizing information gathered from consultation with the CDBG Advisory Committee, City departments, City management, and the general public, public needs are identified. By providing this list of identified projects, the CDBG Advisory Committee and the City Council prioritize the projects and these projects are approved as additional funding is available. The City’s General fund provides funding for engineering services and acquisition costs for public improvement projects. The City of Moore continues to seek additional funding from local, state, and federal resources to maximize the effectiveness of CDBG funds.

CR-20 – Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	20	14
Number of Special-Needs households to be provided affordable housing units	0	0
Total	20	14

Table 11: Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	12	1
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	8	4
Number of households supported through Acquisition of Existing Units	0	0
Total	20	5

Table 12: Number of Households Supported

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

The City of Moore’s 5-Year Consolidated Plan recognized that the City’s CDBG allocation is inadequate to address housing needs directly, but instead rely upon public service agencies to provide needed housing services. The City funded a rental and utility assistance program and an emergency home repair program. Although the rental and utility assistance program helped 14 households total, only 1 household received rental assistance. The City has funded a rapid rehousing program and a rental and utility assistance program for the 2024 program year in hopes to see these numbers increase.

Discuss how these outcomes will impact future annual action plans.

The City sees the need for housing assistance in its community. In the 2024 program year, it has funded a rapid rehousing program and a rental and utility assistance program. The City has also funded through its general fund an emergency home repair program.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-Income	14	0
Low-Income	0	0
Moderate-Income	0	0

Total	14	0
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Table 13: Number of Households Served

Narrative Information

The table above includes household data for households who received rental or utility assistance. The City of Moore will continue its commitment to create diverse housing opportunities and ensure the availability and affordability of a variety of housing by collaborating with the development of community and housing organizations to build affordable housing in the community and programs that assist with low-income families in preventing homelessness.

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

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

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

The City of Moore is continuing in its efforts of reaching out to homeless persons. A partnership has been established between City of Moore staff, police officers, and a local pastor. If police officers come across any unsheltered persons, contact is made with the pastor. The pastor locates the unsheltered persons and provides them transportation to the emergency shelter in Norman. City staff attend monthly meetings with the Cleveland County Continuum of Care (CoC). With the CoC’s guidance, Moore is now reaching out to its homeless in a more effective and positive way. When contact is made with any homeless individuals, as much information about the individual is gathered and a Release of Information form is completed. With this information, homeless individuals are connected with the best resources to assist them with their situation.

The City is working on growing this partnership. Most, if not all, resources for homeless individuals are located in Norman. The City of Moore determined the quickest and best assistance it can give homeless persons is transportation to these services. The City is working toward establishing a coalition that could progress the outreach to homeless persons in Moore.

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

There is one year-round emergency shelter for all of Cleveland County, located in Norman. Individuals who stay in the emergency shelters are screening using the VI-SPDAT at intake for program eligibility and to determine the level of assistance needed. Intake staff provides connections to resources such as employments services and food resources to help stabilize basic needs. Intake staff also coordinate limited resources with the CoC. The CoC has a system to increase coordination and avoid duplication of services.

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

The City of Moore does not have any publicly funded institutions within its city limits. However, with partnerships strengthening between City of Moore staff, the Moore community, and the Cleveland County Continuum of Care, Moore is more familiar with resources for the homeless now more than ever. A local pastor is our acting Coordinated Case Manager for any homeless individuals in Moore. They work closely with the CoC and coordinates with the appropriate agencies best suited to assist.

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

In order for formerly homeless individuals to remain housed long-term, it is imperative they have a reliable income from employment or from benefit programs. Case managers in emergency, transitional, and permanent supportive housing programs determine eligibility for mainstream benefit programs and support clients in the enrollment process. This includes gathering documents such as; driver’s license or identification cards, birth certificates and Social Security. The case manager will assist with completing application

forms, and scheduling initial appointments. Clients are then given referral packets to each program they are eligible, including addresses and directions to the benefits office, transportation details, and program information sheets.

In the past the City of Moore has lacked case managers for the homeless. The established partnership with the local pastor has identified a case manager for Moore. As the initial contact for the homeless, the pastor will become the case manager for these individuals to coordinate and determine what assistance is needed. The homeless liaison for the public school system facilitates housing options for homeless families. With the planned rapid rehousing program the City is currently planning, the period of time that individuals or families experience homelessness will shorten or will be prevented entirely.

CR-30 – Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing.

The City of Moore continues its commitment to create diverse housing opportunities and ensure the availability and affordability of a variety of housing by collaborating with the development of community and housing organizations to build affordable housing the community. The Curve, the affordable housing development that was subsidized with the City's CDBG-DR funds, has obtained 100% occupancy.

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

The City of Moore does not have any public housing.

Actions taken to provide assistance to troubled PHAs.

The City of Moore does not have any public housing.

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

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

The City continues to evaluate the building codes, zoning ordinances, and land usage. Because of continued evaluation, this has allowed the City to change growth limitations and encourage citizens to build homes in Moore.

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

The City of Moore strives to implement its 5-Year Consolidated Plan priorities and objectives, which was developed through input from agencies, the public, and focused on programs that meet underserved needs. During the funding year, the City continued its strategy of investing the majority of CDBG funds on a citywide basis to activities that demonstrate significant leveraging of limited CDBG resources while benefiting low- to moderate-income persons both directly and through community growth.

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

The City of Moore initiated a housing rehabilitation program during this CDBG program year. The City acknowledges lead hazard reduction and abatement as an important component of the city's future rehabilitation programs. Programs that provide rehabilitation/repair to owner occupied homes where painted surfaces would be impacted, require inspections of each house built prior to 1978 for lead based paint (LBP) hazards using a Certified LBP inspector or risk assessor for compliance with HUD's Lead-Safe Housing Rule. City staff will pursue educational opportunities for lead based pain training, educating contractors of the requirements and needed training, and working to identify additional funds sources to address this issue.

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

The City of Moore continues to promote efforts that incorporate supportive services to assist extremely low- and low-income residents to achieve self-sufficiency. The City also encourages applications from non-profit agencies for programs that are directed toward extremely low-, low- and moderate-income individuals.

Actions taken to develop institutional structure 91.2209k); 91.320(j)

The City coordinates with the Metropolitan Fair Housing Council of Oklahoma to help provide educational and information services of fair housing issues to its residents. These services include tenant/ landlord counseling and mediation, eviction prevention and/or legal intervention.

The City of Moore works closely with several agencies to develop partnerships to identify and respond to developing needs in Moore.

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

The City of Moore encourages agencies to partner with each other. City of Moore staff makes diligent efforts in establishing relationships with all types of organizations. With established relationships, the City can help facilitate important partnerships between organizations to best serve the community. Partnerships with non-profit agencies that serve Moore residents is necessary to meet the housing and supportive service needs of the public. Staff from the City participate in the Coordinated Case Management Conference Call hosted by the CoC every week. This weekly conference assists all homeless service providers in Cleveland County with the case management of the homeless or individuals/families who are on the verge of becoming homeless.

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

In the City of Moore's 2020 Analysis of Impediments to Fair Housing Choice, it was found that the City needs increased accessibility to affordable housing and identified a lack of affordable housing organizations and partners. With the CDBG-DR funding, the City was able to subsidize a mixed-use, mixed income multi-family development called The Curve. This development has both affordable units as well as market rate units, with all units being identical. Out of the 244 residential units, at least 220 are to remain affordable. It was also found there is a limited supply of housing for persons with disabilities. Within The Curve, 5% of all units are mobility accessible and 2% of all units are sensory accessible. Units that are sensory accessible will not be the same units as those that are mobility accessible.

The analysis also identified a lack of public transportation infrastructure. The City has completed a Public Transportation Feasibility Study. The study established how big a need there is in Moore for public transportation, what kind of public transportation would best fit the need identified, and how to administer a public transportation program. The City is currently looking into funding options. Moore also took part in EMBARK's bus study to include Moore in future route expansions.

The analysis also found Moore has limited housing types, affordable options, and no transitional housing or homeless housing. Currently, Moore does not receive HUD funding for special housing for the homeless population, nor does the city have a temporary housing program.

The City of Moore will continue its commitment to create diverse housing opportunities and ensure the availability and affordability by collaborating with community and housing organizations to build affordable housing in the community.

CR-40 – Monitoring 91.220 and 91.230

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

Monitoring is conducted in a manner consistent with the HUD regulatory guidelines that apply to CDBG funds. Depending on the nature of the funds usage, different eligibility and compliance factors may be reviewed. City staff keeps continuous contact with subrecipients during the duration of the project. Annual monitoring is completed. For projects following Davis-Bacon requirements, City staff meets with subrecipients before any bids are solicited and with contractors before any work can begin. To assist with monitoring, City staff follows HUD developed guidelines and a subrecipient monitoring checklist. The checklist ensures that consistency is provided during a monitoring visit and allows subrecipients the ability to know what will be expected during a visit.

The City takes a proactive approach rather than reactive to ensure timeliness and compliance from subrecipients and contractors. The implemented strategy includes a pre-application workshop for all applicants prior to submitting an application for funding. This workshop provides reporting and documentation requirements as well as eligible and ineligible costs. City staff conducts on-site visit to all successful applicants to complete and initial assessment of their capacities, their program, and service environment to determine the frequency of City staff monitoring. Because the City's CDBG program operates on a reimbursement basis, City staff is able to closely monitor the expenditures of each subrecipient to ensure that all expenses are eligible for reimbursement, subrecipient beneficiary reporting is a condition for cost reimbursement.

City staff has generally found that programs and projects are operating according to the regulations and the terms and conditions of agreements. The City of Moore focuses on areas of eligibility of beneficiaries and expenditures. Overall, programs and projects have a good record, especially given that funds are disbursed on a reimbursement basis, with source documents reviewed prior to approval. City staff works closely with all subrecipients and contractors and maintains close working relationships to ensure all work is completed according to CDBG regulations and contract requirements. This also allows for City staff to determine areas of concern with each subrecipient, in addition to areas where enhanced guidance may be needed with future contracts.

All CDBG programs are focused on meeting the needs of low/moderate income households and individuals. Without CDBG funding, many of the programs would be unable to assist as many people and some may not continue to exist. Throughout the funding cycle and awarding of CDBG funds, the City works towards directing funding to projects that meet the goals and objectives in the consolidated plan. During the 2023 funding cycle, projects funded addressed high priorities (senior services, child care services, abused and neglected children, program administration, and fair housing activities). Through the CDBG program, local non-profit organizations were able to provide enhanced and expanded services for the community.

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

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

Public notices for the 2023 Consolidated Annual Performance Evaluation Report (CAPER) were published in The Oklahoman and the El Nacional de Oklahoma newspapers. The Public notice was also posted at the Moore Public Library, the Brand Senior Center, and the City's website, www.cityofmoore.com. The draft CAPER can be viewed on the City of Moore website or in persons in the Community Development department at Moore City Hall, 301 N. Broadway, Moore, OK 73160. Public comments on the CAPER will be accepted from October 31, 2024 through December 2, 2024. The City directs comments to be submitted in writing to Kahley Gilbert at 301 N. Broadway, Moore, OK 73160 or by calling (405) 793-4571. The draft CAPER will be presented to the CDBG Advisory Committee on November 14, 2024 and the meeting will be open to the public for comment. No comments have been received yet. The draft CAPER will be presented to the City Council on December 2, 2024 and all comments are welcome from the public during the hearing. Citizens are provided the option of attending the public hearing and providing comments virtually via Zoom with prior request. Citizens were asked to contact the Community Development department to make arrangements.

The City of Moore encourages participation from all its citizens. If participation at any public meeting is not possible due to a disability (such as a hearing or speech disability) or a language barrier, notification to the City Clerk at least forty-eight (48) hours prior to the scheduled public meeting is encouraged to allow the City to make the necessary accommodations.

Requests for the draft CAPER or related documents in alternate formats consistent with provisions of federal requirements related to limited English proficiency are directed to the Community Development department. Public notice is published in Spanish in the El Nacional de Oklahoma newspaper and on the City of Moore website, www.cityofmoore.com.

CR-45 – CDBG 91.520(c)

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

There were no changes.

Does the jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No.

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

N/A

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	2,200	0	0	0	0
Total Section 3 Worker Hours	1,716	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	0

Table 15: Total Labor Hours

Qualitative Efforts – Number of Activities by Program.	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers.					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the-job training (including apprenticeships).	1				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	1				
Technical assistance to help Section 3 workers compete for jobs (e.g. resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the State one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

Table 16: Qualitative Efforts – Number of Activities by Program

Narrative

These Section 3 hours are from the Southgate Sewer Rehabilitation activity.