



FY 2021

Consolidated Annual Performance and Evaluation Report (CAPER)

PUBLIC DISPLAY PERIOD: November 22-December 7, 2022

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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 Staunton CDBG Program offered comprehensive assistance to extremely low, very low and low-income persons and families with a variety of housing opportunities, public infrastructure and social services. In Program Year 2019, the City of Staunton was designated a federal entitlement community.

The Re-Roofing Staunton project continues to engage stakeholders in working collaboratively to re-roof homes throughout Staunton. The two homes for which contracts were signed last quarter have been completed and passed inspection. Two additional applicants were identified at the end of the quarter. The program continues to move forward, albeit slowly. Identifying contractors has been a challenge, and the costs of materials have impacted the program. Homeowners are still reluctant to have contractors at the home due to the pandemic.

Blue Ridge Legal Services Inc. (BRLS) provided free legal services to 21 low-income Staunton residents facing critical civil legal issues during FY 2021. These cases included 7 involving subsidized housing; 13 involving private landlord-tenant matters; and 1 involving housing problem by a homeowner. Of these 21 cases, 14 were new cases opened during the 2021 grant year. Of the 21 cases, 17 of them closed during the grant year, while the remaining 4 are pending and will be carried over into the next grant year.

During the third quart of FY 2021, the City of Staunton CDBG funding was used to pay for initial housing support for a total of three exiting Valley Mission clients.

In 2021, the Senior Transportation Program (STP) continued to provide elderly Staunton residents and those under 60 with a disability transportation services to medical and other life-necessary destinations where there is no other reliable or affordable transportation option available to them. In addition, the Meals on Wheels (MOW) program continued to provide a nutritious hot meal five days per week to frail, older Staunton residents who are at nutritional risk.

In 2021, as Coronavirus continues to affect the project objectives, Blue Ridge CASA continues to have potential volunteers who have placed their volunteering or their application on hold due to pandemic-related safety concerns. Regardless, CASA conducted an Advocate Training Class, hired a new Director of Programs, and hired an additional advocate manager who will spend part of her time serving children in Staunton/Augusta/Waynesboro. CASA is at 75% of total goals for the year.

Site prep and planning continues on the A Street Aging in Place project, which is in final design with a submission to the City planning commission in November 2022. Infrastructure work will be bid late Winter, and completed in Spring 2023. The City awarded the bid for the Rockway waterline project in July 2022 and work progresses with expected completion during the 2022 program year. Sewer infrastructure below the proposed Beverley Street sidewalk project location may need to be replaced. Regardless, the City plans to bid the project in program year 2022 with a completion in 2023.

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

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of

measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Economic Development	Non-Housing Community Development		Businesses assisted	Businesses Assisted	5	0	0.00%	0	0	
Improve Access to and Quality of Housing	Affordable Housing Public Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	8		8	8	100%
Improve Access to and Quality of Housing	Affordable Housing Public Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	4	8.00%	3	2	66.67%
Improve Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5580	0	0.00%	541	0	0.00%
Improve Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0	0	0	
Planning and Administration	Non-Housing Community Development	CDBG: \$	Other	Other	1	1	100.00%	1	1	100.00%

Provide Public Services	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	595	1,503	252.61%	197	222	114%
Provide Public Services	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	29		5	7	140.00%
Provide Public Services	Homeless Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0	0	0	0	0

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.

During FY 2021 the City of Staunton completed the following activities that were considered high priority

- Persons benefiting from Public Services: 230 persons served, of those were:
 - 17 low-income Staunton residents facing critical civil legal issues benefited from free legal service.
 - 7 clients exiting Valley Mission received initial housing support
 - 37 Staunton residents age 62 or older who did not have access to other forms of transportation received benefited from transportation services to medical and other life necessary destinations
 - 122 seniors or persons with disabilities benefited from the Meals on Wheels program
 - Approximately 46 youth were assisted with advocacy services
- Housing Units identified for rehabilitation/completed rehabilitation: 2 homes identified/2 homes completed and passed inspection.

In 2021, the City of Staunton continued to utilize CARES Act funding for the prevention of, and response to Coronavirus. The City of Staunton continues to expend CARES Act funds in 2021 to address the following objectives:

- Providing emergency payments for rental, mortgage and utility assistance to low- to moderate-income households. 44 households received this type of assistance in 2021.
- Provide funding for additional emergency shelter staffing due to the increased shelter space needs resulting from social distancing. Valley Mission previously expended funds and was awarded additional funding in September 2022.
- Increase outreach and education to underserved populations to provide prevention messaging in socially vulnerable areas, as identified by CDC social vulnerability index maps of the City. The Central Shenandoah Health District returned their unspent CDBG-CV funds, which the City will reallocate to other activities to respond to the pandemic.
- Providing legal aid services to persons at risk of homelessness as a result of COVID-19 to low- and moderate-income households facing evictions. 6 households were assisted.
- CDBG CV Program Administration.

Additional CDBG-CV funding was awarded to VPAS for test kits to be distributed to the elderly and disabled receiving Meals on Wheels delivery. The City is currently reviewing its remaining

unmet needs related to its response to COVID-19 and will reallocate CDBG-CV resources as necessary. 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)

	CDBG
White	235
Black or African American	54
Asian	0
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	0
Total	290
Hispanic	39
Not Hispanic	251

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

Narrative

Not shown in the above table are the 21 multi-racial individuals (all Not Hispanic) that also benefited from the CDBG programs.

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	344,362	
Other	public - federal	0	

Table 3 - Resources Made Available

Narrative

The City of Staunton has utilized \$133,248.68 of its total CDBG budget. The City plans to expend the remaining 2021 funds in 2022.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City-Wide	100		

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City did not target funding to specific neighborhoods. The City as a whole is the target area for funding. Activities were planned and carried out in low-income areas of the City, or public service activities that benefit primarily LMI persons.

Leveraging

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

The City of Staunton leveraged its CDBG allocations with federal and other public resources, as well as private sector funding sources, to address the City's housing and community development needs. The City partners with other public agencies and nonprofit organizations, to leverage resources and maximize outcomes in providing the housing and supportive services needs of the community.

The City provides general fund dollars to organizations that provide housing and/or supportive services to area residents, including LMI households. The City will continue this practice to maximize its CDBG investments. The nonprofit organizations funded through the CDBG program have additional financial capacity through foundations, fundraising campaigns, and other grants. The City's allocation of federal funds provides these organizations with the opportunity to expand their services to benefit more low- and moderate-income persons.

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	5	9
Number of Non-Homeless households to be provided affordable housing units	3	0
Number of Special-Needs households to be provided affordable housing units	0	8
Total	8	17

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	5	7
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	3	10
Number of households supported through Acquisition of Existing Units	0	0
Total	8	17

Table 6 – Number of Households Supported

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

The City of Staunton anticipates providing housing rehabilitation for 50 units over a five-year period, and has completed 4 and identified 2 more for rehabilitation. Due to the pandemic, the demand for the program was diminished, so outcomes for the past three years are much lower than expected.

In 2021, 7 clients experiencing homelessness were assisted with security deposit and/or first month's rent to move into permanent housing.

Discuss how these outcomes will impact future annual action plans.

Outcomes not achieved in the 2021 Program Year will be reported in future years. The City does not anticipate a need to amend future actions plans to adjust its goals or priority needs. Projected outcomes may be reduced due to current demand for programs and services. The City of Staunton continues to provide training and technical assistance to partner agencies in order to

ensure efficient service to Staunton residents. The City has procured consultants to assist in the program implementation of the CDBG program and has recently hired staff to assist with the CDBG 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	0	0
Low-income	2	0
Moderate-income	0	0
Total	2	0

Table 7 – Number of Households Served

Narrative Information

CDBG funds were used to fund public services that are directed to seniors, youth, disabled populations, and persons who are homeless and are thus presumed to serve low-income people. The City's rehab program collects direct benefit information, which is reported above. The City is not a HOME grantee.

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 Balance of State Continuum of Care (BoS CoC) continues to operate the Coordinated Entry System, which offers a central point of entry for households experiencing homelessness or at-risk of homelessness. During an initial phone call, a housing counselor will ask questions that help determine eligibility for services with local agencies. The BoS CoC uses two assessment tools for prioritization of services. Prevention assessment: The BoS created a prevention prioritization tool that includes both homeless vulnerability and housing barriers. Once a household's housing crisis is triaged and it is determined that the household is at imminent risk of homelessness (14 days or less), then the coordinated entry staff will conduct the prevention prioritization assessment. Based on eligibility and assessment score prevention, providers are guided on service needs of households. The BoS CoC uses the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common standardized assessment tool for those who are literally homeless. This assessment is conducted no more than 3 to 5 days after the household has been referred to shelter, or once an outreach worker is able to establish rapport with an unsheltered or unengaged household.

Staunton's continued participation in the PIT gives the City the ability to collect information to be used in setting priorities, written standards, and performance measures for the area.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2021, the City's federal funds were used to support the Valley Mission and Valley Supportive Housing Program. The former offers emergency shelter and services for homeless individuals and families while the latter provides permanent supportive housing and wraparound services for the same population.

The City of Staunton also allocated CARES funding for the operation of a temporary emergency shelter during the pandemic. A substantial amendment in late program year 2021 allocated additional operational support to Valley Mission for their efforts to prevent the spread of coronavirus within the shelter.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities,

mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City coordinated and collaborated with local non-profit agencies serving the homeless population.

During 2021, the City awarded CDBG funds to Valley Mission for the use of financial and utility assistance for low- to moderate-income households exiting transitional housing or emergency shelters.

As part of the CARES Act funding, the City of Staunton allocated funds to Community Foundation of Blue Ridge and the Salvation Army for subsistence payments that would provide low- and moderate-income qualifying households short-term (no more than 3 months) rental and/or utility assistance to prevent homelessness. Blue Ridge Legal Services received funding to assist households with free legal services to reduce the threat of homelessness in the City by using the courts to prevent evictions and keep City residents in their homes. Both programs continued in 2021.

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

The City used its entitlement grant funds to assist non-profit organizations that serve homeless individuals and families in Staunton. The City also continued to spend down federal CARES Act funds to support the following homeless shelter and homeless prevention programs:

- Valley Mission
- Salvation Army Homeless Prevention
- Community Foundation of Blue Ridge Homeless Prevention

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

Actions taken to address the needs of public housing

The Staunton Redevelopment and Housing Authority (SR&HA) converted all of its public housing units into project-based Section 8 units under the Rental Assistance Demonstration Program. SR&HA currently owns and manages a total of 150 residential units including 50 units for the elderly and disabled. The units range from one bedroom to five-bedroom townhouses. Rent is based on income and utilities are included.

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

Staunton Redevelopment and Housing Authority (SR&HA) has a resident council that participates in meetings and events. The Council was particularly active during the conversion of the units to project-based vouchers under the Rental Assistance Demonstration program in 2016.

Actions taken to provide assistance to troubled PHAs

SR&HA is not designated as troubled.

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)

In 2020, the City of Staunton prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. One of the impediments identified included lack of policies and procedures—the City of Staunton has since adopted an Anti-Displacement and Relocation Plan and will continue to consider amendments to the Zoning Ordinance, as needed.

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

Programs funded through the 2021 CDBG program largely assisted the elderly and children living in unstable and inadequate housing conditions, who have been victims of abuse or neglect. Programs funded using CARES Act dollars focused on homeless prevention, homeless services, food insecurity, and public health education.

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

As part of its code enforcement efforts, Staunton’s building code department educates City residents about lead paint hazards.

The City also utilizes CDBG funding for housing rehabilitation activities. Applicants for rehabilitation funding receive the required lead-based paint information. Contractors understand their responsibilities to use lead-safe work practices and mitigate lead-hazards identified during the course of the rehabilitation activity. All Risk Assessment, paint-testing, lead-hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35. Maximum assistance for the program does not exceed federal abatement thresholds.

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

The City recognizes that the best way to assist people in improving their economic positions is to provide employment opportunities, and this is reflected in the City’s Economic Viability score of 41 for job opportunities. Through its policies and planning, the City encourages business growth and the availability of workforce training and educational opportunities in the community.

Staunton supported organizations that provide supportive services to encourage local economic development, and to preserve and improve affordable housing options as part of its strategy to

prevent and alleviate poverty. By combining job creation, workforce development, and other income-raising activities with efforts to increase the supply of affordable housing, fewer residents will experience housing cost burden.

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

The Community and Economic Development Department is the lead agency responsible for administering the City's CDBG Program. Although the City feels that the existing institutional structure is sufficient for carrying out activities to address identified community development needs, the City Manager's Office plans to continue to strengthen its working relationships with local social service agencies. Public and non-profit agencies that are critical to the institutional structure must work cooperatively, and agency staff have the ability and expertise to deliver services efficiently and effectively, often with years of expertise in their respective fields.

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

The City's plan to improve coordination among its partners to promote a broadly shared understanding of community needs, collaborative and complementary approaches to addressing needs, and responsiveness to changes in conditions was accelerated as a result of the global pandemic. The City and its partner agencies worked together to identify new needs of residents and effectively utilize new federal dollars to address these needs.

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

The City of Staunton completed the AI in 2020. During the 2019 program year, the City hired consultants to analyze data, review policy and procedures, and identify impediments towards fair housing choice. Throughout the next two years, the City will continue to implement these recommendations.

The City of Staunton created a Diversity, Equity, and Inclusion Committee made up of community members chosen by City Council to represent diverse segments of the Staunton community in an effort to understand and implement or modify policies, programs, and procedures to achieve social and racial equity within the City.

One of the impediments identified included a lack of policies and procedures related to fair housing. The City of Staunton has since adopted an Anti-Displacement and Relocation Plan. In addition, the City supported infrastructure projects to provide new affordable housing opportunities in desirable locations in the City to ensure housing options are available for all City residents.

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

As a new entitlement grantee, the City worked on the development of a plan and process for monitoring all CDBG activities to ensure appropriate use of funds. In 2021, each subrecipient of City CDBG funds was required to maintain records of all project expenses, activities, correspondence, and other information as requested by the City, for a period of no less than five years from the date of the final project report. All documentation is maintained in the City's CDBG files. The City utilized an annual report to track efforts made to achieve Annual Action Plan goals relative to their individual metrics and milestones. Ongoing, the City will require quarterly reporting and invoicing so as to monitor activity progress towards meeting goals and outcomes. In addition, this process allows the City to continually evaluate whether the costs being submitted for payment are eligible and reasonable.

The City did not conduct on site monitoring during 2021, but continued to review invoices and program reports to ensure subrecipients were implementing programs properly.

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.

Through a collaborative planning process involving a broad range of public and private agencies, the City has developed a single, consolidated planning and application document for the use of federal entitlement funds available through the CDBG Program. In agreement with 24 CFR 91.115(e), Staunton has adopted a Citizen Participation Plan describing the citizen participation requirements of its CDBG program. The Citizen Participation Plan is on file at the City Community and Economic Development Department, and on the Department's website. The City supplements the process described in the Citizen Participation Plan with the use of an email list. There are currently more than 35 organizations and individuals on the email list. The email list is used to announce upcoming hearings, distribute slides and handouts from those hearings, and advertise the availability of critical documents, such as the CAPER. Per the City's Citizen Participation Plan, an ad was placed in the *Staunton News Leader* on November 22, 2022 notifying the public of the availability of the CAPER for public display. The CAPER was placed on public display from November 23-December 7, 2022.

COMMENTS TBD AFTER DISPLAY PERIOD

CR-45 - CDBG 91.520(c)

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

The City of Staunton has not made any changes to the FY 2019-2023 Five Year Consolidated Plan and its program objectives during this reporting period.

According to the PR-23, during this CAPER period, Staunton expended CDBG funds on the following activities:

- Public Services: \$72,408.05 (54.34% of the total expenditures)
- General Administration and Planning: \$29,810.63 (22.37% of the total expenditures)
- Housing: \$31,030.00 (23.29% of the total expenditures)

The total 2021 Program Year Expenditures equaled \$133,248.68.

As indicated previously, the housing rehabilitation program continued to be delayed due to challenges presented by the pandemic. Renewing Homes continued outreach efforts to both homeowners and contractors to encourage participation in the program. Recognizing that rehabilitation is still a need in the City, the City will continue to fund the program as resources dwindle, but may reduce projected outcomes.

The City's public infrastructure projects also were delayed due to staffing changes in the Department of Public Works and the pandemic, but the Rockway waterline project was awarded and is underway. The Beverley Street sidewalk project will begin in 2023, and A Street Aging in Place, which will provide infrastructure to support the development of affordable homeownership opportunities will begin in calendar year 2023.

The City is also continuing to evaluate the unmet needs related to COVID in order to allocate any remaining CDBG-CV resources. The City will undertake a substantial amendment as necessary in order to allocate those resources.

The City is not planning any major changes to its program objectives and will continue to build capacity internally to effectively manage and implement its CDBG program.

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

No.

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

Does not apply.

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	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 8 – 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).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The Rockway waterline project is subject to Section 3 requirements; however, the activity is not yet completed and Section 3 compliance requirements will be added upon activity completion.