

MUNICIPALITY OF MANATI

Hon. José A. Sánchez González – Mayor
Office of Federal Affairs
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*Consolidated
Annual
Performance
and
Evaluation
Report
(CAPER)
PY 2018*

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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 Consolidated Annual Performance and Evaluation Report (CAPER) is a requirement of the US Department of Housing and Urban Development (HUD) for all the entitlement cities or communities receiving HUD funds under the programs known as CDBG, ESGP and HOME. These are the acronyms for: Community Development Block Grant Program (CDBG), Emergency Solutions Grant Program (ESGP), and Home Investment Partnership Program (HOME). The Municipality of Manatí is an eligible recipient of formula grant funds only under the **CDBG Program**. The CAPER is the document that reports the expenditures and how the Municipality is investing the funds received during a Fiscal Year (or Program Year) as well as the progress in carrying objectives set for the Action Plans. The CAPER also contains an evaluation of performance in meeting priorities and objectives of the Five-Year Consolidated Plan (Con Plan). This CAPER covers the period commencing on July 1, 2018 and ending on June 30, 2019 (period also called PY-2018), and it is the first performance report of Manatí's Five Year Con Plan 2018-2022.

The Autonomous Municipality of Manatí also manages and operates the following allocations, aimed to enhance economic development opportunities and improve the quality of life of citizens:

1. *Housing Choice Voucher Program (HCVP)* - Also known as Section 8 Program, which was used to provide decent housing to up to one hundred and eighty-two (182) eligible families.
2. *Housing Opportunities for Persons with AIDS Program (HOPWA)* - The municipal government also had an agreement with the Municipality of San Juan as a sub recipient entity by which up to seven (8) participants received assistance last year.
3. *Programs 5310, 5307* – Transit Programs subsidized by the Federal Transit Administration (FTA) aimed to provide and improve transportation services.
4. *Early Head Start and Head Start Programs* – Educational Programs to enhance the integration and academic development of children and also, improve the families' access to training and employment services in Manatí, Ciales and Florida.
5. *WIOA Programs* - the City is a member of the Manatí-Dorado Labor Development Area, a Regional Consortium responsible to implement and manage employment and training programs focused primarily on low to medium income families and business services. These funding allocations under the Workforce Investment Opportunity Act (WIOA) are possible through a sub recipient agreement with the Puerto Rico Department of Economic Development and Commerce.

6. *CDBG-DR Program* –The municipality also had an agreement with the Puerto Rico Department of Housing as a sub recipient of the Housing Rehabilitation, Reconstruction and Relocation (R3) to implement an Outreach Program and manage the housing inspections.
7. *FEMA’s Public Assistance Programs* – It also has been eligible to receive a millionaire allocation to cover incurred costs related to the passage of Hurricanes Irma and Maria, and also to deploy Public Facilities Permanent Improvements.

Certainly, these initiatives became an integral part of the City’s comprehensive strategic effort to serve low to medium income persons and improve affordable housing, suitable living environment and the quality of life of Manati’s residents.

For many of them, the performance outcome is cover by other public reporting instruments than the CAPER.

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 – Consolidated Plan	Actual – Consolidated Plan	Percent Complete	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete
Housing Rehabilitation for Homeowners	Affordable Housing	CDBG \$160,000 General Fund: \$20,000	Housing Rehabilitation for	<i>Homeowners Household Housing Unit</i>	45	6	13%	5	6	120%
Public Facilities Construction or Improvements	Non-Housing Community Development	CDBG \$380,605	Public Facility or Infrastructure Activities for Low/Moderate Income Housing	<i>Households Assisted</i>	5145	350	7%	3125	350	11%

Sidewalks Accessibility	Non-Homeless Special Needs	CDBG \$61,605	Benefit Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	<i>Households Assisted</i>	3500	0	0%	1240	0	0%
Economic Sustainability	Other	WIOA \$392,351	Business Assisted: 1	<i>Business Assisted</i>	5	3	60%	0	60	0.00%
				<i>Jobs Created/ Retained:</i>	100	65	65%			
General Administration	Homeless	CDBG \$150,552		<i>Other</i>	1	1	100%	1	1	100%
Housing- Public Services	Affordable Housing Non-Homeless Special Needs	General Funds: \$35,000	Homelessness Prevention	<i>Persons Assisted</i>	15	15	100%	5	15	300%
Housing and Supporting Services	Affordable Housing Non-Homeless Special Needs	Section 8 \$969,115	Homelessness Prevention:	<i>Persons Assisted</i>	160	177	111%	160	177	111%
Housing and Supporting Services for persons with HIV/AIDS	Affordable Housing Non-Homeless Special Needs	HOPWA \$31,271	Homelessness Prevention:	<i>Persons Assisted</i>	5	8	160%	3	8	160%
Transportation Services	Non-Homeless Special Needs	FTA \$535,936	Public Service Activities for Low/Moderate Income Housing Benefit	<i>Household Assisted</i>	650	1541	237%	225	1541	648%

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 projects and activities assisted with CDBG funds during PY-2018 were all consistent with the priorities and specific objectives identified in the 5-Year Consolidated Plan 2018-2022. They are also consistent with the national objectives of providing decent housing, a suitable living environment and expanding economic opportunities principally for low-and-moderate income persons. The Municipality execute some of the activities proposed in the Annual Action Plan; surpassing in some cases the goals established. The accomplishment of these goals where possible by leveraging economic resources made available throughout the year by aligning common objectives, participants and eligibility requirements. This practice provide us with additional resources aimed to extend our service coverage.

The Municipality of Manati is using the CDBG funds to benefit persons of low and moderate income, guarantee an investment of at least the 70% of CDBG resources in activities that benefit such persons, as required by the applicable regulations. Priority has been given to rehab of L/M income housing units throughout the City and also to Public Facilities Improvements. CDBG allocation has been used and complemented with local funds set aside for housing rehabs, whose accomplishments are also reported in this CAPER. There were a total of six (6) housing units under rehabilitation during PY-2018; all of them were fully completed, been 4 of them subsidized with CDBG funds and two (2) with ordinary funds. Unfortunately, the City is still experience shortage of construction materials, extended delays in deliveries asocated to the aftermath of Hurricanes Irma and Maria. As the Administration projected, this situation keesp limiting the amount of housings impacted every year. *Notwithstanding, during PY-2018, CDBG funds were spent for continuing the Preservation of the Housing Stock (or Housing Affordability).*

The Municipality also provide direct homeless prevention services to fifteen (15) persons through PUEDEM's Program. This program provide monthly services to nearly one hundred (100) participants of low and extremely low income. This year, 15,650 daily meals were offered to ninty nine (99) citizen; 10 of them between the ages of 65 or plus years. Services also include referral services to social workers and agencies responsible for Drug and Alcohol Preventice Services.

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	6
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	6
Hispanic	6
Not Hispanic	0

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

Narrative

The Spanish Version of form HUD-27061-H is the form used to gather race and ethnic data in assisted housing and public service programs sponsored by the City Government through HUD allocations. Each participant 18 year or older is provided with the form. Completed forms are return to program staff to be placed in the household's or participant's file. For reporting year 2018, 5 participant received assistance with CDBG Rehabilitation Program funds. All are Hispanic. Another 350 households were beneficiated of the Public Facilities Construction or Improvements Activity, specifically with the REpavement of Road 6672 in the Coto Norte Ward, Las Marquez Community.

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	1,115,145	327,386
HOME	HOME	0	0
HOPWA	HOPWA	31,271	31,271
ESG	ESG	0	0
Section 8	Section 8	969,115	969,115
WIOA	WIOA	392,351	392,351
FTA	FTA	535,936	445,670
Other	Municipal	55,000	55,000

Table 3 - Resources Made Available

Narrative

For the reported 2018 Program Year, the Municipality of Manati has available a total \$1,115,144.79 of CDBG funds to undertake eligible activities. A total amount of \$327,385.73 was allocated to undertaken activities in PY-2018, representing this 29% of expenditures of the cumulative resource available at the beginning of the program year. This additional information is available on IDIS Report PR-26 (Financial Summary Report) herein attached. The level of expenditure reflected on PY 2018 was still directly impacted by all the adverse chain of events resulted from the passage of Hurricanes Irma and Maria.

In addition, the municipality had available HOPWA funds in the amount of \$31,270.75, Section 8 funds in the amount of \$969,115, \$55,000 from Local fundings and \$545,936 from other federal allocations.

Identify the geographic distribution and location of investments:

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Housing Rehabilitation for Homeowners*	21%	0% ¹	Planning and Administration
Public Facilities Construction or Improvements*	51%	14%	Special needs services
Sidewalks Accessibility*	8%	0%	Housing Services
Economic Sustainability	0	0	Service for Special Need persons
General Administration*	20%	17%	Service for the Homeless
Housing- Public Services	0	0	Pmt. of Annual Installments
Housing and Supporting Services	0	0	
Housing and Supporting Services for persons with HIV/AIDS	0	0	
Transportation Services	0	0	

Table 4 – Identify the geographic distribution and location of investments

Narrative

For Public Services Activities and Housing Services, the Municipality of Manati has not identified during the planning process target areas to serve since its L/M income population tends to be dispersed throughout the City, and the need for assistance is not limited or concentrated on determined or specific Census Tracts. All of funded services are being provided on citywide basis, and are covering beneficiaries that CDBG Program regulations identify as limited clientele and are to assist L/M income eligible applicants. Due to the continuous budget reduction that are affecting grantees, the City determinate to allocate CDBG funds to activities that have an imminent impact on economically disadvantage communities and individuals. In order to strengthened our investments and provide integral services, activities designed to provide Public Services were funded in PY-2018 by General Funds. These were provided through “PUEDEM” and CONDUCE programs.

¹ 0% Of AAP 2018-2019 Funding, a total of \$XXX, were covered with funds available from previous years.

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.

There is no match requirement for the CDBG Program. No publicly owned land was used to address the needs included in the Action Plan reported.

Certainly, achieving the goals and objectives traced in the Strategic Plan is not an individual assignment. It requires the integration and collaboration of other Local Administrative units, Agencies, Non Profits and the Private Sector. Program Year 2018, was no exception, in fact, due to the extension of damage to the housing inventory in Manatí new alliances were created with diverse sectors to leverage CBGD funds and to attend our target population.

For PY 2018, these were some of the programs and funding sources available that provide us with a wider range of services.

- Section 8 Program, through the administration of the Housing Choice Voucher Program and HOPWA rental assistance voucher and the homeownership programs.
- Administrating funding allocations from the Federal Transit Administration (FTA) and Federal Highway Transportation Administration (FHTA) to provide transportation services to the elderly and to persons with impediments. These funds also provide resources to improve the quality of services, to expand or reevaluate transportation systems, roads, bridges and others, creating sustainable environment and enriching community access to equality and economic opportunities.
- Alliance with Private Management Administrator (In Capital) of all public housing projects located within Manatí jurisdiction (8 housing projects) to refer the homeless population in need of a shelter and also, to receive referral for the Section 8 and HOPWA programs.
- Alliances with Regional Consortiums and State Agencies to refer very low, low to moderate income individuals in need of training and job opportunities, medical services, coaching and preventing services, assistance with the use and abuse of controlled substances, among other related to violence, sexual assault and domestic violence. These allied institutions are the Puerto Rico Department of

Family, Puerto Rico Department of Health, the Manati-Dorado One Stop Center / American Job Center, among others.

- Alliances with Non-profit Organizations in order to provide an array of supportive services including, counseling, medical services, provision of basic services such as access to water, food and shelter were offered to low to moderate income persons and homeless population, respectively.

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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	5	6
Number of Special-Needs households to be provided affordable housing units	0	0
Total	5	6

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	160	177
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	5	6
Number of households supported through Acquisition of Existing Units	0	0
Total	165	183

Table 6 – Number of Households Supported

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

The amount of available funds continues to decline, and the costs of most projects continue to increase, the City is facing with the need to make substantial changes to the activities undertaken. The significant tightening of resources is seriously impact the City’s ability to meet five-year program goals with “high” priority activities receiving little or no funding in current and future years. On the other hand, there are no availability of access to the ESGP formula grant program, has limited the services for homeless, activity that are substantially covered by municipal funds. Housing Rehab Program continues assisting L/M families, but not at the projected pace, this because the reduction of the municipal revenues that required cuts in working hours and brigades for the repair of housing under this program. However, we need to point out that the rehab's five year goals were reached since PY-2015 and by the end of this 5 year planning cycle the cumulative goal has been surpassed.

Discuss how these outcomes will impact future annual action plans.

During the PY-2018 continuous progress was made on most of the five-year goals established in the Con Plan, as is outlined in the Goals and Outcomes Accomplishments tables. Some projects are still underway and will report accomplishments in subsequent CAPERs. Lessons learned, best practices and a whole new level of knowledge that brought to us the last catastrophic events, were gathered to project activities, goals and strategies for the new planning cycle that commence on PY 2019. All of this element have been put together to propel the level of effectiveness and satisfaction of the services our City provide with HUD allocations.

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	4	0
Low-income	2	0
Moderate-income	0	0
Total	6	0

Table 7 – Number of Households Served

Narrative Information

The municipal government has continued with its efforts to repair and improve housing units of those low and very low-income families of the community. As result, six (6) units occupied by nineteen (19) low-income persons, were completely or partially rehabilitated using both, local and CDBG funds. From those, as mentioned earlier on this document, six (6) were completed, one of them initiated in PY 2016, was completed using CDBG funds. The above table does not include the 99 citizens served through "PUEDEM" Program all of them presumed as extremely low-income persons.

Therefore, during the reporting period the Municipal Government emphasized on the rehab of the housing stock, keep strengthened and effective the existing Section 8 and HOPWA, and provide Public Services with General Allocation for the elderly, persons with impediments, and persons victims of violence, sexual assault and domestic violence. Additionally, with local funds and through the Faith Base Community Office, homeless participants were also served. All these efforts addressed to the most disadvantages citizens residing in Manatí.

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

Data collection about the socioeconomic problems of Manati especially for homeless persons and families with special needs. Drug and/or alcohol addicts, abuse women, children, elderly persons and mental ill prevail among the groups in needs of emergency shelter and transitional housing. The total homeless persons in Manati were estimated in 40 persons in year 2016, and 65 in 2017. The homeless persons with special needs related to alcohol and drug abuse are the main groups follow by individuals present mental problems. In both years were identified 5 elderlies, and 2 persons with AIDS and AIDS related diseases. The need of shelter in Manati is clear by the fact that Manati does not have shelter for the homeless. Services are mainly provided by the State agencies that have to send homeless people to other municipalities.

Addressing the emergency shelter and transitional housing needs of homeless persons

Hogar CREA – A private non – profit organization serving adults and teenagers with temporary shelter during the treatment period; it also provides meals, counseling, therapy, health care, vocational and recreational services. This facility has a capacity for 18 persons (males) nearby Los Murales Residential Project in the middle of the urban core in Manati pueblo.

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 of Manati is not formula recipient of funds under the Emergency Solutions Grant Program (ESGP) limiting the offers to help or assist extremely low-income individuals and families who are likely to become homeless. The Community Base Faith Office operating with municipal funds works with this population. They provide coordinate for comprehensive services to prevent and homelessness to many extremely low-income individuals. They basically continue to work through referrals.

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

Through the Puerta de Esperanzas de Manati program (PUEDEM), sponsored by the Municipal Government, referrals, case management, and orientations for services, is provided to numerous homeless and/or potential to be homeless.

As described in CR-05 (Summary of Accomplishments) PUEDEM served 99 recurrent users of the centre, 10 of them with 65 years or plus. PUEDEM provided a total of 15, 660 meals in PY 2018.

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

Actions taken to address the needs of public housing

The Public Housing Administration of the Puerto Rico Department of Housing is the responsible Agency to establish the Public Housing Policy for all the state Public Projects in Puerto Rico. The municipal government was selected in 2003 to administer a public housing project in Manati, 643 housing units were under the administration of the Municipal Government until December of 2016; there were “Los Murales” housing project with (214 housing units), Brisas de Campo Alegre (149 units) and Enrique Zorrilla (280 units). Thereafter, the Public Housing Administration, based on a new State Government public policy, entered into a contract the private agent named *Inn-Capital Housing Division*. This Agent has now the administration of all public housing projects in Manati (eight projects).

The state agency has a resident initiative program to be implementing by the administration agent of all public housing in Manati. The municipal government has programs and services that were provided especially for all the residents of Los Murales, Campo Alegre and Enrique Zorrilla public housing, and have continued after the transition period to the private agent. The list of activities related for resident initiative included the following:

- Project Library – Project Enrique Zorrilla is equipped with a computer center with internet access and open daily after school hours for the benefit of resident’s students. Computer Workshop is provided for young residents.
- Security services were provided for Los Murales and Campo Alegre.
- Recreational activities and personnel (recreational leader) for Campo Alegre
- Sport activities at Enrique Zorrilla
- Garbage collection in all residential complexes.

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

As included in the Puerto Rico Public Housing Authority PHI Plan, the Municipality it is committed to support the use of funds to cover the costs of feasibility studies for the conversion of rental units to homeownerships units. Also, the Municipality will request the PRPHA to maintain a similar inventory for rental housing, and assist in the provision of technical assistance to residents to build administration capacity.

Actions taken to provide assistance to troubled PHAs

In Puerto Rico, the Public Housing System is administered by the State Government; no financial assistance is available for the PHA if it is designated as troubled. Nevertheless, the Municipality of Manati will continue to provide basic and essential public services, such as health, sports and recreational, public works, waste disposals, emergency response, among others, to the public housing projects and their residents.

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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 municipal government guided during PY 2016 an initiative with the collaboration of the Puerto Rico Department of Housing (DH) to revitalize various communities. Through this initiative program we have made approached to impact the communities: Canto Marino, El Horno, Cerro Quinones, Cerro Gandia and Cortes rehabilitating the economic distress areas in the sector. State and local municipal government funds and community CDBG will used to rehabilitate housing and infrastructure of the slum and blight areas in various communities of the city. The program is still in progress with a slightly change in its approach but continues to address three (3) objectives:

- **Community Stability** – This will measure the extent to which a Project Maximizes Community Stability and Minimizes displacement of the projects residents. The projects will emphasis in not displace resident or, if displacement is required, provides a plan for relocation in the same community.
- **Community Involvement** – This will emphasis the community involvement in the different project stage (before, during and after the construction).
- **Innovation** – The project will involve a new or innovative approach to meeting the housing needs of the targeted households.

It was simple to outline many public policy-type barriers to affordable housing in Manati. This diverse listing of barriers represents widely different problems for different people. The following Table summarizing strategies to overcome some of those barriers, as was stated in PY-2014, and which remained in PY 2018.

Municipality of Manati Federal Programs Department Program Year 2016-2017 Barriers to Affordable Housing	
Barriers	Strategy for Amelioration
Tax Policies Affecting Land and Other Properties	Tax Shelter will be Offered to Ventures to be Located in Poverty Areas
Municipal Taxes	Lower Construction Taxes in the Case of Social Housing Projects
Land Use Controls and Zoning Ordinances	It is Recognized that Agriculture is an Important Aspect of the Economy
Land Use vs. Cost of Land	The Land Use Plan of the Municipality of Manati Protects the Agricultural Land and the Balance Between Those Lands Available for Potential Developments
Building Codes and Consultation Procedures	The Municipal Government is in the Process of Creating the New Permit Department that will Streamline the Permitting Processes
Burdensome Building Permits Requirements	
Fees and Charges / Impact Fees	State Agencies will be Encouraged to Review their Impact Fee Policies for Social Housing Projects
Minimum Salaries Requirements	No Amelioration is Possible
Policies that Affect the Return on Residential Investments Increasing Cost of Construction Materials	The Legislature of Puerto Rico will be made Aware of the Need to Reduce Important Duties on Construction Materials for Affordable Housing Projects
High Cost of Rental Housing	Rental Subsidy will be Offered to Low and Very Low-income Families Reducing the Economic Burden of the Renting a Housing Unit
High Cost of Housing Units	Homeownership Subsidies will be Offered to Low and Moderate-income Families to Allow them to Acquire a Housing Unit

Barriers to Affordable Housing

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

Last fiscal and programmatic year was with no doubt, an atypical year. Due to the passage of Hurricanes Irma and Maria many projects were rescheduled and projections were hard to achieve. There are bigger gaps in unmet needs in our jurisdiction somehow waiting to be attended, due to the limited amount of funds. Also, there are other situations that limits the funds required to address these needs, example are legislative projects approve, affecting recurrent resources available to local jurisdictions, therefore limiting local resources, while obligations remain increasing. Example of this will be law establishing special zones with availability of local taxes elimination for eligible companies without consideration of local impact, the application of minimum wages which increases local service appropriations, and affects eligibility in those low mod income individuals due to their increase in salaries as result of the application of the minimum wages while federal income limits remains at

same level making it hard for this population to receive federal funded assistance.

The Municipality of Manati will continue making efforts to identify additional funds and resources to make available to approach other needs for the underserved.

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

EPA Renovation, Repair, and Painting (RRP) Rule is the most important Federal lead regulation since the HUD Lead-Safe Housing Rule a decade ago. It has the potential to ensure the widespread use of lead-safe work practices in homes and child-occupied facilities and may be extended to public and commercial buildings in the future.

The Municipality of Manati had the staff members of all our different housing projects who are responsible of the renovations or repairs including painting or window replacements in the projects, to attend a session of *Housing and Urban Rehabilitation for the Benefit of All: Maximizing the Investment of Resources* and also to *Lead and Healthy Home Workshop* sponsored provided by HUD Caribbean.

The Municipality is committed to comply with the new requirements for Lead Base Paint Hazard requirements as stated in the Municipality of Manati five year Consolidated Plan:

- EPA certified personnel assigned to the Department of Housing, and/or EPA certified contractors will undertake assessment and abatement activities expeditiously. LBP assessment and abatement activities will be carried out consecutively, but once housing units with LBP content requiring abatement work, and in which children under 6 are residing have been identified, abatement will be initiated on a Second- come-Second-served basis, as funding permits. Similar assessment and abatement methods to those used by the PRPHA for public housing will be used.
- A bidding process will be undertaken for certified contractors to complete abatement work in Manati. Lead inspectors will review the abatement work completed by external contractors.
- The Office of Federal Affairs (OFA), before Department of Community Development & Housing, the Office of Planning, Environment, Development and Urbanism and sub recipient must participate actively in educating the public regarding the LBP program, and in providing orientation to owners of priority houses that are targeted for assessment and abatement efforts. (Personnel of the OFA have taken during this PY-2017 updated course on LBP).

Although temporary relocation is not anticipated, both owners and tenants of priority housing will require orientation on the potential risks of the assessment and abatement action, legal rights and responsibilities, potential health risks in the case of positive test results, lead poisoning examination procedure, and treatment services if poisoning is determined.

- A data collection and recording system will be developed in accordance with HUD’s “LBP: Guidelines for Hazard Identification and Abatement”. All information related to field sample and quality control analysis, including data on referral of units for testing the HOME and Section 8 programs, type of assessment, equipment, personnel, methods, procedure and results will be collected and entered into data system which will be developed by a contractor. If verification laboratory testing is conducted, such laboratories will be carefully selected based on prior experience. These laboratories will be required to maintain records and reports all data regarding the laboratory itself, its methods, and the condition under which tests are performed, as well as all test results at every stage of the process.

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

According to the 2010 U.S. Census Population, approximately 62% of the families and 64.8% of the persons comprising the city’s population have median income below the poverty level. This percent mean that 6,234 families and 25,032 persons live below the poverty level measure. Uncertainties, both are significant figure, which require extraordinary efforts for significant reduction. Moreover, its reduction depends not only in those action directly promoted by the local government but also the pattern of the island economy. The level of employment, investment and the composition of the economic sector are important factors to attain a reduction in the number of persons under the poverty level. This is aggravated by a stagnant local economy and the slower pace of the mainland economy, factor which promote a conservative environment for investors and financial institutions thus resulted in reduced opportunities for new investments, for example in affordable housing. Additionally, there is a huge need for the development of more community based organizations to promote more public-private joint efforts. However, the city government considers that there exists a great potential to improve the existing condition if private-public joint efforts are stimulated. State and local governments of the 78 municipalities need to establish new incentives due to pace down of the Puerto Rico’s entire economy reflected in the closing of businesses and loss of population in its productive age.

Our strategy is to continue with allocation of public resources in low and moderate-income areas, the revitalization of sectors with large concentration of low, very low and moderate-income persons, the creation of new incentive to promote the location of new economic activities within the city and the expansion of the existing business structure; the creation of new programs in training the labor force using funds from the Workforce Innovation and Opportunity Act.

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

The evaluation of the institutional structure and its resources is a continues effort in all public or private organizations to improve efficiency and effectiveness in the implementation policies.

However, the administrative structure of the municipal government was subject of an important administrative reorganization and restructure in the year 1995, including the creation of new management areas calling “umbrellas”. This was to fortify the effectiveness and efficiency of services rendered the implementation of programs and project to overcome the gaps for carrying the socio-economic strategy stated in the “Territorial Ordinance Plan”. Some of the key elements of such reorganization relevant to this Plan were the following:

Establishment of four (4) areas of managerial intervention

- Construction
- Services
- Federal Programs
- Finance

This reorganization was fortified with the recruitment of some additional specialized personnel and the improvement of equipment and facilities. The Con Plan is being directly benefited from these implemented institutional improvements. Therefore, is no additional modification that is necessary to put immediately (or at the short term) into a practice to overcome gaps for carrying the strategies established in the Con Plan or the Action Plan.

However, the organization structure has simplified the coordination between all the departments in charge to carry out the Consolidated Plan. In order to follow up the implementation of the Five Years Con Plan, if it is necessary to do so, the current Federal Affairs Office (previously the Department of Community Development & Housing) is in charge. Such Department is also responsible for the proper coordination with all the public and private entities identified. This is the contacted department, during the Plan development and/or during the implementation stage, which coordinates with other key organizational units of the local government, to properly follow the investment that is herein discussed.

Therefore, there were no changes in current administrative structure during the reporting period.

The Municipality delivery system is designed to provide the economically disadvantaged populations, including populations with special needs, with an effective housing and community development strategy, based in a networking approach.

Coordination and collaboration efforts among agency partners are the key in achieving our goals. Therefore, the communication process should be dependable among system representatives because the accomplishment of the objectives, regarding services to the eligible population, relies in a direct and effective exchange of information.

The Municipality will continue to work to improve, in an on-going basis, the coordination, collaboration and communication process among the network partners to guarantee positive objectives achievements regarding the extremely low, low and moderate-income population.

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

The Municipality has continued supporting the communication process with all Con Plan partners, to undertake the housing, community development and economic development activities as was designed for the program year. The communication process has been enhanced through the coordination of working meetings, and exchanging programs and activities information to assist all agencies and private entities to help us in address the needs of low income and special populations. The Municipality also maintained a direct communication with the PRPHA as part of all process related with the public housing administration now under a private agent administration.

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 Municipality of Manati revised on October 2013 the Fair Housing Analysis of Impediment in compliance with Action Plan for PY 2014. We are continuing updating the data set from the 2010 census and the American Community Survey to maintain the information up to date. The conclusions remain valid and in effect, and continues to serve as benchmark for public policy determinations including guidance for programs' design and implementation. In the upcoming years, an Assessment of Fair Housing will be submitted as required by the present federal regulations which will definitely impact the Con Plan 2018-2022.

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

For the City to monitor CDBG funds, the Federal Affairs Office, the agency in charge of administering and implementing the Annual Action Plan, has developed an internal management plan to assure the proper and timely implementation of the strategic plan and the annual plan. Procedures have been put in place to assure proper compliance with all program requirements.

CDBG: Monitoring activities for the CDBG program includes:

- Financial Management
- Project Development/administration
- Quarterly Fiscal Reports
- Compliance with law and regulations of Acquisition and relocation, Environmental Review, Labor Standards, Civil Rights, Procurement, Section 504, etc.
- Rate of Expenditure
- Use of program income
- Compliance with single audits

The municipality follows its Monitoring Plan to evaluate and assure compliance with all the applicable regulations. In addition, we evaluate accomplishments towards goals of the Con Plan. The monitoring review conducted by the municipality includes the following:

- Perform desk reviews for all open year grant projects funded under the CDBG program
- Rank recipients using the risk assessment forms
- Determine monitoring needs and priorities and evaluate resources
- Prepare monitoring schedule
- Pre-Monitoring preparation for on-site review

- On-site monitoring
- Prepare monitoring reports
- Preliminary reports
- Final Reports

During the reporting PY we have follows to appropriately comply with the Financial Management, keep up to date the Quarterly Fiscal Reports, and check compliance of single audits. We were also performing desk reviews for all CDBG open activities.

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

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

In compliance with the Citizen Participation Plan (CPP) adopted by the City Government and HUD regulations, the public was invited and encouraged to make comments or views on this CAPER in person to the Community Development and Housing Department, either verbally or in writing or by contacting such Department by phone. The purpose is to include citizens and residents in the review of the completeness and adequacy of the CAPER document. A copy of the CAPER was available at the Department during business hours for all the interested parties.

The availability of the CAPER was published on August 15, 2019 in “Primera Hora” newspaper, page 11. The Report was available before CAPER adoption during the mandatory fifteen (15) days period. During the revision period no comments, views, objections and/or recommendations were received from citizens, residents, community base organization, community-leaders or other interested party or stakeholders.

A copy of the announcement is attached to this Report.

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.

During PY-2018, the Municipality of Manati has pursued all objectives as were stated in the current and previous Con Plan and the PY-2018 Action Plan, as those were approved by HUD. None of the activities included in the Action Plans have diverged from program objectives, and no change is now projected for current CDBG programs objectives.

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

No

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

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Attachments

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Attachment II : PR-26 Financial Summary Report

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