



# 2022 Consolidated Annual Performance & Evaluation Report

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### **Third Year Consolidated Annual Performance Evaluation Report (CAPER)**

In accordance with Title 24 Code of Federal Regulations (24 CFR) Part 91, all jurisdictions receiving federal funding from U.S. Department of Housing and Urban Development (HUD) programs must complete a Consolidated Annual Performance and Evaluation Report (CAPER) within 90 days from the close of the jurisdiction’s fiscal year. The CAPER covers the period from January 1, 2022 through December 31, 2022 and is due to HUD by March 31, 2023.

The City of Kennewick, program year 2022 CAPER represents the second year of the City's Five-Year (2020-2024) Consolidated Plan. The CAPER describes the City's accomplishments in attaining our goals and objectives outlined in the Consolidated Plan, during the prior year's annual plan. Identifies how funds were actually used versus how the funds were proposed to be used, what impacts the activity realized, and to what extent the funds benefited low and moderate-income persons and a self-evaluation of progress made.

The report presented is in the HUD- prescribed format and represents data entered into the federal Integrated Disbursement and Information System (IDIS) throughout the program year.

## **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 Kennewick, Program Year 2022 CAPER represents the third year of the City's Five-Year (2020-2024) Consolidated Plan and describes the City's accomplishments in attaining the goals and objectives of the 2022 Annual Action Plan, as described in Table 1, covering the period from January 1, 2022 through December 31, 2022 and is due to HUD by March 31, 2023.

The 2022 program year went as planned for the majority of the projects and generally the expected number of persons benefited from the expenditure of the CDBG funds. Goals and numbers were met in a timely manner with the exception of the Canal Drive Sidewalk project which is suffering from backordered street light products which is the reason the project has not been closed in IDIS, but will be by the end of the year.

Public Service projects ran smoothly and met their goals in a timely manner starting with Meals on Wheels. They continue to serve seniors at on-site locations but also continue to deliver meals to seniors at home who are not comfortable going in groups of people due to COVID-19. They deliver both hot and frozen meals, whichever is requested at that time.

The ARC Therapeutic Scholarships were used for the daily VIP program which engages developmentally disabled adults by participating in cooking, music, art, physical fitness, and relational skills. They were able to utilize their entire funds in the 3rd quarter.

Youth Scholarship Program was used entirely by 3rd quarter and an additional \$3,000 was added to provide scholarships to more low-income

children wanting to participate in programs. Unfortunately, not all the funds were used due to not enough applicants so \$1,868 was left.

CARES ACT funding was provided to the City to respond to the Coronavirus (COVID-19) in 2021. We closed out other projects that have been funded by these funds in 2021, but still are working on 2 projects - Pedestrian Pathway Solar Lighting along the pathway of Edison Street & Union Street where children use to walk to/from school, and City Hall COVID Barrier Upgrade in Customer Service. This will replace the current flimsy plexiglass with higher and stronger security glass that will prevent the spread of COVID-19 between staff and customers.

**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
Community, Neighborhood, and Economic Development	Non-Housing Community Development	CDBG: \$891,800	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	17500	25590	146.23%	2807	2840	101.18%
Community, Neighborhood, and Economic Development	Non-Housing Community Development	CDBG: \$ 0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	80	16	20.00%			

Homeless Intervention and Public Services	Homeless Non-Homeless Special Needs	CDBG: \$ 74,000 CV: \$33,800	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5750	2486	43.23%	782	957	122.38%
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**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.**

CDBG funds were used to improve Canal Drive's sidewalk by installing sidewalk, curb, storm drainage, ADA compliant ramps, and gutter to allow children and those that are elderly and physically disabled to access Hatfield Park as well. The area serves a low-mod area and was in need of updates to make walking to/from the park safer. This is also a main arterial and is served by the transit system.

Another project that was completed was W. 6th Avenue sidewalk by installing sidewalk, curb, storm drainage, ADA compliant ramps, and gutter to allow children and those that are elderly and physically disabled to access Underwood Park. The area serves a low-mod area and was in need of updates to make walking to/from the park safer. This is also a main arterial and is served by the transit system.

Public Services for low- and moderate-income persons and families benefited via the following: 192 LMI youth benefited by receiving recreational scholarships for swimming, sports, and day camp programs for the year.

55 ARC developmentally disabled adults received scholarships for therapeutic recreation. The activities focused on improving the skills, health, and wellbeing of the recipients.

Meals on Wheels provided 722 senior citizens 79,006 meals over the course of the year. The meals were delivered to either a set location, such as the Kennewick Community Center, or through home delivery by volunteer drivers who donated their time and mileage expenses to assist seniors with maintaining independence.

The last of CDBG-CV funds are being used for Facility/ Infrastructure Improvements: 33 LED solar lights are being added to the pedestrian

pathway between Edison Street & Union Street to help children and families who walk to/from Edison Elementary School.

Another project is replacing the COVID-19 barrier in Customer Service here at City Hall. There is currently a thin peliglass being held by string that can easily be pushed around and not covering anything. It will be replaced with a more solid standing security glass to stop the spread of COVID-19 in the community.

The last project is with The ARC of Tri-Cities for therapeutic reactional services to developmentally disabled adults.

## 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	873
Black or African American	18
Asian	30
American Indian or American Native	13
Native Hawaiian or Other Pacific Islander	4
<b>Total</b>	<b>938</b>
Hispanic	50
Not Hispanic	888

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

### Narrative

There were no targeted populations in regard to race or ethnicity in 2022.

All 2022 projects benefited low-and moderate-income persons regardless of race or ethnicity.

## 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	124,507	596,509

Table 3 - Resources Made Available

### Narrative

CDBG funds were used to benefit citizens of Kennewick for infrastructure, economic development, and public service projects as well as cover administration and planning costs of running the program.

A total of \$908,315 was made available in in two tranches of \$401,340 and \$506,975, to prevent, prepare and respond to Coronavirus. An amendment was made to the 2019 AAP during 2020 for CDBG-CV funds. CV funds were used for public service, economic development, and administration costs for COVID-19 related projects. To date \$645,455 of the CV funds have been spent.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

### Narrative

All funds expended for CDBG were within Kennewick city limits and benefited primarily low and moderate-income persons/families.

Infrastructure Improvements were located at:

1. W. Canal Drive between US395 Interstate overpass to N. Carmicheal Drive (sidewalks, curb, gutter, storm, pedestrian ramps, streetlights)
2. W. 6th Avenue between S. Vancouver Street and S. Tacoma Street (sidewalks, curb, gutter, storm, pedestrian ramps, streetlights)

Public Service projects:

1. Meals on Wheels at senior citizen homes throughout Kennewick and at the Kennewick Community Center.
2. The ARC of Tri-Cities at multiple locations throughout Tri-Cities area.



3. Youth Scholarships at facilities and parks throughout Kennewick

CARES ACT CDBG-CV projects:

1. COVID-19 Barrier Upgrade at Kennewick City Hall

2. Pedestrian Pathway Solar Lighting between Edison Street and Union Street) with 33 solar lights along 0.6 miles of pathway

3. The ARC of Tri-Cities Therpeutic Services for disabled adults

## 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 infrastructure improvement projects were capped at 15% for all engineering, design, contract administration and inspection requirements - projects can easily run at 20+% of the project cost - the City of Kennewick paid for those additional expenses.

Meals on Wheels has funding from a variety of sources including MOW Older American Act, Medicaid Copes, Volunteer donations, private pay, United Way and Benton-Franklin Adult Services.

The ARC of Tri-Cities relies heavily on volunteers for the therapeutic services it provides as well as private pay and the Developmental Disabilities Administration.

Youth Scholarships participants have tiered co-pay depending on the cost of the activity. Co-pays range from \$0 for swimming lessons to \$100 for full-day summer camp program with the typical cost per child per activity is \$10-\$20. Pool passes and fishing day are free, any classes over \$100 are 10-50% off for those who qualify.

## 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	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 6 – Number of Households Supported

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

CDBG funds were not used for housing assistance.

**Discuss how these outcomes will impact future annual action plans.**

**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.

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	341	0
Low-income	340	0
Moderate-income	193	0
<b>Total</b>	<b>874</b>	<b>0</b>

**Table 7 – Number of Households Served**

### **Narrative Information**

Households served with CDBG were to be at or below 80% AMI. All households serviced by TBRA are to be at 60% or below the low-income limit of 60% AMI and downpayment assistance was to be at 80% or below AMI. The DPA program was not able to assist any households due to home prices and interest rates being over the HUD approved limit within the Tri-Cities.

Number of households supported through rehabilitation count remains zero for 2022. The program will reopen in 2023.

## **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 Kennewick did not directly reach out to any unsheltered homeless persons or assess their needs in 2022 except through staff involvement with Benton-Franklin Continuum of Care and Human Services and the annual Point in Time (PIT) count.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Kennewick did not address emergency shelter and transitional housing needs of homeless persons in 2022 except through staff involvement with Benton-Franklin Continuum of Care and Human Services. A four-plex that was purchased in 2011 with the City's Neighborhood Revitalization Strategy funds, continues to be fully occupied by Domestic Violence Services and Elijah Family Homes. Both non-profit organizations utilize the four-plex to house families that would otherwise be homeless due to domestic violence or substance abuse.

### **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 Kennewick supports public service providers and the Benton and Franklin Counties Department of Human Services, who manage programs that assist individuals and families through the Coordinated Entry System (CES), which is a localized system to efficiently route households who are homeless or at risk of homelessness to the most appropriate provider among the network of homeless service providers as quickly as possible.

The City did not directly assist low-income individuals and families to avoid becoming homeless in 2022, except through staff involvement with Benton-Franklin Continuum of Care and Human Services. They serve as the lead agency for the homeless in our community.

### **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 of Kennewick did not directly assist chronically homeless individuals and families or unaccompanied youth to make the transition to permanent housing and independent living in 2022, except through staff involvement with Benton-Franklin Continuum of Care and Human Services. They serve as the lead agency for the homelessness in our community.

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

### **Actions taken to address the needs of public housing**

The City of Kennewick does not own or operate a Public Housing Agency. The City works with the Kennewick Housing Authority and has done several projects with them in the past. The most recent project provided HOME and CDBG dollars to KHA to provide 16-unit Microhomes to house the homeless. Another project currently in design phase is a 50+ unit complex to house low-income families on 10th Avenue and Gum Street.

The KHA provides long-term subsidized rental assistance to eligible households who have extremely low-to-low incomes throughout its operational jurisdiction in the Cities of Kennewick and Richland, Benton County, Washington. KHA receives federal funding under an Annual Contributions Contract (ACC) from the U.S. Department of Housing & Urban Development (HUD).

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

The City of Kennewick has previously met with the Executive Director of the Kennewick Housing Authority to discuss the program within the Housing Authority community to educate and encourage residents to save towards the goal of purchasing their own home using the HOME Downpayment Assistance Program. Unfortunately, a surge in home prices in our area have made the HUD price limits difficult to meet.

Public Housing residents are encouraged to attend Resident Council meetings to discuss how to become more self-sufficient or improve the quality of life for residents. Previous suggestions have included: Community gardens, youth activities including tutoring services, community service opportunities at the food bank and at other community service entities, property improvement requests such as more parking for residents or unit upgrades.

KHA continues to explore a number of activities to increase self-sufficiency for residents in both public housing and Section 8 programs.

### **Actions taken to provide assistance to troubled PHAs**

Not applicable. The KHA is not 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)**

The City of Kennewick encourages infill development and increased housing densities in areas where adequate public facilities and services (police, fire protection, schools, water and sewer) are in place and can be easily provided. Building fees and charges are consistently lower in the City compared to other cities of the same size. The only growth limitations placed on the City is through the Growth Management Act.

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

All 2022 CDBG funds were used to improve the quality of life for low-moderate-income persons within the City. Decent housing can be made available to those below 30% median income by joining forces with community advocates such as Benton-Franklin Community Action Committee and the Department of Human Services to provide affordable housing for the underserved. Typical projects to meet this goal would be family shelter, domestic violence shelter, and housing for the developmentally and elderly population. The City supports the efforts of local non-profit agencies to meet the needs of underserved populations.

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

The City provided education on lead based paint including information on Safe Work Practices, actions to take when rehabbing or remodeling a home, and steps to take if exposure to lead hazard is suspected.

The pamphlets *Renovate Right* and *Protect Your Family From Lead in Your Home* were distributed to all potential housing clients, put out for residents in City Hall lobby, and online at links from the City's website. The Lead Based Paint Safe Checklist is utilized to evaluate applicability of the lead safe housing rule to CDBG and HOME funded projects.

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

Several activities were undertaken to decrease cost-burdens for low-income people such as the downpayment assistance program offered through the City and the Tri-Cities HOME Consortium. Targeted infrastructure and park projects increase the ability to impact the lives of lower income residents and promotes those areas as a desirable place to live. The City supports the efforts of Benton-Franklin Community Action Committee, Department of Human Services, and local non-profit agencies to reduce the number of poverty-level families.



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

The City pursues various activities outlined in the 2020-2024 Consolidated Plan to strengthen and coordinate actions with housing, non-profit and economic development agencies. The City will, within staff capacity, continue to encourage and support joint applications for resources and programs among housing and service providers. This includes participation in the Benton-Franklin Continuum of Care, Benton Human Services Department, involvement with the Housing Authorities and continued efforts to foster cooperation.

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

The City pursues various activities outlined in the 2020-2024 Consolidated Plan to strengthen and coordinate actions with housing, non-profit and economic development agencies. The City will, within staff capacity, continue to encourage and support joint applications for resources and programs among housing and service providers. This includes participation in the Benton-Franklin Continuum of Care, Benton Human Services Department, involvement with the Housing Authorities and continued efforts to foster cooperation.

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

***Protect populations seeking rental or homeownership opportunities that lack the skills/knowledge to obtain and remain in affordable housing:***

- Fair housing information in English and Spanish has been posted in prominent places within City-owned facilities as well as Mid Columbia Library branches in each City.
- Landlord/tenant educational forums are held every other year to affirmatively further fair housing amongst realtors, landlords and tenants.

***Lack of awareness of issues related to fair housing and impediments to fair housing in the Tri-Cities:***

- Staff works with lenders and realtors by providing the venue and materials for fair housing training.
- Staff will be working with the KHA to create an educational program and guidelines for assisting those living in public housing to graduate from public housing to homeownership. A fair housing workshop is being scheduled to take place in Fall 2023.
- Staff has taken recent training to become more familiar with the latest updates to fair housing.
- Continue to provide interpretive resources available through the Language Line to assist in

communicating in a variety of languages.

- Fair housing posters are displayed at the Richland, Kennewick, and Pasco City Halls.

***Extremely low rental vacancy rates, lack of lower priced rental units:***

- There are currently hundreds of additional rental units being added to the Tri-Cities housing market.

Unfortunately, housing and rental prices have continued to rise in this area.

## **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**

The City of Kennewick is responsible for monitoring program subrecipients to ensure compliance with all federal, state and local rules, regulations and laws. This was accomplished by in-person and some desk monitoring. Quarterly reminders were sent two weeks prior to the quarterly report due dates and the reports were submitted in a timely manner. Technical assistance was offered to all subrecipients throughout the year.

Housing projects funded by HUD HOME assistance were made as grants or loans and documented by recorded deeds of trust, promissory notes, and other contractual loan agreements. Tenant based rental assistance was monitored by the administrator of the HOME Consortium.

The City of Kennewick does not monitor grants or loans awarded directly to other entities by HUD or other federal or non-federal agencies.

## **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 display advertisements for Public Hearings and Public Input/Comments are published three times per year:

- Notification that fundings is available for eligible projects and that applications for funding and training to complete those applications is available
- Notification that a draft Annual Action Plan has been created and will be going to Council for preliminary approval and then HUD for final approval
- Notification that a Consolidated Annual Performance and Evaluation Report has been completed and will be submitted to HUD for approval

The advertisements are published in the Tri-City Herald and Tu Decides (English & Spanish versions).

A public notice was published on March 2, 2023 and the public comment period ended March 27, 2023. The Draft 2022 CAPER was available to the public at various locations during the 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 followed the 2022 Annual Action Plan as submitted and approved by HUD, but COVID-19 caused a shift to include CARES ACT funding to respond to COVID-19. The both tranches of CDBG-CV funding were used for additional public service assistance.

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

No

**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 followed the 2022 Annual Action Plan as submitted and approved by HUD, but COVID-19 caused a shift to include CARES ACT funding to respond to COVID-19. The both tranches of CDBG-CV funding were used for additional public service assistance.

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

No

## CR-58 – Section 3

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

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	2	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**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0				
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business concerns.	0				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0				
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	0				
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.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				

Other.	0				
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**Table 9 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

All efforts were made by the Contractor to target Section 3 workers and labor hours but had no success in doing so due to no applicants or hiring.