

# City of Pembroke Pines

## Consolidated Annual Performance Evaluation Report

**(CAPER PY 2023)**

(October 1, 2023 - September 30, 2024)



**Prepared by:**

Community Redevelopment Associates of Florida, Inc.

**Submitted To:**

U.S. Department of Housing and Urban Development

**City Commission Adoption:**

12/04/2024

## **CR-05 - Goals and Outcomes**

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

The City of Pembroke Pines has made significant progress in Program Year 2023 toward achieving the goals and objectives outlined in the Fiscal Year (FY) 2020-2024 Consolidated Plan and the FY 2023-2024 Action Plan. Key goals include enhancing the Southwest Focal Point Senior Center and the Pines Point Senior Residences. Improvements have included removing accessibility barriers within the Senior Residence Facility, installing impact-resistant windows and doors at both locations, and replacing the roof of the Senior Center.

Additionally, the city has launched the Pines Village Septic Tank Conversion Project, which aims to provide sewer connections for low- and moderate-income households in designated areas. This project will eliminate septic tanks and replace aging water mains and residential service lines.

During Fiscal Year 2023, the city also continued construction on the “501 Medical Building,” located adjacent to the Senior Residences and Senior Center. Once completed, this facility will be equipped to provide testing, treatment, recovery, and isolation for patients, as well as establish separate areas or remote access for those diagnosed with or exposed to COVID-19.

**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
Infrastructure Improvements	Non-Housing Community Development	CDBG: \$355,618	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	0	0.00%	500	345	69.00%
Maintain City's Affordable Stock	Affordable Housing	CDBG: \$365,000	Homeowner Housing Rehabilitated	Household Housing Unit	17	10	58.82%	31	7 (23) SHIP	22.58%
Promote Economic Opportunity	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	5	0	0.00%			
Promote Homeownership Affordability	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	0	0.00%	5	0	0.00%
Public/Supportive Services	Non-Housing Community Development	CDBG: \$166,296	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	2113	42.26%	1000	550	55.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

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

The City of Pembroke Pines was awarded \$1,108,642 in CDBG funds from the U.S. Department of Housing and Urban Development for Fiscal Year 2023-2024. These funds were allocated to various activities, as outlined in **Table 1: Homeowner Rehabilitation, Purchase Assistance, Public/Supportive Service activities for the senior community, Public Infrastructure, and Planning and Administration.**

In addition to these funds, during Program Year 2020-2021, the city received CDBG-CV funds to help local governments prepare for, prevent, and respond to the health and economic impacts of the Coronavirus pandemic. Initially, these funds were directed toward Rental, Mortgage, and Utility Assistance programs. However, the city has since redirected them toward the construction and improvement of the 501 Medical Building, which will serve as a pandemic response center upon completion.

**Priority I – Maintain City’s Affordable Stock**

The city's highest priority is to reduce housing cost burdens for low- to moderate-income households. To achieve this goal, the Home Repair and Purchase Assistance Programs aim to increase the affordability of safe and decent housing while preserving the city’s affordable housing stock. Given the limited availability of CDBG funds, the city collaborates with state and local funding sources to maximize assistance for households in need. Additionally, the Rental and Utility Assistance programs funded through CDBG-CV provide essential financial resources to support low- and moderate-income households impacted by COVID-19.

**Priority II – Increase the access to Public and Supportive Services**

The city acknowledges the vital role of public and supportive services in addressing non-housing community development needs and has prioritized these services accordingly. A prime example of this commitment is the Senior Transportation Program, which effectively served a total of 21,611 seniors, including 550 unique clients from Pembroke Pines. This program underscores the city’s dedication to enhancing mobility and accessibility for its senior population.

**Priority III – Provide for Infrastructure Improvements**

Several projects are currently underway, including the enhancement of the Southwest Focal Point Senior Center, the Pines Point Senior Residences, the Sewer Connection project, and the 501 Medical Building. These projects are being carried out in predominantly low- to moderate-income neighborhoods, ensuring that the benefits reach those who need them most.

## 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)

	<b>CDBG</b>
White	392
Black or African American	88
Asian	19
American Indian or American Native	51
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>550</b>
Hispanic	286
Not Hispanic	264

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

### Narrative

Table 2 provides an aggregate of race and ethnicity data for households assisted through the housing and public services programs. The accomplishment data from all CDBG activities are reported in HUD's Integrated Disbursement and Information System (IDIS).

## 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	1,108,642.00	1,418,925.40
CDBG-CV	public - federal	1,400,676.00	225,905.84
SHIP	public - state	1,965,381.00	2,334,363.66
HOME	public - federal	330,914.00	0

Table 3 - Resources Made Available

### Narrative

#### CDBG

For PY 2023, the City of Pembroke Pines was awarded **\$1,108,642.00** in CDBG funds. These funds were made available to the city by HUD on October 1, 2023. CDBG expenditures for Program Year 2023 (10/1/2023-9/30/2024) totaled **\$1,418,925.40**, which includes program income and funds carried over from previous years.

#### CDBG-CV

The City was allocated **\$1,400,676** in CDBG-CV funds during PY 2020-2021, designed to help local governments respond to the health and economic impacts of the COVID-19 pandemic. For PY 2023 (10/1/2023-9/30/2024), expenditures from these funds totaled **\$225,905.84**. To date, a total of **\$1,053,838.93** has been expended from CDBG-CV funds.

#### SHIP

A total of **\$1,965,381.00** in SHIP funds was made available by the Florida Housing Finance Corporation on July 1, 2023. For PY 2023 (10/1/2023-9/30/2024), SHIP expenditures totaled **\$2,334,363.66**, which includes both program income and funds carried over from previous years.

#### HOME

For PY 2023, the City of Pembroke Pines is expecting to be awarded **\$330,914.00** in HOME funds from the Broward County HOME Consortium, which is currently in progress. HOME expenditures for Program Year 2023 (10/1/2023-9/30/2024) totaled **\$0**.

#### NSP

In 2008, the City was allocated a total of **\$6,729,117** in Neighborhood Stabilization Program (NSP) funds. For PY 2023, the remaining balance of NSP funds is **\$428,055.88**. The city is currently in the process of closing out the NSP program and redirecting the remaining unspent funds to CDBG.

**Identify the geographic distribution and location of investments**

<b>Target Area</b>	<b>Planned Percentage of Allocation</b>	<b>Actual Percentage of Allocation</b>	<b>Narrative Description</b>
Tract# 1101.00 Block Group 3			
Tract# 1103.01 Block Group 1			
Tract# 1103.08 Block Group 3			
Tract# 1103.11 Block Group 2			
Tract# 1103.12 Block Group 4			
Tract# 1103.13 Block Group 2			
Tract# 1103.13 Block Group 3			
Tract# 1103.34 Block Group 1			
Tract# 1103.35 Block Group 1			
Tract# 1103.35 Block Group 2			
Tract# 1103.35 Block Group 3			
Tract# 1103.35 Block Group 4			
Tract# 1103.36 Block Group 2			
Tract# 1103.37 Block Group 1			
Tract# 1103.37 Block Group 2			
Tract# 1103.40 Block Group 2			
Tract# 1103.40 Block Group 3			
Tract# 1103.40 Block Group 4			
Tract# 1103.41 Block Group 2			

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

**Residential Rehabilitation**

**Geographically Planned:** Low- and Moderate-Income Households - Citywide.

**Actual Geographical Area:** Low- and Moderate-Income Households - Citywide.

The Homeowner Rehabilitation program offered by the City of Pembroke Pines provides funding assistance to low- and moderate-income households for essential home repairs. This funding helps address issues such as code violations, health and safety concerns, substandard living conditions, and accessibility needs for elderly residents or those with special needs. The program's goal is to promote affordable housing and improve living conditions. It is supported by CDBG funds, as well as other federal and state grants. Households eligible for assistance are served on a first-come, first-qualified, first-served basis.

## **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.**

HUD strongly encourages entitlement communities to leverage resources to maximize the impact of federal funding for homeownership and residential rehabilitation. To achieve this, the City of Pembroke Pines combines CDBG funds with SHIP and HOME funds, as well as supports various housing initiatives through general revenue and other grant programs. This collaborative approach has significantly expanded the city's budget for housing projects and services.

As a SHIP grantee, the city has successfully utilized CDBG funds to assist 7 units, in addition to using SHIP funds to support 23 units, benefiting low- and moderate-income households, including those who may not meet HUD's stricter lower-income eligibility requirements. The matching requirements were met through these combined funding sources, ensuring a robust financial foundation for the city's housing projects.



## 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	5
Number of Special-Needs households to be provided affordable housing units	0	2
<b>Total</b>	<b>0</b>	<b>7</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	31	7
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>31</b>	<b>7</b>

**Table 6 – Number of Households Supported**

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

While the City of Pembroke Pines has set ambitious goals to enhance affordable housing and support the low- and moderate-income (LMI) community, several challenges have been encountered in achieving these objectives. The ongoing housing crisis and rising median sales prices have made it difficult to attract qualified applicants for programs like the Purchase Assistance Program. Additionally, inflation has increased the cost of goods and services, further straining household budgets and limiting residents' ability to pursue available assistance.

Furthermore, although the Homeowner Rehabilitation Program has experienced some success, rising costs of materials and labor, along with delays in material delivery, have posed significant challenges that hinder the timely completion of active projects. The growing demand for the program is also stretching our resources thin, making it increasingly difficult to meet the needs of all applicants in a timely manner. It is important to note that, by utilizing SHIP funds, the city was able to assist an additional 23 households, falling just one household short of its overall goal.

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

The aging housing stock presents a growing percentage of units in need of rehabilitation to remain safe and habitable, particularly affecting low- and moderate-income homeowners and seniors who often lack the financial means for necessary maintenance.

The condition of the city’s housing stock serves as a vital indicator of future rehabilitation needs. Addressing these needs through preservation efforts not only ensures the safety and integrity of existing housing units but also represents a cost-effective strategy for maximizing limited resources. As the city formulates future annual action plans, prioritizing the Homeowner Rehabilitation Program will be essential to retaining affordable housing and supporting vulnerable populations within the community.

**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	3	0
Low-income	4	0
Moderate-income	0	0
<b>Total</b>	<b>7</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

In Program Year 2023, a total of 7 households were assisted with CDBG funds, including 5 homeowners who received assistance through the CDBG-funded Sewer Connection Grant. No households were assisted with HOME funding during the same program year.

A total of 23 households were assisted with SHIP funding in Program Year 2023. These households were distributed across the following income levels: 3 households in the extremely low (0-30% AMI) level, 6 households in the very low (31-50% AMI) level, 9 households in the low (51-80% AMI) level, and 5 households in the moderate (81-120% AMI) level.

## **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 Pembroke Pines did not receive any specific private or public resources dedicated to preventing homelessness. However, the city remains committed to advancing the goals outlined in Broward County's 10-Year Strategic Plan to End Homelessness by actively participating in the Continuum of Care (CoC) process.

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

The City of Pembroke Pines works closely with Broward County's Homeless Continuum of Care to address the needs of individuals and families experiencing homelessness or at risk of homelessness. However, the city does not receive funding through the Emergency Solutions Grant (ESG) program.

### **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 supports Broward County's 10-Year Strategic Plan to end homelessness and actively works towards achieving the goals outlined through the Continuum of Care process. When the city receives inquiries related to homelessness and chronic homelessness, the program administrator is responsible for coordinating the referral process. This includes collaborating with private entities, non-profits, and public institutions to implement strategies aimed at preventing homelessness and connecting individuals with appropriate resources. Service providers listed in the Continuum of Care (CoC) will play a key role in strengthening the city's institutional support network.

### **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 continues to collaborate with Broward County's nonprofit organizations to provide shelter and

transitional housing for homeless individuals, including those in Pembroke Pines. The city is committed to working closely with the County and homeless service providers to support a coordinated strategy for increasing shelter availability for families and individuals in need. Additionally, the city's Police Department plays a role in assisting homeless individuals and families encountered on city streets by directing them to emergency shelters and food resources. However, the department does not currently track these interactions.

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

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

The city does not offer project-based public housing. However, it provides information on public housing options, including Section 8, in response to inquiries. This information is primarily provided by the city's program administrator, who also refers clients to the Broward County 211 Help Line for additional support.

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

The city promotes homeownership by sharing information about available homebuyer assistance through its website and program administrator. Additionally, in collaboration with local housing authorities, the city provides outreach, public notices, workshops, and other opportunities to encourage participation in homeownership initiatives.

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

The City of Pembroke Pines does not have its own public housing authority. However, it maintains ongoing coordination with the Broward County Housing Authority to address the needs of the county's public housing residents.

## **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 Pembroke Pines, as a recipient of State Housing Initiatives Partnership (SHIP) funds, established an Affordable Housing Advisory Committee (AHAC) in 2008, in accordance with Florida Statute Section 420.9076. The AHAC is responsible for reviewing and evaluating local plans, policies, procedures, land development regulations, the Comprehensive Plan, and other housing activities that impact the production of affordable housing. The committee's work aims to identify and address land use controls, tax policies, zoning ordinances, building codes, fees and charges, growth limitations, and other policies that could act as barriers to affordable housing.

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

To improve the quality of housing for its residents, the City of Pembroke Pines has implemented a Residential Rehabilitation Program. This program addresses code violations, health and safety repairs, and energy efficiency improvements in homes. The program is designed not only to address current repair needs but also to prevent the deferred maintenance of the city's affordable housing stock. Special needs households, including the elderly and disabled, are given priority for accessibility-related repairs under this initiative.

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

The City of Pembroke Pines actively works to identify and address lead-based paint hazards in housing. On an annual basis, the city contracts with the Broward County Public Health Department to evaluate potential lead-based paint hazards in local homes. If lead exposure is detected, the city provides funding for lead testing through its CDBG and SHIP housing rehabilitation programs.

Additionally, in response to increased federal emphasis on eliminating lead dust, new regulations regarding final clearance procedures have been established. For homes built before January 1, 1978, all lead-based paint must either be stabilized or removed, and dust testing must be conducted after any paint disturbance to ensure the home is lead-safe. To inform residents seeking rehabilitation assistance, the city distributes the pamphlet *Protect Your Family from Lead in Your Home*, which educates homeowners about the risks of lead exposure and its effects on both adults and children. All homes receiving CDBG funds that meet lead-based paint criteria are tested for lead hazards.

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

The City of Pembroke Pines employs a comprehensive anti-poverty strategy aimed at providing education, employment opportunities, and access to essential services for its residents. This strategy is carried out through the city's charter school system, coordinated community development programs, housing

initiatives, and local transportation services. By increasing access to education and resources, the city works to improve the quality of life and economic opportunities for low- and moderate-income households.

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

During Program Year 2023, the city partnered with local non-profit housing and social service providers to develop and enhance the County's collective system.

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

The City of Pembroke Pines fosters strong partnerships with a variety of local non-profit organizations and public housing providers.

**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 Pembroke Pines undertook the following Fair Housing Activities in Fiscal Year 2023-2024 to address the impediments identified in the jurisdiction's analysis of impediments to fair housing choice. These activities include:

- Maintained Fair Housing posters (in Spanish and English) displayed in City facilities, including the Community Services Department and the Community Redevelopment Associates of Florida, Inc. (CRAFLA) office.
- Educated the public on fair housing laws through the City's local newspaper and electronic platforms, such as social media. The Community Redevelopment Associates of Florida, Inc. (CRAFLA) also provided educational videos on their website.
- Provided Fair Housing information on the City's website for residents, including contact details for the Broward County Civil Rights Division and the HUD Miami Field Office - Fair Housing and Equal Opportunity.

## **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 Pembroke Pines continues to oversee activities under its federal grant program and develops monitoring plans for new programs as they arise to ensure compliance with specific requirements. Key elements of the monitoring plan include:

1. **Contractor Selection and Agreement:** Selecting a contractor and negotiating a project-specific agreement that clearly identifies and quantifies the activities to be implemented, along with a budget detailing authorized expenditures.
2. **Monthly Status Reports:** Requiring monthly status reports from contractors and establishing an onsite monitoring schedule based on the nature and complexity of the activity and the amount of funding involved.
3. **Technical Assistance and Training:** Providing technical assistance and training when contractors request support, ensuring they have the resources necessary to meet the program requirements.
4. **Payment Review:** Reviewing requests for payment or reimbursement to ensure that proper documentation is provided, and expenditures comply with applicable rules, regulations, and the subrecipient agreement.
5. **Audit Compliance:** Ensuring that contractors meet federal single audit requirements and reviewing audit findings to address any concerns that may arise.
6. **Program Requirement Compliance:** Monitoring compliance with other program requirements, such as labor standards and fair housing laws, through thorough program reviews and ongoing oversight.

## **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.**

During the public comment period, which is set from November 18, 2024, to December 3, 2024, citizens will have the opportunity to provide feedback on the PY 2023 CAPER. All comments received will be carefully considered and summarized accordingly.



**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 will continue to address the priority needs identified in the new Consolidated Plan through the approved activities for the 2025 Program Year. No changes have been made to the program objectives, and the city does not anticipate any changes at this time based on current experiences.

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

No, the city does not have any open Brownfields Economic Development Initiative (BEDI) grants.

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

Not applicable.

### 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	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

**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**