

# **HUD Consolidated Annual Performance & Evaluation Report (CAPER)**

**October 1, 2024 – September 30, 2025**

**US Department of Housing & Urban Development  
Community Development Block Grant (CDBG) Program**



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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.

During this program year, the Town of Manchester expended \$661,466.44 in pursuit of goals identified in the Strategic Plan and the Annual Action Plan. All expenditures during this program year supported projects benefiting low- and moderate-income residents. Public service expenditures totaled 11.53%, comfortably below the 15% cap for this category. Administrative expenses, capped at 20%, were kept to 19.34% of total expenditures. Of the 7 projects funded, 4 were completed by the close of the program year. The remaining 3 are capital projects that will carry over to the next program year.

Manchester received a total of \$812,580 in CDBG-CV funding: \$337,156 through round 1 and \$475,424 in round 3. In total, Manchester has expended \$710,832.87 of its CDBG-CV allocation. To date, 100% of this funding has been used to benefit low/moderate income residents with 78.44% spent on public service expenditures and 5.35% on administration.

Last year, our remaining CDBG-CV funds were dedicated to a Technology Access and Education Program to provide seniors with the ability to access and effectively use various forms of technology. This will enable seniors to stay virtually connected to friends and family, access remote healthcare, create reminders for medication/appointments/etc., and much more. This is important as our ageing population is more at-risk of contracting the flu, Covid or any other future widespread illnesses; access to technology can help avoid exposure while still remaining connected to the world. Funds were expended during this program year to expand the capacity and equipment for the Senior Center's technology and computer room. To date, the Human Services Department has spent \$11,663.56 in support of this program. We are awaiting accomplishment data to draw these funds down in IDIS. We anticipate all remaining CV funds will be spent in support of this program during the upcoming program year.

This year, we saw an increase in the number of public service applications. Whereas 4 were received two years ago and 5 last year, this year we had 8 applications subject to the 15% public service cap. We expect to see a higher number of applicants next year as well, due to the increasingly limited funding options available for such projects.

The Community Development Block Grant is a critical funding resource for programs serving Manchester's lower-income residents. These funds ensure the availability, affordability and improved quality of services and housing within town.

### **Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and**

**explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Economic Development	Non-Housing Community Development	CDBG: \$0	Facade treatment/business building rehabilitation	Business	2	0	0.00%	0	0	0.00%
Housing: Improve Quality of Affordable Stock	Affordable Housing Public Housing	CDBG: \$17,006.20	Rental units rehabilitated	Household Housing Unit	18	46	255.56%	2	8	400.00%
Housing: Improve Quality of Affordable Stock	Affordable Housing Public Housing	CDBG: \$296,585.50	Homeowner Housing Rehabilitated	Household Housing Unit	97	193	199%	16	40	250.00%
Housing: Improve Quality of Affordable Stock	Affordable Housing Public Housing	CDBG: \$0	Housing for Homeless added	Household Housing Unit	0	0	0.00%	0	0	0.00%

Housing: Improve Quality of Affordable Stock	Affordable Housing Public Housing	CDBG: \$0	Housing for People with HIV/AIDS added	Household Housing Unit	0	0	0.00%	0	0	0.00%
Planning and Administration	Administration	CDBG: \$112,009.13 CDBG-CV: \$2,693.52	Other	Other	1	1	100.00%	1	1	100.00%
Public Facilities: Maintain, Improve or Repurpose	Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	14672	586.88%	0	0	0.00%
Public Facilities: Maintain, Improve or Repurpose	Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	4	4	100.00%	0	0	0.00%
Public Improvements	Non-Housing Community Development	CDBG: \$160,828.43 / CDBG-CV: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5600	22695	405%	5,385	5,385	100.00%

Public Services: Provide to Low/Mod Residents	Homeless Non-Homeless Special Needs	CDBG: \$66,576.39/ CDBG-CV: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1540	4588	298%	822	912	111%
Public Services: Provide to Low/Mod Residents	Homeless Non-Homeless Special Needs	CDBG: \$0/ CDBG-CV: \$0	Homelessness Prevention	Persons Assisted	0	0	0.00%	0	0	0.00%

**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.**

Maintaining and improving Manchester's affordable housing has been, and continues to be, of the utmost priority. The Housing Rehab Program and Rebuilding Together's roofing program continue to improve the safety and quality of housing units in Manchester. The high cost of materials and labor left many lower-income residents unable to afford repairs. This also led to increased project costs for both programs, thereby limiting the number of residents we could assist. This scenario is expected to carry over into the next program year.

There remains a critical need for quality, affordable owner- and renter-occupied housing. The previously mentioned housing programs fill a crucial need for residents in our community. Housing costs remain exceedingly high, which makes it increasingly challenging for lower-income residents to meet basic needs. When an emergency such as a failed boiler or leaking roof creates an even greater financial and emotional strain on residents, there are programs to turn to for assistance. Information about the programs has been widely distributed over the years, so an increasing number of residents and area contractors are aware of these community resources.

The Water Line Replacement Program has been designed to replace leaded lines that pose a health risk to a property's occupants, particularly when the town-owned side of the water line has been replaced. Another housing safety related program, the Smoke and CO Detector Program,

continues to improve the safety of lower-income Manchester owner- and renter-occupied households.

Continued support for public service projects is also of great importance. Manchester has a strong network of community organizations and town departments serving subpopulations such as the homeless, seniors, residents with mental health issues, lower-income youth and families, and survivors of domestic violence. Each year, we have an opportunity to expand capacity by providing CDBG funds to support local nonprofit and departmental initiatives. As funding opportunities decrease, the continued availability of CDBG funds will be even more critical.

## **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	996
Black or African American	707
Asian	21
American Indian or American Native	3
Native Hawaiian or Other Pacific Islander	1
<b>Total</b>	<b>1,728</b>
Hispanic	410
Not Hispanic	1,318

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

### **Narrative**

Other racial groups served this program year but not represented in the table above include the following: Black/African American & White (4), Asian & White (1), American Indian/Alaskan Native & Black/African American (1) and Other Multi-Racial (261). The total number of households/individuals who were direct beneficiaries of CDBG-funded programs this year was 1,993. To provide additional context regarding beneficiaries, 15 households served through CDBG-funded housing projects were female-headed.

## 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	\$565,198	\$661,466.44

Table 3 - Resources Made Available

### Narrative

Manchester received \$565,198 in CDBG funding for the 2024-2025 program year. The amount expended reflects completion of projects funded during this program year as well as capital projects that spanned over multiple years, which is why expenditures exceeded the grant amount. In total, we spent \$661,466.44 on all projects.

The town also continues to draw down CDBG-CV funds (\$812,580 received in total) to prepare for, prevent and respond to Covid-19. Manchester has spent \$710,832.87 of CDBG-CV funds. We are working to encourage completion of the last project – a senior technology program - to expend the remaining CDBG-CV funds.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
MANCHESTER HOUSING REHABILITATION AREA	11%	13.55%	Actual percentage is slightly higher than planned percentage.

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The town has designated a target eligible area for the Housing Rehab Program to maximize impact within these CDBG-eligible neighborhoods. The planned percentage of allocation was based on funding dedicated to this year's Rehab Program. Compared to the overall entitlement grant, it was anticipated that 11% (\$62,171.78 of \$565,198) would be spent rehabilitating properties within the target area.

The “Actual Percentage of Allocation” represents the cost of all housing projects completed within the target eligible area. This calculation includes projects completed by the Housing Rehab Program, Rebuilding Together’s roof replacement projects and Leaded Water Line Replacement projects. All three programs are included in this calculation because they represent investments made in the housing stock within the target area. By the close of the program year, \$76,593 was invested by these programs in the eligible area. None of these programs are forced to adhere to the boundaries of the Housing Rehab Eligible Area, which is intended only for lead/code-related Housing Rehab projects. The amount invested within those boundaries, though, shows the town’s continued investment in its older housing stock and in properties occupied by lower-income residents.

### 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 chart below outlines funds leveraged by sub-recipients in support of CDBG-funded projects:

<u>PROJECT</u>	<u>LEVERAGED FUNDS</u>	<u>SOURCE</u>
163 Spruce St. Parking Lot	\$48,815	Public Works Department contribution from various sources
Interval House	\$681,106	Government/foundation/corporate grants and fundraising
Partnership to End Human Trafficking	\$200,000	Foundation grant and private fundraising
The Health Collective	\$23,013	Foundation support and general operating budget
<b>TOTAL</b>	<b>\$952,934</b>	

Leveraging program funds is now more important than ever. Materials and staff continue to be in short supply and costs for both remain high. Each year, Manchester is fortunate to have CDBG sub-recipients who contribute additional funds to expand project capacity.

In total, at least \$952,934 was leveraged by CDBG funds to benefit low- and moderate-income Manchester residents.

## 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	7	10
Number of Non-Homeless households to be provided affordable housing units	18	24
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>25</b>	<b>34</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	18	38
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>18</b>	<b>38</b>

**Table 6 – Number of Households Supported**

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

PEHT's Transitional Residential Program estimated they could provide housing to approximately 7 residents during the program year. In reality, they assisted 10 eligible individuals with housing and support services. The *continued* affordability of 24 non-homeless households was maintained this program year. The one-year goal outlined in Table 5 was misleading, as it duplicated the number of households supported through rehabilitation shown in Table 6. For the sake of consistency, we reported actual accomplishments in the same manner by reporting units for which affordability was maintained. The Housing Rehab Program (14 units) and Rebuilding Together's roofing program (10 units) both use encumbrances to secure the ongoing affordability of units assisted.

In total, 24 households were assisted by the rehabilitation efforts of the Housing Rehab Program and Rebuilding Together. The Smoke & CO Detector program assisted another 14 units through the installation of detectors to ensure the ongoing safety of each property's residents. Projects completed by the Leaded Water Line Program were not included in this total as those projects were completed on

the exterior of each property.

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

In terms of supporting households through rental assistance, Manchester's housing authority uses small area fair market rents (FMR). This hinders the housing authority's ability to fund as many vouchers as they would otherwise be able to subsidize. While small area FMR enables lower-income residents to afford rental units in "high opportunity" areas, funding levels have not increased to cover the additional cost of these vouchers. As a result, they cannot assist as many households as the need for affordable housing increases each year.

High material and labor costs continue to strain all households, but lower-income ones in particular. This, along with numerous other financial challenges, will hinder lower-income households from affording necessary upkeep to their homes. We have seen high demand for emergency replacement assistance and roof replacements over the past few years. Unfortunately, we anticipate this demand will continue throughout the next program year.

Skyrocketing material costs continue to impact program output. The Housing Rehab Program was hindered by project costs that exceeded the program's cap and limited overall funding for the program. The program focused on emergency replacements, to assist residents in situations that threatened their health and/or safety. Rebuilding Together continues to see extremely high costs for roof materials and their waitlist continues to grow, particularly with residents whose insurance companies threatened to cancel coverage unless their roof was replaced.

In general, we expect demand to remain elevated for all housing-related programs. The increased number of inquiries for assistance shows these programs fill a crucial need within the community. We hope to continue funding for the Housing Rehab Program and Rebuilding Together while also exploring other opportunities to support residents' ability to maintain their homes and improve the quality of the town's affordable housing supply.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	14	0
Low-income	21	0
Moderate-income	12	0
<b>Total</b>	<b>47</b>	<b>0</b>

Table 7 – Number of Households Served

**Narrative Information**

The figures in the chart above represent households assisted through the following CDBG activities: the Housing Rehab Program, Rebuilding Together's roofing program, the Water Line Replacement Program and the CO Detector Program.

Manchester does not receive HOME funds so that section of the chart is not applicable.

## **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**

MACC's Community Outreach Program is a vital resource in Manchester and is funded by the Town and other sources. The Outreach Worker meets with unsheltered residents in the field and with visitors to MACC's food pantry, soup kitchen, and shower and laundry facilities. During the 2024-2025 Program Year, 287 unsheltered/homeless referrals were made and MACC responded to 2,420 emergency service calls.

The Outreach Worker is frequently accompanied by the police department's Community Outreach Officer to maintain a network of support and understanding between the town's homeless, social service agencies and the police department. This year, the addition of a UTV vehicle enabled MACC and MPD to access encampments in locations that were hidden or otherwise difficult to reach. When meeting with a homeless resident, an assessment of each individual's needs is completed, and follow-up appointments are scheduled as necessary. Attempts were made – particularly with unsheltered homeless – to make connections with housing and other resources and services. As part of a regional outreach program, a state-funded PATH program clinician also provides homeless outreach in Manchester.

MACC and Senior Adult and Family Services (SAFS) staff also frequently meet with homeless individuals and families to make connections to housing and other resources. MACC, PATH and SAFS hold monthly meetings to maintain a network of assistance for the homeless. Estimates show there are now more than 60 homeless people in Manchester on any given day. This figure has increased significantly over the last 6 years. Manchester offers supports not available in many other towns, so many homeless travel here to benefit from the town's services.

Journey Home, a regional organization focused on addressing homeless issues, also maintains a presence in Manchester and actively participates in local CoC meetings. In partnership with the Youth Service Bureau, Journey Home continues a pilot program focused on youth homelessness in town.

The majority of Manchester's sworn police officers – 65 of 103 officers - have been trained through the Crisis Intervention Team (CIT) program. This figure does not include officers currently in the academy or actively enrolled in training. The program educates officers about safe and effective methods for responding to people in psychiatric distress. Instead of immediately arresting the individual, officers learn ways to diffuse situations and connect them with mental health services.

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

Since the MACC shelter closed years ago, there is no emergency shelter located in Manchester. The primary resource for shelter bed referrals is the state-wide 211 system; MACC and the town's Senior Adult and Family Services Department (SAFS) assist individuals with navigating the referral system.

This past winter, the town and MACC continued their collaborative effort to provide temporary housing for unsheltered homeless in hotel rooms during the winter warming season. For the past two winters,

ARPA funds allocated by town Board of Directors and MACC supplemental funds were used to financially support this project. Overall, 51 unduplicated clients were served by over 3,000 hours of shelter staff/monitor hours providing 24/7 coverage.

Interval House's emergency Safe House shelter was full throughout the program year. The Safe House provided over 8,500 bed nights to victims of domestic violence and their children and operated at an average 113% capacity over the course of the year. Identifying affordable and safe housing opportunities remained a significant challenge for clients. Inflation, rising rental costs, and landlords and utility companies requiring sizeable financial deposits all contributed to a difficult housing market. Many Covid-era assistance programs, as well as the State Department of Social Services' cash assistance program for survivors of domestic violence expired or were repurposed during this program year, limiting resources further. The waitlist for domestic violence rapid rehousing assistance remained lengthy, but Interval House advocates worked hard to identify creative housing solutions for victims, and to help clients overcome the financial barriers whenever possible.

Veterans, Inc., the VA and 211 continue efforts to connect homeless Veterans with transitional and permanent housing. The VA was able to offer financial assistance with 1<sup>st</sup> month's rent and back rent payments.

**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**

Five 2-bedroom units at CHR's Center St. Apartments II are designated as child welfare units for homeless/at-risk youth. This property has on-site staff to assist residents – which include the aforementioned youth, formerly homeless residents, Veterans and individuals with a mental health diagnosis, among others – and connect them with social services to meet their needs.

Many local groups assist low-income households trying to avoid homelessness. MACC assists very low-income residents visiting their soup kitchen or food pantry by arranging a meeting with an outreach worker who can create connections with available programs and services. Veterans, Inc. assists Veterans being discharged from transitional housing to secure more permanent housing. SAFS will assist any type of household in need – low-income seniors, individuals with a mental health diagnosis, domestic violence victims, etc. They also provide direct assistance to residents displaced through circumstances such as fires or situations deemed by the building department as unsafe for habitation. Interval House provides survivors of domestic violence with temporary housing and assists in ensuring a transition to long-term safe housing. CHR's Promise House provides housing to youth aging out of foster care so they can avoid homelessness.

Second Chance Re-entry Initiative Program (SCRIP, Inc.) owns a property in Manchester that operates as transitional living for formerly incarcerated persons integrating back into the community. They provide housing and holistic services to help set participants up for success in their transition. Individuals living at the facility are provided support services to help rebuild relationships, deal with trauma, gain and maintain employment and, over time, become self-sufficient. They are also assisted in finding and securing long-term housing when they complete their time in the program.

The Partnership to End Human Trafficking has been actively assisting resident survivors of human trafficking or sexual assault by providing transitional housing and support services to get their lives back in order. CDBG funds were used this year to fund staff at the transitional housing location. PEHT's housing and service programs are designed to serve the most vulnerable populations and 100% of participants assisted this year lived below the poverty line.

**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 town provided a Certificate of Consistency to the CT Balance of State CoC in support of their application for new and continued statewide funding. BoS projects relevant to Manchester included rapid rehousing, youth homeless diversion, permanent supportive housing, and rapid rehousing assistance to homeless families with survivors of domestic violence.

In partnership with other area nonprofits, Journey Home continues to run a youth homelessness demonstration project for youth ages 18-24. The definition of "homeless", as applied to this project, was expanded to include any youth 14 days from being homeless. Limited rental assistance and security deposit money was available to participants. Journey Home continues its work with Manchester's Youth Service Bureau to identify the extent of youth homelessness in town, develop effective means to connect with youth experiencing homelessness and provide them with access to resources.

Veterans, Inc. and the VA continue to maintain an active presence in Manchester. Veterans, Inc. continues efforts to assist formerly homeless Veterans transitioning into the general rental market and with securing employment. The VA had rapid rehousing vouchers they were able to use to assist Vets in securing rental housing. Both groups also participate in the local Continuum of Care.

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

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

Public housing within the Town of Manchester is administered by the Manchester Housing Authority (MHA). The MHA currently has 244 public housing units, 80 state elderly units, 37 state congregate units, and an allocation of 535 housing choice vouchers in their inventory. Additionally, the MHA manages roughly an additional 2,000 vouchers for the State of CT Department of Housing.

During this program year, extensive growth occurred within the MHA. First, there was doubling of the state allocation of vouchers through DOH. Second, with the addition of a Low-Income Housing Tax Credit (LIHTC) compliant property manager, the MHA was able to take over management of Spencer Village, and 80-unit state elderly development. This expansion, addition, and experience with LIHTC funding sources will allow the MHA to pursue a goal of developing additional affordable units through its subsidiary non-profit entity to provide much needed additional housing stock within Manchester.

To further sustain the portfolio of affordable housing in Manchester, HUD approved the MHA's second round application for the Rental Assistance Demonstration (RAD) program in May of 2025. The complete transition out of the Public Housing program is planned for late 2026. Concurring with the closure of the final round, a large-scale project is planned for our entire affordable housing portfolio to address modernization and predicted capital needs. Further information on the program and the strategy to preserve and improve public and affordable housing properties can be found at <https://www.hud.gov/RAD>.

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

The housing authority maintains a Resident Advisory Board (RAB) consisting of one representative from each MHA property – including scattered site units - that meets quarterly to address any concerns that arise.

The housing authority's Board of Commissioners, by construct, must always include a tenant commissioner from a federally funded property to provide a voice for resident concerns.

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

This section is not applicable as the Manchester Housing Authority continues to operate as a "High Performer" based upon HUD's Public Housing Assessment System (PHAS).

## **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)**

There is limited developable land remaining in Manchester. Remaining lots tend to present challenges such as environmental impacts or lack of direct connection to existing water and sewer mains. Opportunities for redevelopment exist but present significant financing hurdles for developers.

During Program Year 2024–2025, Manchester began participating in two major regional initiatives aimed at removing or reducing the negative effects of public policies that can create barriers to affordable and attainable housing. Both efforts are being led by the Capitol Region Council of Governments (CRCOG) and are designed to strengthen local capacity while promoting coordinated regional action.

First, Manchester joined CRCOG's multi-year Regional Housing Strategy, an effort focused on developing practical tools and resources that help municipalities implement their Affordable Housing Plans and advance shared housing goals. Rather than producing another standalone plan, this initiative is generating training materials, model approaches, and other implementation tools that build upon the housing strategies in the CRCOG 2024 Plan of Conservation and Development and in locally adopted Affordable Housing Plans. Staff from Manchester have participated in this work, and members of the Housing & Fair Rent Commission attended one of CRCOG's regional public engagement events.

Manchester also began participating in CRCOG's new Regional Fair Rent Commission Initiative, which aims to strengthen tenant protections and improve municipal capacity to meet fair rent requirements. Following a regional survey showing strong municipal interest, CRCOG is convening towns bi-weekly to explore and design a shared regional Fair Rent Commission model. This approach would streamline administration, improve response times to complaints, and promote more consistent enforcement of fair rent standards across communities. Manchester staff are engaged in these discussions, with regular meetings planned through June 2026.

Together, these regional collaborations demonstrate Manchester's commitment to addressing structural barriers to affordable housing and expanding housing options through coordinated, multi-jurisdictional efforts.

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

Typically, the primary obstacle is a lack of funding to address the level of need. The imbalance between supply and demand became even more exacerbated this year. Programs have been eliminated and nonprofits, as well as local and state governments, are facing severe funding cuts. Inflation, combined with a challenging job market, has led to a drastic increase in demand for the reduced number of services available. The Town of Manchester and its community partners continue to use a collaborative approach to address these challenges and get as much assistance to residents as possible.

Since 2022, the Board of Directors has dedicated ARPA funds to support the town's winter warming initiative. The Town and MACC continue to collaboratively operate a non-congregate model at a local motel to provide 24-hour housing to unsheltered residents. Participants are also connected with

housing, medical, employment and mental health/addiction support services. ARPA funding is expected to be fully expended after the upcoming winter season.

The Human Services Department received \$20,000 of CDBG funding to run a Hoarding Remediation Program. This program was designed to provide home cleanouts to prevent properties from being deemed uninhabitable and enable people to remain in their home. The program successfully assisted two homeowners during the program year. Efforts to help others were curtailed by staff turnover and the need for two rounds of bidding which significantly delayed the program's start date to the final month of the program year.

As of Spring 2021, Manchester became the first town in the country to hire a professional recovery coach to assist residents suffering from addiction. The police and human services departments recognized that many 911 calls were situations that necessitated support services rather than police response. Human Services provides the police department with hotel vouchers to distribute to individuals assisted during non-office hours who are in immediate need of housing. The departments work collaboratively and modify efforts to adapt to types and levels of need.

Rebuilding Together runs a program to install temporary handicap ramps at Manchester homes. This enables disabled persons to age in place and safely leave their residence for appointments or other outings. When the ramp is no longer needed at a property, it can be removed and relocated to another home. This saves both the resident and Rebuilding Together the cost of installing a permanent ramp.

MACC runs a catering business that has proven very successful and has built a strong reputation. For more than 5 years, they have held a catering contract to provide daily meals at the town's Senior Center. Sit down or take-home lunches are offered Monday – Friday and serve 70-100 people per day.

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

The town continues to dedicate annual CDBG funding to run a housing rehabilitation program. This program year, we worked through the application process for a 3-family property. The preliminary assessment indicated project costs would significantly exceed our spending cap and we did not have sufficient funds to cover the expenses anyway. The owner-investor planned to address the most significant issues using RRP contractors paid through their own means.

Manchester's Housing Rehab funds are sometimes leveraged through partner projects with CCHHP's lead, and when available, healthy homes funding. Additionally, CCHHP funds their own lead projects in Manchester using federal OLHCHH and state funding. During this program year, CCHHP's total investment in lead safe housing in Manchester was \$71,844.

The Health Department distributes information on the dangers of lead paint in town hall, the Health Department and at various fairs and events. As of January 2025, the elevated blood lead level threshold for action dropped from 5 mg/dl to 3.5 mg/dl. This has resulted in a significant increase in cases requiring Health Department staff to perform lead inspections and investigate lead orders. Households that may qualify for assistance – especially in situations involving lead poisoned children – are referred to CCHHP or the Housing Rehab Program. Follow-up and tracking are performed for any abatement orders.

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

Efforts to assist families trying to lift themselves out of poverty are very challenging due to wages that do not match the increased cost of living and the extremely tight housing market for both renters and homeowners. According to the Partnership for Strong Communities' Housing Data Profiles for 2025, Manchester's housing wage is \$31.81 which means a significant portion of lower-income households' wages must be dedicated to paying rent or the mortgage.

Manchester Adult and Continuing Education continues to work closely with the local branch of the American Job Center to assist residents to transition from training to employment.

This year, CDBG funds were used to support the Partnership to End Human Trafficking's transitional residential program. This program not only provides temporary housing, participants also receive assistance identifying employment opportunities and trying to secure permanent affordable housing.

Interval House connects survivors of domestic violence with housing and other resources to re-start after an abusive situation. The organization provides temporary housing and connects people with job opportunities, permanent housing and builds their self-esteem to help them succeed.

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

Town staff continuously strive for enhanced coordination and communication to better serve the residents of Manchester. One example of this is the local Continuum of Care, which provides a valuable forum for the exchange of information and sharing of resources, training and coordination of efforts.

The Manchester Community Services Council (MCSC) is another example of a coordinated effort between town staff, nonprofits, private institutions and concerned citizens to unite, inform and address issues that impact the health, economic and housing situations of Manchester's lower-income residents.

The Town continues to work with Community Outcomes, LLC, a consulting company, to efficiently spend the last remaining CDBG-CV funds in a compliant manner that best serves Manchester residents.

The Dentistry for Seniors program, offered by The Health Collective, provided a new avenue for increasing institutional structure. The Health Collective was a new subrecipient seeking to expand their offerings and impact on residents of Manchester. This program required extensive coordination with the town's Senior Center to offer dental services to seniors where they already gathered.

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

Squire Village, a privately-owned project-based Section 8 property, is an example of a truly collaborative process to ensure the provision of quality affordable housing. The Town signed a 15-year property tax agreement with the property owner, Jonathan Rose Companies. The police department maintains a "community service" presence at Squire Village – operating an on-site substation, participating in social events and working to develop a level of trust with residents in an effort to provide an improved sense of safety. The Board of Education and local social service agencies maintain numerous programmatic connections with the Squire Village community. Foodshare also visits the complex every other week as part of their mobile food distribution schedule.

For worst-case housing needs, SAFS maintains a list of local landlords with affordable units, including those who will rent to households with eviction records or very poor credit while still charging an

affordable rent. SAFS staff work tirelessly to place low-income renters in sustainable housing situations, despite numerous challenges in an extremely tight rental market. In addition, both MACC and SAFS have programs to assist with security deposits and rent for households in emergency situations.

For years now, MISAC has provided a grant to SAFS to fund security deposits for lower-income renters in the private market. This has enabled SAFS to secure housing for residents who would not otherwise have the means of paying security deposits that frequently cost 1.5-2 times the monthly rent.

Organizations such as Veterans, Inc. and CHR try to identify landlords willing to work with their clientele and provide affordable housing. They then assist residents to transition into these units and provide social service supports as needed.

Promise House, completed five years ago and housing formerly homeless youth, is another example of a successful collaborative effort. CHR handled construction and management, and external funding was secured for individual units. MHA provides Section 8 vouchers to subsidize 3 units with the requirement that those assisted are from Manchester. MISAC pledged to subsidize 10 years of operating expenses for 3 units. Additional operating funds were requested from the state.

The Executive Director, Deputy Executive Director and Resident Services Coordinator of the local housing authority maintain contact with the town, especially the Planning, Human Services and Fire Departments, to address common goals. MHA representatives also participate in town-staffed groups related to affordable housing, such as the Continuum of Care, the Manchester Community Service Council and the Housing and Fair Rent Commission.

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

IMPEDIMENT 1: Although housing discrimination is not visible or prominent in Manchester, it may still exist. ACTION 1: Human Services funds agencies such as CRT and MARC, Inc. (serving the disabled). MACC provides counseling on how to be a good tenant. The Community Development Program Manager links residents needing assistance to the CT Fair Housing Center and CHRO. ACTION 2: The Town Attorney is the Fair Rent point of contact for residents who feel their rent has been unjustly increased or is excessive. When formal complaints are received, the Town Attorney tries to mediate between landlord and renter. If unsuccessful, the case is taken up by the Fair Rent Commission; Housing Court is the last resort. The Town received 27 fair rent complaints this year. Thirteen resulted in hearings: 2 were favorable to the tenant, 7 to the landlord and two came to a mutually agreed-upon rent level. One case is still pending. The remaining 13 complaints were resolved with help from the Town Attorney's office. ACTION 3: The Town's Human Services Directory is a clearinghouse of resources for residents. The publication provides contact info for Statewide Legal Services, housing resources, evictions, landlord/tenant issues and other housing-related topics. ACTION 4: A list is maintained identifying town staff that speak various languages who can assist in translating between staff and residents. IMPEDIMENT 2: The cost of security deposits, down payments and closing costs make housing unaffordable for many residents. ACTION 1: MISAC continues to provide SAFS with funding to assist with security deposits. ACTION 2: Veterans, Inc. identifies eligible Veterans who qualify for rent and security deposit assistance. ACTION 3: MACC offers a wide range of emergency assistance including security deposit, rent and utility assistance. IMPEDIMENT 3: There are limited housing opportunities for the homeless, at-risk and special needs populations. ACTION 1: Factors include a lack of housing supply, high cost of owning and renting and the cost of construction, particularly with limited subsidies and funding for support services. CoC members maintain partnerships to secure resources, provide references and

collaborate to address shortfalls. ACTION 2: Zoning regulations do not define "supportive housing" as a separate housing type. The PZC believes people are living independently whether in an apartment, condo or single-family home, even when tied to support services. ACTION 3: Manchester is exempt from the Affordable Housing Appeals List. The list was developed to encourage towns to ensure at least 10% of their housing is "affordable" through restrictive deeds, CHFA mortgages or government-assisted housing for low/mod-income residents. In 2024, 14.45% of the town's housing met these criteria. This definition is limited and does not reflect the full range of affordable housing in town. It does generally prove that Manchester strives to provide housing for ALL residents.

## **CR-40 - Monitoring 91.220 and 91.230**

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

We welcome participation from all eligible businesses/consultants/contractors in CDBG-funded activities. The Rehab Program's pre-qualified contractor list includes MBE companies who actively participate in bid walks. Advertising larger-scale capital project bid opportunities has been challenging as MBE and DBE-focused print and online publications within the state have almost all completely shut down operations. We advertise on the state bid list since it provides access to the most widespread and diverse group of contractors.

Projects are monitored through subrecipients' quarterly Service Utilization reports. These reports provide quantitative data on unduplicated individuals served each quarter, race/ethnicity data and an income breakdown of those served. Sub-recipients also submit a narrative describing activities, progress made towards goals and obstacles faced during the quarter. At the end of the program year, they submit a narrative on the year's goals and accomplishments and changes they would make to the program, were it to be funded again. Invoices submitted to the Town must include supporting documentation for the charges such as timesheets, paystubs, and detailed invoices.

In-depth monitoring is performed each year to ensure proper record keeping and compliance with federal requirements. This year, PEHT was subject to a virtual, in-depth monitoring. CDBG funds helped pay for a part-time residential counselor at their temporary housing site. The organization's primary funding source is the DOJ, so they are familiar with federal funding requirements and regulations. They are subject to DOJ monitoring and are, therefore, diligent about ensuring compliance with federal awards. PEHT does not meet the federal funding threshold for a A-133 audit, but they still provided a lower threshold audit for the Town's review. Their primary area for improvement was related to timely submission of invoices and quick follow-up to requests for additional information and documentation. The organization did stay on budget and submitted required reports in a timely manner. PEHT will receive CDBG funding during the upcoming program year with the expectation that they will continue to meet or exceed compliance standards while improving responsiveness to questions about quarterly invoices.

Town capital projects (ie: sidewalk projects) are subject to on-site monitoring by the assigned Construction Inspector. Pre-construction meetings are held to review requirements, including those related to CDBG funding. On-site employee interviews are completed for each project. Invoices are

reviewed by the Chief Construction Inspector and payrolls are reviewed by the Community Development Program Manager.

Internal town departments and capital improvement projects submit for reimbursement as invoices are received, which allows for greater internal controls over line-item spending and review of eligible costs. External agencies performing public service projects submit invoices with quarterly reports. This allows for review of timesheets as documentation for staffing charges prior to payment of the invoice. Questions are resolved through discussions with the sub-recipient prior to payment being issued. All invoices related to CDBG require sign-off from the Community Development Program Manager and the Director of Planning before they are processed for payment. Overall, the same procedures were used for CDBG-CV expenditures but with the use of a consultant to monitor expenditures and eligibility and to provide technical assistance.

Frequent communication and technical assistance provide a better understanding of CDBG funding regulations. Sub-recipients are accustomed to asking the Program Manager questions before acting and have a heightened awareness of their obligations under the Sub-recipient Agreement.

### **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.**

The 50<sup>th</sup> Program Year CAPER was made available for public review on the town's website. Hard copies were made available upon request.

A public notice was published in the Journal Inquirer following notification requirements described in Manchester's Citizen Participation Plan. The notice outlined where residents could view the document, how to request a hard copy and where to direct public comments. It also detailed the time period the document would be made available for public review and comment.

Additionally, a hybrid public hearing was held to provide residents and community organizations the opportunity to review and comment on the CAPER.

No public comments were received in writing or during the public hearing.

### **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.**

There were no changes to the jurisdiction's program objectives during this program year. Prioritization for the allocation of CDBG remained aligned with the 5-year Consolidated Plan.

Unless financial support increases, the Housing Rehabilitation Program will likely be unable to address many general lead/code projects and may focus primarily on emergency replacements. The Program no longer receives sufficient funds to cover both project types, particularly when costs have skyrocketed.

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

Manchester does not have any Brownfields Economic Development Initiative grants.

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

This section is 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	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

**Table 8 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	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.	1				

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

### **Narrative**

These requirements were not applicable to any projects during Manchester's 2024-2025 program year. A good faith effort was still made to advertise public improvement projects to Section 3 companies and to document whether contractors participating in the Housing Rehab and Emergency Replacement Program qualified as Section 3 businesses. Contractors awarded capital improvement projects are notified of Section 3 compliance and opportunities for good faith efforts in their work and are encouraged to work with Section 3 business, regardless of whether the threshold has been met.