

# City of Manitowoc Housing Rehabilitation Loan Program Plan

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For Housing CDBG RLF Funds  
Submitted to Wisconsin Department of Administration  
By City of Manitowoc Community Development Department  
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~~May 22~~ June 15, 2015



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## City of Manitowoc Housing Rehabilitation Loan Program Plan

### I. Program Background

The City of Manitowoc established a housing rehabilitation loan program in 1988 with the award of its first Small Cities Community Development Block Grant (CDBG). Manitowoc is not an entitlement community, so additional awards were sought in order to continue funding the program. Table 1 summarizes CDBG housing grant awards, which total \$4,054,350, provided to the City of Manitowoc, and Table 2 details the use of funds under each grant award.

Table 1: CDBG Grant Award Summary

Grant Amount	Year	Contract
\$397,500	1988	Contract 879-0
\$966,700	1989	Contract 963-2
\$691,150	1991	Contract 91-68H
\$499,000	1992	Contract 83011
\$500,000	1993	Contract 84120
\$500,000	1995	Contract 86161
\$500,000	1997	Contract 87195.15

From 1988 to 2012, the City disbursed a total of \$5,615,310.73 in CDBG loan funds, or 138.5% of grant funds awarded. Projects still active to date include \$2,779,069.44 in loan funds, and a total of \$2,836,241.29 in loan funds have been satisfied over the life of the program.

Table 2: Detailed Use of CDBG Awards by Contract

<b>Contract 879-0 (1988)</b>	
Funds Disbursed:	<b>\$ 397,500.00</b>
Housing Rehab CDBG	\$ 162,500.00
Homestead HOP	\$ 200,000.00
Administration	\$ 35,000.00
<b>Contract 963-2 (1989)</b>	
Funds Disbursed:	<b>\$ 966,700.00</b>
Housing Rehab CDBG	\$ 351,000.00
Marshall St Rehab CDBG	\$ 564,700.00
Administration	\$ 51,000.00
<b>Contract 91-68H (1991)</b>	
Funds Disbursed:	<b>\$ 691,150.00</b>
Housing Rehab CDBG	\$ 541,000.00
Restroom Union Park	\$ 60,000.00
Administration	\$ 90,150.00

**Contract 83011 (1992)**

Funds Disbursed:	<b>\$ 499,000.00</b>
Housing Rehab CDBG	\$ 434,000.00
Administration	\$ 65,000.00

**Contract 84120 (1993)**

Funds Disbursed:	<b>\$ 500,000.00</b>
Housing Rehab CDBG	\$ 435,000.00
Administration	\$ 65,000.00

**Contract 86161 (1995)**

Funds Disbursed:	<b>\$ 500,000.00</b>
Housing Rehab CDBG	\$ 435,000.00
Administration	\$ 65,000.00

**Contract 87195.15 (1997) \$ 500,000.00**

Housing Rehab CDBG	\$ 435,000.00
Administration	\$ 65,000.00

**RLF HOP (CDBG) (1998 - 2005)**

Funds Disbursed:	<b>\$ 333,446.00</b>
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**RLF CDBG (1998 - 2002)**

Funds Disbursed:	<b>\$ 915,095.00</b>
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**RLF CDBG (2002 - 2012)**

Funds Disbursed:	<b>\$ 1,346,537.00</b>
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The current status of the housing rehabilitation loan program is that new loans are not being offered for single-family projects, existing loans are being serviced to the best of the City's ability, and a large portion of the currently available balance is committed to a project known as the "Artist Lofts." The Artist Lofts project involves the renovation of the historic Mirro Plant #3 into a 5 story, loft-style apartment building. The results will be a 40-unit, adaptive reuse, multi-family project that will house low-income households with about a quarter of the units earmarked for veterans. The project has committed funding of nearly \$9 million dollars and is expected to start construction this summer. Funding sources include low income housing and historic preservation tax credits, developer equity, and various state and local loans.

The current CDBG housing fund balance as of April 13, 2015 is \$ 250,605.11. Funds committed to the Artist Lofts total \$177,818.00, leaving \$72,787.11 currently uncommitted and available for new loans. Section II of this plan defines the problem the City's housing loan program is currently facing. Given this legacy of successfully distributing, recovering, and revolving the granted funds, the future of the program is an important question to the City of Manitowoc.

## **II. Problem Definition**

In 2012, 50% of the positions associated with the Community Development Department were eliminated through layoffs. This included elimination of the primary staff resource who administered the City's housing rehabilitation loan program since 1988. As a result, the City was no longer able to offer new loans from March 2012 to the present. The City desires, and the Wisconsin Department of Administration (DOA) requires, this program to be reestablished and for complete services to be offered once again for new and existing loans.

## **III. Goal Clarification**

The City's goals relative to reestablishing the housing rehabilitation loan program include the following:

1. Retain this important community resource for enhancing the city's neighborhoods and creating additional choices for quality affordable housing.
2. Provide the resources to responsibly administer the entire program from application and loan management, to housing and project inspections, to accounting and reporting.
3. Expand program income through additional funding sources and loan repayments.
4. Create an additional City staff position through the reestablished program, if fiscally possible, in order to leverage existing administrative and inspection resources.
5. Add accounting expertise to the program through internal or external resources.
6. If it is not fiscally possible to add City staff, collaborate with external partners to provide the needed skills and capacity.

## **IV. Alternatives Analysis**

The City's focus in the past, and for future planning purposes, will be the Owner-Occupant Rehabilitation Loans program. Other related CDBG programs have been, and will likely continue to be, administered by a partner agency, Lakeshore CAP. These include the Homebuyer Program, Homeless Assistance, and Handicapped Accessibility programs. The Rental Unit Rehabilitation Loans and Acquisition/Relocation components of CDBG housing funds could potentially be administered by the City if the need arises in the future.

### **Revenue Projection**

A revenue and administrative fees projection is necessary in order to assess the feasibility of various alternatives for administration of the Owner-Occupant Rehabilitation Loan program. The DOA *CDBG-Housing Implementation Manual* states that up to 15% of loan repayments deposited into a revolving loan fund (RLF) may be used to administer loans made from the RLF. The City of Manitowoc had recovered administrative fees in the past, but has not utilized this practice in recent years. Given the stated problem and goals, the utilization of administrative fees is a necessary component of the potential solutions.

Table 3 reflects that loan funds repaid in the past vary greatly – from a high annual total of \$222,041 in 2008, to a low annual total of \$30,166 in 2011. Repayments over the last five years have been on a downward trend, mainly reflecting that a new grant has not been received since 1997 and the loss of housing program staff in 2012. This complicates the projection of future repayments based on past trends. Whether using a 10-year, 5-year, or even a 2-year trend to forecast for future years, the forecast

shows rapid reduction in annual repayments, even though there are about \$2.8 million in active loans. As an alternative to projecting repayments based on past trends, a justifiable estimate will be provided.

Table 3: Loan Funds Repaid by DOA Reporting Period

	<b>Start Period</b>	<b>End Period</b>	<b>Income Returned</b>
1	4/1/2014	3/31/2015	\$49,752.08
2	4/1/2013	3/31/2014	\$ 84,047.09
3	4/1/2012	3/31/2013	\$107,444.54
4	4/1/2011	3/31/2012	\$30,166.07
5	4/1/2010	3/31/2011	\$ 123,153.33
6	4/1/2009	3/31/2010	\$132,349.79
7	4/1/2008	3/31/2009	\$118,286.37
8	4/1/2007	3/31/2008	\$222,040.74
9	4/1/2006	3/31/2007	\$122,696.03
10	4/1/2005	3/31/2006	\$108,305.33

Utilizing the 5-year average amount of loans repaid and a one-year projection (for 2016) based on the previous 5-years provides a reasonable range of values for estimating future repayments. On this basis, expected loan repayments would fall between \$51,036 per year (linear trend projection) and \$78,913 per year (five-year average). If 15% of loan repayments are set aside in a Working Account for loan administration, then estimated funds available to administer the program would range from \$7,655 per year to \$11,837 per year.

Table 4: Estimated Administrative Funds for 2016

	<b>Estimated Annual Loan Repayments</b>	<b>Estimated 15% Administrative Funds</b>
Low	\$51,036	\$7,655
High	\$78,913	\$11,837

### Workload Projection

A workload projection is necessary in order to assess the feasibility of various alternatives for administration of the Owner-Occupant Rehabilitation Loan program. Within this program, the City of Manitowoc will need to be prepared to address all required components, including:

1. Outreach
2. Application intake and screening
3. New loan processing
4. Project inspections and review
5. Existing loan servicing and monitoring
6. Accounting and reporting

The discussion of alternatives will consider dividing these responsibilities among qualified individuals and agencies. DOA has indicated that this is an acceptable approach, but specific DOA approval must also be secured before contracting with any outside agency for such services.

### Outreach

Various forms of outreach continue to be integrated into the operations of the Community Development Department and the City of Manitowoc as a whole. The community is already aware of these programs to a great extent just based on the number of inquiries we continue to receive for these services. A placeholder on the City's website has also been maintained. Continuing to provide outreach should be feasible within existing City operations.

Annual estimated workload for related activities: 20 hours

### Application Intake and Screening, New Loan Processing

Application intake and screening is an essential component that is currently not provided. Assuming an average loan amount of \$10,000, and the existing uncommitted RLF funds of \$72,787 less 15% for administration, the City currently has capacity to provide about five new loans. The Brown County Planning Department, which has been offering housing rehabilitation loans from its regional CDBG program to City of Manitowoc property owners during the interim, has indicated that it currently has 3 individuals already on a waiting list. The City also continues to receive inquiries about the loan program. Therefore, it would not be unreasonable to assume that there will be adequate community interest to necessitate the intake and screening of more than five loan applications, in order to find five that are indeed qualified, in the coming year. This would then translate into new loan processing for about five projects.

Annual estimated workload for related activities: 62 hours

### Project Inspections and Review

Project inspection and review is an essential component that is currently not provided. An inspector must be HQS certified, have a working knowledge of state and local building and zoning codes, and adequate knowledge and experience to evaluate bids for construction work. An average of three inspections would be typical for a new project in addition to the review of specifications and bids. Projects must also undergo a thorough environmental review as part of the inspection process.

Annual estimated workload for related activities: 60 hours

### Existing Loan Servicing and Monitoring

Servicing and monitoring of about 400 active loans is currently being provided by the City, but on a limited basis. According to DOA monitoring visit results from 2014, additional loan servicing and monitoring work must be performed by the City including annual follow-up communications with loan recipients, monitoring of homeowner insurance requirements, updating of application and loan closing forms, and the like. Processing of loan subordination requests is an ongoing responsibility as well.

Annual estimated workload for related activities: 220 hours

### Accounting and Reporting

Accounting and reporting is currently being provided by the City, but on a limited basis. The City has continued to provide the required semi-annual reports and to maintain the integrity of the RLF loan journal and related components of the City's general ledger. However, when new loans are issued, and when administrative fees are collected and utilized, an escalated level of accounting and reporting will become necessary once again.

Annual estimated workload for related activities: 55 hours

### Management and Oversight

Oversight and coordination of the loan program will be especially important during startup. Ensuring regulatory compliance, securing staff or consulting services, managing the employees or service contracts, and maintaining communication with CDBG partners represent additional responsibilities beyond loan processing and servicing.

Annual estimated workload for related activities: 80 hours

### Past Staffing

In the past, the City had much greater volume of loans being provided, and staffed this program with a full-time specialist that handled application intake and screening and part of the responsibilities relative to new loan processing, existing loan servicing and monitoring, and accounting and reporting. The housing loan specialist was supported on a part-time basis by the City Planner, who handled management and oversight and part of the responsibilities relative to new loan processing, existing loan servicing and monitoring, and accounting and reporting. The staff was further supported on a part time basis by the City Building Inspector who handled the project inspection responsibilities. Additional accounting support was provided by the City's Finance Department. This combination of staffing roles reached a total of about 2 FTEs to support the program. There were several points over the history of the program where additional contract employees were secured to assist with increased volume. This included contracted inspectors and administrative/clerical assistance, and was typically a short-term arrangement when additional grant funds were awarded. These positions typically added 0.5 to 1.0 FTE over a six month period.

### Workload Conclusions

A total of about 500 annual staff hours would be necessary to fully administer the housing rehabilitation loan program at the projected low level of activity. If all of these responsibilities could be addressed by one individual, this would equate to 0.24 full time equivalencies.

Given that staffing levels remain greatly reduced City-wide, there is virtually no capacity for existing staff to take on the additional duties needed to administer the housing rehabilitation loan program. This is of particular concern with the application intake and screening, new loan processing, and project inspection requirements of the program, and was the primary reason for the program being placed on hold. On the other hand, there is such a low volume of work anticipated, that it does not justify the addition of a full-time staff person. This is further complicated by the fact that several different disciplines, from accounting to building inspection, are required in order to properly run the program.

### **Loan Account Balance Projection**

Based on the revenue projection and workload analysis, the following five-year proforma identifies a sustainable level of new loan activity. The proforma assumes that the pace of loan repayment is flat and that the maximum amount of administrative fees are collected each year from the loan repayments. If these assumptions hold, then the maximum amount that can be loaned out to new projects is about \$55,000 per year. If the amount loaned exceeds \$55,000, then the end of year balance will decrease, and the program cannot be sustained without additional grants or revenue.



Table 5: Five-Year Program Proforma

<b>Current Uncommitted Balance:</b> \$72,787		<b>Current Active Loans:</b> \$2,779,069				
		<b>Total in New Loans per year:</b> \$55,000				
<b>Year</b>	<b>Administrative Fees</b>	<b>New Loans Given</b>	<b>Loan Repayments</b>	<b>Projected Balance</b>	<b>Active Loans</b>	
2016	\$10,918	\$55,000	\$64,974	\$71,843	\$2,769,095	
2017	\$9,746	\$55,000	\$64,974	\$72,072	\$2,759,121	
2018	\$9,746	\$55,000	\$64,974	\$72,300	\$2,749,146	
2019	\$9,746	\$55,000	\$64,974	\$72,528	\$2,739,172	
2020	\$9,746	\$55,000	\$64,974	\$72,756	\$2,729,197	

This proforma can improve if loan repayment amounts increase or if additional sources of RLF capitalization are obtained. In either of these scenarios, the potential exists to grow the loan program to a level greater than \$55,000 annually or about five loans per year. On the other hand, the proforma suffers if loan repayment amounts decline or if more than \$55,000 is loaned out in any given year. It should also be noted that the Artist Lofts project loan will be due for repayment after a deferral period of 15 years. While that does not impact this proforma, it is a source of increased revenue over the long term.

### Comparison of Alternatives

The following comparison of “Additional City Staffing” and “Contractual Services” models conclude the alternatives analysis on the basis of the revenue, workload, and loan balance projections. Although it is not a preferred scenario, “Return Funds to the State” completes the full spectrum of broad alternatives. For the two primary alternatives, capacity and skills to provide each of the necessary functional roles are comparatively assigned. Those major functional roles include:

1. Program Administrator
2. Housing Committee
3. Housing Inspector
4. Accountant

#### Additional City Staffing

This scenario adds a staff person to the City of Manitowoc Community Development Department. Given that estimated duties for the first year of operation include approximately 500 hours, this scenario assumes that such a position will either be part time or will be combined with other related duties to reach FTE status.

1. Program Administrator
  - a. Designated staff person to oversee compliance: The City’s Community Development Director would retain the role of Program Administrator, but would delegate appropriate duties to the added staff. Responsibility to comply with program requirements would fall to the Director who would oversee all functional roles of the program.
  - b. Conduct outreach and maintain current materials: The new staff would take responsibility for all outreach, but would coordinate activities with existing City staff and other departments already doing outreach.
  - c. Communication and reporting with DOA: The City’s Community Development Director would be responsible for maintaining communication with DOA. However, the new

- staff role would take a substantial part in maintaining records and providing all information needed for quarterly reporting, site monitoring, and audits.
- d. Eligibility screening, application processing: The new staff would handle these duties.
  - e. Loan closing and monitoring: The new staff would handle these with assistance from support staff in the Community Development and Finance Departments.
  - f. Subordination requests: The new staff would handle these with assistance from support staff in the Community Development Department.
2. Housing Committee
    - a. Review loan applications, make emergency awards: The City's Community Development Authority will continue to serve in this capacity.
    - b. Approve policies and budget, resolve complaints and disputes: The City's Community Development Authority will continue to serve in this capacity.
  3. Housing Inspector
    - a. Must be Housing Quality Standards (HQS) certified, with minimum five years of experience: The new staff will need to meet these requirements in order to take on all related responsibilities.
    - b. Perform inspections before, during, and after project: The new staff would be responsible for all related inspection duties and knowledge of building and zoning codes.
    - c. Provide work specifications, cost estimates, contractor bid review and environmental review: The new staff would be responsible for all related construction management duties.
  4. Accounting
    - a. Maintenance and accountability for loan journals: The new staff would work with existing support staff in the Community Development and Finance Departments to ensure that loans and payments are processed correctly.
    - b. Assistance with DOA reporting: The new staff would work with existing support staff in the Community Development and Finance Departments to ensure that quarterly reports are timely and accurate.

Advantages:

- More direct oversight of the work.
- A direct employee will likely have greater responsiveness to City needs and alignment with City vision and goals.
- High potential to combine these duties with other City needs in order to create a FTE position.
- A direct employee will have greater potential to leverage the existing resources of the City – those support roles in Community Development and Finance Departments in particular.
- As a matter of job security, a direct employee will likely have high motivation to secure additional funding sources needed to expand the program in the future.

Disadvantages:

- There is very little “institutional knowledge” remaining in City Hall regarding this program and how to get it up and running. A new staff member would need such support.
- Adequate funding for a FTE position must be derived from multiple sources.
- It would be difficult to find a part-time employee with such broad qualifications.
- The political approvals necessary to create any type of position (part-time or full-time) may not be available.

## Contractual Services

This scenario relies on a contracted service provider to take on a large share of the program requirements. This alternative requires a strong partnership between the City of Manitowoc and a consultant, as the City remains ultimately responsible for performance of the program. This scenario requires a portion of the available administrative fees be awarded to the consultant as the source of payment for services. Ideally, such a contractor or consultant would be selected on the basis of competitive proposals at a cost that does not exceed the amount of available administrative fees.

1. Program Administrator
  - a. Designated staff person to oversee compliance: The City's Community Development Director would retain the role of Program Administrator, but would delegate appropriate duties to the consultant. The delegation of responsibilities to comply with program requirements would be specified in a contract for services.
  - b. Conduct outreach and maintain current materials: Outreach activities would be shared between the City and the consultant. The City's website will continue to host appropriate information, but the consultant would be asked to evaluate all content and provide updated materials.
  - c. Communication and reporting with DOA: The City's Community Development Director would be responsible for maintaining communication with DOA. The consultant would be expected to support communication and reporting by maintaining records and providing all information needed as inputs to quarterly reporting, site monitoring, and audits.
  - d. Eligibility screening, application processing: The consultant would handle these duties.
  - e. Loan closing and monitoring: The consultant would handle these duties.
  - f. Subordination requests: The consultant would receive these requests and provide analysis and recommendations to the City for final action.
2. Housing Committee
  - a. Review loan applications, make emergency awards: The City's Community Development Authority will continue to serve in this capacity.
  - b. Approve policies and budget, resolve complaints and disputes: The City's Community Development Authority will continue to serve in this capacity.
3. Housing Inspector
  - a. Must be Housing Quality Standards (HQS) certified, with minimum five years of experience: The consultant will need to meet these requirements in order to take on all related responsibilities.
  - b. Perform inspections before, during, and after project: The consultant would be responsible for all related inspection duties and knowledge of building and zoning codes.
  - c. Provide work specifications, cost estimates, contractor bid review, and environmental review: The consultant would be responsible for all related construction management duties.
4. Accounting
  - a. Maintenance and accountability for loan journals: The consultant would be responsible to provide qualified accounting of all funds loaned and payments received under the scope of their contract.
  - b. Assistance with DOA reporting: The consultant would be responsible to provide the required quarterly reports to the City for final submittal to DOA.

Advantages:

- There are several qualified agencies and consulting firms around the state that could provide these services.
- Recruiting the help of an outside expert will help the City get “its house in order” and up to current DOA standards.
- Alleviates the need to create a City staff position.
- The projected hourly rate (see Disadvantages below) would likely motivate a consultant to find ways to be very efficient in administering the program.

Disadvantages:

- Less direct oversight of the work and increased reliance on a contractual relationship.
- Although this may be viewed as a lower cost alternative, it is not likely that the administrative fees alone will be adequate to support a consultant contract. For example, if 400 of the 500 projected labor hours become the scope of work for a consultant, and all of the administrative fees are used to pay the consultant, then the hourly rate would be about \$24 per hour.
- A consultant may or may not be motivated to find additional funding sources and expand the program in the future. It depends on the profitability of the contractual relationship.

Return Funds to the State

This alternative is only being provided as a “no action” comparison. This approach is not consistent with the City’s goals, but is a possible outcome depending on the success of any efforts to implement a solution. If the City is unable to reestablish the housing rehabilitation loan program, the remaining funds and active loans will need to be turned over to the DOA.

Advantages:

- None.

Disadvantages:

- The DOA does not have the capacity to service the City’s existing loans.
- New loans would not be offered to City of Manitowoc residents, so the program would not benefit the community.

**V. Preferred Approach**

On the basis of the analysis above, the City of Manitowoc should contract with a consultant for a period of one to two years to administer the housing rehabilitation loan program. However, the City’s longer term goal is the eventual creation of a City staff position. While there are advantages and disadvantages with each of the alternatives, creating a dedicated staff role is most consistent with the City’s overall desire to enhance the quality of life in its neighborhoods. However, more time is needed to clearly formulate the position description and assemble adequate funding sources in the City budget. The assistance of a qualified consultant will provide the needed time and the technical expertise to bring the program up to current standards. With both approaches, it is very important to the City that a high standard of care and quality is achieved in how the loan program is administered.

The City is in need of assistance in the areas of housing and zoning administration, and the addition of a related staff role in the Community Development Department represents a natural marriage of job

responsibilities. A housing and zoning specialist would take on the vast majority of housing rehabilitation loan program administration and inspection workload. This approach assumes that existing staff can continue to assist with program oversight, outreach tools, and accounting support. With experience in housing and zoning codes, this position could also respond to neighborhood compliance issues, handle certain aspects of zoning administration, and respond to code-related customer inquiries. As outlined, this position potentially relieves some key points of workload strain that already exist, and provides an opportunity to improve the City’s neighborhoods with both a code enforcement and a financial incentive tool at its disposal.

Budgetary capacity to create this position must be derived from multiple sources. Housing loan program administrative fees alone to fund this position are not currently adequate, nor are they projected to be in the future. The City must also implement other Community Development studies that recommend the recovery of available program administration fees. An increase in Community Development funding from the City’s general fund may also be necessary.

**VI. Recommendations**

1. Begin to utilize administrative funds once again. Establish a Working Account (distinct from the Grant Account) and deposit up to 15% of loan repayments into the account to fund administration of the RLF project funds.
2. Request approval from DOA for utilizing a consultant.
3. Develop a Request for Proposals and solicit proposals from qualified agencies. Select a service provider and negotiate a contract for services.
4. Work with the consultant to update forms, procedures, and reports.
5. Conduct outreach and reopen the housing rehabilitation loan program.
6. Continue discussions with the Mayor and Common Council regarding the need and funding for a Housing and Zoning Specialist in the future.
7. Evaluate the results of the consultant relationship, and extend the contract if additional time is needed to create the City staff position.
- ~~8. Create a City of Manitowoc Housing and Zoning Specialist position, hire a qualified individual, and transition the program duties from the consultant to the staff.~~

**Action Plan**

The follow table outlines the expected actions, responsible parties, and timing for implementation of the goals and recommendations of this plan.

<b>Action</b>	<b>Champion/Partners</b>	<b>Timing</b>
Seek Common Council and CDA approval of this plan	Community Development Department	<del>May-June</del> 2015
Seek DOA approval of this plan	Community Development Department	June 2015
Establish accounts and set aside administrative funds	Community Development and Finance Departments	July 2015
Develop a Request for Proposals	Community Development Department, CDA, Council	July 2015
Solicit proposals and facilitate consultant selection process	Community Development Department, CDA, Council	August-September 2015

Request DOA approval of selected consultant	Community Development Department	September 2015
Negotiate contract for consultant services	Community Development Department, CDA, Council	September 2015
Program ramp-up period (outreach, updates, etc.)	Consultant, Community Development Department	October 2015
Reopen the program – begin accepting applications	Consultant, Community Development Department	November 2015
Continue planning around future staff position	Community Development Department, Common Council	July 2015 – July 2016
Evaluate performance on consultant contract	Community Development Department, CDA	30-60-90 days, then concurrent with quarterly reports
Extend the contract if needed	Community Development Department, CDA	September 2016
<del>Hire a city staff Housing and Zoning Specialist</del>	<del>Community Development Department, Common Council</del>	<del>December 2016</del>

## VII. Conclusion

The City of Manitowoc believes that this plan for reestablishing its housing loan rehabilitation program is ambitious but necessary. It will stretch City resources even to obtain and manage a consultant contract for these services. We request the assistance of the Wisconsin Department of Administration in reviewing and refining this plan to ensure that it is feasible and fully compliant with State requirements.