

# STATE OF WISCONSIN DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor Joel Brennan, Secretary Susan Brown, Division Administrator

September 2, 2020

The Honorable Justin M. Nickels, Mayor City of Manitowoc 900 Quay Street Manitowoc, WI 54220

RE:

City of Manitowoc 2020 Community Development Block Grant CLOSE Public Facilities (CDBG-CL-PF) Project Award and Pre-Agreement Requirements

#### Dear Mayor Nickels:

Thank you for your recent Community Development Block Grant for CLOSE Public Facilities (CDBG-CL-PF) project proposal to make ADA accessibility improvements to the Rahr West Museum in the City of Manitowoc. On behalf of Governor Tony Evers and Secretary Joel Brennan, I am pleased to inform you that the Wisconsin Department of Administration (DOA) will award up to \$576,225.67 to the City of Manitowoc for this CDBG-CL-PF project.

The U.S. Department of Housing and Urban Development (HUD) provides federal funding to states through the Community Development Block Grant (CDBG) program. Wisconsin uses this federal funding to provide affordable housing, suitable living environments, and expanded economic opportunities for persons with low and moderate incomes.

To ensure that your CDBG Application meets federal HUD regulations and program goals, the DOA Division of Energy, Housing and Community Resources (DEHCR) has reviewed your Grant Application.

Information regarding CDBG requirements and a list of documents that must be submitted to finalize the CDBG Grant Agreement are provided on pages 4-6 of this letter. The City of Manitowoc has **forty-five (45) days** from the date of this letter to sign and return the Acceptance of Award on page 3 and submit the pre-agreement items listed as due under "Pre-Agreement Documents Submission" on pages 5-6.

After the Division receives these items, the City will be contacted by the assigned CDBG project representative to further discuss the terms and conditions of this CDBG-CL-PF award to help ensure the successful administration of this project under HUD guidelines. Certain compliance requirements must be met and the grant agreement must be executed <u>prior to</u> construction starting for the project. Refer to the "Pre-Construction Documents Required" section on page 7 of this letter.

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Again, congratulations and thank you for your efforts in helping our communities prosper and maintain a high quality of life for all Wisconsin residents.

Sincerely,

SUSAN BYOWN
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Susan Brown, Division Administrator
Division of Energy, Housing and Community Resources

Attachments: 7

cc: Senator Devin LeMahieu, Senate District 9, State of Wisconsin
Representative Paul Tittl, Assembly District 25, State of Wisconsin
Steve Corbeille, Finance Director, City of Manitowoc
Deborah Neuser, City Clerk, City of Manitowoc
Adam Tegen, Development Director, City of Manitowoc
David Pawlisch, Director, Bureau of Community Development
Kristine Haskin, Budget and Policy Analyst – Advanced, Division of Energy, Housing and Community
Resources

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City of Manitowoc [CL-PF 20-10] CDBG-CL-PF Award Amount: \$576,225.67

### **ACCEPTANCE OF THE AWARD**

This award letter represents the Department of Administration – Division of Energy, Housing and Community Resources' participation in the project. It can be accepted by signing below and returning this to the Division via email to <a href="mailto:ben.Lehner@wisconsin.gov">Ben.Lehner@wisconsin.gov</a>.

AUTHORITY TO SIGN DOCUMENT: The persons signing this Acceptance on behalf of the City of Manitowoc certify and attest that the City's respective Resolutions, and/or other related documents, give full and complete authority to bind the City on whose behalf they are executing this document. The persons signing below also acknowledge that the specific provisions of this award letter are not binding upon the Division or City of Manitowoc and that the Division may withdraw this award at any point for any reason.

#### **ACKNOWLEDGEMENT**

City of Manitowoc	
Signature of Chief Elected Official	10 - 7- 2020  Date Signed
Justin M. Nickels	a 1
Printed Name of Chief Elected Official	Title of Chief Elected Official
Signature of Clerk	10-7-20 Date Signed
Deborah Neuser  Printed Name of Clerk	City Clerk

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City of Manitowoc [CL-PF 20-10] CDBG-CL-PF Award Amount: \$576,225.67

### CDBG REQUIREMENTS AND PRE-AGREEMENT DOCUMENTS SUBMISSION

Specific procedures must be followed prior to undertaking CDBG activities. The Grantee must comply with applicable federal and state regulations and other grant requirements. Failure to comply with the regulations governing the CDBG program may result in this award being rescinded.

The grant award of up to \$576,225.67 represents approximately 71.1% of the proposed project costs. Total costs for this project are estimated to be \$810,000. The City of Manitowoc must contribute other funds above the grant award amount in order to successfully complete the project.

#### PROJECT ADMINISTRATOR TRAINING

All CDBG project administrators are required to participate in implementation training sessions, as scheduled by the Division. The 2020 Grantees must participate in implementation training in the fall of 2020 when scheduled. Contact your assigned DEHCR Program Representative to discuss available training options.

Additional training and registration materials will be sent to Grantees in separate correspondence via email. Training information and updates are also posted on the Bureau of Community Development website at: https://doa.wi.gov/Pages/LocalGovtsGrants/TrainingAndTechnicalAssistance.aspx

#### **PROCUREMENT PROCESS**

Regulations require each CDBG Grantee follow its local procurement policy. The City of Manitowoc must use procurement procedures that comply with federal, state, and local regulations for purchases and contracts funded in whole or in part with CDBG dollars. The City's procurement policy must be submitted to and reviewed by the Division prior to the City receiving any funding. The Division cannot release CDBG funds for contracted materials and services that have been improperly procured.

Refer to Chapter 3 of the CDBG Implementation Handbook, available on the Bureau of Community Development's website at <a href="https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGImplementationHandbook.aspx">https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGImplementationHandbook.aspx</a>, for procurement and contracting guidance. The City of Manitowoc must adhere to competitive sealed bid requirements for public works construction contracts of more than \$25,000 under Wisconsin Statutes (§59.03; §60.47; §61.54-57; §62.15; and §66.0901). Procurement through competitive proposal is most appropriate for engineering, grant administration, and related professional services. Grantees may choose to use simplified acquisition procedures for other services and goods that cost \$50,000 or less, per State CDBG policy. Records verifying that the appropriate procurement procedures were followed must be maintained in the City of Manitowoc's CDBG project files.

#### **ENVIRONMENTAL REQUIREMENTS**

An Environmental Review Record and the affiliated actions must be completed for the project and an Environmental Certification letter must be issued by the Division's Environmental Compliance Officer prior to

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construction activities beginning. Starting construction activities prior to meeting environmental compliance certification requirements will disqualify the project from CDBG funding eligiblity. The environmental specifications for CDBG projects are provided in Chapter 4 of the CDBG Implementation Handbook.

#### **SEMI-ANNUAL & ANNUAL REPORTING**

Semi-annual and annual reporting for the CDBG project is required. The City of Manitowoc must submit the reports in accordance with Chapter 9 of the current CDBG Implementation Handbook and the CDBG Grant Agreement. Grantees that accept a CDBG award must submit the applicable reports for the first reporting period that occurs after receipt of the Grant Award, regardless of whether the CDBG Grant Agreement has or has not been fully executed:

- A Semi-Annual Labor Standards Enforcement Report for the reporting period of April 1, 2020 –
   September 30, 2020 submitted to DEHCR no later than September 25, 2020;
- A Minority Business Enterprise/Woman Business Enterprise (MBE/WBE) Report for the reporting period of April 1, 2020 – September 30, 2020 submitted to DEHCR no later than September 25, 2020;
- A Semi-Annual Report Certification and Summary Narrative for the period of April 1, 2020 –
   September 30, 2020 submitted to DEHCR no later than October 15, 2020; and
- A Semi-Annual Section 3 Report for the period of April 1, 2020 September 30, 2020 submitted to DEHCR no later than October 15, 2020.

The Grantee shall report all activities from the Award Date (i.e., the date of this letter) through the end of the reporting period ending September 30, 2020.

#### PRE-AGREEMENT DOCUMENTS SUBMISSION

All information provided in the CDBG Application is subject to further verification and review by the Division upon request. The Grant Agreement will be finalized, contingent upon the Division receiving and approving the following pre-agreement documentation:

- 1. A copy of the City of Manitowoc's procurement policy. Attach a list of executed contracts for CDBG project-related services and documentation on how the services were procured.
- 2. A completed Financial Management Contact Person form (attached with this letter).
- 3. A completed Depository Certification form (attached with this letter).
- 4. A completed Signature Certification form (attached with this letter).
- 5. A completed W-9 [Request for Taxpayer Identification Number (TIN) Certification] form (attached with this letter).
- 6. A completed DOA-6460 New Supplier form (attached with this letter).

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City of Manitowoc [CL-PF 20-10] CDBG-CL-PF Award Amount: \$576,225.67

- 7. A completed DOA-6456 Authorization for Electronic Deposit form (attached with this letter) and accompanying bank documentation. If the City would like to receive paper checks instead of having CDBG funds deposited electronically, contact your assigned DEHCR Program Representative to obtain the appropriate form.
- 8. An updated project budget, reflecting the CDBG award and any changes to funding or projected costs, if applicable, using the budget form provided (attached with this letter).
- An itemized, bullet-pointed list of all construction activities and project deliverables to be included in the Scope of Work in the CDBG Grant Agreement, based on the description of the project in the City of Manitowoc's CDBG-CL-PF Application.
- 10. An updated project timeline with the projected construction bidding date(s) and construction start and end dates. Construction must begin no later than July 1, 2021 and end no later than October 31, 2022.

  Grantees must contact their assigned DEHCR Project Representative to request any exceptions.

Please respond with the information and documentation requested in this "Pre-Agreement Documents Submission" section within forty-five (45) days from the date of this letter. Requested items should be submitted to the Division via email to Ben.Lehner@wisconsin.gov.

#### PRE-CONSTRUCTION DOCUMENTS REQUIRED

The following documents are required prior to the start of any construction and the Division's disbursement of CDBG funds for the CDBG project:

- A fully executed CDBG Grant Agreement between the Division and City of Manitowoc (signed by all parties).
- A completed Environmental Review Record (including an Environmental Assessment, if required) and issuance of the Environmental Certification letter from the Division's Environmental Compliance Officer.
- Documentation of compliance with applicable federal labor standards and Federal Davis-Bacon Wage
  Rates for any construction funded, in whole or in part, with CDBG funds. Documents required are
  listed in the Time Table in the CDBG Grant Agreement and the CDBG Implementation Handbook. An
  overview of the Davis-Bacon federal labor standards and requirements is provided in Chapter 7 of the
  CDBG Implementation Handbook.

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City of Manitowoc [CL-PF 20-10] CDBG-CL-PF Award Amount: \$576,225.67

Copies of the competitive procurement solicitation (e.g., the Request for Proposals [RFP]) and the
advertisement for the RFP), if applicable, and the executed contract between the City of Manitowoc
and the contracted grant administrator, if the City has contracted with another party for grant
administration services. Only submission of the executed contract and documentation verifying the
City followed the local procurement policy in selecting and contracting with the grant administration
firm are required if the City is not using CDBG funds to directly pay for this activity.

Please contact your assigned CDBG project representative Ben Lehner, Grants Specialist – Advanced, at (608) 264-6110 or Ben.Lehner@wisconsin.gov if you have any questions or concerns.

We congratulate the City of Manitowoc on this 2020 grant award and we look forward to working with you to ensure successful completion of this CDBG-CL-PF project.

### **Division of Energy, Housing and Community Resources**

**Financial Management Contact Person Form** 

UNIT OF GENERAL LOCAL GOVERNMENT'S	(UGLG'S) NAME:	City of Manitowoc
DEHCR GRANT	AGREEMENT #:	CDBG CL-PF 20-09

### FINANCIAL MANAGEMENT CONTACT PERSON

FINANCIAL MANAGEMENT CONTACT PERSON:  (Person that will complete the CDBG Request for Disbursement form)			_	Sydney Swa	n
(Person that will complete	the CDBG Re	quest for Disbursement fo	m)		
CONTACT PERSON	'S TITLE:	Economic Develop	ment Planne	<u> </u>	
FIRM (if applicable):		Bay-Lake Regional	Planning Co	ommission	
STREET ADDRESS:		425 South Adams	Street, Suite	201	<u> </u>
CITY: Green Bay		STAT	re: WI	ZIP CODE: _	54301
PHONE NUMBER:	920-448-2	820 ext. 108			
FAX NUMBER:	920-448-2	823			····
EMAIL ADDRESS:	sswan@b	aylakerpc.org			
Submit this form via Representative in th					
Email:	Your assig	ned DEHCR CDBG P	roject Repres	sentative or <u>DOACI</u>	DBG@wisconsin.gov
Mail:	Wisconsin Division of Bureau of P.O. Box 7	r Assigned DEHCR F Department of Admin Energy, Housing and Community Developm 970 VI 53707-7970	istration Community F	Resources	lere]

Unit of General Local Government's		City of Manitowoc	
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Manitowoc .		Village/Town/County)	
(UGLG /Community Name)			
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Justin M. Nickels  yped Name of the Chief Elected Official)	Original Form (Check One)	Amended Form	
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	of Energy, Housing and ( f Community Developme		
P.O. Box 7	7970		
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### **Division of Energy, Housing and Community Resources**

**Signature Certification Form** 

UNIT OF GENERAL LOCAL GOVERNMENT'S (UGLG'S) NAME: City of Manitowoc
DEHCR GRANT AGREEMENT #: CDBG CL-PF 20-09

### SIGNATURE CERTIFICATION FORM

The Authorized Signatories cannot include the Chief Elected Official (CEO).

This signature replaces the previously authorized signature of:    Community Development Director Director Director Date	Signature of Authorized Person	Comptrollêc Deputy Treasurer Title	9/24/20 Date
Community Development Director Title  Typed Name of Authorized Person:  Adam Tegen  This signature replaces the previously authorized signature of:  N/A  Sydney Swan  Typed Name of Authorized Person  Title  Date  Economic Development Planner  O9/23/20  Date  Typed Name of Authorized Person  Typed Name of Authorized Person:  Sydney Swan  This signature replaces the previously authorized signature of:  N/A  N/A  N/A  N/A  N/A  N/A  N/A  N/	Typed Name of Authorized Person:	Kim Lynch	<del></del>
Signature of Authorized Person  Title  Typed Name of Authorized Person:  Adam Tegen  This signature replaces the previously authorized signature of:  N/A  Sudney Swan  Economic Development Planner Planner  Typed Name of Authorized Person:  Typed Name of Authorized Person:  Sydney Swan  This signature replaces the previously authorized signature of:  N/A  *********************************	This signature replaces the previously authori	ized signature of:	N/A
This signature replaces the previously authorized signature of:    Sydney Swan   Economic Development Planner   09/23/20	Signature of Authorized Person	Director	nent 9-24-20 Date
This signature replaces the previously authorized signature of:    Sudding Swan   Economic Development Planner   09/23/20     Signature of Authorized Person   Title   Date		Adam Tegen	
Sydney Swan  Signature of Authorized Person  Title  Typed Name of Authorized Person:  Sydney Swan  This signature replaces the previously authorized signature of:  N/A  *********************************			N/A
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I HEREBY CERTIFY THAT THE ABOVE SIGNATORIES ARE AUTHORIZED TO SIGN THE REQUEST FOR PAYMENT OF COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS.  Mayor 16-7-2020		Planner Title	09/23/20
Typed Name of Chief Elected Official: Justin M. Nickels	Typed Name of Authorized Person:	Planner Title Sydney Swan	Date

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### Identification Number and Certification Request for Taxpayer

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Form 1058-IVT (Interest earned or paid)

State of Wisconsin Wisconsin Department of Administration Division of Executive Budget & Finance DOA-6460 (R09/2018)



### **New Supplier Form**

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Phone: 920-686-6960			,	3	
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October 2, 2020

To Whom It May Concern:

The purpose of this letter is to confirm the banking information for City of Manitowoc Wisconsin at Bank First. Please process all ACH debit/credit transactions to the account information listed below:

Bank Name: Bank First, N.A.

Bank Address: 402 N 8th Street, Manitowoc, WI 54221-0010

**Routing Number: 075901 134** 

Account Number: 44230439

Account Type: Checking

If you have any questions, please do not hesitate to contact me directly at (920) 652-3117 or ddomino@bankfirstwi.bank.

Regards,

**Derek Domino** 

Treasury Management Assistant

920-652-3117 | ddomino@bankfirstwi.bank

State of Wisconsin Wisconsin Department of Administration Division of Executive Budget & Finance DOA-6456 (R07/2019)



### **Authorization for Direct Deposit**

Section 1: Identifying Information	
Tax Identification Number: 3 9 6	0 0 5 5 1 1 .or. SSN
2014년 1914년 1일	we are <u>required</u> to obtain your Tax Identification Number (TIN) to y law. <u>Forms without a TIN will not be accepted</u> .
Legal Name City of Manitowoc	
Doing Business As Name: N/A	
Address: 900 Quay Street	. Markeys Co. L. Will Tip F4000
	ty: Manitowoc State: WI ZIP: 54220
Section 2: Additional Identifying Information Supplier ID: 9111	DUNS# 025970799
Recent payment number/amount received from the State: October	5, 2020 \$401,947.80
Section 3: Current Financial Information	Section 4: Prior Financial Information
Bank Verification Must be Attached	Must be Provided to Change/Update Account
Bank Name Bank First, N.A.	Bank Name
Type Checking / Savings	Type Checking Savings
Account Number 44230439	Account Number
Account number supplied must match attached bank verification	Account number supplied must match previous account number on file
Routing Number 0 7 5 9 0 1 1 3 4	Routing Number
Routing number supplied must match attached bank verification	Routing number supplied must match previous account number on file
New/Additional Email Address for Remittance Instructions:	Previous Email Address for Remittance Instructions:
rscherer@bankfirstwi.bank	
Section 5: International ACH Transaction Information	在1990年的西方斯特拉拉斯斯特斯斯特斯特斯斯特斯斯特斯特斯特斯特斯特斯特斯特斯特斯特斯特斯特斯
Section 5: International ACH Transaction Information Will the entire amount of this electronic payment ultimately be	deposited into a financial institution outside of the Yes
	deposited into a financial institution outside of the Yes No 7
Will the entire amount of this electronic payment ultimately be	
Will the entire amount of this electronic payment ultimately be United States, and therefore fall under the regulation of IAT?	
Will the entire amount of this electronic payment ultimately be United States, and therefore fall under the regulation of IAT?  Section 6: Municipalities Only	No /
Will the entire amount of this electronic payment ultimately be United States, and therefore fall under the regulation of IAT?  Section 6: Municipalities Only  Local Gov Investment Pool 836251	No /
Will the entire amount of this electronic payment ultimately be United States, and therefore fall under the regulation of IAT?  Section 6: Municipalities Only  Local Gov Investment Pool 836251	No /
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Will the entire amount of this electronic payment ultimately be United States, and therefore fall under the regulation of IAT?  Section 6: Municipalities Only Local Gov Investment Pool 836251  Section 7: Comments  Section 8: Read the Agreement, Sign & Date	Sub Account Number Acct #01
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October 2, 2020

### To Whom It May Concern:

The purpose of this letter is to confirm the banking information for City of Manitowoc Wisconsin at Bank First. Please process all ACH debit/credit transactions to the account information listed below:

Bank Name: Bank First, N.A.

Bank Address: 402 N 8th Street, Manitowoc, WI 54221-0010

**Routing Number: 075901134** 

Account Number: 44230439

Account Type: Checking

If you have any questions, please do not hesitate to contact me directly at (920) 652-3117 or ddomino@bankfirstwi.bank.

Regards,

**Derek Domino** 

Treasury Management Assistant

920-652-3117 | ddomino@bankfirstwi.bank

### CDBG PROJECT BUDGET

GRANTEE: City of Manitowoc GRANT AGREEMENT #: CDBG CL-PF 20-09 DATE: 10 / 6 / 2020

Activity	FUNDS SE dollars)	MA	DBG CLOSE TCH FUNDS (if applicable)	120-200	HER MATCH	TOTAL ACTIVITY COSTS
Acquisition - Land (incl. Easements)	\$ -	\$		\$	-	\$ 100
Acquisition - Building(s)	\$ 7-	\$	-	\$		\$ -
Building Improvements	\$ -	\$	561,225.67	\$	238,774.33	\$ 800,000.00
Center/Facility Construction	\$	\$	-	\$	-	\$ 1 <del>5</del> .
Clearance - Site	\$ -	\$	-	\$	-	\$ -
Curb and Gutter	\$ -	\$	-	\$	_	\$ -
Electrical System Improvements	\$ -	\$	-	\$	-	\$ -
Environmental Remediation	\$ -	\$	-	\$	-	\$ 
Equipment	\$ -	\$	=	\$	-	\$ -
Fixtures	\$ -	\$	=	\$	-	\$
Fire Station	\$ -	\$	-	\$	-	\$ (*)
Relocation	\$ -	\$	-	\$	-	\$
Sanitary Sewer	\$ -	\$	-	\$	-	\$
Storm Sewer	\$ -	\$	-	\$	-	\$ -
Street(s)/Sidewalk(s)	\$ -	\$	-	\$	-	\$ -
Wastewater Treatment Facility	\$ -	\$	-	\$	-	\$
Water	\$ -	\$	-	\$	-	\$ -
Furnishings (Non-CDBG Match ONL)				\$	-	\$ -
Engineering (Match ONLY)		\$	-	\$	66,000.00	\$ 66,000.00
Administration	\$ -	\$	15,000.00	\$	-	\$ 15,000.00
Sub-Totals:	\$ 10 mg 2	\$	576,225.67	\$	304,774.33	\$ 881,000.00

Continued on the next page.

### **CDBG PROJECT BUDGET**

GRANTEE: City of Ma	initowoc (	3RAI	NT AGREEM	ENT #: <u>CD</u>	BG CL-PF 20-09 DATE: 10 / 6 / 2020
Summarize the Match Fun	iding sources a	nd a	mounts for t	his CDBG	project:
Source: City Bonded Fur	nds Amount:	\$	575000.00	Status:	
Source: Rahr West Found	ation Amount:	\$	66000.00	Status:	X   Pending   Committed   Other     Applied   Secured/Awarded
Source:	Amount:	\$		Status:	
					Applied Secured/Awarded
Source:	Amount:	\$		Status:	Pending Committed Other
•					Applied Secured/Awarded
Source:	Amount:	\$		Status:	Pending Committed Other
					Applied Secured/Awarded
(Insert Text Here)				-	nan a one-sentence narrative per source).
Documentation to verify to previously provided in the	_				must be submitted to DEHCR, if not
Does the UGLG anticipate u		is to	pay for Grant	Administra	tion or any other professional services
fede	ral CDBG requii	reme	ents set forth	in Chapter	ured in accordance with state and r 3 of the CDBG Implementation ment policy requirements.
. لسب	, the services m G's local procu			sing a pro	cess that is in compliance with the

## CDBG PROJECT SERVICE AREA DEMOGRAPHIC PROFILE FORM

**City of Manitowoc** 

Grant Agreement #:

**CDBG-PF 20-09** 

RACE/ETHNICITY CATEGORY*	# BENEFICIARIES IN CATEGORY
White	2825
White + HISPANIC	173
Black/African American	53
Black/African American + HISPANIC	/ O
Asian	199
Asian + HISPANIC	
American Indian/ Alaskan Native	20 The second se
American Indian/ Alaskan Native + HISPANIC	
Native Hawaiian/Pacific Islander	0
Native Hawaiian/Pacific Islander + HISPANIC	the later of the group of the same
American Indian/ Alaskan Native & White	0
American Indian/ Alaskan Native & White + HISPANIC	0
Asian & White	0
Asian &White + HISPANIC	0.4.
Black/African American& White	0
Black/African American White + HISPANIC	
American Indian/ Alaskan Native & Black/African American	0
American Indian/ Alaskan Native & Black/African American + HISPANIC	0
Other Multi- Racial	57
Other Multi- Racial + HISPANIC	0
Other	61
TOTAL # OF BENEFICIARIES**	3388
TOTAL # OF BENEFICIARIES WHO ARE LMI (if known)***	1728

<sup>\*</sup>These race/ethnicity categories are required for reporting to HUD. If the race/ethnicity information is unknown for the beneficiaries, the most recent U.S. Census American Community Survey (ACS) 5-Year Estimates data (at https://data.census.gov) may be used to estimate the # of persons among beneficiaries in each category. [Methodology: Determine percentages of persons in your community in each category using the ACS data. Then apply the percentages to the beneficiary group to calculate the number of persons among beneficiaries in each category.]

<sup>\*\*</sup>The Total # of Beneficiaries must match the total # of beneficiaries listed in the CDBG Application with no duplication of persons.

<sup>\*\*\*</sup>The # of LMI beneficiaries may be based on HUD LMI Summary Data or income survey data; or for projects exclusively serving Limited Clientele, the calculation may be 51% of the total # of beneficiaries, unless client income information or the nature of the facility is such that a higher LMI percentage for the Limited Clientele group is verified or presumed (e.g., HUD Section 8 housing and homeless shelters may be presumed to be 100% LMI). The # of LMI beneficiaries is not required for Slum & Blight projects.