



U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Region IV, Miami Field Office
Brickell Plaza Federal Building
909 SE First Avenue, Room 500
Miami, FL 33131-3028

Ms. Amy Patterson
County Manager
Collier County
3299 Tamiami Trail East, Suite 202
Naples, FL 34112

Subject: Annual Community Assessment
Consolidated Annual Performance and Evaluation Report (CAPER)
Program Year (PY) 2020
Programs: CDBG, CDBG CV- 1 and CV- 3
HOME, ESG, ESG CV-1 and CV-2
NSP 1 and 3 Programs

Dear Ms. Patterson,

The Housing and Community Development Act of 1974, as amended and the National Affordable Housing Act of 1990, require that a determination be made annually by HUD that the grant recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received.

In accordance with the Consolidated Planning Regulations of January 5, 1995, this Office makes a comprehensive performance review of your overall progress annually, as required by 24 CFR 91.525. The review consists of analyzing your consolidated planning process; reviewing management of funds; determining the progress made in carrying out your Consolidated Plan policies and programs; determining the compliance of funded activities with statutory and regulatory requirements; determining the accuracy of required performance reports; and evaluating your accomplishments in meeting key departmental objectives.

We congratulate you on your accomplishments during this past year in the achievement of departmental objectives.

SUMMARY OF PERFORMANCE

Community Development Block Grant (CDBG)

The CDBG program is authorized under title I of Pub. L. 93–383, Aug. 22, 1974, 88 Stat. 633. The primary objective of the community development program is the expansion of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. The Federal

HUD's mission is to create strong, sustainable, inclusive communities and quality, affordable homes for all.

assistance should be for the support of community development activities which are directed toward compliance with the following specific objectives: benefit to low- and moderate-income families, aid in the elimination of slums and blight and the prevention of blighting influences and the deterioration of property and neighborhood and community facilities of importance to the welfare of the community, and the need of meeting other community development urgency needs, principally persons of low and moderate income.

Consistent with the primary objective, not less than 70 percent of the aggregate of the Federal assistance provided to units of general local government shall be used for the support of activities that benefit persons of low and moderate income. The county was awarded in FY 2020 \$ 2,736,494.00 grant funds and is commended on its performance in expending 100.00% on activities benefiting low or moderate-income persons. This performance meets departmental standards.

The Financial summary indicated \$343,761.72 in net expenditures for planning and administrative costs, or 12.36% of the grant funds plus program income received during the FY 2020 program year. The Financial Summary also disclosed \$394,042.61 in net expenditures for public services, or 13.09 % of the grant.

Please note that due to COVID -19 the public service cap was suspended for activities to prevent, prepare for, and respond to Coronavirus. Our review of the activities indicates that they appear to be eligible as provided for at 24 CFR Part 570.201-6 and meet one of the three National Objectives established at 24 CFR part 570.208. (PR 26)

We are pleased with the county's housing assistance performance, in particular its affordable housing activities that provided funding for The HOME program assisted for 10 households with TBRA rental assistance in the program year. There are currently over 80 households being served through TBRA, to benefit low-income households.

Based on government restrictions, closures, shelter-in-place orders, and social distancing guidance related to coronavirus, HUD determined that all entitlement grantees had factors beyond their reasonable control that, to HUD's satisfaction, impact the carrying out of CDBG-assisted activities in a timely manner. As a result, HUD suspended for fiscal year 2020 all corrective actions, sanctions, and informal consultations for timeliness effective January 21, 2020, through September 30, 2021. Thereafter, HUD continued to run expenditure reports and will continue to notify grantees of deficiencies. You may refer to Federal Register 6218-N-01: Notice - IV.B.1 and requirements set forth in 24 CFR part 570.902 (entitlements).

On October 21, 2021, HUD issued a memorandum explaining a temporary change in the process for the application of corrective actions for untimely expenditure in the Community Development Block Grant (CDBG) Entitlement Program. This change to the CDBG Timeliness policies and procedures will remain in effect for a two-year period beginning October 1, 2021, the start of the 2022 fiscal year, and conclude on September 30, 2023, the end of the 2023 fiscal year. HUD will continue to monitor a grantee's line of credit adjusted ratio (including program income) in the application of this policy.

As a reminder, according to the National Defense Authorization Act of 1991 (P.L.101-510), CDBG grantees have a total of eight years to obligate and expend CDBG funds, counting the three-year obligation period and the additional five years for expenditure. For example, CDBG funds appropriated by Congress in FY 2015 must be obligated (put under funding contract to the grantee) by September 28, 2017 (three years). They must be disbursed by the grantee by September 28, 2022 (FY 2017 + 5 years). If the FY 2015 grant funds are not drawn down from the Line of Credit Control System (LOCCS) by the end of FY 2022, funds will be recaptured by HUD and returned to the U.S. Treasury. Also, be aware that if a grantee returns funds to an expired grant, the funds are returned to the Treasury and are no longer available in the grantee's LOCC's. This means, grantees unspent funds will be permanently lost. Therefore, grantees who need to return funds to an expired grant should contact our Miami Field Office for instructions.

Community Development Block Grant - (CDBG) - CV 1 and 3

The Coronavirus Aid, Relief and Economic Security (CARES) Act was signed under Public Law 116-136- (CARES Act) on March 27, 2020. The CDBG coronavirus response (CDBG-CV) funds were made available to communities to prevent, prepare for, and respond to coronavirus crisis. CDBG-CV- grants are subject to the requirement that 70 percent of funds are for activities that benefit LMI persons. The requirements at 42 U.S.C. 5301I, 42 U.S.C. 5304(b)(3)(A), 24 CFR 570.200(a)(3), 24 CFR 570.420(d)(2)- (3) (insular areas), and 24 CFR 570.484 (states) shall remain in place to the extent that they require the grantee to ensure that 70 percent of its CDBG-CV grant be expended for activities that benefit LMI persons. As an alternative requirement, however, HUD is requiring that grantees must demonstrate compliance with the overall benefit requirement separately for a grantee's total CDBG-CV grant allocation and not in combination with annual formula CDBG funding or commitments under the Section 108 Loan Guarantee program.

Please be advised that the period of performance for the funding assistance specified in the Funding Approval/Agreement ("Funding Assistance") shall be six years and shall end six years later. The Grantee shall not incur any obligations to be paid with the Funding Assistance after this period of performance. HUD is imposing this period of performance to ensure the use of CDBG-CV funds to prevent, prepare for, and respond to coronavirus. The CDBG regulations at 24 CFR 570.200(k) and 24 CFR 570.480(h) permit HUD to establish a period for expenditure and performance in a grant agreement that is shorter than the normal 8-year period. HUD is exercising its authority to establish a 6-year period of performance and expenditure deadline in the CDBG- CV grant agreement. Grant funds are not available for expenditure after the period of performance. In addition, to further ensure the expedited use of the funds, HUD is imposing an alternative requirement that each grantee must expend at least 80 percent of all CDBG- CV funds (including CDBG-CV funds from additional allocations that are obligated by HUD through amendments to the grant agreement) no later than the end of the third year of the period of performance established by the CDBG- CV grant agreement. If this three-year requirement is not met, and evidence meeting the criteria for extension described in section III.B.7. (c) below is not provided, an amount equivalent to the difference between the total amount expended at the end of the third year and 80 percent of all CDBG-CV funds will be recaptured from the CDBG-CV grant.

The county was awarded the cumulative amount of \$ 4,232,728.00 in CDBG-CV-1 and CV-3 grant funds and has expended \$ 285,048.8 of its allocated grant funds.

The Reporting CDBG-CV Accomplishments in the CAPER Quick Guide provides guidance for grantees to report progress using Community Development Block Grant (CDBG) and CDBG CARES Act (CDBG-CV) funds to respond to COVID-19 within the Consolidated Annual Performance and Evaluation Report (CAPER).

<https://files.hudexchange.info/resources/documents/Reporting-CDBG-CV-Accomplishments-in-the-CAPER-Quick-Guide.pdf>

The Federal Register Notices for each program are posted on the HUD website as listed below:

- CDBG-CV Notice: https://www.hud.gov/sites/dfiles/CPD/documents/CDBG-CV_Notice_Federal_Register_Publication_2002-08.pdf

HOME

The HOME Investment Partnerships program is authorized under Title 42--THE PUBLIC HEALTH AND WELFARE CHAPTER 130--NATIONAL AFFORDABLE HOUSING SUBCHAPTER II--INVESTMENT IN AFFORDABLE HOUSING Sec. 212. Eligible uses of investment are made available under this part and may be used by participating jurisdictions to provide incentives to develop and support affordable rental housing and homeownership affordability through the acquisition, new construction, reconstruction, or moderate or substantial rehabilitation of affordable housing, including real property acquisition, site improvement, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations, to provide for the payment of reasonable administrative and planning costs, to provide for the payment of operating expenses of community housing development organizations, and to provide tenant-based rental assistance. For the purpose of this part, the term "affordable housing" includes permanent housing for disabled homeless persons, transitional housing, and single room occupancy housing.

HOME Final Rule -

HUD published a Final Rule in the Federal Register on July 24, 2013, to amend the HOME Program regulations. These amendments to the HOME regulations represent the most significant changes to the HOME Program in 17 years. Generally, the provisions of the HOME Final Rule are effective on August 23, 2013. Thereafter, HUD published an Interim Final Rule on December 2, 2016, implementing a grant-specific method of determining compliance with the statutory 24-month deadline for committing HOME funds. The interim rule is effective on January 3, 2017.

HOME Commitment deadline -

While the HOME commitment requirement has been suspended through deadlines occurring in 2023, including HOME program income and any of the other local account fund types (i.e., HP and IU), PJs must commit all prior years' local account funds to activities in IDIS before they commit Treasury funds (e.g., EN) to activities in IDIS. As an example, in order to fund an activity with 2020 EN funds in IDIS, a PJ must first commit all 2019 and earlier (i.e., 2018, 2017, etc.) local account funds by using them to fund activities in IDIS.

A new HOME Commitment and Disbursement Report became available in January 2020, HUD began posting the new [Grant Specific Commitment and Disbursement Summary Report](#). The report is generated monthly by HUD and reflects each HOME PJs commitment and expenditures for open 2015 and later grants. Because the 24-month HOME commitment requirement is currently suspended and the 5-year expenditure requirement was eliminated by regulation, this report replaces the Grant Specific HOME Deadline Compliance Status Report. However, even without timeliness deadlines for 2015 and later grants, HUD expects each PJ to monitor its commitment and expenditure rates to ensure the timely use of program funds. This new report provides an easy way for PJs and CPD Field Offices to track commitment and expenditure progress on a grant-by-grant basis.

HOME Expiring Funds –

The due date for FY 2015 “Expired” HOME funds appropriated in federal fiscal year (FY) 2015 has been extended one year in the Consolidated and Further Continuing Appropriations Act, 2015 (P.L. 113-235). The report will be available on October 1, 2022 and will identify the funds subject to expire on September 30, 2023. In an effort to assist PJs in identifying FY 2015 and older grant balances, HUD will post a report periodically identifying each PJ that has a grant balance for FY 2015 and earlier.

The county was awarded \$ 730,958.00 in HOME FY 2020 grant funds. Our review determined that the county achieved its objective of providing affordable housing.

Total disbursements during the year that included prior year funds was \$85,108.58, including \$ 50,598.09 for administrative costs. Our evaluation of these accomplishments disclosed no concerns with respect to eligibility, income targeting, affordability, or match requirements.

HOME Deadline Compliance Status Report- Grant Specific by FY –

The grant-specific version of the HOME Deadline Compliance Status Report (DCSR) is generated by HUD at the end of each month and reflects each HOME PJ's expenditure requirements and deadlines.

On December 2, 2016, HUD published an interim final rule making changes with respect to HOME program commitment, community housing development organization (CHDO) reservation, and expenditure requirements. The rule became effective on January 3, 2017.

Beginning with FY 2015 HOME allocations, HUD ceased using the cumulative method for measuring compliance with the requirement that Participating Jurisdictions (PJs) commit HOME funds within 24 months of obligation. Further, the *Consolidated Appropriations Act of 2019* included a provision suspending the 24-month commitment requirement for CHDO set-aside funds, as well as continuing the suspension of the 24-month commitment requirement for regular HOME funds. Both deadline requirements are suspended through December 31, 2021.

As of a PJ's deadline, all funds from the specific HOME allocation must be fully expended by no later than the deadline based on the expiration date of the grant. Any HOME funds not disbursed by the expenditure deadline will be recaptured by U.S. Treasury.

HOME Four-Year Completion Requirement for HOME-Assisted Projects

The HOME Final Rule requires that all HOME projects to which funds were committed on or after August 23, 2013, meet the definition of "project completion" at §92.2 within 4 years. This includes construction completion, title transfer, final funding drawdown, and completion in IDIS. Absent an extension, PJs must repay the HOME funds invested in projects not completed within 4 years. For compliance purposes, HUD will determine the actual start of the 4-year completion deadline based upon the written agreement date.

PJs will not be able to make any changes to activities that are blocked due to not being completed within 4 years. HUD will determine the actual applicability of the requirements based upon the written agreement date. PJs can use the HOME activities report to view and track activities subject to the 4-year project completion deadline in IDIS, including: activities that are open, activities in final draw, or completed activities. The Completion Deadline column is 4 years after the Initial Funding Date of the activity in IDIS and is used as an approximation of the 4-year project completion deadline. For compliance purposes. The report may be obtained at the following link:

[Post 2011 HOME Activities Reports - HUD Exchange](#)

Matching Contribution Requirement - 24 CFR Part 92.218

Each participating jurisdiction must make contributions to housing that qualifies as affordable housing under the HOME program. The contribution must total not less than 25 percent of the funds drawn from the jurisdiction's HOME Investment Trust Fund Treasury account in that fiscal year, except for administration and planning cost, pursuant to 24 CFR 92.207. This requirement may also be subject to change due to a match reduction for HUD CPD COVID-19 Waivers, fiscal distress or presidential declared disaster designation by HUD HQ's. The county's FY 2020 annual match requirement contribution was 0%.

Emergency Solutions Grants Program (ESG)

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Emergency Solutions Grants (ESG) Program Components Quick Reference Emergency Solutions Grants (ESG) funds can be used to provide a wide range of services and supports under the five program components: Street Outreach, Emergency Shelter, Rapid Rehousing, Homelessness Prevention, and HMIS. Each component is described in the tables below, accompanied by a list of corresponding ESG activities and eligible costs. Note: Administration is a not a component, it is considered an activity. You may refer to the program regulations at 24 CFR Part 576 for complete information about all eligible costs and program requirements.

The county was awarded \$205,067.00 in FY 2020 ESG grant funds.

In accordance with 24 CFR Part 576.203(a)(2), within 180 days after the date that HUD signs the ESG grant agreement, the recipient must obligate the total grant amount, except the amount for its administrative costs. In addition, the recipient must draw down and expend funds from each year's grant not less than once during each quarter of the recipient's program year. In accordance with 24 CFR Part 576.203(a)(2)(b), all the recipient's grant funds must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient.

Our review determined that the county has met its FY 2020 obligation requirement of \$205,067.00 in ESG funds during this reporting period, and expended grant funds in the amount of \$165,560.39 as of the date of this review. There are FY 2020 remaining grant funds in the amount of \$39,506.61 left to be expended by 01/25/2023, in order to meet the 24-month expenditure deadline date of the grant award. Activities were deemed eligible in accordance with 24 CFR 576, and not more than 7.5% of the grant amount was expended for administrative activities.

The matching contributions to supplement the recipient's ESG requirements, in an amount that equals the amount of ESG funds provided by HUD and limits on the use of street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance and HMIS activities appear to have been met.

Beginning in October 2017, Emergency Solutions Grants (ESG) Program Recipients may submit their Homeless Management Information System (HMIS) data in the SAGE HMIS Reporting Repository (SAGE). This means that recipients will no longer use ESG-CAPER Annual Reporting Tool (eCart). Instead, project reports (Comma Separated Value (CSV) downloads) generated by HMIS or comparable databases that were previously uploaded into eCart can be uploaded directly into SAGE. The county's FY 2020 ESG CAPER was not submitted via the SAGE

system. In order to be in compliance with federal rules and regulations, please submit the report as soon as possible. Guidance on submitting the CAPER thru the SAGE system may be obtained at the following link: [ESG CAPER Submission Guidance - HUD Exchange](#)

Emergency Solutions Grant (ESG) - CV 1 and CV 2

The CARES Act appropriated federal funds through the Emergency Solutions Grants (ESG) Program “to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus under the Emergency Solutions Grants program (42 U.S.C. 11371).”

Emergency Solutions Grants (ESG) recipients are required to submit ESG CARES Act (ESG-CV) reports in Sage each quarter beginning in October 2020. This training series for state/territory ESG recipients will detail the ESG-CV reporting requirements and provide a live demonstration of the reporting process in Sage. The series consists of three parts: 1.) ESG-CV Reporting Part One: ESG-CV Reporting Requirements Overview 2.) ESG-CV Reporting Part Two: Sage Submission Process Walk Through and Detailed Instructions 3.) ESG-CV Reporting Part Three: ESG-CV Office Hours (three sessions – with a Q/A only format). ESG-CV Reporting Requirements Training Series for Territory ESG Recipients are available in the HUD Exchange. The Federal Register Notices for each program are posted on the HUD website as listed below:

- ESG-CV Notice: <https://www.hud.gov/sites/dfiles/OCHCO/documents/20-08cpdn.pdf>

The Notice also requires recipients to fully expend their entire grant amount by September 30, 2022. In addition to the progressive spending deadlines, the ESG-CV allocation requires quarterly performance reports and drawdowns.

The county was awarded \$3,183,770.00 in FY 2020 ESG - CV 1 and CV 2 grant funds.

ESG-CV Expenditure Deadline Updates:

In accordance with HUD’s discretion regarding the March 31, 2022, expenditure deadline, HUD determined it will not recapture funds from recipients who do not meet that deadline.

On February 07, 2022, HUD provided Emergency Solutions Grants (ESG) recipients with updates regarding the expenditure deadlines HUD set forth in **Notice CPD-21-08**. The Notice established spending parameters to ensure ESG funds provided under the CARES Act (ESG-CV) are used to provide urgent assistance to households experiencing homelessness during the COVID-19 pandemic. As stated in the ESG-CV Notice, HUD may recapture:

- Up to 20 percent of a recipient’s total award, including first and second allocation amounts, if a recipient has not spent at least 20 percent of their total grant by September 30, 2021
- Up to 80 percent of a recipient’s total award, including first and second allocation amounts, if a recipient has not spent at least 80 percent of their total grant by March 31, 2022.

Performance Measurement

In September 2004, CPD Notice 03-09 was sent to all grantees in reference to Local Performance Measurement Systems for CPD Formula Grant Programs. In this notice it strongly recommends the use of a performance measurement system in order to account for productivity and program impact. Productivity displays the quantity, quality, and time a grantee undertakes activities. Program impact reflects how activities yield desired outcomes within the community and the persons assisted. The Field office reiterated the importance of determining whether the county is currently using a performance measurement system, developing a system, or has not yet developed a system.

Beginning October 1, 2006, each Consolidated Annual Performance and Evaluation Report (CAPER) or Performance and Evaluation Report (PER) should include the status of the grantee's efforts toward implementing a performance measurement system as described in the Federal Register Notice dated March 7, 2006. All CAPER or PER reports should provide a description of how the jurisdiction's program provided new or improved availability/accessibility, affordability, sustainability of decent housing, a suitable living environment, and economic opportunity. The CAPER/PER must include a 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.

A review of the IDIS CDBG Performance Measures Report (PR83 - CDBG) and the Housing Performance Report (PR85 - HOME) disclosed that the county is inputting data for its activities.

Concerns

There are some performance issues that require action for resolution as a result of our review of your Consolidated Annual Performance and Evaluation Report (CAPER) for FY 2020:

Concerns:

1) CDBG Activities - At Risk Dashboard:

The county's CDBG Activities - At Risk Dashboard Report (PR 59) is currently showing the following activities flagged as overdue and pending grantee's action:

Awaiting Grantee's Required Explanation and Remediation Plan (4 Activities)

IDIS Activity	Activity	Year	Remediation Plan Submission Deadline	National Objective	Matrix Code	Fund Date	Overdue	1 Year no Draw	3 Year No Acc	80% Drawn No Acc
619	Esperanza Community Center Constr - Imm	2020	8/8/2022	LMA	03E	5/10/2021		X		
620	Peters Avenue Sidewalk	2020	8/8/2022	LMA	03L	5/10/2021		X		
621	Immokalee Fire Station construction	2020	8/8/2022	LMA	03O	5/10/2021		X		
578	Land Acquisition for Housing - Habitat for Humanity	2018	7/26/2022	LMH	01	1/22/2019		X		

The county must ensure that the activity is completed by the target completion date in the remediation action plan via IDIS. Additional information can be found at:

<https://www.hudexchange.info/onecpd/assets/File/IDIS-Online-Reports-User-Guide-PR51-60.pdf>

2) **Slow moving activities:**

A review of the county’s reporting data (IDIS Report PR02) - List of Activities by Program Year and Project, are showing a number of old funded activities with large balances, no draws made, or activities incorrectly reported. The activities identified in the report are as follows:

IDIS Activity #	Activity Name	PY	Program	Status	Funded Amount	Drawn Amount	Balance
561	Immokalee Fire Station Land Acquisition	2017	CDBG	OPEN	\$264,033.03	\$264,033.03	\$0.00
570	CCHA TBRA	2017	HOME	OPEN	\$628,780.00	\$566,617.18	\$62,162.82
578	Land Acquisition for Housing - Habitat for Humanity	2018	CDBG	OPEN	\$1,000,000.00	\$1,000,000.00	\$0.00
592	HOME Admn 2018-19	2018	HOME	OPEN	\$72,896.44	\$72,896.44	\$0.00

It’s recommended that the county, where appropriate, reprogram large balances or funds remaining from completed activities, and accurately report on open activities with \$0 balance and old activities with balances, as soon as possible, but no later than 30 days from receipt of this letter. By doing so, it will aid to avoid erroneous reporting and will assist the county in meeting its timeliness test. For additional information on the reporting requirements for the CAPER please visit HUD’s website at:

<https://www.hudexchange.info/programs/idis/idis-reporting/>

Fair Housing and Equal Opportunity (FHEO)

The Office of Fair Housing and Equal Opportunity (FHEO) is required to conduct an analysis of each grantee's Consolidated Annual Performance Evaluation Report (CAPER) to ensure compliance with the civil rights requirements to affirmatively further fair housing as required in 24 CFR 91.225(a)(1), 91.325(a)(1), and 91.425(a)(1)(I). Affirmatively furthering fair housing means that each grantee will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, taken appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions taken in this regard.

The *Fair Housing Planning Guide* contains valuable information, which may assist you in your revisions and future CAPER, and Annual Action Plan submissions.

The FHEO evaluation of the county’s FY 2020 CAPER submission is based, in part, on their review of various Civil Rights Certifications; the Analysis of Impediments (AI); geographic distribution and areas of minority concentrations along with program benefit for minority persons and persons with disabilities.

Please be reminded that the county is obligated to maintain a current Analysis of Impediments (AI) and affirmatively further fair housing choice in its annual plans, activities, and reports until the county submits its first Assessment of Fair Housing (AFH-formerly the AI) under the Affirmatively Further Fair Housing (AFFH) Final Rule published July 16, 2015, and the Federal Register /Vol. 83, No. 4 / published on Friday, January 5, 2018.

Overall, the county is meeting FHEO Civil Rights Related program requirements, as well as HUD regulations at 24 CFR 91.520 and no issues or concerns were identified.

**The Housing and Economic Recovery Act of 2008
And The American Recovery and Reinvestment Act of 2009 Programs***

NSP is a component of the Community Development Block Grant (CDBG) Program, the CDBG regulatory structure is the platform used to implement NSP. The regulations created by the Office of the Assistant Secretary of Community Planning and Development that pertain to Community Development programs are contained within 24 CFR part 570 - Community Development Block Grants. NSP is governed by CDBG regulations except where specifically waived.

Neighborhood Stabilization Program (NSP-1)

The Neighborhood Stabilization Program (NSP-1) was authorized under Division B, Title III of the Housing and Economic Recovery Act (HERA) of 2008 - Emergency Assistance for the Redevelopment of Abandoned and Foreclosed Homes. This Act is the authorizing legislation for NSP. The law allocates \$3.92 billion in NSP1 funding. It also includes requirements related to allocations, timeliness, eligible activities, income eligibility, national objectives, program income, relocation, purchase discounts, affordability and sales price, and other requirements.

The county received \$7,306,755 in NSP-1 fiscal year 2009 grant funds and has expended \$ 9,893,859.42 of its NSP-1 grant funds which includes program income.

Quarterly Progress Reports (QPR's):

Our review of the county's Quarterly Progress Reports revealed that the county is in compliance with the timely submittal of Quarterly Progress Report (QPR's).

The county is required to continue reporting in the Disaster Recovery Grant Reporting (DRGR) system-

It appears that the county's activities are complete, and the grant is ready for closeout.

If you have not been contacted regarding closeout of this grant, please contact our office in order to determine readiness and to receive a closeout package. Thereafter, we will review the status of the NSP grant and confirm that additional documentation is needed or that all closeout criteria have been met.

Neighborhood Stabilization Program (NSP-2)

This Act is the authorizing legislation for the second round of funding for NSP under Division A, Title XII of the American Recovery and Reinvestment Act of 2009 - Community Development Fund.

Neighborhood Stabilization Program (NSP-3)

The Neighborhood Stabilization Program (NSP-3) was authorized under Section 1497 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. This Act is the authorizing legislation for the third round of funding for NSP. It also amends the 25 percent set-aside requirement by removing the restriction that allows only abandoned or foreclosed upon homes or residential properties to be used to meet this requirement. Instead, NSP grantees may also use vacant or demolished property to meet the set-aside requirement as well.

The county received \$3,884,165 in NSP-3 fiscal year 2011 grant funds and has expended \$4,272,165 of its NSP3 grant funds which includes program income.

Quarterly Progress Reports (QPR's):

Our review of the county's Quarterly Progress Reports revealed that the county is in compliance with the timely submittal of Quarterly Progress Report (QPR's).

The county is required to continue reporting in the Disaster Recovery Grant Reporting (DRGR) system.

It appears that the county's activities are complete, and the grant is ready for closeout.

If you have not been contacted regarding closeout of this grant, please contact our office in order to determine readiness and to receive a closeout package. Thereafter, we will review the status of the NSP grant and confirm that additional documentation is needed or that all closeout criteria have been met.

Overall Evaluation and Conclusion

Our review of the annual performance report indicates that the activities carried out by the county during the program year were generally eligible or otherwise consistent with applicable CDBG, CDBG - CV, NSP, HOME, ESG and ESG - CV federal regulations.

The county's actions in the program year were consistent with the actions proposed to address identified priority needs. Results in achieving goals that were envisioned in the Consolidated Plan were satisfactory.

The county's approach to community development activities is comprehensive and creative and reflects internal coordination and cooperation with its citizens.

To facilitate and expedite citizen access to our performance assessment, we request that you apprise the general public, interested citizen's organizations and non-profit entities, of its availability. If, for any reason, the county chooses not to do so, please be advised that our office is obligated to make this letter available to the public. We appreciate your cooperation in this matter.

It is also recommended that the county retain this assessment letter and make it available to its Independent Public Accountant (IPA).

In conclusion, as a result of our analysis we have determined that your overall progress is satisfactory. This determination is based upon the information available to this office and does not reflect a comprehensive evaluation of specific activities.

Attached please find important information that would assist you in administering your CPD programs.

This office is available to assist you in any way possible. If you have any questions regarding this correspondence, or any other program matter, please do not hesitate to contact Nora Casal Cintron, Senior Community Planning and Development Representative at (305) 520-5009, or via email message at: Nora.E.CasalCintron@hud.gov.

Sincerely,

Lisa Johnson
Director
Office of Community Planning and Development

cc: Ms. Kristi Sonntag, Director, Collier County

Enclosures

FRIENDLY REMINDER:

Instructions for IDIS Cash on Hand Quarterly Report:

Starting in Federal fiscal year 2020 (FY 2020), the Entitlement Communities, Insular Areas, and non-Entitlement Counties in Hawaii are required to complete the Cash on Hand Quarterly Report and submit it to grantee's HUD local field office through IDIS. The new IDIS Cash on Hand Quarterly Report will replace the SF-425 report, and the submission of the SF-425 report will be eliminated. This document provides guidance to CDBG grantees on reporting requirements for the Cash on Hand Quarterly Report.

The field offices will review report's completeness and accuracy. The reporting frequency is the same as previously required of the SF-425, quarterly. The Quarterly Cash on Hand report must be submitted to the respective field office within 30 days after the end of the reporting period. The following Federal fiscal year quarter reporting periods will be used for all quarterly reports.

Reporting Period	Due Date of Report
Quarter 1: 10/1 – 12/31	1/30
Quarter 2: 1/1 – 3/31	4/30
Quarter 3: 4/1 – 6/30	7/30
Quarter 4: 7/1 – 9/30	10/30

The following link at the HUD Exchange provides guidance on reporting requirements for the Cash on Hand Quarterly Report:

<https://www.hudexchange.info/resource/5947/instructions-for-idis-cash-on-hand-quarterly-report/>

eCon Planning Suite:

In May 2012, HUD's Office of Community Planning and Development (CPD) introduced the eCon Planning Suite, including the Consolidated Plan template in IDIS OnLine and the CPD Maps website. The eCon Planning Suite is designed to support grantees and the public to assess their needs and make strategic investment decisions by providing better data and tools and by creating a seamless planning and grants management framework.

Consolidated Plan Template in IDIS Online:

HUD grantees are now required to submit their Consolidated Plan and year one Annual Action Plan using the Consolidated Plan template in IDIS Online. If grantees have an approved multi-year Consolidated Plan, they are not required to use IDIS to submit their Annual Action Plan until the next multi-year strategy is due. CPD Notice 12-009: Use of IDIS to Submit the Consolidated Plan provides an overview of the requirement for HUD grantees to submit these reports in IDIS.

Please note that many of the responses cite references from the Desk Guide for Using IDIS to Prepare the Consolidated Plan, Annual Action Plan, and CAPER/PER ("Desk Guide") which can be accessed at:

<https://files.hudexchange.info/resources/documents/eCon-Planning-Suite-Desk-Guide-IDIS-Conplan-Action-Plan-Caper-Per.pdf>

If you require additional assistance, please submit a question to the HUD Exchange Ask-A-Question desk at:

<https://www.hudexchange.info/get-assistance/my-question/>.

In order to expedite a response, please make sure to indicate that your question is related to “Con Plan: eCon Planning Suite,” specify the screen you are working on and, if applicable, attach a screenshot of any error message received.

Minority Business Enterprises – “MBE”:

Under executive orders 11625, 12432 and 12138 grantees must subscribe procedures acceptable to HUD for a minority outreach program to ensure that they are making concerted efforts to attract minority groups to the procurement process.

Furthermore, the Office of Small and Disadvantaged Business Utilization (OSDBU) is required to collect and consolidate data on Minority Business Enterprise (MBE) on an annual basis. You are encouraged to utilize Woman’s and Minority Business Enterprise participation in all HUD programs. Grantees should submit their information, via email, on HUD form 2516 (Grantee Contract and Subcontract Activity Report). Please note that you may access the forms at:

https://www.hud.gov/sites/documents/DOC_11712.PDF

2022 TRAINING SURVEY

Please help us to identify the areas of training that could benefit your jurisdiction in operating and managing your CPD program(s). Complete the survey below and email it to your CPD Representative.

Please indicate your interest in receiving technical assistance/training below by ranking the importance from the highest (5) to lowest (1).

5 – Very Important 4 – Important 3 – Average 2 – Slightly Important 1 – Not Important

- Development Finance
- Relocation and Real Property
- CHDO Assistance
- Construction and Rehabilitation Management
- Economic Development/Section 108
- Effective Agreements
- Environmental Review and Compliance
- Financial Management
- Efficiency/Green Building
- Homelessness Issues
- IDIS
- Income Determinations
- Lead-Based Paint Compliance
- Neighborhood Stabilization Program –NSP (specify): _____
- Procurement and Contracting
- Subrecipient Management
- Using Outcomes to Measure Performance
- Recordkeeping and Reporting
- Debarment, Suspension, and Termination
- Audits
- Program Monitoring
- Federal Labor Standards
- DRGR
- HMIS
- Emergency Solutions Grant
- Basic CDBG Program
- Advanced CDBG Program
- Meeting CDBG Timeliness Test Requirements
- Timesheet Records Compliance
- Activity Delivery vs. Program Administrative Costs
- Property Management and Disposition
- Program Income
- Basic HOME Investment Partnerships Program
- Advanced HOME Investment Partnerships Program

- HOME Match Report/Log
- Subsidy Layering Review
- Meeting Commitment/Disbursement/CHDO Set-Aside Deadlines
- Resale/Recapture Provisions
- Maximum Purchase Price/After-Rehab Value Compliance
- Rental Project Compliance
- Rent Determinations
- Housing Quality Inspections
- Affirmative Marketing
- Accessing HOME and Low-Income Housing Tax Credits (LIHTC) Projects
- HOPWA (i.e.: reporting, monitoring oversight, financial mgmt.): _____
- Combining Multiple Community Planning & Development Programs
- Fair Housing Compliance
- Civil Rights Compliance Basic CDBG Program
- Section 504 Compliance
- Equal Opportunity Compliance
- Section 3 Compliance
- Conflict of Interest Determinations
- eCon Planning Suite
- Consolidated Plan/Action Plan Preparation
- Other (Please specify): _____
