



U.S. Department of Housing and Urban Development
Community Planning & Development Division
Region IV, Miami Field Office
Brickell Plaza Federal Building
909 SE First Avenue, Room 500
Miami, FL 33131-3042

February 19, 2020

Mr. Jonathan Brown
Director
Housing and Economic Sustainability
Palm Beach County
100 South Australian Ave., 5th Floor
West Palm Beach, FL 33406

Subject: Annual Community Assessment
Consolidated Annual Performance and Evaluation Report (CAPER)
2018 Program Year - CDBG, HOME, ESG and NSP 1, 2, & 3 Programs
Palm Beach County

Dear Mr. Brown,

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 County received \$6,442,365.00 in CDBG FY 2018 grant funds, and is commended on its performance in expending \$7,443,025.11 or 98.16% on activities benefiting low or moderate-income persons. This performance exceeds departmental standards.

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

The Financial summary indicated \$641,669.98 in net expenditures for planning and administrative costs, or 3.03% of the grant funds plus program income received during the FY 2018 program year. The Financial Summary also showed \$874,744.30 in net expenditures for public services, or 13.57% of the grant. 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 §24CFR 570.208.

We were pleased with the County's economic development performance, in particular its assistance to 380 business that provided funding for the creation or retention of 2,471 full time equivalent (FTE) jobs to benefit low-income persons. In addition, the County provided services to 23,149 individuals with its public facilities and public infrastructure projects that were carried out during the program year.

The County is in compliance with departmental progress standards in the expenditure of its CDBG Line-of-Credit (LOC) balances. The County is required to have no more than 1.5 years of funding available in its LOCC's at the end of the tenth month of its program year. The County's LOCC's balance as of August 2, 2019 was \$9,547,730.02 which represents 1.48 years of funding.

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 2013 must be obligated (put under funding contract to the grantee) by September 28, 2015 (three years). They must be disbursed by the grantee by September 28, 2020 (FY 2013 + 5 years). If the FY 2013 grant funds are not drawn down from the Line of Credit Control System (LOCCS) by the end of FY 2020, they 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 the Miami Field Office for instructions.

HOME

The County received \$2,340,834.00 in HOME FY 2018 grant funds. Our review determined that the County achieved its objective of providing tenant based rental assistance housing assistance resulting in 567 individuals being served. The total HOME disbursements during the year were \$67,580.00, for administrative costs.

Our evaluation of these accomplishments disclosed no concerns with respect to eligibility, income targeting, affordability, or match requirements.

As a reminder, please be aware that any HOME funds appropriated in FY 2013 will not be available for PJs to expend after September 30, 2020. HOME funds remaining in your FY 2013 grant after this date will be recaptured by the United States Treasury. Unexpended HOME funds on grants from 1992 through 2001 are not subject to these rules. However, beginning with the FY 2002 appropriation, each annual HOME grant is subject to this eight-year expenditure rule. So, for example, FY 2013 HOME funds will no longer be available to you after 9/27/2020.

Matching Contribution Requirement - 24 CFR 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 fiscal distress or presidential declared disaster designation by HUD HQ's. The County's FY 2018 annual match requirement contribution of 25% was satisfactorily met.

Emergency Shelter Grant (ESG) /Solutions

The County received \$524,079.00 in FY 2018 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 all the 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 of 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 2018 obligation requirement by committing \$524,079.00 in ESG funds during this reporting period, and expended grant funds in the amount of \$435,153.62 within 24 months of the date of the grant award. Please note that the County has an outstanding balance of \$88,925.38 that must be expended prior to September 30, 2020. 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. The County has made significant progress in assisting homeless persons under the Rapid Rehousing program and homeless shelter program, and is to be commended for its performance in supporting 1329 chronically homeless persons.

Updates to Completing the CAPER for ESG Recipients:

Beginning October 1, 2017, ESG Recipients can begin to submit their HMIS data in the Sage HMIS Reporting Repository (Sage). Recipients will no longer need to use eCart; subrecipients will be able to upload their CAPER-CSV directly into Sage. HMIS and comparable database systems, updated to the 2017 Data Standards, cannot generate the files required for eCart.

Finding

There is a performance issues that requires action for resolution as a result of our review of your Consolidated Annual Performance and Evaluation Report (CAPER) for FY 2018:

ESG Expenditures

Condition: The County received \$519,046.00 in FY 2017 ESG (E17UC120004) grant funds. These funds are required to be spent within the 24-month grant expenditure deadline. The expenditure deadline date was September 22, 2019. The County was contacted after the deadline to submit additional expenditures however there is still a balance of \$12,732.75 that will be recaptured.

Cause: The County failed to expend grant funds prior to the deadline.

Criteria: In accordance to 24 CFR 576.203(b), "All of the recipient's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient."

Effect: By not spending ESG grant funds timely the County has forfeited funds that could be used to help serve the homeless population in the area.

Corrective action: In order to clear this finding, please provide this office with a copy of the county's current ESG policies and procedures that outline the expenditure deadline and an outline as to how the County will ensure that the upcoming grant deadlines are met. Please provide the requested information within 30 days from the receipt of this letter.

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) and the Housing Performance Report (PR85) disclosed that the County is not 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 2018:

(1) Slow moving activities:

A review of the County’s reporting data (IDIS Report # PR02) - List of activities by program year and project, in the Integrated Disbursement and information System (IDIS) are showing a number of old funded activities with large balances, no draws made, or activities incorrectly reported. The activities identified in the report is as follows:

IDIS Activity #	Activity Name	PY	Program	Status	Funded Amount	Drawn Amount	Balance
3382	Thirteen Street Industrial Park	2002	CDBG	Open	\$1,660,000.00	\$1,660,000.00	\$0.00
3404	B-02 Planned Repayment Principal	2002	CDBG	Open	\$1,218,000.00	\$1,218,000.00	\$0.00
3405	B-02 Planned Repayment Interest	2002	CDBG	Open	\$846,250.00	\$846,250.00	\$0.00
3375	Glades Gas & Electric Corporation	2007	CDBG	Open	\$199,000.00	\$199,000.00	\$0.00
3376	Glades Home Health Care Medical Center, LLC.	2007	CDBG	Open	\$89,000.00	\$89,000.00	\$0.00
3377	Muslet Brothers, Inc.	2007	CDBG	Open	\$878,000.00	\$878,000.00	\$0.00
3378	America's Sound	2007	CDBG	Open	\$592,000.00	\$592,000.00	\$0.00
3383	Shatara – Building 172 West Avenue A 2013	2007	CDBG	Open	\$51,000.00	\$51,000.00	\$0.00
3384	Shatara – Building 172 West Avenue A 2011	2007	CDBG	Open	\$21,000.00	\$21,000.00	\$0.00
3385	BI Development – Old City Hall #2	2007	CDBG	Open	\$770,000.00	\$770,000.00	\$0.00
3410	B-07 Planned Repayment Principal	2007	CDBG	Open	\$909,200.00	\$909,200.00	\$0.00
3411	B-07 Planned Repayment Interest	2007	CDBG	Open	\$156,125.00	\$156,125.00	\$0.00
3316	PBC Parks and Rec – Canal Point Community Center Playground	2008	CDBG	Open	\$97,369.00	\$97,369.00	\$0.00

3418	B-08 Planned Repayment Principal - Final Draw	2008	CDBG	Open	\$194,000.00	\$194,000.00	\$0.00
3419	B-08 Planned Repayment Interest - Final Draw	2008	CDBG	Open	\$128,586.00	\$128,586.00	\$0.00
3269	GUS Distributing Corporation	2008	CDBG	Open	\$196,000.00	\$196,000.00	\$0.00
3271	Pinewood Cleaners	2008	CDBG	Open	\$179,000.00	\$0.00	\$179,000.00
3273	B-08 108 Loan Pool Final Draw	2008	CDBG	Open	\$1,898,000.00	\$1,898,000.00	\$0.00
3379	The Baron Group, Inc.	2008	CDBG	Open	\$1,000,000.00	\$1,000,000.00	\$0.00
3380	Kiddie Haven Pre-School 2010	2008	CDBG	Open	\$57,000.00	\$57,000.00	\$0.00
3381	Donia Roberts, PA	2008	CDBG	Open	\$265,000.00	\$265,000.00	\$0.00
3386	Concrete Services	2008	CDBG	Open	\$250,000.00	\$250,000.00	\$0.00
3387	Ameliascapes	2008	CDBG	Open	\$198,000.00	\$198,000.00	\$0.00
3389	F&T of Belle Glade	2008	CDBG	Open	\$257,000.00	\$257,000.00	\$0.00
3390	Oxygen Development 2010	2008	CDBG	Open	\$5,948,000.00	\$5,948,000.00	\$0.00
3392	Glades Plaza Enterprise 2011	2008	CDBG	Open	\$1,412,000.00	\$1,412,000.00	\$0.00
3393	Scientific Organica	2008	CDBG	Open	\$473,000.00	\$473,000.00	\$0.00
3394	Schomburg Latin America	2008	CDBG	Open	\$455,000.00	\$455,000.00	\$0.00
3395	Medical Career Institute of South Florida, Inc.	2008	CDBG	Open	\$264,000.00	\$264,000.00	\$0.00
3396	A&E Auto Sales and Repair, Inc.	2008	CDBG	Open	\$244,000.00	\$244,000.00	\$0.00
3397	SSB Investment	2008	CDBG	Open	\$244,000.00	\$244,000.00	\$0.00
3398	Magic Bubbles, Inc.	2008	CDBG	Open	\$0.00	\$0.00	\$0.00
3416	B-08 Planned Repayment Principal	2008	CDBG	Open	\$4,759,000.00	\$4,759,000.00	\$0.00
3417	B-08 Planned Repayment Interest	2008	CDBG	Open	\$665,854.00	\$665,854.00	\$0.00
2523	Glades Hospital Holdings (CDBG)	2009	CDBG	Open	\$285,000.00	\$225,000.00	\$60,000.00
3412	B-09 Planned Repayment Principal	2009	CDBG	Open	\$86,000.00	\$86,000.00	\$0.00
3415	B-09 Planned Repayment Interest	2009	CDBG	Open	\$14,283.00	\$14,283.00	\$0.00
3272	B-09 & B-11 Loan Pools Final Draw	2009	CDBG	Open	\$3,400,000.00	\$3,400,000.00	\$0.00
3413	B-09 Planned Repayment Principal - Final Draw	2009	CDBG	Open	\$505,000.00	\$505,000.00	\$0.00

3414	B-09 Planned Repayment Interest – Final Draw	2009	CDBG	Open	\$138,182.00	\$138,182.00	\$0.00
3348	PBC Parks and Recreation – Lake Lytal Park	2009	CDBG	Open	\$26,863.00	\$26,143.00	\$720.00
3349	PBC Parks and Recreation - Lake Lytal Park	2010	CDBG	Open	\$221,120.00	\$221,120.00	\$0.00
3156	City of South Bay - Tanner and Cox Park Improvements	2010	CDBG	Open	\$465,182.88	\$465,182.88	\$0.00
3399	Jupiter CY, LLC	2010	CDBG	Open	\$2,300,000.00	\$2,300,000.00	\$0.00
3400	BI Development – Old City Hall #1	2010	CDBG	Open	\$258,000.00	\$258,000.00	\$0.00
3401	Oxygen Development 2018	2010	CDBG	Open	\$1,000,000.00	\$1,000,000.00	\$0.00
3402	Simplified Fabricators	2010	CDBG	Open	\$600,000.00	\$600,000.00	\$0.00
3403	Prestige Commercial Kitchens	2010	CDBG	Open	\$373,000.00	\$373,000.00	\$0.00
3406	B-10 Planned Repayment Principal	2010	CDBG	Open	\$1,352,000.00	\$1,352,000.00	\$0.00
3407	B-10 Planned Repayment Interest	2010	CDBG	Open	\$117,517.00	\$117,517.00	\$0.00
3420	Glades Hospital Holdings	2010	CDBG	Open	\$60,000.00	\$60,000.00	\$0.00
3045	Kiddie Haven Pre-School	2011	CDBG	Open	\$131,000.00	\$131,000.00	\$0.00
3408	B-11 Planned Repayment Principal	2011	CDBG	Open	\$48,000.00	\$48,000.00	\$0.00
3409	B-11 Planned Repayment Interest	2011	CDBG	Open	\$6,065.00	\$6,065.00	\$0.00
3322	PBC Parks and Recreation – John Prince Park Recreation Center	2013	CDBG	Open	\$81,961.83	\$81,961.83	\$0.00
3274	PBC Water Utilities – Runyon Village Infrastructure	2014	CDBG	Open	\$460,862.18	\$174,907.90	\$285,954.28
3263	PBC Water and Recreation – Lake Lytal Park	2014	CDBG	Open	\$154,411.68	\$118,590.52	\$35,821.16
3421	Westgate-Belvedere Homes CRA – Oswego Oaks Neighborhood Park	2014	CDBG	Open	\$102,339.04	\$102,339.04	\$0.00
3113	Gulfstream Goodwill – Lease of Vehicle	2014	CDBG	Open	\$70,000.00	\$60,400.14	\$9,599.86
3114	Section 108 Debt Service Reserve	2014	CDBG	Open	\$100,000.00	\$43,802.49	\$56,197.51

3373	Pahokee Housing Authority – Padgett Island/Fremd	2014	CDBG	Open	\$460,823.23	\$460,823.23	\$0.00
3391	City of Belle Glade – Code Enforcement Vehicle Lease	2015	CDBG	Open	\$15,474.87	\$9,120.66	\$6,354.21
3262	PBC Parks and Rec. – Canal Point Community Center Playground	2015	CDBG	Open	\$184,000.00	\$178,516.52	\$5,483.48
3317	PBC Parks and Recreation – Lake Lytal Park	2015	CDBG	Open	\$6,418.32	\$6,205.25	\$213.07
3422	Westgate Belvedere Homes CRA – Oswego Oaks Neighborhood Park	2015	CDBG	Open	\$97,343.71	\$97,343.71	\$0.00
3440	City of South Bay – Cox/Tanner Park Improvements	2015	CDBG	Open	\$1,577.68	\$1,577.68	\$0.00
3388	Pahokee Housing Authority – Padgett Island/Fremd Village Sewer Rehab	2015	CDBG	Open	\$139,176.77	\$139,176.77	\$0.00
3145	DES Countywide Capital Project Implementation	2015	CDBG	Open	\$357,192.00	\$337,075.34	\$20,116.66
3298	Town of Mangonia Park – Addie Greene Park Improvements	2016	CDBG	Open	\$0.00	\$0.00	\$0.00
3301	Village of Palm Springs- Foxtail Palm Park	2016	CDBG	Open	\$239,900.00	\$2,800.00	\$237,100.00
3313	PBC Parks and Rec – John Prince Park Therapeutic Recreation Center	2016	CDBG	Open	\$0.00	\$0.00	\$0.00
3341	PBC Parks and Recreation – Bridgeman Drive Park	2016	CDBG	Open	\$325,000.00	\$2,750.00	\$322,250.00
3423	Westgate Belvedere Homes CRA – Oswego Oaks Neighborhood Park	2016	CDBG	Open	\$3,217.94	\$3,217.94	\$0.00

3428	Palm Beach Habilitation Center – JB Ranch Group Home	2016	CDBG	Open	\$34,661.60	\$34,661.60	\$0.00
3441	City of South Bay – Cox/Tanner Park Improvements	2016	CDBG	Open	\$1,131.62	\$1,131.62	\$0.00
3252	DES Countywide Capital Project Implementation	2016	CDBG	Open	\$357,192.00	\$109,444.69	\$247,747.31
3306	City of Belle Glade – Code Enforcement	2017	CDBG	Open	\$150,447.00	\$132,769.41	\$17,677.59
3350	PBC Facilities Development – Lewis Center HRC Navigation Unit	2017	CDBG	Open	\$254,000.00	\$28,313.00	\$225,687.00
3299	Town of Mangonia Park – Sanitary Sewer Improvements	2017	CDBG	Open	\$0.00	\$0.00	\$0.00
3430	City of Riviera Beach – Avenue O, 28 th , 30 th and 36 th Streets Improvements	2017	CDBG	Open	\$177,587.00	\$177,587.00	\$0.00
3312	HES Economic Development Services	2017	CDBG	Open	\$471,818.00	\$286,839.88	\$184,978.12
3303	HES Countywide Capital Project Implementation	2017	CDBG	Open	\$250,000.00	\$22,918.76	\$227,081.24
3275	Community Services TBRA Program	2010	HOME	Open	\$249,240.50	\$249,240.50	\$0.00
3431	Community Land Trust of Palm Beach County	2012	HOME	Open	\$180,883.39	\$180,883.39	\$0.00
3437	Community Land Trust (CLT) Scattered Sites	2012	HOME	Open	\$95,000.00	\$95,000.00	\$0.00
3434	Housing Replacement Program	2012	HOME	Open	\$0.00	\$0.00	\$0.00
3326	Community Land Trust of Palm Beach County	2013	HOME	Open	\$245,783.06	\$245,783.06	\$0.00
3438	Community Land Trust (CLT) Scattered Sites	2013	HOME	Open	\$0.00	\$0.00	\$0.00
3435	Housing Replacement Program	2013	HOME	Open	\$125.00	\$125.00	\$0.00
3184	Community Services TBRA Program	2014	HOME	Open	\$648,883.32	\$648,883.32	\$0.00

3097	HOME Program Administration	2014	HOME	Open	\$116,316.35	\$116,316.35	\$0.00
3204	Grieer, Crisondraa	2014	HOME	Open	\$0.00	\$0.00	\$0.00
3179	Community Services TBRA Program	2015	HOME	Open	\$855,696.78	\$616,666.68	\$239,030.10
3323	Community Services TBRA Program	2015	HOME	Open	\$0.00	\$0.00	\$0.00
3212	Point Du Jour, Abel	2015	HOME	Open	\$65,000.00	\$0.00	\$65,000.00
3213	Ramirez, Alvero & Lorena	2015	HOME	Open	\$65,000.00	\$0.00	\$65,000.00
3214	Joyner, Anthony & Racquel	2015	HOME	Open	\$65,000.00	\$0.00	\$65,000.00
3436	Housing Replacement Program	2015	HOME	Open	\$0.00	\$0.00	\$0.00
3277	HOME Administration and Planning	2016	HOME	Open	\$164,634.00	\$108,527.12	\$56,106.88
3325	Community Services TBRA Program	2016	HOME	Open	\$576,219.00	\$444,847.76	\$131,371.24
3328	Community Land Trust of Palm Beach County	2016	HOME	Open	\$246,951.00	\$32,635.30	\$214,315.70
3439	Community Land Trust (CLT) Scattered Sites	2016	HOME	Open	\$0.00	\$0.00	\$0.00
3295	HOME Administration and Planning	2017	HOME	Open	\$165,456.67	\$57,834.63	\$107,622.04
3432	Community Services TBRA Program	2017	HOME	Open	\$0.00	\$0.00	\$0.00

It's recommended that the County, where appropriate, accurately report on open activities with \$0 balance and/or 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/>

(2) Performance Measurement

A review of the CDBG Performance Measures Report (PR83) and the Housing Performance Report (PR85) disclosed that the County is not inputting data for all activities. Also, the narrative portion of the CAPER did not include a comparison of proposed and actual accomplishment. Please refer to 24 CFR Part § 91.520(j) which states "The report will include a comparison of the proposed versus the 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."

Please be advised that failure to comply with these requirements could result in disapproval of the County's Action Plan. The County may want to refer to the following website for assistance at:

<https://www.hudexchange.info/resource/3085/guidance-for-reporting-cdbg-accomplishments-performance-measures-idis/>

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 C.F.R. 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 2018 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.

The FHEO evaluation of County's FY 2018 CAPER submission is currently under review. Once the review is completed, any issues identified will be communicated in a separate letter.

Office of Public and Indian Housing (OPIH)

The Office of Public and Indian Housing (OPIH) was also required to conduct an analysis of the County's FY 2018 Consolidated Annual Performance Evaluation Report (CAPER). This request was intended for the accuracy of any data shown for the local PHAs, the County's housing inventory and the plan in general. The OPIH evaluation of the County's FY 2018 CAPER submission is currently under review. Once the review is completed, any issues identified will be communicated in a separate letter.

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

Neighborhood Stabilization Program (NSP-1)

The Neighborhood Stabilization Program (NSP-1) was authorized under the Housing and Economic Recovery Act (HERA) of 2008.

The County of Palm Beach received \$27,700,340.00 in NSP-1 fiscal year 2009 grant funds and has expended \$28,540,742.00 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 the 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. Our records indicate that you have remaining grant funds in the amount of \$2,145,871 subject to recapture.

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)

The Neighborhood Stabilization Program (NSP-2) was authorized under the American Recovery and Reinvestment Act of 2009 and the Housing and Economic Recovery Act (HERA) of 2008.

The County of Palm Beach received \$50,000,000.00 in NSP-2 fiscal year 2010 grant funds and has expended \$51,248,570.00 or 100% of its NSP-2 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 the 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. Our records indicate that you have no remaining grant funds.

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-3)

The Neighborhood Stabilization Program (NSP-3) was authorized under Section 1497 of the Wall Street Reform and Consumer Protection Act (Dodd-Frank) of 2010.

The County of Palm Beach received \$11,264,172.00 in NSP-3 fiscal year 2011 grant funds and has expended \$11,499,214.00 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 the 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. Our records indicate that you have remaining grant funds in the amount of \$173,122.00 subject to recapture.

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, NSP, HOME, and ESG 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 and 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.

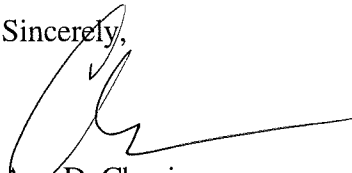
It is also recommended that the County retain this assessment letter and make it available to its Independent Public Accountant (IPA).

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 Jill Smolen, Senior Community Planning and Development Representative at (305) 520-5023, or via email message at: Jill.C.Smolen@hud.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ann D. Chavis', with a long horizontal line extending to the right.

Ann D. Chavis
Director
Community Planning and Development Division

Lisa Bustamante, Program Manager, US HUD

Enclosures

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://www.hudexchange.info/resource/2641/econ-planning-suite-desk-guide-idis-conplan-action-plan-caper-per/>.

If you require additional assistance, please submit a question to the HUD Exchange Ask-AQuestion 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:

<http://www.hud.gov/offices/osdbu/forms/hud2516.xls>.

2020 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 no later than April 1, 2020, and either email or fax it to your CPD Representative or to John Quade, CPD Representative at john.f.quade@hud.gov or (305) 520-5018.

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): _____
