



U.S. Department of Housing and Urban Development

Region IV, Miami Field Office
Brickell Plaza Federal Building
909 SE First Avenue, Rm. 500
Miami, FL 33131-3042

March 13, 2017

Scott Stoudenmire, Deputy Director
Department of Sustainable Development
City of Coconut Creek
4800 W. Copans Road
Coconut Creek, FL 33063

Subject: Annual Community Assessment
Consolidated Annual Performance and Evaluation Report (CAPER)
2015 Program Year – CDBG Program
City of Coconut Creek

Dear Mr. Stoudenmire:

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.

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

SUMMARY OF PERFORMANCE

Community Development Block Grant (CDBG)

The City received \$265,061.00 in CDBG FY 2015 grant funds, and is commended on its performance in expending \$193,364.11 or 100% on activities benefiting low or moderate-income persons. This performance exceeds departmental standards.

The Financial summary indicated \$39,084.17 in net expenditures for planning and administrative costs, or 12.37% of the grant funds plus program income received during the FY 2015 program year. The Financial Summary also showed \$0 in net expenditures for public services, or 0.00% 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.

The City's housing assistance performance, in particular its affordable housing activities funding for housing rehabilitation resulting in the completion of one (1) home to benefit low-moderate-income households.

The City's housing assistance resulted in homeownership to benefit two (2) low-moderate-income households.

In addition to providing decent housing and a suitable living environment, the City may also want to consider expanding economic opportunities for its low- and moderate-income persons.

We are pleased to report that the City is in compliance with departmental progress standards in the expenditure of its CDBG Line-of-Credit (LOC) balances. The City 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 City's LOCC's balance as of August 2, 2016 was \$330,273.51, which represents 1.25 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 2010 must be obligated (put under funding contract to the grantee) by September 30, 2012 (three years). They must be disbursed by the grantee by September 30, 2017 (FY 2012 + 5 years). If the FY 2010 grant funds are not drawn down from the Line of Credit Control System (LOCCS) by the end of FY 2017, 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.

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 City 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) Performance Report City inputting data for its activities.

(1) Slow moving activities –

A review of the City's reporting data (IDIS Report # RC04PR02) - List of activities by program year and project, in the Integrated Disbursement and information System (IDIS) is showing an old funded activity with large balances, no draws made, or activities incorrectly reported. The activity identified in the report is as follows:

IDIS Activity #	Activity Name	PY	Program	Status	Funded Amount	Drawn Amount	Balance
31	Residential Rehab/MHR	2012	CDBG	Open	\$57,132.45	\$50,432.18	\$6,700.27

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.

Additionally, the *Fair Housing Planning Guide* is available on the Hudweb at:

<http://www.hud.gov/offices/fheo/images/fhpg.pdf>

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 City's 2015 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.

The FHEO evaluation of the City's FY 2015 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 City's FY 2015 Consolidated Annual Performance Evaluation Report (CAPER). This request was intended for the accuracy of any data shown for the local PHAs, the City's housing inventory and the plan in general. The Office of Public and Indian Housing review revealed no concerns.

OVERALL EVALUATION AND CONCLUSION

Our review of the annual performance report indicates that the activities carried out by the City during the program year were generally eligible or otherwise consistent with applicable CDBG federal regulations.

The City'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 City'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 City 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 City 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 La Vora B. Bussey, Community Planning and Development Representative at (305) 520-5007, or via email message at: lavora.b.bussey@hud.gov.

Sincerely,



Ann D. Chavis
Director
Community Planning and Development Division

Enclosures

cc: Andrew Azebeokhai, CRA of FL
Lisa Bustamante, Program Manager, US HUD