

April 17, 2014

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

RE: Response – Collier County Annual Community Assessment, 2012 Consolidated Annual Performance and Evaluation Report (CAPER)

Dear Ms. Chavis:

Our office is in receipt of your letter dated March 19, 2014. We received the letter in our office on March 31, 2014.

We have worked extremely hard to accomplish the activities and projects outlined in the 2012 CAPER and remain committed to continuing to complete the current projects for the upcoming FY2013 CAPER. We are very pleased that the majority of the letter is commending the County on our accomplishments.

In this letter, we are addressing the following:

**SUMMARY OF PERFORMANCE
Concerns (Page 3):**

- (1) **Slow moving activities:** As has been published in prior timeliness communication with HUD, the County recognizes there is a balance in previous years that is currently unallocated and still identified in IDIS. Collier County had previously reported that reconciliation was required to determine the final amount available for reprogramming. We are pleased to report that Housing, Human and Veteran Services (HHVS) staff has just completed this reconciliation. As is protocol in our agency, the results are under review by our Office of Management and Budget (OMB) Grants Compliance Office. Once approved by OMB, HHVS will re-program these funds to new projects by incorporating the unspent funds into the FY2014-2015 application cycle currently under review.
- (2) **Timeliness:** The County has been periodically submitting work out plans to HUD since 2013; as was noted during the preparation for the October 2013 meeting with the Washington office. Attached is the most recent workout plan (April 7) for review, along with the PR56 report for your review. The current spent/drawdown plan indicates that HHVS is scheduled to draw approximately \$1.7 million between now and the end of July. In anticipation of the August 2,



of Collier County

3339 Tamiami Trail East, Suite 211 • Naples, FL 34112-5361

239-252-CARE (2273) • 239-252-HOME (4663) • 239-252-CAFÉ (2233) • 239-252-RSVP (7787) • 239-252-VETS (8387) • www.colliergov.net/humanservices



2014 timeliness test deadline, we are estimating our ratio to be within required limits. We will continue to submit monthly workout plans to our CPD representative, Nora Casal.

(3) **HOME Commitments/Disbursement – Expenditures – Red Flags:** HHVS acknowledges that there are 2 “red flags” in SNAPSHOTS regarding the percentage of renters below 50% of AMI and the percentage of completed CHDO disbursements. Our fiscal and operations staff has completed the following steps to address these red flags. They were: draw down completed on April 15, 2014 in the amount of \$30,122.31 and the accomplishments have been reported in IDIS. Project has been closed.

(4) **Financial Audits:** Collier is in receipt of the noted letter, and is in the process of preparing a reply.

OVERALL EVALUATION AND CONCLUSION

HHVS will post the HUD letter on our website, along with our response. We acknowledge that we will also share the letter and response with our Independent Public Account (IPA).

Thank you for taking the time to respond to our CAPER. We appreciate your comments and concerns. As partners, we will work together to accomplish the goals outlined in this letter and in our CDBG/HOME/ESG programs now and in the future.

Should you have any questions or need more information, please do not hesitate to contact me at (239) 252-6287 or email at KimberleyGrant@Colliergov.net.

Sincerely,



Kimberley Grant
Director

Cc: Lisa Bustamante, Program Manager, US HUD
Nora E. Casal, CPD Representative, US HUD
Therese Stanley, Grant Compliance Office of Collier OMB
Elly McKuen, Grant and Housing Coordinator

Grantee: Collier County

Updated: 4/7/2014

1,144,227

CDBG Workout Plan 2013-14

Funds Projected (Scheduled) / Funds Drawn (Actual)

by: October 1, 2014

Activity Number wbs #	Activity Name PGM YR (Program Year Funds)	(1) Original Funded OR Blc Amt	(2) Amount Drawn as of 9/30/2013	(3) Balance as of 10/1/2013	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
					Drawdown October 2013	Drawdown November 2013	Drawdown December 2013	Drawdown January 2014	Drawdown February 2014	Drawdown March 2014	Drawdown April 2014	Drawdown May 2014	Drawdown June 2014	Drawdown July 2014	Drawdown August 2014	Drawdown Sept 2014	Total Projected Expenditures \$ Actual	Total Undrawn Balance
374 33088.4	DLC-Crisis Stabilization Unit/Construction PGM YR Funds: 2010	22,100	-	22,100	22,100												22,100	-
379 33088.5	Immokalee CRA-Business Incubator/Jobs PGM YR Funds: 2010	72,693	14,558	58,135													-	58,135
409 33176.2.6	CCHA - TBRA Admin PGM YR Funds: 2011	27,500	10,000	17,500		5,000		10,000									15,000	2,500
410 33176.2.2	Guadalupe Center-Jobs (Dev Assistant) PGM YR Funds: 2011	19,045	17,918	1,127		1,127											1,127	-
412 33176.1	2011 CDBG Planning & Administration PGM YR Funds: 2011	57,173	57,173	-													-	-
419 33176.2.5	CC Parks&Rec-South Immokalee Park-VPK PGM YR Funds: 2011	775,016	-	775,016		127,121				469,693	158,622						755,436	178,202
420 33088.15	Immokalee CRA-Placita 2011 Project PGM YR Funds: 2004,2010,2012 (reprogram)	720,644	-	720,644	67,149			32,882			250,000	250,000	120,613				720,644	620,614
424 33236.2.5	SAWCC - Legal Services PS PGM YR Funds: 2012	144,500	71,844	72,656	11,535	14,459		23,196	8,271			2,195	2,000		11,000		72,656	15,195
427 33236.2.3	City of Naples - Playground Equipment PGM YR Funds: 2012	105,835	-	105,835									105,835				105,835	105,835
428 33236.2.1	David Lawrence Center-Access to Wellness PGM YR Funds: 2012	180,000	46,717	133,283	5,993	10,434		92,112	5,400	2,380	16,464						132,783	16,964
429 33236.2.2	Youth Haven-Safe Secure Youth Home PGM YR Funds: 2012	221,000	-	221,000				72,359		126,541	22,100						221,000	22,100
430 33236.2.4	Immokalee CRA-Imm Business Center PGM YR Funds: 2012	61,087	29,577	31,510				8,486					31,510				39,996	23,024
431 33236.1.1	2012 CDBG Planning & Administration PGM YR Funds: 2012	334,108	265,173	68,935	51,037	17,899											68,936	(1)
432 33236.3.1	2012 CDBG Fair Housing PGM YR Funds: 2012	2,000	-	2,000						2,000							2,000	2,000
437 04 & 09	ABLE ACADEMY - Total funded: \$515K \$500K=Kaicasa (2004) + \$15 (2009)	15,000	-	15,000				15,000									15,000	-
438 33236.2.9	Naples Equestrian Challenge (2013 Supplemental) PGM YR Funds: 2012	520,000	-	520,000		520,000											520,000	-
439 33176.2.11	INPH - Timber Ridge (2013 Supplemental) PGM YR Funds: 2011	18,250	-	18,250								18,250					18,250	18,250
440 33176.2.13	SAWCC (2013 Supplemental) PGM YR Funds: 2011	174,990	-	174,990				33,004	120,000	10,986							163,990	21,986
441 10,11 & 12	Habitat for Humanity-Reroofs (2013 Supplemental) PGM YR Funds: 2010, 2011 & 2012	235,000	-	235,000					26,238	208,762							235,000	208,762
442 44505.15	Goodwill Ind.-Microenterprise (2013 Supplemental) PGM YR Funds: 2009	32,640	-	32,640				13,986		6,945	2,709						23,640	11,709
443 09 & 10	INPH - Sanders Pines (2013 Supplemental) PGM YR Funds: 2009 & 2010	13,500	-	13,500				13,986		6,945			13,500				13,500	13,500
446 33236.1.2	HHVS Project Delivery (2013 Supplemental) PGM YR Funds: 2012	14,419	-	14,419	4,200	1,800		1,000		1,800				5,619			14,419	5,619
450 several	UCP of SW Florida (2013 Supplemental) PGM YR Funds: 2012	24,458	-	24,458								2,000	2,000	2,000	2,000	2,000	10,000	24,458
451 several	Legal Aid (2013 Supplemental) PGM YR Funds: 2012	72,552	-	72,552						2,000	2,000	2,000	2,000	2,000			10,000	72,552
459 several	Boys & Girls Club (2013 Supplemental) PGM YR Funds: 2011 & 2012	183,236	-	183,236								10,000					10,000	183,236
465 several	Big Cypress (2013 Supplemental) PGM YR Funds: 2004	74,718	-	74,718										72,000			72,000	74,718
n/a	Balance - Unprogrammed Funds PGM YR Funds: 2001,2002,2003	148,725	-	148,725													-	148,725
n/a	Balance - Unprogrammed Funds PGM YR Funds: 2005,2006,2007,2008	645,426	-	645,426													-	645,426
n/a	Balance - Unprogrammed Funds PGM YR Funds: 2009,2010,2011,2012	294,505	-	294,505													-	294,505
452 33289.2.3	Immokalee CRA-IBDC PGM YR Funds: 2013	115,000	-	115,000												115,000	115,000	115,000
453 33289.2.2	Goodwill Industries-Microenterprise PGM YR Funds: 2013	52,588	-	52,588						5,000	5,000	4,000	5,000				19,000	52,588
458 33289.2.1.1	City of Naples - Intersection Project PGM YR Funds: 2013	30,959	-	30,959								2,500					2,500	30,959
466 33289.2.1.2	City of Naples - Project: TBD PGM YR Funds: 2013	49,500	-	49,500											49,500		49,500	49,500
460 33289.2.6	CCHA - Electrical Replacement Project PGM YR Funds: 2013	385,000	-	385,000									200,000		180,000		380,000	385,000
461 33289.2.4	Salvation Army - Land Acquisition PGM YR Funds: 2013	-	-	-													-	-
462 33289.1	CDBG 2013 Planning & Administration PGM YR Funds: 2013	386,689	-	386,689					90,536	23,059	23,059	23,059	23,059	23,059	23,059	23,059	251,949	296,153

CDBG (WO) WORKOUT PLAN

FY13-14 ALLOCATION PROJECTS HIGHLIGHTED IN BLUE

Grantee: Collier County
 Updated: 4/7/2014

1,144,227

CDBG Workout Plan 2013-14
 Funds Projected (Scheduled) / Funds Drawn (Actual)

by: October 1, 2014

Activity Number wbs #	Activity Name PGM YR (Program Year Funds)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
		Original Funded OR Blc Amt	Amount Drawn as of 9/30/2013	Balance as of 10/1/2013	Drawdown October 2013	Drawdown November 2013	Drawdown December 2013	Drawdown January 2014	Drawdown February 2014	Drawdown March 2014	Drawdown April 2014	Drawdown May 2014	Drawdown June 2014	Drawdown July 2014	Drawdown August 2014	Drawdown Sept 2014	Total Projected Expenditures	Total Undrawn Balance
					\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual	\$ Scheduled \$ Actual
464 33289.3	CDBG 2013 Fair Housing PGM YR Funds: 2013	2,000	-	2,000									2,000				2,000	2,000
467 33289.2.5	Habitat for Humanity - Faith Landing-Infrastructu PGM YR Funds: 2013	500,000	-	500,000									150,000				150,000	500,000
xxx 33289.2.x	CASL - Acquisition 2013 PGM YR Funds: 2013	321,138	-	321,138									321,138				321,138	321,138
xxx 33289.4.1	(PD) CON Goodlette & 5th Avenue PGM YR Funds: 2013	1,500	-	1,500													-	1,500
xxx 33289.4.2	(PD) CON Goodlette & Central Avenue PGM YR Funds: 2013	1,500	-	1,500													-	1,500
xxx 33289.4.3	(PD) Boys & Girls Club of CC-Design and Permits PGM YR Funds: 2013	1,500	-	1,500													-	1,500
xxx 33289.4.4	(PD) Goodwill Industries-Microenterprise PGM YR Funds: 2013	1,000	-	1,000													-	1,000
xxx 33289.4.5	(PD) Immokalee CRA-IBDC PGM YR Funds: 2013	1,000	-	1,000													-	1,000
xxx 33289.4.6	(PD) Salvation Army-Land Acquisition PGM YR Funds: 2013	6,000	-	6,000													-	6,000
xxx 33289.4.7	(PD) United Cerebral Palsy of SW Fl PGM YR Funds: 2013	1,000	-	1,000													-	1,000
xxx 33289.4.8	(PD) Legal Aid Service of Collier County PGM YR Funds: 2013	1,000	-	1,000													-	1,000
xxx 33289.4.9	(PD) Habitat - Faith Landing Infrastructure PGM YR Funds: 2013	8,000	-	8,000													-	8,000
xxx 33289.4.10	(PD) BCHC - Site Improvements-Hatchers PGM YR Funds: 2013	4,500	-	4,500													-	4,500
xxx 33289.4.11	(PD) CCHA-Electrical Replacement PGM YR Funds: 2013	8,000	-	8,000													-	8,000
xxx	Balance - Unprogrammed Funds PGM YR Funds: 2013	55,571	-	55,571													-	55,571
TOTALS:		7,998,565	1,326,851	6,671,714														
Scheduled Expenditures					162,014	697,840	-	259,143	293,327	854,166	479,954	326,004	966,655	37,678	326,559	151,059	4,554,399	4,652,033
Actual Expenditures					162,014	697,840	-	259,143	293,326	607,359	-	-	-	-	-	-	2,019,682	
*Refer to tab 3 PR56 IDIS report (Current Timeliness Report)	LOC			(18)	6,509,700	5,811,860	5,811,860	5,552,717	5,259,390	4,405,224	3,925,270	3,599,266	2,632,611	2,594,933	2,268,374	2,117,315		(18)
	Balance			6,671,714	6,509,700	5,811,860	5,811,860	5,552,717	5,259,391	4,652,032	4,652,032	4,652,032	4,652,032	4,652,032	4,652,032	4,652,032		97,634
	Current Grant			1,933,445										1,751,866				
FY 2013-14 No. B-13-UC-120016																		2,092,307
	Ratio of Balance to Grant			3.45	3.37	3.01	3.01	2.87	2.72	2.28	2.03	1.86	1.36	1.34	1.17	1.10		0.05
					3.37	3.01	3.01	2.87	2.72	2.41	2.41	2.41	2.41	2.41	2.41	2.41		

(1) Total Original Grant Funded Amount OR previous YR carry forward amount.
 (2) Total CDBG Funds Disbursed to date.
 (3) Total Current Expenditures to be Disbursed
 (13) Total Projected Expenditures to be disbursed by: August 2nd (totals from columns 4 through 13 or 14 through 28)
 (13) The estimates associated with the items labelled "Reprogram" will be confirmed/modified once projects are selected
 (16) Total expenditures, Projected and Actual disbursements.
 (17) Total amount of "undrawn" funds, balance in LOC system at end of FY.
 (18) This amount is the sum of "total undrawn funds" at end of last FY plus current year's grant (allocation).
 (28) This column represents the amount of draw expected by the timeliness test date. Since much of this is not yet programmed, more specific draw date estimates cannot be given

Current CDBG Timeliness Report
 Grantee : COLLIER COUNTY, FL

PGM YEAR	PGM YEAR START DATE	TIMELINESS TEST DATE	CDBG GRANT AMT	--- LETTER OF CREDIT BALANCE ---		DRAW RATIO		MINIMUM DISBURSEMENT TO MEET TEST	
				UNADJUSTED	ADJUSTED FOR PI	UNADJ	ADJ	UNADJUSTED	ADJUSTED
2012	10-01-12	08-02-13	2,004,496.00	5,308,207.78	5,308,207.78	2.65	2.65		
2013	10-01-13	08-02-14	1,933,445.00	4,652,677.70	4,652,677.70	2.41	2.41	1,752,510	1,752,510