



U. S. Department of Housing and Urban Development
Jacksonville Field Office
CPD Division, 4HD
Charles Bennett Federal Building
400 West Bay Street, Suite 1015
Jacksonville, Florida 32202-4410

February 2, 2010

Mr. David Greene
City Manager,
City Hall
P.O. Box 2277
Winter Haven, FL 33883

Dear Mr. Greene:

**SUBJECT: Annual Community Assessment
Community Development Block Grant Program
Program Year 2008 - October 1, 2008 through September 30, 2009
City of Winter Haven**

This Office is required to make an annual determination that the City of Winter Haven is in compliance with the Housing & Community Development Act of 1974 and the National Affordable Housing Act and the applicable statutes. The Annual Community Assessment is an evaluation of the City's progress in meeting the statutory goals of providing decent housing in a suitable living environment and expanding economic opportunities which are also indentified as objectives in the City's Consolidated Plan.

We have recently completed our Annual Community Assessment for the City of Winter Haven for the program year October 1, 2008 to September 30, 2009. To accomplish this assessment, we reviewed the Consolidated Annual Performance Evaluation Report (CAPER) received December 30, 2009; the Annual Action Plan (AP) submitted in August 2009 and the Consolidated Plan (Con Plan) submitted in 2005. We have determined the City's overall progress and capacity continues to be satisfactory. This determination is based upon the information available to this Office and does not reflect a comprehensive evaluation of specific activities. A copy of the Assessment Summary is enclosed for your convenience.

A copy of Winter Haven's CAPER was forwarded to the staff of Fair Housing and Equal Opportunity (FHEO) for their review. If FHEO has comments they will be provided them under separate cover.

Pursuant to 24 CFR § 91.525 if you disagree with the enclosed Annual Community Assessment you may submit comments and or justification of your contrasting views to this office within 30 days of receipt of this letter. If we do not receive comments within the 30 day time frame this report will be considered final and should be made available to the public.

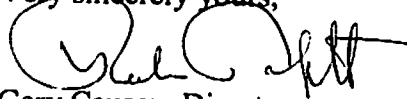
HUD's mission is to increase homeownership, support community development and increase access to affordable housing free from discrimination.

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We hope the summary will provide a basis for working together to continue to achieve your housing and community development goals. We also wish to congratulate the City on their accomplishments during the past year and we look forward to working with you over the next year. In the meantime, if you have any questions or immediate concerns, please contact me or Sherry Norton your Community Planning and Development Representative, by phone at (904) 208-6117 or by E-mail at Sherry.K.Norton@hud.gov.

Very sincerely yours,



for Gary Causey, Director
Community Planning and Development
Division, 4HD

Cc: Nancy Hurley,
Grants Manager
Polk County
PO Box 9005, Drawer HS04
Bartow, FL 33831

ANNUAL COMMUNITY ASSESSMENT SUMMARY
City Of Winter Haven
Program Year: October 1, 2008 to September 30, 2009

Community Development Block Grant (CDBG) Program

PART I: SUMMARY OF CONSOLIDATED PLAN/ACTION PLAN REVIEW AND ASSESSMENT

The City's Consolidated Plan, submitted in 2005, for the program years 2005-2010. The Consolidated Plan identified the City's needs, prioritized the needs and established 5-year strategic goals directly related to community development activities, using CDBG, SHIP and other sources of funding to meet the needs and goals.

The 2008-2009 Annual Action Plan submitted in August 2008 outlined the full scope of non-housing community development priorities for the program year. The goals and activities were consistent with the Consolidated Plan.

The 2008-2009 Consolidated Annual Performance Evaluation Report (CAPER) was received by the Department on December 30, 2009. The CAPER is designed to provide residents and the Department useful and timely information on the goals and progress towards meeting the goals of housing and community development project activities funded in the program year and through the applicable Consolidated Plan. The CAPER is a standalone document which must meet the Citizen Participation requirements. Therefore; we strongly recommend that the City provide a detailed description of the five and one year goals and the status of meeting the stated goals in future CAPERs. The CAPER submitted documented the one year goals and accomplishments however it did not reiterate the 5 year goals or the City's progress in meeting the 5 year goals. The staff provided supplemental information which allowed the Department to determine the City's compliance with the statutory goals at 24 CFR §91.520. In the future this information must be included in the CAPER that is made available to the public.

PART II: SUMMARY OF PERFORMANCE

A combination of CDBG and other federal, state, public, and private funds have been used to achieve desired community development objectives. The accomplishments cited within this summary are those implemented either wholly or partially with CDBG funds.

The City received CDBG a grant of \$269,372 for the 2008 Program Year. The CAPER reflects expenditures of \$465,856 during the program year. The funds were primarily expended in the public improvements in the T Avenue area; the Winter Haven Recreational Center and for public service activities. 100% of the funds were expended on activities to benefit low and moderate income persons.

One of the tools that the Department uses to evaluate grantees performance is to conduct a financial review of the City's obligated and expenditure of CDBG funding. Under the provisions of 24 CFR §570.902 of the CDBG regulations, a grantee is considered to meet timeliness criteria, if 60 days prior to the end of the grantee's program year, the balance in its line-of-credit does not exceed 1.5 times its annual grant amount. On July 31, 2009 Winter Haven had 1.24 times its annual grant amount on hand and therefore met the provision of the regulations. We congratulate the City on this accomplishment. To ensure compliance with the timeliness requirements throughout the CDBG program year, we utilize a straight-line projection of this formula for each month. Using this straight line formula the City's unexpended funds ration on January 28, 2010 is 1.6 which is within the straight line formula. The City needs to expended \$28,384 by July 31, 2010 in order to meet the 2010 timeliness requirement.

Community Development Block Grant Recovery (CDBG-R)

The American Recovery and Reinvestment Act of 2009 (Recovery Act), signed into law on February 17, 2009, awarded the City of Winter Haven \$73,147 to carry out eligible programs under CDBG on an expedited basis, to stimulate the local economy and increase jobs. The City processed and the Department approved an amendment to the 2008 Action Plan to implement the CDBG-R funding.

PART III: HUD EVALUATION AND CONCLUSIONS

Overall Evaluation

The proficiency of the City's implementation of the CDBG program is substantiated by the absence of programmatic findings and continuing to meet or exceed the Consolidated Plan goals and objectives. Quality programs and services have consistently been delivered to citizens while remaining within HUD expenditures and commitment rate requirements. In conclusion, we have determined that the City's overall performance is satisfactory.

Capacity Findings

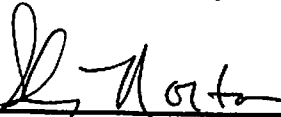

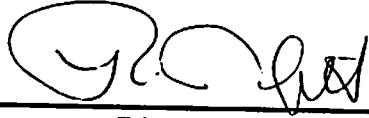
Based on our review of review of the available information pertaining to Winter Haven CDBG program during the past year, the following determinations have been made:

1. During the past year, Winter Haven has carried out its programs substantially as described in its Consolidated Plan;

2. The Consolidated Plan Submission as implemented complies with the Housing and Community Development Act and other applicable laws and regulations; and
3. Winter Haven has the continuing capacity to carry out the approved programs in a timely manner.

PART IV: SIGNATURES

Report Prepared By:

		2/2/10
Sherry Norton	Community Planning & Development Representative	Date
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		2/2/10
Reuben Padgett	Program Manager	Date
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		2/2/10
Gary Causey <i>For</i>	Director	Date