

# Louisiana Office of Community Development, Disaster Recovery Unit

## Pre-award Evaluation of Management and Oversight of Funds

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## Introduction

On February 3, 2022, the Department of Housing and Urban Development (HUD) issued Docket Number FR-6303-N-01 (Consolidated Notice) for the disasters occurring in 2020. This document demonstrates management's capacity for the State of Louisiana in the implementation of recovery plans. The Louisiana Office of Community Development (LOCD) is the designated agency for all State of Louisiana Disaster Recovery and Mitigation grants issued by the Housing and Urban Development (HUD).

Today, LOCD manages eight HUD grants with an average annual budget of over \$350 million per year and has over 16 years of prior experience in managing HUD funds. LOCD has existing systems and procedures, as well as formally established monitoring strategies that encompass crosscutting regulatory requirements including HUD program rules and regulations, civil rights, environmental, labor standards, fair housing, citizen participation and recordkeeping. The CDBG-DR program will leverage these existing resources and adapt them to the requirements of this Consolidated Notice and related guidance.

LOCD will manage grant funds responsibly, efficiently and transparently. The State has the financial management systems, policies, procedures and practices necessary to uphold fiscal responsibility as detailed in this Implementation Plan.

## Capacity Assessment

The Governor of Louisiana has designated the Division of Administration, Louisiana Office of Community Development, Disaster Recovery Unit (LOCD) as the lead agency responsible for implementation of all CDBG-DR and CDBG-MIT awards. Program administration will be led under the direction of the LOCD Executive Director who will report directly to the Commissioner of the Division of Administration for the State of Louisiana or his designee(s).

The LOCD Executive Director or his designee(s) will oversee daily operations of the program, including applicant intake and eligibility, contract management, policy and procedure, public information, and reporting. They will also oversee compliance and monitoring, financial management, and oversight of the HUD line of credit, including management of the Disaster Recovery Grant Reporting (DRGR) system and timely expenditures.

## Timeline and Milestones

The state is familiar with 2 CFR 200.343 – 345 which describes the closeout process and the Period of Performance deadlines. We know how to manage expectations and set up controls to ensure all actions and required work to complete the grant is completed timely. All contracts and awards contain deadlines to ensure timely completion and allowing enough time for the state to manage the close out process with HUD.

The state is anxious to address the unmet needs of its citizens that were affected by the many 2020 disasters and have already issued Request for Proposals to assist with the recovery. One of these is the

“Emergency RFP Building/Construction Management Selected Services”. The other is the “Program Management Selected Services”. In the Scope of the Services, the selected bidder will be required to provide intake services, including call center services, case management service, customer service, document retrieval and collection, data processing, sharing, and reporting. These services are similar to the very successful Restore Louisiana Homeowner Assistance Program used to help recovery from the 2016 Floods.

## Staffing

LOCD currently has over 116 full time positions to manage the eight current HUD grants and the upcoming LDZ B-21-DZ-22-0001 grant. Currently, we have twenty-six vacancies of which applications for fifteen are in the hiring process and should be filled within the next 30 – 60 days. LOCD does not anticipate any delays in the recovery process resulting from any vacancies due to the depth and experience of the existing staff. LOCD will manage its staffing to ensure that all grants have adequate resources, including staffing, to fulfill its mission as outlined in the Action Plan.

In the Consolidated Notice, HUD requested information regarding specific staffing needs, including:

- Case management in proportion to the applicant population - The project managers for each section will be responsible to ensure the sufficient case managers are available to adequately support the applicant population. The state has already issued the “Program Management Selected Services” Request for Proposal. In the Scope of the Services, the selected bidder will be required to provide intake services, including call center services, case management services, customer service, document retrieval and collection, data processing, sharing, and reporting. These services are similar to the very successful Restore Louisiana Housing Assistance Program used to help recovery from the 2016 Floods and will provide the scalability needed to ensure adequate support based on applicant population. Preliminary budgets indicate that case managers will be expected to handle 320 cases each during the life of the program. The successful proposer for the Program Manager Selected Services RFP will be responsible for maintaining the ratio of case managers of the applicant population. See attached **Appendix M** “Program Staffing Budget”.
- Program managers for Housing, Economic Revitalization and Infrastructure have been identified in the Organizational chart below
- LOCD has depth to its organizational structure with 63% of current staff have over 5 years of CDBG – DR experience and 45% have over 15 years of CDBG – DR experience.
- Internal auditor- The grantee’s internal auditor is independent; that function is provided by Division of Administration’s (DOA) Internal Audit Section, which reports to the Commissioner of the Division of Administration.
- Technical assistance for personnel not yet employed as well as grantees will be provided by LOCD’s Program, Compliance and Financial staff as needed. The state may contract with Subject Matter Experts or other Technical Assistance Providers, should sufficient demand for technical assistance warrant. For LOCD employees, both existing and new, TA will be available by in-house subject matter experts as well as formal training including COSCDA training as needed.

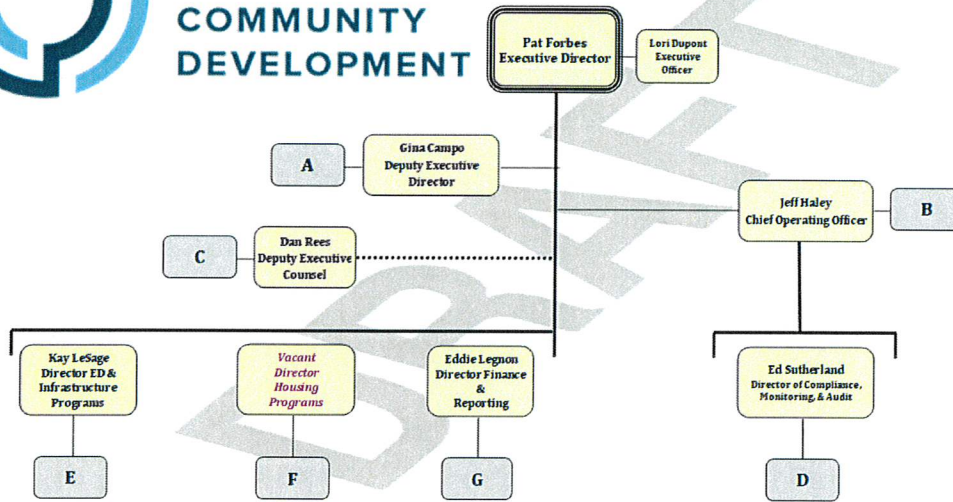
Below is a DRAFT Organizational Chart for LOCD along with a table that clearly indicates which personnel or organizational unit will be responsible for each of the Financial Management and Grant Compliance

Certification Requirements identified in the Consolidated Notice. Once all vacancies are filled, an updated Organization Chart will be forward to HUD for review.

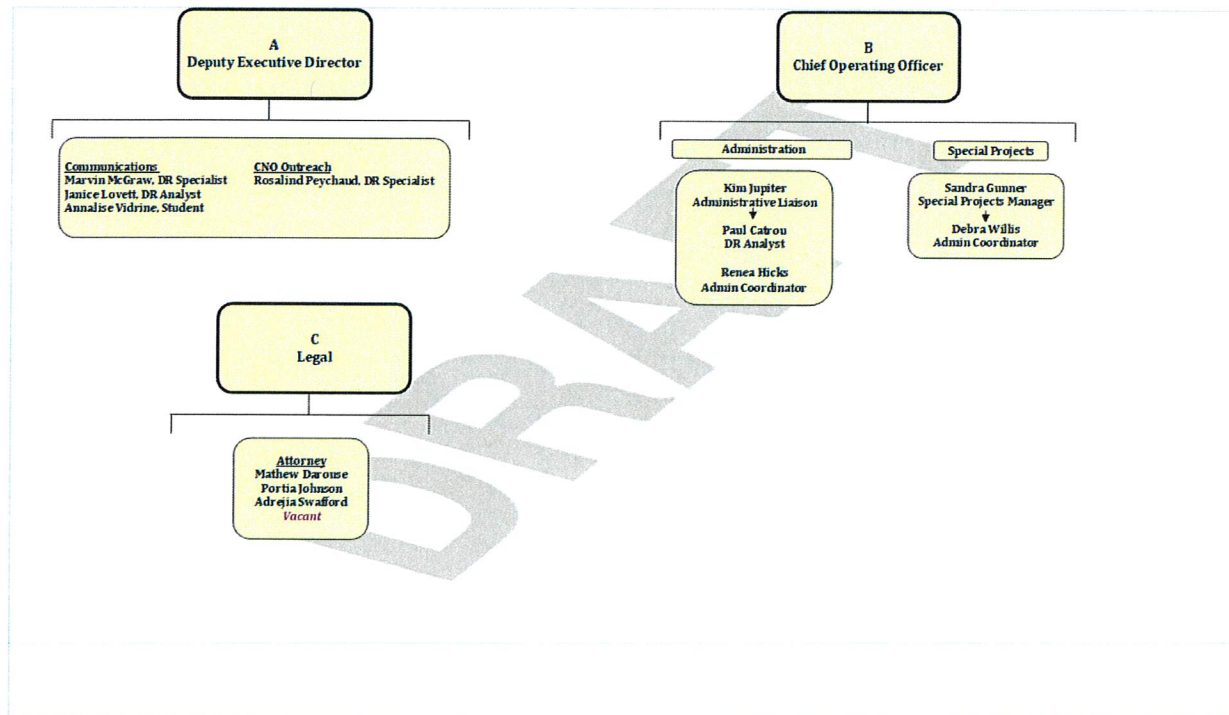
Function	Responsible Party
TA Website Management	The Responsible party for both CDBG-DR and CDBG-MIT will be the Deputy Executive Director and may be reached at 225-219-9600
Economic Revitalization Infrastructure	The Responsible party for both CDBG-DR and CDBG-MIT will be the Director ED & Infrastructure Programs and may be contacted at 225-219-9600
Contract Management Financial Management Timely Expenditures Procurement	The Responsible party for both CDBG-DR and CDBG-MIT will be the Director of Finance and Reporting and may be contacted at 225-219-9600
Case Management Housing	The responsible party for both CDBG-DR and CDBG-MIT will be the Director of Housing. In the absence of the Director of Housing, the contact person will be the Chief Operating Officer and may be reached at 225-219-9600.
Detection of Fraud, Waste and Abuse DOB Analysis Environmental Compliance Fair Housing Compliance Monitoring and Compliance Section 3 Implementation	The Responsible party for both CDBG-DR and CDBG-MIT will be the Director of Compliance, Monitoring & Audit and may be contacted at 225-219-9600
Internal Auditor	The Internal Auditor an independent function provided by the Division of Administration which reports to the Commissioner of the Division of Administration. The contact person will be the Internal Auditor and may be reached at 225-342-2900



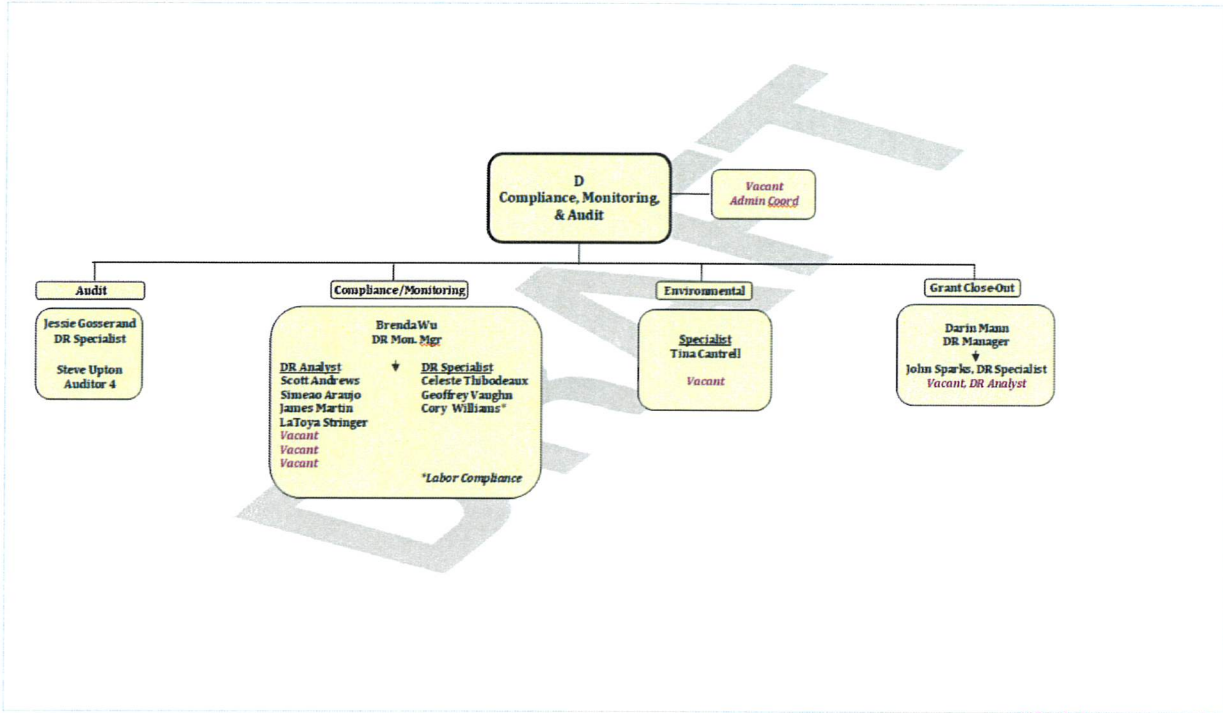
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Office of  
**COMMUNITY**  
**DEVELOPMENT**



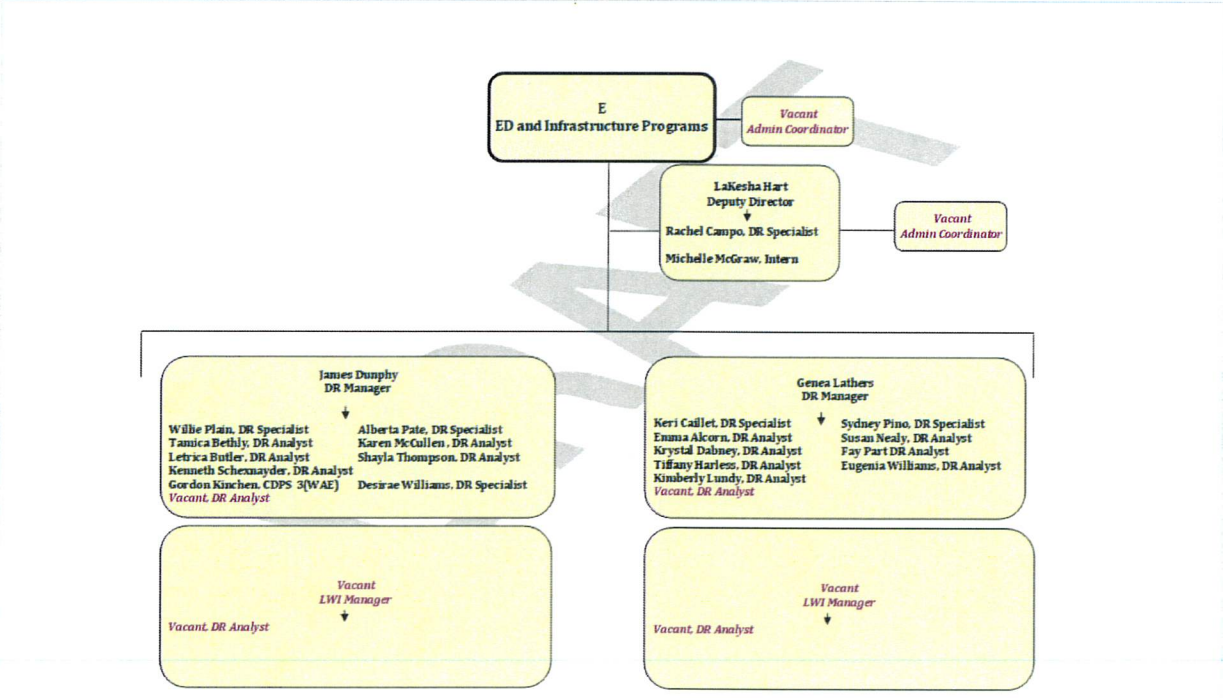
\*\*Purple denotes vacant position



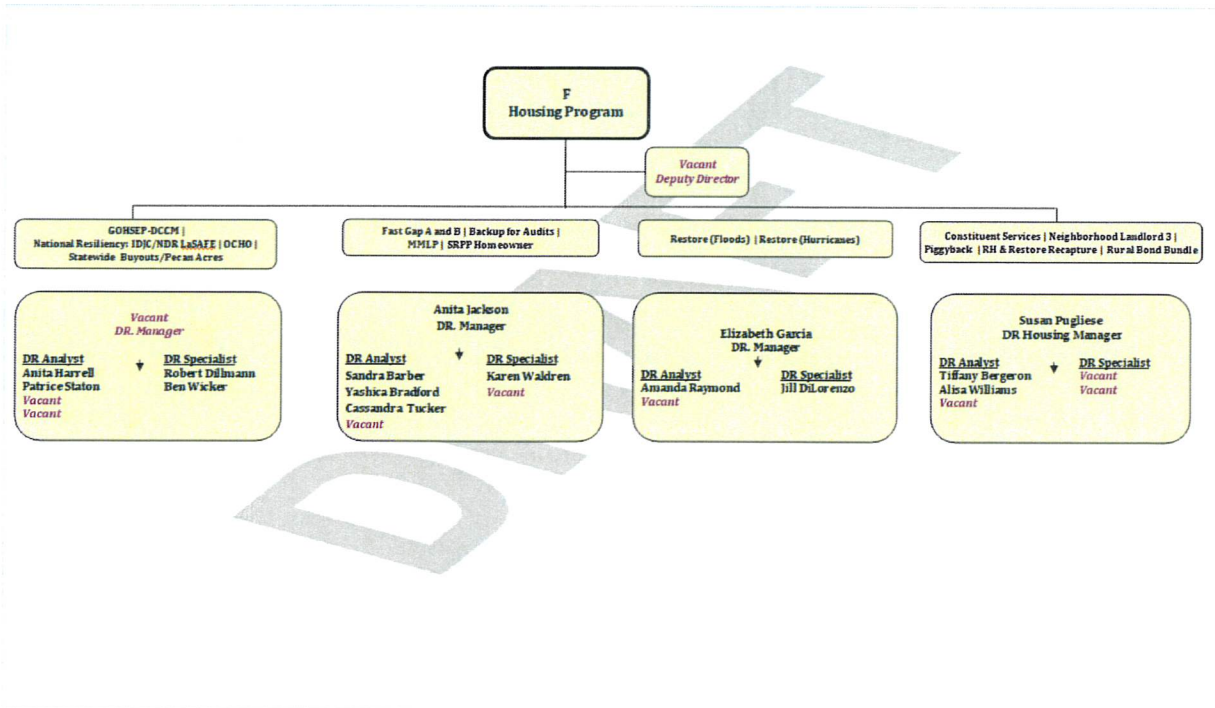
\*\*Purple denotes vacant position



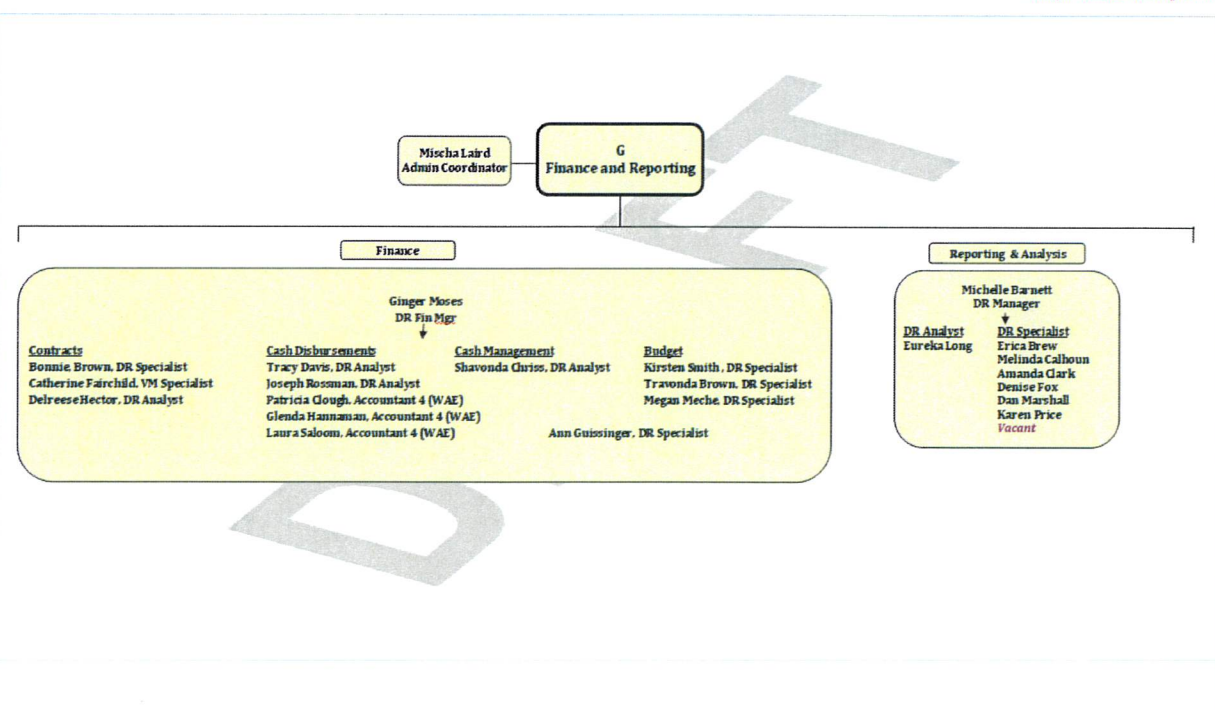
\*\*Purple denotes vacant position



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\*\*Purple denotes vacant position

## Internal and Interagency Coordination

The state will ensure effective communication between different agencies throughout state government as it manages this grant. Currently, the state has a several interagency agreements with state agencies including but not limited to the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), Louisiana Department of Environmental Quality (LDEQ), Louisiana Department of Health (LDH), Coastal Protection and Restoration Authority (CPRA)

In preparation of this grant, the state has met with the LA Division of Historic Preservation and the LA Division of Archaeology on multiple occasions to discuss the Homeowner Recovery Federally-Assisted Program as it relates to Section 106 Reviews. Based on those discussions, LOCD will review program activities in accordance with the 2016 LA Statewide FEMA PA (Programmatic Agreement Among the Federal Emergency Management Agency, The Louisiana State Historic Preservation Officer, The Governor's Office of Homeland Security and Emergency Preparedness, and Participating Tribes,) and HUD Addendum. All reviews when required as set forth in the programmatic agreement will be performed by or under the direct supervision of an individual who meets the SOI Professional Qualification Standard for history, architectural history and/or historic architecture.

For grantees and subrecipients, the state will either manage the individual programs with its existing staff or it may rely on one of its many cooperate endeavor agreements (CEA) with its partners such as the Louisiana Housing Corporation or the Louisiana Land Trust or others.

Effective communication will be communicated through measures including:

- a. Periodic scheduled meetings;
- b. Technical assistance sessions with agencies, grantees and subrecipients when either requested by those parties or on the state's own initiative when it deems appropriate on specific issues or new developments affecting programs.
- c. Broadcast communications (i.e. Listserve) via email on issues, news or developments affecting programs.
- d. Providing response on applications, draw requests, supporting documents, or other submissions by agencies, grantees and subrecipients;
- e. Verbal and written communications inherent in monitoring functions conducted by the state.

The scheduling and frequency of any of the above measures will vary depending upon the nature of the activities being conducted, the complexity of transactions associated with the activity, and size of the budget associated with the activity. For example, see **Appendix L** for a copy of the weekly meeting Agenda for the Restore Homeowner Assistance Program.

## Part A. Financial Management Controls

LOCD certifies proficiency in financial management using established financial systems and internal controls. The sections below provide further description of existing risk management measures.

Additional information can be found in the “Financial Management and Grant Compliance Certification Requirements for State Grantees 2020 Disasters” (**Appendix A**), which answers specific questions about financial standards and which personnel or unit are responsible for each item. The completed guide and accompanying procedures will be submitted to HUD in addition to the Action Plan and this Implementation Plan.

### Single Audit and Annual Financial Statement

The State of Louisiana is in full compliance with Single Audit requirements. The Louisiana Legislative Auditor (LLA) is required by statute (RS 24.513) to audit the financial statements of individual state agencies, departments, boards, and commissions that are included within the State’s Comprehensive Annual Financial Report (CAFR).

Independence is maintained and thereby reduces the chance for conflict since the powers of government of the state are divided into three separate branches; legislative, executive, and judicial. While LOCD comes under the Executive Branch of the government, the LLA comes under the Legislative Branch.

Below are the most recent single audit and consolidated annual financial report (CAFR). Although the reports do not identify any material weaknesses, deficiencies, or concerns regarding CDBG, CDBG-DR, or CDBG-MIT funds, the report noted two outstanding findings and the states response to those findings.

The State of Louisiana Single Audit Report for the Year Ended June 30, 2020, is available electronically at: [Single Audit as of June 30, 2020](#)

The state of Louisiana Comprehensive Annual Financial Report for the Fiscal Year Ended June 30, 2021, is available electronically at: [CAFR as of June 30, 2021](#)

#### 1. Findings

The Louisiana Single Audit Report for the Year Ended June 30, 2020, contained two reportable findings for the Louisiana Office of Community Development, Disaster Recovery Unit relating to Catalogue of Federal Domestic Assistance (CFDA) 14.228 Community Development Block Grants/State’s Program and Non-Entitlement Grants in Hawaii. Both are considered material weaknesses in internal control.

The findings are as follows:

- 2020-010 - Inadequate Grant Recovery of Homeowner Assistance Program Awards (Schedule C, page 34); and
- 2020-011- Inadequate Recovery of Small Rental Property Program Loans (Schedule C, page 36).

## 2. State Responses

LOCD prepared a Management Corrective Action Plan for each of the findings presented in the Single Audit, describing how these issues are being addressed. A Corrective Action Plan for each of the findings can be found within the Single Audit:

- 2020-010 - Inadequate Grant Recovery of Homeowner Assistance Program Awards (Appendix B-21); and
- 2020-011 - Inadequate Recovery of Small Rental Property Program Loans (Appendix B-23).

LOCD monitors its Subrecipients for Single Audit compliance with 2 CFR 200, Subpart F. Subrecipients who expend \$750,000 or more in federal funds during the fiscal year are required to submit their Single Audit reports to the LLA as required by state audit law (RS 24:513) within six months after the end of the entities' fiscal year. The LLA reviews the audits for completeness and performs ongoing monitoring activities to ensure the competency of the CPA firms that performs these audits. Subrecipients who fail to submit their reports timely will be placed on the LLA Non-Compliant List and are prohibited from receiving any additional state funding until they are removed from the list. LOCD will obtain copies of the Single Audit reports and review them for material weaknesses and findings or concerns. LOCD will also request any corrective action plans (CAPs) and issue management decisions regarding CAPs where findings have been reported involving federal funding provided by LOCD.

### Guide for Review of Financial Management

The completed "Financial Management and Grant Compliance Certification Requirements for State Grantees 2020 Disasters" is included as **Appendix A** and references the Financial and Administrative Policies and Procedures Manual (**Appendix B**), the Financial Fidelity Insurance Certification (**Appendix C**), and the LOCD Subrecipient Monitoring Procedures Audit Requirements (**Appendix D**).

### Financial Management

LOCD maintains multiple accounting and grants management systems to support a multi-functional grants management program. In combination, these systems provide accurate, current and complete disclosure of the financial status of each CDBG supported activity, according to the terms and conditions of the Grant Award Agreement. These systems are audit-tested and confirmed to meet all Federal and State requirements.

Recipient accounting records are supported by source documentation stored in compliance with record-keeping requirements. LOCD has financial record-keeping practices to retain source documentation for accounting records that will be applied to the CDBG-DR program to ensure records adequately identify the source and application of CDBG-DR funds provided and maintain source documentation to evidence the costs incurred and dates of expenditure.

LOCD also works with several State Agencies who provide financial support to ensure the adequacy and accuracy of the financial statements. These agencies include, but are not limited to:

- Office of Financial Support Services - which provides comprehensive accounting services that include financial reporting and analysis, as well as budget development and preparation for the Division of Administration and various offices and agencies within the Executive Department; and
- Office of Statewide Reporting and Accounting Policy - which provides and maintains a uniform system of accounting for all state agencies, to provide accurate and timely financial information through the Comprehensive Annual Financial Report of Louisiana and to provide for the maximum recovery of federal funds through the Statewide Cost Allocation Plan.

For our grantees, required financial controls and accounting system requirements are contained in Chapter 5 of the State of Louisiana LOCD Disaster Recovery CDBG Grant Administrative Manual, and the LOCD Financial and Administrative Policies and Procedures Manual (**See Appendix B**). The entire Grant Administrative Manual can be viewed at [Grantee Admin Manual](#)

### Internal Controls

LOCD has existing policies and procedures meeting financial management requirements including: applicable regulations and requirements, financial accountability and records, authorized signatures for payments and checks, requests for payments, bank accounts and checks, escrow accounts, administrative costs, property management, and audit requirements. The department has cash management procedures in place that minimize the elapsed time between receipt and disbursement of CDBG funds. A copy of the current Financial and Administrative Policies and Procedures Manual can be found in **Appendix B**.

The organizational structure encompasses risk management measures that establish clear lines of authority and approval, segregation of duties, separation of key processes and authorization and secure access to financial resources. The program financial division is overseen by the Director of Finance and Reporting with sub-divisions for Financial Management and Reporting. A full organizational chart can be found in the Staffing section of this plan.

In summary, the Department's internal controls are set up for responsible management of CDBG-DR funds and support the prevention of fraud, waste and abuse to ensure that:

- No person involved in the program decision-making obtains financial benefit;

- No single-point sign-off of significant transactions;
- Separate recordkeeping for disaster recovery funds versus general accounting operations;
- Reconciliation of accounts performed by employees not responsible for handling payroll preparation and issuance of paychecks;
- Hiring procedures match required financial skill sets to position descriptions;
- Policies and procedures are in place to maintain effective control and accountability for all cash, real and personal property and other assets;
- Policies and procedures are in place for controlled access to assets and sensitive documents; and
- Reasonable measures are in place to safeguard protected personally identifiable information.

## Part B. Procurement Processes

For Procurement, the state follows the Louisiana Revised Statutes 39, Chapter 17 titled Louisiana Procurement Code. (See **Appendix E**). These policies of the state align with the requirements set forth under 2 CFR 200.317-327 ensuring fair and open competition. A cross walk between the federal regulatory requirement and its counterpart under the Louisiana Procurement Code can be found in **Appendix F**.

All other subrecipients are required to follow 2 CFR Part 200.317 through Part 200.327, which can be found in the Grant Administrative Manual at [Grantee Admin Manual](#) Section 6 titled “Procurement Methods and Contractual Requirements”.

The State shall comply with the procurement requirements of 24 CFR 570.489(g) and evaluate the cost or price of the product or service. Additionally, if LOCD designates as the administering agency chooses to provide funding to another State agency, LOCD will require the other state agency to follow the procurement policies of this agency. A copy of the Procurement Policy can be found in **Appendix F**.

The responsible party for procurement and contract management will be the LOCD Finance and Reporting Director. The Contracts Specialist will be responsible for adhering to Louisiana state law regarding procurement as well as all State of Louisiana Division of Administration Office of State Procurement policies and procedures to ensure that the state’s contracting and purchasing activities are conducted in accordance with applicable law, regulation and policy. More information may be found at their website at <http://www.doa.la.gov/danPages/osp/Index.aspx>.

## Part C. Procedures for Prevention of Duplication of Benefits

In accordance with the Stafford Act, LOCD has established a Duplication of Benefits Policy, which can be found in the Grant Administrative Manual. A copy of the policy is attached as **Appendix G**. The policy identifies procedures, which allows for the following:

- Verify all sources of DR assistance received before committing funds or awarding assistance;
- Determine applicants unmet needs; and
- Ensuring beneficiaries enter into a signed agreement to repay any duplicative assistance

## Part D. Procedures to Determine Timely Expenditures

Grantees are required to spend funds within the statutory guidelines. LOCD establishes timelines within each agreement in order to meet requirements. Per grant requirements, penalties for failure to meet milestones will be included in agreements, which may result in a full or partial recapture of funds or a reduction in award amounts. LOCD has a proven strategy of employing representatives to focus specifically on assisting grantees with complying with CDBG regulations, determining and managing activity milestones, providing other technical assistance as needed and serving as a direct and constant communication avenue between LOCD and the grantee.

The Policy and Procedure to Determine Timely Expenditures can be viewed in **Appendix H** and the general process for payment approval is provided in the flow chart on page 10 of **Appendix B**.

In order to provide an appropriate level of management review, Reporting staff produce a monthly budget report for all grants. These budget reports are distributed to the LOCD leadership, to the State of Louisiana Joint Legislative Committee on the Budget and to the public via our website at <http://www.doa.la.gov/Pages/LOCD/Reports.aspx>. The budget reports track expenditures and provide visibility on unobligated and unexpended amounts on a monthly basis.

Management team have periodic reviews with senior management to review the progress of the programs including current spend rates, projected start and end dates, and input from program managers on anticipated milestones. Each program is assessed during these reviews to identify whether it is progressing on target or if some programmatic intervention is required. As part of this review, each program is assessed to identify dollars that will need to be reallocated and status updates on those programs ready to begin closeout procedures. The Director of Finance and Reporting Management is responsible for ensuring that monthly budget reports are produced and that the Quarterly Performance Reports are created timely.

The policy for Program Income can be found in Chapter 15 of the Finance and Administrative Policies and Procedures Manual (**Appendix B**) starting on page 20. The procedures contain the appropriate steps to correctly identify record, distribute and report Program Income. All program income will be returned to LOCD, unless otherwise stated in written agreement with recipients.

## Part E. Procedures to Maintain a Comprehensive Website

The LOCD has a “Procedures to Maintain a Comprehensive Website Policy” (see **Appendix I**) to maintain a comprehensive website dedicated to the state of Louisiana’s CDBG-DR and CDBG-MIT programs and related activities associated with these funds. The link for the State’s website can be found at <http://www.doa.la.gov/Pages/LOCD/Index.aspx>.

On the website, participants can find information concerning all HUD CDBG-DR and CDBG-MIT action plans, expenditure reports and performance reports. In addition, a link to the Office of State Procurement

is on the website to provide procurement procedures and all contracts that will be paid using CDBG-DR and CDBG-MIT funds.

LOCD also has a Language Access Plan for Limited English Proficiency Persons (LAP) that can be found on LOCD's website at <https://www.doa.la.gov/oa/ocd/resources/> . The LAP defines the actions taken to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency. The LAP was created to reduce language barriers that can preclude meaningful access by LEP persons to LOCD Programs.

## **Part F. Procedures to Detect Fraud, Waste and Abuse of Funds**

The process of detecting any fraud, waste and abuse of CDBG-DR and CDBG-MIT funds is an ongoing process and constantly monitored. Each program will be responsible for incorporating Anti-Fraud Waste and Abuse (AFWA) into its operating procedures and policies. All incidents of fraud, waste and abuse are reported to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).

For the recovery of the 2020 and 2021, the State will use the Restore Louisiana Homeowner Assistance Program (RLHAP '20-21'). This is modeled after the RLHAP program from the 2016 floods and will use the same established procedures for verifying the accuracy of information provided by program applicants, vendors, and sub-recipients. In addition, the RLHAP '20-21' has an established website that educates its applicants on the risk of contractor and other potentially fraudulent activity that can occur in communities recovering from a disaster. See **Appendix J** titled "top 10 tips to Remember when Hiring a Contractor" and [RLHAP '20-21' Website](#) .

The State uses numerous resources to ensure AFWA, including LOCD, the state Division of Administration's Internal Auditor, the Office of Legislative Auditors, the Office of Inspector General and the Office of Finance and Support Services.

LOCD is responsible for the day-to-day administration of the CDBG-DR and CDBG-MIT programs. Program and Finance staff review all requests for payment and accompanying invoices to ensure costs are reasonable and within the scope of the activity funded prior to sending the request to OFSS for payment. LOCD has developed a Grantee Administrative Manual for the CDBG-DR funds, which is provided to all grantees and subrecipients. An electronic copy can be found at [Grantee Admin Manual](#) . The purpose of the manual is to assure that all CDBG-DR funds are properly managed and accounted for, and to assure that grantees and subrecipients administer their projects and programs in accordance with all CDBG-DR rules and regulations. Additionally, LOCD provides training to grantees and subrecipients on how to use the Grantee Administrative Manual.

The Louisiana Ethics Administration Program governs all of the state's policies regarding Code of Conduct and Conflicts of interest. See their website at <https://ethics.la.gov/default.aspx>. In addition, all CDBG-DR

and CDBG-MIT funding is accompanied with a Cooperative Endeavor Agreement (CEA), which includes a Conflict of Interest section, which contains the following language:

Covenant Against Contingent Fees and Conflicts of Interest and Louisiana Code of Government Ethics

Grantee shall warrant that no person or other organization has been employed or retained to solicit or secure this Agreement upon contract or understanding for a commission, percentage, brokerage, or contingent fee. For breach or violation of this warranty, the OCD shall have the right to annul this Agreement without liability

or, in its discretion, to deduct from this Agreement or otherwise recover the full amount of such commission, percentage, brokerage or contingent fee, or to seek such other remedies as legally may be available.

No member, officer, or employee of Grantee, or agents, consultant, member of the governing body of Grantee or the locality in which the Project is situated, or other public official who exercises or has exercised any functions or responsibilities with respect to this Agreement during his or her tenure, shall have any interest, direct or indirect, in any contract or subcontract, or the proceeds thereof, for work to be performed in connection with the project, the Project or in any activity or benefit, which is part of this Agreement.

Grantee shall also comply with the current Louisiana Code of Governmental Ethics as applicable. Grantee acknowledges that Chapter 15 of Title 42 of the Louisiana Revised Statutes (R.S. 42:1101 et. seq., Code of Governmental Ethics) applies to Grantee in the performance of services called for in this Agreement. Grantee agrees to immediately notify the state if potential violations of the Code of Governmental Ethics arise at any time during the term of this Agreement.

Finally, there is monitoring of all grantees and subrecipients. This involves both desktop and onsite monitoring. **Appendix K** contains LOCD's Long-Term Compliance and Monitoring Plan, which outlines how grantees, subrecipients, and their respective contractors are monitored, and the methodology employed for the prioritization of reviews.

### Internal Auditing

The grantee's internal auditor is part of the DOA's Internal Audit Section, which reports to the Commissioner of the Division of Administration. The DOA Internal Audit Section is responsible for monitoring of and the frequency of all DOA agencies including agencies that administer CDBG-DR and CDBG-MIT funds.

## Technical Assistance

Technical assistance to subgrantees and subrecipients, including units of general local government will be provided by LOCD's Program, Compliance, Program and Financial staff as needed. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The state may contract with Subject Matter Experts or other Technical Assistance Providers, should sufficient demand for technical assistance warrant.

For LOCD employees, both existing and new, TA will be available by in-house subject matter experts as well as formal training including COSCDA training as needed.