



**City of Lake Charles CDBG-DR
Implementation Plan
Louisiana Severe Storms, Tornadoes,
and Flooding | 4606-DR-LA**

July 26, 2024

Version III

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Table 1. Version History

Version Number	Date	Summary of Changes
1	August 25, 2023	Original
2	April 29, 2024	Added additional staff members and details on staff responsibilities and qualifications to lead the CDBG-DR programs
3	July 26, 2024	Additional staff members were added to the staff organizational chart

1.0 Introduction

On March 22, 2022, HUD allocated nearly \$3 billion in CDBG-DR funds appropriated by the Disaster Relief Supplemental Appropriations Act of 2022 for major disasters occurring in 2020 and 2021, including FEMA DR-4606-LA, the May 2021 Floods. This Allocation Announcement Notice identified grant requirements for these funds, including requirements in HUD's CDBG-DR Consolidated Notice Appendix B, and some amendments to the Consolidated Notice that apply to CDBG-DR grants for disasters occurring in 2020 and 2021. The Consolidated Notice, as amended by this Allocation Announcement Notice, includes waivers and alternative requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities. This notice also includes a modification to the February 3, 2022 Notice (87 FR 6364) that announced CDBG-DR grants for disasters occurring in 2020. Under this modification, the City of Lake Charles received a direct allocation of \$10,776,000. The Catalog of Federal Domestic Assistance (CFDA) numbers for the disaster recovery grants under this notice are 14.218 and 14.228. On January 18, 2023, the City was notified of an additional direct HUD allocation in the amount of \$ 7,042,000 through Notice 88 FR 6368 meaning the City was awarded a total of \$17,818,000 in direct CDBG-DR and MIT allocation attributable to this specific disaster.

The Community Development Department as the lead agency responsible for the development and administration of the City's Consolidated Plan will serve as the lead agency with respect to the CDBG-DR funds. The Department is responsible for carrying out the financial and programmatic responsibilities of the CDBG-DR program. The Federal Register Notice allocating the CDBG-DR funds requires that the City prepare an Implementation Plan to demonstrate sufficient capacity to manage the funds and the associated risks. This plan will describe the capacity of the City of Lake Charles Department of Community Development to conduct the recovery and how it will address any capacity gaps.

2.0 Capacity Assessment

2.1 Identify Lead Principal Agency

The City of Lake Charles Department of Community Development is the lead City agency for the implementation and management of the CDBG-DR funds. The Department will be leveraging the \$17,818,000 CDBG-DR funds to address gaps in Affordable Housing, Public Facilities, and Economic Revitalization. The Community Development Department offers a variety of programs that contribute to neighborhood revitalization, economic development and improved community facilities and services within the City limits of Lake Charles. The City receives Community Development Block Grant and HOME Investment Partnership Program funding annually through HUD to principally benefit low-to-moderate income persons.

2.2 Hierarchy of Program Accountability

Mr. Mark Tizano is the Director of the City of Lake Charles Department of Community Development, which is the lead City agency for the implementation and management of the CDBG-DR funds. Mr. Tizano reports directly to the Mayor and manages a staff of nine people in the Department of Community Development. He has 14 years of project management experience over HUD Entitlement and CDBG-DR grants to include oversight of compliance requirements such as environmental reviews. Please refer to the organization chart in this plan.

2.3 Description of Capacity Assessment

As the program reaches certain critical milestones, the Department will iteratively reevaluate and re-assess staffing needs to determine when to transition certain positions, if additional hires are necessary, or whether to augment staff with a consultant or contract positions. The Department issued an RFP and secured a consultant to assist with the implementation of the programs to provide additional capacity to the Department staff. Additionally, the developers and subrecipients that will be carrying out the projects identified in the Action Plan have been vetted according to a risk assessment developed by the City to ensure they have the experience and capacity to compliantly implement the projects well within the grant performance period.

The sub-recipients and contractors selected for the projects in the Action Plan have been vetted for potential risks and their capacity. They are known entities and have a history of working with grant funds and understand the requirements and timelines that accompany grant funds. The City works proactively to set up subrecipients and contractors for success. The Department of Community Development will host a workshop for the sub-recipients, developers and contractors before any work on the projects begins to refresh them on CDBG-DR requirements, set expectations for monitoring, and explain the City's process for invoicing. Attending a workshop is mandatory and this requirements is included in sub-recipient and developer agreements. Workshop participants will receive leave behind tools to assist them with compliance. The first workshop is scheduled for February 26, 2024. The City has documented Monitoring Policies and Procedures on file that staff will follow when monitoring the projects. The Department staff will provide ongoing support and technical assistance to the City's CDBG-DR project partners in addition to conducting regular monitoring.

2.4 Timeline & Method of Addressing Capacity Gaps

The Department will follow the process outlined below to ensure milestones are being met.

- The Department of Community Development assessed staff capacity, systems, and processes and issued a Professional Services Request for Proposals (RFP) on 9/2/2022 to select a program manager to assist them with the allocation.
- The Department selected a consultant from this competitive procurement process on 10/2/2022.

- Upon contract award, the selected consultant began working with the Department to gather unmet needs data.
- The consultant assisted the Department with conducting a public participation process to gather input from the community.
- The unmet needs data, public input, and feedback from City stakeholders informed a list of selected projects to be included in the Action Plan.
- The contractors and subrecipients associated with the projects were vetted for risks and capacity. Goals and budgets for each project were agreed upon by the City and the contractor or subrecipient.
- The Department submitted a Public Action Plan in DRGR on 4/28/23; responded to Requests for Information (RFIs) by HUD and resubmitted in DRGR on 8/11/2023.
- The Department and its consultant are currently working through milestones and timelines for each project.
- The Department and its consultant are reviewing existing policies and procedures; revising and developing new policies and procedures; and developing job aides for implementation.
- The Department's consultant will complete environmental reviews and assist with the procurement process. As of this version of the Implementation Plan, HUD has approved the environmental reviews and the City has received Authorizations to Use Grant Funds (AUGFs) on all of the Action Plan projects except for Woodring Phase II affordable rental housing project (submitted to HUD on 10/17/23) and the Hope Center project (City will submit to HUD in March 2024). The City's consultant prepared the environmental reviews for Mark Tizano's review and then Mr. Tizano submitted them to HUD through HEROS. The consultant coordinated with the Department of Community Development on the publication of Notices of Finding of No Significant Impact and Notices of Intent to Request a Release of Funds and the public comment periods.
- The Department and its consultant will ensure that any changes to the projects are reflected in an Action Plan amendment.

The Department and its consultant will submit quarterly reports in DRGR and monitor the sub-recipients and contractors through closeout.

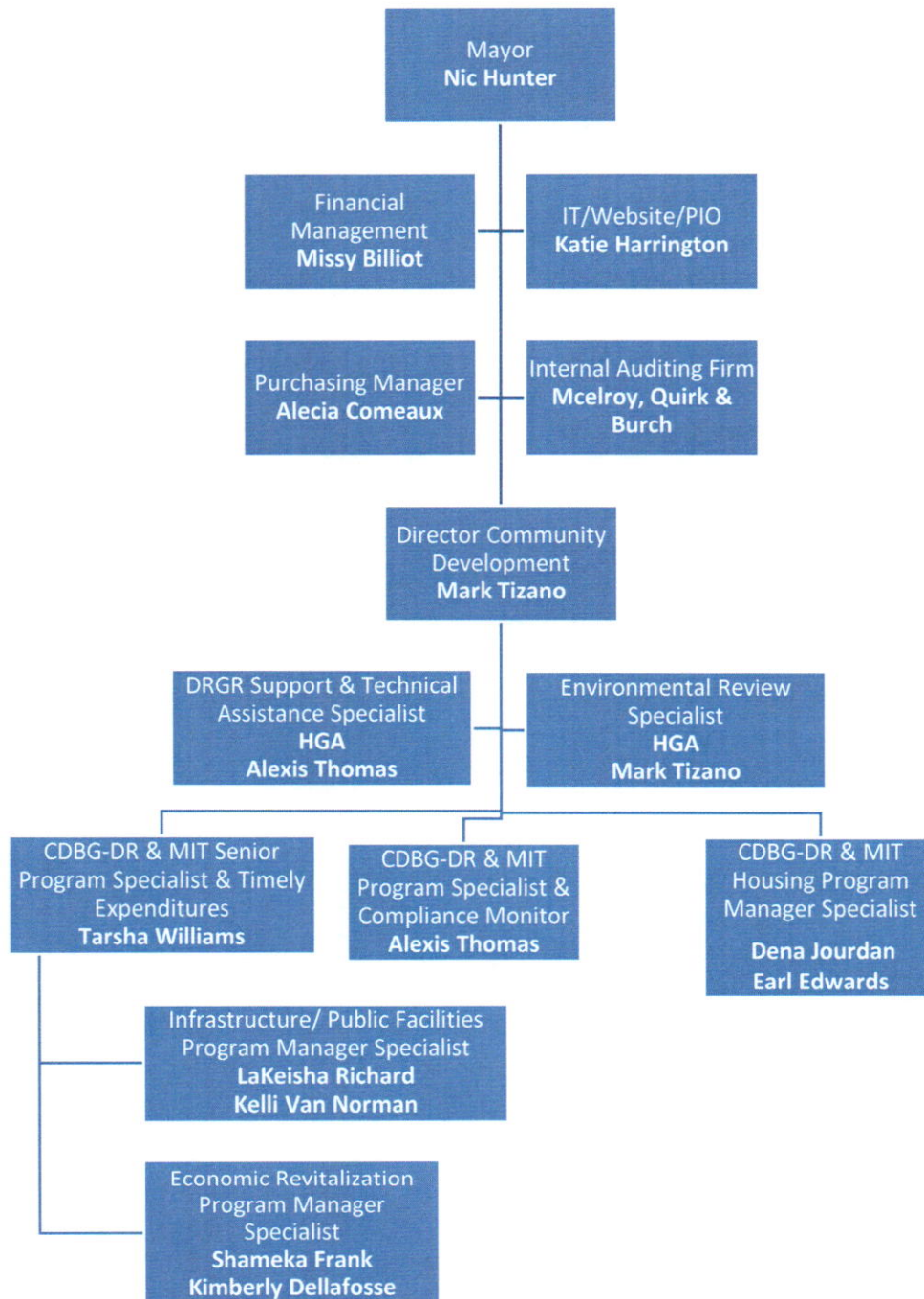
2.5 Open CDBG-DR Findings and Corrective Actions

The City of Lake Charles does not have any open findings or corrective actions that need to be addressed regarding its HOME or annual CDBG funds. This is the first time the City has been a direct recipient of CDBG-DR grant funds.

3.0 Staffing

3.1 Organizational Chart

The current organizational chart may be updated throughout the term of the grant. Although the City of Lake Charles Department of Community Development has existing staff resources, it will also leverage resources available through its contracted consulting firm. The Department's staffing model will be flexible to accommodate future needs and workload.



The Department of Community Development has identified the various other departments that will be responsible for various functions of the CDBG-DR Program:

City Department	Responsibility
Community Development Department	<p>The Responsible Entity to HUD in the receipt of the CDBG-DR funds who leads interdepartmental coordination efforts in the delivery of the recovery programs.</p> <p>The Department has assigned existing staff members with roles including Compliance Monitor (covering duplicate of benefit [DOB] compliance and subrecipient monitoring) and Timely Expenditures as shown in the organizational chart on the previous page. As noted in the organizational chart, the Department has also secured a contracted consultant firm to fill in gaps in staffing needs.</p>
Information Technology/Public Information Officer	Maintains website and supports technology needs of the City departments; provides comprehensive communication strategy relative to program activities
Finance Department	Work with Community Development in reviewing invoices, accounts payable/receivables, requesting drawdowns from Treasury, reviewing DRGR reporting, ensuring procurement meets 2CFR 200, State, and local requirements
Legal Department	Provides legal advice to City departments to ensure that grant and loan documents/terms are lawfully enforceable and ensure compliance with the Federal grant, City, and State standards. Review all subrecipient and contractor agreements/legal instruments and their terms for compliance.
Planning Department	Work with CDBG-DR proposed projects to ensure conformance with zoning, permitting, and comprehensive planning
Public Works Department	Work specifically with public facility projects on the planning and construction to ensure that design and construction meet specific industry standards and requirements
Procurement	Responsible for solicitations issued for professional services and construction contracts to ensure compliance with City policies and State and Federal regulations
Parish Office of Homeland Security and Emergency Preparedness	Calcasieu Parish Office of Homeland Security and Emergency Preparedness is responsible for the preparation before an event occurs, the responding and managing of an event, and the supporting and rebuilding after an event for the entire Parish to include the City of Lake Charles.

3.2 Financial Management and Compliance Certification Personnel

The City of Lake Charles Department of Community Development has a Compliance Monitor (Alexis Thomas) within the Department (see organizational chart) that will continuously monitor its CDBG-DR sub-recipients and will determine the areas to be monitored, the number of monitoring visits, and their frequency. Ms. Thomas has been working with federal grants for nearly two year. Specifically, she has served as a compliance monitor over the City’s entitlement grants since October 2022. Ms. Thomas stays current on HUD’s policies regarding grant compliance by attending webinars and training courses. Additionally, she attended a CDBG-DR compliance boot camp in February that is hosted by the State Office of Community Development.

The Department’s contracted consulting firm will assist the Compliance Monitor with sub-recipient monitoring. All entities administering CDBG-DR funding will be monitored not less than once during the contract period; either on-site or by desk reviews. The monitoring will address program compliance with contract provisions, including eligibility, related to the disaster, national objectives, records retention, financial management, timely expenditures, Section 504/ADA compliance, Fair Housing, Anti-Fraud/Waste/Abuse, Conflict of Interest and Federal Funding Accountability and Transparency Act (FFATA), Broadband accessibility, Minority and Women Owned Business Enterprises (MBE/WBE) and Section 3 goals outreach and attainment, environmental review compliance, Davis-Bacon, URA processes if applicable, cost reasonableness review, imposition of restrictive affordability periods and use covenants/ deeds, reporting, and duplication of benefits analysis. The Department will administer all facets of these programs in accordance with all applicable CDBG-DR regulations and will use HUD CDBG-DR checklists included in the HUD CPD Monitoring Handbook as a guide to ensure compliance, and follow the City’s CDBG-DR Policy and Procedures Manual and the City’s Monitoring of CDBG-DR Sub-recipients and Development Activities Policy.

The City of Lake Charles grant managers, to include Alexis Thomas, Tarsha Williams, and Dena Jourdan, have the skills, knowledge, and experience to effectively oversee federal grant awards; they are required to attend training related to the grants they manage. They work with the City’s Finance Department regularly. Grant expenses are reviewed and approved by appropriate program and grant managers to ensure that only eligible allowable costs in accordance with 2 CFR Part 200 Subpart E - Cost Principles are charged to federal awards.

3.3 Key Staffing Roles and Descriptions

Staff	% Time Dedicated to CDBG-DR	Position Responsibilities
Mark Tizano, Community Development Department Director and Environmental Review Specialist	50% with remaining spent on entitlement programs	Duties include serving as liaison to administration and partner agencies; overseeing overall department functions; serving as primary HUD contact; facilitating community engagement initiatives to include creating a community engagement plan for

		COLC OCD; approving timesheets; approving project selection; directing and approving planning efforts; and serving as liaison to Council members and community leaders. Conducts environmental reviews or oversees the work of an environmental consultant and ensures compliance and clearance on HUD funded projects.
Tarsha Williams, Program Specialist and Timely Expenditures	50% with remaining spent on entitlement programs	Duties include compliance monitoring over the City's entitlement grants and will oversee the work of consultants hired to provide compliance monitoring for the CDBG-DR program. Her responsibilities include timely expenditures and disbursement of grant funds.
Alexis Thomas, Program Specialist and Compliance Monitor	50% with remaining spent on entitlement programs	Duties include compliance monitoring over the City's entitlement grants and will oversee the work of consultants hired to provide compliance monitoring for the CDBG-DR program. Also works in DRGR and reviews the consultant's work in DRGR.
Dena Jourdan, Housing Program Manager Specialist	50% with remaining spent on entitlement programs	Deliver housing-related programs associated with the CDBG-DR funds including, but not limited to, multi-family affordable rental developments. Generate, review, and process written reports, documentation, logs, correspondence, public notices, and informational material. Engage with Department staff, other governmental offices, contractors, community partners, and developers. Conduct informational meetings with contractors, consultants, private and nonprofit organizations, government employees, and general public. Apply and contribute to policies and procedures to administer CDBG-DR programs and funding. Participate in programmatic audits with internal and external auditors, as may be required.
Earl Edwards, Housing Specialist	15%	Earl Edwards serves as the City's Small Business Opportunity Coordinator and also assists with the Department's housing programs. He will

		pair with Dena Jourdan on the housing programs.
Kelli Van Norman, Assistant City Engineer	25%	Assistant City Engineer serves as a technical resource to the Community Development Department on infrastructure and public facility projects.
Lakeisha Richard, Facilities Infrastructure/Public Program Manager Specialist	100%	Lakeisha Richard is the first of two new hires for the COLC who was brought in specifically to work on CDBG-DR Infrastructure/Public Facilities projects. She will pair with Kelly Van Norman on said projects.
Kimberly Dellafosse, Assistant City Administrator	15%	Assistant City Administrator serves as a technical resource to the Community Development Department on economic development projects.
Shameka Frank Economic Revitalization Program Manager Specialist	100%	Shameka Frank is the second of two new hires for the COLC who was brought in specifically to work on CDBG-DR Infrastructure/Public Facilities projects. She will pair with Kimberly Dellafosse on said projects.

3.3.1 Case Management

As the City of Lake Charles action plan for implementing this specific allocation of direct CDBG-DR funds does not include nor does it plan to include projects and programs that benefit individuals, there is no need for case management.

3.3.2 Program Managers

The City of Lake Charles has hired program managers through a consulting firm that will exclusively work on economic revitalization, infrastructure/public facilities, and multifamily housing undertakings. In addition, current Department staff will oversee the consultant firm's economic revitalization, infrastructure/public facilities, and multifamily program managers to ensure cross-cutting federal statutory compliance, monitoring, financial management, and reporting as well as any other tasks and functions relevant to the full grant lifecycle are being met. The consultant firm's program managers will provide direct assistance to the sub-recipients and contractors.

3.3.3 Staff Experience

Mark Tizano, Director, has 28 years of experience in managing Housing, Economic Revitalization, and Infrastructure programs funded through HUD programs such as CDBG-DR, CDBG, and HOME, in addition to programs funded by FEMA. He has successfully led the Department of Community Development since 2021. Senior Program Specialist Tarsha Williams has been with the Department since 2021 and has been performing disaster recovery grant work for 18 years

specializing in housing recovery. Program Specialist Alexis Thomas joined the Community Development Department in 2022 to manage the CDBG-DR grant funding. She brings local Lake Charles housing experience to the team. Dena Jourdan joined the Department in 2015 and delivers housing-related programs associated with entitlement and the CDBG-DR funds including, but not limited to, multi-family affordable rental developments. She generates, reviews, and processes written reports, documentation, logs, correspondence, public notices, and informational material. She engages with Department staff, other governmental offices, contractors, community partners, and developers. She conduct informational meetings with contractors, consultants, private and nonprofit organizations, government employees, and general public. Apply and contribute to policies and procedures to administer CDBG-DR programs and funding. Participate in programmatic audits with internal and external auditors, as may be required.

Ernest Broussard works from Lake Charles City Hall and brings over 38 years of economic revitalization and disaster recovery experience. He previously served as the Executive Director of the Jefferson Davis Parish Economic Development Office; as Executive Director of the Cameron Parish Planning and Development Office; and as a City Planner for the City of Lake Charles. Ernest has been providing these services as a consultant to the City of Lake Charles since 2013.

3.3.4 Procurement & Contract Management

The program managers within the City's Community Development Department, Financial Department, and the Legal Department will be overseeing the procurement and contract management functions of the grant. The Department will follow the City's documented Contracts and Procurement Policy and Procedures Manual for Disaster and Emergency Grant Management.

3.3.5 Section 3

The City's Community Development Department staff will ensure that Section 3 Plans and Goals are current in its written and adopted practices and that where applicable, all activities triggering the applicability of Section 3 are followed to include good faith effort outreach to Section 3 eligible firms and individuals, report on outcomes in attaining goals, and document in the System of Record all good faith efforts and goal attainments made and reached. The Department's contracted consultant firm will support the Department with Section 3 compliance. Sub-recipients and developers will receive Section 3 compliance training at the mandatory workshops described in Section 2.3 of this Plan. Construction contractors will be made aware of Section 3 compliance during pre-construction meetings held after contract award and before construction commences.

3.3.6 Fair Housing Compliance

The Community Development Department staff implement and monitor Fair Housing compliance and provide technical assistance to sub-recipients as needed on policies and procedures. Actions taken to further Fair Housing in the City include but are not limited to:

- Partnering with Louisiana Balance of State Continuum of Care to ensure Fair Housing requirements are implemented.
- Fair Housing posters are posted in City Hall and distributed to all subrecipients.
- In 2005, the City approved the Lake Charles Fair Housing Ordinance, which aims to curb the potential negative effects of public policies on housing for protected classes and low-income residents.
- The City completed an Analysis of Impediments to Fair Housing in 2013 and is working on a new analysis to be completed in 2024.
- The State's 2020 Analysis of Impediments to Fair Housing Choice included data on the City of Lake Charles.
- Include Fair Housing in subrecipient agreements with housing developers. The subrecipient agreement template currently under review by the City's legal team is based on a HUD-approved template provided by the City's HUD Technical Assistance Provider and includes requirements for documenting compliance with the fair housing.
- Compliance with Fair Housing will be captured in subrecipient monitoring throughout the life of the project per the City's Subrecipient Monitoring Policies and Procedures document which references HUD checklists.
- Annually hosts a luncheon to celebrate Fair Housing, present a Fair Housing Champion Award, and lead training workshops.

3.3.7 Environmental Compliance

Mark Tizano, the Community Development Director, is experienced in conducting environmental reviews and ensures compliance and clearance on HUD funded projects in the City's CDBG entitlement program and will also do so for the City's CDBG-DR projects. The Department's competitively procured consultant firm will provide support for environmental reviews on the six proposed CDBG-DR projects in the Action Plan. The Community Development Director will be monitoring the consultant firm's work and signing off on their reviews as the Responsible Entity. Mr. Tizano stays up to date on changes in the HUD environmental review process, such as the new policy for addressing radon. Mr. Tizano's Community Development staff have HUD Exchange accounts and are increasing their understanding of the environmental review process by attending webinars and taking the training modules through the HUD Exchange Web-Based Instructional System for Environmental Review (WISER).

The City's consultant serves as the Environmental Officer who prepares the environmental review records including site visits, data collection and analysis, preparing letters for the City to send where consultation with other agencies may be necessary, facilitating publication of floodplain notices and FONSI/NOI-RROFs, and ERR file preparation. In accordance with its role as the Responsible Entity, the City is responsible for all inherently governmental functions including engaging in consultation with other agencies including tribes and the SHPO, quality control, signing off on the ERR and the impact determinations, signing as the Certifying Officer on FONSI-

RROFs and NOI-RROFs, assuming all legal responsibility as described on the 7015.5 (Request for Release of Funds) form, and ensuring no choice-limiting actions are taken until the Authority to Use Grant Funds (AUGF) is issued by HUD.

As previously stated in Section 2.4 of this Plan, as of the date of this version of the Implementation Plan, the City has received AUGFs from HUD for four of the six projects in the Action Plan.

3.4 Internal Auditor

The City has a third party conduct an audit annually. See the organizational chart in this document. This audit firm reports to the City Mayor. The City's fiscal year begins October 1st. The contracted firm audits the City of Lake Charles's compliance with the types of compliance requirements described in the OMB Compliance Supplement that could have a direct and material effect on each of the City's federal programs. The firm conducts their audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200 , Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). The latest single audit stated that the City was in compliance with the requirements surrounding its federal programs.

The City's third party auditor will include antifraud, waste, and abuse (AFWA) in his annual review of the CDBG-DR projects. All City employees, subrecipients, and contractors are responsible for the detection and prevention of fraud, waste, abuse, misappropriations, and other irregularities. Supervisors work with employees to ensure familiarity with the types of improprieties that might occur within their area of responsibility. The Community Development Director Mark Tizano and his designees have primary responsibility for investigation of all suspected fraudulent acts as defined in this policy. If the investigation substantiates those fraudulent activities occurred, the City Legal Department will be engaged. When applicable, reports will be issued to appropriately designated personnel and, if appropriate, Federal, or state agencies.

3.5 Technical Assistance & Filling Knowledge Gaps

The Department has readily accepted and receives weekly technical assistance through the HUD Community Compass Program from a HUD Technical Assistance Provider. All staff members of the Department of Community Development attend these meetings. The HUD Technical Assistance Engagement is for program launch and capacity building until the end of June 2024. Additionally, the Department has secured a consultant to provide additional technical assistance and training as needed. Through the HUD Community Compass Program and the procurement of a consultant, the Department of Community Development staff are receiving all technical assistance and training needed to ensure activities funded under the Action Plan are administered properly. The Department also has an established, positive relationship with the HUD local CPD office in New Orleans, LA, from whom they can receive additional guidance and resources.

The City and its consultant have had regular meetings with the Louisiana Housing Corporation (LHC) on the conduct of the three affordable rental projects, roles and responsibilities, and loan arrangements. The City and LHC are responsible entities for these three projects. The City and LHC will execute a memorandum of agreement outlining which entity is responsible for compliance monitoring to include Davis Bacon, Section 3, etc. The Louisiana State Office of Community Development (OCD) has also been an as-needed technical resource for the City. The City's Community Development team will be attending an in-person CDBG-DR Boot camp hosted by the State OCD on February 27, 2024.

Any new hires secured for the planned CDBG-DR projects will be trained by existing Department staff. New hires are required to attend ethics training and to review all Department policy documents. All Department staff participate in HUD webinars to stay current on changes in guidance and take advantage of online training opportunities through the HUD Exchange to include, but not limited to, the following:

- Training modules through the HUD Exchange Web-Based Instructional System for Environmental Review (WISER)
- Economic Revitalization Guide Overview Webinar
- DOB Analysis Worksheet Overview Webinar
- Advanced Strategies for CDBG-DR Compliance
- Prevention of Fraud, Waste, and Abuse
- CDBG-DR Problem Solving Clinics

3.6 Technical Assistance to Sub-grantees and Sub-recipients

The Department of Community Development has an open-door policy, meaning that the Department staff is always available to share their knowledge, templates, and tools with other City departments and subrecipients. In addition to sharing information from disaster recovery specific training, the Department will also continue to use the library and resources available on the HUD Exchange.

4.0 Internal and Interagency Coordination

4.1 Ensuring Effective Communication between City Departments

Effective communication between City departments is a focus within the City of Lake Charles for all projects. The City holds quarterly meetings with the Department heads. The Department of Community Development will schedule regular meetings with the City departments that will play a part in the proposed CDBG-DR funded projects to include Purchasing, Finance, Public Works, Legal Department, and the Public Information Officer, in addition to the contracted consulting firm that will be supporting tasks such as environmental reviews. Progress on projects will be presented by the Department of Community Development at the quarterly meetings held for City department heads.

4.2 Ensuring Effective Communication between Subrecipients

To facilitate project development and ensure that awarded projects stay on schedule for completion, the Department of Community Development will institute regular monthly meetings with each subrecipient or developer leading the proposed projects. The Department will also invite other relevant City departments as needed.

4.3 Ensuring Effective Communication between Local and Regional Planning Efforts

The City, including representatives from the Department of Community Development, meets regularly with Calcasieu Parish in person to discuss recovery goals. City and Parish staff discuss grant funds they have received and how they can collaborate to address unmet needs most effectively in the community through eligible projects. The proposed projects have been discussed at the public meetings and will be introduced at an upcoming City Council meeting. Progress on projects will be presented by the Department of Community Development at the quarterly meetings held for City department heads.

4.4 Consultation with Relevant Government Agencies

The City's Department of Community Development is in regular contact with the Calcasieu Parish Office of Homeland Security and Emergency Preparedness (OHSEP). The Parish OHSEP coordinates with the State Hazard Mitigation Officer (SHMO). The City Mayor hosts meetings with the State Department of Environmental Quality to discuss environmental issues with proposed project sites. The City currently has a contracted consultant firm to manage the administration of FEMA grant funds that the City was awarded and the City's Department of Community Development coordinates with this contracted firm on remaining unmet needs. The Department of Community Development also has an established relationship with the State Office of Community Development (OCD) and the Louisiana Housing Corporation.

5.0 Implementation Plan - Conclusion

5.1 Meeting Requirements in 87 FR 6277 III.A.2

This document and its contents meet all the requirements applicable rules, statutes, waivers, and alternative requirements prescribed in the notice. This implementation will be done through a robust, data-driven and grant compliant planning process with full iterative communication between the New Orleans HUD Community Planning and Development (CPD) Office and the City, adherence to the accepted Action Plan and any substantial or non-substantial Action Plan amendments, and projects/programs that shall implemented within the grant that meet said requirements. Oversight and compliance will occur at multiple levels of staff involvement from the Community Development Department Program Managers and Director, as well as the City's Mayor and Council. Review of compliance and outcomes reports will be conducted to substantiate that all requirements of 87 FR 6277 III.A.2 have been fully adhered to and met during the grant lifecycle.