



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

**April 26, 2023**



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# 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 (CDFA) 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 in 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

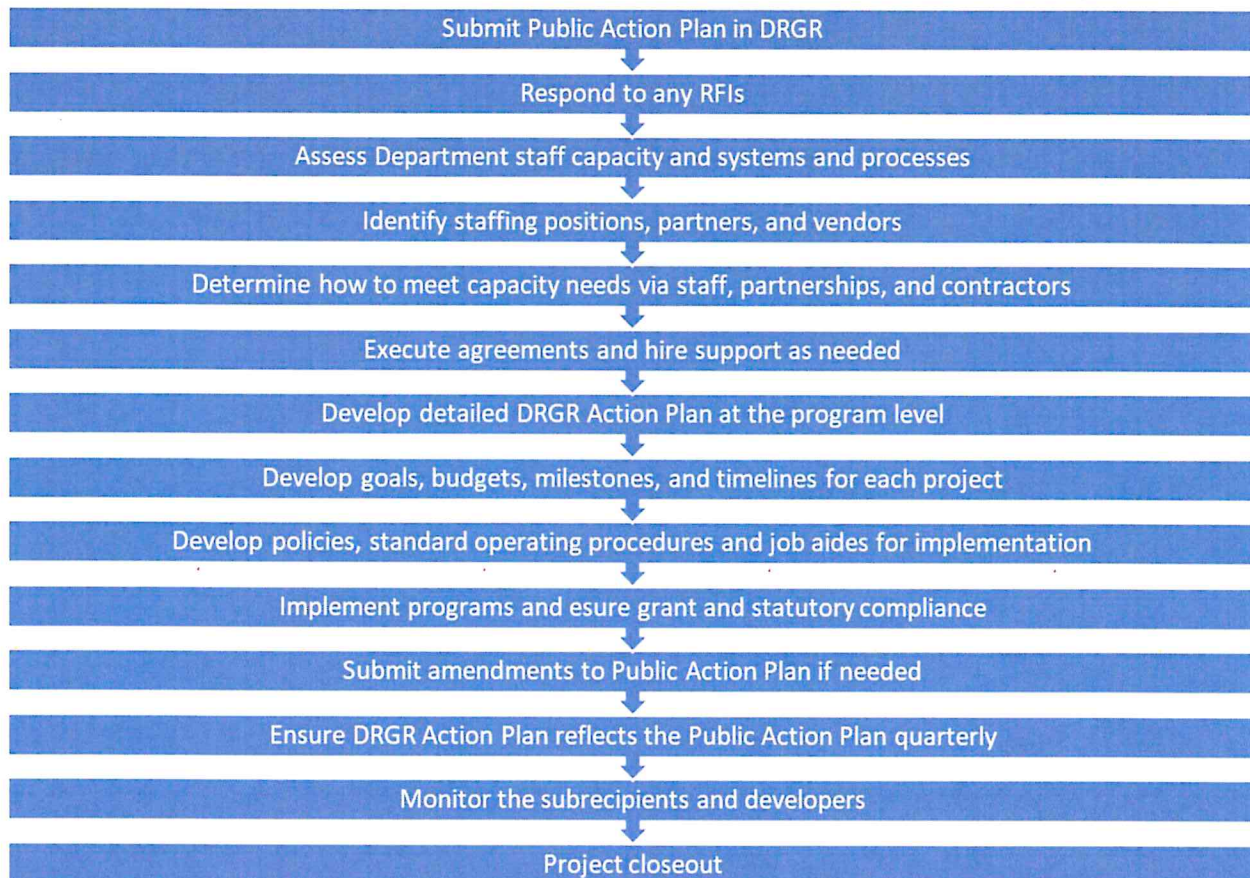
Mr. Mark Tizano is the Director of the City of Lake Charles Department of Community Development, which is the lead City agency for the implementation and management of the CDBG-DR funds. Mr. Tizano reports to Mayor Hunter's office. Please refer to the organization chart in this plan on page 5.

## 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 has issued an RFP to secure 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 to ensure they have the experience and capacity to compliantly implement the projects well within the grant performance period.

## 2.4 Timeline & Method of Addressing Capacity Gaps

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



## 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. The chart includes roles necessary to administer the grant that are not filled yet. Although the City of Lake Charles Department of Community Development has existing staff resources, it will also leverage resources available through its partners. Since the program activities have not yet been determined, the Department's staffing model will be flexible to accommodate future needs and workload.

The Department anticipates hiring the following positions directly or via a Contracted Consultant Firm:

- Environmental Review Specialist
- Public Facilities Program Manager
- Economic Revitalization Program Manager
- Housing Program Manager



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	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
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 will have in place a compliance officer within the Department that will continuously monitor its CDBG-DR subrecipients and will determine the areas to be monitored, the number of monitoring visits, and their frequency. 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/FFATA, Broadband accessibility, MBEWBE 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. HUD monitoring checklists for regular CDBG program activities will be adapted as needed to monitor CDBG-DR program activities.

The City of Lake Charles grant managers have the skills, knowledge, and experience to effectively oversee federal grant awards; they are required to attend training related to the grants they manage. 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

### 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 shall hire program managers that will exclusively work on economic revitalization and multifamily housing undertakings. This specific action plan does not include infrastructure projects. In addition, there will be staff providing support to the economic revitalization and multifamily program managers who will be subject matter experts in applicable cross-cutting federal statutory compliance, monitoring, financial management, and reporting as well as any other tasks and functions relevant to the full grant lifecycle.

### 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 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.

### 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. There will be a three phase review of each procurement process and contract award to ensure all processes meet federal, state, and local standards.

### 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.

### 3.3.6 Fair Housing Compliance

The Community Development Department staff implement and monitor Fair Housing compliance and provide technical assistance to subrecipients 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.
- Completed an Analysis of Impediments to Fair Housing.
- Include Fair Housing in subrecipient agreements.
- Annually hosts a luncheon to celebrate Fair Housing, present a Fair Housing Champion Award, and lead training workshops.

### 3.3.7 Environmental Compliance

The Community Development Director is experienced in conducting environmental reviews and ensures compliance and clearance on HUD funded projects. The Department intends to solicit contractor support for environmental reviews on the proposed CDBG-DR projects in the Action Plan. The Community Development Director will be monitoring the contractor's work and signing off on their reviews as the Responsible Entity.

### 3.4 Internal Auditor

The City has a third party conduct an audit annually. This audit firm reports to the City Mayor. The City's fiscal year begins October 1<sup>st</sup>. 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.

### 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 September 2023. 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.

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.

### 3.6 Technical Assistance to Subgrantees and Subrecipients

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, and the Public Information Officer, in addition to the contracted professional firm that will be supporting tasks such as environmental reviews.

### **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 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 most effectively address unmet needs 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.

## 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 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.