

INTERNAL AUDIT REPORT #2019-006
COMMUNITY DEVELOPMENT BLOCK GRANT - HURRICANE ISSAC
HUD DISASTER RECOVERY GRANT #B-13-US-22-0001
RELEASE DATE: AUGUST 21, 2019



Tara Hazelbaker, CPA
DIRECTOR OF INTERNAL AUDIT | JEFFERSON PARISH

INTERNAL AUDIT REPORT #2019-006
HUD DISASTER RECOVERY GRANT #B-13-US-22-0001
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OVERVIEW

BACKGROUND

The Jefferson Parish Department of Community Development administers the entitlement grants received by the United States Department of Housing and Urban Development (HUD). These grants include the Community Development Block Grant Program (CDBG), along with the HOME Investment Partnerships Program, and the Emergency Shelter Grant Program.

Hurricane Isaac, a Category 1 hurricane, made landfall in Louisiana in August of 2012 near the mouth of the Mississippi. Jefferson Parish was impacted with hurricane-force winds, significant rainfall, and flooding that overcame the drainage and sewerage infrastructure in place at the time. According to door-to-door inspections conducted by the Federal Emergency Management Agency (FEMA), an agency of the United States Department of Homeland Security, nearly 13,000 homes sustained damage as a result of Hurricane Isaac. The total estimate of such damage in Jefferson Parish was approximately \$224 million.

Jefferson Parish received a direct allocation of CDBG funds for Disaster Recovery (CDBG-DR) under Public Law 113-2 for \$16,453,000 for recovery efforts related to Hurricane Isaac. The allocation of funds was authorized at various times via five (5) different “rounds” of funding. In general, the parish has twenty-four (24) months to expend each round of funding; however, an extension can be requested. Rounds one (1) through three (3) have been expended as of the timing of this report, while rounds four (4) and five (5) are in process. See Attachment A to review the grant agreements for each round of funding.

One should note that according to the Federal Register, Vol. 80, No. 90 issued on May 11, 2015, “All funds under the Appropriations Act, including those subject to a waiver of the expenditure deadline, must be expended by September 30, 2022. Any grant funds that have not been disbursed by September 30, 2022, will be canceled and will no longer be available for disbursement to the grantee for obligation or expenditure of any purpose.”

Funding Round	Expenditure Deadline	Budget Amount	Expended Amount	Status
1	03/13/2016	\$ 338,595.00	\$ 338,595.00	Complete
2	05/13/2017	609,259.00	609,259.00	Complete
3	02/04/2018	1,468,376.00	1,468,376.00	Complete
4 ^a	09/30/2022	4,168,698.32	1,606,895.57	In Process
5 ^b	08/14/2019	9,868,071.68	1,534,048.45	In Process
TOTAL		\$16,453,000.00	\$5,557,174.02	← 33.8%

Jefferson Parish continues to implement an approved Action Plan under Public Law 113-2 to utilize the unexpended funds and carry out activities according to the approved Action Plan, which includes four (4) key areas of focus: Homeowner Assistance Program - Housing (HAP); Elevation Support Program - Housing (ESP); Sewerage Emergency Pump Out – Infrastructure (EPO); and Drainage Infrastructure.

^a An extension was granted for Round 4 changing the due date from 05/20/2018 to 09/30/2022.

^b An extension was requested for Round 5 to change the due date from 08/14/2019 to 09/30/2022; however, the extension was pending approval as of the timing of this report (08/19/2019).

For more details regarding the Action Plan, see Attachment B. See Attachment I for drawdowns (expended amounts) by quarter.

OBJECTIVES

The overarching objective of this review was to ensure compliance with HUD CDBG-DR requirements. Since this is the first time that the CDBG-DR program has been audited by the Department of Internal Audit, it is essential to establish a baseline understanding of the risks, opportunities, and challenges posed by the nature of the program and the environment in which it operates. To do so, Internal Audit will review a sufficient cross-section of CDBG-DR operations necessary to gain this understanding while addressing certain significant risks. In evaluating risk, the following factors were considered:

- Prior audit/monitoring findings from HUD and/or others,
- Inherent riskiness of a subject matter,
- Recent significant changes in operations, personnel, or operating results,
- Input from the Department of Community Development and Jefferson Parish Administration, and
- General factors related to processes and procedures and internal controls in place by the Jefferson Parish Department of Finance.

SCOPE

The Department of Internal Audit evaluated the current policies and procedures, and internal controls in place for effectiveness, adequacy, and efficiency of operations for the CDBG-DR processes utilized by the Jefferson Parish Department of Community Development. Internal Audit also reviewed the HUD monitoring report received on September 13, 2018, to ensure that all open recommendations have been implemented. See Attachment C for the referenced report.

On a transactional level, this audit focused on all drawdowns made after the last approximate fieldwork dates covered by the above referenced HUD monitoring report. The previous fieldwork date was July 18 and 19, 2018, thusly drawdowns made from July 1, 2018, through June 30, 2019, were examined. These drawdowns are a part of funding Rounds 4 and 5. Drawdowns for funding Rounds 1, 2, and 3 were not considered since related expenditures have been completed within the established deadlines.

Internal Audit retrieved the various grant award letters, and agreements, along with the approved Action Plan detailing the grant award activities. The CDBG-DR Policies and Procedures Manual was also obtained as well as select financial data from the parish's AS/400 Financial Management System, and the current staffing and organizational chart of the program. General knowledge of the parish's internal control structure was exercised and revisited throughout this audit.

The report covers only the areas as indicated in the Objectives and adheres to the Scope, as stated above.



FINDING #1

CRITERIA

The HUD monitoring report presented in a meeting on July 19, 2018, and received in written form by Jefferson Parish on September 13, 2018, recommended that the parish request an extension for Round 5 grant funds.

Excerpt from the HUD monitoring report, Page 3:

Overall Grant Progress

HUD staff reviewed overall progress of CDBG-DR program expenditures and assessed the Parish's capacity to implement the activities listed in their approved action plan. As of this monitoring visit, the Parish has five grant agreements totaling its total grant award and is fully budgeted at \$16,453,000. The Parish has disbursed \$4,023,125.57 or approximately 24% of its total allocation. The Parish has met its expenditure deadlines and was granted an extension for Round 4 of grant funds. HUD is concerned with the Parish's ability to meet its two-year expenditure deadline of August 2019 for its Round 5 grant agreement and recommends the Parish to request for an extension of these funds.

FINDING

As of the timing of this report (July 31, 2019), the Department of Community Development has not received an extension of the two-year expenditure deadline to expend Round 5 funds. The requested extension date is September 30, 2022; however, the due date remains August 14, 2019.

OBSERVATIONS

In a report presented at a meeting held on July 19, 2018, and received in written form by the parish on September 13, 2018, HUD expressed concern regarding the parish's ability to meet the two-year expenditure deadline for Round 5 of funding.

The first effort the parish made to request an extension was via a letter dated April 1, 2019, and signed by Parish President Michael S. Yenni (MSY). Such letter was sent via email to HUD on June 21, 2019, the submission of which was one (1) day after the commencement of this internal audit. Over eight (8) months passed before a request letter was drafted, and nearly three (3) more months passed before its submission to HUD to formally request the extension. The timeline of activity is shown below.

Activity	Date	Time Lapse from Start (Approx.)
Exit Conference	July 19, 2018	Start
Report Received by Parish	September 13, 2018	2 months (56 days)
Extension Letter signed by MSY	April 1, 2019	8.5 months (256 days)
Commencement of this audit	June 20, 2019	n/a
Extension Request sent to HUD	June 21, 2019	11 months (337 days)

See Attachment D for the referenced communications.

The Round 5 funding totals \$9,868,071.68. As of July 31, 2019, \$1,534,048.45 had been drawn down leaving \$8,334,023.23 remaining for drawn down. As of July 31, 2019, approval to extend the deadline from August 14, 2019, to September 30, 2022, had not been received from HUD.

During this audit, Internal Audit met with the Chief Administrative Assistant (CAA), Mr. Darryl Ward, to whom the Department of Community Development reports. Mr. Ward believed that the extension had been requested before June 21, 2019, and thought that the extension would be approved.

SUGGESTIONS

1A) Recommendations made by HUD via the onsite monitoring reports should be implemented in a timely manner. Not requesting an extension to expend Round 5 funding places over \$8.3 million at risk. This funding is critical to serving the needs of Jefferson Parish citizens, as outlined in the Action Plan formulated via this program.

1B) To ensure that proper communication is in place between the Director and CAA, Internal Audit recommends a quarterly "Dashboard Report" be provided to the CAA. The report should highlight items such as the amount of grant funds received, the grant activities that occurred, the amount of grant funds remaining to be utilized, and any applicable due date. Such a Dashboard Report could be based on the Quarterly Performance Report. Effective communication between the Director and CAA may have prevented a delay in requesting the extension for Round 5 funding, which placed the parish at risk for losing funding.

FINDING #2

CRITERIA

The HUD monitoring report received by Jefferson Parish on September 13, 2018, found that the parish did not finalize or implement a policy for its Internal Audit function.

Excerpt from the HUD monitoring report, Page 5:

Condition: The Parish did not comply with the internal audit requirement outlined in 78 Federal Register 14334. According to 78 Federal Register 14334, an internal auditor is required to conduct a review of the grantee's administration of its program, and the process for performing the internal audits must be described in the grantee's policies and procedures. The Parish's policies and procedures did not describe the process used to perform internal audits of the CDBG-DR grants. As a result, the Parish did not perform an internal audit of the CDBG-DR funds.

FINDING

The policies and procedures manual has not been updated to describe the process used to perform internal audits.

OBSERVATIONS

Internal Audit reviewed the CDBG-DR Policies and Procedures Manual with the focus on the internal audit function as referenced in the HUD monitoring report. (See Attachment E for excerpts.) According to the “Summary of Changes,” the Jefferson Parish Department of Community Development is operating on Version 4.0 of the relevant Policies and Procedures Manual, which was last updated in June 2017. This means that the manual was not updated since receipt of the HUD monitoring report on September 13, 2018.

Verbiage within Section 11.4 of the Policies include inaccuracies and should be revised accordingly. Specifically, the policy indicates that the “Department of Internal Audit is responsible for maintaining a reporting line, independent of JPDCD’s management team, to the JPDCD Finance Department as it relates to JPDCD activities...” In actuality, the Director [of Internal Audit] shall be responsible for reporting audit findings to the Council, the Parish President and the Office of Inspector General and providing recommendations for improving areas where opportunities or deficiencies are identified.^c

The policy (Section 11.4) continues by indicating that the “Department of Internal Audit is responsible for assisting JPDCD with the coordination and review of all external audits, including the annual JPDCD Financial Statement Audit, the Louisiana State Single Audit/OMB A-133 audit of JPDCD and the OMB A-133 audit of JPDCD’s subrecipients, as well as any audits conducted by the Louisiana Legislative Auditor.” However, this is not the direct responsibility of Internal Audit and appears to contradict Section 5.10 of the same policy which states that the “Jefferson Parish Finance Office is responsible for ensuring that all audits including the single audit are completed in a timely manner and meet all federal requirements. “

See Attachment E for excerpted sections of the policy.

The process used to perform internal audits was adopted as Ordinance No. 25549 at a Jefferson Parish Council meeting held on April 4, 2018. The full Ordinance is included in Attachment F. Specifically Sec.2-162.2 – Independence and Objectivity; Professional Standards, and Sec. 2-162.3 – Duties of the director contain language about the process of developing and implementing a plan of audit coverage and standards used in the completion of such audits. Verbiage regarding this process should be incorporated into the CDBG-DR Policies and Procedures Manual.

SUGGESTION

The CDBG-DR Policies and Procedures Manual should be updated as noted, and the Department of Community Development should continue working with the Department of Internal Audit to aid in successfully completing audits. Formalized and accurate policies and procedures serve as a blueprint of controls and help to ensure that the department remains in compliance with funder requirements, and grant awards are not jeopardized.

^c Jefferson Parish Code of Ordinance, Section 2-162.3(j)

FINDING #3

CRITERIA

The HUD monitoring report received by Jefferson Parish on September 13, 2018, required the parish to respond within thirty (30) days of report letter, which was September 7, 2018. The response was due to HUD by October 7, 2018.

FINDING

A formal response to the HUD Monitoring report dated September 7, 2018, was not provided to HUD.

OBSERVATIONS

In the initial request for documentation for this audit was sent to the department on June 20, 2019. Internal Audit asked for the response to the HUD Monitoring report received September 13, 2018, which was due 30 days of receipt. The department requested an extension of time to locate the response since the department transitioned from one director, Tamithia Shaw, to another director, Nicole Fontenot, during the course of this audit. See below for an excerpt of the request for documentation, along with the department's response.

8) Response to the HUD Monitoring report received September 13, 2018, which was due 30 days of receipt – Due to the departure of Ms. Tamithia P. Shaw, prior Director of JPDCD, we respectfully request an extension of time to provide an answer to this inquiry until Monday, July 15, 2019.

Internal Audit followed up on this item in a meeting with the department on July 31, 2019. The department could not locate a response to the Monitoring report and was unsure if such a response had been provided to HUD. Since the department cannot verify the existence of the response, Internal Audit is under the belief that a formal response was not sent to HUD.

SUGGESTION

Responses to monitoring reports and any other HUD communications should be made within the timeframe as requested by HUD, or otherwise in a timely manner if no due date is given. Part of being good stewards of grant funds is timely and accurate communications to the funder. Not doing so could jeopardize the parish's future ability to receive grant funding.



FINDING #4

CRITERIA

Public Law 113-2 states that “the Secretary shall require grantees to maintain on a public website information accounting for how all grant funds are used, including details of all contracts and ongoing procurement processes.”

Section 2.2 of the CDBG-DR Policies and Procedures Manual states that “As grantees of Community Development Block Grant – Disaster Recovery (CDBG-DR) funds, Jefferson Parish Government will use the JPDCD Disaster Recovery website as a tool provide transparency for all CDBG-DR projects. JPDCD’s disaster recovery webpage provides a space for sharing with the public, current information on CDBG-DR projects, the progress of individual projects, and updated reporting tracking allocations and expenditures for all CDBG-DR programs and projects. The Parish strives to provide a wide audience of stakeholders and other interested observers a real-time account of the recovery efforts being undertaken in their communities and a clear understanding of the how the Parish administers the efforts.”

FINDING

The Department of Community Development did not comply with three (3) of seven (7) qualitative factors tested for compliance in terms of information posted on the Disaster Relief website.^d

OBSERVATIONS

Internal Audit selected sections as listed below from the CDBG-DR Policies and Procedures manual to test for compliance. While the website contains a wealth of information, three (3) of the seven (7) factors were found to be deficient.

<u>No Exceptions Noted</u>	<u>Exceptions Noted / Deficient</u>
✓ Initial Action Plan	X Public Comments
✓ Amendments	X Quarterly Performance Reports
✓ Master Action Plan	X Website Maintenance
✓ Link to Public Notices	

See Attachment G for detailed results of the testing.

SUGGESTION

The Department of Community Development should ensure that information posted on the Disaster Relief website is accurate, comprehensive, and in accordance with current policies and procedures. As per the policy itself, “the JPDCD Disaster Recovery website (should be used) as a tool (to) provide transparency for all CDBG-DR projects. JPDCD’s disaster recovery webpage provides a space for sharing with the public, current information on CDBG-DR projects, the progress of individual projects, and updated reporting tracking allocations and expenditures for all CDBG-DR programs and projects. The Parish strives to provide a wide audience of stakeholders and other interested observers a real-time account of the recovery efforts being undertaken in their communities and a clear understanding of the how the Parish administers the efforts.”

^d <http://www.jeffparish.net/index.aspx?page=3671>

SUMMARY

In summary, the audit highlighted areas in the CDBG-DR Policies and Procedures Manual and areas of the Disaster Relief website that needs to be corrected or updated. Overall, however, the main concern is the delay in requesting the extension for Round 5 funding which currently has \$8.3 million remaining to drawdown. The extension was requested eleven (11) months after HUD recommended it be requested. Although it is believed that the extension will be approved, the delay is concerning as it places the parish at risk for losing funding should it not be approved. The due date for drawing down over \$8.3 million in funding is within two (2) weeks of the conclusion of this audit. Quite simply, the timing is “too close for comfort.”

The Department of Community Development should review and take appropriate actions as noted in the four (4) findings contained within this report.

REPORT WRAP UP

Internal Audit obtained responses from both the Department and the Parish Administration which can be found in Attachments #2 and #3, immediately following this report.

******END******



ATTACHMENT A

GRANT AGREEMENTS



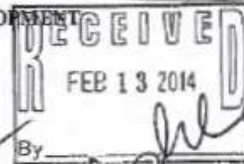
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

FEB 12 2014

John F. Young, Jr.
Parish President
Jefferson Parish
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

New Orleans Field Office
Hale Boggs Federal Building
501 Magazine Street, 9th Floor
New Orleans, LA 70130-3049



SUBJECT: Award letter for a HUD CDBG-DR grant for Hurricane Isaac recovery

Dear Mr. Young:

I am pleased to inform you that the Department of Housing and Urban Development (the Department) has approved Jefferson Parish's \$16,453,000 disaster recovery Action Plan, which utilizes Community Development Block Grant (CDBG) disaster recovery funds appropriated under the Disaster Relief Appropriations Act, 2013 (P.L. 113-2). These funds must be used for recovery in the most impacted and distressed areas damaged by Hurricane Isaac.

On February 5, 2014, Jefferson Parish submitted a non-substantial Action Plan amendment requesting that the Department obligate \$338,595 of the Parish's total Hurricane Isaac funding of \$16,453,000. The Department approves this amendment. This amount is reflected in the enclosed three copies of the grant agreement, along with special conditions. As noted in the grant agreement, the Department has assigned the following grant number to these funds: B-13-US-22-0001. Please execute all three copies and return them via overnight delivery with original signatures to: Cheryl Breaux, CPD Director, New Orleans Field Office, Department of Housing and Urban Development, 500 Poydras Street, 9th Floor, New Orleans, LA 70130.

Once received from Jefferson Parish, the grant agreements will be executed by the Department. A fully executed copy will be returned to you. The date that the Department signs the grant agreement is the date on which the funds are obligated. Under the provisions of the Disaster Relief Appropriations Act, 2013, all funds obligated by the grant agreement must be expended within two years of the date on which the Department signs the grant agreement. The Department will establish Jefferson Parish's line of credit account for this grant upon execution of the agreement.

Jefferson Parish's CDBG disaster recovery line of credit will be accessible through HUD's Disaster Recovery Grant Reporting (DRGR) system. Please contact the DRGR Help Desk at drgr_help@hud.gov to resolve any access issues. Please be advised that Jefferson Parish is required to report on its use of CDBG-DR funds outlined in the Action Plan through the DRGR. The DRGR reporting requirements are outlined in detail in a Federal Register Notice published March 5, 2013 at 78 FR 14329 (incorporated by reference in the Notice published May 29, 2013 at 78 FR 32262).

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The funds represent an on-going commitment by President Obama and HUD to assist the State and local governments across Louisiana in their efforts to recover from the damage caused by Hurricane Isaac. HUD looks forward to continuing to work with you and your staff in partnership to address Jefferson Parish's recovery needs. If you or any members of your staff have questions, or would like to register new DRGR users, please contact Mr. Russell Quiniola, Disaster Recovery Specialist, Disaster Recovery and Special Issues Division, at (504) 671-3017 or at russell.e.quiniola@hud.gov.

Sincerely,

A handwritten signature in black ink that reads "Cheryl S. Breaux". The signature is written in a cursive, flowing style.

Cheryl S. Breaux, Director
Community Planning and Development
New Orleans Field Office

Enclosures

CC: Tony Brual

Funding Approval/Agreement

Title I of the Housing and Community Development Act (Public Law 930383)
HI-00515R of 20515R

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Community Development Block Grant Program

OMB Approval No.
2506-0193 (exp 1/31/2015)

1. Name of Grantee (as shown in Item 5 of Standard Form 424) Jefferson Parish		3a. Grantee's 9-digit Tax ID Number: 72-6013920	3b. Grantee's DUNS Number: 849231915	4. Date use of funds may begin (mm/dd/yyyy): 08/29/2012
2. Grantee's Complete Address (as shown in Item 5 of Standard Form 424) Jefferson Parish 1221 Elmwood Park Blvd., Suite 605 Jefferson, LA 70123		5a. Project/Grant No. 1 B-13-US-22-0001		5a. Amount Approved
		5b. Project/Grant No. 2		5b. Amount Approved
		5c. Project/Grant No. 3		5c. Amount Approved

GRANT Agreement: This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC §301 et seq.). The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions/addendums, constitute part of the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in Item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval. The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58. The Grantee further acknowledges its responsibility for adherence to the Agreement by sub-recipient entities to which it makes funding assistance hereunder available.

U.S. Department of Housing and Urban Development (By Name) Cheryl S. Breaux		Grantee Name John F. Young, Jr.	
Title Director, CPD, New Orleans Field Office		Title Parish President, Jefferson Parish	
Signature	Date (mm/dd/yyyy)	Signature	Date (mm/dd/yyyy)

7. Category of Title I Assistance for this Funding Action (check only one) <input checked="" type="checkbox"/> a. Entitlement, Sec 106(b) <input type="checkbox"/> b. State-Administered, Sec 106(d)(1) <input type="checkbox"/> c. HUD-Administered Small Cities, Sec 106(d)(2)(B) <input type="checkbox"/> d. Indian CDBG Programs, Sec 109(a)(1) <input type="checkbox"/> e. Surplus Urban Renewal Funds, Sec 112(b) <input type="checkbox"/> f. Special Purpose Grants, Sec 107 <input type="checkbox"/> g. Loan Guarantee, Sec 108	8. Special Conditions (check one) <input type="checkbox"/> None <input checked="" type="checkbox"/> Attached	9a. Date HUD Received Submission (mm/dd/yyyy): 08/29/2013	10. Check one <input checked="" type="checkbox"/> a. Orig. Funding Approval <input type="checkbox"/> b. Amendment Amendment Number
		9b. Date Grantee Notified (mm/dd/yyyy): 11/05/2013	
11. Amount of Community Development Block Grant		FY () FY () FY ()	
a. Funds Reserved for this Grantee		\$18,453,000	
b. Funds now being Approved		\$338,595	
c. Reservation to be Cancelled (11a minus 11b)			

12a. Amount of Loan Guarantee Commitment now being Approved	12b. Name and complete Address of Public Agency
Loan Guarantee Acceptance Provisions for Designated Agencies: The public agency hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided it.	12c. Name of Authorized Official for Designated Public Agency
	Title
	Signature

HUD Accounting use Only

Batch	TAC	Program	Y	A	Reg	Ass	Document No.	Project Number	Category	Amount	Effective Date (mm/dd/yyyy)	F
153	176											
			Y					Project Number		Amount		
			Y					Project Number		Amount		
Date Entered PAS (mm/dd/yyyy)	Date Entered LOCCS (mm/dd/yyyy)	Batch Number	Transaction Code	Entered By	Verified By							

24 CFR 570 form HUD-7082 (11/10)

NE Wells 5/4/15

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT



OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

New Orleans Field Office
Hale Boggs Federal Building
501 Magazine Street, 9th Floor
New Orleans, LA 70130-3099

APR 30 2015
John F. Young, Jr.
Parish President
Jefferson Parish
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123



SUBJECT: HUD CDBG-DR Grant Agreement Two for Hurricane Isaac Recovery

Dear Mr. Young:

I am pleased to inform you that the Department of Housing and Urban Development (HUD) has approved Jefferson Parish's second Community Development Block Grant Disaster Recovery (CDBG-DR) grant agreement request in the amount of \$609,259, which utilizes disaster recovery funds appropriated under the Disaster Relief Appropriations Act, 2013 (P.L. 113-2). These funds must be used for recovery in the most impacted and distressed areas damaged by Hurricane Isaac.

In its grant agreement request number two (2), Jefferson Parish requested that HUD obligate an additional \$609,259 of their total allocation of \$64,379,084, bringing the total approved amount of CDBG-DR funds to \$947,854. This amount is reflected in the enclosed three copies of the grant agreement, along with special conditions. As noted in the grant agreement, the Department has assigned the following grant number to these funds: B-13-US-22-0001. Please execute all three copies and return them via overnight delivery with original signatures to: Cheryl Breaux, CPD Director, New Orleans Field Office, Department of Housing and Urban Development, 500 Poydras Street, 9th Floor, New Orleans, LA 70130.

Once received from Jefferson Parish, the grant agreements will be executed by HUD. A fully executed copy will be returned to you. The date that HUD signs the grant agreement is the date on which the funds are obligated. Under the provisions of the Disaster Relief Appropriations Act, 2013, all funds obligated by the grant agreement must be expended within two years of the date on which HUD signs the grant agreement. HUD will establish Jefferson Parish's line of credit account for this grant upon execution of the agreement.

Jefferson Parish's CDBG disaster recovery line of credit will be accessible through HUD's Disaster Recovery Grant Reporting (DRGR) system. Please contact the DRGR Help Desk at drgr_help@hud.gov to resolve any access issues. Please be advised that Jefferson Parish is required to report on its use of CDBG-DR funds outlined in the Action Plan through the DRGR. The DRGR reporting requirements are outlined in detail in a Federal Register Notice published March 5, 2013 at 78 FR 14329 (incorporated by reference in the Notice published May 29, 2013 at 78 FR 32262).

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The funds represent an on-going commitment by President Obama and HUD to assist Jefferson Parish in their efforts to recover from the damage caused by Hurricane Isaac. HUD looks forward to continuing to work with you and your staff in partnership to address Jefferson Parish's recovery needs. If you or any members of your staff have questions, please contact Mr. Russell Quiniola, Disaster Recovery Specialist, Disaster Recovery and Special Issues Division, at (504) 671-3017 or at russell.e.quiniola@hud.gov.

Sincerely,

A handwritten signature in black ink that reads "Cheryl S. Breaux". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Cheryl S. Breaux, Director
Community Planning and Development
New Orleans Field Office

Enclosures

CC: Nikole Ellis-Wells

Funding Approval/Agreement

Title I of the Housing and Community
Development Act (Public Law 93-383)
HI-00515R of 20515R

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Community Development Block Grant Program

OMB Approval No.
2506-0193 (exp 1/31/2015)

1. Name of Grantee (as shown in item 5 of Standard Form 424)
Jefferson Parish

5a. Grantee's 9-digit Tax ID Number:
72-6013920

3b. Grantee's DUNS Number:
785988501

4. Date use of funds may begin (mm/dd/yyyy):
08/29/2012

2. Grantee's Complete Address (as shown in item 5 of Standard Form 424)
Jefferson Parish
Office of Community Development
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123

5a. Project/Grant No. 1
B-13-US-22-0001

5b. Project/Grant No. 2

5c. Project/Grant No. 3

5a. Amount Approved

5b. Amount Approved

5c. Amount Approved

Grant Agreement: This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC 5301 et seq.). The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions/addendums, constitute part of the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval. The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58. The Grantee further acknowledges its responsibility for adherence to the Agreement by sub-recipient entities to which it makes funding assistance hereunder available.

U.S. Department of Housing and Urban Development (By Name)
Cheryl S. Breaux

Grantee Name
John F. Young, Jr.

Title
Director, CPD, New Orleans Field Office

Parish President, Jefferson Parish

Signature
Cheryl S. Breaux

Signature
John F. Young, Jr.

Date (mm/dd/yyyy)
5/13/2015

Date (mm/dd/yyyy)
5/7/2015

7. Category of Title Assistance for this Funding Action (check only one)
☒ a. Entitlement, Sec 106(c) CDBG-DR
☐ b. State-Administered, Sec 106(d)(1)
☐ c. HUD-Administered Small Cities, Sec 106(d)(2)(B)
☐ d. Indian CDBG Programs, Sec 106(a)(1)
☐ e. Surplus Urban Renewal Funds, Sec 112(b)
☐ f. Special Purpose Grants, Sec 107
☐ g. Loan Guarantee, Sec 108

8. Special Conditions (check one)
☐ None
☒ Attached

9a. Date HUD Received Submission (mm/dd/yyyy)
04/13/2015

9b. Date Grantee Notified (mm/dd/yyyy)

9c. Date of Start of Program Year (mm/dd/yyyy)

10. check one
☐ a. Orig. Funding Approval
☒ b. Amendment
Amendment Number

11. Amount of Community Development Block Grant

	FY ()	FY ()	FY ()
a. Funds Reserved for this Grantee	\$16,453,000		
b. Funds now being Approved	\$947,854		
c. Reservation to be Cancelled (11a minus 11b)			

12a. Amount of Loan Guarantee Commitment now being Approved

12b. Name and complete Address of Public Agency

Loan Guarantee Acceptance Provisions for Designated Agencies:
The public agency hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided it.

12c. Name of Authorized Official for Designated Public Agency

Title

Signature

HUD Accounting use Only

Batch	TAC	Program	Y	A	Reg	Area	Document No.	Project Number	Category	Amount	Effective Date (mm/dd/yyyy)	F
	153											
	176											
			Y					Project Number		Amount		
			Y					Project Number		Amount		
Date Entered PAS (mm/dd/yyyy)								Batch Number	Transaction Code	Entered By	Verified By	

24 CFR 570 form HUD-7082 (11/10)



OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

New Orleans Field Office
Hale Boggs Federal Building
500 Poydras Street, 9th Floor
New Orleans, LA 70130-3099

66-16
RECEIVED
FEB 26 2016
BY: _____

FEB 23 2016
Michael S. Yenni
Parish President
Jefferson Parish
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123

SUBJECT: Executed HUD CDBG-DR Grant Agreement Three

Dear President Yenni:

Please find the enclosed copy of the executed Community Development Block Grant disaster recovery (CDBG-DR) grant agreement three. The date that HUD signed the grant agreement is the date on which the funds are obligated. Under the provisions of the Disaster Relief Appropriations Act, 2013, all funds obligated by the grant agreement must be expended within two years of the executed grant agreement. Jefferson Parish's CDBG disaster recovery line of credit will be accessible through HUD's Disaster Recovery Grant Reporting (DRGR) system. Please be advised that Jefferson Parish is required to report on its use of CDBG-DR funds outlined in the Action Plan through the DRGR. The DRGR reporting requirements are outlined in detail in a Federal Register Notice published March 5, 2013 at 78 FR 14329 (incorporated by reference in the Notice published May 29, 2013 at 78 FR 32262).

If you or any members of your staff have questions, please contact Marlet Becnel, Senior Community Planning and Development Representative, at (504) 671-3009 or marlet.c.becnel@hud.gov.

Sincerely,

Cheryl S. Breaux, Director
Community Planning and Development
New Orleans Field Office

Enclosures

Funding Approval/Agreement

Title I of the Housing and Community Development Act (Public Law 930383)
 HI-00515R of 20515R

U.S. Department of Housing and Urban Development
 Office of Community Planning and Development
 Community Development Block Grant Program

OMB Approval No.
 2506-0193 (exp 1/31/2015)

1. Name of Grantee (as shown in item 5 of Standard Form 424) Jefferson Parish		3a. Grantee's 9-digit Tax ID Number: 72-6013920	3b. Grantee's DUNS Number: 785988501	4. Date use of funds may begin (mm/dd/yyyy): 08/28/2012
2. Grantee's Complete Address (as shown in item 5 of Standard Form 424) Jefferson Parish Office of Community Development 1221 Elmwood Park Blvd., Suite 805 Jefferson, LA 70123		5a. Project/Grant No. 1 B-13-US-22-0001		6a. Amount Approved \$2,416,230
		5b. Project/Grant No. 2		6b. Amount Approved
		5c. Project/Grant No. 3		6c. Amount Approved

Grant Agreement: This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC 5301 et seq.). The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions/addendums, constitute part of the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval. The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58. The Grantee further acknowledges its responsibility for adherence to the Agreement by sub-recipient entities to which it makes funding assistance hereunder available.

U.S. Department of Housing and Urban Development (By Name) Cheryl S. Breaux		Grantee Name Michael S. Yenni	
Title Director, Office of Community Planning and Development		Title Parish President	
Signature <i>Cheryl S. Breaux</i>		Signature <i>Michael S. Yenni</i>	
Date (mm/dd/yyyy) 2/14/2016		Date (mm/dd/yyyy) 2/3/16	
7. Category of Title I Assistance for this Funding Action (check only one) <input type="checkbox"/> a. Entitlement, Sec 106(b) <input type="checkbox"/> b. State-Administered, Sec 106(d)(1) <input type="checkbox"/> c. HUD-Administered Small Cities, Sec 106(d)(2)(B) <input type="checkbox"/> d. Indian CDBG Programs, Sec 108(a)(1) <input type="checkbox"/> e. Surplus Urban Renewal Funds, Sec 112(b) <input type="checkbox"/> f. Special Purpose Grants, Sec 107 <input type="checkbox"/> g. Loan Guarantee, Sec 108 X PL 113-2		8. Special Conditions (check one) <input type="checkbox"/> None <input checked="" type="checkbox"/> Attached X Additional Terms And Conditions	
		9. Date HUD Received Submission (mm/dd/yyyy) 9a. Date Grantee Notified (mm/dd/yyyy) 9c. Date of Start of Program Year (mm/dd/yyyy)	
		10. Check one: <input type="checkbox"/> a. Orig. Funding Approval <input checked="" type="checkbox"/> b. Amendment Amendment Number R3	
11. Amount of Community Development Block Grant			
a. Funds Reserved for this Grantee		FY (2016)	FY ()
b. Funds now being Approved		\$16,453,000	\$1,468,378
c. Reservation to be Cancelled (11a minus 11b)			

12a. Amount of Loan Guarantee Commitment now being Approved	12b. Name and complete Address of Public Agency
Loan Guarantee Acceptance Provisions for Designated Agencies: The public agency hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided it.	12c. Name of Authorized Official for Designated Public Agency
	Title
	Signature

HUD Accounting use Only

Batch	TAC	Program	Y	A	Reg	Area	Document No.	Project Number	Category	Amount	Effective Date (mm/dd/yyyy)	F
	153											
	176											
			Y					Project Number		Amount		
			Y					Project Number		Amount		
Date Entered PAS (mm/dd/yyyy)		Date Entered LOCCS (mm/dd/yyyy)		Batch Number		Transaction Code		Entered By		Verified By		

24 CFR 570 form HUD-7092 (11/10)

TShaw 5/26/16



OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

New Orleans Field Office
Hale Boggs Federal Building
500 Poydras Street, 9th Floor
New Orleans, LA 70130-3099



MAY 20 2016

Michael S. Yenni
Parish President
Jefferson Parish
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123

SUBJECT: Executed HUD CDBG-DR Grant Agreement #4

Dear President Yenni:

Please find the enclosed copy of the executed Community Development Block Grant disaster recovery (CDBG-DR) grant agreement number four. The date that HUD signed the grant agreement is the date on which the funds are obligated. Under the provisions of the Disaster Relief Appropriations Act, 2013, all funds obligated by the grant agreement must be expended within two years of the executed grant agreement. Jefferson Parish's CDBG disaster recovery line of credit will be accessible through HUD's Disaster Recovery Grant Reporting (DRGR) system. Please be advised that Jefferson Parish is required to report on its use of CDBG-DR funds outlined in the Action Plan through the DRGR. The DRGR reporting requirements are outlined in detail in a Federal Register Notice published March 5, 2013 at 78 FR 14329 (incorporated by reference in the Notice published May 29, 2013 at 78 FR 32262).

If you or any members of your staff have questions, please contact Mariet Becnel, Senior Community Planning and Development Representative, at (504) 671-3009 or mariet.c.becnel@hud.gov.

Sincerely,

Cheryl S. Breau, Director
Community Planning and Development
New Orleans Field Office

Enclosure



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

JUN 25 2018

Mr. Michael S. Yenni
Parish President
1221 Elmwood Park Boulevard, 10th Floor
Joseph S. Yenni Building
Jefferson, LA 70123-2337

Dear Mr. Yenni:

Pursuant to the Disaster Relief Appropriations Act, 2013 (the Act), the Department has awarded a grant of \$16,453,000 in Community Development Block Grant disaster recovery (CDBG-DR) funds to Jefferson Parish, Louisiana (B-13-US-22-0001). These funds have been fully obligated to the grantee under five obligations. Pursuant to the requirements of the Act, obligated funds must be expended within 24 months following obligation, unless an extension of that deadline has been approved by HUD.

On May 11, 2015, the Department published a *Federal Register* Notice outlining the process and criteria for a grantee receiving funds under the Act to receive an extension of an expenditure deadline (80 FR 26942). On May 18, 2018, Jefferson Parish submitted its CDBG-DR Expenditure Deadline Extension Request as required by the Notice, with a request to extend the expenditure deadline for a portion of the grant funds. The amount of funds that will be extended are shown below by program category and obligation round. The grantee may make budget adjustments between DRGR activities within each identified program category and obligation round, however, funds may not be adjusted between these categories or obligation rounds without express authorization from HUD as defined in the May 11, 2015, *Federal Register* Notice.

Program Category	Amount Extended*
Infrastructure (R4)	\$2,561,802.75
Total:	\$2,561,802.75

* The Amount Extended represents the sum of the balance remaining for the DRGR Activities included in the grantee's extension request within each Program Category and Obligation Round as of the date of this letter.

As outlined in the Notice, the Department has assessed the Expenditure Deadline Extension Request to ensure the revised expenditure deadline is sufficient, and the grantee's projection of quarterly expenditures are achievable based on the grantee's past performance and expenditure rate. The Department has concluded that the grantee's requested timeline appears to be achievable, and the extension is granted as requested. The Department is approving Jefferson Parish, Louisiana's request to extend the time for the expenditure of funds identified above until September 30, 2022.

Within 30 calendar days of this notice, the grantee must make amendments to its written Action Plan and Quarterly Expenditure Projections that may be needed to reflect the extension. The Department will coordinate with the grantee to revise the DRGR Action Plan and Block Dates as needed, and to take any other appropriate action.

Thank you for your interest in the Department's programs.

Sincerely,



Stanley Gimont
Deputy Assistant Secretary
for Grant Programs

Mr. Shaw 8/15/17

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

New Orleans Field Office
Hale Boggs Federal Building
500 Poydras Street, 9th Floor
New Orleans, LA 70130-3099



OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

AUG 14 2017

Michael S. Yenni
Parish President
Jefferson Parish
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123

SUBJECT: Executed HUD CDBG-DR Grant Agreement #5

Dear President Yenni:

Please find enclosed an executed copy of grant agreement #5 under the Community Development Block Grant Disaster Recovery (CDBG-DR) program. This agreement represents the fifth and final obligation of CDBG-DR funds awarded to the Parish in response to Hurricane Isaac. The date that HUD signed the grant agreement is the date on which the funds are obligated. Under the provisions of the Disaster Relief Appropriations Act, 2013, all funds obligated by the grant agreement must be expended within two years of the executed grant agreement. However, as reflected in the amended grant conditions, it is noted that the Parish must expend grant funds within 24-months of the date on which the funds were obligated in accordance with the Cumulative Expenditure Schedule. This schedule is outlined in the revised CDBG-DR grant terms and conditions described in the enclosed Amended Grant Agreement, which is attached to the HUD-7082.


In addition, now that HUD has executed the grant agreement, the Cumulative Expenditure Schedule has been updated to identify the obligation date and the associated 2-year expenditure deadline. We were unable to identify those dates until the agreement had been executed by HUD. Please note that the amount approved in Block 6a of the HUD-7082 was corrected from \$6,584,928.32 to \$16,453,000. This correction was necessary to document that 100% of the Isaac grant has been approved and obligated with the execution of grant agreement #5, which represents the fifth and final obligation. In accordance with this correction, we also updated paragraph 8 of the Amended Grant Agreement attached to the HUD-7082. Please ensure that your records are updated accordingly.

Jefferson Parish's CDBG disaster recovery line of credit will be accessible through HUD's Disaster Recovery Grant Reporting (DRGR) system. Please be advised that Jefferson Parish is required to report on its use of CDBG-DR funds outlined in the Action Plan through the DRGR. The DRGR reporting requirements are outlined in detail in a Federal Register Notice published March 5, 2013 at 78 FR 14329 (incorporated by reference

in the Notice published May 29, 2013 at 78 FR 32262).

If you or any members of your staff have questions, please contact Marlet Becnel, Senior Community Planning and Development Representative, at (504) 671-3009 or marlet.c.becnel@hud.gov.

Sincerely,

A handwritten signature in black ink that reads "Cheryl S. Breaux". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Cheryl S. Breaux, Director
Community Planning and Development
New Orleans Field Office

Enclosure

Funding Approval/Agreement

Title I of the Housing and Community
Development Act (Public Law 930383)
HI-00515R of 20515R

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Community Development Block Grant Program

OMB Approval No.
2506-0193 (exp 1/31/2015)

1. Name of Grantee (as shown in item 5 of Standard Form 424) Jefferson Parish		3a. Grantee's 9-digit Tax ID Number: 72-8013920	3b. Grantee's DUNS Number: 785986501	4. Date use of funds may begin (mm/dd/yyyy): 08/29/2012
2. Grantee's Complete Address (as shown in item 5 of Standard Form 424) Jefferson Parish Office of Community Development 1221 Elmwood Park Blvd., Suite 605 Jefferson, LA 70123		5a. Project/Grant No. 1 B-13-US-22-0001	6a. Amount Approved 16,453,000	
		5b. Project/Grant No. 2	6b. Amount Approved	
		5c. Project/Grant No. 3	6c. Amount Approved	

Grant Agreement: This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC 5301 et seq.). The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions/addendums, constitute part of the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval. The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58. The Grantee further acknowledges its responsibility for adherence to the Agreement by sub-recipient entities to which it makes funding assistance hereunder available.

U.S. Department of Housing and Urban Development (By Name) Cheryl S. Breau		Grantee Name Michael S. Yenni	
Title Director, Office of Community Planning and Development		Title Parish President	
Signature <i>Cheryl S. Breau</i>		Signature <i>Michael S. Yenni</i>	
Date (mm/dd/yyyy) 8-14-2017		Date (mm/dd/yyyy) 08/07/2017	
7. Category of Title I Assistance for this Funding Action (check only one) <input type="checkbox"/> a. Entitlement, Sec 106(b) <input type="checkbox"/> b. State-Administered, Sec 106(d)(1) <input type="checkbox"/> c. HUD-Administered Small Cities, Sec 106(d)(2)(B) <input type="checkbox"/> d. Indian CDBG Programs, Sec 106(a)(1) <input type="checkbox"/> e. Surplus Urban Renewal Funds, Sec 112(b) <input type="checkbox"/> f. Special Purpose Grants, Sec 107 <input type="checkbox"/> g. Loan Guarantee, Sec 108 <input checked="" type="checkbox"/> PL 113-2		8. Special Conditions (check one) <input type="checkbox"/> None <input type="checkbox"/> Attached <input checked="" type="checkbox"/> Additional Terms and Conditions	
		9a. Date HUD Received Submission (mm/dd/yyyy) 08/07/2017 9b. Date Grantee Notified (mm/dd/yyyy) 08/07/2017 9c. Date of Start of Program Year (mm/dd/yyyy)	
		10. check one <input type="checkbox"/> a. Orig. Funding Approval <input checked="" type="checkbox"/> b. Amendment Amendment Number R5	
		11. Amount of Community Development Block Grant a. Funds Reserved for this Grantee FY (17) \$16,453,000 b. Funds now being Approved \$9,868,071.68 c. Reservation to be Cancelled (11a minus 11b)	

12a. Amount of Loan Guarantee Commitment now being Approved	12b. Name and complete Address of Public Agency
Loan Guarantee Acceptance Provisions for Designated Agencies: The public agency hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided it.	
12c. Name of Authorized Official for Designated Public Agency	
Title	
Signature	

HUD Accounting use Only												
Batch	TAC	Program	Y	A	Reg	Area	Document No.	Project Number	Category	Amount	Effective Date (mm/dd/yyyy)	F
	153											
	176											
			Y					Project Number		Amount		
			Y					Project Number		Amount		
Date Entered PAS (mm/dd/yyyy)		Date Entered LOGCS (mm/dd/yyyy)		Batch Number		Transaction Code		Entered By		Verified By		



**Amended Grant Agreement
CDBG Disaster Recovery Assistance
Jefferson Parish, Louisiana
(Disaster Recovery Appropriations Act, 2013 P.L. 113-2)**

1. The grantee must use these Community Development Block Grant disaster recovery (CDBG-DR) funds in accordance with Public Law 113-2, Disaster Relief Appropriations Act, 2013 (approved January 29, 2013). This grant agreement governs the use of all funds made available to the grantee under grant number B-13-US-22-0001. The provisions of this grant agreement replace any provisions previously provided for in previous grant agreements that governed grant number B-13-US-22-0001.
2. The grantee is required to expend the funds governed by this grant agreement within two years of the date HUD obligated the funds. The HUD obligation date is the date of the grant agreement or amended grant agreement that made the respective funds available to the grantee. Expenditure deadlines for all funds obligated by this amended grant agreement or earlier grant agreements are summarized in a table below. Funds with an expenditure deadline that occurs prior to September 30, 2017, will be returned to the Department and may be reallocated if unexpended by the expenditure deadline. After September 30, 2017, funds unexpended by the applicable expenditure deadline will be returned to the U.S. Treasury.
3. The grantee must comply with all Notice requirements, waivers and alternative requirements issued by the U.S. Department of Housing and Urban Development with respect to this grant, including *Federal Register* Notices that HUD publishes in the future to issue additional waivers and alternative requirements.
4. The grantee must comply with the Housing and Community Development Act of 1974, as amended, and the regulations governing the CDBG program at 24 CFR part 570, unless the Department has waived any of these requirements or established alternative requirements. The grantee is advised to pay particular attention to: regulations at 24 CFR part 58 pertaining to environmental review requirements; labor standards requirements of 42 U.S.C. 5310, and to act in conformance with cost principles applicable to federal grants, as directed by HUD regulations at 24 CFR part 570, and as may be amended from time to time.
5. The grantee's submissions, the Notices identified in term 3 (above), and the Funding Approval/Agreement (HUD form 7082) are incorporated by reference and constitute part of this Grant Agreement. Submissions include the CDBG-DR action plans and amendments, including the certifications and assurances and any information or documentation required to meet any grant award conditions.
6. The grantee must comply with the requirements of 24 CFR part 5, subpart K, Application, Registration, and Submission Requirements, and 2 CFR part 25 Universal Identifier and System for Award Management (SAM). The grantee must have an active registration in SAM in accordance with 2 CFR part 25, Appendix A, and must have a Data Universal Numbering System (DUNS) number. The grantee must also comply with provisions of the Federal Funding Accountability and Transparency Act, which includes requirements on executive compensation, and 2 CFR part 170 Reporting Subaward and Executive Compensation Information. Previous

grant agreements referred to these requirements by the names used in regulations prior to technical amendments in 2014 and 2015 that revised the nomenclature for the systems imposed by these regulations (i.e., eliminating older terms, "Central Contractor Registration," "System of Award Management" and "the Dun and Bradstreet Data Universal Numbering System (DUNS).").

7. Pursuant to the Notices identified in term 3 (above), the grantee is required to develop a needs assessment and amend its Action Plan as conditions change and additional needs are identified. In its action plan, grantees must also describe the connection between identified unmet needs and the allocation of CDBG-DR resources.

8. This grant agreement covers a total amount of **\$16,453,000.00**. The funds must be used to fund disaster recovery as defined in the grantee's HUD approved Action Plan. Funds must be expended by the grantee in accordance with the schedules below.

Absent a HUD approved extension, the grantee must expend grant funds within 24-months of the date on which the funds were obligated in accordance with the Cumulative Expenditure Schedule below. The Cumulative Expenditure Schedule identifies grant funds obligated by HUD, the 24-month expenditure deadline associated with each obligation, and the cumulative amount of grant funds that the grantee must expend by various deadlines in order to satisfy the 24-month expenditure deadline (the "Cumulative Disbursement Goals"). Expenditures for all activities that have not been granted an extension will be used toward meeting the Cumulative Disbursement Goals identified in the Cumulative Expenditure Schedule.

The grantee may request additional time to expend funds that have been obligated to the grantee in accordance with the *Federal Register* Notice published May 11, 2015, at 80 FR 26942 (amending procedures in prior notices), but no extensions will be granted allowing expenditure after September 30, 2022. Grantees are cautioned that draws may be restricted several days prior to the September 30, 2022, deadline to ensure compliance with this expenditure deadline.

If HUD approves an extension, extended funds will be deducted from the next applicable cumulative disbursement goal in the Cumulative Expenditure Schedule, and all successive cumulative disbursement goals, and the extended funds will be subject to a separate, extended expenditure deadline (the "Extended Expenditure Goal"), which will be indicated under the Extended Expenditure Schedule. Only expenditures for activities associated with the HUD approved extension will count toward the applicable Extended Expenditure Goal for each identified HUD approved extension.

Funds subject to de-obligation will also be deducted from the appropriate obligation in the Cumulative Expenditure Schedule and all successive Cumulative Disbursement Goals.

Substantial amendments are subject to the additional requirement of the applicable CDBG-DR Notices. Subsequent amendments to this grant agreement will obligate additional funds towards the grantee's full grant amount of \$16,453,000.00 or reflect funds that have been extended or are subject to de-obligation, as described above. The grantee may request additional funds by submitting a request to amend this grant agreement to the Department.

Jefferson Parish, Louisiana
Cumulative Expenditure Schedule

OBLIGATION ROUND	OBLIGATION DATE	EXPENDITURE DEADLINE	CUMULATIVE AMOUNT OF GRANT FUNDS THAT MUST BE EXPENDED BY DEADLINE
#1	3/13/2014	3/13/2016	\$338,595.00
#2	5/13/2015	5/13/2017	\$947,854.00
#3	2/4/2016	2/4/2018	\$2,416,230.00
#4	5/20/2016	5/20/2018	\$6,584,928.32
#5	8/14/2017	8/14/2019	\$16,453,000.00

ACTION PLAN-REVISED MAY 23, 2019

Jefferson Parish, Louisiana
Community Development Block Grant
Disaster Recovery
Hurricane Isaac Action Plan

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Executive Summary

On May 29, 2013, HUD issued FR -5696-N-03, notifying Jefferson Parish, Louisiana of an allocation of \$16,453,000.00 from the Disaster Relief Appropriations Act of 2013. Jefferson Parish will use this funding to address the outstanding needs that resulted from Hurricane Isaac, which struck Louisiana in August of 2012. Jefferson Parish Community Development Department (JPCD) will implement the programs outlined in this Action Plan. Jefferson Parish is committed to leveraging this funding to the greatest extent possible to serve the greatest population possible, with a particular focus on the historically underserved populations of the elderly and the disabled.

Jefferson Parish has participated with the State of Louisiana in identifying the unmet need of the Parish in accordance with the methodology outlined in FR -5696-N-01. The unmet need for Jefferson Parish is outlined in Figure 1.1.

Parish	Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
Jefferson	\$ 224,832,905.36	\$ (9,040,576.47)	\$ (5,301,004.11)	\$ (19,044,321.56)	\$ (26,705,200.00)	\$ 164,741,803.21

Based on the assessment of need, Jefferson Parish proposes to distribute the direct allocation according to Figure 1.2.

	HAP	ESP	EPO Infrastructure	Drainage Infrastructure
Activity	\$6,228,190	\$1,375,000	\$4,727,162	\$3,300,000
Administration	\$ 455,431	\$118,421	\$248,798	
Total	\$6,683,621	\$1,493,421	\$4,975,960	\$3,300,000

The Parish will focus its funding through four programs. First, in response to the overwhelming unmet need identified in the Parish, the majority of Program funding will be spent on low to moderate income homeowners who are either elderly or disabled. Because Jefferson Parish sustained substantial damage that was spread broadly throughout the community, the Homeowner Assistance Program (HAP) will focus on smaller repair funding.

Second, the Parish will engage in an Elevation Support Program (ESP) to assist homeowners who are interested in raising their homes to mitigate against future disasters. These funds may be used as match for the Hazard Mitigation Grant Program that is currently available for flood elevation assistance.

The Parish has identified that Hurricane Isaac overcame the existing sewage capacity and caused a backlog of sewage overrun in the Parish communities. The Parish proposes to address this infrastructure

deficiency through an Emergency Pump Out Instillation Initiative (EPO) that will serve all areas of the Parish.

In addition to the impacts on the sewer system, the parish will implement the Hurricane Isaac Drainage Improvement Program to address critical improvements to the drainage infrastructure to address impacts from Hurricane Isaac.

Diversity and Income Requirements

Jefferson Parish Community Development Department, as the grantee of the allocated federal funds is fully committed to awarding a contract(s) to firm(s) that will provide high-quality services and that are dedicated to diversity and to containing costs. Jefferson Parish Community Development Department strongly encourages the involvement of minority- and/or woman- owned business enterprise ("M/WBEs") to stimulate participation in procurement and assistance programs.

In addition to the above diversity requirements, and pursuant to Section 3 of the Housing & Urban Development Act of 1968, Jefferson Parish Community Development Department is committed to ensuring that employment and other economic opportunities generated by HUD financial assistance shall, to the greatest extent feasible, and consistent with existing federal, state and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

Lastly, Jefferson Parish is fully committed to using the funding through these programs to affirmatively further fair housing and to comply with all applicable federal, state and local regulations. In adherence to Jefferson Parish Ordinance 25063 relating to fair housing.

Introduction

On August 28th, 2012, Hurricane Isaac made landfall in Louisiana near the mouth of the Mississippi River almost exactly seven years after Hurricane Katrina. For nearly three days, Jefferson Parish was impacted by hurricane force winds, torrential rainfall, and flash flooding. The storm surge reached up to 11 feet in some areas of the State. Flooding overcame the drainage and sewage infrastructure, causing waste and water to back up into residences. Across the State, more than 600,000 households were without power, and nearly all of the Greater New Orleans Area was affected.

In Jefferson Parish, home to more than 400,000 people, the storm surge reached up to 6 feet. Jefferson Parish sustained the largest number of damaged homes from Hurricane Isaac in the State of Louisiana. 12,912 homes sustained storm damage according to FEMA's door-to-door inspections. The total estimated damage to the Jefferson Parish housing stock is over \$224 million. Of that damage dollar value, 63% occurred to households qualifying as low to moderate income population.

The population of Jefferson Parish desperately needs broad assistance in meeting the housing challenges still present from Hurricane Isaac and exacerbated by the lingering effects of the 2005 hurricane season. Additionally, the Parish leadership is looking forward to the next event. They know that they cannot afford to allow identified infrastructure weaknesses to be left unattended.

This Action Plan outlines Jefferson Parish's focused intention for its \$16,453,000 direct allocation. Because the allocation is limited, the Parish will concentrate its efforts in two areas. First, the Parish will strive to meet the unmet housing recovery needs of those residents who are historically underserved in disaster events: namely, the low to moderate income community, and especially the elderly and the disabled. The Parish believes that these residents bear the bulk of the burden of the unmet need still outstanding from Hurricane Isaac. The damage assessment shows the bulk of the need to be moderate repairs over a widespread area, and HAP is designed accordingly.

Secondly, the Parish has identified a deficiency in its sewage overflow capacity systems. During Isaac, the limited sewage processing capacity was overcome by the storm effects. This type of overflow directly impacts the entire Parish community and compounds the already devastating effects of any major storm event. The Parish has concluded that the limited capacity of the sewer systems caused sewage overflow harming residents throughout the Parish including historically underserved populations. The Parish will use part of its direct allocation to address these capacity issues in order to prevent the recurrence of the unsafe and unsanitary living conditions that resulted from sewage overflow in Hurricane Isaac.

Needs Assessment

The needs assessment activities of Jefferson Parish are the starting point of the method of distribution. It is the Parish's goal to ensure that the greatest number possible of traditionally underserved populations be addressed through the distribution of the direct allocation.

This needs assessment focuses primarily on the extent and nature of the housing damage and unmet need in the Parish. Housing unmet need is data that is more readily available to the Parish. Because the amount of allocation that the Parish has received is relatively small in proportion to the damage sustained and existing unmet need, the Parish chooses to focus almost exclusively on housing solutions.

Figure 3.1: Demographics – 2010 Census Data

RACE	
Total population	432,310
One race	425,121
Two or more races	7,189
One race	425,121
White	275,681
Black or African American	113,988
American Indian and Alaska Native	2,333
Cherokee tribal grouping	123
Chippewa tribal grouping	6
Navajo tribal grouping	0
Sioux tribal grouping	68
Asian	16,781
Asian Indian	1,492
Chinese	2,316
Filipino	1,357
Japanese	379
Korean	601
Vietnamese	8,868
Other Asian	1,768
Native Hawaiian and Other Pacific Islander	138
Native Hawaiian	0
Guamanian or Chamorro	114
Samoan	0
Other Pacific Islander	24
Some other race	16,200
Two or more races	7,189
White and Black or African American	1,864
White and American Indian and Alaska Native	1,237
White and Asian	1,206
Black or African American and American Indian and Alaska Native	803

HISPANIC OR LATINO AND RACE	
Total population	432,310
Hispanic or Latino (of any race)	50,761
Mexican	10,753
Puerto Rican	2,339
Cuban	3,385
Other Hispanic or Latino	34,284
Not Hispanic or Latino	381,549
White alone	245,520
Black or African American alone	111,850
American Indian and Alaska Native alone	1,703
Asian alone	16,582
Native Hawaiian and Other Pacific Islander alone	99
Some other race alone	480
Two or more races	5,315
Two races including Some other race	318
Two races excluding Some other race, and Three or more races	4,997

SEX AND AGE	
Total population	432,310
Male	209,567
Female	222,743
Under 5 years	28,138
5 to 9 years	25,660
10 to 14 years	26,796
15 to 19 years	27,529
20 to 24 years	29,381
25 to 34 years	59,971
35 to 44 years	55,765
45 to 54 years	65,887
55 to 59 years	29,721
60 to 64 years	25,087
65 to 74 years	30,919
75 to 84 years	19,762
85 years and over	7,694
Median age (years)	38.5
18 years and over	334,729
21 years and over	318,110
62 years and over	72,560
65 years and over	58,375
18 years and over	334,729
Male	159,854
Female	174,875
65 years and over	58,375
Male	24,177
Female	34,198

INCOME AND BENEFITS (IN 2011 INFLATION-ADJUSTED DOLLARS)	
Families	108,258
Less than \$10,000	5,366
\$10,000 to \$14,999	3,685
\$15,000 to \$24,999	9,737
\$25,000 to \$34,999	10,554
\$35,000 to \$49,999	15,424
\$50,000 to \$74,999	21,058
\$75,000 to \$99,999	15,950
\$100,000 to \$149,999	15,355
\$150,000 to \$199,999	5,753
\$200,000 or more	5,376
Median family income (dollars)	60,252
Mean family income (dollars)	78,548

HOUSING OCCUPANCY	
Total housing units	188,266
Occupied housing units	165,404
Vacant housing units	22,862
Homeowner vacancy rate	2.4
Rental vacancy rate	10.3

The housing stock in Jefferson Parish leans heavily towards single family homeowners. While a high rental vacancy rate exists, the demand is for traditional home ownership.

Housing Damage

Figure 3.2: Real Property Damage Estimation (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	10,581	\$ 7,759,778.94	22.57	\$ 175,113,984.14
Minor-High	791	\$ 3,620,095.36	7.13	\$ 25,801,522.95
Major-Low	197	\$ 2,161,734.48	5.26	\$ 11,360,615.31
Major-High	159	\$ 2,690,752.79	3.78	\$ 10,168,879.94
Severe	34	\$ 916,530.95	2.61	\$ 2,387,923.03
Total	11,762	\$ 17,148,892.52		\$ 224,832,905.36

Figure 3.3: Real Property Damage
Estimation for LMI Households (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	6,730	\$ 4,910,263.30	22.57	\$ 110,809,299.86
Minor-High	496	\$ 2,289,317.55	7.13	\$ 16,316,663.91
Major-Low	126	\$ 1,409,429.23	5.26	\$ 7,407,007.40
Major-High	93	\$ 1,637,984.47	3.78	\$ 6,190,262.99
Severe	19	\$ 557,348.75	2.61	\$ 1,452,112.35
Total	7,464	\$ 10,804,343.30		\$ 142,175,346.51

Insurance Damage Estimations

Figure 3.4: Real Property Damage Estimation for Flooded LMI Households w/ No FI. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	189	\$ 238,048.56	22.57	\$ 5,372,012.18
Minor-High	88	\$ 441,703.18	7.13	\$ 3,148,153.18
Major-Low	42	\$ 486,547.85	5.26	\$ 2,556,966.64
Major-High	38	\$ 644,363.09	3.78	\$ 2,435,173.87
Severe	6	\$ 109,663.81	2.61	\$ 285,717.29
Total	363	\$ 1,920,326.49		\$ 13,798,023.17

Figure 3.5: Real Property Damage Estimation for Non-Flooded LMI Households w/ No Haz. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	2,014	\$ 1,439,106.61	22.57	\$ 32,476,139.49
Minor-High	133	\$ 585,195.09	7.13	\$ 4,170,863.76
Major-Low	21	\$ 220,622.24	5.26	\$ 1,159,441.37
Major-High	6	\$ 113,967.98	3.78	\$ 430,707.24
Severe	4	\$ 144,934.96	2.61	\$ 377,612.48
Total	2,178	\$ 2,503,826.88		\$ 38,614,764.35

Figure 3.6: Real Property Damage Estimation for All Flooded Households w/ No Fl. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	246	\$ 309,991.07	22.57	\$ 6,995,529.84
Minor-High	107	\$ 542,058.46	7.13	\$ 3,863,415.85
Major-Low	57	\$ 639,743.99	5.26	\$ 3,362,062.01
Major-High	58	\$ 910,247.09	3.78	\$ 3,440,001.40
Severe	9	\$ 161,845.78	2.61	\$ 421,671.81
Total	477	\$ 2,563,886.39		\$ 18,082,680.91

Figure 3.7: Real Property Damage Estimation for All Non-Flooded Households w/ No Haz. Ins. (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	2,513	\$ 1,791,660.24	22.57	\$ 40,432,173.32
Minor-High	165	\$ 721,629.89	7.13	\$ 5,143,276.16
Major-Low	24	\$ 249,682.42	5.26	\$ 1,312,162.04
Major-High	7	\$ 130,912.33	3.78	\$ 494,743.24
Severe	4	\$ 144,934.96	2.61	\$ 377,612.48
Total	2,713	\$ 3,038,819.84		\$ 47,759,967.25

Unmet Housing Need

The unmet housing need in Jefferson Parish directly attributed to Hurricane Isaac is staggering. Jefferson Parish has more unmet housing need than any other Parish in Louisiana at \$164,741,803.21. This is after a consideration of FEMA Individual Assistance, SBA Housing Loans, and paid hazard and flood insurance claims.

Parish	Est. Damage	Haz. Payout in IA	Adj. NFIP Payout	FEMA IA Assistance	SBA Home Loans	Unmet Need
Jefferson	\$ 224,832,905.36	\$ (9,040,576.47)	\$ (5,301,004.11)	\$ (19,044,321.56)	\$ (26,705,200.00)	\$ 164,741,803.21

Figure 3.8 is representative of the State of Louisiana's calculation of Unmet Need based on the required methodology of Federal Registry FR-5696-N-01. The unmet need is calculated in consideration of FEMA Individual Assistance program inspections and SBA disaster assistance loan program for housing repair and replacement inspections. Unmet need is the number of housing units with unmet need times the estimated cost to repair those units less repair funds provided by FEMA. Each FEMA inspection is assigned a damage value as follows:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 1 to 4 feet of flooding on the first floor.
- Severe: Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 4 or more feet of flooding on the first floor.

The required calculation for estimated damage based on the above full verified damage levels is shown in Figure 3.9.

Figure 3.9: Real Property Damage Estimation (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	10,581	\$ 7,759,778.94	22.57	\$ 175,113,964.14
Minor-High	791	\$ 3,620,095.36	7.13	\$ 25,801,522.95
Major-Low	197	\$ 2,161,734.48	5.26	\$ 11,360,615.31
Major-High	159	\$ 2,690,752.79	3.78	\$ 10,168,879.94
Severe	34	\$ 916,530.95	2.61	\$ 2,387,923.03
Total	11,762	\$ 17,148,892.52		\$ 224,832,905.36

Based on this calculation, the State of Louisiana and Jefferson Parish have determined the estimated real property damage of low to moderate income households to be \$142,175,346.51. That calculation is demonstrated in Figure 3.10.

Figure 3.10: Real Property Damage Estimation for LMI Households (Jefferson)

Dmg. Level	# Damaged	Total FVL	Multiplier	Damage Est.
Minor-Low	6,730	\$ 4,910,263.30	22.57	\$ 110,809,299.86
Minor-High	496	\$ 2,289,317.55	7.13	\$ 16,316,663.91
Major-Low	126	\$ 1,409,429.23	5.26	\$ 7,407,007.40
Major-High	93	\$ 1,637,984.47	3.78	\$ 6,190,262.99
Severe	19	\$ 557,348.75	2.61	\$ 1,452,112.35
Total	7,464	\$ 10,804,343.30		\$ 142,175,346.51

Given the overwhelming damage sustained by Jefferson Parish low to moderate income families, especially relative to the estimated unmet need shown in Figure 3.8, the Parish considers its top housing priority to be meeting the unmet needs of low to moderate income families.

Infrastructure Status

FEMA Public Assistance Cost Status

Infrastructure addressed by FEMA is through its Public Assistance (PA) program. FEMA meets public infrastructure needs through a series of cost categories. The current status of the Jefferson Parish public infrastructure cost allocation for FEMA is outlined in Figure 3.1.

Category A – Debris Removal	100% of Eligible Cost	100% of Pending Cost
	\$ 9,566,664.71	\$ 50,000.00
Category B - Emergency Measures	100% of Eligible Cost	100% of Pending Cost
	\$ 20,905,856.76	\$ 1,678,589.85
Category C - Roads and Bridges	100% of Eligible Cost	100% of Pending Cost
	\$ 251,625.32	\$ 115,000.00
Category D - Water Control Facilities	100% of Eligible Cost	100% of Pending Cost
	\$ 94.00	
Category E - Buildings and Equipment	100% of Eligible Cost	100% of Pending Cost
	\$ 6,791,840.23	\$ 1,843,227.37
Category F - Utilities	100% of Eligible Cost	100% of Pending Cost
	\$ 1,818,090.76	\$ 100,000.00
Category G - Parks, Recreation and Other Facilities	100% of Eligible Cost	100% of Pending Cat G
	\$ 767,195.68	\$ 230,000.00
Total	\$ 40,101,367.46	\$ 4,016,817.22

Figure 3.12: FEMA Public Assistance Cost Share for Jefferson Parish

Debris	25% Cost Share
	\$ 2,391,666.18
Emergency Measures	25% Cost Share
	\$ 5,226,464.19
Roads and Bridges	25% Cost Share
	\$ 62,906.33
Water Control Facilities	25% Cost Share
	\$ 23.50
Buildings and Equipment	25% Cost Share
	\$ 1,697,960.06
Utilities	25% Cost Share
	\$ 454,522.69
Parks, Recreation and Other Facilities	25% Cost Share
	\$ 191,798.92
Total	\$ 10,025,341.87

Sewage System Capacity

The infrastructure strains of the storm's impact were felt Parish-wide. Storm drains and sewer lines were stressed due to high inflow and infiltration (I&I), streets flooded due to heavy rainfall, and power was lost throughout the Parish in some areas for as long as three weeks. During this time, Jefferson Parish experienced a multitude of sanitary sewer overflows (SSOs) at many of its sewerage lift stations throughout the Parish. Sanitary sewer overflows during and following the storm occurred at sewerage lift stations that lost power, in which case the pumps did not turn on to pump out sewerage.

The SSOs that occurred in Jefferson Parish during Hurricane Isaac were a result of power outages. Once a sewerage lift station loses power the station can no longer pump sewerage out of the wet well. As residents continue to use water and deliver wastewater to the system, the pump station wet well continues to fill until it eventually overflows. Along with locally generated overflows, systematic overflows were common during Hurricane Isaac as a result of stations which still had power pumping into stations which had lost power.

Improvements are continuously implemented to the Jefferson Parish Sewerage System through the Sewer Capital Improvement Program (SCIP). Many improvements have been made through SCIP to improve the capabilities of the system to operate during hurricanes. Primarily, sewer force mains and pump stations have been upgraded to increase capacity and generators have been installed at critical lift stations so that the system can continue to operate during power outages. However, budget constraints restrict the number of lift stations that can be upgraded, and many lift stations still will not be upgraded through the program.

Additional outstanding damage projects that the Parish hopes to address with future funding include:

- Rosethorne Wastewater Treatment Plant – Approximately 1,200 feet of levee need to be raised to an elevation of +9. Estimated cost of \$500,000.
- Helios Sewer Pump Station Generator – Installation of one 1,250 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$1 million.
- Camp Plauche Sewer Pump Station Generator – Installation of one 2,000 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$1.6 million.
- Terrytown II Sewer Pump Station Generator – Installation of one 1,000 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$750,000.
- Ames & Mayronne Sewer Pump Station Generator – Installation of one 2,000 kW generator (with ATS) to operate the station during emergency power failure. Estimated cost of \$1.6 million.

Drainage Impacts

In addition to the sewer system, the impacts of Hurricane Isaac on the Parish's drainage infrastructure were widespread throughout the parish concentrating mainly on the hardest hit areas of the parish, the westbank including the Crown Point, Barataria, and the Town of Jean Lafitte.

On August 29, 2012 as Hurricane Isaac approached, the storm surge and heavy rains flooded most of the Lafitte area. Entergy power was lost, and the auto switchover system at each pump station engaged and the power source transferred to generator power. During the event many of the drainage pump station's discharge water levels had reached a point of pump recirculation (when water from pump discharge circulates back to the pump suction side).

During the first and second day of this event the Drainage personnel were unable to access many of the pump stations due to high winds and water. After the winds had diminished and higher roadways became accessible – the Drainage Department could access the impacted drainage stations with high water vehicles.

The issues encountered in these areas were related to high water and heavy rain. Some of the pump motors were inundated with water and became nonfunctional either during the storm or within a few days after. There was also high water that prohibited access to the stations to make repairs and/or fuel the generators. In addition, the heavy rainfall, inadequate drainage lines were impacted limiting pump station capacity which contributed to the flooding and delayed the subsequent de-watering of the area. These drainage lines caused a significant portion of the long term impacts not only to the stations, but directly to these communities.

Economic Impact

In consideration of the extreme focus necessary for the direct allocation, Jefferson Parish does not consider economic impact to be a priority for distribution of funds. Over \$142 million in unmet need for low to moderate income households is still outstanding as a result of Isaac. The Parish must focus its resources to address housing need.

Method of Distribution

Based on the assessment of unmet needs, the Parish decided to focus on two areas of recovery: providing funding for minor home repairs and home elevation match payments for the low income homeowners who have been affected, and shoring up the infrastructure needs to ensure that the costs born from the lack of sewage capacity demonstrated in Isaac are not carried forward into future disasters.

Both of these activities meet the criteria of 24 CFR 570.483 and are activities benefiting low and moderate income families and meeting an urgent need of the Parish in response to Hurricane Isaac. The single family housing activities performed by the Parish will have a prioritization for households with income at or below 80% of the area median family income, have a disabled member of the family, and are located in Lafitte areas. The sewage capacity activities of the Parish will repair the areas damaged by the impacts of Hurricane Isaac.

The overall method of distribution for the allocation can be found in Figure 4.1.

	HAP	ESP	EPO Infrastructure	Drainage Infrastructure
Activity	\$6,228,190	\$1,375,000	\$4,727,162	\$3,300,000
Administration	\$ 455,431	\$118,421	\$248,798	
Total	\$6,683,621	\$1,493,421	\$4,975,960	\$3,300,000

Housing

As demonstrated in the unmet needs assessment section of this action plan, the majority of Jefferson Parish residents live in traditional single family houses and are homeowners. Therefore, the Parish will use the majority of its direct allocation to assist single family homeowners through HAP. The primary focus of HAP will be to address the minor home repair needs of the parish with a prioritization for low-to-moderate income households and households with elderly or disabled members whose homes were damaged by Isaac.

Total HAP Allocation: \$6,683,621

Maximum Unit Award:
\$60,000

Estimated Number of Units Served

The final number of units served will depend on the demonstrated actual repair estimates, and the accounting of the benefits previously received for repairs for each household.

Applicant Eligibility

HAP will be available to all Hurricane Isaac impacted residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac, at the time of application to the program and at the time of program award. Additionally, prioritization will be given to those applicants whose household income is at or below 80% of the Area Median Family Income and have elderly or disabled household members and are located in the defined Lafitte area.

Eligibility Criteria

- Homeownership at the time of Isaac
- Homeownership at the time of application and funding
- Primary residence at the time of Hurricane Isaac
- Unrepaired home damage the resulted from Hurricane Isaac
- Current on Parish property taxes
- Flood insurance must have been maintained on the property at the time of the event if the homeowner received federal disaster assistance for the property related to a prior event

Program Requirements

Prior to closeout of each grant award, homeowners will be required to provide to evidence to the parish of hazard and flood insurance on the property for the value of the property.

Program Priority Applicants

HAP will prioritize applicants in three tiers based on the priorities stated in the unmet needs section of this Action Plan and outlined below. Prioritization will be given to the following groups within each tier:

- Elderly member of household (62 and over). Age will be determined as of December 31, 2012.
- Special needs or disabled member of household. Person must have been determined disabled as of December 31, 2012.
 - For purposes of this prioritization, disabled is
 - (1) an individual disabled according to Medicaid standards or the Social Security Administrations' disability criteria, which includes a finding that an individual cannot do work that he/she did before; that and individual cannot adjust to other work because of his/her medical condition(s); and the disability has lasted or is expected to last for at least one year or to result in death.; and,
 - (2) an individual that receives a monthly benefit from a government agency as a result of the disability.
- Households located in the defined Jean Lafitte area.
 - For purposes of this prioritization the Jean Lafitte area is defined as representative of areas south of the intersection of Barataria Blvd and LA 3134 S.

Below outlines the prioritization within each tier.

Tier I:

- **Tier I (a):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is located in the designated Jean Lafitte area.
- **Tier I (b):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.

Tier II:

- **Tier II (a):** Households whose income is 80% or below AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier II (b):** Households whose income is 80% or below AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

Tier III:

- **Tier III (a):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is located in the designated Jean Lafitte area.
- **Tier III (b):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.
- **Tier III (c):** Households whose income is 81% or above AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier III (d):** Households whose income is 81% or above AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

National Objective:

In accordance with 24 CFR 570.483, HAP will meet the following national objectives:

- Activities benefiting low and moderate income persons
- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Elevation Support Program

A significant consideration of Jefferson Parish is to meet the increasingly prohibitive demands of flooding within in the Parish. The Parish is repeatedly impacted by of flooding during major events due to the relatively low elevation of the Parish and the lack of funding needed to properly elevate the existing housing stock, especially in relation to low to moderate income families.

The Parish has an existing Hazard Mitigation Grant Program (HMGP) that is able to provide assistance to families in need of support to elevate existing properties to safe and secure levels. This program is a strong initiative within the Parish, and is targeted towards meeting the needs of families who desperately want to responsibly elevate but who cannot afford it. However, the program requires a match from the Hazard Mitigation Program in order for home owners to participate.

The ESP will provide up to \$30,000 in elevation support to applicants who meet the eligibility criteria outlined below. The goal of the program is to elevate a home up to the most current floodplain standards as determined by the Jefferson Parish Department of Hazard Mitigation in order to repair existing unmet need damage and in order to prevent future impact through responsible mitigation. In the event that the amount of funding available through ESP will not completely elevate the home, program participants will be required to demonstrate that they are able to provide the balance in funding necessary to completely elevate the home through participation in HMGP. ESP may be joined with HAP in order to provide funding for both repair and elevation.

Total ESP Allocation: \$1,493,421

Maximum Unit Award: \$30,000

Estimated Number of Units Served:

The final number of units served will depend on the demonstrated actual elevation costs and calculation of previous benefits received by each household.

Applicant Eligibility

ESP will available to all Hurricane Isaac impacted residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac, at the time of application to the program and at the time of program award. Additionally, prioritization will be given to those applicants whose household income is at or below 80% of the Area Median Family Income, have elderly or disabled household members, and are located in the defined Lafitte area.

Eligibility Criteria

- Homeownership at the time of Isaac
- Homeownership at the time of application and funding
- Primary residence at the time of Hurricane Isaac
- Unrepaired home damage the resulted from Hurricane Isaac

- Current on property taxes
- Flood insurance must have been maintained on the property at the time of the event if the homeowner received federal disaster assistance for the property related to a prior event

Program Requirements

Prior to closeout of each grant award, homeowners will be required to provide to evidence to the parish of hazard and flood insurance on the property for the value of the property.

Program Priority Applicants

ESP will prioritize applicants in three tiers based on the priorities stated in the unmet needs section of this Action Plan and outlined below. Prioritization will be given to the following groups within each tier:

- Elderly member of household (62 and over). Age will be determined as of December 31, 2012.
- Special needs or disabled member of household. Special needs or disabled member of household. Person must have been determined disabled as of December 31, 2012.
 - For purposes of this prioritization, disabled is
 - (1) an individual disabled according to Medicaid standards or the Social Security Administrations' disability criteria, which includes a finding that an individual cannot do work that he/she did before; that and individual cannot adjust to other work because of his/her medical condition(s); and the disability has lasted or is expected to last for at least one year or to result in death.; and,
 - (2) an individual that receives a monthly benefit from a government agency as a result of the disability.
- Households located in the Jean Lafitte area.
 - For purposes of this prioritization the Jean Lafitte area is defined as representative of areas south of the intersection of Barataria Blvd and LA 3134 S.

Below outlines the prioritization within each tier.

Tier I:

- **Tier I (a):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is located in the designated Jean Lafitte area.
- **Tier I (b):** Households with elderly or disabled members whose income is 80% or below AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.
- **Tier I (c):** Households with expiring federal funding, more specifically with FEMA funds.

Tier II:

- **Tier II (a):** Households whose income is 80% or below AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier II (b):** Households whose income is 80% or below AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

Tier III:

- **Tier III (a):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is located in the designated Jean Lafitte area.

- **Tier III (b):** Households with elderly or disabled members whose income is 81% or above AMI and the damaged home is in an area of the parish outside of the defined Jean Lafitte area.
- **Tier III (c):** Households whose income is 81% or above AMI and whose damaged home is in the defined Jean Lafitte area.
- **Tier III (d):** Households whose income is 81% or above AMI and whose damaged home is area of the parish outside of the defined Jean Lafitte area.

National Objective:

In accordance with 24 CFR 570.483, ESP will meet the following national objectives:

- Activities benefiting low and moderate income persons
- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Infrastructure

In order to address the Parish's primary infrastructure concern of sewage pump capacity, the Parish will implement an Emergency Pump Out (EPO) installation initiative. This initiative will be directed by the Jefferson Parish Department of Sewerage. Emergency Pump Outs (EPOs) will be installed or current EPOs will be upgraded on the lift stations so that temporary pumps can move flow through the lift station. An EPO is a small modification which can be placed on the piping of the lift station and allow for quick connection to a temporary backup pump that can be delivered to the station. If a lift station is not equipped with an EPO, the only method of removing wastewater from the station is through the use of vacuum trucks which are inefficient and labor intensive.

Project Total Allocation: \$ 4,975,960

Currently there are 516 lift stations throughout Jefferson Parish and 273 of these lift stations are not equipped with an EPO. In addition, electricity was lost at 86% of lift stations on the West Bank and 54% of lift stations on the East Bank. As a result, vacuum trucks and other bypass pumping methods were required to remove sewerage from lift stations, costing Jefferson Parish \$4,953,534 in vacuum truck services and a total of \$6,072,871 in pumping and hauling, including vacuum truck services. This cost does not include additional time and labor required of Jefferson Parish Department of Sewerage employees during Hurricane Isaac.

To reduce SSOs and associated costs during future emergencies, the Jefferson Parish Department of Sewerage proposes to install EPOs on as many lift stations as possible throughout the parish. Additionally, the Parish will also modify existing EPOs, which will include the replacement of undersized EPOs with higher capacity EPOs and to relocate inaccessible EPOs to accessible locations.

The current practice of using vacuum trucks is both costly and inefficient. Installing and modifying EPOs at more sewerage lift stations throughout the Parish would greatly reduce the cost of eliminating SSOs at

lift stations during hurricanes and other times of emergency. In addition, the Department of Sewerage would be better prepared to alleviate SSOs at lift stations during these times and quickly restore service to residents.

If the Parish at any time feels that it is in jeopardy of meeting 50% overall benefit requirement, the Parish will need to separate the project into an LMI activity and an Urgent Need activity.

National Objective:

In accordance with 24 CFR 570.483, EPO Instillation Initiative will meet the following national objectives:

- Activities a Low to Moderate Area benefit
- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Drainage Improvement Program

Total Project Allocation: \$3,300,000

As the parish continues to rebuild after Hurricane Isaac, the parish must invest in the infrastructure of the vulnerable communities impacted by Hurricane Isaac. The parish understands that the critical drainage and sewerage infrastructure is the backbone to a resilient community, and is necessary to rebuild from the impacts of Hurricane Isaac, and prepare for future storms. Through the Drainage Improvement Program, the parish will work directly with the Jefferson Parish Drainage Department and local municipalities such as the Town of Jean Lafitte to address critical drainage infrastructure needs as a result of Hurricane Isaac.

The Program will consist of the design and implementation of critical drainage improvements on the west bank of the parish including the areas heavily impacted by Hurricane Isaac such as Crown Point, Barataria, and the Town of Jean Lafitte. The Parish anticipates completing up to six drainage specific projects with CDBG-DR funding. The projects will consist of the following critical infrastructure improvements.

- Critical repairs and mitigation to sewerage/drainage stations and substations including elevating and hardening of infrastructure and critical repairs to the stations which were inaccessible during Hurricane Isaac.
- Drainage and subsurface improvements to strategic areas which suffered inundation of water and wind impacts from Hurricane Isaac.
- All drainage improvements will utilize drainage materials which will increase the drainage capacity by up to 30%. This increase will remediate the impacts from Hurricane Isaac, as well as mitigate for future disasters.

All repairs shall be completed to withstand a 10-year storm event in accordance with Jefferson Parish standards, and the drainage shall be tied into the existing drainage system.

National Objective: In accordance with 24 CFR 570.483, The Drainage Improvement Program will meet the following national objectives:

- Activities a Low to Moderate Area benefit

- Activities benefiting an urgent need of the community as a result of Hurricane Isaac

Performance Metrics

Jefferson Parish is committed to assisting residents impacted by hurricane Isaac in the most expedient way possible. The storm events of the past decade have left Louisianans with a keen awareness of the inevitability of another hurricane in the future. Therefore, the repair and mitigation measures outlined in this plan will be implemented in accordance with all the regulations imposed by PL 113-2.

The Parish is working to finalize the procurement of a contractor to provide assistance in implementing HAP and ESP. Additionally, the parish is continually working to improve the program guidelines for implementation. Furthermore, all HAP and ESP funds must be committed by September 30, 2017, and expended with in the requirements outlined in the regulations.

Construction Standards

Jefferson Parish is committed to building safe, sanitary housing that is focused on green standards and sustainability. Louisiana has adopted as its building standard the 2009 International Residential Code and subsequent editions, which is focused on the most up-to-date regulations for durability and high quality. All Program housing activities will be built to this standard. Jefferson Parish encourages that HAP funded housing will be built in consideration of ENERGY STAR and LEED best practices for efficiency, sustainability and place-making. Furthermore, all elevation activities will meet or exceed the Advisory Base Flood Elevation standards for Jefferson Parish in an effort to protect against sea level rise.

Priority Needs for Elderly and Disabled Population

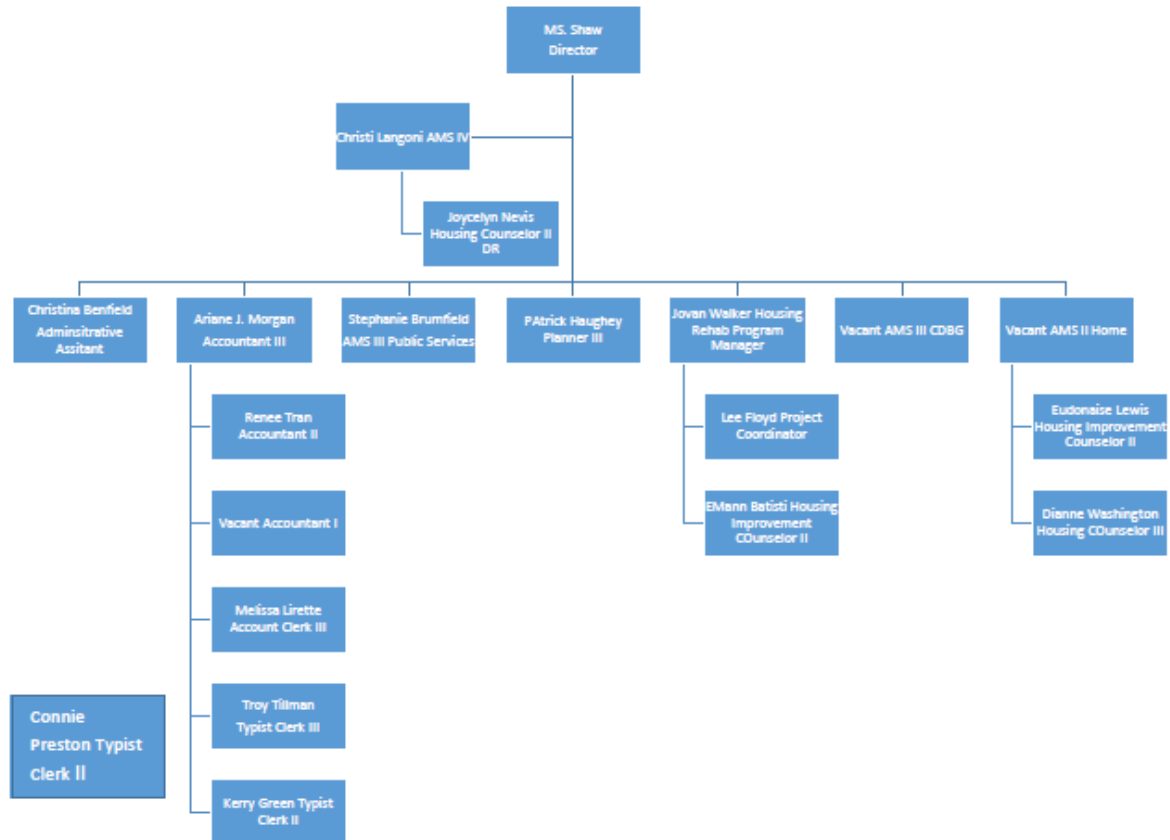
Jefferson Parish's primary focus for the disaster recovery allocation of funding is to assist those low to moderate income residents who experienced damage from Isaac, especially those who are either elderly or are living with a disability. The Parish will focus its efforts on supporting these special needs populations.

The Parish believes that the proper execution of its HAP and ESP as outlined in the Method of Distribution will serve to strengthen the housing stock, and provide resilient housing for Hurricane impacted Parish residents.

Administration and Monitoring

JPCD will be the primary administrative entity for the Community Development Block Grant – Disaster Recovery funds, and will be in charge of ensuring that Program requirements and eligibility standards are met. JPCD will partner with other departments within the parish to ensure the efficient implementation the disaster recovery programs. The Department of Sewerage will be responsible for the daily administration of the infrastructure portion of the allocation, it will report to the Community Development Department for overall oversight of the funding. Additionally, ESP will be administered in coordination with the FloodPlain Management and Hazard Mitigation Department.

The organizational chart of JPCD is shown in Figure 8.1. In order to meet the needs of the Program activities outlined in the Method of Distribution, the Community Development Department hired additional staff, including an administrative management specialist IV whose sole charge will be the administration of the Program. Furthermore, Jefferson Parish Community Development is finalizing a contract with a firm to conduct program management of HAP and ESP.



JPCD has engaged a technical assistance provider to ensure that the CDBG-DR is administered with the absolute minimum of waste and maximum of efficiency.

JPCD will work with the Jefferson Parish Internal Audit Department to ensure that programs are implemented in accordance with federal, state and local guidelines.

Through third party contractors and JPCD staff, a CDBG-DR monitoring plan will be designed and implemented and will include a uniform risk assessment assess all activities. Based on the risk assessment, JPCD will conduct desk and site reviews as called for by the monitoring plan. All housing units served by the Program will be monitored at least once during the life of the program.

JPCD will consult with technical assistance consultants to make streamline the monitoring approach in order to prevent any waste from occurring in the monitoring of Program expenditures.

Program Income

In accordance with 24 CFR 570.489, any income generated by the activities herein described will be distributed through HAP, ESP or EPO to increase the number of residents served in the respective program which generated the program income. At this time, Jefferson Parish does not anticipate generating any program income from Hurricane Isaac programs.

Preventing Fraud, Waste and Abuse

Jefferson Parish is ready to ensure that the allocation for disaster recovery is spent for its intended purpose. JPCD will ensure that the Department of Sewerage, Department of Floodplain Management and Hazard Mitigation meet the required internal controls of all disaster administration processes and policies. JPCD will revise and implement new policies and procedures at the recommendation of the Internal Audit division, HUD and the State of Louisiana.

The Parish will adhere to the conflict of interest provisions referenced at 24 CFR 570.611

JPCD along with third party contractors, will focus preventing fraud, waste and abuse for both HAP and ESP, by ensuring a verification of applicant documents. When applicable, the parish will work with internal departments or third party entities to verify documents submitted by applicants.

Given the extreme focus needed to maximize the Isaac allocation, the Parish cannot afford to lose any of its funding to waste or negligence. Jefferson Parish is completely committed to appropriate oversight and will do everything within its power to ensure that disaster recovery funding is allocated and spent appropriately. Additionally, JPCD is committed to work with the Internal Audit division to ensure that programs are monitored regularly and all applicable federal, state and local laws are followed.

Substantial Changes to the Action Plan

The following occurrences will require a substantial amendment to this Action Plan.

- Change in Program Benefit or Eligibility Criteria
- A new allocation or reallocation of more than \$1,000,000.00
- The addition or deletion of an activity

A substantial amendment to this Action Plan will be posted for public comment and subject to public hearings in the same nature as this original Action Plan and as required in the Federal Register Notices which pertain to PL-113-2.

Citizen Participation Plan

In accordance with Federal Register 14329 published March 5, 2013, the Citizen Participation Waiver and Alternative requirement was streamlined to waive the mandate of public hearings and to allow seven (7) days for citizen comment and ongoing citizen access to information about the use of grant funds.

Appendix A – Community Participation

In order to incorporate public comment as much as possible, Jefferson Parish hosted two public meetings to present this Action Plan to the Parish residents. Both meetings were held on August 22, 2013. The meeting times and locations were:

East Bank
Jefferson Parish
Joseph S. Yenni Building
1221 Elmwood Park Blvd., Suite 405
Jefferson, LA 70123
8/22/13 – (10:00 a.m. – Noon)

West Bank
Jefferson Parish
General Government Building
200 Derbigny Street – (Council Chambers)
Gretna, LA 70053
8/22/13 – (2:00 p.m. – 5:00 p.m.)

The public meetings were advertised in the Times-Picayune on August 16, 2013.

In order to solicit comment from as wide an audience as possible, Jefferson Parish also posted a draft of the Action Plan on the Parish website. The Action Plan was posted for public comment on August 13, 2013.

Finally, the Action Plan was reviewed and ratified by the Parish council on August 26, 2013 pursuant to Resolution No. 121492. At this council meeting, the floor was opened for comments on the Action Plan.

No comments were provided to the Parish regarding this Action Plan. The Parish considers the relative lack of public comment to be consistent with prior participation in similar comment opportunities. For example, the Parish's FY 2013 Action Plan comment period also received a similar lack of public participation.

In order to ensure that the Isaac Action Plan was in accordance with Public Law 113-2, public comments were solicited in the local newspapers, more specifically, the Advocate on July 4 and 7, 2016 and the Times-Picayune on September 7, 2016. Jefferson Parish also posted a draft of the Amended Action Plan on the Parish website. Public meetings were held on July 27, 2016 and September 21, 2016 at the Jefferson Parish Council meetings. The amendments to the Isaac Action Plan were reviewed and ratified by the Parish Council on September 21, 2016 pursuant to Resolution No. 127927. At this Council meeting, the floor was opened for public comment and no comments were received. Also, no comments have been received from the initial public notice in which the public comment period ended August 5, 2016.

In order to ensure that the Isaac Action Plan was in accordance with Public Law 113-2 for Action Plan Amendment 4 (substantial), public comments were solicited in the local newspapers, more specifically, the Times-Picayune on May 26, 2017 and online May 25-28, 2017. Public comments were also solicited on the Parish website on May 23, 2017 and a draft of the Amended Action Plan was also posted. The

amendments to the Isaac Action Plan were reviewed and ratified by the Parish Council on May 24, 2017 pursuant to Resolution No. 129314. Although no public meetings are required to be held in accordance with Public Law 113-2, at this Council meeting, the floor was opened for public comment and no comments were received. Also, no comments have been received from the public notice which is scheduled to end May 31, 2017.

Representation of the Parish's disaster recovery action plan public comment posting, as well as examples of historic public participation offerings, are provided in this Appendix on the following pages. Additionally, a copy of the Parish council's adoption of this Action Plan is also provided.

Appendix B – Maps

ATTACHMENT C

HUD MONITORING REPORT – RECEIVED SEPT 13, 2019



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

New Orleans Field Office
Hale Boggs Federal Building
500 Poydras Street, 9th Floor
New Orleans, LA 70130-3099

OFFICE OF COMMUNITY PLANNING & DEVELOPMENT

SEP 7 2018

Tamithia Shaw
Community Development Director
Jefferson Parish
1221 Elmwood Park Blvd., Suite 605
Jefferson, LA 70123

Dear Ms. Shaw:

Thank you for the time you and your staff spent with HUD representative, Keesha Broussard, during the July 18-19, 2018 on-site monitoring visit of the Parish's supplemental appropriations under the Community Development Block Grant Disaster Recovery (CDBG-DR) program. The objective of the review was to determine if the Parish is carrying out its CDBG-DR action plan for grant number B-13-US-22-0001 in accordance with all applicable regulations, Office of Management and Budget (OMB) circulars, as well as the pertinent Federal Register Notices and waivers, as applicable.

In order to make a determination relative to compliance with the aforementioned regulations, circulars and applicable Federal Register notices and waivers, staff interviews were conducted and sampling of project files with supporting documentation were reviewed. The results of our review were discussed during the exit conference on July 19, 2018. We have enclosed the report summarizing the findings and/or concerns resulting from this visit. A finding is a deficiency in the program's performance based on statutory requirements for which sanctions or other corrective actions are authorized. A concern is a deficiency in the program's performance not based on statutory or regulatory requirements that, if left uncorrected, could become a finding. HUD may provide recommended actions as a means of assisting you to improve the effectiveness of your program. The monitoring review resulted in one (1) finding and no concerns. Please respond to the finding within thirty (30) days of the date of this letter.

Please note the finding(s) and observations outlined in this report are indicative of the status of the Parish's grant at that point in time and does not reflect the current status of the grant number B-13-US-22-0001. We appreciate the courtesies extended and cooperation given by the members of your staff and look forward to our continued partnership. If you have any questions, please contact Keesha Broussard at (504) 671-3011 or Keesha.S.Broussard@hud.gov.

Sincerely,

Cheryl S. Breaux, Director
Office of Community Planning and Development

Enclosure



**U.S. Department of Housing & Urban Development
New Orleans Field Office**



**Monitoring Report
Community Development Block Grant
Disaster
Recovery Program
(CDBG-DR)**

Jefferson Parish

July 18-19, 2018

INTRODUCTION

HUD conducts management reviews, in conjunction with monitoring visits, to ensure that its programs are carried out efficiently, effectively, and in compliance with applicable laws, regulations, and established policy. These reviews are intended to assist grantees in improving performance, developing or increasing capacity, and augmenting management and technical skills. A management review is not limited to a one-time evaluation but is part of an on-going process that assesses the quality of a grantee's performance over a period of time and requires effective communication and cooperation between Federal, State, and local partners.

From July 18-19, 2018, HUD conducted an on-site monitoring review of Jefferson Parish's management of the Community Development Block Grant Disaster Recovery (CDBG-DR) supplemental appropriations. The review was conducted at Jefferson Parish's government office in Harahan, Louisiana. The Parish's designated entity to administer the CDBG-DR appropriation is the Department of Community Development. This report presents the results of the monitoring review and notes when technical assistance was provided.

Jefferson Parish has received a direct allocation of CDBG-DR funds under Public Law 113-2 in the amount of \$16,453,000 for recovery from Hurricane Isaac in 2013. The Action Plan associated with Public Law 113-2 has been approved and Jefferson Parish is working to carry out its approved activities.

SCOPE OF REVIEW

The following areas of grant management were reviewed with regard to the identified programs or sub grantees:

- Overall Management
 - Grant management and staff capacity
 - Review of DRGR and public website compliance
 - Compliance of Public Law 113-2 requirements
 - Review of overall program progress and project schedules
- Procurement
 - Procurement checklists and forms
 - Coordination of Parish departments carrying out CDBG-DR programs
- Technical Assistance for Public Law 113-2

The monitoring review was conducted by Keesha Broussard, Senior Financial Analyst.

SUMMARY OF RESULTS AND CONCLUSIONS

Monitoring reviews may result in the identification of findings, concerns, or observations. A finding is a deficiency in program performance based on a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized.

A concern is a deficiency in program performance not based on a statutory, regulatory, or other program requirement. HUD issues a concern about program design or operations when in HUD's judgment the practice could, if not corrected, result in noncompliance with a statutory, regulatory, or program requirement.

OVERALL GRANT MANAGEMENT

HUD reviews overall management to ensure that the grantee establishes and maintains sufficient control over its grant activities. The goals of grant management are listed below:

- To achieve disaster recovery and community development program goals;
- To efficiently and effectively manage the people and organizations carrying out grant activities; and
- To clearly document to HUD and to citizens how all funds will be, are, and were used.

Generally, the requirements for an Entitlement grantee are in the CDBG regulations at 24 CFR 570.300, 570.201, 570.506 and 570.208 and largely pertain to entitlement program choices and documentation of compliance. However, Jefferson Parish operates its CDBG-DR program under waivers and alternative requirements published in *Federal Register* Notices. The waivers and alternative requirements published in Federal Register Notices also introduced a requirement for internal audit and continuous quality assurance. HUD included a review of these elements in the overall management review.

Overall Grant Progress

HUD staff reviewed overall progress of CDBG-DR program expenditures and assessed the Parish's capacity to implement the activities listed in their approved action plan. As of this monitoring visit, the Parish has five grant agreements totaling its total grant award and is fully budgeted at \$16,453,000. The Parish has disbursed \$4,023,125.57 or approximately 24% of its total allocation. The Parish has met its expenditure deadlines and was granted an extension for Round 4 of grant funds. HUD is concerned with the Parish's ability to meet its two-year expenditure deadline of August 2019 for its Round 5 grant agreement and recommends the Parish to request for an extension of these funds.

The following table is a budget summary of the Parish's CDBG-DR programs for its Round 4 Extended and Round 5 activities. (Per DRGR at time of monitoring visit).

Table 1: Jefferson Parish's CDBG-DR Programs

Program/Activity	Budget Amount
R4 – Infrastructure (Extended)	\$2,561,802
R5 – Administration	\$ 150,000
R5 – Infrastructure	\$4,106,579
R5 – Housing	\$5,611,493

Staff Capacity

The Department of Community Development is the designated government entity responsible for implementing the B-13-US-22-0001 grant for Isaac recovery. While this is the first CDBG-DR grant that Jefferson Parish has administered as a direct recipient of HUD disaster recovery funds, the Parish has acted as a sub-grantee of the State of Louisiana for Hurricane Katrina recovery CDBG-DR appropriations. Additionally, the Community Development Department has experience working with the CDBG annual appropriation. The Community Development Department has had significant staff turnover and position vacancies since 2015. However, since HUD's 2017 monitoring visit, the Community Development Department has filled all pertinent positions to carry out CDBG-DR activities. The newly filled positions are Community Development Project Coordinator, Administrative Management Support, Housing Counselor and three Community Services Program Coordinators. The Department has also filled the senior accountant position that was vacated last year.

Compliance of P.L. 113-2 Requirements

Website Maintenance

HUD commends Jefferson Parish on their efforts to ensure compliance with the specific requirements of the P.L. 113-2 appropriation. The Parish's CDBG-DR Policies and Procedures Manual addresses matters required by the March 5, 2013 *Federal Register* Notice such as procurement procedures, prevention of duplication of benefits, procedures to detect fraud, waste, and abuse of funds, management of program income and monitoring. Additionally, as recommended in HUD's 2015 monitoring report, the Parish updated its policies and procedures to include the process for posting information on its disaster recovery website. However, during HUD's 2017 monitoring visit, the website did not include all executed CDBG-DR contracts and therefore, the below finding was issued.

Finding M17001: The Parish is Not Maintaining its Public Website in Accordance with the Requirements of the March 5, 2013 *Federal Register* Notice (78 FR 14329).

HUD Corrective Action: Jefferson Parish should update its disaster recovery public website to include all executed CDBG-DR contracts.

As of this monitoring visit, the Parish has updated its website to include all executed CDBG-DR contracts and is in compliance with maintaining its public website in accordance with the requirements of the March 5, 2013 *Federal Register* Notice (78 FR 14329). This finding is closed.

Internal Audit Requirements

The specific requirements relative to the internal audit requirements are contained on page 14329 in paragraph (6) and page 14334 in paragraph (10) of the March 5, 2013 *Federal Register* Notice. Furthermore, this requirement is covered in Section VI. Procedures to Detect Fraud, Waste, and Abuse of Funds in the Certifications of proficient controls, processes and procedures that the Parish executed prior to submission of its P.L. 113-2 Action Plan. A grantee's internal audit

function must report independently of the grantee's organization designated to administer the CDBG-DR award. The internal audit function must be included in the grantee's written monitoring standards and procedures in sufficient detail to ensure program requirements, reaffirm its role in detecting fraud, waste, and abuse, and determine the frequency of monitoring. The monitoring should be implemented in accordance with the grantee's written policies and procedures. HUD found that the grantee did not meet the federal requirements, and therefore issues the following finding.

Finding M18001: The Parish Did Not Finalize and Implement a Policy for Its Internal Audit Function.

Condition: The Parish did not comply with the internal audit requirement outlined in 78 Federal Register 14334. According to 78 Federal Register 14334, an internal auditor is required to conduct a review of the grantee's administration of its program, and the process for performing the internal audits must be described in the grantee's policies and procedures. The Parish's policies and procedures did not describe the process used to perform internal audits of the CDBG-DR grants. As a result, the Parish did not perform an internal audit of the CDBG-DR funds.

Cause: Although the Parish certified that it had procedures in place to perform internal audits of its Department of Community Development, the Parish did not finalize and implement its policies and procedures.

Criteria: According to the March 5, 2013 (78 FR 14334) Federal Register Notice: "Grantees must also describe their required internal audit function with an organizational diagram showing that responsible audit staff report independently to the chief officer or board of the organization designated to administer the CDBG-DR award (typically, the organization is designated by a chief elected official)."

Effect: The Parish's disaster programs and Federal funds are at risk when internal audits of its program's policies and procedures are not performed to ensure program compliance.

Corrective Action: The Parish must immediately finalize and implement its internal audit policies and procedures; and immediately conduct an internal audit of its CDBG-DR (Isaac) funds.

Procurement

The Parish, prior to receiving its executed grant agreement, was required to certify it had proficient financial controls and procurement processes in place. The Parish provided its procurement standards and indicated that its procurement procedures to be followed using CDBG-DR funds complied with 24 CFR 85.36(d)(4). Since the execution of its grant agreement with HUD, the Parish has procured several services for disaster recovery following Hurricane Isaac in 2012.

During HUD's 2017 monitoring visit, two procurement findings were issued. The Parish's responses and corrective actions were reviewed during this monitoring visit and updated statuses are listed below.

Finding M17002: The Parish Did Not Fully Comply with Federal Procurement Requirements

HUD Corrective Action: The Parish is directed to provide no additional CDBG-DR funds toward this contract due to issues identified above in procurement. Additionally, the Parish is to repay, back to its disaster grant, from non-Federal sources, funds already remitted for this contract due to improper procurement mentioned above.

In response to this finding, the Parish terminated the Solutient contract (for the Homeowner Assistance Program) and submitted documentation demonstrating its compliance of procurement procedures. This finding is closed.

Finding M17003: The Parish Did Not Incorporate Performance Requirements and Penalties into Its Procured Contracts and Agreements.

HUD Corrective Action: The Parish must revise its procurement policies and procedures to comply with Hurricane Isaac (P.L. 113-2) requirements. Policies and procedures must include performance standards and penalties, as required in the March 5, 2013 Federal Register Notice. Additionally, the Parish is directed to amend existing contracts to include penalty language, if practical.

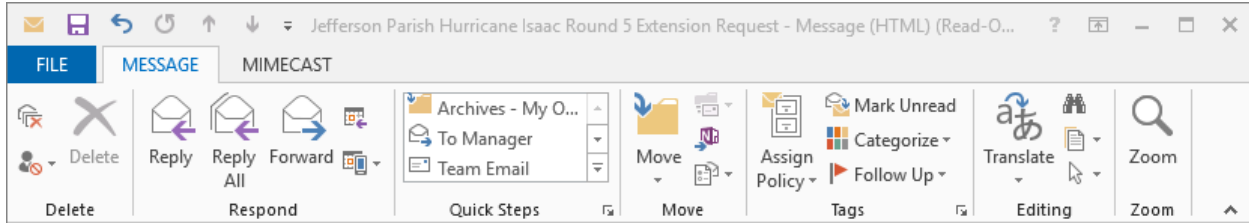
In response to this finding, the Parish has submitted documentation demonstrating that performance standards and contract penalty language is included in contracts. This finding is closed.

Conclusion


During this monitoring visit, HUD staff reviewed the Parish's latest procurement checklist and contract for the Infrastructure project and found no findings or concerns. In addition, the Parish has revised its procurement policies to include language regarding conducting accurate Independent Cost Estimates and cost reasonableness procedures.

ATTACHMENT D

ROUND 5 EXTENSION REQUEST – JUNE 21, 2019



Jefferson Parish Hurricane Isaac Round 5 Extension Request - Message (HTML) (Read-O...



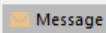
Fri 6/21/2019 4:34 PM


Christi Langoni


Jefferson Parish Hurricane Isaac Round 5 Extension Request

To disaster_recovery@hud.gov; Phyllis.J.foulds@hud.gov

Cc Tamithia Shaw; Nicole Fontenot; Renee Tran; Marlet C. Becnel (Marlet.C.Becnel@hud.gov); Cheryl S. Breaux (Cheryl.S.Breaux@hud.gov)

 Message

 Round 5 April 1 2019.pdf (437 KB)


 June 21 2019 R5 CDBG-DR-Expenditure-Deadline-Extension-Request-Template.xlsx (26 KB)





Good Afternoon,

Please accept this correspondence as a formal request for an extension of Round 5 to expend the remaining obligation for the Hurricane Isaac grant for Jefferson parish.

Should you have any questions or need anything further, please do not hesitate to contact.

Christi Langoni
Administrative Management Specialist IV - DR
Department of Community Development
Joseph S. Yenni Building
1221 Elmwood Park Blvd., Ste. 605
Jefferson, LA 70123
Office: 504-736-6271
Fax: 504-736-6425
Email: CLangoni@jeffparish.net

 See more about Christi Langoni.



LETTER REQUESTING EXTENSION – DATED 04/01/2019



JEFFERSON PARISH
Office of the President

Michael S. Yenni
President

April 1, 2019

VIA EMAIL ONLY: Cheryl.S.Breaux@hud.gov

Mrs. Cheryl Breaux, Director
Community Planning & Development Division
U.S. Department of Housing & Urban Development
New Orleans Field Office
500 Poydras Street, 9th Floor
New Orleans, LA 70130-3099

RE: Extension Request for B-13-US-22-0001, Round 5

Dear Mrs. Breaux:

Please accept this correspondence as a formal request for an extension of Round 5 to expend the remaining obligations for the Hurricane Isaac grant for Jefferson Parish. As you aware, on May 29, 2013, HUD issued FR-5696-N-03, notifying Jefferson Parish, Louisiana of an allocation of \$16,453,000.00 from the Disaster Relief Appropriations Act of 2013. Jefferson Parish will use this funding to address the outstanding needs that resulted from Hurricane Isaac, which struck Louisiana in August of 2012.

The Yenni Administration was elected into office on January 6, 2016 and has made every effort to adhere to all rules regarding P.L. 113-2, which controls the Hurricane Isaac funding. Before the Yenni Administration, the parish had only expended \$562,943.30. Since the Yenni Administration took over in January 2016, we have expended over \$6,793,854.91 to date.

As such, we are striving to serve the unmet needs of the citizens of the parish that suffered the damages from Hurricane Isaac to minimize damages from future disasters. Therefore, we respectfully request that the approval of this extension of Round 5 until September 30, 2022 as we strive to complete this project for our citizens.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Yenni".

MICHAEL S. YENNI
President

Joseph S. Yenni Building – 1221 Elmwood Park Blvd – Suite 1002 – Jefferson, LA 70123 – PO Box 10242 – Jefferson, LA 70181-0242
Office 504.736.6400 – Fax 504.736.6638
General Government Building – 200 Derbigny St – Suite 6100 – Gretna, LA 70053 – PO Box 9 – Gretna, LA 70054
Office 504.364.2700 – Fax 504.364.2828
Email: MYenni@jeffparish.net Website: www.jeffparish.net

EXPENDITURE DEADLINE EXTENSION REQUEST TEMPLATE – DATED 06/21/2019

CDBG-DR Expenditure Deadline Extension Request Template (P.L. 113-2 Grantees Only) [OMB CONTROL NUMBER: 2506-0206]						
In order to request an extension of the 24-month expenditure deadline on CDBG-DR funds from HUD, grantees must complete the following template for each grantee program or project for which an extension is requested.*						
OMB authorized HUD to provide CDBG-DR grantees with expenditure deadline extensions for specific activity types. Only activities within the following activity category types are eligible to request an extension of the 24-month expenditure deadline: housing; economic revitalization; public facilities and improvements; and administration.						
*Note: A local program or project may be reflected in DRGR as more than one activity. An example would be a single family rehabilitation program that will be serve both Urgent Need and Low/Moderate income households. In these instances, both DRGR activities should be submitted using a single template.						
1. GRANT INFORMATION						
a. Grant Number	9-13-US-22-0001					
b. Grantee Name	Jefferson Parish, Louisiana					
c. Requesting Agency	Jefferson Parish, Louisiana					
d. CDBG-DR Obligation Date	8/14/2019					
e. Expenditure Deadline Date (24 months following Obligation Date)	8/14/2021					
2. IDENTIFY EXTENSION REQUEST						
a. DRGR Project #	RS-001-ADMIN; RS-002-INFRASTRUCTURE/DRAINAGE; RS-003-HOUSING					
b. Information on grantee program or project for which a waiver is requested						
<i>Note: Please copy this information directly from DRGR for each DRGR activity related to the grantee program or project for which a waiver is requested.</i>						
Grantee Project or Program	DRGR Grantee Activity Number	DRGR Activity Title	Responsible Organization	DRGR National Objective	DRGR Activity Description	DRGR Budgeted Amount
Activity (Example)	APF_HSG_Dev_14_R01	Affordable Housing Development	Smallville Housing Development Corporation	LMI	Rehab and reconstruction of disaster impacted housing units, which will carry an affordability requirement for 5 years of occupancy for the city of Smallville.	\$10,500,000
Activity #1	RS-001-ADMIN	Admin	Jefferson Parish		Pay all administrative cost associated with Isaac Gt	\$150,000
Activity #2	RS-003-HOUSING-LMI	RS-Housing LMI	Jefferson Parish	LMI	Rehab and reconstruction of disaster impacted residential homes, which will assist LMI residents within Jefferson Parish.	\$2,575,532
Activity #3	RS-003-HOUSING-UN	RS-Housing UN	Jefferson Parish	UN	Rehab and reconstruction of disaster impacted residential homes.	\$2,697,061
Activity #4	RS-002-DRAINAGE-LMI-TDIL	RS-Drainage Jean Lafitte LMI	Jefferson Parish	LMI	Repair public drainage infrastructure within the AE Flood Zone. This activity will make improvements to drainage areas within the Town	\$2,264,416
Activity #5	RS-002-DRAINAGE-LMI-Westbank	RS-Drainage Westbank LMI	Jefferson Parish	LMI	Repair public drainage infrastructure that will assist LMI residents as a result of Hurricane Isaac. This activity will make improvements to	\$1,451,072
TOTAL AMOUNT						\$9,138,081

3. ELIGIBILITY	
Description of program or project for which an extension is being requested and the eligible activity category	On May 29, 2013, HUD issued FR-5696-N-03, notifying Jefferson Parish, Louisiana of an allocation of \$16,453,000.00 from the Disaster Relief Appropriations Act of 2013. Jefferson Parish will use this funding to address the outstanding needs that resulted from Hurricane Isaac, which struck Louisiana in August of 2012. A new infrastructure project to improve drainage was recently added to the Parish's Action Plan to assist areas within the Parish that were impacted by Hurricane Isaac including the Westbank, Crown Point, Barataria, and Town of Jean Lafitte. Also, Jefferson Parish is extending RS Housing to continue to assist with home repairs for those residents affected by the storm.
4. JUSTIFICATION	
a. Explain the reason an extension is needed <i>Provide an explanation for why an extension is being requested, including all relevant and compelling statutory, regulatory, policy, or operational challenges, and how receiving an extension will promote a more effective, efficient recovery effort.</i>	The Jefferson Parish Department of Community Development received a Monitoring Report on May 13, 2016, in response to the onsite monitoring conducted by HUD on August 10-12, 2015 and October 17, 2017 for an onsite monitoring visit conducted on June 19-23, 2017. Both reports noted the ongoing satisfactory progress with the EPO projects. The current phase of EPO project was nearing completion and with the number of reduced applicants in the housing pool, it was necessary to add a secondary phase to this infrastructure project to expend the entirety of the funds which would require an extended deadline. Both infrastructure projects are upon completion phase as well and there will be a need for final inspections, reconciliation of budgets and other close out activities. Also, our Housing program recently has moved homes into elevation and repairs however the Parish requests an extension to assist the remaining population with home repairs.
b. Reduction in the likelihood of of waste, fraud, and abuse <i>If applicable, describe how the provision of an extension would reduce the likelihood of waste, fraud, and abuse.</i>	Since the department was required to take on the task of primary administrative duties for the direct allocation there is a less likely chance of fraud, waste and abuse.
c. Community Stakeholders <i>Identify all community stakeholders (including state or local entities, subrecipients, nonprofits, and civic organizations), their role in program or project implementation, and the impact, if any, an extension would have on these stakeholders.</i>	These project are parishwide and this extension would positively impact all 432,000 residents of Jefferson Parish.

5. IMPACT	
a. Revised expenditure deadline for program/project completion Provide the revised DRGR activity end date for each activity subject to an extension.	9/30/2022
b. Proposed timeline for revised expenditure deadline (See "Projected Qtrly Expenditures" sheet) Provide quarterly expenditure projections for the program/project for which the extension is requested	See attached.
c. Risk associated with not receiving an extension Describe the risks associated with NOT receiving the requested extension, such as the estimated percentage of funds which would be at risk of recapture or specific recovery needs that would not be met if the particular program or project cannot be completed or undertaken.	If the department is not allowed an extension to take on the task of primary administrative duties for the direct allocation of the Hurricane Isaac grant, the entire parish could be more susceptible to future disasters as the appropriate remediation activities have not taken place to avert these losses. Without making the drainage improvements the Parish could not quickly restore service to residents and recover from future disasters. All drainage improvements will utilize drainage materials which will increase the drainage capacity as well as mitigate for future disasters. Also, without completing the elevation improvements and repairs to our current population, residents will be more susceptible to flooding and sustain damages as a result of future disasters.
6. INTERNAL CONTROLS	
a. Monitoring process and internal controls to compensate for the extended deadline Describe the monitoring process and internal controls that the grantee and any subrecipients will implement to ensure compliance with the revised expenditure deadline.	The Jefferson Parish Department of Community Development will be the primary administrative entity for the Community Development Block Grant – Disaster Recovery funds, and will be in charge of ensuring that program requirements and eligibility standards are met. JPCD will partner with other departments within the parish to ensure the efficient implementation of the disaster recovery programs. The Department of Sewerage will be responsible for the daily administration of the infrastructure portion of the allocation, it will report to the Community Development Department for overall oversight of the funding. Additionally, ESP will be administered in coordination with the Floodplain Management and Hazard Mitigation Department. Furthermore, Jefferson Parish Community Development recently engaged a contract with a firm to conduct construction management activities for the housing programs.

5b. Proposed timeline for revised expenditure deadline														
Grantees should start with the quarter that reflects the current DRGR start date of activity. Accordingly, after the template column headers to reflect activity specific information in DRGR (showing the proposed timeline). For example, if the HUD obligation date/activity start date took place in Quarter A of 2015, the first column would be labeled as Q4 2015.														
CDRG-DR Program or Project	Budget Amount	Q1 2019	Q4 2019	Q1 2020	Q2 2020	Q3 2020	Q4 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022	Q2 2022	Q3 2022
Activity #1	\$11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46	\$ 11,538.46
Activity #2	\$198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44	\$ 198,116.44
Activity #3	\$2,074,662.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21	\$ 207,466.21
Activity #4	\$174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85	\$ 174,185.85
Activity #5	\$111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93	\$ 111,620.93
TOTAL	\$6,118,880.54	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89	\$ 702,927.89

CDRG-DR Program or Project	Quarterly Amounts
Activity #1	\$11,538.46
Activity #2	\$198,116.44
Activity #3	\$207,466.21
Activity #4	\$174,185.85
Activity #5	\$111,620.93
TOTAL	\$702,927.89

EACH QUARTER INDICATES THAT \$702,927.89 WILL BE SPENT.

ATTACHMENT E

EXCERPTS FROM CDBG-DR POLICIES AND PROCEDURE MANUAL

Version	Date	Summary of Changes
1.0	July 2016	Completed CDBG-DR Manual
2.0	December 2016	Updated to reflect updated requirements
3.0	June 2017	Additional updates to ensure compliance with regulations and certifications, and to correct clerical and formatting changes.

5.10 Audits

Annually, Jefferson Parish receives over \$750,000 in federal funding. The Jefferson Parish Finance Office is responsible for ensuring that all audits including the single audit are completed in a timely manner and meet all federal requirements. JPDCD works closely with the Finance Office to ensure that all federal funding is accurately accounted for in the audit process.

11.4 Internal Audit

JPDCD's fraud-waste-abuse prevention program is supported by the Parish's Internal Audit Department which provides internal audit coverage for JPDCD and, as such, serves as JPDCD's internal auditor with independent oversight over JPDCD's program operations. JPDCD coordinates with the Department of Internal Audit which has a role in detecting fraud, waste and abuse generally for all JPDCD auditing efforts and specifically as part of the Parish's administration of its CDBG-DR funding allocations. The Department of Internal Audit is responsible for maintaining a reporting line, independent of JPDCD's management team, to the JPDCD Finance Department as it relates to JPDCD activities, including any contested findings and recommendations. In addition, The Department of Internal Audit is responsible for assisting JPDCD with the coordination and review of all external audits, including the annual JPDCD Financial Statement Audit, the Louisiana State Single Audit/OMB A-133 audit of JPDCD and the OMB A-133 audit of JPDCD's subrecipients, as well as any audits conducted by the Louisiana Legislative Auditor.

Allegations of fraud may be reported to the DR program or to the HUD Office of the Inspector General. Allegations of fraud involving any DR funds will be investigated immediately after being brought to the attention of the Parish, through whatever source. An investigation will be conducted if the allegations are made in connection with the services provided by a recipient using CDBG-DR funds.

JPDCD will take all allegations of fraud seriously and will notify the recipient of the allegation; or advise the recipient that it must conduct a preliminary investigation and submit a written report within seven working days from the date of notification. The report must include:

- Nature of the allegation, dollar amount involved, whether a fidelity bond exists and its dollar coverage;
- Who is involved [i.e., individual(s) accused of fraud], recipient's name, (if applicable, names of the recipient's council/commission, and the recipient's chief elected officer);
- When the allegations were made;
- Time period involved;
- Where the incident occurred; and
- How the alleged incident occurred.

ATTACHMENT F

JP ORDINANCE REGARDING DEPARTMENT OF INTERNAL AUDIT

On motion of Ms. Lee-Sheng, seconded by Mr. Roberts, the following ordinance was offered:

SUMMARY NO. 24934 ORDINANCE NO. 25549

An ordinance amending Chapter 2, Article V, Division 3.7 of the Jefferson Parish Code of Ordinances, relative to the appointment and duties of the Director of Internal Audit and otherwise providing with respect thereto. (Parishwide)

WHEREAS, Public officials, government managers, and private citizens want and need to know not only whether government funds are handled properly and in compliance with laws and regulations, but also whether public programs are achieving the purposes for which they were authorized and funded, and, whether they are doing so efficiently, effectively and equitably;

WHEREAS, an independent auditing function can provide objective information on the operations of government programs, assistant managers in carrying out their responsibilities, and help ensure full accountability to the public;

WHEREAS, recognized government auditing standards provide a framework for improved government decision-making, oversight and accountability;

WHEREAS, the independence and public accountability of the Director of Internal Audit can be assured by provision of an appointed Director.

THE JEFFERSON PARISH COUNCIL HEREBY ORDAINS:

SECTION 1. That Chapter 2, Article V, Division 3.7 of the Code of Ordinances be and the same is hereby amended to read as follows:

Sec. 2-162 - Department and position of director created.

(a) The Department of Internal Audit and the position of Director of Internal Audit are hereby created, which Department and position shall have direct administrative supervision over internal audit functions of the Parish and shall set and maintain a tone for ethical behavior, establish a positive ethical environment for the Department, and conduct audit work in accordance with the principles of integrity, objectivity, confidentiality and competency.

(b) The mission of the Department is to promote honest, efficient, effective, economical, and fully accountable and transparent Parish government. To fulfill this mission, the Department shall conduct performance audits and perform non-audit services of any Parish department, program, service, or activity as approved by the Parish Council. The purpose of these audits is to provide the Council, Administration, the residents of Jefferson Parish, and other stakeholders with independent and objective analysis as to whether management is using its financial, physical, and informational resources effectively, efficiently, economically, ethically, and equitably, and in compliance with laws, regulations, contract and grant requirements, and Parish policies and procedures. Audits shall be conducted and non-audit services provided in

accordance with Government Auditing Standards, as established by the Comptroller General of the United States, Governmental Accountability Office.

Sec. 2-162.1 - Qualifications and appointment of director.

(a) *Qualifications.* The Director of Internal Audit shall be qualified by education, training and prior administrative and/or management experience and shall hold an active license of a Certified Public Accountant or a Certified Internal Auditor.

(b) *Appointment.* When a vacancy occurs, the Director of Internal Audit shall be nominated by a committee composed of the Parish President, the at-large Councilmember not presently serving as Council Chair and one District Councilmember each appointed by Council Resolution, and the nominee shall be appointed by Council resolution. The Council may remove the Director by affirmative vote of one (1) more than that which would constitute a majority vote of the Council. The Director shall report to the Parish President for day to day operational purposes limited to: (i) human resource administration; (ii) expense approvals; (iii) leave approvals; and (iv) acquisition of office supplies.

(c) *Salary.* The salary of the director of internal audit shall be established by the parish president within pay grade 22 of the executive pay plan.

Sec. 2-162.2- Independence and Objectivity; Professional Standards.

(a) The Department function must be independent to retain objectivity, and the Department's independence allows the Director to make assessments impartially and without bias while avoiding conflicts of interest. In furtherance of the operation of an independent and objective Department, the Department shall use the following standards in the completion of all audits and in the conduct of all activity:

(1) The Standards and Code of Ethics produced by the Institute of Internal Auditors and published in the *Professional Practices Framework*;

(2) The Standards and Principles produced by the Government Accountability Office and published in the *Government Auditing Standards*; and

(3) the professional and ethical standards issued by the American Institute of Certified Public Accountants.

(b) The Department shall conduct audits in accordance with an annual audit plan as adopted by Council resolution.

(c) The Department shall conduct special audits as requested by the Parish President, the Director or the Council upon approval of the special audit by Council Resolution.

(d) The Director shall engage in audit activities and complete audits in an independent manner, free of any organizational or personal impairment. The Director shall attest in writing that all audit activity was concluded with independence, free from organizational or personal impairment. Any impairment to independence, organizational or personal, shall be reported in writing to the Council and copied to the Parish President and the Inspector General within seven (7) days of discovering the impairment, organizational or personal.

Sec. 2-162.3 - Duties of the director.

- (a) The Director shall be responsible for planning and directing the internal audit activities of the Parish.
- (b) The Director shall be responsible for developing and implementing a comprehensive program of audit coverage in the analysis, interpretation and evaluation of financial and operating information by presenting, at the beginning of each fiscal year, an annual audit plan for adoption by Council resolution. The plan shall identify the preliminary objectives of each audit to be performed, reflecting the purpose of the engagement and a preliminary description of the areas that may be addressed. The Director will consult with the Parish President prior to submitting it to the Council for approval. The Parish President may identify areas where the Parish will benefit from performance audits or a non-audit service. The annual audit plan may be supplemented to include additional audits during the fiscal year by affirmative vote of one (1) more than that which would constitute a majority vote of the Council. The audit plan shall not be amended or supplemented to remove any audit to be performed.
- (c) The Director shall perform financial and operational audits in accordance with the annual plan and pursuant to special audits including the review and evaluation of controls, systems, procedures, contract monitoring and compliance thereof with established Parish policies, and financial operations and compliance with applicable Parish, state and federal laws.
- (d) The Director shall prepare quarterly reports describing the status and progress towards completing the audits. The quarterly reports will be issued to the Council, the Parish President and the Office of Inspector General.
- (e) The Director shall prepare and issue an annual report on the status of recommendations made in completed audits. The report will reflect the status as reported by the Parish President or his or her designee. The report will be issued to the Council, the Parish President, and the Office of Inspector General in the first quarter of the fiscal year. Further follow-up audits will be conducted as determined and recommended by the Director, the Parish President and the Council as approved by the Council.
- (f) The Director shall be responsible for preparing an annual Department operating budget and approving expenses.
- (g) The Director shall be responsible for researching governmental processes and procedures.
- (h) The Director shall be responsible for collaborating with the Compliance and Ethics Officer and the Office of Inspector General to insure that financial and operational audits, controls, systems, procedures, and contract monitoring are in compliance with established Parish policies.
- (i) The Director shall be responsible for advising the Council and the Parish President with objective assessments on the state of the Parish's risk exposures, control issues and other audit/review information.
- (j) The Director shall be responsible for reporting audit findings to the Council,

the Parish President and the Office of Inspector General and providing recommendations for improving areas where opportunities or deficiencies are identified.

(k) The Director shall refer all information indicating the presence of fraud, waste or abuse in a confidential manner to the Inspector General for evaluation, giving no further notice to any person or agency, internal or external, and shall refrain from publishing audit findings until the Office of Inspector General has completed its investigation, if any.

Sec. 2-162.4 – Access to Parish Department, records and personnel.

(a) The Department shall have access to all parish personnel and internal information, excluding individual user passwords, which is relevant to audit activities;

(b) The Department shall have access to information external to the Parish but which may be obtained by the Parish;

(c) The Director may consult with the Parish Attorney as needed to resolve difficult legal issues or to obtain external records relating to audit activity.

(d) The Director shall review parish contracts and consult with the Parish Attorney, as needed, to ensure that each parish contract contains an audit clause permitting access by the director to inspect, copy and audit contractor's books and records relevant to scope of contract;

(e) The Director shall handle information received with the same prudence exercised by those normally accountable for it and consistent with appropriate policies and regulations and the ethical principles cited in the *Government Auditing Standards* as published by the Government Accountability Office.

Sec. 2-162.5 – Audit reports and Communication of findings.

(a) Upon the completion of audit field work, the Director shall prepare a draft report with the proposed findings and recommendations along with a section for Administration or auditee response and forward the draft audit to the appropriate director or manager of the audited entity, the Council, the Parish President and the Office of Inspector General. The Director shall also provide a copy of the draft report to the Parish Attorney for review and comment, including legal advice relating to disclosure of information contained in the report.

(b) Within ten (1) business days of receiving the draft audit, the appropriate director or manager will prepare a written response to the findings and recommendations outlining the corrective action to be taken, which shall be included, unaltered, in the final audit. The Director may agree to an extension of the ten (10) business day deadline. If a response is not received within the appropriate timeframe, the Director shall issue the final audit without management's response.


(c) The Director shall submit the final audit to the appropriate director or manager of the audited department or entity, the Council, the Parish President and the Office of Inspector General and shall publish the final audit on the Parish website.

(d) The Director shall handle documents and information received with the same prudence exercised by those normally accountable for them and consistent with appropriate policies and regulations and the ethical principles cited in the *Government Auditing Standards* as produced by the Government Accountability Office.

The foregoing ordinance having been submitted to a vote, the vote thereon was as follows:

YEAS: 6 NAYS: None ABSENT: (1) Spears

The ordinance was declared to be adopted on this the 4th day of April, 2018, and shall become effective as follows; if signed forthwith by the Parish President, ten (10) days after adoption, thereafter upon signature by the Parish President, or, if not signed by the Parish President, upon expiration of the time for ordinances to be considered finally adopted without the signature of the Parish President, as provided in Section 2.07 of the Charter. If vetoed by the Parish President and subsequently approved by the Council, this ordinance shall become effective on the day of such approval.

THE FOREGOING IS CERTIFIED
TO BE A TRUE & CORRECT COPY

EULA A. LOPEZ
PARISH CLERK
JEFFERSON PARISH COUNCIL

ATTACHMENT G

WEBSITE INFORMATION TESTING RESULTS

Community Development CDBG - Disaster Relief Website Qualitative Testing of Information Posted				
Section	Title	Description	Comply? Yes/No	Internal Audit Comments
2.2.1.1	Initial Action Plan	The initial Action Plan will be posted to the Disaster Recovery website and made available for the public's review in accordance with federal regulations.	Yes	No exceptions noted.
2.2.1.2	Amendments	Substantial amendments to the initial Action Plan (i.e. those that result in a change in program benefit or eligibility criteria, the allocation or re-allocation of more than \$1 million, or the addition or deletion of an activity) will be posted to the Disaster Recovery website and made available for the public's review in accordance with federal regulations.	Yes	No exceptions noted.
2.2.1.3	Master Action Plan	The Parish will maintain a Master Action Plan that will serve as a single point of reference with regards to its plans for utilizing the CDBG-DR appropriation. The Master Action Plan will incorporate all amendments and will be made available to the public via JPDCD disaster recovery website.	Yes	No exceptions noted.
2.2.1.4	Public Comments	In accordance with federal regulations and in the interest of ensuring that the public is afforded ample opportunities to provide feedback to JPDCD on its plans for the recovery effort, the Parish will make available multiple methods by which public comments can be submitted: <input type="checkbox"/> Email address for a JPDCD <input type="checkbox"/> Fax number for the JPDCD Office <input type="checkbox"/> Mailing address for the JPDCD Office <input type="checkbox"/> In-person at any public hearing. The website will clearly identify the individual serving as the primary point of contact for all public comment related communications.	No	<ul style="list-style-type: none"> - Public Comment contact information included an email addresses, mailing addresses and phone numbers; however, did not include a fax number (specific to the Public Comments portion of the website) as per the policy. - Additionally, the Director contact information needs to be updated to reflect recent changes in personnel. - Internal Audit suggests that "City of Jefferson" be changed to "Parish of Jefferson" as a more accurate descriptions.
2.2.1.5	Link to Public Notices	Links to HUD's webpage containing all of the applicable Public Laws, Federal Register Notices, and other related materials will be included in the Disaster Recovery Website.	Yes	No exceptions noted.
2.2.2.1	Quarterly Performance Reports	Quarterly Performance Reports should be posted on the website subsequent to submission to HUD, by the 30th of the month following the end of a quarter.	No	<ul style="list-style-type: none"> - The 1Q 2019 report is posted under a duplicate header of "2018." - The 2Q 2016 report is missing. - The link to the 2Q 2016 report displays 3Q2016. - The link to the 3Q 2016 report displays 4Q2016. - The last quarterly report approved by HUD was 4Q2016. 2017, 2018, and 2019 reports are pending approval.
2.2.3	Website Maintenance	The Disaster Recovery Manager and the Community Development Director directs and supervises the content of the website. The Disaster Recovery Manager develops the narrative and visual content and is responsible for working with Jefferson Parish IT department to update the website, usually on a quarterly basis.	No	Version 3.0 of the Disaster Recovery Policies and Procedures Manual was posted on the website, instead of the most current Version which was 4.0 as of the timing of this audit.

ATTACHMENT H

1ST QUARTER 2019 PERFORMANCE REPORT

Grantee: Jefferson Parish, LA

Grant: B-13-US-22-0001

January 1, 2019 thru March 31, 2019 Performance Report

Grant Number:
B-13-US-22-0001

Obligation Date:

Award Date:

Grantee Name:
Jefferson Parish, LA

Contract End Date:
03/12/2016

Review by HUD:
Submitted - Await for Review

Grant Award Amount:
\$16,453,000.00

Grant Status:
Active

QPR Contact:
Christi Langoni

LOCCS Authorized Amount:
\$16,453,000.00

Estimated PI/RL Funds:
\$0.00

Total Budget:
\$16,453,000.00

Disasters:

Declaration Number

FEMA-4015-LA
FEMA-4041-LA
FEMA-4080-LA

Narratives

Disaster Damage:

On August 28th, 2012 Hurricane Isaac made landfall in Louisiana near the mouth of the Mississippi River almost exactly seven years after Hurricane Katrina. For nearly three days, Jefferson Parish was impacted by hurricane force winds, torrential rainfall, and flash flooding. The storm surge reached up to 11 feet in some areas of the State. Flooding overcame the drainage and sewage infrastructure, causing waste and water to back up into residences. Across the State, more than 800,000 households were without power, and nearly all of the Greater New Orleans Area was affected. In Jefferson Parish, home to more than 400,000 people, the storm surge reached up to 8 feet. Jefferson Parish sustained the largest number of damaged homes from Hurricane Isaac in the State of Louisiana. 12,912 homes sustained storm damage according to FEMA's door-to-door inspections. The total estimated damage to the Jefferson Parish housing stock is over \$224 million. Of that damage dollar value, 63% occurred to households qualifying as low to moderate income population.

Recovery Needs:

The current unmet housing need in Jefferson Parish that can be directly attributed to Hurricane Isaac is staggering. Jefferson Parish has more unmet housing need than any other Parish in Louisiana at \$164,741,803.21. This is after a consideration of FEMA Individual Assistance, SBA Housing Loans, and paid hazard and flood insurance claims.

The Parish will concentrate its efforts in three areas:

First, the Parish will strive to meet the housing needs of those residents who are historically underserved in disaster events: namely, the low to moderate income community, and especially the elderly and the disabled. The Parish believes that these residents bear the bulk of the burden of the unmet need still outstanding from Hurricane Isaac. The damage assessment shows the bulk of the need to be moderate repairs over a widespread area, and the housing assistance program is designed accordingly. The Homeowner Assistance Program will focus on smaller repairs while the Elevation Support Program will assist homeowners who are interested in raising their homes to mitigate against future disasters.

The Parish will also strive to meet the increased need related to elevation and flood insurance premiums brought about by the 2012 flood insurance reforms. The Parish has determined that these reforms may have a negative impact on the historically underserved populations that its housing program targets, and that making assistance with flood-related issues available to this population is in the overall best interest of the Parish.

Secondly, the Parish has identified a deficiency in its sewage overflow capacity systems. During Isaac, the limited sewage processing capacity was overcome by the storm effects. This type of overflow directly impacts the entire Parish community and compounds the already devastating effects of any major storm event. Furthermore, the Parish has concluded that sewage overflow due to limited capacity especially harms the historically underserved populations targeted by its Program because those residents are the least able to leverage independent resources to repair the negative impact of sewage overflow. The Parish will use part of its direct allocation to address these capacity issues in order to prevent the recurrence of the unsafe and unsanitary living conditions that resulted from sewage overflow in Hurricane Isaac. The Parish will address this infrastructure deficiency through an Emergency Pump Out Installation Initiative (EPO) that will serve all areas of the Parish.

Lastly, the Parish has identified impacts from Hurricane Isaac on the Parish's drainage infrastructure. These impacts were documented throughout the parish concentrating mainly on the hardest hit areas of the parish, the westbank including Crown Point, Barataria, and the Town of Jean Lafitte. During Hurricane Isaac, and immediately afterwards, some drainage pumps became inoperable or inaccessible, exacerbating flooding problems in the Parish. There was also high water that prohibited access to the stations to make repairs and/or fuel the generators. In addition, the heavy rainfall, and damaged drainage lines and



pump station capacity, contributed to the flooding and subsequent de-watering of the area. These drainage lines caused a significant portion of the long-term impacts not only to the stations, but directly to these communities. To address this, the Parish will implement the Hurricane Isaac Drainage Improvement Program.

Recovery Needs:

aim to address critical improvements to the Parish's drainage infrastructure on the West Bank.

Overall	This Report Period	To Date
Total Projected Budget from All Sources	N/A	\$16,453,000.00
Total Budget	\$0.00	\$16,453,000.00
Total Obligated	\$10,674,591.08	\$14,697,716.65
Total Funds Drawdown	\$729,991.12	\$4,753,116.69
Program Funds Drawdown	\$729,991.12	\$4,753,116.69
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$0.00	\$3,332,679.88
Most Impacted and Distressed Expended	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00

Progress Toward Required Numeric Targets

Requirement	Target	Actual
Overall Benefit Percentage (Projected)		61.24%
Overall Benefit Percentage (Actual)		60.66%
Minimum Non-Federal Match	\$0.00	\$0.00
Limit on Public Services	\$2,467,950.00	\$0.00
Limit on Admin/Planning	\$3,290,600.00	\$444,495.97
Limit on Admin	\$822,650.00	\$444,495.97
Most Impacted and Distressed Threshold (Projected)	\$15,630,350.00	\$0.00

Overall Progress Narrative:

Hurricane Isaac Drainage Improvement Program – Westbank Locations

During this quarter, construction started in January 2019 and is in progress. Jefferson Parish expended \$163,691.50 for construction costs. Jefferson Parish drew down \$155,506.92 (less retainage), which corresponds to Voucher No. 424872 regarding this project.

Hurricane Isaac Drainage Improvement Program – Town of Jean Lafitte

The Town of Jean Lafitte in coordination with the Jefferson Parish Department of Community Development (JPDCD) held a pre-construction meeting with the engineer of record and the procured construction contractor. A notice to proceed was issued and construction work has begun onsite. A material testing contractor was procured to ensure that site conditions are satisfactory. A discrepancy between the location of water service according to the plans and actual site conditions was discovered by the contractor and the engineer of record, and a proposed change order is under review with the Town of Jean Lafitte and JPDCD. Jefferson Parish expended \$32,129.30 for engineering and project delivery. Jefferson Parish drew down \$235,583.95, which corresponds to Voucher No. 424856 regarding this project.

Hurricane Isaac Emergency Pump-Out Initiative

Construction is complete and has been accepted by Jefferson Parish Council. An error was found in



Change Order No. 4 that was authorized in Quarter 4-2018. The cost of the change order was higher than it should have been. During this quarter, the cost of the previously approved Change Order No. 4 to the contract with Fleming Construction Company, LLC was reduced and re-authorized by Resolution No. 132987 adopted by Council on February 6, 2019. To reflect the new change order amount, the Jefferson Parish Council also re-authorized the final acceptance to the contractor on February 6, 2019 authorized by Resolution No. 132990.

Hurricane Isaac Homeowner Assistance Program and Elevation Support Program

During this time period, applicant eligibility determinations continued in the Elevation Support Program and Homeowner Assistance Program. A non-substantial amendment was issued in order to expand the HAP and ESP eligibility criteria to not only include all Hurricane Isaac impacted residents of Jefferson Parish who owned their home at the time of the time of Hurricane Isaac, at the time of application to the program and at the time of program award; but to also include the following scenario regarding ownership: "In cases where husband and wife acquired ownership of property as community property prior to the storm and one of the spouses dies prior to, during or after storm and the intestate or testate estate by Judgment of Possession provides surviving spouse a usufruct over the children's interest, the surviving eligible owner occupant of the deceased maintaining full ownership of half interest in property with usufruct over the other half interest, is the only individual required to attend closing and execute closing documents. The children maintaining naked interest of other half interest in property are not required to attend closing or execute closing documents."

An additional four (4) eligible awards were made in the Elevation Support Program during Q-1 2019. Three properties (3) were awarded \$30,000 and one (1) property was awarded \$29,000. An additional five (5) properties have completed elevation. Two (2) Satisfaction Surveys were received from ESP clients regarding their repairs. Monthly meetings continued with JPDCD and JP Department of Hazard Mitigation regarding the applicants that received dual funding for elevation. Jefferson Parish expended \$130,853.80 for the Elevation Support Program, which was distributed amongst seven (7) properties. Jefferson Parish drew down a total \$338,900.25 (\$250,900.25 for LMI clients and \$88,000 for Urgent Need clients) which corresponds to Voucher No. 424833 and 424835 regarding repairs associated with the Elevation Support program.

Also, during this quarter, a majority of the HAP applications transitioned into the pre-construction phase. JPDCD created a pilot group that is currently approved for rehabilitation that are in need now of construction management services. Therefore, Resolution No. 132958 was passed by Council on January 16, 2019, which authorized the Jefferson Parish and the New Orleans Education League (NOEL), to execute a Subrecipient Agreement setting forth the terms, conditions, scope of services and proposed budget in an amount not to exceed \$20,000 for Hurricane Isaac CDBG-DR (Parishwide). The subrecipient agreement was entered on February 5, 2019. NOEL shall provide construction management services related to existing damage to housing units as a result of Hurricane Isaac for primary residences that have been deemed eligible within the HAP Pilot group. During this quarter, NOEL inspected 14 homes and issued 14 work write-ups to JPDCD for review. Weekly meetings continued with JPDCD and NOEL regarding the pilot group.

In addition, the Department of Community Development responded to questions on the solicitation for a qualified proposer to provide construction management services for disaster recovery homeowner repair program on residential properties of Jefferson Parish. Two (2) addendums were issued to the solicitation to clarify the scope of the procurement pertaining to RFP No. 0377, which was adopted by Council on November 7, 2018 and authorized through Resolution No. 132595. During this period, five (5) proposals were received, tabulated, and evaluated by the JP Evaluation Committee. The Evaluation Committee made a recommendation to JP Council and the recommendation will be heard at the April Council meeting.

Hurricane Isaac Administration

During this quarter, Jefferson Parish expended \$76,661.59 in administration costs. These costs were for the following salaries, fringe benefits, and Parish appropriations.

In addition, Resolution No. 133160 was passed by Council on February 27, 2019, which approved Amendment No. 11 to the agreement between GCR, Inc. and Jefferson Parish. This amendment is to increase the contract cap by an amount not to exceed \$130,663.00 because there are continuing needs of the department and ongoing projects that need program management.



Project Summary

Project #, Project Title	This Report Period	To Date	
	Program Funds Drawdown	Project Funds Budgeted	Program Funds Drawdown
R1-13124-500-ADMIN, R1-ADMINISTRATIVE	\$0.00	\$338,595.00	\$338,595.00
R2-13124-500-ADMIN, R2-ADMINISTRATIVE	\$0.00	\$73,884.34	\$73,884.34
R2-13124-501-HOUSING, R2-HOUSING	\$0.00	\$58,617.80	\$58,617.80
R2-13127-001-EPO, R2-EMERGENCY PUMP OUT INFRA	\$0.00	\$476,756.86	\$476,756.86
R3-001-ADMIN, R3-001-ADMIN	\$0.00	\$32,016.63	\$32,016.63
R3-004-EPO, R3-004-EPO	\$0.00	\$1,097,735.55	\$1,097,735.55
R3-13124-501-HOUSING, R3-HOUSING	\$0.00	\$338,623.82	\$338,623.82
R4-13127-001-EPO, R4-EMERGENCY PUMP OUT INFRA	\$0.00	\$1,606,895.57	\$1,606,895.57
R4-Infrastructure (EX), R4-Infrastructure (EX)	\$0.00	\$2,561,802.75	\$0.00
R5-001-ADMIN, R5-001-ADMIN	\$0.00	\$150,000.00	\$0.00
R5-002-INFRA, R5-002-INFRA	\$391,090.87	\$4,106,579.00	\$391,090.87
R5-003-HOUSING, R5-003-HOUSING	\$338,900.25	\$5,611,492.68	\$338,900.25



Activities

Project # / Title: R2-13124-501-HOUSING / R2-HOUSING

Grantee Activity Number: R2-13124-501-HOUSING

Activity Title: R2-HOUSING

Activity Category:

Homeownership Assistance to low- and moderate-income

Project Number:

R2-13124-501-HOUSING

Projected Start Date:

07/01/2015

Benefit Type:

Direct (HouseHold)

National Objective:

Low/Mod

Activity Status:

Under Way

Project Title:

R2-HOUSING

Projected End Date:

07/01/2017

Completed Activity Actual End Date:

Responsible Organization:

Jefferson Parish-Community Development

Overall

Total Projected Budget from All Sources

Jan 1 thru Mar 31, 2019

N/A

To Date

\$58,617.80

Total Budget

\$0.00

\$58,617.80

Total Obligated

\$0.00

\$58,617.80

Total Funds Drawdown

\$0.00

\$58,617.80

Program Funds Drawdown

\$0.00

\$58,617.80

Program Income Drawdown

\$0.00

\$0.00

Program Income Received

\$0.00

\$0.00

Total Funds Expended

\$0.00

\$67,726.77

Most Impacted and Distressed Expended

\$0.00

\$0.00

Match Contributed

\$0.00

\$0.00

Activity Description:

The primary focus of HAP will be to address the repairs needs of low-to-moderate income households whose homes were damaged by Hurricane Isaac.

Location Description:

Jefferson Parish including Town of Jean Lafitte

Activity Progress Narrative:



Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources

Amount

No Other Funding Sources Found

Total Other Funding Sources

Project # / Title: R3-004-EPO / R3-004-EPO

Grantee Activity Number: R3-004-EPO

Activity Title: R3-004-EPO

Activity Category:

Construction/reconstruction of water lift stations

Project Number:

R3-004-EPO

Projected Start Date:

02/05/2016

Benefit Type:

Area ()

National Objective:

Low/Mod

Activity Status:

Under Way

Project Title:

R3-004-EPO

Projected End Date:

02/05/2018

Completed Activity Actual End Date:

Responsible Organization:

Jefferson Parish-Community Development

Overall

Total Projected Budget from All Sources

Total Budget

Total Obligated

Total Funds Drawdown

Program Funds Drawdown

Jan 1 thru Mar 31, 2019

N/A

\$0.00

\$0.00

\$0.00

\$0.00

To Date

\$1,097,735.55

\$1,097,735.55

\$1,097,735.55

\$1,097,735.55

\$1,097,735.55



Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$0.00	\$0.00
Most Impacted and Distressed Expended	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00

Activity Description:

Preliminary design phase of Emergency Pump Out stations for the Infrastructure project of DR Isaac.

Location Description:

Throughout Jefferson Parish area neighborhoods

Activity Progress Narrative:

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources	Amount
No Other Funding Sources Found	
Total Other Funding Sources	

Project # / Title: R3-13124-501-HOUSING / R3-HOUSING

Grantee Activity Number: R3-13124-501-HOUSING
Activity Title: R3-HOUSING

Activity Category: Homeownership Assistance to low- and moderate-income
Activity Status: Under Way
Project Number:
Project Title:



R3-13124-501-HOUSING

Projected Start Date:

02/23/2016

Benefit Type:

Direct (HouseHold)

National Objective:

Low/Mod

R3-HOUSING

Projected End Date:

02/23/2018

Completed Activity Actual End Date:

Responsible Organization:

Jefferson Parish-Community Development

Overall

Total Projected Budget from All Sources

Jan 1 thru Mar 31, 2019

N/A

To Date

\$338,623.82

Total Budget

\$0.00

\$338,623.82

Total Obligated

\$0.00

\$338,623.82

Total Funds Drawdown

\$0.00

\$338,623.82

Program Funds Drawdown

\$0.00

\$338,623.82

Program Income Drawdown

\$0.00

\$0.00

Program Income Received

\$0.00

\$0.00

Total Funds Expended

\$0.00

\$365,341.51

Jefferson Parish-Community Development

\$0.00

\$365,341.51

Most Impacted and Distressed Expended

\$0.00

\$0.00

Match Contributed

\$0.00

\$0.00

Activity Description:

The primary focus of HAP will be to address the repairs needs of low-to-moderate income households whose homes were damaged by Hurricane Isaac.

Location Description:

Jefferson Parish, LA, Jean Lafitte, La

Activity Progress Narrative:

Accomplishments Performance Measures

No Accomplishments Performance Measures



Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources

Amount

No Other Funding Sources Found

Total Other Funding Sources

Project # / Title: R4-Infrastructure (EX) / R4-Infrastructure (EX)

Grantee Activity Number: R4-INFA-LMI-EXTENDED

Activity Title: R4-INFA-LMI-EXTENDED

Activity Category:

Rehabilitation/reconstruction of a public improvement

Project Number:

R4-Infrastructure (EX)

Projected Start Date:

05/22/2018

Benefit Type:

Area ()

National Objective:

Low/Mod

Activity Status:

Under Way

Project Title:

R4-Infrastructure (EX)

Projected End Date:

09/30/2022

Completed Activity Actual End Date:

Responsible Organization:

Jefferson Parish-Community Development

Overall

Total Projected Budget from All Sources

Jan 1 thru Mar 31, 2019

N/A

To Date

\$1,306,519.40

Total Budget

\$0.00

\$1,306,519.40

Total Obligated

\$1,306,519.40

\$1,306,519.40

Total Funds Drawdown

\$0.00

\$0.00

Program Funds Drawdown

\$0.00

\$0.00

Program Income Drawdown

\$0.00

\$0.00

Program Income Received

\$0.00

\$0.00

Total Funds Expended

\$0.00

\$0.00

Most Impacted and Distressed Expended

\$0.00

\$0.00



Match Contributed

\$0.00

\$0.00

Activity Description:

Infrastructure project to include sewerage and drainage within the Westbank of Jefferson parish that targets LMI benefit area.

Location Description:

Jefferson Parish

Activity Progress Narrative:

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources

Amount

No Other Funding Sources Found

Total Other Funding Sources

Project # / Title: R5-001-ADMIN / R5-001-ADMIN

Grantee Activity Number: R5-001-ADMIN

Activity Title: R5-001-ADMIN

Activity Category:

Administration

Project Number:

R5-001-ADMIN

Projected Start Date:

08/14/2017

Benefit Type:

Activity Status:

Under Way

Project Title:

R5-001-ADMIN

Projected End Date:

08/14/2019

Completed Activity Actual End Date:



()

National Objective:

N/A

Responsible Organization:

Jefferson Parish-Community Development

Overall	Jan 1 thru Mar 31, 2019	To Date
Total Projected Budget from All Sources	N/A	\$150,000.00
Total Budget	\$0.00	\$150,000.00
Total Obligated	\$150,000.00	\$150,000.00
Total Funds Drawdown	\$0.00	\$0.00
Program Funds Drawdown	\$0.00	\$0.00
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$0.00	\$0.00
Most Impacted and Distressed Expended	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00

Activity Description:

Pay all administrative cost associated with Isaac Grant.

Location Description:

Jefferson Parish

Activity Progress Narrative:

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found



Other Funding Sources**Amount**

No Other Funding Sources Found

Total Other Funding Sources

Project # / Title: R5-002-INFRA / R5-002-INFRA**Grantee Activity Number: R5-002-DRAINAGE-LM-TOJL****Activity Title: R5-002-DRAINAGE-LM-TOJL****Activity Category:**

Construction/reconstruction of water/sewer lines or systems

Activity Status:

Under Way

Project Number:

R5-002-INFRA

Project Title:

R5-002-INFRA

Projected Start Date:

08/14/2017

Projected End Date:

08/14/2019

Benefit Type:

Area ()

Completed Activity Actual End Date:**National Objective:**

Low/Mod

Responsible Organization:

Town of Jean Lafitte

Overall**Jan 1 thru Mar 31, 2019****To Date****Total Projected Budget from All Sources**

N/A

\$2,000,000.00

Total Budget

\$0.00

\$2,000,000.00

Total Obligated

\$2,000,000.00

\$2,000,000.00

Total Funds Drawdown

\$235,583.95

\$235,583.95

Program Funds Drawdown

\$235,583.95

\$235,583.95

Program Income Drawdown

\$0.00

\$0.00

Program Income Received

\$0.00

\$0.00

Total Funds Expended

\$0.00

\$0.00

Town of Jean Lafitte

\$0.00

\$0.00

Most Impacted and Distressed Expended

\$0.00

\$0.00

Match Contributed

\$0.00

\$0.00

Activity Description:

Proposed drainage and subsurface improvements to strategic areas which suffered inundation of water and wind impacts from Hurricane Isaac. All drainage improvements will utilize drainage materials which will increase the drainage capacity as well as mitigate for future disasters. All repairs shall be completed to account for a 10-year storm event in accordance with Jefferson Parish standards, and the drainage shall be tied into the existing drainage system.

The purpose of this proposed project is to repair public drainage infrastructure. The proposed site locations are in the AE Flood Zone. The program will meet a CDBG Program National Objective activities benefiting LMI of the community as a result of Hurricane Isaac. The work sites are approximately 5 acres in size and the maximum total activity in the floodplain is estimated at less than 3 acres. Repairing existing drainage infrastructure in the



floodplain is anticipated to have no impacts on the floodplain or adjacent wetlands.

Location Description:

For Proposed Public Infrastructure Improvements in Jean Lafitte – Drainage Activities: Fleming Curve, Church Street and Gloria Drive

Activity Progress Narrative:

During Q-1 2019, the Town of Jean Lafitte in coordination with the Jefferson Parish Department of Community Development (JPDCD) held a pre-construction meeting with the engineer of record and the procured construction contractor. A notice to proceed was issued and construction work has begun onsite. A material testing contractor was procured to ensure that site conditions are satisfactory. A discrepancy between the location of water service according to the plans and actual site conditions was discovered by the contractor and the engineer of record, and a proposed change order is under review with the Town of Jean Lafitte and JPDCD. Jefferson Parish expended \$32,129.30 for engineering and project delivery. Jefferson Parish drew down \$235,583.95, which corresponds to Voucher No. 424856 regarding this project.

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources	Amount
No Other Funding Sources Found	
Total Other Funding Sources	



Grantee Activity Number:	R5-002-DRAINAGE-LMI-Westbank
Activity Title:	R5-002-DRAINAGE-LMI-Westbank

Activity Category: Construction/reconstruction of water/sewer lines or systems	Activity Status: Under Way
Project Number: R5-002-INFRA	Project Title: R5-002-INFRA
Projected Start Date: 08/14/2017	Projected End Date: 08/14/2019
Benefit Type: Area ()	Completed Activity Actual End Date:
National Objective: Low/Mod	Responsible Organization: Jefferson Parish Community Development

Overall	Jan 1 thru Mar 31, 2019	To Date
Total Projected Budget from All Sources	N/A	\$1,606,579.00
Total Budget	\$0.00	\$1,606,579.00
Total Obligated	\$1,606,579.00	\$1,606,579.00
Total Funds Drawdown	\$155,506.92	\$155,506.92
Program Funds Drawdown	\$155,506.92	\$155,506.92
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$0.00	\$0.00
Most Impacted and Distressed Expended	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00

Activity Description:

Proposed drainage and subsurface improvements to strategic areas which suffered inundation of water and wind impacts from Hurricane Isaac. All drainage improvements will utilize drainage materials which will increase the drainage capacity as well as mitigate for future disasters. All repairs shall be completed to account for a 10-year storm event in accordance with Jefferson Parish standards, and the drainage shall be tied into the existing drainage system.

The purpose of this proposed project is to repair public drainage infrastructure. The proposed site locations are in the AE Flood Zone. The program will meet a CDBG Program National Objective activities benefiting LMI of the community as a result of Hurricane Isaac. The work sites are approximately 5 acres in size and the maximum total activity in the floodplain is estimated at less than 3 acres. Repairing existing drainage infrastructure in the floodplain is anticipated to have no impacts on the floodplain or adjacent wetlands.

Location Description:

Westbank of Jefferson Parish.

Activity Progress Narrative:



Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources	Amount
No Other Funding Sources Found	
Total Other Funding Sources	

Project # / Title: R5-003-HOUSING / R5-003-HOUSING

Grantee Activity Number: R5-003-HOUSING-LMI

Activity Title: R5-003-HOUSING-LMI

Activity Category:

Rehabilitation/reconstruction of residential structures

Project Number:

R5-003-HOUSING

Projected Start Date:

08/14/2017

Benefit Type:

Direct (HouseHold)

National Objective:

Low/Mod

Activity Status:

Under Way

Project Title:

R5-003-HOUSING

Projected End Date:

08/14/2019

Completed Activity Actual End Date:

Responsible Organization:

Jefferson Parish-Community Development

Overall	Jan 1 thru Mar 31, 2019	To Date
Total Projected Budget from All Sources	N/A	\$2,826,431.94
Total Budget	\$0.00	\$2,826,431.94
Total Obligated	\$2,826,431.94	\$2,826,431.94
Total Funds Drawdown	\$250,900.25	\$250,900.25
Program Funds Drawdown	\$250,900.25	\$250,900.25



Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$0.00	\$0.00
Jefferson Parish-Community Development	\$0.00	\$0.00
Most Impacted and Distressed Expended	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00

Activity Description:

To provide rehabilitation in the form of elevation and home repairs that were attributed to Huircianne Isaac.

Location Description:

Scattered sites throughout Jefferson Parish impacted by Hurricane Isaac that are in need of rehabilitation.

Activity Progress Narrative:

During Q-1 2019, Jefferson Parish expended \$250,900.25 in funding for properties that are considered LMI to assist with elevating the properties.

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources	Amount
No Other Funding Sources Found	
Total Other Funding Sources	



Grantee Activity Number:	R5-003-HOUSING-UN
Activity Title:	R5-003-HOUSING-UN

Activity Category:	Activity Status:
Rehabilitation/reconstruction of residential structures	Under Way
Project Number:	Project Title:
R5-003-HOUSING	R5-003-HOUSING
Projected Start Date:	Projected End Date:
08/14/2017	08/14/2019
Benefit Type:	Completed Activity Actual End Date:
Direct (HouseHold)	
National Objective:	Responsible Organization:
Urgent Need	Jefferson Parish-Community Development

Overall	Jan 1 thru Mar 31, 2019	To Date
Total Projected Budget from All Sources	N/A	\$2,785,060.74
Total Budget	\$0.00	\$2,785,060.74
Total Obligated	\$2,785,060.74	\$2,785,060.74
Total Funds Drawdown	\$88,000.00	\$88,000.00
Program Funds Drawdown	\$88,000.00	\$88,000.00
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$0.00	\$0.00
Jefferson Parish-Community Development	\$0.00	\$0.00
Most Impacted and Distressed Expended	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00

Activity Description:

Location Description:

Activity Progress Narrative:

During Q-1 2019, Jefferson Parish expended \$88,000 in funds to assist with the elevation of 3 properties that are considered urgent need.

Accomplishments Performance Measures

No Accomplishments Performance Measures



Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Other Funding Sources	Amount
No Other Funding Sources Found	
Total Other Funding Sources	



ATTACHMENT I

RECAP OF QUARTERLY PERFORMANCE REPORTS

Round	Description	2014	2015				2016				2017			
		4	1	2	3	4	1	2	3	4	1	2	3	4
R1	Admin	19,161.00	-	-	118,145.14	134,343.21	6,945.65	60,000.00	-	-	-	-	-	-
R2	Admin	-	-	-	-	-	5,781.84	-	-	6,418.72	10,730.45	50,953.33	32,016.63	-
R2	Housing	-	-	-	-	22,152.37	36,465.43	-	-	-	-	-	-	-
R2	EPO	-	-	-	-	209,141.59	51,874.47	-	-	-	-	-	-	-
R3	Admin	-	-	-	-	-	-	-	-	-	-	-	-	-
R3	EPO	-	-	-	-	-	-	(395,142.55)	-	-	-	-	-	-
R3	Housing	-	-	-	-	-	-	-	-	52,249.73	86,610.31	92,688.62	107,075.16	-
R4	EPO	-	-	-	-	-	-	395,401.75	-	100,207.40	279,371.55	1,587,468.57	558,181.85	-
R4	Infrastructure	-	-	-	-	-	-	-	-	-	-	-	-	-
R5	Admin	-	-	-	-	-	-	-	-	-	-	-	-	-
R5	Infrastructure	-	-	-	-	-	-	-	-	-	-	-	-	-
R5	Housing	-	-	-	-	-	-	-	-	-	-	-	-	-
		19,161.00	-	-	118,145.14	365,637.17	101,067.39	60,259.20	-	158,875.85	376,712.31	1,731,110.52	697,273.64	-
B														
Round	Description	2018				2019		TOTALS				Difference	Deadline	
		1	2	3	4	1	2	Drawdown	Budget					
R1	Admin	-	-	-	-	-	-	338,595.00	338,595.00	-	-	complete		
R2	Admin	-	(32,016.63)	-	-	-	-	73,884.34	73,884.34	-	-	complete		
R2	Housing	-	-	-	-	-	-	58,617.80	58,617.80	-	-	complete		
R2	EPO	-	215,740.80	-	-	-	-	476,756.86	476,756.86	-	-	complete		
R3	Admin	-	32,016.63	-	-	-	-	32,016.63	32,016.63	-	-	complete		
R3	EPO	395,142.55	1,097,735.55	-	-	-	-	1,097,735.55	1,097,735.55	-	-	complete		
R3	Housing	-	-	-	-	-	-	338,623.82	338,623.82	-	-	complete		
R4	EPO	-	(1,313,735.55)	-	-	-	-	1,606,895.57	1,606,895.57	-	-	complete		
R4	Infrastructure	-	-	-	-	-	-	-	2,561,802.75	(2,561,802.75)	-	9/30/2022		
R5	Admin	-	-	-	-	-	-	-	150,000.00	(150,000.00)	-	8/14/2019		
R5	Infrastructure	-	-	-	-	391,090.87	644,320.85	1,035,411.72	4,106,579.00	(3,071,167.28)	-	8/14/2019		
R5	Housing	-	-	-	-	338,900.25	159,736.48	498,636.73	5,611,492.68	(5,112,855.95)	-	8/14/2019		
		395,142.55	(259.20)	-	-	729,991.12	804,057.33	5,557,174.02	16,453,000.00	(10,895,825.98)	-			
A														
33.8%														

A HUD monitoring Visit July 18-19, 2019

B Q2 Performance Report missing on website as of 07/10/2019 - amounts are calculated to equal totals on 1Q2019 Report

ATTACHMENT #1

AUDITOR INDEPENDENCE STATEMENT

According to Ordinance No. 25549 (April 4, 2018), Sec.2-162.2(a) and (d), the Director of Internal Audit “shall engage in audit activities and complete audits in an independent manner, free of any organizational or personal impairment. The Director shall attest in writing that all audit activity was concluded with independence, free from organizational or personal impairment.”

Sec. 2-162.2- Independence and Objectivity; Professional Standards.

(a) The Department function must be independent to retain objectivity, and the Department's independence allows the Director to make assessments impartially and without bias while avoiding conflicts of interest. In furtherance of the operation of an independent and objective Department, the Department shall use the following standards in the completion of all audits and in the conduct of all activity:

- (1) The Standards and Code of Ethics produced by the Institute of Internal Auditors and published in the *Professional Practices Framework*;
- (2) The Standards and Principles produced by the Government Accountability Office and published in the *Government Auditing Standards*; and
- (3) the professional and ethical standards issued by the American Institute of Certified Public Accountants.

(d) The Director shall engage in audit activities and complete audits in an independent manner, free of any organizational or personal impairment. The Director shall attest in writing that all audit activity was concluded with independence, free from organizational or personal impairment. Any impairment to independence, organizational or personal, shall be reported in writing to the Council and copied to the Parish President and the Inspector General within seven (7) days of discovering the impairment, organizational or personal.

The following is the required attestation meant to comply with both professional standards and Jefferson Parish Ordinance No. 25549.

ATTESTATION:

Internal Audit Report #2019-006 was conducted with independence and free from organizational or personal impairment.



TARA HAZELBAKER, CPA
DIRECTOR OF INTERNAL AUDIT

ATTACHMENT #2

RESPONSE FROM JP DEPARTMENT OF COMMUNITY DEVELOPMENT

#	IA Suggestion:	Department Response:
1 PG 5	<p>1A) Recommendations made by HUD via the onsite monitoring reports should be implemented in a timely manner. Not requesting an extension to expend Round 5 funding places over \$8million at risk. This funding is critical to serving the needs of Jefferson Parish citizens, as outlined in the Action Plan formulated via this program.</p> <p>1B) To ensure that proper communication is in place between the Director and CAA, Internal Audit recommends a quarterly “Dashboard Report” be provided to the CAA. The report should highlight items such as the amount of grant funds received, the grant activities that occurred, the amount of grant funds remaining to be utilized, and any applicable due date. Such a Dashboard Report could be based on the Quarterly Performance Report.</p>	<p>The department agrees with the Internal Auditor’s suggestion and will provide a quarterly report to the CAA, which highlight items such as the amount of grant funds received, the grant activities that occurred, the amount of grant funds remaining to be utilized, and any applicable due date. This quarterly report will be based on the Quarterly Performance Reports provided to HUD. The Director will submit a report to the CAA following the HUD quarterly report schedule:</p> <ul style="list-style-type: none"> • Q-1: January – March (April 30th) • Q-2: April – June (July 31st) • Q-3: August – September (October 30th) • Q-4: October – December (January 30th) <p>The department submitted Round 5 extension request to HUD and is awaiting a repose from HUD. However, the department remains on track to reach all proposed deadlines.</p>
2 PG 6	<p>The CDBG-DR Policies and Procedures Manual should be updated as noted, and the Department of Community Development should continue working with the Department of Internal Audit to aid in successfully completing audits. Formalized and accurate policies and procedures serve as a blueprint of controls and help to ensure that the department remains in compliance with funder requirements, and grant awards are not jeopardized.</p>	<p>Section 11.4 of the CDBG-DR policies and procedures have been updated as noted. JPDCD will continue to work with the department of internal audit to facilitate audits as necessary. The CDBG-DR Policies Manual Version No. 5 was made visible to the public on August 13, 2019, which included the language recommended within this report. The department will continue working with the Department of Internal Audit to aid in successfully completing audits in order to ensure that the department remains in compliance with funder requirements, and grant awards are not jeopardized.</p>

#	IA Suggestion:	Department Response:
3 PG 7	Responses to monitoring reports and any other HUD communications should be made within the timeframe as requested by HUD, or otherwise in a timely manner if no due date is given. Part of being good stewards of grant funds is timely and accurate communications to the funder. Not doing so could jeopardize the parish's future ability to receive grant funding.	The department responded to the HUD report on August 15, 2019. The response is included in a form as an exhibit ^e to this report. The department will ensure timely communication continues between HUD and the Parish.
4 PG 8	The Department of Community Development should ensure that information posted on the Disaster Relief website is accurate, comprehensive, and in accordance with current policies and procedures.	The department took the suggestion of the Internal Auditor prior to receiving this report and ensured that the information posted on the Disaster Relief website was accurate, comprehensive, and in accordance with policies. The department worked with MIS to resolve this matter and those items were fixed.

^e The formal response along with its exhibits from the Department is on file in the Department of Internal Audit and available upon request.

ATTACHMENT #3

RESPONSE^f FROM PARISH ADMINISTRATION

The administration has reviewed and agrees with the findings identified in the audit report. The Jefferson Parish Department of Community Development has appropriately responded to the findings and has initiated corrective actions to provide more timely progress reports and enhanced monitoring of CDBG-DR grants.

The Administration will continue to work with the Community Development Department to insure that Jefferson Parish remains in full compliance with HUD grantor requirements, particularly those pertaining to timely submission of extension requests to minimize any potential risk of losing critically needed grant funds.

The Administration is in agreement with the audit response provided by the Jefferson Parish Department of Community Development. Both the CAA and the COO will work cooperatively with the Department to monitor grant progress and address any future concerns pertaining to this report as well as future CDBG-DR grants. The CAA will assist in this effort by arranging quarterly sit down status meetings with the Department.

^f Response received via email on August 20, 2019, from Walter Brooks, Jefferson Parish Chief Operating Officer.