

Texas General Land Office

CDBG-MIT Implementation Plan

August 12, 2020



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I. Background

The Further Additional Supplemental Appropriations for Disaster Relief Requirements Act, 2018 (Division B, Subdivision 1 of the Bipartisan Budget Act of 2018, Pub. L. 115-123, approved February 9, 2018), made available \$28 billion in Community Development Block Grant disaster recovery (CDBG-DR) funds, and directed the U.S. Department of Housing and Urban Development (HUD) to allocate not less than \$12 billion for mitigation activities proportional to the amounts that CDBG-DR grantees received for qualifying disasters in 2015, 2016, and 2017.

HUD allocated \$4,297,189,000 in CDBG mitigation (CDBG-MIT) funds to the state of Texas through their notice published in the Federal Register, 84 FR 45838 (August 30, 2019) (the Notice). The Texas General Land Office (GLO) has been designated by Governor Greg Abbott to administer CDBG-MIT funds on behalf of the state of Texas.

In addition to the CDBG-MIT funding, the GLO is currently administering the following CDBG-DR grants:

- Hurricane Ike (Rounds 1, 2, & DREF) Grant No. B-08-DI-48-0001
- Wildfire I Grant No. B-16-DT-48-0001
- 2015 Floods Grant No. B-16-DH-48-0001
- 2016 Floods Grant No. B-12-DL-48-0001
- Hurricane Harvey Grant No. B-17-DL-48-0002 for \$57.8 million
- Hurricane Harvey Grant Nos.; B-17-DM-48-0001; B-17-DP-48-0001 for \$5.6 Billion
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Grant closeout has occurred for the following CDBG-DR grants:

- Hurricane Rita I Grant No. B-06-DG-48-0001 for \$74,523,000 completed closeout in 2017,
- Hurricane Rita II Grant No. B-06-DG-48-0002 or \$428,671,849 completed closeout in 2017, and
- Wildfire II Grant No. B-13-DS-48-0001 for \$5,061,000 completed closeout in 2016.

GLO not only has extensive experience in implementing, administering, and overseeing multiple CDBG-DR grants but has the adaptability to scale financial and program operations to the individual needs of each grant as well as the overall CDBG-DR grant portfolio.

GLO will adjust its existing operational structure, existing financial and programmatic policies and procedures, and updating its monitoring and oversight function to administer the CDBG-MIT grant. The Implementation Plan provides detail on the modifications that will be made to the existing CDBG-DR operational structure.

II. Public Law 115-123 Financial Management & Grant Compliance Certification

GLO, as the designated administrator for the State of Texas, is the appointed grantee for administering CDBG-DR and the CDBG-MIT funds. The GLO has designated the Community Development & Revitalization (CDR) as the Division responsible for administering all CDBG-DR grants. While most program functions occur within CDR, this Division is supported within the GLO by the following Divisions: Contract Management, Financial Management, General Counsel, Human Resources, Information Security, Internal Audit, and Communications.

The Financial Management and Grant Compliance Certification, and Evaluation of Risk and Management Capacity checklists is a collaborative effort that is supported by the divisions within the GLO.

A. State Government Financial Standards

Financial Management activities are primarily carried out by the Financial Management Division; however, several financial activities originate within the program area. Policies and procedures supporting the categories identified in the Financial Management Standards checklist are primarily focused on the financial control environment, and the financial and accounting activities carried out by the Financial Management Division. Policies and procedures are living documents and an increased effort is taken to reevaluate and update existing policies, procedures, and internal controls, including the reassignment of roles and responsibilities to ensure financial and accounting activities comply with Federal Register and CDBG-DR requirements.

1. Financial Management

Financial Management policies and procedures were developed to identify the financial and accounting environment that support the CDBG-DR program as a whole and are not intended to be grant specific. However, there are established controls that ensure financial and accounting activities are driven by the grant initiating the required action.

The GLO currently accounts for six CDBG-DR grants, which are separately identified through the use of Funds and Project Cost Accounting (PCA) codes to distinguish between grants and different activities.

The financial and accounting structure for CDBG-MIT has yet to be established. Upon execution of the grant agreement, the PCA structure will be created to ensure the CDBG-MIT accounting structure provides the level of accounting necessary to account for funds according to the financial management standards of 2 CFR 200.302.

Financial management standards and the internal control environment are audited by GLO's Internal Audit department, as well as numerous external auditors, to include the annual Single Audit, which ensures compliance with 2 CFR part 200, Subpart F, Audit Requirements. Within the Single Audit, grant expenditures are reviewed to ensure the expenditures are program costs and are accounted for by CFDA number and grant.

2. Payment and Financial Reporting

Financial Management has an established function for payment and financial reporting that applies to all CDBG-DR grants. While CDBG-DR grants are different and programs vary in size and volume, the existing structure will be adapted to accommodate and incorporate the requirements for the CDBG-MIT grant.

The payment and financial reporting function are a dual process intended to reasonably ensure the timeliness of payments for program expenditures. The existing process for payments is based on the Prompt pay law identified in the Texas Government Code Chapter 2251. State agencies are required to process payments within 30 days of the invoice receipt date or service/delivery date, whichever comes last. If payments are not processed by the Prompt Pay due date, interest will be paid.

Beginning with the 2015 Flood Grant, the GLO created a Timely Expenditure function that is intended to ensure funds are tracked and expended according to Federal Register notice requirements. Financial reports are periodically generated and intended to evaluate the progress of expenditures in comparison to grant deadlines, ensure grant objectives are performed on a timely basis, and taking the appropriate action that may include amending projections, revising program procedures, or reprogramming funds. This function also serves to support the tracking of individual grant projections and actual expenditures according to Action Plan and DRGR budgets. The CDBG-MIT grant will be incorporated into this existing function, with modifications to incorporate the unique timeframe of this grant.

The Timely Expenditure function is also monitored at the subrecipient level. Every quarter, the Monitoring and Quality Assurance (M&QA) team evaluates subrecipient expenditure performance and issues monitoring letters when expenditures are not progressing on a timely basis.

3. Program Income

While the GLO does not currently anticipate any Program Income generated from the use of CDBG-MIT funding, it has existing procedures in place to identify, collect, and utilize program income prior to before drawing funds from HUD. Subrecipients report monthly on revenue generated from their use of CDBG-DR and CDBG-MIT funding and are required to remit any Program Income to the GLO according to the Action Plan language specified for each grant.

4. Revision of Budget and Program Plans

At a minimum, the GLO submits budget updates to its DRGR Action Plan on a quarterly basis in advance of submitting a Quarterly Performance Report (QPR), consistent with DRGR procedures. The GLO also identifies and tracks potential changes to program budgets, program scopes, or program objectives and submits substantial and non-substantial amendments to its Action Plans as necessary to accommodate such changes.

Coordination of budget changes and adjustment occurs among Contract Management, Financial Management, Policy Development, and the DRGR team.

5. Period of Performance

The GLO has multiple control points that check potential purchases, contracts, and invoices to ensure that they include eligible costs incurred during the grant's period of performance, including authorized pre-award costs. Reviewers include Procurement and Contract personnel during the purchasing process, Legal during contract drafting and execution, Program, Business Management, and Financial reviewers during invoice payment, and M&QA and Internal Audit in certain circumstances after program costs have been reimbursed. This function is included in multiple procedures throughout the agency, several of which have been provided as part of the GLO's checklist submission to HUD.

6. Record Retention and Access

The GLO's policies and procedures specify the types of records that are maintained by both the GLO and its subrecipients in order to comply with 24 CFR 570.490. These documents are maintained in uniform locations based on the type and nature of documents collected and maintained until three years after grant closeout. Subrecipients are also held to the recordkeeping requirement standards. Records are maintained at the subrecipient level until GLO provides a formal letter indicating the grant has been closed and the 3-year requirement is expired.

B. Audit Requirements

The State of Texas Single audit function is initiated through the Texas State Auditor's Office (SAO) and Texas Comptroller of Public Accounts (TCPA), which coordinates statewide single audit for all state agencies that meet the standards of 2 CFR 200.331.

The TCPA prepares the State's Schedule of Expenditures of Federal Awards (SEFA) by collecting data from all state agencies and higher education institutions that incur federal expenditures during the fiscal year. The SAO is responsible for the federal compliance portion of the Statewide Single Audit which includes an audit of the SEFA, a review of compliance for each major program, and a review of significant controls over federal compliance. Review of CDBG-DR programs, including CDBG-MIT is only one component of the overall statewide single audit function. As a result, the GLO abides by the direction provided by both the TCPA and SAO.

The SAO contracts with an external audit firm to provide an opinion on compliance for each major program and internal controls over compliance. The audit is conducted under the annual Federal Compliance Supplement. The SAO provides an opinion on the State's SEFA. While not privy to the SAO policies and procedures, the function includes:

- Preparation of financial statement for submission to the SAO (GLO action);

- Taking corrective measures as prescribed by the single audit firm on behalf of the SAO (GLO action);
- Preparation of the schedule of expenditures of Federal awards (SAO action); and
- Submission of the single audit report to the Federal Audit Clearinghouse (SAO action).

M&QA's Subrecipient Single Audit function is tasked with ensuring subrecipients and vendors (as applicable) receiving CDBG-DR funds comply with 2 CFR 200.331 requirements. The function includes tracking Audit Certification Forms identifying whether the federal expenditure threshold is expected to be met, determining whether single audit reports have been submitted to the Audit Clearing House, and reviewing single audit reports to assess indirect and direct risks to the CDBG-DR grants. The assessment results in the issuance of Management Decisions.

C. Procurement Processes

Federal Register Notice for CDBG-MIT grant requires that procurement processes and standards comply with the principles of full and open competition and include an evaluation of the cost or price of the for goods and services funded with grant funds. State Grantees may:

- Adopt 2 CFR 200.318 through 200.326; or
- Follow the Grantee's procurement policies and procedures and establish requirements for procurement policies and procedures for local governments and subrecipients based on full and open competition according to 24 CFR 570.489(g), provided that the procurement requirements include evaluation of the cost or price of the product or service; or
- Adopt 2 CFR 200.317, meaning that the Grantee follows the Grantee's own procurement policies and procedures and evaluate the cost or price of the product or service, but impose 2 CFR 200.318 through 200.326 on its subgrantees and subrecipients.

GLO-CDR has elected to adopt CFR 200.317 and impose 2 CFR 200.318 through 200.326 on its subgrantees and subrecipients. This policy has been established and certified through a legal opinion provided by GLO's Office of General Counsel stating the GLO-CDR has proficient procurement policies and procedures.

To ensure compliance with Federal Register requirements, GLO-CDR developed a procurement crosswalk to determine that state procurement requirements are equivalent with 2 CFR 200.318 through 200.326.

These requirements are clearly stated in all subrecipient agreements issued by the GLO beginning with the 2015 Floods Grant. Furthermore, all subsequent grant agreements listed in Exhibit #1 have imposed the same federal procurement requirements of 2 CFR 200.318 through 2 CFR 200.326 for all subgrantee and subrecipient agreements. These requirements have been communicated to all existing and potential subrecipients of CDBG-DR funding via email, procurement training events, and program kick-off meetings funds. The procurement requirements are also listed on the GLO's website. As new grants are awarded and become active, including the CDBG-MIT and the CDBG-DR for 2018 and 2019 Disasters, the procurement requirements will be included in all agreements with CDBG-DR subrecipients issued by the GLO in relation to these awards.

D. Procedures for Prevention of Duplication of Benefits

The Stafford Act prohibits entities, including households, from receiving disaster recovery funding for a loss that has previously received financial assistance from any source. The disaster recovery funds are supplemental to primary forms of assistance, including private insurance and Federal Emergency Management Agency (FEMA) funds. Duplication of Benefits (DOB) verification and analysis ensures that program funds compensate applicants and entities for damages and needs that have not been addressed by an alternate source, either through funding or assistance.

The GLO coordinates with a number of state and federal entities, including FEMA, Small Business Administration (SBA), Texas Windstorm Insurance Association to ensure that the most up-to-date information is used to verify DOB. Because of federal laws and regulations such as the Privacy Act of 1974, local entities are typically asked to coordinate directly with federal entities to obtain local beneficiary data. Existing DOB policies and procedures incorporate the DOB Federal Register guidance ([HUD DOB Guidance - FR 5582](#)).

E. Procedures to Determine Timely Expenditures

Beginning with the 2015 Floods Grant, the GLO created a Timely Expenditure function, intended to track expended grant funds according to Federal Register requirements. The Timely Expenditure function has monthly and quarterly procedures designed to evaluate the progress of expenditures in comparison to grant deadlines, ensure grant objectives are performed on a timely basis, and as necessary, taking appropriate action that may include amending projections, revising program procedures, or reprogramming funds to ensure program funds are expended within the terms of the grant.

The applicable Federal Register for CDBG-MIT prescribes a 12-year expenditure timeframe, with 50% of the funding to be expended within 6 years. GLO will utilize the projections in the CDBG-MIT Action Plan for this purpose to ensure that targets are met at both 6- and 12-year timeframes. The function also allows for Action Plan projections to be updated as actual information is gathered.

F. Procedures to Maintain a Comprehensive Website

The GLO-CDR's existing website continues to be modified to comply with Federal Register requirements and become a one-stop-shop for providing financial and program information to families seeking disaster assistance and subrecipients administering CDBG-DR funds.

The GLO-CDR will be making upgrades to our [Recovery.Texas.Gov](#) website that will include enhancing the implementation manual page with subrecipient program forms and training resources. This will provide for easier navigation and a coordinated listing of helpful training resources and form listing by program area. An estimated time frame for completion is planned for mid-autumn, 2020.

G. Procedures to Detect Fraud, Waste and Abuse of Funds

The Monitoring and Quality Assurance (M&QA) team is responsible for carrying out Fraud, Waste, and Abuse (FWA) procedures when instances of FWA cases are identified. The M&QA team created a standard operating procedure outlining roles, responsibilities, and the processes by which allegations of FWA of federal funds are reviewed, and as applicable, provided to HUD OIG. SOPs serve as a guide for staff and stakeholders to identify and address suspected FWA associated with CDBG-DR grants. Further, it outlines GLO's commitment to maintaining a culture of compliance and promoting best practices in reporting FWA.

Verifying the information of applicants, and in particular, determination of CDBG-DR eligible activities is a key monitoring and oversight factor that is performed throughout GLO-CDR functions. Eligibility is not only determined but also reviewed within the housing and infrastructure programs. Program policies, procedures, and guidelines identify the housing and infrastructure criteria that must be provided to reasonably determine whether documents support CDBG-DR eligible activities. The [Recovery.Texas.Gov](https://www.recovery.texas.gov) website identifies the existing policies, procedures, and guidelines for CDBG-DR eligible activities administered through current executed grant agreements, such as rehabilitation, reconciliation, repair/replacement of damaged public facilities, acquisition, economic revitalization, etc.

Conversely, finalized policies, procedures, and guidelines for CDBG-MIT have not been posted, particularly in the absence of CDBG-DR eligible activities being known as a result of the competitive nature of the grant. However, existing SOPs for similar activities have been provided in support of the MIT certification checklist with the condition that they will be updated to reflect MIT activity requirements.

M&QA is responsible for oversight of operations, including monitoring of programs, functions and/or activities primarily at the subrecipient level. For state-run programs, monitoring occurs at a program level to determine that compliance of program expenditures is supported with program documents. As of the date of the Implementation Plan, GLO-CDR is administering six active grant agreements for disasters related to hurricanes, flooding events, and wildfires. Given the variety of CDBG-DR eligible activities among the existing open grants, the M&QA monitoring function deploys a two-tiered approach for performing monitoring and oversight activities. Phase one is based on the M&QA Monitoring Policies and Procedures which are designed to identify the monitoring procedures for performing monitoring and oversight reviews consistently among the different requirements of each grant. Phase two is intended to be grant-specific through the development of risk assessment and monitoring plans that incorporate the unique CDBG-DR eligible activities within each open grant.

Risk assessments and monitoring plans are developed/updated annually, typically occurring between May and August for execution on September 1st, to coincide with GLO's start of the fiscal year. It is within the updated risk assessment and monitoring plans that describe how and why monitoring is conducted, the frequency of monitoring, and the items to be monitored. M&QA evaluates and updates its monitoring function in tandem with the annual risk assessment and monitoring plan to achieve a continuous improvement monitoring environment.

The CDBG-MIT is in its pre-implementation phase; therefore, CDBG-DR eligible activities have yet to be determined. Risk assessment and monitoring plans are not expected to be initiated until there is a defined population of subrecipients with executed agreements. However, given the unique nature of the CDBG-MIT grants, and the increased number of new subrecipients to CDBG-DR, vertical monitoring of the procurement function may be initiated to ensure subrecipients have properly solicited services in compliance with federal requirements.

GLO's Internal Audit department also serves as an independent source of audit and oversight activities on behalf of CDBG-DR programs. In order to manage the additional workload and additional expertise required for the CDBG-DR programs, Internal Audit made several enhancements, including additional audit staff and contracting with an external firm to provide additional expertise as well as staff augmentation. Internal Audit has also revamped its risk assessment process to allow for a more agile audit planning, allowing audits to occur as needed rather than just annually. As is the case with monitoring, the population is considered based on executed subrecipient agreements, programs, and financial activities.

Subrecipients, vendors, contractors are equally responsible for the detection and prevention of fraud, waste, and abuse, misappropriations, and other irregularities within the CDBG-DR grants. Detection and prevention primarily occur through the establishment of policies, procedures, and internal controls. The consistent application and documentation of program requirements provide reasonable assurance that projects and activities comply with program requirements or maybe an indicator of an FWA case.

M&QA, on an annual basis, ensures fraud training is provided to GLO staff, subrecipients and vendors contracted to provide services on behalf of the CDBG-DR grants. Training may be coordinated with HUD, HUD OIG or be may be performed independently by the M&QA team. Training events consist of, at a minimum, a presentation, participant registration, and sign-in sheets to document participation.

FWA cases may come from a variety of sources including telephone, email, on-line form, customer complaints, and internally as program policies and procedures are administered.

The FWA function, as it pertains to CDBG-MIT, is expected to be captured within the existing structure. However, as part of the annual update to Monitoring and FWA activities, M&QA will incorporate fraud training and best practices that may arise from particular CDBG-MIT risks to continue enhancing the FWA function.

III. Evaluation of Risk and Management Capacity

A. Application Status

GLO-CDR has these three competitions that will provide the opportunity for local applicants to identify potential mitigation projects within their communities and apply for funding directly to the GLO. The 2015 (\$46,096,950) and 2016 (\$147,680,760) Floods State Mitigation Competitions are independent of one another and will provide funds to cities, counties, Indian Tribes, and councils of governments (COG) to address risks in the 2015 and 2016 Floods HUD- and state-designated Most Impacted and Distressed (MID) areas. The third competition is for Hurricane Harvey State Mitigation Competition Round 1 (\$1 billion of \$2,144,776,720 total) open to cities, counties, COGs, state agencies, and special purpose districts.

GLO-CDR opened the submission of subrecipient applications on May 28th; applications will be due by 5:00 pm on October 28, 2020.

GLO-CDR published CDBG-MIT Competition Application Guide which describes the approach taken for evaluating applications. However, given the competitive nature of the grant award, communication in the form of a request for information will be very limited considering awards will be based on a community's ability to meet the criteria for eligibility. In general, communities can submit a question via cdr.mitigation@recovery.texas.gov or by contacting GLO-CDR via telephone at 844-893-8937 or 512-475-5000.

Individual program teams (i.e. Housing, Infrastructure, Customer Relations, etc.) have primary responsibility for providing communicating and coordinating with communities, subrecipients, and applicants for specific program activities. Customer Relations is responsible for providing customer relations services to the public on behalf of GLO-CDR. As applicable, Customer Relations will facilitate coordination between the public and program teams to ensure timely responses are provided.

Applicants requesting or submitting applications for CDBG-MIT assistance will have the opportunity to submit applications, along with source documents electronically to GLO-CDR's Texas Integrated Grant Reporting (TIGR) System. As a result, access will be granted so that applicants may look identify their status when wishing to do so. However, applicants will also have the ability to outreach a program team or utilizing the CDR email (cdr.mitigation@recovery.texas.gov) or GLO-CDR's telephone number (844-893-8937; 512-475-5000).

The SOPs provided for our existing grants are intended to identify an existing structure is in place; they are not CDBG-MIT specific. However, existing SOPs and program structures will be modified to facilitate the administration of the CDBG-MIT program and Action Plan requirements. There are several reasons why SOPs have yet to be updated:

1. Limited local funding to charge MIT expenditures;
2. Grant agreement has not been executed; and
3. Full-Time-Equivalents (FTEs) are in the process of being hired.

As a result, administrative efforts are focused on critical action items until the grant agreement is executed and all staff is onboarded. However, the CDBG-MIT program continues to be developed and implemented given our existing resources.

B. Capacity

GLO-CDR performed an internal assessment of its capacity to perform the administrative duties of the program. In September 2019 two key action items were taken: approval for additional GLO staff and vendor support would be needed to assist with the MIT workload.

On September 20, 2019, GLO-CDR was approved to hire for an additional 35 Full-Time-Equivalents to assist with the CDBG-MIT program. This request would be in addition to the 108 staff currently working within GLO-CDR.

On September 27, 2019, GLO-CDR through an internal memo, initiated action to procure vendor services to assist in supporting the GLO with administrative services. As a result, planning efforts for procurement activities were initiated to solicit support for the following services:

- Environmental Services
- Engineering Oversight Services
- Grant Management, Project Management, Financial Support, & Training Services
- GIS Service
- Inspection Services
- Monitoring Services
- Planning Oversight Services
- Program Implementation Services
- Resilient Builder Services

Through our initial efforts, informal action was initiated to assess the capacity and taking direct action to have both GLO staff and vendor services in place before grant execution or shortly thereafter. Solicitations for the above services have been issued and each of the solicitations is in different phases of the procurement process.

As of August 1st, 2020 GLO-CDR is considerably close to finalizing its efforts to address its assessment of capacity and subsequent actions for the plans initiated in September 2020.

C. Staffing

On September 20, 2019, GLO-CDR was approved to hire for an additional 35 FTEs to assist with the CDBG-MIT program. As of August 1, 2020, GLO-CDR has onboarded approximately 75% of the FTEs allocated for the CDBG-MIT program.

D. Internal and Interagency Coordination

GLO-CDR's Policy Integration and Infrastructure Program teams meet regularly with agencies such as TDEM, GLO Coastal, Texas Historical Commission, USACE, etc. to plan and coordinate

on numerous activities that impact CDBG-DR and MIT programs. These coordination efforts ensure consistency in administering disaster recovery and mitigation efforts. Coordination takes the form of discussions addressing State-run and subrecipient activities, including program accomplishments and challenges or planning efforts for MIT program activities.

GLO-CDR and the Texas Department of Emergency Management (TDEM) began coordinating on HMP/HMGP once both agencies understood the success of these activities was predicated on coordination. Informally, as both agencies continue to coordinate the viability of projects and administration of HMP/HMGP programs, there has been a constant sharing of information, documents, and open lines of communication to achieve a seamless delivery of programs.

GLO-CDR is a member of numerous interagency committees that meet monthly, quarterly, semi-annually, and annually to facilitate program assistance to communities affected by disaster events

E. Technical Assistance

GLO-CDR will be providing technical assistance using the same approach used for all other CDBG-DR grants. Technical assistance can take the form of a direct written request to the CDR email (cdr.mitigation@recovery.texas.gov), GLO-CDR's telephone number (844-893-8937; 512-475-5000), or coordinating directly with GLO-CDR staff.

Technical assistance may also be initiated if the GLO-CDR identifies a matter that requires direct assistance as a result of a program risk that is identified within grant management activities. GLO-CDR can provide technical assistance either through GLO-CDR staff or a vendor contingent on the need.

F. Accountability

The GLO has been designated by Governor Greg Abbott to administer CDBG-DR funds, inclusive of CDBG-MIT on behalf of the state of Texas. GLO-CDR is the assigned GLO division dedicated for the direct implementation, administration and oversight of CDBG-DR activities. Within the GLO structure, there is clear and frequent coordination between GLO-CDR's Senior Deputy Director and the GLO's Chief Clerk and Commissioner.

GLO-CDR is committed to continuously assessing and revising existing financial and program structures for all our CDBG-DR grants. In particular, as CDBG-MIT infrastructure continues to be developed, GLO-CDR is taking the action necessary to administer a successful program.