

# Louisiana Office of Community Development, Disaster Recovery Unit Preamble Evaluation of Management and Oversight of Funds

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## Introduction

Since its creation in the immediate aftermath of hurricanes Katrina and Rita in 2005, the state of Louisiana, Office of Community Development, Disaster Recovery Unit has been the administrator and fiscal agent for the CDBG-DR grants. OCD-DRU manages an annual budget of over \$300 million and has prior experience in managing HUD funds through the CDBG allocation for over 10 years.

Through experience with the annual CDBG program, OCD-DRU has existing systems and procedures, as well as formally established monitoring strategies that encompass cross-cutting regulatory requirements including HUD program rules and regulation, civil rights, environmental, labor standards, fair housing, citizen participation and recordkeeping. The CDBG-DR program will leverage these existing resources and adapt them to the requirements of Public Law 114-113 and related guidance.

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

## Financial Controls

OCD-DRU certifies proficiency in financial management through the use of established financial systems and internal controls. The sections below provide further description of existing risk management measures.

Additional information can be found in the Public Law 114-223 Guide for Review of Financial Management for CDBG-DR Grantees (**Appendix A**) and the P.L. 114—223 Certification Checklist (attached), completed by the state, which answers specific questions about financial standards and which personnel or unit are responsible for each item. The completed guide and accompanying procedures will be submitted to HUD in addition to the Action Plan and Implementation Plan.

## Single Audit and Annual Financial Statement

The state of Louisiana is in full compliance with Single Audit requirements. The Louisiana Legislative Auditor (LLA) is required by statute (RS 4.513) to audit the financial statements of individual state agencies, departments, boards, and commissions that are included within the state's Comprehensive Annual Financial Report (CAFR).

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

The State of Louisiana Single Audit Report for the Year Ended June 30, 2015, is available electronically at: [http://app.lla.state.la.us/PublicReports.nsf/B25F369296E9A2D786257F77006435BE/\\$FILE/0000D6B2.pdf](http://app.lla.state.la.us/PublicReports.nsf/B25F369296E9A2D786257F77006435BE/$FILE/0000D6B2.pdf).

The state of Louisiana Comprehensive Annual Financial Report for the Fiscal Year Ended June 30, 2015, is available electronically at: <http://www.doa.la.gov/osrap/library/Publications/FINAL%20CAFR%20-%202012-22-15%20with%20covers.pdf>.

## 1. Findings

The Louisiana Single Audit Report for the Year Ended June 30, 2015, contained two reportable findings for the Louisiana Office of Community Development, Disaster Recovery Unit relating to Catalogue of Federal Domestic Assistance (CFDA) 14.228 Community Development Block Grants/State's Program and Non-Entitlement Grants in Hawaii. Both were considered material weaknesses in internal control.

The findings are as follows:

- 2015-010 - Inadequate Grant Recovery of Homeowner Assistance Program Awards (Schedule C, page 46); and
- 2015-011- Inadequate Recovery of Small Rental Property Program Loans (Schedule C, page 48).

## 2. State Responses

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

- 2015-010 - Inadequate Grant Recovery of Homeowner Assistance Program Awards (Appendix B-11); and
- 2015-011 - Inadequate Recovery of Small Rental Property Program Loans (Appendix B-13).

OCD-DRU monitors its Subrecipients for Single Audit compliance with 2 CFR 200, Subpart F. Subrecipients who expend \$750,000 or more in federal funds during the fiscal year are required to submit their Single Audit reports to the LLA as required by state audit law (RS 25:513) within six months after the end of the entities' fiscal year. The LLA reviews the audits for completeness and performs ongoing monitoring activities to ensure the competency of the CPA firms that performs these audits. Subrecipients who fail to submit their reports timely will be placed on the LLA Non-Compliant List and are prohibited from receiving any additional state funding until they are removed from the list. OCD-DRU will obtain copies of the Single Audit reports and review them for material weaknesses and findings or concerns. OCD-DRU will also request any corrective action plans (CAPs) and issue management

decisions regarding CAPs where findings have been reported involving federal funding provided by OCD-DRU.

## Guide for Review of Financial Management

The completed Public Law 113-2 Guide for Review of Financial Management for CDBG-NDR Grantees is included as **Appendix A** and references the Financial and Administrative Policies and Procedures Manual (**Appendix B**), the Financial Fidelity Insurance Certification (**Appendix C**), and the OCD-DRU Subrecipient Monitoring Procedures Audit Requirements (**Appendix D**).

## Financial Management

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

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

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

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

For our grantees, required financial controls and accounting system requirements are contained in Chapter 5 of the State of Louisiana OCD-DRU Disaster Recovery CDBG Grant Administrative Manual, and the OCD-DRU Financial and Administrative Policies and Procedures Manual (**See Appendix B**). The entire Grant Administrative Manual can be viewed at <http://www.doa.la.gov/Pages/ocd-dru/DRadminManual.aspx>

## Internal Controls

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

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

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

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

## Proficient Procurement Processes

For Procurement, the state follows the Louisiana Revised Statutes 39, Chapter 17 titled Louisiana Procurement Code. (See **Appendix E**). These policies of the state align with the requirements set forth under 2 CFR 200.317 -200.326 ensuring fair and open competition. A cross walk between the federal regulatory requirement and its counterpart under the Louisiana Procurement Code can be found in **Appendix F**.

All other subrecipients are now required to follow 2 CFR Part 200.318 through Part 200.326, which can be found in the Grant Administrative Manual at <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>.

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

## Procedures to Prevent Duplication of Benefits

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

- Verify all sources of DR assistance;
- Determine applicants unmet needs; and
- Ensuring beneficiaries agree to repay.

The State will procure a qualified vendor to provide program management services to all housing program applicants. Once identified, the state, working with the vendor will develop policies and procedures to ensure compliance with the state's Duplication of Benefits Policy as well as ensuring the accuracy of all applicant's information. For more information about the vendor's role, see page 15, titled "Internal and Interagency Coordination".

In May 2015, OCD-DRU sent notification to all subrecipients requesting an electronic copy of their DOB Policy and a reminder of the DOB Policy requirements. As of Jan 28, 2016, OCD-DRU has received, reviewed, and approved all DOB policies.

## Procedures to Determine Timely Expenditures

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

OCD-DRU and the grantee. In addition to technical assistance and penalty requirement, OCD-DRU has a payment system named GIOS which ensures timely processing of request for payment.

If a Grantee fails to meet the required deadlines, the grant is reviewed by the Tiger Team to discuss possible reprogramming of funds. The Tiger Team is an action committee comprised of program managers, outreach staff, section managers and directors from the Recovery Programs section, Compliance and Monitoring staff and Executive Management. Employees from Reporting and Finance may be called into the Tiger Team as well to address particular situations.

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

Upon the submission of a request for payment by a grant recipient, the request is tracked through each stage so that OCD-DRU can monitor any potential process delays. This allows a basis for process improvement, as well as a mechanism to identify problem invoices earlier in the process. Analysis on payments processed in GIOS in the first five months of 2016 shows that it only takes an average of 10 calendar days from the time of initial submission for OCD-DRU to internally approve a request and submit to the state's Office of Finance and Support Services for payment. This includes the time taken on any invoices that need to be returned to the subrecipient for correction or further clarification; the actual review time by OCD-DRU staff is significantly less. From the time the request is sent to OFSS, the recipient is paid within an average of five calendar days.

In order to provide an appropriate level of management review, Reporting and Analysis staff produce a monthly budget report for both the Katrina/Rita funds (one report combining the three separate appropriations), the Gustav/Ike grant, and lastly the Isaac grant. These budget reports are distributed to the OCD-DRU leadership, to the State of Louisiana Joint Legislative Committee on the Budget and to the public via our website at <http://www.doa.la.gov/Pages/ocd-dru/Reports.aspx>. The budget reports track expenditures and provide visibility on unobligated and unexpended amounts on a monthly basis.

In addition, the management team reviews a quarterly report developed to facilitate OCD-DRU's Quarterly Managers' Review meetings. These reports detail progress on a program-by-program basis and include a comparison of actual spending to projected expenditures. Projections are developed based on a combination of current spend rates, projected start and end dates, and input from program managers on anticipated milestones.

Each program is assessed during these reviews to identify whether it is progressing on target or if some programmatic intervention is required. As part of this review, each program is assessed to identify dollars that will need to be reallocated and status updates on those programs ready to begin closeout procedures. At the direction of the executive director, the director of Strategic Initiatives and

Performance Management is responsible for ensuring that monthly budget reports are produced and that the Quarterly Management Reviews are conducted on a quarterly basis.

## Procedures to Maintain a Comprehensive Website

The Office of Community Development, Disaster Recovery Unit has developed and continues to maintain a comprehensive website dedicated to the state of Louisiana's CDBG-DR programs and related activities associated with these funds, which may be found at <http://www.doa.la.gov/Pages/oecd-dru/Index.aspx>. The Public Information Officer and Administrative Analyst will serve as website co-managers responsible for updating the site on at least a monthly basis, or more frequently, if needed. **See Appendix I.** The OCD-DRU website will contain the following top menu tabs and content:

- **Home:** Description of funding sources and uses; news releases; and partnership links\*;
- **Disasters:** Descriptions of each disaster and its associated links;
- **Recovery Programs:** Links to all programs, organized by named disaster;
- **Resilience:** Timeline & Links to the state's National Disaster Resilience award;
- **Reports:** Links to Monthly & Quarterly Performance Reports for each disaster and miscellaneous reports;
- **Actions Plans:** Links to Action Plans for each disaster;
- **Administrative Manual:** Links to each section of the Admin Manual; and
- **Contact Us:** Names and email addresses for OCD-DRU Executive Staff.

\* Includes a link to the Restore Louisiana Task Force webpage, which provides current information about OCD-DRU's flooding recovery programs.

## Procedures to Detect Fraud, Waste and Abuse of Funds

The process of detecting any fraud, waste and abuse of CDBG-DR funds involves not only OCD-DRU, but also the state Division of Administration's Internal Auditor and the following state offices: the Office of Legislative Auditors, and the Office of Inspector General and the Office of Finance and Support Services.

### Office of the Legislative Auditors

The Legislative Auditor serves as the supervisory body of public spending, overseeing more than 3,500 audits of state and local governments and their related quasi-public enterprises. Conducting independent financial and performance audits of the state's agencies, colleges, and universities,

auditors identify issues in an effort to protect public resources and tighten government control systems. When necessary, they look into allegations of fraud, waste or abuse. The Legislative Auditor will perform an annual audit of the Division of Administration (DOA), which includes OCD-DRU, in accordance with 2 CFR 200 Part F.

### Office of State Inspector General

In addition, the state has an established Office of Inspector General. The office's mission is to investigate white collar criminal and public corruption cases, and to root out and prevent fraud and corruption in government. The office is a designated law enforcement agency by statute, with the associated investigative powers and privileges. The Inspector General answers to the governor.

### Office of Finance and Support Services

OFSS, a division within the Division of Administration, has established clear designation of responsibilities in order to ensure separation of duties. This separation of duties, along with other established operational policies and procedures, provides assurance that fraud cannot be accomplished without collusion among employees in separate areas. OFSS is responsible for payments, federal draw requests and state and federal financial reporting. One employee actually inputs the properly authorized payment request into the financial system, and the request must be approved by an OFSS Supervisor in the system before a payment request is approved.

### OCD-DRU

OCD-DRU is responsible for the day-to-day administration of the CDBG-DR program. Appropriate personnel review all requests for payment and accompanying invoices to ensure costs are reasonable and within the scope of the activity funded. In addition to grantee certification of the accuracy of payment requests, two authorizations are required on a request for payment prior to sending the request to OFSS for payment. All payment requests are reviewed for proper authorized signatures, dates of service and supporting documentation prior to input into the financial system for payment.

### Payment Management

The payment management unit of OFSS provides information to the appropriation accounting unit so that federal funds can be drawn. The federal draw down request is reviewed and approved by an OFSS supervisor prior to the draw down request being processed. All funds are electronically transferred to the State Treasurer's central depository account to be used to liquidate the payables. The financial reporting of the expenditure and revenue activities is prepared by the appropriate accounting unit. All

reports are prepared by one employee and reviewed by the appropriate manager prior to release of the report/statement.

The process within OCD-DRU begins at the program level. Program and Project Managers have established application review processes that include confirming project information provided by grantees and subrecipients, with an emphasis on duplication of benefits, valid project descriptions, confirmed sources of funding, eligible activity and CDBG-DR National Objective.

### Grantee Administration Manual

OCD-DRU has developed a Grantee Administrative Manual for the CDBG-DR funds, which is provided to all grantees and subrecipients. It can be found electronically at <http://www.doa.la.gov/Pages/ocd-dru/DRAdminManual.aspx>. The purpose of the manual is to assure that all CDBG-DR funds are properly managed and accounted for, and to assure that grantees and subrecipients administer their projects and programs in accordance with all CDBG-DR rules and regulations. Additionally, OCD-DRU provides training to grantees and subrecipients on how to use the Grantee Administrative Manual.

Finally, there is monitoring of all grantees and subrecipients. This involves both desktop and onsite monitoring. **Appendix J** contains OCD-DRU's Long-Term Compliance and Monitoring Plan, which includes how projects and programs are related for monitoring on a quarterly basis. Within the Grantee Administrative Manual, OCD-DRU has provided grantees with a methodology and checklist to monitor subrecipients and contractors. OCD-DRU reviews grantee monitoring during on-site monitoring reviews.

### Internal Auditing

The grantee's internal auditor is independent; that function is provided by DOA's Internal Audit Section, which reports to the Commissioner of the Division of Administration.

The Division of Administration Internal Audit Section's Audit Charter (**Appendix K**) defines its scope of responsibilities as follows:

"The scope of the internal audit function is to determine whether the DOA's network of risk management, control and governance processes, as designed and represented by management, are adequate and functioning in a manner to ensure:

- Risks are appropriately identified and managed;
- Interaction with the various departments occurs as needed;
- Significant financial, managerial, and operating information is accurate, reliable and timely;

- Employee’s actions are in compliance with policies, standards, procedures and applicable laws and regulations;
- Resources are acquired economically, used efficiently and adequately protected;
- Programs, plans and objectives are achieved;
- Quality and continuous improvement are fostered in the DOA’s control process; and
- Significant legislative or regulatory issues impacting DOA are recognized and addressed properly.”

In the FY 2016 Internal Audit Plan (**Appendix L**), fraud is a risk factor that is considered each year as a component in the Internal Audit Section’s overall Risk Assessment for DOA, of which OCD-DRU is included.

An excerpt from the audit plan is as follows:

“In an effort to evaluate risk and identify what sections within DOA would benefit from an audit by the Internal Audit Section, we asked each section or agency head to complete a risk assessment questionnaire. The results of the questionnaires were used to help determine where audit resources should be focused in Fiscal Year 2016. In addition, this risk assessment instrument will identify where internal controls need to be strengthened and where operations within the DOA may need to become more efficient.”

The questionnaire was divided into nine areas and included several questions under each area. Each area was assigned a particular weight factor. The weight factors are reviewed each year and are based on auditor judgement and consideration of the importance of each area as it relates to risk. (See **Appendix M** for the Louisiana Division of Administration Internal Audit Risk Assessment Questionnaire).

## Capacity Assessment & Staffing

The state has conducted a thorough capacity assessment and has the current organizational structure (as shown below) in place for positions to support critical management, oversight, implementation, compliance and monitoring. Detailed job descriptions can be found at the Louisiana Department of State Civil Service’s website at <http://www.civilservice.louisiana.gov/asp/OneStopJobInfo/default.aspx>.

For capacity, OCD-DRU has been operating in CDBG-DR for over 10 years and is currently managing eight federal disaster grants including:

B-06-DG-22-0001	Hurricanes Katrina & Rita
B-06-DG-22-0002	Hurricanes Katrina & Rita

B-08-DG-22-0003	Hurricanes Katrina & Rita
B-08-DI-22-0001	Hurricanes Gustav/Ike
B-08-DN-22-0001	NSP 1
B-11-DN-22-0001	NSP 3
B-13-DS-22-0001	Hurricane Isaac
B-13-DS-22-0002	National Disaster Resiliency

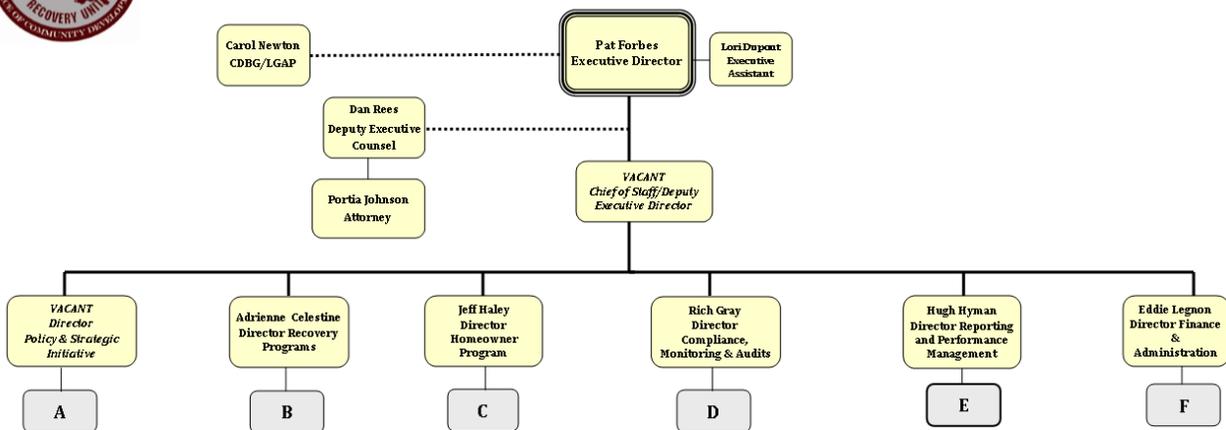
Last year, the Finance Division processed over 3,000 draw request totaling over \$232 million in payments to grantees and vendors. The average length of time for employees at OCD-DRU is greater than five years. The average length of time for senior management is greater than five years.

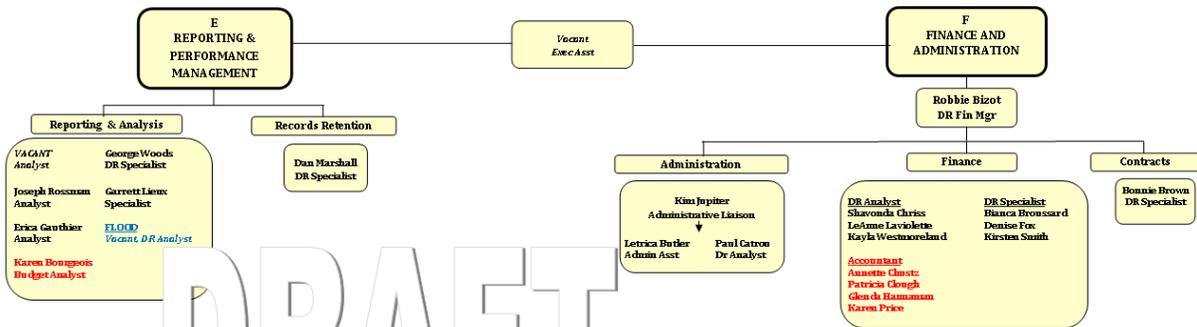
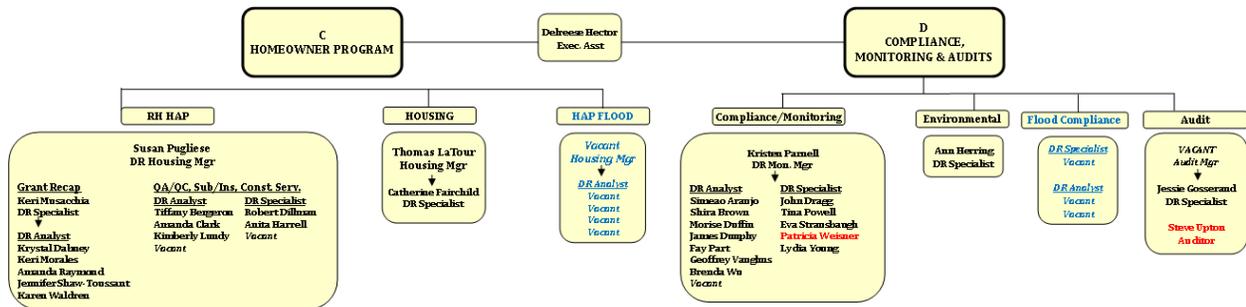
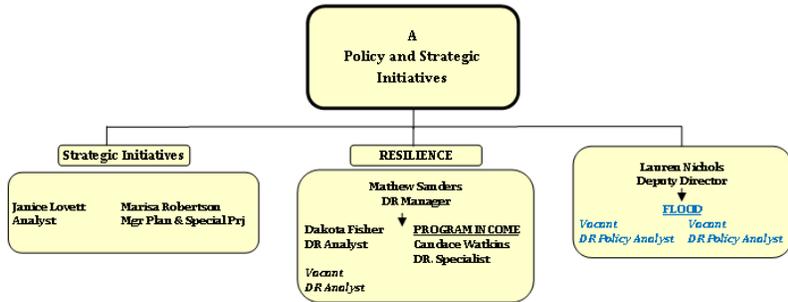
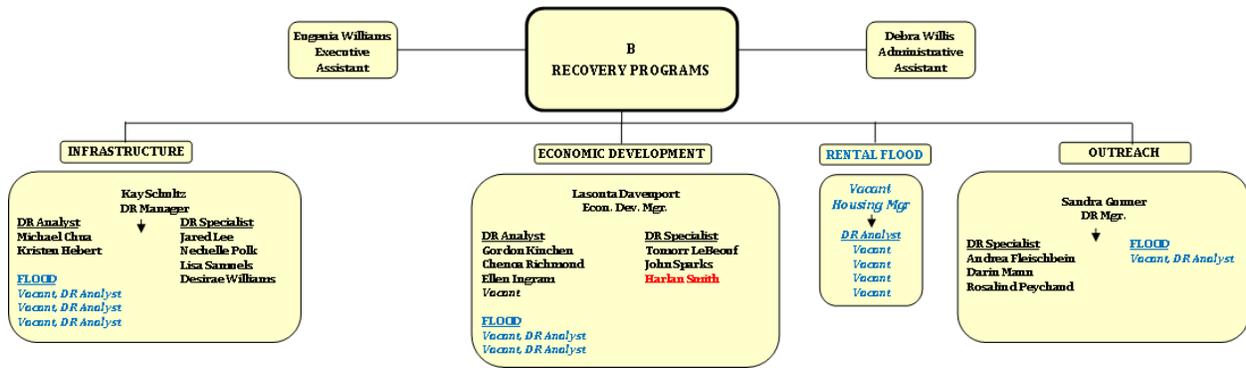
OCD-DRU currently has over 80 full time employees to manage the eight current grants and the upcoming flooding grant(s), we currently have twenty five vacancies, including twenty one listed under Flood Recovery. Of the twenty one vacant positions listed under Flood Recovery, nine have been posted, the application period has expired and applicants are being interviewed for hire. The anticipated date for filling these vacancies will be within the next 30 – 60 days. OCD-DRU does not anticipate any delays in the recovery process resulting from any vacancies due to the depth and experience of the existing staff. OCD-DRU will manage its staffing to ensure that all grants have adequate resources, including staffing, to fulfill its mission as outlined in the Action Plan.

Below is a DRAFT Organization Chart for OCD-DRU. Once the vacancies have been filled, an updated Organization Chart will be forward to HUD for review.



### Disaster Recovery Unit Organization Chart





DRAFT

## Internal and Interagency Coordination

The State will procure a qualified vendor to provide program management services to all housing program applicants. OCD-DRU will manage the contractor by providing a dedicated OCD-DRU liaison as identified in the vendor contract. The contractor will be required to have knowledge, experience and/or skills to work with applicants to determine eligibility and duplication of benefits, as well as have a basic knowledge of data base management applications to support the management of applicant files. Contractor will provide applicants with first-line communication to inform them of their obligation to provide a complete and accurate program application, advise them on methods to obtain necessary eligibility documentation, answer questions about program assistance procedures and anticipated timelines, and provide them with a well-informed intake experience. The applications and the documentation collected from applicants are highly sensitive and will be handled by case management staff in a confidential manner.

OCD-DRU received a grant from FEMA to administer a Disaster Case Management Program, and has partnered with the Louisiana Department of Health to manage the provider agencies delivering the services to households. OCD-DRU has entered into direct contracts with those provider agencies. The state has leveraged partnerships throughout the recovery process and will continue to do so with various not for profits. These partners operate independently of the state, but interact daily with the very residents the CDBG-DR program is designed to serve. Their interaction with disaster-impacted residents will continue throughout the lifecycle of the CDBG-DR program, and thus, the state has designed the housing program to include continued involvement of its nonprofit groups.

Program administration will be led under the direction of the OCD-DRU Executive Director, with oversight from the Restore Louisiana Task Force, which is appointed by the Governor. OCD-DRU meets with the Louisiana Task Force at regularly scheduled public meetings to ensure effective communication between the state, public, local and regional planning officials. The state will also ensure effective communication between various departments within its organizational structure with regularly scheduled weekly staff meetings and bi-weekly manager meetings.

## Technical Assistance

Technical assistance to program participants will be provided by OCD-DRU's Outreach, Compliance and Financial staff as needed. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The state may contract with Subject Matter Experts or other Technical Assistance Providers, should sufficient demand for technical assistance warrant. For OCD-DRU employees, both existing and new, TA will be available by in-house subject matter experts as well as formal training including COSCDA training as needed.

**To ensure orderly and effective compliance with the National Historic Preservation Act during recovery undertakings, the Louisiana Office of Community Development Disaster Recovery Unit has met with**

**representatives of the State Historic Preservation Office. OCD-DRU intends to sign and execute the FEMA/HUD approved Programmatic Agreement provided by HUD. HUD, OCD-DRU and the Louisiana SHPO have discussed the processes that will be utilized ensure review and compliance with Section 106 of the NHPA where required to so. Marine Fisheries Service concerning section 7 of the Endangered Species Act prior to program implementation as required by 81 FR 39702 (2016).**

## **Accountability**

The Governor of Louisiana has designated the Division of Administration, Office of Community Development, Disaster Recovery Unit as the administrative and fiscal agent responsible to HUD for program oversight, reporting and compliance. Program administration will be led under the direction of the OCD-DRU Executive Director, with oversight from a Governor Appointed Restore Louisiana Task Force.

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