



IMPLEMENTATION PLAN & CAPACITY ASSESSMENT

SUBMITTED BY THE WEST VIRGINIA DEVELOPMENT OFFICE



POLICY CHANGES OR UPDATES TABLE

Action	Affected Section	Date
Version 1 - Approval	Entire document	10-28-2020

TABLE OF CONTENTS

POLICY CHANGES OR UPDATES TABLE	2
DEFINITIONS, ACRONYMS, AND ABBREVIATIONS	4
Introduction	5
1. Implementation & Capacity.....	5
Current Capacity to Carry Out Mitigation Objectives.....	5
Identified Capacity Gaps.....	6
Timeline to Address Gaps.....	7
Coordination with FEMA Grant Managers.....	8
Open CDBG-DR Findings and Corrective Actions.....	8
2. Staffing.....	8
Key Staffing Roles & Descriptions.....	10
3. Procedures on Application Status	13
Communication with Local Governments and Subrecipients.....	14
Application Process: Criteria & Scoring	14
Match.....	16
Frequency of Status Updates	16
Protecting Applicant Privacy	17
Citizen Complaints.....	17
4. Internal and Interagency Coordination.....	17
Coordination between State and Local Departments	17
Coordination in Developing the HMP and HMGP	17
Coordination in Implementing the Action Plan	18
Communication Between Local and Regional Planning Departments.....	18
5. Technical Assistance	18
Address Lack of Personnel	18
Fill in Knowledge Gaps	19
6. Accountability.....	20
7. Grantee’s Certification	21
Attachment A: West Virginia Community Advancement and Development Office (CAD)	22
Attachment B: West Virginia Development Office (WVDO)	23

DEFINITIONS, ACRONYMS, AND ABBREVIATIONS

- CDBG—Community Development Block Grant
- CDBG-DR—Community Development Block Grant - Disaster Recovery
- CDBG-MIT—Community Development Block Grant - Mitigation
- DHSEM—Previously the West Virginia Division of Homeland Security and Emergency Management. Currently known as the Division of Emergency Management (EMD)
- EMD—West Virginia Division of Emergency Management (formerly DHSEM – Division of Homeland Security and Emergency Management)
- FEMA—Federal Emergency Management Agency
- FRN—Federal Register Notice. The Federal Register Notice for CDBG-MIT funds was published August 30, 2019 (84 FR 45838)
- GIP—General Infrastructure Program
- HMGP—Hazard Mitigation Grant Program
- HMP—Hazard Mitigation Plan
- HUD—U.S. Department of Housing & Urban Development
- HUD MID—Most Impacted and Distressed areas as determined by HUD in the CDBG-MIT Federal Register Notice (84 FR 45838)
- LMI—Low- to Moderate-Income. An income of less than 80% of the local area median income (AMI)
- MIDs—Most Impacted and Distressed areas
- MNA—Mitigation Needs Assessment (also, Risk-Based Mitigation Needs Assessment)
- RPDC—Regional Planning and Development Council
- SHMO—State Hazard Mitigation Officer
- SRO—State Resiliency Office
- State MID—Most Impacted and Distressed areas as determined by the State of West Virginia, based on the Presidentially Declared counties in FEMA Disaster Declaration DR-4273
- Subrecipient—A unit of general local government or other eligible applicant that has applied for and been awarded a grant by the West Virginia Development Office
- WVCAD—West Virginia Office of Community Advancement and Development
- WVDO—West Virginia Development Office
- UGLG—Units of General Local Government. Cities, counties, towns, villages and other general-purpose political subdivisions of a state

Introduction

The State of West Virginia is the recipient of **\$106,494,000** in Community Development Block Grant Mitigation (CDBG-MIT) funds. The funding will be used to address mitigation; defined as activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

The Federal Register Notice allocating the CDBG-MIT funds requires that the State prepare an Implementation Plan for the use of the CDBG-MIT funds and conduct a Capacity Assessment of the State's ability to implement and manage the proposed activities, provide management and financial oversight of the expenditure of the funds, and meet the U.S. Department of Housing and Urban Development's (HUD) reporting and compliance requirements. The West Virginia Development Office (WVDO) provides this *Implementation Plan* in accordance with the CDBG-MIT Federal Register Notice 84 FR 45838 issued August 30, 2019.

1. Implementation & Capacity

The Community Advancement and Development office (CAD) is a division within the WVDO and currently administers multiple programs funded by HUD financial assistance. Annually, CAD receives and administers federal grants such as CDBG, CDBG-DR, ESG, HOPWA, and NSP. With these funds, the CAD office assists with access to housing, creates and retains jobs, develops critical infrastructure and public facilities, promotes fair housing, and supports planning that leads to more livable communities and economic opportunity.

The CAD office administers state and federal programs, within four units: Infrastructure, Sustainability, Resiliency, and Compliance. Other positions in the larger WVDO support the function of CAD by providing finance and procurement operations. With many years of staff experience with CDBG, CDBG-DR, the Appalachian Regional Commission (ARC), and other federal grants collectively, CAD has established the financial controls, procurement processes, and adequate procedures to ensure proper stewardship of public funds and to mitigate noncompliance and detect and prevent fraud, waste, and abuse of funds. CAD can effectively manage the CDBG-MIT grant, ensure timely expenditure of funds, maintain a comprehensive website regarding all disaster recovery activities assisted with this grant, and ensure timely communication of application status to applicants for disaster recovery assistance.

Current Capacity to Carry Out Mitigation Objectives

Given the successful management of previous CDBG programs and projects, CAD's CDBG team is confident that the organizational and staffing structure will provide most of the necessary support for successful implementation and compliant oversight of the CDBG-MIT grant. As per the CAD organizational chart ([Attachment A](#)), there are currently 41 full-time positions across management and the four units (Resiliency, Sustainability, Infrastructure, and Compliance). Staff roles include Senior Management, the Program Manager, Unit Managers, CDBG-MIT Project Managers, Policy and Planning Specialist, GIS Specialist and Compliance Monitors. Additional support services would be provided to complete Environmental Reviews, Financial Management, and CDBG/CDBG-DR Program Operations. CAD plans to hire two new staff members and transition four full-time staff to the CDBG-MIT program. The staff and the method for transitioning them is explained further in the sections below.

Identified Capacity Gaps

To ensure that WVDO continues to manage the programs as a responsible steward, several positions in various disciplines will be added to CAD to support the management of the CDBG-MIT grant. The CDBG team utilized HUD’s staffing worksheet and identified the following gaps with Staff Capacity to fully manage its CDBG, CDBG-DR, and CDBG-MIT subrecipients and activities.

One important assumption is that CAD and WVDO can spend down a large portion of the money within the first six years. Possible risks to that assumption is that CAD will be dependent on the number of “quality” projects submitted after the release of each RFP, the efficacy of each project to be successful, subrecipients’ capacity and ability to stay on schedule, and the number and type of CAD staff dedicated to CDBG-MIT at any point in time. A higher number of good projects submitted within the first year will be pivotal in getting CAD’s CDBG-MIT funding disbursed to the subrecipients and spending on schedule.

It is currently anticipated that two CDBG-MIT Project Manager positions will be brought into the team to address program management gaps. More detail on how existing CDBG-DR staff will transition to support CDBG-MIT activities is written in the next section. As the program passes certain milestones, CAD will reevaluate staffing needs annually to determine when to transition certain positions, if additional hires are necessary, or whether to augment staff with a consultant or contract positions.

Area of Need	Current Staff Support	Identified Gap (FTEs)	Capacity Description
Grants Management	<ul style="list-style-type: none"> • Sherry Risk • Michelle Penalosa • James Bush 	No Gap Identified	<ul style="list-style-type: none"> • Manage program progress, risks, communication, complaints • Manage strategic partnerships (funders, agencies, regional councils) • Recommend projects for approval • Oversee MIT Advisory Council
Financial Management & Planning	<ul style="list-style-type: none"> • Lisa Fisher • Alex Phares • Kristin Warner 	No Gap Identified	<ul style="list-style-type: none"> • Review and process payments/ invoices • Manage DRGR • Track project and program budgets • WVDO Finance and Reporting will provide support and processing role
Procurement & Contract Management	<ul style="list-style-type: none"> • Kelli Compton • Kim Miller 	No Gap Identified	<ul style="list-style-type: none"> • Maintain procurements and contract registry
Data Systems & Reporting	<ul style="list-style-type: none"> ▪ Jacob Wolfe 	No Gap Identified	<ul style="list-style-type: none"> • Recently hired a CDBG-MIT Project Manager for GIS mapping analysis and data research
Training	<ul style="list-style-type: none"> • Sherry Risk • Alex Phares • Tidal Basin (2 staff) 	No Gap Identified	<ul style="list-style-type: none"> • Develop and manage policy and procedures manual • Identify ongoing training needs, develop training plan for MIT staff, and implement training
Compliance & Monitoring	<ul style="list-style-type: none"> • Jeremy Hutchinson • Dave Rabel • Westley Smolder 	No Gap Identified	<ul style="list-style-type: none"> • Conduct internal and external monitoring • CAD will assign one staff who will allocate their time across CDBG-MIT and CDBG-DR. If needed at a later time, another staff will be assigned.

Human Resources	<ul style="list-style-type: none"> • WVDO human resources 	No Gap Identified	<ul style="list-style-type: none"> • Separate department to support this need
Communications & Outreach	<ul style="list-style-type: none"> • Leanne Thompson • Alex Phares • Kristin Warner 	No Gap Identified	<ul style="list-style-type: none"> • Manage website • Manage DRGR and QPR reporting
Program Operations: General Infrastructure	<ul style="list-style-type: none"> ▪ Oversee operations of the General Infrastructure Program 	Project Manager (1 FTE)	<ul style="list-style-type: none"> • Oversee operations of General Infrastructure Program • Manage projects from approval to closeout
Program Operations: Public Facility Hardening	<ul style="list-style-type: none"> ▪ Oversee operations of the Public Facility Hardening Program 	Project Manager (1 FTE)	<ul style="list-style-type: none"> • Oversee operations of the Public Facility Hardening Program • Manage projects from approval to closeout
Program Operations: Planning	<ul style="list-style-type: none"> ▪ Jacob Wolfe 	No Gap Identified	<ul style="list-style-type: none"> • Oversee operations of the Planning Program • Manage projects from approval to closeout

Timeline to Address Gaps/ Method for Transitioning Existing Staff to CDBG-MIT

CAD has made two recent CDBG-MIT hires: Jacob Wolfe and Alex Phares. These staff will initially support the CDBG-DR program and then transition full-time into CDBG-MIT once the Action Plan is approved. There will be a total of four full-time staff members who will gradually transition from CDBG-DR to CDBG-MIT (Jacob Wolfe, Alex Phares, Kristin Warner, and Wesley Smolder). To provide additional coverage for MIT programs, CAD will hire two Project Managers based on the table above .

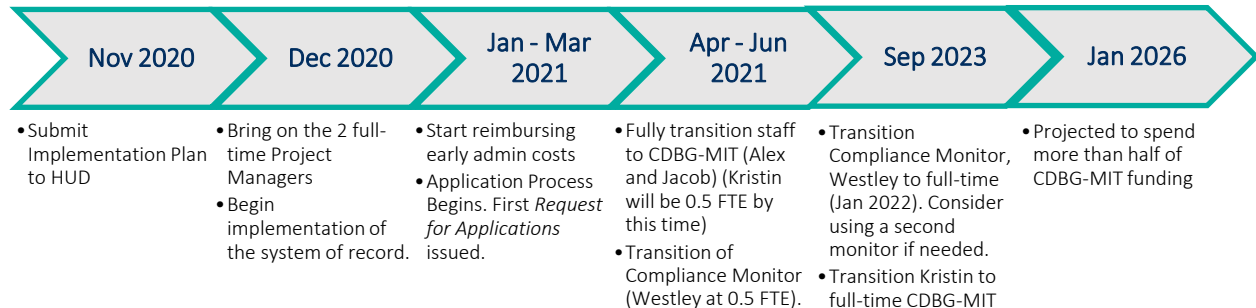
CAD is actively accepting applicants for the two CDBG-MIT positions available: a General Infrastructure Program Project Manager and a Public Facility Hardening Project Manager. The CDBG-MIT Project Managers job postings have been posted as of October 2020. The expectation is that the positions will be filled by December 2020. CAD anticipates that the request for applications will be released by March 2021 and will be due by June 2021.

Because many of CAD’s existing staff will either transition from CDBG-DR to CDBG-MIT or allocate a portion of their time for both, CAD will manage this transition and ensure that people are working on CDBG-MIT tasks when needed and appropriate. CAD needs to make sure they can receive applications, have the capacity to review and award the grants to approved applications, and support other grant management functions. Relative to the CDBG-DR program, CAD is assuming that there will be fewer projects to manage under the CDBG-MIT program. The application process will begin around March 2021 and projects initially awarded are expected to start finishing around mid-2024 (CDBG-MIT Action Plan Appendix E: 12 Year Projections).

CAD Director, Infrastructure, Resiliency, and Compliance Unit Managers will be conducting annual assessments on staffing capacity internally to ensure that there is adequate staff to support the CDBG-MIT grant: processing applications, project management, conducting monthly fiscal meetings with the CAD CFO on maintaining grant expenditure projections, and monitoring functions. The assessments will indicate whether staffing assignments need to be changed, how much time current staff dedicate to CDBG-MIT, if new staff need to be hired, and utilize their contract with Tidal Basin to augment staff needs when needed.

CAD has also procured a new computer system that will be helpful in tracking applications and managing CDBG-MIT reimbursements (see more details in [Section 5](#)). With the new hires, grant system, and Tidal Basin, CAD should have the capacity to manage the CDBG-MIT application process, oversee projects until closeout, and address the risks to project completion.

Timeline Chart



Coordination with FEMA Grant Managers

The WVDO staff are administering CDBG-DR and CDBG-MIT grants, which provides a foundation for effective communication, coordination, and knowledge of HUD crosscutting requirements between the grant funds. WVDO’s CDBG-MIT staff will be able to tap into those existing resources in order to adequately meet the requirements of the grant.

For FEMA-funded projects, the FEMA funds are routed through West Virginia’s Department of Homeland Security and are administered by the Division of Emergency Management (EMD). Typically, the CDBG-DR staff meet with FEMA bi-weekly to discuss HMGP policy and matching on housing programs. By tapping into this existing relationship and resources, CAD can continue to coordinate with FEMA grant managers on projects that may require both FEMA mitigation and CDBG-MIT funding sources to ensure that CDBG-MIT grant requirements are met.

As part of the application process for the General Infrastructure Program, the units of local government will be able to provide information for FEMA 404 Hazard Mitigation projects that were withdrawn. CAD will prioritize these projects and implement a second review to determine eligibility for CDBG-MIT funding. To manage project reviews, CAD staff and the five Regional Planning and Development Councils (RPDCs) have a standing project meeting, once a month, accompanied by EMD and FEMA.

Open CDBG-DR Findings and Corrective Actions

From HUD’s June 2019 onsite monitoring visit, the State was found to not be operating the CDBG-DR housing recovery program in compliance with its approved Implementation Plan. Within 90 days of HUD issuing the monitoring report, the State was required to submit to HUD a revised Implementation Plan and staff Capacity Assessment. On August 8, 2020 CAD addressed the last open finding from the June 2019 CDBG-DR monitoring. In October 2020, CAD was notified by HUD that all the June 2019 monitoring findings have been resolved and closed.

2. Staffing

To preserve the use of administrative funding for the full 12-year span, CAD will hire additional staff when a clear need is identified. Additional staff augmentation will be provided by Tidal Basin through an existing

contract and CAD has also expanded trainings and cross-training for existing staff. CAD has made the following assessment of the staff's capacity to fulfill the following roles as they relate to the management and oversight of the CDBG-MIT program.

Case Management: CAD is implementing the CDBG-MIT programs through a competitive application process to allocate funds to Units of General Local Government (UGLG), RPDCs, Public Service Districts, and subsequent Non-Profits and Higher Education. These eligible applicants will take responsibility of managing the program while CAD staff oversee and monitor their progress. Based on the logistics of the programs, the Department would not require Case Management for individuals.

Project Managers: For each of the main programs, CAD will have a Project Manager on staff to provide oversight and technical assistance for the allocated funds. Each Project Manager will be assigned to provide ongoing technical assistance to the subrecipients, monitor activities for compliance, and tracking performance measures. Similar to the CDBG program, RPDCs can also offer additional technical assistance and project management skills that can assist cities and counties in developing their applications to the CDBG-MIT programs.

Implementation of Mitigation: Several key CAD staff have extensive experience with CDBG, NSP, and CDBG-DR rules and regulations that are also applicable to CDBG-MIT (Program and Project Managers). Others bring experience on how to evaluate infrastructure specific projects and manage federal grants which will be relevant for the General Infrastructure Program (Infrastructure Unit Manager and CDBG Program and Project Managers). CAD will also look to tap into the knowledge from its various contractors (Tidal Basin, Capital Access, and SBP). Technical assistance will be provided from Capital Access by HUD for key areas of the program for CDBG-DR, and CDBG-MIT staff. Tidal Basin will provide assistance regarding mitigation and how to ensure compliance with HUD's requirements for mitigation projects. Tidal Basin will develop the program application materials and policies and procedures.

Procurement/ Contract Management: Similar to the CDBG and CDBG-DR grant, CAD will follow the State's procurement and contracting processes. The State Procurement Officer at CAD works directly with the Division of Purchasing on all purchases and procurements. For goods or services with a total cost of \$25,000 or greater, WVDO will complete an approval form and obtain the signature of the CAD Director and the agency's Procurement Officer. Approval must be obtained by the Cabinet Secretary, or the Deputy, or other assigned designee. The Agency's Procurement Officer will submit required documents to the Division of Purchasing within the Department of Administration, unless a specific exemption has been granted by the Division of Purchasing. Eligible subrecipients (UGLG, RPDCs, Public Service Districts, Non-Profits and Higher Education) will be required to follow federal procurement (2 CFR 200) regulations or West Virginia State Procurement rules.

Section 3 & FHEO Compliance: CAD staff (Program Manager and Project Manager) can provide guidance to eligible applicants regarding Section 3 requirements and how to comply with Fair Housing. CAD has established a Section 3 plan for CDBG and CDBG-DR and can utilize that plan to advise on procedures related to CDBG-MIT. CAD also named Jacob Wolfe (CDBG-MIT Project Manager) as the FHEO person assigned to CDBG-MIT programs. When needed, Tidal Basin will provide trainings and technical assistance to CAD.

Environmental Compliance: The Infrastructure and Compliance Units under WVDO (Compliance Unit Manager and Infrastructure Managers), can assist with ensuring program compliance with Environmental Reviews and Clearance (see organizational chart, [Attachment B](#) for designated staff). WVDO will also rely upon the Regional Planning and Development Councils (or regional councils) to coordinate and conduct

environmental reviews and compliance. The regional councils routinely do this for the infrastructure projects that WVDO funds through other federal programs (including the regular CDBG program) and therefore have extensive experience in environmental compliance for federal construction projects. Tidal Basin will also provide trainings and technical assistance as requested by CAD. If applicable for the Public Hardening program, CAD's two Lead Based Paint Specialists in the Sustainability Unit will be asked to support the CDBG-MIT grant.

Monitoring & Quality Assurance: CAD's dedicated Compliance Unit will perform routine reviews of program participants, subrecipients, and/or contractors, as applicable, to ensure the projects funded are implemented by CAD in complete compliance with all CDBG-MIT program requirements. The CAD Compliance Unit already has experience in monitoring CDBG and CDBG-DR programs that provide experience with the necessary policies, systems, and procedures that consider HUD program rules and regulations, civil rights, environmental and labor standards, Fair Housing, Section 3, citizen participation, reporting, and recordkeeping requirements. Key staff (Compliance Unit Manager and the Compliance Monitor) will be pulled to assist with oversight of the CDBG-MIT program (see organizational chart, [Attachment A](#) for designated staff).

Financial Management: To guarantee the proper disbursement of funds, CAD will rely on the support of the Finance and Reporting Unit at WVDO (see organizational chart, [Attachment B](#) for designated staff). Other key staff (Project Managers, Program Specialist, and Program Managers) bring experience with HUD's grant management systems of IDIS and DRGR that enables CAD to effectively manage and report on the progress of CDBG-MIT funds.

Independent Audit Staff: CAD has an existing auditor (Dave Rabel - see organizational chart, [Attachment B](#)) for CDBG-DR who reports to the Secretary of Commerce at WVDO and is separate from the functions of CDBG-DR and CDBG-MIT. The Internal Auditor's role is to ensure effective grant management and ensure accuracy of information, while helping to avoid findings and concerns from the Office of the Inspector General (OIG) and findings or concerns from the HUD monitoring visits. By monitoring, analyzing, and assessing the risks and controls of the organization, the auditor can provide ongoing assurance that the grantee is maintaining internal controls in order to comply with laws, regulations, and provisions of contract agreements.

Key Staffing Roles & Descriptions

WVDO LEADERSHIP

Jennifer Ferrell, Director: Provides leadership to all federal grants received within the CAD division and communicates the State general directives from the Governor's Office, Cabinet Secretary, and the WVDO's Executive Director.

James Bush, Infrastructure Unit Manager: Manages the Infrastructure Unit within CAD which includes the regular CDBG program as well as several other federal grant programs. Provides strategic direction of CDBG-MIT priorities and coordination with several federal and state grant programs that can be leveraged with CDBG-MIT funds.

Michelle Tharp Penaloza, CDBG-DR Program Manager/Resiliency Unit Manager: Ensures that the program activities align to the State general directives, strategic policy decisions and prioritization. This position directs, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the State, while following Federal Register Notices CDBG-DR/MIT regulations and technical assistance to the State Resiliency Office.

CDBG-MIT Program (CAD)

Sherry Risk, CDBG/MIT Program Manager: The CDBG/CDBG-MIT Program Manager was hired to provide technical assistance to the CDBG-DR program to facilitate the initial implementation of the Clearance and Demolition Program, the Multifamily Housing Program, and Riverview. Due to the strong foundation built on policy design, project managers for CDBG-DR are now providing oversight for these programs. Through the efforts of the CDBG/CDBG-MIT Program Manager, the State's 2020-2024 Consolidated Plan was also written, updated, and approved by HUD. Directs, implements, coordinates, and advocates mitigation and resiliency goals, objectives, and outcomes by the State. Focuses on engaging the State, County, Municipal and Community leaders to educate, inform, and gain assistance in the mitigation process. Directly oversees the execution of the Mitigation Program delivery. Prepares amendments and other policy documents to support the MIT program delivery.

Ryan Halsey, CDBG Project Manager: Responsible for the work products and project lifecycle in the CDBG program. Manages various complex projects under the direction of higher-level management. Overall administrative support and communication for CDBG projects. Prepares all project contracts, implementation, payments, project review from application to project completion. Supports as needed evaluation of policies to ensure alignment with the Action Plan and CAPER. Assists in the preparation of the Action Plan and CAPER. The CDBG Project Manager will provide technical assistance to the MIT Project Managers as needed during the lifetime of the MIT grant.

Kristin Warner, DRGR/HMGP Specialist (1 FTE): The current CDBG-DR HMGP Program Specialist (transitioning to CDBG-MIT/DRGR Specialist) reports directly to the CDBG-DR/MIT Program Manager. This CDBG-MIT DRGR Specialist is responsible for the management of DRGR reporting, Action Plan updates, projections, and expenditure reporting, along with Section 3. Primary objective is to compile Quarterly Performance Reports and report weekly expenditure amounts for each program. DRGR reporting for MIT will be the primary responsibility of the DRGR Specialist. Annual milestones will be evaluated for the MIT program and staff will be augmented or hired for DRGR responsibilities. HMGP responsibilities for MIT projects will be transitioned to Project Managers during the first year of the MIT grant. The expectation is that this role will transition 100 percent to CDBG-MIT by Q3 2023. Prior to that, CAD will rely on other existing staff to support with the DRGR reporting functions (Alex Phares).

Leanne Thompson, CDBG-DR/MIT Constituent Services: The CDBG-DR/MIT Constituent Services position serves as the Ombudsman for WVDO. This position manages the process for providing accurate and timely interaction and response to constituents which have been brought to attention from the Governor's Office, HUD, and other leadership positions within the State. This position also communicates and facilitates processes in support of updating website content for CDBG-MIT. This position will meet weekly with the MIT Program Manager and MIT project Managers during the first year of the MIT grant. This staff is expected to dedicate only a portion of their time to CDBG-MIT.

Alexandria Phares, CDBG-MIT Policy and Procedure Manager (1 FTE): The Policy and Procedure Manager for CDBG-MIT is responsible for developing and updating manuals, policies and procedures that interpret applicable Federal and State statutes, Action Plans, rules and regulations governing Community Development Block Grant MIT. Alex will begin transitioning during the first quarter of 2021 to CDBG-MIT from the CDBG-DR program. This CDBG-MIT role will coordinate the implementation, updating of infrastructure policies and procedures, DRGR and QPR reporting, and training with the MIT Project Managers. This role is also vital for ensuring that CAD can reimburse costs for early staffing work related to

administration of the grant and preliminary planning activities. Starting at 50 percent utilization for CDBG-MIT, this role will be 100 percent transitioned to CDBG-MIT by Q2 2021.

Jacob Wolfe, CDBG-MIT Project Manager (1 FTE): CDBG-DR/MIT Program Specialist reports directly to the Program Manager. This CDBG-DR/MIT Program Specialist is responsible for assisting in analyzing data for all projects, GIS mapping and leading the demolition program. Jacob will begin transitioning to MIT during the first quarter of 2021 to become the Planning Project Manager and oversee the planning program in MIT. In addition, he will research and collect data related on historical or future risk. The data will be used to map facilities in the flood plain and other critical lifeline services to better identify hazard risks, impacts to reduction of risk and loss of life. Data analysis will review what has been done, what is remaining, and fixing discrepancies in the collected data. The transition will be 100 percent by Q2 2021.

CDBG-MIT General Infrastructure Program Project Manager (1 FTE - Vacant): Overall management, operations, administrative support, and communication for General Infrastructure projects. Provides recommendations on projects and manages projects from approval to closeout. Responsible for project management techniques, including preparing required documents and processing payment requests. Leads the development of coordination and evaluations of policies to ensure project lifecycle and outcomes are in alignment with the MIT Action Plan. This position is expected to be 100 percent dedicated to CDBG-MIT.

CDBG-MIT Public Facility Hardening Program Project Manager (1 FTE - Vacant): Oversee operations and provide administrative support and communication for Public Facility Hardening projects. Provides recommendations on projects and manages projects from approval to closeout. Responsible for project management techniques, including preparing required documents and processing payment requests. Leads the development of coordination and evaluations of policies to ensure project lifecycle and outcomes are in alignment with the MIT Action Plan. This position is expected to be 100 percent dedicated to CDBG-MIT.

COMPLIANCE UNIT (CAD)

Jeremy Hutchinson, Compliance Manager: The Compliance Manager is the lead member of the WVDO Compliance and Monitoring Team who is responsible for ensuring adequate monitoring occurs for all WVDO programs. The Compliance Manager tracks all compliance monitoring efforts and provides technical assistance to Program participants and/or Compliance Monitors during onsite monitoring reviews.

Theresa Harrison, CDBG-DR/MIT Monitor: CDBG-DR/MIT Compliance Monitor is the member of the WVDO staff who manages compliance activities for all CDBG-DR/MIT programs and projects; includes monitoring performed for the State and its subrecipients. This analyst will support the CDBG-DR program but may transition to the CDBG-MIT program when a need is defined through the annual assessments.

Westley Smolder, CDBG-DR/MIT Monitor (1 FTE): CDBG-DR/MIT Compliance Monitor is the member of the WVDO staff who manages compliance activities for all CDBG-DR/MIT programs and projects; includes monitoring performed for the State and its subrecipients. This monitor will split their time 50/50 between CDBG-DR and CDBG-MIT to start. By 2022, the monitor will transition 100 percent to CDBG-MIT and assist with quality control and quality assurance reviews on programs during implementation.

ENVIRONMENTAL UNIT (WVDO)

David Dyer, LBP Specialist CAD: The LBP Specialist CAD position performs complex monitoring function of subrecipients who receive federal funds to operate the Weatherization Assistance Program. The complex

monitoring assures compliance with the grant requirements and provide technical assistance is as necessary to ensure that grant funds were properly spent, and that appropriate records are maintained.

Jeremiah Ramsey, LBP Specialist CAD: The LBP Specialist CAD position performs complex monitoring function of subrecipients who receive federal funds to operate the Weatherization Assistance Program. The complex monitoring assures compliance with the grant requirements and provide technical assistance is as necessary to ensure that grant funds were properly spent, and that appropriate records are maintained.

FINANCE AND REPORTING UNIT (WVDO)

Steve Meester, Director, Administrative Services: The Director is responsible for overall financial management of all activities within WVDO; currently responsible for certain federal reports for WVDO; and, responsible for payroll management for six divisions within the Department of Commerce. The Director has Cabinet level approval for budget documents for all eleven divisions within Commerce.

Lisa Fisher, Chief Financial Officer: The Chief Financial Officer of WVDO/CAD is responsible for all financial activities within WVDO/CAD. Oversight responsibilities include monitoring of grant expenditures, allowable expenditures, financial reporting, contract payments to contractors and subrecipients, grant reconciliations, and federal reporting

Andrew Mihallik, Accountant CAD: The Accountant provides all support necessary to the Chief Financial Officer of the WVDO/CAD regarding financial management and oversight of federally funded activities.

Kimberly Miller, Procurement Officer CAD: The Procurement Officer is the liaison for WVDO/CAD for the WV Division of Purchasing. The Procurement Officer acts as the first person of contact when the agency is needing to purchase. Procurement officers ensure that all purchases are in compliance with West Virginia state laws/codes. Procurement officers are responsible in gathering proper documentation and creating contracts for vendors and for keeping track of the agency's inventory.

Kelli Compton, Procurement Officer CAD: The Procurement Officer is the liaison for WVDO/CAD for the WV Division of Purchasing. The Procurement Officer acts as the first person of contact when the agency is needing to purchase. Procurement officers ensure that all purchases are in compliance with West Virginia state laws/codes. Procurement officers are responsible in gathering proper documentation and creating contracts for vendors specifically for the CDBG-DR/MIT programs.

3. Procedures on Application Status

The specific activities funded by the CDBG-MIT grant and set forth in the Action Plan include:

- [Infrastructure] General Infrastructure Program
- [Infrastructure] Public Facility Hardening Program
- [Planning] State Planning
- [Planning] Regional/Local Planning
- [Planning] Hazard Mitigation Plans

The State will administer an infrastructure mitigation program. For applications submitted by UGLGs, RPDCs, and Public Service Districts to access the funding, CAD will prioritize providing timely information

regarding the status. As per the Federal Register Notice, CAD will also prioritize 50% of the funding to projects in the HUD MID designated areas: Greenbrier, Clay, Kanawha, and Nicholas Counties.

CAD expects to spend down a majority of the funding in the first 6 years of the grant. CAD will release multiple Request for Applications to encourage subrecipients to submit applications. Applicants will be asked to submit applications during the initial release on March 2021. Expenditures against the CBG-MIT grant are projected to start around Q3 or Q4 for the programs. The challenge is to have adequate staff in place, manage the distribution of labor across the CDBG-DR and CDBG-MIT programs, and track the application process and the progress on programs. More staff will be added to the CDBG-MIT roster to ensure that the program is adequately supported.

Communication with Local Governments and Subrecipients

Program applicants will have the opportunity to be provided their application status at any time during operational hours by contacting the CAD point of contact via phone, submitting an email (CDBGMitigation@wv.gov) inquiry to CAD, or utilizing the mitigation website (www.wvfloodrecovery.com/mitigation/). Additional details on communication with local governments and subrecipients can be read in [Section 4](#).

CAD Point of Contact	Title	Email	Phone No.
Sherry Risk	CDBG Program Manager	sherry.l.risk@wv.gov	304-957-2068
Jacob Wolfe	CDBG Project Manager	jacob.h.wolfe@wv.gov	304-957-2116

** Contact info for the 2 MIT project managers will be posted upon hiring.*

Application Process: Criteria & Scoring

GENERAL INFRASTRUCTURE PROGRAM (GIP)

Once the Action Plan is approved by HUD, CAD will release a Request for Applications in the first quarter of 2021. Subsequent Request for Applications may be release depending on the level of unobligated balances after the first Request for Applications. The process will be repeated in the first quarter of subsequent years. Funding will be dispersed annually, until all funds are exhausted. CAD will look to distribute as much money as possible during this first year for projects that are considered ready-to-proceed. Technical Assistance will be provided for projects close to ready-to-proceed in order to increase viability and develop a pipeline of projects. This approach will be duplicated each year to expediate the development of projects and timely obligation and expenditure of funds. Eligible applicants will be invited to submit applications that propose funding GIP projects by the CDBG-MIT Program. Responses will be evaluated to ensure the proposed projects meet the minimum criteria as outlined in the GIP Program Guidelines and application materials. Responses that meet minimum threshold requirements will then be evaluated according to the scoring criteria outlined below.

For subrecipients considered to be in a project-design phase, CAD will provide planning and technical assistance to help the applicants further develop their projects and get them into the pipeline . CAD will ensure that there is appropriate tracking and enforcement language included in the Subrecipient Agreement to meet expenditure deadlines. Considering time constraints for dealing with environmental, and oversight and monitoring issues, each submitted project is assumed to take 3 years to complete.

Applications must, at a high level, describe their infrastructure project and address how it will serve to mitigate risks attributable to hazards identified in the State of West Virginia Action Plan, Risk-Based

Mitigation Needs Assessment, and benefit low-to-moderate income populations. Applicants must also include a proposed budget with a detailed description of anticipated costs by category, including support services and program management and administration. Applications will be evaluated to determine the mitigation value and cost effectiveness of the proposed project. An applicant’s planning strategy and management capacity must be evident.

Each scored element of the applications is included in a Criteria Evaluation Rubric and has a value associated with it. A total of 150 points are available. If eligible applications exceed available funding, applicants will be funded in rank order based on evaluation scores. CAD reserves the option to fund all, a portion of, or none of each application submitted by an applicant. The scoring criteria is listed below in its order of importance.

CDBG-MIT Scoring Criteria	Maximum Points (150)
Mitigation Impact	25
Project Description	20
Quantity of Protection	15
Readiness to Proceed	15
Capacity	15
LMI Priority	15
HUD MID Areas Served	10
Implementation Plan	10
Leverage	10
Investment Linkage	10
Vulnerable Populations	5

PUBLIC FACILITIES HARDENING PROGRAM (PFHP)

This program will allow UGLGs and State agencies to harden public buildings that serve a public safety purpose for local communities. CAD expects to distribute a majority of the funding within the first six (6) years of the grant. Examples of hardening include dry flood proofing, wet flood proofing, anchoring roof-mounted heating, shelters, ventilation and air-conditioning units and retrofitting building exteriors with hazard-resistant materials in accordance with national safety standards. Eligible public facilities include potable water facilities, wastewater facilities, police departments, fire departments, hospitals, schools, emergency operation centers and emergency shelters. Similar to GIP, eligible applicants will submit applications for CDBG-MIT funding. Responses will be evaluated using the same scoring criteria used for GIP to determine the mitigation value and cost effectiveness of the proposed project.

PLANNING GRANTS

The CDBG-MIT Planning allocation is \$15,000,000 and will be used to support local, regional and statewide mitigation planning efforts. Planning funding can be used for: land use planning, hazard mitigation planning, modernization and resiliency planning, upgrading mapping capabilities, and other plans. For the Regional/Local Planning and Hazard Mitigation Planning, CAD intends to accept applications year-round. Spending through these programs is expected to continue for most of the life expectancy of the grant. Additional information and details about the application process as it pertains to these can be found in the West Virginia’s CDBG-MIT Action Plan.

Match

The CDBG Program does not require a match; however, credit will be given for leveraged funds during the review process. Leveraging funds can be a way to maximize the impact of CDBG-MIT funds and promote partnerships with other entities. Sources of leveraged funding can include the following:

- Community Development Block Grant (CDBG)
- Land and Water Conservation Fund (LWCF)
- Weatherization Assistance Program (WAP)
- Community Development Block Grant – Disaster Recovery (CDBG-DR)
- Infrastructure and Jobs Development Council (IJDC) Grants and Loan
- Drinking Water Revolving Loan Funds (DWTRF)
- Clean Water Revolving Loan Funds (CWSRF)
- West Virginia Water Development Authority
- Local Lending Institutions
- Local Funds
- Private Resources
- State Resources
- U.S. Department of Agriculture – Rural Development
- Appalachian Regional Commission Federal Grant Programs (ARC)
- U.S. Economic Development Authority
- U.S. Army Corps of Engineers

Frequency of Status Updates

Application materials will be posted to the CAD CDBG-MIT website (<https://wvfloodrecovery.com/mitigation/>). CAD will accept and process applications from eligible applicants for eligible CDBG-MIT projects. Once applications are submitted by the deadline, applicants will receive a confirmation of receipt, and the applications will be classified as “Pending” until a decision is made. CAD will review the applications, make recommendations to the Governor’s Office, and inform applicants regarding the status of their application.

Currently, CAD expects that around 30 applications may be submitted for review. To address any issues with backlog of applications awaiting determinations, the plan is to implement a new system of record by Q1 2021 that will facilitate the review of applications. Along with the transition of staff from the existing CBG-DR program additional assistance may be provided through Tidal Basin to assist where needed.

Applicants who have questions or require assistance with their application can reach out to CDBGMitigation@wv.gov or contact the following CDBG-MIT staff at CAD:

Name	Title	Email	Phone No.
Sherry Risk	CDBG Program Manager	sherry.l.risk@wv.gov	304-957-2068
Jacob Wolfe	CDBG Project Manager	jacob.h.wolfe@wv.gov	304-957-2116

**Contact info for the 2 MIT project managers will be posted upon hiring. Until they are hired, CAD has existing staff who can administer associated work based on existing CDBG-MIT polices and procedures.*

The CDBG mitigation website will have the contact info (telephone number and email address) available on the website. The CDBG mitigation website will also have information about grant cycles, application deadlines, and any other pertinent press releases. Applicants can check on the status of their applications

at any time. Questions received about application status during the application review period will be answered within 48 hours of their receipt.

Protecting Applicant Privacy

CAD guarantees the protection of applicant Personally Identifiable Information (PII). CAD staff will enact necessary measures to ensure that any PII of applicants is safeguarded as to avoid release of private information. If a contractor or employee should experience any loss or potential loss of PII, CAD shall be notified within 3 hours of the breach or potential breach. Potential losses of PII may occur in forms such as:

- loss of a computer or electronic device containing PII,
- loss or compromise of paper containing PII, or
- loss of electronic communication containing PII

If CAD should be notified of loss or potential loss of PII, efforts will be undertaken on a case-by-case basis to ensure the recovery of said information. The Director and employees treat all information received confidentially. CAD requires all employees to sign a Confidentiality Agreement upon employment by the Agency and shall adhere to the agreement and all regulations set forth by the West Virginia Executive Branch Confidentiality Agreement and the West Virginia Ethics Act.

Citizen Complaints

If there are any issues or complaints that are received during or after the application process, CAD's Administrative Assistant will direct them to the appropriate Project Manager. The Project Manager will look to resolve complaints in a timely manner, usually within fifteen (15) business days, if practicable, and to provide applicants the right to participate in the process and appeal a decision when there is reason for an applicant to believe their application was not handled according to the program policies. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

4. Internal and Interagency Coordination

CAD will be responsible for managing the mitigation funding, but mitigation is relevant to how other West Virginia agencies operate and is becoming an important part of the conversation with local governments and their constituents. West Virginia's CDBG team will hold several reoccurring meetings, weekly and monthly, to address internal and interagency coordination.

Coordination between State and Local Departments

To facilitate project development and ensure that awarded projects stay on schedule for completion, CAD will institute regular monthly meetings with the 5 RPDC's that cover the 12 eligible counties. WVDO will hold monthly meetings with the RPDCs. RPDCs will also be able to invite their local units of government as needed to these meetings. As state above, CAD will also hold monthly meetings. Another monthly meeting will be held with the Division of Emergency Management (previously the Division of Homeland Security and Emergency Management (DSHEM), but as of May 29, 2020 known as EMD) and the State Resiliency Office (SRO).

Coordination in Developing the HMP and HMGP

As part of the application process for the General Infrastructure program, WVDO will consider projects that may have an HMGP component and were not initially funded from the Federal Disaster 4273 (2016

Flooding, Landslides, and Mudslides). WVDO will hold monthly coordination meetings with the EMD and the SRO. EMD will lead the state's response to manmade or natural disasters, ensuring the protection of life and property by providing coordination, guidance, support and assistance to local emergency managers and first responders. The coordination meetings will provide the opportunity to develop programs and strategize how to address mitigation in the state.

Coordination in Implementing the Action Plan

Eligible subrecipients will be UGLGs, RPDCs, Public Service Districts, Non-Profits, or Higher Education. Each subrecipient will be assigned a CDBG-MIT Project Manager who will report to the CDGB-MIT Program Manager. There will be weekly internal meetings with Project Managers and weekly updates with the CAD Director, Infrastructure Unit Manager, and Resiliency Unit Manager. These meetings will cover the status of projects and progress on the overall CDBG-MIT grant. There will also be monthly meetings with the RPDCs. Meetings will include an update on project scheduling, challenges implementing mitigation activities listed in the Action Plan, etc.

Communication Between Local and Regional Planning Departments

Consideration of local and regional planning efforts remains a key consideration in the implementation of activities funded by the CDBG-MIT grant. As stated above, CAD will include RPDCs and stakeholders in monthly meetings with Project Managers to discuss planning related activities.

Following West Virginia's Citizen Participation Plan, quarterly advisory meetings will cover proposed plans, updates, questions, or concerns regarding the mitigation planning efforts. To continue building valuable insight from the public, WVDO will provide routine opportunities for citizens to provide input regarding all activities overseen by the State and funded by the CDBG-MIT grant. Stakeholders will also be able to access additional information by monitoring the mitigation website to locate the latest CDBG-MIT program guidance and policy. Link: <https://wvfloodrecovery.com/mitigation/>

5. Technical Assistance

Address Lack of Personnel

As stated in the prior section, Implementation and Capacity, WVDO has the necessary staff members to implement the CDBG-MIT grant. Additional staffing is accounted in current hiring processes and will provide additional program management support for specific CDBG-MIT programs and compliance that ensure that grants funds are spent appropriately.

HUD has procured Capital Access, a private consulting firm, and WVDO has procured Tidal Basin, another private consulting firm, who have extensive experience in the implementation and oversight of CDBG, CDBG-DR, and CDBG-MIT grants. The scope of the work will include providing technical assistance upon request to current WVDO staff members. Should WVDO determine that a knowledge gap or technical expertise is lacking, a request will be made for technical assistance from its procured contractor and/or HUD. WVDO will build upon the CDBG knowledge gained from any technical assistance received to continue the development of expertise to oversee future CDBG-related funding administered by WVDO. Expertise will be sought after for the following areas:

- Application
- Program Policies and Procedures
- Monitoring

- Computer system implementation
- Training for subgrantees

Fill in Knowledge Gaps

WVDO recognizes the value of timely and pertinent technical assistance specific to the program requirements associated with the CDBG-MIT grant. The agency will ensure that staff have adequate knowledge for managing the CDBG-MIT program during the course of the grant through:

- **Ongoing Technical Assistance with HUD:** WVDO has initiated ongoing technical assistance meetings with HUD bi-monthly to ensure that the State is administering a CDBG-MIT program that is both in compliance with federal regulations and streamlined for efficiency. There will be a standing meeting weekly with Capital Access, a local HUD CDBG-DR/MIT technical assistance assigned to West Virginia. A training schedule is being developed with Capital Access. As CAD begins to implement the grant, Capital Access will help reevaluate staffing capacity to address future capacity gaps if applicable and offer guidance and solutions on DRGR data management.
- **Staff Training:** HUD has procured Capital Access and WVDO has procured Tidal Basin to offer program guidance and direct the agency on the best way to setup programs, administer the funds, and train staff. Tidal Basin will bring needed support to staff and make the implementation of the CDBG-MIT grant easier by providing program administration tools, designing the actual application forms, and writing policies and procedures manuals.
 - Tidal Basin has been assisting CAD since June 2020 and Capital Access has started training since September 2020.
 - CAD began in 2018 with the regular cross training of CDBG-DR staff and the establishment of a CAD training plan which are transferable to CDBG-MIT.
- **System of Record:** The WVDO has secured a data project management system that is built upon the Salesforce Solution platform which manages hundreds of thousands of clients and projects. This system has served thousands of disaster recovery clients and continues to expand to meet other unmet and emerging needs in southeastern Texas and in Grand Bahama following Hurricane Dorian. In addition to the basis product, the contract master agreement includes the task of building additional workflow processes/modules as needed to meet the needs of WVDO and the CDBG-MIT requirements. Once contracts are signed, the implementation of the system is expected to begin around December to January 2021.
- **Conferences/Workshops:** WVDO staff have attended regular trainings administered by HUD and other entities, such as SBP (formerly known as St. Bernard Project). These workshops have been important for other grants (e.g., CDBG-DR) in decreasing the time of recovery post-disaster. Other workshops have helped WVDO staff understand how to run critical programs and include the following:
 - DRGR Training – Austin, November 2018
 - CDBG-DR HUD Problem Solving Clinic – Atlanta, December 2018
 - 2 CFR 200 – Roanoke, February 2019
 - DRGR Training – Atlanta, June 2019
 - CDBG-DR HUD Problem Solving Clinic – Kansas City, July 2019
 - Fair Housing Conference – Chicago (Summer 2019)
 - HUD Environmental Training – Charleston, WV, September 2019

- Texas GLO Synergy in Disaster Recovery – Austin, November 2019
- SBP Leader Practitioner Course – New Orleans, January 2020
- 2 CFR 200 – Orlando, January 2020
- SBP Acquisition and Buyout – July 2020
- HUD CPD Environmental Training August 2020
- HUD online training for DR/MIT series occurring September to October 2020

Training and technical assistance will be provided to new staff, RPDCs, and/or new participants to the program and will be designed to help all program stakeholders navigate the complex housing and community development challenges by equipping the entire team with the knowledge, skills, tools, capacity, and systems to implement the HUD programs and policies successfully.

To ensure that successful program implementation is sustained over the life of the grant, staff will share resources and contents received from these trainings with other staff working on programs and projects funded by the CDBG-MIT. In addition to sharing the knowledge gained from disaster recovery specific trainings, WVDO will also continue to use the library and resources available on the HUD Exchange.

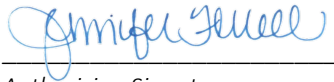
6. Accountability

The Office of Community Advancement and Development (CAD), a division of the West Virginia Development Office (WVDO), under West Virginia’s Department of Commerce (WVDOC) has been designated to currently administer multiple grant programs funded by HUD. With the support of the West Virginia Development Office (WVDO), CAD will administer the day-to-day operations of the CDBG-MIT programs.

- *Jennifer Ferrell* is the **CAD Director** and reports directly to the Executive Director of the WVDO and Secretary of Commerce who, in turn, report to the Office of the Governor. Jennifer briefs both the Executive Director and Secretary of Commerce on program progress and major decisions.
- *Mike Graney* is **WVDO’s Executive Director**. He signs off on major decisions and reports directly to the Secretary of Commerce.
- *Ed Gaunch* is **WVDOC’s Cabinet Secretary**. He reports to the Governor’s office and coordinates with the Executive Director to align grant implementation with the state’s strategic goals.

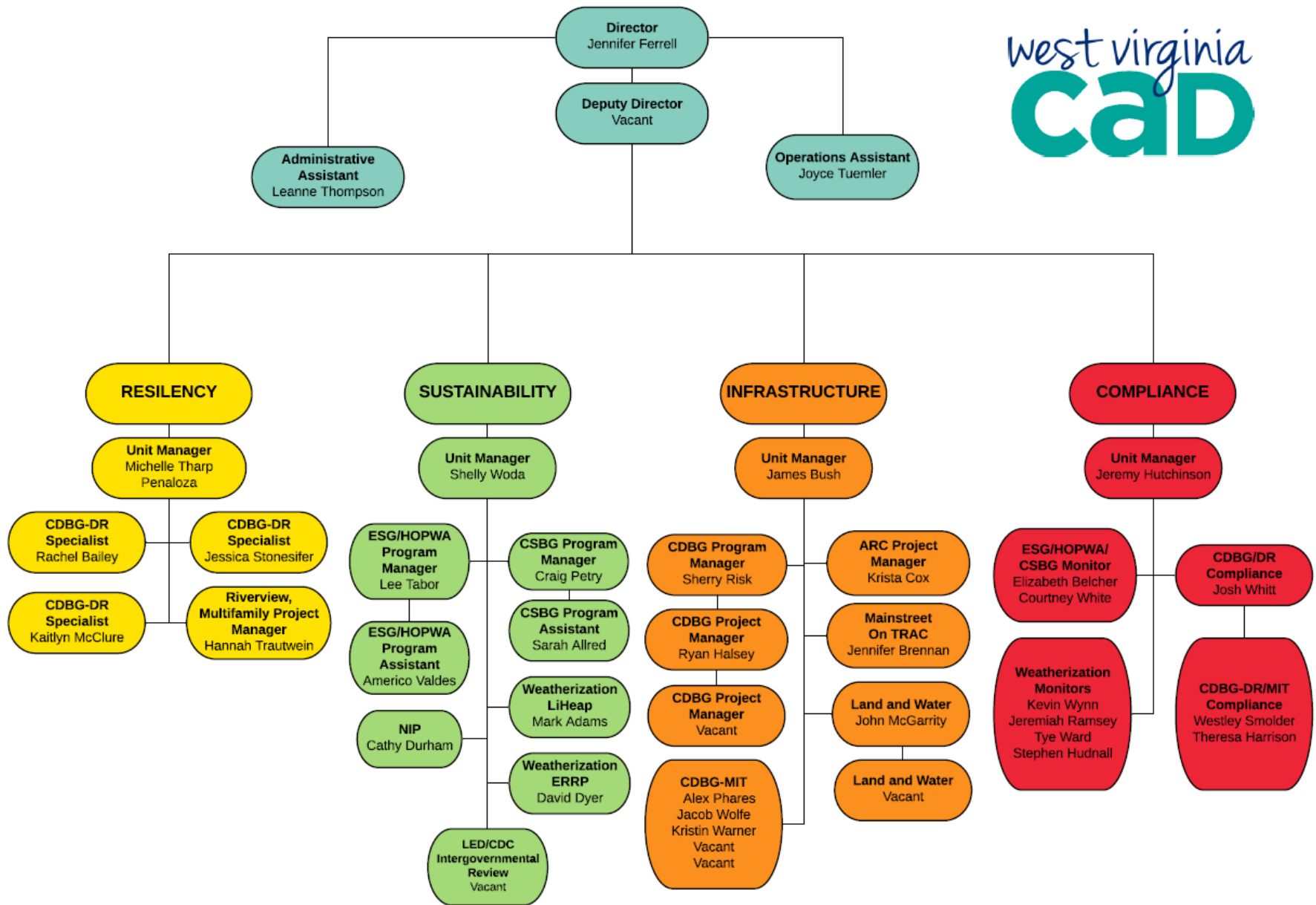
7. Grantee's Certification

The WVDO certifies to the accuracy and validity of the evaluation of its internal risk and management capacity, as attested to by executing the P.L. 115-123 Financial Management and Grant Compliance Certification for All Grantees Receiving CDBG-MIT Funds (October 2020), submitted with this Certification Documentation and Implementation Plan.

A handwritten signature in blue ink, appearing to read "Jennifer Huel", written over a horizontal line.

Authorizing Signature

Attachment A: West Virginia Community Advancement and Development Office (CAD)



Updated: October 2020

LEGEND:	TEAL Admin/Management	YELLOW Resiliency	GREEN Sustainability	ORANGE Infrastructure	RED Compliance
----------------	------------------------------	--------------------------	-----------------------------	------------------------------	-----------------------

Attachment B: West Virginia Development Office (WVDO)

