
Lexington County

Community Development Block Grant Disaster Recovery

Risk Assessment Documentation & Pre-Award Implementation Plan

Community Development Block Grant Disaster Recovery Funds
Authorized by the Disaster Relief Appropriations Act, 2016 PL 114-113
U.S. Department of Housing and Urban Development
Federal Register Notice 5928-N-01

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Purpose

Per the *Public Law 114-113 Guide for Review of Financial Management of CDBG-DR Grantees*, “each grantee must submit Risk Analysis Documentation to demonstrate in advance of signing a grant agreement that it has in place proficient controls, procedures, and management capacity”. This is inclusive of the grantee’s ability to prevent duplication of benefits as defined by Section 312 of the Stafford Act as well as demonstration that the grantee “can effectively manage the funds, ensure timely expenditure of funds, maintain a comprehensive website regarding all disaster recovery activities assisted with these funds, and ensure timely communication of application status to applicants for disaster recovery assistance”. Finally, the grantee must demonstrate that it has adequate policies and procedures to detect and prevent fraud, waste and abuse.

In addition to the financial management review, each grantee is required to submit an Implementation Plan to describe the grantee’s capacity to carry out the recovery, including the operational and program management functions relative to CDBG-DR funding. Any capacity gaps must be identified and filled based on the plan and timeline outlined by the grantee.

This document has been prepared in compliance with these requirements and constitutes the County of Lexington’s *Risk Analysis Documentation & Implementation Plan* (Plan). The Plan establishes how the County will effectively and responsibly manage grant funds in compliance with the financial requirements in Subparts D and F of 2 CFR part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. It will demonstrate that the County has all necessary systems, guidance, and policies and procedures to uphold its duty in the administration of these funds and that the County will continue to develop and refine these policies throughout the CDBG-DR grant lifecycle. It will also demonstrate that the County has the capacity to deliver benefits to affected citizens in a timely and compliant manner.

Risk Analysis Documentation

Financial Controls & Procurement Processes

As a recipient of federal funds, the County is subject to the Single Audit Act of 1984, as amended in 1996. The Single Audit act, which standardizes requirements for auditing federal programs, requires review of all federal programs by an independent Certified Public Accountant (CPA) for compliance with program requirements and proper expenditure of funds. All findings of the Single Audit are reported directly from the CPA to the County Administrator.

The County is submitting its most recent Single Audit produced in response to the most recent audit conducted in accordance with 2 CFR part 200, subpart F, and its most recent financial statement prepared in accordance with 2 CFR 200.510. Neither the Single Audit nor financial statement indicate that the County has material weaknesses, significant deficiencies, or questioned costs.

The Department of Finance has completed *P.L. 114-113 Guide for Review of Financial Management*. This checklist is provided along with the County's latest financial statement and a copy of the county's Fiscal Policy as well as the County's Procurement Ordinance. The County Department of Finance affirms that it has the requisite financial controls in place to account for and properly manage the CDBG-DR funding in a manner that is consistent with all federal and local accounting requirements.

Procedures to Prevent Duplication of Benefits

Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss as to which he/she has already received financial assistance under any other program, private insurance, charitable assistance or any other source. Such duplicative funding is called Duplication of Benefit (DOB). This prohibition laid out in the Robert T. Stafford Act (Stafford Act), as amended, is a significant added layer of regulation not found within the County's entitlement CDBG program. This is a new regulation with which the County will comply for its CDBG-DR grant.

Pursuant to the Stafford Act, the County will establish and follow policies and procedures to uphold the safeguard against DOB within its program guidelines for each eligible activity. Understanding that prevention of DOB is especially critical in the context of housing programs and in anticipation that some form of housing assistance will be identified to fulfill unmet disaster recovery needs at the conclusion of the County's Action Plan development process, the County has established a framework for identifying potentially duplicative sources of funds and reducing documented duplications from potential project awards prior to any award actually being made.

During the application period and eligibility determination, a case manager will document all sources of funds received or approved from private insurance, SBA, FEMA and / or volunteer organizations (including in kind assistance) used for the same purpose that the CDBG-DR award will be intended. Once all sources have been identified and after determining an applicant's remaining unmet recovery need, any sources of funds previously received for the same recovery need will be deducted except where those funds were spent on activities that are excludable per Stafford Act and HUD guidance, sometimes known or referred to as Allowable Activities. Allowable Activities will not result in a reduction of the final award. Additionally, per the Federal Register Notice and longstanding HUD guidance, forced mortgage payoffs will not be considered duplicative as those funds were never available to the applicant.

We understand that applicant benefits from FEMA, SBA, and insurance can be a moving target with additional funds received much later than initial payouts or due to appeals and litigation. Further, all funding sources may not be known at the time of application. Therefore, the County of Lexington will continuously monitor program applicants and perform its due diligence to verify benefits that may have been secured from FEMA, SBA, private insurers, charitable contributions and any other available financial assistance after the date of application. Late or additional benefits from other sources can also result in a change the outcome of the award amount for which an applicant is ultimately eligible and applicant awards may have to be adjusted as new sources are identified to prevent DOB and minimize recapture.

The County is in the process of securing FEMA and SBA data that it will use as a part of its DOB analysis and is working to put agreements in place to obtain updated data feeds. Further, the County has already established relationships with volunteer organizations that have provided assistance to disaster affected citizens. The County will work to leverage these relationships and applicant release forms to obtain additional DOB data from philanthropic sources.

As a part of its case management process, the County will require applicants to execute an Application for Assistance, which will include:

- Income Certification,
- Insurance Certification,
- Philanthropic Release of Information and
- Subrogation Agreement,

These documents will become part of each applicant's record. Furthermore, these documents will hold each applicant accountable to the accuracy of information provided and also give the County recourse if it is determined at a later time that applicants received other financial assistance that was not identified at the time of application. If a duplication of benefit arises within the term of the applicant benefit delivery and compliance/monitoring period, The County of Lexington will adhere to the guidelines set forth in OMB Circular A-87 and the Stafford Act (chapter 37 of title 31) for the recapture of funds. Beneficiaries of CDBG-DR program funds will be informed of fund recapture in an agreement executed with the County if it is determined that a DOB exists. The County of Lexington Department of Community Development will bear responsibility for ensuring compliance with DOB regulatory requirements at the eligibility stage and for monitoring latent additional funding sources.

Timely Expenditure of the Funds

Per Federal Register Notice 5938-N-01, CDBG-DR funds must be expended within a six (6) year time frame beginning on the date the grant agreement is signed by HUD. However, we understand that HUD will periodically review the County's progress in drawing down funding from its Line of Credit (LOC). The County of Lexington will review in-house expenditures and beneficiary expenditures to ensure that funds are spent on eligible costs and in a timely manner. Project funds and schedules will be monitored by The County of Lexington's Finance Department, the Department of Community Development, the County's planning and management consultant(s) and ultimately audited through the County's independent audit function.

As the County of Lexington is an entitlement community, County staff members already have experience with monitoring the expenditure rate of its annual CDBG allocation. (The County's CDBG Policies & Procedures are provided as an appendix to this document.) With the County's current allocation of CDBG funds, The County of Lexington's Department of Community Development maintains detailed spreadsheets monitoring the expenditure of funds and project schedules. Considering that the CDBG-DR grant to the County is more significantly than the usual annual allocation, the County will adapt and enhance its current processes by establishing standard tracking mechanisms, processes and templates to ensure consistency and continuity among program activities. The County of Lexington will also maximize its use of technology to support and augment any standard processes instituted to ensure timely expenditure of funds.

The County of Lexington will hold all contractors accountable through the establishment of benchmarks and other critical milestones. Contractors will be required to provide detailed reports concerning expenditure of funds and project progress to the County upon its request. Frequency of reporting will be established on a per project basis given the potential varied nature of eligible activities that the County may choose. It is expected that the County will require contractors to provide monthly reports; however, due to the varying nature of each project, specific projects may be asked to provide those project updates more frequently.

The County expects, at this time, that it will administer all CDBG-DR programs and will use contractor augmentation to execute implementation. When contracting with vendors or other recipients, the County will establish certain benchmarks that must be achieved prior to the release of funding. As a part of its contractual obligations to the County, contractors will be required to present the County with a plan on how they will implement procedures to reach the determined benchmarks. Each contract with contractors will require that penalties be implemented for failure to reach benchmarks. In addition to ensuring that contractors are meeting project timelines, these benchmarks will allow the County to project expenditures for each individual project.

Per Federal Register Notice 5938-N-01, The County of Lexington will submit a projection of expenditures and an outcomes plan to HUD within 120 days after the initial Action Plan has been submitted through the DRGR system. Revised projections will be sent to HUD when program changes impact projected outcomes, funding levels and recovery timelines. We understand that HUD will use this information to track the County's proposed versus actual performance. It will serve as a tool to measure overall performance as well as project-specific performance. The County will aggressively monitor its contractors, using benchmarks, milestones and projections as a means to prevent bottlenecks in the process while also minimizing delays in expending funds for eligible project activities.

Management of Funds

Utilizing intake personnel, we will walk each applicant through the application process, ensuring that all required documentation and information is included in the application packet. Specifically, staff that has been trained to address the issue of "Duplication of Benefits" will evaluate the information provided to determine what, if any, duplication may occur. Additionally, those staff members will contact insurance companies, FEMA/Emergency Management staff, NFIP, etc. to verify the information provided by the applicant. We will also utilize a positive, on-going relationship with the United Way of the Midlands to determine and/or verify any efforts of VOAD's on behalf of the applicant. We anticipate that staff completing these functions will be provided by a contracted vendor and individual training documentation will be required.

At the County of Lexington, we have a monitoring process which includes several layers of approvals before funds are expended, in essence, allowing us to "monitor" the use of funds on an individual basis. This process includes multi-level review of the use of funds. These reviews occur throughout the organization, from the front-line contractor(s) up through the Community Development Director (CDD), the procurement office and ultimately by the County's Chief Financial Officer (CFO). The CDD and the CFO each answers directly to the County Administrator. At each level of the process, there is an evaluation made to determine that the use of funds is legitimate and in keeping with the requirements of the governing policies, procedures, rules, regulations, ordinances and laws. If any other determination is reached, the use of funds is delayed until further information is obtained. If the additional information does not result in a positive determination, the use of funds for that purpose will not be allowed.

Comprehensive Website

The County of Lexington is in the process of creating a website to keep the public informed about flood recovery activity and resources. The website will be maintained by the County's Public Information Office. It will be accessible through the County's main page of the County Government website. The County will maintain this website throughout the full recovery period. It will serve as the primary repository of information for the County's disaster recovery actions and resources and will contain links to all action plans, action plan amendments, quarterly performance reports (QPRs), citizen participation plan, procurement policies, procurement notices/advertisements, notices of public meetings, executed contracts, activity/program information for activities described in the action plan and other information relevant to the CDBG-DR program funds. Updates to the dedicated disaster recovery website will be made in conjunction with any new activity associated with the CDBG-DR program action plan and funds. Constituents will be able to lodge complaints via an email link on the website. That email address will be monitored daily. The County will respond promptly within fifteen (15) days of receipt of each complaint. The Assistant Program Manager of CDBG-DR will monitor the email address, log all complaints and coordinate to provide the response.

All documents will be made available in a language other than English upon request.

A quarterly performance report (QPR) will be submitted to HUD no later than 30 days following the end of each quarter after grant award and continuing until all funds have been expended and all expenditures have been reported. No less than three (3) days prior to submitting to HUD, the County will post the QPR to the website for public comment. In addition to these required reports, the County will also post its procurement policies, executed CDBG-DR contracts as well as the status of services or goods currently being procured by the County.

Timely information on application status

Effective communication is paramount to the successful delivery of complex public programs, particularly in the wake of a disaster. The County of Lexington will, at a minimum, engage in a two-tiered applicant communication strategy, with larger program-wide information being made available on the County's disaster recovery website and proactive case management to move applicants along within program processes, notifying applicants of status at each critical juncture.

The County of Lexington believes that an effective and comprehensive communications strategy will better allow community access to create a culture of personal resilience and sustainability. The County has been proactive in engaging the community and keeping them informed of disaster recovery efforts transpiring within the community in an effort to create this culture, using the disaster recovery website as a clearinghouse of resources for community stakeholders. The County intends to maintain this website as the central repository of information to connect citizens to resources available from the CDBG-DR program activities we undertake.

The County understands that a lack of information about program resources, progress, filed claims, and applications for assistance can exacerbate frustration from potential program beneficiaries. Further, the processes required to deliver benefits, particularly in housing related activities, are multi-step complex processes that require extensive documentation. The incremental steps within a program require time, and often patience. To mitigate the anxiety of applicants and keep them apprised of application progress, The County of Lexington will need to institute systems that allow for real-time status updates to applicants upon request. Although the County will not know the volume of case management needed until the conclusion of the Unmet Needs Assessment and Action Plan development, we anticipate instituting the following status update options:

- Providing direct access to an applicant's designated case manager
- Monitor case manager caseloads and adjust as necessary to keep caseloads at reasonable levels that will ensure frequent applicant contact
- Sending electronic status notifications after critical milestones have been achieved as well as outlining next steps
- Sending printed status updates to applicants who do not have access to electronic media
- Face-to-face consultations with case managers
- After-hours voicemail systems monitored daily and instituting a policy of return calls within 24-hours of voicemail receipt
- Case manager email contact information provided to applicants

One additional status related issue that applicants may experience is a program decision that the applicant considers to be adverse. The County will institute both a complaint and an appeals process to address citizen concerns and applicant grievances.

Complaints or grievances will be reviewed and a response will be issued within fifteen (15) business days, as required by HUD in the Federal Register notice. Where a complaint or grievance cannot be resolved within fifteen days, the aggrieved party will be notified, in writing, of the expected timeline or process for resolution. Applicants will be notified of the complaint process at application intake and information about the complaint process will be posted to the County's disaster recovery website.

Appeals of program decisions will be acknowledged within fifteen (15) days of receipt and resolved according to the appeals process that will be developed for each of the program activities the County chooses to undertake. Applicants will be notified, in writing, of their opportunity to appeal decisions and the process for appealing at the application stage of the process. They will be reminded of their right to appeal through details provided on all program status notifications. Information about the appeals process will also be posted to the County's disaster recovery website.

Pre-Award Implementation Plan

Capacity Assessment

Since 2000, The County of Lexington has received an average annual allocation of approximately \$1,000,000 in CDBG entitlement funds. The County typically uses its program dollars to support three broad program areas including: homeownership assistance and rehabilitation, emergency home repair, neighborhood revitalization, public improvements, and public services activities.

Through the delivery of these programs, County staff members have already delivered programs in compliance with many of the regulatory requirements mandated under Federal Register Notice 5398-N-01 for CDBG-DR funding because they overlay the CDBG Entitlement Program. However, there are some additional regulations and/or alternative requirements that the County will be required to implement as a part of the CDBG-DR program. Although the County has the general programmatic and financial infrastructure in place, it will need additional support to efficiently manage the \$16.3 million allocation under the CDBG-DR program. The County understands that it will need supplemental staffing and has already undertaken steps to secure this support. Further determinations to add staff members will be made upon identification of the activities the County will undertake with the CDBG-DR funds.

The County has hired a planning and program administration consultant to assist with the Action Plan and Needs Assessment. The County also understands that it will have to undertake program management responsibilities covering various activities potentially in the areas of housing, infrastructure and economic development. Due to the County's limited staffing capacity, it does envision hiring and procuring the necessary staffing and expertise to augment the County's current staff. The County anticipates acquiring both direct staff members and supplemental staff through the hired consultant in a staged manner to ramp up operations as needed, rather than hiring *en masse* prior to the signing of the grant agreement. By creating a staged hiring strategy, the County can most effectively conserve and use its limited resources.

The County plans to use professional consultants to assist with carrying out activities under the grant. The consultants will provide technical assistance to County staff, assist with developing standard operating procedures as well as program policies and procedures, provide environmental review, estimating and inspection services, assist with general program management and provide other resources as necessary to fulfill the County's obligations under the grant. The priorities identified during the Action Planning process will assist in the County's assessment as to the resources that may be needed to support program management functions. The County has already hired a consultant to support its Action Plan process and to provide some auxiliary services to support activities in connection with program planning. The County's consultant(s) will provide the following services:

- Environmental Review

- Inspection and Cost Estimating
- Title & Appraisal Services
- Intake Application Review including Duplication of Benefits
- Case Managers
- Uniform Relocation Act Assistance

Below is a general timeline, for the next six months, that highlights critical statutory and program milestones for the delivery of the CDBG-DR program. The timeline demonstrates the proactive steps taken to date as well as the projected timeline for ramping up additional capacity once the Action Plan is approved.

July 2016

- July 18th VOAD Stakeholders' Meeting
United Way of the Midlands
10am
- July 19th Non-profits, Civic Organizations & Schools Stakeholders' Meeting
Greater Columbia Community Relations Council
10am
- July 21st Implementation Plan due to HUD
- July 22nd Homeless, Public Housing & Veterans Stakeholders' Meeting
Columbia Housing Authority
10am
- July 28th Challedon Neighborhood Meeting
6pm @ Seven Oaks Park

August 2016

- August 1st Pineglen & Whitehall Flood Recovery Community Meeting
Lexington County Public Library – Irmo Branch
6pm
- August 15th Public Notice Published advertising Public Hearing & Public Comment Period
- August 23rd Lexington County Council – CDBG-DR Update
Lexington County Council Chambers
4:30pm
- August 29th – September 12th – 14 Day Public Comment Period

September 2016

September 20th (on or before) Action Plan Due to HUD

October 2016

Est. October 15th Vendors & Contractors Selected and In-place

Est. October 30th HUD Approval of Action Plan

November 2016

Est. November 1st Additional County Staff Members In Place

Est. November 15th Application & In-take begins for Housing Programs

Est. November 30th CDBG-DR Grant Agreement Executed w/ HUD & Treasury Account Established

December 2016

Est. December 1st First Buy-out & Rehab Contracts Signed

Est. December 5th Action Plan Entered Into IDIS

Est. December 15th First DRGR Draw of Funds

The County has also identified the various departments that will be responsible for various functions of the CDBG-DR program:

County Department or Office	Responsibility
Lexington county Administrator	General oversight of CDBG-DR program delivery. Coordination of all departments in the delivery of the CDBG-DR programs
Office of Emergency Management	Liaison between FEMA and The County of Lexington in determining preliminary damage estimates; information will be used to determine unmet need and duplication of benefits analysis; also used to connect affected citizens to resources.
Information Technology Department	Maintains website and supports technology needs of all County departments.
Public Information Office	Maintaining a comprehensive communications strategy relative to program activities.
Finance Department	Implementing financial controls and sound financial management practices to ensure timely expenditure of funds.
Procurement Department	Responsible for management of contracts associated with professional services and construction contracts to ensure compliance with contractual obligations; procurement of resources.
Department of Community Development	Coordination with departments in the delivery of the CDBG-DR programs, including program design and quality control functions associated with the implementation. Will provide general oversight for all housing programs developed inclusive of case management services and environmental compliance as it relates to housing activities. Will manage housing construction and economic development activities.
Public Works Department	Manage program activities related to infrastructure projects; assist in determining damage estimates for infrastructure activities; assist in determining appropriate resilience and sustainability measures that would potentially mitigate and/or prevent future flooding.

Staffing

Although the County has existing staff resources, it will also maximize the use of the resources available through its partners. There are organizations in the community that have been critical to the response process. These organizations already have resources in place that could be tailored to meet needs under the County's CDBG-DR programs. As the County is developing its staffing model, it will consider all options and determine what the most reasonable staffing model looks like in relation to the program activities it will undertake.

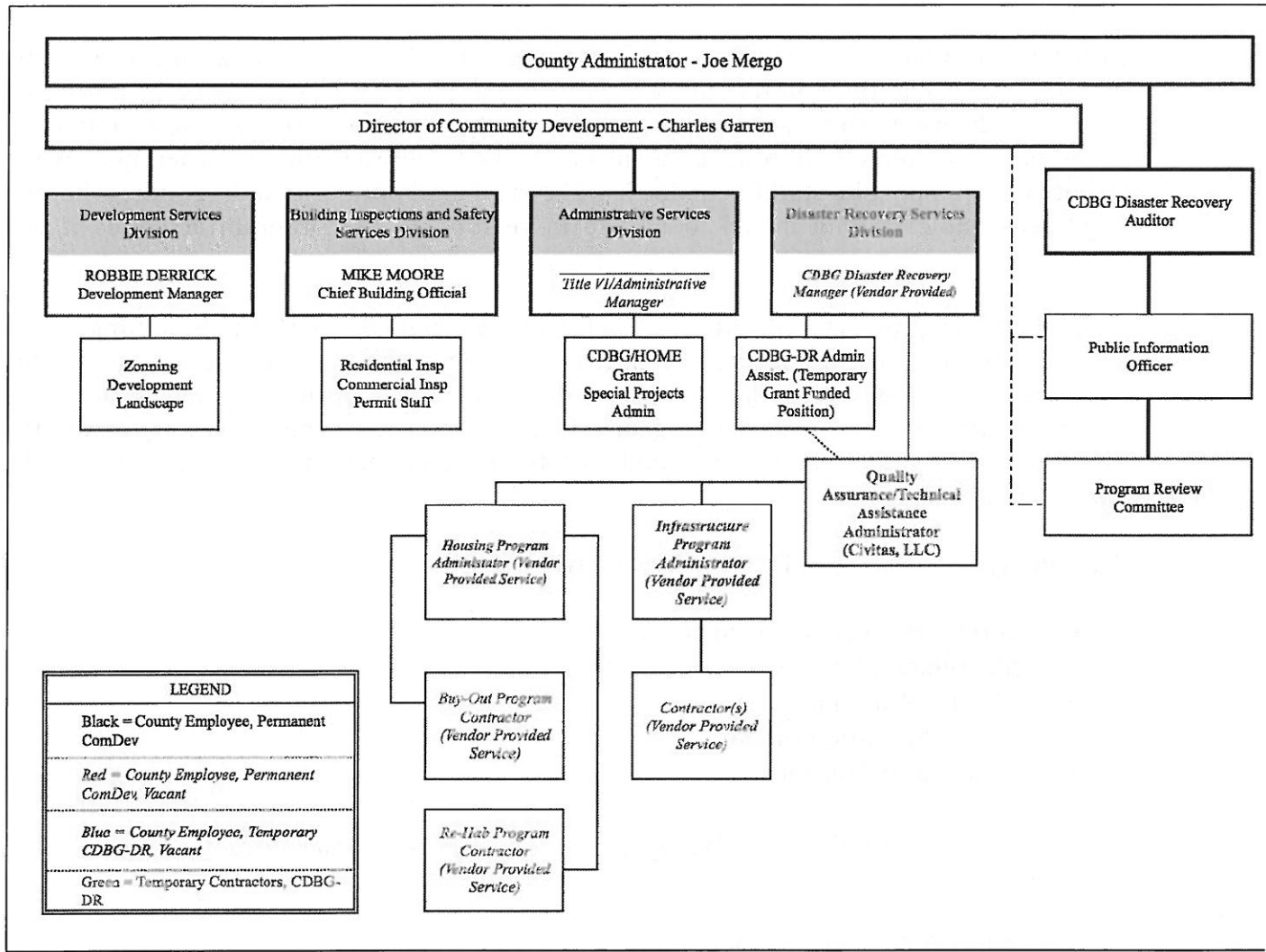
Since those program activities have not yet been determined, the County's staffing model will be flexible to accommodate the needs associated with program activities. As the programs get underway, the County will make the appropriate adjustments to accommodate the work load. The organizational chart in this section gives a visual of the various functions that will be associated with the program activities undertaken with the CDBG-DR funds.

The County has existing staff members who will fulfill the roles of:

- Information Technology Specialist
- Procurement/Contracting Specialist
- CDBG-DR Program Director
- Public Information Officer
- Public Works Manager

The County envisions hiring the following positions directly or via contractors and vendors:

- CDBG-DR Program Manager
- Independent Auditor – if required, this position will be hired through the County and accountable to the County Administrator.
- Case Managers – these will be in addition to existing staff members to augment capacity as needed, contracted through vendor(s).
- Appraisal and Title Search Specialists—these will be contracted out depending on program activity needs.
- Uniform Relocation Act Specialist—will be contracted through vendor(s) as needed depending on program activity requirements.
- Inspectors—these will be in addition to existing staff members to augment capacity as needed, contracted through vendor(s) as needed.
- Cost Estimators—will be contracted out through vendor(s).
- Environmental Review Specialist—will be contracted through vendors(s).
- Project Manager(s) – may be hired as staff or contracted through vendor(s) depending on final activity types identified in the Action Plan.



Internal & Interagency Coordination

Effective communication between and within departments is a major focus of the County of Lexington on all projects, operations and efforts. In addition to normal telephone and e-mail correspondence, the County Administrator holds a weekly Department Head/Senior Staff meeting during which he discusses important activities of the County and attendees are required to provide updates to major activities occurring in their department(s).

Additionally, specific to CDBG-DR, the proposed Organization Structure for the County of Lexington CDBG-DR team includes a "Program Review Committee". This committee is appointed by and answers to the County Administrator and will be chaired by the Director of Community Development. The membership of the committee will consist of Department Heads and/or Senior Staff and/or team leaders from the Finance Department, the Procurement Department, Public Safety (Emergency Management), County Sheriff's Department, Human Resources, Planning & GIS/Mapping, Community Development (Zoning Management, Landscape & Open Space Management, Building Inspections & Safety) and any other departments the County Administrator feels need to have a part in monitoring/reviewing the workings of the CDBG-DR program(s). This committee will meet on a regular schedule (as yet the exact schedule has not been determined) and as needed for specific issues. This committee will also serve an outlet for citizens to appeal decisions of the program staff when needed.

We understand that, while the needs for each of the many jurisdictions impacted by the 2015 Flood/Storm event are different and the make-up of the CDBG-DR program(s) for each jurisdiction will be varied, it is still very important that we be a part of a regional response to issues when possible. To this end, we will continue to meet with representatives of the other local jurisdictions and the state to discuss specific issues, especially those issues which may be common among the group. Additionally, we have created an e-mail list of interested persons and organizations that we will use to share information and to receive comments and other information. Information regarding scheduled events such as community meetings will be shared with other local governments, state agencies, school districts, non-profits and any other groups requesting to be provided this information.

Also, the County of Lexington Home Page will include a link to a page dedicated to the CDBG-DR program(s) and that page will continue to be promoted in all advertising, press releases, news interviews, public programs and individual conversations with interested individuals or groups. That web page will be a one-stop-shop for all things related to the County of Lexington CDBG-DR programs and will be updated at pre-determined intervals as well as when immediate dissemination of information is necessary.

Technical Assistance

The County anticipates that the level of Technical Assistance (TA) will not be in high demand for this grant since the County will be administering the grant directly. However, the County has already contracted with a local HUD TA provider to provide technical assistance to County staff and this consultant will stay onboard to provide any further technical assistance necessary including DRGR training for staff.

The County of Lexington's staff will be provided with all training necessary to ensure that activities funded under this Action Plan are correctly administered. As mentioned before, the County has already hired an experienced CDBG-DR consultant to assist with the Action Plan process and Program Management.

HUD provided technical assistance to the County leaders and department heads - outlining the specific requirements of the Federal Register Notice along with guidance relative to best practices that should be considered by the County as it undertakes activities under the CDBG-DR program. Further, County staff members have attended HUD-provided training through the 2016 CDBG-DR webinar series and have access to these resources, as well as the HUD CDBG-DR program management tools provided on the HUDEXchange.info website.

The County plans to consult with HUD on an as-needed basis for general policy guidance or clarification of statutory requirements, though we do understand there are limited resources. Although the County anticipates that the disaster recovery grant will be managed out of the Washington, DC office, we will consult with the Columbia, SC HUD Field Office to seek solutions to issues.

Technical assistance will be provided to contractors and sub-recipients on a consistent basis to ensure they are up to date on the most current disaster recovery information and program requirements. This will be accomplished through training sessions, webinars, presentations or other communication tools.

Accountability

The County of Lexington (SC) shall serve as the lead agency responsible for the implementation of the CDBG-DR award. This implementation will be administered through the County Community Development Department. This department already administers the County's CDBG/HOME Annual Allocation. The Community Development Director will oversee the day-to-day activities of the department.

Under the Lexington County Council form of government, a nine member (single member districts) elected County Council governs the jurisdiction. That body annually elects from its membership a Chair and a Vice-Chair. The Council hires a County Administrator who reports to and answers directly to the elected council. The administrator is responsible for the day-to-day management of administration and operations of the government. The administrator is responsible for ensuring that the policies and procedures delineated by the council, as well as all local, state and national laws are followed. The Administrator also fills a hierarchical management structure by hiring Department Heads who in turn hire additional staff. The Department Head oversees the day-to-day operations of the department. The department head answers directly to the County Administrator and manage the individual departments. For just over four years the County of Lexington County Administrator has been Joe G. Mergo, III. Charles A. Garren has served as Community Development Director for just over two years.

Certification of Accuracy of Risk Analysis Documentation

On behalf of the County of Lexington Government, I _____, County Administrator that the information submitted within this Risk Analysis Documentation is true and accurate at the time of submission to HUD and complies with Federal Register Notice 5938-N-01 and Public Law 114-113. This certification is limited to the content of the Risk Analysis Documentation.

Printed Name and Title

Date

Signature

Appendices

Appendix A: Risk Analysis Checklist: Assessment of Internal Financial Standards

Appendix B: HUD Monitoring Guide for Financial Standards

Appendix C: Implementation Plan Checklist

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