

# CDBG-DR Implementation Plan

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**AUGUST 2023**

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**City of Fort Worth  
Neighborhood Services Department**



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## Version History

The version history of the policy guidelines is tracked in the table below, with notes for each change. The dates of each publication are also tracked in the table.

The City of Fort Worth will publish a new version after making substantive changes that reflect a policy change. When updated, the Implementation Plan will be assigned a new primary version number such as 2.0, 3.0, etc.

After making non-substantial changes, such as minor wording and editing or clarification of existing policy that do not affect the interpretation or applicability of the increase behind the primary version number such as 2.1, 2.2, etc.

| <b>Version Number</b> | <b>Date Revised</b> | <b>Key Revisions</b>        |
|-----------------------|---------------------|-----------------------------|
| 1.0                   | August 4, 2023      | Initial Implementation Plan |

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## **Definitions, Acronyms, and Abbreviations**

### **Federally Used Acronyms**

ARPA: American Rescue Plan Act

CARES: Coronavirus Aid, Relief, and Economic Security

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant-Disaster Recovery

CFR: Code of Federal Regulations

DRGR: Disaster Recovery Grant Reporting System

ESG: Emergency Solutions Grant

FEMA: Federal Emergency Management Agency

HOME: HOME Investment Partnerships Program

HOPWA: Housing Opportunities for Persons with AIDS

NCDA: National Community Development Association

NOFA: Notice of Funding Availability

RFP: Request for Proposal

TA: Technical Assistance

TCEQ: Texas Commission on Environmental Quality

### **Fort Worth-Specific Acronyms**

CAP: Community Action Partners

CDC: Community Development Council

CEAP: Comprehensive Energy Assistance Program

CFW: City of Fort Worth

FMS: Financial Management Services

FWERAP: Fort Worth Emergency Rental Assistance Program

FWHS: Fort Worth Housing Solutions

FWWD: Fort Worth Water Department

JEOC: Joint Emergency Operations Center

NSD: Neighborhood Services Department

OEM: Office of Emergency Management

PMD: Property Management Department

PSA: Public Service Agencies

TPW: Transportation & Public Works

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## 1. INTRODUCTION

The City of Fort Worth is the recipient of \$27,420,000.00 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds. The funding will be used to address long-term recovery efforts in response to the 2021 Winter Ice Storm. The Federal Register Notice allocating the CDBG-DR funds requires that the City prepare an Implementation Plan to demonstrate sufficient capacity to manage the funds and the associated risks. The Neighborhood Services Department – Planning Division provides this Implementation Plan in accordance with the CDBG-DR Federal Register Notice 87 FR 31636 issued March 22, 2022. This Implementation Plan will address the following items:

- Capacity Assessment – This section will identify the lead agency responsible for carrying out the CDBG-DR funds description of the capacity assessment, timeline and method of addressing capacity gaps, and open findings and corrective actions.
- Staffing – This section will describe the organizational chart, discuss financial management and compliance certifications, and list personnel or identify positions in essential functions to this grant.
- Technical Assistance – This section will address lack of personnel, filling knowledge gaps and technical expertise, and how CFW NSD will provide technical assistance to subgrantees and subrecipients.
- Internal and Interdepartmental Coordination – This section will discuss ensuring internal and interdepartmental coordination between City departments, subrecipients, local and regional planning activities, and relevant government agencies.

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## 2. ORGANIZATIONAL CAPACITY

### 2.1 Identify Lead Principal Agency

City of Fort Worth's Neighborhood Services Department (NSD) is Fort Worth's housing agency. NSD provides financial and program support to create and preserve quality, affordable housing and community development. The department primarily serves low and moderate-income Fort Worth families.

NSD receives funding for multiple programs from various sources including: local general funds; federal grant funds, Housing Finance Corporation; tax credits; state grant funds for Energy Assistance and Weatherization; and funding for emergency rental assistance. Some of the programs administered by NSD include the following:

- Priority Repair Program
- Homebuyer Assistance Program
- LeadSafe Program
- Community Action Partners
- Veterans Assistance

Additionally, NSD successfully operates federally funded programs and manages federal funds according to the terms and conditions of the grant and has been doing so for nearly 50 years. Some examples include:

- Community Development Block Grant
- HOME Investment Partnerships Program
- Emergency Rental Assistance from the United States Department of the Treasury
- CARES Act Funding
- HOME-ARP
- Comprehensive Energy Assistance Program
- Emergency Solutions Grant
- Housing Opportunities for Persons with AIDS

**Additional information regarding the various programs administered by NSD can be found on the website: <https://www.fortworthtexas.gov/neighborhoods>**

The organizational structure of NSD allows for cross functional communication across divisions. NSD is led by the Neighborhood Services Director and divided into the following divisions:

- Administrative Division
- Administration and Loan Services Division
- Community Services Division
- Compliance Division
- Housing and Community Development Division
- Neighborhood Improvement and Revitalization Division
- Planning Division
- Rehabilitation and Construction Management Division

The specific division designated to create and manage the CDBG-DR program is the Neighborhood Improvement and Revitalization Division. The manager of this division, Terrance Jones, reports directly to the Assistant Director, who reports directly to the Neighborhood Services Director.

## 2.2 Description of Capacity Assessment

NSD is the lead entity in the City of Fort Worth to address housing and community development needs, including being the recipient of United States Development of Housing and Urban Development (HUD) grant funding. In addition, NSD also received and managed rental assistance program funding from the U.S. Department of the Treasury to assist Fort Worth residents needing rental and utility assistance as a result of the coronavirus pandemic through the Fort Worth Emergency Rental Assistance Program (FWERAP).

In order to manage the influx of FWERAP funding received from the Treasury totaling more than \$50M, staff was hired to oversee intake/assessment, case management, and program management. This program is anticipated to conclude in December 2023. City of Fort Worth plans to repurpose staff previously hired to work on FWERAP to pivot and work on the CDBG-DR program. Staff will remain working in the same division and the same location. Infrastructure and processes have already been established and will easily transition to the new program. In addition to the current staffing, additional hiring will be undertaken in the Neighborhood Improvement & Revitalization Division (Housing Inspector – 2), Compliance Division (Contract Compliance Specialist), and Administration & Loan Services Division (Accountant).

NSD will reevaluate staffing needs annually to determine when additional hires are needed or any other changes are needed in order to effectively manage the program.

The table below demonstrates the capacity assessment completed in July 2023 and demonstrates the various roles and responsibilities, current staffing, additional planned staffing, and any other comments.

| Staff Position                         | Staff Status | Division                                  | Roles and Responsibilities  |
|--|--------------|---|---|
| Community Development Planning Manager | Current      | Planning                                  | Plan development; quarterly reporting; DRGR Administrator                       |
| Neighborhood Services Manager          | Current      | Neighborhood Improvement & Revitalization | Program management; policies & procedures; staff oversight; contract management |



|  |         |   |  |
|--|---------|---|--|
| Senior Administrative Services Manager | Current | Administration & Loan Services            | Financial reporting/ Budgeting; coordination with Internal Audit staff |
| Contract Services Administrator        | Current | Compliance                                | Maintaining compliance; overseeing program monitoring                  |
| Management Analyst                     | Current | Planning                                  | DRGR draw requests; reporting  |
| Environmental Review Planner           | Current | Planning                                  | Environmental Review process; HEROS updates                            |
| Senior Human Services Coordinator      | Current | Neighborhood Improvement & Revitalization | Intake Coordinator; oversee program administration staff               |
| Senior Human Services Specialist       | Current | Neighborhood Improvement & Revitalization | Intake/Assessment; client communications                               |
| Senior Human Services Specialist       | Current | Neighborhood Improvement & Revitalization | Intake/Assessment; client communications                               |
| Neighborhood Program Coordinator       | Current | Neighborhood Improvement & Revitalization | Program management; supervise program staff; contractor liaison        |
| Housing Rehabilitation Technician II   | New     | Neighborhood Improvement & Revitalization | Conduct housing inspections; work write-ups; submit ERs                |
| Housing Rehabilitation Technician II   | New     | Neighborhood Improvement & Revitalization | Conduct housing inspections; work write-ups; submit ERs                |
| Communications Specialist              | Current | Neighborhood Improvement & Revitalization | Coordinate marketing/outreach efforts                                  |
| Graphics Support                       | Current | Neighborhood Improvement & Revitalization | Website management; flyers, brochures, graphics; Social media updates  |
| Accountant                             | New     | Administration & Loan Services            | Invoice process; draw request preparation                              |
| Contract Compliance Specialist         | New     | Compliance                                | Program monitoring   |

### 2.3 Timeline & Method of Addressing Capacity Gaps

NSD staff assessed the current staffing in the department and identified the capacity gaps within the organizational structure. While NSD has the capacity to receive the CDBG-DR funding, additional staff is needed primarily for program management. The current staff working in the Rehabilitation & Construction Management operates and manages multiple programs, including housing rehabilitation, weatherization, and the Lead Safe program.

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Current staff is at capacity and unable to effectively manage additional programs or services. Rather than overtax one single division, it was determined that the CDBG-DR program should be managed by the Neighborhood Improvement & Revitalization Division which will be able to provide the focus needed for this select group of applicants. Also, with the pending closeout of the FWERAP, staff is available to transition from the rental assistance program to the disaster recovery program. This includes administrative and intake staff, but there is still a need for housing inspectors and program staff.

The following staff positions be requested to transition from FWERAP to CDBG-DR in late September 2023:

- Senior Human Services Coordinator
- Senior Human Services Specialist (2)
- Management Analyst

An additional four (4) staff are expected to be hired by October 2023:

- Accountant
- Contract Compliance Specialist
- Housing Rehabilitation Technician II (2)

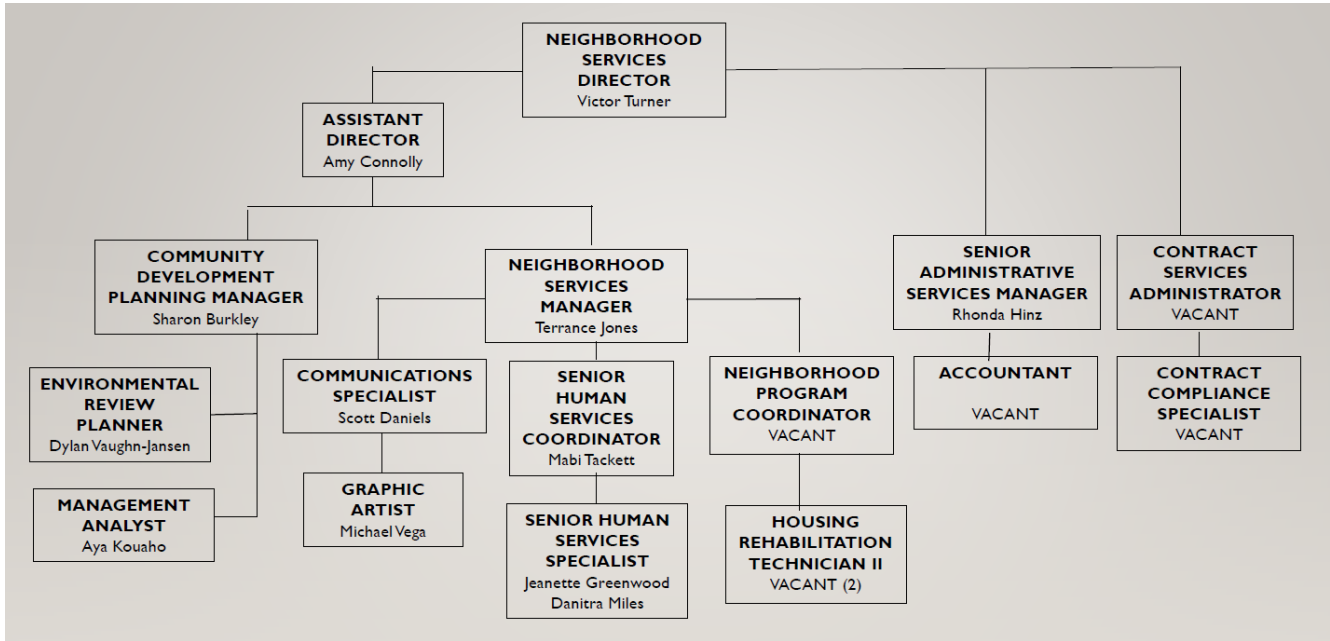
## **2.4 Open Findings and Corrective Actions**

The CDBG-DR funding will be the first time that NSD is managing CDBG-DR funds. As such, there are no open CDBG-DR findings. NSD along with the City of Fort Worth have been monitored in the past by federal partners for various funding sources including, but not limited to: CDBG, HOME, ESG, HOPWA, CSBG, CEAP, and LEAD. Various audits include the City of Fort Worth Single Audit. There are no outstanding audits at this time.

## **3. Staffing**

The following chart shows the current layout of personnel within the NSD assigned to work on CDBG-DR. The following sections will discuss the current staffing within the NSD.

### 3.1 Organizational Chart



### 3.2 Financial Management and Compliance Certification Personnel

Below is a list with contact information of key personnel supporting the Financial Management and Grant Compliance Certification Requirements.

| Tasks                   | Contact                         | Email Address  |
|-------------------------|---------------------------------|--|
| Financial Management    | Rhonda Hinz                     | <a href="mailto:Rhonda.Hinz@fortworthtexas.gov">Rhonda.Hinz@fortworthtexas.gov</a>       |
| Timely Expenditures     | Sharon Burkley                  | <a href="mailto:Sharon.Burkley@fortworthtexas.gov">Sharon.Burkley@fortworthtexas.gov</a> |
| DOB Analysis            | Terrance Jones                  | <a href="mailto:Terrance.Jones@fortworthtexas.gov">Terrance.Jones@fortworthtexas.gov</a> |
| Website Management      | Michael Vega                    | <a href="mailto:Michael.Vega@fortworthtexas.gov">Michael.Vega@fortworthtexas.gov</a>     |
| Compliance & Monitoring | Contract Services Administrator | TBD  |

### 3.3 Essential Grant Functions

Below is a chart describing the specific grant functions and the office/personnel responsible for completing the function.

| Grant Function    | Description of how NSD will address the grant function   |
|-------------------|--|
| Intake/Assessment | The Neighborhood Improvement & Revitalization Division will be responsible for Intake/Assessment. The Senior Human Services Coordinator will be the lead staff person overseeing this function.              |
| Program Manager   | The Neighborhood Services Manager will be responsible for administration of the CDBG-DR program. NSD will contract with developers and contractors for the housing rehabilitation and construction services. |

|                                  |   |
|----------------------------------|---|
| Contract Management              | The Neighborhood Program Coordinator will be responsible for managing all contracts and subrecipient agreements for the CDBG-DR program.  |
| Monitoring and Quality Assurance | NSD will have internal monitoring and quality assurance controls overseen by the Compliance Division and managed by the Contract Services Administrator.  |
| Financial Management             | The Administration & Loan Services Division will be responsible for maintaining CDBG-DR payment process, budget, and financial reporting.   |
| Planning                         | The Planning Division, managed by the Community Development Planning Manager, will be responsible for development, oversight, and updates of the City of Fort Worth CDBG-DR action plan, reporting, and grant tracking. |
| Internal Auditor                 | NSD will coordinate annual review of the CDBG-DR program with the City of Fort Worth Internal Audit Department (IAD). This will be proposed to be included as a part of the annual Audit Plan each year.                |

### 3.4 NSD DRR

Below are the bios for key staff in the division who will play a role in the administration of the CDBG-DR funding and provide support when needed. Note that key staff includes the Department Director and the managers of the different divisions and does not include the various positions with those divisions.

#### **Neighborhood Services Director**

*Victor Turner*

As the Department Director of NSD, Victor oversees the strategic direction, vision, and growth of NSD. Victor has extensive leadership administering housing and community development programs working with both local and state governments. Victor reports directly to the Assistant City Manager.

#### **Assistant Neighborhood Services Director**

*Amy Connolly*

As the Assistant Director of NSD, Amy provides support to the division managers overseeing the CDBG-DR program. In this role, she provides leadership and management to NSD team members focused on planning, organizing, preparing, and managing the program. Amy reports directly to the Neighborhood Services Director.

#### **Contract Services Administrator**

*VACANT*

The Contract Services Administrator will lead efforts on all compliance initiatives. This position will direct the development of the compliance and monitoring policies and procedures and review key grant documents, including grant agreements, RFPs, and all other forms of

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competitive procurements, review Notices of Funding Availability (NOFAs), and provide internal technical assistance and guidance on all other key documents. The staff led by this position will perform the important functions of ensuring grant management and compliance, monitoring of subrecipients and partner agencies, internal quality control and quality assurance of all program activities, and internal contracting or granting document review and approval. The Contract Services Administrator will also provide expert advice to other Senior Staff and leadership positions on federal, state, and local regulations and will serve as the designated compliance officer for HUD Monitoring, Audits, or HUD Office of Inspector General Monitoring or Audits.

### **Senior Administrative Services Manager**

#### ***Rhonda Hinz***

The Senior Administrative Services Manager will oversee all financial aspects of the CDBG-DR program, including processing payroll, invoices, and preparing draw requests. This position will also be responsible for budget development and monthly financial tracking. Rhonda has over 10 years of experience working with grant accounting, administering programs, and financial management.

### **Neighborhood Services Manager**

#### ***Terrance Jones***

The Neighborhood Services Manager will be responsible for overseeing program implementation and management of the CDBG-DR program. This includes managing the Call Center, program delivery, contract management, marketing/outreach, and overall leadership. Terrance has nearly ten years of experience working in municipal government and most recently successfully managed the Fort Worth Emergency Rental Assistance Program, which provided rental and utility assistance to Fort Worth residents in response to the coronavirus pandemic.

### **Community Development Planning Manager**

#### ***Sharon Burkley***

The Community Development Planning Manager will oversee the action plan development, including any amendments or updates, implementation plan, and assist with policies and procedures. This position will oversee staff responsible for processing draw requests in DRGR, submitting reports, and providing program updates to both internal staff, City leaders, and HUD. Sharon has extensive leadership in working with grants in several aspects, including accounting, auditing, compliance monitoring, and planning.

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## 4. Technical Assistance

### 4.1 Address Lack of Personnel

NSD has identified some gaps in the capacity assessment. There are four (4) new positions to be hired as described in the previous section.

In addition to staffing, NSD is planning to expand its current contract with Neighborly Software to receive and process applications for the CDBG-DR program. This system will allow for the efficient and effective management of the program, including client applications, RFP submissions, payment processing, and reporting. The contract amendment is expected to be completed by September 2023.

### 4.2 Filling Knowledge Gaps & Technical Expertise

NSD currently has multiple years of federal grant experience among the staff, with several with CDBG experience including both management and staff. However, staff does not have experience administering the CDBG-DR grant program. To address knowledge gaps, NSD will orient new and current employees by relying on existing staff, in-person and online CDBG-DR training provided by HUD, NCEM in-person and online trainings, and the HUD-appointed Technical Assistance (TA) provider to provide training.

- Existing Staff: NSD has several staff members with extensive knowledge and experience in CDBG and federal grant experience. Employees are expected to cross-train internally and coordinate across functions to ensure information sharing among teams.
- HUD Training: NSD staff are encouraged to use HUD-developed trainings on the HUD Exchange to understand the CDBG fundamentals as well as attend various HUD trainings offered both in-person and on HUD's website.
- NCEM Training: NSD staff are encouraged to register for NCEM conferences and attend CDBG trainings as well as use NCEM trainings offered online.
- TA Provider: Currently, the HUD-appointed TA provider (Capital Access) is developing training modules for new and current staff that will be delivered in 2-hour sessions which will provide overviews of the pertinent information required to effectively administer the CDBG-DR grant. Topics included for these trainings are:
  - Overview of the DR programs in relation to the FRN
  - Review of cross-cutting regulations
  - Environmental Reviews
  - Uniform Relocation Act (URA)
  - Duplication of Benefits (DOB)

### 4.3 Technical Assistance to Subgrantees and Subrecipients

To ensure that successful program implementation is sustained over the life of the grant, NSD staff will share resources and contents received from various trainings regarding programs and

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projects funded by the CDBG-DR grant with subgrantees and subrecipients. Additionally, NSD will continue to offer various opportunities for training and TA for its partners and subgrantees.

When issues arise with compliance, training and technical assistance resources will be procured to assist the subgrantee to ensure compliance. If it is determined that there are any disallowed costs, these costs will be repaid and returned to the federal agency as appropriate. If there are more severe challenges, these will be elevated to the Neighborhood Services Director and Leadership Team who will determine a plan of action with deadlines the subgrantee must follow to remedy any issues.

## **5. CDBG Programs and Applications Procedures**

### **5.1 Frequency of Communications with Applicants**

The Neighborhood Improvement & Revitalization Division will be responsible for communicating with applicants and addressing any questions or concerns they may have regarding the procedures for applying to the CDBG-DR programs, conducting procurements, submitting payments for reimbursement, tracking potential program income, maintaining program compliance, and closing out activities. The division will communicate with applicants as frequently as needed and elevate issues internally to resolve difficult cases.

### **5.2 Citizen Complaints**

If NSD or its subrecipients receive formal complaints, NSD or its subrecipients shall provide a written response within 15 business days of receipt of the complaint or document why additional time for a response is needed. A formal complaint is defined as a written statement of grievance and includes but is not limited to email, comments posted on the NSD website, and handwritten complaints. All complaints will be collected and categorized for tracking through resolution by NSD.

NSD or its subrecipients should also attempt to resolve any informal complaints. Informal complaints are defined as verbal complaints and are not subject to the written response process described above.

Any complaints alleging the violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of government should be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).

### **5.3 Protocols for Protecting Personally Identifiable Information**

NSD requires staff to use the necessary controls to ensure the protection of personally identifiable information retained by the agency while completing City business.



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## 6. Internal and Interagency Coordination

### 6.1 Ensuring Effective Communication between City Departments

NSD coordinates with other departments within the City of Fort Worth to successfully administer grant funding. Coordination with each department is described below:

- Financial Management Services
  - NSD staff will schedule a meeting with FMS to prepare for the new grant setup, budget, and discuss fiscal processes, reporting, accounting, and other relevant information for implementation
- Human Services
  - NSD staff will work with the Human Services Department to submit requests for overage positions being transitioned from the Fort Worth Emergency Rental Assistance Program to the CDBG-DR program
  - Positions to be hired will be reviewed and coordinated with the Talent Manager to post the positions, assist with recruitment, and onboarding after candidate selection.
- Legal
  - NSD staff will schedule a meeting with the department attorney to develop subrecipient agreements, review contracts, and assist with contract execution.

NSD will also coordinate with other various City departments in the administering of the CDBG-DR funding. Coordination with City departments include, but are not limited to the following:

- Office of Emergency Management (OEM) – OEM is responsible for the coordination of response and recovery from emergencies or disasters. NSD coordinates with OEM around the disaster, as well as on short and intermediate housing recovery.
- Fort Worth Water Department (FWWD) – FWWD provides water and sewer services to Fort Worth residents and surrounding cities within Tarrant County. In addition, FWWD sustained damage to four of its water treatment plants with only two being replaced to date. NSD coordinates with FWWD to provide information and conduct outreach to residents and will utilize this process to update residents on available programs and services offered through the CDBG-DR program
- Property Management Department (PMD) – PMD oversees and manages all City-owned facilities and buildings. NSD will schedule meetings with PMD to determine any possible sustained damage that may be assisted through CDBG-DR funding.

### 6.2 Ensuring Effective Communication between Subrecipients

NSD regularly contracts with nonprofit and for-profit developers, social service agencies, and community housing development organizations for affordable housing and community development projects. NSD often conducts informational sessions (Pre-Proposal Conferences) prior to releasing solicitations, as well as schedules regular check-ins and/or site

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visits to gather insight on project status and progress. For CDBG-DR programs, NSD will continue to follow the already established policies to ensure positive relationships with subrecipients.

Additionally, to ensure consistency across CDBG programs, NSD will adapt the template subrecipient agreements for CDBG-DR contracts utilized for current CDBG programs.

NSD is committed to providing technical assistance to all partners to ensure the success of every program.

### **6.3 Ensuring Effective Communication between Local and Regional Planning Efforts**

Local and regional planning efforts are a key factor in the implementation of activities funded by the CDBG-DR grant. The City of Fort Worth is part of a coordinated effort in the development of the Tarrant County Hazard Mitigation Plan which is a collaboration between Fort Worth, Arlington, and the surrounding municipalities.

### **6.4 Consultation with Relevant City Departments**

City of Fort Worth Office of Emergency Management, which serves as the primary liaison for addressing disasters and emergencies, was consulted and involved in multiple conversations during the development of the Action Plan, as were other City departments.

## **7. Implementation Plan - Conclusion**

### **7.1 Meeting Requirements in 87 FR 31636**

NSD certifies to the accuracy and validity of the evaluation of risk and management capacity, as attested to by executing the P.L. 117-43 Financial Management and Grant Compliance Certification for all 2020 Grantees Receiving CDBG-DR Funds (February 2022), submitted with this Certification Documentation and Implementation Plan.