

St. Tammany Parish Government - Department of Grants

DISASTER RECOVERY PUBLIC WEBSITE MAINTENANCE PROCEDURES

I. Introduction & Purpose

As established in the regulations associated with the appropriation of funding provided to St. Tammany Parish Government to assist in the parish's recovery from Hurricane Isaac, grantees are required to "maintain a public Web site which provides information accounting for how all grant funds are used, and managed/administered, including details of all contracts and ongoing procurement policies."¹

Understanding the public nature and high level of scrutiny associated with administering federal recovery dollars, St. Tammany is committed to being completely transparent with respect to all aspects of its recovery projects. The parish's Isaac CDBG-DR webpage provides a space for sharing with the public current information on where recovery investments are being made, the progress of individual projects, and the policies and procedures by which the parish will manage the available funding. The parish strives to provide a wide audience of stakeholders and other interested observers a real time account of the recovery efforts being undertaken in their communities and a clear understanding of the how the parish administers the efforts.

Similar to the parish's approach to transparency, St. Tammany recognizes the value of input both from citizens of the parish and other individuals and groups interested in the parish's recovery. To that end, the parish's webpage provides information on how individuals can provide feedback or ask questions related to the overall recovery plan, specific initiatives, and administrative policies and procedures. Maintaining an open dialogue with those impacted by the disaster and the subsequent recovery efforts is of primary importance to St. Tammany.

II. Action Plan

The Parish will make available via its CDBG-DR website its initial Action Plan, all amendments to the initial Action Plan, and a master version of the Action Plan, which will be inclusive of all amendments. In addition, the Parish will provide for the ability for the public to submit comments relative to the items covered in the initial Action Plan and subsequent amendments.

a. Initial Action Plan

The initial Action Plan will be posted to the parish's website and made available for the public's review in accordance with federal regulations. Once the public comment period has expired, the Action Plan will be submitted to HUD for review and approval. Upon receiving approval from HUD, the date of approval will be clearly indicated on the parish's website.

b. Amendments

Substantial amendments to the initial Action Plan (i.e. those that result in a change in program benefit or eligibility criteria, the allocation or re-allocation of more than \$1 million, or the addition or deletion of

¹ "Allocations, Common Application, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Hurricane Sandy." *Federal Register* Vol. 78, No. 43, 14344.

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an activity) will be posted to the parish's website and made available for the public's review in accordance with federal regulations. Once the public comment period has expired, the amendment will be submitted to HUD for review and approval. Upon receiving approval from HUD, the date of approval will be clearly indicated on the parish's website. All substantial amendments will be translated into the languages identified by the Parish's four point language analysis.

St. Tammany will notify HUD of non-substantial amendments to the initial Action Plan but will not post them to the parish's website for public comment. Once HUD has acknowledged receipt of a non-substantial amendment or after five days have elapsed since the submission to HUD, the parish will post the non-substantial amendment to its website.

All amendments (substantial and non-substantial) will be numbered sequentially and incorporated into the parish's Master Action Plan.

c. Master Action Plan

The parish will maintain a Master Action Plan that will serve as a single point of reference with regards to its plans for utilizing the CDBG-DR appropriation. The Master Action Plan will incorporate all amendments and will be made available to the public via the parish's website.

d. Public Comments

In accordance with federal regulations and in the interest of ensuring that the public is afforded ample opportunities to provide feedback to St. Tammany on its plans for the recovery effort, the parish will make available multiple methods by which public comments can be submitted:

- Online form available through the website.
- Email address for a parish staff member.
- Fax number for the parish Grants Office.
- Mailing address for the parish Grants Office.

The website will clearly identify the individual serving as the primary point of contact for all public comment related communications.

e. Link to Public Notices

Links to HUD's webpage containing all of the applicable Public Laws, Federal Register Notices, and other related materials will be included in the Action Plan section of STPG CDBG-DR website.

III. Reporting

Furthering STPG's commitment to transparency, the parish will post a number of reports to its CDBG-DR website that will provide the citizens of St. Tammany and other interested observers a detailed look at the status and locations of projects, the pace of expenditures, and the overall budget related to the recovery effort.

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a. Budget Reports

A report detailing how STPG has allocated its appropriation to various projects, the amounts currently obligated to each project, and the amounts currently expended for each project. The budget report will be updated on a monthly basis and posted to STPG's website. Reports from prior months will continue to be made available on the website in order to provide the public with a historical perspective on the pace of spending.

b. Project Progress Reports

STPG will post a report to its website that provides a status update for each of the projects being undertaken. The report will highlight various milestones that have been reached and set expectations for the projects moving forward. The progress report will be updated on a monthly basis and posted to STPG's website. Reports from prior months will continue to be made available on the website in order to provide the public with a historical perspective on the progress of each project.

c. GIS Mapping of Recovery Investments

STPG's website will include a map of the parish delineating the locations of the projects in order to provide the public with a visual reference of the recovery efforts being undertaken in their communities.

d. Quarterly Performance Reports

As required by HUD, STPG will complete a Quarterly Performance Report (QPR) detailing the expenditures, accomplishments, and beneficiaries associated with the appropriation of funding over each quarter. All quarterly reports are due to HUD on the 30th of each month after a quarter ends. STPG will post the each QPR when it is submitted to HUD. Initially, the report will be labeled as "Pending HUD Approval" until the parish receives notification from HUD that the QPR has been reviewed and accepted.

IV. Grants Management

STPG will post the policies and procedures that govern its management of the CDBG-DR funding in order to ensure that all individuals are afforded an opportunity to gain an understanding of how the parish manages the recovery dollars.

a. Administrative Manual

STPG's CDBG-DR Administrative Manual sets forth the policies and procedures by which the parish manages its recovery funding – with respect to ensuring compliance with applicable local, state, and federal rules and regulations. The manual will be updated on an as needed basis and STPG will ensure that the latest version of the manual is available on its website.

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The Administrative Manual covers the following topics:

- CDBG-DR National Objectives
- Duplication of Benefits
- Handling Complaints
- Action Plan Amendments
- Reporting
- Citizen Participation
- Sub-recipient Management
- Construction Contract Administration
- Grant Implementation
- Records Management
- Financial Management
- Public Website Management

b. Internal Controls

In addition to the topics covered in the parish's Administrative Manual, STPG will post to its website additional documents that address the various internal controls put in place to ensure the appropriate use and management of the CDBG-DR funds:

- Monitoring policies and procedures
- Procurement policies and procedures
- AFWA policy
- Internal audit policies and procedures (including diagram of functions)

STPG's executive staff meets on a weekly basis to review and discuss procurement and financial management policies and procedures. Staff of the Department of Grants coordinates reviews with staff from relevant departments on a quarterly basis to ensure that STPG's CDBG-DR Administrative Manual and the documents that address the parish's internal controls accurately describe STPG's administrative and program operations at any given point in time. At a minimum, STPG will make changes to the policies and procedures on an annual basis; however, changes determined to be of critical importance or that address or cause a substantive change to the parish's operations will be made within 30 days of the change being approved.

c. Contracts

STPG will post to its website copies of all executed contracts valued over \$25,000. In addition, any substantial amendments to those contracts (e.g. contract value is increased or scope of services is revised) will be posted to the parish's website. All postings will occur within 7 days of the contract (or amendment) being fully executed.

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Further, STPG will make available information (via a link to the parish's Purchasing Department webpage) on the status of services or goods currently being procured. Information on the phase of the procurement, requirements for proposals, winning bidder, etc. will be included.

d. Points of Contact

An organizational chart depicting STPG leadership and the personnel responsible for managing the CDBG-DR funding will be posted to parish's website. Contact information for key personnel will be included as well. If a material staffing change occurs, STPG will update the applicable item(s) within 30 days of the official change.

V. Accessibility of Information

STPG strives to implement an all-inclusive recovery strategy that recognizes the diversity of the residents of the parish. To that end, the parish will translate all vital program documents into Spanish (as determined by the completion of a Limited English Proficiency four factor analysis) and make available individuals (both staff members and through a designated social service agency) that are able to communicate effectively with non-English speakers.

In addition, the parish's CDBG-DR website will utilize features allowing for automatic translation into the language of the reader's choice via Google translation services and for the adjustment of font size in order to accommodate the visually impaired.

VI. Website Maintenance Procedures

The Director of Public Information directs and supervises the content of the website. Staff within the Department of Grants develops the narrative and visual content. The Department of Grants is responsible for updating the website, usually on a monthly basis, with information they receive from developed within the department and from other areas of the parish government. Department of Grants staff members report significant policy changes directly to the CDBG-DR Project Manager. This information is developed into web content and the CDBG-DR Project Manager adds the content to the website. The STPG Department of Grants reviews the website and provides edits, updates, and changes directly to the CDBG-DR Project Manager.