



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

FEB 10 2014

Mr. Brent Christensen
Executive Director
Mississippi Development Authority
P.O. Box 849
Jackson, MS 39205-0849

Dear Mr. Christensen:

Thank you for the time you and your staff spent with the Department's representatives during the August 19-23, 2013, management review of the State of Mississippi's disaster recovery supplemental appropriations under the Community Development Block Grant (CDBG) program. Based on this review, the Department is hereby submitting the enclosed report to the State's designated program administrator, the Mississippi Development Authority (MDA). The objective of the review was to determine if MDA is implementing its actions for the disaster recovery grant in accordance with all applicable regulations, Office of Management and Budget circulars, as well as the pertinent notices and waivers specific to Mississippi.

The monitoring review resulted in two findings. If you have additional information that is relevant to the monitoring conclusions or comments on the substance of the enclosed report, please submit them to the Department in writing within 30 days of the date of this letter. The Department is appreciative of the difficult work you and your office are engaged in.

Sincerely,

A handwritten signature in black ink, appearing to read "Stanley Gimont".

Stanley Gimont
Director
Office of Block Grant Assistance

Enclosure

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
MANAGEMENT REVIEW REPORT**

Mississippi Development Authority



**Community Development Block Grant
Supplemental Disaster Recovery Funds
State of Mississippi**

Grant Numbers

**B-06-DG-28-0001
B-06-DG-28-0002
B-08-DI-28-0001
B-08-DF-28-0001**

INTRODUCTION

HUD conducts management reviews, in conjunction with monitoring visits, to ensure that its programs are carried out efficiently, effectively, and in compliance with applicable laws, regulations, and established policies. Just as importantly, these reviews are intended to assist grantees in improving their performance, developing or increasing capacity, and augmenting their management and technical skills. Monitoring is not limited to a one-time evaluation, but rather is an ongoing process that assesses the quality of a grantee's performance over a period of time. Successful monitoring visits require effective communication and cooperation between Federal, State, and local partners.

From August 19-23, 2013, HUD conducted an onsite monitoring review of the Mississippi Development Authority's (MDA) management of the disaster recovery supplemental appropriations under the Community Development Block Grant (CDBG) program. The review was conducted at MDA's satellite office in Biloxi and at MDA's office in Jackson. This report presents the results of the monitoring review and notes areas in which technical assistance was provided.

Mississippi received four CDBG disaster recovery allocations under four public laws. MDA is the agency responsible for administering the disaster recovery funds (under grant numbers (B-06-DG-28-0001, B-06-DG-28-0002, B-08-DI-28-0001, and B-08-DF-28-0001) authorized under Public Laws (P.L.) 109-148, enacted December 30, 2005; P.L. 109-234, enacted June 15, 2006; P.L. 110-252, enacted June 30, 2008; and P.L. 110-329, enacted September 30, 2008.

SCOPE OF REVIEW

The following areas of grant management were reviewed with regard to the identified programs or sub-grantees:

Programs

- Economic Development
- Port of Gulfport
- Disaster Recovery Enhancement Fund (DREF)
- Neighborhood Home

Grant Management

- Recipient and subrecipient management
- Financial management
- Internal audit functions
- Procurement
- Eligibility and national objective compliance
- Overall management
- Lead-based Paint compliance

Overall agency management of the entire disaster recovery CDBG program was also reviewed. In addition to compliance, program performance was reviewed with regard to tracking expenditures and outcomes.

The HUD monitoring team included the following Disaster Recovery and Special Issues (DRSI) Division staff: Tennille Parker, Acting Director; Donna Roachford, Team Leader and Community Planning and Development (CPD) Specialist for the State of Mississippi; Earl Randall, Senior CPD Specialist; Debbie Key, CPD Specialist; Grace Saenz, CPD Specialist, Neba Funiba, CPD Specialist; and Denise White, Financial Management Analyst.

SUMMARY OF RESULTS AND CONCLUSIONS

Monitoring reviews may result in the identification of findings or concerns. A finding is a deficiency in program performance based on a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized. A concern is a deficiency in program performance not based on a statutory, regulatory, or other program requirement. HUD issues a concern about program design or operations when in HUD's judgment the practice could, if not corrected, result in noncompliance with a statutory, regulatory, or program requirement. This monitoring review resulted in one finding, and one concerns.

COMPLIANCE

Finding 1

MDA did not have sufficient records available to facilitate HUD's review of compliance with CDBG national objective of retention of jobs for low-and moderate-income persons for the Port of Gulfport project.

Finding 2

Subrecipients with open contracts are not being tracked in accordance with the Office of Management and Budget (OMB) A-133 audit reporting requirements.

Economic Development

The Katrina CDBG Economic Development Program was established under the Hurricane Katrina Supplemental Award (\$340,000,000) and is administered by the Mississippi Development Authority (MDA). The program provides grants and loans to local governments that were affected by Hurricane Katrina. The grants and loans are in turn used to fund infrastructure to support economic development with the intent to create and/or retain jobs.

The State has developed guidelines that it uses to award the funds. Program funds are made available to grant recipients through a competitive application process. First, the grant applicant submits a detailed narrative and budget for the proposed project. Based on need and project feasibility, MDA may meet with relevant parties to discuss their projects. Second, MDA issues a letter inviting applications for funding and stating the amount available to each applicant. Finally, MDA receives and rates applications using a scoring system. Selection criteria are used to objectively rate the applications and the decision whether to award funds is based on the score attained. MDA establishes the minimum score required for application acceptance.

This review focused on the following areas of compliance: eligibility and national objective, low- and moderate-income (LMI) benefit, qualification, citizen participation, underwriting guidelines, State administrative controls and procedures, program income, Davis Bacon, Section 110 of the HCDA of 1974 (as amended), Environmental Review, Section 104(f) of the HCDA of 1974 (as amended), National Environmental Policy Act of 1969 (NEPA), and Reporting requirements.

The process consisted of reviewing randomly selected projects that were that were located in Hancock, Harrison and Jackson Counties. All files were well documented and demonstrated compliance. Table 1, below identifies the projects included in HUD's review.

Table 1: Economic Development Projects Reviewed

Activity	CDBG-DR Budget
Hancock County	
MAC LLC/Belevance: building renovation	\$1,981,043
Selex Defense Contractor- construction of hanger facilities and a fire protection/suppression system	\$6,350,000
Lazy Magnolia Brewery- building facility expansion, access road and drainage	\$1,676,224
Harrison County	
D'Iberville Shopping Mall-Promenade- access road, water/sewer, and drainage	\$4,986,424
Jackson County	
Highway 611: Expansion of MS Highway 611 and utility relocation	\$35,000,000
VT Halter Phase II Dry Dock Expansion Project: bulkhead, vessel repair facility, soil stabilization and dredging	\$20,000,000
Signet Maritime: fabrication hall, environmental concrete cover, and bulkhead, construction	\$3,600,000
Total	\$73,593,691

Based on the review, the State has appropriate administrative controls and procedures outlined in its Procurement Manual, Memorandums of Agreement, and Subrecipient Agreements that enable MDA to oversee the program. MDA has a bureau dedicated to the monitoring of disaster recovery programs funded with CDBG funds. These agreements require regular progress reports, permit MDA access to grant records and sites, and require that all procurement actions be in accordance with State and Federal requirements. The State requires its grantees to report quarterly on the progress being made (including jobs created) for a period of three years after project is completed. There were no findings or concerns in this area. Further, HUD staff provided technical assistance to MDA staff regarding program income and the new State CDBG Administrative Rule published in May 2012.

Lead-based Paint Compliance

Horne and URS staff was responsible for the application process for the State's Neighborhood Home Program (NHP) from intake through construction completion and final payment. MDA has developed a detailed checklist for all of the key lead-based paint compliance areas. MDA monitors the contractors (Horne and URS) for compliance with federal CDBG guidelines. The checklist includes an environmental and historical checklist along with a monitoring checklist similar to the examples used by HUD to conduct monitoring reviews. A confirmation of the homeowner's receipt of the required lead hazard information pamphlet is noted in each file (reference 24 CFR 35.910(b) and 24 CFR 35.130).

HUD reviewed a random sample of 20 NHP program files for review of lead-based paint compliance. The files were well-organized and contained all the necessary compliance documents including documentation of rehabilitation costs. All of the files included in the review were found to be detailed and met the lead-based paint requirements. Per State requirements (more strict than HUD policy) MDA's contractors conducted a Visual Assessment on each property. Each file complied with paint testing on surfaces to be disturbed, a notice to occupant of evaluation for paint testing using lead safe work practices during rehabilitation and lead hazard reduction, clearance, risk assessment, and interim controls.

**Table 2: Summary of Housing Rehabilitation Activities
Lead-based paint compliance**

CDBG-DR Rehabilitation Cost Categories	Number of NHP Rehabilitation Activities	Total CDBG-DR (funds expended for each project)
<\$5000	4	\$12,205
\$5000-\$25,000	13	\$155,920
>\$25,000	4	\$242,000
Total	21	\$410,125

HUD staff provided technical assistance to MDA staff regarding recordkeeping in accordance with 24 CFR 35.175 (b). HUD advised the State to ensure that the record retention policy requirements were consistently referenced in the State's policy and procedures. HUD staff also provided technical assistance to MDA staff regarding calculating the level of rehabilitation assistance. MDA used the total cost for rehabilitation which included hard costs plus the soft costs to calculate the level of assistance. The regulations at 24 CFR 35.915 require that only hard costs (with some exceptions) for rehabilitation are used to identify the level of assistance. Since soft costs and lead-based paint reduction costs are not included in the hard cost, staff suggested that MDA itemize costs so hard and soft costs are easily identified in the active files. MDA agreed to have the contractors chart these cost for easy identification.

Overall, the files reviewed appeared to be compliant with the lead-based paint requirements and MDA has a full understanding of the program. There were no findings or concerns.

Port of Gulfport Restoration Project (PGRP)

The Mississippi State Port Authority's (MSPA) Port of Gulfport is a State-owned deepwater seaport and one of the most easily accessible American ports on the U.S. Gulf Coast. The MSPA is an Enterprise Agency of the State of Mississippi and is responsible for the daily operations of the Port of Gulfport. The Port is the second largest importer of green fruit in the United States and the third busiest container port on the Gulf Coast. The ship channel and harbor basin are maintained by the U.S. Army Corps of Engineers, in cooperation with the MSPA, with an authorized minimum project depth of 36 feet. The Port facilities include two piers, East and West, mooring pile clusters and extensive open storage areas, with crane service, rail service and container and trailer marshaling areas.

The Port of Gulfport Restoration Program (PGRP) action plan established in late 2007 outlined the MSPA's goal of rebuilding and protecting the Port to both retain and create a substantial number of jobs as a result of the use of CDBG-DR funds. The State's Action Plan indicated that this project will meet the low- and moderate-income job creation/retention national objective by retaining 1,286 jobs and creating an additional 1,300 jobs for a total of 2,586 jobs, the majority of which would be for the benefit of low- and moderate-income persons.

The Department acknowledges that the PGRP is an ongoing effort that is projected to continue for several more years but one aspect of MDA's management of the project presents substantial concerns. In the six years since the State issued the action plan amendment initiating the PGRP, MDA has failed to implement an effective process for tracking retained jobs at the Port. While the Action Plan proposed retaining 1,286 direct jobs as a result of the investment of CDBG-DR funds in the PGRP, the State's Quarterly Performance Reports (QPR) submitted since January 1, 2013, indicate that a varying number of jobs have been retained. The QPR submitted in January 2013 indicated that 1,111 jobs had been retained; the QPR submitted in April 2013 reduced that number to 1,099; and the QPR submitted in October 2013 further reduced the number to 814.

During the monitoring review conducted in February 2013, HUD issued a monitoring concern that MDA did not have sufficient records available to facilitate HUD's review of compliance with the CDBG national objective of creation or retention of jobs for low- and moderate-income persons for the Port of Gulfport Restoration Project (Concern 2). The CDBG national objective requires that at least 51% of the jobs created/retained are held by or made available to low- and moderate-income persons. The related monitoring letter stated that HUD would examine available job retention documentation during the next monitoring review.

During the August 2013 monitoring review, HUD staff examined supporting documentation to address the concern. Specifically, HUD reviewed available records in an attempt to verify the number of jobs retained at the Port. As of August 2013, MDA claimed 141 retained jobs were held by low- and moderate-income persons but HUD could only verify 128 retained jobs as being held by LMI persons. As a result of HUD's review in August, the concern stated in February is elevated to a finding.

Finding 1

With regard to the job retention component of the PGRP, MDA has not maintained records adequate to assist in demonstrating ultimate compliance with the CDBG low- and moderate-income national objective for the PGRP.

Condition:

In HUD's review of PGRP project files, MDA could only provide supporting documentation to demonstrate that 128 retained jobs were held by low- and moderate-income persons. This represents approximately 10 percent of the 1,286 jobs projected to be retained by the Action plan or approximately 16 percent of the 814 retained jobs claimed by MDA in the QPR provided to HUD in October 2013. By either measure, the job retention component of the PGRP has fallen short of the projected performance level that will assist the PGRP to ultimately meet the CDBG national objective of providing benefit to low- and moderate-income persons through the creation and retention of jobs.

Criteria:

Section 24 CFR 570.490 of the CDBG regulations states "State records must contain documentation which demonstrates that each activity meets one of the national objectives." Further, the *Federal Register* Notice issued March 6, 2007, (72 FR 10021) provided certain waivers and alternative requirements for the State of Mississippi with respect to Hurricane Katrina CDBG-DR funding specified that "the grantee shall report and maintain documentation on the creation and retention of (a) total jobs, (b) number of jobs within certain salary ranges, (c) average amount of assistance provided per job by activity or program, and (d) types of jobs." While national objective compliance for PGRP ultimately will be based on the total of all jobs created and retained by the activity, MDA has failed to produce or maintain adequate documentation on the job retention component that will contribute to demonstrating overall national objective compliance for the PGRP.

Cause:

MDA did not provide HUD with the required documentation to verify that at least 51% of the retained jobs were held by or made available to low- and moderate-income persons. In addition, the State did not comply with the job data collection requirements of the March 7, 2006, *Federal Register* Notice.

Effect:

The failure to provide adequate job retention documentation is in violation of 24 CFR 570.490 as well as the requirements of the March 7, 2006, Notice. Further, the shortcoming in documenting retained jobs is a risk factor that may ultimately hinder the PGRP in demonstrating compliance with the CDBG-DR national objective of low- and moderate-income benefit through the creation and/or retention of jobs. If the PGRP fails to meet a CDBG-DR national objective, HUD may ultimately apply available sanctions against the State.

Recommended Corrective Action:

Six years after development of the PRGP action plan amendment and eight and a half years after Hurricane Katrina, the Department views the job retention component of the PGRP as effectively completed. However, MDA's long-term interests are best served by addressing gaps in existing job retention records associated with the CDBG-DR investment in the PGRP. At a minimum, MDA must document to the greatest extent possible the 814 jobs reported as retained in the recent QPR to meet the requirements of 24 CFR 570.490 and the March 6, 2007, Notice. MDA is also urged to make efforts to qualify, over and above the 128 jobs already verified by HUD, additional retained jobs as benefitting low- and moderate-income persons.

To ensure that the majority of jobs to be created are taken by or made available to low- and moderate-income persons, HUD's focus will turn toward future actions of the MDA and MSPA. While it is problematic that the MDA and MSPA did not maintain better records with regard to retained jobs, the CDBG national objective of providing benefit to low- and moderate-income persons through the creation and retention of jobs can still be achieved by the PGRP. The Department understands that MSPA is in active negotiations with current and future Port tenants but there must be improvement in the ability of MDA and MSPA to document jobs resulting from these investments. To ensure that MSPA and MDA establish a process that complies with applicable statutory and regulatory requirements, HUD is imposing the following corrective actions to prevent future documentation deficiencies for job creation activities:

- 1) Within 60 days of the date of this letter, MDA shall submit to HUD the policies, processes and procedures that it intends to use to document jobs to be created at the PGRP. The Department will review these materials for adequacy and inform the MDA of any revisions that are deemed necessary to meet applicable requirements.
- 2) The State must meet with senior HUD staff each quarter, beginning in February 2014 to discuss progress with the PGRP job creation activities, new tenant leases that will lead to those job opportunities, and efforts to recruit and train employees for those jobs.
- 3) The State must submit the required jobs documentation to HUD for each job created or retained with the submission of each QPR, beginning with the QPR due in April 2014.
- 4) As they are executed, the State must submit to HUD the agreements it has entered into with each business tenant at the Port of Gulfport, indicating the specific jobs to be created/retained and the projected timeframes for implementation. Each agreement should also identify the corrective actions the State will impose if the businesses do not comply with the job creation requirements and the timeframe for job creation activities to be complete.

HUD acknowledges the detailed work that Philip Carter and Christiana Hassin completed preparing and making available the documentation provided to HUD for review.

Disaster Recovery Enhancement Fund (DREF)

HUD reviewed CDBG Disaster Recovery Enhancement Fund (DREF) activities for compliance with CDBG national objectives, eligibility, and other requirements. These activities were funded as part of Mississippi's two DREF allocations (initial allocation - \$6,283,404 and additional allocation - \$5,438,712) to address unmet housing, infrastructure, and economic revitalization needs in counties designated as presidential disaster areas in 2008. The DREF allocation was utilized to fund additional activities within units of local government that may not have been funded in prior funding rounds or enhancements to projects that previously received funding. These funds were competitively awarded to eligible jurisdictions based on established scoring criteria for submitted applications. The activities funded from the DREF allocation were to be carried out by local governments; MDA would not directly administer any of the allocation. DREF funding provided support for essential infrastructure needs in disaster affected communities to benefit low- and moderate-income residents and address urgent needs. HUD staff reviewed the following DREF files, as noted in Table 3 below.

Table 3: Disaster Recovery Enhancement Fund Projects included in HUD's review

Activity	Budget
Adams Co – Pineview & Grafton Drainage	\$1,000,000
Adams Co – Kingston & Cloverdale Road	\$115,925
Centerville – Town of Centerville Drainage	\$192,255
Wilkinson Co – Bridge Replacement	\$937,600
City of Natchez – North Natchez Drainage	\$329,906
Jackson Housing Authority – Buyout/Drainage	\$250,000
Total	\$2,825,686

The monitoring review consisted of staff interviews and documentation review. HUD staff used these methods of evaluation to assess the State's overall program development, implementation, and oversight. HUD staff reviewed the program's policies and procedures, interviewed program staff, and also conducted detailed file reviews to ensure that the State's documentation correlated with the program's established DREF policies and procedures.

Each reviewed file contained documentation demonstrating that funded activities were CDBG eligible and met a national objective. The interviews with program staff indicated that program guidelines and responsibilities were being clearly identified, shared with the units of local governments and being properly executed. MDA staff was very helpful in responding to all program questions and requests. There were no findings or concerns.

Financial Management

The purpose of the financial management review is to determine whether CDBG disaster recovery funds for are being administered and disbursed appropriately. HUD staff reviewed the financial management systems, internal controls, procurement, tracking subrecipient audit reports, financial reporting, and drawdowns to confirm adequate controls and procedures comply with Office of

Management and Budget (OMB) and Federal statutory rules and regulations. The last financial review was conducted in February 2013. There are no open findings or concerns remaining from the previous financial monitoring.

Administrative and Financial Management Requirements

HUD reviewed MDA's expenditures for selected activities for these disaster grants. The purpose of this review was to assess the State's administrative and financial controls. Table 4 indicates the files included in the review.

Table 4: MDA Payment Requests included in Financial Management Review

Activity	CDBG-DR Draw Amount
B-06-DG-28-0001	
Administration	\$310,039
Construction/reconstruction of water/sewer lines or systems	\$8,753
Econ. development or recovery activity that creates/retains jobs	\$24,384,814
Rehabilitation/reconstruction of public facilities	\$2,028,144
Rehabilitation/reconstruction of residential structures	\$1,928
B-06-DG-28-0002	
Construction/reconstruction of water/sewer lines or systems	\$31
Rehabilitation/reconstruction of residential structures	\$714,584
B-08-DI-28-0001	
Rehabilitation/reconstruction of a public improvement	\$888
Rehabilitation/reconstruction of public facilities	\$6,000
Total	\$27,455,181

HUD examined selected CDBG-DR vouchers in excess of \$27 million. The State's vouchers include source documentation as defined in 24 CFR 570.489. Source records were accurate and well-documented. The separation of duties among staff requesting and approving payments was easily identified on each cash request form.

Procurement

HUD reviewed the procurement process for awarding Neighborhood Home Program (NHP) contracts. This process was in accordance with the State's procurement policy and complies with 24 CFR 85.36 requirements for firm fixed price contracts.

Single Audit Requirements

The MDA audit summary tracking report contained several deficiencies. Upon completing the analysis, HUD determined that there was a violation of the Office of Management and Budget (OMB) A-133 audit reporting requirements.

Finding 2

Subrecipients with open contracts were not being tracked in accordance with the (OMB) A-133 audit reporting requirements.

Conditions:

As the pass-through agency for the cognizant, MDA's system for tracking audit reports is either omitting subrecipients with open contracts or subrecipients with open contracts were given a status of not applicable (N/A).

Criteria:

OMB Circular A-133, Subpart D .400(d)(4) requires subrecipients to submit an annual audit report or a financial certification form (FCF). Subrecipients are not subject to A-133 requirements if spending is less than \$500,000 in federal funds for the fiscal year. When tracking audit requirements, a status of N/A should not be applied to subrecipients with active contracts.

Cause:

MDA did not identify all active subrecipients in the referenced annual report. The report should contain the grant number, contract number, contract end date, fiscal year end date, and the received date. Contracts that ended in the previous fiscal year were still being tracked on the report that was reviewed for fiscal year 2012.

Effect:

Improper reporting can lead to an inaccurate accounting of federal expenditures and other financial deficiencies.

Corrective Action:

HUD recommends MDA reformat the summary report to accurately reflect the subrecipients that are tracked. The summary report should contain contract numbers, contract end dates, and amounts disbursed during the fiscal year. MDA should then ensure that subrecipients submit the FCF, if the subrecipient is subject to audit requirements. MDA should also replace the columns labeled with yes and no, with the actual date the report or audit was due and with the date received.

Overall Management

HUD staff met with senior officers, directors, and staff of MDA. This review of overall management concentrated on coastal projects in Gulfport and Biloxi as well as overall management of all disaster grants. HUD staff met with Jon Mabry, Chief Operations Officer and Stacy McEachern, Deputy Chief Operations Officer, Chuck Bearman, Compliance Officer and Bill Thompson, Deputy Compliance Officer to discuss the citizen complaints, grant closeout, stalled projects, and OIG audits.

MDA continues to make progress implementing its programs and has begun to look at the grant close-out process as many of the projects are near end. HUD staff discussed the process which begins with individual projects closing and ultimately full grant close-out. MDA has already begun

the process with many of the projects and will seek guidance from HUD staff should they encounter roadblocks. Several of the projects that have been completed have remaining funds that MDA plans to reprogram to projects that need additional resources. Those funds may also be used for newly created projects that lack financial resources. MDA understands that newly created project must have a tie back to the disaster in order for it to meet the eligibility requirement detailed in the federal register notice.

Office of Inspector General Audits

HUD staff met with Chuck Bearman, Compliance Officer and Bill Thompson, Deputy Compliance Officer to discuss the progress of the ongoing OIG audit of the Gulf Coast Regional Infrastructure Program administered by the Mississippi Department of Environmental Quality (MDEQ). At the time of the review, OIG had completed its review and anticipates issuing the draft audit. As of the date of this report, the draft audit recommendations were being revised based on discussions with the OIG and MDA.

Neighborhood Home Program (NHP)

HUD staff met with Jon Mabry, Chief Operations Officer, Stacy McEachern and their staff to discuss the progress of the NHP. MDA continues to make progress administering the NHP. All eligible applicants are being processed. According to the NHP projections, MDA is on target in meeting its goals for completing all rehabilitation and reconstruction projects not later than the second quarter 2014.

Technical Assistance (Economic Development)

HUD staff met with Manning Phillips, Chief Administrative Officer, and his staff to discuss several projects that consist of economic development activities to create and retain jobs. Conversations will continue between MDA and HUD to discuss solutions regarding projects that did not meet their goals.

Citizen Complaints

Since the February monitoring visit, three complaints have been received by MDA. All of the complaints have been addressed and/or resolved in accordance with HUD requirements, policies, and procedures. Overall, MDA continues to administer the disaster recovery CDBG grants in an efficient manner and is making significant progress toward recovery.

The Department would like to thank MDA management and its staff for their efforts to work diligently with HUD, to ensure that grant fund subrecipients are performing and are compliant with all applicable laws and regulations pertaining to the CDBG-DR program.