

Capacity Assessment and Staffing Analysis

Community Development Block Grant
Disaster Recovery (CDBG-DR)



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Change Log

Version	Date	Description
1	7/29/2025	Capacity Assessment and Staffing Analysis

Overview

Following the disaster declaration of Hurricanes Debby, Helene, and Milton ("2024 Hurricanes"), the County of Manatee ("County") was allocated \$252,711,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds from the United States (U.S.) Department of Housing and Urban Development (HUD). These funds will support unmet needs in housing, infrastructure, mitigation, and planning, as outlined in the County's CDBG-DR Action Plan.

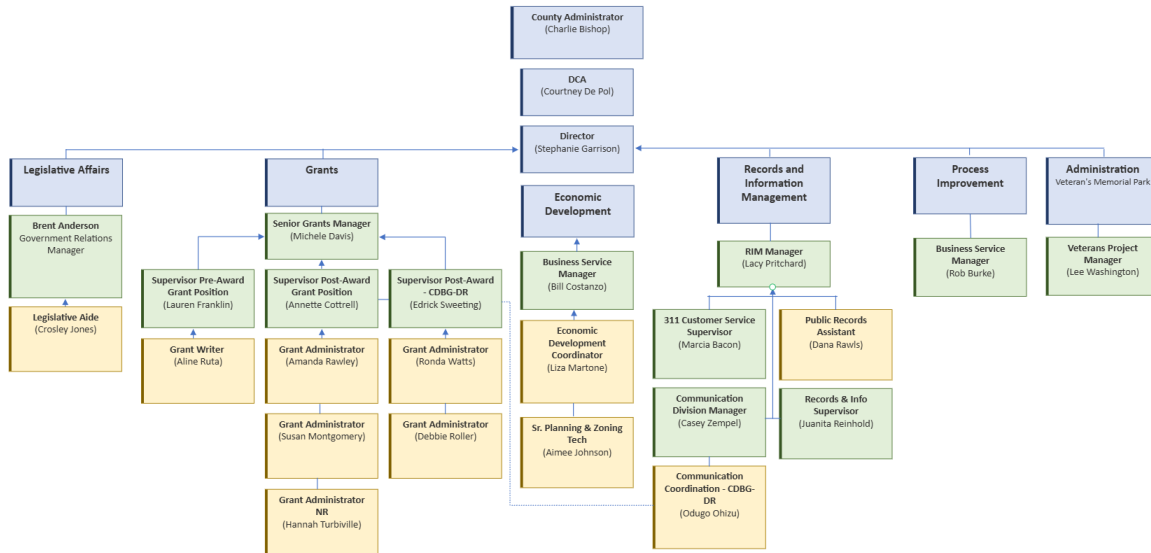
In accordance with HUD's January 8, 2025, [Federal Register Notice \(90 FR 1754\)](#) (Updated March 19, 2025) ("Revised Universal Notice"), the County conducted a capacity assessment and staffing analysis to demonstrate its ability to implement recovery programs and address any operational gaps.

The assessment evaluates current and planned staffing, organizational structure, and the use of contractors and subrecipients to support key functions such as management, compliance, procurement, environmental review, monitoring, and financial oversight. It will be updated regularly to reflect changes in staffing needs, program complexity, and risk, ensuring continued alignment with HUD requirements and effective program delivery.

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Organizational Charts

Figure 1 – Manatee County Government Relations Department Organizational Chart (Current)



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Responsible Units for Financial Management and Grant Compliance Certification Requirements

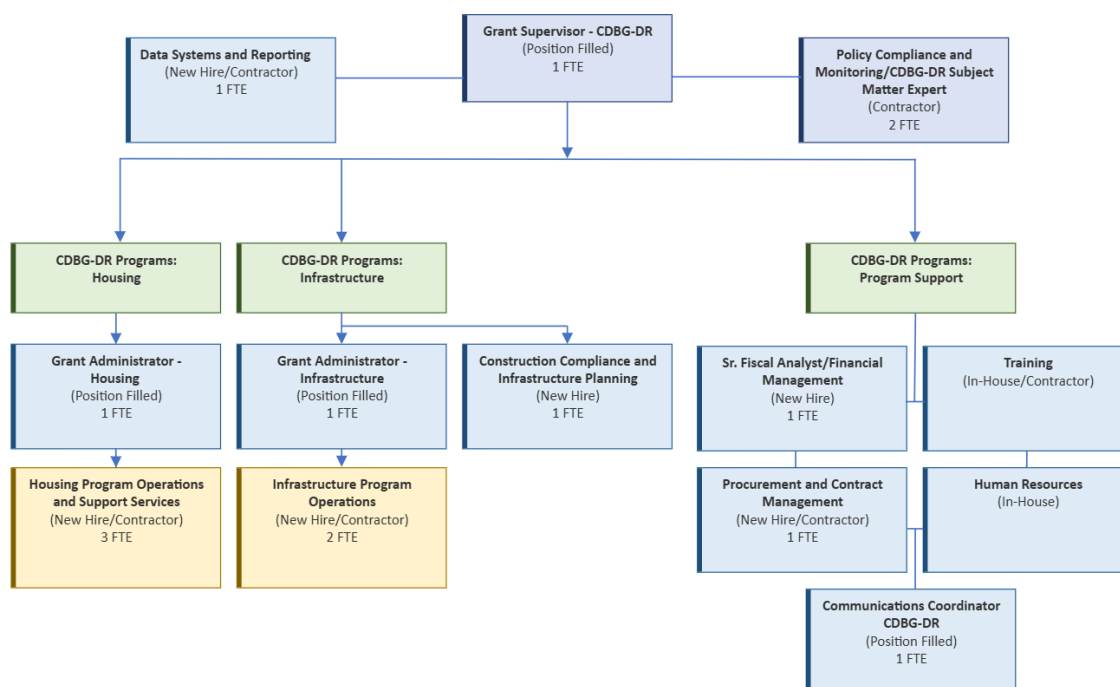
The organizational chart in *Figure 2* identifies key staff responsible for meeting HUD's Financial Management and Grant Compliance Certification Requirements as outlined in Section II.A.1.a through f. of the Revised Universal Notice. *Table 1* links each certification element to the corresponding organizational unit or staff title shown in the chart.

Table 1 – Organizational Responsibilities for HUD Capacity Requirements

HUD Requirement	Responsible Unit / Title in Organizational Chart
A. Proficient Financial Management Controls	Financial Management (under "Policy Compliance and Monitoring")
B. Procurement Procedures	Procurement and Contract Management (under "Policy Compliance and Monitoring")
C. Policies and Procedures for Maintaining a Comprehensive Disaster Recovery Website	Communications Coordinator (box labeled "Communications Coordinator – CDBG-DR")
D. Procedures to Detect and Prevent Fraud, Waste, and Abuse	Financial Management
E. Procedures to Prevent Duplication of Benefits (DOB)	Financial Management
F. Procedures to Ensure the Timely Expenditure of Grant Funds	Financial Management

Each of these functional responsibilities is housed within or overseen by the County's CDBG-DR Program Support team and associated contractors or staff. *Figure 2* reflects this structure and supports HUD's requirement for demonstrating sufficient capacity and internal controls.

Figure 2 – Manatee County CDBG-DR Organizational Chart (Projected)



Lead Principal Agency

The County's Grants Administration Division ("Division"), located within the Government Relations Department, serves as the lead agency responsible for the overall administration, implementation, and compliance of the CDBG-DR grant. This includes oversight of all program components, such as housing, infrastructure and planning activities. The Division has demonstrated experience in managing federal funds and aligning resources to implement housing and critical infrastructure investments. While the County may engage contractors and subrecipients to support program delivery, the County retains full accountability for meeting all HUD requirements, including financial controls, procurement, monitoring, and reporting.

Hierarchy of Program Accountability

The Grant Supervisor – CDBG-DR serves as the lead for all CDBG-DR program activities and is responsible for overall program direction, implementation, and compliance. The Grant Supervisor operates within the County's Grant Administration Division, the designated lead agency for CDBG-DR implementation. The Division ultimately reports directly to the County Administrator, who serves as the jurisdiction's chief executive officer. This tiered structure provides a clear chain of command and delineation of responsibilities, ensuring

accountability, risk management, and timely delivery of recovery programs. All functional areas report through their respective leads to the Grant Supervisor, ensuring unified oversight and coordination in alignment with HUD's performance, financial, and compliance expectations.

Capacity Assessment

The County conducted a capacity assessment to identify capacity gaps to carry out the recovery efforts outlined within the County's CDBG-DR Action Plan. While the County currently oversees the implementation and management of annual funds, such as CDBG, HOME, and ESG, these funds average approximately \$2.6 million annually. The CDBG-DR allocation of \$252,711,000 represents a substantial increase in program scale and complexity. To address this, the County will supplement capacity needs through a combination of targeted new hires, contractual support from experienced CDBG-DR implementation vendors, and strategic subrecipient partnerships to assist with program delivery and community engagement.

This assessment considered the current organizational structure, staff availability, internal controls, inter-departmental support, procurement systems, and monitoring processes. In accordance with HUD's Revised Universal Notice, the County evaluated its capacity across all required grant functions including program design, procurement, financial management, environmental review, compliance, monitoring, and reporting. The County is committed to maintaining full responsibility and accountability for all grant compliance and program performance, in accordance with HUD requirements.

Current Capacity

Given the significant increase in fund management beyond the current annual allocations, the County intends to utilize contractors and subrecipient support to oversee the management and implementation of various CDBG-DR programs. These roles will be supplemented by the County's current staff.

The County's Government Relations Department currently consists of 45 full-time employees organized across six key divisions: Grants Administration, Economic Development, Legislative Affairs, Records and Information Management, Process Improvement, and Administration (Veteran's Memorial Park). As demonstrated within *Figure 1*, these staff members may provide ad-hoc technical assistance to the CDBG-DR programs but are not available to dedicate full-time effort to disaster recovery activities due to their regular job

assignments. *Figure 2* outlines the proposed staffing structure for CDBG-DR, including newly created positions, contracted roles, and subrecipient functions. This structure is designed to:

- Ensure timely delivery of all recovery programs
- Maintain compliance with HUD financial and programmatic requirements
- Provide robust monitoring and reporting capacity
- Mitigate program delivery risk and prevent fraud, waste, or abuse

Each function within *Figure 2* will be staffed by individuals who have demonstrated either direct or related experience and will have clearly defined roles and responsibilities. The County will continuously reassess and adjust its staffing model throughout the grant lifecycle to address changing program needs and maintain alignment with HUD's capacity expectations.

Capacity Gaps

To evaluate the County's ability to implement its CDBG-DR programs effectively, the County conducted a staffing capacity analysis using HUD's Disaster Recovery Staffing Analysis Worksheet (2013 version, the most current available), as presented in *Table 2*. This analysis assessed both the functional roles required to administer the CDBG-DR grant and the staffing levels needed over the lifecycle of the program.

The analysis identified critical gaps in core functions such as program management, compliance, financial oversight, procurement, environmental review, monitoring, training, and communications. As a result of this assessment, the County will take a phased and flexible approach to staffing, which includes the following strategies:

Hiring approximately fifteen (15) full-time equivalent (FTE) positions, including:

- One (1) Grant Supervisor – CDBG-DR (position filled with new hire)
- Two (2) Program Leads for Housing, Infrastructure (positions filled with new hires)
- One (1) Communications Coordinator – CDBG-DR (position filled with new hire)

Deploy contractor support to fulfill key operational roles not covered by current County staff, including:

- Program management support
- Subject Matter Experts (e.g., housing, infrastructure delivery, cross-cutting requirements)
- Compliance and monitoring specialists
- Data analysts and administrative support
- Engaging municipal and subrecipient partners to support program implementation and enhance overall capacity

As shown in *Table 2*, several positions require a mix of County, contractor, and subrecipient resources to meet demand. The County acknowledges that staffing needs will evolve over time based on project phases and has developed a model that includes both flexibility and scalability. For example, contractor hours may be higher during program ramp-up, and County staff roles may increase over time as institutional knowledge grows, and program complexity stabilizes.

In alignment with HUD's Revised Universal Notice, the County will:

- Review staffing capacity at least annually and more frequently as needed based on program complexity, risk, and the pace of recovery. This includes key program milestones such as the launch of major programs, Notice of Funding Availability (NOFA) issuance, construction ramp-up, closeout preparations).
- Document any adjustments to staffing levels and provide justification for those changes, ensuring transparency and accountability in capacity planning.
- Ensure that staffing remains sufficient to support program compliance, operational efficiency, and risk mitigation throughout the duration of the CDBG-DR grant.

This ongoing evaluation will ensure that the County maintains adequate capacity and internal controls throughout the duration of the CDBG-DR grant.

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Table 2 - Capacity Needs and Gaps

CDBG-DR Role	Estimated Staffing Need (FTE)	Current Staffing (FTE)	Identified Gap (FTE)	Role Responsibilities	Staffing Options
Program Management <ul style="list-style-type: none"> Grant Supervisor – CDBG-DR CDBG-DR Subject Matter Expert Grant Administrator – Housing Grant Administrator – Infrastructure (Infrastructure Lead oversees Planning) 	4	3	1	<ul style="list-style-type: none"> Provide oversight, management, and compliance of programs Develop and track timelines and milestones for progress Manage and address amendments to Action Plan Manage and assess risk of program changes and implementation Oversee program development and implementation Lead infrastructure project planning, procurement coordination, construction oversight, environmental compliance (NEPA/state coordination if applicable), and documentation 	New Hire / Contractor
Policy Compliance and Monitoring <ul style="list-style-type: none"> CDBG-DR Subject Matter Expert(s) Construction Compliance and Infrastructure Planning 	2	0	2	<ul style="list-style-type: none"> Develop and maintain policies and procedures for program implementation Serve as CDBG-DR regulatory expert to staff Respond to HUD monitoring and audit concerns Monitoring activities, including internal and subrecipient monitoring, to ensure compliance with policies and procedures Monitor compliance including URA, Section 3, labor standards (Davis-Bacon), Conflict of Interests, 104(d); oversee policy development, acquisition/relocation documentation, and risk assessments Oversee infrastructure planning and study efforts Lead fair housing compliance training and tracking; address and document complaints 	New Hire / Contractor
Financial Management <ul style="list-style-type: none"> Sr. Fiscal Analyst 	1	0	1	<ul style="list-style-type: none"> Develop and track budgets Review invoices and make timely payments DRGR voucher submissions 	New Hire

				<ul style="list-style-type: none"> • Manage financial controls, DOB, expenditure tracking, and financial reporting. Includes independent audit oversight reporting to the County Administrator¹ • Compliance with HUD financial management requirements 	
Procurement and Contract Management	1	0	1	<ul style="list-style-type: none"> • Develop and manage contract RFQs, RFPs, etc. for select programs • Compliance with 2 CFR 200.317-327 and other relevant procurement requirements • Make contract awards and prepare contracts and agreements • Develop and execute contracts with contractors • Develop and execute agreements with beneficiaries of projects • Complete HUD required contract reporting • Ensure timely procurement timelines to avoid delays in program delivery 	New Hire / Contractor
Data Systems and Reporting	1	0	1	<ul style="list-style-type: none"> • Develop and maintain systems to track applications, funding awards, and expenditures • Develop reporting functions that track program status and collect HUD QPR reporting information • Manage DRGR • Conduct data management and quality assurance • Develop forms and procedures for QPR reporting • Compliance with data reporting and management requirements 	New Hire / Contractor
Training ²	0	0	0	<ul style="list-style-type: none"> • Conduct initial and continuing training for all staff and partners involved in CDBG-DR program • Create job aids for various functions and program staff 	In-House / Contractor

¹ The County will ensure that internal audit functions related to the CDBG-DR grant reports independently to the County Administrator, in accordance with HUD's Revised Universal Notice requirements.

² Training will be provided by a combination of County and contracted staff related to their assigned program areas and subject matter expertise.

Human Resources ³	0	0	0	<ul style="list-style-type: none"> • Draft job descriptions for all new positions • Recruit and interview staff for program support • Conduct ongoing hiring and orientations • Oversee the performance review process 	In-House
Communications Coordinator CDBG-DR	1	1	0	<ul style="list-style-type: none"> • Develop and maintain content for the CDBG-DR webpage • Develop flyers, handouts, advertisements, etc. • Facilitate citizen outreach and engagement • Advertise how residents can participate in programs, apply for funding, etc. • Review all public facing documentation for branding and “unified voice” • Serve as point of contact for all media inquiries about program • Serve as the grantee’s primary point of contact for the receipt of Freedom of Information Act requests • Compliance with the County’s Citizen Participation Plan, accessibility, and citizen participation requirements 	New Hire
Program Operations and Support Services: Housing ⁴	3	0	3	<ul style="list-style-type: none"> • Develop detailed policies, procedures, processes, and applicable supporting documentation for program • Manage and implement program activities according to policies and procedures • Review all applicants and/or applications for eligibility (i.e., case management) • Oversee contractors and construction of housing projects, including compliance with Davis-Bacon and Section 3 as applicable • Complete environmental reviews • Submit information for QPRs 	New Hire / Contractor

³ Human Resource functions will be provided by County Human Resources staff.

⁴ The 3 FTEs identified represent core staffing for housing operations. Additional temporary or contracted support will be deployed during intake surges or periods of high construction volume to ensure continued responsiveness and compliance.

				<ul style="list-style-type: none"> Review payment requests, track project statuses, and ensure final financial reconciliation 	
Program Operations: Infrastructure	2	0	2	<ul style="list-style-type: none"> Develop detailed policies, procedures, processes, and applicable supporting documentation for program Develop scopes of work and independent cost estimates Develop and publish NOFAs Review all applicants and/or applications for eligibility Manage and implement program activities according to policies and procedures Oversee contractors for infrastructure projects, including compliance with Davis-Bacon and Section 3 Complete environmental reviews Complete plan and cost reviews Conduct progress inspections Submit information for QPRs Review payment requests, track project statuses, and ensure final financial reconciliation 	New Hire / Contractor / Subrecipient
Total	15	4	11	-	-

Timeline and Method of Addressing Capacity Gaps

The County will address capacity gaps through a variety of methods, including new hires, contractor support, and subrecipient program implementation. This flexibility and scalable approach will ensure timely program delivery and full compliance with HUD's CDBG-DR requirements over the full lifecycle of the grant.

New Hires

The County will staff approximately fifteen (15) FTE positions through a combination of new County hires and contracted personnel. These positions will require demonstrated project management experience, and the selected candidates will receive CDBG-DR training via internal or contracted staff covering regulatory compliance, program design, financial management, and cross-cutting federal requirements. Most of these positions will be term-limited or funded for the duration of the CDBG-DR program and are not anticipated to transition into permanent County roles. These positions are central to the County's long-term capacity and will provide continuity beyond initial program launch. These positions can be seen in *Figure 2*.

Contractor Support

Contractor resources will be used to supplement County staffing and support specialized functions that may be time-limited, technical, or variable in intensity over the grant period. Contractor roles include program management support, CDBG-DR subject matter experts, policy and compliance personnel, procurement and contract management support, and operational support positions for each program area outlined within the CDBG-DR Action Plan. This will also include specialized support in areas such as environmental reviews, plan and cost reviews, and inspections. Contractors with appropriate CDBG-DR subject matter expertise may provide training to County staff, municipal partners, and subrecipients on areas of support identified by the County. These contractors will be subject to oversight, deliverable-based tracking, and performance monitoring in accordance with HUD procurement rules and the County's internal policies. These positions can be seen in *Figure 2*.

Subrecipient Implementation

The County may engage subrecipients to support the implementation of specific program activities. Each program's policies and procedures will outline the application and selection process for subrecipients. Once selected, subrecipients will be responsible for carrying out defined activities in accordance with the terms of their subrecipient agreements. To ensure timely recovery and compliance with CDBG-DR regulations, the County will require that all subrecipients undergo CDBG-DR training covering regulatory compliance, program design, financial management, and cross-cutting federal requirements. Additionally, the County will provide ongoing oversight and technical assistance throughout the duration of program implementation.

Ongoing Staffing Evaluation

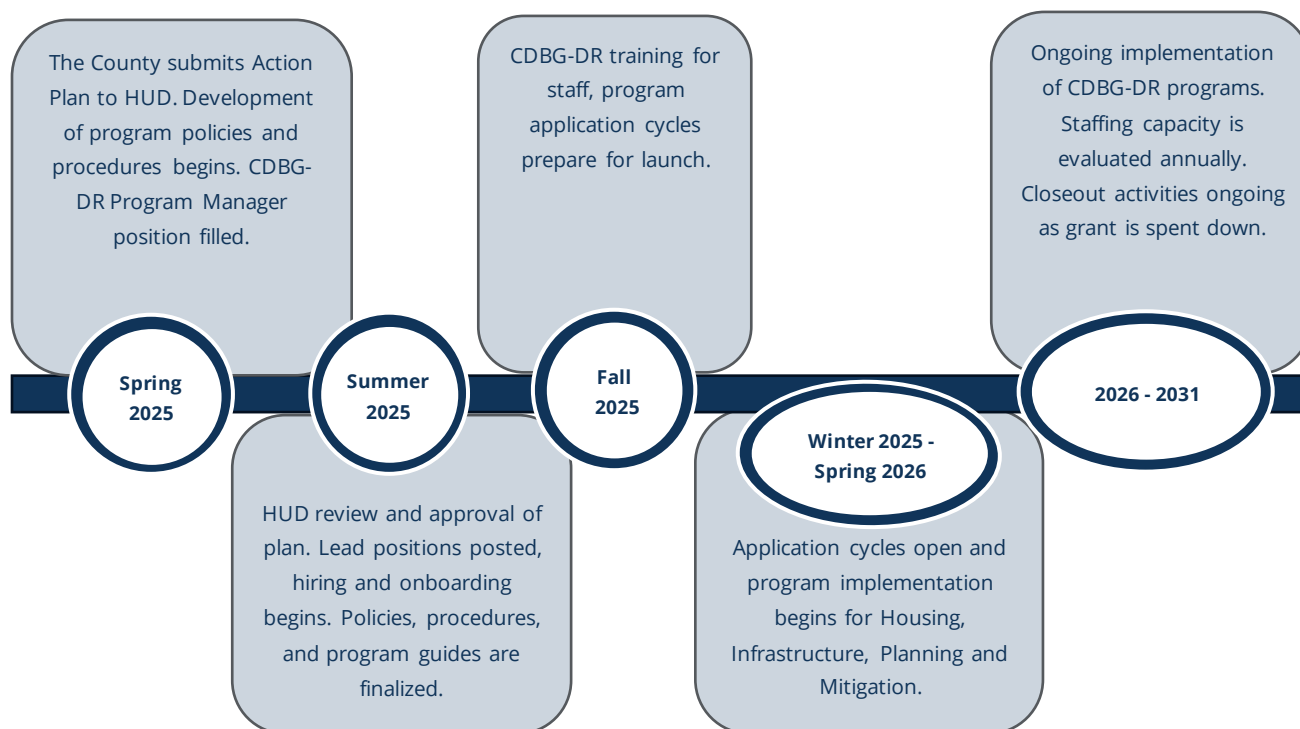
To remain responsive to evolving program needs and risk factors, the County will conduct annual staffing assessments or more frequently based on program milestones such as:

- Completion of procurement or environmental reviews
- Launch of major programs
- Ramp-up of construction activity
- Drawdown thresholds

These assessments will evaluate whether staff capacity remains sufficient and will recommend adjustments such as additional hires, contractor extensions, or staff reallocation. This proactive approach ensures long-term capacity sustainability, risk mitigation, and full compliance with HUD's performance and financial oversight requirements. *Figure 3* demonstrates the timeline and key milestones associated with filling staffing capacity gaps for the implementation and management of the CDBG-DR grant.

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Figure 3 – Timeline of Addressing Capacity Gaps



Open CDBG-DR Findings and Corrective Actions

Findings refer to deficiencies in program performance based on material noncompliance with statutory, regulatory, and/or program requirements. Corrective actions are formal steps taken to address and resolve such deficiencies in accordance with HUD oversight protocols.

As of the date of this capacity assessment, the County does not have any open CDBG-DR findings or corrective actions. Additionally, the County does not have any open findings or corrective actions under its regular CDBG or HOME entitlement programs. The County maintains internal controls, monitoring procedures, and regular staff training to proactively identify and resolve issues before they escalate to the level of a formal finding. These include:

- Ongoing internal monitoring and quality assurance reviews
- Annual third-party financial audits
- Regular policy and procedure updates
- Formal risk assessments and mitigation strategies

The County is committed to full compliance with HUD requirements and to implementing a transparent and accountable disaster recovery program. Should any findings arise in the future, the County will respond promptly with a documented corrective action plan, timeline, and follow-up to ensure resolution to HUD's satisfaction.