



HOME Program
Monitoring
(Q3&Q4)
Departmental
Response

May 18, 2018

Frankie Atwater, Sr., Director
Department of Community Development

May 18, 2018

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Finding 1 – Ineffective Management of Staff

FCCDD Response

Disagree

There is adequate management in place to provide oversight of HOME program staff.

- Lines of authority are clear and established through job descriptions and the Departmental Organization Chart. *(Please see attached as Exhibit I)*
- The Division Manager conducts bi-weekly meetings with HOME program staff to discuss projects, program direction and the role each staff will play in completing work assignments. Job descriptions have also been discussed with staff. *(Please see attached Exhibit II)*
- In reference to how staff “felt”, the Department of Community Development is unable to provide an objective response to that audit finding/claim.
- See response above. *(Please see sample agenda attached as Exhibit III)*
- The Department of Community Development is not able to respond to the statement, “Furthermore, there were other concerns that were raised which were not under the purview of this audit and should be addressed by the appropriate authority”.

The Department of Community Development was challenged to determine whether “Finding 1” was an actual “audit finding”, rather than a “concern” based on the language in the second sentence of the second paragraph and the first sentence of paragraph three, both in “Finding 1”

Progress to Date – The Department will continue to provide program updates as necessary during the bi-weekly meetings with staff. We have also sent the organizational chart, electronically, to each employee to reinforce reporting relationships.

Finding 2 – Lack of Written Reorganization Plan

FCCDD Response

Disagree

A written reorganization plan is not required at this time. While administrative changes have been made, and new employees are in place, the department is still exploring whether a full reorganization is necessary at this time. We will continue to work with the County Manager and Chief Strategy Officer to determine necessary reorganization plans. If a determination is made that reorganization is needed, the department will follow the recommendation to develop a written reorganization plan and communicate organizational changes.

Finding 3 – De-Obligation of Funding

FCCDD Response

Partially Agree

The lack of a strong pool of private nonprofit, community-based, service organizations in Fulton County that qualify as Community Housing Development Organizations (CHDO’s) continues to impact the County’s ability to use 15% of HOME funds to assist with the development of affordable housing in Fulton County outside of the City of Atlanta. The Fair Housing Act requires that participating jurisdictions set-aside 15% of HOME funding to support CHDO activity. The lack of a qualified pool of CHDO’s is not unique to Fulton County but is representative of a needed national change.

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Recommendations – We agree with the recommendations. As such we have moved forward with developing the following corrective action plan:

1. Standard operating procedures – *Expected completion is December 2018*
2. Internal Grant Monitoring reports – *In place and an ongoing process*
3. Scheduled Work Sessions with Fulton County Grants team – *In place and an ongoing process*

Finding 4 – Departure from Established Draw Process

FCCDD Response

Disagree

The layers of review the department adopted for draw-downs is not a HUD mandate, but an internal procedure that was implemented in direct response to the 2008 HUD Office of Inspector General (OIG) audit and an effort to correct staff's past performance problems in this area. However, this process did not prove plausible, as many errors were still not being caught. As such, the department did not circumvent the level of review and has not departed from the established draw-down process. The Department of Community Development has implemented additional audit controls, which strengthened the process by incorporating it into the AMS/IDIS comprehensive reconciliation and centralized the task to one staff person within the department.

Finding 5 – Program Expenditures Exceeded Funded Amount

FCCDD Response

Agree

In 2015 the Department Director made a strategic decision to temporarily move the Tenant Based Rental Assistance (TBRA) program back to the County for administration. This decision was a result of non-compliance by the Fulton County Housing Authority, the administrator of the program, and their outstanding debt to the County in excess of \$400K for improper management of past programs. The TBRA transition was a unique endeavor for the department as the County is not adequately set-up to provide the level of administrative support needed to administer direct services (i.e., rental payments, late fees, etc.) Due to late fees, adjustments to the rent payments, and other mitigating factors, the cost overruns were an unpredictable result. The department's ultimate goal was to ensure no families were removed from their home and forced into homelessness due to non-payment of rent; as to do so could jeopardize other federal monies the department receives. After months of negotiations it was decided that the County would not renew its agreement with the Housing Authority and consequently funding was not increased to cover the cost overage. However, the department is exploring alternative ways to reallocate the TBRA dollars.

Recommendations - To ensure financial and performance information is reported into the HUD Integrated Disbursement and Information System (IDIS) accurately, the department has established the following:

1. Internal Grant Monitoring
2. Weekly grants monitoring
3. Scheduled Work Sessions with Fulton County Grants team

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Finding 6 – Lag in Completion of AMS & IDIS Reconciliation

FCCDD Response

Disagree

The Department does not have control over the County's AMS system. The Department is held accountable for the grant-specific accounting functions as tracked in HUD's Integrated Disbursement and Information System (IDIS). As such, with IDIS the department is able to effectively track the progress of activities, monitor the amount of funds by program that are funded and drawn for an activity, and ensure that activities are being completed in a timely manner. It is through the information posted in IDIS, not AMS, that HUD makes decisions around the reduction and/or recapture of funds. For this reason, the department uses IDIS as our primary tracking tool for fund commitments and expenditures.

Progress to Date – The department hired a Financial Systems Manager in 2016 to oversee the Departments financial and reporting requirements by HUD. The Financial Systems Manager is also managing the reconciliation of accounts between IDIS and AMS.

Finding 7 – Incompliance with Administrative Costs Requirements

FCCDD Response

Disagree

The Department has implemented a time keeping system that tracks staff time based on how they are labor distributed. *(Please see attached as Exhibit IV)*

Finding 8 – Failure to Adequately Conduct Environmental Reviews

FCCDD Response

Partially Agree

HUD conducted a review on past projects from FY2009-2012 and found that the Departmental reviews conducted during that time were either incomplete, not performed or out of compliance.

In February of 2018 the Department received notice from HUD that our environmental process and our capacity to conduct environmental reviews are consistent with the National Environmental Policy Act Standards outline in Title 24 Code of Federal Regulations Part 58.

Staff continues to attend scheduled training conducted by HUD's environmental team.

Habitat for Humanity of North Georgia. - The homeowner in the Habitat program was not displaced, but voluntarily chose to stay with her neighbor and subsequently declined the department's offers for temporary hotel accommodations. More importantly, staff provided the homeowner with a brochure that explains Temporary Relocation and the homeowner signed an Anti-displacement Notice, which acknowledges that the County's process had been communicated.

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Finding 9 – Nonperformance of Program Goals

FCCDD Response

Agree

Because of the many legacy issues plaguing the implementation of the HOME program and the ongoing reconciliation process, the Department is only able to report limited success. Our goal is to increase the level of assistance during the 2018-2019 program years.

Corrective Action – The department has established a process for reviewing project and program activities on a bi-weekly basis. In addition, the following has also been implemented:

1. Internal Grant Monitoring
2. Weekly grants monitoring
3. Scheduled Work Sessions with Fulton County Grants team

Finding 10 – Delay in Submitting CAPER to HUD

FCCDD Response

Disagree

HUD approved our request for an extension prior to the due date of the Consolidated Annual Performance Report (CAPER). HUD did not issue a finding in reference to the CAPER.

Audit Concern 1 – Possible Default of the Expenditure Deadline

FCCDD Response

A qualified Community Housing Development Organization (CHDO) has recently been selected to receive CHDO funding that will assist with the development of affordable housing in Fulton County. The award will expend the remaining 2011 CHDO funds.

Audit Concern 2– Potential Repayment of HUD Funds

FCCDD Response

HUD conducted a review on past projects from FY2009-2012 and found that the Departmental reviews conducted during that time were either incomplete, not performed or out of compliance.

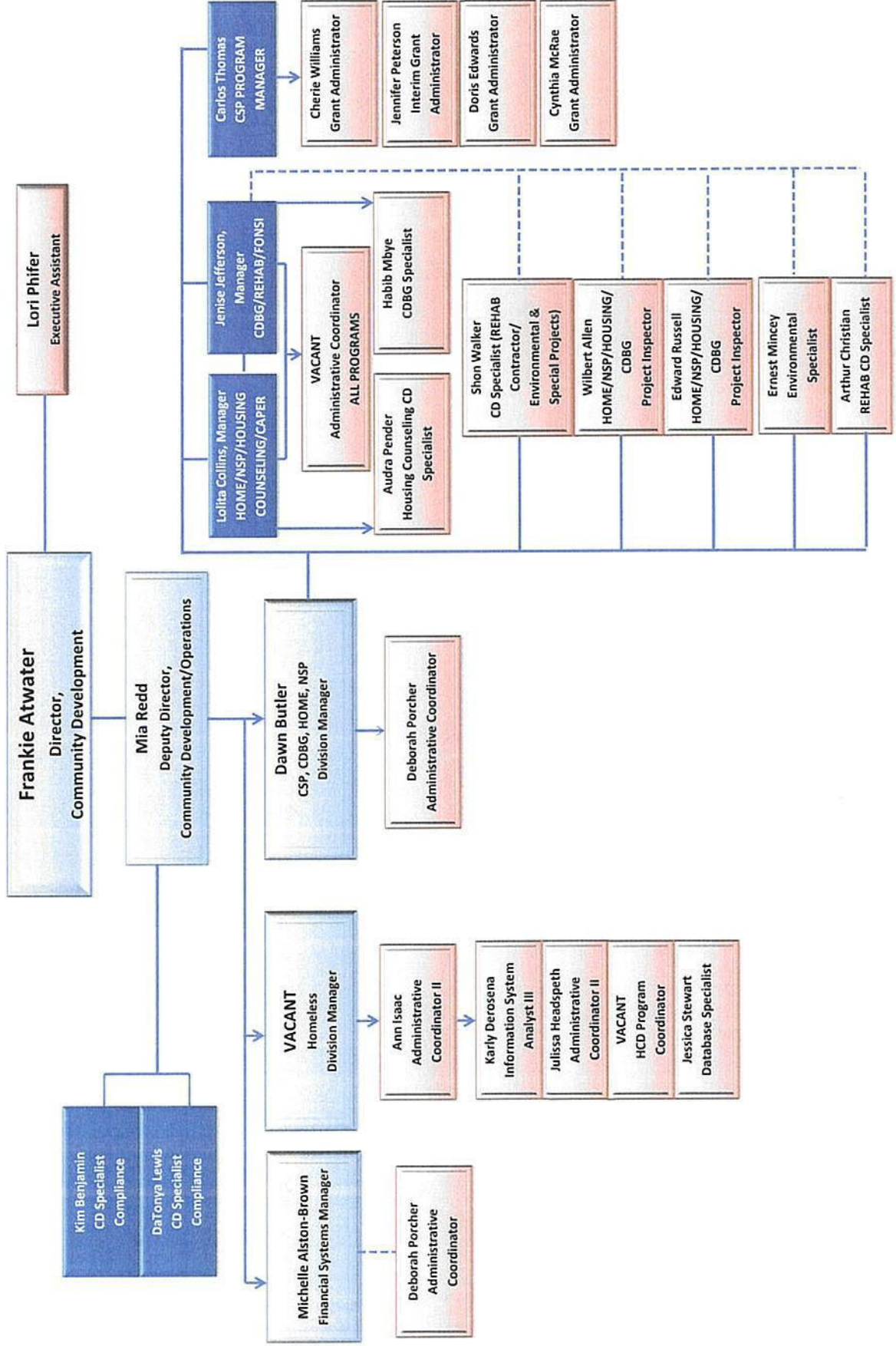
In February of 2018 the Department received notice from HUD that our environmental process and our capacity to conduct environmental reviews are consistent with the National Environmental Policy Act Standards outline in Title 24 Code of Federal Regulations Part 58.

To date the County has not received notice from HUD requesting repayment of HOME funds.

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Attachments

DEPARTMENT OF COMMUNITY DEVELOPMENT ORGANIZATION CHART



FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Manager

CLASS CODE:	EEO CODE:	SALARY RANGE:	FLSA STATUS:	PHYSICAL PROFILE:	TEST CATEGORY:
202416	B	C52	Exempt	#2	E

JOB SUMMARY: Incumbent in this class performs duties related to overseeing the administration of federally funded community development projects and providing oversight of the financial/program administration and contract compliance activities of Community Development Block Grant (CDBG), Neighborhood Stabilization Program (NSP), and HOME program projects. Responsibilities include managing assigned staff, identifying eligible development projects, recommending funding, and preparing grant proposals.

DISTINGUISHING CHARACTERISTICS: This is the second level within a two-level community development classification series. Community Development Manager is distinguished from Community Development Specialist in that the former oversees the administration of grant funds and projects in addition to managing assigned staff, whereas the latter identifies and recommends eligible projects for federal funding. This series is distinguished from the Economic Development series by its emphasis on the administration of federal funding for housing and other community development projects rather than on the promotion of business growth and employment opportunities.

ESSENTIAL DUTIES: (This list is a representative sample: position assignments may vary.)

- Manages assigned staff, including establishing workloads, prioritizing work assignments, evaluating employee performance, interpreting and enforcing policies and procedures, resolving staff issues, making hiring or termination decisions/recommendations, and administering disciplinary action as required.
- Oversees the administration and contract compliance management of federal and local grant funds provided for community development; Community Development Block Grant (CDBG), Neighborhood Stabilization Program (NSP), and HOME programs; and/or housing projects within Fulton County and its municipalities.
- Develops/presents comprehensive reports, business studies, and findings.
- Prepares, updates, and amends cooperative agreements.
- Develops action plans and creates strategies and methods for establishing policy for projects.
- Assists in developing policies and procedures to govern grants and programs.
- Conducts reporting and recordkeeping activities in accordance with federal and local requirements.
- Identifies and evaluates eligible developmental projects and prepares grant proposals and recommendations for federal funding.
- Monitors and ensures compliance with all grant conditions by sub-recipients and authorizes payments.
- Provides financial management of grant-funded projects, including preparing operating budgets, reports, and cost allocations; managing expenses; and ensuring appropriate audit controls.
- Consults with and serves as a County liaison to governmental funding agencies.
- Meets with County administrators and officials to initiate and execute community development or CDBG, NSP, and HOME and housing projects.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Manager

KNOWLEDGE: (position requirements at entry):

Knowledge of:

- Principles and practices of management and supervision;
- Principles and practices of grants development and administration;
- Principles and practices of governmental purchasing and contracts administration;
- Principles and practices of financial management;
- Principles and practices of CDBG, NSP, and HOME financial management systems;
- Laws, rules, and regulations governing community development and CDBG, NSP, and HOME and housing programs and activities;
- Grant-funded project management practices;
- Fair housing and equal opportunity laws and regulations;
- Contract compliance processes and procedures;
- The Integrated Disbursement and Information System (IDIS) federal database;
- Methods and techniques used to collect and analyze statistical data;
- Various public and private sector financial programs;
- Generally Accepted Accounting Principles (GAAP) and Governmental Accounting Requirements (GAR);
- Personal computers and related software.

SKILLS: (position requirements at entry):

Skills in:

- Managing and supervising staff;
- Organizing and prioritizing work;
- Managing multiple projects simultaneously;
- Resolving problems and making decisions;
- Interpreting maps, drawings, and construction plans;
- Applying statistical and analytical tools and methods;
- Analyzing and evaluating financial plans, budgets, and accounting and disbursement procedures;
- Accessing/operating the Integrated Disbursement and Information System (IDIS) database;
- Developing grant proposals and administering grant funding;
- Interpreting rules, regulations, policies, and procedures governing federally-funded grants awarded to local governments and not-for-profit organizations;
- Coordinating projects involving public and private organizations;
- Preparing and presenting oral and written communications/reports;
- Conducting effective presentations;
- Operating personal computers, including spreadsheet, database, word processing, presentation, and other related software;
- Establishing and maintaining effective working relationships with other County personnel, officials, and the general public;
- Communication and interpersonal techniques as applied to interaction with coworkers, supervisor, the general public, etc., sufficient to exchange or convey information and to receive work direction.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Manager

EXPERIENCE AND TRAINING: (position requirements at entry):

Contract Compliance Management:

Completion of course work equivalent to the academic requirements of a Bachelor's degree in business or public administration, finance, planning, marketing, or a related field; and five (5) years experience in managing and monitoring grants and program activities (including oversight of CDBG, NSP, and HOME project grants) or economic development, including two (2) years supervisory experience; or an equivalent combination of education and experience sufficient to successfully perform the essential duties of the job such as those listed above.

Financial Reporting Management:

Completion of course work equivalent to the academic requirements of a Bachelor's degree in business or public administration, finance, planning, marketing, or a related field; and five (5) years experience in financial underwriting (including oversight of CDBG, NSP, and HOME project grants) or economic development, including two (2) years supervisory experience; or an equivalent combination of education and experience sufficient to successfully perform the essential duties of the job such as those listed above.

Program Administration Management:

Completion of course work equivalent to the academic requirements of a Bachelor's degree in business or public administration, finance, planning, marketing, or a related field; and five (5) years experience in managing housing program operations and activities (including oversight of CDBG, NPS, and HOME project grants) or economic development, including two (2) years supervisory experience; or an equivalent combination of education and experience sufficient to successfully perform the essential duties of the job such as those listed above.

LICENSING REQUIREMENTS: (position requirements at entry):

- Valid State of Georgia Driver's License or proof of mobility equivalent may be requested;
- *Professional certifications related to Housing and Urban Development (HUD) recognized financial systems are preferred.*

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Manager

PHYSICAL REQUIREMENTS:

Positions in this class typically require sitting, standing, walking, fingering, mobility, talking, hearing, and seeing.

Sedentary Work: Exerting up to 10 pounds of force occasionally and/or a negligible amount of force frequently or constantly to lift, carry, push, pull, or otherwise move objects, including the human body. Sedentary work involves sitting most of the time. Jobs are sedentary if walking and standing are required only occasionally and all other sedentary criteria are met.

Physical Profile:

This is a Category #2 Physical Profile class and position. All applicants for initial entry by outside hiring into a permanent Fulton County position in this category shall be required to conform to **Part II** of the physical profile standards and criteria as approved and established by Personnel Board resolution dated November 1, 1988.

Classification History: Revised by Fulton County Personnel 11/12/08.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Specialist

CLASS CODE:	EEO CODE:	SALARY RANGE:	FLSA STATUS:	PHYSICAL PROFILE:	TEST CATEGORY:
202412	B	C43	Exempt	#2	B

JOB SUMMARY: Incumbent in this class performs duties related to administering federally funded community developmental projects. Responsibilities include identifying eligible community development projects, preparing grant proposals, monitoring community grants for compliance by recipients, and providing financial management of grant-funded projects.

DISTINGUISHING CHARACTERISTICS: This is the first level within a two-level community development classification series. Community Development Specialist is distinguished from Community Development Manager in that the former identifies and recommends eligible projects for federal funding, whereas the latter oversees the administration of grant funds and projects in addition to managing assigned staff. This series is distinguished from the Economic Development series by its emphasis on the administration of federal funding for housing and other community development projects rather than on the promotion of business growth and employment opportunities.

ESSENTIAL DUTIES: (This list is a representative sample: position assignments may vary.)

- Administers federal grant funds provided for community development within Fulton County and its municipalities.
- Prepares, updates, and amends cooperative agreements.
- Identifies eligible development projects and recommends funding, conducts evaluation and ranking of proposals, and prepares grant proposals and recommendations for federal funding.
- Monitors and ensures compliance with all grant conditions by sub-recipients, including labor and set-aside requirements.
- Provides financial management of grant-funded projects; prepares operating budgets, reports, and cost allocations; manages expenses; and ensures appropriate audit controls.
- Conducts site visits to monitor performance.
- Prepares graphical data displays; performs various studies to produce data; and collects, organizes, and evaluates data.
- Provides technical assistance to sub-recipients and other agencies.
- Develops and revises policies and procedures governing program administration.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Specialist

KNOWLEDGE: (position requirements at entry):

Knowledge of:

- Laws, rules, and regulations governing community development programs and activities;
- Principles and practices of grants development and administration;
- Grant-funded project management practices;
- Principles and practices of governmental purchasing and contracts administration;
- Fair housing and equal opportunity laws and regulations;
- Contract compliance processes and procedures;
- Methods and techniques used to collect and analyze statistical data;
- Various public and private sector financial programs;
- Principles and practices of financial management;
- Generally Accepted Accounting Principles (GAAP) and Governmental Accounting Requirements (GAR);
- Personal computers and related software.

SKILLS: (position requirements at entry):

Skills in:

- Interpreting maps, drawings, and construction plans;
- Applying statistical and analytical tools and methods;
- Coordinating multiple projects simultaneously;
- Conducting effective presentations;
- Developing grant proposals and administering grant funding;
- Interpreting rules, regulations, policies, and procedures governing federally-funded grants awarded to local governments and not-for-profit organizations;
- Coordinating projects involving public and private organizations;
- Resolving problems and making decisions;
- Preparing and presenting oral and written communications;
- Operating personal computers, including spreadsheet, database, word processing, presentation, and other related software;
- Establishing and maintaining effective working relationships with other County personnel, officials, and the general public;
- Communication and interpersonal techniques as applied to interaction with coworkers, supervisor, the general public, etc., sufficient to exchange or convey information and to receive work direction.

EXPERIENCE AND TRAINING: (position requirements at entry):

Completion of course work equivalent to the academic requirements of a Bachelor's degree in business or public administration, finance, planning, marketing, or a related field; and three (3) years experience in grants administration or economic development; or an equivalent combination of education and experience sufficient to successfully perform the essential duties of the job such as those listed above.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Community Development Specialist

LICENSING REQUIREMENTS: (position requirements at entry):

- Valid State of Georgia Driver's License (*as required by position assignment*).

PHYSICAL REQUIREMENTS:

Positions in this class typically require standing, walking, grasping, fingering, driving, talking, hearing, and seeing.

Light Work: Exerting up to 20 pounds of force occasionally, and/or up to 10 pounds of force frequently, and/or a negligible amount of force constantly to move objects. If the use of arm and/or leg controls requires exertion of forces greater than that for Sedentary Work and the worker sits most of the time, the job is rated for Light Work.

Physical Profile:

This is a Category #2 Physical Profile class and position. All applicants for initial entry by outside hiring into a permanent Fulton County position in this category shall be required to conform to **Part II** of the physical standards and criteria as approved and established by Personnel Board resolution dated November 1, 1988.

Classification History: Draft revised by Fulton County Personnel 3/30/07.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Inspector

CLASS CODE:	EEO CODE:	SALARY RANGE:	FLSA STATUS:	PHYSICAL PROFILE:	TEST CATEGORY:
505122	G	B21	Non-Exempt	#2	B

JOB SUMMARY: Incumbent in this class performs operational duties related to inspecting residential, commercial, and business properties for code compliance. Responsibilities include inspecting new and existing properties for code compliance, preparing reports, issuing violation notices, and preparing cases for court.

DISTINGUISHING CHARACTERISTICS: This is the first level within a three-level inspector classification series. Inspector is distinguished from Inspector, Senior in that the former inspects new and existing properties for code compliance, whereas the latter provides lead direction to assigned staff as required and interprets County building codes for builders, developers, and other interested parties in addition to conducting assigned inspection activities.

ESSENTIAL DUTIES: (This list is a representative sample: position assignments may vary.)

- Inspects new and existing properties for compliance with County codes related to building, grading, zoning, and safety laws and issues citations or violation notices for non-compliance.
- Inspects new and existing residential properties for conformance to codes, regulations, plans, specifications, and standards related to foundations, framing, electrical, plumbing, access, life safety, energy compliance, and other functional elements.
- Develops and maintains construction/building inspection files and logs.
- Prepares reports, correspondence, and requests for progress payments.
- Responds to questions from the general public regarding inspection schedules, inspection results, and code compliance.
- Prepares reports regarding inspection activities and code violations and assists appropriate prosecuting entity with preparing court cases.
- Consults with developers, engineers, architects, property owners, and contractors regarding code requirements.
- Responds to questions or concerns raised by homeowners or other interested parties related to code violations.
- Issues citations or stops work in progress depending on the nature of the infraction, documents actions, and testifies in court as required.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Inspector

KNOWLEDGE: (position requirements at entry):

Knowledge of:

- Construction methods used in residential, commercial, and industrial projects;
- Laws, rules, and regulations governing inspection activities;
- Methods and techniques used in conducting mechanical, electrical, plumbing, business, building, and construction inspections;
- Inspection tools and equipment;
- Codes related to building, grading, zoning, and safety issues;
- Occupational hazards and safety regulations related to the inspections industry;
- Personal computers and related software.

SKILLS: (position requirements at entry):

Skills in:

- Conducting mechanical, plumbing, electrical, business, building, and/or construction inspections;
- Using inspection tools and equipment;
- Preparing and presenting narrative reports of inspection activities;
- Interpreting and enforcing inspection codes and regulations;
- Reading blueprints, plans, and specifications;
- Maintaining accurate records and files;
- Operating personal computers, including word processing and other related software;
- Establishing and maintaining effective working relationships with other County personnel, officials, and the general public;
- Communication and interpersonal techniques as applied to interaction with coworkers, supervisor, the general public, etc., sufficient to exchange or convey information and to receive work direction.

EXPERIENCE AND TRAINING: (position requirements at entry):

Completion of course work equivalent to the academic requirements of a High School diploma or G.E.D. equivalent; and two (2) years journeyman level experience working in a building trade or a related area; or an equivalent combination of education and experience sufficient to successfully perform the essential duties of the job such as those listed above.

LICENSING REQUIREMENTS: (position requirements at entry):

- Certification in an appropriate trade as required by position assignment (mechanical, electrical, plumbing, building);
- Valid State of Georgia Driver's License (*as required by position assignment*).

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Inspector

PHYSICAL REQUIREMENTS:

Positions in this class typically require sitting, standing, walking, mobility, lifting, carrying, climbing, bending, crouching, kneeling, crawling, reaching, twisting, grasping, using foot controls, driving, talking, hearing, and seeing. Work in this class also involves working outside and exposure to adverse weather conditions.

Medium Work: Exerting up to 50 pounds of force occasionally, and/or up to 20 pounds of force frequently, and/or up to 10 pounds of force constantly to move objects.

Physical Profile:

This is a Category #2 Physical Profile class and position. All applicants for initial entry by outside hiring into a permanent Fulton County position in this category shall be required to conform to **Part II** of the physical standards and criteria as approved and established by Personnel Board resolution dated November 1, 1988.

Classification History: Draft revised by Fulton County Personnel 7/22/03. JW/TAE/DAG

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Inspector, Senior

CLASS CODE:	EEO CODE:	SALARY RANGE:	FLSA STATUS:	PHYSICAL PROFILE:	TEST CATEGORY:
505124	G	B23	Non-Exempt	#2	B

JOB SUMMARY: Incumbent in this class performs operational duties related to inspecting residential, commercial, and business properties for code compliance. Responsibilities include providing lead direction to assigned staff, inspecting new and existing properties for code compliance, preparing reports, issuing violation notices, and preparing cases for court.

DISTINGUISHING CHARACTERISTICS: This is the second level within a three-level inspector classification series. Inspector, Senior is distinguished from both the Inspections Supervisor and Senior Combination Inspector in that the former inspects new and existing buildings and structures to ensure code compliance and provides lead direction to assigned staff, whereas the latter supervises assigned staff in addition to conducting inspection activities, interpreting codes, and preparing compliance reports.

ESSENTIAL DUTIES: (This list is a representative sample: position assignments may vary.)

- Inspects new and existing properties for compliance with County codes related to building, grading, zoning, and safety laws and issues citations or violation notices for non-compliance;
- Provides lead direction to assigned staff, including establishing workloads, prioritizing work assignments, monitoring employee performance, interpreting policies and procedures, and resolving staff issues;
- Interprets County codes for businesses, homeowners, builders, developers, and other interested parties;
- Maintains inspection files and logs and prepares inspection reports;
- Compiles information to prepare cases for court action and testifies as an expert witness in non-compliance cases as required;
- Conducts inspection for special rehabilitation or renovation projects;
- Determines the extent of renovation projects, including material and labor costs and monitors projects in progress;
- Responds to questions or concerns raised by homeowners, landowners, business owners, or other residents related to code violations;
- Investigates complaints, compiles information, and recommends courses of action;
- Audits permit, license, and business records to determine code compliance and initiates corrective action to bring violating entities into compliance;

Planning & Community Services Assignment

- Planning and Community Services staff to perform duties as listed above with a minimum of two (2) or more trades or fields (electrical, building, plumbing mechanical, erosion and sedimentation control and public infrastructure) codes.

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Inspector, Senior

KNOWLEDGE: (position requirements at entry):

Knowledge of:

- Principles and practices of supervision;
- Laws, rules, and regulations governing inspection activities;
- Techniques used for conducting mechanical, electrical, plumbing, business, building, construction, erosion, sedimentation control, and public infrastructure inspections;
- Inspection tools and equipment;
- Codes related to building, grading, zoning, and safety issues;
- Occupational hazards and safety regulations related to the inspections industry;
- Personal computers and related software.

SKILLS: (position requirements at entry):

Skills in:

- Providing lead direction to assigned staff;
- Organizing and prioritizing work;
- Conducting mechanical, plumbing, electrical, business, building, construction, erosion, sedimentation control, and/or public infrastructure inspections;
- Using inspection tools and equipment;
- Preparing and presenting narrative reports of inspection activities;
- Operating personal computers, including word processing and other related software;
- Establishing and maintaining effective working relationships with other County personnel, officials, and the general public;
- Communication and interpersonal techniques as applied to interaction with coworkers, supervisor, the general public, etc., sufficient to exchange or convey information and to receive work direction.

EXPERIENCE AND TRAINING: (position requirements at entry):

Completion of course work equivalent to the academic requirements of a High School diploma or G.E.D. equivalent; and four (4) years journeyman level experience working in a building trade or a related area (*one (1) year lead experience is preferred*); or an equivalent combination of education and experience sufficient to successfully perform the essential duties of the job such as those listed above.

LICENSING REQUIREMENTS: (position requirements at entry):

- Certification and/or licensing in an appropriate trade as required by position assignment (mechanical, electrical, plumbing, building, erosion, sedimentation control, public infrastructure);
- Valid State of Georgia Driver's License (*as required by position assignment*).

FULTON COUNTY, GEORGIA

CLASS SPECIFICATION

CLASS TITLE: Inspector, Senior

PHYSICAL REQUIREMENTS:

Positions in this class typically require sitting, standing, walking, mobility, lifting, carrying, climbing, bending, crouching, kneeling, crawling, reaching, twisting, grasping, using foot controls, driving, talking, hearing, and seeing. Work in this class also involves working outside and exposure to adverse weather conditions.

Medium Work: Exerting up to 50 pounds of force occasionally, and/or up to 20 pounds of force frequently, and/or up to 10 pounds of force constantly to move objects.

Physical Profile:

This is a Category #2 Physical Profile class and position. All applicants for initial entry by outside hiring into a permanent Fulton County position in this category shall be required to conform to **Part II** of the physical standards and criteria as approved and established by Personnel Board resolution dated November 1, 1988.

Classification History: Draft revised by Fulton County Personnel 10/02/14. JH

CDBG, HOME and NSP Team Meeting

1:00 p.m., May 7, 2018 ROUND UP

*Attendees: Dawn Butler, Jenise Jefferson, Habib Mbye, Art Christian, Kim Benjamin, Ernest Mincey, Julissa Headspeth, DaTanya Lewis, Shon Walker

	Discussion Task	Who	Update/Concern/Resolution
I.	Weekly Reports	Dawn	Weekly reports are still mandatory
II.	HOME		Dawn: Still not certain in which direction we are in terms of hiring to fill Lolita's previous position. Looking into what will fit best.
	a. Update and concerns		
III.	NSP		We have hired an NSP consultant for a minimum of 16hrs. The consultant(s) will work (train) with staff, look into DRGR, and provide a work plan. Training will be mandatory for all and optional for Ernest Mincey and Julissa Headspeth.
IV.	CDBG	Jenise	
	a. 2017 Update and concerns		
	i. Public Service Contracts		
	ii. Municipality Contracts	Habib/Kim	Habib: Forthcoming Invoices & Reports Habib is writing contract recommendations for our Palmetto project. 1.4M is requested as an urgent need. Looking to move transferrable funds from CDBG
	b. Timelines Projects		
	c. 2018		
V.	Rehab	Shon	No more letters are to be sent out. As of right now we are only going to work with the existing projects. All application and requests have been suspended until further notice.
	a. HSG that are ready for contractor release		
	b. HSG that will be ready for contract release		
	i. Week of May 14		See Above
	ii. Week of May 21		See Above
	iii. Week of May 28		See Above
	iv. Week of June 4		See Above
VI.	Contractors	Shon	
	a. Number on list		
	b. Advertisement and future workshop		*Revisit for a later date to late October, early November
VII.	Lead		Lock has been requested
	a. Lead Machine update		Machine is located at 137 in Mia Redd's office
	b. Fulton County's FIRM status		Has been submitted
VIII.	Environmental	Ernest	Environmental processes are moving forward without issues and concerns at this time
	a. Update and concerns		
IX.	Recognized Employee	Dawn	Dawn recognized Habib Mbye as the employee who has gone above and beyond and he will receive a \$10 gift cert to chick-fil-a.



Department of Community Development Time Allocation Form

Time Frame

8:30 - 11:00	2:30
11:00 - 12:00	1:00
12:00 - 12:30	0:30
12:30 - 3:00	2:30
3:00 - 5:00	2:00
Total Hours	8:00

Employee Name: _____ Employee ID: _____
Staff Name: 12345

Payroll Period Beginning: 5/31/2017
Payroll Period Ending: 6/13/2017

lunch is unpaid time which should be reflected accurately in Kronos for a total of 30 minutes

Fund XXX	Unit	6/6/2017							6/13/2017					
		WED	THUR	FRI	MON	TUES	WED	THUR	FRI	MON	TUES	Week 1 Total Hours	Week 2 Total Hours	Grand Total Payroll Hours
Hours Worked														
LABOR DISTRIBUTION - Calculates Automatically DO NOT is this section														
		0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00
Total Hours		0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00

Grant Fund XXX	Unit	6/6/2017							6/13/2017					
		WED	THUR	FRI	MON	TUES	WED	THUR	FRI	MON	TUES	Week 1 Total Hours	Week 2 Total Hours	Grand Total Payroll Hours
Hours Worked - Administrative														
LABOR DISTRIBUTION - Calculates Automatically DO NOT is this section														
		0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00
Total Hours		0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00
Grand Total Hours		0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00

For Finance tracking purposes only

Category	Date	Hours	Date	Hours
Vacation				
Sick Leave				
FMLA				
Holiday				
Other				

Division Manager _____

Staff Signature _____

Program Manager _____

Site Manager / Coordinator _____

INTEROFFICE MEMORANDUM



TO: Frankie L. Atwater, Sr., Director
Department of Community Development

FROM: Anthony Nicks, County Auditor *Anthony Nicks*

SUBJECT: Auditor's Comments to the HOME Program Monitoring
Audit (Q3 & Q4 of 2016) Department Response

DATE: May 25, 2018

The Office of the County Auditor has reviewed the department response for HOME Program Monitoring Audit (Q3 & Q4 of 2016) submitted to our office on May 18, 2018. We appreciate your responses and understand your right to respond as you deem necessary. However, in your response, there were several findings in which you expressed your disagreement that we feel requires further clarification in order to validate and substantiate the respective findings. Our comments and explanations are detailed below:

Finding 1 – Ineffective Management of Staff

To provide clarification, this is a finding. Although the examples mentioned were referred to as a concern, proper due diligence was conducted to substantiate those concerns that collectively rose to the level of a finding. Our conclusion was supported by interviews of several key HOME Program staff and/or through audit observations. Furthermore, it is important to note that some of these concerns were also reported during prior audits. The concern related to clearly defining lines of authority was revealed in interviews and during our review of the departmental organizational chart. Additionally, we would like to point out that the departmental organizational chart attached to the response as Exhibit I was not the organizational chart that was provided during the audit. It also appears that the lines of authority differ significantly. As it relates to how staff felt about the lack of communication and being isolated, these were issues that seemed to be consistently brought to our attention during our interviews.

Finding 2 – Lack of Reorganization Plan

Based on our assessment of organizational changes that have occurred in the department a written reorganizational plan is imperative. The absence of an approved written plan does not provide proper transparency and assurance that modifications were adequate and adhere to County policies. Furthermore, it appears that this is contrary to your previously stated position regarding the process of restructuring. Reflected below is an excerpt from the corrective action

plan your department submitted during the follow-up review for the HOME Program Grant Infrastructure Audit:

"The Director has obtained approval to reorganize the department to best meet operational needs. The goal for completion is May/June of 2016."

"The department is under new leadership and is in the process of reorganizing. As such, all positions are being re-evaluated and responsibilities reallocated to ensure the most critical areas have designated oversight."

Furthermore, as a result of the HOME Program Monitoring Audit issued on June 23, 2016 your response included the following statement:

"The department is also working on a restructure plan moving toward a more functional organizational structure that facilitates timely decisions, more strategic use of resources, heightens accountability and more closely monitors the administration of all programs. The new structure will aid in the reduction of gaps in functional and organizational performance which will increase overall effectiveness and efficiency by the department. If approved by the Board and as allowed by the budget, our goal is to phase implementation of the restructure beginning October 2016."

To address certain findings, the following response was also provided:

"Under new leadership, in January 2016 the FCHCD began Phase I (analysis/assessment) of a departmental restructure with a focus on first adding positions, where allowed through the budgetary process, to fill critical operational gaps."

"Moving toward the strategy formulation stage of the restructure, the department is formulating a plan for the County Managers approval. This plan will identify key positions and critical elements within the department that will address operational deficiencies and lead our efforts in effectively administering our housing programs funded by HUD."

During the current audit meetings with management, it was indicated that the restructuring was still in process. At that point, we made several requests to obtain the departmental restructuring plan submitted to the County Manager for approval along with documentation used to conduct staff assessments and communicate organizational changes to staff. Initially we were told that the documents would be provided to us, however, after several requests, no approved or unapproved plan was provided. We received the following email from the Deputy Director as rationale for not having a plan:

“Please note that the department did not submit a written reorganization plan to the County Manager for approval. Instead, weekly conversations by the Director continue to be had with the County Manager in regard to past audit findings, employee concerns and critical operational gaps. As such, the County Manager offered the Director full consent to make the assessments and operational changes as deemed necessary to increase efficiency. We took the approach to focus on the positives and how we could build on each employee's unique strengths. In this regard, identifying employees' strengths and weaknesses was the first step. In some cases we revised job descriptions, added or changed responsibilities, and streamlined processes in order to place employees in positions where they can succeed and use their skills. Likewise and in concert with historical audit recommendations we hired a Financial Systems Manager to help strengthen internal controls and properly segregate financial duties. This is an ongoing effort, however, and will remain fluid so as to always best align with both departmental and County direction.”

However, this explanation does not preclude the department from failing to develop a sufficient plan and maintaining documentation that details their efforts thus far.

Finding 4 – Departure from Established Draw Process

As a result of the 2008 OIG Audit, HUD required internal audit to conduct routine monitoring audits. As such, our main objective is to assess the effectiveness of procedures and controls implemented since the 2008 OIG Audit. Since 2008 we have consistently had findings related to the draw process. It is important to ensure compliance with all established policies and procedures regardless of whether externally mandated or internally implemented. If at any time a process no longer exists or is required, changes to the written procedures should be made accordingly. Additionally, in the event errors are not caught with several layers of review, this is a clear indication of the need for training or additional layers of review. The AMS/ IDIS reconciliation is currently not conducted as needed and is not considered an adequate control that is sufficient to serve as an alternative for adequately reviewing draw requests. Furthermore, we believe centralizing the task to one staff person within the department further decreases the controls over the draw process.

Finding 6 – Lag in Completion of AMS & IDIS Reconciliation

The department is responsible for ensuring that obligations, expenditures, and program income submitted to HUD in the Consolidated Performance and Evaluation Report (CAPER), or other applicable report(s), reconcile with the County's accounting records. This issue was initially reported as a result of the HOME Program Grant Infrastructure Audit. The Corrective Action Plan and Current Status submitted by your department during the follow-up review indicated the following:

"Draw procedures have been established and implemented. Several meetings occurred to meet this requirement and will continue to improve efficiencies as HUD continues to refine IDIS. Staff has reconciled to \$17k and is now working with Finance to identify the remaining dollars by 3/31/2016. Effective March 2016, the Department now has scheduled monthly meetings with the Accounts Payable and Purchasing staff to review budgets, discuss pending draws and address any gaps in operational delivery. The CD Manager-Fiscal was hired in January 2016. Finance now emails copies of the draw reports to HCD finance staff and program manager. The Department Director is meeting regularly with Finance to determine gaps and strategies to best mitigate them. The Departmental staff is meeting monthly to go over budgets for each program area. Program Managers now have responsibility for IDIS data entry and the fiscal staff has the responsibility for bi-weekly reconciliations and reporting to upper management. Staff began working with HUD Financial staff to verify the amounts in IDIS Reports for reconciliations. Procedures are being drafted to ensure regular and consistent reconciliations internally and against HUD reports. A CD Manager-Fiscal was hired in January 2016. An additional CD Specialist-Fiscal is needed to perform other fiscal duties in the department."

During our audit, we noted that the actions in red have yet to be completed or fully implemented.

Finding 7 – Incompliance with Administrative Cost Principles

Your response to Finding 7 included Exhibit III, which is a blank document that you submitted as evidence of compliance with administrative cost principles. During the audit, we requested actual documentation of your compliance, however, we were not provided with the documentation. We further discussed this issue in the exit conference and extended additional time for you to provide actual documentation related to our audit period. In spite of allowing the additional time, the documentation was not made available. Since that time, numerous additional requests have been made for the documentation, to no avail.

Finding 10 –Delay in Submitting CAPER to HUD

While we understand HUD provided the County with an extension, it is important to ensure we take necessary efforts to adhere to federal reporting deadlines. Furthermore, the basis for requesting an extension due to an employee's departure further lends to the reason why it is not a good practice to centralize tasks to one staff person in the department.

We look forward to working with you to resolve this and any other issues regarding our report. If you have any questions or need additional information pertaining to this matter, please contact me at extension 21019. Thank you.

Cc: Richard "Dick" Anderson, County Manager
Anna Roach, Chief Strategy Officer

