

**Justification – Office of Community Planning and Development
Houston, Texas
February 2006**

The decision to establish a CPD full service office in Houston, Texas is based on a number of considerations, including the increase of population in the city and surrounding areas that receive assistance from HUD, and its proximity to the Gulf Coast. Currently, the Office of CPD in Fort Worth, Texas manages the existing four out-stationed staff members and functions remotely.

Current Staffing:

Current staff includes two Program Advisors (one GS-14 and one GS-13), one CPD Representative (GS-12), and one Program Assistant (GS-7). All four staff members are managed out of CPD's Fort Worth, Texas Office (see organizational chart). CPD requires that each field office have sufficient staff and expertise to cover four core functions. These four functions are Supervision, Grants Management, Financial Management and Support. Sufficient staff to cover these functions enables an office to exercise delegations of authority, manage financial systems (LOCCS, IDIS), provide general assistance to grantees, monitor and oversee the various business processes in the Grants Management Process (GMP) system. At their current staffing levels and with the skills represented, the Houston CPD staff does not have the capacity to function as a full service CPD program office. At least three of the four functional areas are not adequately covered, including Supervision.

The remote management of such a team is not only difficult, but in this case, an added burden to the Fort Worth CPD Program Office with the increased responsibility of assisting the Katrina hurricane relief effort along the Gulf Coast. Once fully staffed the Houston office will be capable of functioning independently of the Fort Worth CPD program office, except for technical skills such as environment and Relocation Uniform Act assistance. The CPD Ft. Worth Program Office handles the latter two functions. This is consistent with situations around the country where many field CPD field offices share skills with their regional offices.

The decision to position a full service staff in Houston will enhance customer service to previously underserved areas immediately around Houston. Providing the office with the full complement of program delegations of authority will further increase its ability to deliver those services in a timely and responsive manner. It will also delayer the organizational structure and increase accountability to Headquarters by removing the additional Fort Worth layer of program and staff management.

Current Workload:

The Houston CPD program management team oversees programs in four urban counties and 14 cities that administer CDBG, HOME, ESG and HOPWA funds. In addition to the formula grantees, the existing staff also manages competitive grants including Continuum of Care, Economic Development Initiative grants (EDI), Brownfield Economic Development Initiative grants (BEDI), HOPWA competitive, Section 8 SRO, Rural Housing and Economic Development, Youthbuild, Section 108 loans, and Technical Assistance grants scattered throughout their geographic area.

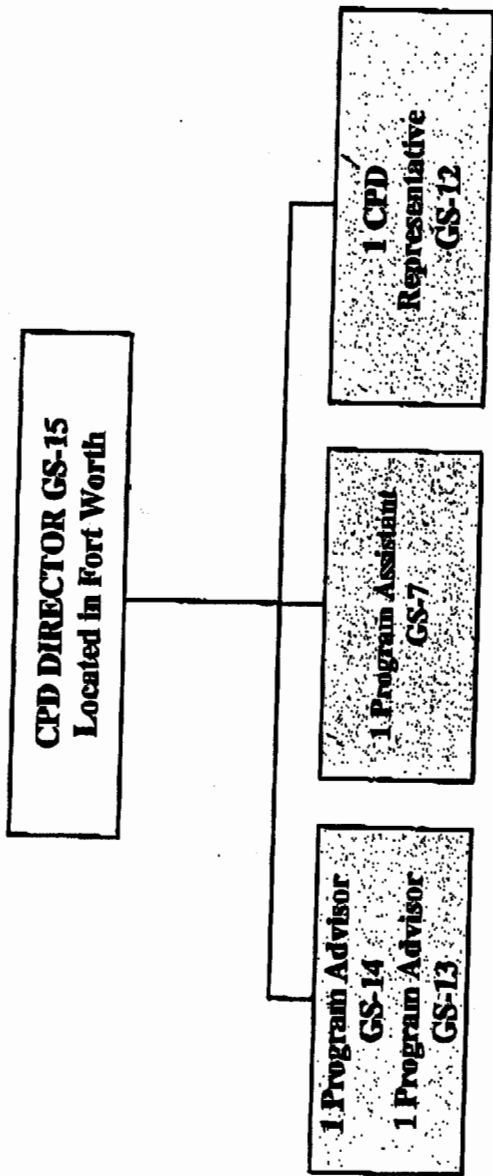
Recommended Staffing

The Houston workload is comparable to several other full service offices such as Birmingham, San Antonio, and Columbia. In addition to the formula grantees, the team manages smaller competitive grantees primarily Continuums of Care, scattered throughout their designated geographic area. Based on these factors, as noted on Attachments C and F, a staffing level of nine FTE is recommended.

Cost Analysis

The full service Houston CPD Office will require five additional staff: (one CPD Director, GS-14; one Financial Analyst, GS-12/13; one CPD Representative, GS-12; and two CPD Representatives, GS-9/11/12.) The added staff will require additional office space and office furniture. The Director will require an enclosed office. Travel costs would remain similar to what is already allotted to Fort Worth for the Houston geographic area. An additional minimal amount of file space will be required for the workload that will be administered by the future office staff. The staff will require access to a GSA vehicle for local travel within its geographic area.

HOUSTON FIELD OFFICE-CPD (Current)

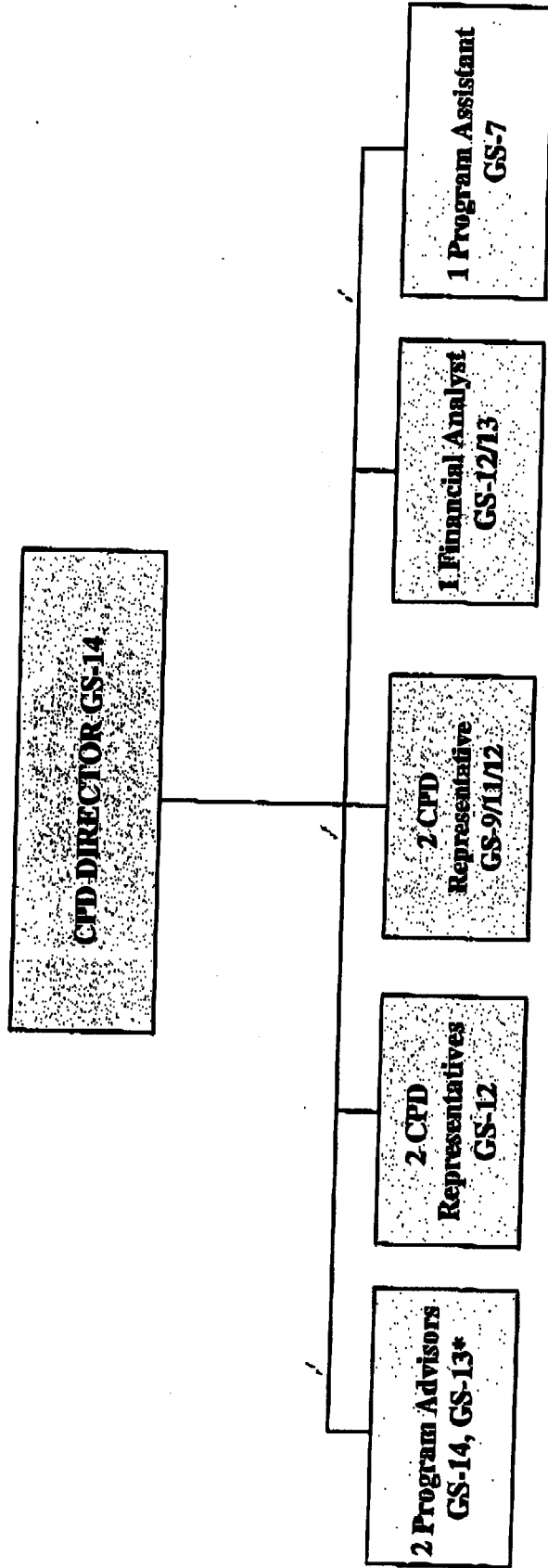


Fl. Worth CPD

Outstationed Houston Total FTE: 4

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□

HOUSTON FIELD OFFICE-CPD (Proposed)



Houston Field Office Total FTE: 9

* Incumbency only

CPD Staffing Plan - Houston

The staffing plan for the newly established CPD Office in Houston, Texas, is as follows:

| <u>Position</u> | <u>Grade</u> | <u>Number</u> |
|--------------------------------|--------------|---------------|
| Director (vacant) | GS-14 | 1 |
| Program Advisor | GS-14 | 1* |
| Program Advisor | GS-13 | 1* |
| CPD Representative (1 vacancy) | GS-12 | 2* |
| Financial Analyst (vacant) | GS-12/13 | 1* |
| CPD Representative (vacant) | GS-9/11/12 | 2* |
| Program Assistant | GS-7 | 1* |

Total FTE.....9

Vacancies in the Houston office will be staffed through merit staffing and reassignment.

*bargaining unit

CPD - Houston Employee From - To List

Attachment D

| NAME | CURRENT POSITION | CURRENT LOCATION | NEW POSITION | NEW LOCATION | COMMENTS |
|-----------------|----------------------------------|--------------------------------------|------------------------------------|--------------|--------------------------------------|
| Vacant | | | Director, GS-301-14 | Houston | Recruitment required |
| Henry Hadnot | CPD Program Advisor, GS-301-14 | Houston (outsitoned from Fort Worth) | Same | Houston | Position occupied as incumbency only |
| Eddie Violette | CPD Program Advisor, GS-301-13 | Houston (outsitoned from Fort Worth) | Same | Houston | Position occupied as incumbency only |
| Vacant | | | Financial Analyst, GS-1160-12/13 | Houston | Recruitment required |
| Johnnie Charles | CPD Representative, GS-301-12 | Houston (outsitoned from Fort Worth) | Same | Houston | |
| Vacant | | | CPD Representative, GS-301-12 | Houston | Recruitment required |
| Vacancies (two) | | | CPD Representative, GS-301-9/11/12 | Houston | Recruitment required |
| Debbie Reynolds | CPD Program Assistant, GS-303-07 | Houston (outsitoned from Fort Worth) | Same | Houston | |

Functional Statement for the CPD Houston Office

The Houston CPD Office will be responsible for the administration and management of all Community Planning and Development programs within the geographic jurisdiction of the office. CPD programs under the office's jurisdiction will include: four entitlement programs – Community Development Block Grants, Home Investment Partnerships Program (HOME), Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOWPA-Formula), and nine competitive programs – Section 108, Supportive Housing Programs (SHP), Shelter Plus Care (S+C) programs, Housing Opportunities for Persons with AIDS-Competitive, Economic Development Initiative (EDI), Brownfield Economic Development Initiative (BEDI), Rural Housing and Economic Development (RHED), Youthbuild, and Empowerment Zone programs. Program management and oversight will be performed in conformance with established policies, procedures, and standards, which are directed towards encouraging well-planned integrated neighborhoods and communities through improved community planning, management and development processes at the local levels. The Houston Office will also be responsible for the development of the annual Management Plan as well as the implementation of activities in support of the Presidential and Secretarial initiatives.

The Houston CPD Office will administer and manage community planning and development activities, ensure that communities under the jurisdiction of the office receive essential CPD field services, and assist communities and public agencies engaged in CPD programs in carrying out program and contractual requirements in a timely and efficient manner. In addition, the Houston Office will be responsible for consistent overview and control of programs toward meeting CPD program goals and objectives as established by Headquarters and Regional Offices. This will include ensuring that CPD funded activities are in compliance with Lead Based Paint, Fair Housing, Relocation and Davis-Bacon requirements. The office will also have the responsibility to assure that all necessary statutory and technical determinations are made in connections with approved program requirements. The office will act as the primary liaison and coordinate with other program divisions at the Regional/Field Office level and with Headquarters staff to ensure that CPD program needs and concerns are adequately considered, and to make recommendations to the Regional/Field Office Director and other officials as to how the needs and concerns of CPD programs can be met.

As a result of recent natural disasters such as hurricanes Katrina and Rita, the Houston area has experienced an increased number of low and moderate-income residents. This new population generally relies upon the services offered by HUD's Office of Community Planning and Development. These services consist of activities related to community and economic development as well as affordable housing. The anticipated increase in the demand for CPD services will require additional staff to

provide adequate management oversight, customer service, and technical assistance to HUD's clients.

Proposed CDBG Entitlement grantees that would be transferred to the Houston Office:

- | | | | |
|-----|-----------------|-----|---------------------|
| 1. | Baytown | 11. | Pasadena |
| 2. | Beaumont | 12. | Port Arthur |
| 3. | Bryan | 13. | Sugar Land |
| 4. | College Station | 14. | Texas City |
| 5. | Conroe | 15. | Brazoria County |
| 6. | Galveston | 16. | Fort Bend County |
| 7. | Houston | 17. | Harris County |
| 8. | League City | 18. | Montgomery County |
| 9. | Missouri City | 19. | Washington County - |
| 10. | Orange | | (Home Consortium) |

Note: Of the above total, 13 are HOME Participating Jurisdictions grantees.

Proposed Competitive programs that would be transferred to the Houston Office:

46 Homeless grantees

1 EDI grantee

2 Rural Housing and Economic Development grantees

3 Youthbuild grantees