



COMMONWEALTH OF KENTUCKY IMPLEMENTATION PLAN FOR DISASTER RECOVERY







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# 1. Introduction

The Commonwealth of Kentucky is the recipient of \$74,953,000 for 2021 Disasters in Community Development Block Grant – Disaster Recovery (CDBG-DR) funds. The CDBG-DR funds will be used for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most impacted and distressed" (MID) areas resulting from the 2021 storm events.

The Federal Register Notice (87 FR 31636) that allocates CDBG-DR funds requires the Commonwealth to demonstrate through their implementation plan that it has sufficient capacity to manage the CDBG-DR funds and the associated risks. This implementation plan will describe the Commonwealth's capacity to carry out the recovery and how it will address any capacity gaps.

# 1.1. Lead Agency for the CDBG-DR award

The Kentucky Department for Local Government (DLG), under the Office of the Governor, provides financial assistance through grants and loans and advises local governments in matters of budget, personnel, and other issues relevant to those entities. DLG will be the lead agency that manages and disburses the \$74,953,000 in CDBG-DR funding.

- Dennis Keene serves as the Commissioner of the Kentucky Department for Local Government and reports to Andy Beshear, Governor of the Commonwealth of Kentucky.
- Billie R. Johnson serves as the Executive Director for the Office of Federal and State Grants and reports directly to the Commissioner.

# 1.2. Federal and State Funding Sources Managed by Kentucky DLG

The Commonwealth manages several federal and state grants. The following are all the federal grants that the Kentucky Department for Local Government manages:

- Appalachian Regional Commission (ARC): a federal-state economic development program designed to assist in the economic development of Appalachia through a diversity of projects in the areas of public infrastructure, human resource development, and business/entrepreneurial development. The ARC grant program provides the region with financial assistance in creating jobs, developing a workforce, and providing health care and education services.
- <u>Delta Regional Authority (DRA)</u>: a federal-state economic development grant program
  used to help economically distressed communities leverage other federal, state, and
  local dollars for community development projects that focus on infrastructure
  development, business development/entrepreneurship and job training services.
  Funding is restricted to areas in western Kentucky.
- <u>Land & Water Conservation Fund (LWCF)</u>: the program provides <u>federal grant funds</u> to protect important natural areas, acquire land for outdoor recreation and to develop or renovate public outdoor recreation facilities such as campgrounds, picnic areas, sports & playfields, swimming facilities, boating facilities, fishing facilities, trails, natural areas, and passive parks.





- <u>Recreational Trails Program (RTP)</u>: the program is funded by the Federal Highway Administration (FHWA) and aids with acquisition of easements, development and/or maintenance of recreational trails and trailhead facilities for both motorized and nonmotorized use. The Recreational Trails Program benefits communities and enhances quality of life.
- <u>Neighborhood Stabilization Program (NSP)</u>: grant program to stabilize communities that suffered from foreclosure and abandonment. The program aids cities, counties, and housing non-profit organizations to acquire and redevelop foreclosed properties that might otherwise become sources of blight within their communities. A total of \$37.4 million is available to Kentucky.
- Recovery Housing Program (RHP): provides funding to support individuals in recovery
  from substance use disorder (SUD) and help them reach self-sufficiency by providing
  stable, temporary housing. RHP funds may be used to develop or maintain housing
  for individuals in recovery from SUD. Assistance for individuals is limited to the earlier
  of two years (cumulative) or until they secure permanent housing.
- <u>Community Development Block Grant (CDBG)</u>: designed to provide funds for community development projects that address human service needs, such as senior centers, crisis centers, fire stations and facilities that provide services to low-income persons.
- Community Development Block Grant Coronavirus (CDBG-CV): originated from the CARES Act of 2020, enacted to provide relief in response to the COVID-19 pandemic. An allocation was made to states to "prevent, prepare for, and respond to" COVID-19 through funding from the Department of Housing and Urban Development (HUD).

The following are all the state grant programs that the Kentucky Department for Local Government manages:

- <u>Joint Funding Administration (JFA)</u>: The Kentucky General Assembly allocates a set amount of money every biennium from the General Fund to the JFA, to be distributed by DLG. Similarly, from a federal point of view, the participating agencies (i.e., EDA, CDBG, etc.) allocate a set amount of money every year from their general funds to Kentucky, to be distributed by DLG via the JFA.
- Flood Control Local Match Program: administered by the Department for Local Government, Office of State Grants, the program uses state bond funds as grants to assist local communities in meeting cost-share match requirements associated with projects funded by federal agencies.
- <u>Special Programs Branch</u>: administers grant and loan programs to city and county governments, special purpose governmental entities, and Kentucky's 15 Area Development Districts (ADDs) to promote community and economic development across the Commonwealth.
- <u>Coal Development Branch</u>: utilizes state funds to promote economic development across the Commonwealth.





# 2. Capacity Assessment

# 2.1. Assessment of DLG's capacity

The Commonwealth of Kentucky will implement the CDBG-DR funds through its existing network of certified local CDBG administrators. While many daily functions will be completed at the local level, DLG will provide oversight of the State's program design and delivery and ensure through, training, technical assistance, and compliance monitoring that the local partners are in compliance with the program requirements.

To understand DLG's capacity needs, the agency assessed existing staff and their experience with HUD grants, required grant functions, and identified gaps. There are a total of 48 positions in the DLG organizational chart, with 3 vacant positions that need to be filled. For CDBG-DR, there are ten staff members who will be implementing and/or providing oversight of the grant. Currently, Kentucky DLG is in the process of filling one vacancy for State grant and preparing to advertise for a position in Federal grants.

DLG staff capacity will be augmented by ICF not only through the action plan phase but throughout program implementation. ICF meets weekly with DLG leadership and team members and will be working side by side with state and local staff to ensure adequate capacity and technical expertise.

# 2.1.1. CDBG-DR Grant Program Functions

Grants Management: A total of seven staff (~2.3 FTEs) will be monitoring the grant to ensure that programs are meeting their national objectives, reaching milestones for progress and timely spending, and reporting to HUD.

Policy & Planning: Five staff (~1.4 FTEs) will manage the updating of the Action Plan and responding to HUD requests. DLG will make use of the disaster recovery consultant for things involving policy interpretations, drafting waiver requests, maintaining policies and procedures, and providing expertise to staff.

Financial Management & Planning: Three staff members (~.64 FTEs) will be responsible for tracking program expenditures and processing DRGR drawdowns.

Procurement & Contract Management: Four (~1.22 FTEs) CDBG-DR staff will work with the inhouse contracts team lead on all procurement needed for the CDBG-DR program. Three staff members will be working with local government subcontract management while another staff member will be performing legal review of all contracts.

Data Systems & Reporting: Four staff members (~.97 FTEs) will manage internal accounting systems and the Disaster Recovery Grant Reporting (DRGR) system. Staff will also manage the posting of materials to the CDBG-DR website such as the quarterly performance reports, contracts, and the Action Plan.





Training: Kentucky DLG has procured a disaster recovery consultant that will assist with providing training on various grant programs which include CDBG, CDBG-DR, NSP, and RHP. See section 2.1.2.

Compliance & Monitoring: Kentucky DLG has an advisor who will be responsible for the project oversight. Three staff members (~.64FTEs) will be responsible for supporting DLG Compliance.

Human Resources: The Kentucky DLG has a Human Resources Division, under the Office of Financial Management and Administration. CDBG-DR staff will utilize existing function when needed to recruit or hire new staff to the team.

Communications & Outreach: An executive assistant (~.72 FTEs) will be fulfilling the role of Information Officer, writing press releases, and assisting with the website.

Program Operations: Three staff members (~1.8 FTEs) will be responsible for overseeing the housing, economic, and infrastructure CDBG-DR programs. The work will include developing the program guidelines, implementing the application process, submitting reports to HUD, and closeout. When required, the disaster recovery consultant will provide additional support to DLG to manage these programs. DLG will implement the CDBG-DR funding through its network of local certified CDBG administrators.

# 2.1.2. Systems in Place to Facilitate Grant Management

#### Housing and Development Software's (HDS) Funds Management System

The HDS Funds Management System is designed to handle all funding sources received and allocated by an agency. Funds are allocated by the U.S. Department of Housing and Urban Development (HUD) such as CDBG, CDBG-DR, HOME, ESG, and HOPWA. The HDS Funds Management System was created with the ability to combine and manage various funding sources to the state.

CDBG-DR staff can use the system to do the following activities:

- Collect all specific reporting requirements and process voucher reimbursements that can be transmitted into HUD's Disaster Recovery Grant Reporting (DRGR) system.
- Manual voucher creation use HDS to interlink with eMARS.
- Tracks disbursements by vendor and contract.
- Track program recipients, projects, activities, and program budgets.
- Monitor grant and program details frequently and report grant progress.
- Track the allocation of funds to sub-grantees and their disbursements of those grant funds.

#### Management, Administrative, & Reporting System (eMARS)

eMARS is Kentucky's main financial system for managing the chart of accounts, placing orders for, and recording the receipt of goods or services, and receipting funds. The system is built to maintain data integrity to provide a high degree of accountability and confidence within the system





without making it impossible for staff to use or perform necessary actions within the scope of their job functions. Below is the main function of the system:

- Chart of Accounts: eMARS provides the organizational hierarchy needed for accounting and budget reporting for a centralized or decentralized model and can be used to classify accounting information across the Commonwealth. All central COA elements are maintained by the Division of Statewide Accounting Services, OOC or the Office of State Budget Director (OSBD).
- Fund Accounting: eMARS can track and manage funds and general ledger-based accounting activity across the Commonwealth. It is the basis of our Financial Statements.
- Cost Accounting: eMARS can track accounting activity associated with special purposes such as grants and projects to identify grants or federally funded projects.
- Procurement: eMARS contains several features that provide staff with the ability to request goods and services along with other procurement activities.
- Cash Receipt Processing: eMARS allows staff to process cash receipts, vendor refunds, recognize revenue from sales, recognize a deferred revenue liability, and repay loans on assets.
- Reporting: in coordination with the Enterprise Business Intelligence (EBI), eMARS can
  export customizable reports to summarize accounting activity.

# 2.1.3. Disaster Recovery Consultant

To establish a higher level of CDBG capacity in local communities, DLG over 20 years ago hired ICF to develop and program handbook that covered all aspects of the CDBG State program. To be eligible to apply for CBDG funds, local cities and counties must have a program administrator that has completed the CBDG training and passed the certification test. This program also requires certified administrators to continue to participate in advanced training to maintain their certification. Through this long-term commitment to set a standard of programmatic knowledge and capacity at the local level, DLG has created and maintained a capable network of local administrator who will be implementing the CDBG-DR funds. Through the continued partnership with ICF, DLG continues to provide guidance to local governments on the use of Community Development Block Grant (CDBG) funding. With the occurrence of multiple disasters in recent years, the Commonwealth of Kentucky procured expanded technical assistance to provide additional consultation and implementation assistance. ICF provides extensive CDBG-DR experience and will expand the CDBG training and guidance to ensure that the Commonwealth implemented programs in compliance with the CDBG-DR regulations. The ICF team is working with DLG staff to expand the existing Kentucky CDBG Handbook to also include the CDBG-DR requirements and DLG's implementation process. Additionally, CDBG-DR specific training will be required for recipients.

Regarding managing federal funds, the challenge of building and maintaining capacity at the state and local level is an ongoing task which continues to be critical in a period where there is higher turnover of local staff. Through this existing contract, the consultant will also provide support in helping the Commonwealth develop the Action Plan, implementing the CDBG-DR programs,





provide interpretation of regulations in the Consolidated Notice, and provide best practices from other state programs. If needed, the consultant may bring on additional support staff to help the Commonwealth with various assignments and completion of deliverables for HUD.

# 2.2. Assessment of Subrecipient capacity

Implementation of federal programs are only as successful as the capacity of the grantees and other subrecipients that carry them out. With the support of the disaster recovery consultant, DLG will provide ongoing technical assistance and training to all grantees and requires UGLGs to hire a certified administrator to assist in the administration of the awarded grant for the project. DLG has also published the Handbook for Kentucky CDBG Grantee, a comprehensive grants manual, which has been adapted to include a section on CDBG-DR requirements.

As part of the application process, DLG will evaluate applicants based on their ability to carry out projects. Applicants that need additional support will work with DLG to find solutions so that projects can be implemented successfully. DLG will also monitor frequently to ensure compliance and look for opportunities to create capacity at the local level.

# 2.3. Resolution of CDBG-DR findings

There are no open findings for CDBG-DR grant funding as it relates to Kentucky.

The last federal audit performed on DLG was by the Office of Inspector General for the Neighborhood Stabilization Program in December 2017. This finding has been addressed and DLG has updated its records retention policy to meet HUD's records retention requirements and developed a retention strategy for its subrecipients to ensure that documentation is readily available for review. DLG has had an OIG visit and has complied with requests from HUD.

# 2.4. Addressing identified capacity gaps

The Kentucky DLG is in the process of filling one vacancy for State grant and preparing to advertise for a position in Fed grants to meet the demands of implementing the CDBG-DR grant funding. The department will do a regular assessment of its own capacity and the staff capacity for the Area Development Districts (ADDs). Based on the results of the assessment, DLG will determine what level of staffing support is needed and may rely on the resources and expertise the disaster recovery consultant can provide at both the state and local level. DLG offers training to grant administrators which has been seen to improve performance after staff have been employed for six months to a year.

# 3. Staffing

# 3.1. Organizational chart of DLG

See Appendix A.





# 3.2. Key Staff

Below are the key staff that will support the implementation of the CDBG-DR grant.

#### Billie R. Johnson, Executive Director

Billie has worked for the Commonwealth of Kentucky for 26 years. She came to the Department for Local Government in September 2012 working as a Local Government Advisor in the office of State grants. In January 2020, Governor Andy Beshear appointed Billie as the Executive Director for the Office of Federal and State Grants, overseeing the CDBG programs. She is a graduate of Morehead State University with a Bachelor's in Sociology/Criminology.

#### Jennifer Peters, Infrastructure Branch Manager

Jennifer joined the state government in 1995 with the Parks Department then work for the Division of Water in the Environment Protection Agency and State Revolving Fund. In 2007, Jennifer came to DLG to work in the Public Facility branch. She is now a Branch Manager, where she reviews and evaluates applications and overseas funded projects for compliance. During her tenure, Ms. Peters has written or assisted with writing many policies and procedures, handbooks etc. She also serves as the environmental officer for HUD programs, works closely with the Fiscal Manager, and budget person in tracking payments, budgets and contracts knows IDIS, DRGR, HDS and eMARS, serves as labor and federal reporting compliance officer. She works closely with DLG's contractor for handbook updates and training. In addition, she, assists with ARC funded projects.

#### Gabe Nickell, Economic Development Branch Manager

Gabe has been employed by the Commonwealth of Kentucky for 20 years and has spent the last 15 years working in the Department for Local Government, after starting his career in the Transportation Cabinet. He has spent his entire DLG tenure working in the Economic Development Branch and has served as Branch Manager for 13 years. He is a graduate of Morehead State University with a degree in Communications

#### Trey C. Greenwell, Economic Development Branch Local Government Advisor

Trey came to work in the Department for Local Government, Economic Development Branch in November of 2021, after previously working for the Commonwealth Office of Technology. He serves as a Local Government Advisor with DLG. While with COT, Trey wrote many of the department's policies and procedures, user manuals, led training sessions for staff, and served as an internal auditor for inventory management and billing records

#### Travis A Weber, Housing and Communities Branch Manager

Travis has been with the Kentucky Department for Local Government, Federal Grants: Housing and Community Projects since April of 2007. Prior to working with the Department for Local Government, Travis worked for the Bluegrass Area Development District assisting local communities with public budgeting, federal grant administration, drafting local policies, and other local government needs. Travis also briefly served as the Manager of Multi-Family Programs at





the Kentucky Housing Corporation, assisting project developers with program compliance, project development, and project administration and underwriting.

#### Cathy Figlestahler, Local Government Advisor

Cathy began working with the Kentucky Department for Local Government, Office of Federal Grants, in April of 1997. She was a Local Government Advisor in the Public Facilities Branch until 2008, when she began working in the Housing and Community Projects Branch. Prior to DLG, Cathy worked as a CDBG grant writer and project administrator at the Bluegrass Area Development District for 18 years.

### Mark Williams, Compliance Branch Manager

Mark is presently a Branch Manager for the Governor's Office for Local Development. He has been with the Department for Local Government (DLG) for 21 years. Prior to this position, he was Director of Community Development in Breathitt County, Kentucky. He also has ten years of international development experience, which includes three years as a Peace Corps Volunteer in Nepal and seven years as a Program Manager for a variety United Nations and U.S. Government community development projects in Nepal and Pakistan. Mark has an M.A. in International and Intercultural Development from The School for International Training in Vermont and a B.A. from Temple University.

#### Cole C Sutton, Compliance Branch Local Government Advisor

Cole has worked for the Commonwealth of Kentucky since October of 2014. He began his career with the State with the Department of Revenue, Legal Enforcement Branch/Division of Collections before coming to the Department for Local Government in 2020. He currently serves as a Local Government Advisor with the Compliance Branch, under the Office of Federal Grants. He is a part of the CDBG-DR team focusing on unmet needs assessment surveys and website implementation.

#### D. Brandon Gibson, Staff Attorney

Brandon has been employed by the Commonwealth of Kentucky since 2020. After working two years with the Department of Public Advocacy, he began working as a Staff Attorney for the Department for Local Government in June 2022. Prior to his work with the Commonwealth, he worked for the State of Tennessee Department of Revenue as a Revenue Collection Manager and has experience in the private practice of law. Brandon earned his JD from Mississippi College, MBA from the University of Kansas, and BS from Northern Kentucky University where he majored in Industrial and Labor Relations.

#### Logan Fogle, Executive Assistant

Logan has been employed with the Department for Local Government as an Executive Assistant since April of 2022. Logan prepares remarks, press releases, manages DLG's social media, and coordinates with local officials regarding projects in their communities for funding announcements. Before working at DLG, Logan worked as a Legislative Assistant at the Louisville Metro Council. He attended Transylvania University and the Patterson School of Diplomacy.





Function	DLG Staff Members		
Program Management	Branch managers for each program area as listed in		
	the organizational chart.		
Case Management	Assigned staff		
Procurement/Contract	Assigned staff		
Management			
Section 3 Compliance	Jennifer Peters and Trey Greenwell		
Fair housing Compliance	Assigned staff		
Environmental Compliance	Jennifer Peters		
Financial Management	Jennifer Peters, Cole Sutton, and Mark Williams		
DOB Analysis	Assigned staff		
Timely Expenditure	Mark Williams and Cole Sutton		
Website Management	Cole Sutton and Logan Fogle		
Monitoring and Compliance	Assigned staff		
Internal Auditor	Assigned staff from Finance and Administration		
	Cabinet, Office of Policy and Audit		

<sup>\*</sup> *Note*: Assigned staff will be a mix of individuals that will vary based on the type of activity and scope of work.

# 3.3. Plan to fill knowledge gaps and build technical expertise

DLG maintains internal policies and procedures that describe the various HUD regulations that must be followed and steps that staff must take to be in compliance with those regulations. The CDBG Handbook will be updated to include CDBG-DR applicable language so new and existing staff can use it as a resource.

Staff and sub recipients are also encouraged to attend online, and in-person workshops or conferences hosted by HUD to build knowledge and capacity to oversee the grant programs.

# 3.4. Technical assistance to subgrantees and subrecipients

DLG maintains a certified administrator program and offers training on the CDBG program as a whole and specific compliance areas on an as needed basis. Each subrecipient is required to obtain a certified administrator to oversee the implementation and compliance of the CDBG-DR funded project. This requirement will be part of what DLG evaluates when applications are submitted for CDBG-DR funding. Understanding that for many UGLG's the burden of administering a CDBG-DR grant might be too much for existing staff, DLG plans to award administration funds in the form of project delivery funds for them to hire qualified grant administrators.

DLG will also hold zoom or in-person meetings to provide technical guidance on the CDBG-DR program prior to application submittal and again prior to implementation. ICF will continue to support DLG staff throughout the implementation phase to provide additional oversight and technical support along with support in problem solving.





# 4. Coordination

# 4.1. Communication between departments

DLG's Office of Federal and State Grants will utilize resources from other departments to ensure that contracts can be procured, payments can be made to subrecipients, and new staff can be hired. This coordination will require ongoing communication through existing channels.

To complete the review of applications, a project summary will be provided to the Executive Director, who in turn provides this document to the review committee and upon completion of the review projects will be recommended to the Governor for selection.

Outside of DLG, CDBG-DR staff will look to engage with other agencies like the Kentucky Housing Corporation and the Kentucky Division of Water to provide guidance on projects, resources, and strategy.

# 4.1.1. Kentucky Housing Corporation (KHC)

The Kentucky Housing Corporation invests in affordable housing solutions by offering programs and services designed to develop, preserve, and sustain affordable housing throughout the commonwealth. KHC has experience with administering federal programs, Low-Income Housing Tax Credits, homeownership education/counseling, housing rehabilitation, homeless programs, home energy and repair initiatives, as well as loan servicing. KHC's skills and focus areas make the organization a resource for the CDBG-DR housing programs. DLG plans to partner with KHC on their housing programs, specifically in implementing their new construction multi-family program.

# 4.1.2. Kentucky Division of Water (DOW)

The Kentucky Division of Water is focused on managing, protecting, and enhancing the Commonwealth's water resources and assisting in watershed management. Kentucky is divided into 7 major river basins, each of which is staffed by a Basin Coordinator. The Basin Coordinators serve as facilitators for agency activities and as a point of contact for local organizations interested in addressing clean water issues and watershed planning. DLG and the Division of Water are committed to partnering in the design and implementation of the infrastructure and planning CDBG-DR funds.

The two agencies have had several meetings to discuss the most advantageous infrastructure project that will assist in the mitigation of future disasters. The Watershed Management Plans for the seven watershed basins are also in need of updating. Through this partnership these plans can be updated to include the most recent flooding data as well as innovative future projects that can help to mitigate flooding events.





# 4.2. Communication with subrecipients

Kentucky DLG plans to fund units of general local government, such as Cities and Counties, as well as tribal authorities who will then award grant funds to citizens and for projects within their communities. DLG will be providing extensive CDBG-DR training as well as descriptive guidelines that each UGLG and Tribe will need to follow as they administer and award funding in their communities. Plans to fund also include non-profit organizations. One organization DLG can coordinating with is The Kentucky Housing Corporation (KHC), which is a nonprofit organization established to attract charitable contributions for affordable housing. For critical grant or program information, DLG will communicate via emails, letters, phone calls, and meetings when needed.

# 4.3. Communication with local and regional planning efforts/ Consultation with state and local emergency management agencies

Planning departments and consulting with Kentucky Council of Area Development Districts (ADDs), The Kentucky Association of Mitigation Managers (KAMM), The Division of Water (DOW), and Kentucky Emergency Management (KYEM) ensures effective communication and coordination to successfully provide consistent work and task completion. The knowledge these agencies possess is immense. The coordination between these agencies and our staff who have experience with HUD grants, required grant functions, and identified gaps will ensure success.

The ADDs are designed to be the linchpin in a necessary Federal-State-Local partnership that provides the optimum synergy to advance real improvement in the quality of life of Kentucky's citizens.

DOW specializes in water infrastructure, quality, resources, drinking water, watershed management, field operations, surface water permits, and program planning & support. DLG will consult with DOW on regional and state interests regarding planning and watershed management.

KAMM was formed to promote natural hazard mitigation and management in Kentucky. Current members represent local, state, and federal officials, floodplain coordinators, planning and zoning officials, engineers, surveyors, GIS specialists, hydrologists, public safety, and emergency managers. KAMM provides a forum for floodplain coordinators, emergency and mitigation managers, engineers, code enforcement officials, and surveyors. Gaining knowledge and network on issues pertinent to floodplain management, mitigation, and disaster recovery. KAMM enhances cooperation and the exchange of information among various related private and non-profit organizations; individuals; and local, state, and federal agencies.

KYEM is a division of the Kentucky Department of Military Affairs, KYEM coordinates a system of mitigation, preparedness, response, and recovery to protect the lives, environment and property of the people of Kentucky. Comprising of programs such as The Emergency Management Assistance Compact (EMAC), The Hazardous Materials Program, and The Planning Program. Providing guidance to ensure that local, regional, and state Emergency Operation Plans meet federal and state requirements for standard content, format and usability. When necessary DLG will consult with KYEM on emergency management measures.





# 5. Certification

The Kentucky Department for Local Government certifies to the accuracy and validity of
the evaluation of its internal risk and management capacity, as attested to by executing the
P.L. 117-43 Financial Management and Grant Compliance Certification for 2021 Grantees
receiving Community Development Block Grant - Disaster Recovery Funds (May 24, 2022),
submitted with this Certification Documentation and Implementation Plan.

Authorizing	Signature	

# Appendix A: Organizational Chart

