

CAPACITY ASSESSMENT AND STAFFING ANALYSIS

CDBG-DR

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Version History

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Introduction

The Disaster Relief Supplemental Appropriations Act, 2025 (Pub. L. 118-158) (“the 2025 Appropriations Act”), approved on December 21, 2024, will make funds available for the Community Development Block Grant - Disaster Recovery (CDBG-DR) program. \$1,639,381,000 is allocated for the County of Maui (DR-4724-HI) over a six-year grant term to address long-term recovery efforts in response to the Maui wildfires.

The County of Maui (the County) is dedicated to supporting its residents in rebuilding a safer, stronger, and more resilient community, helping them return home with the necessary support and resources in place. CDBG-DR funds will provide resources for housing, infrastructure, economic revitalization, public services, and mitigation projects. The programs are designed to address unmet long-term recovery needs, with a focus on prioritizing our most vulnerable residents, so that no one is left behind.

The County conducted a comprehensive capacity assessment and staffing analysis to evaluate its ability to effectively manage the funds and associated risks. This plan outlines the County’s readiness to implement CDBG-DR activities and details strategies to address any identified gaps. It demonstrates the County’s commitment to proper stewardship of funds and transparency in their use.

Capacity Assessment

Lead Principal Agency

In response to the Maui wildfires, the County of Maui constructed a framework to ensure recovery efforts were community led, and government supported. The County of Maui established the Office of Recovery (OOR) to lead the planning and implementation of disaster recovery efforts. The initial structure integrated existing County agencies with newly established recovery support functional groups (RSFs), facilitating a coordinated effort to address the diverse needs and priorities of recovery.

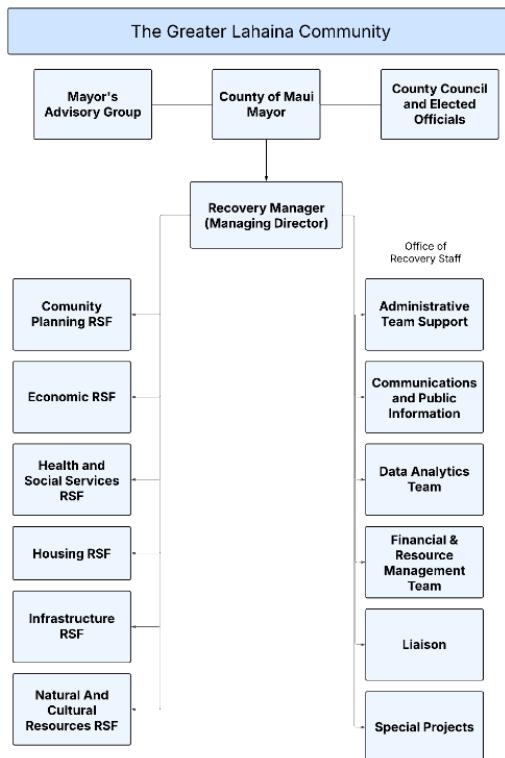


Figure 1 Office of Recovery (OOR)

The OOR has been restructured to retain the Recovery Staff, while the RSF staff have returned to their original departments. The OOR staff now report to the new OOR Administrator and oversee various funding sources that support recovery activities. Due to the substantial scale of the CDBG-DR funds, a sub-unit under the Office of Recovery has been created to oversee the management of the grant and ensure the successful execution of its programs, in full compliance with federal regulations.

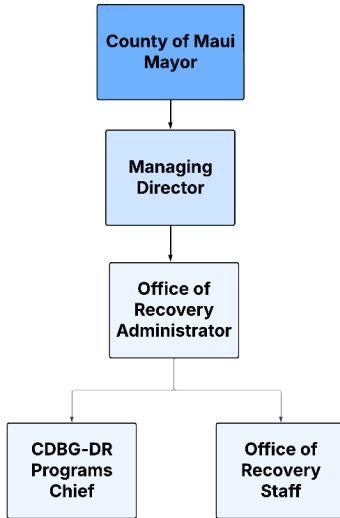


Figure 2 OOR Restructure, including CDBG-DR

Hierarchy of Program Accountability

The County of Maui's Mayor serves as the Chief Executive Officer and is responsible for the day-to-day operations of the county government. Working alongside the Mayor is the Legislative Branch, which oversees policymaking, enacts laws, and approves the use of public funds, including CDBG-DR allocations.

The Managing Director oversees all County department directors, including the OOR Administrator. The OOR Administrator oversees the CDBG-DR Programs Chief and Fiscal Officer. The Programs Chief will supervise program implementation and federal grant compliance. The Internal Auditor will report directly to the Mayor.

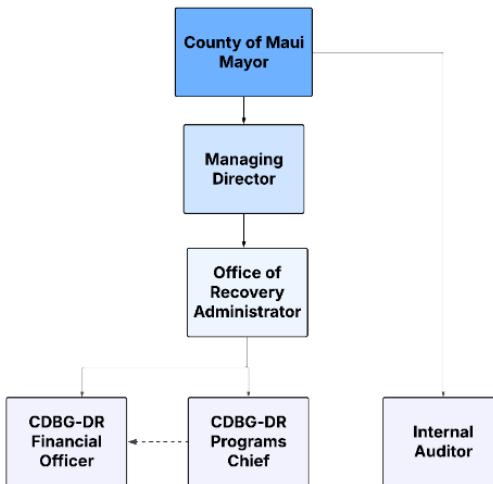


Figure 3 CDBG-DR under OOR

Description of Capacity Assessment

The County of Maui Office of Recovery distinguishes itself through its commitment to community-driven initiatives and a compassionate approach to serving disaster-impacted survivors. Recognizing that the County has not previously administered CDBG-DR funds, to ensure compliance and accelerate delivery, the County plans to engage an experienced program management consultant (PMC), also referred to as an implementation contractor, who will provide technical support and operational capacity across all program areas. The PMC will also manage the construction manager (CM). We developed a task crosswalk that identifies the key activities required for the successful and timely implementation of housing and infrastructure projects, economic revitalization efforts, and public services. Centering community needs, we identified the most appropriate lead entity responsible for the execution of each task.

Full-time equivalent (FTE) estimates were calculated based on staffing needs over the entire grant cycle, including adjustments for increased demand during peak implementation and monitoring, and decreased needs during program closeout. A summary of the FTE calculations is provided below, with additional detail available in Appendix A.

Responsible Party	FTE
County	55.54
PMC	27.82
CM	6
Split (Shared time between PMC and County)	21.68

The County will hire or assign a total of 56 positions specifically for CDBG-DR operations. While the combined County and PMC FTE may exceed the total estimated need, CDBG-DR funds will not be used to supplant existing County staff time already allocated to some of the tasks outlined in Appendix A. The County will assess staff needs annually to ensure that any augmentation aligns with current CDBG-DR grant activities.

Timeline & Method of Addressing Capacity Gaps

To ensure successful implementation of our CDBG-DR programs, we are proactively addressing personnel capacity and system readiness. Our plan includes staged hiring and contractor support. A limited County-funded budget was allocated under the Office of Recovery to enable immediate hiring and contractor procurement as needed until a grant agreement could be executed with HUD. With 150 applications received to date, we are well-positioned to scale our team immediately.

To mitigate the risk of staffing delays and shortages, we are first onboarding and cross-training Program Managers and Specialists across multiple functional areas. This approach ensures operational flexibility as the program scales up. While we are currently focused on meeting HUD deadlines for grant agreement execution, we are also simultaneously planning for the next phase by preparing to deploy key systems as soon as staff and the implementation contractor are onboarded. To ensure continuity, we are prepared to supplement capacity through contractor support, strategic partnerships with local organizations, and the reprioritization of lower-risk activities, if staffing challenges persist.

Succession planning will be embedded into key positions to ensure continuity of operations. The County will cultivate a culture of mentorship and professional development within the CDBG-DR department, strengthening internal capacity while mitigating staffing risks. We are exploring a 1:1 pairing model between County staff and key contractor personnel to promote knowledge transfer and reduce long-term reliance on contractors. This investment in internal talent will build a sustainable workforce model to support current and future recovery needs.

Open Monitoring and Audit Findings Related to HUD CPD Programs

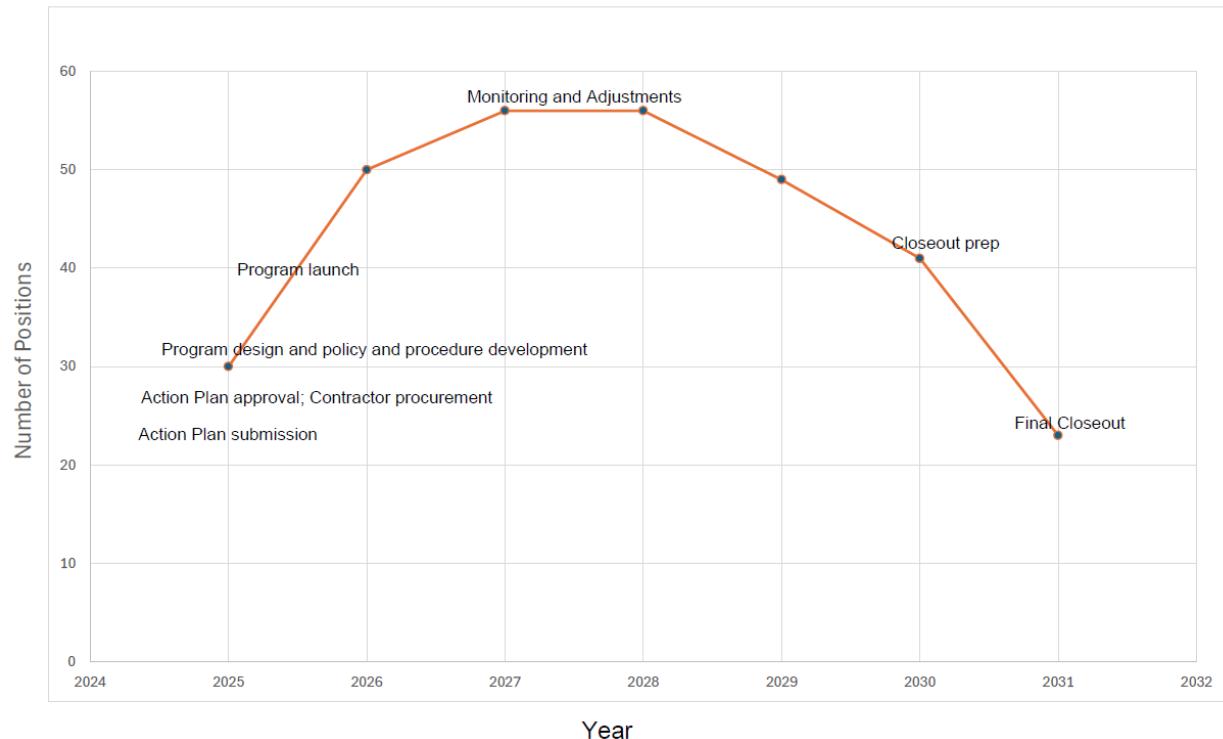
At this time, the County has no open monitoring findings or unresolved audit findings related to any HUD Community Planning and Development (CPD) programs. The County remains committed to maintaining strong compliance and financial oversight practices.

Staffing

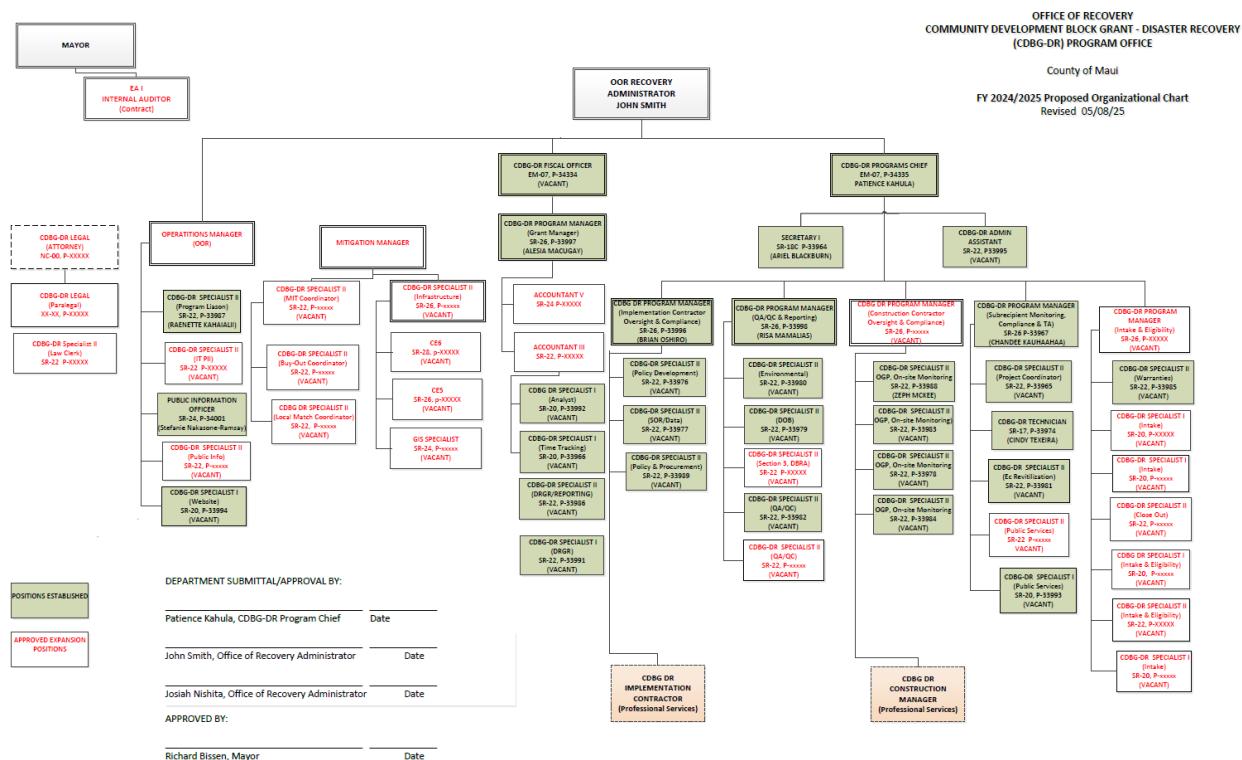
The County is preparing for early obligation of funds to plan and prepare for staffing needs across the entire grant lifecycle and ensure timely expenditure. Core staff essential to program launch will be onboarded as funds are obligated, followed by the phased hiring of monitoring and compliance personnel in response to increased program activity and community engagement. The table below shows how staffing will rise or fall in response to changes in program activities, as indicated by corresponding spending levels.

	2025 (6 months)	2026	2027	2028	2029	2030	2031 (6 months)
Admin	\$ 6,830,754.17	\$ 13,661,508.33	\$ 13,661,508.33	\$ 13,661,508.33	\$ 13,661,508.33	\$ 13,661,508.33	\$ 6,830,754.17
Housing	\$ 148,579,950.00	\$ 50,000,000.00	\$ 50,000,000.00	\$ 50,000,000.00			
Infrastructure and Public Facilities		\$ 300,000,000.00	\$ 97,000,000.00	\$ 1,000,000.00	\$ 1,000,000.00	\$ 1,000,000.00	
Economic Revitalization		\$ 11,500,000.00	\$ 3,500,000.00				
Public Services		\$ 25,000,000.00					
Mitigation		\$ 213,832,000.00					
PERSONNEL COST (included in obligated program funds) >>>	\$ 1,766,443.92	\$ 5,806,731.36	\$ 6,651,220.33	\$ 6,651,220.33	\$ 5,815,318.96	\$ 4,935,246.83	\$ 1,459,186.54
Percent of total anticipated 6-year personnel costs >>>	5.34%	17.55%	20.10%	20.10%	17.58%	14.92%	4.41%
Grant expenditure/obligation per year	\$ 155,410,704.17	\$ 944,993,508.33	\$ 287,661,508.33	\$ 179,661,508.33	\$ 39,661,508.33	\$ 23,661,508.33	\$ 8,330,754.17
Cumulative	\$ 155,410,704.17	\$ 1,100,404,212.50	\$ 1,388,065,720.83	\$ 1,567,727,229.17	\$ 1,607,388,737.50	\$ 1,631,050,245.83	\$ 1,639,381,000.00
Total Grant Funds Obligated/Expended	9.48%	67.12%	84.67%	95.63%	98.05%	99.49%	100.00%

Staffing plans are strategically aligned with key grant milestones, including Action Plan approval, program launch, monitoring, and closeout. This approach offers an activity-based justification for projected personnel costs, demonstrating the reasonableness of expenditures across program areas.



Proposed Organizational Chart



See larger format in Appendix B.

The County's proposed organizational chart consists of functional areas such as:

- Administrative Oversight
- Audit
- Legal
- Operations
- Mitigation Activities
- Grant and Financial Management
- Program Implementation, including Monitoring and Compliance (QA/QC)

The County has designated positions to provide oversight and support for CDBG-DR activities. While not all these positions will be directly charged to the grant, each plays a critical role in ensuring compliance, interdepartmental coordination, and effective program delivery. The following sections outline the primary responsibilities of each functional area and the key personnel contributing to the administration of CDBG-DR funds.

Financial Management and Compliance Capacity – Responsible Areas Overview

	Financial Management Controls	Procurement	Website	Fraud, Waste, and Abuse	DOB	Timely Expenditure
Admin. Oversight	Approves internal control frameworks and ensures policies are adopted across departments and contractors	Coordinates procurement process; execution of contracts	Responsible for overall communication strategy	Oversees program integrity measures, supports risk mitigation strategies, escalates suspected fraud for investigation		Oversees overall grant performance to ensure funds are expended within HUD timelines
Audit	Ensures compliance with policies and procedures	Ensures transparency and accuracy of financial disclosures posted publicly	Ensures transparency and accuracy of financial disclosures posted publicly	Independently conducts internal reviews and risk assessments	Ensures proper implementation of DOB policies and procedures including recapture process for recovering funds if a DOB is discovered post-award	Monitors timing of expenditures in relation to deadlines; flags risks for under/ overspending and/ or obligation gaps
Legal		Develops and provides guidance for contracts		Reviews policies, support or lead legal review of suspected fraud cases, drafting contracts and subrecipient agreements with fraud clause, provide guidance on enforcement actions, draft and review subrogation agreements, advise on appeals from applicants, guide data-sharing agreements		Reviews legal constraints that may affect timely contracting/ program obligations; supports resolution of any legal barriers
Operations			Ensures consistent			Works with the

			messaging with overall recovery efforts; maintains public-facing disaster recovery site.			implementation and communications teams to ensure program messaging is rolled out on time and aligns with established timelines and benchmarks.
Mitigation Activities	Track budgets and spending for mitigation allocations, ensure cost eligibility, coordinate with Grant Manager for DRGR reporting, monitor DOB, maintain audit documentation.	Provide scope input for mitigation activities to ensure all applicable cross-cutting requirements are addressed, and coordinates with procurement staff to integrate these requirements into solicitations and contracts		Verify property ownership and occupancy documentation, cross-check applicant information against public records and federal data sources, coordinate with compliance and legal teams on flagged issues		Oversees the timely execution of mitigation activities to ensure expenditures align with project schedules and grant deadlines, coordinating with procurement and finance teams to prevent delays in obligation and drawdown of funds
Grant and Financial Mgmt.	Develops and implements financial management policies and procedures, with a focus on establishing internal controls to prevent improper payments and unauthorized drawdowns	Ensures full and open competition, cost reasonableness, and tracks contracts		Develops and implements policies, procedures, and internal controls		Monitors spending progress, tracks performance milestones, and ensures compliance with expenditure deadlines; ensures that drawdowns of funds are timely and aligned with eligible activities and approved program budgets

Implementation Oversight and QA/QC	Monitor consistency of Action Plan and all amendments with financial controls, review and document compliance of substantial and non-substantial amendments with HUD requirements	Supports reviews of procurement documentation for completeness and compliance	Monitoring of Action Plan, Substantial or non-substantial amendments	Develops and implements policies and procedures; monitors program activities; subrecipient performance monitoring	Verification of eligibility and HUD cross-cutting requirements; conducts DOB analysis and maintains documentation; coordinates with subrecipients to gather necessary documentation; implement QA/QC initiatives to ensure compliance with HUD rules and regulations	Coordinates activities to ensure timely implementation of activities; subrecipient performance monitoring
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OOR Administrator

This position is responsible for the overall coordination of county-wide disaster recovery efforts, ensuring efficiency and preventing duplication of efforts. It also ensures recovery funds are strategically leveraged to maximize impact and support long-term community resilience.

This role oversees procurement and contract management related to disaster recovery, ensuring that all purchasing and contracting activities are compliant with federal, state, and local regulations. The administrator provides guidance on procurement strategy, monitors contractor performance, and coordinates with internal teams to ensure timely execution and accountability across all recovery-related contracts.

Audit

The audit functional area will be contracted and will report directly to the Mayor. Given the size of the County's CDBG-DR allocation and the complexity of its programs, internal audit will require a dedicated team rather than a single individual. The audit team conducts internal audits to ensure accountability, transparency, and compliance with federal, state, and local regulations related to CDBG-DR funds. Duties include but are not limited to:

- Ensuring compliance with CDBG-DR policies and procedures
- Ensuring accurate grant reporting
- Conducting internal reviews, risk assessments, and audits to identify potential issues
- Recommending corrective actions based on identified issues
- Performing follow-up audits to check on implementation
- Coordinating with external auditors, including HUD and the HUD Office of Inspector General, as needed

Legal

The objective of the legal support team is to ensure that all CDBG-DR procurement, contracting, and program implementation activities comply with applicable federal, state, and local laws.

Deputy Corporation Counsel

This position is recruited through the County's Department of the Corporation Counsel (DCC) and funded through CDBG-

DR. The Deputy is essential and necessary for the development, review, and approval of procurement documents and contracts.

- Reviews and approves contracts, procurement documents, and MOUs for legal sufficiency
- Advises on compliance with federal procurement regulations, conflict of interest rules, and CDBG-DR program requirements
- Provides legal counsel to the CDBG-DR program which includes, but is not limited to, dispute resolution, enforcement actions, and compliance with federal civil rights requirements, including obligations to ensure access to housing opportunities and address barriers related to land use, zoning, and program implementation

Paralegal

CDBG-DR will fund this position to provide dedicated support to the Deputy specifically assigned to CDBG-DR in response to the increased workload associated with disaster recovery procurement and contract activities.

- Supports the attorney in drafting, reviewing, and organizing legal documents related to CDBG-DR procurements and agreements
- Conducts legal research; tracks contract workflows
- Assists in preparing responses to HUD or audit inquiries

Specialist II (Law Clerk)

CDBG-DR will fund this position to provide dedicated support in DCC to ensure timely processing of CDBG-DR related contracts.

- Provides administrative support for legal processes, including document filing, records management, scheduling, and routing of procurement packages and legal correspondence
- Ensures timely tracking and archiving of executed agreements and contract amendments

Operations

To support a clear, consistent, and strategic communication effort across Maui County's CDBG-DR recovery programs, we have established a multifaceted communications team that integrates dedicated staff and contracted expertise. This structure ensures alignment with HUD's Universal Notice requirements, including the maintenance of a public-facing website and proactive community outreach.

Public Information Officer

The PIO supports the communications strategy led by the contracted communications team by ensuring all messaging complies with HUD regulations and aligns with the broader goals of the Office of Recovery. The PIO serves as a liaison between County departments, the contractor, and community stakeholders. Responsibilities include:

- Reviewing and coordinating materials for accuracy
- Overseeing community presentation logistics
- Promoting clear and consistent public information across all recovery efforts

Specialist I (Website)

The Communications Specialist is dedicated to supporting the maintenance of the CDBG-DR program website, ensuring content remains current, accessible, and compliant even when website development and updates may be performed by a contracted firm. This role is responsible for:

- Coordinating with internal teams and the contractor to gather updates, track deadlines, and verify that posted information meets HUD requirements
- Assisting with drafting outreach materials, supporting engagement events, and managing updates across communication platforms to ensure consistency and responsiveness

Contracted Communications Firm

To enhance capacity and bring specialized expertise, the County will engage a professional communications firm, through the program implementation contractor, to lead the development and execution of a robust communications and marketing strategy for the CDBG-DR program. Working in close coordination with the PIO, the contractor may be responsible for:

- Designing and implementing a comprehensive communications and outreach strategy
- Creating a wide range of communications materials, including brochures, flyers, social media content, videos, and graphics.

- Developing, hosting, and technically maintaining the dedicated CDBG-DR website, ensuring compliance with accessibility standards and HUD guidance
- Supporting branding, outreach campaigns, and community education initiatives
- Providing strategic advice on crisis communication, audience targeting, and performance evaluation through engagement metrics.

Grant and Financial Management

The Grant and Financial Management Team is responsible for overseeing the sound financial stewardship of all CDBG-DR funds in accordance with HUD's financial management certification requirements, 2 CFR Part 200, and the CDBG-DR Universal Notice.

Programs Chief

The Program Chief provides executive oversight for the implementation of the CDBG-DR program and the associated financial management framework.

- Lead overall implementation of the CDBG-DR program, including planning, policy development, program design, and performance monitoring.
- Oversee the development and execution of program management systems, staffing structures, and cross-departmental coordination
- Supervise the integration of programmatic and financial operations to ensure compliance and efficiency
- Coordinate development and submission of the Action Plan, amendments, performance reports, and other HUD-required documentation
- Oversee risk management and monitoring activities to identify and resolve implementation challenges
- Serve as the primary liaison with HUD, state and federal agencies, and external auditors on both programmatic and financial matters
- Provides strategic leadership and oversight of the financial management framework for all CDBG-DR activities

Fiscal Officer

- Ensures financial policies and procedures are in place and consistent with HUD requirements, including internal controls, segregation of duties, and financial reporting standards
- Coordinates across departments to align budget planning, expenditure tracking, and performance metrics
- Leads the development of financial monitoring plans and risk assessments as required by HUD
- Coordinates with HUD and external auditors on overall financial performance and compliance
- Manages day-to-day accounting, budgeting, and cash management functions for the CDBG-DR program
- Prepares and reconciles financial statements, tracks expenditures against budgeted activities, and ensures timely drawdowns through the Disaster Recovery Grant Reporting (DRGR) system
- Supports procurement and contract finance reviews, including cost reasonableness, allowability, and allocability assessments
- Implements controls to ensure non-duplication of benefits, proper documentation of costs, and compliance with federal financial standards

Grant Manager

- Coordination and supervision of program accountants responsible for processing expenditures, reconciliations, and documentation
- Manage and ensure the accuracy of all DRGR system entries, including obligations, drawdowns, and performance data
- Monitor expenditure trends across CDBG-DR activities to ensure consistency with approved budgets and Action Plan allocations
- Ensure timely and compliant drawdown requests, working with program and finance teams to reconcile spending and maintain audit-ready records
- Support the development of policies and procedures for financial compliance, internal controls, and documentation standards
- Prepare and review grant financial reports for HUD submissions, audits, and internal monitoring reviews
- Assist in the financial monitoring of subrecipients and contractors to ensure costs are eligible, allowable, and

- adequately supported
- Preparing and submitting the County's quarterly performance report until grant close-out

Program Implementation and Monitoring and Compliance

Case Management

Effective intake and eligibility management is essential to ensuring timely, fair, and culturally sensitive delivery of CDBG-DR assistance. Given the complexity and community-specific needs of our recovery programs, the County will leverage contractor expertise and tools to help establish efficient intake systems and eligibility protocols. While the County is exploring the possibility of assuming direct responsibility for case management, it will continue to draw on contractor knowledge to ensure a high-quality program launch and ongoing technical support.

To further support implementation and strengthen community trust, the County may engage local partner organizations with proven capacity to assist in intake, eligibility determination, and direct case management services if internal staffing challenges persist. This hybrid approach, blending County leadership, contractor expertise, and local partnerships, ensures that intake and eligibility processes are responsive to community needs, HUD-compliant, and ready to support timely program implementation.

The County anticipates approximately 641 potential applicants for the Single-Family Reconstruction Program, based on the number of owner-occupied homes destroyed and the estimated percentage of Low- to Moderate-Income (LMI) households in Lahaina. To support this effort, the County is exploring staffing seven dedicated case manager positions and one supervisory position. These case managers will guide applicants through the intake, eligibility determination, documentation, duplication of benefits review, and coordination processes required under CDBG-DR regulations.

Recognizing that an average caseload of over 90 applicants per case manager could exceed typical benchmarks for high-touch disaster recovery programs, the County will implement a phased prioritization of applications based on early identification of eligibility. This phased approach, targeting the most vulnerable or ready applicants first, will help distribute workload over time, allowing case managers to operate at a more sustainable and effective caseload level. This strategy is intended to ensure both compliance with HUD program standards and a responsive, person-centered service model for disaster-impacted homeowners.

Applications for programs where awards are provided through subrecipient agreements or other contractual arrangements, such as those involving nonprofit developers, infrastructure partners, or economic revitalization grantees, will be managed by other Program Managers.

Case managers, whether County staff or supported through contracted or partner organizations, will be responsible for:

- Conducting intake and screening for disaster recovery programs, ensuring all applicants are treated respectfully and equitably
- Assisting applicants with completing applications and gathering required documentation to establish eligibility
- Providing clear communication and status updates to applicants throughout the process
- Verifying applicant information and making eligibility determinations in accordance with CDBG-DR program rules
- Coordinating with finance, program, and compliance staff to ensure accurate data entry and documentation
- Managing an appropriate caseload to ensure timely processing and quality service delivery
- Maintaining detailed case files to support monitoring, audit readiness, and program transparency
- Flagging complex or high-risk cases for supervisor or legal review

Program Managers

The County will staff six program managers to oversee the implementation, coordination, and monitoring of CDBG-DR programs. Each program manager is assigned a specific area of responsibility and is supported by appropriate staff to ensure compliance and effective delivery. The six areas of oversight are:

- Implementation Contractor Oversight and Compliance
- QA/QC and Reporting
- Construction Contractor Oversight and Compliance

- Subrecipient Monitoring, Compliance, and TA
- Intake and Eligibility
- Mitigation

Due to the complexity and interdependence of CDBG-DR-funded programs, the County has intentionally structured these program manager roles to promote cross-functional collaboration. This structure is designed to ensure that program activities are well-aligned, avoid duplication of efforts, and maintain a streamlined, coordinated approach across housing, infrastructure, mitigation, and economic revitalization efforts.

The following chart outlines how each program manager's responsibilities intersect across the various programs, reinforcing a team-based strategy for efficient and compliant recovery.

	Housing	Economic Revitalization	Public Services	Infrastructure	Mitigation
Implementation Contractor Oversight and Compliance Manager	Tracks task order implementation and assesses contractor performance with contractual scope and deliverables. The County's implementation contractor will provide support for environmental reviews required for all applicable CDBG-DR-funded activities. This support may include preparing Environmental Review Records, conducting site assessments, coordinating with relevant regulatory agencies, and assisting with all documentation required.				
QA/QC Manager	Review eligibility determinations; conduct file audits; monitor compliance with program requirements and internal policies and procedures, national objective standards, and cross-cutting requirements; flag potential fraud, waste, abuse, or misrepresentation in applications or reports; identify training needs and improve data accuracy and consistency; support internal monitoring reviews.				
Construction Contractor Oversight and Compliance Manager	Monitor contractor performance; conduct site inspections and desk reviews; ensure compliance with cross-cutting requirements; review and approve contractor invoices and change orders; coordinate with program staff and QA/ QC to address deficiencies, resolve disputes, and support timely project delivery			Same duties under housing	
Subrecipient Monitoring, Compliance, and TA Manager	Oversee application process, scoring criteria, and selection panel for subrecipient awards; monitor compliance and performance; aggregate reporting; provide technical assistance and training to subrecipients on program rules, reporting, documentation, and best practices in partnership with the implementation contractor; coordinate corrective actions				
Intake and Eligibility Manager	Oversee intake operations; supervise eligibility determination				

	processes; assist with development and implementation of intake protocols in partnership with implementation contractor; train and support case managers; coordinate with QA/QC to resolve complex eligibility issues and maintain data integrity across systems				
Mitigation Manager				Oversee design and implementation of mitigation activities; ensure all projects align with needs assessment; coordinate between programs to ensure mitigation measures into recovery projects; ensure compliance with HUD requirements; track progress and outcomes.	

All Program Managers will collaborate closely on the development, periodic review, and ongoing maintenance of program policies and procedures to ensure consistency, regulatory compliance, and operational efficiency across all CDBG-DR activities. This coordination ensures that cross-cutting requirements, HUD guidance, and local implementation needs are fully integrated into each program area. Regular interdepartmental meetings and working sessions will be held to review policy effectiveness, address updates based on HUD feedback or monitoring findings, and streamline processes across housing, infrastructure, economic revitalization, public services, and mitigation activities.

Technical Assistance

Maui County will provide a structured onboarding and training program for all CDBG-DR staff across the entire grant lifecycle and program implementation leveraging contractor support, HUD technical assistance trainings and resources, peer-to-peer learning opportunities, internal policy and procedure manuals, and hands-on guidance from program managers to ensure new staff are quickly integrated and equipped to implement disaster recovery activities in full compliance with HUD requirements. Staff onboarding and training will model the following outline and adjust as needed:

1. Pre-Start:
System setup, welcome packet, unit assignment
2. Week 1 – Orientation:
Program overview, HUD CDBG-DR basics, ethics, and compliance; Fraud, Waste, and Abuse Training
3. Weeks 2–4 – Role-Specific Training:
Shadowing, systems training, contractor-led technical sessions, HUD TA resources
4. Ongoing Support:
Monthly check-ins, refresher trainings, peer learning
5. Evaluation & Continuous Improvement:
30-/90-day feedback, performance review input, process updates

Technical assistance for subrecipients will model the following outline and adjust as needed:

1. Initial Onboarding and Orientation
 - a. Introductory training on CDBG-DR requirements, program goals, and responsibilities
 - b. Distribution of program manuals, HUD guidance, and reporting templates
2. Ongoing Training and Capacity Building
 - a. Regular virtual or in-person workshops on key topics
 - b. Q&A sessions led by County staff or implementation contractor SMEs
3. Individualized Technical Support
 - a. One-on-one TA sessions to address program-specific or compliance issues
 - b. Assistance with development of internal controls, file documentation, and reporting systems
4. Monitoring-Driven TA
 - a. Targeted TA based on risk assessments and monitoring results
 - b. Corrective action support and follow-up training where deficiencies are identified
5. Resource Sharing and Communication
 - a. Access to a TA resource hub (manuals, tools, templates)
 - b. Regular communication via subrecipient newsletters, help desk, and office hours
6. Documentation and Evaluation
 - a. Maintain records of TA provided
 - b. Evaluate TA effectiveness through feedback surveys and subrecipient performance tracking

The implementation contractor will be responsible for designing and maintaining metrics and reporting systems to assess the technical assistance needs of both internal staff and subrecipients. These tools will help identify gaps in staff knowledge, capacity, and program implementation, enabling the County to deliver targeted training and support that strengthens compliance, performance, and overall program effectiveness.

Communication

The OOR Administrator, Operations staff, and Office of Recovery team will facilitate coordination across all CDBG-DR programs through interdepartmental collaboration, consistent information sharing, and active engagement with program managers to ensure alignment of policies, timelines, and recovery priorities. The County is well-positioned to implement recovery programs effectively due to staff who have been directly engaged in wildfire response and early-phase recovery operations, bringing first-hand knowledge of those who were impacted, familiarity with local recovery partners, and experience navigating disaster-related challenges unique to Maui. Communication is further reinforced through continued meetings with the Lahaina Advisory Committee, twice-monthly community engagement, and weekly disaster recovery coordination meetings, ensuring alignment across programs, transparency with the public, and responsiveness to evolving community needs.

Maui County will maintain ongoing consultation with key state and local agencies that have primary responsibility for administering FEMA, USACE, and other related disaster recovery programs to ensure alignment, reduce duplication, and support effective implementation of CDBG-DR activities. The County will coordinate closely with the Hawaii Emergency Management Agency (HI-EMA) to align mitigation strategies and leverage complementary funding sources.

To address infrastructure needs, the County will collaborate with the Departments of Planning, Housing, Environmental Management, Water Supply, Public Works, Parks and Recreation, and Agriculture, as well as with the State of Hawai'i's Department of Land and Natural Resources (DLNR).

As the recovery evolves, Maui County will update this consultation framework to reflect any changes in agency roles or responsibilities, ensuring continued coordination throughout the life of the program.

Conclusion

Maui County affirms that this submission meets all requirements outlined in Section II.A.1.g of the CDBG-DR Universal Notice regarding the Capacity Assessment and Staffing Analysis. The County has identified the Office of Recovery as the lead agency responsible for implementation of the CDBG-DR award, with direct reporting to the Mayor as the jurisdiction's chief executive officer. The County has conducted a full assessment of its capacity to carry out CDBG-DR recovery activities and developed a timeline with clear milestones to address any identified capacity gaps.

The assessment includes disclosure of any open monitoring or HUD OIG audit findings related to CPD programs, along with updates on corrective actions. The accompanying staffing analysis provides an organizational chart that clearly designates responsibility for each of the required Financial Management and Grant Compliance Certification components, and documents the County's staffing strategy, including roles for case management, program area management (housing, infrastructure, economic revitalization), and compliance functions.

Additionally, the County outlines its approach to training and technical assistance for new hires and subrecipients, including the use of onboarding frameworks and subject matter expert support from the implementation contractor to fill technical knowledge gaps and ensure timely, compliant recovery operations.

Appendix A. FTE Estimated Calculations

Roles and Responsibilities	Ongoing	Variable	Total	Primary Staffing
	72.47	38.57	111.04	
Administration and Fiscal				
Oversees the implementation of CDBG-DR funds with the County of Maui infrastructure including coordination across departments, grant and budget management, procurement, contract execution, and disbursement of funds. Also ensures alignment with Lahaina LTR plan and community priorities.				
Overall coordination and management with OOR and other applicable County departments	1			County
Program oversight and compliance monitoring	1			County
Grant and budget management	2	1		County
Stakeholder Coordination	0.1			County
Procurement of PMC and CMC		0.25		County
Negotiate and execute contracts with PMC and CMC		0.0833		County
Monitor and report program expenditures	1			County
Account reconciliation	2			County
Disbursement and Cash Management	2			County
Hiring and onboarding employees to the County	1			County
TOTAL	10.1	1.33333	11.43	
Operations				
Manages the physical and logistical needs of CDBG-DR program staff and workflows.				
Secure and establish office space for internal operations	1			County
Order supplies and furniture	0.25			County
Coordinate set-up (to include IT)	1			County
Facility maintenance (cleaning etc.)	1.5			County
TOTAL	3.75	0	11.43	
Planning and Policy Support				
Leads program design, policy development, and procedural frameworks to guide implementation.				
Program Design	2			Split
Policies and Procedure Development for programs	2	4		Split
Drafting NOFAs and Establishing ranking criteria for applications	1	1.25		Split
Monitoring cost estimates to ensure reasonableness	2			Split
Preparing Action Plan Amendments as needed	0.1769			Split
Policy Version Management	2			Split
Develop and manage internal communication channels to ensure consistent dissemination of policies and application procedures	0.5			County
TOTAL	9.67692	5.25	14.93	
Strategic Communications (External)				
Coordinates public-facing communication strategies to educate, inform, and engage communities about CDBG-DR programs.				
Develop a comprehensive communication strategy to support program delivery, implementation activities, and community engagement to include preparation for eligibility	2	0.2128		PMC
Establishing and maintaining website for public information	1			PMC
Providing customer service through various media	1			County
Ensuring communications comply with federal regulations	1			PMC
Maintaining documented communications with government organizations	0.5			PMC
Providing alternative methods of communication for those with accessibility concerns	1	3		PMC
Conducting community outreach to ensure reach to all potentially eligible households		5		PMC
TOTAL	6.5	8.21282	14.71	
Internal Communications				
Develops and maintains communication systems for program staff to ensure consistency, transparency, and responsiveness across departments.				
Establish centralized communication framework with central hub for staff information, standardized templates for reports and memos, defined roles and responsibilities	0.25			County
Implement regular coordination meetings	0.75			County

Implementation of tools required for internal communications (dashboards, project management tools, technical assistance with tools)	0.25			County
Create a feedback mechanism (reporting issues, gaps, and implement quality improvement process)	0.25			County
TOTAL	1.5	0	14.71	
Program Implementation/ Client-Facing Services				
<i>Directly administers services to applicants and beneficiaries including subrecipients for infrastructure and public facilities projects, economic revitalization programs, and public services.</i>				
Facility and operations management of public intake facilities	1			PMC
Supervision of intake and eligibility staff	1.5			County
Hiring of Intake and Eligibility staff	0.0115	0.25		County
Supplies and IT management	1			County
Application form development and submission procedures		0.25		PMC
Scoring criteria development	0.0833			PMC
Workflow development		0.3077		PMC
Staff Training	1			PMC
Personnel support	1			County
Program coordination with communications team	0.5	1		Split
Appointment systems	0.125	1.0625		PMC
Customer service operations	1.0808	1		County
Preliminary application screening	6	6		County
Scoring panel		0.0769		County
Special considerations panel	0.2769			County
Environmental Review	1	2		PMC
Duplication of Benefits Assessment	1	2		PMC
Eligibility determination	1			County
Notice of Award	0.75			County
Award administration and escrow process management	1	1		Split
Coordinate award and CMC operations as applicable	1.0808			PMC
Contract development and execution	1	1		PMC
Technical assistance for subrecipients	1			County
Subrecipient monitoring	1			County
Buy-out and local match coordination		1.7692		County
Project planning and prioritization (infrastructure)	1	0.0538		Split
Documentation and reporting	2			County
Project closeout and continued monitoring coordination hand-off		1		County
TOTAL	25.4083	18.7702	44.18	
Construction				
<i>Provides services to support the delivery of projects.</i>				
Design		1		CMC
Code compliance	1			CMC
Permitting	1			CMC
Pre-construction documentation and clearance	1			CMC
Bid and contractor support	1	1		CMC
TOTAL	4	2	6.00	
Compliance and Monitoring				
<i>Ensures adherence to federal and local compliance standards and readiness for site monitoring visits/ audits.</i>				
DRGR set up and maintenance	1			County
Data management and coordination with communications and administration for timely updates and public transparency	1			PMC
Quarterly Progress Reports	0.25			County
Develop and implement quality assurance and improvement initiatives	1			County
Technical assistance for compliance with federal regulations	0.2			Split

Conducting training for staff and subrecipients on compliance	0.2	1		County
Conducting risk assessments and regular monitoring of subrecipients	1			County
Preparation for site monitoring visits	0.0833			County
Ensures appropriate process for complaints or activities out of compliance	0.2			County
Coordination of activities between program staff and internal auditor	0.1538			County
TOTAL	5.08718	1	6.09	
Program Implementation Vendor Management and Coordination				
<i>Supervises the performance and compliance of PMC and sub contractors.</i>				
Task order coordination and monitoring	0.25	1		County
Invoice review and fiscal coordination	1			County
Communication coordination between County and Vendor staff in partnership with internal communication team	0.25			County
Reporting to administration any concerns	0.25			County
TOTAL	1.75	1	2.75	
Construction Management Coordination				
<i>Supervises the performance and compliance of construction management vendors.</i>				
Overseeing the Construction Management Vendor's Performance	0.2			PMC
Site and compliance monitoring	3			County
Invoice review and fiscal coordination	1	1		Split
Providing monthly status reports on construction activities	0.5			Split
TOTAL	4.7	1	5.70	

Responsible Party	FTE
County	55.54
PMC	27.82
CMC	6
Split (Shared time between PMC and County)	21.68

Appendix B. Proposed Organizational Chart

**OFFICE OF RECOVERY
COMMUNITY DEVELOPMENT BLOCK GRANT - DISASTER RECOVERY
(CDBG-DR) PROGRAM OFFICE**

County of Maui

FY 2024/2025 Proposed Organizational Chart
Revised 05/08/25

