
AUDIT REPORT



CITY OF MONTGOMERY, ALABAMA

COMMUNITY DEVELOPMENT

BLOCK GRANT – MADISON PARK

2003-AT-1005


JUNE 11, 2003

OFFICE OF AUDIT, REGION 4



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| Issue Date | June 11, 2003 |
| Audit Case Number | 2003-AT-1005 |

TO: Harold Cole, Director, Community Planning and Development, 4CD

FROM: Nancy H. Cooper 
Regional Inspector General for Audit, 4AGA

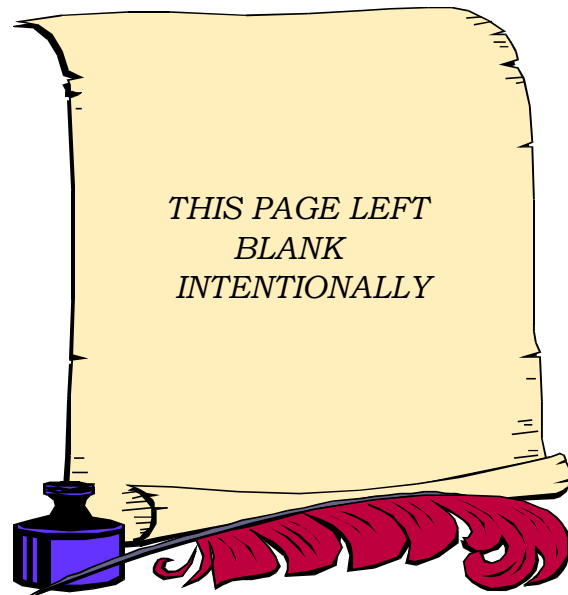
SUBJECT: City of Montgomery, Alabama
Community Development Block Grant – Madison Park

We completed an audit of the City of Montgomery, Alabama, Community Development Block Grant (CDBG) activities related to the Madison Park sewer project. The audit was initiated in response to a Congressional request based on a citizen's complaint concerning alleged misappropriated funds, suspected improprieties, and inadequate controls over the Madison Park project. Our objectives were to determine the validity of the complaint and whether the City complied with Federal laws, Department of Housing and Urban Development (HUD) regulations, and other requirements; and had adequate controls to assure effective and efficient administration of program funds related to the project. Our report contains two findings.

In accordance with HUD Handbook 2000.06 REV-3, within 60 days, please provide us, for each recommendation without management decisions, a status report on: (1) the corrective action taken; (2) proposed corrective action and the date to be completed; or (3) why action is considered unnecessary. Additional status reports are required at 90 days and 120 days after report issuance for any recommendation without a management decision. Also, please furnish us copies of any correspondence or directives issued related to the audit.

We provided a copy of this report to the City's Community Planning and Development (CPD) Director.

Should you or your staff have any questions, please contact me or Sonya D. Lucas, Assistant Regional Inspector General for Audit at (404) 331-3369.

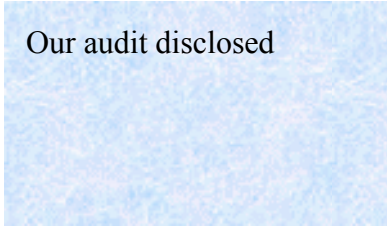


Executive Summary

We completed an audit of the City of Montgomery, Alabama, Community Development Block Grant (CDBG) activities related to the Madison Park sewer project. The audit was initiated in response to a Congressional request based on a citizen's complaint alleging misappropriated funds, suspected improprieties, and inadequate controls over the Madison Park project. Our objectives were to determine the validity of the complaint and whether the City complied with Federal laws, Department of Housing and Urban Development (HUD) regulations, and other requirements; and had adequate controls to assure effective and efficient administration of program funds related to this project. Our report contains two findings.

We determined the City did not: (1) act prudently in using CDBG funds for Madison Park; and (2) maintain adequate records on CDBG activities for Madison Park.





Our audit disclosed

The City did not use its CDBG funds prudently for the Madison Park Community. The City did not connect 25 residences to sewer facilities after it spent over \$700,000 to do so. The City's former management elected to reprogram funds, in part, due to concerns that sufficient funds were not available to complete sewer connections for all residents. In addition, the City and residents had previously requested CDBG funding be provided for a community center. The City purchased the land and began planning work on the center, but stopped when it realized the center would also require sewer connections. Planning and funding for the Madison Park Community was not prudent; consequently, neither project was completed. Because the City did not provide residents needed sanitary sewer connections, they remained in an unsuitable living environment.

The City did not maintain adequate records to support ongoing activities at the Madison Park Community. The City did not document project and national objective eligibility or citizen participation. In some instances, records were not centralized or could not be readily located. Therefore, the City could not provide an adequate audit trail or history for Madison Park CDBG activities. These conditions existed because the City's former management did not establish controls to ensure that adequate documentation was maintained. As a result, it diminished the City's ability to effectively manage its program and ensure that grant requirements were achieved.

Recommendations

We recommend that you require the City to: (1) connect residents to existing sewer facilities in the Madison Park community and (2) establish an adequate archive and retrieval system to centralize records for CDBG files. We also recommend you require the City to implement basic controls to ensure its activities are in accordance with applicable HUD requirements.

We presented our findings to the City and HUD officials during the audit. We provided a copy of the draft report to the City and HUD's Alabama State Office on April 29, 2003, for their comments. We discussed the report with officials at the exit conference on May 13, 2003. The City's comments are summarized in the findings and included in their entirety as Appendix A.

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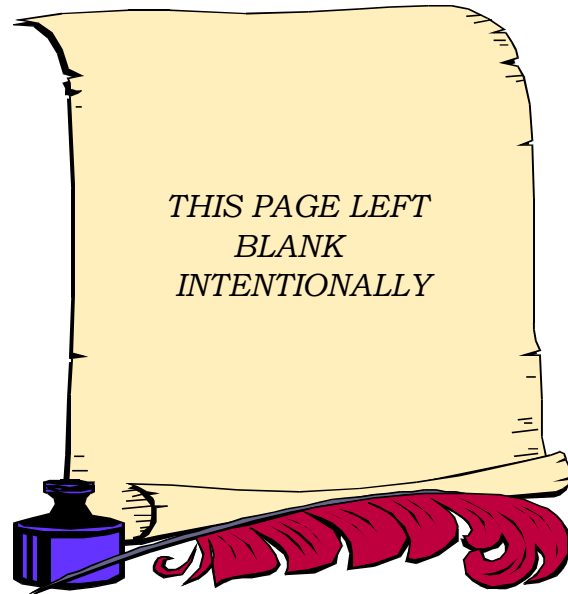
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Abbreviations

| | |
|------|--|
| CDBG | Community Development Block Grant |
| CFR | Code of Federal Regulations |
| CPD | Community Planning and Development |
| HUD | U.S. Department of Housing and Urban Development |
| OIG | Office of Inspector General |



Introduction

The CDBG Program was established by Title I of the Housing and Community Development Act of 1974 (Public Law 93-383). The program provides grants to State and local governments to aid in the development of viable urban communities. Governments are to use grant funds to provide decent housing and suitable living environments and to expand economic opportunities, principally for persons of low and moderate income. To be eligible for funding, every CDBG funded activity must meet one of the program's three national objectives. Every activity, except program administration and planning, must:

- Benefit low and moderate income persons; or
- Aid in preventing or eliminating slums or blight; or
- Address a need with a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community.

The City's Department of Community Planning and Development administers its CPD Programs. From 1995 to 2002, the City's CDBG funding averaged about \$2.9 million annually. All funding from 1995 through 2000 had been expended.

The City of Montgomery is governed under an elected Mayor-Council form of government. A Director of Planning and Development has overall responsibility for the City's HUD entitlement Programs. A Grant Administrator, who reports to the Director, administers the City's CPD Programs. The current Director and Administrator began their employment in August and October 2002, respectively, subsequent to the issues raised in the complaint. The City's books and records are maintained at City Hall, 103 North Perry Street, Montgomery, Alabama.

HUD's Alabama State Office of Community Planning and Development in Birmingham, Alabama, is responsible for overseeing the City's administration of these programs.

Audit Objectives

Our objectives were to determine the validity of the complaint and whether the City complied with Federal laws, HUD regulations, and other requirements; and had adequate controls to assure effective and efficient administration of program funds related to this project.

Audit Scope and Methodology

To accomplish the objective, we tested for compliance with program regulations and requirements for the Madison Park project. We also tested the City's established controls for effective and efficient administration of program funds. We reviewed the allegations of various complaint letters, HUD files, regulations governing the programs, and City policies and procedures. We also reviewed files, including those of the Water Works and Sanitary Sewer Board, related to the eligibility and use of HUD program funds;

Council minutes and Water Works and Sanitary Sewer Board minutes; pertinent newspaper articles; and, reports from independent public accountants.

We interviewed HUD officials; City staff; Water Works and Sanitary Sewer Board staff; complainants; and Madison Park Neighborhood Association representatives. We also made site visits to the Madison Park Community.

Our review covered the period May 1995 through October 2002. We extended the period as necessary. We performed our on-site work between October and December 2002. We conducted our audit in accordance with generally accepted government auditing standards.

The City Did Not Use CDBG Funds Prudently for Madison Park

The City did not use its CDBG funds prudently for the Madison Park Community. The City did not connect 25 residences to sewer facilities after it spent over \$700,000 to do so. The City’s former management elected to reprogram funds, in part, due to concerns that sufficient funds were not available to complete sewer connections for all residents. In addition, the City and residents had previously requested CDBG funding be provided for a community center. The City purchased the land and began planning work on the center, but stopped when it realized the center would also require sewer connections. Planning and funding for the Madison Park Community was not prudent; consequently, neither project was completed. Because the City did not provide residents needed sanitary sewer connections, they remained in an unsuitable living environment.

Criteria

Title 24 of the Code of Federal Regulations (CFR), part 570.502 of the CDBG regulations requires each grantee to implement a financial management system in conformity with 24 CFR 85, Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments. Title 24 CFR 85 requires that financial management systems effectively account for and control the use of program funds and other assets.

Background

The Madison Park area surrounds a business district and main thoroughfare, which increased the need to provide sewer services to the community. In response to the need, the City and three area contractors agreed to provide funding for a sewer lift station and lateral connections to serve the Madison Park area, south of the CSX railroad. A combined total of \$1.35 million was spent to construct the needed sewer facilities. Of the \$1.35 million, the City pledged \$350,000 from CDBG funds and \$500,000 from a bond issue, with the Water Works and Sewer Sanitary Board providing oversight. Area contractors made financial agreements directly with the Water Works and Sanitary Sewer Board to reimburse payments in installments, plus interest, once connected to the lift station. The City reallocated \$59,378 from the original pledged amount, making their contributions total \$790,622.

In August 1997, the Water Works and Sanitary Sewer Board entered into contractual agreements to install a gravity main, force main, and lift station to transport sewage for the Madison Park area. The sewer construction was divided into two phases: Phase I involved constructing a sewer lift station and lateral connections and Phase II involved stubbing out and connecting residents to the new sewer lines.

The City did not act prudently

The City provided \$350,000 of CDBG funds toward the completion of Phase I, with \$500,000 in bond proceeds earmarked for Phase II. After spending about \$440,000 during Phase II, the City withdrew the remaining \$60,000 before all residents were connected to the sewer lines. Nine residents were connected while 25 others were only stubbed for future connection.

During our site visit to the Madison Park Community, we observed homes with broken septic tanks and dilapidated outhouses or portable toilets. The Water Works and Sanitary Sewer Board officials stated that most of the current septic tanks were not working; therefore, residents were living in unsuitable conditions with standing sewage. The City's act of withdrawing funds was not prudent considering the small percentage of residents connected, the living conditions of the residents not connected, and the amount of funds expended for the newly constructed sewer system. As a result, many residents continued using unsanitary facilities when access to a functional sewer system was available.

These actions occurred, in part, because the City's former management elected to reprogram funds toward other activities, due to concerns that funding would not be sufficient to connect all residents. However, there was no evidence the City performed a feasibility analysis or consulted the Water Works and Sanitary Sewer Board before withdrawing funds. Per Water Works and Sanitary Sewer Board officials, the sewer connection was \$660 per household. Therefore, connecting the remaining 25 residents would have cost \$16,500 (\$660 X 25 residential households).

Based on HUD's Integrated Disbursement and Information System, Madison Park had a budget of \$245,688 to develop a community center. The City only expended one percent of the funding. The remaining funds were available for reallocation to complete the remaining lateral connections. With more than \$59,000 left over from the bond proceeds and funds available from other projects, the City had more than enough money to connect the remaining 25 residents. We could not determine a reasonable explanation for the City reallocating funds from the original budget or not reprogramming funds from idle projects toward sewer connections. The records provided by the current administration concerning the \$59,378 withdrawal did not reveal the destination of those funds.

The City and Madison Park residents wanted funding for a Community Center, which the City earmarked in prior CDBG budgets. When the City reprogrammed a percentage of those funds to construct the sewer facilities, the Madison Park Neighborhood Association blamed the City for undermining the community and using funds allocated toward the Community Center for purposes not approved or requested by the affected area. The City did not perform a needs assessment to determine the need for a Community Center versus continuing to connect residents to the sewer system. Instead, it simply reprogrammed sewer connection funding in order to satisfy the Madison Park Neighborhood Association. It did so without considering that the allotted area for the future Community Center did not have necessary sewer facilities either. The sequence for funding these activities was poorly planned considering both projects would ultimately need sewer services.

The current administration had made significant strides to complete the lateral sewer connections in Madison Park. Improvements included: updating Madison Park residents on the City's plans for lateral connections; assembling a project team to obtain authorizations, and verify income and addresses for low-to-moderate residents; and ultimately completing lateral connections. Based on the above status, anticipated completion should occur in the Summer of 2003. Until that occurs, residents are without needed

sanitary sewer connections and remain in unsuitable living environments.

Auditee Comments

Excerpts from the City’s comments on our draft finding follow. Appendix A contains the complete text of the comments.

“As part of its budget allocation process during PY 2002, the City of Montgomery reallocated the remaining \$151,275.03 in CDBG funding for the Madison Park community center project to the Madison Park sewer project (“Project”). In addition, the City also reallocated an additional \$200,000 in CDBG funds remaining from incomplete or cancelled projects to the Project. All reallocated CDBG funds (a total of \$351,275.03) were earmarked for the connection of low-to-moderate income residents to existing sewer facilities.

“... the City has taken a number of actions designed to result in the completion of the connections....

“...work has begun on the installation and connection of sewer lines in the area of Madison Park north of the CSX railroad. Staff will monitor this project for the timeliness and completion, and ensure that all residents targeted to be served are indeed connected.

“The City has met, on numerous occasions, with Madison Park residents, the City Council District Representative, and one of the State Legislators to review the history of both the sewer and community center projects, provide updates, and gather input from the residents. All input received will be included in the City’s plans for further development of the area.”

OIG Evaluation of
Auditee Comments

The City agreed with the finding. We believe the City’s actions will correct the deficiencies.



Recommendations

We recommend that you require the City to:

- 1A. Connect residents to the existing sewer facilities in Madison Park.
- 1B. Provide a detailed plan and timetable for connecting residents.
- 1C. Improve its planning and needs assessments to ensure CDBG funds are used efficiently and effectively.



The City Did Not Maintain Adequate Records for Madison Park CDBG Activities

The City did not maintain adequate records to support ongoing activities at the Madison Park Community. It did not document project and national objective eligibility or citizen participation. In some instances, records were not centralized or could not be readily located. Thus, the City could not provide an adequate audit trail or history for Madison Park CDBG activities. This condition existed because the City's former management did not establish controls to ensure that adequate documentation was maintained. As a result, it diminished the City's ability to effectively manage its program and ensure that grant requirements were achieved.

Title 24 CFR 570.506 requires CDBG recipients to maintain sufficient records to determine whether program requirements were met. Section (a) requires the recipient to maintain records that provide a full description of each activity assisted with CDBG funding, including its location, the amount of CDBG funds budgeted, obligated and expended for the activity, and eligibility determination. Section (b) requires that records should demonstrate that each activity undertaken meets one of the criteria for national objective requirements. Section (c) requires records that demonstrate the recipient eligibility determination for certain activities. Section (e) requires records to document citizen participation for each activity. Section (h) requires CDBG grantees to maintain evidence to support how funding allotted to recipients is expended. Such documentation includes invoices, schedules containing comparisons of budgeted amounts and actual expenditures, and construction progress schedules.

Background

The HUD Alabama State Office performed annual monitoring reviews of CDBG grantees to assure that activities adhered to applicable laws and regulations. From 1999 to 2002, the HUD Alabama State Office noted the City did not maintain sufficient files to support CDBG activities. HUD reported that files did not document programmatic and national objective eligibility, were incomplete, and were not centralized. The City's former management did not establish such controls, resulting in limited files for the Madison Park CDBG activities. However, we were able to determine the eligibility of Madison Park activities from HUD files and files maintained by the City's Water Works and Sanitary Sewer Board.

City needed to improve record maintenance

The City did not maintain relevant documents and information to support its Madison Park CDBG activities. We requested Madison Park CDBG records during our audit; however, the Grants Coordinator stated that the City's former management maintained haphazard files and loose documents in boxes. In fact, the City staff had to recreate files to provide HUD its Consolidated Annual Performance and Evaluation Review, its annual Action Plan, and to support unexpended CDBG funds.

Based on files provided, the City had not maintained essential documentation to support national and program requirements or citizen participation. Certain records were not timely located because the City had not maintained adequate files for archived records. In some instances, files were in various locations or in an abandoned auditorium. The deficiencies occurred because the City did not have procedures requiring a centralized record system

During our audit, the current Grants Coordinator started correcting the noted deficiencies. She established procedures to maintain six essential files for each subrecipient, including project eligibility (applicable page of the Action Plan with the national criteria or applicable eligibility); project summary (including program year, name, project location, project amount, brief description, etc.); project proposal (subrecipient proposal for grant funding); subrecipient agreement (signed); environmental review; and correspondence (including verbal instructions and directions that should be confirmed in writing). After the procedures were established, we noted some of the newly created files for Madison Park did not contain appropriate documentation. For instance, the project eligibility, environmental review, and subrecipient agreement files were empty. We believe the new procedures could resolve future file deficiencies, if properly administered.

Auditee Comments

Excerpts from the City's comments on our draft finding follow. Appendix A contains the complete text of the comments.

“The City established a central file, beginning with its PY 2002 projects, for its CDBG program. Files are grouped by project year, and file drawers are labeled accordingly. On open projects implemented prior to PY 2002, staff has attempted to locate any existing paperwork and documentation in order to group and file these projects as well....”

OIG Evaluation of
Auditee Comments

The City agreed with the finding. We believe the City’s actions will correct the deficiencies.

Recommendations

We recommend that you require the City to:

- 2A. Ensure established management controls are fully implemented to maintain adequate records.
- 2B. Establish an archive and retrieval system to centralize records for its CDBG files.



Management Controls

In planning and performing our audit, we considered the City of Montgomery's management controls to determine our audit procedures, but not to provide assurance on these controls. Management is responsible for establishing effective management controls to ensure that goals are met. Management controls include the plan of organization, methods, and procedures adopted by management to ensure that its goals are met. Management controls include the processes for planning, organizing, directing, and controlling program operations. They include the systems for measuring, reporting, and monitoring program performance.



Relevant Management Controls

We determined the following management controls were relevant to our audit objectives:

We assessed the relevant controls identified above.

- Program Operations – Policies and procedures that management has implemented to reasonably ensure that a program meets its objectives.
- Validity and Reliability of Data – Policies and procedures that management has implemented to reasonably ensure that valid and reliable data are obtained, maintained, and fairly disclosed in reports.
- Compliance with Laws and Regulations – Policies and procedures that management has implemented to reasonably ensure that resource use is consistent with laws and regulations.
- Safeguarding Resources – Policies and procedures that management has implemented to reasonably ensure that resources are safeguarded against waste, loss and misuse. This is a primary management concern.

Assessment Procedures

We assessed the relevant controls identified above by:

Reviewing allegations in complaint letters;

Reviewing HUD files;

Reviewing regulations governing the program(s) and City policies and procedures;

Interviewing HUD officials, City staff, Water Works and Sanitary Sewer Board staff, complainants, and Madison Park Neighborhood Association Representatives;

Reviewing financial management controls and controls over the overall management systems;

Reviewing files, including those of Water Works and Sanitary Sewer Board, related to the eligibility and use of HUD program funds;

Reviewing Council minutes and Water Works and Sanitary Sewer Board minutes;

Analyzing reports from independent public accountants;

Reviewing pertinent newspaper articles; and,

Making site visits to the Madison Park Community.

Significant Weaknesses

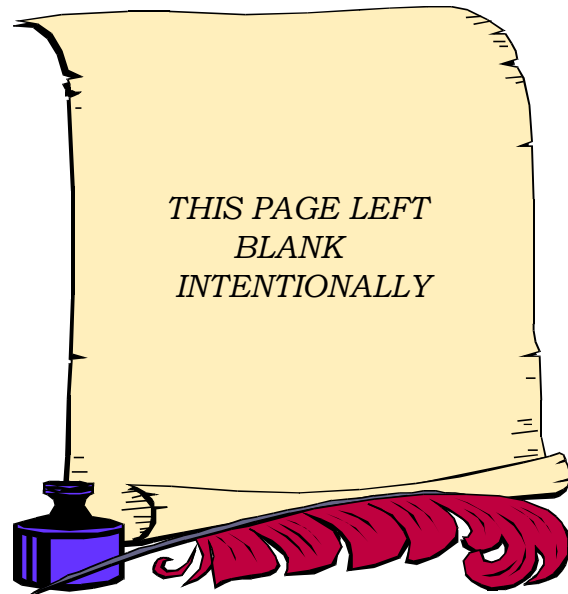
A significant weakness exists if management controls do not provide reasonable assurance that resource use is consistent with laws, regulations, and policies; that resources are safeguarded against waste, loss, and misuse; and, that reliable data are obtained, maintained, and fairly disclosed in reports.

Based on our audit, we identified significant weaknesses in all relevant control areas. See Findings 1 and 2.

Follow-Up On Prior Audits

This is the first Office of Inspector General audit of the City of Montgomery's CDBG Program.

Carr, Riggs, and Ingram, L.L.P., completed the most recent Independent Auditor audit report for the 12-month period ended September 30, 2001. The report did not contain any findings pertaining to the CDBG Program.





City of Montgomery, Alabama

BOBBY N. BRIGHT
Mayor

MONTGOMERY CITY COUNCIL
MRS. ALICE D. REYNOLDS-Pres.
JAMES A. NUCKLES-Pres. Pro tem
WILLIE COOK
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TRACY LARKIN
B. J. (BEN) MCNEILL
P. E. (PEP) PILGREEN
CHARLES W. SMITH

May 12, 2003

Nancy H. Cooper
Regional Inspector General for Audit
U.S. Department of HUD
Office of Audit, ox 42
Richard B. Russell Federal Building
75 Spring Street, SW, Room 330
Atlanta, GA 30303-3388

Dear Ms. Cooper:

We have reviewed the audit of the City of Montgomery's Madison Park sewer project conducted by your office. Below are our comments.

We suggest that the third paragraph under the "Introduction" read as follows: "The City of Montgomery is governed under an elected Mayor-Council form of government. A Director of Planning and Development has overall responsibility for the City's HUD entitlement program. A Grants Administrator, who reports to the Director, administers the City's CPD Programs. The current Director and Administrator began their employment in August and October 2002, respectively, subsequent to the issues raised in the complaint. The City's books and records were maintained at City Hall, 103 North Perry Street, Montgomery, Alabama."

We also offer the following responses to specific recommendations in the report:

Recommendation

- 1A. Allocate funds to connect residents to the existing sewer facilities. Such connections should be made with CDBG funds if the residents are low and moderate-income individuals. Otherwise, the City should pursue collection of appropriate connection fees.

Response

As part of its budget allocation process during PY 2002, the City of Montgomery reallocated the remaining \$151,275.03 in CDBG funding for the Madison Park community center project to the Madison Park sewer project ("Project"). In addition, the City also reallocated an additional \$200,000 in CDBG funds remaining from incomplete or cancelled projects to the Project. All reallocated

CDBG funds (a total of \$351,275.03) were earmarked for the connection of low-to-moderate income residents to existing sewer facilities.

Recommendation

1B. Provide a detailed plan and timetable for connecting residents.

Response

Since February 2003 the City has taken a number of actions designed to result in the completion of the connections. Those actions, and the results to date, follow:

1. The City met with the Montgomery Water Works and Sanitary Sewer Board ("Board") to identify those residential sites within Madison Park on which laterals had been installed and stubbed.
2. The Board agreed to assume responsibility for collecting estimates from plumbers to connect existing lines to the homes.
3. The City combined a project explanatory letter, an income documentation form, and a billing authorization form into a package for distribution to Madison Park residents.
4. Community Development staff members placed packages in the hands of all residents they could locate, and left packages at the doors of those residents who were not home. All except two of the residents have returned the paperwork, and staff is pursuing collection of the last two sets of documents.
5. To date, staff has identified only one resident who is not income-eligible for connection with CDBG funds. That resident has been notified of her ineligibility, and she has been offered the option of contracting with the Board directly to pay for connection to the system.

The remaining steps to complete the project are listed in the attached "Action Plan and Timetable". It should be noted that, during the data collection process, it was determined that there are approximately four new sites which have no lines. Upon the advice of the Board, the City will have its Engineering Department design a plan for the missing lines and connection to such. The City will then proceed to complete this phase of the Project with the assistance of the Board.

Finally, it should be noted that work has begun on the installation and connection of sewer lines in the area of Madison Park north of the CSX railroad. Staff will monitor this project for timeliness and completion, and ensure that all residents targeted to be served are indeed connected.

Recommendation

- 1C. Improve its planning and needs assessments to ensure CDBG funds are used efficiently and effectively.

Response

The City has met, on numerous occasions, with Madison Park residents, the City Council District Representative, and one of the State Legislators to review the history of both the sewer and community center projects, provide updates, and gather input from the residents. All input received will be included in the City's plans for further development of the area.

In addition, during PY 2002 the City allocated \$100,000 in CDBG funds for a "Comprehensive Neighborhood Planning Studies" project; it subsequently reallocated an additional \$94,272 in unused CDBG funds for the same purpose. Madison Park is the first neighborhood chosen for this project, and meetings have already begun with residents as part of a process to construct a long-range strategic plan for the area. This project is under the direct guidance of the City's Planning and Development Director, who is the first professional planner the City has ever hired.

Recommendations

- 2A. Ensure established management controls are fully implemented to maintain adequate records.
- 2B. Establish an archive and retrieval system to centralize records for its CDBG files.

Response

The City established a central file, beginning with its PY 2002 projects, for its CDBG program. Files are grouped by project year, and file drawers are labeled accordingly. On open projects implemented prior to PY 2002, staff has attempted to locate any existing paperwork and documentation in order to group and file these projects as well.

All CDBG files are required to include, at a minimum, the following sub-folders:

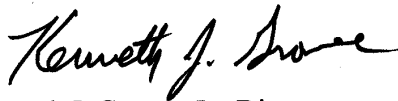
- Project Eligibility
- Project Summary
- Project Proposal
- Subrecipient Agreement
- Environmental Review
- Correspondence

Staff is required to confirm the correct national criterion to be met by each project and to place confirmation documentation of such in the "Project Eligibility" sub-folder. This ensures that project activities have been checked and verified to be in accordance with applicable HUD requirements. With respect to the Project file, the few pieces of available documentation have been gathered and placed in the proper sub-folders. Missing elements have been or are being located, updated, and properly filed. Please note that City-administered projects do not require subrecipient agreements.

By grouping files according to project years and accurately labeling file drawers, the City expects that archival and retrieval problems will no longer exist. Additional storage space will be identified and acquired as needed, and staff will maintain a log of archived files.

Please be assured that the City of Montgomery is fully committed to seeing this Project through to the end. We hope that your staff will return to our city in the fall of this year to inspect the results and to visit once more with the residents of Madison Park.

Sincerely,



Kenneth J. Groves, Jr., Director
Planning and Development Department



City of Montgomery, Alabama

BOBBY N. BRIGHT
Mayor

MONTGOMERY CITY COUNCIL
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P. E. (PEP) PILGREEN
CHARLES W. SMITH

MADISON PARK SEWER PROJECT ACTION PLAN and TIMETABLE

| Action | Responsibility | Date (2003) |
|---|----------------|----------------|
| Complete collection of all documentation from residents | CD | May |
| Notify Board of City's readiness to proceed | CD | May |
| Obtain estimates from plumbers | Board | May-June |
| Review estimates and choose plumber | Board, CD | June |
| Issue "Order to Proceed" to plumber | Board | June |
| Install connections | Plumbers | June-September |
| Monitor project progress | CD | June-September |
| Inspect and approve completed connections | Board | June-September |
| Authorize payments to plumber | CD | June-September |
| Survey residents to ensure project satisfaction | CD | September |
| Close project | CD | September |