

CDBG-DR Allocation Announcement Notice (AAN) & the Consolidated Notice

2020 and 2021
CDBG-DR Notice Overview



2022 CDBG DR Consolidated Notice Training Series



Presenters

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Presenters

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Agenda


1. What is the Consolidated Notice & AAN
2. 2020 and 2021 Allocations
3. Action Plan Process for New CDBG-DR Grantees for Disasters occurring in 2021
4. Substantial Action Plan Amendment Process for Existing Grantees for Disasters occurring in 2020 and 2021
5. Allocations of CDBG-DR Funds for Smaller Grants



Agenda cont.

6. Modifications of the February 3, 2022 notice (87 FR 6364)
7. Allocation Announcement Notice (AAN) Specifics
8. Action Plan Requirements
9. Trainings & Guidance from HUD





What is the AAN & the Consolidated Notice?

Presenter:
Jen Carpenter



What is the AAN and what is the Consolidated Notice?

- The AAN publishes the CDBG-DR allocations for disasters occurring in 2020 and 2021 and includes waivers and alternative requirements specific to the Appropriations Act (Pub. L. 117-43) that allocated the funding.
- The Consolidated Notice combines and updates requirements from several different *Federal Register* notices and CPD Notices that have governed CDBG-DR funds in the past.



What is the AAN and what is the Consolidated Notice?

- Two Allocation Announcement Notices published for 2020 and 2021 CDBG-DR Grantees:
 - February 3, 2022 at ([87 FR 6364](#))
 - May 24, 2022 at ([87 FR 31636](#))



How to read the AAN and the Consolidated Notice

- The Allocation Announcement Notice (AAN) makes up section I. through VII. of the Federal Register Notice.
- As always, you will see the Allocation Methodology included in the notice as Appendix A.
- And the Consolidated Notice is located in Appendix B.

Table of Contents

I. Allocations

II. Use of Funds

A. Action Plan Process for New CDBG-DR Grantees Under the Appropriations Act (Pub. L. 117-43) for Disasters occurring in 2021

B. Substantial Action Plan Amendment Process for Existing Grantees Under the Appropriations Act (Pub. L. 117-43) for Disasters occurring in 2020 and 2021

C. Allocations of CDBG-DR Funds for Smaller Grants.

D. Modifications of the February 3, 2022 notice (87 FR 6364)

III. Overview of Grant Process

A. Requirements Related to Administrative Funds

IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements

A. Grant Administration

V. Duration of Funding

VI. Catalog of Federal Domestic Assistance

VII. Finding of No Significant Impact

Appendix A: Allocation Methodology

Appendix B: CDBG-DR Consolidated Notice



Applicability of Federal Register Notices

- *For 2021 Disasters:* Grantees that are receiving funds for 2021 disasters only are subject to the requirements of [this](#) Allocation Announcement Notice and the Consolidated Notice, included as Appendix B, as amended.
- *For 2020 Disasters:* Grantees that are receiving funds for 2020 disasters and 2021 disasters are subject to the requirements of [this](#) Allocation Announcement Notice, the February 3, 2022 notice (87 FR 6364), as amended in section II.D. of this notice, and the Consolidated Notice, included as Appendix B, as amended.





2020 and 2021 Allocations



2020 and 2021 Allocations

- Public Law 117-43, approved September 30, 2021, (the “Appropriations Act”) makes available \$5,000,000,000 in CDBG-DR funds. These CDBG-DR funds are for necessary expenses for activities related to disaster relief resulting from a qualifying major disaster in 2020 or 2021.
- In October 2021, HUD allocated \$2,051,217,000 to assist in long-term recovery from disasters occurring in 2020.
- In March 2022, HUD allocated an additional \$722,688,000 in CDBG-DR funds for disasters occurring in 2020 and \$2,213,595,000 in CDBG-DR funds for disasters occurring in 2021.
- Allocations for 2020 and 2021 disasters are highlighted on tables in the 3 slides.



State	Grantee	Total allocated under from Pub. L. 117-43 for 2020	Total allocated under from Pub. L. 117-43 for 2021
Alabama	State of Alabama	\$501,252,000	\$0
California	State of California	\$231,203,000	\$14,761,000
Colorado	State of Colorado	\$0	\$7,415,000
Florida	State of Florida	\$187,383,000	\$0
Iowa	State of Iowa	\$57,566,000	\$0
Kentucky	State of Kentucky	\$0	\$74,953,000
Louisiana	State of Louisiana	\$1,050,267,000	\$1,272,346,000
Louisiana	Baton Rouge	\$0	\$4,648,000
Louisiana	Lake Charles	\$0	\$10,776,000
Michigan	State of Michigan	\$59,898,000	\$12,033,000

State	Grantee	Total allocated under from Pub. L. 117-43 for 2020	Total allocated under from Pub. L. 117-43 for 2021
Michigan	Dearborn	\$0	\$16,332,000
Michigan	Detroit	\$0	\$57,591,000
Mississippi	State of Mississippi	\$0	\$8,406,000
New Jersey	State of New Jersey	\$0	\$228,346,000
New York	State of New York	\$0	\$41,262,000
New York	New York City	\$0	\$187,973,000
North Carolina	State of North Carolina	\$0	\$7,975,000
Oregon	State of Oregon	\$422,286,000	\$0
Pennsylvania	State of Pennsylvania	\$0	\$23,152,000
Pennsylvania	Philadelphia	\$0	\$98,701,000

State		Grantee	Total allocated under from Pub. L. 117-43 for 2020	Total allocated under from Pub. L. 117-43 for 2021
Puerto Rico		Commonwealth of Puerto Rico	\$184,626,000	\$0
Tennessee		State of Tennessee	\$42,740,000	\$25,403,000
Tennessee		Nashville-Davidson	\$0	\$5,151,000
Texas		State of Texas	\$0	\$26,387,000
Texas		Dallas	\$0	\$24,433,000
Texas		Fort Worth	\$0	\$16,614,000
Texas		Houston	\$0	\$30,296,000
Washington		State of Washington	\$0	\$18,641,000

Action Plan Process for New CDBG-DR Grantees for Disasters occurring in 2021

Presenter:
Jen Carpenter



Applicability

- This section applies to CDBG-DR grantees that received allocations announced in [this](#) notice for disasters occurring in 2021 and that did not receive allocations announced in the February 3, 2022 notice.
- These grantee include State of Colorado; State of Kentucky; Lake Charles, LA; Baton Rouge, LA; Detroit, MI; Dearborn, MI; State of North Carolina; State of New Jersey; New York City, NY; State of New York; Philadelphia, PA; State of Pennsylvania; Nashville-Davidson, TN; Houston, TX; Dallas, TX; Fort Worth, TX; State of Texas; and the State of Washington.



Action Plan Requirements

- Grantees listed in the prior slide must submit an action plan that addresses unmet recovery needs and mitigation activities related to the disasters identified in the tables in the notice (Table 3) (**87 FR 31638**)
- Recommend that those grantees, move to Appendix B and read the requirements in the Consolidated Notice first, then go back and review the appropriate sections of the AAN, which include:
 - III.A.1. Action plan submittal for program administrative costs
 - III.A.2. Use of administrative funds across multiple grants
 - IV.A.1. Duplication of Benefits (DOB)
 - IV.A.2. CDBG-DR mitigation set-aside
 - IV.A.3. Interchangeability of disaster funds




Deadlines to Remember (New Grantees)

Action	Date
Federal Register Published (87 FR 31636)	May 24, 2022
Federal Register Applicability Date	May 31, 2022
Financial and Grant Management Certification Checklist	July 30, 2022 (60 days)
Implementation Plan and Public Action Plan in DRGR	September 28, 2022 (120 days)

*Grantees may request an extension of the Action Plan due date with good cause.





Substantial Action Plan Amendment Process for Existing Grantees for Disasters occurring in 2020 and 2021

Presenter:
Jen Carpenter



Applicability

- This section applies to CDBG-DR grantees that received allocations announced in [this](#) notice for disasters occurring in 2020 or 2021 and also allocations announced in the February 3, 2022 notice.
- These grantee include State of Alabama; State of California; State of Florida; State of Iowa; State of Louisiana; State of Michigan; State of Mississippi; and the State of Tennessee.



One Action Plan vs. Substantial Amendment Options

- Grantees identified in this section have two options:
 1. Choose to submit a substantial amendment to the Public Action Plan that was submitted and approved by HUD in response to the February 3, 2022 notice; or
 2. Wait to submit one Public Action Plan that includes all allocations announced in the February 3, 2022 notice and this notice (this assumes the grantee has not already submitted its Public Action Plan for HUD's review).

NOTE: When a Public Action Plan describes the use of CDBG-DR allocations for disasters occurring in both 2020 and 2021, HUD will make two grants, one for 2020 disasters and one for 2021 disasters, and each grant will have separate purposes and financial controls.



Action Plan Submission Options

- If a grantee chooses to include both the previous allocation announced in the February 3, 2022 notice and the allocation announced in this notice in the same Public Action Plan submission, the grantee will follow the required submission deadlines based on the applicability date of this notice.



Deadlines to Remember

(for grantees getting funds in both notices)

Action	Date
Federal Register Published (87 FR 31636)	May 24, 2022
Federal Register Applicability Date	May 31, 2022
	Submitted in response to the prior notice
Grantees must inform their grant manager what option they have chosen	June 30, 2022 (30 days later)
Substantial Amendment to the Public Action Plan submitted in DRGR	September 28, 2022 (120 days) OR 120 days after the initial action plan is approved, in whole or in part, by HUD (whichever is later)
One Public Action Plan* submitted in DRGR	September 28, 2022 (120 days)



Financial Management and Grant Compliance Certification Requirements and Implementation Plan Submissions

- The Consolidated Notice allows a grantee to rely on prior submissions “unless it has been more than three years since the executed grant agreement for the original CDBG-DR grant or a subsequent grant is equal to or greater than ten times the amount of the original CDBG-DR grant.”



Financial Management and Grant Compliance Certification Requirements and Implementation Plan Submissions

- No grantee receiving an allocation announcement under both this notice and the February 3, 2022 notice meets the three year or grant threshold criteria noted above.
- Therefore, the grantees covered by this section (State of Alabama; State of California; State of Florida; State of Iowa; State of Louisiana; State of Michigan; State of Mississippi; and the State of Tennessee) may rely on their prior submissions provided in response to the Financial Management and Grant Compliance Certification Requirements and the Implementation Plan in the Consolidated Notice.



Allocations of CDBG-DR Funds for Smaller Grants

Presenter:
Jen Carpenter



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Allocations of CDBG-DR Funds for Smaller Grants

- The Consolidated Notice requires that CDBG-DR action plans must demonstrate a reasonably proportionate allocation of resources relative to areas and categories (i.e., housing, economic revitalization, and infrastructure) of greatest needs identified in the grantee's impact and unmet needs assessment or provide an acceptable justification for a disproportional allocation.



Allocations of CDBG-DR Funds for Smaller Grants

- HUD recognizes that grantees receiving a relatively small allocation of funds for 2021 disasters in this notice may most effectively advance recovery by more narrowly targeting these limited recovery and mitigation resources.
- Accordingly, for grantees receiving an allocation of less than \$20 million for 2021 disaster(s) in this notice, HUD will consider the small size of the grant and HUD's allocation methodology as acceptable justification for a grantee to propose a disproportional allocation when the grantee is allocating funds to address unmet affordable rental housing needs caused by or exacerbated by the disaster(s).



Allocations of CDBG-DR Funds for Smaller Grants

- Grantees exercising this option must continue to comply with the applicable requirements of this notice and the Consolidated Notice, including the CDBG-DR mitigation set-aside requirement in section IV.A.4. of this notice.



Modifications of the February 3, 2022 notice (87 FR 6364)

Presenter:
Jen Carpenter



Modifications of the February 3, 2022 notice

- This section of the notice applies to CDBG-DR grantees announced in the February 3, 2022 notice (87 FR 6364) that received funding for a disaster occurring in 2020.
- HUD modified the February 3, 2022 notice:
 1. To be clear that the Appropriations Act requires HUD to include with any final allocation for the total estimate of unmet need an additional amount of 15 percent of that estimate for mitigation activities, and
 2. To include a technical correction to modify a waiver citation.





Allocation Announcement Notice (AAN) Specifics

Presenters: Mikayla Catani and
Jen Carpenter

III.A. Requirements Related to Administrative Funds

- The Appropriations Act allows grantees receiving an award under the 2020 and 2021 Allocation Announcement Notice to access funding for program administrative costs prior to the Secretary's certification of financial controls, procurement processes, and adequate procedures for proper grant management.
- If a grantee chooses to access funds for program administration before the certification, then the grantee must submit to HUD an Action Plan for Program Administrative Costs (PACs), outside of DRGR, describing the use of the funds.
 - This funding can pay for eligible program administrative costs (24 CFR 570.206), which Congress caps at 5% of the grant (plus 5% of program income generated by the grant)



III.A. Requirements Related to Administrative Funds

III.A.1. Action plan submittal for program administrative costs (87 FR 31641)

- Grantees can choose to submit an Action Plan for Program Administrative Costs (PACs)
- Tools Available Online Now:
 - [Optional Action Plan Template for Program Administrative Costs](#)
 - [HUD Review Checklist for the Action Plan for Program Administrative Costs](#)



III.A. Requirements Related to Administrative Funds, cont.

III.A.1. Action plan submittal for program administrative costs (87 FR 31641)

- *III.A.1.a. Publication of the action plan for program administrative costs and opportunity for public comment (87 FR 31641)*
 - 7-day comment period.
 - Must include prominent posting on the grantee's official disaster recovery website and must afford residents, affected local governments, and other interested parties a reasonable opportunity to review the contents of the plan.
- *III.A.1.b. Certifications waiver and alternative requirement (87 FR 31642)*
 - Subset of certification statements must be submitted (these are included in the optional template)



III.A. Requirements Related to Administrative Funds, cont.

III.A.1.c. Submission of the action plan for program administrative costs in DRGR (87 FR 31642)

- If a grantee receiving funds in both this notice and the February 3, 2022 notice has already received approval of the action plan for program administrative costs and received approval of the DRGR action plan for program administrative costs, the grantee may:
 - Submit an amendment to HUD of its action plan for program administrative costs to budget funds for additional administrative costs.
 - Grantees may do this by using the optional template. Grantees should just edit the previously submitted document with a new budget for PACs after following the required public comment period.



III.A. Requirements Related to Administrative Funds, cont.

III.A.2. Use of administrative funds across multiple grants (87 FR 31642)

- 2020 CDBG-DR grantees that have received CDBG-DR or CDBG-MIT grants in the past or who will receive funds in any future acts, may use eligible administrative funds (up to five percent of each grant award plus up to five percent of program income generated by the grant) for the cost of administering any CDBG-DR or CDBG-MIT grant without regard to the particular disaster appropriation from which such funds originated.



III.A. Requirements Related to Administrative Funds, cont.

III.A.2. Use of administrative funds across multiple grants (87 FR 31642)

- If the grantee chooses to exercise this authority, the grantee must:
 1. Have appropriate financial controls to make sure that no grant will exceed five percent of the total grant award for each grant (plus five percent of program income generated by the grant),
 2. Review and modify your financial management policies and procedures regarding the tracking and accounting of administration costs, and
 3. Address the adoption of this treatment in the applicable portions of its Financial Management and Grant Compliance submissions, as applicable.



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements

IV.A. Grant Administration (87 FR 31643)

IV.A.1. Duplication of Benefits (DOB)

- Grantees that received funds for 2020 disasters must follow the 2019 DOB Notice (84 FR 28836) and section IV.A. of the CDBG-DR Consolidated Notice
- Training: <https://www.hudexchange.info/trainings/courses/duplication-of-benefits-webinar-2019/2970/>



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

IV.A.2. CDBG-DR mitigation set-aside (87 FR 31643)

- 15 percent of funds received must be spent on mitigation activities in the MID areas (listed in Table 1 and Table 3 in the Notice)
- How does HUD define mitigation?
 - For purposes of grants under this notice, mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

Grantees must demonstrate that activities funded by the CDBG-DR mitigation set-aside:

1. Meet the definition of mitigation activities;
2. Address the current and future risks identified in mitigation needs assessment in the MID areas;
3. Are CDBG eligible activities under Title I of the HCDA or otherwise eligible through a waiver or alternative requirement; and
4. Meet a national objective.



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

- Grantees can choose two ways to meet the requirements of the CDBG-DR Mitigation Set-Aside:
 - 1.) Tie-back – include eligible recovery activities that have tie-back to the disaster and incorporate mitigation measures into the recovery activities; OR
 - 2.) No Tie-back – include activities that do not have tie-back to the disaster but are still eligible and incorporate mitigation measures.
- To count any activities towards the CDBG-DR Mitigation Set-Aside grantees must:
 1. Document how those activities and the incorporated mitigation measures will meet the definition of mitigation
 2. Report the activities as a "MIT" activity type in DRGR



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

- *IV.A.2.a. Mitigation needs assessment (87 FR 31643)*
 - Must conduct a mitigation needs assessment to inform the activities funded by the CDBG-DR mitigation set-aside - a risk-based assessment considering identified current and future risks (grantees must use risks identified in the current Hazard Mitigation Plan)
 - Grantees must assess their mitigation needs in a manner that effectively addresses risks to indispensable services that enable continuous operation of critical business and government functions and are critical to human health and safety or economic security.
 - Must cite data sources.



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

- *IV.A.2.b. Connection of programs and projects to the mitigation needs (87 FR 31643)*
 - There must be a clear connection between a grantee's mitigation needs assessment and its proposed activities in the MID areas funded by the CDBG-DR mitigation set-aside.
 - To maximize the impact of all available funds, grantees are encouraged to coordinate and align these funds with other projects funded with CDBG-DR and CDBG-MIT funds, as well as other disaster recovery activities funded by FEMA, USACE, the U.S. Forest Service, and other agencies as appropriate.



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

- *IV.A.3. Interchangeability of disaster funds (87 FR 31643)*
 - If the MID areas overlap, grantees may choose to use their 2020 and 2021 CDBG-DR grants or any future or prior allocation of CDBG-DR funds to address unmet needs of both disasters.
 - Grantees must follow the rules and requirements outlined in the *Federal Register* notice applicable to the funds (i.e., the rules follow the money)



IV. Applicable Rules, Statutes, Waivers, and Alternative Requirements, cont.

- *V. Duration of Funding (87 FR 31644)*
 - 6-year expenditure timeline.
 - Grantees may request an extension with good cause.



Action Plan Requirements

Presenter:
Mikayla Catani



2022 CDBG DR Consolidated Notice Training Series



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- Grantees must submit to HUD an action plan which will describe programs and activities that conform to applicable requirements as specified in the Consolidated Notice and the applicable AAN.
- *III.C.1. Action plan. (87 FR 31655)*
 - The action plan must identify the proposed use of all funds, including how the uses incorporate mitigation measures.
 - Grantees must use HUD's Public Action Plan in DRGR to develop all action plans and amendments.
 - [DRGR Grantee Public Action Training \(Pre-Recorded Training\)](#)
 - [DRGR Action Plan Webinar for Grantees \(Live Webinar\)](#)
 - NEW WEBINAR (Save the Date): DRGR Public Action Plan Training for Grantees – June 14, 2022 – 2:00 PM EDT



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*
 - a. *An impact and unmet needs assessment. (87 FR 31655)*
 - Grantees must develop an assessment to understand the type and location of community needs and to target limited resources to those areas with the greatest need.
 - Grantees must also take into account the costs of incorporating hazard mitigation measures to protect against the specific identified impacts of future extreme weather events and other natural hazards.
 - The analysis should factor in historical and projected data on risk that incorporates best available science.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*
 - b. Connection of programs and projects to unmet needs. (87 FR 31655)*
 - The plan must provide a clear connection between a grantee's impact and unmet needs assessment and its proposed programs and projects.
 - The grantee must demonstrate a **reasonably proportionate allocation** of resources relative to areas and categories (i.e., housing, economic revitalization, and infrastructure) of greatest needs identified in the assessment or provide an acceptable justification for a disproportional allocation.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*
 - c. *Public housing, affordable rental housing, and housing for vulnerable populations. (87 FR 31656)*
 - Each grantee must include a description of how it has analyzed, identified, and will address the unmet needs associated with the rehabilitation, reconstruction, and new construction of the following types of housing:
 - Public housing
 - Affordable rental housing (both subsidized and market rate)
 - Housing for vulnerable populations



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*

- d. *Fair housing, civil rights data, and advancing equity. (87 FR 31656)*

- The grantee must comply with its fair housing/nondiscrimination obligations and provide an assessment of:
 - whether its planned use of CDBG-DR funds will have an unjustified discriminatory effect on or fail to benefit racial and ethnic minorities in proportion to their communities' needs; and
 - how it will address the recovery needs of impacted individuals with disabilities.
 - Grantees should consider the impact of their planned use of CDBG-DR funds on protected class groups, vulnerable populations, and other historically underserved communities.
 - Grantees should identify the above populations (i.e., which protected classes, vulnerable populations, and historically underserved groups were considered) and how those groups can be expected to benefit from the activities set forth in the plan.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*

- d. *Fair housing, civil rights data, and advancing equity. (87 FR 31656)*

- Grantees must include data for the MID areas that identifies the following information, as it is available:
 - Racial and ethnic make-up of the population
 - Number and percentage of the following groups:
 - LEP populations (for each identified group);
 - persons with disabilities;
 - persons belonging to Federally protected classes under the Fair Housing Act and other vulnerable populations as determined by the grantee;
 - Indigenous populations and tribal communities (for each identified group)
 - Racially and ethnically concentrated areas and concentrated areas of poverty
 - Historically distressed and underserved communities
 - Grantees must explain how the use of funds will reduce barriers that individuals may face when enrolling in and accessing CDBG-DR assistance.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*

- d. Fair housing, civil rights data, and advancing equity. (87 FR 31656)*

- Grantees must also identify the proximity of natural hazards to affected populations in the MID area, including members of protected classes, vulnerable populations, and underserved communities, and explore how CDBG-DR activities may:
 - mitigate environmental concerns; and
 - increase resilience among these populations to protect against the effects of extreme weather events and other natural hazards.
 - Grantees must describe how their use of CDBG-DR funds is consistent with their obligation to affirmatively further fair housing.
 - Grantees are strongly encouraged to include examples of how their proposed allocations, selection criteria, and other actions can be expected to advance equity for protected class groups and for individuals with disabilities.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

Fair housing, civil rights data, and advancing equity

- Grantees should visit the **Citizen Participation & Equitable Engagement (CPEE) Toolkit** for additional resources when building out this section of their action plan.
- The toolkit can be found here: <https://www.hudexchange.info/programs/cdbg-dr/cpee-toolkit/introduction/>
- *Webinar conducted by HUD FHEO staff on these requirements*
 - Slides available here: <https://www.hudexchange.info/trainings/cdbg-dr-clinic/#fair-housing>
 - Recording coming shortly!



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.1. Action plan.*

- i. Resilience planning. (87 FR 31657)*

- The grantee's action plan must describe how the grantee will:
 - emphasize high quality design, durability, energy efficiency, sustainability, and mold resistance;
 - support adoption and enforcement of modern and/or resilient building codes (can use [FEMA's Nationwide Building Code Adoption Tracking \(BCAT\) portal](#));
 - fund feasible, cost-effective measures;
 - make land-use decisions that reflect responsible and safe standards; and
 - increase awareness of the hazards in their communities through outreach to the MID areas.
 - The plan must also include a description of how the grantee will promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, including climate-related natural hazards and the creation of resilience performance metrics.
 - Grantees must use their FEMA-approved Hazard Mitigation Plan (HMP), Community Wildfire Protection Plan (CWPP), or other resilience plans to inform the evaluation.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.2. Additional action plan requirements for states. (87 FR 31657)*
 - For state grantees, the action plan must describe how the grantee will distribute grant funds, either through:
 - specific programs and projects the grantee will carry out directly; or
 - a method of distribution of funds to local governments and Indian tribes.
 - For states using a method of distribution, if some required information is unknown when the grantee is submitting its action plan to HUD, the grantee must update the action plan through a substantial amendment once the information is known.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.3. Additional action plan requirements for local governments. (87 FR 31658)*
 - For local governments grantees, the action plan shall describe specific programs and/or activities they will carry out.
 - Grantees will also include all criteria used to select applications (including any priorities), including the relative importance of each criterion, and any eligibility requirements.
 - If the criteria are unknown when the grantee is submitting the initial action plan to HUD, the grantee must update the action plan through a substantial amendment once the information is known. The substantial amendment must be submitted and approved before selecting applications.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.6. Amending the action plan.*
 - a. *Substantial amendment. (87 FR 31659)*
 - In its action plan, each grantee must specify criteria for determining what changes in the grantee's plan constitute a substantial amendment to the plan.
 - At a minimum, the following modifications will constitute a substantial amendment:
 - a change in program benefit or eligibility criteria;
 - the addition or deletion of an activity;
 - **a proposed reduction in the overall benefit requirement;** or
 - the allocation or reallocation of a monetary threshold specified by the grantee in its action plan.
 - For all substantial amendments, the grantee must follow the same procedures required for the preparation and submission of an action plan, with the exception of the public hearing and consultation requirements.



III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

- *III.C.7. Projection of expenditures and outcomes. (87 FR 31659)*
 - Each grantee must submit projected expenditures and outcomes with the action plan.
 - The grantee will use DRGR's upload feature to include projections and accomplishments for each program created.
 - [DRGR Grantee Programs Projections Upload Templates Fact Sheet](#)
 - [DRGR Upload Template: Grantee Programs Expenditure Projections - Add and Edit \(GPExpenditureProjectionAddEdit.csv\)](#)
 - [DRGR Upload Template: Grantee Programs Outcome Projections - Add and Edit \(GPOutcomeProjectionAddEdit.csv\)](#)



Trainings & Guidance from HUD

Presenter:
Wareesha Tariq



2022 CDBG-DR Consolidated Notice Training Series

HUD TA & Guidance

- HUD has issued accompanying guidance to provide technical assistance and best practices for potential CDBG-DR grantees.
- This guidance provides potential CDBG-DR grantees and the public a thorough understanding on how to apply the provisions described in the Consolidated Notice.
- This guidance can be viewed on the “2020 and 2021 CDBG-DR Grantees” page on hud.gov:
https://www.hud.gov/program_offices/comm_planning/cdbg-dr/grantees



HUD TA & Guidance

- List of Trainings available on the “2020 and 2021 CDBG-DR Grantees” page:
 - [DRGR Grantee Public Action Training \(Pre-Recorded Training\)](#)
 - [AAN and the Consolidated Notice Overview](#)
 - [Climate Action, Advancing Equity, and Disaster Recovery: What's New in CDBG-DR](#)
 - [DRGR Action Plan Webinar for Grantees \(Live Webinar\)](#)
 - [Financial Management and Grant Compliance Certification Requirements](#)
 - [2020 CDBG-DR Notice Overview](#)



HUD TA & Guidance

- List of Fact Sheets available on the “2020 and 2021 CDBG-DR Grantees” page:
 - [Advancing Equity in CDBG-DR](#)
 - [CDBG-DR Mitigation Set-Aside](#)
 - [Climate Resilience and Disaster Recovery at HUD](#)
 - [URA, Section 104\(d\), and related CDBG Program Requirements](#)



HUD TA & Guidance

- List of Grantee Guidance and Checklists available on the “2020 and 2021 CDBG-DR Grantees” page:
 - *Materials Needed for CDBG-DR Grantee's Financial Management and Grant Compliance Certification Requirements:*
 - [Financial Management and Grant Compliance Certification Requirements for State Grantees 2020 and 2021 Disasters](#)
 - [Financial Management and Grant Compliance Certification Requirements for Local Grantees 2021 Disasters](#)
 - [Financial Management and Grant Compliance Certification Requirements HUD Review Checklist](#)



HUD TA & Guidance

- List of Grantee Guidance and Checklists available on the “2020 and 2021 CDBG-DR Grantees” page:
 - *Guidance and Materials related to the Disaster Recovery Grant Reporting System (DRGR):*
 - [DRGR Guidance for CDBG-DR Grantees under Public Law 117-43](#)
 - [DRGR Grantee Programs Projections Upload Templates Fact Sheet](#)
 - [DRGR Upload Template: Grantee Programs Expenditure Projections - Add and Edit \(GPExpenditureProjectionAddEdit.csv\)](#)
 - [DRGR Upload Template: Grantee Programs Outcome Projections - Add and Edit \(GPOutcomeProjectionAddEdit.csv\)](#)



HUD TA & Guidance

- List of Grantee Guidance and Checklists available on the “2020 and 2021 CDBG-DR Grantees” page:
 - *Materials related to the Implementation Plan, the Action Plan, and the Action Plan for Program Administrative Costs:*
 - [Optional Action Plan Template for Program Administrative Costs](#)
 - [HUD Review Checklist: Action Plan for Program Administrative Costs](#)
 - [CDBG-DR Implementation Plan HUD Review Checklist for 2020 Grantees](#)
 - [CDBG-DR Public Action Plan HUD Review Checklist for Grants Under Public Law 117-43](#)



We can help!

- DRSI is working with all new 2020 and 2021 CDBG-DR grantees to schedule HUD-led Launch TA visits (either virtual or in-person)
 - If you have not heard about this, please contact your Grant Manager to inquire about scheduling these sessions this summer (ideally before September 2022).
- DRSI can also assign a TA Provider that has been selected through a Notice of Funding Opportunity issued by CPD's Technical Assistance Division (TAD) to work with you through the Launch and Implementation of your program.



Questions?



Presenter: Clay Lloyd





Thank You!

If you have any questions, please feel free to send an email to DRSI's Policy Unit at DRSIPolicyUnit@hud.gov

