

**Community Development Block Grant Disaster Recovery (CDBG-DR)  
Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43) and  
Continuing Appropriations Act, 2023 (Pub. L. 117-180)  
Substantial Action Plan Amendment Review Checklist**

**Instructions:** HUD Reviewers should use this checklist for any Substantial Action Plan Amendments for funds from the Disaster Relief Supplemental Appropriations Act, 2020, Pub. L. 117-43 and/or the Continuing Appropriations Act, 2023 (Pub. L. 117-180) approved September 30, 2022. There are two types of Substantial Action Plan Amendments: 1) the incorporation of additional funds; or 2) a change in the action plan that meets the minimum criteria for a substantial amendment. These terms are described below:

- **Incorporation of Additional Funds:** An amendment that includes an additional allocation of funds for a disaster occurring in 2020 or 2021 and addresses the requirements of the *Federal Register* notices published on May 24, 2022 (87 FR 31636) and then January 18, 2023 (88 FR 3198), as described in section II.B.
- **Substantial Amendment Criteria:** An amendment that, at a minimum, indicates a change in program benefit or eligibility criteria; the addition or deletion of an activity; a proposed reduction in the overall benefit requirement, as outlined in III.F.2 of the Consolidated Notice; or the allocation or reallocation of a monetary threshold specified by the grantee in their action plan.

Most questions in this checklist are for amendments that meet the Substantial Amendment Criteria. However, if the purpose of a question is to evaluate the incorporation of the additional funds in the January 18, 2023 (88 FR 3198) and/or the May 24, 2022 notice (87 FR 31636) and the amendment you are reviewing is not an amendment to incorporate additional funds, the HUD Reviewer can select “N/A” and continue to the next question. HUD Reviewers can also select “N/A” when a question does not apply to the specific Substantial Action Plan Amendment. These questions will include a note stating that a “N/A” response is available to the HUD Reviewer.

Specifically, a HUD Reviewer should complete “Section F. – CDBG-DR Mitigation Set-Aside” if:

- The Substantial Action Plan Amendment is in response to the incorporation of additional funds, or
- There is a change in the use of the CDBG-DR mitigation set-aside that meets the Substantial Amendment Criteria.

If the amendment is for a different reason (e.g., a change in eligibility for a CDBG-DR program), the HUD Reviewer can select “N/A” for each question and continue to “Section G. – Conclusion.”

Complete the following information:

|   |  |  |  |
|---|--|--|--|
| <b>Grantee:</b>                                   |  | <b>Disaster(s) Year:</b>   |  |
| <b>Entity Designated to Administer the Funds:</b> |  | <b>Date Amended Plan Submitted:</b>  |  |
| <b>Amount of Funds Allocated in Plan:</b>         |  | <b>Date Amended Plan Reviewed:</b>   |  |
| <b>Reviewer/Title:</b>                            |  | <b>Submitted on the Due Date outlined in the <i>Federal Register</i> notice:</b> |  |

|   |  |
|---|--|
| <b>Describe basis for conclusion in a secondary review (HUD staff to note any deficiencies or items necessary for follow up):</b> |  |
|   |  |

**Section: Substantial Action Plan Amendment – A. General Requirements**

**Narrative:**

Does the Substantial Action Plan Amendment include the following information:

|    |       | <b>Questions:</b>  | <b>Notice Reference</b> | <b>HUD Reviewer Response</b><br>(Yes, No, or N/A (if allowable)) |
|----|-------|--|-------------------------|--|
| 1. | (1/1) | <p><b>INCORPORATION OF ADDITIONAL FUNDS</b> – Is this Substantial Action Plan Amendment in response to the additional allocation awarded in the <i>Federal Register</i> notice published on May 24, 2022 (87 FR 31636) and/or January 18, 2023 (88 FR 3198)?</p> <p>NOTE: If the Substantial Action Plan Amendment is not in response to an additional allocation (either for additional funds for a disaster occurring in 2020 or for a disaster occurring in 2021), the HUD Reviewer can select “N/A.”</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.C.1.                |  |
| 2. | (1/2) | <p><b>INCORPORATION OF ADDITIONAL FUNDS</b> – If the Substantial Action Plan Amendment is in response to the additional allocation awarded in the <i>Federal Register</i> notice published on May 24, 2022 (87 FR 31636) and/or January 18, 2023 (88 FR 3198), does the Substantial Action Plan Amendment identify the proposed use(s) of funds, including criteria for eligibility and how the uses address long-term recovery needs, restoration of infrastructure and housing, economic revitalization, and the incorporation of mitigation measures in the MID areas?</p>                              | III.C.1.                |  |

|    |       |   |          |  |
|----|-------|---|----------|--|
|    |       | <p>NOTE: If the Substantial Action Plan Amendment is not in response to an additional allocation (either for additional funds for a disaster occurring in 2020 or for a disaster occurring in 2021), the HUD Reviewer can select “N/A.”</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> |          |  |
| 3. | (2/1) | <p>ACTION PLAN – Does the Substantial Action Plan Amendment include a single chart or a table that clearly illustrates where funds are coming from and where they are moving to?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>        | III.C.1. |  |
| 4. | (2/2) | <p>ACTION PLAN – Does the Substantial Action Plan Amendment include a revised budget allocation table that reflects all funds?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.C.1. |  |
| 5. | (2/3) | <p>ACTION PLAN - Does the Substantial Action Plan Amendment include a section that identifies exactly what content is being added, deleted, or changed?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>   | III.C.1. |  |

|    |       |  |          |  |
|----|-------|--|----------|--|
| 6. | (2/4) | <p><b>ACTION PLAN</b> – Does the grantee describe the steps it followed to make the Action Plan, and the steps it will follow to make any substantial amendments, performance reports, and other relevant program materials, available in a form accessible to persons with disabilities?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.C.1. |  |
| 7. | (3/1) | <p><b>MOST IMPACTED AND DISTRESSED (MID) AREAS</b> – Does the Substantial Action Plan Amendment demonstrate that the grantee’s proposed activities are for costs related to unmet needs in the MID areas resulting from qualifying disasters?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 19</p>  | II.A.3.  |  |
| 8. | (3/2) | <p><b>MOST IMPACTED AND DISTRESSED (MID) AREAS</b> – Does the Substantial Action Plan Amendment demonstrate that at least 80 percent of the funds will be used in the HUD-identified MID areas, and no more than 20 percent will be spent in the grantee-identified MID areas?</p> <p>NOTE: Unless it is stated in the notice that a grantee must use 100% of the funds in the HUD -identified MID areas.</p> <p>NOTE: Both the HUD-identified MID areas and the minimum amount of funds that must be expended in the HUD-identified MID areas are identified in Table 2 of the <i>Federal Register</i> notices published on January 18, 2023 (88 FR 3198), and/or February 3, 2022 (87 FR 6364), and/or Tables 2 and 4 of the <i>Federal Register</i> notice published on May 24, 2022 (87 FR 31636).</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 19</p> | II.A.3.  |  |

|     |       |   |            |  |
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| 9.  | (4/1) | <p><b>NEEDS ASSESSMENT</b> – If the Substantial Action Plan Amendment includes any new projects or programs or removes any projects or programs from the prior submission, has the unmet needs assessment been updated to incorporate these needs?</p> <p>NOTE: The grantee must update the needs assessment in order to add or remove projects or programs.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.C.1.a. |  |
| 10. | (5/1) | <p><b>CONNECTION OF PROGRAMS AND PROJECTS TO UNMET NEEDS</b> – If the grantee updated the unmet needs assessment, does the assessment describe the connection between the grantee’s impact and unmet needs assessment and its proposed programs and projects in the MID areas (or outside in connection to the MID areas as described in Section II.A.3 of the Consolidated Notice)?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 4</p> | III.C.1.b. |  |
| 11. | (5/2) | <p><b>CONNECTION OF PROGRAMS AND PROJECTS TO UNMET NEEDS</b> – Does the connection between the identified unmet needs and the allocation of CDBG–DR resources provide for 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?</p>   | III.C.1.b  |  |

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|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 5  |            |  |
| 12. | (5/3) | <p>CONNECTION OF PROGRAMS AND PROJECTS TO UNMET NEEDS – If the grantee does not demonstrate a reasonably proportionate allocation of resources relative to area and categories in its updated unmet needs assessment, does the grantee provide an acceptable justification for a disproportional allocation?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 6</p> | III.C.1.b  |  |
| 13. | (5/4) | <p>CONNECTION OF PROGRAMS AND PROJECTS TO UNMET NEEDS – Does the grantee’s updated unmet needs assessment incorporate hazard mitigation measures designed to reduce the impacts of recurring natural disasters and the long-term impacts of climate change?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 7</p>  | III.C.1.b. |  |

**Section: Substantial Action Plan Amendment – B. Requirements for States ONLY**

**Narrative:**

Does the Substantial Action Plan Amendment include the following information:

|  |  |                   |                             |                                      |
|--|--|-------------------|-----------------------------|--------------------------------------|
|  |  | <b>Questions:</b> | <b>Notice<br/>Reference</b> | <b>HUD<br/>Reviewer<br/>Response</b> |
|--|--|-------------------|-----------------------------|--------------------------------------|

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|     |       |   |          | (Yes, No, or N/A (if allowable)) |
| 14. | (1/1) | <p>STATE GRANTEEES ONLY – Does the Substantial Action Plan Amendment describe the method of distribution of funds to UGLG's and/or the description of a new activity that the State will carry out directly?</p> <p>NOTE: A “No” response to questions in this section does not necessarily necessitate a rejection of the Public Action Plan. However, for states using a method of distribution, if some required information is unknown when the grantee is submitting its Action Plan to HUD (e.g., the list of programs or activities required by III.C.1.g. of the Consolidated Notice or the projected use of CDBG-DR funds by responsible entity as required by subparagraph (5) in this section), the grantee <u>must</u> update the Action Plan through a substantial amendment once the information is known. If necessary to comply with a statutory requirement that a grantee shall submit a plan detailing the proposed use of all funds prior to HUD’s obligation of grant funds, HUD may obligate only a portion of grant funds until the substantial amendment providing the required information is submitted and approved by HUD.</p> <p>An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.C.2. |                                  |
| 15. | (1/2) | <p>STATE GRANTEEES ONLY – Does the Substantial Action Plan Amendment describe how the impact and unmet needs assessment informed the allocation to the new project or program identified in the plan and the rationale behind the decision to provide funds to most impacted and distressed areas?</p> <p>NOTE: An N/A response here is available.</p>  | III.C.2. |                                  |



|     |       |   |          |  |
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|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 32   |          |  |
| 16. | (1/3) | <p>STATE GRANTEES ONLY – For <b>any new activity or program</b>, does the Substantial Action Plan Amendment describe all criteria used to allocate and award the funds, including the relative importance of each criterion when funds are subgranted to local governments or Indian tribes?</p> <p>NOTE: The substantial amendment must be submitted and approved before distributing the funds. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.C.2. |  |
| 17. | (1/4) | <p>STATE GRANTEES ONLY – For <b>any existing activity or program</b> that did not include the criteria to be used to allocate and award the funds, does the Substantial Action Plan Amendment describe all the criteria, including the relative importance of each criterion when funds are subgranted to local governments or Indian tribes?</p> <p>NOTE: The substantial amendment must be submitted and approved before distributing the funds. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.C.2. |  |
| 18. | (1/5) | STATE GRANTEES ONLY – Does the Substantial Action Plan Amendment describe how the distribution and selection criteria will address disaster-related unmet needs in a manner that does not have an unjustified discriminatory effect based on race or other  | III.C.2. |  |

|     |       |   |          |  |
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|     |       | <p>protected class and ensure the participation of minority residents and those belonging to other protected class groups in the MID areas?</p> <p>NOTE: This description should include an assessment of who may be expected to benefit, the timing of who will be prioritized, and the amount or proportion of benefits expected to be received by different communities or groups (e.g., the proportion of benefits going to different locations within the MID or to homeowners versus renters). An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> |          |  |
| 19. | (1/6) | <p>STATE GRANTEES ONLY– Does the Substantial Action Plan Amendment describe the threshold factors and recipient or beneficiary grant size limits that are to be applied?</p> <p>NOTE: The grantee shall describe the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs. The Initial Public Action Plan Review Checklist addresses this requirement in Section A., questions 43-45. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>                                    | III.C.2. |  |
| 20. | (1/7) | <p>STATE GRANTEES ONLY– Does the Substantial Action Plan Amendment describe the projected uses for the CDBG-DR funds, by responsible entity, activity, and geographic area?</p> <p>NOTE: An N/A response here is available.</p>   | III.C.2. |  |

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|     |        | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 32  |          |  |
| 21. | (1/8)  | <p>STATE GRANTEES ONLY– Does the Substantial Action Plan Amendment describe for each proposed program and/or activity, its respective CDBG activity eligibility category (or categories), national objective(s), and what disaster-related impact is addressed?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.C.2. |  |
| 22. | (1/9)  | <p>STATE GRANTEES ONLY – For <b>any new activity or program</b> to be carried out directly, does the Substantial Action Plan Amendment describe all criteria, including the relative importance of each criterion, and any eligibility requirements?</p> <p>NOTE: The substantial amendment must be submitted and approved before selecting applications. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.C.2. |  |
| 23. | (1/10) | <p>STATE GRANTEES ONLY – For <b>any existing activity or program</b> to be carried out directly that did not include the criteria to be used to select applications, does the Substantial Action Plan Amendment describe all criteria, including the relative importance of each criterion, and any eligibility requirements?</p>  | III.C.2. |  |

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|  |  | <p>NOTE: The substantial amendment must be submitted and approved before distributing the funds. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> |  |  |
|--|--|---|--|--|

**Section: Substantial Action Plan Amendment – C. Requirements for Local Governments ONLY**

**Narrative:**

Does the Substantial Action Plan Amendment include the following information:

|     |       | <b>Questions:</b>  | <b>Notice Reference</b> | <b>HUD Reviewer Response</b><br>(Yes, No, or N/A (if allowable)) |
|-----|-------|--|-------------------------|--|
| 24. | (1/1) | <p><b>LOCAL GOVERNMENTS ONLY</b>– Does the Substantial Action Plan Amendment describe how the impact and unmet needs assessment informs funding determinations, including the rationale behind the decision(s) to provide funds to most impacted and distressed areas?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.C.3.                |  |

|     |       |  |          |  |
|-----|-------|--|----------|--|
| 25. | (1/2) | <p><b>LOCAL GOVERNMENTS ONLY</b> – For <b>any new activity or program</b>, does the Substantial Action Plan Amendment describe all criteria used to select applications (including any priorities), including the relative importance of each criterion, and any eligibility requirements?</p> <p>NOTE: The substantial amendment must be submitted and approved before selecting applications. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>   | III.C.3. |  |
| 26. | (1/3) | <p><b>LOCAL GOVERNMENTS ONLY</b> – For <b>any existing activity or program</b> that did not previously include the selection criteria, does the Substantial Action Plan Amendment describe all criteria used to select applications for funding, including the relative importance of each criterion, and any eligibility requirements?</p> <p>NOTE: The substantial amendment must be submitted and approved before distributing the funds. An N/A response here is available.</p>  | III.C.3. |  |
| 27. | (1/4) | <p><b>LOCAL GOVERNMENTS ONLY</b> – Does the Substantial Action Plan Amendment describe how the distribution and selection criteria will address disaster-related unmet needs in a manner that does not have an unjustified discriminatory effect and ensures the participation of minority residents and those belonging to other protected class groups in the MID areas?</p> <p>NOTE: The description must include who may be expected to benefit, the timing of who will be prioritized, and the amount or proportion of benefits expected to be received by different communities or groups (e.g., the proportion of benefits going to different</p> | III.C.3. |  |

|     |       |   |          |  |
|-----|-------|---|----------|--|
|     |       | <p>locations within the MID or to homeowners versus renters)? An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  |          |  |
| 28. | (1/5) | <p>LOCAL GOVERNMENTS ONLY – Does the Substantial Action Plan Amendment describe the threshold factors and grant size limits that are to be applied?</p> <p>NOTE: The grantee shall describe the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs. The Initial Public Action Plan Review Checklist addresses this requirement in Section A., questions 43-45. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.C.3. |  |
| 29. | (1/6) | <p>LOCAL GOVERNMENTS ONLY – Does the Substantial Action Plan Amendment describe the projected uses for the CDBG-DR funds, by responsible entity, activity, and geographic area?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>   | III.C.3. |  |
| 30. | (1/7) | <p>LOCAL GOVERNMENTS ONLY – Does the Substantial Action Plan Amendment describe for each proposed program and/or activity, its respective CDBG activity</p>   | III.C.3. |  |

|  |  |  |  |  |
|--|--|--|--|--|
|  |  | <p>eligibility category (or categories), national objective(s), and what disaster-related impact is addressed, as described in section II.A.1. of the Consolidated Notice?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> |  |  |
|--|--|--|--|--|

**Section: Substantial Action Plan Amendment – D. General Waivers and Alternative Requirements**

**Narrative:**

Does the Substantial Action Plan Amendment include the following information:

|     |       | <b>Questions:</b>  | <b>Notice Reference</b> | <b>HUD Reviewer Response</b><br>(Yes, No, or N/A (if allowable)) |
|-----|-------|--|-------------------------|--|
| 31. | (1/1) | <p><b>USE OF URGENT NEED</b> – For any new activity or program using the Urgent Need national objective, does the grantee describe in the impact and unmet needs assessment why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community?</p> <p>NOTE: An N/A response here is available.</p> | III.F.3.                |  |

|     |       |   |          |  |
|-----|-------|---|----------|--|
|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 19   |          |  |
| 32. | (1/2) | <p>USE OF URGENT NEED – For any new activity or program using the Urgent Need national objective, does the grantee identify each program or activity that will use the Urgent Need national objective?</p> <p>NOTE: The Secretary finds good cause to waive the urgent need national objective criteria in section 104(b)(3) of the HCDA and to establish the following alternative requirement for any CDBG–DR grantee using the urgent need national objective for a period of 36 months after the applicability date of the grantee’s Allocation Announcement Notice. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 19</p> | III.F.3. |  |
| 33. | (1/3) | <p>USE OF URGENT NEED – For any new activity or program using the Urgent Need national objective, does the grantee document how each program and/or activity funded under the urgent need national objective in the action plan responds to the urgency, type, scale, and location of the disaster-related impact as described in the grantee’s impact and unmet needs assessment?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 19</p>  | III.F.3. |  |
| 34. | (2/1) | OVERALL BENEFIT REQUIREMENT – Does the budget allocate not less than 70 percent of funds (minus any admin or planning costs) to be used for activities that benefit low- and moderate-income persons (overall benefit requirement)?   | III.F.2. |  |



|     |       |  |          |  |
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|     |       | <p>NOTE: A grantee may seek to reduce the overall benefit requirement below 70 percent of the total grant through a substantial amendment as provided in section III.C.6.a. in the Consolidated Notice.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 19</p>  |          |  |
| 35. | (2/2) | <p>OVERALL BENEFIT REQUIREMENT – If the Substantial Action Plan Amendment included a request to reduce the overall benefit requirement below 70 percent of the total grant, did the grantee provide a justification that identifies the planned activities that meet the needs of it LMI population?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 19</p>   | III.F.2. |  |
| 36. | (2/3) | <p>OVERALL BENEFIT REQUIREMENT – If the Substantial Action Plan Amendment included a request to reduce the overall benefit requirement below 70 percent of the total grant, did the grantee provide a justification that describes the proposed activities and programs that will be affected by the alternative requirement, including the activities proposed location(s) and role(s) in the grantee’s long-term disaster recovery plan?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.F.2. |  |
| 37. | (2/4) | <p>OVERALL BENEFIT REQUIREMENT – If the Substantial Action Plan Amendment included a request to reduce the overall benefit requirement below 70 percent of the total grant, did the grantee provide a justification that describes how the proposed activities and programs that will be affected by the alternative requirement prevent the grantee from meeting the 70 percent requirement?</p>  | III.F.2. |  |

|     |       |  |          |  |
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|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 32  |          |  |
| 38. | (2/5) | OVERALL BENEFIT REQUIREMENT – If the Substantial Action Plan Amendment included a request to reduce the overall benefit requirement below 70 percent of the total grant, did the grantee provide a justification that demonstrates that LMI persons’ disaster related needs have been sufficiently met and that the needs of non-LMI persons or areas are disproportionately greater, and that the jurisdiction lacks other resources to serve non-LMI persons?<br><br>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 32 | III.F.2. |  |
| 39. | (2/6) | OVERALL BENEFIT REQUIREMENT – If the Substantial Action Plan Amendment included a request to reduce the overall benefit requirement below 70 percent of the total grant, did the grantee provide a justification that demonstrates a compelling need for HUD to lower the percentage of the grant that must benefit low-and moderate-income persons?<br><br>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 32  | III.F.2. |  |

**Section: Substantial Action Plan Amendment – E. Consultation and Citizen Participation**

**Narrative:**

Does the Substantial Action Plan Amendment include the following information:

|  |  | Questions: | Notice<br>Reference | HUD<br>Reviewer<br>Response |
|--|--|------------|---------------------|-----------------------------|
|--|--|------------|---------------------|-----------------------------|

|     |       |   |            |                                  |
|-----|-------|---|------------|----------------------------------|
|     |       |   |            | (Yes, No, or N/A (if allowable)) |
| 40. | (1/1) | <p><b>CLARITY OF THE PLAN</b> – Does the Substantial Action Plan Amendment include sufficient information so that all interested parties will be able to understand and comment on the plan, including the steps it took to make it available in a form accessible to persons with disabilities?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.C.1.   |                                  |
| 41. | (2/1) | <p><b>PUBLICATION OF THE SUBSTANTIAL ACTION PLAN AMENDMENT AND OPPORTUNITY FOR PUBLIC COMMENT</b> – Following the creation of the Substantial Action Plan Amendment in DRGR and before the grantee submits the Substantial Action Plan Amendment to HUD, did the grantee publish the proposed plan for public comment?</p> <p>NOTE: The manner of publication must include prominent posting on the grantee’s official disaster recovery website and must afford citizens, affected local governments, and other interested parties a reasonable opportunity to review the plan or substantial amendment.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.D.1.b. |                                  |
| 42. | (2/2) | <p><b>PUBLICATION OF THE SUBSTANTIAL ACTION PLAN AMENDMENT AND OPPORTUNITY FOR PUBLIC COMMENT</b> – Did the grantee demonstrate that it considered if there were potential barriers that may limit or prohibit vulnerable</p>   | III.D.1.b. |                                  |

|     |       |   |            |  |
|-----|-------|---|------------|--|
|     |       | <p>populations or underserved communities and individuals affected by the disaster from providing public comment on the Substantial Action Plan Amendment?</p> <p>If the grantee did identify barriers, did it take reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with LEP?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> |            |  |
| 43. | (2/3) | <p><b>PUBLICATION OF THE SUBSTANTIAL ACTION PLAN AMENDMENT AND OPPORTUNITY FOR PUBLIC COMMENT</b> – Does the grantee’s records demonstrate that it has notified affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>   | III.D.1.b. |  |
| 44. | (3/1) | <p><b>CONSIDERATION OF PUBLIC COMMENTS</b> – Did the grantee provide a reasonable time frame (no less than 30 days) and method(s) (including electronic submission) for receiving comments on the Substantial Action Plan Amendment?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.D.1.c. |  |
| 45. | (3/2) | <p><b>CONSIDERATION OF PUBLIC COMMENTS</b> – If the grantee received comments, did the grantee demonstrate that it considered all oral and written comments on the Substantial Action Plan Amendment, and did the grantee identify updates or changes made to the Action Plan in response to public comments?</p>   | III.D.1.c. |  |

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|     |       | <p>NOTE: Grantee responses shall address the substance of the comment rather than merely acknowledge that the comment was received.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>   |            |  |
| 46. | (3/3) | <p>CONSIDERATION OF PUBLIC COMMENTS – Did the grantee upload the summary of comments on the amendment, as well as the grantee’s response to each, in DRGR with the Substantial Action Plan Amendment ?</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p>  | III.D.1.c. |  |
| 47. | (4/1) | <p>AVAILABILITY AND ACCESSIBILITY OF DOCUMENTS – Did the grantee make the Substantial Action Plan Amendment and vital documents available to the public on its website?</p> <p>NOTE: Vital documents are those that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> | III.D.1.d. |  |
| 48. | (4/2) | <p>AVAILABILITY AND ACCESSIBILITY OF DOCUMENTS – Did the grantee make these documents available in a form accessible to persons with disabilities and those with LEP?</p>   | III.D.1.d. |  |

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|--|--|--|--|--|
|  |  | <p>NOTE: The grantee must take reasonable steps to ensure meaningful access to its programs and activities by LEP persons, including members of protected classes, vulnerable populations, and individuals from underserved communities.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 32</p> |  |  |
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**Section: Substantial Action Plan Amendment - F. Allocation Announcement Notice – CDBG-DR Mitigation Set-Aside**

**Narrative:**

The Appropriations Act requires HUD to include in any allocation of CDBG-DR funds for unmet needs an additional amount of 15 percent for mitigation activities (“CDBG-DR mitigation set-aside”).

Complete this section if the Substantial Action Plan Amendment is in response to the incorporation of additional funds, or if there is a change in the use of the CDBG-DR mitigation set-aside that meets the Substantial Amendment Criteria. Grantees who are amending their action plan in response to an additional allocation awarded in the *Federal Register* notices published on January 18, 2023 (88 FR 3198), and/or May 24, 2022 (87 FR 31636) must update the mitigation needs assessment to inform their mitigation activities.

If the Substantial Action Plan Amendment is for a different reason, and is not for an additional allocation or for a change related to the CDBG-DR mitigation set-aside, the HUD Reviewer can select “N/A” for each question in this section and continue to Section G. – Conclusion.

Does the Substantial Action Plan Amendment include the following information:

|  |  |                   |                         |  |
|--|--|-------------------|-------------------------|--|
|  |  | <b>Questions:</b> | <b>Notice Reference</b> | <b>HUD Reviewer Response</b><br>(Yes, No, or N/A (if allowable)) |
|--|--|-------------------|-------------------------|--|

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| 49. |       | <p>INCORPORATION OF ADDITIONAL FUNDS – Is this Substantial Action Plan Amendment in response to the additional allocation awarded in the <i>Federal Register</i> notices published on January 18, 2023 (88 FR 3198), and/or May 24, 2022 (87 FR 31636)?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 1</p>  | II.B    |  |
| 50. | (1/1) | <p>CDBG-DR MITIGATION SET-ASIDE – Is this Substantial Action Plan Amendment in response to the use of the CDBG-DR mitigation set-aside?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 1</p>  | IV.A.2. |  |
| 51. | (1/2) | <p>CDBG-DR MITIGATION SET-ASIDE – Does the Substantial Action Plan Amendment identify how the proposed use of the CDBG-DR mitigation set-aside will: (1) meet the definition of mitigation activities; (2) address the current and future risks as identified in the grantee’s mitigation needs assessment in the MID areas; (3) be CDBG-eligible activities under Title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; and (4) meet a national objective?</p> <p>NOTE: 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</p> | IV.A.2. |  |

|     |       |   |           |  |
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|     |       | <p>loss of property, and suffering and hardship, by lessening the impact of future disasters. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0 Label: 1</p>   |           |  |
| 52. | (2/1) | <p>MITIGATION NEEDS ASSESSMENT – Did the grantee include in its Substantial Action Plan Amendment an updated mitigation needs assessment to inform the activities funded by the CDBG-DR mitigation set-aside?</p> <p>NOTE: Amended mitigation needs assessments should include any additional mitigation needs identified and additional resources that became available. An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0 Label: 1</p>   | IV.A.2.a. |  |
| 53. | (2/2) | <p>MITIGATION NEEDS ASSESSMENT – In the grantee’s amended mitigation needs assessment, did the grantee assess the characteristics and impacts of current and future hazards identified through its recovery from the qualified disaster and any other Presidentially declared disaster by conducting a risk-based assessment?</p> <p>NOTE: Mitigation solutions designed to be resilient only for threats and hazards related to a prior disaster can leave a community vulnerable to negative effects from future extreme events related to other threats or hazards. When risks are identified among other vulnerabilities during the framing and design of mitigation projects, implementation of those projects can enhance protection and save lives, maximize the utility of scarce resources, and benefit the community long after the projects are complete. An N/A response here is available.</p> | IV.A.2.a. |  |



|     |       |   |           |  |
|-----|-------|---|-----------|--|
|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 3  |           |  |
| 54. | (2/3) | <p>MITIGATION NEEDS ASSESSMENT – In the amended mitigation needs assessment, did the grantee assess its 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?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 4</p>   | IV.A.2.a. |  |
| 55. | (2/4) | <p>MITIGATION NEEDS ASSESSMENT – Did the grantee cite data sources in its amended mitigation needs assessment and at a minimum, use the risks identified in the current FEMA-approved state or local HMP?</p> <p>NOTE: If a jurisdiction is currently updating an expired HMP, the grantee’s agency administering the CDBG-DR funds must consult with the agency administering the HMP update to identify the risks that will be included in the assessment.</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 5</p> | IV.A.2.a. |  |

|     |       |   |           |  |
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| 56. | (3/1) | <p>CONNECTION OF PROGRAMS AND PROJECTS TO THE MITIGATION NEEDS ASSESSMENT – In the amended mitigation needs assessment, did the grantee describe a clear connection between identified mitigation needs and its proposed activities in the MID areas funded by the CDBG-DR mitigation set-aside?</p> <p>NOTE: An N/A response here is available.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 5</p> | IV.A.2.b. |  |
|-----|-------|---|-----------|--|

**Section: Substantial Action Plan Amendment – G. Conclusion**

**Narrative:**

Does the Substantial Action Plan Amendment include the following information:

|     |       | Questions:  | Notice Reference | HUD Reviewer Response<br>(Yes, No, or N/A (if allowable)) |
|-----|-------|---|------------------|---|
| 57. | (1/1) | CONCLUSION – Based on the reviewer’s responses to the questions in this checklist, does the grantee include sufficient information in its Substantial Action Plan Amendment so that all interested parties will be able to understand and comment on the Substantial Action Plan Amendment? | III.C.1.         |   |

|     |       |  |  |  |
|-----|-------|--|--|--|
|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 32  |  |  |
| 58. | (1/2) | <p>COMPLETE AND COMPLIANT – Based on the reviewer's responses to the questions in this checklist, is the Substantial Action Plan Amendment complete and in compliance with the <i>Federal Register</i> notice governing the use of these funds (88 FR 3198), (87 FR 6364), <b>or</b> (87 FR 31636) and Public Law 117-43 or Public Law 117-180?</p> <p>NOTE: This question applies to grantees who have an allocation in <b><u>one or two</u></b> of the <i>Federal Register</i> notices cited here, but not all three notices. For grantees who have an allocation in all three notices, the HUD Reviewer can select a “N/A” response for this question.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 1</p> |  |  |
| 59. | (1/3) | <p>COMPLETE AND COMPLIANT – Based on the reviewer's responses to the questions in this checklist, is the Substantial Action Plan Amendment complete and in compliance with the <i>Federal Register</i> notices governing the use of these funds (88 FR 3198), (87 FR 6364), and/or (87 FR 31636) and Public Law 117-43 and/or Public Law 117-180?</p> <p>NOTE: This question applies to grantees who have an allocation in <b><u>all three</u></b> <i>Federal Register</i> notices cited. For grantees who only have an allocation in one of these notices, the HUD Reviewer can select a “N/A” response for this question.</p> <p>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br/>Label: 1</p>                               |  |  |
| 60. | (1/4) | APPROVED – Is the Substantial Action Plan Amendment Approved?  |  |  |

|     |       |   |  |  |
|-----|-------|---|--|--|
|     |       | Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 3  |  |  |
| 61. | (1/5) | REASON FOR RESUBMITTAL – If the Plan needs to be re-submitted, please indicate the reasons.<br><br>Type: OneOfMany Choice: Yes;No;Second Mandataor 1 Comments 1 Autorule: 0<br>Label: 3 |  |  |