**Universal Notice Local Government Action Plan Guide and Template**

**HUD’s Office of Disaster Recovery Guide and Template Resource**

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**Introduction**

# The Universal Notice requires CDBG-DR grantees to develop an Action Plan in order to access their grant funds. The Action Plan is a key mechanism for grantees to inform the public and HUD of the intended use of the funds within their community and how this plan connects to the community’s remaining unmet needs and mitigation needs associated with the qualifying disaster(s). The Action Plan must identify the use of all CDBG-DR funds – including criteria for eligibility and how the uses address long-term recovery needs, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed (MID) areas.

# This tool was prepared to help grantees with their initial action plan development. This tool is a guide and grantees are encouraged to adapt the Action Plan Template to meet their local goals, needs, and recovery circumstances. HUD aims to support grantees in gathering the required information needed at the initial Action Plan submission to HUD. HUD expects that recovery needs will change over time, leading to substantial and nonsubstantial amendments to the Action Plan and programmatic policies and procedures. As needs change, grantees must publish amendments to the Action Plan on its official website and describe the changes within the context of the entire action plan. To promote transparency with the public, a grantee can establish a change log at the beginning of the Action Plan identifying the changes made to the plan, along with their protocols for substantial and nonsubstantial amendments. While working through the Action Plan Template it is important to note the following:

* HUD will monitor the grantee’s actions and use of funds for consistency with the plan, as well as meeting the performance and timeliness objectives therein.
* HUD will return or disapprove all action plans that are substantially incomplete if it is determined that the plan does not satisfy all the required elements identified in the Universal Notice and the applicable Allocation Announcement Notice.
* As grantees develop their action plan there are required consultations with various stakeholders and citizens to inform about their funding decisions prior to submitting their action plan to HUD.

**How to Use this Guide and Template**

The Office of Disaster Recovery has created this resource for grantees as a supplemental tool to the Universal Notice and applicable Allocation Announcement Notices (AAN). This tool is an optional resource, and Grantees are not required to use this Universal Notice Action Plan Guide and Template in the development of their initial Action Plan. Grantees should adapt this tool to fit their needs. Grantees are reminded to delete all of the instruction boxes and “lightbulb textboxes” before publishing their Action Plan for public comment.

This guide contains the following components:

|  |
| --- |
| Instructions: |
| Throughout this document, all of the instruction prompts will be signified by a callout box identical to the design here. The remainder of the content is established for grantees to adapt and adjust for their Action Plan and long-term disaster recovery needs. |



Lightbulb textboxes are designed to provide grantees with essential information, reminders, tips and context.

Headings: The headings found in the Template section of this document provide grantees with the general headings they will need to incorporate into their Action Plan.

Template Text: Template text is sample verbiage that a grantee may use in their Action Plan.

Gray text boxes are designed to provide grantees with a description of the content that is required under each heading.

|  |  |
| --- | --- |
| Tables: Tables are designed to assist grantees with communicating and formatting essential information. | |
| Table Information 1 | Some tables have blank spaces that prompt grantees to enter basic information. |
| Table Information 2 | Some tables are designed to instruct grantees on how to enter the correct information in the correct format. |

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# **Grantee Action Plan Template**

Starting with this section, the Action Plan Guide transitions into the Action Plan Template, which is **designed for grantee to update and modify to accommodate their own Action Plan development**. As explained above, grantees should delete each instruction box prior to moving their Action Plan forward for public comment, and then submission to HUD.

# Grantee Cover Page

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| --- |
| Instructions: |
| Grantees can develop their own unique branding for the Action Plan cover page. *Note: Grantees will also want to remove the HUD branding that is in the header portion of this document.* |

# Change Log

|  |
| --- |
| Instructions: |
| Grantees can establish a change log within their Action Plan to adequately track changes to the Action Plan over the course of the grant life cycle. Grantees will have two types of amendments to their Action Plans, substantial and nonsubstantial amendments. Substantial amendments require the opportunity for public comment and HUD review, while nonsubstantial amendments are more administrative in nature. Grantee must sequentially number all substantial and non-substantial amendments. Additionally, a grantee’s current version of its entire Action Plan must be accessible for viewing as a single document at any given point in time, rather than require the public or HUD to view and cross reference changes among multiple amendments. |

Table X: Change Log

|  |  |
| --- | --- |
| Version (Date) | Summary of Changes Made |
| Version 1 (Month Day, Year) | Action Plan Approved by HUD. |
|  |  |
|  |  |

# Table of Contents

|  |
| --- |
| Instructions: |
| Grantees can establish a table of contents to help guide the reader through the Action Plan organization. |

# 

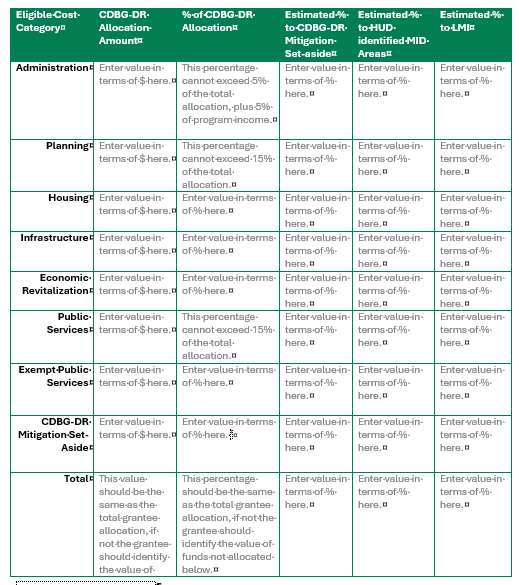
# Executive Summary

|  |
| --- |
| Instructions: |
| Grantees must develop an executive summary describing the contents of the Action Plan and its proposed use of funds so that interested parties will be able to understand and comment on the Action Plan. |

## 



Grantees are encouraged to “copy and paste” the table that they develop within the “Unmet Needs and Mitigation Needs Summary” section of this **Grantee Action Plan Template**. *Note: This template provides a screenshot here to demonstrate this action.*



## Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the Add Name of State, Local Government, or Indian Tribe will receive Add the Allocation Amount in funding to support long-term recovery efforts following Add the Disaster Type with FEMA Disaster Number(s) through the Add Name of Grantee Organization. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet need in Add Name of State, Local Government, or Indian Tribe.

To meet disaster recovery needs, the appropriations act(s) making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. HUD has allocated Add the Allocation Amount in CDBG-DR funds to the Add Name of the State, Local Government, or Indian Tribe in response to following Add the Disaster Type with FEMA Disaster Number(s), through the Allocation Announcement Notice published in the Federal Register at Add the Allocation Announcement Notice Federal Register Citation. This allocation was made available through the Add the Public Law Full Title (Public Law Citation).

## Disaster-Specific Overview

Describe disaster specific impacts to the community. Grantees should use images and maps when applicable. This summary should be substantive and data informed as it provides the basis for the unmet needs assessment.

### Most Impacted and Distressed Areas

#### HUD identified MID Areas

Grantees must describe the unmet need in the HUD identified MID areas, as the allocations are based on the unmet needs of these specific communities, which are the least likely to fully recover without additional assistance. Grantees are required to use at least 80 percent of the CDBG-DR award to benefit the HUD-identified MID areas. Local government grantees whose HUD-identified MID areas include their entire jurisdiction, must use 100 percent of the CDBG-DR award to benefit the HUD-identified MID area. However, HUD encourages all grantees to consider using 100 percent of its award to benefit HUD-identified MID areas since the data from these areas were used to determine the amount of the award. Written description and the use of maps are impactful ways to demonstrate this concept to the public.

#### Grantee-identified MID Areas

If allowed, and the grantee chooses to spend a portion (i.e., up to 20 percent) of its award outside of the HUD-identified MID area, it will determine and identify in the Action Plan where the grantee will use that amount (“grantee-identified MID areas”), and that portion of the allocation may only be used to address those areas that the grantee determines are most impacted and distressed, meaning the areas that have the greatest amount of damage and unmet need outside of the HUD-identified MID areas. Additionally, any grantee-identified MID areas must have received a presidential major disaster declaration identified by the disaster numbers listed in the applicable AAN. The grantee must use quantifiable and verifiable data in its analysis, and reference it in its Action Plan, to identify the grantee-identified MID areas and indicate how the proposed use of funds will prioritize the remaining unmet needs for low- and moderate-income (LMI) individuals and areas. The addition of a grantee-identified MID area after the submittal of the initial Action Plan would require a substantial amendment to the grantee’s Action Plan. Grantees should include a written description, verifiable data, and the use of maps are impactful ways to demonstrate this concept to the public. If there are no grantee identified MID areas you may delete this section.

### Overview of the Impacts of the Qualifying Disaster

Description of the effects of the qualifying disaster(s) and the greatest remaining recovery needs that have not been addressed by other sources of funds, including insurance proceeds, other Federal assistance, or any other funding source. Grantees should develop this content with written description and the use of photos.

**Table X: Disaster Overview**

|  |  |
| --- | --- |
| Disaster Summary | |
| Qualifying Disaster: |  |
| HUD-identified MID Areas: |  |
| Grantee-Identified MID Areas |  |

**Table X: CDBG-DR Allocation Overview**

|  |  |
| --- | --- |
| CDBG-DR Allocation Overview: | |
| CDBG-DR Allocation: |  |
| CDBG-DR Mitigation Set Aside: |  |
| Total Allocation: |  |

## Unmet Needs and Mitigation Needs Summary

**Table X: Unmet Needs and Proposed Allocations**

| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation | Estimated % to CDBG-DR Mitigation Set-aside | Estimated % to HUD identified MID Areas | Estimated % to LMI |
| --- | --- | --- | --- | --- | --- |
| Administration | Enter value in terms of $ here. | This percentage cannot exceed 5% of the total allocation, plus 5% of program income. |  |  |  |
| Planning | Enter value in terms of $ here. | This percentage cannot exceed 15% of the total allocation. | Enter value in terms of % here. |  |  |
| Housing | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| Infrastructure | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| Economic Revitalization | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| Public Service | Enter value in terms of $ here. | This percentage cannot exceed 15% of the total allocation. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| Exempt Public Service | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| CDBG-DR Mitigation Set-Aside | Enter value in terms of $ here. | Enter value in terms of % here. [[1]](#footnote-2) | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| Total | This value should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. | This percentage should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. |
| % of Total | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of % here.[[2]](#footnote-3) | Enter value in terms of % here.[[3]](#footnote-4) |

# 

# Unmet Needs Assessment

|  |
| --- |
| Instructions: |
| Grantees must assess the unmet needs of the disaster to strategically inform and guide the use of the grant funds. The unmet needs assessment will help a grantee evaluate community needs across its jurisdiction by assessing the remaining effects of the qualifying disaster as they relate to housing, infrastructure, and the economy.  Note, HUD can provide CDBG-DR grantees with access to FEMA data to support the development of the unmet needs assessment and the Action Plan. For more information, view the guidance posted here: [Data Sharing | HUD.gov / U.S. Department of Housing and Urban Development (HUD)](https://www.hud.gov/program_offices/comm_planning/cdbg-dr/data-sharing). |



Consider that disaster recovery needs will evolve over time and the grantee must amend the action plan, including the impact and unmet needs assessment, as additional needs are identified, and additional resources become available. Grantees must revisit and update the impact and unmet needs assessment when moving funds from one program to another through a substantial amendment.

### Evaluate the Impacts of the Three Core Aspects of Recovery

Evaluation of the three core aspects of recovery— housing, infrastructure, and the economy (e.g., estimated job losses), which considers the pre-disaster needs (e.g., a lack of affordable housing) that have been exacerbated by the disaster. The assessment of housing needs must address: (1) emergency shelters; (2) interim and permanent housing; (3) rental and owner-occupied single family and multifamily housing; (4) public housing (including HUD-assisted housing) and other types of affordable housing, including housing for vulnerable populations (including those who were unhoused prior to the disaster).

#### Housing

##### Emergency Shelters, Interim, and Permanent Housing

Grantees should consider data sets that analyze affected Continuum of Care Entities, Point-in-time Count- type of shelters disaster (emergency shelter, transitional housing, unsheltered homeless), Point-in-time Count- impacted by the disaster (emergency shelter, transitional housing, unsheltered homeless).

##### Rental and Owner-Occupied Single Family and Multifamily Housing

Grantees should consider data from FEMA including FEMA Individual Assistance (IA) Owner Occupied, FEMA IA Tenants Applicants, FEMA IA Applications by Housing Type, FEMA Real Property Damage Owner Occupied Units, FEMA Real Property Damage Rental Units. While it can be challenging to assess the disaster impacts on renters, marginally housed and the homeless, using existing community development and CoC plans and studies, as well as including CoC and community representatives in the assessment and planning can be very valuable.

##### Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

Grantees should consider data that analyze Multifamily Assisted Housing, Public Housing Authorities Damaged, Owner with Unmet Need in a Floodplain, Insurance Claims and Losses in Disaster Impacted Areas, Total Home Loans Approved by SBA, Manufactured Housing Units Impacted by the Disaster, Assisted Housing Impacted by the Disaster (housing choice vouchers, LIHTC, public housing dwelling units).

#### Infrastructure

Grantees should consider data from FEMA’s Public Assistance Program to identify and value the disaster impacts, and, local Capital Improvement Plans, to identify planned projects that were adversely impacted by the disaster.

#### Economic Revitalization

Grantees should consider data from SBA (e.g., total approved loans, applicant breakdown) and local economic development authorities (e.g., estimating business losses).

#### Public Service

Grantees should consider data from local sources to determine the need for public service activities in their communities. Public service activities can include mental health services and counseling, legal services, interim mortgage assistance, rental assistance, and disaster relief assistance for LMI persons.



Every community’s disaster recovery will look different. It is important to remember that these tables are meant to act as an overarching guide. Grantees are encouraged to modify the tables found within this template to fit their local recovery needs and contexts.

**Table X: Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need**

|  |  |  |  |
| --- | --- | --- | --- |
| Cost Categories | A  Direct and Indirect Need | B  Financial Assistance Budgeted and Obligated | A-B  Unmet Need |
| Emergency Shelters, Interim, and Permanent Housing |  |  |  |
| Rental Housing |  |  |  |
| Owner-Occupied Housing |  |  |  |
| Public Housing and Other Affordable Housing |  |  |  |
| Infrastructure |  |  |  |
| Economic Development |  |  |  |
| Public Service |  |  |  |
| Total |  |  |  |

# Mitigation Needs Assessment.

|  |
| --- |
| Instructions: |
| For purposes of grants subject to the Universal Notice, mitigation activities are defined as those activities that increase resilience 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. At a minimum, grantees must include a risk-based assessment to identify current and future hazards. HUD requires that grantees coordinate with other local resilience and long-term recovery plans to make sure the grantee is mitigating holistically for current and future risks. |



Mitigation needs evolve over time and grantees are to amend the mitigation needs assessment and action plan as conditions change, additional mitigation needs are identified, and additional resources become available.

The mitigation needs assessment must include a risk-based assessment to identify current and future hazards (e.g., sea level rise, strong winds, tornados, storm surge, flooding, volcanic activity, earthquakes, extreme heat, drought, and wildfire risk, where appropriate). The assessment must describe how the hazards do or can impact the HUD-identified and grantee-identified MID areas and cite the appropriate data sources. Grantees must explain how the risk-based assessment will inform the use of the CDBG-DR funds and identify if other sources of funding are available to address its identified mitigation needs.

At a minimum, grantees must use the risks identified in the current FEMA-approved state or local Hazard Mitigation Plan (HMP), Community Wildfire Protection Plan (CWPP), or other resilience or long-term recovery plans to inform the assessment. 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.

A grantee may choose to simply cite the current FEMA-approved HMP, CWPP, or other resilience or long-term recovery plan to address the mitigation needs assessment, if there is a clear connection of programs and projects to the mitigation needs. If a grantee chooses this option, the grantee must make the HMP, CWPP, or other resilience or long-term recovery plan available on the grantee’s official disaster recovery website and provide a direct link to the selected plan in the mitigation needs assessment section of the Action Plan.

**Table X: CDBG-DR Mitigation Set-Aside Needs Assessment**

|  |  |  |  |
| --- | --- | --- | --- |
| CDBG-DR Mitigation Set-Aside Needs Assessment: | | | |
| Categories Affected | A  Total  Need | B  Financial Assistance Budgeted and Obligated | A-B  Unmet Need |
| Housing |  |  |  |
| Infrastructure |  |  |  |
| Economic Development |  |  |  |
| Total |  |  |  |

# Connection of proposed programs and projects to unmet needs and mitigation needs.

|  |
| --- |
| Instructions: |
| Grantees must describe the connection between identified unmet needs and mitigation needs and the allocation of CDBG-DR resources within its Action Plan. Additionally, grantees must use their CDBG-DR funds in a manner that complies with applicable statutes, which include:  • Section 109 of the HCDA, 42 U.S.C. 5309;  • Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;  • Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;  • Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act), 42 U.S.C. 3601 – 19;  • Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794;  • The Americans with Disabilities Act of 1990,42 U.S.C. 12131 et seq.; and  • Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).  At a minimum, the Action Plan must:   1. Provide a clear connection between a grantee’s assessments and its proposed programs and projects in the MID areas (or outside in connection to the MID areas). Such a description 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 unmet needs and mitigation needs assessments or provide an acceptable justification for a disproportional allocation. 2. Describe how the grantee is incorporating hazard mitigation measures to reduce the impacts of future disasters and considering all hazard risks, as identified in its mitigation needs assessment. 3. Describe all reasonable efforts the grantee will take to minimize displacement of persons or entities, assist any persons or entities displaced, and ensure accessibility needs of displaced persons with disabilities. |

# Provide a narrative that demonstrates a clear connection between a grantee’s assessments and its proposed programs and projects in the MID areas (or outside in connection to the MID areas). Such description 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 unmet needs and mitigation needs assessments or provide an acceptable justification for a disproportional allocation.

Provide a narrative that demonstrates how the grantee is incorporating hazard mitigation measures to reduce the impacts of future disasters and considering all hazard risks, as identified in its mitigation needs assessment.

Provide a narrative that describes all reasonable efforts the grantee will take to minimize displacement of persons or entities, assist any persons or entities displaced, and ensure accessibility needs of displaced persons with disabilities.

**Table X: CDBG-DR Program Allocation and Funding Thresholds**

| Eligible Cost Category | Unmet Need | % of Unmet Need | % of Funding to be Expended in HUD Identified MID | CDBG-DR Allocation Amount | % of CDBG-DR Allocation (Excluding the 15% Mitigation Set-Aside) |
| --- | --- | --- | --- | --- | --- |
| Administration (5% cap) |  |  |  | Enter value in terms of $ here. | Enter value in terms of % here. |
| Planning (15% cap) |  |  | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Rental Housing | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Owner-Occupied Housing | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Infrastructure | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Economic Revitalization | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Public Service (15% cap) | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | This percentage cannot exceed 15% of the total allocation. |
| Exempt Public Service (no cap) | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Total | This value should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Funds that have not been allocated: | | | | Enter value in terms of $ here. | Enter value in terms of % here. |

# Allocation and Award Caps

|  |
| --- |
| Instructions: |
| Each grantee must demonstrate their planned use of funds through their Action Plan so the public can understand what types of assistance disaster survivors can apply for and what limits there are on possible awards.  For each program it intends to fund, the grantee must include the following in its Action Plan:   1. Provide a description of the disaster recovery program to be funded; 2. Identify the CDBG-DR eligible activity and national objective, including only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; 3. Identify the responsible entity assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4. State grantees who exercise HUDs environmental review responsibilities must follow the requirements per 24 CFR 58.4(b)(2) and 24 CFR 58.18; 4. Identify which geographic areas (i.e., HUD-identified and/or grantee-identified MID areas) that may benefit from CDGB-DR funds; 5. Explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance; 6. If the appropriations act that funded the grantee’s award includes additional funds for mitigation, the grantee must also identify how the proposed use of CDBG-DR mitigation set-aside funds will meet the definition of mitigation activities (as described in section I.C.1.b.); 7. Describe (1) the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs and (2) the maximum income (i.e., income cap) of any beneficiary receiving CDBG-DR assistance for direct-benefit activities. Each grantee must also indicate in its Action Plan that it will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities. If the maximum amount of assistance is unknown for a specific program or project when the grantee is submitting the initial Action Plan to HUD, the grantee must update the Action Plan through a substantial amendment (as described in section I.C.1.g.) once the information is known. The substantial amendment must be submitted and approved before awarding funds to applicants; and 8. Any other known eligibility criteria established by the grantee for assistance (e.g., priority intake).   Grantees should use the Allocation and Award Cap section to meet the requirements described above for each of their planned programs. |

# Funding Citeria

|  |
| --- |
| Instructions: |
| Each grantee must identify how it will distribute its grant funds by program type (e.g., direct implementation, method of distribution to local government or Indian Tribes, or a combination methodology). Providing information on how funds will be administered provides a clear picture to the public on how funds are sub-granted to eligible entities through a method of distribution or for applications that a grantee solicits for programs to be carried out directly.  At a minimum, the grantee must establish the following criteria within its Action Plan so the public can clearly understand its funding criteria for funds sub-granted to eligible entities through a method of distribution or for applications that the grantee solicits for programs to be carried out directly:   1. All criteria used to allocate and award the funds, including the relative importance of each criterion and any priorities; 2. Establish the maximum grant size available; and 3. Describe how the distribution and selection criteria will address disaster-related unmet needs or mitigation needs in the MID areas; and 4. Describe the steps to be followed to encourage the participation of disaster-impacted persons in the MID areas.   Grantees should use the Funding Citeria section to meet the requirements described above for each program type. |

If some required information is unknown when the grantee is submitting its initial Action Plan to HUD, the grantee must update the Action Plan through a substantial amendment once the information is known. Historically, appropriations acts require a grantee to submit a plan detailing the proposed use of all funds before HUD can obligate funding to the grantee. Without all the required information in the initial Action Plan, HUD may obligate only a portion of the grant funds until the substantial amendment providing the required information is submitted and approved by HUD.



## General Exception Criteria

Each grantee must also indicate in its Action Plan that it will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities. If the maximum amount of assistance is unknown for a specific program or project when the grantee is submitting the initial Action Plan to HUD, the grantee must update the Action Plan through a substantial amendment (as described in section I.C.1.g.) once the information is known. The substantial amendment must be submitted and approved before awarding funds to applicants.

## Administration

**Table X: Grantee Administration Activity(ies) Overview**

|  |  |  |
| --- | --- | --- |
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation |
| Administration Total: | Enter value in terms of $ here. | This percentage cannot exceed 5% of the total allocation, plus 5% of program income. |
| Total | This value should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. | This percentage should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. |

## Planning

**Table X: Grantee Planning Activity(ies) Overview**

|  |  |  |
| --- | --- | --- |
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation |
| Planning Activity Number One | Enter value in terms of $ here. | Enter value in terms of % here. |
| Planning Activity Number Two | Enter value in terms of $ here. | Enter value in terms of % here. |
| Planning Activity Number Three | Enter value in terms of $ here. | Enter value in terms of % here. |
| *Add additional rows as needed.* | … | … |
| Planning Total: | Enter value in terms of $ here. | This percentage cannot exceed 15% of the total allocation. |
| Total | This value should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. | This percentage should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. |

## 

Every community’s disaster recovery will look different. It is important to remember that these tables are meant to act as an overarching guide. Grantees are encouraged to modify the tables found within this template to fit their local recovery needs and contexts.



## Housing

### Housing Programs Overview

|  |
| --- |
| Instructions: |
| Each grantee can use the table below for the housing program(s) they are choosing to establish and can use the prompts below for each program within this category. As a reminder, HUD may disapprove or return an Action Plan or a portion of an Action Plan if it is inconsistent with the purposes of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703), if it is substantially incomplete, or if the certifications under section I.C.4. of the Universal Notice are not satisfactory to the Secretary in accordance with 24 CFR 570.304 or 570.485(c), as applicable. For example, if a grantee does not identify all information for the proposed program(s), it is possible that the action plan is substantially incomplete and HUD will require changes before approving the plan. |

**Table X: Grantee Housing Programs Overview**

|  |  |  |
| --- | --- | --- |
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit |
| Housing Program Number One | Enter value in terms of $ here. | Enter value in terms of % here. |
| Housing Program Number Two | Enter value in terms of $ here. | Enter value in terms of % here. |
| Housing Program Number Three | Enter value in terms of $ here. | Enter value in terms of % here. |
| *Add additional rows as needed.* | … | … |
| Housing Program Total: | Enter value in terms of $ here. | Enter value in terms of % here. |
| Total | This value should be the same as the total grantee allocation for ‘housing’, if not the grantee should identify the value of funds not allocated below. | Total the percentage of DR allocation amount which will benefit LMI individuals/areas. |

### Grantee Housing Program Number One Template

**Program Title**: Add program title here.

**Amount of CDBG-DR Funds Allocated to this Program**: Identify how much funds you are allocating to this program here.

**Eligible Activity(ies)**: Identify eligible “housing” activity.

**National Objective**: Identify the CDBG-DR national objective including only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement.

**Lead Agency and Distribution Model:** Identify the entity directly managing the program, and if different than the RE, its relationship type (i.e. subrecipient, contractor, other governmental entity of the RE by MOU). Additionally, each grantee must identify how it will distribute it’s grant funds by program type (e.g., direct implementation, method of distribution to local government or Indian Tribes, or a combination methodology).

**Program Description**: Provide program description here. This description should include a narrative of the program’s tie to the qualifying disaster, a connection to the unmet needs assessment, and anticipated program accomplishments. If any of these elements are omitted, this may not be an approvable program. Should a grantee not identify all information for the proposed program, it is possible that the action plan will be substantially incomplete, and HUD will require changes before approving the plan.

**Eligible Geographic Areas**: Identify which geographic areas (i.e., HUD-identified and/or grantee-identified MID areas) that may benefit from this program.

**Other Eligibility Criteria**: Identify any other known eligibility criteria established by the grantee for assistance (e.g., priority intake).

**Maximum Amount of Assistance Per Beneficiary**: Identify the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs.

**Maximum Income of Beneficiary**: Identify the maximum income (i.e., income cap) of any beneficiary receiving CDBG-DR assistance for direct-benefit activities.

**Mitigation Measures**: Describe what mitigation measures the grantee is incorporating to reduce the impacts of future disasters; note if this program will count towards a grantee’s CDBG-DR mitigation set-aside and if so, how it will meet the definition of mitigation activities.

**Reducing Impediments for Assistance**: Explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance.

**\*REPEAT AS NECESSARY FOR ADDITIONAL PROGRAMS**

## Infrastructure

### Infrastructure Programs Overview

|  |
| --- |
| Instructions: |
| Each grantee can use the table below for the infrastructure program(s) they are choosing to establish and can use the prompts below for each program within this category. As a reminder, HUD may disapprove or return an Action Plan or a portion of an Action Plan if it is inconsistent with the purposes of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703), if it is substantially incomplete, or if the certifications under section I.C.4. of the Universal Notice are not satisfactory to the Secretary in accordance with 24 CFR 570.304 or 570.485(c), as applicable. For example, if a grantee does not identify all information for the proposed program(s), it is possible that the program may not be approvable by HUD until a substantial amendment is reviewed and approved by HUD. |

**Table X: Grantee Infrastructure Programs Overview**

|  |  |  |
| --- | --- | --- |
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit |
| Infrastructure Program Number One | Enter value in terms of $ here. | Enter value in terms of % here. |
| Infrastructure Program Number Two | Enter value in terms of $ here. | Enter value in terms of % here. |
| Infrastructure Program Number Three | Enter value in terms of $ here. | Enter value in terms of % here. |
| *Add additional rows as needed.* | … | … |
| Infrastructure Program Total: | Enter value in terms of $ here. | Enter value in terms of % here. |
| Total | This value should be the same as the total grantee allocation for ‘infrastructure’, if not the grantee should identify the value of funds not allocated below. | Total the percentage of DR allocation amount which will benefit LMI individuals/areas. |

### Grantee Infrastructure Program Number One Template

**Program Title**: Add program title here.

**Amount of CDBG-DR Funds Allocated to this Program**: Identify how much funds you are allocating to this program here.

**Eligible Activity(ies)**: Identify eligible “infrastructure” activity.

**National Objective**: Identify the CDBG-DR national objective including only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement.

**Lead Agency and Distribution Model:** Identify the entity directly managing the program, and if different than the RE, its relationship type (i.e. subrecipient, contractor, other governmental entity of the RE by MOU). Additionally, each grantee must identify how it will distribute it’s grant funds by program type (e.g., direct implementation, method of distribution to local government or Indian Tribes, or a combination methodology).

**Program Description**: Provide program description here. This description should include a narrative of the program’s tie to the qualifying disaster, a connection to the unmet needs assessment, and anticipated program accomplishments. If any of these elements are omitted, this may not be an approvable program. Should a grantee not identify all information for the proposed program, it is possible that the action plan will be substantially incomplete, and HUD will require changes before approving the plan.

**Eligible Geographic Areas**: Identify which geographic areas (i.e., HUD-identified and/or grantee-identified MID areas) that may benefit from this program.

**Other Eligibility Criteria**: Identify any other known eligibility criteria established by the grantee for assistance (e.g., priority intake).

**Maximum Amount of Assistance Per Beneficiary**: Identify the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs.

**Maximum Income of Beneficiary**: Identify the maximum income (i.e., income cap) of any beneficiary receiving CDBG-DR assistance for direct-benefit activities.

**Mitigation Measures**: Describe what mitigation measures the grantee is incorporating to reduce the impacts of future disasters; note if this program will count towards a grantee’s CDBG-DR mitigation set-aside and if so, how it will meet the definition of mitigation activities.

**Reducing Impediments for Assistance**: Explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance.

**\*REPEAT AS NECESSARY FOR ADDITIONAL PROGRAMS**

## Economic Revitalization

### Economic Revitalization Programs Overview

|  |
| --- |
| Instructions: |
| Each grantee can use the table below for the economic revitalization program(s) they are choosing to establish and can use the prompts below for each program within this category. As a reminder, HUD may disapprove or return an Action Plan or a portion of an Action Plan if it is inconsistent with the purposes of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703), if it is substantially incomplete, or if the certifications under section I.C.4. of the Universal Notice are not satisfactory to the Secretary in accordance with 24 CFR 570.304 or 570.485(c), as applicable. For example, if a grantee does not identify all information for the proposed program(s), it is possible that the program may not be approvable by HUD until a substantial amendment is reviewed and approved by HUD. |

**Table X: Grantee Economic Revitalization Programs Overview**

|  |  |  |
| --- | --- | --- |
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit |
| Economic Revitalization Program Number One | Enter value in terms of $ here. | Enter value in terms of % here. |
| Economic Revitalization Program Number Two | Enter value in terms of $ here. | Enter value in terms of % here. |
| Economic Revitalization Program Number Three | Enter value in terms of $ here. | Enter value in terms of % here. |
| *Add additional rows as needed.* | … | … |
| Economic Revitalization Program Total: | Enter value in terms of $ here. | Enter value in terms of % here. |
| Total | This value should be the same as the total grantee allocation for ‘Economic Revitalization’, if not the grantee should identify the value of funds not allocated below. | Total the percentage of DR allocation amount which will benefit LMI individuals/areas. |

### Grantee Economic Revitalization Program Number One Template

**Program Title**: Add program title here.

**Amount of CDBG-DR Funds Allocated to this Program**: Identify how much funds you are allocating to this program here.

**Eligible Activity(ies)**: Identify eligible “economic revitalization” activity.

**National Objective**: Identify the CDBG-DR national objective including only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement.

**Lead Agency and Distribution Model:** Identify the entity directly managing the program, and if different than the RE, its relationship type (i.e. subrecipient, contractor, other governmental entity of the RE by MOU). Additionally, each grantee must identify how it will distribute its grant funds by program type (e.g., direct implementation, method of distribution to local government or Indian Tribes, or a combination methodology).

**Program Description**: Provide program description here. This description should include a narrative of the program’s tie to the qualifying disaster, a connection to the unmet needs assessment, and anticipated program accomplishments. If any of these elements are omitted, this may not be an approvable program. Should a grantee not identify all information for the proposed program, it is possible that the action plan will be substantially incomplete, and HUD will require changes before approving the plan.

**Eligible Geographic Areas**: Identify which geographic areas (i.e., HUD-identified and/or grantee-identified MID areas) that may benefit from this program.

**Other Eligibility Criteria**: Identify any other known eligibility criteria established by the grantee for assistance (e.g., priority intake).

**Maximum Amount of Assistance Per Beneficiary**: Identify the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs.

**Maximum Income of Beneficiary**: Identify the maximum income (i.e., income cap) of any beneficiary receiving CDBG-DR assistance for direct-benefit activities.

**Mitigation Measures**: Describe what mitigation measures the grantee is incorporating to reduce the impacts of future disasters; note if this program will count towards a grantee’s CDBG-DR mitigation set-aside and if so, how it will meet the definition of mitigation activities.

**Reducing Impediments for Assistance**: Explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance.

**\*REPEAT AS NECESSARY FOR ADDITIONAL PROGRAMS**

## Public Services

### Public Services Programs Overview

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| --- |
| Instructions: |
| Each grantee can use the table below for the public service program(s) they are choosing to establish and can use the prompts below for each program within this category. Should a grantee not identify all information for the proposed program(s), it is possible that the program may not be approvable by HUD until a substantial amendment is reviewed and approved by HUD. |

**Table X: Grantee Public Services Programs Overview**

|  |  |  |  |
| --- | --- | --- | --- |
| Eligible Cost Category | CDBG-DR Allocation Amount | % of CDBG-DR Allocation for LMI Benefit | Is this Program Exempt from the 15% Public Service Cap? |
| Public Services Program Number One | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| Public Services Program Number Two | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| Public Services Program Number Three | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| *Add additional rows as needed.* | … | … |  |
| Public Services Program Total: | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| Total | This value should be the same as the total grantee allocation for ‘Public Services’, if not the grantee should identify the value of funds not allocated below. | Total the percentage of DR allocation amount which will benefit LMI individuals/areas. |  |

### Grantee Public Services Program Number One Template

**Program Title**: Add program title here.

**Amount of CDBG-DR Funds Allocated to this Program**: Identify how much funds you are allocating to this program here.

**Eligible Activity(ies)**: Identify eligible “public service” activity.

**National Objective**: Identify the CDBG-DR national objective including only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement.

**Lead Agency and Distribution Model:** Identify the entity directly managing the program, and if different than the RE, its relationship type (i.e. subrecipient, contractor, other governmental entity of the RE by MOU). Additionally, each grantee must identify how it will distribute its grant funds by program type (e.g., direct implementation, method of distribution to local government or Indian Tribes, or a combination methodology).

**Program Description**: Provide program description here. This description should include a narrative of the program’s tie to the qualifying disaster, a connection to the unmet needs assessment, and anticipated program accomplishments. If any of these elements are omitted, this may not be an approvable program. Should a grantee not identify all information for the proposed program, it is possible that the action plan will be substantially incomplete, and HUD will require changes before approving the plan.

**Eligible Geographic Areas**: Identify which geographic areas (i.e., HUD-identified and/or grantee-identified MID areas) that may benefit from this program.

**Other Eligibility Criteria**: Identify any other known eligibility criteria established by the grantee for assistance (e.g., priority intake).

**Maximum Amount of Assistance Per Beneficiary**: Identify the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs.

**Maximum Income of Beneficiary**: Identify the maximum income (i.e., income cap) of any beneficiary receiving CDBG-DR assistance for direct-benefit activities.

**Mitigation Measures**: Describe what mitigation measures the grantee is incorporating to reduce the impacts of future disasters; note if this program will count towards a grantee’s CDBG-DR mitigation set-aside and if so, how it will meet the definition of mitigation activities.

**Reducing Impediments for Assistance**: Explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance.

**\*REPEAT AS NECESSARY FOR ADDITIONAL PROGRAMS**

## CDBG-DR Mitigation Set-Aside

### CDBG-DR Mitigation Set-Aside Programs Overview

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| Instructions: |
| For purposes of grants subject to the Universal Notice, mitigation activities are defined as those activities that increase resilience 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.  Grantees must explain how the risk-based assessment will inform the use of the CDBG-DR funds and identify if other sources of funding are available to address its identified mitigation needs. A grantee may choose to simply cite the current FEMA-approved HMP, CWPP, or other resilience or long-term recovery plan identify the planned mitigation programs, if there is a clear connection of programs and projects to the identified mitigation needs. Although the grantee must consider all hazards identified in its mitigation needs analysis, the grantee need not deploy CDBG-DR Mitigation Set-Aside funds to each identified hazard. The grantee should be able to demonstrate the prudency of funding allocations according to a data-based prioritization of the hazard response. |

**Table X: CDBG-DR Mitigation Set-Aside Allocation Summary**

| Eligible Cost Category | Unmet Need | % of Unmet Need | % of Funding to be Expended in HUD and Grante Identified MID | CDBG-DR Mitigation Set-Aside Allocation Amount | % of CDBG-DR Allocation Mitigation Set-Aside[[4]](#footnote-5) |
| --- | --- | --- | --- | --- | --- |
| Planning (15% cap) |  |  | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Housing | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Infrastructure | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Economic Revitalization | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Total | Enter value in terms of $ here. | Enter value in terms of % here. | Enter value in terms of % here. | Enter value in terms of $ here. | Enter value in terms of % here. |
| Funds that have not been allocated: | | | | Enter value in terms of $ here. | Enter value in terms of % here. |
| Grant Total (Recovery funds + Mitigation + Unallocated): | | | | This value should be the same as the total grantee allocation, if not the grantee should identify the value of funds not allocated below. | Enter value in terms of % here. |

**Table X: Grantee CDBG-DR Mitigation Set-Aside Programs Overview**

|  |  |  |  |
| --- | --- | --- | --- |
| Eligible Cost Category | CDBG-DR Mitigation Set Aside Allocation Amount | % of CDBG-DR Allocation for LMI Benefit | Does this Program have tie back to the disaster? |
| CDBG-DR Mitigation Set-Aside Standalone Program Number One | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| CDBG-DR Mitigation Set-Aside Standalone Program Number Two | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| CDBG-DR Mitigation Set-Aside Standalone Program Number Three | Enter value in terms of $ here. | Enter value in terms of % here. |  |
| *Add additional rows as needed.* | … | … |  |
| Total: | Enter value in terms of $ here. | Enter value in terms of % here. |  |

### Grantee CDBG-DR Mitigation Set-Aside Program Number One Template

**Program Title**: Add program title here.

**Amount of CDBG-DR Funds Allocated to this Program**: Identify how much funds you are allocating to this program here.

**Eligible Activity(ies)**: Identify eligible “standalone CDBG-DR Mitigation Set-Aside” activity.

**National Objective**: Identify the CDBG-DR national objective including only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement.

**Lead Agency and Distribution Model:** Identify the entity directly managing the program, and if different than the RE, its relationship type (i.e. subrecipient, contractor, other governmental entity of the RE by MOU). Additionally, each grantee must identify how it will distribute its grant funds by program type (e.g., direct implementation, method of distribution to local government or Indian Tribes, or a combination methodology).

**Program Description**: Provide program description here. This description should include a narrative of the program’s tie to the qualifying disaster, a connection to the unmet needs assessment, and anticipated program accomplishments. If any of these elements are omitted, this may not be an approvable program. Should a grantee not identify all information for the proposed program, it is possible that the action plan will be substantially incomplete, and HUD will require changes before approving the plan.

**Eligible Geographic Areas**: Identify which geographic areas (i.e., HUD-identified and/or grantee-identified MID areas) that may benefit from this program.

**Other Eligibility Criteria**: Identify any other known eligibility criteria established by the grantee for assistance (e.g., priority intake).

**Maximum Amount of Assistance Per Beneficiary**: Identify the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee’s disaster recovery programs.

**Maximum Income of Beneficiary**: Identify the maximum income (i.e., income cap) of any beneficiary receiving CDBG-DR assistance for direct-benefit activities.

**Mitigation Measures**: Describe what mitigation measures the grantee is incorporating to reduce the impacts of future disasters; note if this program will count towards a grantee’s CDBG-DR mitigation set-aside and if so, how it will meet the definition of mitigation activities.

**Reducing Impediments for Assistance**: Explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance.

**\*REPEAT AS NECESSARY FOR ADDITIONAL PROGRAMS**

# General Information

Citizen Participation

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| Instructions: |
| Grantees must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements). Each local government receiving assistance from a state grantee must follow its citizen participation requirements at 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements). The grantee’s records must demonstrate that it has notified affected residents through electronic mailings, press releases, statements by public officials, media advertisements, social media, public service announcements, and/or contacts with neighborhood organizations. |

### Consultation of Developing the Action Plan

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| Instructions: |
| All grantees must consult with states, Indian tribes, local governments, in the surrounding geographic area as applicable during Action Plan preparation to ensure consistency of the Action Plan with applicable regional plans. Grantees must consult with agencies that manage local Continuum of Care[[5]](#footnote-6), Public Housing Agencies[[6]](#footnote-7), and HUD-approved housing counseling agencies[[7]](#footnote-8), as applicable.  Grantees are encouraged to consult with other relevant Federal government partners and local government agencies, including state and local emergency management agencies that have primary responsibility for the administration of FEMA funds, as well as non-governmental organizations supporting community recovery. Grantees are encouraged to coordinate with State Housing Finance Agencies to verify that all available funding sources and opportunities for leverage are noted in the Action Plan. Given the extensive coordination that may be required to develop a grantee’s Action Plan, HUD recommends that grantees give their partners a clear timeline on receiving feedback and create a consistent process for how feedback will be received from these stakeholders. |

|  |  |
| --- | --- |
| Partners Consulted | Describe Consultation |
| Federal Partners (FEMA, SBA) |  |
| Local/State Government |  |
| Indian Tribes |  |
| Nongovernmental organizations |  |
| Private sector |  |
| State and local emergency management agencies that have primary responsibility for the administration of FEMA funds |  |
| Agencies that manage local Continuum of Care |  |
| Public Housing Agencies |  |
| HUD-approved housing counseling agencies |  |
| State Housing Finance Agencies |  |
| Other Stakeholders |  |

### 

### Public Comments

Following the creation of the Action Plan or substantial amendment, the grantee must publish the proposed Action Plan or substantial amendment for public comment. The manner of publication 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 Action Plan or substantial amendment (i.e., at least 30 calendar days). HUD encourages grantees to identify and redress any potential impediments that may limit or prohibit disaster-impacted individuals from providing public comment on the grantee’s Action Plan or substantial amendments.

### Public Hearings

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| Instructions: |
| HUD strongly encourages grantees to hold as many hearings or convenings as may be necessary to ensure they capture all citizen comments to inform the comprehensive development of their Action Plan. However, only those public hearings held following the publication of the Action Plan for public comment will count toward the minimum number of public hearings required (i.e., grantees must publish the Action Plan for public comment prior to meeting the minimum public hearing requirements provided below).  The minimum number of public hearings a grantee must convene on the Action Plan to obtain interested parties’ views and to respond to comments and questions shall be determined by the amount of the grantee’s CDBG-DR allocation: (1) CDBG-DR grantees with allocations under $20 million are not required to hold a public hearing; (2) CDBG-DR grantees with allocations equal to or greater than $20 million but less than $100 million are required to hold at least one public hearing; (3) CDBG-DR grantees with allocations equal to or greater than $100 million but less than $500 million are required to hold at least two public hearings; and (4) CDBG-DR grantees with allocations equal to or greater than $500 million shall convene at least three public hearings.    If the grantee is required to hold multiple public hearings, and a grantee holds those hearings in-person, it must hold each hearing in a different location within the HUD-identified MID area. Specifically, the grantee should select locations that will promote a geographic balance and maximize accessibility for stakeholders to actively participate. Grantees may convene public hearings virtually (alone, or in concert with an in-person hearing). All in-person hearings must be held within HUD-identified MID areas and in facilities that are physically accessible to persons with disabilities. When conducting a virtual hearing, the grantee must allow questions in real time, with answers coming directly from the grantee representatives to all attendees. |

#### Access to Public Hearings

Additionally, for both virtual and in-person hearings, the citizen participation plan must include how the grantee will complete the following: (1) hold hearings at times and locations convenient to potential and actual beneficiaries, (2) provide accommodations for persons with disabilities, and (3) to ensure effective communication for individuals with disabilities, including through the provision of auxiliary aids and services. See 24 CFR 8.6 for HUD’s regulations about effective communication. In addition, for both virtual or in-person hearings, the grantee shall provide reasonable notification and access for residents in accordance with the grantee’s certifications, timely responses to all citizen questions and issues, and public access to all questions and responses.

### Consideration of Public Comments

|  |
| --- |
| Instructions: |
| Grantees must provide a reasonable time frame (no less than 30 calendar days) and reasonable method(s) (including but not limited to electronic submission) for receiving comments on the Action Plan or substantial amendment. The grantee must consider all oral and written comments on the Action Plan or any substantial amendment. Any updates or changes made to the Action Plan in response to public comments should be clearly identified in the Action Plan. A summary of comments on the Action Plan or amendment, and the grantee’s response to each, must be included with the Action Plan or substantial amendment. Grantee responses shall address the substance of the comment rather than merely acknowledge that the comment was received. |

|  |  |
| --- | --- |
| Comment Received | Grantee’s Response |
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| *Add additional rows as needed.* | … |

### Citizen Complaints

Grantees should consider data sets that analyze affected Continuum of Care Entities, Point-in-time Count- type of shelters disaster (emergency shelter, transitional housing, unsheltered homeless), Point-in-time Count- impacted by the disaster (emergency shelter, transitional housing, unsheltered homeless).

## Modifications to the Action Plan

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| --- |
| Instructions: |
| Over the course of the grant there may be situations that cause grantee to modify the components of this Action Plan to adjust with our evolving disaster recovery needs. Such changes will result in either a substantial amendment or a nonsubstantial amendment to the Action Plan. |

### Substantial Amendment

|  |
| --- |
| Instructions: |
| Each grantee must specify criteria for determining what changes in the grantee’s Action Plan would constitute a substantial amendment to the Action Plan and thus require public comment. At a minimum, the following modifications will constitute a substantial amendment:   1. A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries (e.g., establishing a new grantee-identified MID area)); 2. The addition or deletion of an activity; 3. A proposed reduction in the overall benefit requirement (as described in section III.B.1.); 4. The allocation or reallocation of a reasonable monetary threshold specified by the grantee in its Action Plan; and 5. An update to the submitted initial Action Plan if the original submission was incomplete (i.e., program award caps or funding criteria). |

The grantee will include the required criteria that signifies a substantial amendments here. The substantial amendments must be numbered sequentially, have a 30-day public comment period, and posted on the grantee’s website. The grantee must also submit the substantial amendment to HUD for approval before the proposed changes in the amendment become effective.

### Nonsubstantial Amendment

The grantee will identify criteria for nonsubstantial amendments here. Nonsubstantial amendments include allocating or reallocating funding under the cap established by the grantee, nontechnical changes, and other administrative updates. The nonsubstantial amendments must be numbered sequentially and posted on the grantee’s website. The grantee must also notify HUD five business days before the amendment becomes effective. The Department will acknowledge receipt of the notification of nonsubstantial amendments via email within five business days.

## Performance Reports

Describe the process grantee will take to complete performance reports.

1. At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster. [↑](#footnote-ref-2)
2. Grantees are required to spend a minimum of 80% of their funds in the HUD identified MID areas. [↑](#footnote-ref-3)
3. Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries. [↑](#footnote-ref-4)
4. At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster. [↑](#footnote-ref-5)
5. Find your local Continuum of Care here: <https://www.hudexchange.info/grantees/>. [↑](#footnote-ref-6)
6. Find your local Public Housing Agency on HUD’s website here: <https://www.hud.gov/program_offices/public_indian_housing/pha/contacts>. [↑](#footnote-ref-7)
7. Find a HUD-approved housing counseling agency on HUD’s website here: <https://answers.hud.gov/housingcounseling/s/?language=en_US>. [↑](#footnote-ref-8)