

**Community Development Block Grant Disaster Recovery (CDBG-DR)
Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43)
Action Plan for Program Administrative Costs (PACs)
HUD Review Checklist**

Grantee Name:	
State:	
Date Plan Submitted:	
Total Grant Amount:	
Amount of PACs Budgeted:	
Grantee Contact (Name):	
Grantee Contact (Email/Phone):	
HUD Reviewer (Name):	
HUD Reviewer (Email/Phone):	

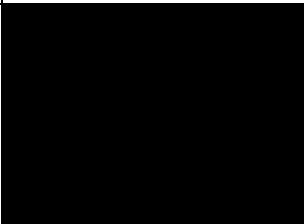
Criteria:	Yes	If yes, provide the page number	No
A. Public Notices and Comment Period Requirements			
Does the manner of publication of the Action Plan for Program Administrative Costs include the following requirements?			
1. Was the action plan or substantial amendment prominently posted on the grantee's official disaster recovery website?	<input type="checkbox"/>		<input type="checkbox"/>
2. Is the topic of disaster recovery on the grantee's website, including the posted action plan or substantial amendment, navigable by interested parties from the grantee's homepage?	<input type="checkbox"/>		<input type="checkbox"/>
3. Was the action plan or substantial amendment posted for comments for a minimum of 7 days?	<input type="checkbox"/>		<input type="checkbox"/>
4. Did the grantee offer multiple methods (including electronic submission) for receiving comments on the action plan or substantial amendment?	<input type="checkbox"/>		<input type="checkbox"/>
5. Did the grantee consider all oral and written comments on the action plan?	<input type="checkbox"/>		<input type="checkbox"/>
6. Did the grantee include a summary of the comments received on the action plan or substantial amendment and the grantee's	<input type="checkbox"/>		<input type="checkbox"/>

response to each comment with the action plan?			
7. For any comment received, did the grantee's response address the substance of the comment rather than merely acknowledge that a comment was received?	<input type="checkbox"/>		<input type="checkbox"/>
B. Proposed Allocation Of Funds			
8. Did the grantee list all proposed uses of funds for program administrative costs that may be incurred prior to submitting a Public Action Plan in Disaster Recovery Grant Reporting system?	<input type="checkbox"/>		<input type="checkbox"/>
9. Did the grantee include the amount budgeted for program administrative costs in the action plan? (less than 5% of the grant)	<input type="checkbox"/>		<input type="checkbox"/>
C. Eligibility of Activities			
10. Are the grantee's proposed activities for the use of funds for program administrative costs eligible activities? (activities listed at Section 105(a)(12) and (13) of the HCDA and in 24 CFR 570.205 and 570.206)	<input type="checkbox"/>		<input type="checkbox"/>
11. Has the Grantee met all the Requirements?	<input type="checkbox"/>		<input type="checkbox"/>
a. Describe the basis for conclusion:			

Certifications Checklist

Action Plan for Program Administrative Costs (PACs) HUD Review Checklist

Each grantee receiving a direct allocation in the Notice must make the following certifications:	Certifications included with the Action Plan for PACs?
b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.	<input type="checkbox"/>
c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice.	<input type="checkbox"/>
d. The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.	<input type="checkbox"/>
g. The grantee certifies that it is following 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 for this grant). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements).	<input type="checkbox"/>
i. The grantee certifies that it is complying with each of the following criteria: (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).	<input type="checkbox"/>

<p>(2) With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.</p> <p>(3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.</p> <p>(4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).</p>	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
<p>j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.</p>	<input type="checkbox"/>
<p>k. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require units of general local government (UGLGs) that receive grant funds to certify that they have adopted and are enforcing:</p>	

	(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and	<input type="checkbox"/>
	(2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.	<input type="checkbox"/>
l.	The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice.	<input type="checkbox"/>
p.	The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.	<input type="checkbox"/>
q.	The grantee certifies that it will comply with the provisions of Title I of the HCDA and with other applicable laws.	<input type="checkbox"/>

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

This checklist is part of the administrative record of the Department's review of a disaster recovery Action Plan for Program Administrative Costs submitted pursuant to The Supplemental Appropriations for Disaster Relief Requirements, approved October 29, 2021(Pub. L. 117-43). In using the checklist, reviewers are reminded that each of the criterion as stated on the checklist is necessarily an abbreviated and generalized summary of the more detailed requirements outlined in the Federal Register Notice for each criterion. Reviewer answers to each question on the checklist must be informed by applying the requirements of each criterion as outlined in the Federal Register Notice to each element of the Action Plan for Program Administrative Costs. Use of the checklist does not substitute comparison of the Action Plan for Program Administrative Costs submission against the requirements of the applicable Notices and making a determination based on the Standard of Review set forth in 24 CFR 91.500, as augmented by the applicable Notices.