

CDBG-DR Action Plan for All Grantees Subject to the Universal Notice

HUD's Office of Disaster Recovery Review Checklist

Version: 2.0

Published: March 2025



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of Disaster Recovery

Action Plan Review Sections

Instructions:	2
General Information for Action Plan Review	2
Section: Initial Action Plan - A. General Action Plan Requirements	3
Section: Initial Action Plan - B. Consultation and Citizen Participation	18
Section: Initial Action Plan - C. Conclusion	23
Section: Initial Action Plan – D. Certification Statements	25

Instructions

The purpose of this document is to provide guidance for Community Development Block Grant Disaster Recovery (CDBG-DR) grantees receiving allocations that are subject to the Universal Notice (“UN”) and applicable Allocation Announcement Notice (“AAN”) who will be submitting an initial Action Plan to HUD for review. Note, if the reviewer answers “No” to a question, it may trigger a pause or disapproval of the Action Plan.

General Information for Action Plan Review

Grantee Name:	Provide grantee name.	Date Plan Submitted:	Click or tap to enter a date.
Entity Designated to Administer the Funds:	Provide name of entity designated to administer the funds.	Date Plan Review was Paused if Returned to Grantee:	Click or tap to enter a date.
Amount of Funds Allocated in the Action Plan:	Provide the amount of funds allocated in the Action Plan.	Date Plan Review was Un-Paused when Returned to HUD:	Click or tap to enter a date.
Reviewer/Title:	Provide name and title of the review of the Action Plan	Final Date of Approval or Disapproval:	Click or tap to enter a date.
		Automatic Approval Date:	Click or tap to enter a date.

Section: Initial Action Plan - A. General Action Plan Requirements

Narrative: Does the Action Plan include the criteria for eligibility and how the use of funds will address long-term recovery, the impacts of the qualifying disaster, restoration of housing, infrastructure, economic revitalization, and the incorporation of mitigation measures in the most impacted and distressed (MID) areas? Specifically:

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	MOST IMPACTED AND DISTRESSED (MID) AREAS (I.C.1.a.(i).)		
(1)	<p>1.a. Does the proposed use of funds identified in the Action Plan currently show that at least 80 percent of the funds will be used to benefit the HUD-identified MID areas and no more than 20 percent will be spent in the grantee-identified MID area(s)?</p> <p>OR</p> <p>1.b. If required by the AAN, does the Action Plan currently show that 100 percent of the funds will be used in the HUD-identified MID areas?</p> <p>NOTE 1: HUD encourages grantees to consider using 100 percent of its award in HUD-identified MID areas since the data from these areas determined the amount of the award. If allowed, and the grantee does choose to spend a portion (up to 20 percent) of its award outside of the HUD-identified MID area, it must 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.</p> <p>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 in the AAN.</p> <p>NOTE 2: The reviewer must answer only the question above that is applicable to the grantee. If the answer to the applicable question is “No”, the reviewer should answer “No” for question 1.</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
(2)	<p>The following questions apply if the proposed use of funds will be spent in the grantee-identified MID areas:</p> <p>2.a. Does the Action Plan determine and identify where the grantee will use the remaining amount of the CDBG-DR award for the grantee-identified MID areas?</p> <p>2.b. Did the grantee-identified MID areas receive a presidential major disaster declaration identified by the disaster numbers listed in the applicable AAN?</p> <p>2.c. When identifying the grantee-identified MID areas, did the grantee use quantifiable and verifiable data in its analysis and reference it in its Action Plan?</p> <p>AND</p> <p>2.d. When identifying the grantee-identified MID areas, does the Action Plan indicate how the proposed use of funds will prioritize the remaining unmet needs for low-and moderate-income (LMI) individuals and areas?</p> <p>NOTE 1: If the answers to any of these questions are “No”, the reviewer should answer “No” for question 2.</p> <p>NOTE 2: The portion of the allocation used in the grantee-identified MID areas 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 area(s).</p> <p>NOTE 3: An “N/A” response is available here when a grantee is required to use 100 percent of their allocation in the HUD-identified MID area.</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	UNMET NEEDS ASSESSMENT (I.C.1.a.(ii).)		
(3)	<p>Does the unmet needs assessment:</p> <p>3.a. Describe the effects of the qualifying disaster(s) in the MID areas (i.e., HUD-identified and/or grantee-identified MID areas)?</p> <p>AND</p> <p>3.b. Describe the greatest remaining recovery needs for HUD-identified and grantee-identified MID areas that have not been addressed by other sources of funds (including insurance proceeds, other Federal assistance, or any other funding source, using appropriate data)?</p> <p>NOTE 1: If the answers to both questions are “No”, the reviewer should answer “No” for question 3.</p>		Choose an item.
(4)	<p>Does the unmet needs assessment evaluate the three core aspects of recovery—housing, infrastructure, and the economy (e.g., estimated job losses), which must consider the pre-disaster needs (e.g., a lack of affordable housing) that have been exacerbated by the disaster?</p> <p>NOTE: As noted in section III.D.1.a. (<i>Documenting a connection to the disaster</i>) of the UN, grantees must maintain records that document how each funded activity addresses a direct or indirect impact from the disaster. Grantees may do this by linking activities to a disaster recovery need that is described in the unmet needs</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	assessment in the Action Plan (requirements for the assessment are addressed in section I.C.1.a.(ii) of the UN). Sufficient documentation of physical loss must include damage or rebuilding estimates, insurance loss reports, images, or similar information that documents damage caused by the disaster. Sufficient documentation for non-physical disaster-related impacts must clearly show how the activity addresses the disaster impact, (e.g., for economic development activities, data about job loss or businesses closing after the disaster or data showing how pre-disaster economic stressors were aggravated by the disaster; or for housing activities, a post-disaster housing analysis that describes the activities that are necessary to address the post-disaster housing needs).		
(5)	<p>Does the assessment of housing needs address:</p> <ul style="list-style-type: none"> • emergency shelters, • interim and permanent housing, • rental housing and owner-occupied single family and multifamily housing, • 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)? <p>NOTE: If any of the types of housing listed are left out, the reviewer should answer “No” to question 5.</p>		Choose an item.
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	MITIGATION NEEDS ASSESSMENT (I.C.1.b.)		
(6)	Does the Action Plan:		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<p>6.a. Include a risk-based mitigation assessment that identifies 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) AND use the risks identified in the current FEMA-approved state or local Hazard Mitigation Plan(s) (HMP), Community Wildfire Protection Plan (CWPP), or other resilience or long-term recovery plans to inform the assessment?</p> <p>NOTE 1: 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. For example, if flooding is an identified hazard risk, does the grantee note how it will mitigate against that risk in its chosen programs?</p> <p>NOTE 2: 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>OR</p> <p>6.b. Cite the current FEMA-approved HMP or CWPP, or other resilience or long-term recovery plan to address the mitigation needs assessment by providing a direct link to the plan in the mitigation needs assessment section of the Action Plan AND make that plan available on its public website?</p> <p>NOTE 3: If the grantee cites the current FEMA-approved HMP, CWPP, or other resilience or long-term recovery plan to address the mitigation needs assessment under question 6.b., there must be a clear connection between programs and projects and mitigation needs in the MID areas.</p>		

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	NOTE 4: For the reviewer to answer “Yes” for Question 6, either 6.a. or 6.b. must be a “Yes”.		
	HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later): Please add a written explanation to justify the decision made.		
	CONNECTION OF PROGRAMS AND PROJECTS TO UNMET NEEDS AND MITIGATION NEEDS (I.C.1.c.)		
(7)	<p>Does the Action Plan:</p> <p>7.a. Demonstrate a reasonably proportionate allocation of resources relative to areas and categories (i.e., housing, economic revitalization, infrastructure) of greatest needs identified in the grantee’s unmet needs and mitigation needs assessments?</p> <p>OR</p> <p>7.b. If the Action Plan does not demonstrate a reasonably proportionate allocation of resources relative to areas and categories (i.e., housing, economic revitalization, infrastructure) of greatest needs identified in the grantee’s unmet needs and mitigation needs assessments, does the grantee provide an acceptable justification for a disproportional allocation?</p> <p>NOTE 1: Grantees should clearly identify how their allocation is proportionate to unmet needs. If the grantee’s allocation is not reasonably proportionate, the grantee must state the reason and provide an acceptable justification (e.g., the grantee did not have accurate or available data and why, or there are local or state funds available to fund certain types of programs).</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	NOTE 2: If the answer to either 7.a. OR 7.b. is “Yes”, the HUD reviewer can answer “Yes” to question 8.		
(8)	Does the Action Plan 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?		Choose an item.
(9)	<p>Does the Action Plan provide a clear connection between a grantee’s identified unmet needs, mitigation needs, and its proposed programs and projects that benefit the MID areas (i.e., HUD-identified and/or grantee-identified MID areas)?</p> <p>NOTE 1: Grantee expenditures for eligible unmet needs outside of the HUD-identified or grantee-identified MID areas are allowable, provided that the grantee can demonstrate how the expenditure of CDBG-DR funds outside of the MID areas will address unmet needs identified within the HUD-identified or grantee-identified MID area.</p> <p>NOTE 2: For the HUD reviewer to answer “Yes” to this question, the HUD reviewer must first answer “Yes” to questions 7 and 8.</p>		Choose an item.
(10)	Does the Action plan describe the reasonable efforts the grantee made to minimize displacement of persons or entities, assist any persons or entities displaced, and ensure accessibility needs of displaced persons with disabilities?		Choose an item.
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	ALLOCATION AND AWARD CAPS (I.C.1.d.)		

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
(11)	<p>Does the grantee's action plan include a high-level budget for the full amount of the CDBG-DR allocation, that describes at the most practical level, how funds are budgeted for administration, planning, housing, infrastructure, and economic revitalization (e.g., by program, subrecipient, grantee-administered activity, or other category)?</p> <p>NOTE: Grantees must comply with expenditure caps for administration and planning, and public services. Administration expenditures are subject to the five (5) percent cap, plus five (5) percent of the program income generated (as described in section III.B.3. <i>Administration cap</i>), planning expenditures are subject to the fifteen (15) percent cap (as described in section III.B.4. <i>Planning cap</i>). The grantee's budget should be consistent with the requirements to integrate hazard mitigation into all its programs and projects that involve construction. Grantees are encouraged but not required to budget for any planned public service activities.</p>		Choose an item.
(12)	<p>Does the Action Plan provide a description of the disaster recovery programs to be funded, including the CDBG-DR eligible activity types and national objectives associated with each program?</p> <p>NOTE: Eligible activities are only those allowed under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement in applicable <i>Federal Register</i> notices.</p>		Choose an item.
(13)	<p>Does the Action Plan identify the Responsible Entity assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4?</p> <p>NOTE: State grantees who exercise HUDs environmental review responsibilities must follow the requirements per 24 CFR 58.4(b)(2) and 24 CFR 58.18.</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
(14)	Does the Action Plan identify which geographic areas (i.e. HUD-identified and/or grantee-identified MID) that may benefit from CDGB-DR funds?		Choose an item.
(15)	Does the Action Plan explain how the grantee will identify and then reduce impediments that individuals face or may face to access assistance?		Choose an item.
(16)	<p>If the appropriations act that funded the grantee's award includes additional funds for mitigation, does the Action Plan identify how the proposed use of any CDBG-DR mitigation set-aside funds will meet the definition of mitigation activities (as described in section I.C.1.b. <i>Mitigation needs assessment</i>)?</p> <p>NOTE 1: For purposes of grants subject to the UN, 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.</p> <p>NOTE 2: An "N/A" option is available for this question <i>if</i> the appropriations act that funded the grantee's award does not include additional funds for mitigation.</p>		Choose an item.
(17)	<p>Does the Action Plan describe the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the grantee's disaster recovery programs?</p> <p>NOTE: 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.f. (<i>Protocols for substantial amendments</i>) of the UN) once the information is known. 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. If the grantee is choosing to submit this information at a later date, then the HUD reviewer should</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	answer “No” and then include in its notes that the grantee’s Action Plan may be eligible for only partial approval. Any notification that the Action Plan is only partially approved must include language that until a substantial amendment with the required information is submitted and approved by HUD, the grantee cannot awards funds to applicants.		
(18)	<p>Does the Action Plan describe the process it will use to make exceptions to the maximum amount of assistance (i.e., award cap), when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities?</p> <p>NOTE: 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.f. (<i>Protocols for substantial amendments</i>) of the UN) once the information is known. See note above on question 17 for more information on partial approvals.</p>		Choose an item.
(19)	<p>Does the Action Plan describe any other known eligibility criteria the grantee will establish (for example – priority intake for LMI households)?</p> <p>NOTE: “N/A” is an available option for this question if the grantee does not identify any other known eligibility criteria.</p>		Choose an item.
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	ALLOCATIONS OF CDBG-DR FUNDS LESS THAN \$20 MILLION (I.C.1.d.(i))		
(20)	<p>Did the grantee receive an allocation of less than \$20 million for a qualifying disaster(s), and propose to allocate its funds solely to address unmet affordable rental housing needs (or unmet infrastructure needs that contribute to the long-term recovery and restoration of housing) caused by or exacerbated by the disaster(s) even though that's a disproportional allocation of resources relative to its areas of greatest unmet needs and mitigation needs?</p> <p>NOTE 1: For grantees receiving an allocation of less than \$20 million for a qualifying disaster(s), HUD will consider the small size of the grant and HUD's allocation methodology as acceptable justification for a grantee to propose a disproportional allocation when the grantee is allocating funds to address (1) unmet affordable rental housing needs in a MID area caused by or exacerbated by the disaster(s) that incorporates mitigation, or (2) unmet infrastructure needs necessary to build affordable rental housing in a MID area that incorporates mitigation.</p> <p>NOTE 2: If a grantee's allocation is \$20 million or more, the HUD reviewer can note an "N/A". Additionally, if a grantee with less than \$20 million is not proposing a disproportional allocation of resources relative to its greatest unmet need, the HUD reviewer can note an "N/A".</p>		Choose an item.
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	FUNDING CRITERIA (I.C.1.e.)		
(21)	Does the Action Plan describe how the grantee will distribute its grant funds, either through:		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<ul style="list-style-type: none"> • Direct implementation (through employees, contractors, or through subrecipients); or • A method of distribution to local governments and Indian tribes (for states, as permitted by III.C.4. Waiver and alternative requirement for distribution to CDBG metropolitan cities and urban counties (state grantees only)); or • A combination of a direct implementation model and a method of distribution model. <p>NOTE: HUD reviewers should keep in mind that grantees must spend at least 80 percent of the CDBG-DR award to benefit the HUD-identified MID area or 100 percent depending on the grantee's requirement, and this should be demonstrated in the Action Plan as the grantee describes its funding criteria.</p>		
(22)	<p>For funds that are subgranted to eligible entities (either as sub-grants through a method of distribution or from applications that the grantee solicits directly for programs to be carried out directly), does the Action Plan describe all criteria used to allocate and award the funds including the relative importance of each criterion (and priorities)?</p> <p>NOTE: An "N/A" option is available for this question if the grantee is not proposing to subgrant its funding.</p>		Choose an item.
(23)	<p>For funds that are subgranted to eligible entities (either as sub-grants through a method of distribution or from applications that the grantee solicits directly for programs to be carried out directly), does the Action Plan establish the maximum grant size available?</p> <p>NOTE: An "N/A" option is available for this question if the grantee is not proposing to subgrant its funding.</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
(24)	<p>For funds that are subgranted to eligible entities (either as sub-grants through a method of distribution or from applications that the grantee solicits directly for programs to be carried out directly), does the Action Plan describe how the distribution and selection criteria will address disaster-related unmet needs or mitigation needs in the MID areas?</p> <p>NOTE: An “N/A” option is available for this question if the grantee is not proposing to subgrant its funding.</p>		Choose an item.
(25)	<p>For funds that are subgranted to eligible entities (either as sub-grants through a method of distribution or from applications that the grantee solicits directly for programs to be carried out directly), does the Action Plan describe the steps the grantee will follow to encourage the participation of disaster impacted persons in the MID areas?</p> <p>NOTE 1: For the HUD reviewer to answer “Yes” to question 25, the grantee must include an assessment describing the following: (1) who may be expected to benefit, (2) the timing of who will be prioritized, and (3) the amount or proportion of benefits expected to be received.</p> <p>NOTE 2: If some of the funding criteria required in questions 21 to 24 are unknown 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.f. (<i>Protocols for substantial amendments</i>) of the UN) once the information is known. 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. If the grantee is choosing to submit this information at a later date, then the HUD reviewer should answer “No” and then include in its notes that the grantee’s Action Plan may be</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<p>eligible for only partial approval. Any notification that the Action Plan is only partially approved must include language that until a substantial amendment with the required information is submitted and approved by HUD, the grantee cannot award funds to applicants.</p> <p>NOTE 3: An “N/A” option is available for this question if the grantee is not proposing to subgrant its funding.</p>		
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	PROTOCOLS FOR SUBSTANTIAL AMENDMENTS (I.C.1.f.)		
(26)	<p>Does the Action Plan specify criteria for determining what changes would constitute a substantial amendment to the Action Plan and thus require public comment?</p> <p>NOTE 1: At a minimum, the criteria must identify the following modifications as constituting a substantial amendment:</p> <ul style="list-style-type: none"> • A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries (e.g., establishing a new grantee-identified MID area)); • The addition or deletion of an activity; • A proposed reduction in the overall benefit requirement (as described in section III.B.1. (<i>Overall Benefit requirement</i>) of the UN); • The allocation or reallocation of a reasonable monetary threshold specified by the grantee in their Action Plan; and • An update to the submitted initial Action Plan if the original submission was incomplete as allowed under section I.C.1.d paragraph 7 and section I.C.1.e. 		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<p>NOTE 2: If any of the minimum criteria above are missing from the grantee's Action Plan the HUD reviewer should answer "No" to this question.</p> <p>NOTE 3: Generally, once a grantee has set a reasonable monetary threshold in which a reallocation or allocation of funds would constitute a substantial amendment, grantees cannot disregard this threshold by submitting multiple nonsubstantial amendments back-to-back in order to avoid following a substantial amendment process (e.g., submitting two budget reallocations within 30 days of each other that taken together would require a substantial amendment).</p>		

Section: Initial Action Plan - B. Consultation and Citizen Participation

Narrative: Does the Action Plan include the following information:

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	REQUIREMENT FOR CONSULTATION DURING PLAN PREPARATION (I.C.2.a.)		
(27)	Does the Action Plan demonstrate that during the Action Plan preparation the grantee consulted with states, Indian tribes, and local governments in the surrounding geographic area to ensure consistency of the Action Plan with applicable regional redevelopment plans?		Choose an item.
(28)	<p>Did the grantee consult with agencies that manage local Continuums of Care, Public Housing Agencies, and HUD-approved housing counseling agencies, as applicable, during Action Plan preparation?</p> <p>NOTE 1: 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 non-governmental organizations supporting community recovery.</p> <p>NOTE 2: Grantees are also 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.</p>		Choose an item.
(29)	<p>Does the grantee demonstrate in the Action Plan that all the required consultation has taken place?</p> <p>NOTE: For the HUD reviewer to answer “Yes” to this question, the HUD reviewer must first answer “Yes” to questions 27 and 28.</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	PUBLICATION OF THE ACTION PLAN AND OPPORTUNITY FOR PUBLIC COMMENT (I.C.2.b.)		
(30)	<p>Did the grantee prominently post the Action Plan on their official disaster recovery website for public comment for at least 30 calendar days?</p> <p>NOTE 1: The grantee’s records must also 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.</p> <p>NOTE 2: Grantees are encouraged to identify and redress any potential impediments that may limit or prohibit disaster-impacted individuals from providing public comment on the Action Plan. For example, grantees may consider how to address impediments like lack of childcare and/or transportation that can limit individuals from participating in public hearings, providing comments, or other engagement events or techniques.</p>		Choose an item.
(31)	<p>Did the grantee hold the appropriate number of public hearings based on the size of its CDBG-DR grant?</p> <p>NOTE 1: 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:</p>		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions		Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))										
	<table border="1"> <thead> <tr> <th>CDBG-DR Grant Value</th> <th>Minimum Public Hearing Requirement</th> </tr> </thead> <tbody> <tr> <td>< \$20 Million</td> <td>No public hearing requirement</td> </tr> <tr> <td>≥\$20 Million but <\$100 Million</td> <td>One (1) public hearing required</td> </tr> <tr> <td>≥ \$100 Million but < \$500 Million</td> <td>Two (2) public hearings required</td> </tr> <tr> <td>≥\$500 Million</td> <td>Three (3) public hearings required</td> </tr> </tbody> </table> <p>NOTE 2: Grantees may find they need additional hearings to adequately capture and address all citizen questions, concerns, and comments and are encouraged to hold as many hearings as may be necessary to ensure all citizen comments are captured to inform the comprehensive development of their Action Plan. Grantees must indicate that the required hearings were met during the 30-day public comment period (i.e., after the Action Plan was posted on the grantee’s website)</p> <p>NOTE 3: An “N/A” option is available for this question if the CDBG-DR grant value is less than \$20 million.</p>		CDBG-DR Grant Value	Minimum Public Hearing Requirement	< \$20 Million	No public hearing requirement	≥\$20 Million but <\$100 Million	One (1) public hearing required	≥ \$100 Million but < \$500 Million	Two (2) public hearings required	≥\$500 Million	Three (3) public hearings required		
CDBG-DR Grant Value	Minimum Public Hearing Requirement													
< \$20 Million	No public hearing requirement													
≥\$20 Million but <\$100 Million	One (1) public hearing required													
≥ \$100 Million but < \$500 Million	Two (2) public hearings required													
≥\$500 Million	Three (3) public hearings required													
(32)	<p>If the grantee was required to hold more than one public hearing, and the grantee chose to hold in-person public hearings, did the grantee demonstrate that it held each hearing in a different location within the HUD-identified MID area, and in locations that the grantee determines will promote geographic balance and maximum accessibility for stakeholders to actively participate?</p> <p>NOTE: An “N/A” response is acceptable for this question if the grantee was not required to hold more than one public hearing or it did not hold in-person hearings and instead chose virtual hearings.</p>			Choose an item.										

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
(33)	<p>If the grantee chose to hold virtual public hearings, did the grantee demonstrate that it allowed questions in real time, with answers coming directly from the grantee representatives to all “attendees”?</p> <p>NOTE: An “N/A” response is acceptable for this question if the grantee did not hold virtual public hearings.</p>		Choose an item.
(34)	<p>If the grantee chose to hold in-person public hearings, were hearings held in facilities that were physically accessible to persons with disabilities?</p> <p>NOTE: An “N/A” response is acceptable for this question if the grantee did not hold in-person public hearings.</p>		Choose an item.
	<p>HUD Reviewer Comments/Notes – Basis for Conclusion if Any “No” Responses (include AP page numbers for reference later):</p> <p>Please add a written explanation to justify the decision made.</p>		
	CONSIDERATION OF PUBLIC COMMENTS (I.C.2.c.)		
(35)	<p>Did the grantee 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?</p> <p>NOTE: For example, a reviewer could select “Yes” to this question if a grantee notified the public about the Action Plan through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations</p>		Choose an item.
(36)	If the grantee received comments:		Choose an item.

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Grantee Action Plan Page Number	HUD Reviewer Response (Yes, No, or N/A (if allowable))
	<p>36.a. Does the grantee identify in their Action Plan how it considered all oral and written comments on the Action Plan by including a summary of all comments and the grantee's responses to each comment in the Action Plan?</p> <p>AND</p> <p>36.b. Did the grantee identify updates or changes made to the Action Plan in response to public comments?</p> <p>NOTE 1: Grantee responses shall address the substance of the comment rather than merely acknowledge that the comment was received.</p> <p>NOTE 2: An "N/A" option is available for this question if the grantee did not receive any public comments, however, the HUD reviewer should question why that is and ensure that the grantee identified impediments to be removed to ensure that it received some public feedback.</p>		

Section: Initial Action Plan - C. Conclusion

Narrative: Does the Action Plan include the following information:

	HUD Review Questions	Notice Reference	HUD Reviewer Response
(37)	CONCLUSION: Based on the HUD reviewer's responses to the questions in sections A and B of this checklist, does the grantee include sufficient information in its Action Plan so that all interested parties will be able to understand and comment on the Action Plan?	I.C.5.	Choose an item.
(38)	COMPLETE AND COMPLIANT: Based on the reviewer's responses to the questions in this checklist, is the Action Plan complete and in compliance with the <i>Federal Register</i> notices governing the use of these funds?	I.C.5.	Choose an item.
(39)	SUBMISSION OF SF-424: Did the grantee include the SF-424 (including SF-424B and SF-424D, as applicable) and certifications included in Appendix B with its Action Plan?	I.C.3.	Choose an item.
(40)	<p>APPROVED, RETURNED, OR DISAPPROVED: Is the Action Plan being Approved, Returned, or Disapproved? Choose an item.</p> <p>NOTE 1: If the HUD reviewer is approving the Action Plan, please finalize your notes and save this file for the official Administrative Record.</p> <p>NOTE 2: If the HUD reviewer is returning the Action Plan so the grantee can address the noted deficiencies, please document the Reason for the Return below, provide written notice of return of the Action Plan to the grantee, and note the date the Action Plan is returned to the grantee (i.e., which day in the 45-calendar day review period (but no later than day 20)), and follow the process for noting what day (in the 45-calendar day review period) the review period is paused – complete the dates on page 1 to ensure this is noted accurately in the checklist; return to the checklist when the grantee has</p>	Please add a written explanation to justify the decision made.	

HUD Review Form - Universal Notice Action Plan

	HUD Review Questions	Notice Reference	HUD Reviewer Response
	<p>submitted subsequent materials, and then move forward to either Approve or Disapprove the Action Plan.</p> <p>NOTE 3: If the HUD reviewer is disapproving the Action Plan, please document the Reason for the Disapproval below and save this file for the official Administrative Record. Within 15 calendar days after HUD notifies a grantee that it is disapproving its Action Plan, it must inform the jurisdiction in writing of the reasons for disapproval and actions that the jurisdiction could take to meet the criteria for approval. After the first notification of disapproval, the grantee must revise or resubmit the Action Plan within 45 calendar days. HUD must respond to approve or disapprove the Action Plan within 30 calendar days of receiving the revisions or resubmission.</p>		

Section: Initial Action Plan – D. Certification Statements

Narrative: Each grantee receiving an allocation under the applicable *Federal Register* notices and Universal Notice must make the following certifications:

- 1.) For local government grantees: include the list below (included in Appendix B of the Universal Notice) and the certifications listed at [24 CFR 91.225\(a\)\(1\),\(a\)\(3\), and \(a\)\(7\)](#); and 24 CFR 91.225(b)(5),(b)(6), (b)(7), and (b)(8); OR
- 2.) For state grantees: include the list below (included in Appendix B of the Universal Notice) and the certifications listed at [24 CFR 91.325\(a\)\(1\),\(a\)\(3\), and \(a\)\(7\)](#); and 24 CFR 91.325(b)(5),(b)(6), and (b)(7).

	APPENDIX B. Certifications Waiver and Alternative Requirement	HUD Reviewer Response (Yes or No)
	<p>Uniform Relocation Act and Residential Anti-displacement and Relocation Plan – The grantee certifies that it:</p> <p>(1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR 24, as such requirements may be modified by waivers or</p> <p>a. alternative requirements;</p> <p>(2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR 42, and 24 CFR 570, as amended by waivers and alternative requirements.</p>	Choose an item.
	<p>Authority of Grantee: 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</p> <p>b. 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 as modified by waivers and alternative requirements.</p>	Choose an item.
	<p>Consistency with the Action Plan - The grantee certifies that activities to be undertaken with</p> <p>c. CDBG-DR funds are consistent with its action plan.</p>	Choose an item.
	<p>Citizen Participation-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 waivers and</p> <p>d.</p>	Choose an item.

	APPENDIX B. Certifications Waiver and Alternative Requirement	HUD Reviewer Response (Yes or No)
	alternative requirements). 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 waivers and alternative requirements).	
e.	Consultation with Local Governments (STATE ONLY) -State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG-entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.	Choose an item.
f.	Use of Funds -The grantee certifies that it is complying with each of the following criteria: (1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 <i>et seq.</i>). (2) Maximum Feasibility Priority. 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. (3) Overall benefit. 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 (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons. (4) Special Assessment. 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	Choose an item.

HUD Review Form - Universal Notice Action Plan

	APPENDIX B. Certifications Waiver and Alternative Requirement	HUD Reviewer Response (Yes or No)
	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).	
g.	Grant Timeliness- 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 applicable to the use of grant funds.	Choose an item.
h.	Order of Assistance- The grantee certifies that it will comply with the statutory order of assistance listed at Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.	Choose an item.
i.	For Local Governments - 24 CFR 91.225(a)(1),(a)(3), and (a)(7); and 24 CFR 91.225(b)(5),(b)(6), (b)(7), and (b)(8); or For States - 24 CFR 91.325(a)(1),(a)(3), and (a)(7); and 24 CFR 91.325(b)(5),(b)(6), and (b)(7).	Choose an item.