



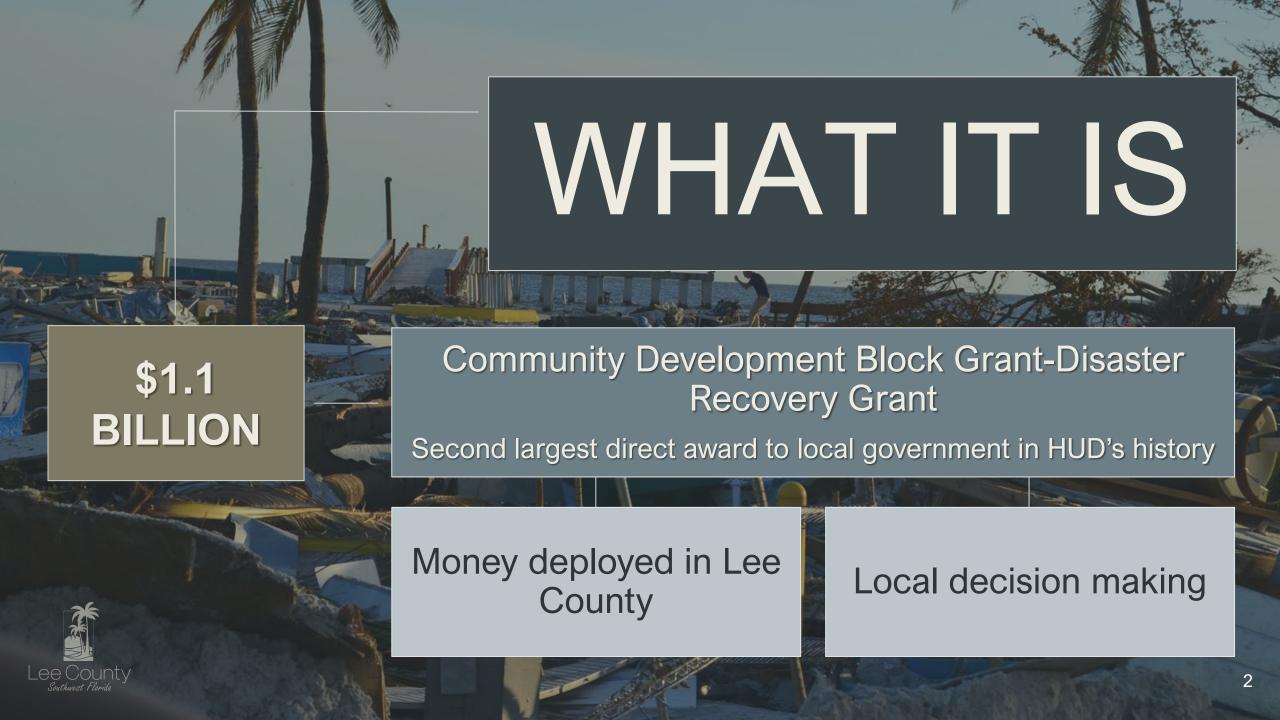


## Hurricane Ian Recovery

### HUD'S CDBG-DR GRANT



Lee County Board of County Commissioners May 25, 2023



### WHAT IT ISN'T

#### Panacea

✓ Unmet community needs greatly exceed funding



### Blank Check

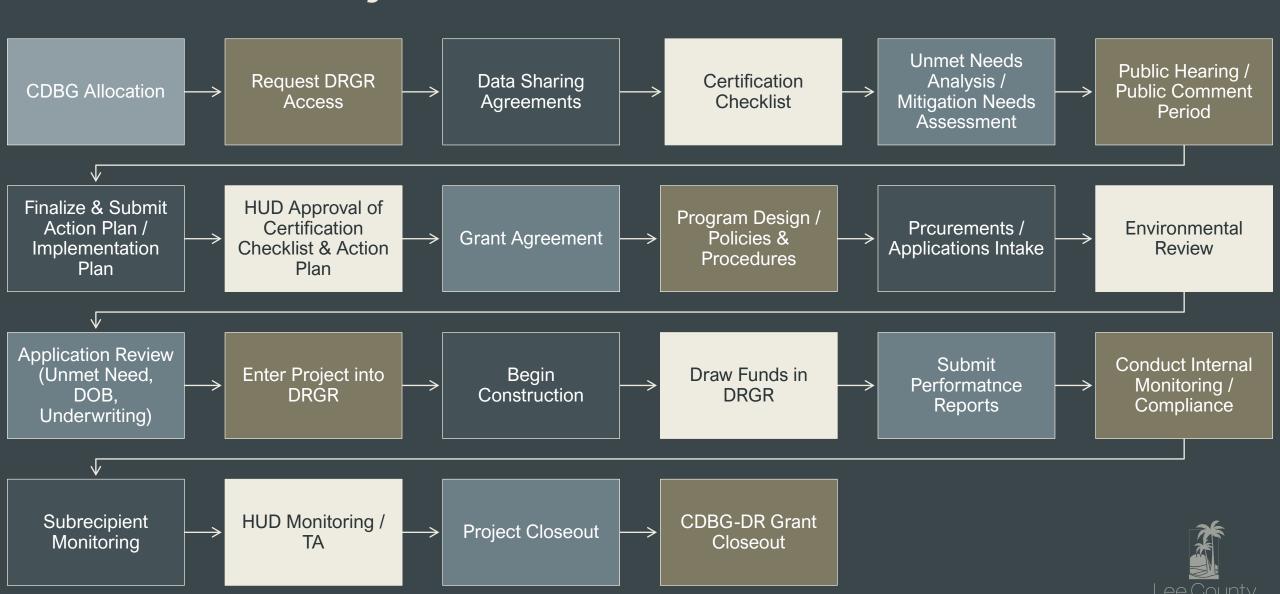
- ✓ HUD restricts how money can be used
- ✓ Prioritizes low & moderate income (LMI) persons & geographies



#### Lee County must:

- ✓ Design/implement programs
- ✓ Establish internal controls
- Ensure project eligibility
- ✓ Monitor subrecipients
- ✓ Provide technical assistance
- ✓ Ensure timely fund expenditure

### Life Cycle of a CDBG-DR Grant





## OVERVIEW

**CDBG-DR Activity Requirements** 



Address disaster-related impacts (direct or indirect) in a Presidentially-declared area

2

Be a CDBG eligible activity



Meet a CDBG national objective:

- Benefit low & moderate income (LMI) persons or households
- Eliminate slum & blight
- Meet an urgent need or imminent threat



Incorporate resiliency measures in any construction activity



## OVERVIEW

CDBG-DR Activity Requirements
Continued





70% of CDBG-DR funds must be used to benefit LMI populations

Area	Median Family Income	Category	Persons in Family							
			1	2	3	4	5	6	7	8
Cape Coral - Fort Myers, FL MSA	\$85,000	Very Low Income (50%)	29,800	34,050	38,300	42,550	46,000	49,400	52,800	56,200
		Low Income (80%	47,700	54,500	61,300	68,100	73,550	79,000	84,450	89,900



### Housing **Public Facilities / Administration** Infrastructure **Economic Planning** Revitalization **Public Services**

### Additional Considerations

#### Mitigation Set-Aside

- ❖ Additional 15% for mitigation activities that increase resilience & reduce long-term risk = \$144,506,000
- ❖ No "tie-back" required to Hurricane lan
- Because grantees must incorporate "mitigation" activities as part of the overall recovery, HUD expects grantees to go well over 15%. However, any activities over the 15% cap must have "tie-back" to the disaster.

#### **Period of Performance**

Six years from execution of grant award



## Lee County Allocation

FEMA Disaster No.

Grantee

Allocation of Unmet Needs PL 117-328

Set-Aside PL 117-328

Total Allocation

Total Allocation

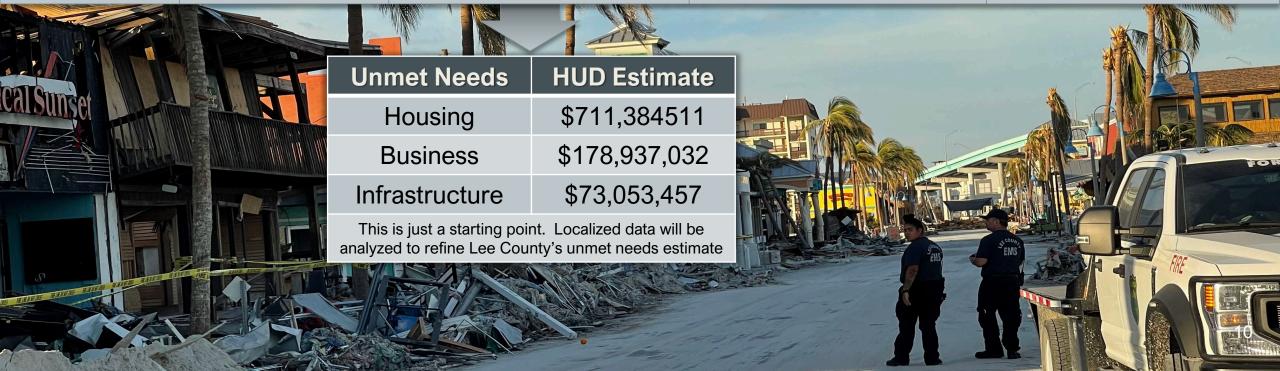
\$4673

Lee County

\$963,375,000

\$144,506,000

\$1,107,881,000



## CDBG-DR PROCESS

 Approves CDBG-DR Appropriation

Congress

### HUD

- Calculates & Announces Allocations
- Publishes a Notice in the Federal Register
- Awards CDBG-DR Funds

- Administers CDBG-DR Program Directly; or
- Distributes Funds to Subrecipients or Subgrantees

State & Local Governments



### CDBG-DR PROCESS

#### **Process**

#### **Start Up**

#### **Operations**

#### **Close Out**

- HUD allocates CDBG-DR funds to state or locality
- Complete required pre-award checklists and certifications and submit to HUD
- Execute data sharing agreements with FEMA & SBA
- Complete unmet needs analysis and Action Plan including outreach and public comment

- Grant agreement executed between HUD & CDBG-DR grantee
- Policies, procedures, forms, and organizational plans developed
- Financial & reporting systems set up
- Activity set up in DRGR
- Staff & partners hired, selected, and/or procured
- Environmental review
- Duplication of benefits analysis

- Communications & outreach to citizens & applicants
- Programs & projects completed (e.g. construction)
- DRGR draws and financial and contract management
- Monitoring & compliance, including fraud prevention
- Reporting & data quality assurance

- Ongoing monitoring & compliance, including fraud prevention
- Activity & project close out
- Recordkeeping, reporting, and data quality assurance
- Conduct final duplication of benefits analysis
- Monitor spending to ensure sufficient LMI benefit





## TIMELINE

Action	2023
Federal Register Notice Published	May 18
Federal Register Applicability Date	May 23
Financial & Grant Mgt Certifications	Jul 21
Public Action Plan Submitted to HUD	Sep 20
Implementation Plan Submitted	Sep 20
HUD Review	Nov 19



#### **ACTION PLAN**

Impact & unmet needs assessment to inform the use of the grant;

Description of connection of programs & projects to the unmet needs;

Descriptions of public housing, affordable rental housing, and housing for vulnerable populations;

Assessment of fair housing using civil rights data & advancing equity;

Description of infrastructure investments;

Description to minimize displacement;

Description of applicable allocation and award caps;

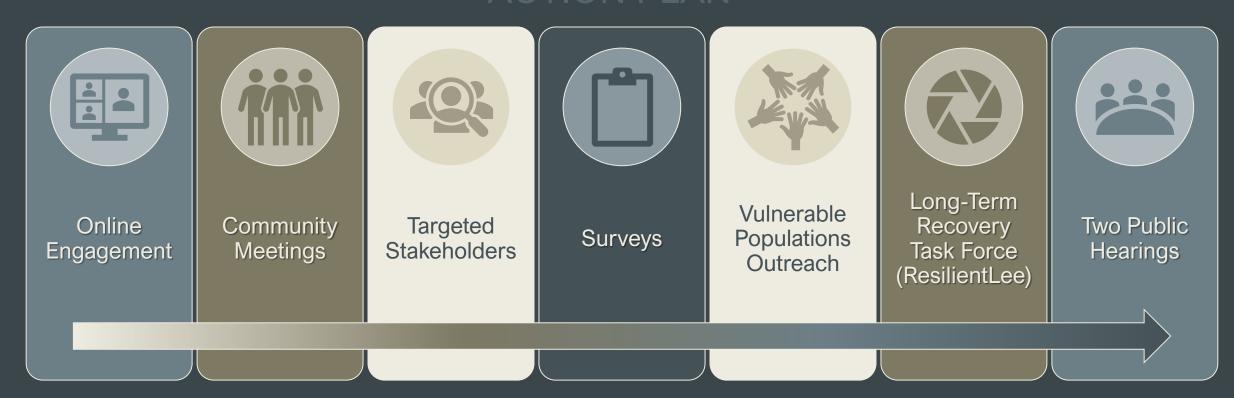
Standards of cost controls and warranties; and

Resilience planning.



## Public Process

#### ACTION PLAN





## ONGOING PROCESS



#### Action Plan Amendments



As more information is compiled, needs will change



The Action Plan will be amended occasionally



Substantial amendment = 30-day public comment period



A change in program benefit or eligibility criteria



Addition or deletion of an activity



Proposed reduction in overall benefit requirement

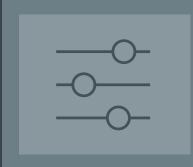


Allocation or reallocation that constitutes a change of 5% or greater of a program budget



### IMPLEMENTATION

WHAT TO EXPECT



Staggered Funding Opportunities



Technical Assistance



#### **Phased Projects**

- LMI Prioritization
  - Possible Waivers or Alternative Requirements



# MORE INFORMATION

#### **HUD Tool**

https://sites.hudexchange.info/cdbg-dr-consolidated-notice/general-overview-cdbg-dr-overview/

### Lee County

https://www.leegov.com/recovery/cdbg-dr