

**CDBG-DR and CDBG-MIT Grantee-Led Sessions**

**9: Overcoming the Biggest Challenges with Federal Emergency  
Management Agency (FEMA) Match**

**Thursday, April 1, 2021**

Scott Ledford: Thanks again, Paul, and welcome, everybody, to the final session of the 2021 CDBG-DR and CDBG-MIT virtual training series. It's actually really hard to believe this is the last one. Your HUD hosts, the presenters for this series, my co-host Olivia, and I all hope you have found this format helpful and useful.

Just being here means you clicked on the right link. So there's no more need to cover those logistics. A final reminder, though, that the presenters will cover their content through its conclusion, and then we'll start the Q&A portion of the session. But we do still continue to encourage you to submit questions throughout the session through the Q&A box.

We're also going to have a brief closing by HUD at the end of this session. So let's introduce the presenters who are going to share with you their experience in overcoming the biggest challenges with FEMA match.

Calvin is the senior assistant director at the New York City Mayor's Office of Management and Budget where he heads the team overseeing CDBG-DR and national disaster resilience funds that the city received in response to Hurricane Sandy.

He's been with New York City OMB for over 17 years with experience including economic development, city planning, capital projects, workforce development, and grants management. One of his current strong interests is ensuring that vulnerable communities are prepared to mitigate risks associated with climate hazards.

Olivia Healey: It's my pleasure to introduce Amber. Amber is a unit head for the Systems and Reporting Management Team on the CDBG-DR Task Force at the New York City Mayor's Office of Management and Budget. She has been with NYC OMB for four years, including her previous role where she directed Hurricane Sandy FEMA grant closeout efforts citywide.

Amber is currently responsible for managing reimbursement strategies for the CDBG-DR and CDBG-NDR grants, coordinating internal and external reporting, overseeing the management of public facing websites, and acting as the primary administrator for internal databases and systems. She also directs internal document management and closeout strategies.

With that said, it's my pleasure to hand the presentation over to Calvin to get us started with this content for today.

Calvin Johnson: Very good. Thank you. And then, first of all, I want to say to, Olivia, Scott, ICF, HUD, it really is an honor to be able to present and participate in this online training series. And for me, it's been a delight to see a lot of familiar faces giving presentations. And we are more than happy to be presenting on the concluding presentation.

So just in the way of a little bit of background for New York City and our CDBG-DR funds, we received \$4.2 billion of DR and \$176 million of NDR funding under appropriation PL113-2 in response to Hurricane Sandy.

Hurricane Sandy -- take us a little bit back in time -- hit New York City and the East Coast October 29th, 2012. Impacts across multiple states, by all means. Just focusing on New York City impacts, 51 square miles in the city were flooded. Almost 90,000 building structures flooded or damaged. 10 percent of the population of New York City, so almost 900,000 individuals, lived in the inundation area.

Looking at housing stock, about half the housing stock that was damaged was outside of the 100-year flood plain. And in the flood plain, about half of homeowners had flood insurance. Power losses, loss of life and economic activity loss and damages totaling estimates of \$19 billion.

Absolutely, a strong partnership between New York City at the local level and the federal government to address Sandy recovery needs. In addition to CDBG-DR funding that the city received as a direct grantee as an entitlement community, we're also recipients of public assistance funding through FEMA.

And just to give you some context, about \$10.7 billion for recovery work from FEMA consisting of emergency services that we think of as funds flowing through our expense or operating budget. It's about \$1.8 billion and funds for permanent work, longer-term capital projects, repair, reconstruction, and mitigation, \$8.9 billion.

The funds from FEMA flow to the city of New York through the state of New York, and the CDBG-DR funds flow to the city of New York directly from HUD. So there's a little bit of coordination that happens there.

Within OMB, our office, as the city's Budget Office administers both the FEMA funding and the CDBG-DR funding for this particular disaster. And it allows us to coordinate within the same office across different divisions and to have an integrated approach to management of funds to address recovery needs.

It is challenging, though. So we will talk about the challenges of using CDBG-DR to address FEMA match. And then in the context, out of our \$4.2 billion, about \$900 million of that is either going directly towards covering FEMA match or towards projects that were also receiving FEMA funds in excess and outside of what FEMA was paying for.

To translate things into the parlance of FEMA, there are project worksheets or PWs, which you can think of as individual grants. The cities received 734 different PWs through FEMA for Sandy recovery. We're aligning CDBG-DR funding with 54 of those. And one of the things then to see there is we're not going after everything, and we can talk about why not and the strategies around how to be selective in identifying what FEMA funded projects are best aligned for receiving CDBG-DR funds as well.

And then outside of projects receiving project worksheets, there's the Section 404 Hazard Mitigation Grant program where we're aligning match as well.

Just to frame what allows for match, I'm going to start with Federal Register notice and piggyback off of earlier presenters have said too is, look at your Federal Register notices.

For our first Sandy recovery notice, it lays out particular terms in how CDBG-DR funds can be used to address match requirements. I would also reference the Code of Federal Regulations 24 CFR 570.207(G) describes the eligibility of using CDBG-DR to pay for nonfederal cost share as well.

In addition to the regs, there are other standard things that govern the use of funds, particularly regarding duplication of benefits as outlined in the Stafford Act. I think as all of you know, CDBG-DR is a gap filler. So where there are other recovery sources of funding available and there are remaining gaps, unmet need, that's when the CDBG-DR can come in.

Similarly, crosscutting requirements tied to federal funds across a variety of regulations apply, including NEPA, Davis Bacon Related Acts and other things. And then, as always, for use of funds -- for what governs use of funds with CDBG-DR, look to the regulations HUD has issued, including waivers and alternative guidance. Every disaster is unique in terms of particular rules that apply to it.

So now, understanding how match is allowable, there are many considerations we took into account in terms of how we applied CDBG-DR funds to cover match, and that informed a very pragmatic and strategic approach.

So, first of all, thinking about a concept that many of you might have heard under the term flexible match or flex match -- we've called coordinated match as well -- is this notion that FEMA and HUD don't necessarily look at recovery costs in the same way.

FEMA, in issuing a grant, will usually reimburse for a percentage of total eligible costs. And they look at total expenditures, and they will reimburse a grantee or a subgrantee for that percentage.

For HUD, HUD wants to know particularly what activities CDBG-DR funds are spent on. And generally, there's a fair amount of flexibility within how you do this, provided you're ensuring there's no duplication of benefits and provided you're assuring that you're not using HUD funding to pay for work that is HUD ineligible.

So we look at applying the HUD funds really at an aggregate level for a particular project, not at a line-by-line level. So we're not paying for 90 percent of each and every item within FEMA PW with HUD funds -- or 10 percent, rather, the HUD funds. We're saying here's the particular costs and charges that match the dollar funds.

It's also important, as I framed there, to recognize that not every cost that is eligible for FEMA reimbursement will be eligible for HUD reimbursement. And, similarly, just because a cost is CDBG-DR eligible, there might be something FEMA deemed ineligible. But you can nevertheless use CDBG-DR funds to cover it, provided, again, you've done that duplication of benefits determination and eligibility review as well.

In New York City our local match structures were generally across the board for the FEMA public assistance funds. It was a 10 percent match. So FEMA was 90 percent reimbursement. For the HMGP program, 25 percent match share.

And where the city of New York was in relation to FEMA funding is the city was covering the match requirement directly ourselves. We did not receive state contributions to pay that, but recognizing there are different models for covering match writ large.

To frame some challenges with the alignment of two funds from -- two sources of funding from two federal agencies, some of the primary challenges are around timelines. HUD funding is not necessarily available right away. HUD funding also comes with certain deadlines. FEMA funding also comes with deadlines, but there's more flexibility, and it's not uncommon for major permanent work repair projects to be ongoing for a significant period of time past when the HUD funds have an expiration date.

Additionally, as described, there are hundreds of individual FEMA project worksheets in our particular situation, many of which are quite small, and there is an administrative calculation to say, if there is fixed costs in reviewing every PW for eligibility or environmental review for doing the financial processing, if your administrative costs exceed your local match amount, it might not be a PW that's worth going towards.

And there's a requirement -- or a challenge around calculating match as a percent of total, if a project worksheet FEMA grant changes to reimburse eligible costs dependent upon what those actual costs are. So there's a bit of a moving target where you might not know what 10 percent is until far down the line.

And then another thing to be aware of is the procurement requirements for FEMA and HUD have different standards. So when you're looking at your contracts, it's not adequate just to say, great. One agency paid for it. Let's look at the -- then we're fine for the other.

So some of the solutions we've had to address these challenges have been around targeting certain FEMA PWs. The Cat A work speaks to emergency costs. Those happen sooner. We will give some particular examples of the case studies where we've been successful in targeting some of that work. Similarly, FEMA can't be -- the other category -- sorry. Cat A and B is emergency.

Other categories for FEMA are for longer-term permanent work. And some of those projects have timelines where you -- it's advantageous to match them with CDBG-DR dollars, and some of them aren't worth pursuing.

Additionally, within New York City, we've had a lot of success in matching CDBG-DR funds to the FEMA for 28 grants, which are capped grants. I recognize there might be other challenges for other jurisdictions in that, but the nice thing about having a capped grant where you know the entirety of the funding will be spent is you can calculate your match requirements.

And then other things we've done, too, particularly around procurement in regards to Davis Bacon, is worked with Department of Labor, for example, seeing if there is a contract or work

that has been FEMA funded. As long as that work is still ongoing at the time at which HUD funding has been identified for the project, all of the HUD requirements do apply. But that means if a project is not actively ongoing, there's different courses that you could pursue. And one of the things we want to really recommend is coordinate with your federal partners.

So speaking of coordination and just honing in on a couple of concepts in terms of what constitutes success and what's been successful for us, is first thinking about this notion of integration of different funds and looking at the disaster holistically and writ large.

CDBG-DR as gap filler means that you need to know what else is there that has addressed other existing needs. Just because we're two different divisions who work closely within the same office doesn't mean that that's not a model that can be replicated.

So if you are all direct CDBG-DR grantees and FEMA funds flow through other state agencies or other organizations, you can still have the same integrated approach, even if people are sitting in different offices.

How you have that integrated approach is through what we call the three C's, collaborate, coordinate, communicate. All of this is work that doesn't happen in a vacuum. It's not work that happens magically or instantaneously. It's work that happens through picking up the phone and making calls, by scheduling meetings, by finding venues to say, how do we share in successes? How do we talk to each other speaking the same language, even if different agencies in different funding streams have slightly different cultural practices?

You work hard at it. And one of the ways that's critical on -- critical for sharing and collaborating is by relying on data and systems management. So we're going to talk a little bit about that in the presentation and have seen some of you have had questions around data systems too.

So with that said, we're now going to cover a couple of particular case studies, and I'm going to hand this off to my colleague Amber, who will walk you through our first couple of examples of how we've applied match for particular projects.

Amber Lynn: Great. Thank you, Calvin. So I'm going to go through two case studies with the group today, and the two that we're going to start with on my end are both related to emergency work.

So as Calvin mentioned, there's a number of grants across the FEMA portfolio for Hurricane Sandy. So with about 734 grants, there were determinations that needed to be made both early on and over time about what we would be able to match against.

So in the area of debris removal, that was one of these sort of other city service areas that we were looking at with particular interest. With relation -- with -- as it relates to the timeline for expenditures, these were costs that were incurred very early on, if not pre-award. So this was an area where we were taking a look at what the scope of the cost would be and what the eligibility would look like.

So in the case of debris removal, the FEMA PA portfolio for New York City spans a variety of city agencies. The example that we're walking through here is for the Department of Parks and Recreation. But there were a number of other city agencies that also incurred debris removal costs. So those would all fall under the Category A FEMA PA model. And here you can see there's 2.3 million cubic yards of debris that needed to be removed citywide.

So what our match looked like here was there was a \$14.3 million FEMA PW for the Department of Parks and Recreation that was essentially a grant that rolled up debris removal costs across a variety of different sites, across various boroughs citywide. And we were looking at about \$1.4 million in our local match.

So what we're looking at here is we had a real advantage because we were localized within the mayor's Office of Management and Budget. And what that looked like internally was that we had, not only the task force groups that focused on both CDBG-DR grant management and FEMA grant management, but also the agency budgetary task forces.

So in a case of debris removal at that scope and that level, we were able to coordinate actively with the various contacts from both the agencies and their budgetary representatives within OMB. So as we're budgeting costs and monitoring the costs that come in, we're able to see which ones are potentially eligible for FEMA or CDBG-DR or both.

So for a grant of this scale, where it's at today is that it's a multi-site, multi-version PW. The way that FEMA PA works is, for these sort of inclined grants, you're able to version them as costs are adjusted. So that can be removing scope. That can be adding eligible scope as it's discovered after the storm. And what we were able to do by managing this centrally and by using our sort of grants management system and our cost tracking methods, we were able to keep an eye on the costs as they increased.

So, as Calvin had kind of alluded to earlier, there are a number of different grant structures within FEMA. Some of them are easier to do cost tracking against than others. For 428, if it's capped, it's very easy to see what 10 percent of that would look like at the beginning and decide exactly what will be matching against.

But for a more complex debris removal project like this that's actually spanning a number of different parks owned sites across New York City, we need to stay in constant communication with both the FEMA taskforce, the agency, as well as the budgetary group so that we can monitor costs as they continue to rise.

So that central coordination not only helped in the early days of tracking the costs as they're coming in and drawing the CDBG-DR funds, but also it helped us to prepare for closeout.

So as we're seeing the project change over time and we're seeing the version amounts come into the system as they're adjusted, we are able to go in on our end and make cost adjustments as needed to what we're matching. So, as we need -- as there was additional money added to the FEMA grant, we were able to kind of increase what we're matching up to that 10 percent.

And then, likewise, this -- because it was a very early grant, this is one that could be looked at for closeout earlier than some of those very, very large infrastructure projects that Calvin had mentioned earlier. For Sandy, there were a number of those. But with this emergency work -- framework, there was also a lot of money there that we could kind of look into and start organizing documents on the early side.

So the next project that I'm going to talk about is also within the category of emergency work. This was a Category B project. So this is emergency protective measures. And this was really interesting because it was a very innovative project at the time. This was a public assistance grant for sheltering temporary essential power. And, basically, this allowed homeowners and residents of New York City to shelter in place.

So as you may have guessed, Hurricane Sandy was a very unique disaster because we were not able to have the same kind of flexibility or the same sheltering model as a number of other cities that might have had additional space for FEMA shelters, FEMA trailers, things like that.

In this case, we had a number of residents that were without power and would have otherwise had to leave their home, if we were not able to provide this kind of essential power model so that they could remain where they were. So this was seen as kind of a cost savings measure and a way to make it much easier for New York City residents to kind of stay put until those permanent repairs could be made.

So as you can see here, it was heat, hot water, and electricity that we were primarily focused on. It was over 20,000 housing units in under 100 days. It was a very, very massive scale program. And this is one of the ones that CDBG-DR was able to match against.

So as I mentioned, this was a very large-scale project. You can see here the total project cost was about \$639 million. So this was another one of the claims that was adjusted over time. So because, again, it was that model of in-kind repair or in-kind project costs, we were able to track the cost over time, and the FEMA taskforce within OMB coordinated with us, the budgetary task forces, and other stakeholders, such as State Homeland Security, to work on versioning this with FEMA as needed, as costs increased or additional costs needed to be adjusted.

So this was another case where we were able to, through close coordination with the FEMA group, identify which costs we would like to match against. And as Calvin kind of alluded to earlier, there's two different types here. I guess there's sort of three. There's the one where FEMA and CDBG-DR could both match against it. It's eligible in both cases.

And then there were some FEMA ineligible costs that, for one reason or another, through policy discussions with FEMA Region 2, it was determined that they would not be eligible for FEMA public assistance. So some of those we were able to check against our own eligibility standards and apply the local match to those.

Likewise, there were some cases where we needed to run through it and make sure that it was actually eligible for CDBG-DR because some of those might need to get swept into either FEMA funding or city funding.



So in this case, with David Bacon we were able to take a look at this on a case-by-case basis, look at the actual requirements for these units, whether it's a multi-unit, single unit. We were able to take a look at it and see whether Davis Bacon applies and whether we're able to meet those standards.

So we were able to apply this more rigorous review on the front end, which was great because we were able to kind of isolate the population that would be CDBG-DR funded fairly early on. And you can see that here reflected by the HUD funding amount for about \$97 million.

Yeah. And then just the last point. As with the earlier emergency work and as with any other grant, being able to coordinate on the early end with central and house management allowed us to kind of collect and organize documents in a way that just made it much easier as we moved into closeout. And this grant is one that is going through FEMA closeout at the moment.

Calvin Johnson: All right. Thank you, Amber. I'm going to cover the last two case studies and then hand back to Amber to do a quick review of data systems.

So looking at an example of a capital project, the Rockaway Boardwalk was heavily damaged and flooded out during Sandy. For the total project, it was 5.6 million -- or excuse me -- 5.6 miles of boardwalk that were ultimately reconstructed and resiliency measures integrated so that the repaired boardwalk was above the flood plain and other resiliency measures, including steel supported concrete deck and other control features -- erosion control features.

The project received an \$480 million FEMA 428 capped grants, and we used CDBG-DR funding in the amount of \$48 million to fulfill the local match requirement for that. And some of what we took into account in terms of how to do this, we were really trying to be innovative in terms of partnering between FEMA and HUD to tie into both funding sources.

So, first, on Environmental Review, as I mentioned, NEPA is one of the requirements for CDBG-DR dollars, obviously. Our appropriation allows us to piggyback off of FEMA environmental reviews in general, and that's a great innovation and savings and efficiency -- for efficiency. It means you don't need to duplicate efforts.

For this particular project, actually, though, we didn't do that. We sort of flipped it where the city of New York, as the CDBG-DR grantee, conducted an environmental assessment, with FEMA signing on as a cooperating agency. And so there are different tools that you can deploy to make sure you're meeting compliance requirements and advancing work.

This was a project which was one of the earlier capital reconstruction projects. And it meant that, when we were issuing our contracts, we had developed contract writers for FEMA funding and for CDBG-DR funding and integrated them into the procurements and contracts for this particular project proactively.

And then, additionally, we're applying the HUD funding up front to cover early costs associated with the boardwalk explicitly and complete -- and once the boardwalk was completed, we've

fulfilled the match requirement. We've met the national objective from HUD's perspective, and where there's a balance of 428 funds, those are reinvested to other projects in the community. But the HUD requirements don't necessarily apply to those other projects. We've already fulfilled the entirety of the HUD funding requirements.

Another example that we want to discuss is regarding the New York City Housing Authority, or NYCHA, the city's public housing authority. NYCHA received \$3 billion through FEMA funds. And in our action plan, we have allocated towards them \$317 million of DR.

There are 32 different public housing development campuses citywide where CDBG-DR dollars are applied, and we're mostly using those funds to cover design work and select construction work, particularly at the locations where work is occurring sooner rather than later.

And the way we're able to do this is by looking at the FEMA grants to be consolidated across multiple sites and framing it as one big macro award. And because, for this particular instance, it's a 428 capped grant using flexible match, we had flexibility in terms of how to apply the HUD funding.

Now, the NYCHA case provides a couple of interesting examples around governance, and, again, what we do here is having additional communication. So the CDBG-DR funding flows from HUD to the city of New York as the direct grantee, to NYCHA as the subgrantee.

FEMA funding flows from FEMA to the state to NYCHA, bypassing the city, meaning that very often we in the CDBG-DR division where the conduit of information for our FEMA colleagues, we would share information continuously and take a collaborative approach.

In terms of compliance, because NYCHA is a public housing authority governed under many, many, many HUD regulations through PIH Division, a lot of the compliance requirements are already addressed regarding Section 3, Fair Housing, Davis Bacon. It made the match easier to perform.

And here this is an example where FEMA actually took the lead on the environmental review, and then we, using HUD funds, were able to adopt that environmental approval. And one of the things here, though, I want to iterate, and it's come up in some of the other presentations, is CDBG-DR does offer an opportunity to innovate.

So here we're using DR funding for costs that FEMA's not paying for, one of which is a workforce development program so that NYCHA residents can get job training to participate and be engaged in the construction of work at their own residences.

And another point, too, is there's really been an evolution of uses here. What we thought we were going to be doing with CDBG-DR funding for NYCHA originally was much more limited in scope, not knowing the full extent to which FEMA funding would be available. And there was continuous work to maximize FEMA investments, and that then allowed us to be strategic and reprioritize HUD funding and collectively do much more than we might have been able to with an initial investment.

And, now, I will give it back to Amber to quickly run through our data systems and how we used those to facilitate recovery.

Amber Lynn: Great. Thanks, Calvin.

So we have a number of systems that we use in-house to basically track our projects. So this is not just cost tracking. This is also project management, reimbursement, tracking, a number of different things across both of the grants.

As we mentioned, we work with the mayor's Office of Management and Budget. So we do kind of have this budgetary background to begin with. So what we've gone with is a QuickBase web platform, and this is a real benefit to us because it's a platform that's shared both by the FEMA taskforce and the CDBG-DR taskforce. So while we have slightly different modules, we're able to share data across both systems.

Another benefit of managing this centrally through a budget office is that we're able to overlay an understanding of the city's financial data. So the way that our system is structured is, essentially, it pulls financial data directly from the New York City financial management system.

So for mayoral agencies, when their costs are incurred, we're able to track those against various budget codes and then pull them directly into our system. So there's a couple of different ways that we use that for FEMA versus CDBG-DR. But, essentially, as we're seeing grant related costs come in, we can vet them, ensure that they are actually grant related, and then tag them to the appropriate program area or PW, if you're on the FEMA side. So that financial data is really our primary data source.

In addition to that, we use it for project management. And you can see here we're able to kind of track this against various reimbursements. So, as you can imagine, one of the challenges that we have here is ensuring that we're not reimbursing over the cap or, if we're approaching closeout, that we're reaching that 10 percent amount.

So we're able to kind of track both revenue that's coming back into city coffers for both FEMA and for DR. So, as Calvin mentioned, the FEMA relationship is slightly different because the requests for reimbursement go through State Homeland Security. But we're able to track them both against the same project so we can see total project cost for all of the Sandy projects.

So here's an example of that. What you can see up on the screen is just one of our simple tables that we use to track the amount of revenue that's come in. So we kind of have a number of different layers, but one of the main layers here is how much we've actually been reimbursed or how much federal money we've received.

So because the FEMA obligations are treated slightly different from the way that we handle the reimbursements on the HUD side, this is really critical for us to make sure that we're hitting that 10 percent spot on.

So for the case of this grant, which is an infrastructure grant for the Trust for Governors Island, we're able to see how much has been drawn to date from CDBG-DR. So this is all processed by us, all the ones that are listed as draw request. And then you can see at the bottom there's a progress payment, and that's essentially the incremental reimbursement structure that was agreed upon by New York State Homeland Security.

So we can see not just the federal funding that we've received here and drawn today, but we can also see how much FEMA has brought back in. And this is a good way for us to track progress, because, with the nature of FEMA PA being slightly different, we can see how far along they are in their projects.

So by having all this data in one central location, we can go in from time to time and see all of the grants that we match against, and we're able to see exactly how much has been expended to date for each of these projects and then how much is left to collect. And with those amounts, that's where we on the DR side can focus our reimbursements to make sure that we're going to hit that cap. And then on the FEMA side, that can be a red flag for them or a green flag, depending on how much is left there, because in some cases, if they're running up against it, that might be a sign that they need to do a version.

So, as Calvin had flagged earlier, we have these 428 grants, which are much simpler to track. So the one that's up on the screen is a 428. So we know exactly how much the 10 percent is. But for some of these projects that have a variety of different versions with ever-changing costs, having it all in one data system is really critical for us to make sure that things don't get lost across all of the different agencies that we're matching against.

And then I'll just finish with one lesson learned that we had here. All of our systems were implemented after the fact. Documentation is one of the ones that was implemented a little bit later on. There were a number of other document structures, but the document management system that we've been using for Sandy costs is one that's been a real help and a good innovation. But as we're coming on later this year, I guess nine years after the storm, this is one of those items that is really helpful to stand up earlier on.

So, for us, because we are with a budget organization, sweeping an older financial data into the grants management system was less of a lift. But for documentation, because there is such a significant volume, even if we are sharing it between both FEMA and CDBG-DR and we're able to kind of swap the relevant documentation, it's a big lift to get things sort of organized for closeout retroactively.

So that's one of the areas where the grants management system has been great in terms of tracking reimbursement documentation. But for other program documentation that's been retained along the way, having it organized in a central location, and then for as much -- as much as it's feasible for other grantees, if you can kind of try to share that in a central location with other FEMA partners, it just makes it a lot easier to track your match. And that's been one of our big lessons learned here, both in terms of closeout preparation and monitoring.

Calvin Johnson: All right. I think to just reiterate key components of success, again, is integration. Look at your recovery holistically across all funding streams, collaborate, coordinate, communicate, and use your data systems. And I think at this point now we are going to Q&A.

Scott Ledford: All right. Great. Q&A time. Thanks very much for the interesting presentation, and, actually, I will give you some feedback from one of the attendees first.

It says, "This was an excellent presentation, and thank you for talking about this topic. I want to ask about your interagency coordination. Where were your obstacles to that coordination at first? Did your agency speak the same cost language before the event, or did you have to find that common ground as you went?"

Calvin Johnson: Thank you for the question. Yeah. I'll start.

I think one of the advantages we have through our model, recognizing there are a lot of different jurisdictional models for managing federal funds for recovery, is that we are all within the Office of Management and Budget, and we take a financial approach. And financial responsibility is a key piece of what we do. So we kind of, in our management of the funds, start with shared language.

I think from a timing perspective, FEMA funding for Sandy recovery for New York City started flowing much earlier than HUD funding did. And it took a little bit of an adjustment to realize like, oh, HUD is not just FEMA part two. HUD is actually a different agency with different requirements, with funds intended for different purposes. And so there was a little bit of learning around that.

That said, there were also some good sharing of best practices. So FEMA is not an agency that is heavy on monitoring, but the monitoring we did with HUD was that, hey, you know what? This is something that can be replicated there. But to say, well, what is monitoring to begin with, so that there was a bit of an education component. But it was helpful to, at least from a financial management perspective, start with speaking the same language.

Olivia Healey: Thanks, Calvin. We have another question that came in just for clarification.

"Has New York used the CDBG-MIT match program, or were these all examples for CDBG-DR?"

Calvin Johnson: Good question. All for CDBG-DR. And we're not using our NDR grant for match, and we're not actually a recipient of CDBG-MIT funding, though I would imagine a lot of the principle -- the same principles would apply.

And I think one of our kind of quick things to continuously think about is the regulations govern the use of funds. It's the same underlying supporting regulations the Federal Register notices also support, how much is performed and just thinking every grant, every disaster has its own set of

regs. So you might just be looking at different documents, but it's the same kind of concept of what to look at to help inform how you would do it.

Scott Ledford: Great. Thanks again. So another question about coordination.

"For attendees who do not currently coordinate with other agencies, where would you suggest they start? Are there some natural fits that are best to develop first versus other agencies that could be folded into the conversation later?"

Calvin Johnson: And I'm assuming the question is mostly around with other federal agencies or thinking about as being a CDBG-DR grantee and then talking to other offices within your state or your locality.

Scott Ledford: Yeah. I think the latter. It's about the interagency coordination again.

Calvin Johnson: Great. I mean, this is sort of a theme that came up in earlier presentations too is, the more legwork you've done in advance to a disaster, the easier it is to recover.

If you have a culture of your emergency management office and your community development office know how to get in touch with each other when they do and have had previously existing relationships, it's much easier to build off those relationships than it is to create them from scratch.

I also think -- so if you haven't been hit by a disaster yet, do that coordination now. Know who your colleagues are in your economic development agencies or your housing agencies or your public housing authorities and have existing relationships. And to the extent you don't have them, then pick up the phone and start making calls. We found, through grant management and federal funds, going budget office to budget office is a great way to start. But it's about that communication.

Olivia Healey: Another question that we got in the box for today was, "How were you able to facilitate that cooperating agency relationship with FEMA for the Rockaway project so that it was timely and avoid duplication of effort? It's been my experience that FEMA wants to be the lead and they're willing to cooperate but early coordination can be a challenge because of their internal processes."

Calvin Johnson: Let me start on this one, and then, Amber, I might tap on you too.

I think where we were for New York City at the time is the 428 grant process was new, and FEMA was looking for pilots to make sure they had a program that was going to be successful. And so there was an interest to be engaged in the first place.

I think there is just an ability to talk things out. I would say, absolutely, FEMA was the lead on things. But as I mentioned, to the extent that we could do some of the heavy lifting from a HUD perspective, such as with the environmental review, and they piggyback off of us was less work

that their environmental and historic preservation offices had to do. So there were -- there are ways to collaborate.

And I think in some of the mind frame, too, is they're really interested in total project, total project costs, really leave it up to FEMA grantees to figure out how to coordinate that match. But to the extent that we were vocal and visible with them up front that we wanted to use CDBG-DR funding, we needed to convey that to them. And I think they were responsive.

But we needed to create that culture of being able to work together. And for them to say, oh, what do you mean you're going to hold off on drawing down money from us for a little while? That's weird. Don't you want FEMA dollars out the door ASAP, for us to say, well, actually, we want to front load our 10 percent match instead of stretch it out over the life of the project. So let's work together to do things slightly differently.

There was a willingness to say, okay, but we had to identify the issues and identify that it was important to work together. I don't know, Amber, if you've got anything you want to add on that, given your role [inaudible].

Amber Lynn: Sure. Yeah. I think so. I think that covers quite a bit of it.

I will say that definitely the fact that the 428 pilot program was relatively new at the time contributed. I think it was easier to get folks in the room in terms of having these broad policy discussions, both with FEMA representatives and with HUD, to talk through some of that. And then, again, because Sandy -- because the magnitude of Sandy, I think FEMA was open to looking for those areas where we could try to ensure that we weren't duplicating effort.

And I think environmental review is a really good example. A lot of the FEMA staff who were responsible for doing EHP reviews were doing that for a number of grants across the city. So by having things that were able to stand up to HUD environmental review be provided alongside that, I think it just kind of allowed them to focus less on that or to kind of take that in as something that was already vetted.

And then, likewise, because it was a 428 project and we were able to kind of use that model of matching up to the cap, it was -- I think it was a little bit more of an open dialog about what was going to be eligible for match there.

So I won't say that it -- for Rockaway, I think it worked quite quickly. I won't say that all of the FEMA coordination is always expeditious. Sometimes it can get a little gummed up just in policy discussions there. But because it was a disaster with the magnitude of Sandy and because there was a lot of flexibility and a lot of innovation that was happening with the 428 projects at the time, at least in my experience, it seems like there was a little bit more flexibility there in terms of setting up these policy discussions and kind of working together with FEMA taking the lead, to some extent.

Scott Ledford: Great. Thanks.

"How did you balance HUD expenditure deadlines with the length of time it takes for FEMA projects to complete?"

Calvin Johnson: Great question. I think, as we were trying to do is 54 out of our 700-plus PWs we ultimately did match on, one, we developed policies and procedures to give us criteria as to what PWs we would pursue further. Some of it was consideration of benefits to low mod individuals or areas. Some of it was timing where you just know, okay. This is a project that will be playing out until the 2030s. Maybe not the one that is the best alignment for HUD funding. And size of project, as we mentioned.

But it's finding those Goldilocks projects is -- it's tricky, and I think some of it is also management of expectations. We didn't try to use CDBG-DR funding to cover the match for each and every project. We had the ability and the necessity to be flexible and sort of not looking just at project schedule overall but within the different phases of the project.

We sort of mentioned that with the Public Housing Authority example of paying for design work while construction continues later and you don't need to worry about compliance and eligibility on the entirety of the project, and you've brought down your HUD funding sooner, not later. And they're just candidates that might have been great projects but were just moving too slow to align for match purposes.

Olivia Healey: Thanks, Calvin. Looking at the clock here, I think what we'll do is we'll transition you to the closing here and go over the resources that we have for you.

And so you actually still have the presenter ball. So if you can move us to our resource slide, that would be really great. Thank you.

So I know that you guys had pooled together the CPD notice here from the HUD Exchange and then have also provided some of your own New York City resources. So thank you, guys, so much for doing that. Very much appreciate it.

And then we can pivot to Jen for a closing on our series and today's session.

Jennifer Carpenter: All right. Thanks, Olivia. Thank you to our colleagues at New York City OMB for doing that presentation. That was great.

I just wanted to come on and say a big thank you to all the grantees who participated in these sessions. I sat in on all of them. I thought they were all terrific. We got a ton of great insights, lots of best practices, some -- just a lot of real-world help for you guys on these topics. And I hope you all enjoyed them as much as I did.

One of the things I noticed throughout the nine sessions, almost in every session, was our grantees really encouraging you to reach out to them. Ask for help. Don't feel like you have to recreate the wheel when you're talking about putting together policies and procedures. There are grantees out there who have been doing this for a while, and they're there to help. And a lot of those materials are online.



I won't use Tommy's term of R&D, but I think it's perfectly acceptable to grab some policies and procedures and then make it your own; right? Go through it. Make sure -- if you're going to use those policies and procedures that another grantee put together, make sure you're adapting it to your agency, to your processes that you actually follow, and make sure you go through those and can own that at the end of the day as yours; right, because HUD will be looking at that and making sure you're following your own procedures.

But I think it's great advice to not start from scratch and really use the resources from your peers. And it's one of the reasons why we wanted to put on these sessions, to really start with these sessions, to recreate that networking that we know happened through the problem-solving clinic. And since we can't meet in person, we're just really glad that everyone was able to join us. So big thank you, and we really appreciate that.

And for those -- I know everyone asks. These are recorded. They will be posted on the HUD Exchange. Usually, we'll send a blast out to let you know they're posted. So if you missed any of the tidbits and the insights, you can always revisit them later. The recordings and the slides and everything will go up on the HUD Exchange. So just give some time for us to do that, and we will post them and let you know that they're up.

But thanks again from HUD. We really appreciate it. Thank you to all of our grantee volunteers and all those who were listening. Take care, everyone.

(END)