

CDBG-DR and CDBG-MIT Grantee-Led Sessions

**7: CDBG Grantee Public Communications Corner Addressing
Disaster Recovery Timelines**

Thursday, April 1, 2021

Scott Ledford: Great. Thanks, Paul. Oh, Ann, great to see your video pop up. I hope we get to keep that. So I'll go and do my video as well. We were having a little bit of video challenges this morning. So if folks see the video drop off, we apologize, and bandwidth is things we have no control over.

So -- well, welcome, everybody, to the third day of the CDBG-DR and MIT virtual learning where we get to hear directly from your peers and colleagues. I'm Scott Ledford. And Olivia Healey is still at my virtual side to help moderate these informative sessions.

You've asked some great questions during the sessions the last couple of days. And in some cases, we haven't been able to get to them all. But please do keep them coming through the Q&A box. We will have a record of them, and we'll work with your HUD hosts about any potential responses after the series.

Just in case this is the first session for anyone, here's a few quick logistical items to be sure we cover these.

First, each link is unique for each session. So please fully exit after each session, and then join the next one by using the link that was sent to you for that specific session.

Next, the speaker will cover their content through its conclusion. Then we'll start the Q&A portion. But we do encourage you to submit questions throughout the session using the Q&A box, and we'll keep them up and have them ready for Ann.

Speaking of questions, I know Ann has been putting some thoughtful ones into the Q&A box for previous sessions. So let's meet her and let you ask some of yours about her always relevant topic.

Ann is the disaster recovery team leader and historic preservation specialist for the Iowa Economic Development Authority. She primarily works to assist grant recipients with the expenditure of federal disaster assistance grants and in compliance with the National Historic Preservation Act, or NHPA.

Ann is an expert in Section 106 of the NHPA consultation process. She has a master of science and historic preservation degree from the School of the Art Institute of Chicago and a Bachelor of Arts degree from St. Olaf College. Ann has been practicing disaster recovery and historic preservation for over a decade. She has worked in Iowa since 2010, and prior to moving to Iowa, Ann worked in a variety of preservation related roles in Chicago. Ann, great to see you on video, and take it away.

Ann Schmid: All right. Great. I'm so glad the picture came back. And, first, I just wanted to thank HUD and ICF for this opportunity. It's been really exciting to hear from all of our disaster recovery peers and to be able to share some information. It's really -- it's always great. While we miss the in-person clinic, it's exciting that we're able to still do this virtually.

So getting started, I was asked to speak today about timelines, disaster recovery timeline. So it can be a pretty big topic. There are lots and lots of timelines associated with both the disaster events, recovery response, and certainly the management of CDBG-DR, which we are all here to commiserate on and discuss.

So my advice for timelines is to be at the table early and often. So many times disaster events occur, and we'll get into the logistics of sort of what the next steps are and how we manage that. But to prepare yourself and to be ready to take on the tremendous activity of establishing [technical difficulty] to recover [technical difficulty] manage response and recovery.

So particularly, somewhere in your state, in the same way that you have an office dedicated as the recipient of your HUD funds, there is an office in the state dedicated to the recipient of FEMA funds. And so you have a partner. Here in Iowa, it's the Iowa Homeland Security and Emergency Management Agency.

So you'll have an emergency management office, and it's very important to know that staff and to know who they are and the programs they work on. In our state our homeland security and emergency management team exercises their state recovery support functions.

So they may have a recovery support function for housing. And in that exercise, they may envision a disaster event that affects housing in a certain location. And they'll have all of the different partners from across the state come and exercise that support function so that you make sure that you know whose role and responsibility it is to participate in those efforts.

Now, my experience is that, more often than not, those exercises assume the delegation or obligation of disaster recovery funds that we never actually see just because of the size or scale of the disaster event that they've identified in the exercise. But it's still good practice to get to know those folks and to see who's involved at your state level, particularly because those are the partners that are going to be the first ones reaching out for a presidential declaration, should one occur, or particularly which FEMA programs need to be asked for.

I know one of the most frustrating things that we always hear in disaster recovery is, how am I supposed to know what to ask for? And I think communities are always frustrated that a disaster event occurs, and then the federal government sort of stands back and says, you have to tell us what you need.

And so in order to run an effective CDBG-DR program, it's always helpful to know who those folks are at your state level who are engaged in offering programs at the FEMA level and particularly helping the communities know what's available and what to ask for.

And then I last had, have a role in special task force. I know this varies from state to state, and some states with repetitive disaster events just sort of already have a disaster recovery effort stood up. But other states who either haven't had a disaster recently or maybe at all are often faced with sort of, what do we do right away?

And the tendency for elected officials is to take action of developing task forces or some other kind of committee or group that will be engaged in coordinating the government available resources as well as the needs of the impacted citizens. And so my advice there is that, if you even hear of rumblings of this happening, make sure that someone from your CDBG team, if you don't have a disaster recovery team, is engaged in those processes and is at the table.

So if you're on this call, you likely already know what happens when a disaster event occurs, but it goes with the overall timeline of sort of knowing when and how disaster recovery CDBG-DR funds will be available to you.

So it's important to stay up to date on the impact and damage. This will give you a really good sense of the thresholds that your disaster is getting to in terms of being a state-declared disaster, elevating to a presidentially-declared disaster, and then, again, as I said, those other government agencies that will be requesting additional supplemental funds.

In our state and I think most states across the board that use the FEMA emergency systems, they are going to have an emergency operations center, a CEOC. And at ours, we have certain dedicated positions for every agency or team that would be participating in that.

So having at least one person who's either sitting at the table or, as it may be with COVID or other remote situations, at least have access to a portal. Sometimes those portals do contain sensitive information, and you need prior approval. So being proactive and having that relationship with your state emergency management will help you be able to say, hey, if and when a disaster event occurs, we want this person or this email address to have access to those daily situational reports.

And, again, what that's going to tell you, in the very early days of a disaster event, you're just collecting information from [technical difficulty]. We're not [technical difficulty] sometimes. Typically, we're not the [technical difficulty] response [technical difficulty] people. We're gauging impact. We're gauging the level of effect to see the likelihood of this getting to a Congressional allocation for Community Development Block Grant Disaster Recovery funds.

So as disaster events occur and roll out, you've got your emergency operation center stood up, and then you will likely have joint agency meetings. And so this is where you're going to find out particularly what your state is asking for from FEMA and then what other state partners out there are providing resources.

So you always find that you're going to have some form of maybe individual counseling from your human services department or public health may be involved, depending on the type or scale of the emergency or what has been affected. And you're going to have -- maybe natural resources could be involved.

So you're going to want to just be sure that you are at the pulse. And a lot of times these -- figuring out who to talk to is either managed through that emergency management office, or the governor's office is going to start to coordinate the relevant state agencies that need to participate.

And it's important -- what I have found is that any time you're in those conversations, if people know that you have disaster recovery experience or maybe they remember a disaster 10 years ago where DR was allocated, it's very important to, from the beginning, manage those expectations about what DR may or may not be able to do and when DR may arrive.

And I think people are always surprised when I hear -- when I say, it'll be 18 months to two years before we'll have programs up and running, because CDBG-DR really is that long-term response. It's not immediate response, but -- I'm sorry -- long-term recovery. So it's those efforts that take place significantly after the disaster event occurs but, as you know, can have tremendous benefit to the communities in terms of setting them up for more resilient and sustainable redevelopment after a disaster event.

So really understanding and articulate [technical difficulty] long time but having [technical difficulty] and help the state understand where there may be immediate need deficits should be sought and then identifying CDBG-DR for more long-term recovery activities.

So have a pulse on the unmet need. So, again, this comes from knowing what programs are out there, what people have asked for, what is being deployed. Has FEMA provided temporary housing? Will the disaster event in the geographic area be cleared in the timeframe of temporary housing? All of the FEMA programs have pretty aggressive and short time frames.

And so you're looking for what are those ongoing needs, based on the limitations of current programs and current funding opportunity?

Go ahead and stop my video, if that'll improve the quality.

One thing that we experienced after our most recent state disaster is that we went ahead and conducted a disaster imp- -- a survey for disaster impact on survivors. And this was relatively low tech. So we were able to come up with a resource that was able to make a web-based tool that we just had to provide a link.

And we just asked simple questions about, were you a homeowner or a renter? Have you been able to return to your home? Do you want to return to your location? Just kind of gauging where people were in terms of how they felt about the disaster. So it was nothing terribly technical, and it didn't ask for any income verification or address or anything specific. It was just to gauge where people stood.

And that really helped us focus our programs in terms of sort of public input and where people were thinking. And we sent that out before we knew that we would have a HUD allocation. There had been a congressional act by that point. So we had a good idea. But it was still something that we kind of thought it was a low cost, low budget, low tech way.

And really, once we put the link together, we found that the best way to reach the disaster impacted victims was not necessarily through their municipality, although we made the link

available to the cities, but through the survivor Facebook pages that just happened to pop up. And most of those are private and controlled by those survivor folks.

But what we did is we found local contacts who we knew and who had been at the table in the early discussions, and they went ahead and posted those survey links out to their Facebook pages. And so we got a lot of responses that way. And it really did help us get a sense of what those remaining unmet needs were two, three, four, five months post-disaster that weren't being necessarily met by the programs that were currently being [technical difficulty].

So find the right fit for the funds. So at this point in the disaster, the events occurred. You're starting to gauge the impact. You're starting to gauge those unmet needs, and then you're really left with determining how to use the funds.

And I think what happens a lot is that, when states react to disasters or any municipality, there's always a impulse to use the fastest funds for the low hanging fruit. And we certainly want to get the money out the door as quickly as we can, or we want to use the resources we can for those imminent needs that affect impacted victims, health and safety and quality of life. But we also struggle with balancing those regulations.

So in our state, for example, after our most recent disaster declaration, the legislature appropriated some state funds, and our state funds have much lower regulatory compliance. And so I sat down with our homeland security team and kind of said, okay. What types of projects typically trigger high compliance costs? What things would trigger labor standards or complicated environmental reviews or be limited to low to mod income or any of those things? And then which projects do all of those things, they're going to trigger anyway, and we can fund them with CDBG?

And so I use the analogy of my children's little toy where they want to fit the peg in the hole but they want the shape to maybe not fit exactly. And I think this analogy worked really well when I spoke with legislatures and the governor's office to really say, let's take a minute. We're all in a rush. We understand the urgency, but we don't want to make -- we don't want to make choices that make spending our money down the line even harder.

So what I really tried to do is, knowing the limitations of the HUD program with LMI requirements and particularly with those mid area requirements, we didn't want to see all of those more flexible state funds spent in the areas or on the things that CDBG would be the right fit for.

So knowing what CDBG is eligible for is really important and then knowing how those programs are the right fit when other maybe more flexible funding could be used for some other project recovery efforts.

So, again, as you go through this process, it's very important to stay in touch with your state partners. And like I said, I use this analogy of fitting the right funds with the right needs when I talked to those partners and particularly the state leadership. So I think it's important, whether it's just through your own agency leadership or if you can get all the way up to the governor's office,

it's important for that leadership within your state to have buy in on how you propose to use CDBG.

I think as some of the prior presenters had indicated, CDBG can be political. There can be interest in certain programs or practices or projects that need to happen. And so being able to defend or justify why one funding source may be a better fit to a program than another is certainly important.

And what I did when I presented, I had the chance actually to present to our governor, and I was able to present in a forum where I said, in black text are the things that the regulations require we do with these funds and in red text are the things that we have more flexibility on. This is what I propose based on experience. But just know that that's where you have the opportunity to make some changes.

And so that really -- it empowered our leadership to say, okay. Well, I might want to change this or that where I can, but I also understand that there are restrictions and limitations with these funds.

This is a graphic that we had put together actually after our 2008 disaster recovery efforts when we were working on telling the story of disaster recovery. And I know the text is probably pretty hard to read, but it just shows kind of a very simplified 10-step process for disaster recovery, because I do think it's important to stress that, when the disaster event occurs and the state appeals to FEMA and the president makes a declaration, all of those things are going on kind of before there's even an understanding or an assumption of HUD Community Development Block Grant Disaster Recovery funds.

And it really is that act of Congress when a disaster relief bill is signed into law that starts the ball rolling on the state knowing that there is a chance for supplemental funds.

Now, again, as I said earlier, the act of Congress is important and necessary and will generally let you know that that disaster event will be receiving supplement. But many times those disaster events carry over multiple states.

So for our example, we knew that our flooding had significantly affected Nebraska and Iowa. And so, when the legislation that went through said, Midwest floods of 2019, it wasn't totally clear if the states would be getting equal CDBG-DR or any CDBG-DR just because Congress does try to keep those laws pretty broad in terms of eligible disasters within a certain timeframe or year.

And so just figuring out how to sort of plan for a response without over-obligating your state before you know that there are resources. And then certainly it takes a substantial amount of time to get through the next couple of steps in terms of designing, knowing how many -- how much funding you'll be receiving as a state, generating those plans, the action plans, the financial certifications, making sure that that gets HUD approval, and then ultimately rolling out your programs with the understanding of OIG and OMB oversight on programs. So just a visual graphic of the path of disaster recovery.

So I've talked a little bit about my recent experience with our 2019 event, and so I thought it might be helpful for anyone who is new to this or who's going through the process at the same time. We got a little lucky, and lucky is the wrong word to use when you're talking about disaster recovery, but I'll explain it here that our spring flooding in March of 2019 occurred.

And it just so happened that Congress had intentionally chosen to delay action on the 2018 disaster events until the end of that calendar year. And they were in the process of writing that disaster recovery bill when our flooding event occurred.

So I'll tell you the and Midwest floods of 2019 kind of got thrown in. There were also a few tornadoes that spring that got added as well. But we had the benefit, if that's the right word, of getting tagged onto an existing legislation that was already in process. And so if you see that our event occurred in March of '19 and the recovery law was passed in June of '19, that is a very quick timeline. I do not think that that is something that is standard or common.

There were disaster events in that same appropriation that had occurred a year or even 13, 14 months prior to that law getting signed. So they were waiting that even longer period of time than we were.

It then took HUD until January of 2020 to provide their allocation. I think there was some information provided in December, but the Federal Register notice with the allocations came out in January. And that Federal Register notice, as some other presenters have said this week, is really where you start. It is what guides your efforts.

So the very first thing that you do once you know that your state is going to be receiving an allocation is you read with a fine-tooth comb that a Federal Register notice and all the related Federal Register notices. And I will say I really appreciate the work that HUD does on the HUD Exchange to group those relevant Federal Register notices by law or by disaster event, because it does help you figure out exactly where to be looking.

But in that Federal Register notice, it had given a 60-day timeframe for the completion of your financial controls and implementation plan and capacity plan -- capacity assessments. Excuse me. And then 120 from notice for your action plan. And so the financial certifications would have been in March, and the action plan in May.

Now, of course, that notice came out pre-pandemic. So all of those got slightly shifted. But we as a state really tried to meet those original deadlines. So I believe we submitted our certifications in April of 2020 and our action plan in June, so just one month delayed.

HUD has a timeline for their review of the action plan. It's actually written in the Federal Register notice. So we received comment and feedback in July, and we received approval in August. We then received -- there is not a mandated timeframe for the financial certifications review. So that took just a slightly bit longer. We received approval for that in November, and then we received our grant agreement in December.

So I just wanted to kind of provide just the general sort of months that it takes to do this. So disaster event was in March, and it was a good 20 months later that we had a grant agreement. So it does take time. And again, we were lucky to be mildly expedited with the congressional action happening more quickly than typical.

I think one thing, as we manage disaster recovery grants, is that we spend a lot of time on that window, those 120 days to get your action plan, the 60 days for your certifications and capacity plan, which is overwhelming. And we'll talk a little bit about staffing, I'm sure.

And so we're spinning our wheels all the time just trying to get through the hoops to get our grant agreement in place. And then once we do, there's all that pressure because you're -- you've been able to say up until then, well, I don't have a grant agreement. So I can't really engage in programs.

And then as soon as you do, you realize that you have to do all of those other infrastructure, technical infrastructure components of building applications, building review and approval processes, building contracts and grants components. And some of that we had contract language in our -- as part of our certification. So you -- HUD does a good job in that financial certifications of making sure that you've thought through your process and that you are in a good position to start.

But there are still all these little details of make it -- getting it up and running, making awards, managing awards. Certainly, the quarterly reporting to HUD requirements of QPR, making sure that you have your strong monitoring process in place, and then, ultimately, closing activities and then closing the grant with HUD.

So as I looked at disaster recovery timelines, I knew that there's just the timeline of what happens right after the disaster, what happens during the window of Federal Register notice and grant agreement, and then what happens during the life of your grant.

So I would say for me, the primary highlights for understanding and managing those timelines are to participate early, like I said. Be at the table. As painful as it is to think about doing those exercises, it really does help you know what else is out there, what other programs are, what people are doing, and who to call when you have questions about those other programs.

Knowing those available resources and then fitting the right programs with the right needs, those are the three things that I would take away from learning how to set up and manage a disaster recovery operation.

So I feel like I went through that kind of quickly, but, Scott, if you want to kick off the questions, maybe I'll try video again and see if that is possible.

Scott Ledford: Sure. Happy to do it. And while you're trying that, we'll stay off video until -- oh, yours is back.

Ann Schmid: Hey. You never know.

Scott Ledford: That's true. Yeah. The Wi-Fi is a wonderful thing sometimes and not.

Anyway, so to jump to our first question, "How do you address the timeliness of recovery for the homeowner when the procurement process adds a minimum six months to the timeline of returning them to their home?"

Ann Schmid: Yeah. Managing expectations is one of the most challenging components of disaster recovery. I think, with CDBG-DR, because we know that we won't have our funding for quite a while and, frankly, we don't know our allocation for a while, there is a window between when you have your allocation and when you get your grant agreement that you can start thinking about sort of pre-award [technical difficulty] focus those immediate [technical difficulty] back in their home or [technical difficulty] FEMA was available for rehab, if there are other [technical difficulty] available.

I think if people are really displaced and have immediate needs, than your state -- you need to articulate those needs to the state to find other sources. And I hate to say CDBG-DR is not the best fit for rehab because I know in some circumstances it works really well. But it is very challenging in that delayed response.

I think there are other better funding opportunities, again, finding the right fit for the right funds. I think if you're looking to get folks back into a residence -- into their own home, there might be a better other funding source for that.

Scott Ledford: Great. Thanks. And, Ann, just so you know, your video is still -- your audio is coming in and out just a little bit. So maybe we'll just go off video so we can just have a consistent voice.

Ann Schmid: Okay. Sorry about that.

Olivia Healey: No worries at all. So I have a follow -- well, not a follow-up question. Additional question. "Do you have any pointers on how to effectively and strategically acquire or gain the relevant data needed in the development of an action plans need assessment, especially if personally identifiable information might be shared or provided?"

Ann Schmid: Sure. So we kept our action plan somewhat general, so in terms of not collecting PII for the data that we were using to talk about our needs.

So, like I said, the survey that we conducted post-disaster but even before our Federal Register notice or our allocation, that was fully anonymous, but it collected enough information about each responder to give us a sense of sort of -- we were able to analyze that data and a sense of how many -- what did homeowners say to these series of questions? What did renters say to these series of questions? And so that was anonymous data that we were able to create some graphs and charts and use.

And then a large component of the action plan was just on sort of known demographic data about those communities anyway. One thing about knowing your state partners is that we were lucky to work closely with our housing authority, which I think most Community Development Block Grant recipients are either in the same agency or are familiar with the agency that does their housing authority. But ours utilized some really great demographic reporting tools, so census analysis in terms of reporting income and education levels and all of the sort of factors for looking at the vulnerable population.

And so we -- when we sent out our survey that we kept fully anonymous and then when we looked at the demographic data of our mid with those sort of robust census tools that our Iowa Finance Authority had, we were able to make some analysis based on the comparison of those.

And then additionally, the FEMA reports on number of major and destroyed households. So FEMA collects that information and, again, they're collecting it and sharing it as an aggregate.

So we're not -- and at least for us in our action plan development, we did not get into PII concerns because we were looking at everything from either anonymous or aggregated data. There are PII concerns, I think, when you get into creating tools for duplication of benefits. And we've just worked closely with our homeland security folks where they keep that information and just share with us on sort of a case-by-case basis what we need for confirmation of our duplication. But we avoided any kind of PII concerns in our action plan development. I hope that addressed the question.

Scott Ledford: Great. Thanks. So this is a question from the Q&A box. It says, "I really appreciate your comments about framing the requirements and opportunities to upper-level state leadership. Can you speak a little bit about how to talk about those same points to community leaders and survivors?"

Ann Schmid: Yeah. That's a really great question. I think the best thing I can say, and it kind of goes both to speaking with state leaders as well as survivors, is just trying to be as genuine and honest as possible.

And I think we all know with Community Development Block Grants, it is bureaucratic and there is red tape. And I think that when I talk to communities, I often say, you are part of this most impacted and distressed, and it is going to be challenging. But the things we can do with these funds are transformative in the long term.

And so not looking at quick fixes or just repair to pre-disaster condition, but trying to use these funds in a way that helps people re-envision what their community may look like in a post-disaster event.

For us in particular, our most recent disasters have been flood impact and flood -- pretty substantial flood, I mean, where we had eight to nine feet that stayed high for six weeks or more. So when you get that level of impact, it change -- it's going to change the community no matter what. And we're certainly seeing that with buyouts and land restrictions.

And so taking CDBG and thinking about, we -- because of the impact of our flood and the -- how the floods were centrally located in somewhat known flood risk areas, we were able to kind of say, let's not do rehab on those properties, but let's look at what other resources we can do in terms of building more resilient homes in safer areas. And so you really do -- it is a hard conversation to have, but you have to start it with, let's start planning how your community will be different but different in a good way.

And we utilized some additional planning resources. We didn't wait for CDBG planning funds. We found some other planning funds so that we could start having those planning conversations with the community early on so that people weren't just sitting there thinking, I'm watching all of these buyout houses get destroyed and I don't know what my town's going to look like.

So we're trying to give them a little bit of hope in the conversation of what will my community look like in -- when we're done with all of this, while they're still trying to deal with the loss of what they knew. It's not easy, but I think being open and honest and just trying to manage expectations -- and even if you just tell people, I am trying to manage your expectations, it goes a long way. I know that sounds like a silly answer, but it really does.

Olivia Healey: You kind of just touched on this a little bit when you mentioned the fact that you used additional admin funding, but we have a question that came in. "Can you discuss what Iowa did prior to receiving the grant agreement, after submitting the action plan and certifications to prep in order to get up and running, once the grant agreement was signed?" And then the additional nuance to this question, "Is there anything that you wish that you would have done differently?"

Ann Schmid: Yeah. So we didn't start looking for -- and I think I mentioned in the presentation we'd be talking about staffing because I figured it would come up in questions.

We didn't start adding staff until we had our allocation, which I think is the right move because you just don't know how much you're going to get or what your staffing needs are going to be. But I think that the one thing that's challenging is just the length of time it takes to onboard new disaster recovery folks.

I really loved -- was it Tommy yesterday who said, when you go out to hire these things, you really want someone with CDBG-DR experience. But they -- you just -- they're not out there because they're all working. And the same with CDBG experience.

And so we were able to find some really bright people to come on board. But as you all know, that learning the knowledge and the language of the Community Development Block Grant program, it takes time. And it's not the -- it's been hard with the pandemic. It just hasn't been the easiest thing to onboard staff and be able to get up and running as quickly as we had hoped.

But I will say we started that process. We got our allocation in January, and we started the advertising for those positions in May. And we didn't have our new staff on -- fully on board until probably October. And so I would just say maybe thinking more about staffing earlier so that you kind of have -- we didn't really do that.

We sort of reacted to the HUD allocation, and I would almost sort of say, if we get \$50 million, this is how many staff people we think we need and when we should start hiring. And if we get \$100 million, this is how many we need. And I think that kind of preplanning on just staffing capacity would help keep things moving on.

And then I think there was also a question of sort of what did we do to get our programs up and running once we got the grant agreement?

And to be honest, we kind of tag teamed that. We had really great interaction with our HUD reps. We knew where our certifications were in the process. We knew where the grant agreement was. They kind of told us where we were in the queue and when things were getting reviewed.

So we had some confidence to go ahead and start opening our programs even before we had the signature wet seal grant agreement because we knew we wouldn't be making any awards or obligations until after that was executed. But we did have the chance to kind of concurrently -- we didn't wait while we built what those program policies were, the guidelines, the application. So we did try to run it in -- as much as we could by streamlining.

Scott Ledford: Great. Thanks, Ann. So you kind of answered this question in your last response. When there -- when a disaster hits, there's not a standing disaster recovery agency. You talked a bit about when you might start looking at hiring additional staff. A little angle on that is, what kind of support would you be looking for first?

Ann Schmid: Yeah. That's good. We looked for -- we looked for sort of project manager support first, so people who could help us write program guidelines and educate on programs. That was our approach. I think it worked great.

I will say a couple of the things that surprised me along the way is sort of the need and lack of available legal resources. We do have a legal team within our agency. But it just so happened that right when we got our grants kind of up and running, our legislative session was in place. And so just kind of not having -- not thinking ahead of time or far enough ahead of time to have legal review of some of the things you might want, like contracts, agreements, some legal review of processes.

So that's something that maybe having a dedicated person to your program when you're getting it stood up would help.

We had a really great -- we have a really great sort of technical team that builds our annual program CDBG database management. And so we were able to just integrate that into our disaster recovery program. I think if we hadn't had a robust technology already in place, that would be probably one of the most important things to look into right away.

Olivia Healey: Great. "Do you know if there's anything you can do with the information you learned from FEMA, state, and local response agencies and from outreach and survivor surveys to demonstrate unmet need to HUD when they're making their allocations?"

Ann Schmid: That's -- yeah. It's an interesting question. So we have not been in the position to advocate or -- I don't want to use the word lobby -- HUD on sort of the value or the amount of allocation.

I will say that the one and only time that we kind of we're like, hey, what's going on, was at the 2019 DR clinic when we were able to sort of say to staff, do you think you're going to have the notice out soon? Are we in the notice? So just kind of like really casual, informal, just -- and it was funny because the staff is like, we're working on it, and, yeah. Yeah. Yeah. You're in the notice.

So I think we've never been in a position to -- I probably shouldn't say that while the staff team is on, but I think they try to -- they really do. They're your partners, and they try to help you through the process as best they can in terms of their role.

And I will say I don't know that it's necessary because they're going to base their award on the FEMA data. And so I guess my real advice, instead of going to HUD, would be to talk to your homeland security folks about, have all of the impacted communities applied for FEMA? Is everybody trying to get individual assistance? Have all the public assistance applications have been put in?

Because I will say what I've found -- what I've heard is that we had disaster affected communities that just didn't feel like applying to FEMA was worth their time or that maybe they just didn't know that it was worth their time. And so sometimes there would be things that were eligible for FEMA public assistance that they just hadn't asked FEMA for. And so those asks that go unprocessed further reduce the amount that HUD is going to see as a remaining unmet need.

So in some extent, I don't know that lobbying or advocating to HUD for more resources, if you know that damage is greater than what they're hearing it is the right tool, but really going back to your emergency management partners at the state and saying, what can we do to get these communities to get on track and to get in the system and to beef up those FEMA numbers, because that's what HUD's going to use.

They're not going to -- they're not going to come back and say, oh, well you say there was \$20 million more damage than FEMA did. I don't think they will. I guess I've never asked.

Scott Ledford: Jen, did you want to add anything in here?

Jennifer Carpenter: I did. Thanks. This is Jen Carpenter from HUD. I just thought I'd jump in because I do think there is sort of a nuance to this that I would encourage folks to think about.

I mean, Ann's right. There's no real way to contact HUD about the formula; right? The formula is published in the notices once you get the allocation. But, generally, in our Federal Register notice, we do allow grantees to come in with their own data to show that there may be additional most impacted and distressed areas to add to their grant.

So if you check out your Federal Register notice, you'll see a section in there that does allow that, if you have data, additional data that HUD didn't have, and you can show that these areas are most impacted and distressed from the disaster. That is something you could come in to HUD and request that those -- with the data and the justification, requests that those areas are added.

Ann Schmid: And we did that successfully, Jen. I appreciate your comments. We came back in at our governor's office request and provided data on major and destroyed residential properties per capita, and we were able to get a third county added to our mid. So the process is there, and HUD works with you. But like Jen said, the formula is what it is.

Scott Ledford: Great. Thanks, Jen and Ann.

The next question, it's a little bit lengthy, but bear with me for a second. "If you don't know if you're going to get CDBG-DR funds but you know CDBG-DR would add additional compliance requirements to projects that are partially funded by FEMA, state, or local funds, would you build in the CDBG-DR requirements, even though they had costs, for example, Davis Bacon Environmental Review Section 3?"

Ann Schmid: So it depends, and it depends on the size and scale of the project.

I think for the most part, if and when those more costly compliance requirements are going to be added to a project, I would probably wait and have full and complete confidence that CDBG is the best and highest use for those funds.

Again, like I said, I think some of that discussion of right fit right funds is the -- are those compliance and costly compliance components. And we talk a lot about the FEMA damage assessments and the unmet need of the 25 percent match as part of HUD's formula. But the reality is that FEMA projects -- generally, my knowledge is that they are exempt from those Davis Bacon labor standards and \$1 of CDBG in federalizes all of it for labor standards on all of it, is how we've worked through projects.

And I just know that communities often find that, with their contractors or with their ability, that maybe that's not the right fit and maybe finding other funds that won't trigger those compliance and then putting the CDBG to something where the compliance is maybe a more standard or typical fare, you're finding those contractors who are more used to those federal requirements.

And so I hate to -- I hate to provide a non-answer, but it's really a case-by-case basis. If you're going to have to do a big environmental review anyway because of FEMA and CDBG's not going to change that, then sure. Making sure you've got all your ducks in a row for CDBG ahead of time is great.

But if it's going to start to cost more -- I mean, Davis Bacon is one that I really do think I wouldn't proactively federalize a project for labor standards with the thought that we might use CDBG down the line. I would probably find a different source and use CDBG for something different, if you have that ability.

Olivia Healey: So earlier during our Q&A, we asked you a question relating to how do you acquire or gain relative data. And we had a follow up question that came in while you were answering that question. And it is, "Do you have any agreements in place ahead of your disaster season?"

Ann Schmid: That's good. We do not, and particularly because I think -- well, I'm going to correct my statement.

We do not have specific data sharing agreements in place prior because we never know exactly what data we will need based on the scope and scale of the disaster event. But we have had other agreements in place.

For example, we have a pretty robust programmatic agreement with our state Historic Preservation Office that carries over our annual CDBG program and/or disaster recovery program, should we be allocated funds in the future. So that's been really helpful to already have that in place.

I think if you think about sort of how you process annual CDBG, if there are agreements with other state partners that you can utilize, if you can be sure to include, this process also applies to future disaster funds, should we get them, that's just a way -- a good way to streamline things and keep things moving along without delay.

But when it comes to data sharing, we generally -- we have -- again, we don't have executed agreements in place, but we have really strong working relationships with the partners that we know we will need data from.

Scott Ledford: Great. Maintaining those relationships, even when they're not necessarily needed.

Ann Schmid: Yes.

Scott Ledford: So another question. "When you're doing an early survey, have you been able to also get feedback from impacted residents who may not be as connected to the internet, Facebook, things like that?"

Ann Schmid: Yeah. So we -- what we did in those cases are -- like I said, the survey was technology and link based, but we had -- we had a committee that was state staff as well as representatives of the flood impacted victim community. And so we worked with those representatives.

They're the ones who sort of had the Facebook link and could get us into those survivor groups. But we also gave them -- because, again, the survey was anonymous, we gave them printed copies that they could hand out and then collect anonymously. And then we could just have someone enter the data into the survey because it wasn't based on any identity.

But -- so we were able to sort of create a tool that could be both distributed and collected locally and inputted through technology. I will say we didn't -- surprisingly, the majority of respondents

came from Facebook cell phone use, but we did make paper collection available. And we really coordinated through our -- the emergency centers that were set up by our volunteer AmeriCorps partners collected those responses for us.

Scott Ledford: Gotcha. Great. Well, we just have a couple minutes left. I'm going to do one question for you that I'm calling the inside the grantee's office, homage to the inside the actor's studio. You may be familiar with that.

So staying within the context of disaster recovery mitigation, "If you had one opportunity for a do-over, what might be different?"

Ann Schmid: That's a really good question. One opportunity for a do over. Oh, man. I should have been more ready.

I think that when we started the program, we've been running it very much -- it mirrors the way that we run our CDBG program. So we have local grant recipients who are familiar with the program.

And one concept that we had kind of early on that we didn't feel like we had time to do, we sort of came up with this idea. We all thought it was great. And then when we went to go execute it, it just didn't really pan out as well as we'd hoped.

But I think what I'd like to have done better in the future is empower -- I know this is really tricky -- empower the local municipalities to be more at the table in terms of the programs that we're offering. So really being able to teach and train them on what we can do with our funds so that they can then get out and sell it locally.

Now, it's hard because they don't have the capacity in a immediate disaster response, and they don't want to take on those additional responsibilities. But we really felt like, if we could get the county or the cities to be sort of more of the administrator than maybe they currently are, that we'd get better feedback from the local levels.

And so I think that's something that I still like the idea of. It just might have to take some tweaking and figuring it out. But I guess in long answer to the question, maybe just finding better ways to connect locally is something that I still feel like we miss when we're operating out of our capital city and not down with the victims every day.

Olivia Healey: I think that was an incredible answer. None of us are prepared for Scott and I's talk show that we've developed here.

Ann Schmid: Right. That's great.

Olivia Healey: So you did an incredible job.

I think with the amount of time that we have left, we can just transition to your resources and move through a conclusion here for today's session.

Ann Schmid: Great.

Olivia Healey: So I know that you provided your website. So everyone can access that and be able to look into more of the documents and sources that Ann talked about during today's session.

And then, as always, we have our CDBG-DR and MID pages that are on the HUD Exchange.

And, Ann, thank you so much for your time today. We really appreciate it and the information and insight that you provided. It's very beneficial and helpful.

Ann Schmid: Great. Well, thank you so much for having me. I'm really sorry that the bandwidth technology wasn't better, but I really hope that we're able to see everybody's faces at a disaster recovery clinic next year. Thanks for all your effort.

Olivia Healey: And then everyone can log off, and we hope to see you at our next session. Thanks again.

(END)