

Effective Regional Coordination and Engagement Approaches

2020 CDBG-DR and CDBG-MIT Webinar Series

Webinar Instructions

- PowerPoint and webinar recording will be available on the HUD Exchange
- Participants in 'listen only' mode
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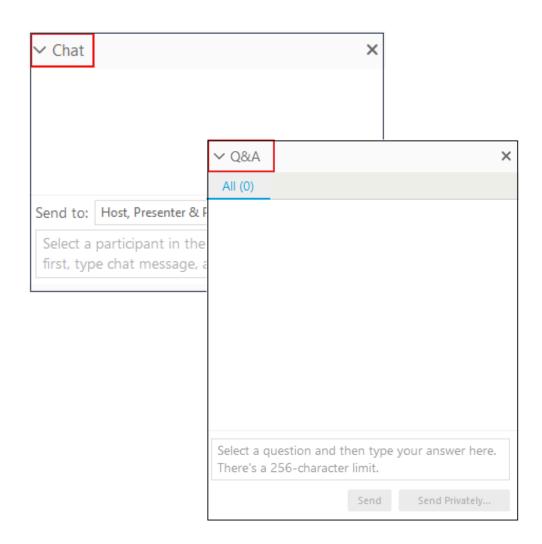
Technical Issues? Questions?

Chat

- Please submit any technical issues via the Chat box
- Send the message to the Host
- Host will work directly with you to resolve those issues

Q&A

- Please submit any content related questions via the Q&A box
- Send to Host, Presenter and Panelists





Effective Regional Coordination and Engagement Approaches

2020 CDBG-DR and CDBG-MIT Webinar Series

Introductions

- Wareesha Tariq, HUD
- Lauren Nichols, ICF
- Ann Schmid, Iowa Economic Development Authority
- Evelyn Campo, Louisiana Office of Community Development

Agenda

- CDBG-DR and CDBG-MIT Mitigation Overview
- Coordination Requirement
- Case Studies
 - State of Iowa
 - State of Louisiana
- Q&A
- Resources





CDBG-DR and CDBG-MIT Overview and Coordination Requirements

Lauren Nichols, ICF





HUD's Coordination Goals with CDBG-DR

Action Plan requirements:

Internal and Interagency Coordination

- Describe how the grantee will ensure effective communication between:
 - Different departments and divisions within the grantee's organizational structure that are involved in CDBG-DR-funded recovery efforts
 - Its lead agency and subrecipients responsible for implementing
 - With other local and regional planning efforts to ensure consistency

HUD's Coordination Goals with CDBG-DR (continued)

Action Plan requirements:

Planning and Coordination

- Promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially construction standards and land-use decisions
- Coordinate with other local and regional planning efforts to ensure consistency
- Based on the history of FEMA flood mitigation efforts and take into account projections

HUD's Coordination Goals with CDBG-DR (continued)

Action Plan requirements:

Consultation

- Disaster affected local governments, Indian tribes, local public housing authorities, federal partners, nongovernmental organizations, the private sector and other stakeholders and affected parties...to ensure consistency of the action plan with applicable regional redevelopment plans
- Encouraged to create a representative, multi-sector task force

HUD's Coordination Goals with CDBG-DR (continued)

Recovery Program Coordination

- Coordinate with HUD-certified housing counseling organizations
- Indian tribes with jurisdiction over the tribal area when providing CDBG-DR assistance to beneficiaries in tribal areas
- Environmental and historic preservation reviews to expedite planning and decision making for projects (Unified Federal Review)

CDBG Mitigation

HUD defines mitigation as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters

HUD's Coordination and Engagement Goals with CDBG-MIT

Coordination across:

- Agencies responsible for recovery, long term resilience and/or mitigation efforts
- Multiple jurisdictions
- Private/public partnerships
- Local, state and federal agencies responsible for administering other federal mitigation funds (e.g. USACE, FEMA, etc.)



HUD's Coordination and Engagement Goals with CDBG-MIT (continued)

- Maximize the impact of funds by ensuring effective communication and coordination between all these entities and encouraging leverage, private/public partnerships, and coordination with other federal dollars.
 - HUD emphasizes the critical importance of coordinating investments across multiple jurisdictions
 - Grantees must ensure effective communication and coordination between State and local departments and divisions involved in the design or implementation of mitigation planning and projects
 - Grantees must describe how they have partnered with and will continue to coordinate with other partners who manage FEMA and USACE funds and aligned CDBG-MIT activities with other federal, state and local mitigation projects and planning processes

HUD's Coordination and Engagement Goals with CDBG-MIT (continued)

- Enhanced Planning and Engagement:
 - Enhanced State Hazard Mitigation Plan
 - Citizen Advisory Committee
 - Promote community-level and regional planning for current and future disaster recovery efforts and mitigation investments
 - Modernizing building codes, regional land-use plans and upgrading mapping, data and other capabilities to better understandevolving risks
- Grantees must demonstrate the ability to operate mitigation projects for the useful life of the project



State of Iowa

Ann Schmid, Iowa Economic Development Authority





Iowa – A History of Flooding

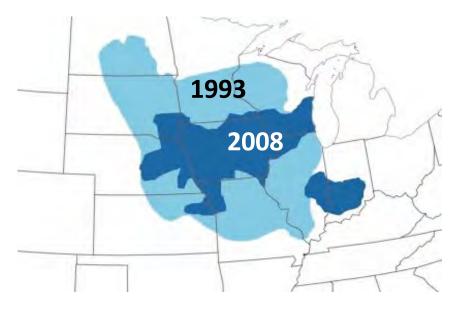
• 1993

- \$38.7 million CDBG-DR to State
- o \$15.8 million direct to 8 Entitlement Cities
- "The primary object for the use of HUD flood funds was to repair, restore and replace facilities damaged by the floods of 1993" – After Action Report

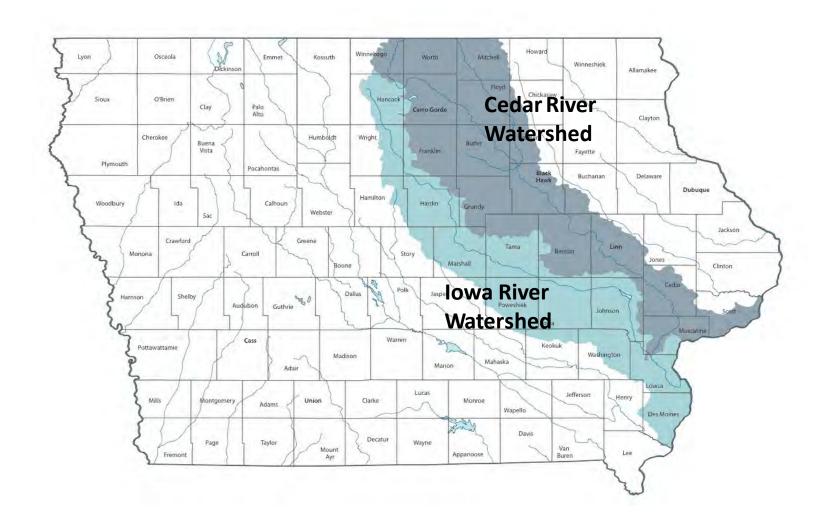
• 2008

- \$890.8 million
- Focus on Buy-outs, Infrastructure Improvements and Housing





Cedar and Iowa River watersheds were hit hardest



THE DAMAGE

60% of the flood damage was in Cedar Rapids



Two small towns were completely submerged



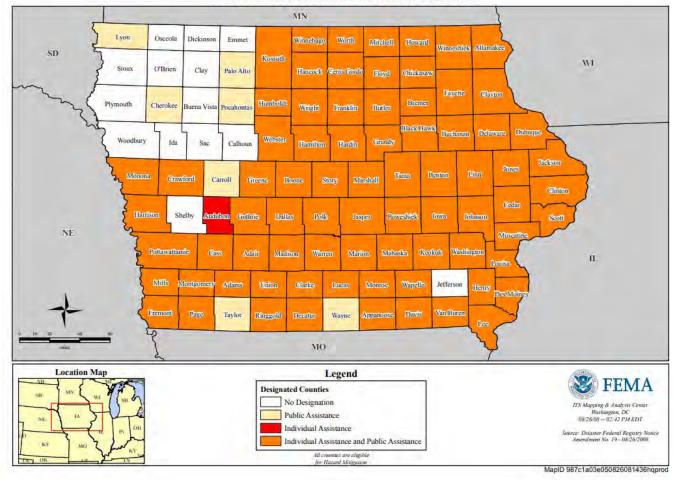


Oakville Palo

2020 CDBG-DR and CDBG-MIT WebinarSeries

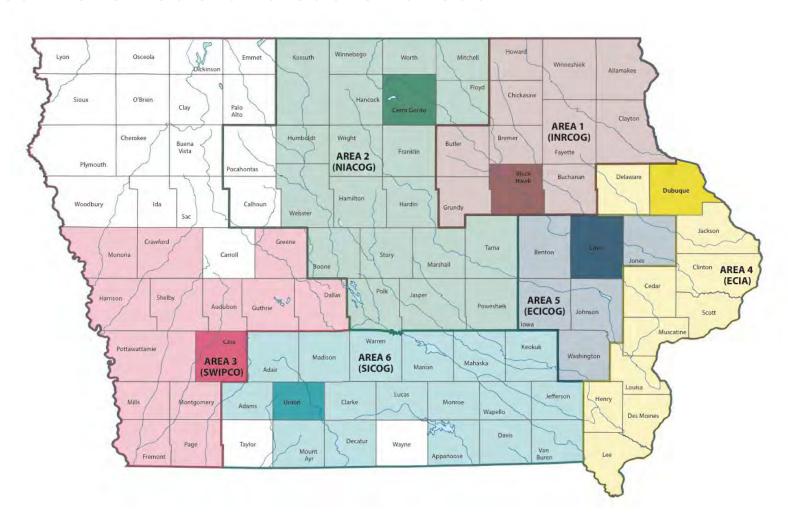
THE GREATEST DISASTER IN IOWA'S HISTORY: 85 of 99 Iowa counties were Federal disaster areas

FEMA-1763-DR, Iowa Disaster Declaration as of 08/26/2008



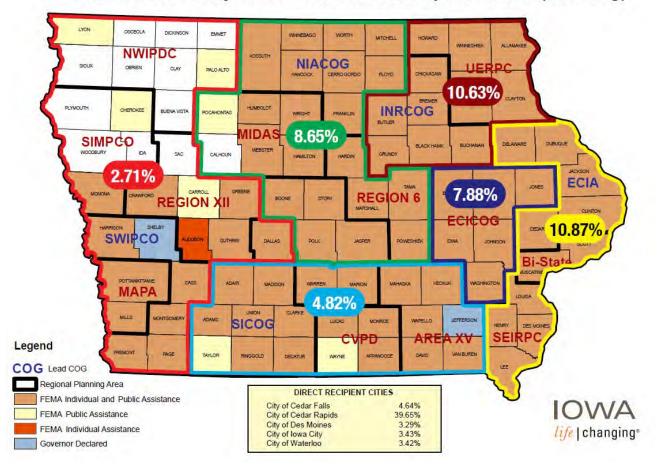
THE GREATEST DISASTER IN IOWA'S HISTORY: 85 of 99 Iowa counties were Federal disaster areas

- Regional Coordination
 - For Housing Programs Only
 - Identify the County in the region with the greatest capacity.
 - Identify the Council of Government (COG) for that county.
 - Make awards through a Super-County / Super COG for the region.



THE GREATEST DISASTER IN IOWA'S HISTORY: 85 of 99 Iowa counties were Federal disaster areas

Disaster Recovery Areas and Direct Recipient Cities (Housing)



Pros and Cons

PROS

- Reduced Administration
 Burden fewer contracts, single point of contact for the region.
- Consistency with only 6 Super COGs, the DR Housing programs were administered consistently throughout the state.
- Timing programs were implemented faster by just amending existing contracts to add more resources to existing programs.

CONS

- Turn over of elected officials initially, post-disaster all parties were supportive of this approach, but as the contracts continued, new elected officials had to continue a regional approach approved by their predecessors.
- Confusing This regional approach had to be repeatedly explained to citizens, local and State officials, media, etc. as it was not a previously established system.
- Challenging for the local entity as the Super County was the official RE, the local entity where the project was taking place had to find their role in the process.

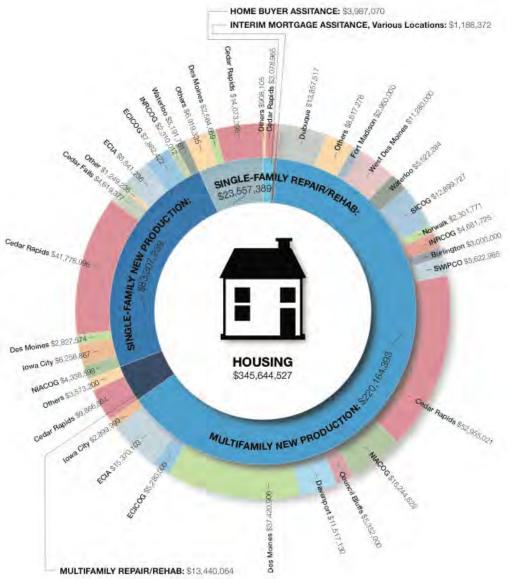
Housing Programs

- New housing production included both rental and owner occupied
- Repair & rehabilitation helped owners fix damaged homes
- Rental rehabilitation helped landlords fixed damaged rental units
- Homebuyer assistance helped owners afford replacement housing
- Interim mortgage assistance helped owners of bought-out homes pay the mortgage on their home until the buyout



THE RECOVERY

Where the housing money went



- 88% of housing money went to new production, mostly multifamily
- Most of the rest funded repair and rehab
- Homebuyer assistance and interim mortgage assistance each had less than 1%

26

Cedar Rapids got 34% of housing program funding

2020 CDBG-DR and CDBG-MIT WebinarSeries

THE RESULT: sustainable, affordable housing









But recovery alone is not sufficient

- National flood damages nearly doubled between 1995 and 2004
- Population in Iowa flooded areas up 18% between 1993 and 2008
- Development is increasing the flood threat
- \$1 in flood mitigation spending yields \$3–5 in avoided future flood damages

Dams and levees are not enough

These "grey" or "hard" defenses aren't keeping pace with the threat

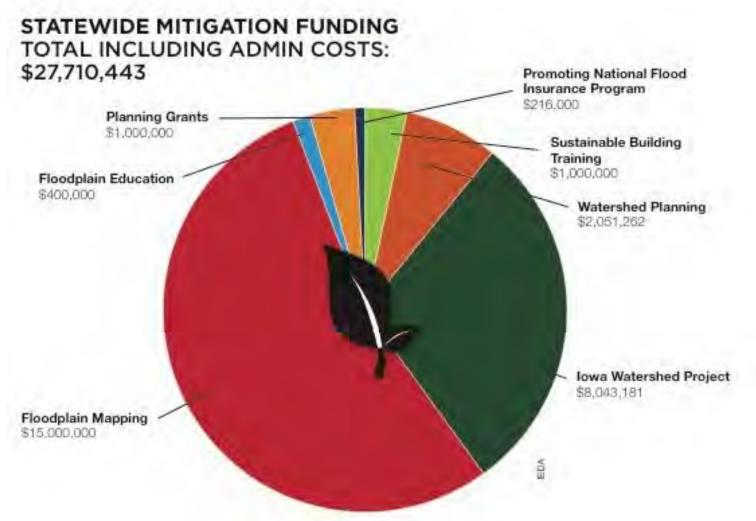
- Have design limitations they can only hold back so much water
- Create "flood-control arms race" what protects one community may put another at greater risk
- May encourage risky development— because the perception of protection can be greater than the reality
- Treat the symptom (flooding) rather than the cause (increasing runoff) once a raindrop becomes a torrent, it is very difficult to stop

So CDBG funded these mitigation activities

- Floodplain mapping for land use & hazard planning, flood insurance
- Floodplain education for better land use decision-making
- Planning grants to reduce development and risk in flood-prone areas
- Flood insurance promotion to reduce future uninsured flood losses
- Sustainable building training to encourage resilient new construction
- Watershed Planning to rehab lowa's flood management systems
- **lowa Watershed Project** to install 150 small-scale green flood mitigation projects in three lowa watersheds

THE LEGACY OF RESILIENCE

Where the pure mitigation money went



Nearly \$28 million in CDBG funding was spent on mitigation activities: those designed solely to reduce the impact of future flooding.

- 54% to floodplain mapping
- 29% to Iowa Watershed Project
- 7% to watershed planning
- 10% to other activities

THE LEGACY OF RESILIENCE

THE RESULTS



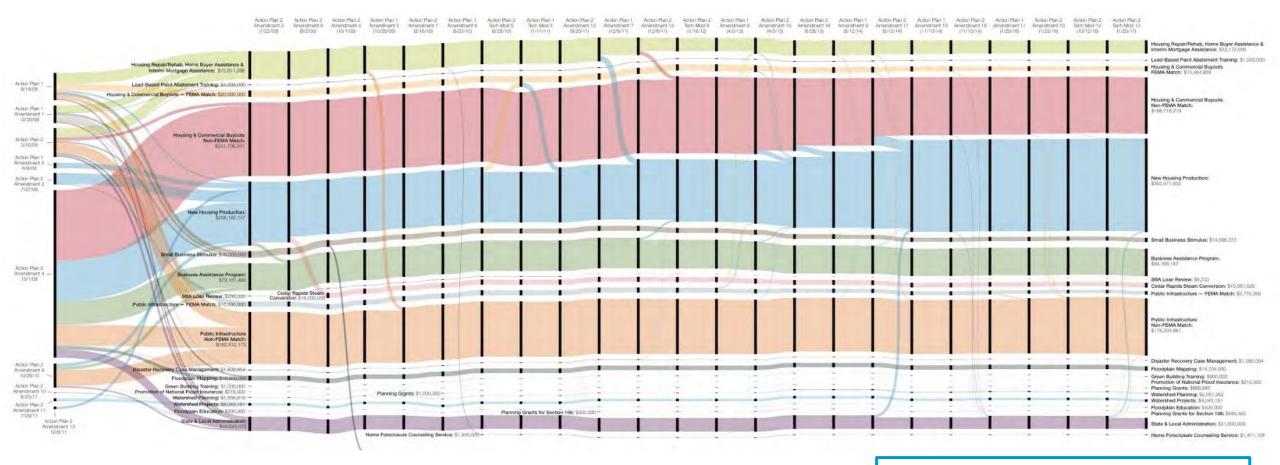






THE LEGACY OF RESILIENCE

Where ALL the CDBG funding went



TOTAL SPENT: \$890,869,466

CDBG funding has helped lowa

- Recover from disaster with no permanent job or economic losses
- **Permanently remove** thousands of structures from flood-prone areas
- Dramatically improve its housing and infrastructure
- Avoid billions in future losses through flood planning and mitigation
- Create
 - the world-class lowa Flood Center
 - a national flood mitigation model

The story continues

The Iowa Watershed Project and Iowa Watershed Approach

- Demonstrated significant flood mitigation effects
- Won Iowa an additional \$96.9 million in CDBG-NDR to fund mitigation efforts
- Is building new mitigation projects in 9 additional Iowa Watersheds
- Will make lowa even more flood resilient



Iowa Watershed Approach Background

- September 2014: Housing and Urban Development (HUD) CDBG-National Disaster Resiliency competition
 - Almost \$1 Billion for disaster recovery and long-term resilience
 - In partnership with Rockefeller Foundation
 - Two-phase process
 - Tied to disasters declared in 2011, 2012, or 2013
- March 2015: Phase I application submitted
 - Framing phase
 - Iowa one of 40 applicants invited to next round
- October 2015: Phase II application submitted
 - Performance metrics specifically negotiated



Iowa Watershed Approach Background (continued)

- January 2016: Award to Iowa announced
 - lowa one of 13 recipient
- October 2016: Partner contract startdate
- September 2021: Partner contract end date
- September 2022: NDR Statutory end date



Iowa Watershed Approach (IWA): Program Goals

- Reduce flood risk
- Improve water quality
- Increase resilience
- Engage stakeholders through collaboration and outreach/education
- Improve quality of life and health, especially for vulnerable populations
- Develop a program that is replicable throughout the Midwest and the United States



Iowa Watershed Approach (IWA):

- Look at water resiliency from a watershed perspective (how water flows, not by municipal boundaries)
- Identify watersheds in areas of repetitive damage (presidentially declared disasters between 2011-2013)
- Look at urban infrastructure improvements within a watershed
- Consider housing rehabilitation for resiliency within a watershed
- Use a Watershed Management Authority (WMA) model (dependent on multi-municipality coordination within the watershed)
- **Provide** planning and technical assistance to set up WMAs where not currently active.
- **Design**, engineer and implement watershed management practices to hold, cleanse and strategically manage water within the watershed.

National Disaster Resiliency CDBG-NDR

The Iowa Watershed Project and Iowa Watershed Approach

- Collaborative planning with more than a dozen partner organizations to reduce flooding, improve water quality, and make Iowa lands and communities more resilient.
- Consists of Housing Resiliency, Urban Infrastructure, Watershed Practices and Planning.



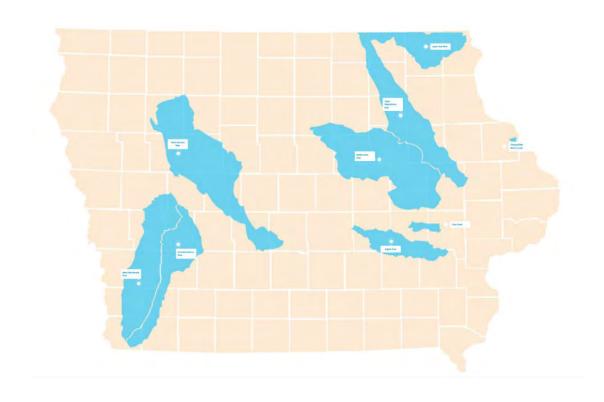






National Disaster Resiliency CDBG-NDR

- 8 Watershed Management Areas (WMA)s
- •1 Urban Watershed –City of Dubuque, IA

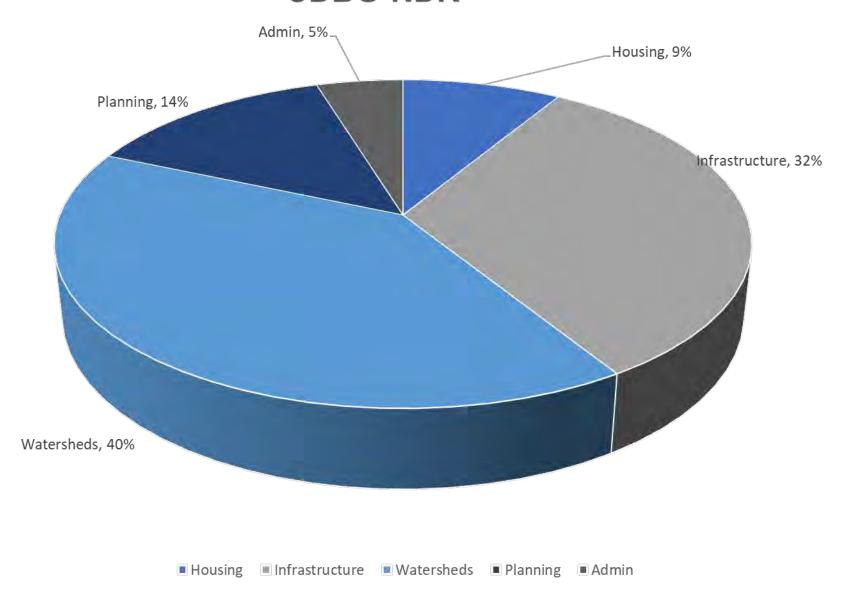


Iowa Watershed Approach Contract Partners

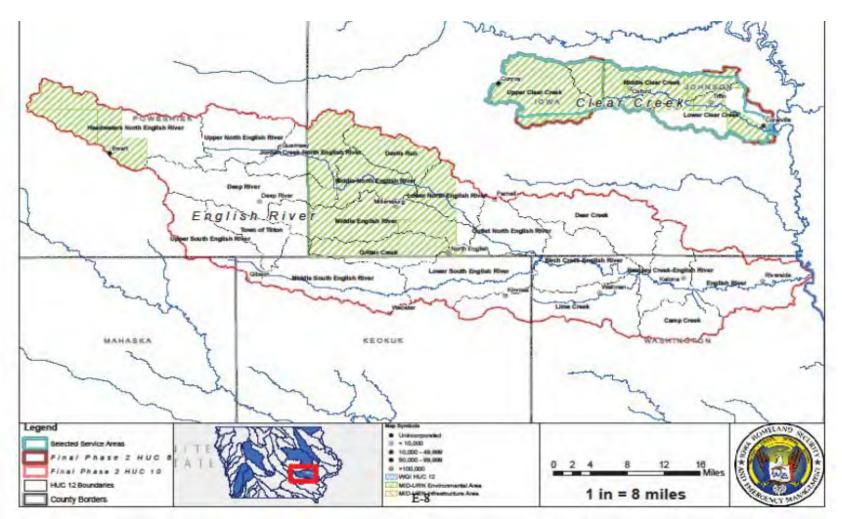
- Infrastructure: Cities of Dubuque, Coralville and Storm Lake
- Housing: City of Dubuque
- Planning: University of Iowa, Iowa State University, University of Northern Iowa, Iowa Homeland Security and Emergency Management, Department of Natural Resources, Iowa Department of Agriculture and Land Stewardship
- Watersheds: 8 Counties representing watersheds
- Administration: Iowa Economic
 Development Authority



CDBG-NDR



National Disaster Resiliency CDBG-NDR

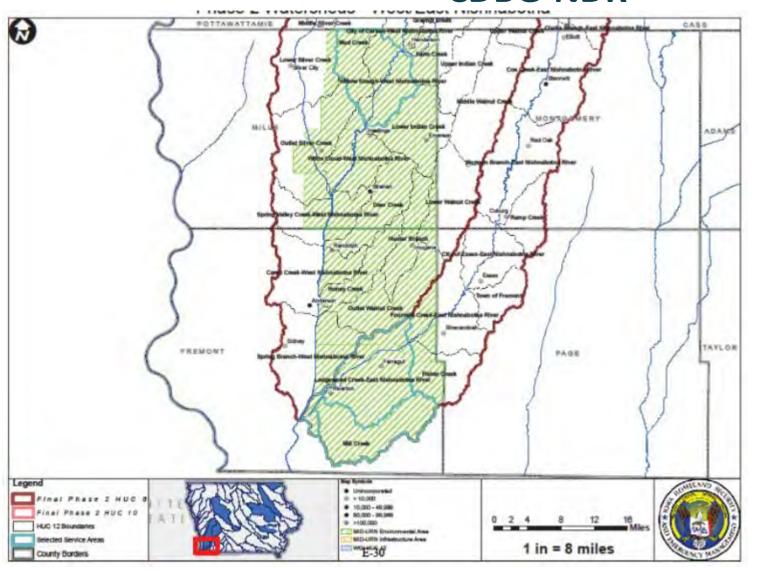


Challenges of Resiliency

- Limitations on the locations of eligible projects:
 - MID-URN
 - Declared Counties
 - Municipal Boundaries
 - Down Stream Impacts

Water doesn't seem to want to stay within municipal boundaries

National Disaster Resiliency CDBG-NDR



Challenges of Resiliency

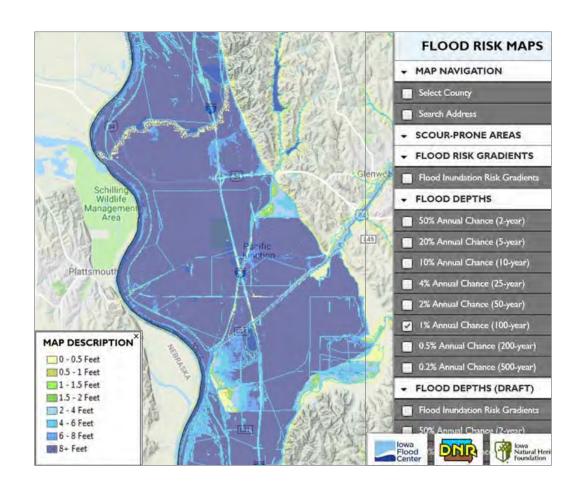
- Limitations on the locations of eligible projects:
 - MID-URN
 - Declared Counties
 - Municipal Boundaries
 - Down Stream Impacts

The practice location with the most impact may not be within the MID-URN.

The story continues

2019 - More Iowa Flooding

- March 2019 Flooding
- Primarily along the Missouri River (boarder between Iowa and Nebraska)
- Multiple Levee Breeches
- Flooding inundation that lasted
 4-6 weeks at record height
- Regional impact to SW lowa



EDA Disaster Supplemental Funding Opportunity

Supplemental Appropriations for Disaster Relief Act, 2019 was passed by congress and signed into law on June 6, 2019

Supplemental Appropriations Act, 2019

This bill provides \$17.2 billion in FY2019 supplemental appropriations to several federal departments and agencies for expenses related to the consequences of recent wildfires, hurricanes, volcanos, earthquakes, typhoons, and other natural disasters.

The funding provided by this bill is designated as emergency spending, which is exempt from discretionary spending limits and other budget enforcement rules.

The bill includes appropriations for

- the Department of Agriculture,
- the Department of Commerce,
- · the Department of Justice,
- . the Department of Defense.
- · the U.S. Army Corps of Engineers,
- · the Department of the Interior,
- the Department of Energy,
- . the U.S. Coast Guard.
- · the Environmental Protection Agency,
- · the Forest Service,
- · the Department of Health and Human Services,
- . the Department of Labor,
- the Department of Education,
- · the Government Accountability Office,
- . the Department of Veterans Affairs,
- · the Department of Transportation, and
- · the Department of Housing and Urban Development.

TITLE II

DEPARTMENT OF COMMERCE ECONOMIC DEVELOPMENT ADMINISTRATION

ECONOMIC DEVELOPMENT ASSISTANCE PROGRAMS

(INCLUDING TRANSFERS OF FUNDS)

Pursuant to section 703 of the Public Works and Economic Development Act (42 U.S.C. 3233), for an additional amount for "Economic Development Assistance Programs" for necessary expenses related to flood mitigation, disaster relief, long-term recovery, and restoration of infrastructure in areas that received a major disaster designation as a result of Hurricanes Florence, Michael, and Lane, Typhoons Yutu and Mangkhut, and of wildfires, volcanic eruptions, earthquakes, and other natural disasters occurring in calendar year 2018, and tornadoes and floods occurring in calendar year 2019 under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), \$600,000,000, to remain available until expended: Provided, That such amount is designated by the Congress as being for an emergency requirement pursuant to section 251(b)(2) (A)(i) of the Balanced Budget and Emergency Deficit Control Act of 1985: Provided further, That within the amount appropriated, up to 2 percent of funds may be transferred to the "Salaries and Expenses" account for administration and oversight activities: Provided further, That within the amount appropriated, \$1,000,000 shall be transferred to the "Office of Inspector General" account for carrying out investigations and audits related to the funding provided under this heading.

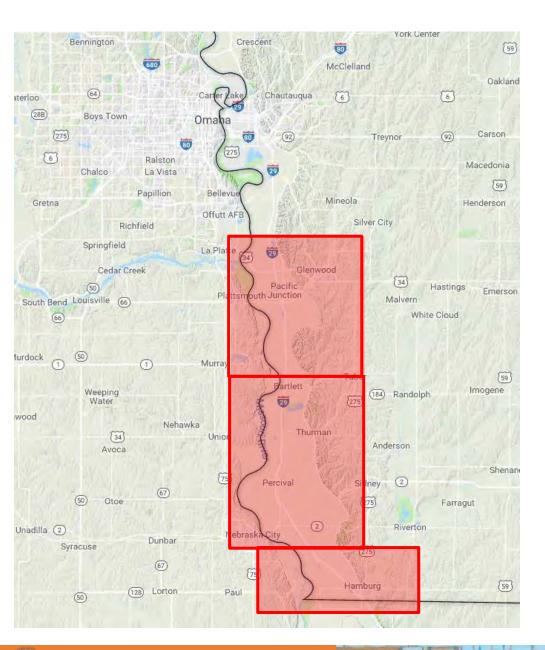
EDA Disaster Supplemental Funding Opportunity

Supplemental Appropriations for Disaster Relief Act, 2019 was passed by congress and signed into law on June 6, 2019

U. S. Department of Commerce's Economic Development Administration opened competitive application funding in late August 2019.

EDA REGIONAL OFFICE ¹	DISASTER SUPPLEMENTAL ALLOCATION
Atlanta / ATRO	\$140,000,000
Austin / AURO	\$50,000,000
Chicago / CRO	\$50,000,000
Denver / DRO	\$107,000,000
Philadelphia / PRO	\$50,000,000
Seattle / SRO	\$190,000,000





EDA Disaster Supplemental Funding Opportunity

State of Iowa Application for EDA Supplemental Disaster Funds

Comprehensive Land Use Planning along the Missouri River Natural Valley.

Three Distinct Plans:

- 1. Mills County Focus on 1-29 & Hwy 34 Interchange. Including assessment of Pacific Junction, analysis of future land use, transportation, rail and commerce, etc.
- 2. Fremont County Focus on 1-29 & Hwy 2 Interchange.
- **3. Fremont County** Focus on I-29 & 310th St specifically providing creative placemaking analysis for Hamburg along with analysis of future land use, infrastructure needs, etc.

La Vista Papillion Mineola Silver City (34) 184) Randolph Anderson 67 Riverton Dunbar (67) Hamburg (128) Lorton

EDA Disaster Supplemental Funding Opportunity

State of Iowa Application for EDA Supplemental Disaster Funds

Comprehensive Land Use Planning along the Missouri River Natural Valley.

Partners and Possible Deliverables:

- ❖ IEDA to procure a professional planning consultant with land use planning experience and engineering for concept development. IEDA will also subcontract with all co-applicant partners:
 - ❖ Iowa DNR to coordinate with planner on regulatory floodplain mapping changes.
 - ❖ **lowa DOT** to coordinate with planner regarding improvements/changes to highways, local roads and rail infrastructure.
 - Iowa Flood Center to provide flood mapping/modeling based on plan alternatives.
 - Local Regional Planning (MAPA & SWIPCO) to provide community engagement forums and align planning to the regional Comprehensive Economic Development Strategy (CEDS) plan
 - Safeguard Iowa Partnership to provide disaster resiliency training to businesses in the affected area.
 - **HSEMD** to facilitate involvement of county emergency management officials and conformance to local hazard mitigation plans.
 - **DALS** to coordinate discussions of future land use as it relates to Agriculture

80 McClelland Chautauqua Mineola Offutt AFI Silver City (34) 184) Randolph Nehawka Thurman Anderson (67) Riverton Dunbar (67) Hamburg (128) Lorton

EDA Disaster Supplemental Funding Opportunity

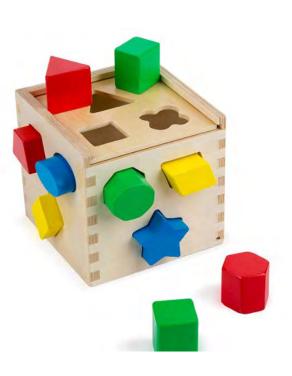
State of Iowa Application for EDA Supplemental Disaster Funds Comprehensive Land Use Planning along the Missouri River Natural Valley.

Goals for the Plan:

- Generate Regional approaches to river and stormwater management.
- Identify transformative projects and a disaster recovery funding source (as this is EDA funded, particularly look for Economic Development projects that are eligible to apply for the remaining EDA Disaster Funds)
- Assess Levee Management practices (ownership, maintenance, etc.) in the region and the state.
- Make Recommendations to the State Legislature for how best to standardize levee management around the state
- Provide local city planning for most impacted communities look for redevelopment opportunities outside of the flood risk.
- Make recommendations to the State for funding of programs where no other federal or state resource currently exists.
- Help inform other disaster recovery efforts such as the CDBG-DR Action Plan.

2019 CDBG-DR DRAFT Action Plan

- HUD Allocation to Iowa \$96,741,000
- 80% of funds must be spent in the Most Impacted and Distressed & Unmet Recovery Needs Areas (Mills County and 51640 (Fremont County).
- Public Law 116-20 Federal Register Notice Dated January 27, 2020
- State of Iowa's Goal: <u>Match the best disaster need with the best disaster funding source</u>
 - Know what FEMA is funding and where match is the best and highest use of funds
 - Use planning efforts in place to help inform remaining needs.
 - Find needs that have no other funding source and serve our most vulnerable population such as new production of affordable housing.
 - Maximize administrative capacity by offering limited programs with significant impact and LMI benefit.





Louisiana Watershed Initiative

Evelyn Campo, Louisiana Office of Community Development





Agenda

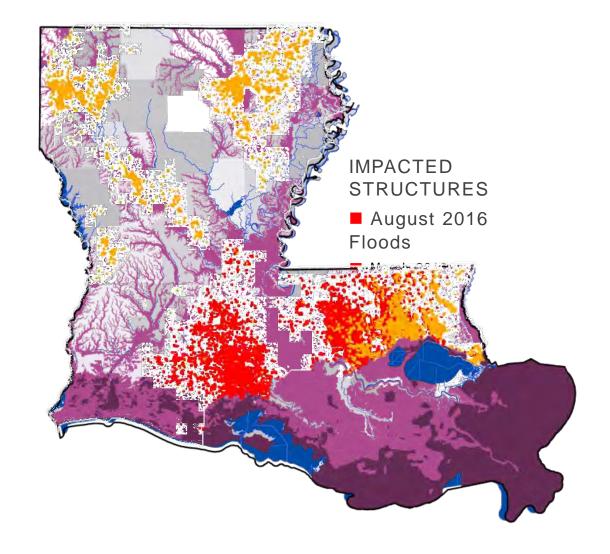
- Overview of the Louisiana Watershed Initiative
- Program Development
- Programs Underway
- Coordination and collaboration
- Engagement





2016 March and August Floods

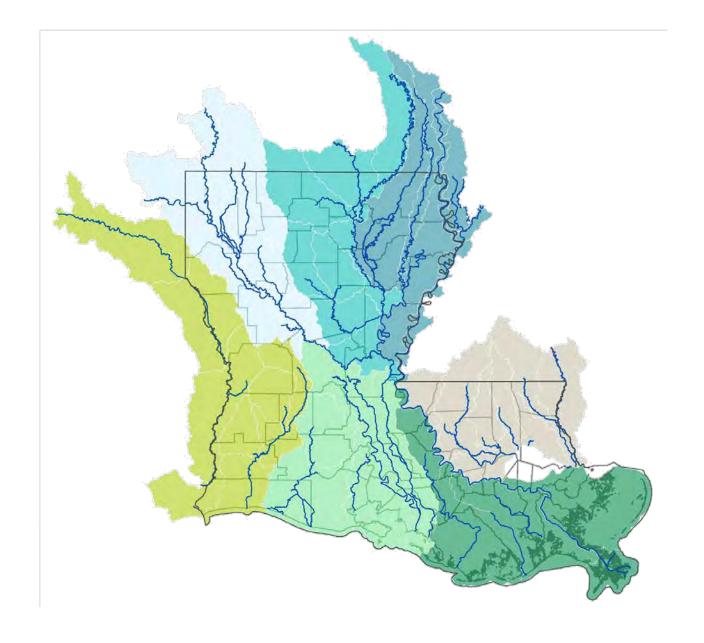
- 145,000 structures affected
- More than 7.1 trillion gallons of rain



SOURCE: FEMA

The Challenge

- Flooding does not follow political boundaries, as major watersheds cross parish and state lines.
- Actions in one community can impact entire systems.



Guiding Principles

- Scientific Tools and Approaches
- Transparent and Objective Decision Making
- Maximizing Natural Function of Floodplains
- Regional Water Management



RED RIVER, GRAND ECORE



Action Plan

- Submitted to HUD Dec. 23, 2019
- Received HUD approval Feb. 20, 2020
- Details how the state will spend \$1.2 billion CDBG-MIT funds to reduce statewide flood risk
- Includes more than \$970 million for watershed projects and programs, as well as funding for improved data gathering and scientific modeling



BOGUE CHITTO RIVER, FRANKLINTON

Our focus in spending these funds

WATERSHED MODELING

- High-quality gauge network
- Watershed models and maps
- User-friendly data portal

FLOOD CONTROL PROJECTS

- Enhanced retention, drainage and protection
- Efforts to move people out of harm's way

REGIONAL PROGRAMS

- Regional watershed coordination
- Better building and land use practices to lessen impacts of future floods

SOURCE: NOAA



River and Rain Gauge Network

SCIENCE-BASED UNDERSTANDING OF RISK

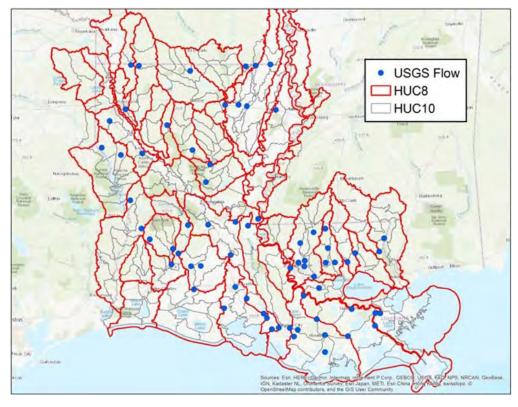
MONITOR WATER LEVELS, FLOW RATES AND RAINFALL IN LOUISIANA WATERSHEDS

SUPPORT CALIBRATION OF LWI MODELS

PROVIDE REAL-TIME RIVER HEIGHTS

INFORM WATERWAY AND WATERSHED MANAGEMENT

AROUND LOUISIANA WATERWAYS



USGS FLOW GAUGES IN LOUISIANA

A Collaborative, Stakeholder-Driven Approach

- Develop a backbone network in collaboration with USGS and federal, state and local agencies
- Solicit stakeholders' suggestions for new gauge infrastructure and gauge locations
- Revise network design to incorporate stakeholders' input
- Engage DEQ and USGS to support the deployment and operation of the network



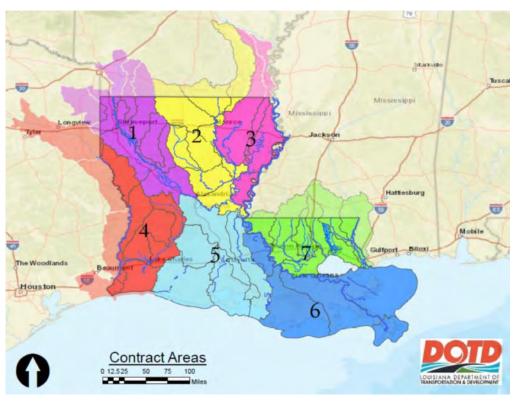
STAGE SENSOR AT COULEE MINE IN LAFAYETTE

SOURCE: UL LAFAYETTE

Statewide Watershed Modeling Effort

SCIENCE-BASED UNDERSTANDING OF RISK

- Modeling guidance creates consistency in models statewide and enables evaluation of projects with regional impacts.
- The state issued RFQs for developing models in May 2019, and procurement is complete.
- Modeling will be conducted at the HUC8 scale, consistent with watershed boundaries.
- Gauge network data will enhance modeling outputs.
- This approach aligns with USACE and FEMA methods.



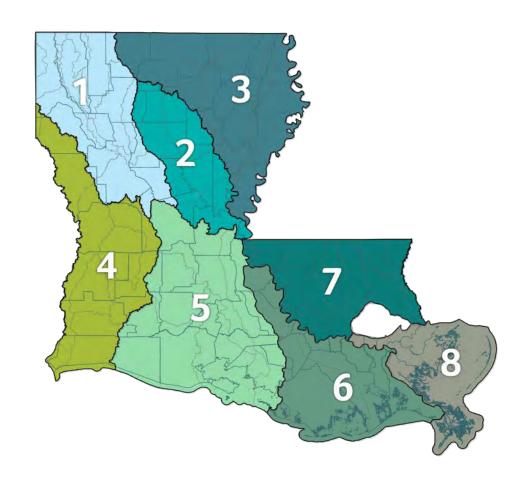
MAP OF DOTD MODELING AREAS

Watershed Coordination

Watershed region boundaries facilitate regional coordination and project prioritization.

The state awarded \$400,000 per watershed region to:

- Form steering committees (year 1)
- Select a long-term regional governance framework
- Cultivate staff capacity in outreach and floodplain management



Watershed Projects Grant Program Funding

LOCAL AND REGIONAL - ROUND 1

UP TO \$100 MILLION



Projects selected by score

UP TO \$40 MILLION

Projects selected by region (Up to \$5 million per region)







"It's harder. It requires more work. It's politically risky, but it is the right thing to do."

-GOV. JOHN BEL EDWARDS

Council on Watershed Management









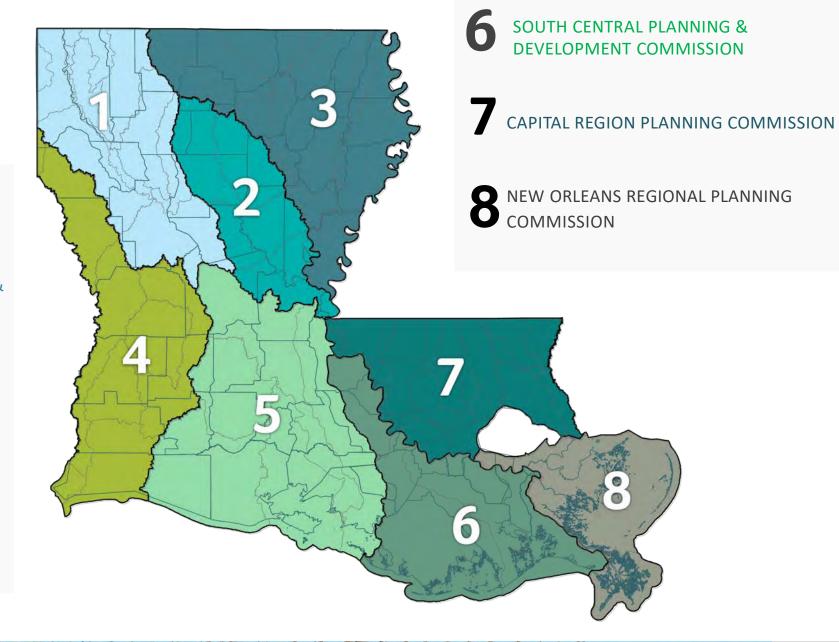


A Shared Focus on Resilience



Coordinating Agencies

- THE COORDINATING & DEVELOPMENT CORPORATION
- 2 KISATCHIE-DELTA REGIONAL PLANNING & DEVELOPMENT DISTRICT
- 3 OUACHITA PARISH POLICE JURY
- 4 CALCASIEU PARISH POLICE JURY
- 5 ACADIANA PLANNING COMMISSION





Louisiana Watershed Initiative Listens

LOCALS INFORMING THE PROCESS

FALL 2018

Regional conferences

555

Engineers, planners, floodplain managers, public works staff, emergency responders, code enforcement staff, elected officials and more



2018 STATEWIDE LISTENING TOUR

Louisiana Watershed Initiative Listens

NATIONAL EXPERTS INFORMING THE PROCESS

WINTER 2019

Days in hard-hit areas

Local, state and national experts in attendance and more than 1,000 who joined online



BEST PRACTICES SUMMIT

Louisiana Watershed Initiative Listens

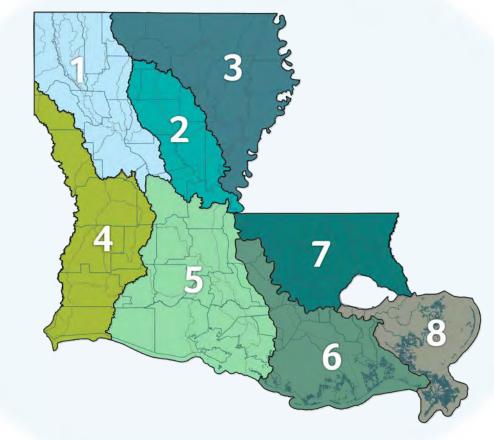
LOCAL LEADERS INFORMING THE PROCESS

APRIL - JUNE 2019

34 Meetings

355 Attendees representing 64 parishes

1 2 1 Public comments



PARISH LEADERSHIP MEETINGS





Resources

HUD Exchange CDBG-DR page:

https://www.hudexchange.info/programs/cdbg-dr/

HUD Exchange CDBG-MIT page:

https://www.hudexchange.info/programs/cdbg-mit/

• Iowa Economic Development site:

https://www.iowaeconomicdevelopment.com/community/

Louisiana Watershed Initiative site:

https://watershed.la.gov/



Thank you!

Contact Info

- Lauren Nichols, <u>Lauren.Nichols@icf.com</u>
- Ann Schmid, <u>ann.schmid@iowaeda.com</u>
- Evelyn Campo, <u>Evelyn.Campo@la.gov</u>
- HUD Policy Unit, <u>DRSIPolicyUnit@hud.gov</u>