

FHEO Requirements on CDBG-MIT Action Plans

Please stand by for real-time captions

Welcome to today's webinar on fair housing and equal opportunity. It is with the CDBG-MIT program. We have representatives from the warehouse and equal opportunity will speak today. A few housekeeping items. Today's webinar will be recorded and made available at a later date. The recording webinar slides and transcript posted onto the exchange. It will be at a later date. Participants are in listen only mode. If there are any content related questions anything presented for today, please submit your content related questions to the Q&A box on the right side of your screen. The host, presenter and panelist will monitor those. We will work to answer questions at the end of today's presentation. Please be patient with us for that. If you have any technical issues, please submit any technical related issues to the Q&A box on the right side of the screen. The host will monitor, and we will work with you directly to resolve issues. I would like to acknowledge our house, Ms. Jo-Shani Clemmons. She has been extremely helpful getting us set up for today. As well as webinar is that we present up to today. I would like to acknowledge her and thank her for all of her help. With that I would like to turn it over to Jo-Shani Clemmons for a quick word.

Good afternoon all. My name is Jo-Shani Clemmons and I work with the HUD learn. I am the administrator of Adobe connect. Just a few housekeeping things just to continue off of work Roosevelt had said previously. If you notice there are four boxes on the right side of your screen. Under the attendees boxes as click to eval. If you click onto that link it will take you to the survey monkey. He will be able to complete your level I evaluation. Under that box entitled files to download. There is a PDF formed format presentation saved in this box for you, as well is a document that your presenters will further explain. All you have to do is click onto whichever document you would like to attain, and the download file box will appear. It will allow you to either save, prints, view however you would like to do whatever you want to do with those documents. Under that box is the Q&A box. That is where Roosevelt will direct you for any questions, comments, concerns or thoughts. That concludes everything that I have to actually relate to you guys. Have a great meaning. Back to you, Roosevelt. Smacked thank you so much. Because of the technical nature of today's webinar, and getting into the fair housing equal opportunity requirements, I would like to encourage those listeners today who want to dive deeper here on the materials, to download the technical assistance document. Please reference that document as the presenters speak today. I wanted to mention that to you as well. Today's webinar titled fair housing and equal opportunity review requirements on CDBG-MIT action plans. Again we are very excited to have our representatives from fair housing and equal opportunity to

present for today. This is a part of our 2020 CDBG-MIT webinar series. We are winding down the series because this is our next-to-last webinar. We are very excited to have speakers come in to support us today for this.

I would like to do some quick introductions. First we have Ms. Celia Carpentier. She's with the U. S. Department of Housing and Urban Development. Ms. Carpentier is an acting develop program standard and compliance division. She is in the HUD equal opportunity in housing. Thank you so much for joining today.

Next we have Ms. Jennifer Carpenter also with the U. S. Department of Housing and Urban Development. She is the assistant director of policy for the disaster recovery and special issue division. Under CPD at HUD. 12 years worked with various programs.

Including 6 years with the team responsible for managing the neighborhood stabilization program. Thank you for supporting us today with this webinar.

Next we have Mr. Jefferson or Seth McIntyre, he is a civil right and urban development professional working for the U. S. Department of Housing and Urban Development. The U. S. Department of State, the U. S. agency for international development and United Nations Commissioner for the refugees. His work experience across civil and human rights disaster recovery, housing, accessibility and him close urban development. With HUD equal opportunity, he reviews proposed regulations, policies, department guidance, congressional records and [Indiscernible]. Action plans with the civil rights and fair housing. Within disaster recovery he has worked on it involves the review and assessment of CPD's and CDBG-MIT action plans and potential impacts on racial and ethnic minorities, persons with disabilities, and limited English proficiency. Populations as well as other protected classes. He has reviewed action plans for over \$20 billion, and federal relief funds and conducts trainings, webinars, and technical assistance on civil rights related matters. In addition he is a part of the interdepartmental efforts to develop the citizen presentation. It provides grantees with best practices for community participation. And outreach as well as considerations for equitable program design and other civil rights related issues. Thank you so much for joining us.

We have Bonnie Neukom which is the U. S. Department in housing development. She is a CPD's specialist with the division of disaster recovery and special issues, and the policy led by Jen. My name is Roosevelt Grant, I am with the U. S. Department of Homeland Security, emergency management agency, and on quotation from FEMA and I support the mitigation grant program.

With that I will turn it over to Jen who will go over the presentation agenda.

Thank you. Thank you everyone for joining today. As mentioned we want to encourage you all to download the file, the PDF file in the files to download box so you have the PDF and you can follow along today. We are issuing this tackle document -- technical document focusing on requirements and requirements that may have [Indiscernible]. I want to walk the folks through a little bit on how the document is working before we focus on the agenda. If you have the documents opened you will be able to see we have identified the specific requirements and guidance. Taking get word from work. And the rest of the document is focused around providing technical assistance. Recommendations, best practices, tips. And real-world examples of what you might see once you get down to the project level. While the technical assistance document focuses on things you need to address in your action plan, we did want to go down and talk about what it means practically. And in the real world what it ends up looking like. That is why we brought in those examples. You will see in some cases we are recommending and giving you steps on how to meet the requirements in the action plan. We are also encouraging our grantees to go above and beyond those requirements, and to think about best practices and how to go beyond just the requirements. We want to encourage grantees to think about these issues, think about these fungal populations, -- fungal populations and focus on the action plan. And so we want to give you the tools to be able to do that.

You can see when you look at the document, and when you look at the PowerPoint, a lot of drafts that we have had help from. A lot of different program folks on both sides. We were very careful with the language we use. And so it is clear to you as the grantee and requirements. As well as recommendations and tips that we are providing.

Today we want to give some background on the CDBG-MIT program. Most of you are grantees in a mill be -- it will be familiar. You may be interested in mitigation and we want to give the background. We will turn it over to the colleagues and fair housing and focus on the overview of their requirements. And specifically the requirements in the Federal Register notice. And then Bonnie and myself will focus on some additional requirements. They are not under the umbrella fair housing are somewhat related and so we included in the guidance to give grantees help on writing those sections and action plans. And then we will turn it over to Roosevelt to summarize the webinar for the day. And then we will provide resources. Hopefully, we will have some time for questions if folks can put questions in the Q&A box. With that I will turn it over to Bonnie.

Thank you, Jen. The CDBG mitigation grant is a new funding source in the sense that this funding focuses to carry out strategic and high-impact activities to mitigate against disasters and reduce future losses. This differs from the typical disaster recovery funds. First of all your activities must meet the definition of mitigation. And mitigation is defined where activities increased resilience, and to disasters. And reduce or eliminate the long-term risk of loss of life, injury, damage and loss of property. And suffering and hardship by lessening the impact of future disasters. In your mitigation needs assessment you are identifying both current and future risks, and your most compact and distressed areas. Thirdly activity must also be CDBG eligible either through a waiver or alternative requirements. Lastly all of your activities must meet a national objective which for the most part is the same as the CDBG program. We did eliminate the national option. But if you would like to use this national objective option, you can make the waiver request. Additionally we have added two extra criteria for national objectives. Urgent need mitigation and covered projects.

HUD has a few goals with funding and this slide shows the policy of activities with this funding. Which are to rely on data informed investments, especially where there has been repetitive loss as well as building capacity, to analyze and address disaster risks and update those hazard mitigation plans. Also emphasis on supporting the adoption of policies that reflect both local and regional priorities. And it will have a long-lasting effect in risk reduction to include risk reduction of community lifelines. Lastly maximizing the impact of funds by encouraging leveraging, partnerships and coordination with other federal dollars.

The mitigation needs assessment are different than your typical disaster recovery needs assessment. You are looking at your current and future risks and determining how you can reduce them rather than filling gaps of unmet needs. In these risk-based assessments risk can be assessed both quantity and qualitatively through various methods, but generally you are looking at your hazards and comparing them to your community assets. You will want to use this exercise to determine what your most significant risks are, and other vulnerabilities, using this information to determine your mitigation strategy and what it looks like.

In addition grantees must consider those indispensable services that can be effective when the disaster occurs and you can identify activities that will reduce risks in order for the community to be able to continue to provide critical business and government functions, and those services that are critical to human health and safety or economic security. There are seven critical service areas which are safety and security, communications, food, water, sheltering, transportation, health and medical services, hazard material management and energy.

Now I will turn it over to Cecelia who is going to provide an overview of the FHEO requirements.

Thank you, Bonnie. I am trying to advance to the next slide. Before we go into the specific action related to housing and civil rights I will start by providing a quick overview of the fair housing and civil rights laws that apply to the CDBG mitigation program. They are listed on the slide. And include title six of the civil rights act of 1964. The title six prohibits discrimination on the basis of race, color or national origin in programs and is receiving federal financial assistance. Some other titles -- grantees must use reasonable steps to have access to activities for persons as a result national origin have a limited ability to read, speak, write or understand English. In other words limited English proficiency.

The next laws title eight of the civil vacante 1968. As the fair housing act. And it. Rabbits discrimination -- prohibits discrimination. Religion, sex, disability and status in the rental or financing of housing. There fair housing act requires housing provider make reasonable accommodations and reasonable modifications for persons with disabilities, and also requires that certain multifamily dwellings contain certain accessible design features for persons with disabilities.

The fair housing act requires HUD affirmatively offer fair housing and in turn requires recipients including CDBG mitigation grantees. The next is section 109 of the housing and community development act. Prohibits dissemination on the basis of race, color, national origin, religion, and programs and activities with assistance under title I of the housing and community development act of 1970 four. Including the CDBG program. Section 504 of the rehabilitation act of 1973 rabbits discrimination on the basis of disability and provides [Indiscernible] receiving federal financial assistance. Now HUD implementation regulations for section 504 include various requirements among other things being requirements of recipients provide effective communication for persons with vision, hearing or other speech impairment or communication related disabilities. And fiber for regulations also require that HUD multi-assistant housing and a number of us as well units for persons with disabilities. Now title II of the Americans with disability act permits discrimination on the basis of disability and all services, programs and activities providing by state and local governments. While title III prohibits discrimination on the basis of disability in public accommodation. Finally the age discrimination act prohibits discrimination on the basis of age, and programs and activities receiving full financial assistance.

Taken together these laws and HUD regulations outline a series of prohibited practices and required affirmative practices that grantees must comply. We mentioned some of these on the slide preceding this one. That means in addition to prohibiting

discrimination, these laws also prohibit recipients from engaging in activities that create or increase our reinforced segregation. It also includes specific actions in order to provide equal opportunity to persons with disabilities, such as writing accessible housing, making reasonable accommodations as we mentioned earlier. In addition these laws require that HUD recipients mediate the effects of any past discrimination. The civil right regulation imposed an obligation of financial assistance to take legal action to remove or overcome the consequences of prior discrimination. For example in a community with a history of law, policies that result in racial segregation or other forms of discrimination, for example title VI of the civil rights act require recipients to take reasonable steps [Indiscernible] of past discrimination.

Next we will go over the specific fair housing and rights requirement of the CDBG mitigation notice published August 2019. We are going to start by handing it over to my colleague Seth. He will go over the requirements of section VA to A 4 of the federal registration notice.

Thank you. As discussed we are going to look over the requirements under the CDBG Federal Register notice. Specifically looking at the requirements under the notice to is referred to civil rights related requirements. Doing a quick overview, the CDBG-MIT Federal Register notice requires grantees to assess how the use of CDBG-MIT funds may affect members to protected classes under the fair housing and civil rights laws, racially and ethnically concentrated areas as well as concentrated areas of poverty.

In addition grantees are also required to look at the way in which natural hazards may have an impact on protected classes. And looking at how CDBG-MIT funds may be used in a way to promote resiliency in the event of a natural disaster.

Let's look at a deep dive. Let's discuss the ways in which grantees may approach this requirement. First we have outlined a three-step process that can help to read and structure the way in which the requirement is met. The first one is step one. This recommendation comes from having reviewed a handful of action plans. We see that the first thing that grantees should do is to collect data and the grantee identify the most impacted and distressed areas. And to identify the following. Racial and ethnic minorities. Limited English proficiency's, persons with disabilities, other protected classes that might be in the area when you think about protective classes. Looking at the fair housing act or title six of the Civil Rights Act of 1964. It is race, color, national origin, religion, sex, familial status and disability. And also looking at racially and ethnically concentrated areas as they overlap with concentrated areas of poverty.

At this first step much of this data can be found through the U.S. Census data and the Americans community survey data. Or it can be quickly calculated through a number of HUD pools, in particular [Indiscernible] which takes that data and able to calculate areas of minority concentration. We also know that there are additional data sources and we welcome them. We have seen state and local data and knowledge folder illustrate protected class graphics, in particular localities. And we welcome any information or local knowledge such as information gathered during community participation, consultations with local and state original planning departments, academics sources or any other areas of local knowledge that may be relevant.

Step two is about analyzing this data. What we ask is that using the data that is gathered, seeking and wanting this information to be analyzed, along with racially and ethnically concentrated areas and concentrated areas of poverty. -- Poverty. Recommend all three data sets be available, and not to necessarily exclude anyone or assume that the information gathered from one data set is going to be the same as the information gathered from another. Other detected costs data that may be relevant as mentioned before, including disability data or LEP data. We also realized there may be more than one way to show demographic data. If it makes sense to provide the data at a smaller scale, such as that the town level, neighborhood level, [Indiscernible] by all means include this information. When presenting demographic data you can go a step further and demonstrate the overlap of the status of poverty at the individual scale.

Bear in mind grantees are required to assess potential impact, future natural hazard, disaster, minority and [Indiscernible] communities. One way is to merge demographic data and data of natural hazard related data, FEMA disaster assessment or social vulnerability index. The use of these tools is recommended, however the data should be partnered with demographic data. It is not adequate substitutes along for the requirement to assess how the use of CDBG-MIT funds may affect members of protected classes.

Overall step two is about understanding demographic data and to more accurately assess how the use of CDBG-MIT funds will affect those protected classes. This now brings us to step three.

Under step three utilizing the information gathered from step one, the assessment from step two. And then position in such a way as to understand how the use of CDBG-MIT funds may affect members of protected classes.

Recommendations to think about in step three. Consider providing the following information. How the use of CDBG-MIT funds may affect members of detected classes, racially and ethnically concentrated areas and concentrated areas of poverty. How they

will be prioritized. In a way that will first not disadvantage members of protected classes, including residents of racially and ethnically concentrated areas, and how the funds might help overcome the effects of prior discrimination based on protected class. In the absence of prior discrimination, help overcome the effects of conditions, resulting in limitations of their participation. Also thinking about the documentation of efforts in the ways in which you as engaged members of the protected classes and specifically identified their mitigation needs amongst these groups. Participation is one area to document and shall. Basco and shall.

Finally let's discuss a couple of examples. An example of number 1. If you are in a locality that is prone to wildfires, one way to meet this requirement that we have discussed is to consider how a protected class is best protected from future events. Knowing that wildfires may occur in the future. Emergency planning and mitigation strategies could be prioritized for those areas to ensure protection of those protected classes in the future.

In an area prone to floods. A grantee may prioritize funding for drainage study. And prepare and adopt an eligible stone water drainage plan and ordinance in order to protect protected classes within the area. Or number 3, a grantee using CDBG-MIT funds to mitigate the disaster risk to single-family homes and multifamily rental developments may assess whether CDBG-MIT funds are being invested equitably, and to benefit members of protected classes, racially and ethnically concentrated areas, or concentrated areas of poverty.

Next we will discuss additional related CDBG-MIT requirements.

Thank you, Seth. We will talk about the requirements at section VA to a six of the FR notice which requires that each grantee must describe its plans to minimize and displacement of persons or entities. And how it will assist any persons or entities displaced through mitigation activities. Federal Register notices reminder that grantees must take into consideration the functional needs of persons with disabilities, in the relocation process.

To meet this requirement HUD recommends that grantees during very early stages of planning and development, recognize problems associated with displacements of individuals, families, and nonprofit organizations, farms as it develops solutions to minimize the adverse impacts of displacement. Grantee should be aware that general displaced persons are eligible for relocation assistance and payments under the uniform relocation assistance and real property acquisition act of 1970, also URA. And the grantee will want to adopt processes and procedures to ensure applicable requirements are satisfied and include the steps of a grantee will take to minimize displacement. HUD encourages grantees to engage in any potentially displaced populations as a

part of the citizen participation efforts and by doing so you may be able to help determine whether there are alternatives that will help mitigate the identified risks from disasters without causing displacement.

In the context of a fair housing and civil right obligation, the grantee may want to spend or pay special attention to programs and projects that may result in the displacement of minority communities, particularly those communities with racial, ethnic, religious or cultural significance. As a best practice, the grantee may want to describe an action plan to take steps to minimize displacement of these populations such as reaching out to these populations early in the planning process to determine their relocation needs, and whether there may be alternatives that would will mitigate risk and disaster causing displacement. A grantee main need to take steps to engage these communities such as working with local community-based organizations and providing materials and information in languages other than English. Grantees are encouraged to consider the impact that any displacement activities would have on persons with disabilities. As a best practice grantees may wish to describe the action plan how they will take into consideration the personal needs of persons with disabilities and the relocation process, and the assistance that they will provide to displaced persons with disabilities to ensure that they are able to relocate to housing that meet accessibility needs, and accessible to any supportive services that they may need in order to live in the community.

Next we will talk about the federal register notice requirements. Requires that each mitigation program provide a direct benefit to a person, householder business, and the grantee must specify the maximum amount of assistance available to a beneficiary under each of the grantees mitigation programs. To meet these requirements, this information -- I'm sorry, the grantee must describe the process it will used to make exceptions to the maximum award amounts. And indicate making exceptions to the maximum award amount when necessary to comply with federal accessibility standards or to reasonably accommodate a person with disabilities. If you meet this requirement this information that we describe must be included in the action plan. Furthermore as a best practice, HUD recommends that grantees adopt policies and procedures that govern the maximum award amount. Communicate the maximum amount and then exceptions and determine the circumstances when an exception is needed including when necessary to comply with federal disability standards are to recently accommodate a person with disabilities. Also adopt policies and procedures to demonstrate cost necessary and reasonable. In the context of grantee fair housing obligation, HUD recommends grantee work with sub recipients to make exceptions to the maximum award amount when necessary to comply with federal standards or to reasonably accommodate a person with disability.

Some examples of what may be appropriate to make exceptions to the maximum award amount include for example, when a grantee may be looking to increase the resilience of radical small businesses in the most impacted distressed area. Grantee Molly need to make an exception to the maximum award amount to ensure that the business complies with applicable requirements including title III of the Americans with disabilities act. Another example would be when grantees are having a program to provide financial assistance to homeowners in flood prone areas to help elevate their homes. In this case a grantee may be making an exception to the maximum award amount for households with disabilities in order to help the person with impairment - - to ensure that when elevating the homes that they are able to include any structural features that would be necessary for the person with mobility impairment to still be able to access the home. And in some cases there may be extra rent needed or [Indiscernible] this is a case where the grantee may need to make an exception to the maximum award amounts of the person with mobility impairment needing to elevate home having access to the home still.

I am going to hand it back over to Bonnie and Jen. They will go over some additional CDBG-MIT mitigation requirements.

Thank you, Celia. As stated in the August 30 register notice, the grantee's proposed mitigation programs and projects must prioritize the protection of low and moderate-income individuals. They must describe in the action plans how they will prioritize programs and projects that will protect low income persons in order to meet the overall benefit requirement.

Some recommendations to meet this requirement are a grantee should describe in their CDBG-MIT action plan how it will meet the overall benefit requirement that is at least 50% of the funds that must benefit LMI persons. Illustrated by indicating the action plan how a grantee prioritize programs that benefit LMI persons . Additionally under the CDBG-MIT notice all grantees that seek to compel the award funds must publish on their website the eligibility requirements for such funding. All criteria to be used by the grantee in its selection of application for funding, and the timeframe for consideration of application. The grantee must also maintain documentation to demonstrate that each funded and unfunded application review and acted upon the grantee in accordance with the publishing eligibility requirements and funding criteria.

HUD recommends all grantees include in the action plan a description of eligibility requirements, threshold factors and all criteria used to select applications for funding including the relative importance of each of those criteria. Another example would be how we stay grantee can select a program or project that prioritizes the protection of LMI personal poor program or project that does not prioritize the protection of COVID-19 persons. This can be accomplished by applying a selection

criteria or threshold factor and the greater importance of activity that benefits or protects LMI persons.

It is important to remember that any selection criteria utilized by the grantee must be included in its action plan. Now I am going to hand the presentation over to Jen Carpenter to discuss some additional CDBG-MIT Federal Register notice requirements.

Thank you, Bonnie. This is the last requirement that we will focus on today. This one specifically is about housing. I will be there requirement then we will focus on the recommendation. Additionally if the grantee's programs or projects will increase the resiliency of house, the grantee must describe how the programs or projects will do so housing that typically serves vulnerable populations. Including the following housing. Transitional housing, permanent supportive housing, permanent housing serving individuals and families, including subpopulations that are homeless and at risk of homelessness, public housing developments. An additional requirements around housing, is in the notice after the second paragraph. Of those who have the notice summarized. We want to put it here because it is specific to housing. Additional requirement on a separate paragraph. It is on the same page in your notice. Will promote more resilient affordable housing and will respond to natural hazards related impacts.

The only way to get to this requirement. and one of the only ways we could think is really first this is for folks who are going to be pursuing making housing more resilient. They have identified that in the action plan. And then you want to go a step further and identify which housing units typically serve vulnerable populations, which housing units considered affordable housing. Once you have identified those units, those types of housing in your action, and whether you will make those more resilient you can talk about how. How you are going to do it. And where you are going to do the housing units. Either identified through affordable housing, or through housing that has serving of populations vulnerable. Usually HUD defines affordable housing, did dwelling units, as F housing unit were the households can obtain it. Or 30% or less of their income. So if the household house to pay over 30% of income, for the housing then the housing costs burden. The housing would not be considered affordable. Something to consider when thinking about these terms. And using them in your action plan.

Another tip before we move on to examples. Something we want to recommend as a best practice grantees may want to analyze and identify the overlap between natural hazards and minority or low-income communities through narrative, data tables and maps. This will help a grantee assess how CDBG-MIT funds can be used with affordable housing and respond to natural related impacts. That is another way to get to that additional requirement.

So we have some examples. They are pretty standard for grantees. And in the world of mitigation. If you have housing structures that are at risk to flooding, you may want to -- you identified housing serving vulnerable populations. Something you may want to target for your program. There are different things you can do in this case we are talking about having a [Indiscernible]. And a lot of those cases you are buying out or buying a landlord, but not a person in the unit. It just depends on the type of housing that you are buying gal. And eligible. You can do it. And then you would help the person in the unit who might be renting the unit or living there. And generally they would be eligible for URA. So that is something you want to think about. You can start up your program to provide different incentives. Option of relocation. Helping those folks to relocate. All of those things can be a part of a buyout program. And it should be to make a successful.

The second example is public housing. In this case a grantee has identified public housing in an area at risk of experiencing damage from future disasters. Whether a floodplain or near environmental hazards, or perhaps near hazardous materials. facilities, or in any of these cases this can be exacerbated by future disaster. We want to negate those risks. To do that you might want to think about elevating or otherwise protecting that public housing. And also the utilities.

Maybe that is something you can do depending your funding level or the cost of those resiliency measures. Sometimes that is something you can do to protect those units by elevating utilities, so they are protected. In the event of the future disaster.

Now I will turn it over and we will summarize everything we have focused on today.

Thank you. I want to quickly walk through some things that were presented today. By Jan, Bonnie, Celia and Seth. First we talked about minimizing displacement and certainly engaging in mitigation activities where you are abiding. Leveraging URA to potentially address those issues. Whether it be limited with [Indiscernible] proficiency of persons with disabilities and applying accessibility standards to address it. We have information on award amounts and including requirements in your CDBG action plan. Any requirements that need to be consistently and openly addressed within mitigation action plan. And in particular discussion about ways in which the prioritize Asian of thresholds and factors. [Indiscernible] to benefit LMI persons who may have disabilities again within your action plan.

Jan talked about resilient housing and making it affordable and aligning that with the natural hazard related impacts and addressing those. Discussion about identifying affordable housing. And making sure your resiliency measures are designed to address

current and future risk. We also talked about the community lifelines.

She spoke about the mitigation needs assessment and aligning it with mitigation plans. We had conversation about the ADA. Our fair housing and equal opportunity SME talking about disabilities. And certainly looking at not engaging and prohibited practices or discrimination. And then making sure that we are properly incorporating into the mitigation action plan efforts to protect or support protected classes.

We had discussion about the demographic analysis. And leveraging fat. Using that as well. And then looking at the impact of natural hazards on those and again supporting the natural hazards making sure that the mitigation efforts and strategy incorporated with addressing natural hazards. We also talked about the value of citizen participation efforts. Making sure that if there is a situation where you have renters for impacted [Indiscernible] incorporating assistance to E.R.A. support that. And Jan talked about potential projects where for example you may have an elevation of a public housing unit that needs to be incorporated into your CDBG action plan. With that I want to talk about aligning the fair housing equal opportunity goals with the action plans, and particularly the CDBG-MIT goals. Bonnie talked about the four goals. Supporting data and investments and focusing on property and infrastructure. Grantees certainly required to assess those characteristics and the impacts of future hazards as Bonnie spoke of. We have building capacity to comprehensively analyze risk and aligning that with mitigation plans. Again Bonnie spoke to the hazard mitigation plan and how it is incorporated into the needs assessment. We talked about in terms of bullet number 3, looking at open policies at a local and regional level. And having lasting impact on risk reduction. Impact lifelines and certainly disaster caused. So aligning long-term resilient strategy with [Indiscernible] by your protected classes. That will help yield that type of important result.

We have goal number 4. And then that goal is to maximize any impact of funds by encouraging private and public partnerships and coordinating with other federal dollars. And again leveraging public and private hardships is key to maximizing the impact of your available mitigation funds. With that -- I would like to generically ask a couple of quick questions that I think came up today.

The first question. Any general advice for helping people with disabilities if they are subject to a buyout program?

Do either of you guys have any [Indiscernible] we have some background noise. I think the person asking the question clarified it is a voluntary buyout and so the person would be opting to sell their home. And moved to a new location. I do

not know if you have any advice for this grantee. If not we can also follow-up with them after the webinar.

Yes, this is Celia. I can answer for my fair housing perspective, but I am also curious to hear Jen and her perspective whether the CDBG mitigation funds can be used to help these persons with disabilities. The one thing that comes to mind a person with this abilities like we talked about, will have special considerations when trying to relocate. They need accessible housing for example to meet the disabilities that they have. They might need to be close to certain service providers within the community that provide them with support. whether medical providers or social work. Or other providers. They may want to be in an area where those providers are still accessible. I would really encourage grantees to work with these persons with disabilities, and maybe to help them identify housing that would meet their needs, and refer over to my colleagues about whether the CDBG funds can be used to do or pay for things like maybe helping find the housing to relocate. They may need additional funds to make that housing accessible to their needs. Things like that. Those are the things that come to mind. And with helping a person with disabilities to relocate.

Thank you, Celia. As a part of any buyout program you want to build this into your program. And you want to think about exactly the things that were talked about with Celia and help those folks relocate. It is certainly eligible for all those things. We talked about housing incentives, both in our CDBG grants, and mitigation grants. And you can include those housing incentives and think about some of these things, so you are making sure not only that the folks are going to safe housing, and after the buyout. But also to help them decide to agree to the buyout the first place. So they might need additional considerations. And additional funds. It is something you want to think about in any program design that you have for a buyout.

Okay. With that I will move on to another question. We have a question regarding references. Information to provide clarification on the crosscutting requirements related to today's seminar. And so we do have a reference on the next page. I will point to it when we get to it. It is the fair housing equal opportunity staff providing us. They provide information on some potential crosscutting requirements.

The next question. Can you give us a good example of CDBG-MIT activities that are eligible for a sub recipient? I will take a quick attempt to answer that. When you look at the slide here and you look at the bubbles. These are some examples of potential activities related to mitigation planning that potentially could be considered. For example community development and lead use planning, [Indiscernible] building codes and infrastructure planning could also be some planning related

activities that potentially could be eligible under the CDBG-MIT . Can you amplify, Jen?

Yes those are all good examples. Planning and sub recipients usually rethink about them when working with maybe a specific housing program. Or some other kind of specific program, but it certainly could work depending on the skill set of the sub recipient past sub recipient. There is a language but it is escaping me now but I will include at the end. Potential planning activities for both CDBG applicable to the CDBG-MIT grantees and all things they are allowed to fund under that. There is a lot of encouragement in our CDBG-MIT notice to specifically -- FEMA mitigation side focusing and trying to align projects and projects and programs with FEMA as well.

Okay, thank you. It looks like one of the last questions is related to if working with persons needing to be moved or relocated, who would be the best person to speak with within the city? The office of disabilities or the mayor. Do you want to start with an answer to that, Celia or Seth?

Hello, this is Celia. It probably will depend on the locality that you are in. But looking for contact of groups with community-based groups that represent persons with disabilities. That would be a good place to start.

Okay. Seth, do you have any additional information?

That would be mine as well. Okay. It is interesting to think of local governments and an office that represents disabilities within local governments.

It may be difficult to determine those between localities, so starting with a particular group. Starting with nonprofits. Whether housing [Indiscernible]. And they may be able to dress if not they can lead to some.

Okay, thank you. I'm going to weekly walk through some resources. The first three bullets related to the CDBG-MIT program. The second bullet is referencing the notice that was a part of the presentation for today. It was published last August. So definitely some great information with the CDBG-MIT program. We also have a 2019 webinar series. It started last fall. There is a lot of great crosscutting webinar topics addressed in that series. Celia and Seth provided us with the link. There was a question related to it. Fair housing and equal opportunity. We encourage you to take a look at the link for more for Tatian desk information. Crosscutting requirements for fair housing.

If you have additional questions that we were unable to answer today, or in the future if you have questions that you might want to pose as you are looking to develop your CDBG-MIT action plan, we encourage you to take a look at this email

address. D RSI policy unit@HUD.gov. With that, Jen, Seth, Celia, any final comments or things that you would like to share with the group before we and today's webinar?

This is Jen. I do not have anything other than to say feel free to send us an email with any questions that -- thank you for attending today.

One last question. Yes, again we will record this webinar. The recorded webinar and today's slides, [No audio] [Captioner reconnecting]

[Event Concluded]