

NDRC NOFA Q&A Session: FAQs Walkthrough

Thursday, February 12, 2015

3:00-4:30pm EST

George Martin: Good afternoon everyone, my name is George Martin. I work for TDA Consulting. We are one of HUD's technical assistance providers. And I want to welcome you to today's NDRC NOFA webinar. It is a FAQ walk through and Q&A. I will be providing technical assistance for today's webinar. So in just a few minutes, I will turn it over to our wonderful HUD presenters. But before that, I am going to spend a few minutes going through some technical instructions.

I want to start by reminding everyone that you should give your undivided attention to our presenters today. So please turn off your cell phones, close your email and other programs on your computer, and give you undivided attention to the webinar. If you are having some technical issues, you can reach out to me or one of my colleagues to get assistance. If you want to talk to someone on the phone, obviously, I am talking to you now. So you will need to call my colleague, Vicky Grim. And you can reach her at (443) 875-8477. And if you were able to access the WebEx webinar, but you are still having trouble with something, you can send a chat message to the host. There is a chat panel on the right hand side of your screen. If you select host and send the message that will come to me and I will do my best to help you solve your issue.

So everyone has been muted on today's call. And that does not mean that you will not be able to ask questions though. We definitely want to hear your questions today. You will be able to ask questions in two ways, either written questions or verbally over the conference call. To ask written questions, you can do that throughout the presentation. We are going to have a short presentation at the beginning before we start the Q&A session. And you can ask questions using the Q&A tool whenever you would like. To do that, you are going to look at the right hand side of your screen. There is another panel that says Q&A. You want to make sure that panel is open. You might have to click the little triangle next to the name to open it up. But then all you need to do is type your question into the field, then it asks you would you would like to send the question to. If you would like to ask the questions to all panelists, please select that, and then press send. Then we will get the question and we will be able to answer it for you.

You can also ask questions over the phone. It is a little bit more complex. The way that you can figure out whether you can ask a question over the phone is to look at your name on the participant's panel on the right hand side of the screen. And you should look to the left of your name and see if there is a little telephone icon. On the slide on the screen, you can see there is someone named Kathy Kaminsky. She has a little telephone icon next to her name. That means when she is ready to ask a verbal question. However, most of you probably do not have that next to your name. If you want to ask a verbal question, what you need to do is click on the – there is a tab on the top of your screen called Event Info. If you click on that tab, there is a number called the identity code. And if you type that code including the pound symbols into your telephone keypad, then you should see that little telephone icon next to your name on the WebEx. And then you are ready to ask a verbal question. So once you have done that and you see the telephone next to your name, you can indicate that you would like to ask a question over the phone simply by pressing the

little hand icon at the bottom of the participants' panel. You can see it. There is an image of it on the screen right here. Then we will know that you are ready to ask a question. And we will unmute you.

Just a few notes on questions, we are going to answer all questions verbally, even if you sent in a written question. We are probably just going to answer that question aloud over the phone. So if you would like a written response, please indicate that and we will followup with you after the webinar. We may not be able to answer all questions depending on how many come in. And we will try to answer the questions that are most common first. So if you have a question that is very specific to your situation, we might not be able to get to that. And as always, as you probably know, anything that you do not want to share on this webinar, it is a private question, or anything you think of afterwards, you can always email resilientrecovery@hud.gov. Send your questions there and HUD staff will get back to you very quickly. On that note, I am going to turn the presentation over to Jessie Handforth Kome at HUD.

Jessie Handforth Kome: Hello everybody, this is Jessie Handforth Kome, Deputy Director of the Office of Block Grant Assistance at HUD. And I am here with Todd Richardson whose title I always forget.

Todd Richardson: I am with the research office, PD&R.

Jessie Handforth Kome: He is Policy Development and Research, but he has one of those long titles. And Lynsey Johnson and I believe Lynsey is going to walk us through the first few slides. And then we will talk about a few things. And then we are going to move on to taking questions and trying to answer them right away or take them down and try to get back to you fairly quickly. We have some more people signed up for this webinar than I have seen in any of our webinars up until now. So we will try to stay as long as we can to handle any questions you may have. Lynsey, do you want to take it away?

Lynsey Johnson: Sounds great, thanks Jessie. So the first couple slides here – oh, one of the other things I want to point out really quick. We are also going to go over some where you can find the resources on the NDRC HUD Exchange website. So we will go over that. And I will screen share shortly through this presentation.

So a little bit about the competition and I am sure at this point you all are intimately aware of the NDRC process and what we are trying to accomplish through this conversation. So I will not belabor that point. We are getting towards the end of Phase 1 now on the infographic here. I know we have a lot of questions with how to submit. And we will go through probably those questions later through the webinar.

Yesterday, I believe, we ended up releasing the most impacted and distressed, unmet recovery needschecklist. So I am going to show you where that is on the NDRC website.

Jessie Handforth Kome: Lynsey, some very alert people got to us. And there was a formatting error in that. So about 15 minutes ago, we re-released the correct version for those of you who wants the version that is actually accurate. Sorry about that.

Lynsey Johnson: Oh, that is okay. That is okay. And then we actually did an update of the FAQs January 29. So I am just again point out to you on the website where you can find the most up-to-date FAQs.

One of the things that we have done here and this list is not exhaustive by any means. But we have gone through and categorized the FAQs as they have come in. If you see on the slides here, for instance, general NOFA questions about the competition are identified in the parentheses and then we have listed back.

One of the things I want to make sure that I point out is that these slides will be made available and archived on the NDRC webinar website in the next couple days. So you will be able to go and look at these FAQs in this specific slide. If you have any questions, I know we always get questions about whether the slides will be archived. And so with that, I am going to – well here is another set of topics to which the FAQs are sorted by. And with that, I am going to turn it over to Jessie to talk a little more specifically about FAQ number 159.

Jessie Handforth Kome: Hi all. If you have not taken a look at the FAQs yet, I strongly recommend that you take a look at 159. It is probably the most frequently asked question in the mailbox. And we had answered it differently initially back in question 35. And 159 is a significant change to the prior response.

So this is about meeting the unmet recovery need threshold with using a project that has been a repair project that is complete and that you just did the repairs to put it back to essentially a predisasterous stable condition, but you did not address or take the resilience enhancing actions like elevation of a damaged facility. And we got asked could the resilience action be considered a funding shortfall and unmet recovery need. We included what we thought was the best request which was someone who noted that the costs themselves were eligible costs of rebuilding according to the NOFA. Someone went and dug into Appendix A, which is quoted here on the slide.

Then, there was a secondary question that came in actually from a different questioner asking whether the costs of resilience only projects, but did not involve any repair or rebuilding for disaster damage, whether that could be used for meeting the threshold. And we answered that question as well. So Lynsey, can you jump me forward to the answer?

All right, it is in tiny little print. But you can read it in answer 159 on the FAQs yourself by going to the hudexchange.info and looking it up on the disaster resilience site. But basically, what we said was to the first question: yes, if you completed repairs of a structure or stabilized a streambed, for example, that was damaged by a fall by disaster and put it back to a basic functional, stable, or pre-disaster condition. But you are able, using the documentation that is required in Appendix G, to demonstrate that there are resilient measures. You know the cost of them and they were not implemented. You got to show us the nature in cost that could have been incorporated into the repairs. We will consider the demonstrated costs of the resilient measures related to the damage to be unmet needs for the purposes of meeting the unmet recovery need threshold.

The questions that came in mostly involved questions such as we have repaired the house, but it is in a flood plain and we were not able to elevate. Would the cost of elevation be admissible because they would have been an eligible rebuilding cost center at NOFA? So that is the sort of thing that we are saying. And we gave examples of houses in a flood plain that were not elevated. And we gave an example, which was also one of the incoming questions of a damaged sewage treatment plant was repaired and got back online. But they did not take the resilience measures during the rebuilding project in that case because the costs were more than they had money for.

The response for the second question for the pure resilience projects were not affected by this reconsideration. We are still saying that that would not work for the unmet recovery need threshold. In Phase 2, if you have demonstrated unmet recovery need housing damage and you do not want to rebuild the houses, you want to propose doing something that would protect the flood plain that they were in or make it more resilient some other way that would be an eligible project. But it is not an unmet recovery need in the sense that the NDRC describes it as being related to rebuilding or repairs from damage. And we just said that resilient repairs are eligible. And we would consider that the answer, the total cost of that could be counted for unmet recovery need for resilient repair.

So you have got to, at this point, start really tearing apart what we need for just the technical threshold on fund out because it is just essentially a fund allocation question. So we can compare apples to apples across grantees from what is an eligible project. And it will look like once you figure out tieback for your idea. We would be happy to take more questions. As I said, we included examples related to the questions that we got out in the answer to 159. So it is one of the longer ones in there.

This brings the policy for the National Disaster Resilience Competition completely in line with the regular CDBG-DR allocation process and grant. So that was one of the reasons behind why we wanted to do it. All right, Lynsey. What else? What do you got next?

Lynsey Johnson: Application format.

Jessie Handforth Kome: The other FAQs, items and notes, we are getting a lot of questions about application format. We do want all pages numbered. We do want you to keep to the page limits where the NOFA says there are page limits. Make sure you count pages. If you have multiple target areas, you get three extra pages that you can put anywhere for multiple target areas to handle the additional complexity of that. Refer to Section Four of the NOFA.

We did not put the link in for the standard forms, woops. That still says question mark, question mark. We will fix that before we publish these slides. The standard forms are actually linked off the general section, I believe, and not off of our NOFA. There is something wrong with the link in the NOFA itself. It is not working for me at all. Okay what is the next one?

Oh, 424, again, use the form found at the grants.gov link to the competition. And we will show you what that slide looks like. It looks complicated like that for your grant application package. And there is a 424 link off of that slide – off of that page. Make sure you fill out all your boxes that you need to fill out. Check and fill it in. The best way to do this, I have found, is to just get a ruler and go line by line. Because by the time you fill this out, you might be a little tired. And you do not want to mix this up. Make sure you check the “I agree” box on item number 21. That way, you are going to be complying with your certification in Appendix F. And so it is not quite the same as Formula CDBG. We are getting this question a fair amount. In formula CDBG, you sign the bottom of your certification. Here, you attach the certification to your 424 and click the “I agree” box. And then the signature on the 424 by your authorized representative is going to take care of signing both the 424 and the certification.

Citizen participation, oh look. It says check with Jessie. I am not sure she approved my answer on this one. You can tell we are really flying fast at this. The opportunity for public comment, Lynsey has got her head in her hands. This is your actual notice to the public of your Phase 1 application. The reason we are getting questions on this is because we granted the waiver for citizen

participation in the NOFA proper. And it has a list of items to be included when you go out to your citizens and publish. We repeated the waiver in Appendix A. And it has one additional item on its list. You may follow either set of directions and be correct for this. You could publish all the ones in the NOFA proper, which is what I think most people are doing from what I can see. There are a few people that are already out; applicants are out to the public on it. Or you can have read deep into Appendix A and have published with the slightly longer list. Either way is correct. Do not panic. You are fine. Follow one or the other. We are not going to ding you for this. This one is on me. When I accept all comments and markup, I should really check and make sure that there are not glitches. On the formatting for public comment is up to you. You are trying to communicate with your citizens. We certainly do not insist that you show citizens exhibit, exhibit, and exhibit. You can send the information to them however; you need to send it to them. And the list of what is included I just went over. It is stated in the NOFA.

Lynsey Johnson: All right, everyone. What I am going to do really quickly is share the screen with you so that you guys can see where this MID-URN is. And I will let Jessie talk a little more about it if she wants to and I will do the demonstration simultaneously.

So everyone, this is the HUD Exchange NDRC website. So if you have been following where we have been posting the most recent FAQs, that link is right here. You click on it. Like I said earlier, the most recent FAQs are dated January 29, 2015. I know I saw that question come through the Q&A already. So that is the most up-to-date FAQ right now.

And then if you scroll down to the most impacted distress unmet recovery need checklist for it. This link has also been updated this afternoon to make sure that we have Checklist B corrected. So just click open on it.

Jessie Handforth Kome: HUD website is deeply suspicious of everything. So it has got to look at it while we are opening it. And you can see that opening. Basically, what we are trying to do with the checklist and it has been pretty much confirmed from the people that are in the Makeup Academy in New York and doing the training the trainers there. That we were trying to cover 80 – 90 percent of the issues that we saw in the 45-day reviews could have been dealt with by just being completed. So about getting every single thing that we asked for there.

If you follow the checklist for each target area and it is going to be required that you follow the checklist for each target area that you submit, then we will have a really quick visual and so will you. Making sure that what you submit is complete. And that we know what data to look for. And you know what data to include. And we can find everything, all the links, everything that you want us to see. So Lynsey has got it up on the screen now. Let us know we are looking at Lynsey.

Lynsey Johnson: Yep. So we are, right now, looking at Checklist A right here. And if you can do this, please refer to the instructions when going through this. And try to separate this out and keep it really clear as to what should be filled out for each type of checklist. So Checklist A is for target areas that have the most impact distressed areas previously identified for HUD. Checklist B applies to target areas that are the sub county area that you are asking for it to be identified in both impacted and distressed. So please make sure you notice the huge differences between Checklist A and Checklist B. And then moving on to step two for each target area, make sure that you complete the appropriate section whether you are falling into the category of Checklist A or Checklist B. So like I said, it is meant to be clearly separated based on your jurisdictional needs.

Jessie Handforth Kome: And when we add this to the NOFA, it is not going to be subject to page limits.

Lynsey Johnson: One of the other things that I want to make sure that I point out with the checklist is that if you look on the right. It is under data documentation. That is really meant for you to identify and check yourselves in listing all the page numbers where we can find this information. And also, if you are providing that information through a link, making sure that that link is correct. That is going to help speed the review process along. So the more information you give through the data documentation box is going to make the reviews go that much more smoothly.

Jessie Handforth Kome: All of the text in the criteria in a data source is essentially, virtually identical with Appendix G. It is just broken out into convenient, easily digestible chunks. So you can tell what goes with what.

Lynsey Johnson: So with that, we will move on to the next part here. And I just want to make sure that you guys all have the links again for all of the NDRC resources, back sheet, anything posted to grants.gov, infographics, all of that is listed here on this slide. Again, which will be made available in a few days and posted to the webinar series website archives with posted transcript of the actual recording and the actual slide.

So with that, we are going to turn this over to questions. We are going to start answering the chat questions first and then turn it over to the phones. So with that, we will begin. The first question, we answered already. The January 29 FAQs are the most recent.

Next question reads Appendix B says the partner letter may only be a letter of intent unless the application includes implementation of activities. What does implementation include? Webinar answer or followup in writing is okay at a later date.

Jessie Handforth Kome: Yeah, I mean the only implementation of activity that could possibly really have happened at Phase 1 would have been some kind of – probably linked off to your leverage, some implementation of a major study or possibly implementation of something that a philanthropy funded that was actually involving rehab. But we did not really anticipate it. Our lawyers wanted us to include that. I think in every case that I have heard of, you are not really implementing any activities beyond the ones that we allowed for the pre-awards waiver for and you really just really partner letters. If you want to give me more specifics at resilientrecovery@hud.gov, I can answer your specific case. But up until now, I have not heard anything that would not just be covered by a partner letter for Phase 1.

Lynsey Johnson: All right, next question. I have been on the voucher grant website for HUD.

Jessie Handforth Kome: No, this one is not related to us.

Lynsey Johnson: Okay, fair enough. Next question, what kind of edit could be made to the application after it has been published for public comment before it is uploaded to grants.gov. The 15-day comment period is a significant limitation for the application deadline.

Jessie Handforth Kome: You can make the edits that you need to make, but you are going to need to – if you do something that is not in response to a citizen comment or something that is raised during a hearing or through another channel from your stakeholders. We try to encourage you

to limit those kinds of changes. We really want you to go to citizens with the key points that they need to know.

The interesting thing about this is that for Phase 1, the main thing that citizens are going to want to know is what are the target areas that you selected. And is your idea or concept likely to affect them at some point. Once you get to Phase 2 and you actually have specific projects, it is a lot clearer. Because changing from one project to another, changing beneficiaries or massive scoping changes, those are problems after citizen participation unless they are in response to a citizen comment. Phase 1, I mean if you completely change your idea, I mean that would be a problem. I mean if you are tweaking it that is fine. You are going to be having some discussions back and forth with your citizens during that time period. We understand that.

Lynsey Johnson: The next question, if we want to submit threshold data for two counties, what happens if HUD decides one county missed the threshold and the other does not? Does this disqualify the whole application? Or can it be only – or tell you that Phase 2 can only be for one county?

Jessie Handforth Kome: It actually does neither. If you submit threshold data for two target areas and we only accept the threshold data for one, we will review the second area as if it was your greater area and not your target area for grant expenditure. We will review the application. You only need to get one through to get us to review the application. Anything that we do not accept for threshold, we will consider as your leverage to a larger area. And if you get invited to Phase 2 and you want to adjust or update your data and try to add areas, you can do that too. This is very iterative as the NOFA does this at several places. So never fear, you are really trying to get one through in Phase 1.

Lynsey Johnson: Okay. The next question might be for Todd. Appendix G does not state a dollar amount for unmet needs for housing. What is the threshold for resilient repairs for housing, either elevation or acquisition?

Todd Richardson: So the NOFA states for folks that do not yet have a designation for their county for most impacted and distressed, 20 homes. So it is not a dollar threshold. It is a number of units that you can show have unmet needs. So it is a unit count, not a dollar count. For grantees – so this is a question from a grantee that has....

Jessie Handforth Kome: Applicant.

Todd Richardson: Oh, an applicant, sorry. Thank you, an applicant. If this is from an applicant who is already a grantee under the regular program, the NOFA simply states that it must exceed the existing CDBG-DR funds available.

Lynsey Johnson: All right, next question, a question for FAQ 159 and housing unmet recovery need. If you did not run a housing program and are showing unmet recovery needs with a windshield survey, can you count a home that was standing and repaired, but not elevated because the resident indicated that they did not have enough funding to elevate?

Todd Richardson: Yes, yes. And that is, in fact, question 159. Yes, that is exactly correct.

Lynsey Johnson: Next question, is it expected that we would include a grant amount? A response says that you place—

Jessie Handforth Kome: That is all right. I got you. In the question – in the Q&As – in the FAQs, we say that you can put a placeholder in for Phase 1. There is no expectation for the grant amount. We need the 424 to be there for legal reasons, mostly because we need to get the certifications and we need to know who your authorized representative is. But for Phase 1, there are not projects. So there is not a grant amount yet. Phase 2, we will be much more serious about it and we will talk about the money.

Lynsey Johnson: Next question, FAQ question 130 is—

Jessie Handforth Kome: Yes. You cannot aggregate for most impacted or most distressed. But you may; in fact, you must for unmet recovery needs. Every area must have at least some unmet recovery need. But the threshold is set for the aggregation.

Lynsey Johnson: Next question, once the unmet recovery threshold is met, does that mean every impacted and distressed area also meets the threshold?

Jessie Handforth Kome: If you turned it around, you have to have every area meet the most impacted, every area meet the most distressed, and every area must contribute something to unmet recovery needs.

Lynsey Johnson: Next question, if we have nine counties that are target areas, does that mean that we have three additional pages for each of those counties?

Jessie Handforth Kome: This is interesting. There are nine counties or nine sub-county target areas. I do not know if – well maybe a couple of states have nine counties that are most impacted and distressed. Do we have anybody that has nine counties?

Todd Richardson: Probably some of the big guys.

Jessie Handforth Kome: In New York, yeah. Okay. Yeah, so I mean if you really do have nine most impacted and distressed HUD-declared counties that are your target areas, then – Lynsey, I need you to not – can you unhighlight it? I cannot read it.

Lynsey Johnson: I am sorry.

Jessie Handforth Kome: No – yeah, you do get three additional pages for each target area. So yeah, there we go. Three additional pages for each target area is correct for the total pages. So it would be nine times three. You have 27 additional pages. And I am going to have to make Lynsey read that application.

Lynsey Johnson: All right, next question. Do entities who met the original threshold criteria in December still need to complete and submit the MID-URN Checklist?

Jessie Handforth Kome: Yes, you must submit everything you want us to consider. The 45-day run was an optional courtesy practice run. And the rules have changed. We have put a technical

amendment out. So yes, you must submit the complete application to get through the completeness threshold.

Lynsey Johnson: All right, next question. Are there any page limits besides the two for Executive Summary and the five for Exhibit B?

Jessie Handforth Kome: I do not know. Did we put a hard two on Executive Summary? I know the Exhibit B ones are suggested. They are not mandated. It was a suggestive one. But for the Executive Summary, give me a second. I got to open my copy in NOFA and take a look at where we put all the page limits. I found the exception of page limits. That one I have bookmarked. Suggested two pages maximum for the Executive Summary, it is not a hard two pages. But you would really, really, really help me if you could hold it to two pages as much as possible. You may use the Executive Summaries to get a beat on how to make assignments of these to the right people and to brief – to tell your story.

Lynsey Johnson: Next question, is there a minimum number of brownfields that must be in a target area for it to be considered having had prior environmental distress?

Jessie Handforth Kome: I believe the answer is one. Yes, it is one.

Lynsey Johnson: All right. We have some sub county areas that have been accepted by multiple qualified disasters. Can the unmet needs for these disasters be aggregated to meet the unmet recovery need threshold?

Todd Richardson: Yes.

Lynsey Johnson: Next question, in the NOFA, under citizen participation waiver and alternative requirements, the applicant is required to publish the—

Jessie Handforth Kome: You can stop here. This is the one where the NOFA says a different list. Slide down for the rest of the question. So this is where I was telling you though, the NOFA and the – okay. So the way you are going to determine eligibility and national objectives is there is an FAQ on this in Phase 1. You are just going to mention that eligibility and national objectives are a requirement. And if you already know how you are likely to meet them, you can say that. Some places have extremely low-income areas, for example, that were hit and they know they are going low-mod. And you are going to say that you are going to certify to HUD that you are going to meet these requirements. That is what you are going to tell them.

Overall benefit is a requirement that 50 percent of every grant when you go to Phase 2 is going to meet the low-mod national objective. We want you to; again, say that overall benefit will apply unless you request a waiver. That is the minimum you need to say. But you can also talk more about how you intend to meet the overall benefit requirement or that you are going to go request a waiver. These are things that citizens can be affected by and are interested in. The schedule is purely to let them know that when you are going to submit, when you think you are going to hear back, tell them about Phase 2.

It is just a basic schedule of your project itself or your idea or concept has other local schedule issues. Put that in it. This is real high-level, tell citizens what the timeline looks like for what you

are up to. You have taken a long-term commitment or you are not coming in. So what does that timeline look like? Or you have a long-term commitment in mind.

And then the last thing is how we will address how the city will address any substantial amendment criteria. All of you are either CDBG or CDBG-DR grantees. And you have a substantial amendment process written into your citizen participation plan. If that is what you are going to use, say that. If you plan to change it after reading Appendix A and looking at the waiver, then you can say that now or give me a chance to go out in public about your substantial amendment criteria because you may not have been out to citizens with that for a long, long time. So they are interested in – once HUD accepts something and you want to change it, what are your criteria?

Lynsey Johnson: All right, the next question is for most impacted under economic revitalization, can the percentage of the employment loss six to twelve months after the said disaster, one percent point or greater local unemployment rate in the impacted area come from the county level data and be distributed to the tract?

Todd Richardson: The answer to that is no. If you see question 161 on the FAQs, we speak to that with the previous question that we had on quarterly work force indicator data. And the data needs to come from the sub county – from a sub county geography for your target area.

Lynsey Johnson: Okay, next question. Can you define a windshield survey for us? Does multiple site visits as a part of programmatic staff count as one?

Todd Richardson: I am not sure. This is Todd again. I am not sure what multiple site visits as a programmatic staff count – and I am not quite sure what that means. If it means that you have visited a number of businesses and you have seen with those visits that those businesses have continuing unmet recovery needs, then you could use that information. You need to write that down and explain exactly where that information is coming from when you made those visits and how you are documenting this as a continuing unmet recovery need.

Lynsey Johnson: Will a chart depicting partners or stakeholders be an acceptable attachment?

Jessie Handforth Kome: I believe that where we talk about the attachments for Attachment E, they are like maps and drawings rendering, showing us relationship things in a graphical format. We had said that we would not count this against page limits provided there is no narrative text or data tables. But if you want to include labels and legends. So I would say that probably, if you made not a data table of your stakeholders, but showed us some kind of graphical representation of their relationship to you, then that would work. But remember that you also have the consultation checklist where you are going to be giving us a lot of information. It is up to you if you found a graphical way that you think shows us better or shows us something that would help us understand your idea or concept.

Lynsey Johnson: All right, the next question. We are using a tribal area as the target area. Several villages within the tribal area were impacted by eligible disasters. Can we qualify one village as most impacted, another as most distressed, and then aggregate on that recovery need across the targeted tribal area?

Jessie Handforth Kome: You said the tribal areas count as sub county areas. So it would be a single sub county area.

Todd Richardson: But you would need to be saying that the most impacted is the whole tribal area. The most – you cannot sort of say this part of the tribe—If you have a village that is most impacted, meets the most impacted definition, that village needs to be included as part of the calculation for most distressed for on that recovery.

Jessie Handforth Kome: Yeah, it has got to be the same geography for most impacted and most distressed and under recovery needs. Each area that is most impacted and most distressed has to contribute so probably no for that answer. If you want to send it in with more detail to resilientrecovery@hud.gov, we will look at it. But it will probably still be no. We need more specifics. I mean are these villages attached to each other?

Lynsey Johnson: And actually, that might go to the second question. We have multiple tribes within a tribal area. Must we meet mid and earned individually for individual tribes? Or can we aggregate MID and URN for the tribal area?

Todd Richardson: You have multiple tribes within a single tribal area. So if it was a single tribal area, you can qualify that full tribal area in itself. I think what we need you to send is more detail about this question so we can actually be able to answer it clearly.

Jessie Handforth Kome: Because we are not answering based on tribes or based on geography. The geography has to remain most impacted. The geography has to be most distressed. The geography has to have unmet recovery needs. So what is the geography?

Lynsey Johnson: And that might go to this next question. If we are looking at the geographic perspective larger than the minimum required geography, please define minimum required geography.

Jessie Handforth Kome: All right. So there are two kinds of geography really in place throughout the competition. One is the target area for grant expenditure, which is the area with unmet recovery needs that you are going to do something in Phase 2 that is going to be addressing that unmet recovery need. Now we do, because of the nature of disasters, have a few situations where maybe you will not actually be expending the money. You will have to go upstream, for example, to deal with flooding problems.

But for the most part, the target area for grant expenditure is going to be the geography with unmet recovery needs for the benefit of which you are going to expend your grant fund. Your total proposal target area that goes beyond this if you want to call it minimum required geography, that basic target area for grant expenditure. But your total proposal target area is going to include the entire area, the entire geography that is positively affected by your leverage and long-term commitment on top of what we can pay for, what is eligible – with the funds coming from this appropriation.

We tried to say it as clearly as we could in the NOFA and narrow down Appendix G to make it a little bit more clear. So there is a target area for grant expenditure. And then there is your overall proposal target area for resilience.

Lynsey Johnson: All right, the next question. Does a Rebuild By Design project that was not fully funded qualify as an unmet recovery need for resiliency if it fits within our target areas? If yes, what would need to be done to demonstrate threshold?

Jessie Handforth Kome: This is a case where you have to look at question 159 again because we were specifically answering a question. It was said by the questioner that it was a Rebuild By Design question. But I believe that it was in the second question.

You have unmet recovery needs that are related to repairs. And resilient repairs are okay – damage that was caused by the disaster or negative effects of the disaster. And then you have the possibility of a resilient response elsewhere or in some other way to the unmet recovery need from the disaster. Some of the rebuild by design projects are an example of the second thing where they are a resilient response in some different location or beyond the – some of them are just purely resilient. So they are more of a response to an unmet recovery need and not the unmet recovery need itself.

Now one or two of the Rebuild By Design projects are straight up really talking about resilient repairs or addressing unmet recovery needs. So you are going to have to look careful at question 159. Look carefully at the project. But you cannot just take a Rebuild By Design project, the unfunded portion, and say that that is the unmet recovery need. It is not related to the allocation need to impact. It is the response to the impact.

Lynsey Johnson: All right, next question. Do we have to survey the houses for unmet recovery need if we are documenting that they have unmet resilience need and can document that they were damaged in the disaster?

Todd Richardson: I am going to put you all on hold for a second while Jessie and I discuss this question for a second. [extended pause]. So the answer to this is no. You still need to actually document that they did not have enough money or do not have enough money to elevate or to do the resilience that needs to be done for those properties.

Jessie Handforth Kome: So stated the other way, say you need to – you still need to go see that the properties exist, and that's the windshield part of it. And you still need to ensure that you know that you documented that there is not enough money to do the elevation. So that is the – the instructions in Appendix G still apply, right?

Todd Richardson: Yeah, this is still sort of unmet because there were not enough resources, not because you chose not to do it.

Lynsey Johnson: All right, next question. Do I understand correctly that we can add partners in Phase 2 and also drop a partner who was part of Phase 1 but decided not to participate as long as we did not drop all partners?

Jessie Handforth Kome: You could actually drop all partners although it would be a very risky adventure to do that. You are going to get scored on capacity. And it is a slightly higher number percentage of the points in Phase 1. If you restructure going to Phase 2, that is certainly possible. We are very into iterative thinking here. But you need to pay special attention to making sure we understand that you still have capacity. And adding partners is not a problem.

Lynsey Johnson: All right, next question. Do insufficient disaster funds from FEMA qualify to demonstrate unmet need for such things as not fully funding elevation costs?

Todd Richardson: Well FEMA is one of many sources for funding recovery. So if this is a housing related question, it is a survey that you would need to have folks say I did not get enough from my insurance company, from FEMA, or from whatever other source and I did not have enough money to do it. That would be the mechanism appearing to show that you do not have enough for elevation costs, for example.

Lynsey Johnson: Next question, beyond the partner letters, would submissions of letter of support be help for the Phase 1 application?

Jessie Handforth Kome: If you submit letters of support, I will count them inside your page limit. Please do not submit letters of support. NOFA said that, by the way.

Lynsey Johnson: Next question, since FEMA project worksheets are permitted to demonstrate infrastructure unmet needs, do we need to provide the complete worksheets? We have 258 and are using three as examples. These are large worksheets and probably 70 plus pages each.

Jessie Handforth Kome: We are pretty aware at this point; of how long these are since we did get quite a few of them on the 45-day reviews. I do not know enough about the structure of FEMA project worksheets to say that there are any particular pages you can leave out. We thumbed through all the ones that we got and used them. If they have a summary built inside them anywhere in addition to the signature pages of stuff, maybe. But send that into the mailbox and we will have to go talk to our friends at FEMA. But right now, you are submitting a file. So can provide it in a drop box if grants.gov can't handle the file size. There are no page limits on data backup.

Lynsey Johnson: All right, that was the last of the text questions. George, do you want to go over the instructions again for asking verbal questions over the phone?

George Martin: Yes, sorry. I was just talking on mute. So no one has indicated that they would like to ask a question verbally. But if you would, you can click the little hand button at the bottom of the participant panel. And then we will unmute you or let you know when we are ready for you and you can unmute yourself. So it looks like we do have a verbal question from Anne. Anne, do you want to press star six on your phone? That will unmute you.

Anne: Hello, can you hear me?

Lynsey Johnson: Yeah, Hi Anne.

George Martin: Yes, we can.

Anne: Hi Jessie. Hi everyone. George, just a quick question.

Jessie Handforth Kome: Anne, I want to tell you that right now – I counted just before I came into this webinar. And you are ahead on the number of questions.

Anne: Are we still friends?

Jessie Handforth Kome: We are still friends.

Anne: Just kidding, sorry. We are trying to make any assumptions. So we are asking a lot of questions. But hopefully, this will be just an easy kill. Another assumption is that we are not going to include the questions in our application because of the page number limit. We are just going to label our provider answers with the numbers of the questions provided as a reference. Is that okay to leave the questions out?

Jessie Handforth Kome: Yeah, that would be cool.

Anne: Okay.

Jessie Handforth Kome: So what is your question now? Do you have another question now? I am seeing a whole bunch of them suddenly come into the chat box.

Anne: I actually – I think one of my team members submitted the – we submitted the questions on the tribal areas. So I am going to put that in email for you with a little bit more description. So I think that is all I have got. Thank you.

Jessie Handforth Kome: Okay. That is great. Thanks, Anne. And Missouri is out there trying to think up extra questions. I know they are because they are the ones trying to catch up to you. Okay. What do we have?

Lynsey Johnson: Okay, yeah. Okay. We will do the text questions that have come in. And then we will open the phones up again. Next question, if a county took out a loan for infrastructure repair, can the loan amount be an unmet need?

Jessie Handforth Kome: One moment, please.

Todd Richardson: No.

Jessie Handforth Kome: Loans and grants are both ways of getting the money you need to do things. We do not differentiate as a matter of direction of the Stafford Act.

Todd Richardson: So, for example, another often thing is people got an SBA loan to repair. That is no longer an unmet need. You have got an SBA loan on your repairs.

Jessie Handforth Kome: All right, next question. Does damage to a public building count as damage to permanent infrastructure?

Jessie Handforth Kome: Yes, we sometimes give the waiver to an eligibility waiver and allow funding of buildings for the general conduct of government under CDBG-DR. And this question goes to an early on the FAQs that asked whether everything that you put in for damage in infrastructure had to be CDBG-eligible. And the answer is no. We are just looking for straight up numbers on damage. So if you were talking about the threshold, damage to a public building does count as damage to permanent infrastructure. If you want to go on in Phase 2 and fund it, you would ask for the waiver on buildings for the general conduct of government and make a good case for it.

Lynsey Johnson: All right, that was the last text question. Any other questions via text or over the phone? We will give it a couple of seconds. All right.

Jessie Handforth Kome: George, do you got anybody?

George Martin: No, it does not look like it. Quiet crew on the phones today.

Jessie Handforth Kome: I know there is a bunch of you still out there. And Todd, Lynsey, and I are still here. So if you want us to answer the questions, let us know. Otherwise, I am available at resilientrecovery@hud.gov. I am working on another update to the FAQs that I do not think I am going to pull off getting out tomorrow because you guys have been filling up the mailbox today. But I do hope to get it out at some point next week. Mostly, the questions coming in at this point relate to the 424 and to citizen participation. And we really answered a lot of those questions today one way or another.

George Martin: I think Ben Anderson would like to ask a question over the phone. You also submitted a question in writing. He just took his hand away. So maybe he just wants to address his text question.

Lynsey Johnson: He sent in a text question, okay. Can impact be combined across disasters?

Todd Richardson: So if it is an impact, if it is a sub county area—

Jessie Handforth Kome: The same sub county area.

Todd Richardson: —same sub county area and it had two disasters, yes.

Jessie Handforth Kome: Like Roundup, Montana, I believe, is a sub county area that got hit by three disasters in a row three years running. Then they are all different disasters. So if Roundup is your sub county area, then you could just tell us all the impacts of how they add up, how the distress adds up, and whatever the unmet recovery need is.

Lynsey Johnson: All right, sorry. I am just trying to give an answer really quick. One question came in or a comment. Could you please try your best to post the webinar slides tomorrow? Some of the people are working on it over the weekend. So let me work on that question. The next question is can you explain what an explanation of why existing CDBG funds are not meeting infrastructure? Can that just be in the narrative? Can you explain what an explanation of why existing CDBG funds not meeting infrastructure? Can that just be included in the narrative?

Jessie Handforth Kome: I think I need you to resend that question. Are you talking about existing CDBG-DR fund, questioner? I do not know who that came from.

George Martin: It came from Simon McDonald.

Jessie Handforth Kome: Simon, can you rephrase because we cannot quite understand that question? Is it CDBG-DR fund?

Todd Richardson: Or raise your hand and we will talk to you.

Jessie Handforth Kome: Yeah, raise your hand and we can talk to you some.

Lynsey Johnson: There he is.

George Martin: Simon, if you press star six you will be unmuted on your phone.

Simon McDonald: Hello?

Jessie Handforth Kome: There you go.

Simon McDonald: Hello. Hi, sorry. Apologies for the incoherent question. I was trying to type too fast. I am looking at the checklist for infrastructure. And under the data source criteria, on the last one is your explanation of why existing CDBG-DR resources together with other funding sources are inadequate to meet this repair need. Is that just a statement in our narrative explaining that? Or is it something more formal?

Jessie Handforth Kome: It is a narrative, yeah. That is a statement in your narrative. The existing grantees that have CDBG-DR from Public 113-2 especially just got a third trench of formula allocation.

Simon McDonald: Yeah.

Jessie Handforth Kome: That has not yet been submitted to HUD in any of these cases. And so we need that statement.

Simon McDonald: Yeah, it is being submitted tomorrow in our case.

Jessie Handforth Kome: Or it is being submitted tomorrow in your case.

Simon McDonald: Okay. I also asked about the windshield question, if that is under the definition of what a windshield survey was. Because we have documentation that our programatic staff have had multiple contacts and multiple site visits for businesses, which continued on that repair needs, an explanation backup data. That counts as a windshield survey.

Todd Richardson: That will work if those people have been there. They have seen the damage. And they can confirm that, in fact, there is continuing recovery needs there. That is what we are looking for. So if that is the way they went and saw the property that is fine. You need to give us the address of the property, then how you are documenting that they still have needs.

Simon McDonald: Okay. That is great. Great!

Lynsey Johnson: All right.

Jessie Handforth Kome: Thanks, Simon.

Lynsey Johnson: Thanks, Simon. We did have a couple more come through the chat box. The question is I thought requests for all anticipated waivers had to be done within the Phase 1 application. Is my memory incorrect? I hope it is.

Jessie Handforth Kome: I do not think there is any way you guys can be doing eligibility, national objectives, and overall benefit waiver requests with your Phase 1 application. There is no project yet. There are no activities. So I do think that is right. I think if you know in Phase 1 that you will need a waiver, you can make a request. We really put that in there in case somebody got really creative and we had not thought of everything. But really, the waiver requests, we are expecting heavy-duty waiver requests for Phase 2.

Lynsey Johnson: All right, next question. Just to confirm, work listed in threshold does not have to be CDBG-eligible. They would only need to be CDBG-eligible if we, in Phase 2, want to fund the work, correct.

Jessie Handforth Kome: Yeah, that is basically right. The work or the damage, the distress listed, the threshold, the unmet recovery need does not actually have to be CDBG eligible. If you got selected and went on to Phase 2, you would have to think up a CDBG eligible way to address the unmet recovery need or make waiver requests and show good cause.

Lynsey Johnson: Great. Side note on the slides, we are going to try to get these slides posted as quickly as possible. And so with that, we are going to try to get them up tomorrow. But once again, you will see the notice come up once they are posted. So we will try to get these up as soon as possible.

Jessie Handforth Kome: Yeah, the only reason that we are slowed down the slides because I know it seems like you should just be able to post them. We are under a legal obligation to provide – post them in a way that—

Todd Richardson: 508 compliance.

Jessie Handforth Kome: 508 compliance so disability acceptable. And it takes us – and as you can tell, this slide deck in particular, we were on the fly.

Lynsey Johnson: Next question, what are acceptable ways to operationalize serious damage for the threshold requirements?

Jessie Handforth Kome: Isn't serious damage not a housing – is it not the only place we use it in the threshold, serious damage?

Todd Richardson: Yes and we have a FAQs on how we define serious damage for purposes of the most impacted. And housing is one of the big FAQs. I do not remember which number it is. But the more general answer to that is that we are allowing you to tell us what your criteria would be for serious damage. We have given you an assessment of what we use using the individual assistance data inspections for determining serious damage. But we are leaving – the NOFA does not specify a definition for serious damage. But you will need to explain to us your definition for serious damage if you are using those criteria.

Jessie Handforth Kome: Right, I mean you can say we are using the same definition as FEMA for IA purposes. Or you can say that we look at serious damage as—

Todd Richardson: Some percentage of the value of the property or something or something of that nature. And Lynsey, question 46 gives what our definition is that we use on the appendix housing definition for serious damage.

Jessie Handforth Kome: So that was Q46.

Lynsey Johnson: Great, all right. Next question, is it correct that Appendix I consultation summary does not get posted during the public comments, but is attached with the application?

Jessie Handforth Kome: Let me take a quick look at what we put in the two locations. Lynsey, you look in Appendix A. Do you have Appendix A handy?

Because we could not give you the direction just once, we had to do it twice. The NOFA Proper says that what you are going to include is executive summary, factor narratives, eligibility, national objectives, overall benefit schedule responses, opportunity for public comment, which is telling them how to comment, and substantial amendment criteria. Appendix A as in your threshold response, I think. And I do not think it says that you have to do Appendix I. It lists Appendices A through H. Yeah, I think that is correct. Appendix I, consultation summary does not get posted during public comment, but it is attached to the application.

Lynsey Johnson: Yeah, yeah. All right, next question. It says no projects in Phase 1. How do we answer the CDBG eligible activities question in threshold?

Jessie Handforth Kome: We have a FAQ on this (Q175). Basically, you are going to make the certification first that you are going to follow all applicable laws. That binds you to eligibility. The second piece is in your threshold response, say that you intend to take eligible activities. You can tell us how you are going to do that. But it is enough to tell us that you are going to do it. There is nothing more really you can do in Phase 1. We just wanted to make sure you are not aimed in the wrong direction.

Lynsey Johnson: All right, next question. What does “proposal incorporates resilience” mean in Appendix J?

Jessie Handforth Kome: Well to be responsive, one of the thresholds is that your proposal that you give us has to incorporate resilience. When we are going through and scoring your application, it would be really nice if we can find exactly where your proposal incorporates resilience. Tell us what document or documents and file names where we can find and no for sure that your proposal incorporates resilience. I am assuming that it is going to be in your long-term commitment and at a rock bottom minimum. But your idea or concept may have something about resilience as well.

But that is a threshold requirement that you are not just putting things back the way they were; going back to the old normal. But that you were trying to incorporate resilience. We did not anticipate while we were writing the NOFA that everybody would get so on board with this actually. So it seems a little odd now after the academies and realizing how everybody wants to incorporate resilience. But that is what that means in Appendix J.

Lynsey Johnson: Next question, can you explain the schedule that we have to include in public comments?

Jessie Handforth Kome: Yeah, that is just letting your citizens know about the schedule for the competition and the schedule for what actions you need to take in Phase 1. In Phase 2, of course, there is a schedule you are going to submit. And you are going to have to give that to citizens.

Lynsey Johnson: Does Simon have his hand raised, George? Or is that from before?

George Martin: I think it is just from before. We just got one more written question that came in.

Lynsey Johnson: Okay, got it, sounds good. Our next question, do both public hearing and public comment require 15 days in advance notes or less for a public hearing if that is the town rule? We want to hold the hearing a few days early to leave time for more comments afterwards and still leave time to finish the proposal.

Jessie Handforth Kome: I do not think we have published for the NOFA that you have to have 15 days advance notice. You are going to be covered by your own CDBG Citizen Participation Plan because these are still CDBG funds. I mean you can always make changes in participation plans by going in on public comment and making those changes. But we require reasonable advanced notice of a hearing. There is a 15-day public comment period. I do not believe we require advanced notice for a public comment period.

Lynsey Johnson: Okay. That looks like that is the end of the chat questions again. If anyone wants to submit any additional chat questions, we are happy to answer them. Or please feel free to hit the little hand icon. And we will take your verbal question over the phone. All right. So that – any other comments?

Jessie Handforth Kome: No, I know you guys are working really hard. I am checking the mailbox about once an hour, more often if I can see the questions kicking in. And I am trying to get the answers turned around pretty quickly so that you can keep moving forward as fast as possible. But we are there for you at resilientrecovery@hud.gov right up to the deadline.

Lynsey Johnson: Great! Once again, we are going to get these slides posted as soon as possible. So just make sure to check your email boxes and make sure you have signed up for the email list for CDBG or CDBG-DR through HUD Exchange. And those emails will get sent to you. And with that, thanks everyone for joining us today. And we will see you here again for the next webinar that we have in a couple weeks. Thank you.