



# Community Development Block Grant National Disaster Resilience (CDBG- NDR) Competition

*Thresholds and Eligible/Ineligible Activities*

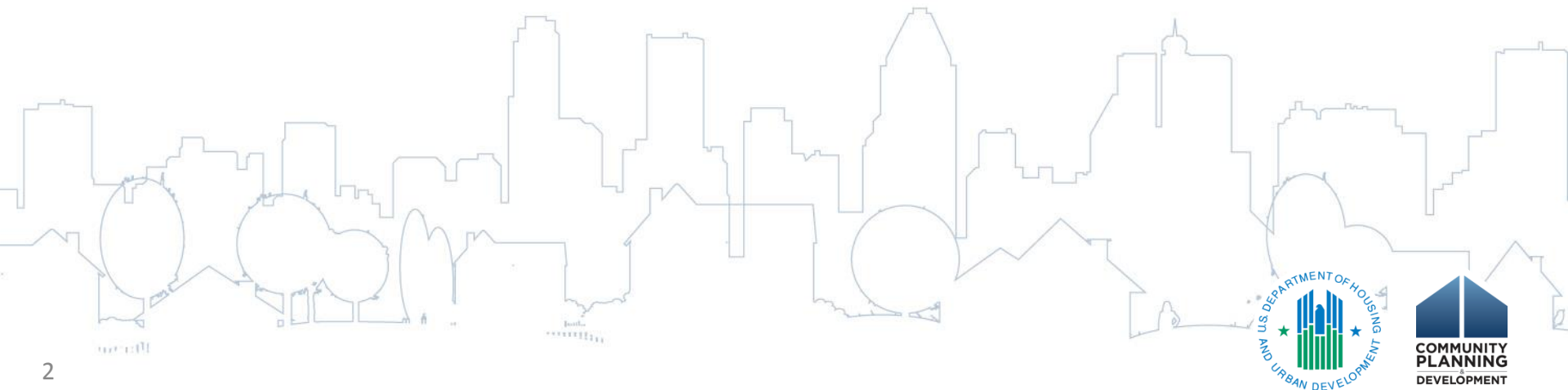
# Presenters

## Office of Community, Planning and Development

- Meg Barclay – Office of Block Grant Assistance

## Office General Counsel

- Makani Drummond



# Agenda

1. Overview of the NDRC
2. Threshold Requirements
  1. NDRC NOFA Threshold Requirements
  2. Requirements incorporated from Section III.C.2. of the General Section to the Department's Fiscal Year 2014 NOFAs for Discretionary Programs
3. Eligible Activities
4. Ineligible Activities
5. Eligibility Waivers



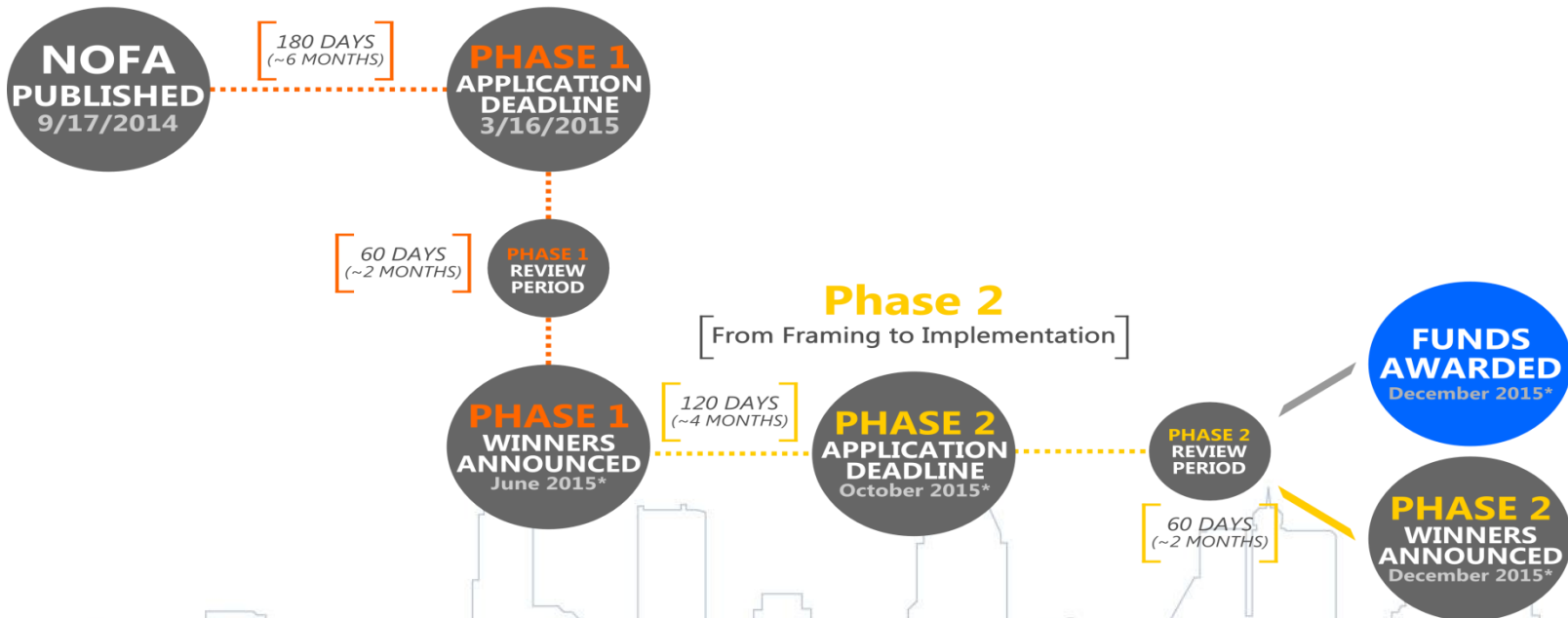
# NDRC Overview

- The National Disaster Resilience Competition (NDRC) makes available nearly \$1 billion to communities that have been impacted by natural disasters **between 2011-2013**.
- The competition encourages communities to not only consider how they can recover from a past disaster but also how to avoid future disaster losses...**to be more Resilient**
- Applicants need to link or “tie-back” their proposals to the disaster from which they are recovering, as well as demonstrate how they are reducing future risks and advancing broader community development goals within in their target geographic area(s).

# NDRC Overview

## Phase 1

[Framing Unmet Recovery Needs, Vulnerabilities, and Community Development Objectives]



*\*Note: These dates are tentative and subject to change at HUD's discretion*



# Threshold Requirements

## Background

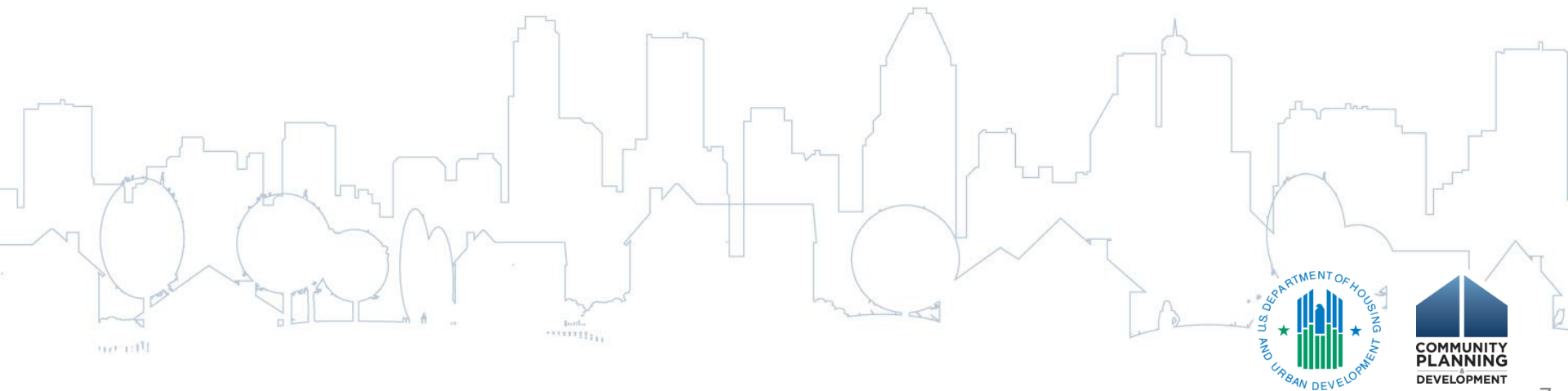
- The “Threshold Requirements” are prerequisites to rating and ranking of an application
- Required at both Phase 1 and Phase 2 of the competition
- Although the NOFA allows for correction of technical deficiencies within applications, failure to submit a narrative exhibit or an attachment is not a technical deficiency – Applicants must respond to Threshold Requirements.



# Threshold Requirements

## Location of Threshold Requirements

- NDRC NOFA and
- Section III.C.2 of the General Section to HUD's FY2014 NOFAs for Discretionary Programs



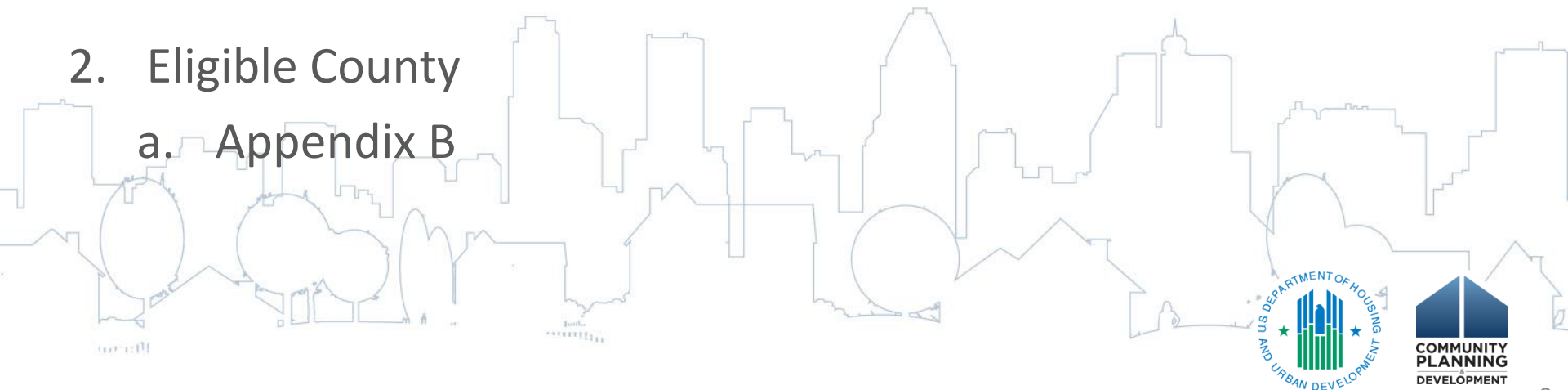
# Threshold Requirements – NDRC NOFA

## 1. Eligible Applicant

- a. Indicate on Crosswalk Checklist (Appendix J)
- b. If applicable, submit Partner Documentation (Appendix C & D)

## 2. Eligible County

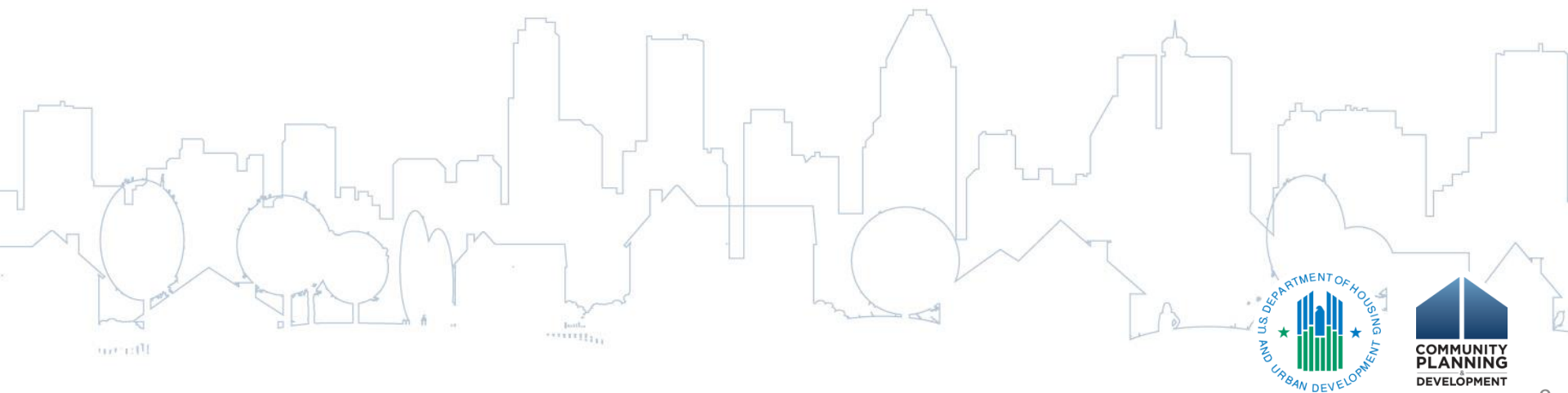
- a. Appendix B





# Threshold Requirements – NDRC NOFA

3. Most impacted and distressed target area
  - a. Most impacted and distressed and (Appendix G)
  - b. Unmet recovery need (Appendix G)



# Threshold Requirements – NDRC NOFA

## Most impacted and distressed

- A County previously determined by HUD to be “most impacted and distressed”

## OR

- A sub-county area within a county declared a major disaster area
- With at least one Most Impacted Characteristic
  - Housing
  - Infrastructure
  - Economic Revitalization
  - Environmental Degradation

## **AND** at least one Distressed Characteristic

- Disaster impacted low and moderate income households
- Loss/shortage of affordable rental housing
- Disaster impacted a federal target area or economically fragile area
- Disaster impacted an area with prior documented environmental distress



# Threshold Requirements – NDRC NOFA

## Unmet Recovery Need

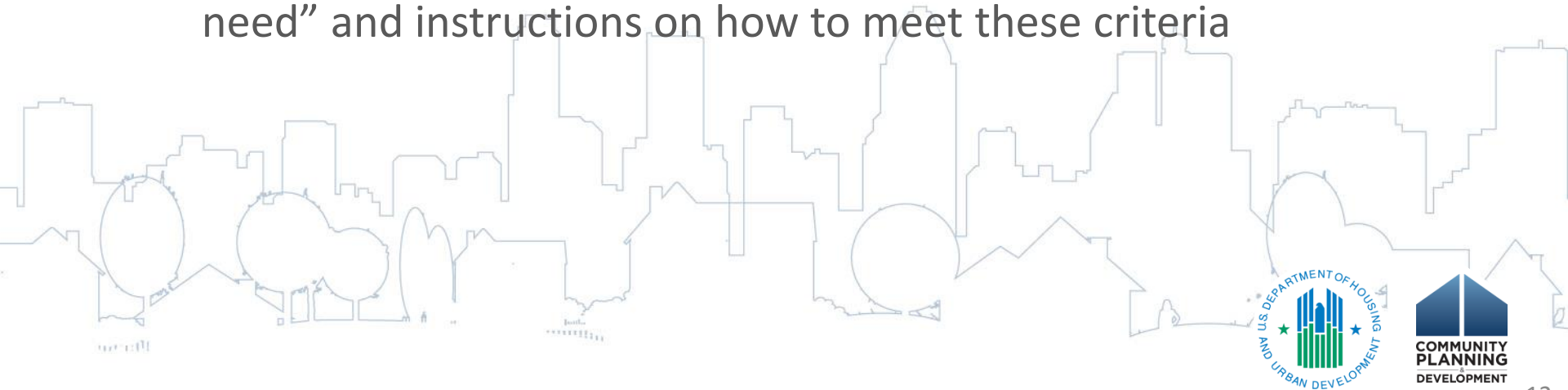
- Housing
  - Infrastructure
  - Economic Revitalization
  - Environmental Degradation
- 
- Applicants only need to demonstrate that one area is most impacted and distressed and has unmet recovery need to meet the “Most impacted and distressed target area” threshold requirement.
  - If an Applicant wants to use CDBG-NDR funds in an additional area, the Applicant must identify the areas, and demonstrate how they meet the “most impacted and distressed” and “unmet recovery needs” criteria in Appendix G.



# Threshold Requirements – NDRC NOFA

Additional References for “Most impacted and distressed” and “unmet recovery need” threshold requirement

- NDRC NOFA: Unmet Recovery Need/Most Impacted and Distressed Threshold Response Briefing Webcast available at: [www.hudexchange.info/news/ndrc-webinar-series/](http://www.hudexchange.info/news/ndrc-webinar-series/)
- Appendix G for the criteria needed to establish “Most impacted and distressed target area” and “unmet recovery need” and instructions on how to meet these criteria



# Threshold Requirements – NDRC NOFA

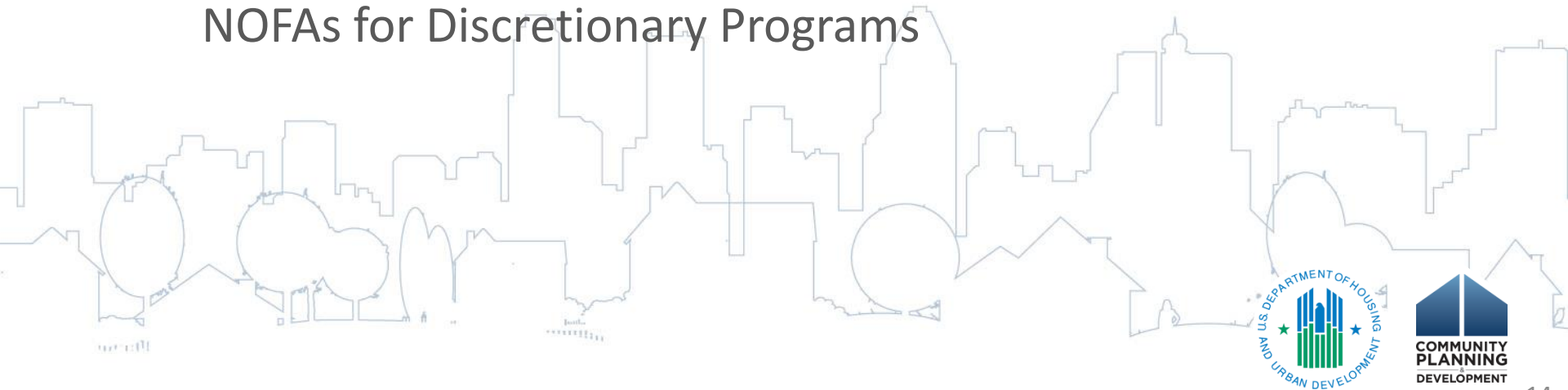
4. Eligible Activity
5. Resilience Incorporated
6. Meet a national objective
7. Overall Benefit
8. Establish a tie-back
9. Benefit-cost analysis (Phase 2 only)



# Threshold Requirements – General Section

Resolution of Civil Rights Matters to be eligible for funding

- Must be resolved HUD's satisfaction
- Before or on the application deadline date
- Section III.C.2 of the General Section to HUD's FY2014 NOFAs for Discretionary Programs



# Eligible Activities

## Eligible Activities Generally

- CDBG-NDR funds must be used for a CDBG-eligible activity
  - States – eligible activities are described at 42 U.S.C. § 5305(a)
  - Local governments – eligible activities are described in 24 C.F.R. Part 570, Subpart C
  - Subject to waivers and alternative requirements in Appendix A
- Or an activity eligible under a waiver or alternative requirement



# Eligible Activities

## Waivers and Alternative Requirements to Eligible Activities in the NDRC NOFA, Appendix A:

- Assistance to businesses
  - Limited to small businesses as defined by the Small Business Administration under 13 CFR Part 121
  - CDBG-NDR funds may not be used to directly assist a privately-owned utility for any purpose
- New housing construction is an eligible activity





# Eligible Activities

## Waivers and Alternative Requirements to Eligible Activities in the NDRC NOFA, Appendix A:

- Direct homeownership assistance
  - Permitted for households with up to 120% of the area median income
  - Permitted to provide up to 100% of downpayment required from homebuyers
- Housing incentives
  - Allowed to relocate individuals outside of floodplains
  - Must increase resilience



# Eligible Activities

## Waivers and Alternative Requirements to Eligible Activities in the NDRC NOFA, Appendix A:

- Interim mortgage assistance
  - Permitted for qualified individuals for up to 20 months
- Housing rehabilitation/Assistance for Second Homes
  - CDBG-NDR funds may not be used for rehabilitation assistance, housing incentives, or the CDBG-NDR buyout program for a “second home” as defined in IRS Publication 936



# Eligible Activities

## Waivers and Alternative Requirements to Eligible Activities in the NDRC NOFA, Appendix A:

- Direct administration of assistance to neighborhood organizations described in 42 USC 5305(a)(15)
  - Activities made eligible at 42 U.S.C. 5305(a)(15) may only be undertaken by the eligible entities described in that section



# Ineligible Activities

Ineligible activities include:

1. Any activity that is not eligible under 42 U.S.C. § 5305(a) for States, or 24 C.F.R. Part 570.201 through 570.207 for local governments, unless waived by HUD
2. Any activity that does not meet a national objective under the requirements of Appendix A, unless waived by HUD. HUD will not waive a national objective entirely, and national objective waivers/alternative requirements are exceedingly rare.
3. Any activity for which there is no unmet recovery need or tie-back to a qualified disaster



# Ineligible Activities

4. Use of CDBG-NDR funds to pay for any activities carried out on or before the date of the letter announcing the award of the grant funds, except funds may be used to reimburse costs of NDR grant application preparation, planning, and citizen outreach activities.
5. Any activity not in compliance with applicable fair housing and civil rights laws and regulations
6. Projects dependent on a contingent action to be effective or feasible, and projects which are not feasible and/or effective at significantly reducing the risk against the threat(s) and hazard(s) for which the project was designed



# Ineligible Activities

7. Projects for temporary measures, including those that are designed solely to prepare for future needs and not to address a recovery need of the Qualified Disaster
8. Response activities, equipment, and training
9. Projects sited within a Special Flood Hazard Area where the jurisdiction is not participating in the National Flood Insurance Program



# Eligibility Waivers

- The Secretary may grant waivers to add a new eligible activity or modify existing eligible activities when good cause exists and the waiver is not inconsistent with the overall purposes of Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.)
  - Appendix E describes the process of requesting waivers
  - Waiver request may not be approved, and HUD may impose additional alternative requirements when granting a waiver



# Resources

## Grants.gov

- [www.grants.gov](http://www.grants.gov)
- Download the NOFA and supporting documents
  - Click “Apply for Grants” in the “Applicants” menu
  - Click “Download an Application Package”
  - Enter the CDFA Number to download (CDFA#: 14.272)
  - Click “Download”
  - Enter your email and click “Submit”
  - Click “Download Application Instruction” and “Download Application Package”

## NOFA website

- [www.hudexchange.info](http://www.hudexchange.info)
- Link to NOFA on grants.gov
- All webinar recordings will be posted online

## Data Resources

- [www.huduser.org](http://www.huduser.org)

## Resilient recovery website

- [www.hudexchange.info](http://www.hudexchange.info)
- Resources and research on disaster resilience





# Questions?

Send all questions about the NOFA  
to:

[ResilientRecovery@hud.gov](mailto:ResilientRecovery@hud.gov)

