

## **NDRC NOFA: Thresholds and Eligible/Ineligible Activities Webcast Transcript**

Meg Barclay: Hello, and thank you for listening to the Community Development Block Grant National Disaster Resilience Competition: Thresholds and Eligible/Ineligible Activities Webcast. Presenters today will be myself, Meg Barclay, from the Office of Block Grant Assistance within HUD's Office of Community Planning and Development and, Makani Drummond from the HUD's Office of General Counsel. Hi, Makani.

Makani Drummond: Hi, Meg.

Meg Barclay: So, a quick overview of the agenda. We'll do a brief overview of the National Disaster Recovery Competition process and goals. We will, Makani will then cover threshold requirements, including the NDRC NOFA threshold requirements, as well as requirements incorporated from Section III.C.2 of the General Section of HUD's Fiscal Year 2014 NOFAs for Discretionary Programs. Those are standard requirements across HUD NOFAs. Then, he'll review eligible activities, ineligible activities and then eligibility waivers that you may or may not need.

The National Disaster Recovery Competition makes available nearly a billion dollars to communities that have been impacted by natural disasters between 2011 and 2013. The competition encourages communities to not only consider how they can recover from the past disaster, but also how to avoid future disaster losses. In other words, to become more resilient, rebuild in such a way that you're less vulnerable to the impacts of future disasters. Applicants need to link or tie back their proposals to the disaster from they're recovering, but also demonstrate how they are reducing future risks and advancing broader community development goals within their target geographic areas.

This slide provides sort of an overview or a picture of the process for the NDRC. In Phase 1, applicants will be considering disaster recovery needs, vulnerabilities, stakeholder interests, resilience, community development objectives and investment alternatives for that first phase of the application. And, it's really structured to guide each applicant through broad consideration of their disaster recovery needs, vulnerabilities, and stakeholder interests in resilience and other community development objectives, and also investment alternatives. Phase 1 is considered to be a framing phase, and it will last 180 days from the announcement of the competition, which was announced on September 17, 2014. And, as such, the last day to submit applications, as you see here on this slide, is March 16 of 2015. After the Phase 1 applications are submitted, HUD will review them and invite a subset of applicants from Phase 1 to participate in Phase 2. And, in Phase 2, applicants will consider and refine approaches to meet needs and objectives identified in Phase 1. HUD will make funding awards at the conclusion of Phase 2, which as you see on this slide, is roughly estimated to be December of 2015. Phase 2 calls for reconsideration of those issues at a more granular, the issues, sorry, identified in Phase 1, at a more granular level of detail. This is when HUD will be expecting much more detailed information about specific proposed projects and how they related to recovery from the disaster in the case of projects who will be using CDBG-NDR funding for, but also overarching resilience planning. The time date, the dates you see on this slide, it's important to

note are tentative and subject to change at HUD's discretion. So, stay tuned in case there may be any changes to that.

And, now, Makani will take over with the threshold requirements.

Makani Drummond: Thank you, Meg. The threshold requirements are requirements of the National Disaster Resilience Competition that must be met before HUD will rate and rank an application. If an application does not meet all threshold requirements, HUD will not consider the application as eligible for funding and HUD will not rate and rank the application. The threshold requirements, which we'll cover shortly, must be met during both phases of the competition. However, applicants may reference and summarize responsive materials from their Phase 1 submissions in Phase 2, rather than repeat submissions in their entirety. As we'll discuss, applicants will demonstrate compliance with the threshold requirements through information that they submit in their applications, primarily through responses in Narrative Exhibit B, which is the portion of the application specifically devoted for applicants to provide narrative responses to threshold requirements. If partners are involved, however, applicants must provide partner letters and partner agreements in order to comply with the eligible applicant threshold requirement. And, these documents will be provided as Attachment A to your application. Failure to respond to threshold requirements cannot be corrected or cured, so it's important to note that an applicant must respond to threshold requirements to receive consideration under the National Disaster Resilience Competition.

The threshold requirements for the NDRC are located in two places, in the NDRC NOFA itself, and in Section III.C.2 of the General Section to HUD's Fiscal Year 2014 NOFAs for discretionary programs.

We'll first take a look at the threshold requirements in the NDRC NOFA. These are the threshold requirements that will each require a narrative response from the applicant as part of their Narrative Exhibit B. The first threshold requirement is the eligible applicant threshold requirement. The NDRC funds were made available through the Disaster Relief Appropriations Act of 2013, which gave the Secretary of HUD discretion to provide assistance to states and local jurisdictions for necessary expenses related to recovery in the most impacted and distressed major disaster areas in 2011, 2012, and 2013. So, to meet this threshold requirement, applicants must identify that they are one of the 67 jurisdictions indicated by HUD as eligible to compete for this competition. These 67 eligible applicants are identified in the NDRC NOFA itself. In addition to responding to this threshold, applicants should identify which eligible applicant they are on the crosswalk checklist, which is a document that HUD will use during review of applications to locate all required responses. The crosswalk checklist is provided as Appendix J to the NDRC NOFA, and it should be submitted as Attachment A to your application. Applicants that choose partners to assist them in applying for funding or in carrying out an activity under this competition must also submit a partner letter and a partner agreement for each partner and these documents are provided in Appendix C and D of the notice. If applicable, these forms of partner documentation need to be provided to satisfy the eligible applicant threshold requirement. The second threshold requirement in the NDRC NOFA is the eligible county threshold. This threshold insures that the area primarily benefiting from the proposed National Disaster Resilience activity or project is the most impacted and distressed area within a county for which a 2011, 2012, or 2013 major disaster declaration exists. Applicants should refer to the excel file that is Appendix B to the NDRC NOFA for a list of eligible

counties with major declared disasters occurring between January 2011, and December 2013, and identify the appropriate eligible county from that list.

The third threshold requirement in the NDRC NOFA is the most impacted and distressed target area threshold. This threshold requirement has a statutory basis in the Disaster Relief Appropriations Act of 2013, and applicants must demonstrate that the area primarily benefiting from their proposed activities is the area that is most impacted and distressed as a result of a qualified disaster, and that the area has unmet recovery needs. So, there are two components to this threshold requirement, most impacted and distressed, and unmet recovery need. Both of these components have a statutory basis in the Disaster Relief Appropriations Act and reflect the statutory mandate that funds remain available for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster in 2011, 2012, and 2013. Additionally, this threshold requirement is designed to elicit data from applicants in order to best meet the statutory mandate that HUD allocate funds based on the best available data. Because of the importance of this threshold requirement, HUD has devoted Appendix G of the NDRC NOFA to providing detailed instructions on the criteria that must be met to satisfy a demonstration of most impacted and distressed and unmet recovery need in each applicant's narrative response. All applicants need to demonstrate both components of this threshold by submitting a response in the format required by Appendix G. Even applicants that took advantage of the 45-day window and submitted a written response for HUD review of these thresholds must submit a response in the format required by Appendix G, regardless of the response you received back from HUD.

Now, we'll divert our attention and take a quick look at the two components of this threshold, the most impacted and distressed, and unmet recovery need components. For the most impacted and distressed component, applicants can meet this threshold by demonstrating that the area primarily benefiting from the proposed activity is a county that was previously determined by HUD to be most impacted and distressed. Or, by providing a response to this threshold criteria that demonstrates that the area primarily benefiting from the proposed activity is a sub-county area within a county declared to be a major disaster area. And, by demonstrating at least one most impacted and distressed characteristic, most impacted characteristic and at least one distressed characteristic. Most impacted characteristics, which are described in Appendix G, are, there are four types of most impacted and distressed characteristics. Housing, which refers to a concentration of housing damage in an area; infrastructure, which refers to damage to permanent infrastructure; economic revitalization, which refers to significant employment loss and extended harm to the local economy; and environmental degradation that threatens long-term recovery, critical natural resources and placing housing infrastructure and/or economic revitalization at risk. There are also four types of distressed characteristics, which research and experience have indicated result in greater disaster impact and more costly and difficult recovery and revitalization when they exist prior to a disaster. These distressed characteristics are characteristics that would have existed prior to a qualifying disaster. The four types of distressed characteristics are disaster impacting a low and moderate income households, loss or shortage of affordable rental housing, evidence that the disaster impacted a federal target area or economically fragile area, or evidence that the disaster impacted an area with prior documented environmental distress. Applicants should carefully read the requirements for demonstrating these characteristics in Appendix G. Appendix G includes detailed instructions on the showings that must be made to demonstrate each of these characteristics, as well as acceptable forms of data that applicants need to provide to support their narrative submissions. Additionally, links to lists of the counties previously determined to be most

impacted and distressed by HUD, and lists of the sub-county areas within major disaster area counties are included in Appendix G to the NDR NOFA.

The second component of the most impacted and distressed target area threshold is unmet recovery need. This is the requirement that the area identified as most impacted and distressed has unmet recovery need. Unmet recovery need is a term that's defined in the NDRC NOFA in Section 1.C.15 and, it means that, and this is the definition, "An unmet recovery need arises from damage or another harm or negative effect directly or indirectly caused by a qualified disaster that has not been met and for which no funds are available, and that HUD, in reviewing the information provided by the applicant determines to be a need related to long-term recovery, restoration of infrastructure, restoration of housing or economic revitalization." At a minimum, applicants will need to demonstrate at least one category of unmet need in the area identified as most impacted and distressed. There are four different categories of unmet need. Housing, which refers to remaining housing repair needs; infrastructure, which refers to damage to permanent, public infrastructure that has not and cannot be repaired with existing resources; economic revitalization, which refers to continuing unmet business needs; and environmental degradation, which refers to environmental damage that has not and cannot be addressed with existing resources. As with the most impacted and distressed component, or threshold, applicants should carefully read the requirements for demonstrating unmet recovery need in Appendix G. Appendix G includes detailed instructions on the showing that must be made to demonstrate each of the characteristics of unmet recovery need, as well as acceptable forms of data that applicants need to provide to support their narrative submission. 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. However, if an applicant wants to use CDBG-NDR funds in any additional areas, the applicant must identify those areas and demonstrate how they meet the most impacted and distressed and unmet recovery needs criteria in Appendix G. HUD prefers the applicants to make this demonstration during Phase 1 for all target areas. And, if a most impacted and distressed target area is added during Phase 2, HUD expects applicants factor two and factor three submission to specifically address how the residents and stakeholders of the additional area participated in the Phase 1 framing and consultation process.

Meg Barclay: And, I just want to jump in really quick here, before you switch the slide. This is a really different thing for HUD to be—normally, we identify most impacted and distressed areas in the case of disaster recovery, and we distribute the money by formula according to those criteria. But, because this is addressing older disasters, we are giving grantees the opportunity to give us better data than what we have out there. But that's definitely, at least as far as I know, it's not very precedented, if it's not unprecedented. It's a new thing for HUD, it's a new thing for applicants, and this is something that you want to be very careful about, especially if you are submitting, if you are going to add target areas between a Phase 1 and Phase 2 application. These are, this is a threshold factor and if the factor is not, if the threshold is not met, the application is considered unresponsive.

Makani Drummond: Thanks, Meg. I agree. It's, it can't be overstated how important this threshold requirement is.

Meg Barclay: And, it may be one of the more difficult threshold requirements to meet, because it's the work that HUD has traditionally done for grantees before they receive an allocation under a disaster recovery program.

Makani Drummond: Absolutely, these threshold requirements, the most impacted and distressed, and the unmet recovery need thresholds require very detailed showings, detailed responses from the applicants, supported by sound and reliable data.

Meg Barclay: Very, a lots of, and that data is specifically described in Appendix G, related to engineering studies, or those types of information. It's not a small hurdle to get over, I don't think, or not an easy one, to me anyway, to understand.

Makani Drummond: Right. So, applicants should be sure to refer to Appendix G for the criteria that they need to establish for most impacted and distressed target area and unmet recovery need, and for instructions on how to meet these criteria and the supporting data that they'll need to provide.

Additionally, applicants should refer to a previous webcast, which is linked on this slide, on how to exchange, which covers unmet recover need and most impacted and distressed thresholds in particular.

Meg Barclay: And, these slides are available for download on the NDRC Webinar Series website.

Makani Drummond: Now, let's go back to the threshold requirements that are indicated in the NDRC NOFA. The fourth threshold requirement that will require a narrative response from applicants as part of Narrative Exhibit B is the eligible activity threshold requirement. To meet this threshold, applicants must demonstrate that each proposed activity is an eligible activity or request an eligibility waiver. We'll discuss both of these later in the presentation, both eligible activities and the process for requesting an eligibility waiver.

The fifth threshold requirement is resilience incorporated. To meet this threshold, applicants must demonstrate that each disaster recovery activity proposed can reasonably be expected to improve the most impacted and distressed areas resilience to current and future threats and hazards, including the effects of climate change. While each application needs to demonstrate a logical link to addressing unmet recovery needs from past qualifying disasters, this NDRC NOFA instructs applicants to design innovative and resilient projects that will function well through the reasonably foreseeable future conditions and disruptions. This concept, applicants should be aware that this concept of resilient recovery is also incorporated into the rating factors, and only Phase 1 applicants that demonstrate taking or committing to take at least one permanent action to increase resilience of a target area, region or state will be invited back to participate in Phase 2.

The sixth threshold requirement is the requirement to meet a national objective. To meet this threshold requirement, applicants must demonstrate that each proposed disaster recovery activity, other than general administration planning, will meet a CDBG-NDR national objective or alternatively, request a waiver of the national objective. But, applicants should be cautioned that HUD will not waive a national objective entirely, and waivers or alternative requirements to national objective requirements are very rare. The national objectives, generally, are activities benefiting low and moderate-income person, activities which aid in the prevention or elimination of slums or blight, and activities designed to meet community development needs having a particular urgency. These are also covered in Appendix A, so we encourage applicants to refer to Appendix A of the NDRC NOFA. HUD recognizes that applicant's responses to eligible activity threshold and the national objective threshold may be limited in Phase 1, the framing phase of the competition, as

applications will generally provide broader ideas or concepts, and may not yet specify particular projects or activities.

The seventh threshold requirement is the overall benefit threshold. To satisfy this threshold, applicants must demonstrate that at least 50% of the funds requested in an application go towards activities that will provide sufficient benefit to low and moderate income persons in the form of services, area benefits, housing or jobs to meet the national objective of benefit to low and moderate income persons. Alternatively, applicants can request a waiver from HUD of the overall benefit requirement, but these waivers, waivers of overall benefits are very uncommon and are assessed under a higher standard by HUD. They must meet a compelling needs test.

The eighth threshold requirement is the requirement to establish a tieback. All applicants need to establish a tieback to a major disaster in the years 2011 through 2013 for each proposed national disaster resilience funded activity. In the context of the NDRC NOFA, a tieback means a reasonable showing of how the effects of a qualified disaster resulted in an unmet recovery need that can be addressed by the proposed CDBG-NDR funded activities. Applicants will need to demonstrate how every activity they proposed reasonably ties back to addressing demonstrated, direct and indirect effects of the qualified disaster. The NDRC NOFA provides examples of tieback for applicants, so we encourage you to look to the notice. For physical losses, applicants can establish tieback by demonstrating direct effects of disaster through damage or insurance estimates. For economic, social, or other non-physical losses, this demonstration might be made through post-disaster analyses or assessments. Applicants should note that funds awarded pursuant to this competition may be used to address an unmet need that arose from a previous disaster or previous community development needs, so long as those needs were exacerbated by a qualifying disaster, that is, a major disaster in 2011 through 2013.

The final threshold requirement that applicants will find in the NDRC NOFA is the benefit cost analysis requirement. This is a threshold requirement that applies to Phase 2 only and to meet this threshold, applicants need to submit a benefit cost analysis that meets the requirements in Appendix H, with their Phase 2 application for covered projects. Covered projects is a defined term in the NDRC NOFA, and it generally means major infrastructure projects above a certain cost, and major infrastructure projects, which benefit multiple counties.

The NDRC NOFA also incorporates several threshold requirements from Section III.C.2 of the General Section to HUD's Fiscal Year 2014 NOFAs for discretionary programs. The incorporated threshold requirement requires applicants to resolve civil rights matters before or on the application deadline for an applicant to be eligible for funding. There are a variety of civil rights matters that must be resolved, and they include various charges, cause determinations, lawsuits and letters of findings against the applicant. There are a variety of civil rights matters under a variety of civil rights statutes that must be resolved before the application deadline, and it's important to note that these issues must be resolved to HUD's satisfaction. Applicants that believe that they may have outstanding unresolved civil rights matters should carefully read the section of the General Section NOFA for specifics on the civil rights matters that must be resolved for eligibility for funding and for examples of actions that may be considered sufficient to resolve these matters.

We'll begin with eligible activities that can be funded with the use of NDR funds. The National Disaster Resilience Competition was built upon the CDBG program structure. So, generally speaking, CDBG-NDR funds must be used for CDBG eligible activities. For states, these eligible

activities are described at 42 U.S.C. 5305(a), and for local governments, eligible activities are described in 24 C.F.R. Part 570, Subpart C. These general categories of eligible activities are, however, subject to waivers and alternative requirements that have been published in Appendix A of the NDRC NOFA. Additionally, applicants can seek eligibility waivers through HUD, which we'll touch on a little later.

But, first, we'll take a look at waivers and alternative requirements to eligible activities that can be found in Appendix A of the NDRC NOFA. The waivers and alternative requirements that HUD published with the NDRC NOFA and included in Appendix A are applicable to all grantees. These waiver and requirements affect the general CDBG eligible activities found in the statute and regulation cited in the previously slide. As we go through these, you'll note that some of these waivers and alternative requirements limit the general categories of eligible activities while some expand or provide new eligible activities for funding with NDR funds. While I'll cover some of the more salient eligible activity waivers and alternative requirements published in Appendix A in the next few slides, applicants should recognize that Appendix A includes a host of additional requirements related to policies, building and construction standards, certifications and documentation that applicants will need to comply with when carrying out certain eligible activities. Applicants are therefore encouraged to refer and read carefully Appendix A to the NDRC NOFA. Appendix A limits the eligible activity of assistance to businesses. In Appendix A, NDR funds are only permitted to assist small businesses as defined by the Small Business Administration, under 13 C.F.R. Part 121. Additionally, CDBG-NDR funds may not be used to directly assist a privately owned utility for any purpose. So, this is another ineligible activity that's brought in through the waivers and alternative requirements that are published in Appendix A to the NDRC NOFA. Appendix A does, however, permit new housing construction as an eligible activity. Generally, under the CDBG program, new housing construction is permitted only in limited circumstances. So, this is an example of an expansion of an eligible activity within Appendix A to the NDRC NOFA.

Appendix A also permits direct home homeownership assistance for households with up to 120% of the area median income as an eligible activity. This is also an expansion of eligible activities generally permitted under the CDBG program. Grantees are also permitted to provide up to 100% of down payment assistance required by homeowners. This is up from 50%, which is the usual standard under the CDBG program. HUD recognizes that incentive payments are generally offered to encourage households to relocate to suitable housing developments or areas promoted by communities' comprehensive recovery plan, particularly when households are located in flood plains areas. Appendix A, therefore, includes a provision that permits the use of NDR funds for housing incentive payments to relocate individuals outside of flood plains areas. Applicants interested in this use of NDR funds should refer to Appendix A, as it includes information on documentation the grantees must maintain and information on how HUD will assess compliance with this eligible activity.

Appendix A to the NOFA also permits interim mortgage assistance for qualified individuals for up to 20 months. This is also an expansion of an eligible activity. Typically, interim mortgage assistance is only permitted for up to three months under the CDBG program. Appendix A also places a limitation on the housing rehabilitation assistance eligible activity. Under the National Disaster Resilience Competition, CDBG-NDR funds may not be used for rehabilitation assistance, housing incentives or the CDBG-NDR buy-out program for a second home as defined in the IRS Publication 936. So, again, this is a limitation on eligible activities. The CDBG-NDR buy-out program is a buy-out program that's described in Appendix A, and it is a buy-out program for

acquisition of properties in flood plains. Applicants are encouraged to look to Appendix A for more information on the CDBG-NDR buy-out program.

Finally, Appendix A provides a clarification to an ineligible activity. Direct administration of assistance to neighborhood organizations, which is described in 42 U.S.C. 5305(a)(15), may only be undertaken by the eligible activities described in that section. So, this is a clarification or a modification of ineligible activity that's typically permitted under CDBG.

There are additional ineligible activities described in the NDRC NOFA itself. In the past few slides, I touched on some of the waivers and alternative requirements located in Appendix A to the NDRC NOFA. Some of those waivers and alternative requirements described additional eligible activities, while some described activities that are not eligible for NDRC funding. The ineligible activities found in the NDRC NOFA include some of the following. 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 is an ineligible activity unless waived by HUD. Again, later on this presentation we'll briefly touch on eligibility waivers and how applicants can request those. Any activity that does not meet a national objective under the requirements of Appendix A is also ineligible, unless waived by HUD. Applicants should be aware, however, that HUD will not waive a national objective entirely, and national objective waivers and alternative requirements are exceedingly rare. Activities which, for which there is no unmet recovery need or which do not tie back to a qualified disaster are also ineligible activities and cannot be funded with CDBG-NDR funds.

Meg Barclay: So, I just want to run, jump in there and clarify again. So, you could have an activity that's eligible under one of the statutes or regs that's stated under number one on this slide, but if it has not tieback to the qualified disaster, it would not be eligible for funding under this NOFA. Is that correct?

Makani Drummond: That's right, thanks, Meg.

Meg Barclay: Just checking.

Makani Drummond: 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 is also not permitted. That is, it is ineligible under the NDRC, except that funds may be used to reimburse costs of NDR grant application preparation, planning and citizen outreach activities. Any activity that's not in compliance with applicable fair housing and civil rights laws and regulations is also an ineligible activity. Projects dependent on contingent action to be effective or feasible, and projects which are feasible and/or not effective at significantly reducing the risk against the threats and hazards for which the project was designed will also be ineligible activities, and not eligible for CDBG-NDR funding.

Projects for temporary measures, including those that are designed solely to prepare for future needs and not to address a recovery need of a qualified disaster are not eligible for NDR assistance. These are ineligible activities. There are examples of temporary measures provided in the NDRC NOFA and they're included in Appendix A. Response activities, equipment and training activities are also ineligible activities under the National Disaster Resilience Competition. Finally, project sites which are located within special flood hazard areas are not eligible for NDR funding and assistance if the



jurisdiction is not participating in FEMA's National Flood Insurance Program. These would be ineligible activities.

While the notice and appendices and the statutes and regulations that we've discussed up until this point describe eligible and ineligible activities, applicants can apply for eligibility waivers through the National Disaster Resilience Competition. These waivers would provide additional flexibility to the NDRC and are in place to allow full and swift resilient disaster recovery. The Secretary's waiver authority for the NDRC is derived from the Disaster Relief Appropriations Act of 2013. And, throughout this competition, throughout the competition, the Secretary can grant waivers to add new eligible activities 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. Waiver requests necessary to carry out an activity described in an application must be submitted with that application, either Phase 1 or Phase 2. And, when submitting a Phase 1 application, applicants should submit requests for any waivers anticipated to be necessary at the time of their submission for any activities that they reference in their application, in their Phase 1 application. We do, however, recognize that changes to a project's funding structure design may require changes to the proposed CDBG eligible activities where modification to a waiver or alternative requirement that was previously requested. Therefore, applicants can submit Phase 2 applications with both new waiver requests and requests to modify previous waiver requests. Applicants that would like to seek a waiver request should refer to Appendix E of the NDRC NOFA. Appendix E describes the process of requesting waivers. It's important to note, though, that waivers even if requested may not be approved, and even if approved, HUD may impose additional alternative requirements.

There are a variety of additional resources available to applicants on the topics of threshold requirements, eligible and ineligible activities. Applicants are encouraged to refer to Grants.gov for the NDRC NOFA itself and all the supporting document to HUD Exchange, the NOFA website on HUD Exchange, where applicants can get access to other webinar recordings and other resources; to HUDUser.org for additional data resources; and the Resilient Recover website on HUD Exchange for resources and research on data, disaster resilience. Finally, if applicants have any questions that haven't been covered by the webcast or any of the resources available, you're encouraged to submit your questions to HUD at [ResilientRecovery@HUD.gov](mailto:ResilientRecovery@HUD.gov).

Meg Barclay: Thanks, Makani. That concludes today's webcast of the Community Development Block Grant National Disaster Resilience Competition, NDRC, describing thresholds and eligible and ineligible activities under this NOFA. Thanks, Makani.

Makani Drummond: Thank you.