

Housing Programs: Homeowner and Rental Rehabilitation

Program Design and Implementation Considerations

AGENDA

- CDBG-DR Housing—Why?
- Housing Requirements
- CDBG-DR Housing Program Lifecycle

SUPPORT HOUSING WITH CDBG-DR—WHY?

- Rehabilitation/reconstruction programs can be essential long-term recovery components when a community has a large proportion of damaged residential properties whose units are:
 - Largely owned by underinsured or uninsured low- to moderate-income (LMI) households
 - Rental properties that contribute to the affordable housing stock
- Using Community Development Block Grant—Disaster Recovery (CDBG-DR) funds for housing is common and encouraged, but grantees must develop policies and procedures to ensure housing programs are conducted per CDBG-DR or CDBG—Mitigation (CDBG-MIT) regulations
 - When establishing a program, many decisions will impact how the program is implemented and how it remains in compliance with the federal regulations.

(SOME) HOUSING REQUIREMENTS

- Construction standards
 - New construction permitted in accordance with rehabilitation assistance described in 24 CFR 570.202.
 - Green and Resilient Building Standards for new construction, reconstruction, and rehabilitation.
 - HUD Green Building Retrofits (non-substantial rehabilitation)
 - Elevation of at least 2' above the 1% annual flood chance
 - Broadband infrastructure (new construction over 4 units, reconstruction or substantial rehabilitation)
- Affordability period for new construction rental and for-sale, enforceable by deed, covenants, or other similar mechanisms.
 - Between 5 and 20 years based on level of assistance per unit (HOME safe harbor)
 - Action Plan or substantial amendment must include resale/recapture provisions
 - No required affordability period for rehabilitation/reconstruction of existing homes
- Uniform Relocation Act—relocation benefits
 - Owner-occupants are not considered “displaced” but tenants are
- Single-family unit—includes 1 to 4 units.
- Flood insurance—required if located in a 100-year floodplain (special flood hazard area) and include notice to future owners.

HOUSING REHABILITATION PROGRAM LIFECYCLE

Program Design and Launch



Intake, Eligibility, and Award



Construction



Closeout

Program Design and Launch

Step 1: Program Design

Step 2: Policies & Procedures

Step 3: Identify contractors/
subrecipients

Step 4: Community Outreach

Environmental Tier 1's should be completed during initial program design and launch.

Financial, data, and general program management process get established during initial program design and launch.

Intake, Eligibility and Award

Step 5: Application Intake

Step 6: QA/QC of Files & Documentation

Step 7: Eligibility Determination

Step 8: Environmental Review

Step 9: Damage Inspection (WIP & Remaining Scope)

Step 10: Duplication of Benefits Analysis

Step 11: Award Determination

Step 12: Award Closing & Subrogation Agreement Signing

Construction

Step 13: Construction/Construction Management



Step 14: C of O

Tenant Income
Certification

Closeout

Step 15: Grant Reconciliation and Closeout

PROGRAM DESIGN NEXT STEPS

- Assess your capacity and experience.
- Outline pending program design decisions and make recommendations to leadership on each (see Program Design Matrix).
- Identify needed staff, partners, and vendors/contractors.
- Develop written program policies and procedures.
- Enter into subrecipient agreements/memorandums of understanding or procure support.

RESOURCES

- Disaster Recovery Homeowner Rehab Program Design Implementation Toolkit:
<https://www.hudexchange.info/programs/cdbgd-dr/toolkits/program-implementation/>
- *This toolkit links to 8 Homeowner Rehabilitation Implementation Tools*
- [87 FR 31636.pdf](#) (hud.gov)—Notice for 1st allocation (\$98,701,000)