

Consolidated Plan Updates to Reflect Disaster Recovery Needs and Associated Priorities

Background

The Department requires each grantee in receipt of Community Development Block Grant Disaster Recovery (CDBG-DR) funds to update its full consolidated plan within a certain period of time following the disaster, as described in the table below.

The Department provides CDBG-DR grantees with a waiver for the requirement for consistency with the consolidated plan (requirements at 42 U.S.C. 12706, 24 CFR 91.325(a)(5), 24 CFR 91.225(a)(5), 24 CFR 91.325(b)(2), and 24 CFR 91.225(b)(3)). However, as noted in each applicable **Federal Register** Notice, these waivers only apply until a certain point in time for all grantees in receipt of CDBG-DR funds under supplemental disaster relief appropriations.

The table below summarizes consolidated plan requirements for current CDBG-DR grantees and when each grantee's waiver would no longer apply.

DISASTER	APPLICABLE FEDERAL REGISTER NOTICE(S)	CONSOLIDATED PLAN CONSISTENCY – END OF WAIVER APPLICABILITY
Hurricane Sandy and other disasters occurring in 2011, 2012, and 2013	(78 FR 14329 (Published March 5, 2013); 78 FR 32262 (Published May 29, 2013); 78 FR 69104 (Published November 18, 2013); 78 FR 76154 (Published December 16, 2013); 79 FR 62182 (Published October 16, 2014)	When the grantee first updates its full consolidated plan. HUD expects grantees to update its full consolidated plan to reflect disaster-related needs no later than its Fiscal Year 2015 consolidated plan update.
Multiple Disasters - 2011	77 FR 22583 (Published April 16, 2012)	When grantee first updates its full consolidated plan more than 30 months following the disaster <i>(excepting non-entitlement communities, which have a different requirement as noted in Notice)</i>
Severe Storms and Flooding- 2010	75 FR 69097 (Published November 10, 2010); 76 FR 20998 (Published April 14, 2011)	When grantee first updates its strategic plan priorities (and the full consolidated plan) following the disaster.
Multiple Disasters- 2008	74 FR 7244 (Published February 13, 2009); 73 FR 77818 (Published December 19, 2008); 73 FR 52870 (Published September 11, 2008); 74 FR 41146 (Published August 14, 2009)	When grantee first updates its consolidated plan priorities following the disaster.
Hurricanes Katrina, Rita, Wilma - 2005	73 FR 46312 (Published August 8, 2008); 71 FR 7666 (Published February 13, 2006)	When grantee first updates its consolidated plan priorities following the disaster
Multiple Disasters-2003/2004	69 FR 72100 (Published December 10, 2004)	When the grantee first updates its consolidated plan following the disaster.
World Trade Center- 2001	67 FR 36017 (Published May 22, 2002); 76 FR 52340 (Published August 22, 2011)	Waiver does not expire

In order to assist grantees in meeting this requirement, HUD is providing step-by-step instructions to assist grantees to fulfill this requirement in HUD’s eCon Planning Suite.

When the organization administering the CDBG–DR award is a different entity or agency from that which administers the applicable State’s or entitlement’s annual CDBG program, these entities should coordinate to ensure that the grantee updates its consolidated plan according to these instructions.

Incorporating CDBG-DR funds into Consolidated Plans in the eCon Planning Suite

1. Add CDBG-DR as a source on the Anticipated Resources Screen (SP-35)

Step 1: select “Add” next to the bottom resource on the table on SP-35 as shown in Figure 1 below.

Figure 1

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

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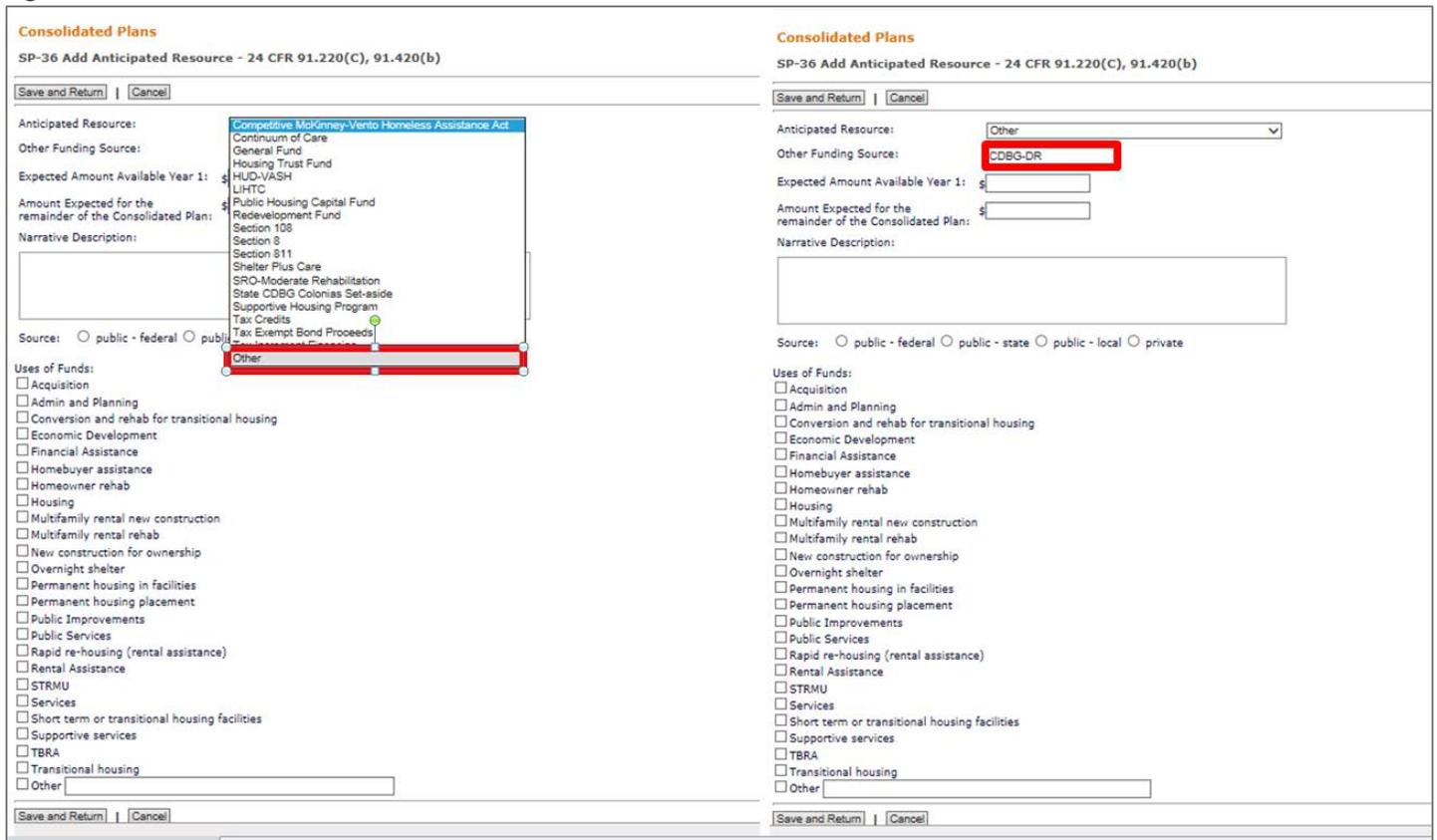
Introduction:

Source of Funds	Source	Uses of Funds	Expected Amount Available Year 1	Expected Amount Available Remainder of Con Plan	Narrative Description	Action
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$ 0	\$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$ 0	\$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$ 0	\$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$ 0	\$		Add

Step 2: on the next screen (SP-36) select “Other” from the “Anticipated Resources” drop-down Menu. Then Enter “CDBG-DR” for “Other Funding Source” as shown in Figure 2 below. Then complete the rest of the screen.

- Grantees should fill in the “Expected Amount Available for Year 1” to reflect the estimated amount of CDBG-DR funding they expect to obligate and expend during FY 2015.
- Grantees should fill in the “Amount Expected for the remainder of the Consolidated Plan” to reflect the estimated amount of CDBG-DR funding they expect to obligate and expend during the remainder of the Con Plan period.

Figure 2



2. Housing and Homeless Needs Assessment (91.205)

- Grantees should insert language from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan for disaster recovery to integrate into Consolidated Plan comments for this section. As there is extensive information in CDBG-DR Action Plans on recovery needs, grantees should include only an abbreviated version of this information related to impact and recovery needs related to housing and homelessness, infrastructure and economic development on the following screens in the Consolidated Plan template:
 - Housing needs – NA-10
 - Homeless needs – NA-40
 - Infrastructure and economic development needs – NA-50

This information can be included by adding a supplemental text box on any of these screens, as appropriate.

3. Housing Market Analysis (91.210)

- Grantees should insert language from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan to integrate in the Housing Market Analysis section of the Consolidated Plan. As there is extensive information in CDBG-DR Action Plans on recovery needs, grantees should include only an abbreviated version of this information related to grantee’s analysis of its housing market.
 - Number of Housing units – MA-10
 - Cost of Housing – MA-15
 - Condition of Housing – MA-20

- Needs and Market Analysis Discussion – MA-50

This information can be included by adding a supplemental text box on any of these screens, as appropriate.

4. Reflect Goals to be accomplished with CDBG-DR funding on the SP-45 screen.
 - This can be done by either 1) creating one goal that will encompass all accomplishments anticipated to result from the CDBG-DR program during the Strategic Planning Period, or 2) by folding anticipated CDBG-DR accomplishments into other program goals on this screen.
 - Annual goals for CDBG-DR during Year 1 should also be included on the AP-20 screen in the Year 1 Annual Action Plan embedded in the Consolidated Plan template and in subsequent year Annual Action Plans carried out during the Strategic Planning period.
5. Projects for CDBG-DR should not be created on the AP-35 screen
 - Reference CDBG-DR allocation priorities in the text box on this screen, as shown in Figure 3 below, and provide a link to the grantee’s website where its CDBG-DR Action Plan is posted as a resource for parties that wish to find out more.

Figure 3

Annual Action Plan (2013-Draft)
AP-35 Projects - 91.220(d)

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* Indicates Required Field
* Introduction:

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Projects
No Projects have been added to this Annual Action Plan.
Add an Existing Project

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs:

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