

# CDBG-DR Admin Action Plan for All Grantees Subject to the Universal Notice

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## HUD's Office of Disaster Recovery Review Checklist

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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
**Office of Disaster Recovery**

## Table of Contents

General Information for Admin Action Plan Review .....	2
Criteria for Approval of Admin Action Plan .....	2
Certifications Checklist for Admin Action Plan .....	4

General Information for Admin Action Plan Review

<b>Admin Action Plan HUD Review Checklist for CDBG-DR Grants Subject to the Universal Notice</b>	
Grantee Name:	
Date Plan Submitted:	
Total Grant Amount:	
Total Amount of Program Administrative Costs (PACs) Budgeted: <i>(Cannot exceed 5% of Total Grant Amount)</i>	
Grantee Contact (Name):	
Grantee Contact (Email/Phone):	
HUD Reviewer (Name):	
HUD Reviewer (Email/Phone):	

Criteria for Approval of Admin Action Plan

<b>Criteria for Approval of Admin Action Plan:</b>	<b>Yes</b>	<b>If yes, provide supporting evidence (e.g., citation/page number, link to website)</b>	<b>No</b>
<b>A. Proposed Allocation of Funds</b>			
1. Did the grantee list all proposed uses of funds for PACs that may be incurred before the date of approval of the Action Plan?  <i>REMINDER: Program administrative costs (PACs) are reasonable general costs, including carrying charges, of grant management that do not include staff and overhead costs directly related to carrying out other CDBG-DR eligible activities, since those costs are eligible as part of such activities.</i>	<input type="checkbox"/>		<input type="checkbox"/>
2. Are the grantee’s proposed activities for the use of funds for PACs eligible activities?  <i>NOTE: Activities listed at Section 105(a)(13) of the HCDA and at 24 CFR 570.206 are considered eligible. HUD reviewers may also consult <a href="#">Notice CPD-2023-06</a> when making this determination.</i>	<input type="checkbox"/>		<input type="checkbox"/>

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<p>3. Did the grantee include the amount(s) budgeted for PACs?</p> <p><i>NOTE: The grantee cannot budget more than 5% of the total grant amount for PACs.</i></p>	<input type="checkbox"/>		<input type="checkbox"/>
<b>B. Publication of the Admin Action Plan</b>			
<p>4. Is the Admin Action Plan, including any substantial amendments to the Admin Action Plan, prominently posted on the grantee’s official disaster recovery website?</p>	<input type="checkbox"/>		<input type="checkbox"/>
<b>C. Standard Form 424 (SF-424)</b>			
<p>5. Did the grantee provide a completed SF-424 when submitting its Admin Action Plan?</p>	<input type="checkbox"/>		<input type="checkbox"/>
<b>D. Certifications</b>			
<p>6. Did the grantee complete and provide all the certifications outlined in the Certifications Checklist on the following pages?</p>	<input type="checkbox"/>		<input type="checkbox"/>
<p><b>Has the grantee met all the above Admin Action Plan criteria for approval?</b></p>	<input type="checkbox"/>		<input type="checkbox"/>
<p><b>Describe the basis for your conclusion below:</b></p>			

### Certifications Checklist for Admin Action Plan

<p><b>Each grantee receiving an allocation subject to the Universal Notice must make the following certifications (as outlined in Appendix A of the Universal Notice) when submitting an Admin Action Plan to HUD:</b></p>		<p><b>Check each box below if the grantee completed and submitted the corresponding certification:</b></p>
<p><b>a. Compliance with Anti-discrimination Laws</b></p>	<p>The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.</p>	<input type="checkbox"/>
<p><b>b. Affirmatively Further Fair Housing</b></p>	<p>The grantee certifies that it will affirmatively further fair housing.</p>	<input type="checkbox"/>
<p><b>c. Anti-Lobbying</b></p>	<p>The grantee certifies its compliance with restrictions on lobbying required by 24 CFR 87, together with disclosure forms, if required by part 87.</p>	<input type="checkbox"/>
<p><b>d. Authority of Grantee</b></p>	<p>The grantee certifies that the Admin Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.</p>	<input type="checkbox"/>
<p><b>e. Consistency with the Action Plan</b></p>	<p>The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its Admin Action Plan.</p>	<input type="checkbox"/>
<p><b>f. Citizen Participation</b></p>	<p>The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).</p>	<input type="checkbox"/>

<p><b>g. Use of Funds</b></p>	<p>The grantee certifies that it is complying with each of the following criteria:</p> <p>(1) Purpose of the Funds. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).</p> <p>(2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Admin Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.</p> <p>(3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.</p> <p>(4) Special Assessment. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) the grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).</p>	<div style="background-color: black; height: 50px; width: 100%;"></div> <div style="border: 1px solid black; height: 100px; width: 100%; text-align: center; vertical-align: top;"> <input type="checkbox"/> </div> <div style="border: 1px solid black; height: 100px; width: 100%; text-align: center; vertical-align: top;"> <input type="checkbox"/> </div> <div style="border: 1px solid black; height: 100px; width: 100%; text-align: center; vertical-align: top;"> <input type="checkbox"/> </div> <div style="border: 1px solid black; height: 100px; width: 100%; text-align: center; vertical-align: top;"> <input type="checkbox"/> </div>
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<p><b>h. Excessive Force</b></p>	<p>The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:</p> <p>(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and</p> <p>(2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.</p>	<div style="background-color: black; height: 100px; width: 100%;"></div>
<p><b>i. Grant Timeliness</b></p>	<p>The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.</p>	<input type="checkbox"/>
<p><b>j. Environmental Requirements</b></p>	<p>The grantee certifies that it will comply with environmental requirements at 24 CFR 55 (as applicable) and 24 CFR 58.</p>	<input type="checkbox"/>
<p><b>k. Compliance with Laws</b></p>	<p>The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.</p>	<input type="checkbox"/>

*Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.*

*This checklist is part of the administrative record of the Department's review of an Admin Action Plan submitted pursuant to the requirements of the Universal Notice and the applicable Allocation Announcement Notice. In using the checklist, reviewers are reminded that each of the criterion as stated on the checklist is necessarily an abbreviated and generalized summary of the more detailed requirements outlined in the Federal Register notice(s) for each criterion. Reviewer answers to each question on the checklist must be informed by applying the requirements of each criterion as outlined in the Federal Register notice(s) to each element of the Admin Action Plan. Use of the checklist does not substitute comparison of the Admin Action Plan submission against the requirements of the applicable Federal Register notice(s) and making a determination based on the Standard of Review set forth in 24 CFR 91.500, as augmented by the applicable notice(s).*