**Universal Notice Admin Action Plan Guide and Template**

**HUD’s Office of Disaster Recovery Guide and Template Resource**

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**Introduction**

Historically, CDBG-DR appropriations acts authorize up to five percent of a grant (plus five percent of program income generated by the grant) to be used for program administrative costs by the grantee, local governments, or subrecipients. As further outlined in [Notice CPD-2023-06](https://www.hud.gov/sites/dfiles/OA/images/2023-06cpdn.pdf), **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.

Recent CDBG-DR appropriations acts have allowed grantees to access funding for PACs prior to the Secretary’s certification of financial controls and procurement processes, and adequate procedures for proper grant management. However, appropriations acts typically require that all CDBG-DR funds be used pursuant to an action plan. For CDBG-DR grants subject to the Universal Notice, section I.B. of the Universal Notice outlines the process for submitting an Admin Action Plan to HUD to access funds for PACs prior to the award of the full grant. If a grantee chooses to access these funds prior to the Secretary’s certification, it must first prepare an Admin Action Plan that describes its proposed use of the funds.

Although not required, grantees may choose to use this template to complete the Admin Action Plan as the template includes the necessary steps and components of the Admin Action Plan submission process to meet the Universal Notice’s requirements.

There is no due date for the Admin Action Plan as it is optional and may be submitted any time prior to the grantee’s Action Plan. HUD will review the Admin Action Plan (or substantial amendment to the plan) within 15 calendar days from the date of receipt and determine whether to approve the Admin Action Plan per the criteria identified in the Universal Notice.

The purpose of this document is to provide an optional template for Community Development Block Grant Disaster Recovery (CDBG-DR) grantees receiving an allocation subject to the Universal Notice to submit an Admin Action Plan (also known as an “Optional Action Plan for Program Administrative Costs”).

**How to Use this Guide and Template**

The Office of Disaster Recovery has created this resource for grantees as a supplemental tool to the Universal Notice and applicable Allocation Announcement Notices (AAN). This tool is an optional resource, and Grantees are not required to use this Universal Notice Admin Action Plan Guide and Template in the development of their initial Admin Action Plan. Grantees should delete all of the instruction boxes and “lightbulb text boxes” before publishing their Asmin Action Plan on its disaster recovery website.

This guide contains the following components:

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| Instructions: |
| Throughout this document, all of the instruction prompts will be signified by a callout box identical to the design here. The remainder of the content is established for grantees to adapt and adjust for their Action Plan and long-term disaster recovery needs. |



Lightbulb textboxes are designed to provide grantees with essential information, reminders, tips and context.

# Headings: The headings found in the Template section of this document provide grantees with the general headings they will need to incorporate into their Admin Action Plan.

Template Text: Template text is sample verbiage that a grantee may use in their Admin Action Plan.

Gray text boxes are designed to provide grantees with a description of the content that is required under each heading.

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| Tables: Tables are designed to assist grantees with communicating and formatting essential information. | |
| Table Information 1 | Some tables have blank spaces that prompt grantees to enter basic information. |
| Table Information 2 | Some tables are designed to instruct grantees on how to enter the correct information in the correct format. |

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# **Grantee Admin Action Plan Template**

This is where the document transitions into the template designed for grantee to update and modify to accommodate their own Admin Action Plan development. As explained above, grantees should delete each instruction box prior to moving their Admin Action Plan forward for submission to HUD.

# Grantee Cover Page

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| Instructions: |
| Grantees can develop their own unique branding for the Admin Action Plan cover page. |

# Table of Contents

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| Instructions: |
| Grantees can establish a table of contents to help guide the reader through the Admin Action Plan organization. |

# I. General Information for Admin Action Plan Submission

|  |  |
| --- | --- |
| **Grantee Name:** |  |
| **Date Plan Submitted:** | Click or tap to enter a date. |
| **Total Grant Amount:** | Enter value in terms of $ here. |
| **Total Amount of PACs Budgeted:** | This percentage cannot exceed 5% of the total allocation. |
| **Grantee Contact (Name):** |  |
| **Grantee Contact (Email/Phone):** |  |
| **HUD Contact (Name):** |  |
| **HUD Contact (Email/Phone):** |  |

# II. Proposed Allocation of Funds

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| Instructions: |
| List all proposed uses of funds for PACs that may be incurred before the date of approval of the Action Plan (including eligible pre-award PACs that the grantee plans to reimburse itself or its subrecipients), specify the criteria for eligibility of your proposed activities, and include the amount budgeted for each activity in the table below.  Grantees may include activities listed at Section 105(a)(13) of the HCDA and at 24 CFR 570.206. It is also important for grantees to remember that while all costs associated with developing the Action Plan can be assigned to PACs, grantees have the option of assigning certain costs as either planning costs or PACs as further detailed in [Notice CPD-2023-06](https://www.hud.gov/sites/dfiles/OA/images/2023-06cpdn.pdf). |

|  |  |  |  |
| --- | --- | --- | --- |
| **Program Administration Activity/Activities** | | **Criteria for Eligibility**  (e.g., 24 CFR 570.206(a)) | **Budget/Allocation** |
|  | |  | Enter value in terms of $ here. |
|  | |  | Enter value in terms of $ here. |
| ***Add additional rows as needed.*** | | … | … |
|  | ***Total*** | | This percentage cannot exceed 5% of the total allocation. |



*NOTE: When a grantee submits an Admin Action Plan, the grantee must consider the need to cover PACs over the life of the grant, which is six years from HUD’s signature on the initial grant agreement. Therefore, grantees are strongly encouraged to budget for these costs early in the grant lifecycle.*

# III. Publication of the Admin Action Plan

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| Instructions: |
| Normally, a grantee must publish any proposed action plan and substantial amendments to the plan for public comment. However, because the Admin Action Plan will only include PACs, and to allow for a more streamlined process and timely awarding of grants, no public comment period is required.  Grantees must publish the Admin Action Plan online when the plan is submitted to HUD. The manner of publication of the Admin Action Plan must include prominent posting on the grantee’s official disaster recovery website and includes any substantial amendments to the Admin Action Plan. |

Provide link to website with Admin Action Plan prominently posted and/or other evidence.

# IV. Standard Form 424 (SF-424)

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| Instructions: |
| When the grantee submits its Admin Action Plan or substantial amendment to the plan to HUD for approval, it must include the Standard Form 424 (SF-424). |

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| **Completed SF-424 attached** |  |

# V. Certifications

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| Instructions: |
| Each grantee receiving an allocation subject to the Universal Notice and choosing to submit an Admin Action Plan must complete the following certifications in Appendix A of the Universal Notice and submit them with the Admin Action Plan to HUD. |

**Certification in Appendix A of the Universal Notice include the following**:

1. **Compliance with Anti-discrimination Laws**: 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.
2. **Affirmatively Further Fair Housing**:The grantee certifies that it will affirmatively further fair housing.
3. **Anti-Lobbying**: The grantee certifies its compliance with restrictions on lobbying required by 24 CFR 87, together with disclosure forms, if required by part 87.
4. **Authority of Grantee**: 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.
5. **Consistency with the Action Plan**: The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its Admin Action Plan.
6. **Citizen Participation**: 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).
7. **Use of Funds**: The grantee certifies that it is complying with each of the following criteria:

(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*.).

(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.

(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.

(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).

1. **Excessive Force**: 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:

(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

(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.

1. **Grant Timeliness**: 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.
2. **Environmental Requirements**: The grantee certifies that it will comply with environmental requirements at 24 CFR 55 (as applicable) and 24 CFR 58.
3. **Compliance with Laws**: The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

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| **Completed certifications attached** |  |



*NOTE: A grantee must also make certifications included in Appendix B of the Universal Notice and submit them to HUD when it submits its Action Plan, which means some certification statements will be submitted twice*.

*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.*

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Signature of Certifying Official (Date)

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Printed Name of Certifying Official (Date)