# Consolidated Plan Updates to Reflect Disaster Recovery and Mitigation Needs and Associated Priorities

### **Background**

The Department requires each grantee in receipt of Community Development Block Grant Disaster Recovery (CDBG-DR) or CDBG Mitigation (CDBG-MIT) funds to update its full consolidated plan within a certain period of time following the disaster or the publication of a notice.

The Department provides CDBG-DR and CDBG-MIT 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 or CDBG-MIT funds under supplemental disaster relief appropriations.

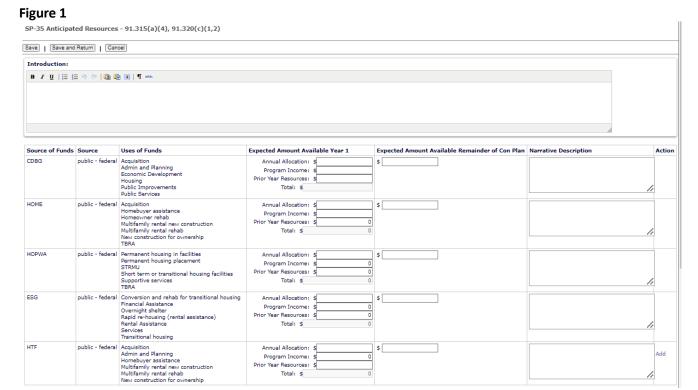
The table at the end of this document summarizes consolidated plan requirements for current CDBG-DR and CDBG-MIT grantees and when each grantee's waiver would no longer apply. In order to assist grantees in meeting this requirement, HUD is providing step-by-step instructions to assist grantees to fulfill this requirement in HUD's eCon Planning Suite.

When the organization administering the CDBG-DR or CDBG-MIT 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 and CDBG-MIT funds into Consolidated Plans in the eCon Planning Suite

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

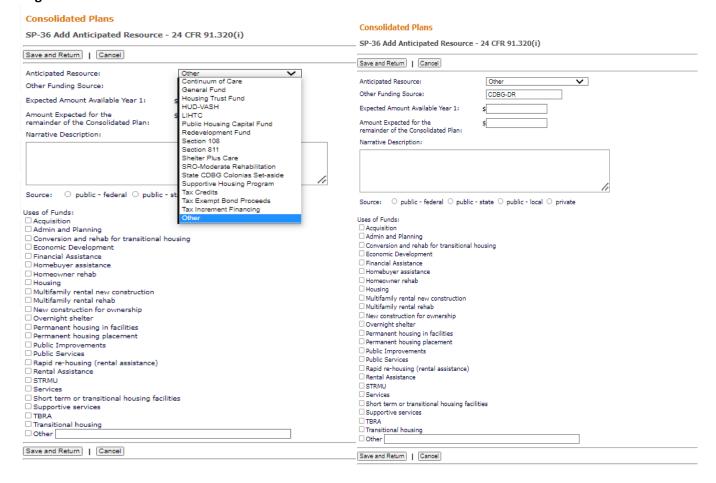
Step 1: select "Add" next to the bottom resource on the table on SP-35 as shown in Figure 1 below.



**Step 2:** on the next screen (SP-36) select "Other" from the "Anticipated Resources" drop-down Menu. Then Enter "CDBG-DR" or "CDBG-MIT" 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 or CDBG-MIT funding they expect to obligate and expend during the FY.
- Grantees should fill in the "Amount Expected for the remainder of the Consolidated Plan" to reflect the
  estimated amount of CDBG-DR or CDBG-MIT 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 HUDapproved CDBG-DR Action Plan for disaster recovery to integrate into Consolidated Plan comments for this
  section, or include language from the "mitigation needs assessment" section of their HUD-approved CDBG-MIT
  Action Plan. As there is extensive information in CDBG-DR or CDBG-MIT Action Plans on recovery or mitigation
  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)

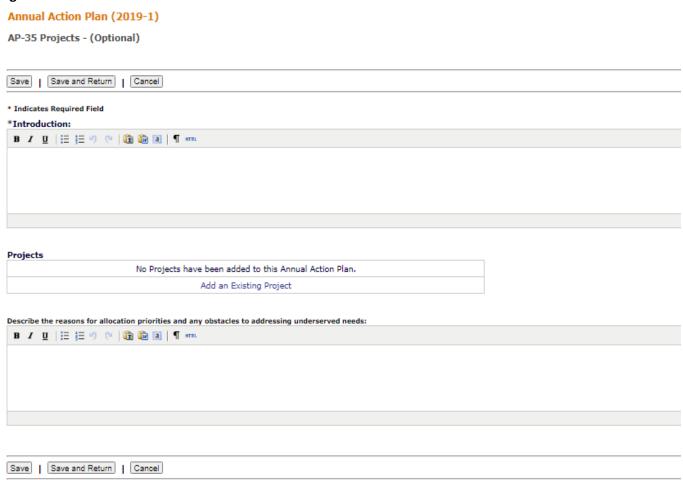
- Grantees should insert language from the "impact and unmet needs assessment" or "mitigation needs
  assessment" section of their HUD-approved CDBG-DR or CDBG-MIT Action Plan to integrate in the Housing
  Market Analysis section of the Consolidated Plan. As there is extensive information in CDBG-DR and CDBG-MIT
  Action Plans on recovery or mitigation 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 or CDBG-MIT 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 or CDBG-MIT program during the Strategic Planning Period, or 2) by folding
    anticipated CDBG-DR or CDBG-MIT accomplishments into other program goals on this screen (HUD
    recommends option 2 so grantees do not have to go back to the year-one ConPlan's Strategic Plan (SP)
    screens).
  - Annual goals for CDBG-DR or CDBG-MIT 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 or CDBG-MIT should not be created on the AP-35 screen
  - Reference CDBG-DR or CDBG-MIT allocation priorities in the <u>text box</u> on this screen, as shown in Figure 3 below, and provide a link to the grantee's website where its CDBG-DR or CDBG-MIT Action Plan is posted as a resource for parties that wish to find out more.

Figure 3



DISASTER	APPLICABLE FEDERAL REGISTER NOTICE(S)	CONSOLIDATED PLAN CONSISTENCY – END OF
DISASTER	AT LICABLE TEDENAL REGISTER NO TICE(S)	WAIVER APPLICABILITY
2020-2022	88 FR 32046 (Published May 18, 2023); 88 FR	87 FR 6364 (Published February 3, 2022):
Events	3198 (Published January 18, 2023); 87 FR	If the grantee is not scheduled to submit a new
	36869 (Published June 21, 2022); 87 FR	three-to five-year consolidated plan within the
	31636 (Published May 24, 2022); 87 FR 6364	next two years, the grantee must update its
	(Published February 3, 2022)	existing three-to five-year consolidated plan to
		reflect disaster-related needs no later than 24
		months after the applicability date of the
		grantee's applicable Allocation Announcement
		Notice (February 8, 2024).
2017-2019	87 FR 75644 (Published December 9, 2022);	85 FR 4681 (Published January 27, 2020):
Events	87 FR 36869 (Published June 21, 2022); 86 FR	Grantees are encouraged to incorporate disaster-
	569 (Published January 6, 2021); 85 FR 60821	recovery needs into their consolidated plan
	(Published September 28, 2020); 85 FR 50041	updates as soon as practicable, but any unmet
	(Published August 17, 2020); 85 FR 10182	disaster-related needs and associated priorities
	(Published February 21, 2020); 85 FR 4681	must be incorporated into the grantee's next
	(Published January 27, 2020); 84 FR 4836	consolidated plan update no later than its Fiscal
	(Published February 19, 2019); 83 FR 40314	Year 2020 update for 2017 disasters and Fiscal
	(Published August 14, 2018); 83 FR 5844	Year 2022 for 2018 and 2019 disasters.
	(Published February 9, 2018)	
Louisiana Floods	85 FR 60821 (Published September 28, 2020);	81 FR 83254 (Published November 21, 2016):
and Other 2016	85 FR 50041 (Published August 17, 2020); 84	If the grantee is not scheduled to submit a new
Events	FR 4836 (Published February 19, 2019); 82 FR	3–5 year consolidated plan within the next 2
	36812 (Published August 7, 2017); 82 FR 5591	years, HUD expects each grantee to update its
	(Published January 18, 2017); 81 FR 83254	existing 3–5 year consolidated plan to reflect
	(Published November 21, 2016)	disaster related needs no later than 24 months
		after the effective date of this notice (November
		28, 2018). Additionally, grantees are encouraged
		to incorporate disaster-recovery needs into their
		consolidated plan updates as soon as practicable,
		but any unmet disaster related needs and
		associated priorities must be incorporated into
		the grantee's next consolidated plan update no
		later than its Fiscal Year 2019 update.
CDBG-MIT for	86 FR 561 (2018 CDBG-MIT) (Published	86 FR 561 (2018 CDBG-MIT) (Published January 6,
2015-2018	January 6, 2021); 85 FR 4676 (CDBG-MIT	<u>2021):</u>
Events	Allocation for Puerto Rico) (Published January	For a grantee allocated CDBG- MIT funds under
	27, 2020); 84 FR 47528 (CDBG-MIT Allocation	Public Law 116–20, this waiver applies only until
	for USVI) (Published September 10, 2019); 84	a grantee submits its next full (3–5 year)
	FR 45838 (CDBG-MIT Main Notice) (Published	consolidated plan, or no later than its Fiscal Year
	August 30, 2019)	2022.
		84 FR 45838 (CDBG-MIT Main Notice) (Published
		August 30, 2019):
		This waiver applies only until the grantee submits
		its next full (3–5 year) consolidated plan, or for 24
		months after the applicability date of this notice,
		whichever is sooner (September 4, 2021).

Hurricane	85 FR 60821 (Published September 28, 2020);	81 FR 39687 (Published June 17, 2016):
Joaquin,	85 FR 50041 (Published August 17, 2020); 84	If the grantee is not scheduled to submit a new
Hurricane	FR 4836 (Published February 19, 2019); 82 FR	3–5 year consolidated plan within the next 2
Patricia, and	36812 (Published August 7, 2017); 81 FR	years, HUD expects each grantee to update its
Other Flood	39687 (Published June 17, 2016)	existing 3–5 year consolidated plan to reflect
Events Occurring		disaster-related needs no later than 24 months
in 2015		after the effective date of this notice (June 22,
		2018). Additionally, grantees are encouraged to
		incorporate disaster-recovery needs into their
		consolidated plan updates as soon as practicable,
		any unmet disaster-related needs and associated
		priorities must be incorporated into the grantee's
		next consolidated plan update no later than its
		Fiscal Year 2017 update.
Hurricane Sandy	85 FR 60821 (Published September 28, 2020);	78 FR 14329 (Published March 5, 2013):
and other	84 FR 4836 (Published February 19, 2019); 82	If not already completed, HUD expects grantees
disasters	FR 61320 (Published December 27, 2017); 82	to update their full consolidated plan to reflect
occurring in	FR 36812 (Published August 7, 2017); 82 FR	disaster-related needs no later than its Fiscal Year
2011, 2012, and	9753 (Published February 8, 2017); 81 FR	2015 consolidated plan update.
2013	54114 (Published August 15, 2016); 81 FR	
	36557 (Published June 7, 2016); 81 FR 7567	
	(Published February 12, 2016); 80 FR 72102	
	(Published November 18, 2015); 80 FR 51589	
	(Published August 25, 2015); 80 FR 26942	
	(Published May 11, 2015); 80 FR 17772	
	(Published April 2, 2015); 80 FR 1039	
	(Published January 8, 2015); 79 FR 62182	
	(Published October 16, 2014); 79 FR 60490	
	(Published October 7, 2014); 79 FR 40133	
	(Published July 11, 2014); 79 FR 31964	
	(Published June 3, 2014); 79 FR 17173	
	(Published March 27, 2014); 78 FR 76154	
	(Published December 16, 2013); 78 FR 69104	
	(Published November 18, 2013); 78 FR 52560	
	(Published August 23, 2013); 78 FR 46999	
	(Published August 2, 2013); 78 FR 45551	
	(Published July 29, 2013); 78 FR 32262 (Published May 29, 2013); 78 FR 23578	
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	(Published April 19, 2013); 78 FR 14329	
Multiple	(Published March 5, 2013) 84 FR 4836 (Published February 19, 2019); 77	77 FR 22583 (Published April 16, 2012):
Disasters - 2011	FR 60708 (Published October 4, 2012); 77 FR	While grantees are encouraged to incorporate
D1303(C13 - 2011	22583 (Published April 16, 2012)	disaster recovery needs into their consolidated
	22333 (1 donistica Aprili 10, 2012)	plan updates as soon as practicable, any unmet
		disaster-related needs and associated priorities
		should be incorporated into the grantee's next
		consolidated plan update following the expiration
		of the 30-month waiver period. Note that the 30-
		month requirement does not apply to any non-
		entitlement community receiving funds under

this Notice.

Severe Storms and Flooding - 2010	76 FR 20998 (Published April 14, 2011); 75 FR 69097 (Published November 10, 2010)	75 FR 69097 (Published November 10, 2010): When grantee first updates its strategic plan priorities (and the full consolidated plan) following the disaster.
Multiple Disasters- 2008	75 FR 65368 (Published October 22, 2010); 74 FR 41146 (Published August 14, 2009); 74 FR 7244 (Published February 13, 2009); 73 FR 77818 (Published December 19, 2008); 73 FR 52870 (Published September 11, 2008)	73 FR 52870 (Published September 11, 2008): When grantee first updates its consolidated plan priorities following the disaster.
Hurricanes Katrina, Rita, Wilma - 2005	74 FR 56206 (Mississippi) (Published October 30, 2009); 73 FR 75733 (Mississippi) (Published December 12, 2008); 73 FR 61148 (Louisiana) (Published October 15, 2008); 73 FR 58612 (Alabama) (Published October 7, 2008); 73 FR 46312 (Published August 8, 2008); 72 FR 70472 (Louisiana) (Published December 11, 2007); 72 FR 61788 (Mississippi) (Published October 31, 2007); 72 FR 48804 (Published August 24, 2007); 72 FR 48808 (Mississippi) (Published August 24, 2007); 72 FR 10014 (Louisiana) (Published March 6, 2007); 72 FR 10020 (Mississippi) (Published March 6, 2007); 71 FR 63337 (Published October 30, 2006); 71 FR 62372 (Mississippi) (Published October 24, 2006); 71 FR 51678 (Florida) (Published August 30, 2006); 71 FR 43622 (Texas) (Published August 1, 2006); 71 FR 34448 (Alabama) (Published June 14, 2006); 71 FR 34451 (Louisiana) (Published June 14, 2006); 71 FR 7666 (Published February 13, 2006)	71 FR 7666 (Published February 13, 2006): When grantee first updates its consolidated plan priorities following the disaster
Multiple Disasters - 2003 - 2004	70 FR 21437 (Maryland) (Published April 26, 2005); 69 FR 72100 (Published December 10, 2004)	69 FR 72100 (Published December 10, 2004): When the grantee first updates its consolidated plan following the disaster.
World Trade Center- 2001	82 FR 4911 (Published January 17, 2017); 76 FR 52340 (Published August 22, 2011); 69 FR 19211 (Published April 12, 2004); 68 FR 26640 (Published May 16, 2003); 67 FR 36017 (Published May 22, 2002); 67 FR 12042 (Published March 18, 2002); 67 FR 5845 (Published February 7, 2002); 67 FR 4164 (Published January 28, 2002)	67 FR 4164 (Published January 28, 2002): Waiver does not expire