

**Community Development Block Grant Disaster Recovery (CDBG-DR)  
 Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43), Continuing Appropriations Act,  
 2023 (Pub. L. 117-180), and Department of Housing and Urban Development Appropriations Act, 2023  
 (Pub. L. 117-328)  
 Implementation Plan HUD Review Checklist**

**Instructions:**

Each grantee receiving a direct allocation in these Notices must submit an Implementation Plan that demonstrates that it has sufficient capacity to manage the CDBG-DR funds and the associated risks. Grantees must evidence their management capacity through their implementation plan submissions. The Implementation Plan must describe the grantee’s capacity to carry out the recovery and how it will address any capacity gaps. HUD will determine that the grantee has sufficient management capacity to adequately reduce risk if the grantee submits Implementation Plan submissions that meet the criteria in section III.A.2. in Appendix B of the following notices: February 3, 2022 (87 FR 6377); May 24, 2022 (87 FR 31653); January 18, 2023 (88 FR 3217); May 18, 2023 (88 FR 32067), and as outlined below.

**Section I:**

Capacity Assessment

**Narrative:**

Review the Implementation Plan for the information below:

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes or No)
1.	Did the grantee identify the lead principal agency responsible for the implementation of the CDBG-DR award?	III.A.2.a.(1)	

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes or No)
2.	Did the grantee indicate that the head of the lead principal agency will report directly to the chief executive officer of the jurisdiction?	III.A.2.a.(1)	
3.	Did the grantee describe the assessment it conducted of its capacity to carry out recovery efforts?	III.A.2.a.(1)	
4.	Did the grantee include a timeline with milestones describing when and how the grantee will address all capacity gaps identified?	III.A.2.a.(1)	
5.	Did the grantee include a list of any open CDBG-DR findings and an update on the corrective actions underway to address each finding?  NOTE: HUD may include additional requirements in the grantee’s grant terms and conditions in order to prevent similar findings for this grant.	III.A.2.a.(1)	
	HUD REVIEWER COMMENTS:		

**Section II:**

Staffing

**Narrative:**

Review the Implementation Plan for the information below:

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes, No, or N/A (if allowable))
6.	An organizational chart of its department or division?	III.A.2.a.(2)	
7.	A table that clearly indicates which personnel or organizational unit will be responsible for each of the Financial Management and Grant Compliance Certification Requirements identified in section III.A.1.a. along with staff contact information, if available?  NOTES: III.A.1.a. would include personnel responsible for conducting DOB analysis, timely expenditure, website management, monitoring and compliance, and financial management.	III.A.2.a.(2)	
8.	Did the grantee include a list of personnel or identified positions for all of the following functions (a. through g. below)?	III.A.2.a.(2)	
9.	a. Case management, in proportion to applicant population?  NOTE: For example, grantees should identify their estimations of the anticipated applicant population and connect that to their plans for accurate case management.	III.A.2.a.(2)	
10.	b. Program managers who will be assigned responsibility for each primary recovery area (housing, economic revitalization, and infrastructure programs)?	III.A.2.a.(2)	

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes, No, or N/A (if allowable))
11.	c. Staff with experience in housing, economic revitalization, and infrastructure (as applicable)?	III.A.2.a.(2)	
12.	d. Staff responsible for procurement/contract management?	III.A.2.a.(2)	
13.	e. Staff responsible for regulations implementing Section 3 of the Housing and Urban Development Act of 1968, as amended (24 CFR part 75) (Section 3)?	III.A.2.a.(2)	
14.	f. Staff responsible for fair housing compliance?	III.A.2.a.(2)	
15.	g. Staff responsible for environmental compliance?	III.A.2.a.(2)	
16.	<p>Did the grantee demonstrate that an internal auditor and responsible audit staff report independently to the chief elected or executive officer or board of the governing body of any designated administering entity?</p> <p>NOTE: For example, grantees may submit an organizational chart that shows the internal auditor and staff report directly to an executive officer.</p>	III.A.2.a.(2)	
17.	Did the grantee describe how it will provide technical assistance for any personnel that are not employed by the grantee at the time of action plan submission?	III.A.2.a.(2)	
18.	Did the grantee describe how it plans to fill gaps in knowledge or technical expertise required for successful and timely recovery?	III.A.2.a.(2)	

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes, No, or N/A (if allowable))
19.	<p>FOR STATE GRANTEES ONLY: How the grantee plans to provide technical assistance to subgrantees and subrecipients, including units of general local government?</p> <p>NOTE: An N/A response here is available if the grantee is not a state.</p>	III.A.2.a.(2)	
	HUD REVIEWER COMMENTS:		

**Section III:**

Internal and Interagency Coordination

**Narrative:**

Review the Implementation Plan for the information below:

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes, No, or N/A (if allowable))
20.	Did the grantee describe how it will ensure effective communication between different departments and divisions within the grantee’s organizational structure that are involved in CDBG-DR-funded recovery efforts, mitigation efforts, and environmental review requirements, as appropriate?	III.A.2.a.(3)	
21.	Did the grantee describe how it will ensure communication between the lead agency and subrecipients responsible for implementing the grantee’s action plan (if applicable)?  NOTE: An N/A response here is available if the grantee is not using subrecipients.	III.A.2.a.(3)	
22.	Did the grantee describe how it will ensure effective communication with other local and regional planning efforts to ensure consistency?	III.A.2.a.(3)	
23.	Did the grantee’s submissions describe how it will consult with other relevant government agencies, including the State Hazard Mitigation Officer (SHMO), State or local Disaster Recovery Coordinator, floodplain administrator, and any other state and local emergency management agencies, such as public health and environmental	III.A.2.a.(3)	

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes, No, or N/A (if allowable))
	protection agencies, that have primary responsibility for the administration of FEMA or USACE funds?		
	HUD REVIEWER COMMENTS:		

**Section IV: Implementation Plan - Conclusion**

	<b>Questions</b>	<b>Notice Reference</b>	<b>HUD Reviewer Response</b> (Yes or No)
24.	<p>CONCLUSION – Has the grantee met all the requirements in the Implementation Plan checklist and outlined in section III.A.2. in Appendix B of the following notices: February 3, 2022 (87 FR 6377); May 24, 2022 (87 FR 31653); January 18, 2023 (88 FR 3217); and May 18, 2023 (88 FR 32067)?</p>	III.A.2.	
25.	<p>BASIS FOR CONCLUSION – Describe why the Implementation Plan submitted by the grantee meets or does meet the requirements?</p> <p>NOTE: For example, the grantee met all the requirements because the HUD reviewer was able to answer Yes to all the questions in the checklist or N/A if that option was available; or the grantee did not meet all the requirements because the HUD reviewer had to answer “No” to questions in the checklist (HUD reviewers should list those questions in their comments).</p> <p>HUD REVIEWER COMMENTS:</p>		