

CDBG-DR Program Overview

Recovery and Resilience after the Helene Disaster

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July 8, 2025



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Agenda

1. CDBG-DR Program Overview

- Purpose and goals

2. Eligible Projects

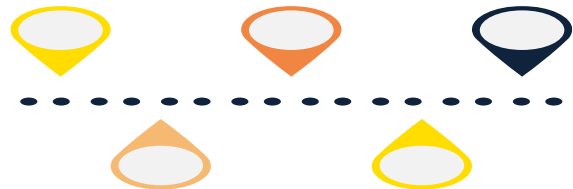
- Housing
- Infrastructure
- Economic revitalization

3. Sample Projects

- Real-world examples tied to the Helene Disaster
- LMI benefit and disaster tie-back illustrated

4. Key Considerations & Next Steps

- Environmental reviews
- Procurement
- Technical Assistance

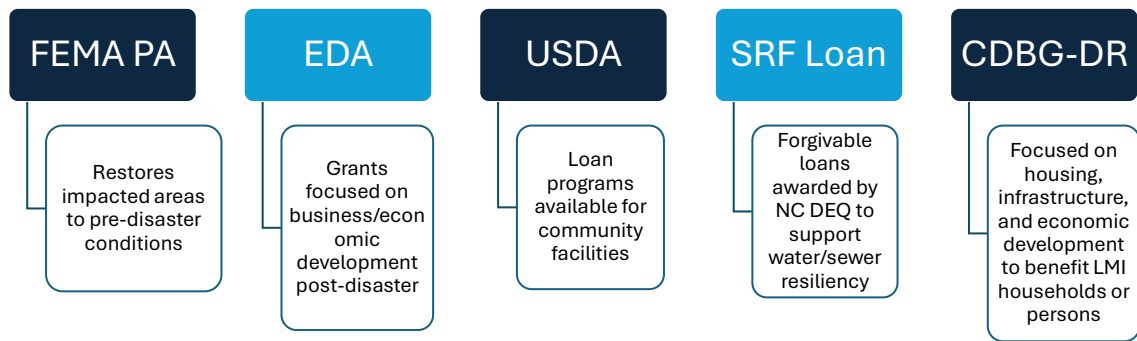


• Future Training Sessions

- **August:** Project Application Process
- **September:** Compliance Requirements

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Disaster Recovery Funding



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Community Development Block Grant - Disaster Recovery (CDBG-DR)

- Flexible federal grant funding to help communities recover from presidentially declared disasters—funding addresses unmet needs and promotes long-term resiliency
- The CDBG block grant regulations (24 CFR Part 570) apply to CDBG-DR. However, HUD may waive, modify, or add requirements for the specific disaster
- Eligible projects focus on housing, infrastructure, economic revitalization and mitigation
- CDBG-DR projects must generally benefit low- and moderate-income (LMI) persons, which include:
 - Households with incomes \leq 80% Area Median Income (AMI)
 - Projects serving areas where \geq 51% of residents are LMI

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Poll 1

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CDBG-DR Program for Hurricane Helene Recovery

Public Law 118-158

- Congress authorized \$12 B in CDBG-DR funds to aid in recovery efforts for federally declared disasters in 2023-2024

Universal Notice (90 FR 1754) – January 8, 2025

- Includes waivers and alternative requirements, regulatory requirements, award process, and eligible disaster recovery activities

Federal Register AAN (90 FR 4759) – January 16, 2025

- Appropriated the funding
- North Carolina: Total \$1.4B
 - \$1,241,843,000 (unmet recovery needs); \$86,277,000 (mitigation)
- Asheville: \$225M

“Revised Universal Notice” – March 19, 2025

- Memo 2025-02 updates the original Universal Notice to align with new executive orders

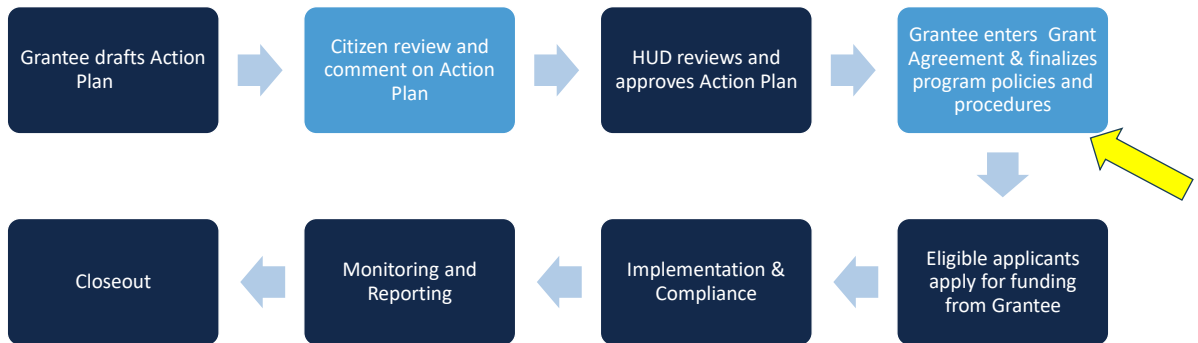
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Grantee Responsibilities & Grant Life-Cycle

North Carolina - \$1.428 billion

- 1,241,843,000 (unmet recovery needs)
- 186,277,000 (mitigation)

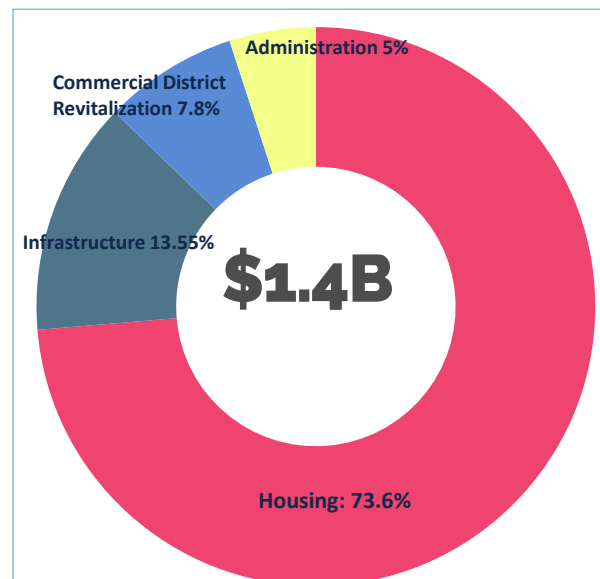
Grantee: NC Department of Commerce



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Funding Priorities

- **Housing Recovery: \$1B**
 - Reconstruction/Rehabilitation for Owner-Occupied Units (\$807M)
 - Workforce Housing (\$53M)
 - Multifamily Rental Housing (\$191M)
- **Infrastructure: \$193M**
- **Commercial District Revitalization: \$111M**
- **Administration: \$71M**



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CDBG-DR Program Overview

Program	Description	
 Reconstruction and rehabilitation for owner-occupied units	Funding for reconstruction or rehabilitation of owner-occupied units seriously damaged or destroyed by the effects of Hurricane Helene.	Housing
 Workforce housing for ownership	Funding for the construction of units for purchase by low- and moderate-income (LMI) households. ¹	
 Multifamily construction program	Funding to restore housing and promote new construction of multifamily housing in HUD-identified MID areas and will focus	
 Community infrastructure program	Funding for infrastructure projects that will help impacted communities become more resilient to current and future natural hazards.	Infrastructure
 Commercial district revitalization	Funding to carry out revitalization activities. Priority will be given to eligible applicants located in and serving HUD-identified MID areas.	Economic Development

¹ Low- and moderate-income households as defined by HUD
Source: NC Draft HUD Action Plan

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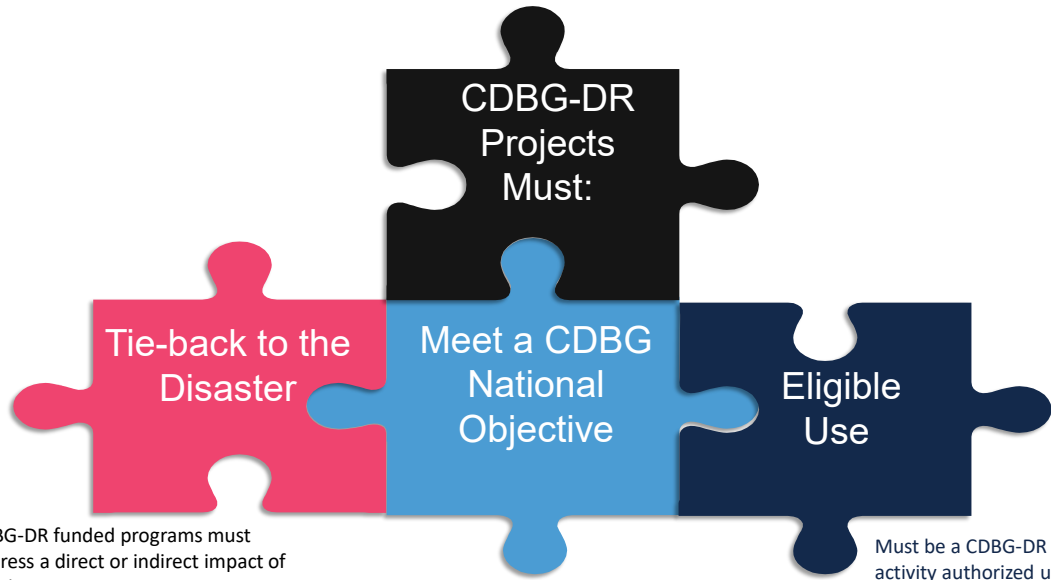
Most Impacted & Distressed Areas (“MID” Areas)

80% of the CDBG-DR funds must be spent in HUD-identified MID areas



*NCDOT expanded the HUD-Identified MID areas to include all of Caldwell, Cleveland, Madison, and Polk, and the entirety of these counties are considered HUD-identified MID areas.

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CDBG-DR funded programs must address a direct or indirect impact of the disaster

1. Benefit low-to-moderate income (LMI) persons (70% must benefit LMI)
2. Prevent or eliminate slums/blight (rarely used)
3. Address an urgent need

Must be a CDBG-DR eligible activity authorized under Section 105 of the Housing and Community Development Act (HCDA) or be allowed by waiver or alternative requirement

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Tie-Back to the Disaster



NCDOR will determine specific tie-back requirements for each program.



Examples of Direct Impacts	Documenting Connection to Disaster
Physical damage to housing	Sufficient documentation of physical loss or damage includes: <ul style="list-style-type: none"> • damage or rebuilding estimates, • insurance loss reports, • images, or • similar information that documents damage.
Physical damage to infrastructure	
Examples of Indirect Impacts	Documenting Connection to Helene
Housing <ul style="list-style-type: none"> • Loss of affordable housing stock • Increased homelessness because of displacement due to the disaster 	Housing: post-disaster housing analysis that describes the activities necessary to address the post-disaster housing needs
Infrastructure <ul style="list-style-type: none"> • Strained utilities and public infrastructure • Deterioration of roads and bridges 	
Commercial District Revitalization <ul style="list-style-type: none"> • Job loss due to decreased demand post-disaster • Business closures due to loss of customers 	Commercial District Revitalization: data about job loss or businesses closing or data on how pre-disaster economic stressors were aggravated by the disaster

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CDBG National Objectives

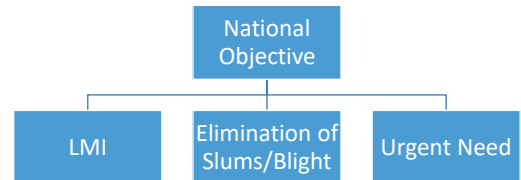
1. Benefit to Low-and Moderate-Income (LMI) Persons

- 70% of CDBG-DR funds must be spent on this objective

2. Prevention or Elimination of Slums or Blight - Activities aimed at revitalizing areas or buildings with clear physical deterioration. (*Rarely used for CDBG-DR)

3. Urgent Need – Activities that alleviate conditions created by and related to the declared disaster that do not fall under the LMI objective.

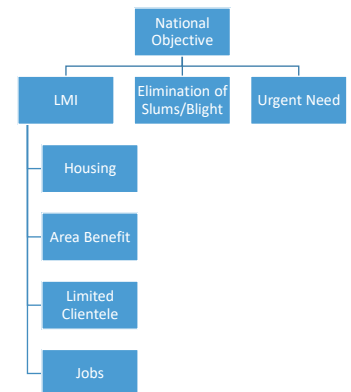
- The existing conditions must pose a serious and immediate threat to the health or welfare of the community;
- The existing conditions are of recent origin or recently became urgent (generally, within the past 18 months); and
- The grantee is unable to finance the activity on its own or through other sources of funding.



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Meeting the LMI National Objective

- Housing:** Activities undertaken for the purpose of providing or improving permanent residential structures to be occupied by LMI households.
- Area Benefit:** An area benefit activity is one that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons.
 - Acquisition of land to be used as a neighborhood park
 - Construction of a health clinic or community center
 - Improvements to public infrastructure like the installation of sidewalks
- Limited Clientele:** 51% of the beneficiaries must be LMI persons. To determine if an activity benefits LMI persons, the activity must meet one of the following requirements:
 - Benefit populations presumed LMI (elderly, severely disabled, homeless, abused children, victims of domestic violence, migrant farm workers)
 - Meet income eligibility requirements
 - Be of such a nature and in such location that it can be concluded clients are primarily LMI (e.g., daycare center designated to serve residents of a public housing complex)
- Jobs:** Activities related to the creation and/or retention of jobs for LMI persons
 - At least 51 percent of the jobs will be held by or made available to LMI persons




[HUD Overview of National Objectives](#)

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How can we determine LMI Income based on location?



FY 2025 INCOME LIMITS DOCUMENTATION SYSTEM

[HUD.gov](#)
[HUD User Home](#)
[Data Sets](#)
[Fair Market Rents](#)
[Section 8 Income Limits](#)
[MTSP Income Limits](#)
[HUD LIHTC Database](#)

FY 2025 Income Limits Summary

FY 2025 Income Limit Area	Median Family Income Click for More Detail	FY 2025 Income Limit Category Click for More Detail	Persons in Family							
			1	2	3	4	5	6	7	8
Asheville, NC MSA	\$93,100	Very Low (50%) Income Limits (\$) Click for More Detail	32,600	37,250	41,900	46,550	50,300	54,000	57,750	61,450
		Extremely Low Income Limits (\$)* Click for More Detail	19,600	22,400	26,650	32,150	37,650	43,150	48,650	54,150
		Low (80%) Income Limits (\$) Click for More Detail	52,150	59,600	67,050	74,500	80,500	86,450	92,400	98,350

NOTE: Buncombe County is part of the Asheville, NC MSA, so all information presented here applies to all of the Asheville, NC MSA.

The Asheville, NC MSA contains the following areas: Buncombe County, NC; Henderson County, NC; and Madison County, NC.

Google Search: Office of Policy Development and Research – Income Limits

Income thresholds are based on Section 8 Income Limits

<https://www.huduser.gov/portal/datasets/il.html>

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Eligibility: Is the project an eligible housing, infrastructure, or economic revitalization project?

Project Eligibility Flow Chart

Location: Is the project located in a HUD-approved MID area? If no, is it in a state-identified MID area?
(80% of funds must be spent in HUD MID areas)

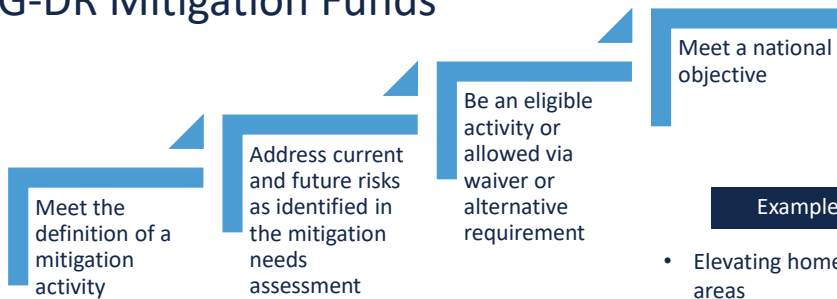
Tie-Back to Disaster: How does the program or activity address a direct or indirect impact of Hurricane Helene?

National Objective: Does the project meet the LMI objective? (household, area, clientele, jobs)

National Objective –If the project does NOT serve LMI, does it address an urgent need? If not, slums/blight objective?

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CDBG-DR Mitigation Funds



MITIGATION ACTIVITIES ARE THOSE THAT INCREASE RESILIENCE TO FUTURE DISASTERS AND REDUCE OR ELIMINATE THE LONG-TERM RISK OF LOSS OF LIFE, INJURY, DAMAGE TO AND LOSS OF PROPERTY, AND SUFFERING AND HARDSHIP.

Examples of Mitigation Activities

- Elevating homes or buildings in flood-prone areas
- Rebuilding or repairing homes using resilient materials that withstand high winds, flooding, or fire
- Relocating public infrastructure (e.g., wastewater treatment plants, pump stations) out of floodplain
- Improving bridges and roads to withstand higher flood levels
- Supporting broadband and communication systems to improve disaster response capacity

*No requirement that mitigation funds be tied back to the disaster

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Housing Programs

- In general, CDBG-DR eligible housing activities include:
 - New construction
 - Reconstruction/rehabilitation
 - Homeownership assistance
 - Buyouts
 - Rental assistance

Must incorporate mitigation measures when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential buildings

Must meet at least one Green Resilient Building Standard and one minimum energy efficiency standard for all new construction, reconstruction and rehabilitation activities for substantially damaged residential buildings.

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#1. Housing: Residential Reconstruction and Rehabilitation

Grants for reconstruction or rehabilitation of owner-occupied units seriously damaged or destroyed by Helene.

Total Funding: \$807 Million (\$677M CDBG-DR +\$130M Mitigation

★ Local governments NOT eligible to apply

Eligible Applicants	Individual homeowners that owned property at the time of Helene Four phase application process <ul style="list-style-type: none">Phase 1 – MID areas & ≤ 60% AMIPhase 2 – MID areas 60-80% AMIPhase 3 – Reimbursement below 80% AMIPhase 4 – 80-120%
Assistance	Grant of up to \$375,000
Program Guidelines	Homeowners required to maintain ownership/residency for 3 years
Prohibited Uses	Forced mortgage payoffs; compensation payments; temporary housing assistant benefits, including mortgage and rental assistance; reconstruction of housing in a floodway.

Prioritization:

Application priority is assigned based on income (below 60%, 60-80%, and under 120% of area median income) and at least one of the following:

- ✔ Households with seniors age 62 and older.
- ✔ Households with children under the age of 18.
- ✔ Households with individuals with disabilities.

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#1. Housing: Residential Reconstruction and Rehabilitation



- Intake Center Locations: Buncombe, Marion, and Boone
- State contacts:
 - Maggie Battaglin
 - Maggie.battaglin@commerce.nc.gov
 - Samantha Graham
 - Samantha.graham@commerce.nc.gov



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#2. Housing: Workforce Housing for Ownership

Focused on increasing the number of affordable housing for PURCHASE by LMI households



Construction of Workforce Housing for Ownership

★ Program will be open to local governments

Program Overview: Designed to fund the construction of affordable homeownership units aimed at “workforce” households earning ≤ 80% of AMI within HUD-identified MID counties in western North Carolina.

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#2. Housing: Workforce Housing for Ownership

Grants to fund development of “workforce housing” for purchase by LMI households at or below 80% AMI

Total Funding: \$53.38M (\$44.07M CDBG-DR + \$9.31M Mitigation)

★ Program will be open to local governments

NCDOC will later issue guidelines and a competitive NOFA with application instructions, scoring criteria, and timeline details.

Workforce Housing Program	
Eligible Applicants	Local governments, public, private, or non-profit organizations, and Community Development Housing Organizations., and Community Based Development Organizations
Award Amounts	\$2 - \$5 million
Application Period	One application round in 2026
Beneficiary Requirements	Households at or below 80% AMI. Located in a combined MID areas
Reducing Barriers for Assistance	Developers must price units to be affordable to LMI households

Eligible Activities

- 100% of funds will be expended for units to be purchased by qualifying LMI individuals in combined MID areas.

Misty Herget –Workforce Housing Program Director
Misty.herget@commerce.nc.gov

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Eligible Activity: Will the project fund the construction or reconstruction of homes for purchase by qualifying LMI households?

Location: Is the project located in a HUD-identified MID area? If not, is it located in a state-identified MID area?

Tie-Back to Disaster: How does the project address an indirect impact of the disaster? (Will not be a direct impact)

National Objective –Does the program meet the LMI objective? (Must meet LMI household objective)

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#3. Multifamily Construction & Repair Program

Total Funding: \$191 Million (\$172M CDBG-DR + \$19M Mitigation)

Focused on increasing amount of affordable RENTAL housing for LMI households.



★ Program will be open to local governments

Program Overview: Program focused on the construction, rehabilitation, or reconstruction of **rental** housing.

Structured into two tiers:

- Small projects (≤ 7 units)
- Large projects (≥ 8 units)

NC Department of Commerce will issue a Notice of Funding Availability (NOFA) with details on eligible applicants, scoring, and submission deadlines.

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#3. Multifamily Construction & Repair Program - Small Projects


Program focused on construction or rehabilitation buildings containing up to 7 rental units.

Small Project Requirements	
Eligible Applicants	Property owners
Eligible Areas	HUD-identified MID areas
Award Amounts	\$250,000 - \$1.5 million
Application Process	Ongoing: Applications are reviewed and funded on a rolling basis, pending available funds
Beneficiary Requirements	Targets tenants with income levels ≤80% AMI
Eligible Projects	Small-scale developments—either new construction or rehabilitation—of buildings containing up to 7 rental units

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#3. Multifamily Construction & Repair Program – Large Projects

Program prioritizes deeply affordable units, accessibility, resilience, and geographic distribution within the most-impacted areas.

 Will be open to local governments

Large Projects: 8+ Units	
Eligible Applicants	Local governments, private developers, public or non-profit organizations, and CHDOs/CBDOs
Award Amounts	\$500,000 - \$15 million
Application Period	Multiple rounds over next several years
Beneficiary Requirements	At or below 80% of AMI
Location	Combined MID areas; additional consideration for Difficult Development Areas (DDAs) and Qualified Census Tracts (QCTs)

Eligible Activities

- New construction
- Reconstruction/rehabilitation

Key Considerations

- Building with 5+ rental units must in install broadband
- Funds often used in conjunction with other funding, such at HOME
- Affordable rent limits as established by HOME Program
- Affordability period: 20-year for new construction

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Eligible Activity: Is the project to fund construction or reconstruction of rental housing for LMI households?

Location: Is the project located in a HUD-identified MID area? If not, is it located in a state-approved MID area?

Tie-Back to Disaster: How does the activity address an indirect impact of the disaster?

National Objective – LMI Household: Does the program or activity serve LMI households?

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#4. Community Infrastructure Program

Action Plan identified various unmet infrastructure needs:
Electrical, Gas, Water, Sewer, Waste, Telecom, Roads and Bridges

Program Overview: competitive grant initiative designed to rebuild, enhance, and prevent future damage to public infrastructure.

★ Program will be open to local governments

- \$1B - electrical wiring and electrical infrastructure systems
- \$100M - local parks and trail networks
- \$41M - gas lines
- \$205M - dams and mining sites
- \$3.7B - water systems and impacted pipe infrastructure
- \$128M - facilities containing hazardous waste
- \$100M - telecommunications and internet infrastructure
- *Substantial damage - roads and bridges

Action
Plan
Unmet
Needs



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#4. Community Infrastructure Program

Grants for infrastructure projects that will help impacted communities become more resilient

Total: \$193,500,000 (\$174,872,300 CDBG-DR; \$18,627,700 Mitigation)

★ Program will be open to Local Governments

		Funding Priorities
Eligible Applicants	Local governments in combined MID counties	<ul style="list-style-type: none">• Projects with a substantial amount of other funding available• “Shovel ready” projects• Projects that provide a greater benefit to housing recovery• Projects that serve areas with higher LMI populations
Application Period	Two application rounds: First round priority for to projects in HUD-identified MID areas. Second round available to combined MID areas	
Funding Amounts	\$500,000 - \$15 Million	
Mitigation Measures	Applicants must identify specific mitigation actions as part of the basic application and include costs in the funding request	
Prohibited Projects	Local government emergency operations centers	

Ayanna H. Wallace – Program Director

Ayanna.Wallace@commerce.nc.gov

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Infrastructure Projects

Eligible Projects

- Surface transportation, including roadways, bridges, railroads
- Water resources projects
- Energy production and generation
- Electricity transmission
- Broadband
- Pipeline repair
- Stormwater and sewer
- Drinking water infrastructure
- Schools
- Hospitals
- Housing shelters

NC DOC will issue a Notice of Funding Availability (NOFA) with more details on the types of eligible projects.

Railway Project

- Repair and stabilization of damaged rail beds and track infrastructure

Stormwater Projects

- Replace drainage culverts
- Pump station replacement
 - Demolition/construction/backup generators, elevation
- Repair stormwater outfalls

Broadband/Telecommunications

- Installation of fiber-optic cables
- Construction of wireless towers

Streambank Stabilization

Landfill repairs

Wastewater Treatment

- Sewer line installation or replacement
- Manhole replacement/repair
- Lift station repairs and upgrades
- Treatment plant construction or expansion

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Eligible Activity: Is the infrastructure project an eligible CDBG-DR project?

Location: Is the project located in a HUD-identified MID area? If no, is it in a state-identified MID area (second round)

Tie-Back to Disaster: How does the activity address a direct or indirect impact of the disaster?

National Objective – LMI Does the project meet an LMI objective? (Area Basis/Household/Jobs)

National Objective – If LMI objective not met, does the project meet an urgent need or eliminate slums/blight?

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Infrastructure Projects & Meeting the LMI Objective

- **Area Benefit:** Projects that benefit a geographic area where at least 51% of residents are LMI
- **Universal Notice – Alternative Requirement**
 - If the 51% area benefit cannot be met, alternative calculation authorized
 - Multiply total cost of infrastructure project by % of LMI persons in the service area

Example:

- Infrastructure activity total cost: \$1,000,000
- LMI persons in the activity's service area is 40 percent

$\$1,000,000 \times 40\% = \$400,000$ would count towards benefiting LMI persons when calculating a grantee's overall benefit.

Note: Do not pursue this alternative requirement if doing so comes at the expense of pursuing an infrastructure project that can meet the standard LMI national objective criteria.

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Commercial District Revitalization Program

Funding to help revitalize commercial areas in MID Areas

★ Program will be open to local governments

Program objectives:

- Acquisition, demolition, site preparation, or rehabilitation of commercial structures
- Mixed-use projects involving commercial revitalization and housing components
- Facade improvements to private or public structures in commercial areas



NCDOR will define “commercial district” and identify eligible projects

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#5. Commercial District Revitalization

Grants to carry out revitalization activities in commercial areas impacted by Helene

\$111 Million (\$102 Million CDBG-DR + \$9 Million mitigation)

★ Program open to local governments

Eligible Applicants	Local governments & nonprofits
Application Period	Planning to launch program in the fall. Details on application cycles forthcoming.
Funding Amounts	\$500,000 - \$10 Million

*NCDOR still working to design program requirements.

Emily Quinlan – Program Director
emily.quinlan@commerce.nc.gov

Eligible Activities

- Acquisition, demolition, site preparation, or rehabilitation of commercial structures
- Mixed-use projects involving commercial revitalization and housing components
- Facade improvements to private or public structures in commercial areas

Project Examples

- Downtown Wifi
- Park upgrades
- Sidewalk installation
- Greenways
- Façade improvements
- Mixed-use development
- Streetscapes

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Project Examples

COMBINING HOUSING, INFRASTRUCTURE, AND COMMERCIAL DISTRICT REVITALIZATION PROJECTS TO SUPPORT RECOVERY

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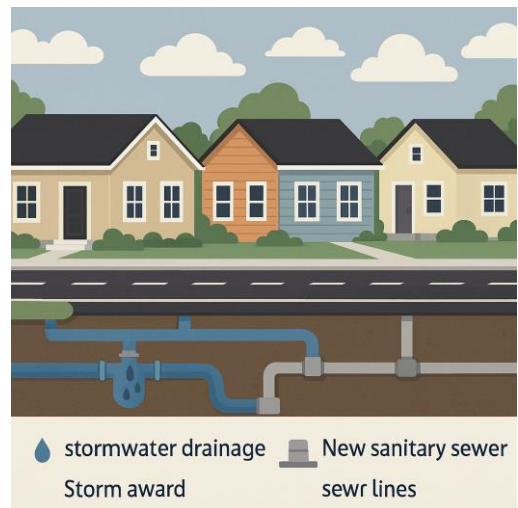
Example: Workforce Housing + Infrastructure

Housing Component:

- Construction of 20 workforce housing units in a LMI neighborhood that was severely damaged during the storm.
- Mitigation: Units constructed to meet current building code standards and include elevation and floodproofing measures to reduce future risks.

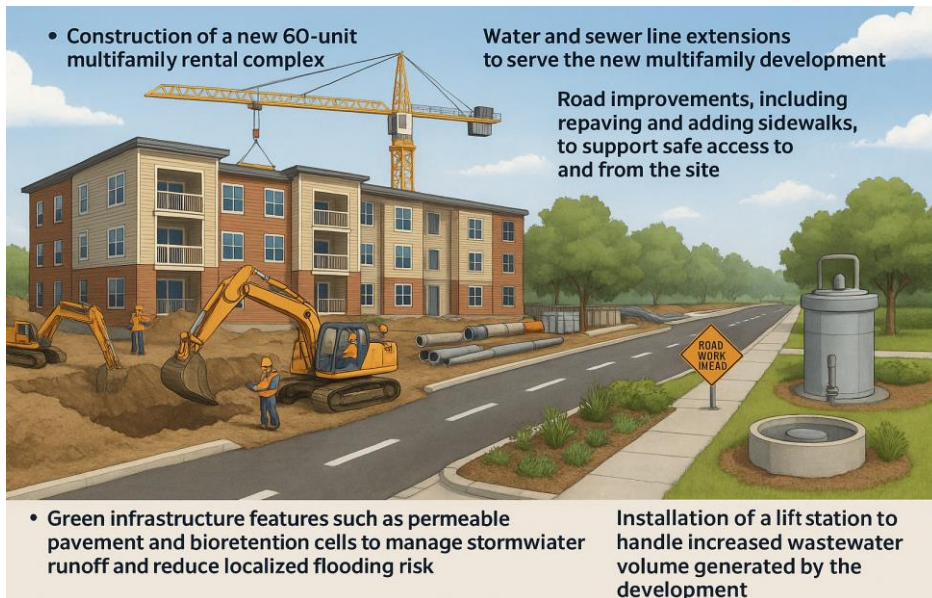
Infrastructure Component:

- Upgraded stormwater drainage systems (e.g., new culverts, bioswales, or larger storm drains) throughout the same neighborhood to mitigate flooding.
- Elevation of roads and installation of new sanitary sewer lines to reduce backflow into homes during storms.



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Example: Multifamily Rental Housing + Infrastructure



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Multifamily Rental Housing: Senior Living Redevelopment

Housing component: This project transforms a long-abandoned hospital building into a 40-unit affordable senior housing facility serving low- to moderate-income (LMI) residents.

Hazard mitigation measures such as elevating mechanical systems above base flood elevation, installing flood vents, and implementing a backup power generator.

Infrastructure component: The project also includes key infrastructure upgrades to support the revitalized site:

- Replacement of aging water and sewer lines
- Installation of ADA-compliant sidewalks to enhance accessibility
- Stormwater drainage improvements to reduce localized flooding risk



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Example: Infrastructure Project Public Facility Community Center & Emergency Shelter

Infrastructure of Public Facilities 24 CFR
570.201(c)

- Community center
- Senior center
- Resource center
- Homeless shelter
- Health center
- Public facilities may also serve as an emergency shelter, which can further support a tie-back to the disaster



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Example: Infrastructure Project Public Park and Greenway Reconstruction & Restoration

Infrastructure component

- Restore damaged parks and greenways
- National objective – LMI Area benefit if at least 51% of residents in the service area are LMI



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Multifamily Rental Housing + Infrastructure + Commercial District Revitalization

Mixed-Use Affordable Rental Housing

- 40 LMI rental units
- Ground-floor commercial space

Infrastructure Improvements (Around the Block)

- New water & sewer lines
- Stormwater drainage upgrades

Economic Revitalization

- Facade improvement
- ADA-compliant sidewalks
- New public plaza on a formerly blighted lot
 - Green Space
 - Outdoor Seating
 - Space for Community Events



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Poll 2

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Key Considerations

UNDERSTANDING NEXT STEPS IN THE FUNDING PROCESS

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Environmental Reviews

- Environmental review process must be completed and approved BEFORE funds are committed or spent!
- NCDOC will determine the environmental review process for each project type
- Do NOT start a project before the environmental review process is complete.
 - Do not move dirt!
 - Do not acquire property!
 - Do not hire engineers to design a project (yet)!



Why this matters?

Avoid “Choice-Limiting” Actions:

- Committing HUD or non-HUD funds (e.g., purchasing property/executing contracts)
- Physically altering a property (e.g., site grading or demolition)

- May we rely on FEMA’s Environmental Review for CDBG-DR Projects?
Maybe. The FEMA-reviewed project must be substantially the same as the HUD-funded project and FEMA’s environmental review must meet or exceed the standards required under HUD’s Part 58 review process. Adoption is not automatic—it must be formally documented and determined to be sufficient by the Responsible Entity and HUD.

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Duplication of Benefits

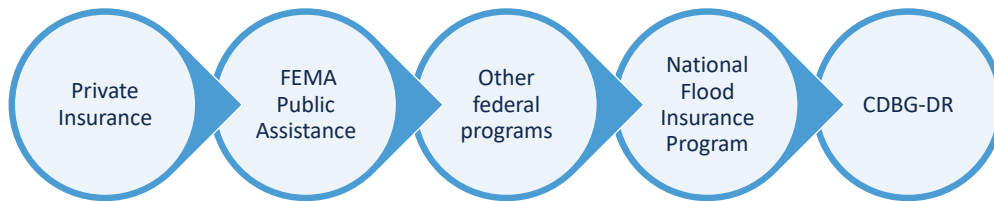
A DOB occurs when a person, household, or other entity receives financial assistance from multiple sources that can be used for the same purpose, AND the total assistance received exceeds the total need for assistance.

NCDOR will perform the DOB analysis for local governments; however, counties and municipalities must provide relevant financial documentation

The basic **DOB calculation framework** consists of five main steps:

- Assess an applicant's total need,
- Identify total assistance available to the applicant,
- Exclude non-duplicative amounts of financial assistance
- Identify the DOB amount, and
- Calculate the total award.

[HUD DOB Analysis Worksheet](#)



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Procurement Compliance Tips

- Contractors or firms that develop or draft contract specifications, statements of work, invitations for bids, and/or requests for proposals must be excluded from competing for the underlying procurement. 2 C.F.R. 200.319(b).
- Contracts costing above \$250,000 require an independent cost or price estimate before receiving bids or proposals. 2 C.F.R. 200.324.
- Service contracts must be competitively bid (not a state-law requirement).

Federal procurement requirements will apply to expenditures of CDBG-DR funds

▼ Procurement Standards	200.317 – 200.327
§ 200.317	Procurements by states.
§ 200.318	General procurement standards.
§ 200.319	Competition.
§ 200.320	Methods of procurement to be followed.
§ 200.321	Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.
§ 200.322	Domestic preferences for procurements.
§ 200.323	Procurement of recovered materials.
§ 200.324	Contract cost and price.
§ 200.325	Federal awarding agency or pass-through entity review.
§ 200.326	Bonding requirements.
§ 200.327	Contract provisions.

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What may we do now to prepare?

Project Planning

- Conduct needs assessment to identify and prioritize unmet recovery needs
- Identify project location(s)
 - Check that project is not in a floodplain
- Align proposed project with a direct/indirect "tie-back"
- Confirm the project meets a CDBG national objective
- Coordinate efforts and communicate with stakeholders

Administrative Planning

- Evaluate capacity to prepare grant application
- Consider technical assistance needs
- Draft or revise policies to reflect CDBG-DR rules (procurement/conflict of interest, etc.)
- Establish clear roles and responsibility for grant management and oversight
- Update financial management systems
- Establish internal controls

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Poll 3

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