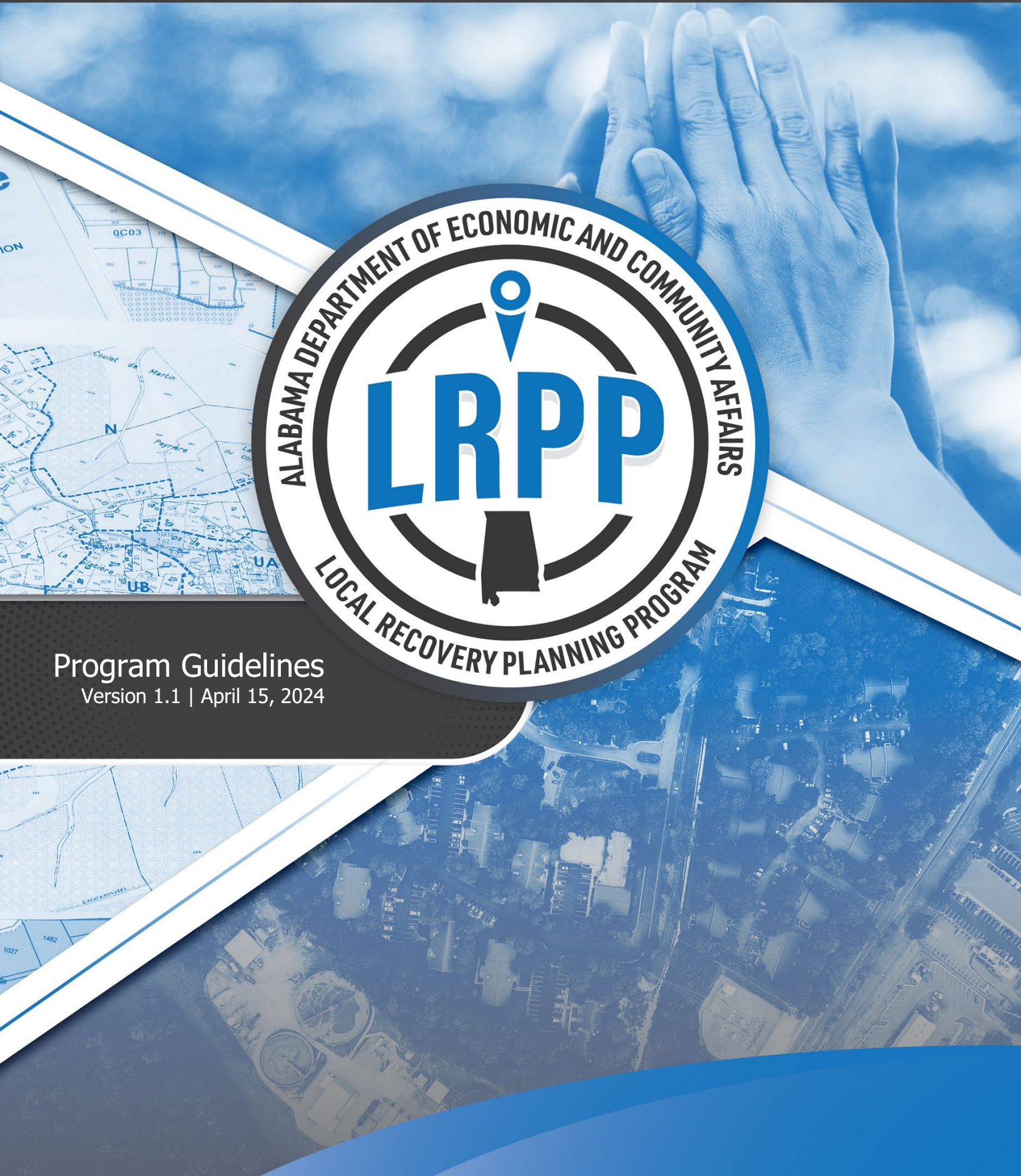


LOCAL RECOVERY **PLANNING PROGRAM**



Program Guidelines
Version 1.1 | April 15, 2024



Version Control

Version Number	Date	Summary of Changes	Approved By
1.0	03/16/2023	Original version	K. Boswell, Director
1.1	4/15/2024	Removed references to Appendix B on pages 16 and 21	Kenneth W. Boswell, Director

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Version Policy

Version history is tracked in the Version History Table (page i), with notes regarding version changes. Dates of each publication are also tracked in this table.

Substantive changes in this document that reflect a policy change will result in the issuance of a new version of the document. For example, a substantive policy change after the issuance of Version 1.0 would result in the issuance of Version 2.0, an increase in the primary version number. Non-substantive changes such as minor wording and editing or clarification of existing policy that do not affect interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase behind the primary version number (i.e., Version 2.1, Version 2.2, etc.).

Policy Change Control

Policy clarifications, additions, or deletions may be needed during the course of the program to more precisely define the rules by which the Program will operate. Policy decisions will be documented and will result in the revision of the document in question. Unless otherwise noted, policy revisions are applied prospectively, made effective on the date of document approval.

Acronyms

ACCA	Association of County Commissions of Alabama
ADECA	Alabama Department of Economic and Community Affairs, State entity designated to administer federal funding in response to the Covered Disasters.
AFFH	Affirmatively Furthering Fair Housing
AFH	Assessment of Fair Housing
AMI	Area Median Income
CDBG-DR	Community Development Block Grant Disaster Recovery program.
CFR	Code of Federal Regulations
DOB	Duplication of Benefit
FEMA	Federal Emergency Management Agency
FEMA IA	Federal Emergency Management Agency Individual Assistance program
FEMA PA	Federal Emergency Management Agency Public Assistance program
FR	Federal Register
HHMID	Hardest Hit Most Impacted and Distressed City/County identified by the federal government.
HRAP	Home Recovery Alabama Program (State of Alabama’s single-family homeowner rehabilitation and reconstruction program)
HUD OIG	U.S. Department of Housing and Urban Development Office of Inspector General
HUD	U. S. Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit program
LMI	Low- and Moderate-Income
LRP	Local Recovery Plan
LRPP	Local Recovery Planning Program (State of Alabama’s process to develop local strategies that identify projects and capacity enhancements that address risks to community lifelines that support health and safety while mitigating against future disasters).
MID	Most Impacted and Distressed County identified by the federal or state government.
MID Recovery Zone	Most Impacted and Distressed Area identified by local unmet needs assessment within a HHMID or MID county where project or program activities will be concentrated.
R/ECAPS	Racially or Ethnically Concentrated Areas of Poverty
SBA	U.S. Small Business Administration
SoVI	Social Vulnerability Index



1 Introduction

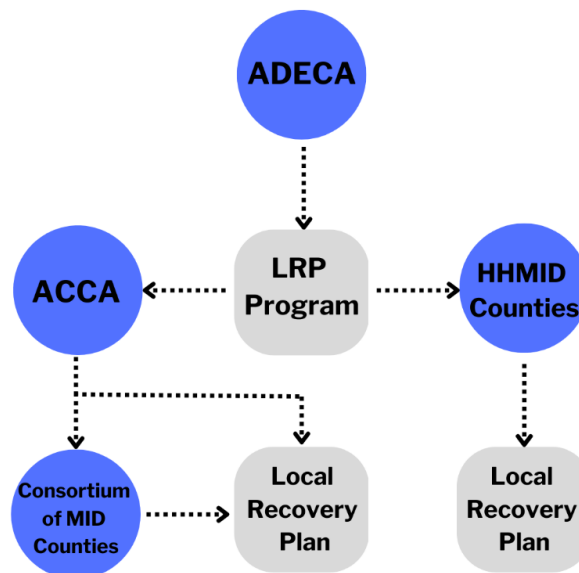
The Local Recovery Planning Program (LRPP) was established to provide Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to support local governments in identifying unmet needs within their communities in collaboration with partners and the public to establish a Local Recovery Plan (LRP). LRPP will enable participating jurisdictions to pursue resources and necessary capacity investments to mitigate against future disasters and support ongoing recovery efforts.

1.1 HHMID and MID Designations

These Program Guidelines apply uniformly to both pathways unless a particular provision or requirement is clearly identified as “HHMID” or “MID”.

Pathway	HHMID	MID Planning Consortium
Description	HHMID counties will each develop an LRP specific to their jurisdiction.	The seven (7) MID counties will collaborate via a planning consortium to develop one LRP encompassing all seven MID counties.
Jurisdictions	Federally designated MID Counties (and Municipality) that were designated “Hardest Hit” by ADECA: Baldwin, Mobile, City of Mobile.	Federally designated MID Counties: Clarke, Escambia. State-Designated MID Counties: Dallas, Marengo, Perry, Washington, Wilcox.
Activities	HHMIDs can fund programs and/or projects with their direct CDBG-DR allocation from ADECA	MID Counties will competitively apply to receive CDBG-DR funding from ADECA for specific recovery and mitigation projects.

All State and Federally designated HHMID and MID counties identified above are eligible to participate in the program for the creation of an LRP, including support for technical assistance and capacity building.





The designation as an HHMID or MID is in response to Hurricanes Sally and Zeta that struck the Gulf Coast in September and October of 2020, wherein Congress appropriated funds to support long-term recovery efforts following Hurricane Sally (FEMA DR-4563) and Hurricane Zeta (FEMA DR-4573) through the Extending Government Funding and Delivering Emergency Assistance Act (Pub. L. 117-43) On February 3, 2022, the U.S. Department of Housing and Urban Development (HUD) published Federal Register Vol. 87, No. 23 (87 FR 6364) allocating \$311,732,000 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to the State of Alabama. On May 24, 2022, HUD published Federal Register Vol. 87, No. 100 (87 FR 31636) allocating a supplemental amount to Alabama of \$189,520,000 for a total allocation of \$501,252,000. These funds will be administered through the Alabama Department of Economic and Community Affairs (ADECA). CDBG-DR funding is designed to address remaining unmet disaster recovery needs after all other forms of assistance have been exhausted. The storms resulted in 35 counties presidentially declared for FEMA Public Assistance, of which, 9 counties were also declared for FEMA Individual Assistance. In compliance with the requirements outlined in the Federal Register, ADECA has developed the 2022 Public Action Plan for Disaster Recovery (the “Action Plan”) to describe how the allocated funding will be administered to address long-term recovery needs in the HUD- and State-identified HHMID and MID areas in a way that is compliant with all federal, state, and local regulations.

1.2 Program Description

The LRPP will provide participating HHMIDs and MIDs a path to recovery and greater resilience. Resilience is defined as a community’s ability to minimize damage and recover quickly from disaster events and changing conditions, including natural hazard risks. To integrate hazard mitigation and resilience planning with recovery efforts, ADECA will promote sound, sustainable, long-term recovery planning informed by post-disaster evaluation of hazard risk and the creation of resilience performance metrics. All rehabilitation, reconstruction, and new construction work will be designed to incorporate the principles of sustainability, including water and energy efficiency, resilience, and mitigation against the impact of future disasters. ADECA will—and will encourage its subrecipients to—incorporate preparedness and mitigation measures for rebuilding activities. This helps to ensure that communities build back safer and stronger than before the disaster.

In accordance with the Action Plan and aligned with the findings of the Unmet Needs Assessment (UNA), ADECA is investing in long-term, local recovery planning across the storm impacted counties. To distribute these funds, the LRPP will aid in the development of Local Recovery Plans (LRP) incorporating the following:

- Housing, Infrastructure, and Economic Recovery Planning
- Housing, Infrastructure, and Economic Mitigation Planning
- Equitable Engagement and Robust Citizen Participation Planning
- Subrecipient Capacity Assessments

LRPs will support communities in identifying recovery and mitigation activities, leveraging CDBG-DR and other funding resources and strategies for recovery, resilience, and mitigation. The goal of the program is to promote comprehensive community recovery and mitigation.

1.3 Program Objective

Within the Action Plan, ADECA identified its intent to use planning funds to require HHMIDs and MIDs to further analyze, on a local level, remaining unmet needs, identify any gaps in service, and to identify vulnerable populations and recovery and/or mitigation activities that will best serve their needs. In developing the recovery and mitigation programs in the Action Plan, ADECA accounted for HUD’s requirement to advance equity for protected class groups.

- **HHMID:** Jurisdictions, as subrecipients of ADECA, are to use the demographic data provided in both the state and local unmet needs assessments to ensure equitable selection criteria



and funding allocations based on the accepted LRP as part of their program and project selection.

- **MID:** Jurisdictions will use the demographic data provided in both the state and local unmet needs assessments to develop recovery strategies that identify appropriate activities that will best serve the needs of the vulnerable populations, and ultimately lead to projects for submission to the competitions.

Furthermore, the local unmet needs assessment will enhance ADECA's review of each HHMID and MID's disaster impact by acknowledging the areas with concentrated levels of federally protected classes that have experienced historical disinvestment.

The intent of the LRPP is to better understand the vulnerability of disaster-impacted populations, thereby assisting subrecipients in identifying activities that will have the greatest impacts to meet the unmet recovery and/or mitigation needs of those most vulnerable populations.

1.4 Program Goals

The goal of the LRPP is to promote comprehensive recovery and mitigation by developing strategies through robust community outreach and participation that identify eligible activities¹ that support the long-term recovery from hurricanes Sally and Zeta, and/or that address risks to community lifelines that support health and safety while mitigating against future disasters. To achieve this goal, activities must tie back to the disaster and/or be able to clearly quantify a reduction in risk or loss of life and property. The LRP will account for conditions that existed prior to the disaster and articulate how the impacts from the disaster exacerbated such conditions or, through mitigation projects, would alleviate the impacts of future disasters. To effectively measure the reduction of risk and to ensure that limited funding goes to the places and people that need them the most, the LRPs must identify the geographical locations that contain the most impacted, distressed, and vulnerable populations within each of the federal and state designated HHMIDs and MIDs. Once delineated in the plan, these areas shall constitute the Most Impacted and Distressed Recovery Zone(s) (MID Recovery Zones) within the participating HHMID or MID.

The focusing of funding within the MID Recovery Zones will result in the identification of:

1. Eligible activities for recovery and/or mitigation to reduce future risk or loss of life; and
2. Potential applicants/recipients of CDBG-DR funds to implement specific projects and/or capacity building.

As outlined in the Action Plan, LRPs will be developed to identify a list of activities intended to address the greatest needs outlined in the State and local unmet needs assessments.

HHMIDs, as direct recipients of CDBG-DR funds, are encouraged to identify projects and programs within the LRP that address recovery and mitigation needs. Programs can include, but are not limited to, public services in support of targeted populations, homebuyer assistance, or voluntary buyouts. Additional eligible programs will be defined in conjunction with and approved by ADECA in accordance with the particular jurisdiction's subrecipient agreement.

MIDs, consisting of eligible local governments, are encouraged to identify project concepts within the LRP that may ultimately be submitted to the Local Recovery Housing and Local Recovery and Resilience Competitions.

While LRPs should identify and analyze disaster impacts to single-family housing rehabilitation and reconstruction activities, ADECA will be administering the state-administered Home Recovery Alabama

¹ The term activity is defined as a recovery or mitigation project or program carried out by subrecipients. Note that while HHMIDs can carry out both projects and programs, MIDs are limited to projects only.



Program (HRAP) directly. HHMIDs and MIDs are encouraged to work with ADECA on outreach activities within their jurisdictions for activities associated with rehabilitation or reconstruction of owner-occupied and renter-occupied single-family buildings (1-4 units). For all other identified activities, HHMIDs and MIDs are encouraged to review the program guidelines for ADECA's other CDBG-DR programs for eligibility of potential projects as they become available.

All plans must demonstrate extensive local outreach; ensure collaboration with local governments, non-profits, and other stakeholders; and adequately demonstrate the subrecipient's capacity to administer programs or activities described in the plans. The successful development and acceptance of an LRP is required prior to the implementation of subrecipient recovery activities.

1.5 Method

In order to pursue resources and necessary capacity investments local governments will be asked to identify MID Zones as defined in Section 5.4, that will concentrate recovery and mitigation activities within the context of a broader strategy in response to unmet needs and vulnerable populations. Activities identified shall then be further explored, scoped, and defined into a specific project/program prior to seeking funding. The identification of MID Recovery Zone areas, unmet needs, and the crafting of projects/programs that address unmet needs requires outreach, engagement, and stakeholder consultation as defined in Section 10.3. While the identification of a particular project/program is the necessary outcome to receive an award or authorization to use grant funds, for the LRPP the LRP need to, at minimum, identify project/program types. Project/program types identify the activities to be pursued to address a particular unmet need, but types do not necessarily articulate location, size and other critical details as noted in Section 10.4.8.

1.6 Unmet Needs in CDBG-DR Action Plan

To effectively administer the \$501,252,000 in CDBG-DR funds allocated for disaster recovery to the state, ADECA was designated as the administrator of disaster recovery funding for the covered storms and has prioritized programs that will assist in meeting the short- and long-term needs of impacted residents and communities, in accordance with the unmet needs assessment and input from community stakeholders identified in the Action Plan. The State's unmet needs assessment indicates there are unmet needs in three primary recovery sectors: (1) Housing; (2) Infrastructure, and (3) Economic Revitalization. ADECA's program design aims to address these unmet needs and increase resilience against future disasters in impacted communities. The LRPP refines the process undertaken at the state level by reproducing and expanding it locally to ensure ample participation in the development of activities and identification of capacity enhancements intended to address short- and long-term needs of the most impacted and at-risk residents and communities.

2 Planning Approach

The LRPP is intended to build upon and supplement the State's Action Plan Unmet Needs Assessment. An LRP must be created for counties that were identified by either the Federal or State government to be the Hardest Hit Most Impacted and Distressed (HHMID)² or the Most Impacted and Distressed (MID). There are two pathways depicted below.

² HHMIDs were designated by ADECA due to the significant portion of unmet needs located in those counties, as documented in the action plan. HHMIDs consist of HUD-designated Most Impacted and Distressed areas including Mobile and Baldwin Counties, as well as the inclusion of the City of Mobile. As a result, these local governments are receiving a direct allocation of CDBG-DR funds from the State, as documented in the method of distribution section of the action plan.



The LRPP will provide planning funds in support of HHMIDs and MIDs to bring local knowledge and resources into the planning process.

- The **HHMIDs** will directly develop LRPs using their own internal and/or external resources.
- The **MIDs** will coordinate to establish a MID County Recovery Planning Consortium in support of the State’s Subrecipient, the Association of County Commissions of Alabama (ACCA). Together, the MID County Recovery Planning Consortium and ACCA will work to develop an inclusive and comprehensive LRP on behalf of planning consortium members. The MID County Recovery Planning Consortium will develop one LRP, however, where applicable, each participating county will have its own county-specific sections within the LRP.

To maximize the impact of recovery to the populations and areas with greatest needs, the HHMIDs and MIDs, through a data-driven and equitable engagement planning process, will establish MID Recovery Zones to target recovery investments that will benefit the most storm impacted, vulnerable populations and places throughout each county. This will be achieved through the analysis of the best available data coupled with intentional stakeholder consultation.

3 HHMID and MID Key Milestones and Timeline

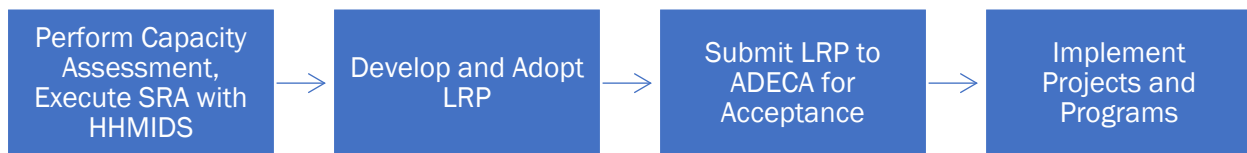
3.1 Notice of Program Availability

The Program will launch when a notice of program availability is posted on ADECA’s website. Eligible HHMID and MID counties will also be notified prior to and upon Program launch.

ADECA’s website is www.adeca.alabama.gov.

3.2 HHMID Pathway

Each HHMID will develop their own LRP and will receive direct CDBG-DR funding from the State of Alabama, provided via a formula allocation. The governing body of each HHMID jurisdiction participating in CDBG-DR funded programs must adopt the LRP prior to receiving an authorization to use these grant funds.

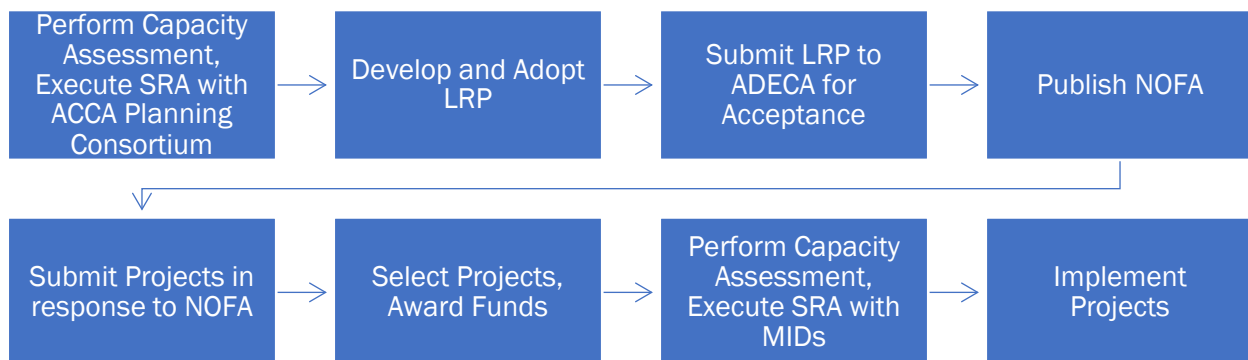


3.3 MID Pathway

To support the MID counties effectively and efficiently, ADECA will partner with the Association of County Commissions of Alabama (ACCA), as a subrecipient, to organize and assist with the administration of the LRPP. MID counties will be required to form a planning consortium to collaborate and develop one master LRP to serve the participating MID counties, the utilization of ACCA of which all counties are members will streamline this process and add necessary capacity. An HHMID County seeking further capacity to develop the LRP may also partner with an organization such as ACCA but would not be part of the planning consortium. The LRP incorporating each MID County must be completed in collaboration with that county’s, local governments and other stakeholders within its boundaries and will serve as an extension of the State’s unmet needs assessment. The governing



boards of the jurisdictions within the MID areas do not need to adopt the LRP but shall have the plan presented to them prior to submission to the State.



3.4 MID Recovery Zones

HHMIDs and MIDs are required to identify MID Recovery Zones in each of the counties participating in LRPP. Recovery zones are defined as the areas of HHMID and MID counties that meet the following two conditions:

- 1) where populations with vulnerable populations reside; and
- 2) where local unmet needs exist.

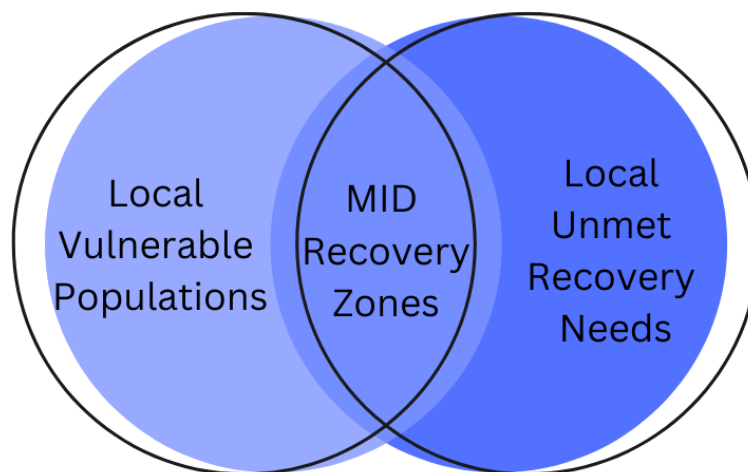


Figure 1: MID Recovery Zone Requirements

Identifying local vulnerable populations:

HHMIDs and MIDs must identify vulnerable populations within their jurisdictions as part of the establishment of MID Recovery Zones. Vulnerable populations include those identified as part of a protected class, hard-to-reach, underserved, historically disadvantaged areas, and economically distressed areas.



Protected Classes include:

- Age, Race, Ethnicity, National Origin, Religion, Sex (including gender identity and sexual orientation), Familial Status, and Disability.

Geographically underserved and historically disadvantaged areas include but are not limited to:

- [Racially or Ethnically Concentrated Areas of Poverty \(R/ECAP\)](#)
- [Promise Zones](#);
- [Opportunity Zones](#);
- [Neighborhood Revitalization Strategy Areas](#); and
- Tribal areas.

Analyzing local unmet needs:

HHMIDs and MIDs are required to supplement the state's unmet needs assessment, found in the State's Action Plan, by assessing remaining unmet needs at the local level. Local unmet needs assessments supporting the LRPs should include gaps analysis for housing (affordable rental and homebuyer assistance); mitigation; economic revitalization; infrastructure; public facilities; and public services. Building off the statewide data utilized by ADECA and contained within the Action Plan, the local unmet needs assessment should supplement the state data with local data sources. Local data sources should directly address rental housing, homebuyer, home buyout, infrastructure, public facility, public services, economic revitalization, and mitigation needs through the facilitation of outreach to local groups and organizations that can provide qualitative and quantitative information that will further identify opportunities to address local needs.

LRPs submitted by HHMIDs must demonstrate how the programs and activities identified in the plan address the needs of their MID Recovery Zones.

Additionally, projects submitted to the competitive programs must be located in, or directly address the needs of, MID Recovery Zones. This program guideline is only intended to address the requirements under LRPP. The other recovery programs outlined in the Alabama Public Action Plan for Disaster Recovery are governed by the respective programs own program guidelines.

4 Budgets

4.1 Planning

The State has allocated \$10 million for planning activities through the LRPP. Refer to the state's Action Plan for more information on program allocations.

4.2 Award Caps

Per the State's Action Plan, ADECA will award up to \$1 million in funding to support each of the identified HHMID Counties or Municipalities and to the established MID County Recovery Planning Consortium³ to develop an accepted Local Recovery Plan.

³ Note - The intent of creating the planning consortium of counties consisting of the federal and state identified MIDs is to create necessary capacity in support of the planning work as well as to reduce the amount of funding necessary to complete the LRP activities. Any remaining funds may be reallocated to other recovery projects.



5 Eligibility

5.1 Eligible Entities

This section provides the requirements an entity must meet to be eligible for LRPP participation. Entities include:

5.1.1 Eligible Counties

Baldwin, Mobile, Clarke, Dallas, Escambia, Marengo, Perry, Washington, and Wilcox

5.1.2 Eligible Municipalities:

City of Mobile

5.1.3 Other Eligible Entities:

Nonprofit Organizations incorporated under 501(C)(4), as designated by ADECA.

5.2 Eligible Activities

The LRPP will allow for eligible activities under the Housing and Community Development Act (HCDA), Section 105(a)(12) – Planning Activities to support eligible entities in developing a LRP that addresses remaining unmet recovery needs, mitigation activities and capacity assessments.

All HHMID and MID jurisdictions are eligible to receive funding support in the creation of LRPs, including support for technical assistance. LRPs are a requirement for HHMIDs and MIDs prior to receiving authorization to use grant funds or to be eligible to submit applications for competitive funding, respectively.

HHMIDs will be eligible to receive funding to support LRPP efforts and capacity building. ACCA will receive funding for the implementation of the LRPP on behalf of, and in conjunction with, the participating MID counties. These counties will be eligible for limited funding to be expended on staff time and related eligible expenses incurred supporting the LRPP, subject to approval by ADECA.

All plans must demonstrate extensive local outreach; ensure collaboration with local governments, non-profits, and other stakeholders; and adequately demonstrate the subrecipient's ability to administer programs or activities described in the plans. The successful development and acceptance of an LRP is required prior to the implementation of subrecipient recovery activities.

5.2.1 Mitigation

Mitigation activities are designed to promote sound, sustainable long-term recovery programs and/or projects that account for the unique hazards, opportunities, vulnerabilities, and disaster impacts within Alabama's MID disaster impacted counties. The State was awarded \$65,381,000 in the form of a set-aside for mitigation. ADECA has utilized the same formula to set-aside Mitigation funds to HHMID and MID counties. Unlike funds originating from the State's Disaster Recovery allocation, Mitigation funds do not have to have a direct tie-back to the covered storms. Mitigation funds must reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

HHMID and MIDs should refer to the Action Plan for mitigation funding allowances.



6 Roles and Responsibilities

6.1 Alabama Department of Economic and Community Affairs (ADECA)

ADECA is responsible for overall administration, compliance and oversight of the LRPP and acceptance of LRPs submitted by eligible entities. Additionally, ADECA is responsible for providing technical assistance and administering capacity assessments for all participating subrecipients. By accepting LRPs, ADECA does not determine final eligibility of activities identified within the plans because those activities will be reviewed upon execution of subrecipient agreements (HHMIDs) or application submittal to competitive programs to ensure compliance with all regulations governing their administrative, financial, and programmatic operations as well as the meeting of performance objectives identified in the subrecipient agreement. As a last resort, upon request and subject to a Substantial Amendment to the Action Plan, ADECA can implement and administer the LRPP on behalf of an HHMID.

6.2 Association of County Commissioners of Alabama (ACCA)

The Alabama County Commissioners Association (ACCA), as a subrecipient to the Alabama Department of Economic and Community Affairs (ADECA), will be responsible for implementing and administering the LRPP on behalf of the MIDs. ACCA responsibilities will be in accordance with the executed subrecipient agreement with ADECA.

Prior to implementing local recovery programs and projects, HHMIDs and MIDs are required to develop a LRP intended to identify local unmet needs based on outreach and coordination with impacted stakeholders, with the intent of identifying geographies within each county that comprise the most vulnerable populations and projects to address those needs.

The ACCA will work with eligible counties which are limited to Clarke, Dallas, Escambia, Marengo, Perry, Washington, and Wilcox counties to create one planning consortium and develop a comprehensive plan that encompasses all local needs and planned recovery activities. Consolidation of the administration and implementation of the LRPP under ACCA creates economies of scale, ensures that planning occurs in a collaborative nature crossing jurisdictional boundaries, and focuses on the populations most in need of the limited recovery funds.

Further, upon request and at ADECA's discretion, ACCA may provide support to HHMIDs as needed in the development of their LRPs.

6.3 HHMID and MID Responsibilities

- **HHMIDs**, as recipients of the direct allocation of CDBG-DR funds, are responsible for creating LRPs in a timely manner, that meet all of the LRPP requirements and identify eligible projects or programs that are aligned with the requirements of the direct allocations.
- **MIDs** are responsible for the establishment of a MID County Planning Consortium ("Consortium") or equivalent association through the execution of an Intergovernmental Agreement amongst all MID counties consisting of: Clarke, Escambia, Dallas, Marengo, Perry, Washington, and Wilcox if they chose to participate. Once the planning consortium is established it must enter into an agreement with the ACCA as it's LRPP lead entity. Finally, the Planning Consortium is responsible for creating one (1) comprehensive LRP that addresses the combined MID geography inclusive of sections dedicated to each individual MID county. If a MID decides not to participate it will not be eligible to receive any CDBG-DR funding for planning, technical assistance, or projects.



7 Program Priorities

7.1 Local Unmet Needs Analysis

ADECA completed the State unmet needs assessment in accordance with the latest HUD guidance by analyzing the best available state and federal data sources as of July 6, 2022, as part of the Action Plan. LRPs must expand upon the unmet need assessment outlined and detailed within the Action Plan by supplementing the State’s assessment with additional unmet needs assessment conducted at the local level. LRPs should also include a general capacity review detailing the HHMID’s or MID’s preparedness to implement the projects or activities identified as priorities to address unmet needs.

Local groups and organizations such as affordable housing advocates, real estate professionals, landlord associations, legal services, schools/colleges, cultural and religious institutions, and social service groups can provide valuable insight in setting priorities and must be consulted in the development of the local unmet needs assessment, in addition to the public affected by the disaster.

The prioritization of activities within adopted LRPs shall include an explanation of how identified activities and projects support the State’s priorities:

- Benefits to Low- and Moderate-Income (LMI) Households (80% AMI or less)
- Benefits to vulnerable populations that include protected classes, socially vulnerable and historically disadvantaged populations, such as those populations residing in a HUD identified [Racially or Ethnically Concentrated Areas of Poverty \(R/ECAP\)](#) Census Tracts

Activities identified and prioritized within LRPs will seek to assist eligible renters; property owners or groups of owners; businesses; nonprofit organizations; and local or tribal governments within the HHMID or MID boundaries.

7.1.1 Mitigation Analysis

HHMIDs and MIDs are required to consider current and future risks and hazards in the development and design of potential projects. Such assessments should analyze potential impacts to indispensable services such as critical business and government functions and that are critical to human health and safety or economic security. The mitigation assessment will be used to inform and support proposed projects under the LRP.

HUD defines mitigation as *“those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.”* The LRPP seeks to increase resilience and reduce the long-term risk of damage.

HHMIDs and MIDs should refer to Federal Register Notice Vol. 97, No. 23, Section IV.A.2.a. and IV.A.2.b for mitigation needs assessment requirements:

1. Assess current and future hazards.
2. Conduct a risk-based assessment.
3. Cite data sources.
4. Use risks identified in the current FEMA-approved state or local Hazard Mitigation Plan (HMP).
5. Describe the connection between unmet needs and proposed projects.
6. Describe a clear connection between the risk assessment and proposed projects.
7. Coordinate and align these funds with other CDBG-DR, CDBG-MIT, FEMA, USACE, and U.S. Forest Service and other agencies as appropriate.



8 Local Recovery Plan Requirements

The LRPs are required to identify potential recovery activities that can be further explored, scoped, and defined prior to seeking funding. The LRP should prioritize activities that address risks to community lifelines that support health and safety while mitigating against future disasters for the most impacted, distressed, and vulnerable populations within their jurisdictions.

Additionally, all LRPs must be presented to the governing board of the federal or state identified MIDs and subsequently submitted to ADECA for review and acceptance.

- **HHMIDs** cannot receive an authorization to utilize grant funds for recovery and mitigation activities until their LRP has been accepted by ADECA.
- **MIDs** cannot be deemed eligible to compete for CDBG-DR funding via the competitive programs until the LRP has been accepted by ADECA.

8.1 Local Storm Impacts

8.1.1 Pre and Post Storm Conditions

Establishing a pre- and post-disaster conditions using the best available and local data will establish a baseline and provide key insights into the conditions on the ground for the community before the disaster, and recovery activities for housing, infrastructure, and the economy post-disaster. Establishing these baselines should also include a pre- and post-disaster demographic analysis. Applicants are encouraged to review the State's Action Plan as an example and resource.

8.2 Local Recovery Unmet and Mitigation Needs Assessment

Applicants are required to provide the following information at the local level, including but not limited to the assessment of county-wide storm impacts, a description of local recovery efforts and recovery resources, and documentation for how vulnerable populations benefit and are being prioritized. Applicants should reference the State's Action Plan as an example.

8.2.1 Gap Analysis

A gap analysis is a process in which a subrecipient compares current conditions to its current and future needs. A gap analysis can be conducted to assess housing, infrastructure, and economic development conditions. Subrecipients should provide housing, infrastructure, economic development, or public services gap analysis, as needed, at the local level. Applicants should reference the State's Action Plan as an example.

8.2.2 Minimum Datasets

HHMIDs and MIDs are required to provide the following information at the local level. HHMIDs and MIDs should reference the State's Action Plan as an example. The State can provide FEMA Individual Assistance (IA), FEMA Public Assistance (PA), National Flood Insurance Program (NFIP), and Small Business Administration (SBA) data upon execution of data sharing agreements. Some data sources were not available at the time of the State's unmet needs assessment but are strongly encouraged for analysis at the local level if available at the time of program launch.

8.2.3 Recommended Datasets

HHMIDs and MIDs should consider additional datasets that were not readily available for the State's unmet needs assessment, these additional datasets include but are not limited to local or county government impact or damage assessments, nonprofit or nongovernmental impact assessments, public works or capital planning data.

8.3 Outreach, Engagement and Stakeholder Consultation



Robust local planning efforts are integral to the identification of activities that address remaining localized unmet needs. LRPs will ensure that community engagement and outreach efforts occur, including consultation and collaboration with local governments, nonprofits, advocacy groups and other impacted stakeholders, especially those that cater to vulnerable populations. Seeking input from stakeholders and communities is a requirement of the planning process. Local Recovery Planning should include a variety of methods to inform local officials and the public on the purpose and goals of recovery, mitigation, understanding risks, threats, and hazards in storm impacted areas, and gathering feedback on how to craft projects that will meet the needs of communities as quickly as possible. In addition to gaining feedback, this process will help local stakeholders and members of the public understand what priorities may be able to be supported by CDBG-DR funding and allow them to serve a key role in shaping the outcomes of the plan.

As part of the Local Recovery Planning efforts, HHMIDs and MIDs must consult with local governments, tribal nations, as applicable, organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities to ensure that the proposed recovery programs align with both the communities' needs and the State's obligation to affirmatively further fair housing —when conducting their outreach and engagement activities. LRPs should include examples of how their actions can be expected to equitably benefit protected class groups, including racial and ethnic minorities, and sub-geographies in which residents belonging to such groups are concentrated. Additionally, subrecipients should include examples of how the programs may overcome prior disinvestment in infrastructure and public services for protected class groups.

In order to receive an authorization to use funds or to be eligible to compete in the funding competitions, LRPs must include extensive outreach, engagement and consultation with local government partners, non-governmental organizations, the private sector, tribal governments, and the general public. Outreach should actively pursue environmental justice by encouraging participation from minority, low-income, refugee, evacuee, and immigrant populations. LRPs shall document steps taken to identify and facilitate participation from minority, low-income, refugee, and immigrant populations. Multiple different types of outreach shall be performed, to include contacting groups identified within the plan that represent vulnerable and historically disadvantaged populations. Outreach efforts shall also provide a minimum of seven (7) business days' notice. Outreach events must be scheduled at times that will maximize the opportunity of the identified group to participate.

8.3.1 Public Participation

In the development of the LRP, participation from a broad representation of the public, especially those vulnerable and hard to reach populations, is a critical component to an equitable planning process. At a minimum, HHMIDs and MIDs must host at least one (1) planning charrette in each participating county or municipality, as applicable, during the planning process, noticed at least 14 days prior, that will assemble key stakeholders, including but not limited to planners, citizens, county/city officials, advocates, and others to create and influence recovery and mitigation efforts. HHMIDs and MIDs are required to host at least two (2) public meetings in each participating county or municipality, as applicable, noticed at least 14 days prior, for feedback and comments on the LRP prior to its submission to ADECA. HHMIDs and MIDs are encouraged to host or conduct as much participatory planning events as needed to reach a broad and diverse population. HHMIDs and MIDs must conduct outreach via equitable and accessible methods tailored for hard-to-reach, vulnerable populations, and protected classes to ensure their opportunities for inclusion in the planning process. Any deviation from these minimum requirements with good cause must be formally requested to ADECA for approval prior to the conduct of such charette and or public meeting.

8.3.2 Consultation



Throughout the planning process, HHMIDs and MIDs should consult with various key stakeholders including but not limited to state, county and local agencies and governments, tribal nations (both federally and state recognized tribes if present within HHMID or MID county jurisdictions), nonprofit and nongovernmental groups representing vulnerable or protected classes, and business owners and associations.

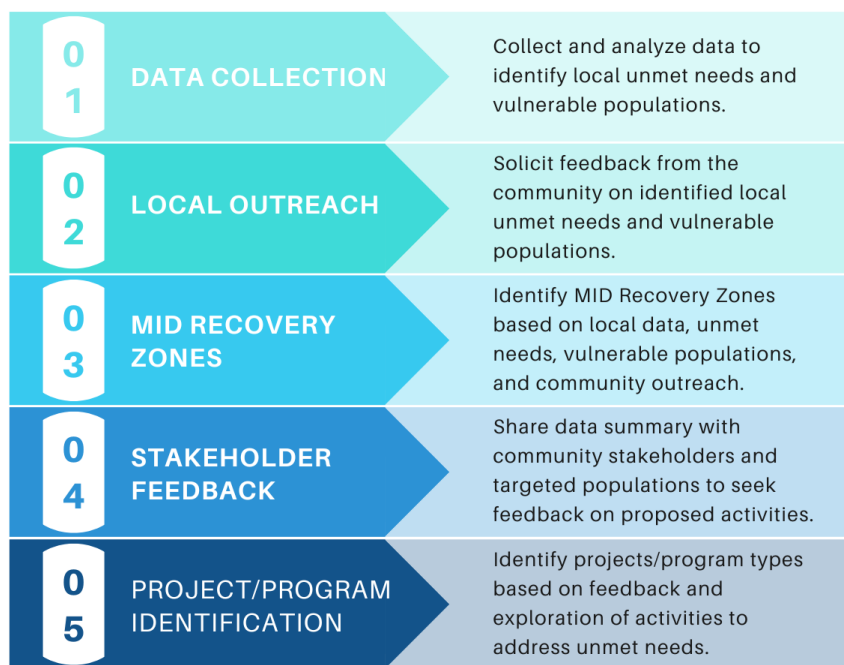
- **HHMIDs:** In order for an LRP to be adopted, the governing board of each HHMID must approve the plan through a majority vote held within a properly noticed public hearing.
- **MIDs:** For MIDs, the LRP must be presented to the governing board for their information.

All comments received at the public hearings must be considered when developing the LRP. Any changes made to the LRP in response to public comments will be included in the final version of the LRP, in addition to a summary of the comments received and the County’s response to each.

8.4 Activity Identification

Project/Program Types

- **HHMIDs** may identify projects and/or programs that support a broader strategy for recovery and mitigation.
- **MIDs** may identify projects only that are in support of a broader strategy for recovery and mitigation.



8.4.1 Activity Descriptions

The LRP must provide descriptions and demonstrate how it will comply with all federal, state, local and program requirements.

8.4.2 National Objective



All activities identified within the LRP must meet a HUD CDBG-DR Program National Objective and seek to provide a benefit to Low- and Moderate Income (LMI) persons; Areas (LMA); or Clientele (LMC), as modified or waived by applicable federal register notices.

8.4.3 Eligible Activities

LRPs should consider activities such as the need to support owner-occupied buyouts; provide repair, replacement, and new construction of affordable multifamily rental housing; hazard mitigation against future disaster; public services (e.g., housing counseling, legal counseling, job training, mental health, general health, etc. (fifteen percent (15%) cap)); and administrative capacity, specifically utilizing the data identified within the local unmet needs assessment. Furthermore, adopted LRPs should consider identifying potential infrastructure project types within the categories of Roads & Bridges; Water Control Facilities; Buildings & Equipment; Utilities; and Parks, Recreation Facilities; etc. supported by data identified within the local unmet needs assessment.

Within this context, the proposed use of funds shall align with the proposed activities rank ordered and prioritized within the LRP. Allocated funds and prioritization of activities should be proportionate to local unmet needs within the HHMID and MID geographies. Proposed uses of funding will create a local budget in support of **eligible activities** in support of:

- Affordable Rental Housing
- Homeowner Buyouts
- Homebuyer Assistance
- Mitigation
- Economic Resilience
- Infrastructure & Public Facility Improvements
- Public Services

8.4.4 Eligible Costs

As detailed in the State's Action Plan, a recipient of federal funds is responsible for ensuring that the costs of its disaster recovery activities are allowable, reasonable, necessary, and cost-effective.

Any exceptions to CDBG-DR program maximum award limitations, as identified in the State's Action Plan, are subject to grant fund availability and ADECA approval. The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as:

- The process used to analyze the circumstances under which an exception was necessary,
- How the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart E—Cost Principles, and
- Justifying the reasonable accommodation requests under Section 504 of the Rehabilitation Act of 1973 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

8.4.5 Eligibility Criteria

Activities identified and prioritized as part of a LRP must benefit low- and moderate-income persons to the maximum extent feasible. Activities must also be an eligible activity under HUD's CDBG-DR program and meet a National Objective of HUD's CDBG-DR Program. Additionally, eligible activities and National Objectives for projects to be submitted to other ADECA programs can be found in their respective program guidelines.



Criteria for ranked projects as part of the Local Recovery Planning process shall include a detailed narrative and data supporting a determination, to the extent possible, for each of the following:

- Meeting of a HUD National Objective
- Benefits to low and moderate income populations, vulnerable groups, protected classes, hard-to-reach populations
- Social vulnerability index (SoVI) score
- Recovery and/or mitigation impact relationship to MID Recovery Zones
- Connection to State and local unmet needs
- Leveraging of other funding sources, if applicable
- Project readiness
- Demonstration of operations and maintenance feasibility

8.4.6 Tieback to the Storm

Per HUD's Office of Community Planning and Development, all funds must be used for "necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure, housing, and economic revitalization." For Disaster Recovery, activities must be disaster-related in that they clearly demonstrate a connection to addressing a direct or indirect impact of the disaster in a Presidentially declared County and be CDBG-DR eligible according to regulations and waivers. The inclusion of mitigation activities in Local Recovery Planning is to detail a strategy that reduces risks and vulnerabilities of people in hazard-prone areas through current technology, reduces the potential impact of natural disasters on new and existing properties, infrastructure, and local economies, and promotes education, outreach and research and development programs to improve the knowledge and awareness among the residents—particularly vulnerable populations and historically underserved communities—and industry about hazards they may face and mitigation alternatives that can reduce vulnerabilities.

Documentation of tieback to the storm is not required for mitigation-only activities.

8.4.7 Program Priorities

The prioritization of activities within adopted LRPs shall include an explanation of how identified activities and projects support the State's priorities:

- Benefits to Low- and Moderate-Income (LMI) Households (80% AMI or less)
- Benefits to vulnerable populations that include protected classes, socially vulnerable and Historically Disadvantaged Populations, for example, those populations residing in a HUD identified [Racially or Ethnically Concentrated Areas of Poverty \(R/ECAP\)](#) Census Tracts

8.4.8 Feasibility

To the greatest extent practicable, activities identified in LRPs should complete a feasibility analysis that will evaluate the successful implementation and operations of the project. Feasibility analyses should be tailored to the type of project identified, for instance housing, infrastructure, or economic development. Key decisions concerning project feasibility may include but not limited to location, land value, project size and type, rent levels, and project cost estimates. Additionally, projects to be pursued should identify the use of CDBG-DR funding within them, as well as detail what actions are required prior to the start of the activity itself, to include providing a timeline to meet basic environmental and procurement requirements, implementation (design, engineering, construction, lease-up, occupancy, etc.) of the activity, and activity close out (final payments, records, etc.). LRPs shall also propose a baseline for measurement of progress for proposed activities, to include milestones. If an activity will potentially leverage other sources of funding, the LRP should note the potential sources that may be leveraged and discuss the requirements and timelines to secure other such funds. Ultimately, the LRP



is a tool for participating HHMIDs and MIDs to plan wisely, set clear expectations, anticipate how to monitor implementation and spending, and use CDBG-DR financing options.

As a planning document, the activities identified within a LRP should not result in any “Choice Limiting Actions.” A “Choice Limiting Action” is any action in which a recipient of ADECA funding commits or expends HUD or non-HUD funds on activities for a project assisted under the U.S. Housing Act that reduces or eliminates the recipient’s opportunity to choose an alternative prior to receiving all associated environmental clearances.

8.4.9 Budget

As a planning document, a detailed and finalized budget is not expected to be included in the LRP. The LRP should create a foundation to articulate potential projects and develop budget estimates in support of seeking funding either through a direct allocation or as part of the Disaster Recovery Housing and Disaster Recovery and Mitigation Non-Housing Competitions. Budget estimates should identify, if applicable:

- Leveraging Funds
- Duplication of Benefits

8.4.10 Timeline and Readiness

Proposed activities must include a description or documentation of the anticipated timeline and its readiness to proceed, if funded. This will ensure activities funded are spent prior to the grant expenditure deadline. Documentation and descriptions may include, but are not limited to identifying environmental review requirements, and any permitting or entitlement requirements.

8.4.11 Partners

A key deliverable of the identification of MID Recovery Zones is the identification of partners that can participate, implement, and carryout activities that address the local unmet needs identified in the LRP. Criteria for partners will be fully detailed in either the grant programs developed by the HHMIDs or the Program Guidelines established in support of the Local Recovery Housing and Local Recovery and Resilience Competitive programs.

9 LRP Submission and Acceptance

9.1 LRP Submission

LRPs must be submitted online via ADECA’s website. See tables below for anticipated program timeline.

LRP submission period	9 months from SRA execution
ADECA LRP review period	60 days after ADECA’s receipt of submission

9.2 LRP Acceptance

ADECA will review submitted LRPs within sixty days of ADECA’s receipt of submission. If ADECA determines that the LRP consists of all necessary information then the plan will be accepted. If the plan requires more information or clarification in a particular section, ADECA will provide detail as to what is still needed. Once additional information is submitted, ADECA will review and if sufficient the plan will be accepted. In all cases, ADECA will notify the appropriate parties of the status of submitted LRP’s.

10 Funding Planning Activities



For both HHMIDs and MIDs, CDBG-DR funds awarded and spent for planning and capacity building costs are considered to address the National Objectives of the CDBG-DR program, as a whole, therefore no documentation of such compliance is required post award (24 CFR 570.208(d)(4)). However, HHMIDs and MIDs must support disaster recovery and mitigation activities in accordance with the LRP.

For HHMIDs, as recipients of direct allocations, the governing board must allocate funds through a majority vote held within a properly noticed public hearing based upon the adopted LRP.

11 LRP Amendments

Governing bodies of the HHMID jurisdictions can amend adopted LRPs based on updated local needs assessments. All LRP amendments will include a chart or table that illustrates how all funds are budgeted and will be published on the HHMID website. Each amendment will describe the changes within the context of the entire adopted LRP.

The current version of the adopted LRP will be viewable as a single document. At a minimum, each amendment will: (1) identify exactly what content is being added, deleted, or changed, (2) clearly illustrate where funds are coming from and where they are moving to, and (3) include a revised budget allocation table that reflects the entirety of all funds, as amended.

HHMID jurisdictions will provide a 30-day comment period prior to submission of all adopted LRP amendments to ADECA. All amendments will be published on ADECA's disaster recovery website and will afford citizens, affect local governments, and interested parties an opportunity to review and comment on the amendment prior to ADECA's acceptance.

Any updates or changes to the adopted LRP in response to public comments will be clearly identified in the final version of the amended and adopted LRP. A summary of the public comments received regarding the amendment, and ADECA's response to each, will be included in the amendment's finalization process for approval locally and acceptance by ADECA.

12 Website

ADECA will maintain a centralized website that permits the general public including individuals and entities awaiting assistance, to see how all grant funds are used and administered. ADECA's website will be maintained in accordance with the ADECA CDBG-DR Grant Administration Manual. Available via www.adeca.alabama.gov.

13 Citizen Complaints

When a unit of local government receives a written complaint concerning its disaster recovery programs or its citizen participation plan, that unit of local government is to follow its complaint resolution process to address those written complaints within a reasonable time, or otherwise when practicable.

At any time, a citizen may directly contact ADECA or HUD to submit comments and complaints concerning a local government's work pertaining to its CDBG-DR grant application, grant administration, and grant program implementation processes. However, citizens are encouraged to first resolve their comments and complaints at the local government level prior to initiating an attempt to involve ADECA or HUD in their comment or complaint resolution process.

All such comments, complaints, and grievances submitted to ADECA or to HUD shall be addressed in writing to the following designees:



ADECA

Alabama Department of Economic and Community Affairs (ADECA)
Community and Economic Development Division
401 Adams Avenue, Room 500; Post Office Box 5690
Montgomery, Alabama 36103-5690

HUD

United States Department of Housing and Urban Development
Birmingham Field Office
Community Planning and Development Division
417 20th Street, North, Suite 700
Birmingham, Alabama 35203

Records of the citizens' comments and complaints that have been received by a local government concerning its CDBG-DR Program, and records of the subsequent actions that have been taken by the local government in response to those comments and complaints, shall be maintained on file at the local government's headquarters office, and shall be made available for public review and inspection upon request.

All verbal complaints the State receives will be considered informal and not subject to the same resolution process described above. ADECA will attempt to resolve any such complaint(s) it receives.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735, or email: hotline@hudoig.gov).

14 Monitoring and Compliance

14.1 Monitoring Reviews

CDBG-DR funds awarded and spent for planning and capacity building costs are considered to address the National Objectives of the CDBG program, so as a whole, no documentation of such compliance is required post award (24 CFR 570.208(d)(4)). Plans should be reviewed and updated as appropriate during the life of the program. The process for citizen complaints and plan amendments is identified within these guidelines and must be followed throughout the life of the program. ADECA reserves the right to monitor all planning efforts and related costs in accordance with its CDBG-DR Monitoring Plan.

14.2 Anti-Fraud, Waste and Abuse

ADECA is committed to upholding the highest level of ethical standards in all areas of its operations. As stewards of the taxpayers' interests, all personnel have a duty to help create and maintain a culture of integrity and opposition to fraud, waste, abuse, and mismanagement, inclusive of full time and part time employees, contractors, grantees, and beneficiaries. ADECA's objective is to eliminate or reduce fraud events to the lowest extent possible to ensure the most effective and efficient use of funds and resources.

To report suspected fraud, waste, and abuse call (877) 219-9598 or by filling out the form found [here](#).

14.3 Procurement and Financial Management

As part of the Capacity Assessment for HHMIDs and MIDs, participating jurisdictions must ensure that every purchase order or other contract includes any clauses required by Federal statutes and executive



orders and their implementing regulations. Additional requirements can be found at 24 CFR 85.36 – Procurement (b) through (i).

Furthermore, Capacity Assessments completed by HHMIDs and MIDs must ensure financial management capabilities in accordance with 24 CFR 200.302 and all referenced requirements. Specifically, participating jurisdictions must:

- expend and account for the Federal award in accordance with state laws and procedures for expending and accounting their own local funds;
- identify, in its accounts, all Federal awards received and expended and the Federal programs under which they were received;
- provide accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements;
- ensure records can identify adequately the source and application of funds for federally-funded activities;
- possess effective control over, and accountability for, all funds, property, and other assets;
- be able to compare expenditures with budget amounts for each Federal award; and
- establish written procedures to implement requirements and determine the allowability of costs.

14.4 Duplication of Benefits

Eligible applicants may have previously received assistance from other sources for the repair of their storm-damaged property. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. §5121 et seq., prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which he/she has previously received financial assistance under any other program, from private insurance, charitable assistance, or any other source.

During the planning process, the participating HHMID and MID jurisdictions should ensure a process is developed in support of any activities identified that allow an applicant to report any and all assistance received from other sources for the repair, replacement, or reconstruction of their storm-damaged property. Previous funds received and reported must be verified during the duplication of benefits (DOB) review process. Not all previous assistance received constitutes a duplication of benefits.

To determine if a duplication of benefit exists, the administrative entity responsible for awarded funding must first consider the “total assistance” available to each applicant. Total assistance includes all reasonably identifiable financial assistance available to the applicant. Total assistance does not include personal assets such as money in a savings account or credit cards. After total assistance has been determined, the administrative entity shall subtract non-duplicative assistance received. Non-duplicative assistance is: (i) assistance provided for a different purpose than awarded funds; or (ii) assistance provided for the same purpose as awarded funds that was expended for a different eligible use.

Duplication of benefits occurs when total assistance received by the applicant exceeds non-duplicative assistance received by the applicant. If a duplication of benefits occurs, the applicant’s award must be reduced by the amount of the DOB received by the applicant.

14.5 Affirmatively Furthering Fair Housing (AFFH)



Local governments, Public Housing Authorities (PHA), States, and Insular Areas must be involved in fair housing planning to ensure follow through on the obligation to affirmatively further the policies of the Fair Housing Act, also known as Affirmatively Furthering Fair Housing (AFFH). These policies include the policy of ensuring that persons are not denied equal opportunities in connection with housing because of their race, color, national origin, religion, disability, sex, or familial status. They also include the policy of overcoming patterns of segregation and the denial of access to opportunity that are part of this nation's history. To be effective, fair housing planning must tackle tough issues. Fair housing planning affects the community as a whole, so all people in the community must have the opportunity to participate in making those decisions. The AFFH rule recognizes that local governments, PHAs, States, and Insular Areas have the responsibility to identify the nature and extent of barriers to fair housing and set goals for what can and should be done to address them. For this reason, the AFFH rule makes community participation an important part of the development of the AFFH and subsequent planning to help ensure the integrity and, ultimately, the success of program participants' efforts to affirmatively furthering fair housing. In other words, subject to review by HUD, local governments, PHAs, States, and Insular Areas will identify the fair housing issues affecting their geographic area, develop planned solutions, and be accountable for resolving the problems using the solutions that they adopt.

As noted in Section 5.1 of these guidelines, to be eligible all activities must have a local government identified as the lead applicant. As a recipient of federal funds, participating local governments must certify to take meaningful actions to further the goals identified in the State of Alabama's AFH and take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

14.6 Records Retention

LRPs and any subsequent amendments must be available online during the life of the program and as part of the records of each HHMID and MID jurisdiction awarded subsequent funding for no less than five years after grant close-out.

The availability of the LRP is in accordance with the requirement that a recipient of federal funds (as part of the subsequent award of competitive funding or authorization to use grant funds based upon the priorities set forth in LRP) must keep records that establish boundaries of a service area(s) and the basis for determining such a boundary, as well as the population served within the service area.

LRPs establish the use of CDBG-DR funds awarded by HUD. As such, the adopted LRPs are the foundation for the activities that follow:

- Showing that the activity is designed to be used by the segment of the population presumed;
- Describes how the nature and location of the activity establishes the beneficiaries;
- Details the demographic data of the target population;
- Demonstrates enhancements that address risks to community lifelines that support health and safety while mitigating against future disasters; and
- Establishes that the activity qualifies and meets the National Objectives of the CDBG-DR Program.