

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

Background

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

The Department provides CDBG-DR and CDBG-MIT grantees with a waiver for the requirement for consistency with the consolidated plan (requirements at 42 U.S.C. 12706, 24 CFR 91.325(a)(5), 24 CFR 91.225(a)(5), 24 CFR 91.325(b)(2), and 24 CFR 91.225(b)(3)). However, as noted in each applicable Federal Register Notice, these waivers only apply until a certain point in time for all grantees in receipt of CDBG-DR or CDBG-MIT funds under supplemental disaster relief appropriations.

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

When the organization administering the CDBG-DR or CDBG-MIT award is a different entity or agency from that which administers the applicable State's or entitlement's annual CDBG program, these entities should coordinate to ensure that the grantee updates its consolidated plan according to these instructions.

Incorporating CDBG-DR and CDBG-MIT funds into Consolidated Plans in the eCon Planning Suite

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

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

Figure 1

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

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Introduction:

Source of Funds	Source	Uses of Funds	Expected Amount Available Year 1	Expected Amount Available Remainder of Con Plan	Narrative Description	Action
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$	\$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$	\$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$	\$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$	\$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	Annual Allocation: \$ Program Income: \$ Prior Year Resources: \$ Total: \$	\$		Add

Step 2: on the next screen (SP-36) select “Other” from the “Anticipated Resources” drop-down Menu. Then Enter “CDBG-DR” or “CDBG-MIT” for “Other Funding Source” as shown in Figure 2 below. Then complete the rest of the screen.

- Grantees should fill in the “Expected Amount Available for Year 1” to reflect the estimated amount of CDBG-DR or CDBG-MIT funding they expect to obligate and expend during the FY.
- Grantees should fill in the “Amount Expected for the remainder of the Consolidated Plan” to reflect the estimated amount of CDBG-DR or CDBG-MIT funding they expect to obligate and expend during the remainder of the Con Plan period.

Figure 2

Consolidated Plans

SP-36 Add Anticipated Resource - 24 CFR 91.320(i)

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Anticipated Resource:
Other Funding Source:
Expected Amount Available Year 1: \$
Amount Expected for the remainder of the Consolidated Plan: \$
Narrative Description:

Other
Continuum of Care
General Fund
Housing Trust Fund
HUD-VASH
LIHTC
Public Housing Capital Fund
Redevelopment Fund
Section 108
Section 811
Shelter Plus Care
SRO-Moderate Rehabilitation
State CDBG Colonias Set-aside
Supportive Housing Program
Tax Credits
Tax Exempt Bond Proceeds
Tax Increment Financing
Other

Source: ☐ public - federal ☐ public - state

Uses of Funds:
☐ Acquisition
☐ Admin and Planning
☐ Conversion and rehab for transitional housing
☐ Economic Development
☐ Financial Assistance
☐ Homebuyer assistance
☐ Homeowner rehab
☐ Housing
☐ Multifamily rental new construction
☐ Multifamily rental rehab
☐ New construction for ownership
☐ Overnight shelter
☐ Permanent housing in facilities
☐ Permanent housing placement
☐ Public Improvements
☐ Public Services
☐ Rapid re-housing (rental assistance)
☐ Rental Assistance
☐ STRMU
☐ Services
☐ Short term or transitional housing facilities
☐ Supportive services
☐ TBRA
☐ Transitional housing
☐ Other

Save and Return | Cancel

Consolidated Plans

SP-36 Add Anticipated Resource - 24 CFR 91.320(i)

Save and Return | Cancel

Anticipated Resource: Other
Other Funding Source: CDBG-DR
Expected Amount Available Year 1: \$
Amount Expected for the remainder of the Consolidated Plan: \$
Narrative Description:

Source: ☐ public - federal ☐ public - state ☐ public - local ☐ private

Uses of Funds:
☐ Acquisition
☐ Admin and Planning
☐ Conversion and rehab for transitional housing
☐ Economic Development
☐ Financial Assistance
☐ Homebuyer assistance
☐ Homeowner rehab
☐ Housing
☐ Multifamily rental new construction
☐ Multifamily rental rehab
☐ New construction for ownership
☐ Overnight shelter
☐ Permanent housing in facilities
☐ Permanent housing placement
☐ Public Improvements
☐ Public Services
☐ Rapid re-housing (rental assistance)
☐ Rental Assistance
☐ STRMU
☐ Services
☐ Short term or transitional housing facilities
☐ Supportive services
☐ TBRA
☐ Transitional housing
☐ Other

Save and Return | Cancel

2. Housing and Homeless Needs Assessment (91.205)

- Grantees should insert language from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan for disaster recovery to integrate into Consolidated Plan comments for this section, or include language from the “mitigation needs assessment” section of their HUD-approved CDBG-MIT Action Plan. As there is extensive information in CDBG-DR or CDBG-MIT Action Plans on recovery or mitigation needs, grantees should include only an abbreviated version of this information related to impact and recovery needs related to housing and homelessness, infrastructure, and economic development on the following screens in the Consolidated Plan template:
 - Housing needs – NA-10
 - Homeless needs – NA-40
 - Infrastructure and economic development needs – NA-50

This information can be included by adding a supplemental text box on any of these screens, as appropriate.

3. Housing Market Analysis (91.210)

- Grantees should insert language from the “impact and unmet needs assessment” or “mitigation needs assessment” section of their HUD-approved CDBG-DR or CDBG-MIT Action Plan to integrate in the Housing Market Analysis section of the Consolidated Plan. As there is extensive information in CDBG-DR and CDBG-MIT Action Plans on recovery or mitigation needs, grantees should include only an abbreviated version of this information related to grantee’s analysis of its housing market.
 - Number of Housing units – MA-10
 - Cost of Housing – MA-15
 - Condition of Housing – MA-20
 - Needs and Market Analysis Discussion – MA-50

This information can be included by adding a supplemental text box on any of these screens, as appropriate.

4. Reflect Goals to be accomplished with CDBG-DR or CDBG-MIT funding on the SP-45 screen.

- This can be done by either 1) creating one goal that will encompass all accomplishments anticipated to result from the CDBG-DR or CDBG-MIT program during the Strategic Planning Period, or 2) by folding anticipated CDBG-DR or CDBG-MIT accomplishments into other program goals on this screen (HUD recommends option 2 so grantees do not have to go back to the year-one ConPlan’s Strategic Plan (SP) screens).
- Annual goals for CDBG-DR or CDBG-MIT during Year 1 should also be included on the AP-20 screen in the Year 1 Annual Action Plan embedded in the Consolidated Plan template and in subsequent year Annual Action Plans carried out during the Strategic Planning period.

5. Projects for CDBG-DR or CDBG-MIT should not be created on the AP-35 screen
- Reference CDBG-DR or CDBG-MIT allocation priorities in the text box on this screen, as shown in Figure 3 below, and provide a link to the grantee's website where its CDBG-DR or CDBG-MIT Action Plan is posted as a resource for parties that wish to find out more.

Figure 3

Annual Action Plan (2019-1)

AP-35 Projects - (Optional)

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*** Indicates Required Field**

***Introduction:**

B / **I** **U** |
 [List Bulleted] [List Numbered] [Link] [Unlink] [Image] [Table] [Code] [Quote] [HTML]

Projects

No Projects have been added to this Annual Action Plan.

[Add an Existing Project](#)

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs:

B / **I** **U** |
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DISASTER	APPLICABLE FEDERAL REGISTER NOTICE(S)	CONSOLIDATED PLAN CONSISTENCY – END OF WAIVER APPLICABILITY
2023- 2024 Events	90 FR 4759 (Published January 16, 2025)	<u>90 FR 1754 (Published January 8, 2025):</u> If the grantee is not scheduled to submit a new three-to five-year consolidated plan within the next two years, the grantee must update its existing three-to five-year consolidated plan to reflect disaster-related needs no later than 24 months after the applicability date of the grantee’s applicable Allocation Announcement Notice.
2020- January 2023 Events	90 FR 21328 (Published May 19, 2025) 88 FR 82982 (Published November 27, 2023), 88 FR 32046 (Published May 18, 2023); 88 FR 3198 (Published January 18, 2023); 87 FR 36869 (Published June 21, 2022); 87 FR 31636 (Published May 24, 2022); 87 FR 6364 (Published February 3, 2022)	<u>87 FR 6364 (Published February 3, 2022):</u> If the grantee is not scheduled to submit a new three-to five-year consolidated plan within the next two years, the grantee must update its existing three-to five-year consolidated plan to reflect disaster-related needs no later than 24 months after the applicability date of the grantee’s applicable Allocation Announcement Notice.
2017-2019 Events	87 FR 75644 (Published December 9, 2022); 87 FR 36869 (Published June 21, 2022); 86 FR 569 (Published January 6, 2021); 85 FR 60821 (Published September 28, 2020); 85 FR 50041 (Published August 17, 2020); 85 FR 10182 (Published February 21, 2020); 85 FR 4681 (Published January 27, 2020); 84 FR 4836 (Published February 19, 2019); 83 FR 40314 (Published August 14, 2018); 83 FR 5844 (Published February 9, 2018)	<u>85 FR 4681 (Published January 27, 2020):</u> Grantees are encouraged to incorporate disaster-recovery needs into their consolidated plan updates as soon as practicable, but any unmet disaster-related needs and associated priorities must be incorporated into the grantee’s next consolidated plan update no later than its Fiscal Year 2020 update for 2017 disasters and Fiscal Year 2022 for 2018 and 2019 disasters.
Louisiana Floods and Other 2016 Events	85 FR 60821 (Published September 28, 2020); 85 FR 50041 (Published August 17, 2020); 84 FR 4836 (Published February 19, 2019); 82 FR 36812 (Published August 7, 2017); 82 FR 5591 (Published January 18, 2017); 81 FR 83254 (Published November 21, 2016)	<u>81 FR 83254 (Published November 21, 2016):</u> If the grantee is not scheduled to submit a new 3–5 year consolidated plan within the next 2 years, HUD expects each grantee to update its existing 3–5 year consolidated plan to reflect disaster related needs no later than 24 months after the effective date of this notice (November 28, 2018). Additionally, grantees are encouraged to incorporate disaster-recovery needs into their consolidated plan updates as soon as practicable, but any unmet disaster related needs and associated priorities must be incorporated into the grantee’s next consolidated plan update no later than its Fiscal Year 2019 update.

DISASTER	APPLICABLE FEDERAL REGISTER NOTICE(S)	CONSOLIDATED PLAN CONSISTENCY – END OF WAIVER APPLICABILITY
2023- 2024 Events	90 FR 4759 (Published January 16, 2025)	<u>90 FR 1754 (Published January 8, 2025):</u> If the grantee is not scheduled to submit a new three-to five-year consolidated plan within the next two years, the grantee must update its existing three-to five-year consolidated plan to reflect disaster-related needs no later than 24 months after the applicability date of the grantee’s applicable Allocation Announcement Notice.
CDBG-MIT for 2015-2018 Events	86 FR 561 (2018 CDBG-MIT) (Published January 6, 2021); 85 FR 4676 (CDBG-MIT Allocation for Puerto Rico) (Published January 27, 2020); 84 FR 47528 (CDBG-MIT Allocation for USVI) (Published September 10, 2019); 84 FR 45838 (CDBG-MIT Main Notice) (Published August 30, 2019)	<u>86 FR 561 (2018 CDBG-MIT) (Published January 6, 2021):</u> For a grantee allocated CDBG– MIT funds under Public Law 116–20, this waiver applies only until a grantee submits its next full (3–5 year) consolidated plan, or no later than its Fiscal Year 2022. <u>84 FR 45838 (CDBG-MIT Main Notice) (Published August 30, 2019):</u> This waiver applies only until the grantee submits its next full (3–5 year) consolidated plan, or for 24 months after the applicability date of this notice, whichever is sooner (September 4, 2021).
Hurricane Joaquin, Hurricane Patricia, and Other Flood Events Occurring in 2015	85 FR 60821 (Published September 28, 2020); 85 FR 50041 (Published August 17, 2020); 84 FR 4836 (Published February 19, 2019); 82 FR 36812 (Published August 7, 2017); 81 FR 39687 (Published June 17, 2016)	<u>81 FR 39687 (Published June 17, 2016):</u> If the grantee is not scheduled to submit a new 3–5 year consolidated plan within the next 2 years, HUD expects each grantee to update its existing 3–5 year consolidated plan to reflect disaster-related needs no later than 24 months after the effective date of this notice (June 22, 2018). Additionally, grantees are encouraged to incorporate disaster-recovery needs into their consolidated plan updates as soon as practicable, any unmet disaster-related needs and associated priorities must be incorporated into the grantee’s next consolidated plan update no later than its Fiscal Year 2017 update.
Hurricane Sandy and other disasters occurring in 2011, 2012, and 2013	85 FR 60821 (Published September 28, 2020); 84 FR 4836 (Published February 19, 2019); 82 FR 61320 (Published December 27, 2017); 82 FR 36812 (Published August 7, 2017); 82 FR 9753 (Published February 8, 2017); 81 FR 54114 (Published August 15, 2016); 81 FR 36557 (Published June 7, 2016); 81 FR 7567 (Published February 12, 2016); 80 FR 72102 (Published November 18, 2015); 80 FR 51589 (Published August 25, 2015); 80 FR 26942 (Published May 11, 2015); 80 FR 17772 (Published April 2, 2015); 80 FR 1039	<u>78 FR 14329 (Published March 5, 2013):</u> If not already completed, HUD expects grantees to update their full consolidated plan to reflect disaster-related needs no later than its Fiscal Year 2015 consolidated plan update.

DISASTER	APPLICABLE FEDERAL REGISTER NOTICE(S)	CONSOLIDATED PLAN CONSISTENCY – END OF WAIVER APPLICABILITY
2023- 2024 Events	90 FR 4759 (Published January 16, 2025)	<u>90 FR 1754 (Published January 8, 2025):</u> If the grantee is not scheduled to submit a new three-to five-year consolidated plan within the next two years, the grantee must update its existing three-to five-year consolidated plan to reflect disaster-related needs no later than 24 months after the applicability date of the grantee’s applicable Allocation Announcement Notice.
	(Published January 8, 2015); 79 FR 62182 (Published October 16, 2014); 79 FR 60490 (Published October 7, 2014); 79 FR 40133 (Published July 11, 2014); 79 FR 31964 (Published June 3, 2014); 79 FR 17173 (Published March 27, 2014); 78 FR 76154 (Published December 16, 2013); 78 FR 69104 (Published November 18, 2013); 78 FR 52560 (Published August 23, 2013); 78 FR 46999 (Published August 2, 2013); 78 FR 45551 (Published July 29, 2013); 78 FR 32262 (Published May 29, 2013); 78 FR 23578 (Published April 19, 2013); 78 FR 14329 (Published March 5, 2013)	
Multiple Disasters - 2011	84 FR 4836 (Published February 19, 2019); 77 FR 60708 (Published October 4, 2012); 77 FR 22583 (Published April 16, 2012)	<u>77 FR 22583 (Published April 16, 2012):</u> While grantees are encouraged to incorporate disaster recovery needs into their consolidated plan updates as soon as practicable, any unmet disaster-related needs and associated priorities should be incorporated into the grantee’s next consolidated plan update following the expiration of the 30-month waiver period. Note that the 30-month requirement does not apply to any non-entitlement community receiving funds under this Notice.
Severe Storms and Flooding - 2010	76 FR 20998 (Published April 14, 2011); 75 FR 69097 (Published November 10, 2010)	<u>75 FR 69097 (Published November 10, 2010):</u> When grantee first updates its strategic plan priorities (and the full consolidated plan) following the disaster.
Multiple Disasters- 2008	75 FR 65368 (Published October 22, 2010); 74 FR 41146 (Published August 14, 2009); 74 FR 7244 (Published February 13, 2009); 73 FR 77818 (Published December 19, 2008); 73 FR 52870 (Published September 11, 2008)	<u>73 FR 52870 (Published September 11, 2008):</u> When grantee first updates its consolidated plan priorities following the disaster.
Hurricanes Katrina, Rita, Wilma - 2005	74 FR 56206 (Mississippi) (Published October 30, 2009); 73 FR 75733 (Mississippi) (Published December 12, 2008); 73 FR 61148 (Louisiana) (Published October 15, 2008); 73 FR 58612 (Alabama) (Published October 7,	<u>71 FR 7666 (Published February 13, 2006):</u> When grantee first updates its consolidated plan priorities following the disaster

DISASTER	APPLICABLE FEDERAL REGISTER NOTICE(S)	CONSOLIDATED PLAN CONSISTENCY – END OF WAIVER APPLICABILITY
2023- 2024 Events	90 FR 4759 (Published January 16, 2025)	<u>90 FR 1754 (Published January 8, 2025):</u> If the grantee is not scheduled to submit a new three-to five-year consolidated plan within the next two years, the grantee must update its existing three-to five-year consolidated plan to reflect disaster-related needs no later than 24 months after the applicability date of the grantee’s applicable Allocation Announcement Notice.
	2008); 73 FR 46312 (Published August 8, 2008); 72 FR 70472 (Louisiana) (Published December 11, 2007); 72 FR 61788 (Mississippi) (Published October 31, 2007); 72 FR 48804 (Published August 24, 2007); 72 FR 48808 (Mississippi) (Published August 24, 2007); 72 FR 10014 (Louisiana) (Published March 6, 2007); 72 FR 10020 (Mississippi) (Published March 6, 2007); 71 FR 63337 (Published October 30, 2006); 71 FR 62372 (Mississippi) (Published October 24, 2006); 71 FR 51678 (Florida) (Published August 30, 2006); 71 FR 43622 (Texas) (Published August 1, 2006); 71 FR 34448 (Alabama) (Published June 14, 2006); 71 FR 34457 (Mississippi) (Published June 14, 2006); 71 FR 34451 (Louisiana) (Published June 14, 2006); 71 FR 7666 (Published February 13, 2006)	
Multiple Disasters - 2003 - 2004	70 FR 21437 (Maryland) (Published April 26, 2005); 69 FR 72100 (Published December 10, 2004)	<u>69 FR 72100 (Published December 10, 2004):</u> When the grantee first updates its consolidated plan following the disaster.
World Trade Center- 2001	82 FR 4911 (Published January 17, 2017); 76 FR 52340 (Published August 22, 2011); 69 FR 19211 (Published April 12, 2004); 68 FR 26640 (Published May 16, 2003); 67 FR 36017 (Published May 22, 2002); 67 FR 12042 (Published March 18, 2002); 67 FR 5845 (Published February 7, 2002); 67 FR 4164 (Published January 28, 2002)	<u>67 FR 4164 (Published January 28, 2002):</u> Waiver does not expire