



STATE OF NEBRASKA DR-4420 CDBG-DR PLANNING PROGRAMS FREQUENTLY ASKED QUESTIONS (FAQS)

Last Updated: December 2, 2021, Version 1

FREQUENTLY ASKED QUESTIONS

This document remains effective until it is amended, superseded, or rescinded.

NEBRASKA DEPARTMENT OF ECONOMIC DEVELOPMENT, 301 CENTENNIAL MALL SOUTH, LINCOLN, NE 68509, opportunity.nebraska.gov

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PURPOSE

In early 2019, the State of Nebraska suffered record-breaking damage due to severe winter weather (Winter Storm Ulmer), straight-line winds, and flooding, all of which contributed to a major disaster declaration (DR-4420) under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act). The State is receiving a \$108,938,000 grant through the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant – Disaster Recovery (CDBG-DR) Program to support long-term recovery efforts. A portion of these funds will be used to implement the **Planning Programs** described herein.

This document is intended to provide an overview of the **Planning Programs** to potential applicants, including details regarding program eligibility and applicable cross-cutting federal requirements. This document may be updated as the program is finalized and implemented.

See the Nebraska Department of Economic Development's (DED) CDBG-DR website, https://opportunity.nebraska.gov/cdbg_dr/, for updates and additional program information.



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RECORD OF CHANGES

The following table summarizes changes to these FAQs.

Date Approved	Version Number	Description of Change
12/02/2021	1	Initial publication



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GENERAL PROGRAM QUESTIONS

PLA001. WHAT ARE PLANNING COSTS?

Costs for creating a plan under Nebraska's CDBG-DR Planning Programs, including data gathering, studies, analysis, and preparation of plans.

PLA002. CAN PLANNING PROGRAM FUNDS BE USED FOR IMPLEMENTATION ACTIVITIES?

No. HUD guidance restricts eligible planning costs to those associated with developing the Plan, including data gathering, studies, analysis, and preparation of plans. Construction costs or costs for carrying out plans are not eligible under planning programs.

Any planning activities related to program implementation may be eligible as an Activity Delivery Cost (ADC) but are not eligible under the planning programs.¹ For example, a Subrecipient of the Affordable Housing Construction Program may incur eligible costs related to site planning or project planning. Such costs could be charged as ADCs under the associated award and would **not** be charged to these planning programs.

PLA003. WHAT ARE THE LEGAL REGULATIONS THAT APPLY TO PLANNING PROGRAMS?

All planning programs and associated parties—including contractors, Subrecipients, and other entities—are required to maintain compliance with regulations set forth in the Action Plan and DED's policies and procedures for the Community Development Block Grant – Disaster Recovery (CDBG-DR) Program, including 2 CFR Part 200, 24 CFR Part 570, and the Federal Register Notices published on:

- June 20, 2019 (84 FR 28836), which clarifies duplication of benefits requirements in the CDBG-DR Program.
- January 27, 2020 (85 FR 4681), which is the notice for 2019's CDBG-DR appropriations.
- February 21, 2020 (85 FR 10182), which corrects 85 FR 4681.
- January 6, 2021 (86 FR 569), which provides COVID-19 waivers to 2019 disasters.

¹ Activity Delivery Costs (ADCs) are costs incurred by a grantee or subrecipient directly related to delivery of a specific CDBG-DR project or service to a beneficiary. Not required to be tied to a specific address but must be tied to delivering CDBG-DR eligible project/units. For more information and guidance on CDBG-DR Costs, see [CDBG-DR Cost Types Summary](#).



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RISK AWARENESS PLANNING PROGRAM FAQS

RAP001. WHAT IS THE PURPOSE OF THE RISK AWARENESS PLANNING PROGRAM?

The Risk Awareness Planning Program is designed to **reduce risk exposure from private levees and levee-like structures during floods, storms, and other disasters**. Research from this effort will inform plan design and guidance to help levee owners and communities reduce and mitigate against future risks.

RAP002. WHAT IS THE TIMELINE FOR THE RISK AWARENESS PLANNING PROGRAM?

The Program will be implemented in two phases. Implementation is anticipated to begin in 2022.

PHASE I: DISCOVERY AND PLANNING

- Identify necessary data sources
- Compile data in GIS
- Determine risk assessment methodology
- Complete scoping analysis
- Produce draft outreach meeting products

PHASE II: OUTREACH

- Engage the Steering Committee to design an outreach strategy
- Finalize the engagement timeline
- Create an online tool to capture and compile community information
- Hold outreach meetings, in-person if possible, and release meeting notes

RAP003. HOW ARE DED, NEDNR, AND NEMA IMPLEMENTING THE RISK AWARENESS PROGRAM?

DED will administer the program in collaboration with subject matter experts at the Nebraska Department of Natural Resources (NeDNR) and the Nebraska Emergency Management Agency (NEMA), which will form the Steering Committee, along with the selected contractor and any other relevant agencies.

Program implementation will be contracted under a competitive procurement.



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HOUSING RESILIENCE PLANNING PROGRAM FAQS

HRP001. WHAT IS THE PURPOSE OF THE HOUSING RESILIENCE PLANNING PROGRAM?

DED designed the Housing Resilience Planning Program (the Program) to **make residential communities in the State of Nebraska more resilient to future floods and disasters**. This Program uses CDBG-DR funds to help local communities develop a Housing Plan that accounts for resiliency considerations. Housing Plans must focus on one or more of the following areas:

- **Housing recovery:** Gather data about the damages to their existing housing stock to inform future program implementation that will support an expedited recovery after disasters.
- **Housing resilience:** Identify risks and vulnerabilities and inform actionable strategies that increase resilience against future disasters.
- **Affordable housing:** Develop programs that preserve existing affordable housing and encourage the development of new affordable housing.

For example, an Applicant might apply for an Affordable Housing Plan that includes data gathering and analysis of housing resiliency and recovery.

HRP002. WHAT IS THE TIMELINE FOR THE HOUSING RESILIENCE PLANNING PROGRAM?

The Housing Resilience Planning Program is expected to take place during a two-year period, from 2022 to 2023. It will be implemented using a three-phased approach for procurement and implementation.

Phase	Activities
Phase 1: Notice of Funding Opportunity (NOFO)	DED determines which entities are eligible and releases a NOFO informing them that they can apply, how to apply, and what to include in the application.
Phase 2: Applicant Selection	Eligible entities may apply for funding during the application period, which is expected to open in Spring 2022. DED will select Applicants based on prioritization detailed in the Action Plan.
Phase 3: Plan Development	Selected Subrecipients will conduct the planning process in 2023 and produce a draft Plan that undergoes a 30-day public comment period and then becomes the Final Plan.



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HRP003. WHO IS ELIGIBLE FOR THE HOUSING RESILIENCE PLANNING PROGRAM?

Eligible applicants and activities under the Housing Resilience Planning Program are described in the table below. Note that **all selected Subrecipients must be in a HUD-defined MID areas.**

Eligible Applicants	Eligible Activities	Eligible Locations
<ul style="list-style-type: none">• Counties• Municipalities• Economic development districts	<ul style="list-style-type: none">• Must focus on at least one of the following:<ul style="list-style-type: none">○ Housing recovery○ Housing resiliency○ Affordable housing	<ul style="list-style-type: none">• Dodge County• Douglas County• Sarpy County

HRP004. HOW WILL DED SELECT APPLICANTS FOR THE HOUSING RESILIENCE PLANNING PROGRAM?

DED's selection process will focus on verifying eligibility, including project location in the HUD-defined MID areas. DED will also prioritize Applicants based on how well they support populations with disparities in access to opportunities, as identified in the Action Plan by the following:

- Poverty areas;
- School proficiency;
- Labor market engagement;
- Jobs proximity;
- Transportation costs;
- Transit trips index; and
- Environmental health indicator.

Additional detail regarding the application structure and process is forthcoming.



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HRP005. WHAT IS THE PROCESS TO DEVELOP A HOUSING PLAN UNDER THE HOUSING RESILIENCE PLANNING PROGRAM?

DED has mapped out the planning process with eight milestones under four stages of plan development to guide Subrecipients through the planning process. This is a roadmap only; applicants may structure their projects in numerous ways, so long as they meet all eligibility requirements. Actual planning documents may include additional stages and/or milestones, but should at a minimum include the following:

Phase	Activities
Phase 1: Establishing the Outlook	<p>Milestone 1: Participation Strategy. Develop and present community participation mechanisms and introduce the planning process to residents.</p>
	<p>Objective: Lay the foundation for a participatory and equitable planning process by developing mechanisms that encourage and strengthen collaboration. The Participation Strategy should reflect these mechanisms and outline methods for meetings, information gathering, and feedback.</p>
	<p>Expected tasks:</p>
	<ul style="list-style-type: none"> • Introduce the program, tools, and planning process.
	<ul style="list-style-type: none"> • Create a Working Committee.
	<ul style="list-style-type: none"> • Discuss the creation of a committee for implementation, monitoring, and follow-up of the Plan.
	<ul style="list-style-type: none"> • Develop a Participation Strategy
	<p>Milestone 2: Needs Assessment. Develop, evaluate, and present data and existing conditions related to the community.</p>
	<p>Objectives: Identify, collect, and analyze quantitative and qualitative data associated with the existing housing in the community and the impacts and stressors on housing during associated allocation(s). This is a unique opportunity to implement participatory exercises to collect community housing assets, experiences, and stories.</p>
	<p>Expected tasks:</p>



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Phase	Activities
	<ul style="list-style-type: none"> • Community data collection (existing conditions, recovery and resilience initiatives, community assets, threats, laws, plans, and regulations); • Data analysis; and • Presentation and validation of findings. <p>Expected deliverables:</p> <ul style="list-style-type: none"> • Participation Strategy validated by community; • Copy of the presentation to the community; and • Documentation of participatory process, including: <ul style="list-style-type: none"> ○ Community feedback; ○ Meeting notes; ○ Images of meetings and participatory dynamics; ○ Other supporting documents related to the tasks.
<p>Phase 2: Vulnerability and Risk Analysis</p>	<p>Milestone 3: Analysis. Analyze and present impacts, stressors, and susceptibility and sensitivity of community assets.</p> <p>Objective: Identify the housing resilience needs the community wants to address through a vulnerability and risk analysis that takes into consideration exposure and sensitivity to threats and the adaptive capacity of the housing stock and community.</p> <p>Expected tasks:</p> <ul style="list-style-type: none"> • Threat exposure analysis; • Threat sensitivity analysis; • Adaptive capacity analysis; • Risk analysis; and



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Phase	Activities
	<ul style="list-style-type: none"> • Development, presentation, and validation of resilience needs. <p>Expected deliverables:</p> <ul style="list-style-type: none"> • List of resilience needs; • Tables and analysis; • Copy of presentation to the community; and • Documentation of participatory processes, including: <ul style="list-style-type: none"> ○ Community feedback; ○ Meeting notes; ○ Images of meetings and participatory dynamics; and ○ Other supporting documents related to the tasks.
<p>Phase 3: Definition and Prioritization of Resilience Actions</p>	<p>Milestone 4: Identification of Resiliency Actions. Develop and present resilience actions.</p> <p>Objective: Identify, develop, and prioritize the resilience actions that the community wants to implement to address the resilience needs identified in Phase 2.</p> <p>Expected tasks:</p> <ul style="list-style-type: none"> • Establish the resilience vision and goals; • Develop resilience objectives; • Identify and analyze resilience actions; • Prioritize resilience actions; and • Present and validate resilience actions. <p>Expected deliverables:</p> <ul style="list-style-type: none"> • Tables and analysis; • List of prioritized resilience actions;



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Phase	Activities
	<ul style="list-style-type: none"> • Copy of the presentation to the community; and • Documentation of participatory processes, including: <ul style="list-style-type: none"> ○ Community feedback; ○ Meeting notes; ○ Images of meetings and participatory dynamics; and ○ Other supporting documents related to the tasks.
<p style="text-align: center;">Phase 4: Implementing, Monitoring, Evaluating, and Adjusting the Plan</p>	<p>Milestone 5: Implementation Strategy. Develop tools for implementation and evaluation of Plans.</p>
	<p>Objective: Facilitate the development of community strategies for implementing the Plan, taking into consideration estimated costs, capacity, and available and projected resources.</p>
	<p>Expected tasks:</p>
	<ul style="list-style-type: none"> • Develop an implementation strategy for the Plan;
	<ul style="list-style-type: none"> • Develop monitoring mechanisms and implementation evaluation; and
	<ul style="list-style-type: none"> • Agree on revisions to the Plan.
	<p>Milestone 6: First Draft. Present the first draft of the Plan for public comments.</p>
<p>Objectives: Develop and present the first draft of the Plan for community feedback.</p>	
<p>Expected tasks:</p>	
<ul style="list-style-type: none"> • Present the first draft of the Plan to the community for public comment. 	
<p>Milestone 7: Final Draft. Present the final draft of the Plan for public comments.</p>	
<p>Objective: Incorporate community feedback, then develop,</p>	



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Phase	Activities
	publish, and request approval from the community for the final draft of the Plan.
	Expected tasks:
	<ul style="list-style-type: none"><li data-bbox="597 663 1170 701">• Incorporate comments into the Plan; and
	<ul style="list-style-type: none"><li data-bbox="597 726 1395 764">• Receive community approval for the final draft of the Plan.
	Milestone 8: Submission of the Plan. Present the final Plan to the community.
	Objective: Familiarize the community with the Plan.
	Expected tasks:
	<ul style="list-style-type: none"><li data-bbox="597 999 1097 1037">• Present the Plan to the community;
	<ul style="list-style-type: none"><li data-bbox="597 1062 1133 1100">• Incorporate community feedback; and
	<ul style="list-style-type: none"><li data-bbox="597 1125 1398 1163">• Post the final Plan where community members can view it.
	Expected deliverables:
	<ul style="list-style-type: none"><li data-bbox="597 1251 1295 1289">• Implementation strategy for each resilience action;
	<ul style="list-style-type: none"><li data-bbox="597 1314 786 1352">• Draft Plan;
	<ul style="list-style-type: none"><li data-bbox="597 1377 1089 1415">• Community outreach presentation;
	<ul style="list-style-type: none"><li data-bbox="597 1440 786 1478">• Final Plan;
	<ul style="list-style-type: none"><li data-bbox="597 1503 1321 1541">• Documentation of participatory processes, including:
<ul style="list-style-type: none"><li data-bbox="691 1566 1024 1604">○ Community feedback;	
<ul style="list-style-type: none"><li data-bbox="691 1629 932 1667">○ Meeting notes;	
<ul style="list-style-type: none"><li data-bbox="691 1692 1414 1730">○ Images of meetings and participatory dynamics; and	
<ul style="list-style-type: none"><li data-bbox="691 1755 1370 1793">○ Other supporting documents related to the tasks.	