COMMUNITY DEVELOPMENT BLOCK GRANT - MITIGATION (CDBG-MIT)  
FREQUENTLY ASKED QUESTIONS

Q1. **What are the federal rules and regulations that Puerto Rico must follow in administering CDBG-MIT funds?**

A1. HUD rules for the CDBG-MIT program are located in two (2) Federal Register notices for Puerto Rico:

- The main notice at Federal Register Notice Vol. 84 No. 169 (Friday, August 30, 2019) 84 FR 45838; and

Federal Register 84 FR 45838, released on August 30, 2019, describes “grants requirements and procedures, including waivers and alternative requirements, applicable to CDBG-MIT funds only”. However, the notice did not include an allocation of CDBG-MIT funds for the Government of Puerto Rico.

Federal Register 85 FR 4676, released on January 27, 2020, allocated $8.285 billion of CDBG-MIT funds to Puerto Rico, and clarifies alternative and additional requirements that pertain specifically to Puerto Rico. One of the modifications includes a lower dollar threshold for Covered Projects.

Q2. **When will CDBG-MIT funding be available?**

A2. The first step in accessing these mitigation funds is to develop and submit an Action Plan to HUD that includes a data-driven risk-based mitigation needs assessment, incorporates community input gathered through a robust outreach and engagement process, and describes how funding will be used to increase Puerto Rico’s resilience through mitigation activities that lessen the impact of future hazards. The Action Plan is due to the Department of Housing and Urban Development (HUD) by December 3, 2020, at which point HUD will have up to **sixty (60) calendar days** to review and approve the plan. A grant agreement awarding funds to Puerto Rico is not anticipated until Spring 2021.

Q3. **What opportunity will Puerto Rico agencies, municipalities, Non-government organizations (NGOs), the business community, federal agencies, and the general public have for input in creating CDBG-MIT programs and the CDBG-MIT Action Plan?**
A3. The Puerto Rico Department of Housing (PRDOH) is committed to the consideration and incorporation of community input for this new type of grant funding created under HUD. Building on the relationships formed during hurricane recovery efforts under the CDBG-Disaster Recovery (CDBG-DR) Program, PRDOH has identified key stakeholder groups encompassing 190+ entities for participation in the CDBG-MIT planning effort and encourages others to join by registering through the CDBG-MIT website at https://cdbg-dr.pr.gov/en/cdbg-mit/. Stakeholder outreach for the CDBG-MIT Action Plan initiated in May 2020 focused on data-sharing and planning alignment with local and federal agencies. Engagement has since grown and now continues with federal entities, additional Government of Puerto Rico agencies, municipalities, non-governmental organizations (NGOs), and private sector.

Citizens shall be engaged directly through a public survey available at https://cdbg-dr.pr.gov/en/cdbg-mit/ in August 2020, to gather input on mitigation needs, and through pre-announced island-wide and regional events. Citizens may also provide input during a forty-five (45) calendar day period, at a minimum. The comment period for the mitigation plan is expected to begin in early September 2020. Public hearings will be announced at https://cdbg-dr.pr.gov/cdbg-mit/ fifteen (15) calendar days prior to the date of the hearing and further communicated through social media and new outlets, where practicable.

Q4. How is PRDOH addressing the need for community participation amidst the ongoing COVID-19 community safety concerns?

A4. Public Safety is a priority concern for PRDOH, its employees, and the citizens we serve. Given the current situation with Coronavirus Disease 2019 (COVID-19), PRDOH has embraced the most vigorous use of technology for stakeholder meetings and the dissemination of public information. PRDOH utilizes the CDBG-MIT webpage at https://cdbg-dr.pr.gov/en/cdbg-mit/, electronic mail communication, and social media to share information about participatory planning opportunities and program information. PRDOH will also leverage, to the extent feasible, other traditional media outlets to raise public awareness around opportunities to participate such as the citizen survey and public hearing events. PRDOH has engaged a community of NGOs well known for connecting with the citizens of Puerto Rico in participatory events to share best practices with PRDOH in a Thought Leader Roundtable forum. Through these partnerships, PRDOH intends to leverage the public relation skills of these organizations for the greater benefit of the people.
Acknowledging the safe practice of social distancing, PRDOH will continue to offer web-based communication solutions throughout the planning process and into the implementation of the CDBG-MIT Program. We rely on web-based platforms that allow for collaboration and formal input. Requests for alternative forms of engagement may be submitted for PRDOH consideration by emailing CDBG-MIT@vivienda.pr.gov.

Q5. How will CDBG-MIT dollars be spent? What will the programs be? What entities and what activities will be eligible?

A5. As with the CDBG-DR Program, a separate CDBG-MIT Action Plan will be provided to HUD for approval of strategically designed mitigation programs informed by the data-driven risk-based needs assessment. In addition to supporting data and research, the Action Plan will include budget allocations to planned programs and a description of each program’s activities and the entities eligible to apply. During the CDBG-MIT Action Plan phase, extending through July 2020, PRDOH has been collecting project needs through input from stakeholders to develop programs that truly address the mitigation needs of the Island.

These programs will be posted for public input when the Action Plan is published for a minimum of forty-five (45) calendar day-term or more public comment period, before the plan is finalized and submitted to HUD for final consideration.

Q6. How will current and planned CDBG-DR programs coordinate with CDBG-MIT programs?

A6. PRDOH is currently evaluating high-impact opportunities for strategic mitigation funding and is considering, as part of this evaluation, the potential for CDBG-MIT programs to not only enhance CDBG-DR funded programs but also mitigate the impacts of future hazards.

Q7. CDBG-DR Infrastructure programs will be launched and operating prior to the anticipated CDBG-MIT grant agreement. Can projects be designated for CDBG-MIT funding in the interim?

A7. Part of the research and outreach for the CDBG-MIT Action Plan will be the preliminary identification of potential mitigation activities, which may include specific projects. In fact, projects costing fifty million dollars ($50,000,000) or greater and having at least twenty-five million dollars ($25,000,000) of CDBG funds are considered Covered Projects and must be justified in the Action Plan or subsequent amendments (see more
on Covered Projects below). However, no commitment of CDBG-MIT funds can be made until final HUD approval of the Mitigation Action Plan and the release of funds through a Grant Agreement. All projects funded under CDBG-MIT must meet eligibility requirements and be in compliance with Federal Register Vol. 84, No. 169 (August 30, 2019), 84 FR 45838, and Federal Register Vol. 85, No. 17 (January 27, 2020), 85 FR 4676.

Q8. How will Mitigation Projects be evaluated and chosen?

A8. The Federal Register Notice requires that all mitigation projects undergo a rigorous evaluation, using several lenses. The specific criteria for Mitigation Projects will be described in the CDBG-MIT Action Plan and further defined in Program Guidelines and any procurements or Notice of Funding Availability (NOFA) announcements that are produced.

Q9. What is a Covered Project?

A9. HUD defines a Covered Project for Puerto Rico as “an infrastructure project having a total project cost of fifty million dollars ($50,000,000) or more, with at least twenty-five million dollars ($25,000,000) of CDBG funds (regardless of source (e.g., CDBG-DR, CDBG-MIT, or CDBG)).” Covered Projects must be published in the CDBG-MIT Action Plan or subsequent amendments, and will be subjected to additional requirements including but not limited to:

- Demonstrating consistency with the risk-based mitigation needs assessment;
- Meeting additional national objective criteria specific to Covered Projects;
- Demonstrating long-term efficacy and sustainability, including operations and maintenance; and
- Providing a demonstration of benefits through an acceptable benefit-cost analysis.

More information regarding Covered Projects will be provided as the planning process progresses.

Q10. Can CDBG-MIT funds be used to restore, enhance, and mitigate disasters for the electrical power system?

A10. Currently, Puerto Rico is prohibited from using CDBG-MIT funds for this purpose until HUD publishes the Federal Register Notice governing the use of the estimated one billion ninety-three million dollars ($1,930,000,000) in funds allocated for enhancements.

---

1 This HUD guidance on CDBG-MIT funds is found at Federal Register Vol. 85 No. 17 (January 27, 2020), 85 FR 4679.
of the power grid. PRDOH is seeking further clarification from HUD on whether this prohibition extends to localized improvements to electrical power systems by addressing household and community scale vulnerability.

Q11. How is the Risk Assessment being developed?

A11: The risk-based mitigation needs assessment is being developed on a rapid timeline to meet HUD’s requirements and includes a review of eighteen (18) potential hazards that encroach on the safety of Puerto Rico and its citizens. This analysis is based on the existing State Hazard Mitigation Plan\(^2\) as a baseline for hazard data and includes updated federal and state data sets to improve Puerto Rico’s understanding of historical and probable hazard risks.

The risk assessment is based on the FEMA definition of risk\(^3\) as shown in the word equation below:

\[
\text{FEMA Risk} = (\text{Vulnerability})(\text{Threat})(\text{Severity of Consequence})
\]

Vulnerability has been determined by developing a geospatial inventory of Community Lifeline infrastructure assets, population of people, and population of socially vulnerable populations.

Q12. Does CDBG-MIT require match funding for projects?

A12. HUD does not require that CDBG-MIT funds be matched by any other funds. However, the Federal Register does require PRDOH to “maximize the impact of available funds by encouraging leverage, private-public partnerships, and coordination with other Federal programs.” Any requirement of match funds will be determined on a program-by-program basis and if so, will be stipulated in the approved CDBG-MIT Action Plan.

Q13. Will Housing be included?

A13. PRDOH is currently evaluating, through stakeholder consultation, the greatest need for mitigation housing activities that reduce the loss of life and property through activities such as buyout, relocation, and elevation, where feasible. CDBG-MIT funds offers Puerto Rico an opportunity to complement homeowner repair options. For

---

\(^2\) The 2016 Puerto Rico State Hazard Mitigation Plan can be found in the COR3 Transparency Portal Document Library accessed at: https://recovery.pr/en/document-library

\(^3\) FEMA Introduction to Hazard Mitigation, Chapter 3. Accessed at: https://training.fema.gov/emiweb/is/is393a/is393a-lesson3.pdf
example, through the Repair, Reconstruction, or Relocation (R3) Program under CDBG-DR with community-based housing mitigation that focuses on vulnerable communities with a need to pair infrastructure hardening, flood mitigation, or other public facility improvements with housing activities in order to reduce the impact of hazards such as flooding, drought, landslide, etc., at the community level.

Q14. Where can I find more information on webinars, slide presentations and transcripts?

A14: Please visit the CDBG-MIT website at https://cdbg-dr.pr.gov/en/cdbg-mit/ where the CDBG-MIT Overview and Timeline presentation is available in both English and Spanish to view and download. This version of the presentation also includes general presenter notes to provide additional details.

All public events will be announced in advance. Public hearing shall take place by public venue⁴, webinar, Facebook live at https://www.facebook.com/cdbgdrpuertorico/, or some combination of forums for reaching the broadest audience possible.

Q15. When can I expect public hearing events to take place and how will I know where to attend?

A15. Due to the COVID-19 health concerns, in early 2020 HUD provided guidance regarding alternative allowable measures related to public hearing requirements. In accordance with that guidance, and in lieu of the ability to conduct in-person events, PRDOH may use mechanisms such as social media platforms and/or radio broadcasts to conduct public hearings. Residents will have the option to submit comments during the public hearing through one or more of the following, including the CDBG-DR website, webinar chat functions, radio call-ins, comments on social media and through the call center (1-833-234-CDBG or 1-833 234-2324, (TTY: 787-522-5950)).

Public hearings will be announced at www.cdbg-dr.pr.gov fifteen (15) calendar days prior to the date of the hearing. The announcement will include the date, time, and location of the hearing. Citizens can also sign up to receive email notifications of public hearings by registering through the CDBG-MIT website at https://cdbg-dr.pr.gov/en/cdbg-mit/. Public hearings will allow citizens, governmental entities, non-profit and community organizations, faith-based organizations, and other interested parties to receive information on CDBG-MIT activities and provide input on CDBG-MIT recovery programs and activities.

⁴ If the social distancing measures taken to control the spread of COVID-19 allow.
Recordings of these events will be made available on the PRDOH website and/or social media within **five to ten (5-10) calendar days** of the event.

**Q16. How can I join the Citizens Advisory Committee?**

A16. Currently, PRDOH has in place a group of citizen and NGO participants known as the “Comité Asesor” that functions as a Citizens Advisory Committee. The mission of the “Comité Asesor” is to collaborate in the orientation, assistance and participation of communities’ individuals to identify real and pressing needs as well as the mechanisms to address them.

The “Comité Asesor” has been set up to exceed CDBG-MIT requirements according to HUD guidance at 85 FR 4676. The aforementioned guide requires a committee to meet in an open forum not less than twice annually in order to provide increased transparency in the implementation of CDBG-MIT funds, to solicit and respond to public comment, input regarding the grantee’s mitigation activities and to serve as an on-going public forum. This Committee must continuously inform the grantee’s CDBG-MIT projects and programs. These meetings will provide the opportunity to solicit and respond to public comments on the mitigation activities.

**Q17. How can I learn more about what activities and practices are eligible?**

A17. As the CDBG-MIT program represents a new funding type for HUD, PRDOH is recruiting volunteer speakers from the public, private, academic, and non-profit sectors with varied backgrounds to promote mitigation knowledge-sharing. This speakers series is called **Mitigation by Scale: Preventing Loss through Mitigation** and is a series of web-based informational videos, presentations, and papers made available to the public through the [CDBG-MIT web page](#). PRDOH is launching this informational series during the preparation of the Puerto Rico CDBG-MIT Action Plan to bring public awareness to mitigation best practices that can be adopted at the municipal, regional, or Island-wide level. This series is expected to kick-off during the month of September 2020 and shall continue into the implementation of CDBG-MIT programs upon HUD’s approval of the CDBG-MIT Action Plan. Information shared through this educational series shall complement the eligible activities published in the Action Plan as part of the programs approved by HUD and detailed in the release of program guidelines.

---

5 These regional events will be conducted if possible, depending on the social distancing measures taken to control the spread of COVID-19.
The three-fold objective of the Mitigation by Scale: Preventing Loss through Mitigation online series is to:

1. Increase awareness of the CDBG-MIT Program among entities and citizens of Puerto Rico;
2. Provide an additional opportunity for participation in the CDBG-MIT planning process and program implementation; and
3. Expand knowledge of mitigating practices among policy leaders and their constituents.

UPDATED 8/10/2020

ADDITIONAL FREQUENTLY ASKED QUESTIONS SUBMITTED TO PRDOH SHALL BE ADDED TO THIS DOCUMENT ON AN ONGOING BASIS.