

## How well does your state follow the HUD Grant Amendment Process?



Published: 6-12-2018 Revised: 6-21-2018

When you follow the HUD Grant money trail you will run into the guidelines HUD places on Grantees which is your state government on just how to handle the Action Plan and the inevitable Amendments that follow in the wake of every declared disaster.

*Comment: Following Louisiana Recovery OCD-DRU managed 2016 Floods using HUD Grant Amendment Process and the State of Louisiana ReLa or Restore.LA.Gov website as our public source. Highlights identify links to Restore.LA.Gov where HUD requires that state to share public information. Grantee = State of Louisiana Office of Community Development - Disaster Recovery Unit Executive Director Patrick Forbes as of 6-12-2018.*

*Creating our custom Iron Triangle so we can understand and follow the State of Louisiana Process and Policy flow.*

>> indicates a comment

### C. Grant Amendment Process

To receive funds allocated by this notice, 2015 and 2016 grantees (listed in Table 1) must submit a substantial Action Plan Amendment to their approved Action Plan and meet the following requirements:

- **Grantee** must consult with affected citizens, stakeholders, local governments and public housing authorities to determine updates to its needs assessment;  
>> No single method of posting information, you have to follow, [Media](#), [Events](#), [News](#) and [Google hack](#) the [Uncategorized](#) folder of the website to find information that concerns the citizens of Louisiana.
- **Grantee** must amend its Action Plan to update its needs assessment, modify or create new activities, or reprogram funds. Each amendment must be highlighted, or otherwise identified within the context

of the entire Action Plan. The beginning of every Action Plan Amendment must include a: (1) Section that identifies exactly what content is being added, deleted, or changed; (2) chart or table that clearly illustrates where funds are coming from and where they are moving to; and (3) a revised budget allocation table that reflects the entirety of all funds;

>> Louisiana Restore (ReLa) [Action Plan page link](#) isn't actually the link to see the various action plans but rather the last public comment request for the latest action plan. To view the Action Plans page you must scroll down on the linked page they provide you and find the disaster you wish to view action plans. For the Floods of 2016 this is the link, [Great Floods of 2016 Action Plans and Amendments](#). When you finally reach the public pages to view your Action Plans and Amendments which are updated in reverse order you might notice the most recent Action Plan is not posted. That's because it hasn't been approved by HUD but it doesn't make it correct for the state to not post the proposed action plan for the public to view and read it. You will find from the Action plan page only the APA 8 public comments request was linked. Here's a link to [download a copy of the APA 8 with Public Comments](#). You will see it on the states website in about 30 days or so.

The ReLa web page shows this: "Flood Recovery Action Plan Available. Find out how to view and comment on the state's flood recovery plans." Which you have to follow the link to the states OCD-DRU Action plans page.

- **Grantee** must publish a substantial amendment to its previously approved Action Plan for Disaster Recovery prominently (see section VI.A.4.a of the November 21, 2016, notice and section VI.A.3.a of the June 17, 2016, notice) on the grantee's official Web site for **no less than 14 calendar days**. The manner of publication must include prominent posting on the grantee's official Web site and must afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the amendment's contents and provide feedback;

>> Follow the link posted in the Restore.LA.Gov website which is for the citizens our official website for the floods of 2016. The substantial amendments are located under the link [Great Floods of 2016](#) on the states DOA website in the sub folder OCDDR. Confusing, yes, but if you know where to look you will find it every time. What you will not find easy is the public notice requesting public comments.

- **Grantee** must respond to public comment and submit its substantial Action Plan Amendment to HUD no later than 90 days after the effective date of this notice;

>> You will not see public comment on the new Action Plan Amendment and you will not see the States Comment to each Public Comment unless you ask the state for the specific document. This is not going to be anything made public by the OCD-DRU until it's approved. The state does not have a process to publish Action Plans Pending HUD approval. HUD rules seem to state that we would need to have this data public. You can download your copy of [APA 8 with Public Comments](#) from this website.

- **HUD** will review the substantial Action Plan Amendment **within 45 days** from date of receipt and determine whether to approve the Amendment per criteria identified in this notice and all applicable prior notices;

>> Blank

- **HUD** will send an Action Plan Amendment approval letter, revised grant conditions (may not be applicable to all grantees), and an amended unsigned grant agreement to the grantee. If the substantial Amendment is not approved, a letter will be sent identifying its deficiencies; the grantee must then re-submit the Amendment within 45 days of the notification letter;

>> Blank

- **Grantee** must ensure that the HUD approved substantial **Action Plan** Amendment (and original Action Plan) is **posted prominently on its official Web Site**;

>> You will not find this information at **Restore.LA.Gov** but rather at [http://www.doa.la.gov/Pages/ocd-dru/Great\\_Floods\\_2016/Flood2016\\_ActionPlans.aspx](http://www.doa.la.gov/Pages/ocd-dru/Great_Floods_2016/Flood2016_ActionPlans.aspx)

- **Grantee** must enter the activities from its published Action Plan Amendment into the Disaster Recovery Grant Reporting (DRGR) system and submit the updated DRGR Action Plan to HUD within the system;  
Grantee must sign and return the grant agreement to HUD;

>> Blank

- **HUD** will sign the grant agreement and revise the grantee's line of credit amount;

>> Blank

- **Grantee** may draw down funds from the line of credit after the Responsible Entity completes applicable environmental review(s) pursuant to 24 CFR part 58, or adopts another Federal agency's environmental review where authorized under provisions incorporated by reference in Public Law 115-31, and, as applicable, receives a response from HUD or the state that approves the grantee's Request for Release of Funds and certification;

>> Blank

- **Grantee** must amend its published Action Plan to include its projection of expenditures and outcomes within 90 days of the Action Plan Amendment approval.

>> This is in the States DOA web pages under the folder of OCDDRU > Or here at the [\*\*Office of Community Development - Disaster Recovery Unit State of Louisiana Action Plan Page\*\*](#).

Resources:

- [Allocations, Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees](#)
- A Notice by the [Housing and Urban Development Department](#) on 08/07/2017
- Other Resources linked in the body of this article.

**Copy provided by TruckAndTools.Com developed by Murray Wennerlund.**

**Email [help@truckandtools.com](mailto:help@truckandtools.com) for additional information.**

**Copyright © 2019 TruckAndTools.Com All Rights Reserved.**

Original location: <https://www.truckandtools.com/disaster/mur.asp?gdyk=71>

Published: 6-12-2018 Revised: 6-21-2018

**Contribute**

TruckAndTools.Com

TRUCK AND  
TOOLS .COM