



SOUTHWEST VIRGINIA

STRATEGIC RECOVERY PLANNING PROGRAM

Community Development Block Grant – Disaster Recovery
(CDBG-DR)



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Version Policy

Version history is tracked in the Version History Table (page 3), 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.

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CDBG-DR PROGRAM GUIDELINES
STRATEGIC RECOVERY PLANNING PROGRAM
VERSION HISTORY

VERSION NUMBER	DATE REVISED	DESCRIPTION OF REVISIONS
1.0	6/4/2026	Original Version

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1 Executive Summary

Strategic Recovery Planning Program

Program Allocation	\$3,720,000
Distribution Model	Subrecipient Delivered
Eligible Entities	Counties, Independent Cities
Maximum Award:	\$155,000

Agency Name: Virginia Department of Housing and Community Development (**DHCD**)

Program: The Strategic Recovery Planning (**SRP**) Program under the Community Development Block Grant – Disaster Recovery (**CDBG-DR**) will address damages in the Most Impacted and Distressed (**MID**) areas of the federally declared disaster: Tropical Storm Helene (FEMA-4831-DR-VA), under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (**Stafford Act**), 42 U.S.C. § 5121.

Announcement Type: Guidelines for the Strategic Recovery Planning Program, funded through the CDBG-DR Program from the United States Department of Housing and Urban Development (**HUD**) allocation under Public Law 118-158.

Program Abstract: Pursuant to the declared disaster, FEMA-4831-DR-VA, and subsequent allocation of CDBG-DR funds under the Stafford Act, DHCD announces these general program guidelines for activities sanctioned by the SRP Program.

The SRP provides planning and capacity-building services to local governments or their designated administrators to assist in meeting mitigation, adaptation, and long-term recovery goals. The program is intended to support the reduction of long-term risk and increase local resilience through community engagement, administrative capacity building, development of planning tools, and implementation of recovery planning efforts.

Participation: The SRP Program is offered as an ‘inclusive-by-default’ endeavor. All twenty-four (24) eligible MID localities are allocated funds without requiring the submission of a competitive application.

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2 Terms and Definitions

Action Plan – The public document required by HUD that details the Commonwealth of Virginia’s storm recovery programs and allocation of CDBG-DR funding.

Area Median Income (AMI) – The median household income for a geographic area, as calculated and published by HUD, and adjusted for household size. AMI is used to establish income limits for determining household eligibility under applicable HUD programs and guidance.

Centralized Application and Management System (CAMS) – The system or platform used by DHCD to track, manage, and/or document program administration and compliance activities, including required closeout submissions such as final audits, as applicable under Program procedures.

Capacity Building – Activities intended to strengthen the ability of a participating locality or its designated administrator to plan for and manage recovery. Capacity building may include process development, staffing support, training, development of planning tools, and improvements to administrative, financial, and compliance practices.

Community Development Block Grant Disaster Recovery (CDBG-DR) – The Community Development Block Grant Disaster Recovery (CDBG-DR) Program is administered by HUD to provide grants to state and local governments for recovery from major declared disasters when other sources of recovery aid are not sufficient to recover. HUD allocates funding to eligible state and local entities to use this assistance in areas impacted by recent disasters to carry out housing, infrastructure, and economic development activities and to mitigate disaster risks and reduce future losses.

Department of Housing and Urban Development (HUD) – The federal department through which the CDBG-DR program funds are administered, monitored, and distributed to participating jurisdictions.

DHCD MID – A DHCD-identified MID area. As described in Virginia’s CDBG-DR Action Plan and consistent with HUD’s FR notice, DHCD may identify additional MID areas beyond HUD-identified MID areas based on unmet needs and other supporting data. Up to twenty percent (20%) of the Commonwealth’s CDBG-DR allocation may be used to address recovery needs in DHCD MID areas, as applicable.

Exempt Activity – An activity that, by its nature, does not have the potential to result in a physical impact on the environment and is therefore exempt from most procedural environmental review requirements. Exempt activities must still be documented in writing and evaluated for compliance with any applicable requirements.

Environmental Review Record (ERR) – The written and/or electronic file maintained by the responsible entity that documents the environmental review process for a project or activity, including the applicable level of review, determinations, consultations, public notices (if required), and all supporting documentation demonstrating compliance with environmental laws and authorities.

Federal Debarment – An action to preclude individuals and entities from receiving federal financial and nonfinancial assistance and benefits under federal programs and activities for a designated period of time.

Federal Emergency Management Agency (FEMA) – An agency of the United States Department of Homeland Security (DHS), with the primary purpose of coordinating the response to a disaster that has occurred in the United States and that overwhelms the resources of local and state authorities.

Federal Register (FR) – The official journal of the U.S. government. It provides legal notice of administrative rules and notices and Presidential documents in a comprehensive, uniform manner. The FR is published every Federal working day and contains Federal agency regulations, proposed rules, public notices, executive orders, proclamations, and other presidential documents.

Grant Agreement – The executed agreement between DHCD and a locality that governs participation in the Program and authorizes reimbursement for eligible activities. The Grant Agreement establishes the scope of work, budget, milestones and deliverables, period of performance, reporting requirements, monitoring provisions, and other terms and conditions applicable to the award.

HUD MID – A HUD-identified Most Impacted and Distressed Area. As required by HUD’s Federal Register notice, Federal Register / Vol. 90, No. 10 (January 16, 2025). DHCD will allocate at least 80 percent of CDBG-DR funds to address recovery needs within these areas.

Implementation Option – The administrative approach selected by an eligible locality to carry out program requirements. The selected implementation option defines which entity is responsible for managing planning activities, completing deliverables, and meeting reporting and compliance requirements.

Low-to-Moderate-Income (LMI) National Objective – Activities that benefit households whose total annual gross income does not exceed 80% of Area Median Income (AMI), adjusted for family size. Income eligibility will be determined and verified in accordance with HUD Guidance. The most current income limits, published annually by HUD, will be used to verify the income eligibility of each household applying for assistance at the time assistance is provided.

Memorandum of Agreement (MOA) – A written agreement between two or more parties that documents specific responsibilities, deliverables, and terms for carrying out an activity or project. An MOA is typically more detailed than an MOU and may establish binding commitments when the document includes enforceable terms, conditions, or funding provisions.

Memorandum of Understanding (MOU) – A written document that describes an understanding between two or more parties regarding coordination, roles, responsibilities, or procedures. An MOU is generally used to document how parties intend to work together. An MOU does not create a financial obligation unless the document explicitly states otherwise.

Mitigation – Measures or actions intended to reduce or eliminate long-term risk to people and property from natural hazards and future disaster events. Mitigation strategies include activities that lessen the severity or consequences of hazard impacts over time.

Planning Activities – Actions undertaken to develop, update, or refine plans, studies, strategies, policies, or tools that guide long-term recovery, resilience, or mitigation decisions. Planning activities may include data gathering and analysis, stakeholder engagement, plan drafting, development of implementation or funding strategies, and related administrative tasks necessary to complete planning deliverables, consistent with CDBG-DR planning authorities.

Planning District Commission (PDC) – A regional political subdivision of the Commonwealth of Virginia established to support local and regional planning activities. PDCs assist member localities with planning, coordination, and implementation efforts, including support for regional approaches for recovery planning and related administrative functions.

Recovery Plan – A plan developed through the Program’s planning process. It identifies recovery needs, establishes goals and priorities, and outlines specific actions or projects. The plan also includes an implementation and funding strategy to guide long-term recovery following Tropical Storm Helene.

Resilience – The ability of a community, system, or infrastructure to anticipate, withstand, adapt to, and recover from hazard events while maintaining or restoring essential functions and reducing future risk.

Subrecipient – A non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program. This entity is responsible for compliance with applicable requirements and the grant agreement. In the case of the SRP Program, subrecipients are localities.

Substantial Amendment – A formal change to the CDBG-DR Action Plan that materially modifies one or more elements of the plan, such as program design, funding allocations, eligible

activities, or applicable policies. Substantial amendments are subject to HUD requirements and public participation procedures described in the Action Plan and governing guidance.

Technical Assistance (TA) – Support provided by DHCD to localities to promote compliance and successful implementation. TA may include training, guidance, templates, problem-solving support, and reviews of deliverables or administrative practices.

Uniform Guidance – The federal administrative requirements, cost principles, and audit requirements for federal awards are set forth at 2 CFR Part 200. Uniform Guidance establishes baseline standards for financial management, procurement, subrecipient oversight, and related compliance obligations applicable to recipients of federal funds.

Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) – A federal law that establishes minimum standards for the fair and equitable treatment of persons displaced as a direct result of federally funded projects. The URA also sets requirements for real property acquisition when federal funds are used. When applicable, URA requirements may include relocation assistance, advisory services, notices, and payment standards.

Units of General Local Government (UGLG) – Any city, county, town, parish, village, or other general purpose political subdivision of a State.¹

Universal Notice (UN) – Published by HUD, this guidance outlines the requirements for CDBG-DR funding after a qualifying presidential disaster declaration. It explains the steps, timelines, and any exceptions that will guide the use of these funds for disaster recovery.

Virginia Public Procurement Act (VPPA) – Virginia’s statutory framework that governs the procurement of goods and services by public bodies within the Commonwealth. The VPPA establishes requirements and standards intended to promote fair competition, transparency, and value in public procurement.

3 Background

3.1 Event

On September 26, 2024, Tropical Storm Helene made landfall on Florida’s northwest Gulf Coast as a Category 4 storm, tracking inland through Georgia, into the western Carolinas, morphing into the slow-moving cyclone of Tropical Storm Helene. On September 27, 2024, Helene unleashed high winds and heavy rain onto Southwest Virginia communities. Deluge-swelled rivers overtopped riverbanks, inundating roads, farmlands, homes and businesses. Floodwaters upended utility infrastructure, and swept wreckage further downstream, across county and state

¹ <https://www.ecfr.gov/current/title-41/part-105-50>

boundaries, into unsuspecting communities, destroying bridges, homes, and depositing vegetative aggregate and personal property across the New River watershed and greater basin.

3.2 Federal and State Response

On October 1, 2024, former President Biden issued a major disaster declaration (FEMA-4831-DR) for the Commonwealth of Virginia under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance (Act 42 U.S.C. 5121).² Under this authority, US Congress passed the Disaster Relief Supplemental Appropriations Act (P.L. 118-158) on December 20, 2024³, allocating \$12,039,000,000 in CDBG-DR funds for disasters occurring in 2023 and 2024.⁴ HUD then published Federal Register⁵ notice 90 FR 4759 on January 16, 2025, allocating \$46,670,000 in CDBG-DR funds to the Commonwealth of Virginia, identifying Washington and Giles counties as MID areas, requiring eighty percent (80%) of funds to benefit these localities. Virginia declared an additional twenty-two (22) counties and independent cities MID, enabling a total of twenty-four (24) localities eligible for recovery funding.

4 Program Approach

The SRP Program, referred to hereafter as the Program, is funded by HUD CDBG-DR. It is intended to support local strategies, capacity building, and the development of implementable planning tools which localities can use to guide long-term recovery and resilience investments.

DHCD recognizes disaster recovery as a shared responsibility involving entire communities. The strength of recovery efforts will determine long-term community well-being, housing, economic, and infrastructure outcomes, as well as preparedness, for years to come. Communities across Southwest Virginia impacted by Tropical Storm Helene will benefit from long-term, coordinated, recovery planning to ensure prospective solutions are aligned with community needs, incorporate existing plans, and produce reliable funding mechanisms.

4.1 Recovery Planning

Effective recovery planning is a critical process that promotes a comprehensive and integrated understanding of community objectives. It updates and connects existing plans to guide post-disaster decisions and investments, creating an accountable organizing framework for comprehensive local recovery efforts, and outlining additional mitigation and preparedness opportunities. Through meaningful engagement with the whole community, the recovery

² <https://www.federalregister.gov/d/2024-28670>.

³ Signed into law by President Biden on December 21, 2024.

⁴ American Relief Act, 2025, Pub. L. 118-158 (2024).

⁵ The Federal Register (FR) is the official journal of the U.S. government. It provides legal notice of administrative rules and notices and Presidential documents in a comprehensive, uniform manner. The FR is published every Federal working day and contains Federal agency regulations, proposed rules and public notices, executive orders, proclamations, and other presidential documents.

planning process considers the needs, resources, and goals of all community members while strengthening recovery coalitions across governmental and non-governmental sectors.

These planning processes result in public documents—visual and narrative aids which benchmark findings and community visions for desired future development. Plans also present specific unmet needs, identify development challenges, propose informed solutions, and produce actionable implementation and funding strategies.

4.2 Planning in Virginia

Virginian communities are well versed in planning practices. This approach to community development was codified in 1968 when the Commonwealth established fundamental provisions for planning commissions and zoning authority in the Regional Cooperation Act, thereby creating PDCs as political subdivisions. In 1980, Virginia began requiring all localities to have a comprehensive community plan and to update those plans every five (5) years. PDCs have since played an important role in assisting localities with meeting state planning requirements and coordinating regional approaches to infrastructure development and shared service needs. Because of this history, local governments are well positioned to maximize the effectiveness of recovery planning funds with support from PDCs.

5 Program Description

The SRP Program is intended to support critical, collaborative, community driven, planning efforts to develop financially sound recovery projects, programs, codes, ordinances, and other strategies to promote a comprehensive and sustainable Tropical Storm Helene recovery.

The Program acknowledges Virginia's deep, local familiarity with comprehensive, specialized, and shared-service planning processes, as well as the institutional stewardship provided by regional Planning District Commissions. To further support this local knowledge and administrative infrastructure, the Program establishes a mechanism to provide critical funds for additional staff, software, hardware, and service providers as deemed necessary, to promote a structured recovery planning process that incorporates a broad coalition of stakeholder input.

Many cities, towns, and counties face recovery challenges unique to local economies, geographies, and housing landscapes. However, as identified in Virginia's CDBG-DR Action Plan,⁶ the unmet needs exceed the financial resources available to Helene-impacted communities. Additionally, communities themselves are presenting different risk profiles as property values get re-assessed, infrastructure ages, populations grow or shrink, and weather patterns shift. These conditions pose challenges for localities navigating a funding landscape

⁶ <https://www.dhcd.virginia.gov/sites/default/files/DocX/cdbg/dr/original-cdbg-dr-action-plan.pdf>

that grows increasingly competitive, requiring diverse, if not collaborative, funding strategies to finance necessary community projects and services.

Under this program, local administrators can conduct thorough analyses of existing conditions and vulnerabilities, review previously developed local and regional plans, and begin to update respective plans as well as incorporate those plans into a holistic and resilient long-term recovery strategy.

The SRP Program seeks to mitigate known funding challenges by equally distributing awards and capacity development resources to each of the DHCD- and HUD-identified MID counties throughout Helene-affected Southwest Virginia. Although eighty (80) percent of CDBG-DR funding is required to be allocated to HUD-identified MIDs, the Commonwealth of Virginia understands that the effects of disasters do not stop at the boundaries of the two (2) counties identified by HUD. Therefore, all (DHCD- and HUD-identified) MIDs will have access to planning funds and tools necessary to develop high-quality recovery plans and diverse funding strategies. Equal access to eligible activities identified within these Guidelines will enable each of the twenty-four (24) affected counties to contribute holistically to envisioning local as well as regional recovery projects and programs, and identify pathways to implement these plans beyond the lifecycle of CDBG-DR.

5.1 Program Method

Local governments representing the DHCD and HUD-identified MID areas will receive funding to conduct an inclusive planning process that incorporates outreach, communication, and discussions with community residents and stakeholders. This process will result in plans identifying resilience and mitigation measures to enhance long-term recovery. These comprehensive plans will strategically position counties and independent cities to identify sustainable and community-centered projects and programs with resilient funding strategies embedded into the deliverables.

5.1.1 Regional Planning

Many issues impacting localities do not stop at the boundary between these entities. This is evidenced by floodwaters that transported one county's debris and deposited further downriver along the banks and islets of another. Some local governments may wish to increase their scope of planning work to prioritize these broader, regional issues and needs,

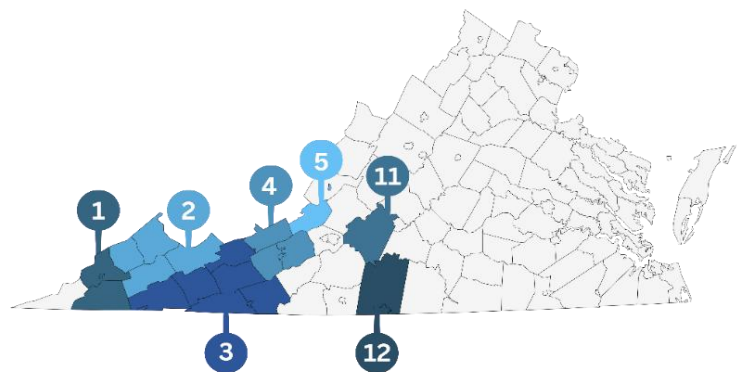


Figure 1 - PDCs of MID localities. Numbers correspond to the PDCs listed in Figure 2.

MID PLANNING DISTRICT COMMISSIONS							
	No. 1 Lenowisco	No. 2 Cumberland	No. 3 Mt. Rogers	No. 4 New River	No. 5 Roanoke	No. 11 Central VA	No. 12 West Piedmont
CITIES	Norton		Bristol Galax	Radford	Covington		Danville
COUNTIES	Scott Wise	Buchanan Dickenson Russel Tazewell	Bland Carroll Grayson Smyth Washington Wythe	Giles Montgomery Pulaski	Craig	Bedford	Pittsylvania

Figure 2 - Breakdown of MIDs in each PDC, illustrating possible regional planning partners.

including but not limited to: watershed planning, shared services, rural communications, early warning systems, energy resilience, transit, etc. Addressing such common denominators to neighboring mountainous, riverine, rural communities, are encouraged through this program and will amplify the impact of individual allocations.

The Program does this by allowing localities to pool administrative and funding resources into regional working groups under the coordination of their respective PDC. In such cases, the recovery plan will prioritize regional recovery strategies over the individual locality, and feature locality-centered strategies as more limited plan components.

Localities interested in this regional approach will coordinate with DHCD to register their intent (see Section 9.1). Please note, a regional approach is only possible if each locality within the PDC prefers to coordinate funding.

5.1.2 Affiliated Programs

The SRP Program may help identify activities for funding through other federal and state recovery programs, including but not limited to: CDBG-DR's Economic Revitalization Program, Housing Recovery Program, and Infrastructure Recovery Program.

5.1.3 Producing Competitive Projects

Recovery Plans developed through the SRP program are designed, in part, to generate project concepts that translate into applications for funding. The planning process can help localities identify priority needs, document disaster impacts and unmet needs, and translate those findings into clearly defined project scopes, preliminary cost considerations, and practical implementation steps.

This level of planning is also intended to strengthen applications submitted under DHCD's current CDBG-DR competitive programs and/or other DHCD-funded programs, in which applicants benefit from having a well-supported project narrative and clear documentation. This

includes the need being addressed, the proposed solution, the population or area served, and how the project advances recovery and resilience goals. Projects grounded in a locally developed recovery plan are typically better positioned to present a complete and competitive application package.

5.1.4 Planning Process

The contents and recommended strategies for recovery included within Recovery Plans are expected to vary by locality; however, the recovery planning process will follow a general framework and result in a standard format and structure.

The planning process shall include, at minimum, the following efforts:

1. Discovery of Baseline Conditions - Before and After Event
 - a. Establish a baseline profile of the community/locality before Helene, including a general history, as well as demographic, housing, economic, and infrastructure conditions.
 - b. Identify how Helene affected different aspects of the community to consider what will need to happen to adapt and prepare for future outcomes.
2. Unmet Needs & Mitigation Assessment
 - a. Conduct a Gap Analysis to identify remaining unmet disaster recovery-related community needs following Helene recovery efforts,
 - b. Identify necessary resilience and mitigation strategies to support the development of future vision, goals, projects and programs.
 - c. Collect risk and vulnerability data and identifies unmet data needs to develop a strategy to produce missing data sets.
3. Review of Existing Plans
 - a. Aggregate existing plans covering land use goals and policies, zoning, and other regulations that can be used as the foundation to local recovery plans.
 - b. Review these plans, policies, and regulations that impact resilience and rebuilding activities to ensure recovery plan alignment.
 - c. Identify any unmet planning needs.
4. Public outreach and engagement
 - a. Develop an engagement strategy to coordinate, prepare, and direct outreach events and activities, including the identification of outstanding community-sourced data necessary to strengthen analysis and assessments of local areas.
 - b. Develop a communication strategy to identify audiences relevant to planning initiatives and the resources and approaches necessary to connect with each.
 - c. Implement both engagement and communication strategies and produce at minimum two (2) in-person public meetings, or more as appropriate, discussing Helene impacts and ideating strategies to a resilient recovery.

- d. Consult with various state, county, and local agencies and governments, non-governmental organizations, and businesses representing local needs and perspectives, especially those of vulnerable populations.
5. Identification of vision and goals
 - a. Develop a collective vision for local recovery that synthesizes and reflects public engagement and assessments of issues related to Tropical Storm Helene.
 - b. Develop goals indicating critical values, principles, methodologies and resilience standards upon which the community vision is manifested.
6. Identification of projects and programs
 - a. Clearly outline and interrelate various policies, programs, projects, and community initiatives to facilitate the vision and goals.
7. Development of Feasibility Studies & Funding Strategies
 - a. Connect projects and programs to capital planning process, identifying funding sources for plan implementation and the order in which these resources will be pursued.
 - b. Tailor feasibility analyses to the identified project type (e.g. housing, infrastructure, or economic development).
 - c. Develop a pro forma for establishing new funding approaches.

5.1.5 Planning Deliverables

The planning process is expected to provide concrete goals along with specific actions or projects that will lead to the recovery and resilience of localities and address critical infrastructure, environmental, and economic needs.

Activities funded by the Program will produce a Recovery Plan document, in electronic and hard copy that identifies strategies for implementing recovery, resilience, and mitigation projects eligible for funding under current and future CDBG-DR allocations, as well as other funding opportunities. Final versions of the Plans will be hosted on the DHCD CDBG-DR website to comply with public transparency requirements.

The following components are expected to be included in the Plan:

1. Results of the unmet needs assessment conducted which clearly describe the remaining disaster-related damage to housing, infrastructure, and economic sectors.
2. Recovery, resilience, and mitigation actions that can be undertaken by localities and stakeholders.
3. Strategy to implement and fund projects and programs identified in the plan.
4. Local risk assessments identifying, analyzing, and prioritizing potential threats (natural, technological, human-made) to the locality's critical assets and infrastructure and economy.

5. Identified project and program partners critical to funding, administration, implementation, monitoring, and future maintenance or project ownership.
6. Monitoring and evaluation framework that establishes implementation indicators, benchmarks, and targets. This creates provisions for tracking the implementation of projects and programs and ensures the plan is updated to reflect any change in conditions.
7. Mitigation and Resilience Toolkit comprised of an implementable policy playbook—with policies to be deployed as needed—that addresses local needs in areas such as:
 - Economic Development
 - Watershed Management
 - Natural Habitat Restoration
 - Recreational Resource Planning
 - Debris Management
 - Resilience and Mitigation Standards
 - County Master Planning
 - Shared Services Planning
 - Neighborhood Development or Redevelopment
 - Historic Districts
 - Hazard Abatement Districts
 - General Improvement Districts
 - Resilient Financial Planning
 - Capital Improvement
 - And other Codes, Ordinances, Standards, and Regulations

6 Funding Information

Funding up to **\$3,720,000.00** is available through the SRP Program and will be divided equally among the **twenty-four (24)** MID localities as described in Section 9 of these Guidelines. This provides each MID area up to **\$155,000** to be reimbursed for planning expenditures, provided grant agreement terms are met.

Additional funds may become available to localities as a result of DHCD's efforts to recapture unused funds, use carryover funds, or because of the availability of additional appropriated funds. All awards are subject to the applicable funding restrictions identified in these Guidelines and subsequent addendum. DHCD reserves the right to reallocate unused funds to other CDBG-DR programs, in accordance with the provisions of the CDBG-DR Action Plan.

6.1 Number of Awards

DHCD estimates that twenty-four (**24**) awards may be issued. To accept an award, units of general local government must select a participation option upon DHCD request. Participation

options are described in further detail in Section 9.1. All twenty-four (**24**) MID localities are strongly encouraged to participate.

6.2 Period of Performance

The initial term of funding agreements between subrecipients (localities) and DHCD will be eighteen (**18**) months for Strategic Recovery Planning activities.

7 National Objective

Funds used for planning activities for the development of community plans are part of the allowable fifteen percent (15%) planning cap for CDBG-DR funds. Per the Universal Notice updated by HUD on March 19, 2025, eligible planning activities will be considered to address national objectives (in compliance with 24 CFR 570.208(d)(4).

8 Eligible Use of Funds

The Program provides funding to localities for the augmentation of staff and equipment as necessary to support management and leadership of the Strategic Recovery Planning processes, as well as to hire planning firms to deliver eligible program activities, as defined by 24 C.F.R. § 570.205. Local administrators will work closely with DHCD, their PDCs and any procured service providers or nonprofits to strengthen internal compliance procedures required to manage long-term recovery activities associated with CDBG-DR grant funds.

8.1 Eligible Costs

Certain activities are considered eligible for reimbursement in accordance with CDBG-DR guidelines and consistent with 24 CFR §570.205, and the Housing and Community Development Act of 1974 Section 105 (a)(14):

1. Costs necessary to develop a recovery plan. These costs must be associated with one of the efforts identified in [Section 5.1.4](#)
 - Staffing and consultancy fees;
 - Software, hardware, and equipment necessary to conduct key activities;
 - Supplies or materials;
 - Advertisements or marketing;
 - Travel costs.
2. Activities necessary for the monitoring, evaluation and oversight of activities and deliverables. These activities could include:
 - Monthly reports, meeting agendas and minutes
 - Invoicing and supporting documentation;
 - Agreements, Memoranda of Understanding (MOUs), Memoranda of Agreement (MOAs)
3. Contracted services necessary to develop a Recovery Plan.

8.2 Ineligible Activities

Certain activities are considered NOT eligible for funding or reimbursement.

- Engineering, architectural and design costs related to a specific project such as detailed engineering specifications and working drawings.
- Construction or any costs of implementation of projects or plans.
- Costs not associated with the development of plans or other planning activities, as described in CFR 24 §570.205.

8.3 Disaster Tie-Back

All CDBG-DR-funded activities must address a direct or indirect impact of Tropical Storm Helene. A direct tie-back refers to a planning activity that addresses a specific, measurable impact caused by Tropical Storm Helene, such as planning to repair or re-design infrastructure that was physically damaged by the storm. An indirect tie-back refers to planning activities that address broader recovery needs that were revealed by Tropical Storm Helene. These might not stem from a single damaged site but instead aim to improve systems affected by the storm, such as planning for affordable housing due to displacement; analyzing economic vulnerabilities; or updating policies to increase future resilience.

9 Program Eligibility

SRP grant recipients must be one (1) of HUD or DHCD-identified MID localities.

9.1 Eligible Participants

SRP grant recipients must be Units of General Local Government (UGLG) serving HUD or DHCD-identified MID Areas, as identified in Virginia’s CDBG-DR Action Plan and Section 8.1.1 of these Guidelines.

Eligible Entities may include counties and independent cities, subject to eligibility criteria.

9.1.1 Eligibility Criteria: MID Areas

For the 2024 allocation, HUD identified the counties of **Washington** and **Giles** as MID areas. The Commonwealth also identified the following counties and cities as MID localities:

DHCD-Identified Most Impacted and Distressed (MID) Areas

Counties		Cities
• Bedford	• Pittsylvania	• Bristol
• Bland	• Pulaski	• Covington
• Buchanan	• Russell	• Danville
• Carroll	• Scott	• Galax
• Craig	• Smyth	• Norton

- Dickenson
- Grayson
- Montgomery
- Tazewell
- Wise
- Wythe
- Radford

HUD requires 80% of the overall CDBG-DR allocation to benefit HUD-identified MID Areas. This SRP Program allocates 8.33% of CDBG-DR funding to HUD-identified MID areas, with the understanding that the minimum allocation of 80% will be met across the entirety of the CDBG-DR portfolio of programs.

10 Program Participation

All twenty-four (24) MID counties and cities, as identified by DHCD and HUD, are defaulted into program enrollment without the need to compile a traditional competitive application. Instead, MID localities will be notified of their automatic program enrollment with a request to select an implementation option. Following the selection of preferred program implementation option, the locality will enter into a Grant Agreement with DHCD.

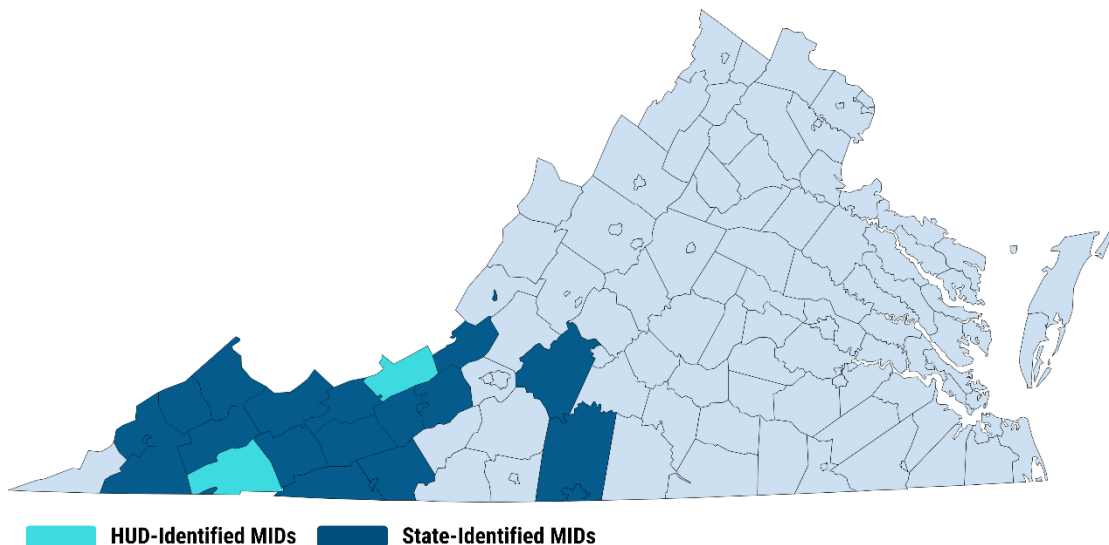


Figure 3 - Map indicating HUD- and DHCD-MID localities

10.1 Implementation Options

Each locality will have the opportunity to choose one of the following options within ninety (90) days of receiving notification of the SRP funding opportunity:

Option A — Local Administration

Localities choosing Option A will be responsible for managing the implementation of local planning activities. They will do so by hiring additional staff as necessary, and purchasing necessary tools and equipment. All administrative responsibilities become the responsibility of the locality.

Option B — Consultant Administration

Localities selecting Option B, in effect, register an intent to subcontract the administration and implementation of program activities to a consultant of their choosing. This entity may be independently procured, or the locality may choose to request their PDC to serve as its 'consultant.'

Option C — Regional Administration

Localities selecting Option C will opt to pool their allocated \$155,000 with those of neighboring MID localities to produce a regional plan, with planning services provided by their local PDC.

Option D — Decline to Participate

Localities selecting this option choose to reject their allocation of \$155,000 in developing a recovery plan. Localities selecting this option must provide DHCD with official written notice of declination to participate by the deadline specified above.

10.2 Outlying Participation Scenarios

The Program is developed to eliminate barriers to CDBG-DR participation, ensuring greater access to recovery resources. It does this by providing a non-competitive entry point, in-person technical assistance to eligible participants, funding to augment local staff or hire vendors, and a framework to leverage local capacities. Participation is not mandatory, and with the possibility of a locality choosing Option D, the Program anticipates there may be towns interested in accessing planning funds, but located within jurisdictions declining to participate. In such scenarios, the Program is willing to work with towns within eligible, but opting-out, MID to conduct critical recovery planning activities. Town leadership should contact DHCD for further information after localities have indicated preferences.

10.3 Pre-Contract Required Submission

To accept SRP funding, participating localities should provide a formal response on locality letterhead signed by the County Administrator. This letter must be delivered to cdbg-dr@dhcd.virginia.gov within 90 days of receiving notice of available funds from DHCD, and should include the following attachments:

- Preliminary budget for SRP activities;
- The amount and source of all other funding received for disaster recovery planning efforts;
- Proposed timeline; and

- Project Management Plan (PMP), including the primary point of contact for the SRP grant.

To ensure compliance with federal funding requirements, participating localities may be required to provide certain information on local operations and capacity to DHCD via CAMS. This information may include, but is not limited to:

- Narrative responses describing known local unmet needs and active planning efforts;
- Attached documentation such as:
 - Financial management policies and procedures.
 - Any existing plans relevant to the anticipated planning activity, such as:
 - Mitigation
 - Resilience
 - Debris Removal
 - Disaster Recovery
 - Infrastructure
 - Housing
 - Land Use / Zoning
 - Economic Development
 - Community Development
 - Transportation
 - Watershed Plans
 - Environmental Plans
 - Any available relevant georeferenced data (GIS) data, such as zoning layers (classification & qualification)

Once initial documents and information are provided, DHCD will conduct Facilitated Planning Sessions with localities to establish program expectations and requirements. Upon completion, participants shall enter into a Grant Agreement with DHCD, certifying that compliance with CDBG-DR requirements will be met in order to access allocated funding and implement recovery planning processes.

10.4 Grant Agreement

An executed grant agreement will be provided to the locality before they may begin reimbursable activities. At a minimum, the agreement will include:

- Scope of work,
- Deliverable timeline,
- Terms of reimbursement including detailed description of activity completion requirements,
- Plan budget,
- Record and reporting requirements, and
- Recapture of funds guidance

Prior to the execution of the grant agreement, localities will have a period to review the terms and conditions for their project. The grant agreement requires the localities to certify that they understand and agree to all the terms. DHCD reserves the right to amend grant agreements to ensure project completion and funds are being utilized compliantly.

10.5 Locality Onboarding

DHCD will conduct Facilitated Planning Sessions to support localities at the key stages of the onboarding process. Depending upon the identified needs or issues, DHCD may choose to hold these sessions for the entire group of participating localities, individually, or some combination.

10.6 Recovery Planning Timeline

The following identifies a general timeline and description of the recovery planning process. Please note that “Month 1” will commence following the execution of a grant agreement between DHCD and the locality. More details will be provided during the Facilitated Planning Sessions.

Recovery Plan Timeline										
Planning Process		Mo. 1	Mo. 2	Mo. 3	Mo. 4	Mo. 5	Mo. 6	Mo. 7	Mo. 8	Mo. 9
Phase 1	Analysis of Existing Conditions	■								
Phase 2	Gap Analysis & Data Collection (Unmet Needs Assessment)		■	■	■					
Phase 3	Public Engagement		■	■		■	■			
Phase 4	Interim Vision, Goals, Objectives, and Activities			■	■	■				
Phase 5	Final Vision, Goals, Objectives, and Activities					■	■	■		
Phase 6	Implementation & Funding Strategy						■	■	■	■

Figure 4 - Recovery Planning Activity Timeline

Phase 1 — Analysis of Existing Conditions - This phase will establish how the disaster impacted local conditions. Using the best available data, participants will create a baseline profile and provide key insights into the conditions on the ground for the community before the disaster, as well how Helene impacted those conditions.

Phase 2 — Gap Analysis & Data Collection (Unmet Needs Assessment) - A gap analysis is a process in which a locality compares current conditions to its current and future needs. Localities will be expected to conduct and deliver an unmet needs assessment to evaluate housing, infrastructure, and economic development conditions at the local level.

Phase 3 — Public Engagement - Participation from a broad representation of the public, especially those vulnerable and hard-to-reach populations, is a critical component to a strong planning process. Accessible planning efforts are integral to the identification of activities that address remaining localized unmet needs. Localities will ensure that community engagement and outreach efforts occur, including consultation and collaboration with local nonprofits, advocacy groups and other impacted stakeholders, especially those that cater to vulnerable (e.g. LMI) populations. Strategic Recovery Planning should include a variety of methods to inform 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.

Phase 4 — Interim Vision, Goals, Objectives, and Activities – Having conducted required qualitative and quantitative research, localities will identify goals, objectives, and activities that are necessary for recovery. The identified goals, objectives and activities should include projects as well as policy and programmatic activities that will achieve the goals produced during the outreach phase. This interim vision will be presented back to the community in a final round of outreach.

Phase 5 — Final Vision, Goals, Objectives, and Activities – Once public input has been received on Phase 4, any goals, objectives, and activities may be finalized within a recovery plan.

Phase 6 — Implementation & Funding Strategy – With any good plan, there must be a strategy to implement, including a method to fund the activities identified within the plan. This phase will ensure that recommended recovery activities are tied to key funds and administrative functions to ensure the plan is implemented.

11 Roles and Responsibilities

11.1 Department of Housing and Community Development

Virginia's DHCD is responsible for overall administration, compliance and oversight of the SRP Program and acceptance of planning products submitted by eligible entities. Additionally, DHCD is responsible for providing technical assistance and administering risk assessments for all participating localities. By accepting final Plans, DHCD does not determine final eligibility of activities identified within the plans for other DHCD programs. Activities will be reviewed upon application submittal to DHCD 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 grant agreement.

11.2 Counties and Independent Cities

Both the DHCD and HUD-identified MID Counties and Independent Cities—recipients of direct allocations of CDBG-DR funds—are responsible for creating Recovery Plans in a timely manner. Plans must meet all Program requirements and identify eligible projects or programs, and resilient funding pathways.

Any locality not intending to enter into an administrative agreement with their respective PDC will be required to procure any consultants or contractors in accordance with the Virginia Public Procurement Act (VPPA) or provide evidence of sufficient local capacity to conduct the required activities.

11.3 Virginia Planning District Commissions

MID localities are expected to work with their PDCs to streamline program administration, thereby encompassing all local needs and planned recovery activities. Consolidation of the administration and implementation of the SRP under PDCs creates economies of scale, ensuring that planning occurs in a collaborative nature crossing jurisdictional boundaries, and focuses on the populations most in need of limited recovery funds.

12 Monitoring and Compliance

12.1 Program Monitoring

Localities must carry out planning efforts that meet the monitoring requirements for project administrators and contractors. The monitoring and compliance review process informs reporting to DHCD and HUD. Components of this process include:

- Quarterly progress reports.
- Review of budgets, project contracts, and local staff timesheets.
- Review of remittances for eligibility of expenses.
- Review of deliverables to ensure alignment with program requirements.
- Review of activities to ensure compliance with CDBG-DR program and federal requirements.

A monitoring report may indicate one or more of the following:

- Locality performance complied with the requirements of the Program;
- Certain findings require corrective actions by the locality;
- Concerns about the performance of the projects or activities;
- Observations about efficiencies or items of note; or
- Technical assistance is necessary.

12.2 Procurement

The Uniform Guidance procurement requirements (2 C.F.R. part 200, Subpart D) are applicable to CDBG-DR funded projects. These policies and procedures ensure that Federal dollars are spent fairly and encourage open competition at the best level of service and price. All parties involved in the procurement process must adhere to these requirements.

Standards for procurement of supplies, equipment, construction, engineering, architectural, consulting, and other professional services are outlined in [VPPA](#). DHCD and its subrecipients must follow these standards to ensure goods and services are procured efficiently, at a fair price, and in compliance with all applicable Federal and Commonwealth laws and executive orders.

12.3 Minority and Women Owned Business Enterprises (M/WBE)

Any subcontracted activities funded by the SRP Program must be procured in accordance with the minimum HUD standards regarding each participating jurisdiction's outreach effort to minority business enterprises (MBE) and women-owned business enterprises (WBE); (together M/WBE) within 24 C.F.R. § 85.36(e) and 2 C.F.R. § 200.321.

Compliance is ensured by requiring, as applicable, subrecipients, program partners and contractors to make best efforts to achieve an overall M/WBE participation goal of twenty percent (20%) of the entire contract value consisting of ten percent (10%) percent for MBE and ten percent (10%) for WBE.

If, after making good faith efforts, a subrecipient is unable to meet M/WBE goals, subrecipients may submit a request for a M/WBE Waiver for their overall goal. The request must set forth the reasons for the inability to meet any or all of the participation requirements together with an explanation of the good faith efforts undertaken.

12.4 Section 3

While it is not anticipated that any planning projects will trigger Section 3 requirements outlined in 24 CFR 75.3(a)(2), some plans may be tied to construction or rehabilitation activities that exceed \$300,000. If so, Section 3 requirements will be triggered, and the implementing department will be required to coordinate with DHCD regarding all documentation or regulatory requirements.

For more information regarding Section 3 processes, please refer to the [CDBG-DR Implementation Manual](#).

12.5 Environmental Review

All activities assisted with CDBG-DR funds are subject to the environmental review requirements at 24 CFR Part 58. The Responsible Entity (RE) must determine the appropriate level of review for Program activities prior to the obligation or expenditure of any CDBG-DR funds. SRP Program activities are limited to planning and capacity-building. It is anticipated that these activities will qualify as Exempt or Categorically Excluded Not Subject to (CENST) under 24 CFR Part 58. Even when activities are Exempt or CENST, the classification must be documented. DHCD will work with each participating locality to complete the required environmental review documentation for the planning award, including completing an Exempt/CENST determination form and retaining supporting documentation in the project file. Program funds may not be drawn up or expended until the required environmental review documentation is complete, as applicable.

Any construction projects identified in the Recovery Plan that are subsequently funded with federal resources will be subject to environmental review requirements.

12.5.1 Exempt Activities

Exempt activities are those that, by their nature, do not have the potential to cause physical impacts on the environment. Exempt activities are not subject to most procedural requirements of environmental review. DHCD will document the Exempt determination in writing prior to the obligation or expenditure of CDBG-DR funds.

12.6 Displacement, Acquisition, Relocation, and Replacement of Housing

Planning activities will not result in any displacement, acquisition, relocation, or replacement of housing needs. Therefore, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and section 104(d) of the Housing and Community Development Act of 1974 (HCDA) are not applicable when conducting planning activities and are not relevant under this Program.

12.7 Duplication of Benefits (DOB)

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 assistance for any part of a loss for which assistance has already been received from another source, including other Federal programs, private insurance, charitable assistance, or other third-party funding. Duplication of benefits requirements apply to CDBG-DR assistance and are intended to ensure that Program funds are used only to address unmet needs.

The SRP Program funds planning and capacity-building activities and does not provide assistance for construction, rehabilitation, reconstruction, or other property-level improvements. As a result, duplication of benefits is not typically evaluated at the individual property level under this Program. Participating localities must disclose any disaster recovery planning funds or closely related recovery planning resources received from other sources that support the same or substantially similar planning activities.

As part of pre-award or pre-contract submission requirements, localities shall identify and describe any other funding sources that support recovery planning activities associated with Tropical Storm Helene, including the funding sources, period of performance, scope of work, and intended use. If overlapping resources are identified, DHCD will review the information and work with the locality on a case-by-case basis to ensure that SRP-funded activities are not duplicative. This may include refining the scope of work, adjusting budgets, or otherwise documenting how SRP funds will be used to support distinct eligible planning activities.

Where verification is necessary, DHCD may confirm reported assistance using available federal, state, or local information sources. Documentation sufficient to demonstrate non-duplication must be maintained in the subrecipient file. DHCD will apply duplication of benefits requirements consistent with the Stafford Act and HUD's CDBG-DR duplication of benefits

guidance, including the 2019 DOB Notice (84 FR 28836), as applicable to Virginia's award and reflected in the Action Plan and any HUD-approved substantial amendments.

12.8 Timely Expenditure of Funds

All awards within the Program are subject to the requirements set forth by HUD, including the expenditure of 100% of the CDBG-DR allocation within six (6) years of DHCD receiving a signed grant agreement from HUD (April 30, 2031). As part of the Grant Agreement process between DHCD and localities, all award recipients will be required to submit an expenditure projection. Additionally, award recipients will be required to coordinate with DHCD regarding any subsequent changes, updates, or revisions to planning budgets.

12.9 Records Retention

The following records will be maintained for this program:

Localities must maintain complete and accurate records sufficient to document compliance with Program requirements and applicable federal and state regulations. Records must be retained for five years following grant closeout and made available in accordance with the records retention requirements and procedures specified in the executed Grant Agreement. Records must be made available for inspection upon request by DHCD, HUD, the Office of Inspector General, and other authorized representatives. Localities must also provide reasonable public access to records regarding the use of CDBG-DR funds, consistent with applicable state and local requirements and the protection of confidential or sensitive information.

12.10 Anti-Fraud, Waste, and Abuse

Pursuant to HUD's Universal Notice (90 FR 1754), DHCD maintains comprehensive policies and procedures to prevent, detect, and report fraud, waste, abuse, or mismanagement in all CDBG-DR funded programs. It encourages any individual who is aware or suspects any kind of conduct or activity that may be considered an act of fraud, waste, abuse, or mismanagement, to report such acts to DHCD, the Office of Inspector General (OIG) at HUD, or any local or federal law enforcement agency.

Complaints regarding the Commonwealth's CDBG-DR program may be filed with the [Office of the State Inspector General \(OSIG\)](#).

13 Program Closeout

Upon completion of all planning activities, the SRP Program closeout processes shall commence. This process will include ensuring that all work performed has been accepted by DHCD, all milestones met, all deliverables completed, and Program activities performed in compliance with Program requirements. Evaluation of the work shall be performed at specific milestones, upon submission of each deliverable, and during the final inspection of work performed. DHCD will

perform a complete review of subrecipient files to ensure all necessary documentation is present and that the grant is ready for closeout.

General requirements for closeout are as follows:

- All milestones have been met and deliverables submitted, and each in accordance with all requirements of this Program.
- All eligibility and duplication of benefits documentation are found to be in accordance with all requirements of this Program.
- All Program forms required throughout the entirety of the Program process have been duly completed and executed by the appropriate parties.
- All funds used for the Program, whether CDBG-DR or received using a subrogation of funds, have been properly accounted for and reconciled with payments made to the Locality and other sub-recipients or service providers.
- All payments have been issued to service providers or program partners, including applicable retainers.
- A final audit has been submitted in CAMS.
- All other requirements met for closeout as established in the executed grant agreement.

Outreach will be made to localities, or any other party involved, if any additional information is necessary to close out the project. Once all levels of quality control review are passed, localities will receive a Final Notice, and their files will be converted to a "Project Complete" status.

14 General Provisions

14.1 Program Guidelines Scope

This document sets forth the policy governing the Program. These program guidelines are intended to provide program activity guidance in Program implementation. All Program activities must comply with Program policies. In addition, all staff must adhere to established Program procedures and all federal and state laws and regulations, as applicable, in the execution of program activities.

14.2 Program Guidelines Amendments

DHCD reserves the right to modify the policies established in these guidelines. If an amended version of these guidelines is approved, the amended version fully supersedes all other previous versions and should be used as the basis for the evaluation of all situations encountered in the implementation and/or continuance of the Program from the date of its issuance. Each version of the program guidelines contains a detailed version control log that outlines any substantive amendment, inclusions and/or changes.

14.3 Extension of Deadlines

The Program may extend deadlines on a case-by-case basis. DHCD reserves the right to decline to extend a deadline based on a review of the individual project circumstances.

14.4 Written Notifications

All determinations made by the Program will be provided to localities in writing by mail or e-mail. If a participant believes that any determination was made without being written, the entity may request that such decision be made in writing and duly substantiated.

14.5 Conflict of Interest

An organizational conflict of interest occurs because of activities or relationships with other persons including a person who is unable or potentially unable to render impartial assistance, or advise the Government, or the person's objectivity in performing the contract work is or might be otherwise impaired, or a person has an unfair competitive advantage.

Conflicts of interest in the award and/or administration of contracts must be avoided. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract." (2 CFR 200.318 (c) (1)23)

Other federal regulations with which the subrecipient must comply are the conflict-of-interest requirements in 24 CFR 570.61124.

14.6 Citizen Participation

Throughout the duration of the grant, all citizen comments on DHCD's published Action Plan, any substantial amendments to the Action Plan, performance reports and/or other issues related to the general administration of CDBG-DR funds, including all programs funded by this grant, are welcomed. The Citizen Participation Plan is documented within the Commonwealth's CDBG-DR Action Plan at: <https://www.dhcd.virginia.gov/cdbg-dr>.

14.7 Citizen Complaints

As part of addressing Virginia's long-term recovery needs, citizen complaints on any issues related to the general administration of CDBG-DR funds may be submitted in writing throughout the duration of the grant. See 24 C.F.R. § 570.486(a)(7). Complaints pertaining to the CDBG-DR program can be submitted to cdbg-dr@dhcd.virginia.gov. Should the Commonwealth receive complaints from constituents related to this funding, DHCD will aim to provide a substantive written response within 15 working days of receipt. Any complaints requiring further remediation will be handled by DHCD on a case-by-case basis. See 24 C.F.R. § 570.486(a)(7).

14.8 Cross-Cutting Guidelines

Some federal and local requirements apply to all programs funded by CDBG-DR. These Cross-Cutting Guidelines cover topics such as financial management; environmental review; labor standards; acquisition; relocation; fair housing; among others. The requirements described in the Cross-Cutting Guidelines apply to all programs described in DHCD's CDBG-DR Action Plan and its amendments. For more information, please refer to the [CDBG-DR Implementation Manual](#).

15 Program Oversight

Nothing contained within these guidelines is intended to limit the role of DHCD, HUD, and/or corresponding authorities from exercising oversight and monitoring activities of the Program.

END OF GUIDELINES