



OFFICE *of*  
**INSPECTOR GENERAL**



UNITED STATES DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT

# CPD Could Improve the Timing of the Delivery of Disaster Recovery Funding

Audit Report Number: 2024-FW-0002

December 15, 2023

Date: December 15, 2023

To: Tennille S. Parker  
Director, Office of Disaster Recovery, DGR

//signed//  
From: Kilah S. White  
Assistant Inspector General for Audit, Office of Inspector General, GA

Subject: CPD Could Improve the Timing of Delivery of Disaster Recovery Funding

Attached is the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our audit of HUD's Community Development Block Grant Disaster Recovery program timing.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, as amended, requires that OIG post its reports on the OIG website. Accordingly, this report will be posted at <https://www.hudoig.gov>.

If you have any questions or comments about this report, please do not hesitate to call Danita Y. Wade, Audit Director, Disaster Recovery Audit Division, at (817) 978-9309.

## Highlights

### CPD Could Improve the Timing of Delivery of Disaster Recovery Funding | 2024-FW-0002

#### What We Audited and Why

From 2001 to 2022, the Community Development Block Grant - Disaster Recovery program provided almost \$98 billion to states, cities, counties, and territories to help them recover from disasters. Administering disaster recovery has been a recurring U.S. Department of Housing and Urban Development (HUD) top management challenge since 2018, and the challenge stressed that HUD must ensure that disaster recovery funds reach communities in a timely manner. Therefore, we audited the disaster recovery program to determine whether the Office of Community Planning and Development (CPD) had improved the timing of its delivery of disaster recovery funds and whether it met congressional allocation timing requirements.

#### What We Found

CPD's time to deliver disaster program funds to grant recipients varied between 2001 and 2022 and trended upward. For 2018 and 2019 disaster relief funding, CPD took significantly longer to allocate and award the funds. Further, CPD did not meet the publishing requirements mandated in one public law and did not meet the allocation requirements for another, which required funds to be allocated within a specific mandated timeframe. CPD's increase in time to deliver disaster program funds and its inability to meet a few of the statutory requirements were caused by (1) the disaster recovery program's lacking permanent authorizing legislation; (2) required coordination among multiple Federal agencies, various HUD offices, and the grantees; and (3) other external and internal issues. As a result, grantees had to wait longer to execute their grant agreements and start spending the disaster recovery funds. Further, CPD lacked consistent and documented allocation data for all grantees, which impaired its ability to benchmark and consistently report the date of allocation to Congress or the public.

#### What We Recommend

In 2020, CPD issued a Federal Register (FR) notice with an appendix titled "The Consolidated Notice," and CPD included this appendix in subsequent notices, which decreased the time it took CPD to allocate disaster program funds. However, opportunities exist to further improve the timing of CPD's delivery of disaster program funds. We recommend that the Director of the Office Disaster Recovery (1) collect and record the number of days that it or other entities take to complete each milestone in the grant process, (2) establish timing benchmarks for the milestones at each significant step in the allocation and award process based on actual data accumulated for the various grants, and (3) take steps to ensure that the milestone point of allocation is formally defined and documented, to allow for accurate tracking of compliance with requirements. We believe that implementation of the recommendations in this report will improve overall timing of program delivery and ensure that funds are provided to grantees as quickly as possible.

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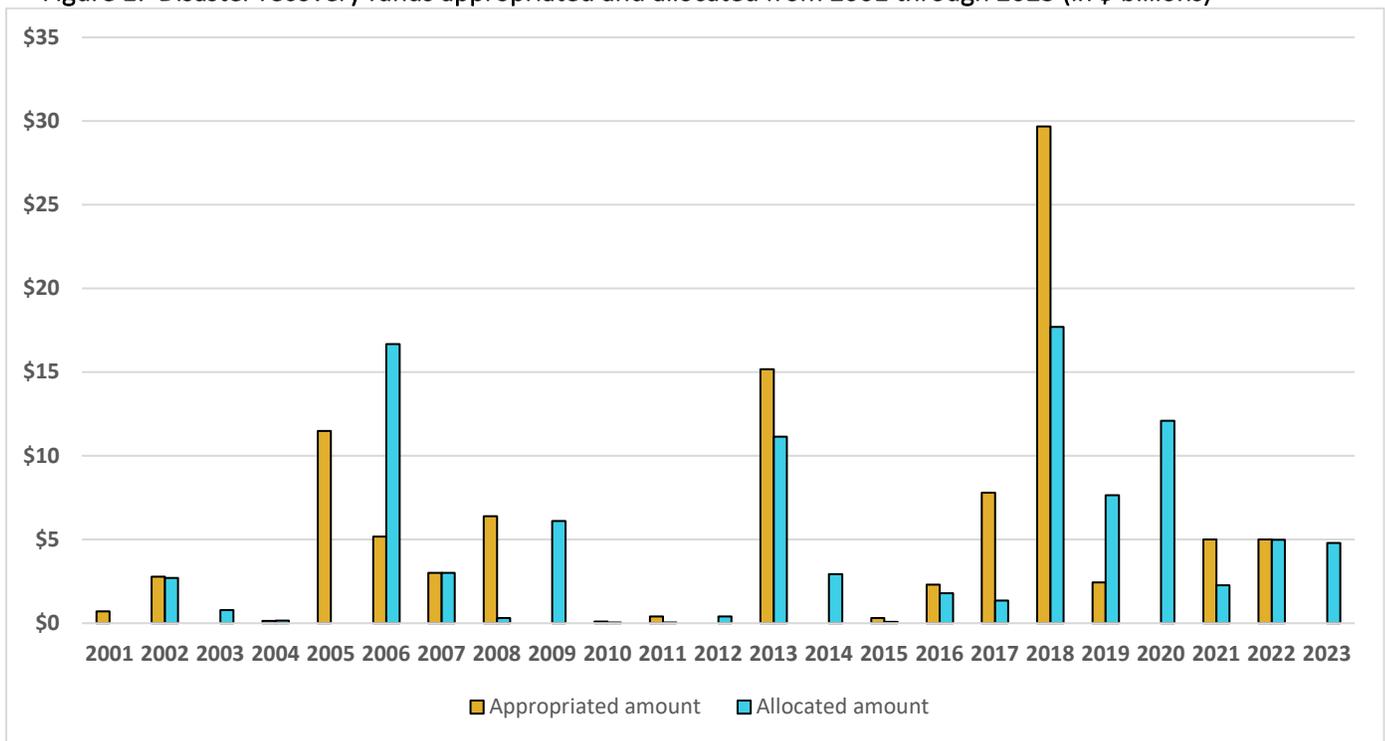
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## Background and Objective

Congress authorizes Community Development Block Grant - Disaster Recovery (CDBG-DR) funding under Title I of the Housing and Community Development Act of 1974 by enacting public laws that appropriate supplemental funds to pay for disaster recovery. These laws direct the supplemental funds to the U.S. Department of Housing and Urban Development’s Office of Community Planning and Development (CPD). CPD is responsible for making the disaster recovery funds available to grantees in impacted areas, so that they can pay for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization.

HUD has been providing disaster recovery assistance to grantee communities affected by disasters for more than 30 years.<sup>1</sup> Assistance to grantees has ranged from \$589,651 to more than \$8.2 billion.<sup>2</sup> As shown in figure 1, from 2001 through 2023, Congress appropriated and allocated almost \$98 billion to grantees.<sup>3</sup> As of July 5, 2023, CPD had not allocated more than \$142 million and had not awarded more than \$5.6 billion authorized by Congress for disaster relief.

**Figure 1: Disaster recovery funds appropriated and allocated from 2001 through 2023 (in \$ billions)**

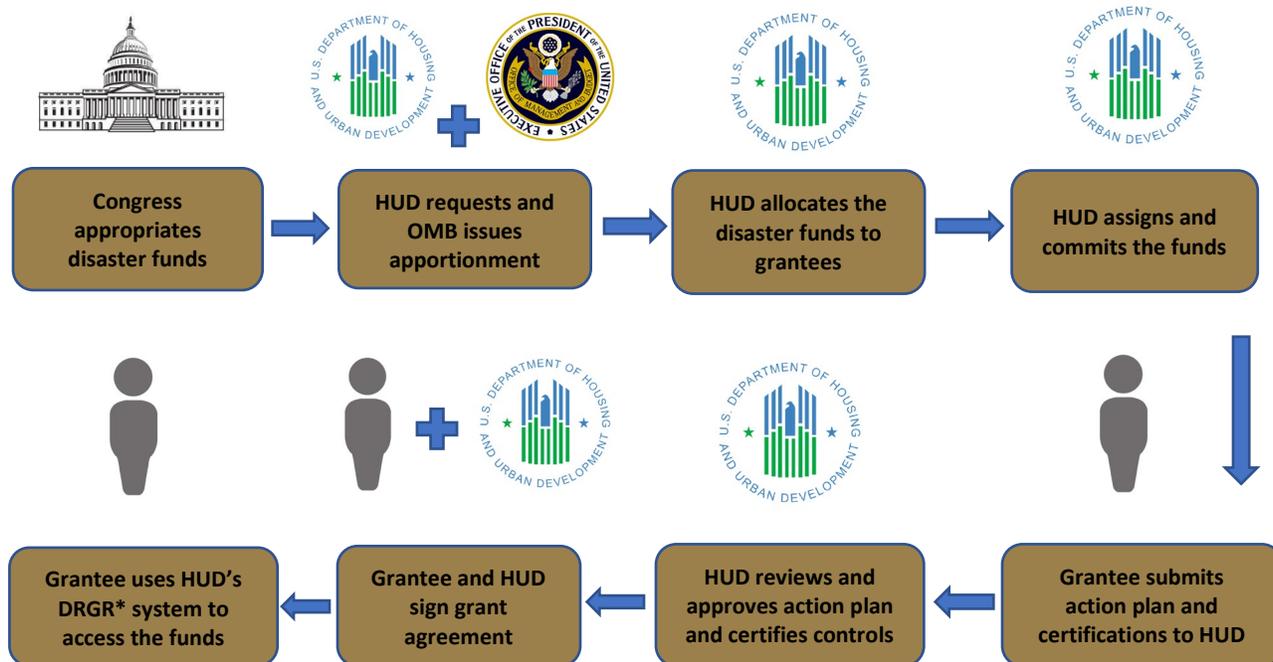


Source: Office of Inspector General (OIG) analysis of appropriated and allocated amounts

<sup>1</sup> Congress provided the first supplemental funds for Hurricane Andrew, which impacted Florida in August 1992.  
<sup>2</sup> See appendix B for a listing of grantees and amounts.  
<sup>3</sup> See appendix C for the amounts Congress appropriated and appendix D for the amounts HUD has allocated.

The overall process to fund disaster recovery program grants involves Congress, the Office of Management and Budget (OMB), HUD, and the grantee agencies, as shown in figure 2.

Figure 2: Disaster recovery funding process



Source: OIG analysis of grant process  
 \*DRGR = Disaster Recovery Grant Reporting system

Multiple HUD offices are involved in the complex allocation and awarding of disaster recovery funds, including the Office of Policy Development and Research (PD&R), various offices and divisions in CPD, the Office of Public Affairs (OPA), the Office of Congressional Intergovernmental Relations (CIR), the Office of General Counsel (OGC), and the Office of the Secretary. Further, HUD must obtain and use data from the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) to make its determinations of unmet needs as part of its disaster recovery funds allocation process.

Generally, HUD completes the following milestones to allocate and award disaster recovery grants.

To allocate the funds:

- PD&R obtains data<sup>4</sup> from FEMA, SBA, and others to calculate estimated unmet housing needs.
- PD&R, CPD, and OGC generate a proposed allocation based on PD&R's calculations.
- PD&R prepares a memorandum for the HUD Secretary recommending allocation amounts.
- The Secretary reviews and approves the allocation.
- CIR informs Congress of the allocation.
- OPA announces the allocation to the public using a press release.

<sup>4</sup> The data includes, but is not limited to, damage data from FEMA's Individual Assistance Program and from SBA's Disaster Loan Program.

To publish the rules and requirements in the *Federal Register*:

- CPD’s Office of Disaster Recovery (ODR)<sup>5</sup> and budget office work together to assign and commit the funds.
- CPD drafts a Federal Register (FR) notice, which contains allocations, waivers, and additional requirements, and sends it through HUD’s clearance process.
- CPD completes the FR notice, which is signed by the Assistant Secretary for Community Planning and Development and sends it to OGC, who submits the notice to the *Federal Register* to be published.

In February 2022, CPD issued an FR notice related to the Supplemental Appropriations Act, 2022, which contained a new appendix called “The Consolidated Notice,” which applied only to disasters which occurred in 2020.<sup>6</sup> CPD stated it created the Consolidated Notice to speed allocation of funds to grantees. Since CPD published the initial Consolidated Notice, it has issued three additional allocation FR notices. Each of these FR notices contained the Consolidated Notice with alternative requirements and waivers for disasters that occurred from 2020-2022.<sup>7</sup> However, the FR notices can include alternative waivers and requirements that make changes to the language in the Consolidated Notice. Although CPD’s use of the Consolidated Notice has slightly decreased the amount of time CPD takes to issue allocations, as of July 5, 2023, sufficient data did not exist to show whether it will improve overall disaster recovery program timing.

Our objective was to determine whether CPD had improved the timing of its delivery of disaster recovery program funds from 2001 to 2022 and whether it had met congressional timing requirements.

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<sup>5</sup> In January 2023, HUD’s Disaster Recovery and Special Issues Division (DRSI) transitioned into the Office of Disaster Recovery (ODR).

<sup>6</sup> 87 FR 6364, appendix B, issued February 3, 2022.

<sup>7</sup> 87 FR 31636, appendix B, issued May 24, 2022, 88 FR 3198, appendix B, issued January 18, 2023, and 88 FR 32046, appendix B, issued May 18, 2023.

# Results of Audit

## CPD Could Improve the Timing of Delivery of Disaster Recovery Funding

We reviewed the time it took CPD to allocate and award disaster recovery funds that Congress appropriated from 2001 to 2022. We found that CPD’s delivery of disaster program funds to grant recipients varied between 2001 and 2022 and trended upward. For 2018 and 2019 disaster relief funding,<sup>8</sup> CPD took significantly longer to allocate and award the funds. Further, CPD did not meet two congressional timing requirements for allocating disaster recovery funds to grantees. These issues were primarily due to (1) the disaster recovery program’s lacking permanent authorizing legislation; (2) required coordination among multiple Federal agencies, various HUD offices, and the grantees; and (3) other external and internal issues. All issues resulted in delays throughout the grant allocation and award process. As a result, grantees had to wait longer to execute their grant agreements and start spending the disaster recovery funds on activities aimed at assisting communities recovering from disasters. Additionally, CPD lacked consistent and documented allocation data for all grantees. The lack of allocation and award data impaired CPD’s ability to perform benchmarking<sup>9</sup> of its grants against established milestones<sup>10</sup> to identify timing issues. Further, it prevented CPD from consistently reporting the date of allocation to Congress or the public. We believe that implementation of this report’s recommendations will improve the overall timing of CPD’s disaster program delivery to its grantees, resulting in funds being made available sooner to communities and their beneficiaries that are recovering from disasters.

### Time To Allocate and Award Disaster Grants Trended Upward Over Time

Our review of the time it took CPD to allocate and award disaster recovery funds included analyses of public laws enacted from 2001 to December 2022. As shown in figure 3, the average time taken to allocate and award noncompetitive grants varied, although it trended upward over time.<sup>11</sup>

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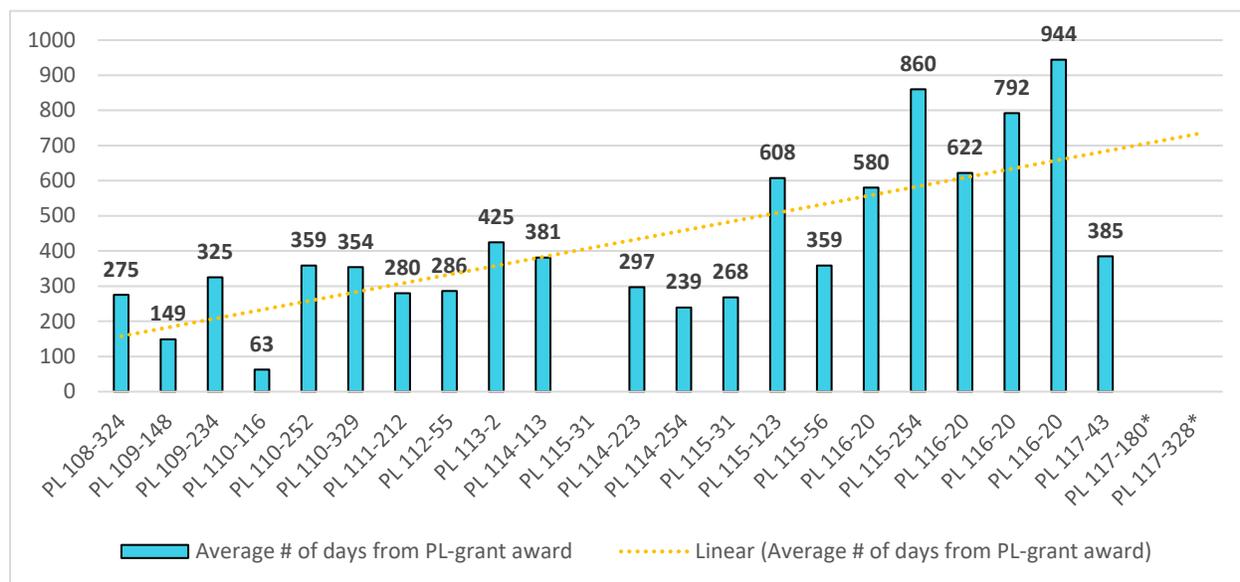
<sup>8</sup> PLs 115-254 and 116-20. See appendix E.

<sup>9</sup> A benchmark is a standard goal, in this case in days, that would be used to measure performance in the allocation and award of disaster recovery funds.

<sup>10</sup> A milestone is an identified step in CPD’s CDBG-DR allocation and award process.

<sup>11</sup> The three most recent public laws do not contain complete data as several steps in the process were not complete at the time of our review.

Figure 3: Average days from public law to noncompetitive grant award<sup>12 13</sup>



Source: OIG analysis of press releases, FR notices, and grant awards

\*CPD had not awarded any grants for Public Laws (PL) 117-180 and 117-328. These became law on September 30, 2022, and December 29, 2022, respectively. As of July 5, 2023, 278 days had elapsed since PL 117-180 was enacted and 188 days since PL 117-328 was enacted without grants being awarded.

For PL 117-43, CPD used its new Consolidated Notice<sup>14</sup> approach to allocate the funds. It had completed the allocation and grant award for about 87 percent of its total appropriations for this law within an average of 385 days, which demonstrated improvement in program timing. However, as of July 5, 2023, CPD had not awarded grants for the remaining 13 percent of allocated funds, which would cause the average days to grant execution in figure 3 to increase beyond 385 days. For example, as of July 5, 2023, if all grants had been awarded for PL 117-43, the average days to grant award would be 518 days. Over the period of our review, CPD had allocated and awarded other prior public law funds faster than it had for PL 117-43 and 117-180. In addition, Congress passed two additional appropriations on September 30, 2022, and December 29, 2022,<sup>15</sup> for which no grant agreement had been awarded as of July 5, 2023.<sup>16</sup>

<sup>12</sup> Duplicate public laws (PL 110-252, 115-31, 116-20, and 117-180) represent appropriated funds for multiple years of funding. Further, PL 110-252 and 115-31 resulted in amendments to some prior grants. We did not measure grant amendment award dates. For specific disasters funded and the public laws, see appendix E.

<sup>13</sup> Figure 3 excludes competitive and mitigation grants. These grants are discussed separately because their new and unique requirements resulted in lengthier grant allocation and award averages.

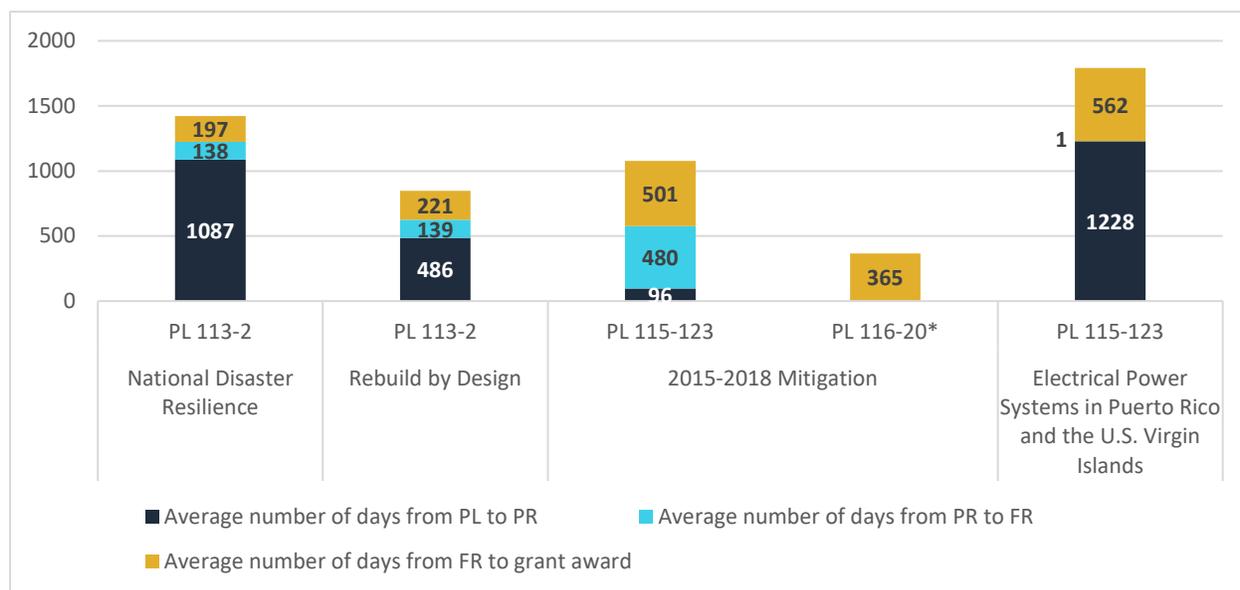
<sup>14</sup> 87 Federal Register (FR) notice 6364, issued February 3, 2022.

<sup>15</sup> PLs 117-180 and 117-328, respectively.

<sup>16</sup> CPD used the Consolidated Notice for these two additional public laws.

Since CPD had not fully allocated all funds or awarded all grants for the three most recent public laws, we could not calculate the average days from the public law to grant award for two of the public laws and the calculation for the other was based on incomplete data. For these three public laws, CPD had not awarded more than \$5.6 billion in grants as of July 5, 2023. In addition, we found that CPD took a significantly longer time to allocate and award competitive and mitigation grants than the noncompetitive grants, because they were competitive and new or unique grants. These grants included Rebuild by Design (RBD), National Disaster Resilience (NDR), 2015-2018 mitigation, and Puerto Rico and the U.S. Virgin Islands electrical and power system grants. Figure 4 shows the average days to execute competitive and mitigation grants.

**Figure 4: Average days to award competitive and mitigation grants, by milestones, as of July 5, 2023<sup>17</sup>**



Source: OIG analysis of press release dates, FR notice dates, and grant execution dates

\*For PL 116-20, HUD did not issue a press release. It took an average of 580 days from public law to FR notice and an average of 945 days from public law to grant award.

## CPD Did Not Meet Some Congressional Timing Requirements

We reviewed 24 disaster relief public laws between 2001 and 2022 and noted that 5 had congressional timing requirements. We found that CPD did not meet a requirement related to publishing its allocations and another requirement to allocate its funds within the prescribed timeframes.

### CPD Did Not Meet One Congressional Disaster Recovery Publishing Requirement

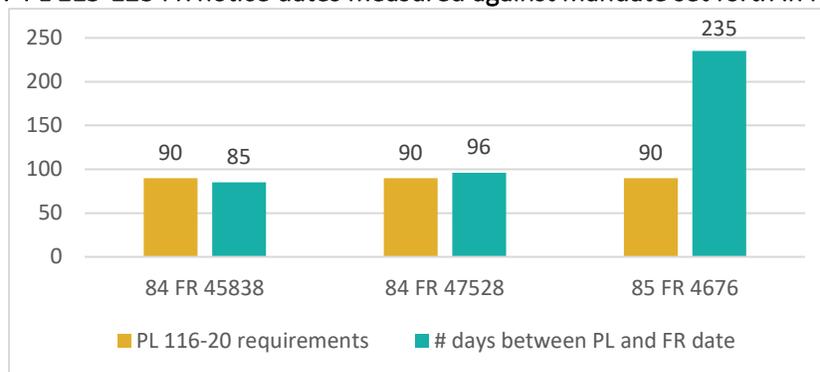
As shown in figure 5, CPD did not meet the 90-day congressional allocation publication requirement in one public law<sup>18</sup> for two of its funding allocations. While one allocation was missed by only 6 days, the other was missed by 145 days. As a result, two grantees, Puerto Rico and the Virgin Islands, did not

<sup>17</sup> HUD did not issue a press release for the PL 116-20 mitigation funds. Thus, we could not calculate the average number of days from the (1) public law to the press release and (2) press release to the FR notice.

<sup>18</sup> In PL 116-20, Congress required CPD to publish allocations of PL 115-123 in an FR notice within 90 days of enactment. See appendix F for the public laws' language.

receive \$9 billion in funding allocations until after the deadline. Therefore, these two grantees had to wait longer to complete their action plans, certifications, and other requirements that the FR notice laid out, ultimately resulting in delayed funding and program delivery to the final program participants or beneficiaries.

**Figure 5: PL 115-123 FR notice dates measured against mandate set forth in PL 116-20**



Source: OIG analysis of public law requirements and FR notices dates

#### CPD Did Not Meet One Public Law Allocation Requirement

Of the 24 disaster recovery-related public laws enacted by Congress from 2001 to 2022, 5 laws included language requiring HUD to allocate funds within a specified timeframe.<sup>19</sup> We found that CPD met the allocation requirements for four of the five public laws but did not meet it for PL 116-20. In that case, Congress required the funds to be allocated in 120 days, and it took CPD 180 days to publish the press release to allocate the funds.

CPD agreed that it did not meet PL 116-20’s statutory requirement largely due to forces outside its control, noting OMB’s significant involvement in the FR notice and the Government shutdown.<sup>20</sup>

### **Factors Affected the Timing of Disaster Recovery Grant Awards**

Several factors contributed to the increased amount of time it took to allocate and award grant funds and to be able to meet congressional timing requirements. Specifically, (1) the disaster recovery program lacks permanent authorizing legislation; (2) required coordination among multiple Federal agencies, HUD offices and grantees, and (3) other external and internal challenges. We also noted CPD did not consistently obtain, document, and track the various allocation and grant award milestones.

#### Congress Has Not Provided Permanent Legislative Authority for the Disaster Recovery Program

Over the years, Congress has authorized disaster recovery through supplemental appropriations. We and the U.S. Government Accountability Office (GAO) previously reported on the need for Congress to codify

<sup>19</sup> PLs 110-329, 113-2, 115-123, 116-20, and 117-43. PL 116-20 applied allocation deadlines to its own funding and that of PLs 115-254 and 115-123. See Appendix F for the laws.

<sup>20</sup> HUD OIG report 2019SU008945I, Review of HUD’s Disbursement of Grant Funds Appropriated for Disaster Recovery and Mitigation Activities in Puerto Rico, issued April 20, 2021.

a disaster recovery statute.<sup>21 22</sup> According to HUD, it lacks the authority to create a disaster recovery program without congressional authorization. While Congress has taken up the issue of codifying the program multiple times, it has not passed authorizing legislation.<sup>23</sup>

Because there is not a codified standard for HUD's disaster program, each law funding disaster recovery is distinct and must be reviewed anew each time Congress passes a public law involving disaster recovery funding. Thus, HUD must spend time studying, evaluating, and addressing each individual law that authorizes disaster recovery funding. Examples of previous distinctive requirements include:

- Providing funding for disasters that occurred in one or more prior years.
- Providing funding for disasters that might occur in a future period.
- Funding new or specific projects or activities like disaster mitigation and resiliency projects.
- Establishing grantee expenditure deadlines.
- Establishing requirements for grantees to have proficient financial controls and procurement processes.
- Imposing funding reductions or allocation deadlines on previous appropriations.

CPD did not track the amount of time it or others spent studying and evaluating each law.

Next, CPD drafts the FR notice that contains applicable rules, statutes, waivers, alternative requirements, and guidance. This process requires CPD to communicate with internal and external partners before the draft notice is complete and prepared for CPD's clearance process. During the clearance process, CPD responds to issues and inquiries, collects feedback, and ensures that it reviews and completes the process, which can take up to 60 days. CPD did not track the actual amount of time it or others spend on this process. During this time, experienced grantees would draft action plans based on prior disaster funding requirements, but they had to wait for the new allocating FR notices to determine specific requirements and make any necessary changes to their draft action plans. However, inexperienced grantees had to wait for the allocating FR notice to be issued to begin work on their action plans.<sup>24</sup>

#### Coordination Among Multiple Federal Agencies, HUD Offices, and Grantees During the Grant Process

The disaster recovery grant process is a coordinated effort involving three outside Federal agencies, four separate offices within HUD, and the various grantees. CPD does not have a role in completing some of

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<sup>21</sup> HUD OIG audit report 2018-FW-0002, HUD's Office of Block Grant Assistance Had Not Codified the Community Development Block Grant Disaster Recovery Program, issued July 23, 2018, and GAO Report GAO-21-569T, Disaster Block Grants Factors to Consider in Authorizing a Permanent Program, issued May 19, 2021.

<sup>22</sup> HUD OIG has issued recommendations that HUD codify the CDBG-DR program through regulations or if necessary, seek legislative authority to do so to standardize the process and simplify the requirements for grantees. In response, HUD has maintained that it does not have the statutory authority to codify the program requirements through the regulatory process. HUD is seeking that authority from Congress and is expressly supporting congressional authorization of the program in its Fiscal Year 2023 Congressional Budget Justification.

<sup>23</sup> House Bills H.R. 4557, 2017; H.R. 3702, 2019; H.R. 2809, 2021; and H.R. 4707, 2021 and Senate Bill S.2471, 2021

<sup>24</sup> We have previously reported that inexperienced grantees' (1) lack of familiarity with CDBG-DR program rules, and (2) lack of capacity and staffing to directly administer CDBG-DR programs can cause issues. See Lesson Learned and Key Considerations From Prior Audits and Evaluations of the CDBG-DR Program, report 2022-FW-0801, issued November 2, 2021.

the steps during this coordination, which takes the timeliness of those actions out of CPD's control. As one example, CPD and Office of Management and Budget engaged in extensive negotiations regarding mitigation funding, which resulted in an extended delay in apportionment impacting more than \$2 billion of funding which was allocated to 20 grantees. In addition, for HUD to determine the allocation amount, two outside agencies, FEMA and SBA, must provide their data through a data-sharing agreement to aid HUD in determining unmet needs. This sharing process can generally take up to 60 days. Neither CPD nor PD&R tracked the number of days that they took to complete this milestone. But in at least one case, it took more than 60 days. In that instance, the data-sharing agreement lapsed, which kept HUD from obtaining the data until a new agreement was signed.

After the three outside Federal agencies, and four separate offices within HUD complete the formula allocation, HUD's Secretary announces the allocation. Then, four offices within HUD work together to make the required allocation and FR notice publication in the manner described on Page 2. CPD did not track the number of days HUD's offices took to complete these milestones.

Once the FR notice allocating the funds is published, CPD waits for the grantees to complete their financial management, procurement, and compliance certifications and their action plans prior to awarding the funds. CPD has given grantees from 60 to 120 days to submit their certifications and action plans. CPD was tracking grantees compliance with this milestone. According to CPD's tracking data, 87 percent of the grantees met the action plan submission milestone. Thus, for 13 percent of the action plan milestones, the grantees contributed to a delay in the award of the grant.

#### Other External and Internal Challenges

Other challenges that affected the timing of HUD's allocation and award of disaster recovery funds included new grant types that increased allocation and grant execution timing and grantee certifications which delayed grant award. Additionally, in December 2018, a government shutdown of 35 days negatively impacted CPD's ability to allocate funds.

#### *New Grant Types Increased Allocation and Grant Award Timing*

HUD and Congress created new grant types which significantly increased allocation and grant award timing because doing so requires HUD to create new rules, processes, timelines, and deliverables. Specifically, HUD's competitive Rebuild by Design (RBD) and National Disaster Resilience (NDR) grants were created in response to recommendations by the Hurricane Sandy Rebuilding task force and totaled nearly \$1 billion each. The RBD competition consisted of four stages, each with its own process, timeline, and deliverables. Similarly, the NDR grants had their own process and timelines, which increased the time required to award the grants.

Congress also created mitigation grants in 2018 and appropriated \$12 billion to address damages resulting from future disasters for grantees impacted by 2015-2017 disasters. Consequently, CPD had to create and publish new rules for the mitigation grants, including, defining the purpose of the grants and the rules to address the award and administration of these funds, before CPD could allocate and award funds. These additional steps increased the time required to award the grants as shown in figure 4.

#### *Grantee Certifications Delayed Disaster Recovery Grant Award*

CPD attributed some of the delays to Congress requiring grantees to have proficient financial controls and procurement processes and that grantees establish adequate procedures to prevent any duplication of

benefits—a requirement not affecting laws enacted before 2013.<sup>25</sup> Specifically, CPD requires grantees to certify that they have proficient financial controls and procurement processes and have established adequate procedures to prevent any duplication of benefits before grantees can sign their grant agreements. Starting with the initial Consolidated Notice in 2022, grantees are allowed to use prior certifications for up to 3 years. Several grantees stated that this pre-award certification process was a time-consuming process and hindered the completion of their action plans. Starting with public law 115-123, CPD began collecting data on the various steps in the certification process. However, it did not use the data for benchmarking.<sup>26</sup>

### **Performance Data Was Not Always Obtained or Consistent Which Impacted CPD's Ability to Perform Benchmarking**

While CPD tracked the action plan submissions, it did not consistently obtain, document, and track the various allocation and grant award milestones or set benchmarks for the number of days it should take to reach a milestone across the universe of its disaster recovery grants. Even so, CPD staff were knowledgeable of the individual grant requirements and could articulate delays associated with individual public laws and individual grantees. Further, CPD had a documented process showing the milestones for disaster recovery grants as shown in figure 6. However, CPD did not always collect data for all the various milestone points in figure 6. For example, how long it takes (1) PD&R to collect data from FEMA, SBA, and others; (2) PD&R to generate the proposed allocation; and (3) the Office of Congressional and Intergovernmental Relations (CIR) to notify Congress. In addition, CPD did not clearly define the specific act of the Secretary allocating the funds in its process.

CPD's ODR stated it relied on multiple milestone points to be the allocation date, including (1) press releases, (2) web postings, (3) notification to Congress, and (4) Secretary approval of proposed allocation. CPD indicated that it used whichever milestone date was the earliest as the allocation date. Further, it did not always obtain or maintain data for all four milestone points in the grant allocation process. For example, it did not (1) track the date the Secretary allocated the funds to all grantees, (2) track the date CPD received notice that the Secretary allocated the funds to all grantee, (3) always issue a press release when allocating funds to all grantees, and (4) provide documentation to show that it always notified Congress that it had allocated the funds. Since CPD was not collecting milestone data for each of the four allocation points, CPD lacks consistent data to measure its performance at each point in the allocation process.

CPD used the earliest date of allocation based on its four allocation milestones which meant it did not usually use the FR notice allocating the funds as the allocation milestone and for performing benchmarking. This milestone generally took the longest amount of time. However, the FR notice date is the most accurate, relevant, and meaningful milestone date for grantees because the FR notice provides the actual allocation amount and provides grantees the specific requirements they must follow to submit their certifications and actions plans. Further, grantees are not notified when Congress is notified that funds are allocated. OPA said it used press releases to notify the public of allocations. But some press

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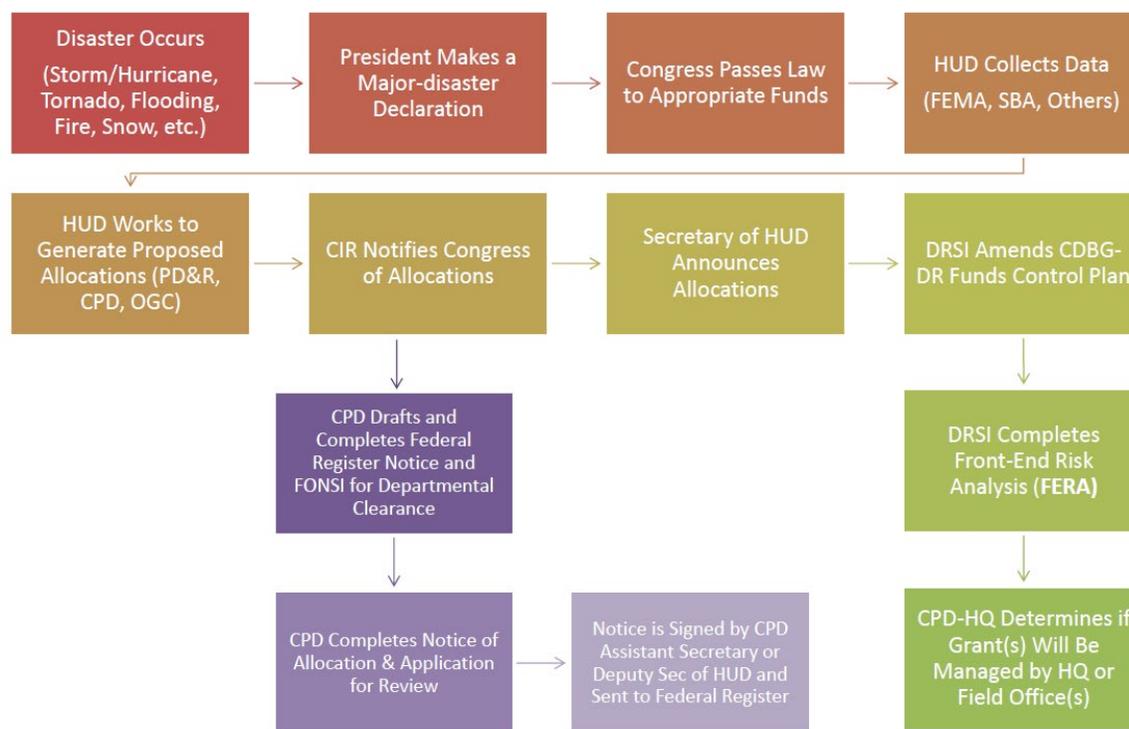
<sup>25</sup> Congress first included such language in the Disaster Relief Appropriations Act, 2013 - PL 113-2.

<sup>26</sup> As we previously reported, the complex certification process is necessary because of the significant amount of funding provided to some grantees and the risk that grantees, especially new and inexperienced ones, may not have proficient financial controls and procurement processes or experience with the disaster recovery program. See our report: Lesson Learned and Key Considerations From Prior Audits and Evaluations of the CDBG-DR Program, report 2022-FW-0801, issued November 2, 2021.

releases contained rounded amounts rather than the actual allocation amount and, in several instances, grantees were unaware of the press releases announcing fund allocations.

CPD did not have data for the milestones showing the time it spent studying the public laws or coordinating with other Federal agencies. Thus, it lacked data to create benchmarks and conduct consistent and meaningful comparisons of its performance regarding the timing of disaster recovery grant allocation. Establishing consistent timing benchmarks and maintaining data for each milestone stage of the program cycle would allow CPD and its stakeholders to accurately track and monitor the timing and performance of the grant process. Milestone data and timing benchmarks could provide valuable information that would be helpful to management when determining what improvements or enhancements to its process may be needed or guidance it can provide to staff to aid in improving program timing and, ultimately, delivery of grant funds to communities recovering from disasters.

**Figure 6: Disaster recovery grant process as illustrated by CPD**



Source: CDBG-DR Procedures Guidebook, July 1, 2021-before DRSI became ODR in January 2023.

**Note:** As stated above, CPD did not always collect data for the various milestone points in its documented process. In addition, CPD’s illustration does not contain a step showing when the Secretary allocates the funds.

## Opportunities Exist To Improve Disaster Recovery Program Timing

CPD had taken some action towards improving its disaster recovery program execution timing by issuing the Consolidated Notice. However, additional tools are available to CPD to improve its timing in the delivery of disaster recovery funds. As stated above, CPD lacks data to conduct consistent and meaningful studies of how long it is taking to reach each milestone in the grant process. Establishing consistent timing benchmarks and maintaining this data at each milestone of the program cycle will allow HUD CPD and its stakeholders to accurately track and monitor timing and performance of the program.

Timing benchmarks could provide valuable information that would be helpful to management when determining what improvements or enhancements may be needed to its process or guidance it can provide to staff to reduce delays and shorten the grant process. In addition, using a clearly defined and consistent method for allocating disaster funds could also help CPD accurately report when funds are allocated to grantees.

Since the initial publication of the Consolidated Notice in February 2022, CPD had published three additional FR notices<sup>27</sup> that contained the Consolidated Notice as appendix B. Although we were not able to measure the success of this innovative change due to a lack of time since implementation, according to CPD the change would likely contribute to reducing the time between the FR notice publication and grant award.

## Conclusion

Overall, CPD's time to complete the grant cycle for its disaster recovery program increased between 2001-2022. This ultimately resulted in grantees' receipt of funding and recovery of communities impacted by disasters being delayed. Additionally, CPD was unable to meet some congressional timing requirements. Several factors impacted CPD's ability to decrease the length of time for its disaster recovery program including (1) the disaster recovery program's lacking permanent authorizing legislation; (2) required coordination among multiple Federal agencies, various HUD offices, and the grantees; and (3) other external and internal issues. CPD has taken steps to improve the timing by issuing the Consolidated Notice. However, additional actions such as benchmarking are available to help reduce the length of time the grant execution process takes, thereby delivering disaster recovery funds to the grantees, and ultimately the final beneficiaries recovering from previous disasters, in a timelier manner.

## Recommendations

We recommend that the Director, Office of Disaster Recovery

- 1A. Collect and record the number of days that it or other entities take to complete each milestone in the grant process.
- 1B. Establish timing benchmarks for the milestones at each significant step in the allocation and award process based on actual data accumulated for the various grants.
- 1C. Take steps to ensure that the milestone point of allocation is formally defined and documented, to allow for accurate tracking of compliance with requirements.

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<sup>27</sup> 87 FR 31636, Appendix B, issued May 24, 2022, 88 FR 3198, Appendix B, issued January 18, 2023, and 88 FR 32046, Appendix B issued May 18, 2023.

## Scope and Methodology

We conducted the audit remotely from February 15, 2022, to July 10, 2023. The audit covered the disaster recovery program timing milestones from appropriation to grant execution from November 26, 2001, to June 6, 2019. Based on HUD CPD's statements, we expanded our scope to July 5, 2023.

To accomplish our audit objective, we reviewed

- 100 percent of the 21 public laws that appropriated the disaster recovery funds for our scope period of November 26, 2001, to June 6, 2019.<sup>28</sup>
- 100 percent of the 84 disaster recovery FR notices issued for the disaster recovery program to determine the timing and allocation of the funds, 37 of which allocated disaster recovery funding.<sup>29</sup>
- 52 press releases obtained from HUD's website, which were matched against the FR notice allocation amounts and appropriation amounts.
- 166 commitment letters obtained from CPD's budget office, which were tested for verification of the assignment of the funds.
- 80 hardcopy grant agreements obtained from prior audit work and from 20 grantees that we interviewed as part of this audit. We tested the grant agreement execution dates against data in the Disaster Recovery Grant Reporting (DRGR) system.
- 4 public laws for compliance with statutorily mandated allocation deadlines.<sup>30</sup>
- CPD's DRGR system handbooks, guidebooks, policies, procedures, and webpages to obtain an understanding of the program requirements.
- Our prior 2021 report that previously identified timing delays and status of open report recommendations.<sup>31</sup>
- The U.S. Government Accountability Office's (GAO testimony) report, entitled "GAO-21-569T, Disaster Block Grants: Factors to Consider in Authorizing a Permanent Program," issued May 19, 2021.
- The PD&R report, entitled "Housing Recovery and CDBG-DR: A Review of the Timing and Factors Associated with Housing Activities in HUD's Community Block Grant for Disaster Recovery Program."

Our initial universe consisted of \$85.8 billion allocated in 215 grants in HUD's DRGR system. After review, we excluded (1) 16 parent grants, which each represented the sum of 2 or more child grants, and (2) 1 test grantee that HUD maintained in the DRGR system. This process resulted in a revised universe of 198 grants awarded to 72 grantees, which totaled \$76.2 billion. We performed testing on the 198 grants.

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<sup>28</sup> See appendix C and F.

<sup>29</sup> See appendix D.

<sup>30</sup> We excluded a fifth public law (PL 111-212) from statutory compliance testing because Congress required that HUD obligate the funds within 90 days. All other public laws required HUD to allocate the funds. According to HUD, the statute also required that grantees submit an action plan proposing the use of all funds before the obligation of funds. Further, HUD said a grantee must first be notified of its allocation of funds to prepare the proposed action plan. HUD concluded that the statute's requirement to obligate in 90 days was impossible to meet. We determined that HUD did allocate the funds within 90 days.

<sup>31</sup> Report number 2019SU008945I, Review of HUD's Disbursement of Grant Funds Appropriated for Disaster Recovery and Mitigation Activities in Puerto Rico, issued April 20, 2021.

Testing included validating the DRGR's systems contract effective date with available hardcopy grant agreements that we obtained from OIG staff and the grantees interviewed during the audit, validating allocation amounts and grant amounts with amounts published in the press releases, and FR notices.

When we expanded our scope from June 7, 2019, to July 5, 2023, we reviewed

- 100 percent of three additional public laws that appropriated disaster recovery funds.<sup>32</sup>
- 100 percent of the four additional CDBG-DR FR notices issued for the disaster recovery program to determine the timing and allocation of the funds, all of which allocated disaster recovery funding.<sup>33</sup> This included reviewing Appendix B, "The Consolidated Notice," which was included in all four FR notices.
- Four additional press releases obtained from HUD's website, which were matched against the FR notice allocation amounts and appropriation amounts.
- One public law for its compliance with a statutorily mandated allocation deadline.

Using DRGR system data obtained on July 5, 2023, we identified 332 grants that had been executed during our fieldwork and during our scope expansion period. We excluded a total of 90 grants, which represented (1) parent grants that were the sum of 2 or more child grants, (2) competitive grants including NDR grants, and (3) mitigation grants. Thus, our revised universe consisted of \$78.5 billion allocated in 242 grants awarded to 90 grantees.<sup>34</sup>

We obtained and verified each CDBG-DR grant process milestone from appropriation to grant execution for the 242 grants, including measuring the following milestones:

- Appropriation – the enactment date when Congress appropriated disaster recovery funding.
- Allocation – two allocation points if available: the HUD press release date and the date of the FR notice that contained the allocations. We also verified that allocation amounts matched appropriation amounts and grant amounts.
- Grant execution – the date when the grantee executed its grant agreement.<sup>35</sup> We excluded grants with a future execution date after July 5, 2023, from this measurement. However, we calculated the number of days between the public law and July 5, 2023, for unexecuted grants to determine the number of days to grant execution as of July 5, 2023.

We interviewed HUD staff and officials to gain an understanding of the processes they complete to allocate and execute a grant agreement. We also interviewed 20 grantees to gain an understanding of how HUD's press releases and FR notices impacted the grantees' processes to create an action plan and eventually enter into a grant agreement. Of the 90 grantees in the universe, we used a nonstatistical approach and selected 20 for interviews that (1) were new to the program, (2) had a grant within the past year that were previous grantees, or (3) had more than one grant. The results of the interviews were not projected to the universe of grantees.

To achieve our objective, we relied in part on CPD's DRGR system. Although we did not perform a detailed assessment of the reliability of the data, we performed a minimal level of testing, which included

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<sup>32</sup> See appendix C and F.

<sup>33</sup> See appendix D.

<sup>34</sup> See appendix B.

<sup>35</sup> See appendix E.



comparing the data we downloaded from DRGR system to the hardcopy documents we obtained from previous audit work and grant agreement documentation we obtained from grantees we interviewed during this audit. Although there were a few inconsistencies, generally, we found the data to be adequately reliable for our purposes.

We determined that internal controls over compliance with laws and regulations, effectiveness and efficiency of operations, and reliability of financial reporting were relevant to our audit objective. We assessed the relevant controls. Based on our review, we believe that CPD should improve its controls to ensure that it can consistently document that it meets timing deadlines set by applicable statutes.

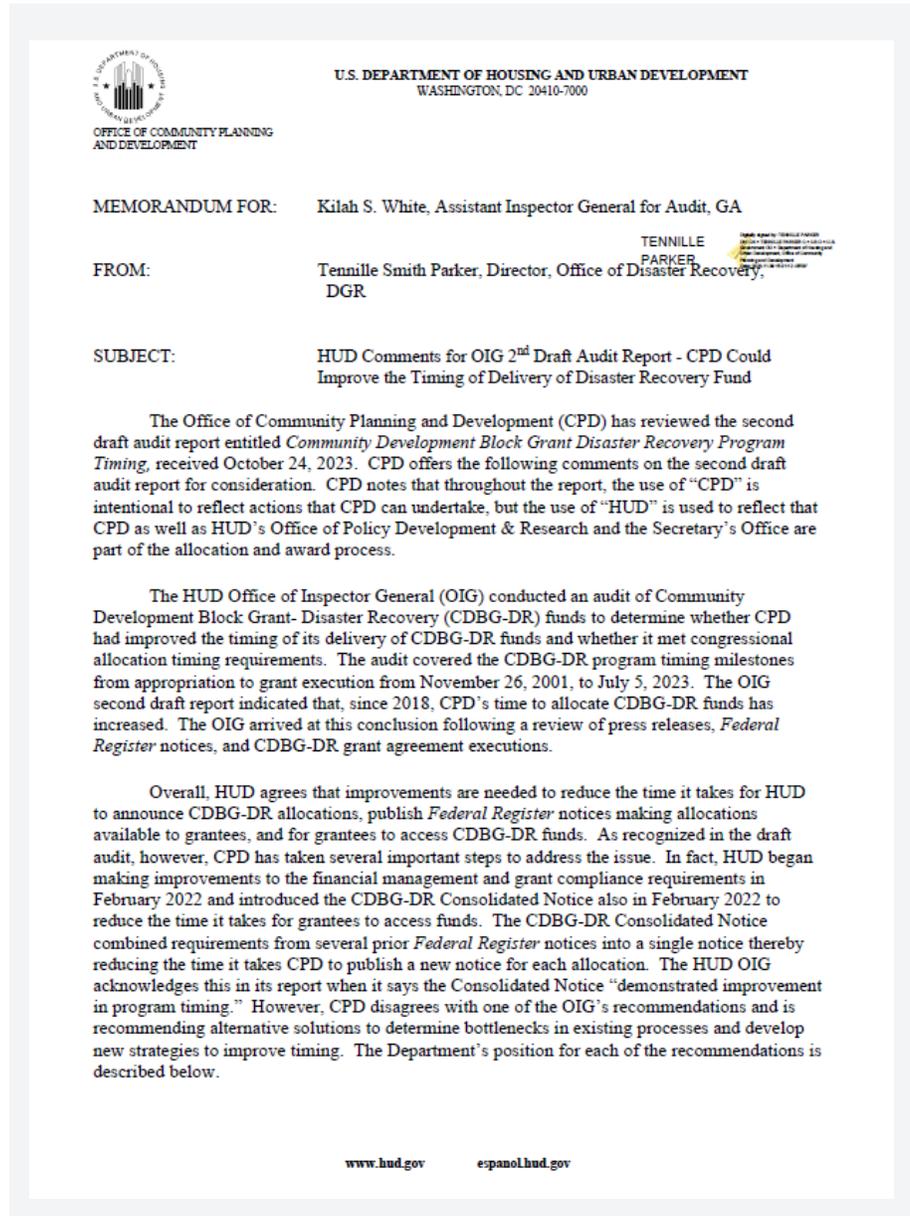
We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective(s). We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

# Appendixes

## Appendix A – Auditee Comments and OIG’s Evaluation

### Ref to OIG Evaluation - Auditee Comments

 **Comment 1 >**



  
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000  
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

MEMORANDUM FOR: Kilah S. White, Assistant Inspector General for Audit, GA

FROM: Tennille Smith Parker, Director, Office of Disaster Recovery, DGR  
TENNILLE PARKER  


SUBJECT: HUD Comments for OIG 2<sup>nd</sup> Draft Audit Report - CPD Could Improve the Timing of Delivery of Disaster Recovery Fund

The Office of Community Planning and Development (CPD) has reviewed the second draft audit report entitled *Community Development Block Grant Disaster Recovery Program Timing*, received October 24, 2023. CPD offers the following comments on the second draft audit report for consideration. CPD notes that throughout the report, the use of “CPD” is intentional to reflect actions that CPD can undertake, but the use of “HUD” is used to reflect that CPD as well as HUD’s Office of Policy Development & Research and the Secretary’s Office are part of the allocation and award process.

The HUD Office of Inspector General (OIG) conducted an audit of Community Development Block Grant- Disaster Recovery (CDBG-DR) funds to determine whether CPD had improved the timing of its delivery of CDBG-DR funds and whether it met congressional allocation timing requirements. The audit covered the CDBG-DR program timing milestones from appropriation to grant execution from November 26, 2001, to July 5, 2023. The OIG second draft report indicated that, since 2018, CPD’s time to allocate CDBG-DR funds has increased. The OIG arrived at this conclusion following a review of press releases, *Federal Register* notices, and CDBG-DR grant agreement executions.

Overall, HUD agrees that improvements are needed to reduce the time it takes for HUD to announce CDBG-DR allocations, publish *Federal Register* notices making allocations available to grantees, and for grantees to access CDBG-DR funds. As recognized in the draft audit, however, CPD has taken several important steps to address the issue. In fact, HUD began making improvements to the financial management and grant compliance requirements in February 2022 and introduced the CDBG-DR Consolidated Notice also in February 2022 to reduce the time it takes for grantees to access funds. The CDBG-DR Consolidated Notice combined requirements from several prior *Federal Register* notices into a single notice thereby reducing the time it takes CPD to publish a new notice for each allocation. The HUD OIG acknowledges this in its report when it says the Consolidated Notice “demonstrated improvement in program timing.” However, CPD disagrees with one of the OIG’s recommendations and is recommending alternative solutions to determine bottlenecks in existing processes and develop new strategies to improve timing. The Department’s position for each of the recommendations is described below.

[www.hud.gov](http://www.hud.gov) [espanol.hud.gov](http://espanol.hud.gov)

 **Comment 2 >**

CPD also strongly disagrees with the OIG's methodology in this audit. The OIG is comparing appropriations for CDBG-DR funds without identifying that each of the appropriations is different and unique and the report does not address how those differences impact the comparison. As CPD previously noted, each appropriation of CDBG-DR funds can be different, with new provisions that the Office of Disaster Recovery (ODR) must address by creating new requirements and addressing them in a *Federal Register* notice. As most supplemental appropriations are unique and new, with different provisions established by Congress, comparing these appropriations to each other does not accurately describe how ODR must respond to each appropriation individually. For example, some appropriations covered multiple disaster years, including previously funded disaster years. In some cases, an appropriation is not sufficient to cover 100 percent of the identified unmet needs for that disaster year, which means HUD will only partially fund a disaster year's unmet needs. As a result of these circumstances, the same grantee may have multiple appropriations for the same disaster and ODR must issue multiple grant agreements or grant agreement amendments for these awards as well as issuing multiple *Federal Register* notices to establish the rules of the grants. Thus, comparing the time it takes for HUD to make allocations or issue *Federal Register* notices while not quantifying or qualifying the impact of these variations among the appropriations does not provide an accurate assessment of the time necessary for grantees to access CDBG-DR funds.

 **Comment 3 >**

Additionally, it is important to note that the following statements made by the OIG are missing relevant context that should be added to the report: "*as shown in figure 5, CPD did not meet the 90-day congressional allocation publication requirement in one public law 18 for two of its funding allocations,*" and "*we found that CPD met the allocation requirements for four of the five public laws but did not meet it for PL 116-20.*" HUD is providing the context for these [actions](#).

**OIG Finding 1:** CPD's time to deliver disaster program funds to grant recipients varied between 2001 and 2022 and trended upward.

**OIG Recommendation 1A:** Collect and record the number of days that it or other entities take to complete each milestone in the grant process.

 **Comment 4 >**

**HUD Comment:** CPD agrees with the HUD OIG's recommendation to broaden its existing milestone tracking to include the number of days that it takes to complete various milestones that are similar with every appropriation. CPD will use the data captured in this expanded tracker to identify bottlenecks over the course of one year, or until the CDBG-DR grant is permanently authorized, whichever is sooner. CPD will evaluate the milestone trends identified in the Program Timing Tracker to inform CPD's internal procedures that are within CPD's control.

**OIG Recommendation 1B:** Establish timing benchmarks for the milestones at each significant step in the allocation and award process based on actual data accumulated for the various grants.

 **Comment 5 >**

**HUD Comment:** CPD agreed with the HUD OIG's recommendation to broaden CPD's existing milestone tracking to include the number of days it takes to complete various milestones. However, HUD does not agree with the recommendation to establish timing benchmarks for each milestone because there are external factors that prevent CPD from completing some of the steps of the

allocation and award process. As noted in this response and the OIG's report, CPD has identified several factors that are outside of its control that will continue to contribute to the delay in getting CDBG-DR grantees to a signed grant agreement. The OIG acknowledges this here:

“CPD’s increase in time to deliver disaster program funds and its inability to meet a few of the statutory requirements were caused by (1) the disaster recovery program’s lacking permanent authorizing legislation; (2) required coordination among multiple Federal agencies, various HUD offices, and the grantees; and (3) other external and internal issues.”

Additionally, the OIG timeline also included the years when the country was fighting a national emergency and global pandemic- the Coronavirus Disease 2019 (COVID-19). Delays due to COVID-19 and the number of extensions and other forms of administrative relief provided across the federal government to help states and local governments skew the timing data used in this report. Nevertheless, COVID-19 or other obstacles resulted in many CDBG-DR grantees requesting extensions from CPD to secure more time to develop action plans and to carry out community engagement activities. For some additional context, CDBG-DR grantees must often go to the local governing boards to seek approval of a draft CDBG-DR action plan, and this can also take additional time which require extensions. HUD works with its grantees to approve extensions for good cause, which would then add to the time it takes to achieve grant agreement execution. For example, under Public Law. 117-43, over 70 percent of the grantees receiving awards asked for extensions (more time) to submit an action plan. CPD requests that the OIG's report acknowledges that most of these factors were outside of CPD's control and revise its recommendations accordingly.

 **Comment 5 >**

There are two primary concerns that CPD has regarding this report. First, in the absence of authorization of CDBG-DR as a program, with an annual appropriation and promulgated regulations, the variation in appropriations language and the changing priorities of various Administrations will continue to present factors beyond CPD's control that will impact the timing of the delivery of CDBG-DR assistance.

For example, each appropriation may establish new or modified requirements so CPD must adapt and modify its existing policies, making it infeasible to establish consistent benchmarks that be compared to each other.

 **Comment 5 >**

Second, CPD does not have the authority to establish criteria for the internal and external partners involved in this process. For example, Congress appropriates CDBG-DR funds, but HUD must wait for other Federal agencies to provide data to inform the CDBG-DR allocation. Data may be updated multiple times over a series of months, depending on when our Federal partners have this data available and are able share it.

 **Comment 6 >**

Instead of establishing timing benchmarks for each milestone in the allocation and award process, ODR proposes to analyze the data collected through the Program Timing Tracker. CPD proposes to use the data to determine bottlenecks in the existing processes and meet with stakeholders to develop new strategies to improve its existing processes when these processes are within HUD's sphere of influence.

**OIG Recommendation 1C:** Take steps to ensure that the milestone point of allocation is formally defined and documented, to allow for accurate tracking of compliance with requirements.

 **Comment 6 >**

HUD Comment: HUD does not agree with the recommendation to formally define the point of allocation because of the “ad hoc” nature of how CDBG-DR funds are appropriated. Without an annual appropriation and consistent regulations, there is too much variance for how CDBG-DR funds are appropriated. If in the future, CDBG-DR is codified, HUD and Congress may decide to define the point of allocation, however currently Congressional intent on the point of allocation can vary with each appropriation. For example, many of the CDBG-DR appropriation laws don’t set forth timeframes for allocations, so the point of allocation is not relevant. When laws do set timeframes for allocations, those requirements are specific to those disasters. Therefore, the point of allocation must respond to the specific circumstances of that individual appropriation making it impossible for HUD to consistently define. Instead, CPD proposes to capture milestones in the Program Timing Tracker to identify bottlenecks over the course of one year or until the CDBG-DR grant is permanently authorized, whichever is sooner.

Should you have any questions regarding these draft audit report comments, please do not hesitate to contact me or Shantelle C. Dale, Operations Division Director, at [Shantelle.C.Dale@hud.gov](mailto:Shantelle.C.Dale@hud.gov).

HUD CPD’s response contained a hyperlink on page 2. We have included that link here [[actions](#)].

## OIG Evaluation of Auditee Comments

### Comment 1

CPD agrees that improvements are needed to reduce the time it takes to announce CDBG-DR allocations, publish *Federal Register* notices making allocations available to grantees, and for grantees to access CDBG-DR funds. It discussed recent steps it has taken toward improving allocation timing. In addition, CPD disagreed with one of the OIG recommendations and recommended alternative solutions, which it discussed later in its response.

We acknowledge CPD's statements and agree it needs to make improvements. We discuss CPD's disagreements and alternative solutions below.

### Comment 2

CPD strongly disagreed with the OIG's audit methodology. It stated that each disaster recovery appropriation is unique and said HUD OIG did not address how those differences impacted the comparison of timing. It also stated that not quantifying each variation and impact of those variations did not provide an accurate assessment of the time needed to enable grantees to access the funds.

We agree that each disaster recovery appropriation is unique. However, all HUD disaster recovery funding contains three universal timing points: (1) Congress appropriates the funds, (2) HUD allocates the funds, and (3) HUD and the grantees execute a grant agreement. The report states that CPD is not obtaining data for these three timing and other milestone points. As CPD lacks such data, it is not able to determine whether it is improving or not in providing the funds in a timely manner. If CPD had collected and maintained data concerning how long it took to review each appropriation, it would have been able to show the impact of the "unique" appropriations. Further, we noted in the report that the uniqueness of appropriations and the need to study each appropriation contributed to the cause of delays.

### Comment 3

CPD stated that OIG was missing relevant context that should be added to the report regarding the following two statements: "*as shown in figure 5, CPD did not meet the 90-day congressional allocation publication requirement in one public law<sup>18</sup> for two of its funding allocations,*" and "*we found that CPD met the allocation requirements for four of the five public laws but did not meet it for PL 116-20,*". For context, it provided a link to an NBC news article "*HUD officials knowingly failed 'to comply with the law,' stalled Puerto Rico hurricane relief funds*" dated October 18, 2019.

The article did not provide complete context for the two report statements. The article stated that only Puerto Rico did not meet the Congressional requirement for a funding notice. Our work noted that PL 116-20 had two different requirements: (1) required the Secretary to publish the allocation for all PL 115-123 grantees in a FR notice within 90 days of the law's enactment; and (2) required the Secretary

allocate 33 percent of the funds within 120 days to PL 116-20 and PL 115-254 grantees. CPD did not publish the \$9 billion allocation from PL 115-123 in a FR notice for two grantees, Puerto Rico and the Virgin Islands, within the 90-day requirement cited in PL 116-20. An additional 20 grantees, including Puerto Rico, did not receive more than \$2 billion in allocations from PL 116-20 in a press release until 180 days after the law's enactment.

**Comment 4**

CPD agreed with OIG's recommendation 1A to broaden its existing milestone tracking to include the number of days that it takes to complete various milestones that are similar with every appropriation. CPD will use the data captured in this expanded tracker to identify bottlenecks over the course of one year, or until the CDBG-DR grant is permanently authorized, whichever is sooner.

We appreciate CPD's statements that it will broaden its existing milestone tracking. However, we do not believe that it is sufficient for CPD to collect data for only one year or until Congress permanently authorizes the program. Congress has provided CDBG-DR funding since 1992 and disasters are occurring with increasing devastating frequency. As various stakeholders all have concerns about delays in allocating and awarding CDBG-DR program funds, CPD should track the amount of time it takes to allocate and award all current and future appropriated funds. Doing so would enable CPD to use this data to identify and make improvements in its processes to speed the delivery of disaster funds to future impacted communities.

**Comment 5**

CPD agreed with recommendation 1B to broaden its existing milestone tracking to include the number of days it takes to complete various milestones. However, it does not agree with the recommendation to establish timing benchmarks for each milestone because there are external factors that prevent CPD from completing some of the steps of the allocation and award process. CPD discussed that OIG acknowledged factors outside its control within the report. It also provided examples of situations that impacted allocation timing, including COVID-19. CPD requested that the OIG report acknowledge factors it discussed were outside its control and revise the recommendations accordingly. In addition, CPD stated it had two primary concerns about the report: (1) variations in appropriations language and changing priorities of various administrations present factors beyond CPD's controls that will impact the timing of delivery of CDBG-DR assistance because the CDBG-DR program lacks permanent authorization and (2) CPD does not have the authority to establish criteria for external and internal partners involved in the process.

We acknowledge CPD's statements that it will broaden its existing milestone tracking, and the report discussed several of the internal and external challenges raised by CPD. The report and its recommendations did not require CPD to establish control over various factors in the process or to establish criteria for internal and external partners. In addition, the report noted that the lack of codification of the CDBG-DR program and some external and internal challenges outside of CPD's control delayed the timing of fund allocation and award. We also

are not suggesting that CPD is accountable for delays caused by other internal and external entities.

Instead, the report recommends that CPD set benchmarks, including the amount of time it takes its partners to complete tasks, and then track the amount of time spent by all entities at the various steps in the process including the steps where CPD has control and where it does not. Further, if CPD tracks the amount of time other internal and external entities spend on their steps, it would have data to support when unusual or lengthy delays happen that are outside its control, allowing CPD to make data driven decisions regarding any potential enhancements to its allocation process. As such, we did not revise the report or recommendation.

#### **Comment 6**

CPD does not agree with recommendation 1C to formally define the point of allocation because of the “ad hoc” nature of how CDBG-DR funds are appropriated and the variance in appropriations. It further stated that since many laws do not have timeframes for allocation the point of allocation is not relevant, and it is impossible for HUD to consistently define it. Instead, CPD proposes to capture milestones in the Program Timing Tracker to identify bottlenecks over the course of one year or until the CDBG-DR grant is permanently authorized, whichever is sooner.

We agree with CPD that there are variances in each disaster appropriation. The report discusses that Congress funds the CDBG-DR program using supplemental appropriations, which vary in their language and requirements. Further, Congress gave HUD’s Secretary the responsibility to allocate or award the funds in many of the laws, and HUD published all the CDBG-DR grantee allocations we reviewed in FR notices. However, we strongly believe that the point of allocation is relevant in the CDBG-DR funding process. The allocation date is both an important milestone in the CDBG-DR funding process and a point when HUD designates a specific amount of funds to a specific grantee. CPD was using four allocation milestones as the point of allocation, and it did not have complete data for all grantees for all four milestone points. The intent of the recommendation is to have CPD define one milestone point as the allocation date, not the means or manner of communicating an allocation, and to document that information so it can be collected and available for interested entities such as Congress, GAO, HUD OIG, other Federal agencies, grantees, and the public. Doing so will allow CPD to collect, consistently measure, and evaluate the amount of time it takes to allocate CDBG-DR funds. We discussed our disagreement with CPD’s proposal to track information for one year or until permanently authorized in comment 4.

## Appendix B – List of Grants Reviewed<sup>36</sup>

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
<b>1</b>		<b>Alabama</b>	
	1	B-05-DJ-01-0001	\$ 10,965,311
	2	B-06-DG-01-0001	74,388,000
	3	B-06-DG-01-0002	21,225,574
	4	B-12-DT-01-0001	24,697,966
	5	B-13-DS-01-0001	49,157,000
	6	B-21-DZ-01-0001	501,252,000
<b>2</b>		<b>Alaska</b>	
	7	B-19-DT-02-0001*	2,288,000
	8	B-19-DV-02-0001	35,856,000
	9	B-23-DN-02-0001*	38,493,000
<b>3</b>		<b>American Samoa</b>	
	10	B-19-DT-60-0001*	1,470,000
	11	B-19-DV-60-0001	16,539,000
	12	B-19-DV-60-0002	6,500,000
<b>4</b>		<b>Arkansas</b>	
	13	B-08-DF-05-0001	4,747,501
	14	B-08-DI-05-0001	90,475,898
	15	B-19-DF-05-0001	8,940,000
<b>5</b>		<b>Baton Rouge, LA</b>	
	16	B-21-MF-22-0003*	4,648,000
	17	B-22-MF-22-0003*	3,038,000
<b>6</b>		<b>Birmingham, AL</b>	
	18	B-12-MT-01-0001	6,386,326
	19	B-13-MS-01-0001	17,497,000
<b>7</b>		<b>California</b>	
	20	B-05-DJ-06-0001	10,403,120
	21	B-08-DI-06-0001	40,061,051
	22	B-13-DS-06-0001	70,359,459
	23	B-18-DP-06-0001	124,155,000
	24	B-18-DP-06-0002	88,219,000
	25	B-19-DP-06-0001	38,057,527
	26	B-19-DT-06-0001	64,907,000
	27	B-19-DV-06-0001	491,816,000
	28	B-19-DV-06-0002	525,583,000
	29	B-21-DF-06-0001*	14,761,000

<sup>36</sup> This listing includes all grants reviewed, including RBD, NDR, and mitigation grants.

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	30	B-21-DZ-06-0001*	231,203,000
	31	B-22-DF-06-0001*	9,647,000
<b>8</b>		<b>Chicago, IL</b>	
	32	B-13-MS-17-0001	63,075,000
<b>9</b>		<b>Colorado</b>	
	33	B-08-DF-08-0001	588,657
	34	B-13-DS-08-0001	320,346,000
	35	B-21-DF-08-0001	7,415,000
	36	B-22-DF-08-0001*	4,846,000
<b>10</b>		<b>Columbia, SC</b>	
	37	B-16-MH-45-0001	26,155,000
	38	B-18-MP-45-0001	18,585,000
<b>11</b>		<b>Connecticut – DOH</b>	
	39	B-13-DS-09-0001	159,279,000
	40	B-13-DS-09-0002	54,277,359
<b>12</b>		<b>Cook County, IL</b>	
	41	B-13-US-17-0001	83,616,000
<b>13</b>		<b>Cranston, RI</b>	
	42	B-10-MF-44-0001	1,234,434
<b>14</b>		<b>Dallas, TX</b>	
	43	B-21-MF-48-0003*	24,433,000
	44	B-22-MF-48-0003*	15,967,000
<b>15</b>		<b>Dauphin County, PA</b>	
	45	B-12-UT-42-0001	6,415,833
	46	B-13-US-42-0001	7,632,000
<b>16</b>		<b>Dearborn, MI</b>	
	47	B-21-MF-26-0003	16,332,000
	48	B-22-MF-26-0003*	10,673,000
<b>17</b>		<b>Detroit, MI</b>	
	49	B-21-MF-26-0002*	57,591,000
	50	B-22-MF-26-0002*	37,637,000
<b>18</b>		<b>DuPage County, IL</b>	
	51	B-13-US-17-0002	31,526,000
<b>19</b>		<b>Empire State Development Corporation (NYS)</b>	
	52	B-01-DW-36-0001	700,000,000
	53	B-02-DW-36-0001	2,000,000,000
	54	B-02-DW-36-0002	783,000,000
<b>20</b>		<b>Florida</b>	
	55	B-05-DJ-12-0001	98,930,861
	56	B-06-DG-12-0001	79,221,507

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	57	B-06-DG-12-0002	97,130,301
	58	B-08-DI-12-0001	103,574,429
	59	B-16-DL-12-0001	117,937,000
	60	B-17-DM-12-0001	615,922,000
	61	B-18-DP-12-0001	157,676,000
	62	B-18-DP-12-0002	633,485,000
	63	B-19-DP-12-0001	38,637,745
	64	B-19-DT-12-0001	46,926,000
	65	B-19-DV-12-0001	448,023,000
	66	B-19-DV-12-0002	287,530,000
	67	B-21-DZ-12-0001	187,383,000
	68	B-23-DN-12-0001*	910,624,000
<b>21</b>		<b>Fort Worth, TX</b>	
	69	B-21-MF-48-0004*	16,614,000
	70	B-22-MF-48-0004*	10,858,000
<b>22</b>		<b>Georgia</b>	
	71	B-08-DI-13-0001	5,209,460
	72	B-18-DP-13-0001	37,943,000
	73	B-18-DP-13-0002	26,961,000
	74	B-19-DP-13-0001	13,015,596
	75	B-19-DT-13-0001	2,669,000
	76	B-19-DV-13-0001	34,884,000
	77	B-19-DV-13-0002	6,953,000
<b>23</b>		<b>Hawaii County, HI</b>	
	78	B-19-UT-15-0001	6,862,000
	79	B-19-UV-15-0001	66,890,000
	80	B-19-UV-15-0002	40,671,000
<b>24</b>		<b>Houston, TX</b>	
	81	B-16-MH-48-0001	87,092,000
	82	B-18-MP-48-0001	61,884,000
	83	B-21-MF-48-0002*	30,296,000
	84	B-22-MF-48-0002*	19,799,000
<b>25</b>		<b>Illinois</b>	
	85	B-08-DF-17-0001	17,341,434
	86	B-08-DI-17-0001	193,700,004
	87	B-13-DS-17-0001	10,400,000
<b>26</b>		<b>Indiana – OCRA</b>	
	88	B-08-DF-18-0001	67,012,966
	89	B-08-DI-18-0001	372,546,531
<b>27</b>		<b>Iowa</b>	

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	90	B-08-DF-19-0001	156,629,974
	91	B-08-DI-19-0001	734,178,651
	92	B-13-DS-19-0001	96,887,177
	93	B-19-DF-19-0001	96,741,000
	94	B-21-DZ-19-0001	57,566,000
<b>28</b>		<b>Jefferson County, AL</b>	
	95	B-12-UT-01-0001	7,847,084
	96	B-13-US-01-0001	9,142,000
<b>29</b>		<b>Jefferson Parish, LA</b>	
	97	B-13-US-22-0001	16,453,000
<b>30</b>		<b>Joplin, MO</b>	
	98	B-12-MT-29-0001	45,266,709
	99	B-13-MS-29-0001	113,276,000
<b>31</b>		<b>Kauai County, HI</b>	
	100	B-19-UT-15-0002	585,000
	101	B-19-UV-15-0003	9,176,000
<b>32</b>		<b>Kentucky</b>	
	102	B-08-DI-21-0001	3,717,686
	103	B-10-DF-21-0001	13,000,000
	104	B-21-DF-21-0001	74,953,000
	105	B-22-DF-21-0001*	48,983,000
	106	B-23-DN-21-0001*	297,994,000
<b>33</b>		<b>Lake Charles, LA</b>	
	107	B-21-MF-22-0002*	10,776,000
	108	B-22-MF-22-0002*	7,042,000
<b>34</b>		<b>Lee County, FL</b>	
	109	B-23-UN-12-0002	1,107,881,000
<b>35</b>		<b>Lexington County, SC</b>	
	110	B-16-UH-45-0001	21,370,000
	111	B-18-UP-45-0001	15,185,000
<b>36</b>		<b>Louisiana</b>	
	112	B-06-DG-22-0001	6,210,000,000
	113	B-06-DG-22-0002	4,200,000,000
	114	B-08-DG-22-0003	3,000,000,000
	115	B-08-DI-22-0001	1,093,212,571
	116	B-13-DS-22-0001	64,379,084
	117	B-13-DS-22-0002	92,629,249
	118	B-16-DL-22-0001	1,708,407,000
	119	B-18-DP-22-0001	1,213,917,000
	120	B-21-DF-22-0001	1,272,346,000

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	121	B-21-DZ-22-0001	1,050,267,000
	122	B-22-DF-22-0001*	831,502,000
<b>37</b>		<b>Luzerne County, PA</b>	
	123	B-12-UT-42-0002	15,738,806
	124	B-13-US-42-0002	9,763,000
<b>38</b>		<b>Maine</b>	
	125	B-08-DF-23-0001	2,187,114
<b>39</b>		<b>Maryland</b>	
	126	B-05-DJ-24-0001	2,062,131
	127	B-13-DS-24-0001	28,640,000
<b>40</b>		<b>Massachusetts</b>	
	128	B-13-DS-25-0001	7,210,000
<b>41</b>		<b>Memphis, TN</b>	
	129	B-10-MF-47-0001	6,264,239
<b>42</b>		<b>Michigan</b>	
	130	B-21-DF-26-0001*	12,033,000
	131	B-21-DZ-26-0001*	59,898,000
	132	B-22-DF-26-0001*	7,864,000
<b>43</b>		<b>Minnesota</b>	
	133	B-08-DF-27-0001	925,926
<b>44</b>		<b>Minot, ND</b>	
	134	B-12-MT-38-0001	67,575,964
	135	B-13-MS-38-0001	35,056,000
	136	B-13-MS-38-0002	74,340,770
<b>45</b>		<b>Mississippi</b>	
	137	B-06-DG-28-0001	5,058,185,000
	138	B-06-DG-28-0002	423,036,059
	139	B-08-DF-28-0001	2,267,361
	140	B-08-DI-28-0001	11,679,873
	141	B-21-DF-28-0001*	8,406,000
	142	B-21-DZ-28-0001	36,684,000
	143	B-22-DF-28-0001*	5,494,000
<b>46</b>		<b>Missouri</b>	
	144	B-08-DF-29-0001	11,032,438
	145	B-08-DI-29-0001	97,605,490
	146	B-12-DT-29-0001	8,719,059
	147	B-13-DS-29-0001	11,844,000
	148	B-18-DP-29-0001	58,535,000
	149	B-18-DP-29-0002	41,592,000
	150	B-19-DF-29-0001	30,776,000

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	151	B-19-DP-29-0001	9,847,018
<b>47</b>		<b>Montana</b>	
	152	B-08-DF-30-0001	666,666
<b>48</b>		<b>Moore, OK</b>	
	153	B-13-MS-40-0001	52,200,000
<b>49</b>		<b>Nashville-Davidson, TN</b>	
	154	B-10-MF-47-0002	33,089,813
	155	B-21-MF-47-0002*	5,151,000
	156	B-22-MF-47-0002*	3,367,000
<b>50</b>		<b>Nebraska</b>	
	157	B-08-DF-31-0001	5,557,736
	158	B-19-DF-31-0001	108,938,000
<b>51</b>		<b>New Jersey</b>	
	159	B-12-DT-34-0001	15,598,506
	160	B-13-DS-34-0001	4,174,429,000
	161	B-13-DS-34-0002	15,000,000
	162	B-21-DF-34-0001	228,346,000
	163	B-22-DF-34-0001*	149,229,000
<b>52</b>		<b>New Orleans, LA</b>	
	164	B-13-MS-22-0001	15,031,000
	165	B-13-MS-22-0002	141,260,569
<b>53</b>		<b>New York</b>	
	166	B-12-DT-36-0001	71,654,116
	167	B-13-DS-36-0001	4,416,882,000
	168	B-13-DS-36-0002	35,800,000
	169	B-21-DF-36-0001*	41,262,000
	170	B-22-DF-36-0001*	26,966,000
<b>54</b>		<b>New York City, NY</b>	
	171	B-13-MS-36-0001	4,213,876,000
	172	B-13-MS-36-0002	176,000,000
	173	B-21-MF-36-0002*	187,973,000
	174	B-22-MF-36-0002*	122,844,000
<b>55</b>		<b>North Carolina</b>	
	175	B-05-DJ-37-0001	4,397,390
<b>56</b>		<b>North Carolina-NCORR</b>	
	176	B-16-DL-37-0001	236,529,000
	177	B-18-DP-37-0001	168,067,000
	178	B-19-DT-37-0001	34,619,000
	179	B-19-DV-37-0001	336,521,000
	180	B-19-DV-37-0002	206,123,000

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	181	B-21-DF-37-0001	7,975,000
	182	B-22-DF-37-0001*	5,211,000
<b>57</b>		<b>North Dakota-DOC</b>	
	183	B-12-DT-38-0001	11,782,684
	184	B-13-DS-38-0001	6,564,951
<b>58</b>		<b>Northern Mariana Islands</b>	
	185	B-19-DT-69-0001	16,225,000
	186	B-19-DV-69-0001	188,652,000
	187	B-19-DV-69-0002	65,672,000
<b>59</b>		<b>Ohio</b>	
	188	B-05-DJ-39-0001	1,971,541
	189	B-19-DF-39-0001	12,305,000
<b>60</b>		<b>Oklahoma</b>	
	190	B-08-DF-40-0001	1,793,876
	191	B-13-DS-40-0001	93,700,000
	192	B-19-DF-40-0001	36,353,000
	193	B-23-DN-40-0001*	7,473,000
<b>61</b>		<b>Orange County, FL</b>	
	194	B-23-UN-12-0003*	219,712,000
<b>62</b>		<b>Orange County, NY</b>	
	195	B-12-UT-36-0001	11,422,029
<b>63</b>		<b>Oregon</b>	
	196	B-21-DZ-41-0001	422,286,000
<b>64</b>		<b>Pennsylvania</b>	
	197	B-05-DJ-42-0001	2,444,852
	198	B-12-DT-42-0001	27,142,501
	199	B-13-DS-42-0001	29,986,000
	200	B-21-DF-42-0001*	23,152,000
	201	B-22-DF-42-0001*	15,130,000
<b>65</b>		<b>Philadelphia, PA</b>	
	202	B-21-MF-42-0002*	98,701,000
	203	B-22-MF-42-0002*	64,503,000
<b>66</b>		<b>Puerto Rico</b>	
	204	B-05-DJ-72-0001	7,998,964
	205	B-08-DI-72-0001	29,982,887
	206	B-17-DM-72-0001	1,507,179,000
	207	B-18-DE-72-0001	1,932,347,000
	208	B-18-DP-72-0001	8,220,783,000
	209	B-18-DP-72-0002	8,285,284,000
	210	B-19-DF-72-0001	36,424,000

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	211	B-19-DP-72-0001	277,853,230
	212	B-21-DZ-72-0001	184,626,000
	213	B-23-DN-72-0001*	165,645,000
	214	B-23-DN-72-0002*	667,000
<b>67</b>		<b>Rhode Island</b>	
	215	B-10-DF-44-0001	8,935,237
	216	B-13-DS-44-0001	19,911,000
<b>68</b>		<b>Richland County, SC</b>	
	217	B-16-UH-45-0002	30,770,000
	218	B-18-UP-45-0002	21,864,000
<b>69</b>		<b>San Marcos, TX</b>	
	219	B-16-MH-48-0002	33,794,000
	220	B-18-MP-48-0002	24,012,000
<b>70</b>		<b>Sarasota County, FL</b>	
	221	B-23-UN-12-0004*	201,535,000
<b>71</b>		<b>Shelby County, TN</b>	
	222	B-10-UF-47-0001	3,735,139
	223	B-13-US-47-0001	7,463,750
	224	B-13-US-47-0002	60,445,163
<b>72</b>		<b>South Carolina Office of Resilience</b>	
	225	B-16-DH-45-0001	126,698,000
	226	B-16-DL-45-0001	95,086,000
	227	B-18-DP-45-0001	157,590,000
	228	B-19-DT-45-0001	4,598,000
	229	B-19-DV-45-0001	47,775,000
	230	B-19-DV-45-0002	24,300,000
<b>73</b>		<b>South Dakota Housing Development Authority</b>	
	231	B-08-DF-46-0001	1,987,271
<b>74</b>		<b>Springfield, MA</b>	
	232	B-13-MS-25-0001	21,896,000
	233	B-13-MS-25-0002	17,056,880
<b>75</b>		<b>St. Clair County, IL</b>	
	234	B-23-UN-17-0001*	30,027,000
<b>76</b>		<b>St. Louis County, MO</b>	
	235	B-23-UN-29-0002*	56,425,000
<b>77</b>		<b>St. Louis, MO</b>	
	236	B-23-MN-29-0001*	25,834,000
<b>78</b>		<b>St. Tammany Parish</b>	
	237	B-13-US-22-0002	10,914,916
<b>79</b>		<b>Tennessee</b>	

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	238	B-08-DI-47-0001	90,773,713
	239	B-10-DF-47-0001	30,047,713
	240	B-13-DS-47-0001	13,810,000
	241	B-13-DS-47-0002	44,502,374
	242	B-21-DF-47-0001*	25,403,000
	243	B-21-DZ-47-0001	42,740,000
	244	B-22-DF-47-0001*	16,602,000
<b>80</b>		<b>Texas – GLO</b>	
	245	B-06-DG-48-0001	74,522,569
	246	B-06-DG-48-0002	428,665,571
	247	B-08-DI-48-0001	3,113,472,856
	248	B-12-DT-48-0001	31,319,686
	249	B-13-DS-48-0001	5,033,377
	250	B-16-DH-48-0001	74,568,000
	251	B-16-DL-48-0001	238,895,000
	252	B-17-DL-48-0002	57,800,000
	253	B-17-DM-48-0001	5,024,215,000
	254	B-18-DP-48-0001	652,175,000
	255	B-18-DP-48-0002	4,297,189,000
	256	B-19-DF-48-0001	227,510,000
	257	B-19-DT-48-0001*	4,652,000
	258	B-19-DV-48-0001	46,400,000
	259	B-19-DV-48-0002	26,513,000
	260	B-21-DF-48-0001*	26,387,000
	261	B-22-DF-48-0001*	17,245,000
<b>81</b>		<b>Town of Union, NY</b>	
	262	B-12-MT-36-0001	10,137,818
<b>82</b>		<b>Tuscaloosa, AL</b>	
	263	B-12-MT-01-0002	16,634,702
	264	B-13-MS-01-0002	43,932,000
<b>83</b>		<b>Vermont</b>	
	265	B-12-DT-50-0001	21,660,211
	266	B-13-DS-50-0001	17,932,000
<b>84</b>		<b>Virgin Islands</b>	
	267	B-17-DM-78-0001	242,684,000
	268	B-18-DE-78-0001	67,653,000
	269	B-18-DP-78-0001	779,217,000
	270	B-18-DP-78-0002	774,188,000
	271	B-19-DP-78-0001	53,588,884
<b>85</b>		<b>Virginia</b>	

Grantee count	Grant count	Grantee and grant(s) number	Grant amount
	272	B-05-DJ-51-0001	5,237,572
	273	B-13-DS-51-0001	120,549,000
<b>86</b>		<b>Volusia County, FL</b>	
	274	B-23-UN-12-0005*	328,910,000
<b>87</b>		<b>Warwick, RI</b>	
	275	B-10-MF-44-0002	2,787,697
<b>88</b>		<b>Washington</b>	
	276	B-21-DF-53-0001	18,641,000
	277	B-22-DF-53-0001*	12,182,000
<b>89</b>		<b>West Virginia</b>	
	278	B-05-DJ-54-0001	2,041,256
	279	B-08-DF-54-0001	3,127,935
	280	B-16-DL-54-0001	149,875,000
	281	B-18-DP-54-0001	106,494,000
<b>90</b>		<b>Wisconsin</b>	
	282	B-08-DF-55-0001	24,006,242
	283	B-08-DI-55-0001	114,619,036
	284	B-19-DT-55-0001*	980,000
	285	B-19-DV-55-0001	15,355,000
		<b>Total</b>	<b>97,659,391,162<sup>37</sup></b>

\* We included these grants in our review because the DRGR system contained them in its data. However, these grants had future grant dates in the DRGR system indicating CPD had not awarded the grants as of July 5, 2023.

<sup>37</sup> Individual amounts in table add to \$2 more than the total due to rounding differences.

## Appendix C – Public Laws and Appropriation Amounts

Count	Public law	Appropriation
<b>World Trade Center</b>		
1	PL 107-73	\$700,000,000
2	PL 107-117	2,000,000,000
3	PL 107-206	783,000,000
<b>Multiple disasters 2003-04</b>		
4	PL 108-324	150,000,000
<b>Hurricanes Katrina, Rita, and Wilma</b>		
5	PL 109-148	11,500,000,000
6	PL 109-234	5,200,000,000
7	PL 110-116	3,000,000,000
<b>Multiple disasters, 2008</b>		
8	PL 110-252	300,000,000
9	PL 110-329	6,500,000,000
10	PL 110-161 <sup>38</sup>	(377,139,920)
<b>Severe storms and flooding 2010</b>		
11	PL 111-212	100,000,000
<b>Multiple disasters 2011</b>		
12	PL 112-55	400,000,000
<b>Hurricane Sandy and other disasters 2011-2013</b>		
13	PL 113-2	15,200,000,000 <sup>39</sup>
<b>Hurricanes Joaquin, Patricia, and other floods, 2015</b>		
14	PL 114-113	300,000,000
<b>Louisiana floods and other 2016 events</b>		
15	PL 114-223	500,000,000
16	PL 114-254	1,808,976,000
<b>2017 events</b>		
17	PL 115-31	400,000,000
18	PL 115-56	7,400,000,000
19	PL 115-123	28,000,000,000
20	PL 116-20	431,000,000
<b>2018-2019 events</b>		
21	PL 115-254	1,680,000,000
	PL 116-20 <sup>40</sup>	2,000,000,000

<sup>38</sup> Congress enacted an across-the-board rescission for fiscal year 2008 that reduced the disaster recovery allocation by more than \$377 million.

<sup>39</sup> Congress appropriated \$16 billion but reduced the amount to \$15.2 billion due to sequestration in accordance with the Balanced Budget and Emergency Deficit Control Act.

<sup>40</sup> Some public laws contained appropriations for more than one disaster. Therefore, we listed them each time Congress appropriated funds but only counted them once.

Count	Public law	Appropriation
<b>2020-2021 events</b>		
22	PL 117-43	5,000,000,000
23	PL 117-180	2,000,000,000
24	PL 117-328	3,000,000,000
	<b>Total</b>	<b>97,975,836,080</b>

## Appendix D – Federal Register Notices and Allocation Amounts

Count	FR notice number	Allocation	Set aside
<b>World Trade Center</b>			
1	67 FR 4164	\$700,000,000	
2	67 FR 12042	1,999,000,000	\$1,000,000
3	68 FR 26640	783,000,000	
<b>Multiple disasters 2003-2004</b>			
4	69 FR 72100	150,000,000	
<b>Hurricanes Katrina, Rita, &amp; Wilma 2005</b>			
5	71 FR 7666	11,500,000,000	
6	71 FR 63337	5,173,000,000	27,000,000
7	72 FR 70472	3,000,000,000	
<b>Multiple disasters 2008</b>			
8	73 FR 52870	100,000,000	
9	73 FR 77818	200,000,000	
10	74 FR 7244	2,145,000,000	6,500,000
11	74 FR 41146	3,971,360,080	
<b>Severe storms and flooding 2010</b>			
12	75 FR 69097	50,000,000	
13	76 FR 20998	50,000,000	
<b>Multiple disasters 2011</b>			
14	77 FR 22583	400,000,000	
<b>Hurricane Sandy and other disasters</b>			
15	78 FR 14329	5,400,000,000	
16	78 FR 23578		19,000,000 <sup>41</sup>
17	78 FR 32262	514,012,000	
18	78 FR 69104	5,109,000,000	
19	78 FR 76154	128,500,000	
20	79 FR 31964	436,600,000	
21	79 FR 62182	2,504,017,000	
22	80 FR 1039	89,763,000	
23	81 FR 36557	999,108,000	
<b>Hurricanes Joaquin, Patricia, and other floods 2015</b>			
24	81 FR 39687	299,000,000	1,000,000
25	82 FR 36812	101,447,000	
26	84 FR 45838	284,541,052	
<b>Louisiana floods and other 2016 events</b>			
27	81 FR 83254	500,000,000	
28	82 FR 5591	1,805,976,000	3,000,000

<sup>41</sup> Congress made a total of \$20 million available to CPD and the HUD OIG, but it reduced the amount to \$19 million due to sequestration in accordance with the Balanced Budget and Emergency Deficit Control Act.

Count	FR notice number	Allocation	Set aside
	82 FR 36812 <sup>42</sup>	240,753,000	
	84 FR 45838 <sup>43</sup>	1,827,586,335	
<b>2017 events</b>			
29	82 FR 61320	57,800,000	
30	83 FR 5844	7,390,000,000	10,000,000
31	83 FR 40314	10,030,484,000	35,000,000
	84 FR 45838 <sup>44</sup>	4,762,916,613	
32	84 FR 47528	774,188,000	
33	85 FR 4676	8,285,284,000	
34	85 FR 4681	431,000,000	
35	86 FR 32681	2,000,000,000	
<b>2018-2019 events</b>			
	85 FR 4681 <sup>45</sup>	1,677,500,000	2,500,000
	85 FR 4681 <sup>46</sup>	1,216,134,000	5,000,000
36	86 FR 569	34,098,000	
37	86 FR 561	186,781,000	
	85 FR 4681 <sup>47</sup>	506,794,000	
	86 FR 569 <sup>48</sup>	51,193,000	
<b>2020 – 2021 events</b>			
38	87 FR 6364	2,051,217,000	12,500,000
39	87 FR 31636	722,688,000	
	87 FR 31636 <sup>49</sup>	2,213,595,000	
40	88 FR 3198	1,446,629,000	
<b>2021-2022 events</b>			
41	88 FR 32046	3,391,220,000	20,000,000 <sup>50</sup>
<b>Subtotals</b>		97,691,185,080	142,500,000
<b>Total allocation and set aside</b>			<b>97,833,685,080</b>

<sup>42</sup> Some FR notices contained allocations for more than one public law appropriation. Therefore, we listed them each time they announced fund allocations but only counted them once.

<sup>43</sup> Ibid.

<sup>44</sup> Ibid.

<sup>45</sup> Ibid.

<sup>46</sup> Ibid.

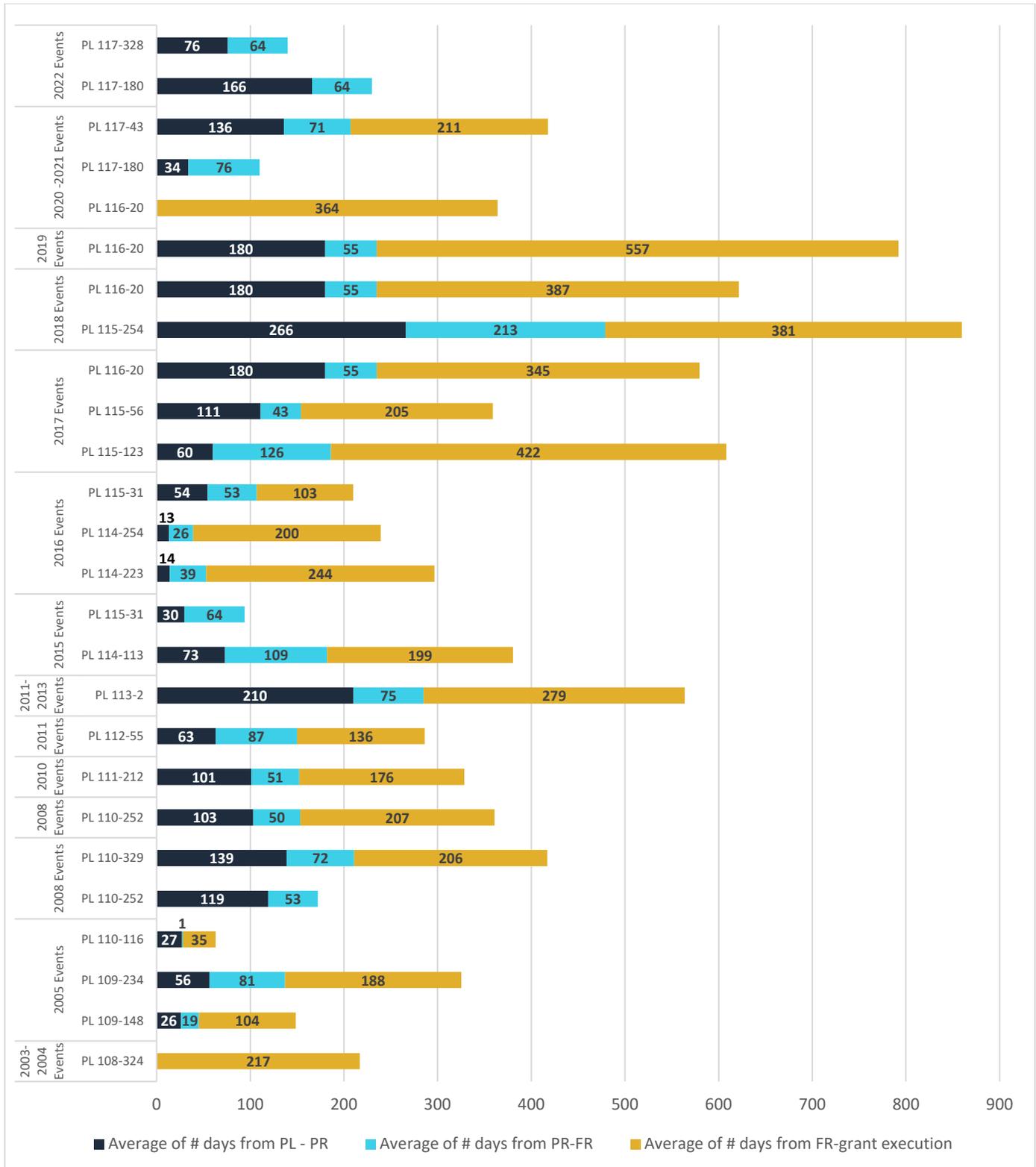
<sup>47</sup> Ibid.

<sup>48</sup> Ibid.

<sup>49</sup> Ibid.

<sup>50</sup> Congress appropriated \$20 million to CPD and HUD OIG in PL 117-348. However, CPD has not included or addressed these funds in a FR notice.

## APPENDIX E – MEASUREMENT POINTS FOR 2003-2022 FUNDING



Source for Appendix E: OIG analysis of grant execution dates.

### **Appendix E legend:**

1. We excluded timing results for World Trade Center Disaster funds (PL 107-73, PL 107-117, and PL 107-206.) HUD followed different process funding flows for World Trade Center appropriations, which resulted in negative day amounts for certain steps in the process.
2. HUD did not issue a press release for all the PL 108-324 funds. In addition, it did not issue press releases for some allocations for the following four public laws: PL 115-31, PL 116-20, PL 117-43, and PL 117-328.
3. The lack of a gold bar section for PL 115-31 in this chart represents funds awarded to prior-year funding and resulted in grant amendments rather than grant executions. We did not measure grant amendment dates.
4. Competitive grants and mitigation grants are not included in this chart.
5. Duplicate public laws represent laws that covered multiple disaster years.
6. PL 116-20 provided funding for multiple disasters from 2017 to 2021. The funds that covered 2020 and 2021 disasters went to one grantee and were allocated at the same time as prior disasters. For this grant, HUD did not issue a press release.
7. As of July 5, 2023, CPD had not executed all grants for PL 117-43. Further, it had not issued press releases for all funds for PL 117-43, had not issued press releases and a FR notice for all funds for PL 117-328, and had not executed any grants for PL 117-180 and PL 117-328.

## APPENDIX F – CRITERIA

### ***Public Law 107-38, 2001 Emergency Supplemental Appropriations Act for Recovery from and Response to Terrorist Attacks on the United States, Dated September 18, 2001***

For emergency expenses to respond to the terrorist attacks on the United States that occurred on September 11, 2001, to provide assistance to the victims of the attacks, and to deal with other consequences of the attacks, \$40,000,000,000 to remain available until expended, including for the costs of: (1) providing Federal, State, and local preparedness for mitigating and responding to the attacks; (2) providing support to counter, investigate, or prosecute domestic or international terrorism; (3) providing increased transportation security; (4) repairing public facilities and transportation systems damaged by the attacks; and (5) supporting national security: *Provided*, That these funds may be transferred to any authorized Federal Government activity to meet the purposes of this Act: *Provided further*, That the Congress designates the entire amount as an emergency requirement pursuant to section 251(b)(2)(A) of the Balanced Budget and Emergency Deficit Control Act of 1985: *Provided further*, That \$40,000,000,000 shall be available only to the extent that an official budget request, that includes designation of the \$40,000,000,000 as an emergency requirements as defined in the Balanced Budget and Emergency Deficit Control Act of 1985, is transmitted by the President to the congress: *Provided further*, That the President shall consult with the chairmen and ranking minority members of the Committees on Appropriations prior to the transfer of these funds: *Provided further*, That of the \$40,000,000,000 made available herein, \$10,000,000,000 shall not be available for transfer to any Department or Agency until 15 days after the Director of the Office of Management and Budget has submitted to the House and Senate Committees on Appropriations a proposed allocation and plan for use of the funds for that Department or Agency; \$20,000,000,000 may be obligated only when enacted in a subsequent emergency appropriations bill, in response to the terrorist acts on September 11, 2001.

### ***Public Law 107-73, Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 2002, Dated November 26, 2001***

Section 434. The amounts subject to the fifth proviso under the heading, “Emergency Response Fund”, in Public Law 107–38, which are available for transfer to the Department of Housing and Urban Development 15 days after the Director of the Office of Management and Budget has submitted to the House and Senate Committees on Appropriations a proposed allocation and plan for use of the funds for the Department, may be used for purposes of “Community Development Block Grants”, as authorized by title I of the Housing and Community Development Act of 1974, as amended: *Provided*, That such funds may be awarded to the State of New York for assistance for properties and businesses damaged by, and for economic revitalization related to, the September 11, 2001 terrorist attacks on New York City, for the affected area of New York City, and for reimbursement to the State and City of New York for expenditures incurred from the regular Community Development Block Grant formula allocation used to achieve these same purposes... *Provided further*, That the Secretary shall notify the Committees on Appropriations on the proposed allocation of any funds and any related waivers pursuant to this section no later than 5 days before such allocation.

### ***Public Law, 107-117, Department of Defense and Emergency Supplemental Appropriations for Recovery from and Response to Terrorist Attacks on the United States Act, 2002, Dated January 10, 2002***

For emergency expenses to respond to the September 11, 2001, terrorist attacks on the United States, for “Community Development Fund”, \$2,000,000,000, to remain available until expended, to be obligated from amounts made available in Public Law 107–38.

***Public Law 107-206, 2002 Supplemental Appropriations Act for Further Recovery From and Response to Terrorist Attacks on the United States, Dated August 2, 2002***

For an additional amount for the “Community development fund” for emergency expenses to respond to the September 11, 2001, terrorist attacks on the United States, \$783,000,000, to remain available until expended.

***Public Law 108-324, Military Construction Appropriations and Emergency Hurricane Supplemental Appropriations Act, 2005, Dated October 13, 2004***

For an additional amount for “Community development fund”, for activities authorized under title I of the Housing and Community Development Act of 1974, for use only for disaster relief, long-term recovery, and mitigation in communities affected by disasters designated by the President between August 31, 2003 and October 1, 2004, except those activities reimbursable by the Federal Emergency Management Agency or available through the Small Business Administration, and for reimbursement for expenditures incurred from the regular Community Development Block Grant formula allocation used to achieve these same purposes, \$150,000,000, to remain available until September 30, 2007.

***Public Law 109-148, Department of Defense, Emergency Supplemental Appropriations to Address Hurricanes in the Gulf of Mexico, and Pandemic Influenza Act, 2006, Dated December 30, 2005***

For an additional amount for the “Community development fund”, for necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure in the most impacted and distressed areas related to the consequences of hurricanes in the Gulf of Mexico in 2005 in States for which the President declared a major disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. [United States Code] 5121 et seq.) in conjunction with Hurricane Katrina, Rita, or Wilma, \$11,500,000,000, to remain available until expended, for activities authorized under title I of the Housing and Community Development Act of 1974 (Public Law 93–383)... ***Provided further***, That the Secretary shall notify the Committees on Appropriations on the proposed allocation of any funds and any related waivers pursuant to this section no later than 5 days before such allocation.

***Public Law 109-234, Emergency Supplemental Appropriations Act for Defense, The Global War on Terror, and Hurricane Recovery, 2006, Dated June 15, 2006***

For an additional amount for the “Community development fund”, for necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure in the most impacted and distressed areas related to the consequences of Hurricanes Katrina, Rita, or Wilma in States for which the President declared a major disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), \$5,200,000,000, to remain available until expended, for activities authorized under title I of the Housing and Community Development Act of 1974 (Public Law 93–383) ... ***Provided further***, That the Secretary shall notify the Committees on Appropriations on any proposed allocation of any funds and any related waivers made pursuant to these provisions under this heading no later than 5 days before such waiver is made.

***Public Law 110-116, Department of Defense Appropriations Act, 2008, Dated November 13, 2007***

Section 159. (a) Notwithstanding any other provision of this joint resolution, and in addition to amounts otherwise made available by this joint resolution, there is appropriated \$3,000,000,000 for ‘Department of Housing and Urban Development—Community Planning and Development—Community Development Fund’, to remain available until expended, to enable the Secretary of Housing and Urban Development to make a grant or grants to the State of Louisiana solely for the purpose of covering costs associated with

otherwise uncompensated but eligible claims that were filed on or before July 31, 2007, under the Road Home program administered by the State in accordance with plans approved by the Secretary.

***Public Law 110-252, Supplemental Appropriations Act, 2008, Dated June 30, 2008***

For an additional amount for “Community Development Fund”, for necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure in areas covered by a declaration of major disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) as a result of recent natural disasters, \$300,000,000, to remain available until expended, for activities authorized under title I of the Housing and Community Development Act of 1974 (Public Law 93–383) ... ***Provided further***, That the Secretary shall notify the Committees on Appropriations on the proposed allocation of any funds and any related waivers pursuant to these provision under this heading no later than 5 days before such waiver is made.

***Public Law 110-329, Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009, Dated September 30, 2008***

For an additional amount for the “Community Development Fund”, for necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure, housing, and economic revitalization in areas affected by hurricanes, floods, and other natural disasters occurring during 2008 for which the President declared a major disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974, \$6,500,000,000, to remain available until expended, for activities authorized under title I of the Housing and Community Development Act of 1974 (Public Law 93–383)... ***Provided further***, That the Secretary shall allocate to the states not less than 33 percent of the funding provided under this heading within 60 days after the enactment of this Act based on the best estimates available of relative damage and anticipated assistance from other Federal sources)... ***Provided further***, That the Secretary shall notify the Committees on Appropriations on the proposed allocation of any funds and any related waivers pursuant to these provision under this heading no later than 5 days before such allocation or waiver is made.

***Public Law 110-161, Consolidated Appropriations Act, 2007, Dated December 26, 2007***

Section 699P. (a) BILL-WIDE RESCISSIONS. – There is hereby rescinded an amount equal to .81 percent of the budget authority provided for fiscal year 2008 for any discretionary account in this Act.

***Public Law 111-212, Supplemental Appropriations Act, 2010, Dated July 29, 2010***

For an additional amount for the “Community Development Fund”, for necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure, housing, and economic revitalization in areas affected by severe storms and flooding from March 2010 through May 2010 for which the President declared a major disaster covering an entire State or States with more than 20 counties declared major disasters under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974, \$100,000,000, to remain available until expended, for activities authorized under title I of the Housing and Community Development Act of 1974 (Public Law 93–383)... ***Provided further***, That the Secretary shall obligate to a State or subdivision thereof not less than 50 percent of the funding provided under this heading within 90 days after the enactment of this Act.

***Public Law 112-55, Consolidated and Further Continuing Appropriations Act, 2012, Dated November 18, 2011***

Section 239. Of the funds made available for the ‘Department of Housing and Urban Development, Community Planning and Development, Community Development Fund’, up to \$300,000,000, to remain

available until expended, shall be for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (Public Law 93–383) related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) in 2011... *Provided*, That funds shall be awarded directly to the State or unit of general local government at the discretion of the Secretary,... *Provided further*, That an additional 100,000,000 shall be available for the same purposes and terms described in this section and shall be designated by Congress as being for disaster relief pursuant to section 251(b)(2)(D) of the Balanced Budget and Emergency Deficit Control Act of 1985.

***Public Law 113-2, Disaster Relief Appropriations, Dated January 29, 2013***

Title IX General Provisions Section 904. (c) Funds for grants provided by this division shall be expended by the grantees within the 24-month period following the agency’s obligation of funds for the grant, unless, in accordance with guidance to be issued by the Director of OMB, the Director waives this requirement for a particular grant program and submits a written justification for such waiver to the Committees on Appropriations of the House of Representatives and the Senate. In the case of such grants, the agency shall include a term in the grant that requires the grantee to return to the agency any funds not expended within the 24-month period.

Title X Additional Disaster Assistance Chapter 9: ...For an additional amount for “Community Development Fund”, \$16,000,000,000, to remain available until September 30, 2017, for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) due to Hurricane Sandy and other eligible events in calendar years 2011, 2012, and 2013, for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.)... *Provided further*, That the Secretary shall allocate to grantees not less than 33 percent of the funds provided under this heading within 60 days after the enactment of this division based on the best available data.

***Public Law 114-113, Consolidated Appropriations Act, 2016, Dated December 18, 2015***

Section 420. For an additional amount for “Community Planning and Development, Community Development Fund”, \$300,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared in 2015 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) related to the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.

***Public Law 114-223, Continuing Appropriations and Military Construction, Veterans Affairs, and Related Agencies Appropriations Act, 2017, and Zika Response and Preparedness Act, Dated September 29, 2016***

Section 145. (a) In addition to the amount otherwise provided by section 101 for the “Community Planning and Development, Community Development Fund”, there is appropriated \$500,000,000 for an additional amount for fiscal year 2016, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, and

economic revitalization in the most impacted and distressed areas resulting from a major disaster declared in 2016, and which the disaster occurred prior to the date of enactment of this Act, pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.)... *Provided*, That funds shall be awarded directly to the State or unit of general local government at the discretion of the Secretary.

***Public Law 114-254, Further Continuing and Security Assistance Appropriations Act, 2017, Dated December 10, 2016***

Section 192. (a) Notwithstanding any other provision of this Act, and in addition to the amount otherwise provided by section 101 for ‘Department of Housing and Urban Development—Community Planning and Development—Community Development Fund’, there is appropriated \$1,808,976,000 for an additional amount for fiscal year 2017, to remain available until expended, that is identical to the additional appropriation for fiscal year 2016 in section 145(a) of this Act (except that ‘enactment of this Act’ shall be treated as referring to enactment of this section, and except for the last proviso under such subsection), and with respect to which the same authority and conditions shall be in effect: *Provided*, That of the amount made available by this subsection, \$1,416,000,000 is designated by the Congress as being for disaster relief pursuant to section 251(b)(2)(D) of the Balanced Budget and Emergency Deficit Control Act of 1985, and \$392,976,000 is designated by the Congress as an emergency requirement pursuant to section 251(b)(2)(A)(i) of the Balanced Budget and Emergency Deficit Control Act of 1985.

(b) Of the amounts made available by subsection (a) and designated by the Congress as an emergency requirement pursuant to section 251(b)(2)(A)(i) of the Balanced Budget and Emergency Deficit Control Act of 1985, up to \$3,000,000 may be transferred, in aggregate, to ‘Department of Housing and Urban Development—Program Office Salaries and Expenses—Community Planning and Development’ for necessary costs, including information technology costs, of administering and overseeing the obligation and expenditure of amounts in section 145 and all amounts in this section.

***Public Law, 115-31, Consolidated Appropriations Act, 2017, Dated May 5, 2017***

Section 421. For an additional amount for “Department of Housing and Urban Development, Community Planning and Development, Community Development Fund”, \$400,000,000, to remain available until expended, which amounts shall be allocated and used under the same authority and conditions as-

(1) the additional appropriations for fiscal year 2016 in section 145(a) of division C of Public Law 114–223 and for fiscal year 2017 in section 192(a) of division C of Public Law 114–223 (as added by section 101(3) of division A of Public Law 114-254) (except for the last proviso under such section 145(a) and the proviso under such section 192);

(2) the additional appropriation for fiscal year 2016 in section 420 of title IV of division L of Public Law 114-113 (except for the last two provisos under such section); and

(3) in section 145(a) of division C of Public Law 114–223 (except for the last proviso under such section 145(a)), for additional major disasters declared in calendar year 2017 or later until such funds are fully allocated:

*Provided*, That amounts authorized for use under section 192(b) of division C of Public Law 114-223 (as added by section 101(3) of division A of Public Law 114-254) may be used for necessary costs, including information technology costs, of administering and overseeing the obligation and expenditure of amounts made available under this section: *Provided further*, That amounts made available by this section shall

be designated by the Congress as an emergency requirement pursuant to section 251(b)(2)(A)(i) of the Balanced Budget and Emergency Deficit Control Act of 1985.

***Public Law 115-56, Continuing Appropriations Act, 2018 and Supplemental Appropriations for Disaster Relief Requirements Act, 2017, Dated September 8, 2017***

For an additional amount for “Community Development Fund”, \$7,400,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared in 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.): ***Provided***, That funds shall be awarded directly to the State or unit of general local government at the discretion of the Secretary

***Public Law 115-123, Bipartisan Budget Act of 2018, Dated February 9, 2018***

For an additional amount for “Community Development Fund”, \$28,000,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas resulting from a major declared disaster that occurred in 2017 (except as otherwise provided under this heading) pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.): ***Provided***, That funds shall be awarded directly to the State, unit of general local government, or Indian tribe (as such term is defined in section 102 of the Housing and Community Development Act of 1974) at the discretion of the Secretary: ***Provided further***, That of the amounts made available under this heading, up to \$16,000,000,000 shall be allocated to meet unmet needs for grantees that have received or will receive allocations under this heading for major declared disasters that occurred in 2017 or under the same heading of Division B of Public Law 115–56, except that, of the amounts made available under this proviso, no less than \$11,000,000,000 shall be allocated to the States and units of local government affected by Hurricane Maria, and of such amounts allocated to such grantees affected by Hurricane Maria, \$2,000,000,000 shall be used to provide enhanced or improved electrical power systems... ***Provided further***, That of the amounts made available under this heading, no less than \$12,000,000,000 shall be allocated for mitigation activities to all grantees of funding provided under this heading, section 420 of division L of Public Law 114–113, section 145 of division C of Public Law 114–223, section 192 of division C of Public Law 114–223 (as added by section 101(3) of division A of Public Law 114–254), section 421 of division K of Public Law 115–31, and the same heading in division B of Public Law 115–56, and that such mitigation activities shall be subject to the same terms and conditions under this subdivision, as determined by the Secretary... ***Provided further***, That of the amounts made available under the second and fourth provisos of this heading, the Secretary shall allocate to all such grantees an aggregate amount not less than 33 percent of each such amounts of funds provided under this heading within 60 days after the enactment of this subdivision based on the best available data (especially with respect to data for all such grantees affected by Hurricanes Harvey, Irma, and Maria), and shall allocate no less than 100 percent of the funds provided under this heading by no later than December 1, 2018.

***Public Law 115-254, Division I - Supplemental Appropriations for Disaster Relief, 2018, Dated October 5, 2018***

For an additional amount for “Community Development Fund”, \$1,680,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community

Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas resulting from a major declared disaster that occurred in 2018 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.).

***Public Law 116-20, Additional Supplemental Appropriations for Disaster Relief Act, 2019, Dated June 6, 2019***

For an additional amount for “Community Development Fund”, \$2,431,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas resulting from a major disaster that occurred in 2018 or 2019 (except as otherwise provided under this heading) pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.): *Provided*, That funds shall be awarded directly to the State, unit of general local government, or Indian tribe (as such term is defined in section 102 of the Housing and Community Development Act of 1974) at the discretion of the Secretary:... *Provided further*, That of the amounts made available under this heading \$431,000,000 shall be allocated to meet unmet infrastructure needs for grantees that received allocations for disasters that occurred in 2017 under this heading of division B of Public Law 115–56 and title XI of subdivision 1 of division B of Public Law 115–123, of which \$331,442,114 shall be allocated to those grantees affected by Hurricane Maria... *Provided further*, That any funds made available under this heading and under the same heading in Public Law 115–254 that remain available, after the funds under such headings have been allocated for necessary expenses for activities authorized under such headings, shall be allocated to grantees, for mitigation activities in the most impacted and distressed areas resulting from a major disaster that occurred in 2018: *Provided further*, That of the amounts made available under the text preceding the first proviso under this heading and under the same heading in Public Law 115–254, the Secretary shall allocate to all such grantees an aggregate amount not less than 33 percent of the sum of such amounts of funds within 120 days after the enactment of this Act based on the best available data, and shall allocate no less than 100 percent of such funds by no later than 180 days after the enactment of this Act.

Section 1102. Of all amounts made available for mitigation activities under the heading “Department of Housing and Urban Development—Community Development Fund” in Public Law 115–123, the Secretary shall publish in the Federal Register the allocations to all eligible grantees, and the necessary administrative requirements applicable to such allocations within 90 days after enactment of this Act.

***Public Law 117-43, Disaster Relief Supplemental Appropriations Act, 2022, Dated September 30, 2021***

For an additional amount for “Community Development Fund”, \$5,000,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation, in the most impacted and distressed areas resulting from a major disaster that occurred in 2020 or 2021 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.): *Provided*, That funds shall be awarded directly to the State, unit of general local government or Indian tribe (as such term is defined in section 102 of the Housing and Community Development Act of 1974 (42 U.S.C. 5302)) at the discretion of the Secretary ... *Provided further*, That of the amounts made available under this heading in the Act, no less than \$1,610,000,000 shall be allocated for major declared disasters that occurred in 2020 within 30 days of the date of enactment of this Act... *Provided further*, That of the amounts made

available under this heading in this Act, up to \$7,000,000 shall be made available for capacity building and technical assistance, including assistance on contracting and procurement, to support States, units of general local government, Indian tribes, and subrecipients that receive allocations for disaster recovery pursuant to the authority under this heading in this Act and allocations for disaster recovery in any prior or future Acts: *Provided further*, That of the amounts made available under this heading in this Act, up to \$5,500,000 shall be transferred to “Department of Housing and Urban Development - Program Office Salaries and Expenses - Community Planning and Development” for necessary costs including information technology costs, of administering and overseeing the obligation and expenditure of amounts made available under the heading “Community Development Fund” in this Act or any prior or future Act that makes amounts available for purposes related to major disasters under such heading.

***Public Law 117-180, Continuing Appropriations and Ukraine Supplemental Appropriations Act, 2023, Dated September 20, 2022***

Section 155. In addition to amounts otherwise provided by section 101, for “Department of Housing and Urban Development – Community Planning and Development – Community Development Fund”, there is appropriated \$2,000,000,000 for an additional amount for fiscal year 2023, to remain available until expended, for the same purposes and under the same terms and conditions as funds appropriated under such heading in title VIII of the Disaster Relief Supplemental Appropriations Act, 2022 (division B of Public Law 117–43), except that such amounts shall be for major disasters that occurred in 2021 or 2022 and the fourth, twentieth, and twenty- first provisos under such heading in such Act shall not apply.

***Public Law 117-328, Consolidated Appropriations Act, 2023, Dated December 29, 2022***

For an additional amount for “Community Development Fund”, \$3,000,000,000 to remain available until expended, for the same purposes and under the same terms and conditions as funds appropriated under such heading in title VIII of the Disaster Relief Supplemental Appropriations Act, 2022 (division B of Public Law 117–43), except that such amounts shall be for major disasters that occurred in 2022 or later until such funds are fully allocated and the fourth, twentieth, and twenty- first provisos under such heading in such Act shall not apply... *Provided further*, That of the amounts made available under this heading in this Act, up to \$10,000,000 shall be made available for capacity building and technical assistance, including assistance on contracting and procurement to support States, units of general local government, or Indian tribes, that receive allocations related to major disasters under this heading in this, prior, or future Acts. *Provided further*, That of the amounts made available under this heading in this Act, up to \$5,000,000 shall be transferred to “Department of Housing and Urban Development—Program Office Salaries and Expenses—Community Planning and Development” for necessary costs, including information technology costs, of administering and overseeing the obligation and expenditure of amounts made available under this heading in this Act or any prior or future Act that makes amounts available for purposes related to major disasters under such heading... *Provided further*, That of the amounts made available under this heading in this Act, up to \$5,000,000 shall be transferred to “Department of Housing and Urban Development—Office of the Inspector General” for necessary costs of overseeing and auditing amounts made available under this heading in this Act or any prior or future Act that makes amounts available for purposes related to major disasters under such heading.