This FAQ will be updated periodically as questions are submitted. Please check the [*Regional Mitigation Program (COG MODs) website*](#) *for updates.*

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Questions and Answers

Beneficiaries

*Note - On October 21, 2022 the GLO posted updated LMI data which incorporates the Use of Standardized Area Median Income (AMI) Waiver. The updated data can be found on the [Regional Mitigation Program website](#).

The data includes information for the Block Groups, Places, and Counties in the state of Texas with the Use of Standardized AMI Waiver incorporated (85 FR 60821). The United States Department of Housing and Urban Development (HUD) allows the GLO, through the Notice, to make LMI determinations based on statewide median income instead of otherwise applicable AMI when local AMI is below statewide median income data.

B1 - Question: Will block-level population data be required to prove benefit to a significant portion (>50%) of a CGA? If not, what documentation will be required/acceptable to support the determination?

B1 - Answer: Block-level population data is one acceptable method to prove benefit to a significant portion of the identified census geographic area (CGA). Depending on the type of project, an applicant may consider alternate methods to document beneficiaries (e.g., number of connections based on service accounts provided by applicable service provider for the proposed project service area).

B2 - Question: Regarding page 9 of the (survey) manual, where instructions are provided for successfully completing a survey form: "Questionnaire Number: …The highest number assigned (which can be done randomly) must not exceed the total number of eligible Survey Questionnaires in a completed survey. All vacancies must be removed from the Survey List and cannot be included when assigning Questionnaire Numbers." I believe this statement applies exclusively to randomizing a 100% survey, but doesn't apply to surveys not being randomized, or randomized surveys generated from a meter list.

B2 - Answer: Surveys must be numbered to accurately verify beneficiaries, regardless of whether a random or 100% survey is completed. Applicants must number the surveys and then correlate such number to the location surveyed as referenced on the required survey map.

B3 - Question: There are two (2) MOE figures included in HUD's LMISD: "moe_lowmod_pct" and "moe_uclowmod_pct", which should we use?

B3 - Answer: Use "moe_lowmod_pct" for the GLO Random Number Generator. The uncapped count of low- and moderate-income persons is not used in the calculation of the percentage of low- and moderate-income persons, therefore should not be used on the Random Number Generator.

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B4 - Question: Page 10, mid-page and in bold requires that the survey list must "first be grouped by street name, then each group with the same street name must then be sorted by numerical order by street number." In support of that requirement, Page 16, Step 10, Number 4 states that surveys must be submitted in the same order as indicated on the survey list. Conversely, Page 16, Step 10, Number 5 states that vacant and NR surveys must be moved to the end of the survey documentation.

B4 - Answer: Instructions for completing a survey questionnaire in Step 4 indicate under "Questionnaire Number" that "all vacancies must be removed from the Survey List..." In the next step, Creating the Survey List, instructions are provided for all remaining surveys after removing the vacancies, "...grouped by street name...then each group with the same street name must then be sorted by numerical order by street number."

As indicated in Step 10, questionnaires for vacant and non-responsive households should be grouped at the end of the survey documentation separate from the Survey List completed in Step 5.

B5 - Question: The mapping of surveyed locations is a good idea. For citywide surveys, or larger target area surveys, there are often several hundreds of households to be served. Map legends for this volume of residential addresses are cumbersome to create. What mapping methods will the GLO accept to demonstrate surveyed locations? Would a .kmz file be acceptable? Would the GLO consider requiring a map with a legend for 100% surveys at or under 200 households? Could the legend be a supplemental page?

B5 - Answer: The applicant may use their choice of mapping tools; however, the application submission must be legible and reproducible without the need for specialized software. Maps produced by GIS or AutoCAD should be accompanied by a .pdf, .jpg. or similar format to facilitate review. A .kmz file alone is not acceptable.

A map indicating the location of the survey and corresponding survey number is required to verify beneficiaries in a target or service area. Based on prior submissions, this map requirement is the most efficient way of verifying beneficiaries when applicants choose to conduct surveys. It is acceptable to submit multiple maps in easily identifiable sections or sequentially numbered to facilitate production of legible quality maps that correspond to the survey numbers.

B6 - Question: Will income surveys that do not include race-ethnicity-gender data be considered Non-Responses/Non-LMI as outlined on page 5 of the methodology manual?

B6 - Answer: Item #4 on Page 6 of the GLO Survey Methodology document indicates that a survey form "which does not include the following...may be considered a non-response or a non-LMI household..." The bulleted list identifies the following:

- Location where the survey was conducted (city or county)
- Respondent's street address

- Date and time for each contact attempt, (minimum of two at varying times of day, as appropriate to improve likely response)
- The selected HUD Section 8 Income Limits inserted for family sizes 1 through 12
- Conflicting information between the identified family size and the family size income limit if it is higher than the correct income limit for that family size (e.g., a family with 3 persons is asked to compare the family's income to the income limit for a 4-person family)
- Number of males and females
- Race and ethnicity numbers
- Survey questionnaire numbers

This is an accurate statement. However, the methodology allows a secondary method to report gender, race, and ethnicity when the survey form itself is not complete.

A best practice in accurately completing surveys to support beneficiaries is to answer all questions on the survey form itself to the greatest extent feasible. In the event that a survey taker is not able to collect race, ethnicity, or gender responses during the respondent's interview, the DP-05 and Race and Ethnicity/Gender calculator form may be used to report the missing information.

If the survey form is missing data as outlined in the methodology and the packet does not include the corresponding DP-05 and Race/Ethnicity/Gender calculator, the survey form may be considered a non-response or non-LMI.

B7 - Question: Still see conflicting guidance about the use of DP05 for Race-Ethnicity-Gender calculation in the methodology manual.

B7 - Answer: The GLO's published Survey Methodology indicates that a survey form "which does not include the following...may be considered a non-response or a non-LMI household..." The bulleted list identifies the following:

- Location where the survey was conducted (city or county)
- Respondent's street address
- Date and time for each contact attempt, (minimum of two at varying times of day, as appropriate to improve likely response)
- The selected HUD Section 8 Income Limits inserted for family sizes 1 through 12
- Conflicting information between the identified family size and the family size income limit if it is higher than the correct income limit for that family size family with 3 persons is asked to compare the family's income to the income limit for a 4-person family)
- Number of males and females
- Race and ethnicity numbers
- Survey questionnaire numbers

Race and Ethnicity information must be provided to accurately document beneficiaries, but may be provided through multiple methods. The GLO has identified that it is a best practice

is to answer all questions on the survey form itself, to the greatest extent feasible to accurately document beneficiaries. If an applicant does not provide the requested race, ethnicity, and gender data via Table DP05, the information is required to be completed on each survey questionnaire. Applicants who provide race, ethnicity, and gender data via Table DP05 in lieu of providing this information on the survey questionnaire will not be penalized for doing so.

B8 - Question: When I add all block populations together within the Block Group, I only get a total population of less than 1,900. However, the LOWMODUNIV for the Block Group is almost 3,000. The numbers don't speak to each other. How can we demonstrate that we are benefiting a significant portion of the Block Group if the LOWMODUNIV is higher than Census Population Data? Note the high MOE.

B8 - **Answer:** Block level population data is only available for the decennial census. The LMISD provided by HUD is based on the 2011-2015 ACS. These numbers do not align since they are based on different data sets. An applicant may consider other options to determine if a project serves a significant portion of a census geographic area, including but not limited to the following:

- Block group population data for the 2011-2015 ACS to more closely align with the LMISD
- Projected number of utility service connections in the project area/total number of utility service connections in the census geographic area, if applicable
- Use a mapping tool to identify dwellings in the service area/total number of dwellings in the applicable census geographic area

As the application deadline approaches, if an applicant has continued concerns about determining a significant portion of the census geographic area to support the use of LMISD, the applicant should thoroughly document the method by which a determination of "significant" portion of a census geographic area was achieved and upload the supporting documentation as part of the Quickbase application for consideration. The approach should be based on a method that may be replicated for confirmation. You may also reach out to the GLO for assistance by emailing cdr.mitigation@recovery.texas.gov.

B9 - Question: (Regarding the) availability of LMI waivers for communities from (the) GLO under the Regional Mitigation Program. (H-GAC's) understanding was that new waivers were not available (for the H-GAC Method of Distribution).

B9 - **Answer:** Language from the CDBG-MIT Action Plan Amendment 1 states that "COGs may submit a waiver request with justification to lower the minimum LMI benefit requirement to the GLO…" (*Section 5.4.6.5.xiv*). In the case of H-GAC, an LMI waiver was submitted but was not granted for the development of the Method of Distribution. For allocation recipients seeking the upper quartile exception in each respective MOD, applicants to the Regional Mitigation Program should reference the "*FY 2021 Non-entitlement Upper Quartile Counties*" and "*FY 2021 Non-entitlement Upper Quartile*

Communities" lists found here: https://recovery.texas.gov/mitigation/programs/regional-mitigation/index.html.

B10 - Question: I have a question regarding the current census block group boundaries vs the LMISD spreadsheet. They don't match.

For example, census map for Sabine County has 3 block groups for 9501. LMISD only has 2. I checked the GLO GIS mapping system and the same thing happened. I can use the LMISD mapping for project location and LMI numbers, but the demographic info will have to come from census data and it won't match up. ACS is 2021 but I cannot choose year 2021 for census mapping, only 2020.

B10 - Answer: Given the issue with the 2020 ACS Block Groups not having the same delineations as the FY21 LMISD, we are going to have to revert our Demographic Data to 2019 ACS.

A further explanation is that that we are currently using the most recent ACS data available (from 2020) which is based on the new Census Block Group delineations from the 2020 Decennial Census. The FY2021 LMISD still relies on the old 2010 Census Block Group delineations. To ensure that the Block Groups are aligned, we will (like I stated above) compile into the Mitigation Viewer the 2019 ACS data which still relies on the old 2010 Census Block Group delineations.

For future inquiries regarding the Mitigation Viewer and technical GIS questions, please be sure to email the GIS Team at: cdr.gis@recovery.texas.gov. For inquiries tied to the Mitigation COG MOD Program in general or additional assistance on applications, please be sure to email the CDR Mitigation Team at: cdr.mitigation@recovery.texas.gov.

Updates to the Mitigation Viewer were made on August 16, 2022 to reflect 2019 5YR American Community Survey demographics data to align with FY2021 LMISD 2010 Census block groups. Found here: https://gis-glo-cdr.hub.arcgis.com/pages/cdbg-mitigation-viewer.

B11 - Question: A Question from the Fair Housing tab - "What are the identified protected classes, racially and ethnically concentrated areas, and concentrated areas of poverty that may be impacted by this project?" Where can we find the definition of "protected classes" in this context? There is no clarification in the app guide.

B11 - Answer: As defined by the Fair Housing Act the protected classes are the following:

Protected Classes	Source
Race	ACS 5-Year, 2019, Table: DP05, data.census.gov
National Origin	ACS 5-Year, 2019, Table: DP02, data.census.gov
Sex	ACS 5-Year, 2019, Table: DP05, data.census.gov
Familial Status	ACS 5-Year, 2019, Table: DP02, data.census.gov
Disability	ACS 5-Year, 2019, Table: DP02, data.census.gov
Color	No Data Available
Religion	No Data Available

Source: https://recovery.texas.gov/documents/action-plans/mitigation/mitigation-sap-amend-1-appendix-h.pdf

B12 - Question: How is LMI determined for individual projects (what geography should be used? In what format?)

B12 - Answer: As indicated on pages 49-55 of the Regional Mitigation Application Guide, located on the Texas Recovery Website:

"The method(s) used by the applicant to identify the beneficiaries of a project are based on the type of project proposed, and the persons that are projected to benefit from the proposed project.

Applicants must provide the total number of project beneficiaries identified through either CDBG-MIT surveys, LMISD, direct benefit, or limited clientele methods. If beneficiaries were identified by using a survey, as opposed to using LMISD, the applicant must provide an explanation why the survey was necessary."

B13 - Question: How are project areas determined (self-reported? Consistent measures?)?

B13 - Answer: Applicants should work with their project engineer to identify the service area for the proposed project. Supporting the determination with maps that include the project service area overlayed with census track and block group data.

B14 - Question: How are project beneficiaries determined (how direct does it have to be to count someone as a beneficiary?

B14 - Answer: The method(s) used by the applicant to identify the beneficiaries of a project are based on the type of project proposed, and the persons that are projected to benefit from the proposed project. The Regional Mitigation Application Guide has more information on identifying beneficiaries (pages 45-55).

B15 - Question: There is an alignment issue within the FY21 LMISD Data with State Median Income Waiver Applied excel document as posted on the Regional Mitigation Program website.

B15 - Answer: This issue has been rectified as of 11/22/2022. The rectified FY21 LMISD Data with State Median Income Waiver Applied excel document can be found on the Regional Mitigation Program website. Users may need to clear your cache and cookies before attempting to download the updated excel document.

B16 - Question: If a community has an allocation, but there is no possibility of them meeting the COG's 50% LMI threshold, will the application for their allocation be declined upon receipt? The community has a very low LMI of 20%, and their project is in one of the lower LMI areas of the City with hundreds of addresses. How will the GLO handle the application overall?

B16 - Answer: The application needs to meet the requirements set forth in the MOD for the GLO to consider it.

B17 - Question: Please see the clarification needed below from our Beneficiary Team Lead on surveys and LMISD combination. Is combining the two methods eligible for MIT MOD? Thank you for your review.

Page 50 of the app guide:
"The CDBG-MIT program will only allow the use of the Census-based information to qualify an activity and to document the activity beneficiaries under the following conditions:
1) The project will benefit all of the persons within a CGA or a significant number of the persons within a CGA. The CGA could be a county, place, census tract, block group, or logical record number.
2) If only Census-based information is used to document the LMI beneficiaries of an application project, the low- and moderate-income benefit percentage must be at least 51 percent (not 50.99 percent) for a single CGA, or for combinations of two or more CGAs.
3) The Census-based information may be used in combination with CDBG-MIT survey beneficiaries, income eligible beneficiaries, and condition-eligible beneficiaries to document the LMI beneficiaries of an application project. Again, the project must benefit at least 51 percent low- and moderate-income persons."

Page 51 of the app guide:
"Surveys may also be used to document the beneficiaries of a project not included in the census data used to document part of the service area."

B17 - Answer: No combination of surveys are allowable. Please see page 4 (Item 2.a) of the Regional Mitigation Program Survey Methodology. Page 4 of the Survey Methodology Section states, under the "Methods to Document Beneficiaries" section:

•   (2.a) "The combination of survey data and LMISD has been determined by HUD to not be methodologically sound and as such is not an acceptable method of documenting beneficiaries. In situations where the service area extends beyond the boundaries of a

census geographic area but does not benefit a significant portion of the area beyond the boundary of the census geographic area, a survey of the entire service area will be required to accurately reflect beneficiaries."

The link to the Regional Mitigation Program Survey Methodology is below: https://recovery.texas.gov/documents/2018-2019-floods/programs/infrastructure-competition/2022-survey-methodology.pdf

The Regional Mitigation Program Application Guide will be updated to match the Regional Mitigation Program Survey Methodology document. In the meantime, please refer to page 4 of the Regional Mitigation Program Survey Methodology document.

B18 - Question: The language regarding surveys in the Regional Mitigation Program Application Guide, regarding use of LMISD and surveys (page 50) does not match the guidance in the Regional Mitigation Program Survey Methodology (page 4).

Please clarify which guidance applies.

B18 - Answer: The Regional Mitigation Program Application Guide will be updated to match the Regional Mitigation Program Survey Methodology document. In the mean time, please refer to page 4 of the Regional Mitigation Program Survey Methodology document.

Page 4 of the Survey Methodology Section states "Methods to Document Beneficiaries" (Section 2.a). "The combination of survey data and LMISD has been determined by HUD to not be methodologically sound and as such is not an acceptable method of documenting beneficiaries. In situations where the service area extends beyond the boundaries of a census geographic area but does not benefit a significant portion of the area beyond the boundary of the census geographic area, a survey of the entire service area will be required to accurately reflect beneficiaries.".

B19 - Question: How do we determine if a project is considered LMI? We are assisting one of our stakeholders in prioritizing LMI.

B19 - Answer: Please review the Regional Mitigation Program Application Guide. Beginning on page 45 of the document, the section "Quickbase Application (National Objective) Tab," discusses the low-and moderate-income (LMI) National Objective and how projects can meet the LMI National Objective.

B20 – Question: We are wrapping up one of our project areas in the application portal, but we are having an issue with the demographics, which affects our application.
The city is one of our project areas. However, their demographic data differs from source to source:
  • ACS 5 year data indicates they have 654 residents

- The FY 21 LMISD Place data indicates the have 590 residents
  - *The LMISD Block group data includes a large area not served by this project, while the place data reflects the actual beneficiaries.*

The problem comes in when you compare either to the LMISD number of LMI beneficiaries

STUSAB	STATE	PLACE_NAME	QUALIFY_FOR_STATE_MEDIAN_INCOME_WAIVER	PLACE	lowmod_pop	lowmodu_pop	lowmod_pct_POP	MOE_
TX	48	Surfside Beach city	NO	71384	310	590	52.54%	

(310). The ACS number makes the LMI percentage 47.4% (not meeting the national objective threshold). The LMISD number makes it 52.54%, meeting the National Objective.

The LMI data would seem the better measure to use, since on both cases you're comparing the LMI number from that data source to the total population. However, the application requires the number of beneficiaries to match between the top of the tab and the ACS racial/ethnic breakdown numbers.

The difference between the two methods makes the difference between our HUD application meeting the 50%/51% threshold overall.

Additionally, another issue we are running into is that the application itself wants the total beneficiaries numbers used in the ACS section to match the total beneficiaries number at the top of that tab (Activities, National Objective) in the LMI section. It flags it when they don't.

B20 – Answer: HUD stipulates that the current LMISD, or an approved survey, be used to identify beneficiaries for all CDBG-MIT projects. The ACS 5-year data is used to calculate the Race/Ethnicity (RE) numbers for the project.

In order to identify the Race/Ethnicity numbers for your project, you have to use the DP05 Table (ACS 5-Year Data) in conjunction with the Race/Ethnicity Calculator located on the Recovery Website at the link below.

https://recovery.texas.gov/mitigation/programs/regional-mitigation/index.html

The calculator will extrapolate the RE numbers for the project based on the total beneficiary number, which would be the Low-Mod Universe number from the LMISD data (highlighted below).

The top portion of the calculator will be completed using the numbers from the DP05 Table. You will need to enter the total beneficiary number from the LMISD in the field at the

bottom of the form. When you enter the total beneficiary number the RE numbers for the project will calculate for you. These are the numbers you will enter into the applicable area in the application.

Duplication of Benefits

DOB1 - Question: Under the Duplication of Benefits section, in the "Other funding" sub header, there is the following question - "Has the applicant submitted a request to fund a part of or the whole project described in the application?" Can we get clarification on what this question is asking? Does "submitted a request" refer to GLO only or any agency?

DOB1 - **Answer:** The applicant should indicate if an application to fund a part of or the whole project has been submitted to the GLO or any other agency.

Mitigation Viewer

MV1 - Question: I am working on an application and came across the button to upload the "CDBG Mitigation Viewer Export". I checked the https://recovery.texas.gov/mitigation/programs/regional-mitigation/index.html page and do not see a supporting document labeled as such. Can you please elaborate on what this document is and provide a copy with instructions so we can complete our application?

MV1 - **Answer:** To upload the CDBG Mitigation Viewer Export you will need to use the CDBG Mitigation Viewer tool found here: https://gis-glo-cdr.hub.arcgis.com/pages/cdbg-mitigation-viewer.

Please refer to the User Guide provided under the Documentation section on detailed instructions for downloading/exporting your "Viewer Export".

Procurement

P1 - Question: I have a question about Procurement?

P1 - **Answer:** The GLO recognizes that Procurement can be quite a challenge for most. Thus, we have worked to put together some resources that provide guidance as you navigate the procurement waters.

As you may be aware, Subrecipients receiving CDBG-DR and CDBG-MIT funding are required to follow the procurement standards of 2 CFR 200.318 through 200.327 and the contract provisions within Appendix II to Part 200.

We encourage you to visit www.recovery.texas.gov to find the most up to date procurement information. The site provides guidance by HUD, GLO and even the entire 2CFR 200.318-200.327 chapters. There are also training videos and webinars available on subjects such as Methods of Procurement, Financial Management 101 and much more.

Here are just a few of the guidance documents you can find there:

- Procurement and Contracts Guidelines: https://recovery.texas.gov/grant-administration/procurement-contracts-guidelines/index.html

- Implementation Manual (Chapter 5): https://recovery.texas.gov/grant-administration/grant-implementation/implementation-manual/index.html

- Cost Price Analysis: https://www.hud.gov/program_offices/cpo/grantees/cstprice

- Request for Proposal: https://recovery.texas.gov/documents/grant-administration/procurement-contracts-guidelines/request-for-proposals-training.pdf

- GLO-CDR Procurement Checklist: https://recovery.texas.gov/documents/grant-administration/procurement-contracts-guidelines/procurement-checklist.pdf

- HUD Buying Rights (includes guidance for RFP of Professional Services): https://www.hudexchange.info/resource/5614/buying-right-cdbg-dr-and-procurement-a-guide-to-recovery/

You may also request additional procurement technical assistance by submitting a request to cdr.mitigation@recovery.texas.gov.

P2 - Question: Does the GLO have any requirements for contractors paid under the award?

P2 - Answer: The CDBG-MIT rules apply to any awards made at the local level. Funds must follow all CDBG-MIT rules. Please refer to project delivery and engineering fees can be found on page 60 of the Regional Mitigation Application Guide.

P3 - Question: Are there any GLO/CDBG-MIT restrictions on engineering firms who help with RFPs/etc. for local entities receiving allocations, from bidding on projects for that entity?

P3 - Answer: Yes. If a service provider assists with developing an RFP or RFQ, they are not eligible to compete for that procurement. Please refer to CFR 2 CFR 200.319(a) and (b).

P4 - Question: Is there a "buy domestic" preference on these MIT MOD contracts?

P4 - Answer: There will be a Domestic preference for procurements. All subrecipient contracts with construction firms must include the domestic preference provision as found in 2 CFR 200.322 (LINK) The language is below:

"As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award."

This is distinct from the Buy American rule which currently does not apply to CDBG Mitigation grants.

P5 - Question: Is the requirement to publish (an RFP/RFQ) just 1 time (in a local newspaper)?

P5 - Answer: The GLO follows the Texas Local Government Code regulations, rather than the Federal requirements, for Competitive Bidding Notice, as it is the more stringent of the two.

Section Pertaining to Counties:
https://statutes.capitol.texas.gov/Docs/LG/htm/LG.262.htm#262.003
Sec. 262.025. COMPETITIVE BIDDING NOTICE. (a)   A notice of a proposed purchase must be published at least once a week for two consecutive weeks in a newspaper of general circulation in the county, with the first day of publication occurring at least 14 days before the date of the bid opening.

Section Pertaining to Municipalities:
https://statutes.capitol.texas.gov/Docs/LG/htm/LG.252.htm
Sec. 252.041. NOTICE REQUIREMENT. (a) If the competitive sealed bidding requirement applies to the contract, notice of the time and place at which the bids will be publicly opened and read aloud must be published at least once a week for two consecutive weeks in a newspaper published in the municipality. The date of the first publication must be before the 14th day before the date set to publicly open the bids and read them aloud. If no newspaper is published in the municipality, the notice must be posted at the city hall for 14 days before the date set to publicly open the bids and read them aloud.

P6 - Question: I've read Chapter 5 and do not see any provisions/requirements on an evaluation committee to review proposals, Statements of Qualifications (SOQs) etc.
Does GLO have any requirements about how many members are needed on an evaluation committee, if any of the members need to be from the governing body?

P6 - Answer: Please refer to your local procurement policies and procedures and adhere to 2 CFR 200 procurement standards. The GLO Implementation Manual (section 5.11.3) states, "Subrecipients must have a written method for conducting technical evaluations of the proposals received and for selecting respondents."

- GLO Implementation Manual – https://recovery.texas.gov/dev/documents/grant-administration/grant-implementation/implementation-manual/glo-cdr-implementation-manual.pdf

Please also refer to the "Buying Right Guide" as published on the HUD Exchange.

- HUD Buying Right Guide – https://www.hudexchange.info/resource/5614/buying-right-cdbg-dr-and-procurement-a-guide-to-recovery/

P7 - Question: We use our PA (public assistance) team from our existing CDBG GLO Hazard Mitigation drainage projects, the team was procured through 2 CFR Part 200 procurement standards.

Can I amend their contract to include this new COG/GLO mitigation funds? Or do I need to put out a new RFQ and start fresh?

P7 - Answer: It depends on how the original procurement was defined. As in, was the RFP/RFQ project specific or was it a more general CDBG-MIT related procurement. The city should review their procurement documentation to determine if a new procurement is required.

Please review the GLO Procurement Guidelines Document and Checklist and the GLO's Procurement and Contract Guidelines webpage.

- GLO Procurement Guidelines Document and Checklist – https://recovery.texas.gov/documents/grant-administration/procurement-contracts-guidelines/procurement-checklist.pdf

- GLO's Procurement and Contract Guidelines webpage – https://recovery.texas.gov/grant-administration/procurement-contracts-guidelines/index.html

Project Eligibility

PE1 - Question: Our work group (representing Polk County) would like you to confirm that there is no minimum dollar amount for a project for this round of funding. Project

minimums were set in past funding opportunities related to the Hurricane Harvey and for this reason my client wishes to have clarification.

PE1 - Answer: Your inquiry regarding minimum funding limits is defined by the approved Method of Distribution (MOD) for the DETCOG Regional Mitigation Program. The minimum funding limit for DETCOG is set $500,000. The approved MOD does not specify minimum amounts per project, but rather by allocation. The approved MOD is available at https://recovery.texas.gov/documents/mitigation/programs/regional-mitigation/detcog-mod.pdf. Please refer to this document for additional details regarding the minimum funding limit and allocation details per jurisdiction.

PE2 - Question: It is my understanding that improvements to evacuation routes which make them more resilient to flooding are potential eligible activities under the MIT program. Is there additional guidance anywhere as it pertains to the standards a road/bridge must be built to in order to potentially qualify for MIT funding (if different from the typical road/bridge standard due to its designation as an evacuation route)? I checked the APA and a few other sources but didn't see anything which spoke to it in more detail. Any insight would be greatly appreciated.

PE2 - Answer: Under the State Action Plan for Mitigation, street improvements are an eligible activity, and bridge improvements fall under that category. The project should repair/rebuild roads and/or bridges to ensure that the people in the benefit area identified will be safer from a future storm event. The GLO does not provide construction guidance, but rather allows the Subrecipient local control for design and construction. The successful applicant should rely on the professional services needed to ensure construction complies with local, state, and federal guidance and industry standards. In addition to the information provided in the Application Guide and other GLO resources, the applicant must review the approved COG Method of Distribution before finalizing project selection to ensure the project selected for the application is an eligible activity in accordance with the approved MOD.

PE3 - Question: In previous mitigation applications, the project definition required that any benefit areas were contiguous with each other to constitute one project of the same project type (sewer / water / etc). Do these mitigation projects still need to be contiguous benefit areas if they are the same project type? For example, if a locality is doing drainage improvements in two areas of town, with two separate benefit areas, is that two separate projects? Or is that one project with two sites?

PE3 - Answer: For this Mitigation Application, a project is defined by Activity Type (sewer/water/drainage, etc.), its beneficiaries, and National Objective. In the scenario presented, the application should consist of two separate projects since they will have different beneficiaries. Both projects would be under the same Activity, but they would be entered as separate projects with separate budgets.

PE4 - Question: I have a question about submitting a project within a HUD MID zip code that benefits the designated zip code and county residents beyond the zip code?

PE4 - Answer: Your letter inquired "whether a project that primarily benefits the HUD MID zip code area can also benefit areas outside the zip code." Further explanation was provided regarding the County's intent to submit two applications including two projects with county wide benefits.

Additionally, the letter requested confirmation "that a project that benefits the entire zip code area, but also benefits Polk County residents outside of the zip code area can be included in the HUD Mid application."

Upon reviewing the program guidance, GLO concludes that the County may submit a HUD MID application for a project that benefits the designated zip code as well as Polk County residents outside the zip code. The proposed project must also meet program eligibility criteria including but not limited to defined risk to be mitigated, beneficiaries, and national objective. The application should include enough information to measure how the proposed project benefits individuals outside the designated zip code and meets overall program eligibility.

PE5 - Question: I don't see where the application guide references the number of applications that can be submitted. If an applicant has more than one project they want to complete with their allocation, do they submit then under one application or multiple applications.

PE5 - Answer: Only one application should be submitted. Multiple Activities and related projects with associated beneficiaries and budgets can be entered on the application. See the guidance below from page 36 of the Mitigation Application Guide.

The applicant will be required to enter the DRGR activity as applicable for the associated proposed project. Multiple activities may be created as required to complete the proposed projects under the mitigation application. From the "Activities" tab, press the "Add Activity" button. Note, once the activity is created it can be edited by selecting the "Edit" button.

PE6 - Question: Proposal Period: What if local governments can't hit 4 month(s) for some reason? Is it an absolute deadline, or is there a process for dealing with overdue applications?

PE6 - Answer: The HGAC deadline for applications is January 9, 2023. Any requests for additional time should be submitted to the GLO for consideration. For other MODs, please refer to your application date in the FAL notification email. Deadlines stated in your notification email must be met. If additional time is needed, please contact the GLO at cdr.mitigation@recovery.texas.gov.

PE7 - Question: Is there a documentation checklist for the proposals?

PE7 - Answer: Assuming that the term "proposal" refers to an application, then yes, a listing of all required application documentation will be posted on the Recovery Website soon at the link below.
https://recovery.texas.gov/mitigation/programs/regional-mitigation/index.html

NOTE: Quickbase and the application guide also provide details on required documents.

PE8 - Question: What level of budget detail is needed for a proposal?

PE8 - Answer: Assuming the term "proposal" refers to an application, all budget detail by project will need to be entered into the application. A breakdown of how much is needed for Construction, Engineering, Acquisition (if applicable), Environmental and Grant Administration (if applicable) fees will need to be entered into the project details in the application. A Budget Justification of Retail Costs detailing all construction costs per project must also be provided.

If there is any other funding, such as other state and/or federal funds, or if local funds will be contributed to any part of the project, these amounts will also need to be disclosed. See pages 61-70 of the Regional Mitigation Application Guide located on the Texas Recovery website for additional guidance.

PE9 - Question: Is formal action from government needed for a proposal (Board approval, etc?)?

PE9 - Answer: Assuming that the term "proposal" refers to an application, then formal action is not required for application submittal unless required by local policies and procedures. Please ensure that you follow all Citizen Participation requirements for application submittal. See pages 26-31 of the Regional Mitigation Application guide on the Texas Recovery website for additional guidance.

PE10 - Question: Are there minimum/max project award amounts (other than max of their allocation)?

PE10 - Answer: As indicated in the approved MOD, there are no maximum or minimum amounts for individual projects. The total of all application projects should not exceed the allocation amount.

PE11 - Question: How is HUD MID/State MID determined for crossover projects that straddle areas, including HUD MID zip codes?

PE11 - Answer: These instances will be handled through technical assistance on a case-by-case basis. Entities in both HUD MID/State MID areas will be contacted by the GLO with additional technical assistance.

PE12 - Question: Can we fund projects partially (i.e. if we fund 10 projects, but don't have the full amount left for the tenth project, can we offer partial funding?)

a) If so, are there any restrictions? Do they need proof of other funding (we would likely require that)?

PE12 - Answer: The COG may use their funds as leverage to fund a communities' project if they do not have enough funds to cover the whole cost. All projects included on the application must show that the project is fully funded. If other funding is used to fund a CDBG-MIT project, proof of other funding must be provided. If you are leveraging with other funds, all CDBG rules apply to those funds. Additional guidance can be found on page on pages 61-70 of the Regional Mitigation Application Guide.

PE13 - Question: How is HUD MID/State MID determined for crossover projects that straddle areas, including HUD MID zip codes?

PE13 - Answer: These instances will be handled through technical assistance on a case-by-case basis. Entities in both HUD MID/State MID areas will be contacted by the GLO with additional technical assistance.

PE14 - Question: Can an applicant bundle multiple activities of similar scope in a single application? For instance, if an applicant is seeking funds in order to purchase multiple generators for various sites (e.g., wastewater treatment plant and water plant), can the applicant include the proposed installation of all in a single application or are you required to segment according to installation site?

PE14 - Answer: A single application may include multiple activities.
For application purposes, A project is defined as a discrete combination of:
- one entity (i.e., city or county),
- one activity (i.e., water, sewer, etc.),
- one project service area (beneficiary population)
- one HUD national objective.
- NOTE:

A site is defined as a discrete location for the activity within a project. A project can have one or more sites.

PE15 - Question: Are there project minimums as it pertains to the monetary floor an application must meet? I noticed that PE1 in the FAQs speaks to it, but I wanted to double check because I was previously told by someone at the GLO that there would be some type of project floor.

PE15 - Answer: There are no minimum amounts for individual projects based on the H-GAC MOD.

PE16 - Question: Are eligible entities permitted to work together and submit joint applications in order to maximize the benefit(s) of their respective direct allocations? For example, a $2M project is identified. Direct Allocation Recipient #1 has a total allocation of

$1.5M; Direct Allocation Recipient #2 has an allocation of $3M. Could Direct Allocation Recipient #2 partner with Direct Allocation Recipient #1 on an application and provide $500,000 of its allocation to help fully fund the proposed $2M eligible project?

PE16 - Answer: Please contact the GLO for technical assistance.

PE17 - Question: Can Regional Mitigation funds be used to help with cost overruns with a current GLO grant?

PE17 - Answer: CDBG funds may not be used to leverage other CDBG funds.

PE18 - Question: Where can I find a list of eligible CDBG-MIT activities?

PE18 - Answer: A list of eligibile activities can be found in section 5.4.6.6 of the Mitigation Action Plan, as amended (page 260 of 589). In the Mitigation MOD for each COG, the COGs may have limited the types of mitigation eligible activities.

https://recovery.texas.gov/documents/action-plans/mitigation/mitigation-sap-amend-1.pdf

PE19 - Question: Do we include Engineering and Admin on the Budget Justification or does it need to be construction cost only?

PE19 - Answer: The Budget Justification should only have construction costs. Please think of this form as the old Table 2 document.

PE20 - Question: What minimum construction standards must be met in the construction of a Public Facility being utilized as a Sheltering Facility during Hurricanes?

PE20 - Answer: The GLO does not provide minimum construction standards for this type of project. Please use local building codes and your procured engineering vendor for guidance. Additionally, please consider compliance with environmental guidance located at the link below.
https://recovery.texas.gov/grant-administration/environmental/index.html

PE21 - Question: Can the CDBG-MIT funds be used for acquisition of property/right-of-way for drainage projects? We have two already planned drainage projects that will need this just to get started. The drawback is once the rights-of-way are bought, there will be significant delay in beginning the projects due to funding.

PE21 - Answer: CDBG-MIT funds can be used for acquisition, however, additional information is needed to provide an accurate response. We recommend an opportunity for technical assistance for this application to facilitate the selection of the most accurate option.

PE22 - Question: In the application, there is unclear language about what to do for localities with an allocation under both HUD MID and State MID:

"Applications from jurisdictions that were allocated funds for both HUD MID and State MID are required to submit an application under both HUD MID and State MID programs." (Page 10 of the application guide)

The language is unclear. Is it one application for both source of funds, or two applications - one for each funding source? Additionally, the online application currently accepts only one option from the dropdown list for the program. This does not allow for putting in a single application that includes both funding sources.

PE22 - Answer: Applicants with both HUD MID and State MID allocations will need to enter two applications in QuickBase by choosing the applicable program (COG + MID designation). If the applicant has a proposed project with a service area in both HUD MID and State MID designated areas, they should contact the GLO via the CDR.Mitigation email to request application entry technical assistance.

PE23 - Question: For MIT-MOD projects, will entities be required to provide an attorney title opinion for the projects? If so, is this an allowable expense of the mitigation funds?

PE23 - Answer: It is not a requirement for entities to provide an attorney title opinion for projects. It is a requirement that the SF-424 Form is signed by someone who is authorized to contractually obligate projects because as soon as the application is submitted it becomes federalized.

If a Citizen Participation Plan is on file, please refer to that for local requirements for application submission. If there are application submission policies, those need to be followed.

PE24 - Question: Are generators installed at fire stations eligible for MIT MOD Applications?

PE24 - Answer: Generator installation at a Fire Station is an eligible activity under the Regional Mitigation Program. Additional information to keep in mind is that generators installed at Critical Action facilities (like a Fire Station) will also be considered Critical Actions. All activities that are considered a Critical Action must be elevated and/or floodproofed, and achieve the applicable FEMA certification(s) at the end of construction, to BFE+3ft. This includes all project areas within the 100-year and 500-year shaded floodplains. Critical Actions are not permitted in the floodway. Please ensure this information is accurately reflected in the community's project design.

PE25 - Question: Are generators at police stations also eligible for regional mitigation funding?

PE25 - Answer: As cited in 84 FR 45838 (August 30, 2019), CDBG–MIT funds may be used for mitigation activities to enhance the resilience of facilities used to provide emergency response services, provided that such assistance is not used for buildings for the general conduct of government as defined at 24 CFR 570.3.

However, to provide an accurate response, further information is needed. Please contact the GLO for TA specific to this type of proposed project.

PE26 - Question: Is the construction of a wet detention pond permitted using MIT monies?

PE26 - Answer: A detention pond is an eligible project, provided the project reduces or eliminates the long-term risk.

PE27 - Question: Can MIT monies be used to develop the area around a detention pond into recreational greenspace, such as building bike/walking paths around the perimeter of the pond, picnic tables, open-air pavilions, and playgrounds? I know these types of activities are permitted, in limited instances, as it relates to the greenspace created from home buyouts funded via CDBG-DR monies but wasn't positive of its permissibility under MIT.

PE27 - Answer: Projects eligible for Mitigation funding must reduce or eliminate the long-term risk. The recreational elements identified in this question, as presented, do not appear to meet the definition of mitigation activities or address the current and future risks identified.

- Mitigation related to Hurricanes,
- Tropical Storms and Tropical Depressions, and
- Severe Coastal and Riverine Flooding.

PE28 - Question: Is a long-term recovery center building designed as a holding space for supplies and post-disaster necessities to reduce hardships and to increase efficiency in resilience, drastically reducing the downtime of a community to resume normal operations post-disaster eligible for the MOD program? This building will not be purposed for sheltering persons during a disaster event.

PE28 - Answer: Without considerably more information, this sounds like a POD or possibly an EOC function. Both are ineligible from CDBG as general conduct of government activities.

The GLO would encourage your community to look for projects that are directly supportive of risks and impacts particularly from flooding, hurricanes, tropical storms, and depressions.

PE29 - Question: I was speaking with a jurisdiction and they are planning on using part of their MIT funds as the match for TDA. They said they spoke to the COG and they agreed it was allowable.

Can you please clarify this? They are a very small jurisdiction, and it would have a significant impact on their funding. Is it allowable? Based on this from the Action Plan, it would appear that it is.

PE29 - Answer: CDBG-MIT funds may be leveraged. However, based on the limited information available, additional information regarding project details, budget, and schedule should be discussed through a Technical Assistance (TA) visit.

PE30 - Question: Would it be considered an eligible project to replace powerline poles throughout a city/town if the locality owns the utilities? If so, would that be infrastructure improvements?

As a mitigation effort, a locality might identify a vulnerability with aged powerline poles at risk of falling over from a storm with strong winds and heavy rainfall. This would cause power loss to important emergency services, houses, and potentially cause damage to nearby residences from the fall.

PE30 - Answer: Yes, this project type would be considered eligible. However, projects eligible for Mitigation funding must reduce or eliminate the long-term risk and meet the definition of mitigation activities or address the current and future risks identified.

- Mitigation related to Hurricanes,
- Tropical Storms and Tropical Depressions, and
- Severe Coastal and Riverine Flooding.

The project is considered an infrastructure activity. Under the Add Activity tab, select "Public Facilities" for the DRGR Activity and indicate the planned budget amount. Select "Add Project" and once the project has been added, the applicant can edit the project at the Activity Table or save and close and edit the project under the Project Table. For either option, the applicant selects a project type. The project type will be "Other Project Utilities."

PE31 - Question: One of our County Commissioners has a question about allowable activities: "under 3.5 Eligible Activities specifically 'v" Public facilities; Can CDBG funds be used for park restrooms?"

PE31 - Answer: Please reach out to the GLO with more information about the project. Projects eligible for Mitigation funding must reduce or eliminate the long-term risk and meet the definition of mitigation activities or address the current and future risks identified.

- Mitigation related to Hurricanes,
- Tropical Storms and Tropical Depressions, and
- Severe Coastal and Riverine Flooding.

PE32 - Question: We were informed that any project submitted on the application must have been included in the applicant's HMAP.

If the HMAP expired September 2022, but renewal updates began prior to the expiration date but have not been finalized/approved through FEMA, would the applicant still be considered as having an active HMAP? If the current approved HMAP is not an eligible plan, what options does the applicant have to do receive the allocated funds?

PE32 - **Answer:** The State of Texas CDBG Mitigation (CDBG-MIT) Action Plan, as amended, and the Regional Mitigation Program Application Guide does not state that any project submitted for the Regional Mitigation Program must have been, or currently be, included in a Hazard Mitigation Plan. The Federal Register notices (84 FR 45838 and 86 FR 561) applicable to CDBG-MIT funding also do not state that projects must be included in a Hazard Mitigation Plan. However, it is encouraged that submitted projects be included in a Hazard Mitigation Plan

Please also view the GLO's Local Hazard Mitigation Plans Program (LHMPP). This program assists eligible entities through providing grants to develop or update local hazard mitigation plans, or to provide cost share for hazard mitigation planning activities funded through other federal sources.

PE33 – **Question:** Why are Public Facilities projects described as Points of Distribution or Staging Areas Ineligible?

PE33 – **Answer:** Per the Regional Mitigation Program COG Method of Distribution Guidance, emergency response services are ineligible activities. The guidance states, "Emergency response services: Emergency response services shall mean those services that are carried out in the immediate response to a disaster or other emergency in order to limit the loss of life and damage to assets by state and local governmental and nongovernmental emergency public safety, fire, law enforcement, emergency response, emergency medical (including hospital emergency facilities) and related personnel, agencies, and authorities."

Quickbase

Q1 - **Question:** How many registrants per application and/or how many registrants can work on the application itself (as a group)?

Q1 - **Answer:** One (1) person should be working on the application in Quickbase at a time.

Q2 - **Question:** Is there print functionality in Quickbase?

Q2 - **Answer:** Yes, there is a print functionality in Quickbase. Please see the below description:

Per the Regional Mitigation Program Application Guide, QuickBase Application (Citizen Participation) Tab, "An application under the CDBG-MIT program may be awarded only if the locality provides evidence that, at a minimum, the substantially complete application was publicly posted for at least a 14-day public comment period, comments received, and responses provided. The substantially complete application should include at minimum, a scope of work, budget, identification of all sources of funding, maps to identify location and beneficiaries."

To publicly post the "substantially complete" application, the QuickBase application has been modified to allow the applicant to print the application. To do so, the applicant should ensure the application does not require any outstanding items by viewing the "Citizen Participation" tab.
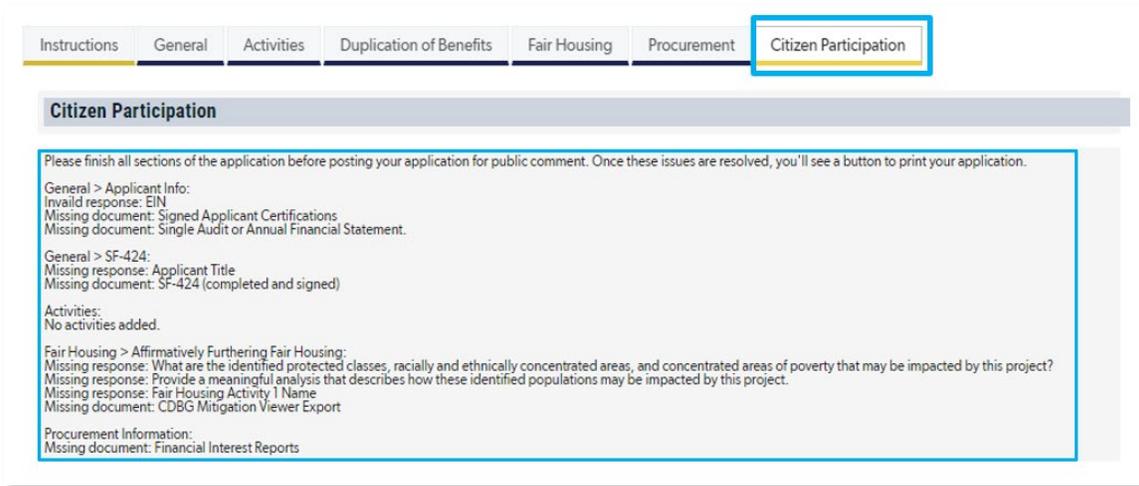
Once all items have been addressed, the "Citizen Participation" tab will allow the applicant to print the application for posting. Please select the "Print Application for Public Comment" to initiate the print function.
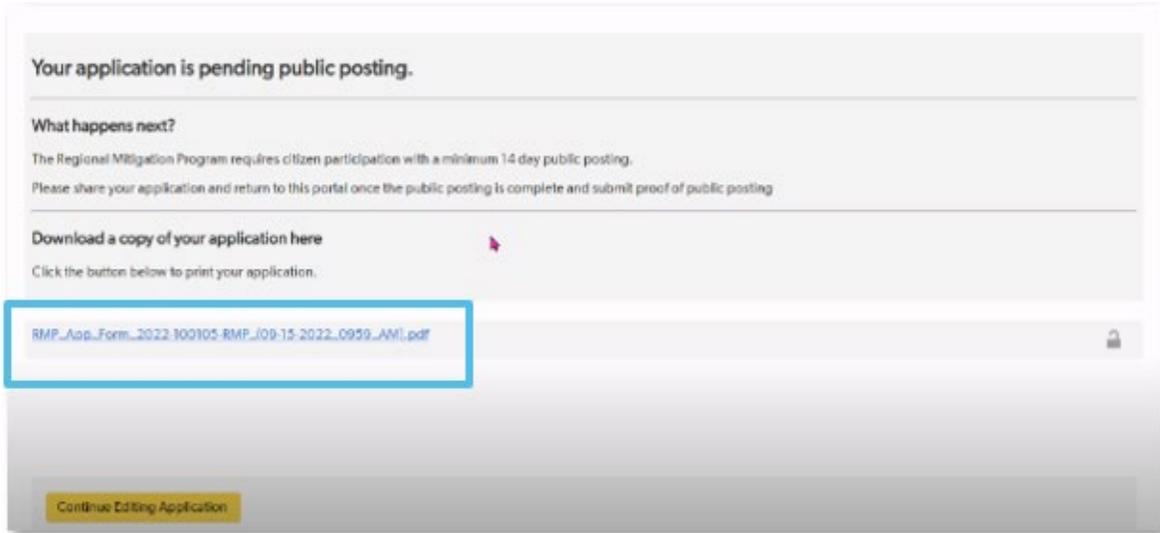

The system may take 1- 3 minutes to create the downloadable application PDF. If the applicant does not see the available print creation within the "Citizen Participation" tab after this allotted time, please refresh the webpage. Once the PDF is available, the applicant can download the application PDF.

After the application is posted for public comment, the applicant can access the "Citizen Participation" tab to "Continue Editing Application"
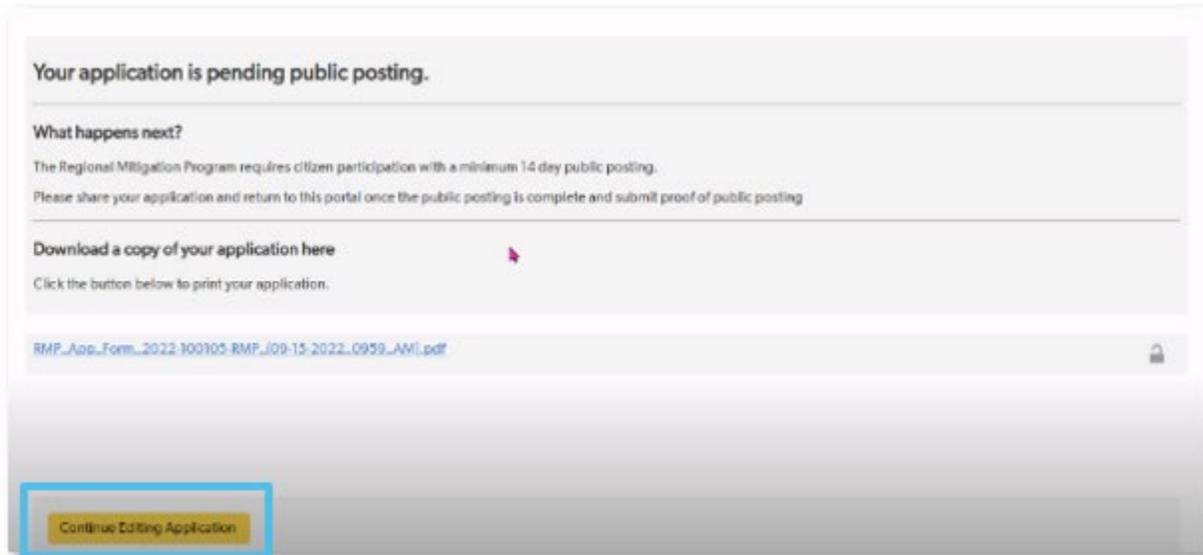
At this point the applicant can edit any part of the application based on the outcome of citizen participation or can update the below required fields if no other edits are required. **Note: The QuickBase system will allow the applicant to re-print the application under this tab if the application is required to be re-posted for citizen comments.**

Citizen Participation

The streamlined requirements do not mandate public hearings but do require a reasonable opportunity (at least 14 days) for citizen comment and ongoing citizen access to information about the use of grant funds.

Did the applicant post the CDBG-MIT application for a minimum of fourteen (14) days?

Yes

When did your jurisdiction post the project for public comment?

Start Date   08-01-2022

End Date   08-15-2022

Please upload proof of public posting.

Add Document

Although a public hearing is not required, if your jurisdiction held one, list the date and attach the supporting documents.

08-19-2022

If a public hearing was held, please upload documentation in support to the public hearing.

Add Document

Full Report | Email | More ▾ 1 Document

Document Attached	Edit
Public Hearing	Edit

Although a resolution is not required, did your jurisdiction approve one?

Yes

Enter the date the resolution was passed.

08-19-2022

Upload a copy of the resolution.

Add Document

Full Report | Email | More ▾ 1 Document

Document Attached	Edit
Resolution to Apply	Edit

Once all citizen participation information is entered into the application, the QuickBase system show a "Submit" tab. The applicant should verify all information is accurate before formal submission to the GLO. The tab will also allow the applicant to print a final application after the submission to the GLO

Q3 Question: Went to the mitigation page and used the registration link. Entered my email

address. Received an email response with link. Clicked on link and entered my email address again and got this screen: "Cannot Register. This is a private Quickbase site. You must request access from an administrator of dmsrecovery.quickbase.com."

Q3 - Answer: This occurrence appears to be a glitch in the Quickbase application system and has been resolved. Please email the CDR Mitigation Team at: cdr.mitigation@recovery.texas.gov if issues with the Quickbase application system are observed.

Q4 - Question: In the new Quickbase application system, there is no apparent way to set up additional users in an application. If a locality has hired a grant administrator to write their grant, then do they set up and submit their application for them? Or is there some way for the system to set up multiple users to the same application?

Q4 - Answer: There is not a way to allow multiple users to edit the same application. For both security and data integrity purposes, we do not recommend having users share applications or accounts. If a locality hires a grant administrator, we recommend that the grant admin sets up their account with their own credentials and list the locality contact info on their application.

You may also request additional Quickbase technical assistance by submitting a request to cdr.mitigation@recovery.texas.gov.

Q5 - Question: In Quickbase, on the Mitigation Tab, the question "Please provide documentation to the identification of the threat or hazard." is listed. What type of mitigation documentation is expected? There is no clarification in the app guide.

Q5 - Answer: The documentation uploaded will vary by applicant based on threat, risk and/or hazard. The applicant should assess the impact of the proposed project and provide sufficient details to support the use of these funds as defined by HUD. Mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate

the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Supporting documentation may include, but is not limited to, technical details as defined in a Hazard Mitigation Action Plan, other plans, local planning resources and tools, or other relevant documentation such as historical data and photos. All supporting documentation must address current and future risk.

Q6 - Question: The application guide (page 10, under the "General Tab" section) goes into detail about selecting the correct program fund for the application. However, the paragraph that explains what to do for jurisdictions that are allocated money from both funds is unclear. Is the application guide recommending that there are separate applications submitted for each State MID and HUD MID allocations? Or is there a way to set up an application so that the allocation amounts can be combined?

Currently, the QuickBase application question for program is a dropdown with a single selection parameter. This currently would not allow for setting up the application for both program funds.

Please advise, and many thanks for your help.

Q6 - Answer: These instances will be handled through technical assistance on a case-by-case basis. Entities in both HUD MID/State MID areas will be contacted by the GLO with additional technical assistance.

Q7 - Question: Would you be able to direct me on where we can find the table 4 referenced on page 74 in the MOD Application Guide? The link in the app guide is not clickable and we cannot find the table anywhere else in the guide book. Any guidance on this would be greatly appreciated.

Q7 - Answer: The Regional Mitigation Application Documentation checklist was posted to the Regional Mitigation Program website October 6, 2022.

Q8 - Question: How does one refresh the link to the printed application in the Citizen's Participation Tab? I made some changes to the application and wanted to reprint, but found no option to reset it. I deleted the attachment even, and no new download became available. Is there a button for this?

Q8 - Answer: Prior to submission, the application can only be printed one time, so please ensure that you do not print until you are ready to post the application for public comment. The final application can be printed again to a PDF after submission.
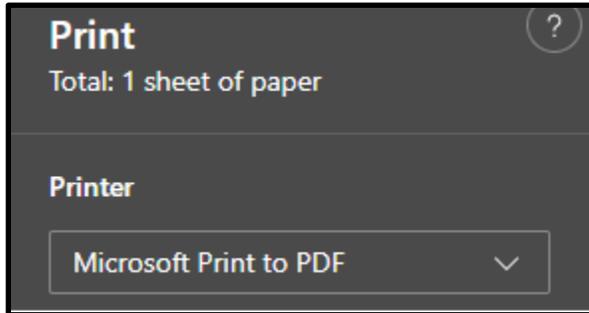
The capability to reprint the updated application prior to submission does not exist in Quickbase. If the applicant finds this necessary, they can do the print screen command on their computer (Ctrl + P), which prints the application one page at a time to PDF:

The applicant would then need to consolidate the pages using Adobe Acrobat PDF Editor.

Q9 - Question: When trying to upload documents under the 'Procurement' tab, I have found that when I select the 'Financial Interest Report' document type from the dropdown, and proceed to attach the file, it is not saved in the application. I wanted to bring this issue to your attention. Can you correct this issue? We do not want our application to be deemed incomplete due to a technical error within the portal.

Q9 - Answer: A setting within Quickbase was failing to save documents if the applicant did not enter a name or description for said document(s). We have now made the Document Name field required to correct for this. This was a technical issue in which Quickbase was not recognizing the file attachment was in fact uploaded and it has since been corrected. Applicants will be prompted to add a Document Name next time they upload.

Q10 - Question: I accidentally created a project in an application. How do I delete or remove the project so it does not show in the application?

Q10 - Answer: Please click into the unwanted project, as if to edit. There should then be a "Delete" button in the top right corner of the screen with a red X adjacent. Please see the below screenshot:
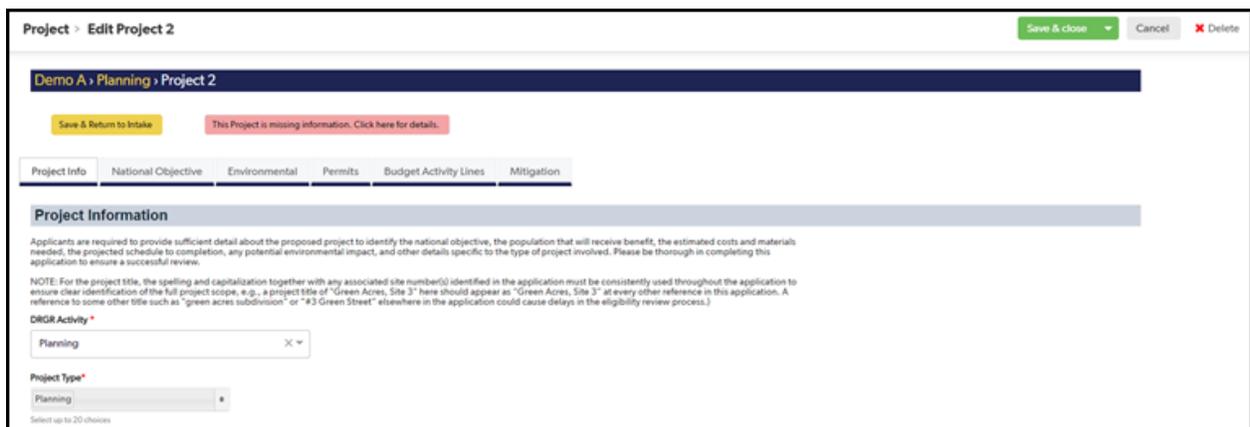
Q11 - Question: Please see the below:
1. General Tab: it will only allow 1 Grant Administrator and 1 Engineer.
2. Activities Tab: In the dropdown the closest option is Public Facilities. If Public Facilities is selected there isn't an appropriate option for Project Type.
3. Activities Tab – National Objective: It will only allow 1 method. Some counties are countywide & some are area benefit.
4. Procurement – It will only allow 1 Grant Administrator and 1 Engineer.

Q11 - Answer:
1. QuickBase has been updated to allow the original creator of the application to add collaborators. Please see screen shots below for instructions on how to accomplish this task in QuickBase. Additionally, if you wish to remove the additional collaborator, you will just delete their address from the applicable "Collaborator" Field.

Instructions Tab (landing page when creating/opening an Intake)

Instructions	General	Activities	Duplication of Benefits	Fair Housing	Procurement	Citizen Participation

Please read the following before completing the Regional Mitigation Program application.

Navigation

The Application is broken into six sections which can be completed in any order:

1. General
2. Activities
3. Duplication of Benefits
4. Fair Housing
5. Procurement
6. Citizen Participation

Instructions:

1. Fill out all required information on each of the tabs listed above.
2. To save your progress, navigate to the green Save button. Click the down arrow to access more options and select Save & keep working.
3. When all tabs have been completed, please navigate to the Citizen Participation tab to see if there are any missing requirements.
4. If no requirements show under Citizen Participation tab, click the yellow Print Application for Public Comment button.
5. Fill out all required information on the Citizen Participation tab after the completion of the public comment period.
6. If no requirements show under the Submit tab, click the green Submit button to submit the application to the GLO and print the final application as a PDF.

For additional information, refer to the Regional Mitigation Program website.

Click below to add collaborators who can view and edit this application.

Add Collaborator

Add Collaborators page

2. The applicant may choose "Other Public Utilities". However, we recommend an opportunity for technical assistance for this application to facilitate the selection of the most accurate option.

3. The National Objective is contingent on the project service area. However, we recommend an opportunity for technical assistance for this application to facilitate the selection of the most accurate option. To prepare for technical assistance, please prepare a map that clearly defines the service area with census tracts and block groups identified.

4. GLO will follow up with our team to identify a way to update QuickBase to allow additional contacts to be added. In the meantime, please upload a listing of all additional Grant Administrators and/or Engineers to the application.

Q12 - Question: I am trying to complete a MOD application and it is showing an error when I attempt to exceed the 15% engineering fee. The grant amount has not been exceeded, just the engineering. The MOD application manual allows for this with a justification of reasonability as described below in the MOD application manual. I realize the GLO can say no when reviewing, but the QuickBase will not allow me to submit as long as it is exceeded. Please provide guidance.

Q12 - Answer: QuickBase has been updated to allow engineering fees beyond the 15 percent cap previously limited by an auto calculation. Applicants requesting engineering fees beyond

the 15% cap must provide justification as indicated in the application guide. See page 62, "The applicant must attach to the application justification by the engineer for engineering fees that exceed 15 percent of the total construction cost. GLO will review the justification for reasonability." https://recovery.texas.gov/documents/mitigation/programs/regional-mitigation/mit-mod-application-guide.pdf

Q13 - Question: Under the Procurement tab, I have inadvertently entered two extra lines that I cannot delete.

Q13 - Answer: Our QuickBase team was able to fix your technical issue for both the Procurement and Contact tables. You should now be able to click on the boxes to the left on the Procurement table and delete them.

To summarize - vendors and contacts can be added and deleted, but applicants will be required to have at least one of each Vendor Type (Environmental, Engineering, Grant Administrator) and one of each Contact Role (Chief Elected Official, Grant Administrator, Primary Contact, Authorized Representative, Engineer) in order to submit.

Please email CDR.Mitigation@recovery.texas.gov if further questions arise.

Q14 - Question: A series of questions regarding the TINs number were received regarding accepting nine (9) and/or eleven (11) digit numbers, along with an error message about the TINs not being accepted at all.

Q14 - Answer: The QuickBase system should now be able to accept the applicable nine (9) or eleven (11) digit TIN number at this time. This was resolved on 11/14/2022.

Q15 - Question: In the QuickBase application, it is required to set up a project site - however, if the project is a planning project, how is it suggested to establish the site details? Is the

street address the city hall or courthouse location? Is the midpoint GPS for the center of the entire jurisdiction? What would be the street limits?

As the project is a planning project, there is not a central location for the project, nor is it a public facility or a linear feet measurement. Any advice on how to answer these questions would be appreciated.

Q15 - Answer: Please create one project site per planning only project.

- For street address = "Entity Name" + "Planning Project"
- Street limits on Street = "City-wide" or "County-wide" or other regional identifier name.
- From Street = "City-wide" or "County-wide" or other regional identifier name.
- To Street = "City-wide" or "County-wide" or other regional identifier name.

Latitude and longitude coordinates should reflect the center point of the area covered in the plan.

Q16 - Question: How do I record the performance measure(s) for a Planning project?

Q16 - Answer: Performance metrics are now optional on sites for Planning projects. The question is still visible in Quickbase, but you will not see an error message if it is left blank. This update is as of December 05, 2022.

Q17 - Question: We are attempting to download a copy of our RMP application from the Citizen Participation Tab. However, we are still unable to do so and the document had never downloaded initially.

Q17 - Answer: Our Quickbase team determined this issue is due to an error that occurred on the backend of Quickbase.

The application posted for public comment. During that time, there was an error in Quickbase that has since been resolved and the application was unable to be printed. Our Quickbase team determined the print capability now works, so the applicant should be able to print their application again using the "Print Application" button on the Submit tab.

Q18 - Question: I am completing an application and under Project, there is no activity listed for Communications, however, the application guide says it is eligible. What should I put in for the activity?

Q18 - Answer: It depends on the type of communication project but select "Other Public Utilities" for now. If we need to update the project type once we have all the project information, we can certainly do that during the RFI process.

Q19 - Question: I submitted a MIT MOD application yesterday and I have been waiting for the final downloadable application to appear. I know it's a rather large application so maybe that is why it's delayed. However, if someone can just check on it or help it along that would be great.

Q19 - Answer: The application exceeded the size limit for printing. Please contact CDR.Mitigation@recovery.texas.gov if this occurs to your application.

Q20 - Question: What are the minimum requirements to complete a planning only project in QuickBase?

Q20 - Answer: The following questions/sections should be addressed on the Project Info tab of the Project:

Project Type= Planning
Project Title
Provide a detailed description of the scope of work proposed…
Upload a map of the area to be involved in the planning activity
Create at least one project site and enter information for the center point of the planning area

The following questions/sections should be addressed on the national objective tab of the Project:

Provide Total Number of Beneficiaries
Provide Number of LMI Beneficiaries
Percentage of LMI Beneficiaries
Enter the Census Tracts and Block Groups to be Served
Enter the Race/Ethnicity/ Gender of all persons in area
Upload a Census tract map of the service are, LMISD, and DP05 (Note planning activities do not require a National Objective, but this information is used for reporting purposes)
US Congressional District, Texas Rep District, and Texas Senate District

All Questions on the Environmental, Permits, and Mitigation tab should be addressed

On the Budget Activity Line tab indicate the cost for the planning study in the planning budget code. Grant Administration is allowed for planning activities, but no Environmental or Engineering funds should be entered into the project budget.

Q21 - Question: Please clarify. The 14-day requirement could be posted on the county's website once the projects have been selected?

Q21 - Answer: The Regional Mitigation Program Application Guide states, "An application under the CDBG-MIT program may be awarded only if the locality certifies [and] provides evidence that, at a minimum, the substantially complete application was publicly posted for at least a 14-day public comment period, comments received, and responses provided (Page 26)."

Q22 - Question: Please clarify. The 14-day requirement could be posted on the county's website once the projects have been selected?

Q22 - Answer: It is not believed the capacity exists for the applicant to provide a link to the application in Quickbase for public posting.

Prior to submission, the application can only be printed one time, so please ensure that you do not print until you are ready to post the application for public comment. The final application can be printed again to a PDF after submission. The capability to reprint the updated application prior to submission does not exist in Quickbase. If the applicant finds this necessary, they can do the print screen command on their computer (Ctrl + P), which prints the application one page at a time to PDF:
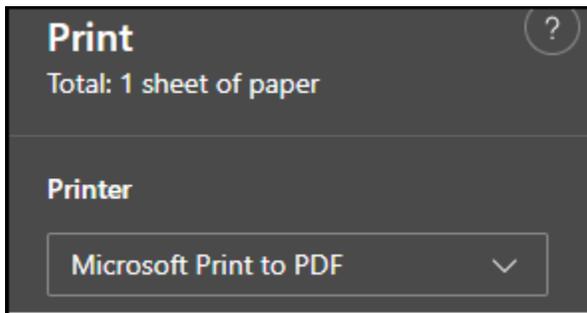
The applicant would then need to consolidate the pages using Adobe Acrobat PDF Editor.

Q23 - Question: Is there a way to download the RFI? QuickBase does not allow more than a few people to have access to the application. Can you give access to the engineers and City/County officials?

Q23 - Answer: Our Quickbase team confirmed that if the applicant wants to give access to additional people to edit their application, they can add collaborators by clicking on the "Add Collaborator" button on the Instructions tab.

The collaborators will need to be registered to Quickbase, which they can do on the GLO Regional Mitigation Program website. They will need to click the Application Registration link first, follow the steps, then click the Application Portal link. RFIs are viewable and editable for these users.

Q24 - Question: I am unable to access the application. In trying to create an account, I am being told I must request access from the administrator of dms.recovery.quickbase.com, a website I cannot access. I cannot respond to an RFI that I can't access. Any guidance?

Q24 - Answer: In order to access Quickbase and the Regional Mitigation Program application, you would have to first register. From there, to be able to edit the application and respond to an RFI, a second collaborator must be added by the record owner or the first collaborator. The steps to add a collaborator are found on the instructions tab of the application.

SF-424

SF1 - Question: Is the SF424 that expires in December of 2022 expected to be used on all future CDBG-MIT COG MOD applications? Can the CFDA and/or the Funding Opportunity Number be provided for the SF424 on this program?

SF1 - Answer: The GLO will update the competition resource page as the revised SF-424 becomes available. Until this time, the current version on the recovery.texas.gov web page should be utilized.

Question #11 - What is the CFDA Number?

Answer: This is not a required field, but you may enter 14.228 for the number and State CDBG Grantees for the title.

Question #12 - Funding Opportunity Number?

Answer: The Funding Opportunity Number is: 84 FR 45838 and 86 FR 561 and Regional Mitigation Program for the title.

SF2 - Question: I hope you are well. Some communities are wrapping up their MOD applications and are preparing for their applications' public comment period, but there is some confusion that has risen related to QuickBase and the application process related to the SF-424 form.

In QuickBase (see screenshot below) communities are required to upload signed Applicant Certifications and a signed SF-424 form before they can undergo the 14-day comment period.

Traditionally, these documents are not signed by the authorized representative of a jurisdiction until the minimum comment period is complete and the local governing body has approved the application for submission. The screenshot below is of the 21st step on the SF-424 instructions posted on the GLO's Regional Mitigation page and it states local government bodies need to authorize individuals to sign the SF-424 form.

SF2 - Answer: The applicant can upload the unsigned version of the SF-424 Form to meet the requirement so the application can be printed for the minimum comment period. Once the form has been signed, the signed version should be uploaded to the application prior to submission.

The Federal SF-424 Form instructions posted under the application resources section of the Regional Mitigation Program includes some language that is specific to federal requirements. To clarify the requirement identified under item 21, the GLO does not require a resolution designating a signatory for application submission. Typically, the signatory is the Chief Elected Official for the applying jurisdiction. If someone other than the Chief Elected Official signs the SF-424 Form, or any other application documents requiring a signature, please ensure they have the ability to contractually obligate the applicant.

SF3 - Question: We have obtained the SF-424 PDF from the Regional Mitigation Program Web page. The instructions for the form indicate that Field Numbers 10, 11, 12, and 13 are pre-populated if using Grants.gov

10 Name of Federal Agency
11 Catalog of Federal Assistance Number/Title
12 Funding Opportunity Number/Title
13 Competition Identification Number/Title

However, these fields appear blank in the downloaded form
Would you be able to provide this information or let us know where it can be obtained?

SF3 - Answer:

10) U. S. Department of Housing and Urban Development (HUD)

11) CFDA Number - 14.228

11) Title - Community Development Block Grants/State's Program

12) Number - 84 FR 45838 and 86 FR 561

12) Title – Community Development Block Grant Mitigation (CDBG-MIT)

13) Competition ID number/title - *Please leave blank as the Regional Mitigation Program is not a competition.

Other Questions

O1 - Question: Can staff time be reimbursed for time spent working on the application?

O1 - Answer: Pre-Agreement costs are allowable for this program, but funds cannot be requested by the entity until the GLO/Subrecipient contract is executed. Care should be taken to document time and activities, which will need to be submitted along with the reimbursement request.

O2 – Question: Is the existing FAQ going to be updated, and will there be additional guidance on the website you linked in the email sent to the local governments?

O2 – Answer: The FAQ will be updated periodically as questions are received by the GLO and posted to https://recovery.texas.gov/mitigation/programs/regional-mitigation/index.html.

O3 - Question: Can Regional CDBG-MIT funds be used to supplement TWDB funds on a project?

O3 - Answer: CDBG-MIT funds can be used to supplement other state agency funds, but additional information is needed on the type of project and the type of other funding to determine eligibility.

Please contact the GLO with project information at cdr.mitigation@recovery.texas.gov. Technical Assistance can be provided.

O4 - Question: Sam.gov has been really busy lately making it difficult to retrieve the required document showing that the DUNS/UEI number is active. Is there a possibility to have this document changed in QuickBase from a required document to a not required document so that if we are unable to get it by the application deadline it will not prevent submitting the application.

O4 - Answer: Evidence of an active DUNS/UEI number is required with the application. The GLO requires that this form be uploaded with the application as it is needed to begin the contracting process. This document will remain a required document in the QuickBase application, so please ensure that you have this documentation prior to beginning the application.

O5 - Question: As the GLO is the Responsible Entity on COG projects will the GLO be completing the Environmental Exemption forms on the MIT Regional applications submitted by COGs?

O5 - Answer: Subrecipients that cannot act as the Responsible Entity (RE) for projects that have not gone to contract have the following options for completing the ERR:

1) The subrecipient can pair up with City/County to act as RE on their behalf.

2) GLO is RE but the subrecipient or their ESP will complete the ERR on our behalf. We review /approve it and submit RROF to HUD.

O6 - Question: What is the suggested length of a project schedule? I have been working with a 24-month timeframe typically, but in some circumstances, especially considering the size of the allocation, it would seem prudent to possibly make a project 30-month long contract.

O6 - Answer: Applicants must provide a Project Schedule that represents the entire proposed scope of work. Applicants must consider any factors, such as special permitting/migratory patterns/seasonal issues, that may impact completion of the project.

O7 - Question: We are currently working with a community that is interested in submitting an application and had one question about the 147c (EIN Verification Letter) requirement. If a community has a 147c from 2019, should this be acceptable as long as nothing changed, or do they need a more recent copy? Please advise.

06 - Answer: Yes, we will accept a 147c form from 2019. We are just wanting to verify the number is correct.

O7 – Question: Is there a specific form or type of document that will satisfy the Urgent Need Documentation (UNM) requirement on applications?

O7 – Answer: The GLO does not provide a specific document to fill out for projects that meet the National Objective of Urgent Need Mitigation (UNM). A UNM guidance document can be found on the Recovery.Texas.Gov website on the Regional Mitigation page under "Application Resources". Information should be provided in a narrative, either within the application or as a separate uploaded document.

O8 – Question: In the application guide, it is said that we must use the start date on the application as 4/1/2023, which was also the guidance I was using to determining the fair housing activity dates. As more applications are due after April, is there a new suggested time for the contract start date for these applications?

O8 – Answer: Please use the guidance suggested in the Regional Mitigation Application Guide of using a date after the application submission date for the project schedule to begin. Additionally, entering the actual date the applicant has indicated for initiating a fair housing activity is recommended.

O9 – Question: Regarding the city of Flatonia. With the AMI waiver, they are 38.42 LMI. However, based on the 2021 LMISD, they are 59.93. Is this an error? If not, can the city forgo the waiver and use the LMISD from 2021?

O9 – **Answer:** It is not a mistake. Flatonia is one of several communities who's LMI percentage went down when the waiver was applied. The GLO has adopted the FY 2021 LMISD with Waiver Applied for use for all Regional Mitigation Program applications. All applications received for this program will need to use the data provided in the current adopted LMISD, available on our website, for beneficiary identification, if not using survey's.