

COSCALA DISASTER RECOVERY SUBCOMMITTEE

GENERAL PRIORITIES

MARCH 2020

OVERVIEW

Primary priorities indicate the top statutory and regulatory priorities of the Disaster Recovery Subcommittee. These priorities are actively being addressed by working groups. The secondary priorities are for future discussion, focus and consideration. Presumably this subcommittee will evaluate this list and select current priorities as changes are implemented or conditions change. Working groups can be established to address priorities as needed.

PRIMARY PRIORITIES

- Codify CDBG-DR in statute to standardize requirements and reduce time from impact to implementation (this should include reducing timelines for action plan approval and *not* adding on additional onerous requirements that are covered elsewhere in federal requirements).
- Appropriately fund a permanent, professional disaster recovery staff at HUD that can provide hands on technical assistance to new disaster recovery grantees in a timely manner.
- On projects that include funds from more than one federal source, secondary funding agencies will accept standards and compliance requirements of the primary funding agency, including environmental and labor compliance.
- Develop and adopt FEMA policy that will allow CDBG-DR projects to provide global match for FEMA PA projects.
- Streamline environmental requirements by eliminating site-specific environmental reviews for rebuilding existing homes as the Tier I review is sufficient to ensure safety and protection of the environment, and the Tier II (site-specific) reviews are costly but rarely, if ever, result in project changes.
- Streamline and standardize data sharing between grantees and federal agencies (Primarily HUD, FEMA and SBA). This data is critical to completing damage assessments and later to implementing duplication of benefits evaluation. Standardized data sets and standard data sharing agreements should be pushed down from the Federal agencies rather than leaving grantees to struggle with what to ask for and how to ask for it.

SECONDARY PRIORITIES

- Rebuilding standards for recovery projects need to be standard across different federal sources of funding (i.e. HUD and FEMA funded programs).
- Require SBA and HUD to coordinate requirements for business assistance applications. Ideally a single application that can be utilized by both programs.
- Streamline or remove the compliance requirements of Davis Bacon. This can include updating the threshold to a reasonable amount, waiving requirements in the event of a disaster or modifying the requirements to be less administratively burdensome while meeting the valid intent of the law.
- Modify 24 CFR Part 55 to apply the same standards to floodways as currently exist for coastal high hazard areas.
- Modify 24 CFR Part 55 to waive the 8-step process for activities designed for floodplain restoration, including acquisition for open space and removal of structures in the floodplain.
- Prompt and improved communications between HUD and grantees, including corrective actions and deadlines, to ensure that compliance issues do not delay funds availability or program implementation.
- Simplify and reduce the reporting requirements in DRGR to align with IDIS requirements.
- Reduce HUD's 60 day review process to 30 days (NOTE: This has been covered in the first Primary Priority indicated above).
- Improve the planning and community design of rural areas.
- Accelerate the private sector's development of disaster recovery solutions.
- Green energy/infrastructure expansion and flexibility.
- Flexibility to work with and assist neighboring states (NOTE: The EMAC process is available as a tool to bring in expertise from other States).
- Expansion of communications infrastructure as an eligible activity.