



GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS

Advice on HUD's New Grant Agreement Requirements

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COSCDA

Council of State Community Development Agencies

March 16-17, 2026
Program Managers Training Conference

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Georgia's Programs

CDBG-DR Program

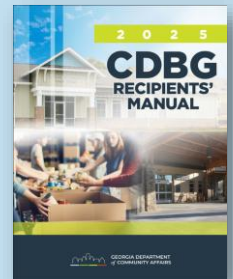
- Housing Reconstruction / Rehabilitation Program
- Affordable Rental Development Program
- Mitigation Infrastructure Program
- Hazard Mitigation Match Grant Program
- Nearly \$400 million portfolio



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Annual Formula CDBG Program

- Annual Competition
- Employee Incentive Program
- Redevelopment Fund
- Immediate Threat and Danger Program
- Innovative Grant
- ~ \$40 million per year



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Executive Orders Affecting CDBG



Executive Order 12898
Environmental Justice

- Rescinded January 2025
- Historically informed EJ considerations across federal programs

Executive Order 13166
Limited English Proficiency

- Rescinded by US Atty General by EO 14224 (March 2025)
- Affects access to programs

Executive Order 14173
Equal Employment Opportunity

- Issued January 2025 and rescinded prior EEO orders
- Affects contracts clauses

Executive Order 14008
Climate Considerations

- Rescinded March 2025
- Encouraged using CDBG funds to support projects that provide community benefits, such as reduced environmental exposure, and increased energy efficiency.

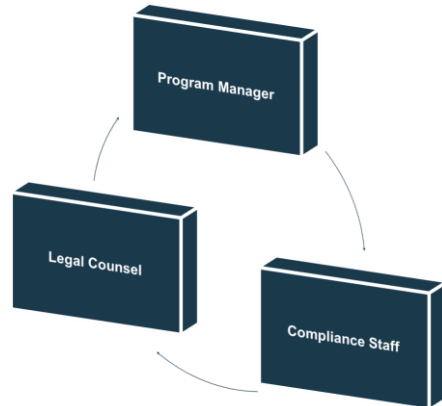
Executive Order 14096
Environmental Justice for All

- Rescinded January 2025
- Established a federal requirement to mandate EJ into federal agency missions, focusing on communities with low income, high pollution, or persistent inequality.

DCA's Policy Review Approach

Review and Determine:

- What language must remain due to **statutory requirements**
- What language may need **revision in grant agreements**
- What practices should we maintain because they are **good program management**, even if no longer mandated





Chapter 2: Major Compliance Requirements and Procedures

Section 1: Applicable Laws and Regulations

Current State and Federal laws, as well as regulations and Executive Orders, are available in part or in whole to the Community Development Block Grant (CDBG) program. To assist recipients in meeting applicable requirements, the Department of Community Affairs (DCA) provides guidance in the form of this Manual, on-site technical assistance, and through the sponsorship of workshops and training conferences. To obtain copies of these publications, requests should be addressed to:

The Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20540

Many of the specific Federal laws, regulations, and Executive Orders pertaining to Housing, Community Development, Fair Housing, Labor, and Environmental regulations are also available on the World Wide Web. A good starting point is www.federalregister.gov. Information is also available from:

Code of Federal Regulations <http://www.cfr.gov/>
Community Connections <http://www.cca.gov/>
1-800-999-9999

The publication laws, regulations and Executive Orders (classified in general by compliance area) include but are not limited to:

General:

- 1. The Housing and Community Development Act of 1974, as amended and as implemented by the most current HUD regulations (24 CFR Part 570)
- 2. Annual Action Plan and State of Georgia CDBG Reform of Distribution (RDOE) for FFY 2022/2023 Consolidated Funds
- 3. State Community Development Block Grant Program Regulations (24 CFR Part 570, Subpart 3)
- 4. Title 50, Chapter 38, Article 4, Official Georgia Code, Georgia Open Records Act

Financial Management:

- 5. 2 CFR Part 200, Subpart F (Formerly Federal OMB Circular A-133)

Civil Rights:

- 6. Title VI - Civil Rights Act of 1964 and implementing regulations at 24 CFR Part 1.
- 7. Section 504 - Title 7 - Housing and Community Act of 1974 and implementing regulations at 24 CFR Part 1.
- 8. Title VII of the Civil Rights Act, 1964 (Fair Housing Act), as amended
- 9. Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990
- 10. Executive Order 12146 - Equal Employment Opportunity, as amended by Executive Order 11775, Parts I and II
- 11. Executive Order 11863 - Equal Employment Opportunity, as amended by Executive Order 11775

- 12. Section 3 of the Housing and Development Act of 1968, as amended Section 118 of Title L, Community Development and Housing Act, 1974, and implemented by HUD regulations
- 13. Georgia Department of Community Affairs Civil Rights Compliance Checklist Form
- 14. Fair Housing Act of 1968
- 15. Executive Order 14176: National Priority to Develop Minority and Women Owned Businesses
- 16. Section 504 of the Rehabilitation Act of 1973 and implementing regulation (24 CFR Part 1)
- 17. Section 504 of Title I of the Housing and Community Development Act of 1974 and the implementing regulations at 24 CFR Parts 1, 91, 92, 97A, 124, 126, and 160

Labor Standards:

- 18. The Control Work Hours and Safety Standards Act (49 U.S.C. 327-330), as supplemented by Department of Labor regulations
- 19. The Davis Bacon Act (40 U.S.C. 276a) in (a)-(7), as supplemented by Department of Labor Regulations
- 20. The Contract "Not-Kickback" Act (18 U.S.C. 874), as supplemented by Department of Labor regulations

Assistance/Rehabilitation:

- 21. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (46 U.S.C. 1601) and Regulations at 40 CFR Part 24
- 22. Georgia Real Estate Appraiser Licensure and Certification Act (O.C.G.A. Section 43-39-A-1 thru 43-39-A-17)
- 23. The Georgia Education Assistance and Land Acquisition Policy Act of 1971
- 24. The Georgia Urban Redevelopment Act (O.C.G.A. Section 38-8-1, et. seq.)

Housing:

- 25. The Truth in Lending Act (Regulation Z)
- 26. Title 1 Consumer Protection Act (R. 80231)
- 27. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4818-4, et. al) and HUD implementing regulations (24 CFR Part 30)
- 28. The Residential Lead-Based Paint Hazard Reduction Act of 1991 (PL 102-593)
- 29. The National Manufacture Housing Construction and Safety Standards Act of 1974 (42 U.S.C. 5463, et. seq., as amended)
- 30. Manufacture Housing Act (O.C.G.A. Sections 8-1-19 and 8-1-10, et. seq.)
- 31. Construction Industry Licensure Board Act (O.C.G.A. Section 40-1-9, et. seq.)
- 32. Georgia State Uniform Construction Code Act (O.C.G.A. Section 9-2-2)
- 33. The Fire Administration Authorization Act of 1982 (PL 102-522)

Environment:

- 34. The National Environmental Policy Act (NEPA) of 1969, as amended by Executive Order 11955 of May 24, 1977 and the Council on Environmental Quality's (CEQ) NEPA Regulations, 40 CFR Parts 1500-1508
- 35. Environmental Review Procedures for the CDBG Program, 24 CFR Part 58
- 36. The National Historic Preservation Act of 1966, as amended, particularly Section 106
- 37. Executive Order 11933, Protection and Enhancement of the Cultural Environment, May 13, 1971
- 38. The National Sanitation Act of 1960, as amended, particularly Section 1, as amended by the Archeological and Historic Preservation Act of 1974
- 39. Flood Disaster Protection Act of 1973, as amended
- 40. Executive Order 11868, National Management, May 24, 1977
- 41. Executive Order 11890, Protection of Wetlands, May 24, 1977

- 42. Georgia Air Quality Act of 1978 (OCGA Section 12-9-1, et. seq.) to regulate air pollution and protect air quality
- 43. Shore Assistance Act of 1977 (OCGA Section 12-5-230, et. seq.)
- 44. Georgia Hazardous Waste Management Act (OCGA 12-8-60, et. seq.)
- 45. Georgia Health Code (OCGA 31-3-1, et. seq.) regulates individual sewerage treatment systems

- 46. The Coastal Zone Management Act of 1972, as amended
- 47. The Safe Drinking Water Act of 1974, as amended
- 48. The Endangered Species Act of 1973, as amended, particularly Section 7
- 49. The Archeological and Historic Preservation Act of 1974
- 50. The Coastal Resources Barriers Act of 1982
- 51. The Wild and Scenic Rivers Act of 1968, as amended
- 52. The Clean Air Act Amendments of 1970, as amended
- 53. HUD Environmental Standards (24 CFR, Part 51) Environmental Criteria and Standards
- 54. Georgia Coastal Marshlands Protection Act of 1970
- 55. Georgia Groundwater Use Act of 1972 (OCGA Section 12-5-170, et. seq.)
- 56. Georgia Safe Drinking Water Act of 1977 (OCGA Section 12-7-1, et. seq.)
- 57. Georgia Erosion and Sedimentation Act of 1975 (OCGA Section 12-7-1, et. seq.)
- 58. Georgia Solid Waste Management Act (OCGA Section 12-8-20, et. seq.) for collecting garbage or operating a landfill
- 59. Georgia Water Quality Control Act (OCGA Section 12-5-20, et. seq.)
- 60. Farmland Protection Policy Act of 1981 (and the regulations at 7CFR Part 658)

Other:

- 61. Georgia Handicap Accessibility Law (OCGA, Title 35, Chapter 3) concerning handicapped accessibility to public buildings
- 62. Georgia House Bill 1079 as amended by House Bill 513 (O.C.G.A. § 36-91-1 through §36-91-95) Note: DCA has adopted this as the procurement regulation for CDBG
- 63. OCGA 13-10-90: Contracts for Public Works, Security and Immigration Compliance
- 64. OCGA 50-36-1: Verification of Lawful Presence within United States
- 65. Federal Funding Accountability and Transparency Act (FFATA)
- 66. Build America, Buy America (BABA) Act 41 U.S.C. 8301 note
- 67. Violence Against Women Act (VAWA, 34 U.S.C. § 12471 et. seq.)

Adjustments to Grant Agreement

- HUD guidance is still pending
- In our Recipients' Manual, all applicable laws and Executive Orders are outlined for reference.
- Grant award documents require recipients to certify that they will comply with all applicable laws and related Executive Orders.

Key Takeaway

- Policy alignment requires both legal analysis and programmatic planning
- Structured approach ensures programs remain:
 - Compliant
 - Transparent
 - Meaningful Access



Helping to build strong, vibrant communities.

We provide support to communities on their journey towards growth and prosperity.

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