

MITIGATION PLANNING AND PUBLIC SERVICES: FREQUENTLY ASKED QUESTIONS

1. What programs were created to address unmet needs resulting from 2017 federally declared disasters?

To address unmet needs resulting from 2017 federally declared disasters, HCD created programs under the CDBG-DR and CDBG-MIT funding allocations from Congress. The MIT-Planning and Public Services Program is a result of the CDBG-MIT funding. More information about the programs related to the 2017 disasters can be found on HCD's [CDBG-DR](#) and [CDBG-MIT](#) webpages.

2. What is the maximum award that can be requested for a single project?

The maximum grant award amount per project is \$500,000. The maximum amount an entity may receive is \$2,500,000. Applicants are required to provide a total budget for the project. The budget should identify the line items being requested for funding from this program. Those items should depict actual costs for the items that will be requested for reimbursement.

3. Is there a match requirement?

At this time, HCD does not anticipate requiring a local match to receive funds. CDBG-MIT funding can be used as local share of federal funding if projects meet mitigation criteria.

4. What is the MID requirement for MIT-PPS?

Projects must benefit the areas designated by HUD as being most impacted and distressed (MID) within the federally declared disaster impacted counties under DR-4344 and DR-4353. Projects that benefit the MID may either be located within the MID or serve areas including the MID. A project located outside of the MID that serves the MID should provide an explanation for how the project will impact the MID but there is no percentage or portion requirement that the project must serve the MID (i.e. a countywide plan that serves the county equally, including MID area(s).)

5. How is the MID determined?

The MID is defined by HUD as an area (county or zip code) that meets the following criteria:

- Areas where FEMA has allocated FEMA Individual Assistance/Individual Household Program, and
- Areas with concentrated damage defined as:
 - Counties exceeding \$10 million in serious unmet housing needs—and most impacted zip codes,
 - Zip codes with \$2 million or more of serious unmet housing needs,
 - Disaster meeting the Most Impacted threshold,
 - One or more county that meets the definition of Most Impacted and Distressed (Sonoma County or Ventura County), and;
 - An aggregate of Most Impacted zip codes of \$10 million or more.

The MID areas for the MIT-PPS program are:

- Sonoma County
- Ventura County
- 95470 – Mendocino County
- 95901 – Predominantly Yuba County
- 94558 – Predominantly Napa County
- 95422 – Predominantly the City of Clearlake in Lake County
- 93108 – City of Montecito, located in Santa Barbara County

6. Does a project need to meet a requirement that a certain percentage serve the MID?

No. Funded projects must either be located in the MID or serve the MID but there is no requirement for how much of the project must serve the MID. The CDBG-MIT program has a requirement to spend 50% of funds in the MID and 50% of funds on projects that serve the MID. MIT-PPS program applicants must only demonstrate that the project is in the MID or serves the MID, they do not need to demonstrate how much of the project or funding will serve the MID.

7. How can applicants meet the MID requirement if they are not located in a MID area?

If an applicant or its project is not located in a MID area, it would have to show how the project serves or benefits a MID area. For example, a county may want to pursue a county-wide plan as a MIT-PPS project. The county would need to demonstrate how the MID area in the county would benefit from the county-wide plan.

8. What are the National Objective requirements for MIT-PPS?

Planning projects do not need to meet a National Objective for CDBG-MIT because planning efforts are considered as addressing the National Objectives without the limitation of any circumstances. Public Services projects must meet a National Objective either through Low-to-Moderate-Income (LMI) or Urgent Need Mitigation (UNM).

9. What is the Urgent Need Mitigation (UNM) National Objective?

A new National Objective specific to CDBG-MIT funding. Projects using the UNM National Objective must provide documentation that demonstrates a verifiable impact on reducing risks at the completion of the activity. Projects using the UNM National Objective must have a quantifiable mitigation or resilience benefit to the community.

10. Can MIT-PPS funding be used to support the development of a Hazard Mitigation Plan?

Yes, MIT-PPS funds can be used to support the development of Hazard Mitigation Plans.

11. Can the MIT-PPS program be used for FEMA Hazard Mitigation Grant Program (HMGP) match?

Yes, MIT-PPS may be used for HMGP match. Although the use of MIT-PPS as match will be dependent on the timing of applications in both programs. If a MIT-PPS project will be used as HMGP match, include that information and timeline in the application.

12. Is MIT-PPS a part of MIT Resilient Infrastructure Program (MIT-RIP)?

The MIT-PPS program is a separately administered program, though MIT-PPS planning projects may support jurisdictions to prepare and build capacity prior to submitting applications for Round 2 of MIT-RIP, it is not available to support Round 1 of MIT-RIP.

13. If a planning project is awarded to build capacity for Round 2 of MIT-RIP, is that a guarantee of being awarded funding in Round 2 of MIT-RIP?

No, there is no guarantee of being awarded funding in Round 2 of MIT-RIP. Eligible Applicants are encouraged to submit planning projects for MIT-PPS that would enable them to prepare and build capacity in advance of applying for Round 2 of MIT-RIP. However, a funded MIT-PPS planning project is not a guarantee of a future project being funded under Round 2 of MIT-RIP.

14. Does Capacity Building include hiring or training staff?

Capacity building activities under the MIT-PPS program include training staff. Hiring staff is not a Capacity Building activity for the MIT-PPS program. Capacity building activities may be necessary to develop an applicant's policy, planning, and/or management capacity, so that the applicant may be better prepared to pursue Round 2 of the MIT-RIP.

15. Do the projects under the MIT-PPS need to be separate applications?

Yes, separate applications need to be submitted for each project.

16. What are the parameters for Administrative and/or Indirect costs for MIT-PPS?

Administrative costs are not allowed for reimbursement under the program. However, activity delivery costs (ADCs) and indirect costs (ICs) are eligible for reimbursement. ADCs are directly tied to the implementation of the program or activity and are eligible for reimbursement. ADCs include reviewing applications, preparing program guidelines, and answering questions from residents on the program. ICs are costs that associate with organizational costs to make the program available, including salaries of payroll clerk and cleaning crew, cost for rent and utilities, or moveable equipment.

Eligible applicants will be asked to provide an ADC and indirect costs budget, along with, and as part of, their specific project application budget. In addition, if the applicant has an approved Cost Allocation Plan, the applicant must provide a copy if selected to receive an award. At no point can a subrecipient of MIT-PPS funds charge the same costs under multiple categories.

17. How does the reimbursement process work for moveable equipment?

Moveable equipment must be included in the project budget submitted with the application for HCD to review and approve the item(s) as meeting strict criteria that they are used for CDBG-MIT purposes, as well as have a clear tie to mitigation and program requirements. To receive reimbursement for moveable equipment, subrecipients will be required to provide documentation that the committed funds have been used for this specific use. Then subrecipients seeking reimbursement will submit draw requests to HCD that include invoices or receipts (must be approved equipment), procurement documentation (if applicable), and/or lease agreement (if applicable). Please contact HCD to further discuss what qualifies under the different cost types and what costs are eligible for reimbursement under the program.

18. Is an outreach campaign eligible under the MIT-PPS Program?

HCD will need to review the full application, but an outreach campaign is eligible under the MIT-PPS program as a Public Services project if it meets MIT-PPS requirements.

19. Is a planning project related to flooding after a fire disaster and/or a countywide Flood Mitigation Plan eligible for MIT-PPS funding?

Yes, a planning project to address flooding and/or a Flood Mitigation Plan are eligible for MIT-PPS funding. The projects would need to occur in or demonstrate how they serve the MID area.

20. Would an Evacuation Route Plan be eligible under the MIT-PPS program? Specifically, the focus of the Plan includes the area that was part of the disaster.

Yes, it may be eligible. In fact, in order for an evacuation route plan to be eligible for the MIT-PPS program, the applicant would not need limit the scope of the plan to the MID area, but, rather, could address an area that is reasonably related to and/or a reasonable extension of the area affected by the qualifying disaster, so long as the area affected by the disaster is addressed in the evacuation route plan.

21. What are some examples of what HCD is looking for in the requirement: “Upload quantitative data showing a project’s anticipated impact on current and future risks”?

The purpose of the MIT-PPS program is to fund actionable, impactful projects that have measurable results in risk reduction from natural hazards. The quantitative data associated with submitted applications will depend on each project. While a cost benefit analysis is not required, HCD considers projects in terms of how they quantify data and impact on mitigation and resilience. HCD recommends looking at [community lifelines](#) and using them to consider data quantification.

22. We are proposing an Evacuation Planning project, what are some type of data that may be used to measure impact?

A few data sets and measurable impacts to consider includes the following:

- The geographic area the plan serves or changes to the area since the last plan was updated
- Residents and businesses that would require an estimated increase in the number of people that would need to evacuate
- Upgraded and/or added evacuation routes
- The impact of the evacuate and route improvements on warning and time to complete a full evacuation
- Population data and predicted traffic conditions to support how the plan will be used to measure impact

23. Must a project or plan have a direct tie to housing?

No, CDBG-MIT funds do not require a direct tie to housing. However, the MIT-PPS program encourages applicants to consider rebuilding housing as it is included as a recovery activity under the application criteria’s project objectives and priority considerations.

24. What qualifies as capacity building under MIT-PPS for applicants interested in applying for Round Two of MIT-RIP?

Capacity building is designed to support local governments and improve the grantee's ability to build out plans and manage programs. Its primary focus is during the planning phase of project development but does not include hiring staff or allowable costs related to a specific project. Under the MIT-PPS program, the capacity building support is slated to provide access to expertise, support for establishing planning initiatives, or otherwise prime the jurisdiction to manage CDBG-MIT funding prior to applying for MIT-RIP funding.

25. Where and when can I apply for a project or program?

The MIT-PPS program is accepting applications from January 8 through February 19, 2021. MIT-PPS applications will be submitted through HCD's Grants Network system available here: [MIT-PPS NOFA Application](#).

26. Will HCD provide support on application submissions and funding maintenance?

Yes, HCD will provide technical assistance during the application submission period and grant monitoring stages. During the application submission period, applicants are encouraged to sign up for technical assistance using the Office Hour [Excel sign-up form](#). Applicants are encouraged to reach out to HCD to discuss technical assistance needs.

MITIGATION PLANNING AND PUBLIC SERVICES: REFERENCES

[MIT-PPS Policies and Procedures](#): The MIT-PPS Policies and Procedures describe the program requirements, operating procedures, as well as program operation and implementation.

[MIT-PPS NOFA](#): The MIT-PPS NOFA was released on January 8, 2021 and will close on February 19, 2021. The document describes the requirements and process for submitting and application for the MIT-PPS program.

[MIT-PPS NOFA Application](#): The MIT-PPS NOFA application is accessed in Grants Network.

[84 FR 45838](#): The Federal Register Notice contains the overall CDBG-MIT program requirements that provide the fundamental structure of the MIT-PPS program.

Please direct your inquiries to mitigation@hcd.ca.gov. mitigation@hcd.ca.gov