



"Disaster recovery rebuilds the past, Mitigation builds the future."



Community Development Block Grant-Disaster Recovery Hazard Mitigation

Eligibility Determination Workshop

Required Documentation: Phase A

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What is CDBG-DR Mitigation

Mitigation activities are those that increase resilience to future disasters and reduce or eliminate the long term risk of loss of life, injury, damage to and loss to property, and suffering and hardship.

CDBG-DR Mitigation proposed projects for funding must be on the 2025 Guam Hazard Mitigation Plan (HMP) or intend to be placed on the Guam Hazard Mitigation Plan.

HUD National Objective Key Terms

Low to Moderate Income (LMI)

Households making less than 80% of the the median area income. [Guam's three Low-to-Moderate Income Area (LMA) villages based on the 2020 Census are Dededo, Agat, Merizo.] 70% of total CDBG-DR funds must be used to benefit Guam's LMA population.

Removal of Slum/or Blight

Refers to activities in a designated area that either prevent or eliminate conditions of deterioration, such as dilapidated buildings, poor street layouts, and unsafe conditions.

Urgent Need

To qualify under Urgent Need, all the following conditions must be met:

- Conditions pose a serious and immediate threat to the health or welfare;**
- Conditions are of recent origin or recently became urgent (generally, within the past 18 months);**
- The grantee is unable to finance the activity on its own; and**
- Other sources of funding are not available.**

An aerial, grayscale photograph of a river delta. The water flows from the top left towards the bottom right, where it branches into several channels. In the center of the main channel, there is a prominent whirlpool or eddy. The water's surface is textured with ripples and small waves, indicating a strong current. The overall scene is dark and moody, with high contrast between the lighter and darker areas of the water.

CDBG-DR Mitigation Project Priority Framework

Tier I

Projects in LMA municipalities / LMC populations

- Based on the data from The Guam 2020 Census, there are three identified *LMA municipalities; Dededo, Agat, and Merizo.***
- Serving primarily *LMC populations under CDBG-DR presumed benefit such as elderly persons, foster children, or individuals with disabilities; other definitions determined by HUD.***

****Low-Moderate Area benefit (LMA)***

****Limited Clientele (LMC)***

Tier II

Tier III

Tier I

Tier II

Projects that can support LMI Benefit through data analysis

- *Projects that directly benefit low-to-moderate income populations.*
- *Supports projects that are not in one of the LMA villages but can demonstrate direct *LMI benefit through quantifiable data, mapping, or beneficiary documentation.*

- **Low-To-Moderate Income (LMI)*

Tier III

Tier I

Tier II

Tier III

All other projects in the Guam Hazard Mitigation Plan (HMP)

- ***Address critical mitigation needs where LMI benefit cannot be directly measured but the project significantly enhances Guam's preparedness for future disasters.***

Grading Rubric

ORG.

Organizational Capacity (25 points)

Description: Evaluates the applicant's experience, staffing pattern, past performance in similar projects, financial stability, and ability to manage federal funds compliant with CDBG-DR regulations (e.g., procurement, reporting, environmental reviews).

Scoring Levels

- Excellent (22-25 pts): (5+ years) of previous grant experience, clearly identified organizational, sound financial systems, partnerships for capacity gaps.*
- Good (18-21 pts): (3-5 years), adequate staff, some successful projects, financial stability, basic compliance.*
- Fair (13-17 pts): (1-3 years), limited qualifications, minimal relevant experiences, minor financial concerns.*
- Poor (0-12 pts): Little to no experience, unqualified staff, no track record, serious financial/compliance issues.*

Grading Rubric

QUAL.

Quality of Project Description (25 points)

Description: Assesses clarity, completeness, and detail of the proposal, including the problem statement, objectives, methods, expected outcomes, operation and maintenance, and how it addresses hazard mitigation needs.

Scoring Levels

- Excellent (22-25 pts): Clear problem, detailed objectives and methods, measurable outcomes, strong evidence, aligned with mitigation plans.***
- Good (18-21 pts): Mostly clear and complete, reasonable outcomes and data support.***
- Fair (13-17 pts): Basic, somewhat vague, lacks detail or strong rationale.***
- Poor (0-12 pts): Incomplete, disorganized, unclear, lacks essential elements.***

Grading Rubric

Obj.

Alignment with CDBG-DR National Objectives (50 points)

Description: Measures how well the project fulfills one or more of the CDBG-DR national objectives: benefiting low- and moderate-income (LMI) persons ($\geq 51\%$), preventing/eliminating slums/blight, addressing urgent needs, with emphasis on long-term disaster mitigation.

Scoring Levels

- Excellent (42-50 pts): Strong alignment with national objectives (e.g., $\geq 70\%$ LMI benefit), clear data, and compelling mitigation outcomes.***
- Good (31-41 pts): Meets objective (e.g., 51% LMI benefit), sufficient documentation, evident mitigation component.***
- Fair (21-30 pts): Marginal alignment, limited evidence, unclear or weak mitigation link.***
- Poor (0-20 pts): Fails to demonstrate alignment, lacks documentation or mitigation focus.***

An aerial photograph of a large, circular crater or impact site. The crater floor is highly textured with concentric rings and radial patterns, suggesting a complex geological structure. The surrounding terrain is rugged and uneven. The text "Overview of Phases A, B, & C" is overlaid in the center of the image.

Overview of Phases A, B, & C

Phase A: Eligibility Determination

- The proposed activity qualifies as a mitigation project under CDBG-DR requirements.
- The main focus is establishing that the project meets HUD's National Objective and has clear justification tied to reducing future disaster risk.
- It ensures the project aligns with hazard mitigation goals, is supported by documentation, and can move forward into technical assistance.

**Phase B: Feasibility
Determination**

**Phase C: Implementation
& Closeout**

Phase A: Eligibility Determination

Phase B: Feasibility Determination

- It confirms that the project scope, budget, design, and expected outcomes are achievable and well supported.
- Projects must be able to show completion or maintenance plan within the grant performance period (~6 years).
- Projects in flood zones must demonstrate that elevation and drainage improvements are feasible within the CDBG-DR timeline and effectively reduce recurring flood damage.

Phase C: Implementation & Closeout

Phase A: Eligibility Determination

Phase B: Feasibility Determination

Phase C: Implementation & Closeout

- Carry out construction, meeting compliance obligations, and completing closeout documentation.
- It ensures the finished project delivers the intended mitigation benefit and passes final inspection.
- Agencies must submit required progress and closeout reporting or monitoring agreement plan.

An aerial photograph of a large, dark, circular crater or depression in a rugged, rocky landscape. The crater is the central focus, with concentric ridges and a dark interior. The surrounding terrain is uneven and rocky, with various shades of gray and black. The text "Phase A: Eligibility Determination" is overlaid in white, bold, italicized font across the center of the image.

Phase A: Eligibility Determination

A1. HUD'S NATIONAL OBJECTIVE

- **EACH PROPOSED PROJECT MUST MEET ONE OF HUD'S NATIONAL OBJECTIVES, WHICH ARE THE CORE ELIGIBILITY CRITERIA FOR ALL CDBG-DR MITIGATION ACTIVITIES.**
- **THIS REQUIREMENT ENSURES THE PROJECT EITHER SERVES LOW- TO MODERATE-INCOME (LMI) PERSONS OR COMMUNITIES, ADDRESSES AN URGENT NEED, OR ELIMINATES UNSAFE OR DETERIORATED CONDITIONS.**
- **BY MEETING A NATIONAL OBJECTIVE, THE PROJECT DEMONSTRATES A CLEAR MITIGATION PURPOSE AND ENSURES COMPLIANCE WITH FEDERAL STANDARDS.**

A2. PROJECT NARRATIVE/PROJECT ABSTRACT

THE PROJECT NARRATIVE PROVIDES A CLEAR, DETAILED DESCRIPTION OF WHAT YOUR AGENCY INTENDS TO BUILD, RETROFIT, OR HARDEN UNDER THE MITIGATION PROGRAM.

1

IT INCLUDES A SUMMARY OF EXISTING SITE CONDITIONS, THE HAZARD-RELATED PROBLEM YOU ARE ADDRESSING, AND YOUR PROPOSED SOLUTION TO REDUCE THAT RISK.

2

IT OUTLINES MAJOR TASKS, ANTICIPATED OUTCOMES, AND HOW THE PROJECT WILL STRENGTHEN COMMUNITY RESILIENCE. IT ALSO BUILDS THE MAINTENANCE OF MONITORING THROUGHOUT THE MITIGATION PROCESS.

3

THIS DOCUMENT IS ESSENTIAL BECAUSE IT GUIDES COST ESTIMATING, ENVIRONMENTAL REVIEW, PROCUREMENT PLANNING, AND TECHNICAL VALIDATION LATER IN THE PROCESS.

4

A3. SITE CONTROL NOTES

- **SITE CONTROL NOTES PROVIDE DOCUMENTATION SHOWING THAT YOUR AGENCY HAS THE AUTHORITY, PERMISSION, OR LEGAL ABILITY TO USE THE PROPOSED PROJECT SITE.**
- **CLEAR SITE CONTROL IS NECESSARY TO ADVANCE ENVIRONMENTAL REVIEW AND VERIFY THAT THE PROJECT CAN LEGALLY OCCUR AT THE PROPOSED LOCATION.**
- **A FORMAL CONTRACT, AGREEMENT, OR OTHER LEGAL DOCUMENT ESTABLISHING SITE CONTROL MUST BE PROVIDED.**
- **THE PROJECT WILL NOT PROGRESS WITHOUT SITE CONTROL BEING CLEARLY DEMONSTRATED AND ENVIRONMENTAL REVIEW COMPLIANCE COMPLETED.**



A4. HMP CONSISTENCY & OCD COORDINATION LETTER

***A4. (a) Including Intention Process for projects not currently listed in the
Guam Hazard Mitigation Plan***

THIS ITEM CONFIRMS YOUR PROJECT IS CONSISTENT WITH THE GUAM HAZARD MITIGATION PLAN (HMP), OR DOCUMENTS YOUR INTENTION TO ALIGN THE PROJECT THROUGH OCD.

IT INCLUDES THE SPECIFIC HMP GOAL, OBJECTIVE, OR ACTION ID THAT SUPPORTS YOUR PROPOSED ACTIVITY, ALONG WITH A BRIEF STATEMENT EXPLAINING THE ALIGNMENT.

ESTABLISHING HMP CONSISTENCY EARLY STRENGTHENS THE MITIGATION RATIONALE AND ENSURES FEDERAL ALIGNMENT WITH LONG-TERM RISK REDUCTION STRATEGIES.

A5. ESTIMATED COSTS

1

THE PROJECT MUST INCLUDE AN EARLY COST ESTIMATE THAT OUTLINES ANTICIPATED EXPENSES FOR MAJOR COMPONENTS OF THE PROPOSED MITIGATION ACTIVITY.

2

THESE COST ESTIMATES HELP VALIDATE PROJECT SCOPE, ENSURE BUDGET REALISM, AND SUPPORT FEASIBILITY ANALYSIS DURING PHASE B.

A6. ORGANIZATIONAL CAPACITY & FINANCIALS

- **THIS SECTION PROVIDES PROOF THAT YOUR AGENCY HAS THE FINANCIAL STABILITY AND STAFFING CAPACITY TO MANAGE FEDERAL MITIGATION FUNDS RESPONSIBLY.**
- **REQUIRED ITEMS INCLUDE THE MOST RECENT SINGLE AUDIT OR A SMALL-ENTITY EXEMPTION CERTIFICATION, FINANCIAL STATEMENTS, RESUMES OF KEY STAFF, ORGANIZATIONAL ROLES, AND/OR PAST FEDERAL GRANT EXPERIENCE.**
- **IF YOUR AGENCY HAS PRIOR AUDIT FINDINGS, INCLUDE THE CORRECTIVE ACTION PLAN TO SHOW HOW ISSUES WERE ADDRESSED.**
- **GHURA CDBG-DR USES THIS INFORMATION FOR RISK ASSESSMENT AND TO DETERMINE MONITORING NEEDS.**



***A7. Duplication of Benefits (DOB)
Worksheet***

THIS REQUIREMENT ENSURES THE AGENCY IS NOT AWARDED TWICE FOR THE SAME WORK. GHURA DOES NOT PROVIDE REIMBURSEMENTS FOR COSTS INCURRED BEFORE A SUBRECIPIENT AGREEMENT OR CONTRACT IS EXECUTED. THIS HELPS DETERMINE THE ELIGIBLE CDBG-DR AWARD AMOUNT.

IT INCLUDES ALLOWABLE USES, A DOB ATTESTATION, AND THE CALCULATION OF REMAINING UNMET NEED.

PUBLIC ASSISTANCE ISN'T THE ONLY FORM OF DOB. ALL OTHER FUNDING YOUR AGENCY HAS RECEIVED OR EXPECTS TO RECEIVE SUCH AS FEMA PUBLIC ASSISTANCE, INSURANCE PROCEEDS, BONDS OR OTHER FEDERAL OR LOCAL GRANTS, OR FUNDING.



A8. Environmental Review Input

THE ENVIRONMENTAL REVIEW IS MANDATORY FOR EVERY PROJECT. NO PROJECT CAN ADVANCE TO FEASIBILITY, DESIGN, OR CONSTRUCTION UNTIL ENVIRONMENTAL CLEARANCE IS ISSUED.

IF YOUR AGENCY ALREADY HAS ENVIRONMENTAL ASSESSMENTS OR RELATED DOCUMENTATION, PLEASE SUBMIT THEM. EXISTING MATERIAL SUCH AS FEMA ENVIRONMENTAL ASSESSMENTS OR SIMILAR FEDERAL ENVIRONMENTAL REVIEWS, MAY NEED TO BE REVIEWED TO SUPPORT CDBG-DR ENVIRONMENTAL REQUIREMENTS.

***PREVIOUSLY COMPLETED ENVIRONMENTAL ASSESSMENTS MAY BE USED IF THEY ARE STILL VALID (GENERALLY WITH THE LAST 5 YEARS) AND IF CONDITIONS HAVE NOT SUBSTANTIALLY CHANGED.**

GHURA WILL COMPLETE THE ENVIRONMENTAL REVIEW FOR ALL MITIGATION PROJECTS. THIS ENSURES CONSISTENCY WITH HUD REGULATIONS AND PREVENTS DELAYS CAUSED BY INCOMPLETE OR INACCURATE SUBMISSIONS.

A9. SHPO/THPO & AGENCY CONSULTATION MATERIALS (IF APPLICABLE)

1

CONSULTATION MATERIALS ARE REQUIRED WHEN A PROJECT MAY AFFECT CULTURAL, ARCHAEOLOGICAL, OR HISTORIC RESOURCES UNDER SECTION 106.

2

AGENCIES MUST PROVIDE ANY AVAILABLE SITE MAPS, PHOTOS, GROUND-DISTURBANCE DESCRIPTIONS, AND DOCUMENTATION OF PRIOR SITE DEVELOPMENT.

3

IF YOUR AGENCY HAS EXISTING CORRESPONDENCE, ASSESSMENTS, OR PAST CONSULTATION DOCUMENTS, PLEASE SUBMIT THEM.

A10. OPERATIONS & MAINTENANCE PLAN

- **THIS PLAN DEMONSTRATES THAT YOUR AGENCY HAS LONG-TERM STRATEGIES AND COMMITMENTS IN PLACE TO OPERATE AND MAINTAIN THE ASSET AFTER PROJECT COMPLETION.**
- **DOCUMENTATION MAY INCLUDE DEEDS, LONG-TERM LEASES, RIGHT-OF-ENTRY AGREEMENTS, EASEMENTS, MOUS, MAYORAL AUTHORIZATIONS, MAINTENANCE PLAN, OR MASTER-DEVELOPER AGREEMENTS IF APPLICABLE.**
- **HUD REQUIRES PROOF OF DURABLE SITE CONTROL AND MAINTENANCE CAPABILITY BEFORE OBLIGATING FUNDS OR ENTERING CONTRACTS.**
- **CLEARLY OUTLINES WHETHER THE AGENCY HAS AVAILABLE FUNDING FOR ONGOING OPERATIONS AND MAINTENANCE, OR IDENTIFIES THE FUNDING SOURCE THAT WILL SUPPORT LONG TERM UPKEEP.**

A11. Procurement & Compliance Plan



A CLEAR PROCUREMENT PLAN ENSURES TRANSPARENCY, PREVENTS CONFLICTS, AND SUPPORTS COMPLIANT PROJECT IMPLEMENTATION.

THIS DOCUMENT ALSO INCLUDES YOUR AGENCY'S SOP FOR REPORTING PROCUREMENT ACTIVITIES AND TIMELINES.

IT INCLUDES PROCUREMENT METHODS, THRESHOLDS, COMPETITIVE REQUIREMENTS, CONFLICT-OF-INTEREST RULES, FEDERAL CONTRACT CLAUSES, DISADVANTAGED BUSINESS OUTREACH STRATEGIES, AND RECORDKEEPING PROCEDURES.

***COI MUST BE ESCALATED TO HUD FOR APPROVAL**

THE PROCUREMENT & COMPLIANCE PLAN OUTLINES YOUR AGENCY'S PROCESS FOR PURCHASING GOODS AND SERVICES IN COMPLIANCE WITH 2 CFR 200, CDBG-DR PROCUREMENT POLICY AND APPLICABLE LOCAL PROCUREMENT LAWS.

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Questions?





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