

Amendment 1- Non-Substantial

October 26, 2022

The State of Iowa is submitting Amendment 1, a non-substantial amendment, to HUD for its 2020 CDBG-DR program. This amendment is being submitted based upon feedback from cross-cutting partners at HUD to better align the plan's compliance with HUD expectations on fair housing and environmental justice. The State is also making a few technical corrections to programs, including the scoring criteria, descriptions, and funding amounts-based upon ensuring the programs operate efficiently in addressing unmet needs from the derecho.

This amendment is non-substantial as it does not meet the 2020 Derecho CDBG-DR Action Plan definition of a substantial amendment. That definition is as follows:

A change to this Action Plan is considered substantial if it meets the following criteria:

- *A change in program benefit or eligibility criteria,*
- *The addition or deletion of an activity*
- *The allocation or reallocation more than \$5 million or greater of a program budget, and*
- *A proposed change to an adopted method of distribution*

Proposed Changes

See the proposed changes to the Action Plan in the table on the following page:



Section	Description
2.2.4	<p>Incorporated revisions as required by HUD Fair Housing & Equal Opportunity (FHEO) in</p> <ol style="list-style-type: none"> 1. Providing an assessment of the potential unjustified discriminatory effects on or failure to benefit vulnerable populations and racial and ethnic communities in proportion to their needs 2. Including required data on number & percentage of persons belonging to Federally protected classes under the Fair Housing Act (race, color, national origin, sex, sexual orientation, gender identity, familial status, and disability); indigenous populations and tribal communities; racially and ethnically concentrated areas of poverty; and historically distressed and underserved communities. 3. Describes how the State of Iowa will ensure that subrecipients comply with their federal fair housing and nondiscrimination requirements
3.3	<p>Added language recommended by the HUD Office of Environment & Energy specifying that projects shall consider water & resource efficiencies, improved air quality filtration, and enhanced Operation & Maintenance plans. All of which is currently covered by the Iowa Green Streets Criteria.</p>
3.6 & 3.8	<p>Added language recommended by the HUD Office of Environment & Energy affirming that projects will consider HUD's new Environmental Assessment Factors eGuide on Climate Change</p>
4.10.1.1	<p>Clarified affordability period for single-family homes built for new construction to the definition included elsewhere in the action plan</p>
4.10.1.4	<p>Update to scoring criteria, clarified that interior rehabilitation work as an eligible activity</p>
4.10.2.1,	<p>Update to scoring criteria, increased per tree planted or stump removed incentive from \$600 to \$1,000 per unit.</p>
4.2, 4.7, 4.10.1.2, 4.10.1.3, 4.10.2.2, 4.10.2.3	<p>Typo and spelling corrections, edits for per tree unit to \$1,000 per unit maximum award</p>



Steven Stransky

From: Wilkerson, Jo A <Jo.A.Wilkerson@hud.gov>
Sent: Saturday, October 29, 2022 8:21 AM
To: Steven Stransky
Cc: Foulds, Phyllis J
Subject: HUD Acknowledgement of Action Plan Amendment 1 - Non-Substantial for State of Iowa's 2020 CDBG-DR Grant

Dear Steven,

This email serves as acknowledgement of Action Plan Amendment (APA) – Non-substantial for the State of Iowa 2020 CDBG-DR grant.

The purpose of the APA 1 is to make the following changes to the 2020 Action Plan:

Section 2.24

Incorporated revisions as required by HUD Fair Housing & Equal Opportunity (FHEO) in:

- Providing an assessment of the potential unjustified discriminatory effects on or failure to benefit vulnerable populations and racial and ethnic communities in proportion to their needs
- Including required data on number & percentage of persons belonging to Federally protected classes under the Fair Housing Act; indigenous populations and tribal communities; racially and ethnically concentrated areas of poverty; and historically distressed and underserved communities.
- Describes how the State of Iowa will ensure that subrecipients comply with their federal fair housing and nondiscrimination requirements

Section 3.3

- Added language recommended by the HUD Office of Environment & Energy specifying that projects shall consider water & resource efficiencies, improved air quality filtration, and enhanced Operation & Maintenance plans. All of which is currently covered by the Iowa Green Streets Criteria.

Section 3.6 & 3.8

- Added language recommended by the HUD Office of Environment & Energy affirming that projects will consider HUD's new Environmental Assessment Factors eGuide on Climate Change

Section 4.10.1.1

- Clarified affordability period for single-family homes built for new construction to the definition included elsewhere in the action plan

Section 4.10.1.4

- Update to scoring criteria, clarified that interior rehabilitation work as an eligible activity

Section 4.10.2.1

- Update to scoring criteria, increased per tree planted or stump removed incentive from \$600 to \$1,000 per unit.

Section 4.2, 4.7, 4.10.1.2, 4.10.1.3, 4.10.2.2, 4.10.2.3

- Typo and spelling corrections, edits for per tree unit to \$1,000 per unit maximum award

HUD acknowledges that the APA is non-substantial in accordance with the requirements in the State's 2020 Acton Plan. The State is not changing a program benefit or eligibility criteria; adding or deleting an activity; allocating or reallocating more than \$5 million or greater of a program budget; or proposing a change to an adopted method of distribution.

Thank you.

Jo Ann Wilkerson

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