

Spokane County

Housing and Community Development Department

Community Development Block Grant – Disaster Recovery (CDBG-DR) Award for Presidentially Declared Disaster (4759) – 2023 Oregon Road and Gray Road Fires

Administrative Action Plan

Purpose: This document is Spokane County's Administrative Action Plan for Program Administrative Costs (PACs) for the proposed use of administrative funds allowed under the Community Development Block Grant – Disaster Recovery (CDBG-DR) allocation made available through the United States Department of Housing and Urban Development (HUD) under the Press Release HUD No. 25-004.

Grantee Name:	Spokane County, State of Washington
Date Plan Submitted:	1/31/2025
Total Grant Amount:	\$44,152,000.00
Total Amount of PACs Budgeted:	\$2,207,600.00 (5% of \$44,152,000.00)
Grantee Contact (Name):	George Dahl, HCD Administrator Spokane County 1116 W. Broadway Ave Spokane, WA 99260
Grantee Contact (Email/Phone):	gdahl@spokanecounty.org 509-477-4488
HUD Contact (Name):	Stefania Appia, Community Planning and Development Representative for Disaster Recovery (CDBG-DR) U.S. Department of Housing and Urban Development
HUD Contact (Email/Phone):	Stefania.m.appia@hud.gov 771-202-3279

I. Background:

HUD's Federal Register notice governing these grants requires grantees to use the Disaster Recovery Grant Reporting (DRGR) system to submit their Action Plans for the full amount of the grant, but to expedite access to administrative funds, grantees will follow a different process.

If a grantee chooses to access funds for program administrative costs prior to the Secretary's certification, it must first prepare an Administrative Action Plan (AAP) outside of DRGR, describing its use of funds for only program administrative costs. It is for that purpose that the County, as the grantee, is submitting this AAP to HUD. This plan to access grant funds for program

administrative costs is being submitted to HUD prior to submitting the Action Plan for the full CDBG-DR grant in DRGR. Per HUD's January 2025 Federal Register's Consolidated Notice, a grantee should consider the entire lifecycle of the award (approximately six years). The County has calculated its need to cover program administrative costs, creating a reasonable budget.

The amount budgeted for program administrative costs includes anticipated expenditures for county staff to work on this program. These funds include staff salaries (direct and indirect costs), travel, equipment, supplies, ongoing needed training, and other necessary and proper uses of funds as needed for management and oversight of the grant program during the life cycle of the grant. Staff work includes, but is not limited to, program design; drafting the County's plans and any substantial amendment(s); drafting and publishing notices of public hearings, plans and notices online on the County's Disaster Recovery webpage; conducting public hearings and community outreach; conducting training workshops that include grant application and compliance requirements; providing technical assistance to grantees and sub recipients; processing grant award documents and requests for payment of grant funds; monitoring local projects for program compliance; closing out open grants; maintaining records per the County's Record Retention requirements; drafting and submitting quarterly and annual progress reports to HUD; and participating in federal monitoring visits conducted by HUD.

II. Public Notices and Comment Period:

As part of the Federal Register's Consolidated Notice under Docket No. FR-6489-N-01 of 90 FR 1754 subsection I.B.2, a public comment period and associated publications for the AAP is not required. This provision is to create a more streamlined process and timely awarding of the grant. Therefore, Spokane County will post a copy of the AAP on the County's Disaster Recovery webpage as required upon submission. The link to the website can be found here: [Disaster Recovery Home | Spokane County, WA.](#)

III. Proposed Allocation of Funds:

Spokane County plans to incur pre-award administrative costs prior to submitting an Action Plan in DRGR, which includes general grant administrative duties, program design, meetings with community stakeholders, technical assistance, program compliance, reporting, and other related items. This is inclusive of the County's personnel costs and the approved indirect costs rate. No more than 5% of the overall grant award (\$2,207,600) will be allocated to Program Administrative Costs (PACs).

IV. Criteria for Eligibility:

For eligibility, the County may include activities listed at Section 105(a)(13) of the HCDA, as well as activities spelled out in 24 CFR 570.206.

V. Certifications & Standard Form 424 (SF-424):

The County, having chosen to submit an AAP, makes the following certifications that are listed in Appendix A of the Federal Register's Consolidated Notice and has included these certifications with the submission of this Plan.

a. **Compliance with Anti-discrimination Laws:** The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

b. **Affirmatively Further Fair Housing:** The grantee certifies that it will affirmatively further fair housing.

c. **Anti-Lobbying:** The grantee certifies its compliance with restrictions on lobbying required by 24 CFR 87, together with disclosure forms, if required by part 87.

d. **Authority of Grantee:** The grantee certifies that the Admin Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

e. **Consistency with the Action Plan:** The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its Admin Action Plan.

f. **Citizen Participation:** The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

g. **Use of Funds:** The grantee certifies that it is complying with each of the following criteria:

(1) Purpose of the Funds. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

(2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Admin Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

(4) Special Assessment. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) the grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of

moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

h. **Excessive Force:** The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:

(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

(2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

i. **Grant Timeliness:** The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

j. **Environmental Requirements:** The grantee certifies that it will comply with environmental requirements at 24 CFR 55 (as applicable) and 24 CFR 58.

k. **Compliance with Laws:** The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Scott Simmons

Signature of Certifying Officer

Scott Simmons, CEO

(Printed Name of Certifying Officer)

1/31/25

Date