



City of Little Rock, Arkansas
2023 Community Development Block Grant Disaster Recovery (CDBG-DR)
Program Administrative Costs Action Plan

I. Background:

The purpose of the Program Administrative Costs (PACs) Action Plan for the 2023 Community Development Block Grant – Disaster Recovery (CDBG-DR) is to begin using funds for allowable administrative activities prior to the submission of the full program Action Plan at a later date. This will allow City of Little Rock as the administering agency to initiate planning activities, procure, and utilize consulting assistance for the creation of the CDBG-DR Action Plan, and general administrative assistance for the program.

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| Grantee Name: | City of Little Rock |
| State: | Arkansas |
| Date Plan Submitted: | March 14, 2025 |
| Total Grant Amount: | \$20,895,000 |
| Amount of Administrative Funds Budgeted: | \$1,044,750 |
| Grantee Contact (Name): | Kevin Howard |
| Grantee Contact (Email/Phone): | khoward@littlerock.gov 501-371-6825 |
| HUD Contact (Name): | David Blick |
| HUD Contact (Email/Phone): | David.G.Blick@hud.gov 501-918-5706 |

II. Proposed Allocation of Funds

The Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118-158) allocated \$20,895,000 in disaster recovery and mitigation funding to City of Little Rock for jurisdictions. Up to 5% (\$1,044,750) of the total allocation may be used for the administration of the program. Administration costs are necessary to support expenses related to administrative activities and include Action Plan development, community engagement, overall grant management, compliance and monitoring, and other costs specified as eligible administrative expenses in 24 CFR 570.206. Per the federal

regulations, grantees may include activities listed at Section 105 (a)(13) of the HCDA, as well as activities spelled out in 24 CFR 570.206. Under the PACs Action Plan City of Little Rock is proposing to receive access to the full 5% or \$1,044,750 for the following allowable administrative activities:

| Program Administration Activity | Budget/ Allocation |
|--|-----------------------|
| <p>Total (Amount up to 5% of grant total)</p> <ul style="list-style-type: none"> • Staff time, administrative costs, and consulting fees associated with the development, oversight and management of the Action Plan and general CDBG-DR grant set-up including financial certifications, capacity assessment, and implementation plan. • Staff time, administrative costs, and other expenses associated with the development of the request for proposal (RFP) documentation to procure a qualified third-party to assist with the development of the Action Plan and the administration of the grant program. Advertising and publication costs associated with the solicitation may be included. • Staff time, administrative costs and other expenses associated with activities and services for Action Plan drafting, public engagement, and technical assistance support. • Staff time, administrative costs, and other expenses associated with the design, development, review and implementation of resilience and recovery programs and activities. | <p>\$1,044,750</p> |

III. Publication of the Admin Action Plan

Grantees must publish the proposed action plan for program administrative costs, and substantial amendments to the plan, for public comment. To permit a more streamlined process, HUD waived the provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707.24, 24 CFR 570.486, 24 CFR 1003.604, 24 CFR 91.105(b) through (d), and 24 CFR 91.115(b) through (d), with respect to citizen participation requirements. Instead, the manner of publication of the action plan for program administrative costs must include prominent posting on the grantee’s official disaster recovery website and includes any substantial amendments to the Admin Action plan.

This Program Administrative Costs Action Plan has been published on the City CDBG-DR website on March 13, 2025.

IV. Certifications and Standard Form 424 (SF-424):

City of Little Rock, as the HUD grantee, makes the following certifications:

- 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.

