

Fair Housing Considerations in
CDBG-DR Action Plan Development
Grantee Guide and Resources



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Introduction

This document provides recommendations and examples to help recipients of Community Development Block Grant Disaster Recovery (CDBG-DR) funding effectively prepare the fair housing and civil rights-related elements of CDBG-DR Action Plans.¹ This document does not establish new requirements. Instead, it provides a logical framework for performing an Action Plan's required fair housing and civil rights components under the 2022 Consolidated Notice governing CDBG-DR allocations,² while recognizing that grantees may present their fair housing and civil rights analysis in accordance with their local needs and circumstances. This document also aims to provide grantees with potential data sources—compiled in the Appendix section—that may be helpful in understanding their community and in fulfilling data and analysis requirements to meet civil rights obligations.

Disasters impact people differently based on the communities where they live, and recovery efforts should take those differences into account. Housing is more than the roof over one's head, and research has shown that community is a powerful predictor of social mobility.³ Where a person lives determines whether they have access to healthy, safe living environments, high-quality education, employment opportunities, and responsive municipal and commercial services. Communities facing entrenched disparities from the legacy of discrimination and segregation, redlining, exclusionary zoning, and other discriminatory land use decisions often also face environmental justice concerns⁴ and suffer from disinvestment in infrastructure that makes them more susceptible to the effects of disasters. A strategic, data-driven approach to using CDBG-DR funding can help avoid perpetuating disparities and reduce inequities as communities recover.

¹ Grantees use Action Plans to describe their disaster recovery or mitigation program. The Action Plan includes a needs assessment, community and stakeholder engagement, and identification of activities that the grantee will undertake under its recovery or mitigation program. Action Plans also detail funding amounts, sources of other funds, and implementation partners.

² The U.S. Department of Housing and Urban Development (HUD) published 87 FR 6364 on February 3, 2022, 87 FR 31636 on May 24, 2022, and 88 FR 3198 on January 18, 2023. These Notices combine “allocation-specific” requirements in the Allocation Announcement Notice (AAN) and “consolidated requirements” in the CDBG-DR [Consolidated Notice](#) (Appendix B of the Notices). The Consolidated Notice governs disasters since 2020 and will be in effect for all CDBG-DR funding until superseded by subsequent guidance.

³ Chetty, R., Jackson, M.O., Kuchler, T. et al. (2022). Social capital II: determinants of economic connectedness. *Nature* 608, 122–134.

Chetty, R., Hendren, N., Jones, M. R., & Porter, S. R. (2020). Race and economic opportunity in the United States: An intergenerational perspective. *The Quarterly Journal of Economics*, 135(2), 711-783.

DeLuca, Stefanie, Susan Clampet-Lundquist, and Kathryn Edin (2016). *Coming of Age in the Other America*. Russell Sage Foundation.

⁴ [Executive Order \(EO\) Revitalizing Our Nation's Commitment to Environmental Justice for All](#) calls on the Federal government to ensure that protected class groups and underserved communities do not face disproportionate environmental burdens. Accordingly, it requires Federal agencies to identify and address barriers that prevent equitable access to human health and environmental benefits, including those related to natural disaster recovery and climate mitigation, adaption, and resilience. Consistent with this order, this guidance provides grantees with tools and resources to incorporate equity and environmental justice into their recovery Action Plans.

Civil Rights Authorities

Grantees must use their CDBG-DR funding in a manner that complies with fair housing and civil rights laws, including Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and Section 109 of Title I of the Housing and Community Development Act of 1974.⁵

The Fair Housing Act prohibits discrimination in the sale, rental, and financing of dwellings and other real estate-related transactions because of race, color, religion, sex (including gender identity and sexual orientation), national origin, disability, and familial status. In addition to prohibiting intentional discrimination, the Fair Housing Act protects individuals from facially neutral policies, practices, and programs that have a discriminatory effect on protected groups, even if the result was not intentional.⁶ The Fair Housing Act also requires HUD and recipients of HUD funds to take meaningful actions that, taken together, address significant disparities in housing needs and access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially or ethnically concentrated areas of poverty into areas of opportunity, and foster and maintaining compliance with civil rights and fair housing laws.⁷ This is known as “**affirmatively further fair housing**” or “**AFFH**.”

Title VI prohibits discrimination based on race, color, and national origin in programs or activities that receive federal financial assistance. HUD’s regulations implementing Title VI also prohibit recipients from, either directly or through contractual or other arrangements, using criteria or methods of administration that have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity as respect to persons of a particular race, color, or national origin.⁸ Title VI also requires that grantees take reasonable steps to ensure meaningful access for individuals with limited English proficiency (LEP).

Section 109 prohibits discrimination based on race, color, national origin, and sex (including gender identity and sexual orientation) in activities funded through CDBG grants.

Section 504 prohibits discrimination based on disability in programs or activities that receive federal financial assistance. HUD’s regulations implementing Section 504 also require grantees to take appropriate steps to ensure effective communication with individuals with disabilities.⁹ The **Americans with Disabilities Act (ADA)** likewise prohibits discrimination based on disability and is applicable regardless of federal financial aid. Title II of the ADA covers public entities’ programs, activities, and services, while Title III prohibits discrimination in places of public accommodations owned, leased, or operated by private entities.

⁵ See [Fair Housing and Related Laws](#) for a full list of fair housing-related statutes, regulations, and executive orders.

⁶ [24 CFR Part 100 Subpart G](#); [88 FR 19450](#)

⁷ 24 CFR 5.150

⁸ 24 CFR 1.4(b)(2)(i)

⁹ 24 CFR 8.6(a)



Impact and Unmet Needs Assessment

Protected Classes, Vulnerable Populations, and Underserved Communities

Under the Consolidated Notice, grantees must incorporate an analysis of **protected classes**, **vulnerable populations**, and **underserved communities** into their Action Plan. To meet this requirement, grantees should understand how CDBG-DR uses these three terms and their common differences.

Protected classes are groups protected from discrimination under federal civil rights law based on the following:

- Race
- Color
- National origin
- Sex (including sexual orientation and gender identity)
- Religion
- Familial status
- Disability
- Age

Vulnerable populations, as defined in the Consolidated Notice, are groups or communities “whose circumstances present barriers to obtaining or understanding information or accessing resources.”¹ There is no standard set of vulnerable populations; grantees should name which groups are considered vulnerable for their jurisdiction. The intersectionality of characteristics that can make people vulnerable varies locally and regionally by:

- Geography
- Markets
- Prevalent housing stock and tenure
- History
- Prejudice
- Policy

Underserved communities, as defined in the Consolidated Notice, are “populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life.”¹ Underserved communities may overlap with protected classes and vulnerable populations due to historical and systemic patterns regarding the lack of engagement, mistreatment, and barriers to participation.

While overlap exists among protected classes, vulnerable populations, and underserved communities, this analysis must adequately address each group's recovery needs to meet the requirements of the Consolidated Notice. Moreover, failure to adequately address the recovery needs of protected class groups may result in issues with compliance with fair housing and civil rights laws.

Data Collection

Data collection is a critical part of the development of an Action Plan. It is also essential in addressing the Consolidated Notice's fair housing and civil rights requirements. Data enables grantees to better understand local and regional conditions in each stage of disaster recovery. Moreover, analyzing relevant data can clarify the recovery needs of protected groups, vulnerable populations, and underserved communities and reveal how a disaster has worsened inequities. By looking at data across a range of demographics and community conditions (such as education, health, housing, and income), grantees can better understand disparities in their communities and how they impact residents.

The Consolidated Notice requires grantees to include data for the HUD-identified and grantee-identified "most impacted and distressed" (MID) areas to show the following information as it is available:¹⁰

- **Racial and ethnic make-up** of the population, including relevant subpopulations depending on activities and programs outlined in the plan;
- **Populations with limited English proficiency (LEP)**, including the number and percentage of each identified group;
- Number and percentage of **persons with disabilities**;
- Number and percentage of **persons belonging to protected classes** under the Fair Housing Act: race, color, national origin, religion, sex (which includes sexual orientation and gender identity),¹¹ familial status, and disability, age under the Age Discrimination Act, and **other vulnerable populations** as determined by the grantee;
- **Indigenous populations and tribal communities**, including the number and percentage of each identified group;
- **Racially and ethnically concentrated areas and concentrated areas of poverty**;¹² and
- **Historically distressed and underserved communities.**

¹⁰ Consolidated Notice, III.C.1.d. "... Grantees should identify those populations (i.e., which protected class, vulnerable population, and historically underserved groups were considered) and... must include data for the HUD-identified and Grantee-identified MID areas that identifies the following information, as it is available..."

¹¹ [Executive Order 14075](#) (Advancing Equality for Lesbian, Gay, Bisexual, Transgender, and Intersex Individuals) requires collection of sexual orientation, gender identity, and sex characteristics (SOGI data).

¹² To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. For racial/ethnic concentration, the census tract must have a non-white population of 50 percent or more. Regarding the poverty threshold, neighborhoods of extreme poverty are census tracts with 40 percent or more of individuals living at or below the poverty line, or if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are designated R/ECAPs. See HUD's webpage on [Racially or Ethnically Concentrated Areas of Poverty \(R/ECAPs\)](#) for additional information and resources for identifying these areas.

Grantees can use a variety of data sources to develop their Action Plans. Federal government data sources such as the most recent U.S. Census, American Community Survey (ACS), and FEMA data should be primary sources. Grantees may also supplement federal sources with relevant local data and knowledge, including information gathered during community participation and through consultation with local, state, or regional planning departments, academics, or others with knowledge of the local area. Grantees should specify in their Action Plan if data is unavailable for any required groups.

The most useful way to interact with data in an Action Plan is through a variety of tables, maps, and other visualizations. Data visualizations allow stakeholders to understand information quickly. Grantees may need to provide data at a smaller scale (e.g., census block group, census tract, town, neighborhood) to accurately identify concentrations of protected classes and locations of natural hazards. Adding a narrative of the visualizations will strengthen the Action Plan analysis and can highlight how populations intersect:

Example: Data Narrative

Most census block groups in the State range from 0% to 20% communities of color. These communities are concentrated in the center of the State, near the largest three cities. In these block groups, the largest populations are Hispanic/Latino and Black/African American. The Cherokee reservation additionally borders the State to the east, with the Cherokee, the largest Native American group, represented in the geographic area as well. This group represents 60% of the total population and 5% of the entire Native American population in the State. Primary languages spoken in the impacted area include English (75%), Spanish (12%), Vietnamese (5%), and Other (2%). Over twelve percent (12%) of residents report speaking English “less than very well,” the most significant percentage of such persons across the disaster-declared counties. Furthermore, Spanish is the language most consistently spoken at home by persons speaking English “less than very well.”

Several areas of the State have a high concentration of high-poverty populations. Data indicates that the Native American and Black/African American groups, in addition to communities with disabilities, experience poverty rates ten times higher than the White non-disabled population. The Hispanic/Latino population experiences high-poverty rates seven times higher than the White population. In total, 17.6% of the population are persons with a disability, concentrated near the largest three cities. Of this population, 10% are elderly disabled, with the remaining 5% reporting a physical disability and 2.6% reporting a mental disability.

Tables are highly effective for displaying both summary and detail values, such as showing race and ethnicity demographics across the HUD-identified MID area, the grantee-identified MID area, and other relevant geographies. The following example compares racial and ethnic data across four MID areas by number and percentage. The table also identifies whether the area is part of the HUD-identified MID or grantee-identified MID and provides the source of the data:

Example: Using Tables

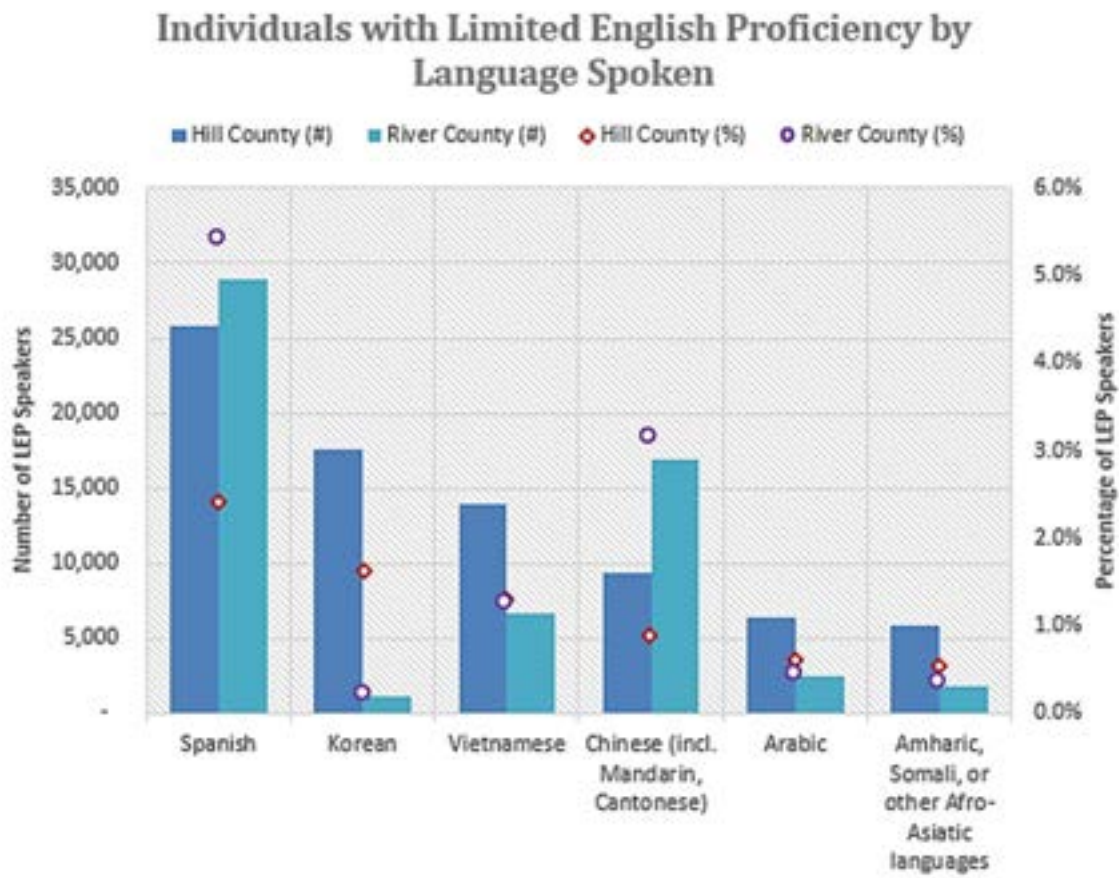
Race/Ethnicity	Green County (HUD MID)	Green County (HUD MID)	Purple County (HUD MID)	Purple County (HUD MID)	Orange County (State MID)	Orange County (State MID)	Pink County (State MID)	Pink County (State MID)
	#	%	#	%	#	%	#	%
Total Population	968,738	100%	1,355,683	100%	1,481,364	100%	325,213	100%
White alone	510,754	53	799,547	59	991,862	67	204,650	63
Hispanic or Latino	241,442	25	230,740	17	290,261	20	58,036	18
Black or African American alone	130,047	13	150,627	11	105,591	7	36,313	11
American Indian/ Alaska Native alone	1,527	0	1,353	0	2,409	0	345	0
Asian alone	58,651	6	138,755	10	59,874	4	19,376	6
Native Hawaiian/ Other Pacific Islander alone	212	0	207	0	339	0	22	0
Other race alone	6,352	1	8,502	1	5,853	0	1,559	1
Two or more races	19,753	2	25,952	2	25,175	2	4,912	2

Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table DP05 – “ACS Demographic and Housing Estimates”

Charts may help reveal patterns and trends beyond the collection and documentation of demographics, such as comparing LEP rates by language spoken. The following chart contains the number and percentage of LEP individuals by language for two MID areas, which is necessary to determine the need for oral and written translation services.¹³

¹³ See [FHEO’s webpage on Limited English Proficiency](#) for additional information on these requirements.

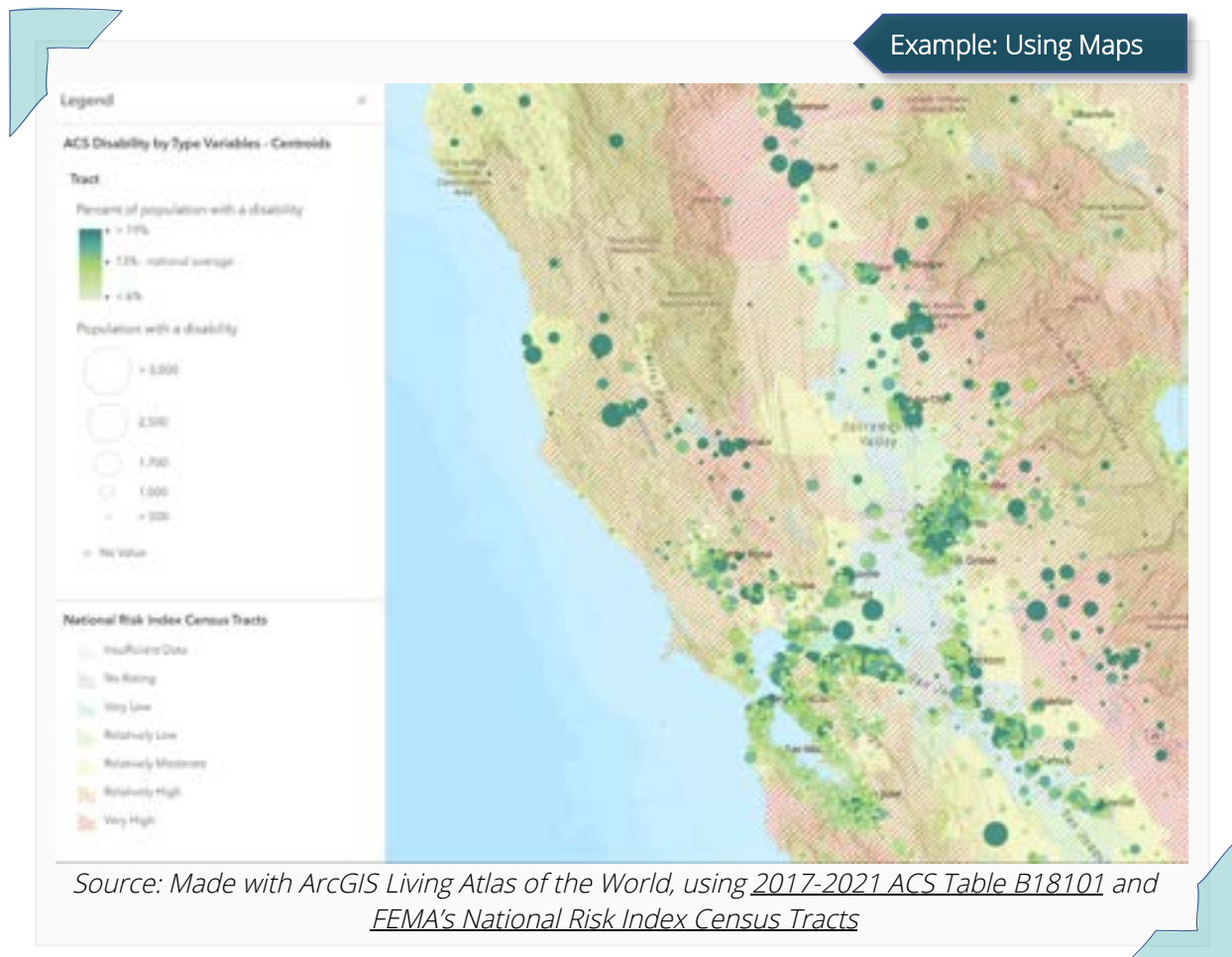
Example: Using Charts



Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table B16001 – “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over”

Maps can effectively display geographic data, particularly showing the intersection between protected class groups and targeted affordable housing/natural hazard response in CDBG-DR-funded activities. By mapping data across a region and within cities, towns, and counties, grantees can see variations in housing and population characteristics that show where the population may have the greatest needs and highest barriers to recovery. In the following example, the National Risk Index data for wildfire risk is overlaid onto census tracts with the highest concentration of the population with disabilities, many of whom live in predominantly rural areas that lack critical infrastructure and resources needed to support them during disasters:

Example: Using Maps



Source: Made with ArcGIS Living Atlas of the World, using 2017-2021 ACS Table B18101 and FEMA's National Risk Index Census Tracts

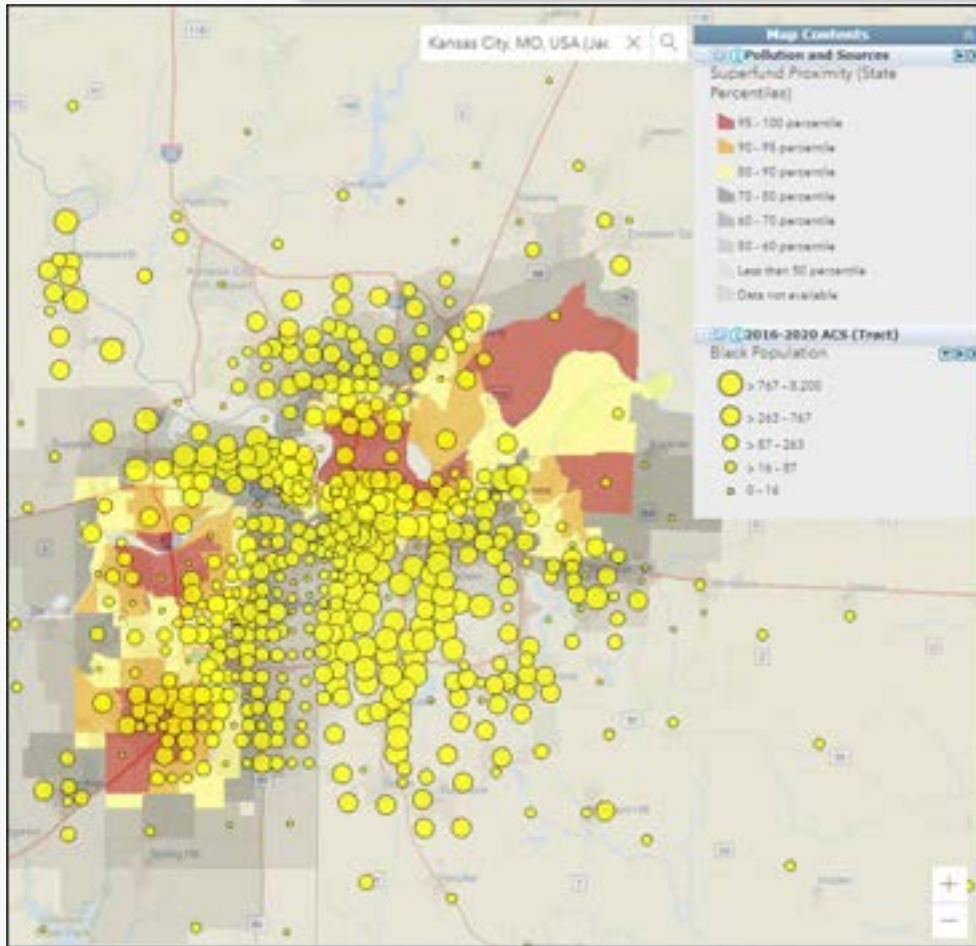
Under the Consolidated Notice, Action Plans must use available data to identify the proximity of natural and man-made environmental hazards (e.g., industrial corridors, sewage treatment facilities, waterways, EPA superfund sites, brownfields, etc.) to affected populations, including members of protected classes, vulnerable populations, and underserved communities in the MID areas. Action Plans must also explore how CDBG-DR activities may reduce environmental risks and increase resilience among these populations to protect against extreme weather events and other natural hazards. To satisfy this requirement, grantees can include maps illustrating known environmental hazards and their proximity to protected classes, vulnerable populations, and underserved communities.

For example, the map below shows the Black population's proximity to Superfund¹⁴ sites: areas declared by the EPA to contain hazardous substances, pollutants, or contaminants that may threaten human health. Discriminatory development policies have concentrated polluting industries near low-income communities of color; Black communities are exposed to 38 percent more air pollution than non-Hispanic Whites and are 75 percent more likely to live

¹⁴ Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. See [42 CFR Part 90](#) and [EPA.gov](#) for additional information.

adjacent to Superfund sites than the average American.¹⁵ Compounding the risk, 60 percent of these sites are in areas prone to wildfires or flooding.¹⁶ Examining how these factors overlap is essential for equitable risk mitigation.

Example: Proximity to Natural and Environmental Hazards



Source: *EJScreen: Environmental Justice Screening and Mapping Tool*

Finally, the grantee will need to disaggregate (i.e., break out) the data by different protected characteristics when such information is available. For example, while housing tenure (whether a renter or owner occupies the housing) might be useful information, breaking down housing tenure by racial group and disability status provides a clearer picture of how a disaster has impacted housing opportunities of protected classes, vulnerable populations, and underserved communities. Relatedly, the fair housing analysis should consider both homeowners and renters. Grantees must identify where there are concentrations of owners and renters, how those patterns have changed over time, and how those concentrations might overlap with

¹⁵ Clark LP, Millet DB, Marshall JD (2014) "National Patterns in Environmental Injustice and Inequality: Outdoor NO₂ Air Pollution in the United States." PLoS ONE 9(4): e94431.

¹⁶ [GAO-20-73](#).

racially segregated or low-income areas. Fair housing concerns related to tenure include whether members of protected classes cannot access homeownership opportunities in certain neighborhoods and whether they are systematically unable to access mortgages.

Social Vulnerability Indices

Many grantees include a Social Vulnerability Index (SoVI) assessment in their Action Plans, such as the [Centers for Disease Control and Prevention \(CDC\) Social Vulnerability Index](#). Such indexes are *composite* measures of social vulnerability, meaning that they compile a variety of variables to compute a single measure of social vulnerability. They can be a helpful tool to highlight communities that may suffer disproportionately in a disaster. However, because they are a composite, and the variables that contribute to formulating the final measure of vulnerability cannot be separated, they are not a helpful tool for identifying the needs and vulnerabilities of specific protected classes. While a SoVI assessment may assist in completing various components of the Action Plan, grantees must perform a distinct analysis identifying where protected classes and vulnerable populations live, how the disaster affected them, and how they will benefit from CDBG-DR funds.

Analysis of Vulnerability

Having collected demographic data for the impacted area, the next step is to consider whether the disaster disproportionately affected members of a protected class or vulnerable groups and their recovery needs.¹⁷ As a best practice, grantees should consider examining a range of physical, social, economic, and environmental vulnerabilities. The questions below about how a disaster may affect specific populations more than others will assist grantees in identifying the recovery needs of protected classes and vulnerable populations.

Physical

- ❖ Does the geographic landscape of the disaster area pose recovery challenges for affected populations? Do affected populations live near natural and environmental hazards? For example, is the area coastal and prone to flooding or within an earthquake zone?¹⁸ How can CDBG-DR funds be used to increase the resiliency of affected populations to the identified hazards?
- ❖ What are the historical factors and policy or planning decisions that resulted in certain groups disproportionately living near natural and environmental hazards?

¹⁷ Consolidated Notice, III.C.1.d. “provide an assessment of whether its planned use of CDBG—DR funds will have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs, particularly in racially and ethnically concentrated areas of poverty, and how it will address the recovery needs of impacted individuals with disabilities. Grantees should also consider the impact of their planned use of CDBG-DR funds on other protected class groups.”

¹⁸ Grantees “must identify the proximity of natural and environmental hazards (e.g., industrial corridors, sewage treatment facilities, waterways, EPA superfund sites, brownfields, etc.) to affected populations in the MID area, including members of protected classes, vulnerable populations, and underserved communities;” and “[must] explore how CDBG—DR activities may mitigate environmental concerns and increase resilience among these populations to protect against the effects of extreme weather events and other natural hazards.”

Social

- ❖ What are the needs of persons who require supportive housing?
- ❖ How will funds address transitional housing and prevent low- to moderate-income (LMI) families from becoming homeless following a disaster?¹⁹
- ❖ How have current land use regulations contributed to segregated living patterns, including by limiting housing affordability?
- ❖ Have the historical practices of discriminatory redlining and racially restrictive covenants continued to influence where people live in the affected area?²⁰
- ❖ Which groups are more likely to rely on public or non-motorized transportation? Can they efficiently access available public transportation? Are there procedures to ensure pedestrian and cyclist safety? How can recovery expand the range of transportation options available to residents?
- ❖ Which groups are more likely to be homeowners in the affected area?

Economic

- ❖ Is there unequal access to investment, such as Small Business Association loans?
- ❖ Is there underutilization of banking institutions among populations?
- ❖ Which protected class groups are more likely to have insurance than others? How can it be disbursed, or what information must be conveyed, to reach these populations during recovery efforts?
- ❖ Who has access to high-quality educational opportunities? Has the disaster worsened inequality in access to educational opportunities?
- ❖ How do the post-disaster infrastructure needs (e.g., retail, health, grocery, etc.) differ among various groups?

Environmental

- ❖ Where are polluting facilities (e.g., industrial corridors, sewage treatment facilities, waterways, EPA Superfund sites, brownfields, etc.) located in relation to protected classes, vulnerable populations, and underserved communities in the MID areas?
- ❖ How have historical practices affected the air, water, or land quality where protected class groups live in the MID areas? How has the disaster impacted environmental quality?
- ❖ Do protected class groups have equal availability of fresh and nutritious food via grocery stores and other markets?

¹⁹ Consolidated Notice, III.C.1.c. “Each Grantee must include a description of how it has analyzed, identified, and will address (with CDBG—DR or other sources) the disaster-related rehabilitation, reconstruction, and new construction needs in the MID-area of the types of housing described below.”

²⁰ Consolidated Notice, III.C.1.d. Grantees are strongly encouraged to explain and provide examples of how their actions can be expected to “overcome prior disinvestment in infrastructure and public services for protected class groups, and areas in which residents belonging to such groups are concentrated, when addressing unmet needs”

Writing the Fair Housing and Civil Rights Assessment

Under the Consolidated Notice, the Action Plan must consider the impact of its CDBG-DR activities on protected classes and other vulnerable groups. Specifically, the notice requires grantees to **provide an assessment** of whether the planned use of CDBG-DR funds will:

- Have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities²¹ in proportion to communities' needs, particularly in racially and ethnically concentrated areas of poverty, and
- Address the recovery needs of impacted individuals with disabilities.

In considering what an “unjustified discriminatory effect on, or failure to benefit, racial and ethnic minorities in proportion to their communities’ needs” might look like, grantees should draw on the community data and vulnerability analysis conducted in the previous section. Consider the pre- and post-disaster conditions affecting the communities identified. Are there institutions and structural issues that restrict access to opportunities for protected groups? How can funding address these issues while funding remaining unmet needs?²² Understanding the answers to these questions can help grantees specifically tailor recovery efforts to the needs of their residents.

Additionally, grantees have an obligation to affirmatively further fair housing by taking meaningful actions that overcome segregation patterns and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. As such, the grantee should consider linking activities proposed in the AP to fair housing goals in an Analysis of Impediments to Fair Housing Choice (AI), Assessment of Fair Housing (AFH), or other fair housing planning documents when appropriate. This requires more than preventing overt discrimination. Grantees should consider the impact of their activities on protected classes and other vulnerable groups, link the efforts they are taking through their CDBG-DR funds to benefit those populations and ensure their planned use of funds will not have unjustified discriminatory effects on, or fail to benefit, these groups in proportion to their needs.

Grantees may choose to include a separate discussion of how the programs and activities are likely to affect protected classes or integrate the analysis throughout the Plan. Grantees are not limited to the structure presented in this document as long as their assessment is complete.

²¹ This document uses the term 'minority' for consistency with the Consolidated Notice.

²² Consolidated Notice, III.C.1.d. “Grantees must also describe how their use of CDBG—DR funds is consistent with their obligation to affirmatively further fair housing. HUD regulations at 24 CFR 5.151 provide that affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

The following example shows how one grantee used the data from the Needs Assessment to inform the Fair Housing Assessment, addressing historical barriers that could have resulted in an unjustified discriminatory effect on communities of color:

Example: Fair Housing Assessment

After performing its Needs Assessment, the State found that communities of color have lower homeownership rates across the income spectrum than whites, primarily due to historical and ongoing discriminatory lending. While the homeownership rate among Whites was 74.32%, it stands at only 37.00% among Black or African Americans, 50.51% among Native Americans, 30.90% among Asian Americans, and 52.15% among Hispanics or Latinos.

Due to these disparities in homeownership, there is a possibility that a State's proposed development of a "Homeowner Assistance Program" could have an unjustified discriminatory effect on or failure to benefit certain racial and ethnic groups (in addition to persons with disabilities) in proportion to their communities' needs. To address this, the State has also developed a "Homeownership Opportunity Program" that includes comparable funding as the Homeowner Assistance Program to help disaster-impacted renters to access affordable homeownership. The program identifies barriers to homeownership that communities of color and persons with disabilities disproportionately experience and seeks to overcome those barriers through more inclusive policies and procedures. Additionally, the program will ensure that criteria for prioritizing equity in distributing CDBG-DR funds are explicit in any implementing manual. The State will develop metrics to assess the distribution of funds, ensuring that the actual administration of these programs is consistent with these requirements and goals.

The Action Plan must also discuss how the administration of its program will address barriers to equitable participation. Grantees must explain how their use of funds will reduce barriers that individuals may face when enrolling in and accessing CDBG-DR assistance.²³ For example, a lack of outreach to a particular community, a lack of information in non-English languages, or documents published in inaccessible formats for individuals with different types of disabilities are barriers that will likely prevent members of those groups from full participation.

In the following example, a grantee identified a historical issue related to homeownership for several protected classes as a barrier and provided strategies to address it:

²³ Consolidated Notice, III.C.1.d.

Example: Barriers to Equity

The mountainous terrain of the impacted area may create environmental barriers and geographic isolation that could make it difficult for persons with disabilities, vulnerable groups, and the general population to access program intake resources in person. The State will address these potential barriers during the intake process and will include remedies to overcome them in program policies and procedures. The programs will use community service centers staffed by case managers as intake sites. Yet there may be applicants whose disabilities, age, or personal circumstances, (e.g., a lack of transportation or vulnerability to COVID) prohibit their entry into a center to complete an application. Therefore, the State will provide remote and off-site intake, such as web and phone-based options.

In some cases, the State may arrange for space at a public library, religious center (church, mosque, temple, etc.), social service agency, or another public venue for applicant intake. A “mobile site” will also be available for harder-to-reach areas with inadequate public space. Home-based intake for home-bound individuals lacking computer or smartphone access will be available. In those cases, if the applicant has limited English or literacy proficiency, the State will provide an interpreter to accompany a non-English-speaking staff member.

In another example, a grantee named a variety of barriers to accessing CDBG-DR assistance for protected groups and devised strategies to connect these populations to recovery resources. The grantee emphasized strategies to address potential obstacles for persons with disabilities or individuals with LEP.

Example: Barriers to Equity

Conditioning assistance on proof of homeownership is likely to pose barriers to recovery participation for African Americans, older persons, persons with disabilities, and lower-income persons, as these groups are more likely than other populations to occupy an heirship property. This means their home has been passed down informally for generations, and they do not have traditional proof of homeownership such as title documentation. Barriers to a clear title for these applicants have been a lack of money to engage an attorney and, in some cases, court costs for clearing a title.

In developing a recovery program designed to support homeownership while overcoming this barrier, the State had developed alternative procedures for protected groups to satisfy the ownership requirement, such as allowing multiple heirs to grant ownership to the applicant, allowing alternative forms of documentation to demonstrate ownership, and enlisting pro bono legal aid when a court proceeding was required to clear title.

Key Takeaways: Impact and Unmet Needs Assessment

Does the Action Plan...

- Include data (number and percentage) for all required groups?
- Provide information for the required subgroups (e.g., LEP groups by language spoken)?
- Describe how CDBG-DR funds are used in a way consistent with the obligation to affirmatively further fair housing?
- Describe how the grantee will ensure its planned use of funds will not have an unjustified discriminatory effect on, or failure to benefit, groups in proportion to their needs?
- Include information about the existing barriers to participation in programs, and if so, how the grantee will address them?



Equity Requirements

Community Engagement

Community engagement is critical to ensuring that recovery efforts are equitable and responsive to the needs of members of vulnerable populations and underserved communities. Grantees must comply with several community engagement requirements in the development of the Action Plan. By facilitating robust and inclusive participation, grantees can clearly understand which impacted areas need the most investment. For additional information on this topic, including best practices and case studies, please see HUD's [Citizen Participation & Equitable Engagement Toolkit](#).

To understand recovery needs, ask for insight from a wide range of affected community members.²⁴ Grantees must afford all members of an affected community the opportunity to provide feedback on the development of an Action Plan. This requirement may be met by contacting trusted community leaders, providing critical materials in an accessible format to individuals with disabilities and individuals with LEP, and holding meetings at various times of the day in a variety of mediums and locations.^{25,26} Grantees should also consider developing and distributing surveys to reach residents who may not participate through other means. After soliciting comments from community members, consider all public comments and submit a summary of comments with the responses.²⁷

²⁴ Consolidated Notice, III.D.1.a. "All Grantees must consult with states, Indian tribes, local governments, Federal partners, nongovernmental organizations, the private sector, and other stakeholders and affected parties in the surrounding geographic area, including organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities..."

²⁵ Consolidated Notice, III.C.1.d. "Grantees must explain how the use of funds will reduce barriers that individuals may face when enrolling in and accessing CDBG—DR assistance, for example, barriers imposed by a lack of outreach to their community or by the lack of information in non-English languages or accessible formats for individuals with different types of disabilities."

²⁶ Consolidated Notice, III.C.1. "The Grantee must describe the steps it will follow to make the action plan, substantial amendments, performance reports, and other relevant program materials available in a form accessible to persons with disabilities and those with limited English proficiency (LEP)."

²⁷ Consolidated Notice, III.A.1.

Grantees are encouraged to consider whether there are potential barriers that may limit vulnerable populations or underserved communities from providing public comment on an Action Plan or substantial amendment. If the grantee identifies barriers that may limit equitable participation, the grantee must take reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with LEP. Grantees should describe the specific outreach strategies used to overcome barriers to participation.²⁸ In the following example, a grantee described their process for community engagement in enacting their programs:

Example: Community Engagement

The State's vulnerable populations and protected classes face barriers to accessing information about programming that must be addressed in outreach and engagement efforts. This includes recognizing a distrust of government officials and government programs that have systematically undermined certain groups' values, including the Black, Indigenous, and other non-White groups. In addition, two particularly important populations to consider include LEP individuals and persons with disabilities. Several storm-affected areas experience linguistic isolation.

Based on outreach to targeted individuals and communities and informed by zip code, the State will launch a print and social media campaign in the HUD and State MID areas to advertise a disaster relief and recovery survey. The survey will include email signup for further conversations on program updates, Action Plan amendments, and other helpful recovery information. The print media campaign will provide public notice and display ads promoting the survey, with advertisements on buses, utility bills, and in newspapers (paid subscription, free, and media targeting non-White racial/ethnic groups). All materials will provide the fair housing logo and information on how to request a reasonable accommodation based on disability or LEP. Media outreach will be targeted to the demographic groups outlined in the Needs Assessment section that were disproportionately impacted by the disaster and least likely to have access to resources for an equitable recovery.

The State will also create a Survey Partner Outreach Toolkit. The toolkit will include various forms of advertising media for partner organizations to easily communicate to the populations they serve. The partner organizations can download the individual resources they want to use, including social media copy and graphics for Facebook and Twitter, the CDBG-DR Factsheet, a descriptive flyer, and an article with interesting graphics for their organization's website or newsletter. The toolkit will be available in multiple languages and meet Section 508 requirements.

²⁸ Consolidated Notice, III.D.1.b.

Effective Communication and Meaningful Access for Persons with LEP and Persons with Disabilities

Limited English Proficiency (LEP)

Persons with LEP must have meaningful access to the planning process and the services provided under the grant. Grantees must also ensure all information about disaster recovery and the Action Plan is accessible to persons with LEP. This may include (but is not limited to) providing oral interpretation at meetings and translating distributed materials and websites, including materials that explain how a person may access language assistance. In sum, the disaster recovery website, along with all vital documents, in-person communication, notices, and any other form of communication used to communicate with the public, must be accessible to LEP populations.²⁹

In the following example, the grantee explicitly describes the language access services they will provide to program participants:

Example: Language Access Procedures

The State will provide oral and written language services. Oral language access services may come in the form of “in-language” communication (i.e., a demonstrably qualified bilingual staff member communicating directly in an LEP person’s primary language) and interpreter services. Written language access services will come from the written translation provided by State translators or a State-approved translation contractor. All outreach materials will be translated into Spanish and shall include a notice in the other nine identified languages stating that language assistance services are available in these languages upon request.

The State will also provide translations of outreach materials in languages other than Spanish when outreach efforts are targeted toward LEP communities and applicants of HUD-funded programs. All correspondence sent to prospective or existing applicants related to HUD-funded programs and services for individuals and businesses shall include a provision indicating that free language interpretation services are available by contacting a toll-free number that serves LEP persons in the appropriate language. In addition to individuals, the state will provide LEP small business owners language interpretation services when specifically requested. The Department’s website will include information about obtaining language access services as an LEP person. Field Offices have posted language access information in conspicuous locations and in multiple languages.

²⁹ Consolidated Notice, III.D.1.d.

Persons with Disabilities

Grantees must also take appropriate steps to ensure [effective communication](#) with **individuals with disabilities**. This means ensuring that all information regarding disaster recovery and the components of the Action Plan are accessible to individuals with disabilities. For example, effective communication is typically provided through auxiliary aids and services, such as interpreters, computer-assisted real-time transcription (CART), captioned videos with audible video descriptions, accessible electronic communications and websites, and documents in alternative formats. As such, the grantee must ensure that documents on its website, including its Action Plan, substantial amendments, vital documents, and performance reports are accessible to individuals with disabilities.

Grantees must also ensure that individuals with disabilities have access to in-person meetings, such as ensuring that individuals with mobility disabilities can fully access any venue used for an in-person meeting. Moreover, any in-person meeting must provide effective communication for attendees with disabilities, including through interpreter services. Grantees should ensure that materials advertising such meetings and engagement opportunities offer a way for the public to request an auxiliary aid, service, or reasonable accommodation.

Example: Accessibility Planning

A State Housing Agency is holding a public hearing on the State's draft CDBG-DR Action Plan. Before the hearing, the Housing Agency ensures that all disaster recovery and mitigation materials, including the draft Action Plan, are available in an accessible format online. The State Agency's website also has a link where individuals with disabilities can request auxiliary aids or services at the hearing, including ASL interpretation or CART services. Following the public hearing, the State Agency ensures that all public notices, including the State's website, the announcement of the public comment period of the Action Plan, and any amendments, Public Hearings, meetings, and any other disaster recovery or mitigation-related communication are accessible to individuals with disabilities. The State Agency also ensures that it advertises that participants may request reasonable accommodations where necessary to receive benefits or services from CDBG-DR-funded programs. Finally, the state agency provides multiple avenues for submitting applications, including online, through paper applications, over the phone, and through an individual with power of attorney to represent a beneficiary.

Other Accessibility Considerations

Program Maximum Assistance

The Action Plan must state that the grantee will make exceptions to maximum award amounts when necessary to comply with federal accessibility standards or to accommodate persons with disabilities. Grantees must also adopt policies and procedures to analyze when such an exception is needed and evaluate the necessary and reasonable amount.³⁰

Example: Maximum Assistance Exceptions

The State may provide exceptions to award maximums on a case-by-case basis. It will include procedures within program guidelines on how the State or its subrecipients will analyze the circumstances under which an exception is needed and the amount of assistance necessary and reasonable. This includes site-specific accessibility needs (e.g., ramps and lifts or roll-in showers), environmental issues, on-site residential infrastructure repairs or replacement (e.g., septic tanks and wells), resilience and mitigation measures, elevation requirements, installation and transportation costs, relocation costs, and requirements of municipal ordinances, as needed.

Elevation and Construction Requirements

If choosing to elevate structures for increased resilience, grantees must describe how they will meet federal accessibility standards, for example, in the design or other arrangements to accommodate persons with a disability under the Fair Housing Act, Section 504, and the ADA.³¹

Example: Elevation Requirements

The State proposes to implement an elevation program using CDBG-DR funds. To ensure that the State complies with applicable accessibility standards in the administration of funds, the State assigns case managers who will assess the specific needs of each eligible elevation program beneficiary and determine if a 504/ADA modification is required.

³⁰ Consolidated Notice, III.C.1.g.

³¹ Consolidated Notice, III.F.6.

Key Takeaways: Equity Requirements

Does the Action Plan...

- Include information about existing barriers to participation in the public comment process, and if so, how the grantee will address them?
- Describe the policies and procedures for oral interpretation and written translation?
- Identify how grantees will provide language assistance and effective outreach to the LEP community?
- Include a summary of oral and written comments received and the grantee's responses?
- Describe how the grantee made reasonable accommodations, auxiliary aids, and services available at public hearings, on its website, and in other materials?
- Describe how CDBG-DR-funded activities will accommodate the functional needs of persons with a disability?
- Describe steps the grantee will follow to make the Action Plan, substantial amendments, performance reports, and other relevant program materials available in a form accessible to persons with disabilities and those with LEP?
- Discuss how public facilities and infrastructure assisted by CDBG-DR will be accessible to persons with a disability?
- Specify that recipients may exceed maximum award or benefit amounts to meet accessibility standards?



Program Design and Implementation

Proposed Use of Funds

Based on the Needs Assessment and community engagement efforts, grantees are strongly encouraged to include examples of how their proposed allocations, selection criteria, and other actions are expected to advance equity for protected classes, vulnerable populations, and other historically underserved communities.^{32,33}

In completing this section, grantees are strongly encouraged to:

- Describe how the funding will address the unmet needs of these populations and include supporting evidence (statistics, maps, tables, graphs, charts, etc.);
- Consider how housing-related expenditures might produce an unjustified discriminatory effect;

³² Consolidated Notice, III.C.2 (state Grantees) and III.C.3 (local government Grantees). The action plan shall describe "How the distribution and selection criteria will address disaster-related unmet needs in a manner that does not have an unjustified discriminatory effect... and ensure the participation of minority residents and those belonging to other protected class groups in the MID areas."

³³ Grantees are "strongly encouraged to include examples of how their proposed allocations, selection criteria, and other actions can be expected to advance equity for protected class groups."

- Support any proposed expenditure of infrastructure and economic revitalization funds with a description of how funds will benefit members of protected classes, including data to support infrastructure programs' expenditures, siting, and locations;
- Consider whether activities are likely to reduce inequities among protected classes in outcomes such as education, healthcare, transportation, retail, food availability, resiliency, employment, household income and wealth, etc.;
- Consider the overall impact of funds on protected class groups, vulnerable populations, and other historically underserved communities;³⁴ and
- Ensure that the budget reflects the prioritization of CDBG-DR spending in MID areas.

If applicable, the Action Plan also needs to describe how the grantee will ensure they have sufficient policies and procedures to promote accessibility and equitable participation in CDBG-DR-funded programs. For example, due to historical and social barriers, low-income residents and communities of color tend to have higher concentrations of renters and lower homeownership rates. Grantees offering buyout programs should be aware of historical differences in homeownership rates by race so that a buyout program does not unintentionally discriminate against a group or reinforce segregation. As a best practice, grantees should provide sufficient support to LMI households to help them relocate to a safer, lower-risk area and can do so by offering optional relocation, rental assistance, or other housing incentives. To address similar concerns in their program design, a grantee provided the following strategies:

Example: Program Considerations

To implement an equitable relocation and buyout program, the State first develops mapping tools that designate areas outside the 100- and 500-year floodplains. Anticipated participants can utilize the mapping tools to ensure that their prospective homes are located outside the floodplains. Communities targeted for buyouts currently found in R/ECAPs will be provided with additional incentives to purchase new, resilient housing in areas of opportunity. The incentive option was designed to fill the gap between the purchase price of the buyout property and the cost for a comparable home replacement in a lower-risk, higher-opportunity housing area. The State will also offer LMI households voluntarily selling property to the buyout program temporary rental and moving assistance to ensure that lower-income families do not find themselves without a place to go after selling their property. Once a replacement property is located, the program will calculate an incentive amount to cover the higher costs of the replacement housing and ensure its affordability. Displaced tenants will also receive relocation benefits through the Uniform Relocation Act (URA) and can stay within the community.

³⁴ Consolidated Notice, III.C.1.d. Fair Housing, civil rights data, and advancing equity.

Subrecipient Monitoring

If a state grantee carries out an activity through subrecipients, it is responsible for providing ongoing oversight and monitoring of subrecipients and subrecipient compliance with all CDBG-DR and civil rights requirements.³⁵ Similarly, local government grantees are responsible for ensuring that CDBG funds, including CDBG-DR funds, are used in accordance with all program requirements, fair housing and civil rights requirements, and for determining the adequacy of performance under subrecipient agreements and for taking appropriate action when performance problems arise.³⁶ Grantees should have clear policies and procedures about how the grantee and its subrecipients will comply with fair housing and civil rights laws and related requirements.

Example: Subrecipient Monitoring

The State will engage Culturally Specific Organizations directly through subrecipient agreements or procured vendors to provide applicants with options for obtaining support from a trusted support network and address potential accessibility challenges for impacted residents who are skeptical or fearful of government programs. The sub-recipient's plan must provide for the area and population-specific outreach through the engagement with: (1) community service organizations that target areas of minority concentrations (primarily African American, Hispanic, and Vietnamese); (2) State- and County-based Fair Housing, aging, and disability service entities; (3) faith-based and veterans groups; and (4) any other advocacy group concerned with the prevention of discrimination based on age, disability, religion, national origin, gender, or sex (including pregnancy, sexual orientation, and gender identity). The sub-recipient's plan must provide application materials (eligibility and paper and/or online), guidebooks, and other program documents in plain language, large print, and translated into Vietnamese or Spanish. The subrecipient must also develop a plan to assist applicants in securing the documents required to verify residency, identity, and income, recognizing that many disaster victims often do not have a driver's license, birth certificate, bank account, annual Social Security or SSI annual income statements, pay stubs, tax returns, utility bills, or property tax receipts. The State will conduct quarterly construction inspections that verify work progression and ensure the work is completed promptly and professionally.

Key Takeaways: Program Design and Implementation

Does the Action Plan...

- Demonstrate how protected classes, vulnerable populations, and other historically underserved communities will benefit from the proposed activities in proportion to their needs?
- Describe how subrecipient activities will be evaluated or monitored to ensure compliance with fair housing and civil rights obligations under the Notice?³⁷

³⁵ Consolidated Notice, III.B.2.c., III.B.2.e., and III.B.2.h.

³⁶ 24 CFR § 570.910

³⁷ Consolidated Notice, III.C.1.d.



After the Action Plan

Completing an approved Action Plan is the first step in the disaster recovery process. Moving beyond the planning stage, grantees and their subrecipients should regularly collect and assess data to ensure compliance with fair housing and civil rights obligations during the implementation of the Action Plan, including by ensuring that protected classes, vulnerable populations, and underserved communities identified in the Action Plan equitably benefit from programs in proportion to their communities' needs. Grantees should continue monitoring and refining programs to ensure equal access to recovery programs for all populations, and if programs are not reaching target recipients, they should implement proactive outreach through a substantial amendment. With climate change increasing the frequency and severity of disasters, Action Plans serve as vital tools to help communities rebuild and recover while expanding opportunities for every resident. As partners in promoting equity, HUD's Office of Fair Housing and Equal Opportunity stands ready to provide further assistance.



Appendix: Potential Data Sources

Topic	Resource Name	Source	Description
Citizen Participation	Citizen Participation & Equitable Engagement Toolkit	HUD	Toolkit with resources to aid CDBG-DR grantees in centering equity in the citizen participation process
Citizen Participation	Title VI/Affirmative Marketing Guidance	HUD	Guidance on how Title VI applies to marketing and application processing
Demographics	ACS Table B02014: American Indian and Alaska Native for Selected Tribal Groupings	Census	American Community Survey data: Indigenous populations and tribal communities
Demographics	ACS Table B09019: Household Type (Including Living Alone) by Relationship	Census	American Community Survey data: data on opposite-sex and same-sex households for spouses and unmarried partners (SOGI)
Demographics	ACS Table B16001: Language Spoken at Home by Ability to Speak English	Census	American Community Survey data: LEP by language spoken (States, Metropolitan Statistical Areas, Metropolitan Divisions, Combined Statistical Areas, and Congressional Districts)
Demographics	ACS Table C16001: Language Spoken at Home for the Population 5 Years and Over	Census	American Community Survey data: LEP by language spoken (Counties and Census tracts)
Demographics	ACS Table DP02: Selected Social Characteristics in the United States	Census	American Community Survey data: Familial status, disability, national origin, LEP, ancestry, veteran status
Demographics	ACS Table DP05, ACS Demographic, and Housing Estimates	Census	American Community Survey data: race, ethnicity, color, sex, age
Demographics	ACS Table S0101: Age and Sex	Census	American Community Survey data: age and sex
Demographics	ACS Table S1101: Households and Families	Census	American Community Survey data: familial status
Demographics	ACS Table S1810: Disability Characteristics	Census	American Community Survey data: disability
Demographics	Affirmatively Furthering Fair Housing Tool (AFFH-T)	HUD	Interactive mapping and reporting tool that allows users to explore and analyze fair housing-related conditions and patterns
Demographics	Baseline Resilience Indicators for Communities (BRIC) Index	USC	Compare places to one another to determine the drivers of resilience for counties and monitor improvements in resilience
Demographics	Community Assessment Reporting Tool (CART)	HUD	Mapping tool that shows HUD investment information at five levels of geography: congressional district, local government, county, Metropolitan Statistical Area (MSA), or state

Topic	Resource Name	Source	Description
Demographics	CPD Maps	HUD	Enables users to map and generate reports with data from a variety of HUD data sources, integrated with demographic and economic indicators
Demographics	DATA SETS HUD USER	HUD	HUD datasets, including the American Housing Survey, median family incomes and income limits, housing discrimination, the HUD-insured multifamily housing stock, and public housing
Demographics	Disaster Impact and Unmet Needs Assessment Kit: Appendix C, Data Sources	HUD	Appendix from HUD's Disaster Impact and Unmet Needs Assessment Kit; list of commonly available data from federal, state, and local resources across housing, infrastructure, and the economy
Demographics	Household Pulse Survey	Census	Quarterly survey, contains sexual orientation and gender identity (SOGI) data
Demographics	Housing Needs Assessment	LHS	Customizable report presenting data, maps, and visualizations describing local demographics and measures of housing affordability, housing stock characteristics, and variations in key housing indicators by race, ethnicity, age, and income
Demographics	HUD's Geospatial Data Storefront	HUD	Ca of HUD's geospatial datasets, web-based mapping tools, and application programming interfaces
Demographics	Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	Census	Data and mapping tool that identifies racially or ethnically concentrated areas of poverty (R/ECAPs)
Demographics	RAD Minority Concentration Analysis Tool	HUD	Generally used for public housing in the RAD program; can be used to quickly assess if a geography is in an area of minority concentration and access data on indicators of revitalization
Demographics	Religious Landscape Study	Pew	2014 survey of religious groups in the U.S. by tradition and denomination
Demographics	The American Values Atlas	PRRI	Mapping tool providing demographic, religion, SOGI, and cultural data gathered through an annual survey
Demographics	Williams Institute	UCLA	Map and data tool combining Gallup data with the ACS to show data interactives provide information on SOGI in the US
Disaster/ Climate	Are Affordable Housing Properties Exposed to Environmental and Climate Hazards?	NOAA	Map-based tool showing environmental and climate hazards with HUD-assisted or Low-Income Housing Tax Credit (LIHTC) housing
Disaster/ Climate	CDBG-DR Buyouts HUD Open Data	HUD	Data and mapping tool demonstrating the location of CDBG-DR-funded buyout activities

Topic	Resource Name	Source	Description
Disaster/ Climate	Climate Mapping for Resilience and Adaptation	CMRA	Real-time statistics and maps documenting where people, property, and infrastructure may be exposed to hazards
Disaster/ Climate	County Disability Natural Disasters Map	Mathematica	Maps highlighting county-level variation in disability prevalence and the risk of natural disasters
Disaster/ Climate	EnviroMapper for Envirofacts	EPA	Provides access to several EPA databases and generates maps of environmental information
Disaster/ Climate	Extreme Heat Vulnerability Mapping Tool (HEAT.gov)	EPA	Overlays NOAA projected heat events and CDC's Social Vulnerability Index (SVI) to determine the social vulnerability of every county
Disaster/ Climate	FEMA Resources for Climate Resilience	FEMA	Description of available FEMA resources for climate change
Disaster/ Climate	OpenFEMA Data Sets	FEMA	FEMA data, including Individual Assistance, Public Assistance, and Hazard Mitigation programs
Disaster/ Climate	Resilience Analysis and Planning Tool (RAPT)	FEMA	Mapping tool with many data layers and analysis tools to inform decisions for outreach, planning, mitigation, and recovery
Disaster/ Climate	Storm Events Database Explorer	NOAA	Data on the occurrence of storms and other significant weather phenomena since 1950
Disaster/ Climate	U.S. Climate Resilience Toolkit	CMRA	Tools, information, and subject matter expertise to build climate resilience
Equity	18f Content Guide: Inclusive Language	GSA	Provides principles, resources, and specific suggestions for writing and talking about diverse groups of people
Equity	Access Board Guidance Documents	USAB	List of Access Board current guidance documents (including animations and videos) related to the Americans with Disabilities Act of 1990 and Architectural Barriers Act of 1968
Equity	CDC/ATSDR Social Vulnerability Index (SVI)	HHS	Tool using Census data to determine the social vulnerability of census tracts
Equity	Climate & Economic Justice Screening Tool	EPA	Interactive map showing indicators of burdens in eight categories: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development
Equity	CONVERGE Training Modules	NSF	Free trainings with objectives, lesson plans, written content, and disaster-focused case study vignettes from the U.S. and across the globe

Topic	Resource Name	Source	Description
Equity	EJSCREEN: Environmental Justice Screening and Mapping Tool	EPA	Environmental justice mapping and screening tool that combines environmental and demographic indicators in maps and reports
Equity	Environmental Justice Index (EJI)	EPA	National, place-based tool designed to measure the cumulative impacts of environmental injustice on health for every census tract
Equity	ICT Accessibility 508 Standards and 255 Guidelines	USAB	Standards addressing access to information and communication technology (ICT) under Section 508 of the Rehabilitation Act and Section 255 of the Communications Act
Equity	Leading Practices to Advance Equity	HHS	Tools that health and human services programs can use to consider equity throughout their programming
Equity	Low-Income Housing Tax Credit Database	HUD	Provides information about rental housing supported by the LIHTC program
Equity	Natural Hazards National Risk Index	FEMA	Dataset and mapping tool using natural hazard and community risk factors for each US county and Census tract
Equity	Natural Hazards Center	NSF	Information clearinghouse for the societal dimensions of hazards and disasters
Equity	NEPAssist	EPA	Mapping tool that shows environmental considerations in relation to demographics and Justice40 indicators
Equity	Social Vulnerability Index (SoVI) 2010–2014	USC	Measures the social vulnerability of all US counties to environmental hazards
Equity	Using Data to Assess Fair Housing and Improve Access to Opportunity	Urban	Guide containing details on data sources related to demographics and segregation, housing, land use, disability, education, employment, environment, health, and public safety
Fair Housing	Accessibility FIRST	HUD	Offers guidance and technical support about the Fair Housing Act design and construction requirements through instruction programs, online resources, and a toll-free information line
Fair Housing	Basically CDBG: Fair Housing Chapter	HUD	Summarizes the key regulations and requirements of fair housing, accessibility, and equal employment/contracting laws applicable to CDBG
Fair Housing	Best Practices in Fair Housing Planning: Dissimilarity Index	HUD	Tool to measure the level of segregation between two groups in a community
Fair Housing	Fair Housing Assistance Programs (FHAPs)	HUD	State and local governments that receive HUD funding to administer fair housing laws, including those enacted in their localities

Topic	Resource Name	Source	Description
Fair Housing	Fair Housing Guidance	HUD	FHEO guidance documents, fact sheets, policies, and procedures
Fair Housing	Fair Housing Initiative Programs (FHIPs)	HUD	Fair housing organizations and other non-profits that receive HUD funding to promote fair housing laws and equal opportunity
Fair Housing	How to Find and Use Local Data in Fair Housing Planning	HUD	Training video on how to find and use local data for fair housing planning
Fair Housing	Lessons from the Ground: Best Practices in Fair Housing Planning	HUD	Toolkit offering general fair housing guidance to help HUD program participants complete meaningful fair housing plans
Fair Housing	LGBTQIA+ Fair Housing Toolkit	HUD	Comprehensive training regarding rights, best practices, and policies concerning LGBTQIA+ individuals (SOGI)
Fair Housing	National Fair Housing Training Academy	HUD	Collection of fair housing resources organized by topic