



November 2021

DISASTER RECOVERY

Better Data Are Needed to Ensure HUD Block Grant Funds Reach Vulnerable Populations

Accessible Version



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Why GAO Did This Study

Large-scale disasters, such as the 2017 hurricanes, have resulted in catastrophic damage and particularly have challenged vulnerable populations. Since 1993, Congress has provided over \$90 billion in supplemental appropriations through HUD's CDBG-DR funds to help affected areas recover.

GAO was asked to evaluate the delivery of CDBG-DR assistance to vulnerable populations. This report examines (1) HUD's approach to assisting vulnerable populations, (2) grantees' actions to assist vulnerable populations, and (3) challenges grantees and vulnerable populations face in implementing and using CDBG-DR.

GAO reviewed documentation from HUD and a nongeneralizable sample of six grantees (the four largest 2017 CDBG-DR grantees—Florida, Puerto Rico, Texas, and the U.S. Virgin Islands—and Louisiana and New Jersey, which are further along in implementation). GAO also interviewed HUD officials, grantees, and organizations representing vulnerable populations.

What GAO Recommends

GAO recommends that HUD collect, analyze, and publish demographic data from CDBG-DR grantees on vulnerable populations who apply for and receive assistance. HUD did not agree or disagree with the recommendation but identified potential ways to collect data to assess how vulnerable populations are being served and the associated challenges. GAO continues to believe the recommendation would assist in assessing outcomes.

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Better Data Are Needed to Ensure HUD Block Grant Funds Reach Vulnerable Populations

What GAO Found

Recent *Federal Register* notices for the Department of Housing and Urban Development's (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) funds direct grantees to demonstrate how their programs will promote housing for vulnerable populations. Grantees generally have been required to spend 70 percent of their funds on low- and moderate-income people. Draft action plans that grantees submit to HUD are to describe how grant funds will be used and the populations to be served, including vulnerable populations such as racial minorities, the elderly, or persons with disabilities. HUD provides tools, such as strategies for reaching people with limited English proficiency, to help grantees serve these populations. When reviewing grantees' draft plans, HUD officials told GAO they typically require revisions to clarify the populations defined as vulnerable, how funds will be used to help them, and how grantees will reach out to traditionally underserved populations. HUD officials also noted that vulnerable populations can be difficult to define because they vary locally and regionally based on factors such as geography, housing stock, and policy, but described steps they plan to take to develop and include a definition in upcoming *Federal Register* notices.

CDBG-DR grantees told GAO they assist low- and moderate-income people who are members of vulnerable populations; however, HUD does not collect and analyze key demographic data needed to fully assess the extent. HUD requires grantees to report selected data (race and ethnicity and the gender of single-headed households) for those served by activities that directly benefit households or individuals (such as housing). However, HUD only requires grantees to report these data on individuals actually served, not on all those who apply. The six grantees GAO reviewed gather additional demographic information on both applicants and those served, including age, disability status, and primary language. A 2021 Executive Order cited the need for better data collection and transparency on assistance to vulnerable populations, noting that a lack of data impedes efforts to measure and advance equity. By collecting, analyzing, and publicly reporting these additional demographic data, HUD and grantees could better assess whether they are effectively reaching the populations CDBG-DR activities are intended to serve.

According to grantees and organizations GAO interviewed, and studies GAO reviewed, vulnerable populations may experience several challenges accessing CDBG-DR assistance. These include language barriers, such as the need for translation services for those with limited English proficiency; limited access to transportation, especially for individuals without physical access to assistance intake centers or with mobility impairments; and program requirements, such as those that involve extensive documentation. Some grantees have addressed these challenges by acquiring translation services and developing outreach plans to reach vulnerable populations.

Contents

GAO Highlights	ii
Why GAO Did This Study	ii
What GAO Recommends	ii
What GAO Found	ii
Letter	1
Background	4
CDBG-DR Is Intended to Assist Low- and Moderate-Income Persons and Increasingly Has Focused on Serving Vulnerable Populations	8
Grantees We Reviewed Assist Vulnerable Populations but Report Limited Demographic Data to HUD	14
Grantees and Vulnerable Populations Can Face a Variety of Challenges	22
Conclusions	30
Recommendation for Executive Action	31
Agency Comments	31
Appendix I: Objectives, Scope, and Methodology	34
Appendix II: Demographic and Housing Characteristics of Selected Grantees	38
Appendix III: Comments from the Department of Housing and Urban Development	56
Text of Appendix III: Comments from the Department of Housing and Urban Development	62
Appendix IV: GAO Contact and Staff Acknowledgments	69
Tables	
Table 1: Planned Activities Using CDBG-DR Funds That Assist Low- and Moderate-Income Persons with Other Vulnerabilities	16
Table 2: Examples of Publicly Available CDBG-DR Data for Louisiana and Texas	19
Table 3: Characteristics of People, Households, Families, and Housing Units in Florida (2012–2016), by Area Affected by Hurricane Irma	39

Table 4: Characteristics of People, Households, Families, and Housing Units in Louisiana (2010–2014), by Area Affected by the 2016 Floods	42
Table 5: Characteristics of People, Households, Families, and Housing Units in New Jersey (2009–2011 and 2007–2011), by Area Affected by Hurricane Sandy	45
Table 6: Characteristics of People, Households, Families, and Housing Units in Puerto Rico (2012–2016), by Area Affected by Hurricanes Irma and Maria	48
Table 7: Characteristics of People, Households, Families, and Housing Units in Texas (2012–2016), by Area Affected by Hurricane Harvey	51
Table 8: Characteristics of People, Households, Families, and Housing Units in the U.S. Virgin Islands (2010), by Area Affected by Hurricanes Irma and Maria	54

Abbreviations

ACS	American Community Survey
CDBG-DR	Community Development Block Grant Disaster Recovery
CDBG-MIT	Community Development Block Grant Mitigation
COVID-19	Coronavirus Disease 2019
DRGR	Disaster Recovery Grant Reporting
FEMA	Federal Emergency Management Agency
FHEO	Office of Fair Housing and Equal Opportunity
HUD	Department of Housing and Urban Development
OMB	Office of Management and Budget

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November 10, 2021

The Honorable Maxine Waters
Chairwoman
Committee on Financial Services
House of Representatives

The Honorable Al Green
Chairman
Subcommittee on Oversight and Investigations
Committee on Financial Services
House of Representatives

Large-scale disasters—such as Hurricanes Harvey, Irma, and Maria in 2017 and Hurricane Sandy in 2012—have caused catastrophic damage to homes, businesses, and communities.¹ Since 1993, Congress has provided over \$90 billion in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to help affected areas recover. Communities may use their CDBG-DR grants to address unmet recovery needs—losses not met with insurance or other forms of federal assistance. The Department of Housing and Urban Development (HUD) administers CDBG-DR.

Vulnerable populations can face particular challenges in recovering from a disaster. HUD regulations and guidance for CDBG-DR generally do not define vulnerable populations, and definitions may vary.² For the purposes of this report, we focus on low- and moderate-income persons (statutorily defined for the CDBG-DR program) and other potentially

¹For purposes of this report, we refer to Hurricanes Harvey, Irma, and Maria as the 2017 hurricanes.

²Although there can be some overlap, vulnerable populations can be distinguished from protected classes, which are specifically defined in statute and afforded protections against discrimination. The Fair Housing Act's protected classes are race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, and disability. HUD's *Federal Register* notices for CDBG-DR include prohibitions against discrimination.

vulnerable populations such as, but not limited to, the elderly, people with disabilities, racial minorities, and LGBTQ individuals.³

You asked us to evaluate the delivery of CDBG-DR assistance to vulnerable populations. Specifically, this report examines (1) HUD's approach to assisting vulnerable populations, (2) grantees' actions to assist vulnerable populations, and (3) challenges grantees and vulnerable populations face in implementing and using CDBG-DR.

To identify HUD's approach to assisting vulnerable populations, we reviewed relevant laws and HUD regulations, policies, and procedures that govern CDBG-DR grants.

To determine the actions grantees have taken to assist vulnerable populations, we reviewed the action plans of a sample of six grantees for information on activities that assist vulnerable populations. We selected four of these grantees because they were the largest 2017 CDBG-DR grantees (Florida, Puerto Rico, Texas, and the U.S. Virgin Islands) and two because they were further along in implementation of their grant programs (Louisiana and New Jersey). Their views are not generalizable to other grantees but offer important perspectives.

We also reviewed reports in the Disaster Recovery Grant Reporting (DRGR) system (HUD's database for accessing grant funds and reporting performance) to determine the extent to which demographics such as race and ethnicity are reported. We also reviewed demographic information our sample of six grantees collect on CDBG-DR program applicants. We compared the data that HUD collects against leading practices on successful data-driven performance reviews and federal internal control standards for information and communication.⁴

³Low- and moderate-income persons are those with up to 80 percent of the area median income. 42 U.S.C. § 5302(a)(20)(A). We recognize that people may identify with more than one of these populations. Other terms also are used to describe LGBTQ and related identities, including "LGBTQIA," which stands for lesbian, gay, bisexual, transgender, queer, intersex, and asexual. However, for purposes of this report, we use the umbrella term "LGBTQ" as that is how HUD commonly refers to these populations.

⁴GAO, *Managing for Results: Data-Driven Performance Reviews Show Promise But Agencies Should Explore How to Involve Other Relevant Agencies*, [GAO-13-228](#) (Washington, D.C.: Feb. 27, 2013); and *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

To describe the challenges grantees and vulnerable populations face, we reviewed reports and studies on disaster recovery and vulnerable populations published by selected organizations representing vulnerable populations.

To address all of our objectives, we interviewed officials at HUD and our sample of six grantees.⁵ We also interviewed representatives at nine organizations that represent vulnerable populations—four national organizations (National Center for Disaster Preparedness, National Low Income Housing Coalition, Enterprise Community Partners, and SBP—previously called St. Bernard Project) and five organizations in areas served by grantees we interviewed (Ayuda Legal, Florida Housing Coalition, Louisiana Fair Housing Action Center, New Jersey Fair Share Housing Center, and Texas Appleseed). Appendix I describes our objectives, scope, and methodology in greater detail. Appendix II presents demographic data from the U.S. Census Bureau on the disaster areas in our scope.⁶

We conducted this performance audit from July 2020 to November 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁵We also interviewed officials from Harris County, Texas, which received an allocation from the state to directly administer its own CDBG-DR activities.

⁶We assessed the reliability of the Census data we used by reviewing relevant documentation and electronically testing the data. We determined the data were sufficiently reliable for describing the characteristics of vulnerable populations in selected areas.

Background

CDBG-DR funds are among numerous disaster recovery efforts that begin after a President declares a federal disaster.⁷ Administered by the Office of Community Planning and Development within HUD, CDBG-DR funds provide significant, flexible federal recovery funding for states and localities affected by disasters and generally support long-term recovery. CDBG-DR funds may be used for unmet needs related to housing, economic revitalization, and infrastructure. HUD may direct grantees to primarily consider and address unmet housing recovery needs, as the agency did for the 2017 grantees.

History of CDBG-DR

The purpose of the traditional CDBG program is to develop viable urban communities by providing decent housing and a suitable living environment and by expanding economic opportunities, principally for low- and moderate-income persons. Because it provides a mechanism to provide federal funds to states and localities, the program is widely viewed as a flexible solution to disburse federal funds to address unmet needs in emergency situations.

When disasters occur, Congress often has appropriated additional CDBG funding (CDBG-DR) through supplemental appropriations, giving HUD the authority to waive or modify many of the statutory and regulatory provisions governing the CDBG program and providing states with greater flexibility and discretion to address recovery needs.⁸ Once Congress has appropriated CDBG-DR funds, HUD publishes notices in the *Federal Register* to allocate the funding appropriated to affected

⁷Federal agencies can respond to a disaster when effective response and recovery are beyond the capabilities of the affected state and local governments. In such cases, the Robert T. Stafford Disaster Relief and Emergency Assistance Act permits the President to declare a major disaster in response to a request by the governor of a state or territory or by the chief executive of a tribal government. Such a declaration is the mechanism by which the federal government becomes involved in funding and coordinating response and recovery activities.

⁸HUD may not waive requirements related to fair housing, nondiscrimination, labor standards, and the environment.

communities based on unmet need, and to outline the grant process and requirements for the grantees' use of the funds.

In response to the 2017 hurricanes, HUD awarded approximately \$19.9 billion in funds to Puerto Rico, \$9.8 billion to Texas, \$1.9 billion to the U.S. Virgin Islands, and \$1.3 billion to Florida.⁹ It awarded \$1.7 billion to Louisiana in response to the 2016 floods and \$4.2 billion to New Jersey after Hurricane Sandy.

Grantee Requirements and Vulnerable Populations

Examples of grantee requirements in *Federal Register* notices include the following:

- Seventy percent of CDBG-DR funds must benefit low- and moderate-income persons.
- Grantees must submit action plans to HUD for disaster recovery, including an assessment of unmet needs and a description of activities intended to meet those needs.¹⁰
- Grantees may use CDBG-DR funds only for activities in a HUD-approved action plan, which include activities such as relocation payments to displaced residents, acquisition of damaged properties, and rehabilitation of damaged homes.¹¹

Unmet needs assessments help grantees identify needs specific to vulnerable populations. There are a number of tools grantees may use to determine populations' vulnerabilities. One example is census data, which, according to HUD officials, can form a baseline for identifying the size and concentration of vulnerable populations. They noted that

⁹These figures include CDBG funding for unmet needs (CDBG-DR) and funding for mitigation (CDBG-MIT). CDBG-MIT funding supports disaster recovery through activities to mitigate risks and lessen the effect of future disasters.

¹⁰Among other things, each grantee must include a description of how it will identify and address the rehabilitation, reconstruction, replacement, and new construction of housing and shelters in the areas affected by the disaster. This includes any rental housing that is affordable to low- or moderate-income households, public housing, emergency shelters and housing for homeless people, private market units receiving project-based assistance or with tenants that participate in the Housing Choice Voucher Program, and any other housing that is assisted under a HUD program.

¹¹For more information on the steps taken before entering into a grant agreement, see GAO, *Disaster Recovery: Better Monitoring of Block Grant Funds Is Needed*, [GAO-19-232](#) (Washington, D.C.: Mar. 25, 2019).

collection, organization, and analysis of these data can be tailored to reflect the grantees' individual definitions of vulnerable populations. For census data on the demographic and housing characteristics of selected grantees, see appendix II.

In addition, the Federal Emergency Management Agency (FEMA), which plays a lead role in federal disaster response, created a National Risk Index. This online tool helps illustrate the communities most at risk of natural hazards. When determining risk, the tool considers social vulnerability—a risk component that measures the susceptibility of social groups to the adverse effects of natural hazards. In addition, the University of South Carolina Hazards and Vulnerability Research Institute's Social Vulnerability Index examines the differences in vulnerability among counties and considers socioeconomic variables that contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards.¹²

Research studies and our prior work have demonstrated the intersection between low- and moderate-income populations and other vulnerable populations. For example, a September 2020 Census report found that despite declines in poverty rates in 2019, Black and Hispanic Americans continue to be over-represented in the population in poverty relative to their representation in the overall population.¹³ The share of Black Americans in poverty was 1.8 times greater than their share among the general population and the share of Hispanic Americans in poverty was 1.5 times greater. These poverty rates were especially pronounced among children and people ages 65 and older. Similarly, in a February 2018 report, we found that Census information showed higher

¹²According to HUD officials, one limitation of the Social Vulnerability Index is that it aggregates legally protected characteristics with other forms of vulnerability. Thus, areas with protected populations may be afforded the same priority as areas with vulnerable groups that are not protected under fair housing and civil rights laws.

¹³Census Bureau, *Inequalities Persist Despite Decline in Poverty For All Major Race and Hispanic Origin Groups* (Washington, D.C.: Sept. 14, 2020).

percentages of minorities that were also low-income in certain geographic areas.¹⁴

Prior Work on CDBG-DR

We conducted reviews recently on the administration of CDBG-DR and made a number of recommendations for improvement. In our March 2019 report, we found that improvements were needed in the monitoring of CDBG-DR funds.¹⁵ We made five recommendations to HUD intended to help it improve CDBG-DR program management by better assessing grantees' processes and capacity, implementing a comprehensive monitoring plan, and developing a workforce plan. HUD implemented four recommendations and has not yet fully implemented the remaining one to provide its staff with additional guidance on reviewing grantees' capacity and unmet needs assessments.¹⁶ In addition, in May 2021, we found that CDBG-DR was vulnerable to numerous fraud risks.¹⁷ Our recommendations included that HUD comprehensively assess these fraud risks (and identify inherent fraud risks affecting CDBG-DR) and examine the suitability of existing fraud controls.¹⁸

¹⁴GAO, *Community Reinvestment Act: Options for Treasury to Consider to Encourage Services and Small-Dollar Loans When Reviewing Framework*, [GAO-18-244](#) (Washington, D.C.: Feb. 14, 2018). In addition, we plan to issue a report in late fall 2021 addressing the extent to which the six largest federal recovery programs (including CDBG-DR) have taken action to identify and address potential barriers to accessing the programs and disparate outcomes among individuals and communities who have experienced a disaster.

¹⁵[GAO-19-232](#).

¹⁶HUD partially agreed with this recommendation and, in February 2021, provided us with a draft of such guidance, which largely refers HUD staff to the associated *Federal Register* notice but generally does not describe how HUD reviewers should evaluate the adequacy of capacity and unmet needs assessments. We continue to monitor steps taken to address this recommendation.

¹⁷GAO, *Disaster Recovery: HUD Should Take Additional Action to Assess Community Development Block Grant Fraud Risks*, [GAO-21-177](#) (Washington, D.C.: May 5, 2021).

¹⁸HUD neither agreed nor disagreed with this recommendation and has not yet implemented it. HUD stated it took initial steps to create a template for fraud risk assessment in 2019, but this effort has been delayed because of the Coronavirus Disease 2019 (COVID-19) pandemic and contracting issues. We continue to monitor steps taken to address this recommendation.

CDBG-DR Is Intended to Assist Low- and Moderate-Income Persons and Increasingly Has Focused on Serving Vulnerable Populations

HUD requires CDBG-DR grantees to assist vulnerable populations by providing the majority of funds to low- and moderate-income persons and serving those with unmet needs. Recent *Federal Register* notices for CDBG-DR funds direct grantees to demonstrate how their programs will promote housing for vulnerable populations.¹⁹

HUD Requires CDBG-DR Grantees to Primarily Assist Low- and Moderate-Income Persons and Serve Others with Unmet Needs

CDBG-DR funds are to be used to assist low- and moderate-income persons and those with unmet needs.

Low- and Moderate-Income Requirement

CDBG-DR *Federal Register* notices state the primary objective of the Housing and Community Development Act of 1974, the authority for CDBG, is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for low- and moderate-income persons.²⁰ Accordingly, in both the February 2018 *Federal Register* notice for the 2017 grantees and the November 2016 *Federal Register* notice for Louisiana, HUD required grantees to spend at least 70 percent of their aggregate CDBG-DR funds to support activities benefitting low- and

¹⁹For this report, we focused on the initial *Federal Register* notices that govern the CDBG-DR funding allocated to the six grantees in our sample. These notices are 78 Fed. Reg. 14329 (Mar. 5, 2013), which allocated funding to New Jersey after Hurricane Sandy; 81 Fed. Reg. 83254 (Nov. 21, 2016), which allocated funding to Louisiana after the 2016 floods; and 83 Fed. Reg. 5844 (Feb. 9, 2018), which allocated funding to Florida, Puerto Rico, Texas, and the U.S. Virgin Islands after the 2017 hurricanes.

²⁰42 U.S.C. § 5301(c). Under the traditional CDBG program, grantees must use at least 70 percent of their funds for activities that principally benefit low- and moderate-income persons over a period of 1, 2, or 3 years, as specified by the grantee. 42 U.S.C. § 5304(b)(3).

moderate-income persons. The 70 percent requirement remains in effect unless HUD waives it.²¹

In the March 2013 *Federal Register* notice for Hurricane Sandy grantees and consistent with practices in earlier notices, HUD waived the requirement for grantees to spend 70 percent of funds on low- and moderate-income populations, decreasing the amount to 50 percent.²² HUD noted the 70 percent target could be difficult and perhaps even impossible to reach for many grantees affected by Hurricane Sandy and might prevent grantees from assisting damaged areas of need. The 2013 notice emphasized that the disaster affected entire communities, regardless of income.

Although grantees did not express major concerns with meeting the low- and moderate-income requirement, there could be location-specific issues. For example, in response to the 2017 hurricanes, grantee officials in Puerto Rico explained that because the island is almost completely a low- and moderate-income designated area, there are challenges to equitably serving the entire population.

Also, citing recovery after Hurricane Sandy, HUD officials and a research study noted that some disaster-affected areas may not have a large low- and moderate-income population.²³ The study noted that although grantees can design direct benefit recovery programs (those that benefit particular households or persons such as relocation payments or homeownership assistance) to specifically target low- and moderate-income persons, activities using the area benefit (such as infrastructure)

²¹A CDBG-DR grantee may request that HUD waive the 70 percent requirement, but it must submit a justification that (1) identifies the planned activities that meet the needs of its low- and moderate-income population; (2) describes the proposed activities that will be affected by the alternative requirement, including their proposed locations and roles in the grantee's long-term disaster recovery plan; (3) describes how the activities identified prevent the grantee from meeting the 70 percent requirement; and (4) demonstrates that low- and moderate-income persons' disaster-related needs have been met sufficiently and that the needs of non-low and moderate-income persons or areas are disproportionately greater, and that the jurisdiction lacks other resources to serve them.

²²In consecutive notices for disasters that occurred from 2001 through 2016, HUD waived the requirement that 70 percent of CDBG funds received by the state over a 1- to 3-year period be for activities that benefit low- and moderate-income persons.

²³Simon McDonnell, et al., "Potential Challenges to Targeting Low and Moderate Income Communities in a Time of Urgent Need: The Case of CDBG-DR in New York State after Superstorm Sandy," *Housing Policy Debate*, vol. 28, no. 3 (2018).

are more constrained by the underlying demographics of the affected areas.²⁴ Some affected areas may have large low- and moderate-income populations and some may not.

Unmet Needs Requirement

Federal Register notices also require grantees to conduct an unmet needs assessment, which can help them identify any needs specific to vulnerable populations. Grantees develop needs assessments to understand the type and location of community needs, and to target limited resources to those areas with the greatest need. These assessments include profiles of the most impacted and distressed areas, including socioeconomic and demographic data (such as race, age, income, education, and disability status) from Census and social vulnerability indexes.²⁵ Grantees use this information to design programs that respond to identified long-term recovery needs. One grantee told us using a social vulnerability index helped it assist the disaster area's most vulnerable populations, and another grantee used the index to allocate funding among the different disaster regions.

HUD's Notices Increasingly Have Focused on Serving Vulnerable Populations

HUD's *Federal Register* notices on CDBG-DR—which require grantees to submit action plans describing how they plan to use grant funds and the populations to be served—increasingly have directed grantees to focus on serving vulnerable populations. In its more recent CDBG-DR notices—for the 2016 Louisiana floods and the 2017 disasters—HUD maintained the requirement to spend 70 percent of funds on low- and moderate-income persons. HUD also directed grantees to demonstrate how their programs would promote housing for vulnerable populations, although

²⁴Area benefit activities are generally those that provide benefit to all persons in a geographically defined area. Grantees must define the geographic area that will benefit by using census data or by using survey data to determine characteristics of the service area in accordance with CDBG guidelines.

²⁵Pursuant to appropriations acts, HUD is not obligated to allocate funds for all major disasters declared in a given year. Instead, HUD is directed to use the funds in the “most impacted and distressed areas.” HUD implements this directive by allocating funding to areas where (1) FEMA determined the damage was sufficient to declare the disaster as eligible to receive Individual and Households Program funding and (2) concentrated damage exists in counties and ZIP codes with serious unmet housing needs.

vulnerable populations are not specifically defined. For example, HUD required that grantees describe their plans to address transitional housing, supportive housing, homelessness, and those at risk of homelessness.²⁶ In contrast, the 2013 Sandy notice did not specifically mention vulnerable populations. Instead, it required grantees to describe how they would encourage the provision of disaster-resistant housing for all income groups.

Recent *Federal Register* notices on funds for mitigation and enhanced and improved electrical power systems also have cited vulnerable populations. The 2019 *Federal Register* notice for Community Development Block Grant Mitigation (CDBG-MIT) funds, which support activities to mitigate risks of future disasters, states that CDBG-DR and CDBG-MIT grants have a statutory focus on vulnerable lower-income people and communities. The notice requires grantees that implement housing programs to support vulnerable populations. It does not define vulnerable populations, but it describes housing that typically supports them—public housing developments, transitional housing, permanent supportive housing, and permanent housing serving individuals and families who are homeless or at risk of homelessness. According to HUD, the agency has not typically defined vulnerable populations because of the wide range of populations that may be affected by disasters, noting that they may vary locally and regionally based on factors such as geography, housing stock, and policy.

In addition, the June 2021 *Federal Register* notice allocating funds for the electric power systems in Puerto Rico and the U.S. Virgin Islands requires grantees to describe how the funds will be used to address the needs of vulnerable populations.²⁷ It states that HUD generally defines vulnerable populations as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources.

²⁶The *Federal Register* notices state that grantees' programs must address (1) transitional housing, permanent supportive housing, and permanent housing needs of individuals and families (including subpopulations) that are homeless and at risk of homelessness; (2) the prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; and (3) the special needs of persons who are not homeless but require supportive housing (such as the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents).

²⁷86 Fed. Reg. 32681 (June 22, 2021).

The *Federal Register* notices also reference fair housing and civil rights laws that prohibit discrimination against protected classes, which include some vulnerable populations.²⁸ According to HUD officials, vulnerable populations may include protected classes under the Fair Housing Act and other groups such as low- and moderate-income persons, persons experiencing homelessness, and the elderly. Grantees are required to assess how planning decisions might affect members of protected classes, racially and ethnically concentrated areas, and concentrated areas of poverty and would promote the availability of affordable housing in low-poverty, nonminority areas where appropriate. Grantees' use of recovery funds must meet accessibility standards, provide reasonable accommodations to persons with disabilities, and take into consideration the functional needs of persons with disabilities in the relocation process.²⁹

To supplement the *Federal Register* notices, HUD issued guidance and provided training on serving vulnerable populations to aid grantees in developing action plans. For example, HUD's *Disaster Impact and Unmet Needs Assessment Kit*, referenced in the 2018 and 2016 *Federal Register* notices, states that grantees must seek to understand the condition of the most vulnerable populations. In addition, HUD conducted a 2016 webinar with a section on outreach to vulnerable populations that focused on people with limited English proficiency. It included strategies for reaching these populations, noting that they may be the most in need of resources and the most difficult to reach.

HUD officials also told us they have been developing a Citizen Participation and Equitable Engagement Toolkit that they plan to release in November 2021 to help ensure that grantees have the knowledge and capacity to comply with CDBG-DR citizen participation requirements.³⁰ These requirements are intended to ensure that members of the public have an opportunity to participate in the planning, implementation, and assessment of CDBG-DR programs and projects. The toolkit will provide additional guidance and resources to CDBG-DR grantees by outlining best practices for community participation and outreach to members of

²⁸The Fair Housing Act's protected classes are race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, and disability.

²⁹Grantees also must promote the availability of affordable housing in low-poverty, nonminority areas, where appropriate.

³⁰Requirements and waivers of citizen participation requirements specific to CDBG-DR grants may be found in the applicable *Federal Register* notices.

protected classes and using data to ensure that protected classes and vulnerable populations are being reached. According to officials from HUD's Office of Fair Housing and Equal Opportunity (FHEO), experience has shown that significant barriers exist that impede the participation of members of protected classes and vulnerable populations in CDBG-DR programs.

When reviewing draft action plans, HUD makes suggestions to help grantees better address how they plan to serve vulnerable populations. FHEO reviews draft CDBG-DR action plans from a civil rights perspective, including reviewing the unmet needs of vulnerable persons and how the grantee intends to allocate CDBG-DR financial resources to them. According to officials from this office, draft action plans typically require revisions. HUD may make comments for improvements by, for example, suggesting that grantees (1) clarify the population groups defined as vulnerable populations or protected classes; (2) emphasize the effect of planned uses of CDBG-DR funds on persons in protected classes; and (3) ensure effective public participation, including conducting outreach to traditionally underserved populations and providing access to information about disaster recovery programs to persons with limited English proficiency and persons with disabilities.

Furthermore, HUD issued supplemental guidance on CDBG-MIT that CDBG-DR grantees could use to help them meet the requirements to serve vulnerable populations. Community Planning and Development, FHEO, and Office of General Counsel officials jointly developed the *CDBG-MIT Action Plan and FHEO Requirements* to walk grantees through each requirement to serve vulnerable populations.³¹ For instance, the guidance suggests that housing for vulnerable populations may have a higher concentration of persons with disabilities. It recommends grantees describe in their CDBG-MIT action plans how their mitigation measures will address the physical accessibility and supportive services needs of persons with disabilities.

³¹HUD officials also provided a webinar on this guidance.

Grantees We Reviewed Assist Vulnerable Populations but Report Limited Demographic Data to HUD

Grantees Serve Low- and Moderate-Income Persons and Populations with Additional Vulnerabilities

The six grantees in our sample use CDBG-DR grants to serve vulnerable populations, including lower-income populations and populations with additional vulnerabilities. They said they do so by complying with the low- and moderate-income requirement and prioritizing assistance to meet the unmet needs of lower-income populations whose age, disability, or other factors make them particularly vulnerable after a disaster.

Housing for Low- and Moderate-Income Persons

We reviewed action plans for the six grantees and found that all six grantees plan to use a percentage of their CDBG-DR funds to implement housing activities that benefit low- and moderate-income persons.³² Five grantees allocated almost half or more of their CDBG-DR funds to housing activities as described in their action plans and budgets.³³ Housing activities generally include rehabilitating or reconstructing damaged homes or affordable housing units, reimbursing homeowners and property owners for repair costs, buying out or acquiring homes in flood zones or areas vulnerable to repeated disasters, providing short- and long-term rental assistance while homes are reconstructed or repaired, and constructing affordable housing.

For example, the Florida Housing Repair Program assists lower-income homeowners and owners of affordable rental properties with repair, reconstruction, or replacement of damaged housing units; provides temporary housing assistance to owners and renters; and offers voluntary buy-out or acquisition of severely damaged homes. Similarly, the Restore Louisiana Homeowner Rehabilitation, Reconstruction, and

³²We focused on housing activities because the February 2018 *Federal Register* notice required grantees to primarily use their initial allocation to address unmet housing needs.

³³The sixth grantee, the U.S. Virgin Islands, allocated about 53 percent of its CDBG-DR funds to infrastructure, based on its assessment that the unmet need for infrastructure was more than five times greater than the unmet need for housing.

Reimbursement Program covers costs for repair or replacement of damaged homes and funds voluntary buy-out or acquisition of homes on a limited basis for low- and moderate-income individuals and others with urgent needs.

Housing for Low- and Moderate-Income Persons with Other Vulnerabilities

Grantees in our sample said they assist low- and moderate-income persons with other vulnerabilities by prioritizing housing assistance to these groups. Florida, Louisiana, and Puerto Rico all prioritize homeowner assistance to vulnerable populations such as the elderly and persons with disabilities. As stated in its action plan, Florida prioritizes assistance to the most vulnerable populations because funding is limited, particularly early in implementation when the grantee has only received the first allocation of funds. New Jersey and Texas have activities that include assistance to individuals in need of permanent supportive housing and at risk of homelessness. As shown in table 1, grantees also use CDBG-DR funds to provide additional support to vulnerable populations and address recovery needs specific to their communities.

Table 1: Planned Activities Using CDBG-DR Funds That Assist Low- and Moderate-Income Persons with Other Vulnerabilities

Grantee	Action plan activities
Florida	<ul style="list-style-type: none"> The Housing Repair Program prioritizes households with members over age 62, households with children under age 18, households with members with disabilities, and persons who have been displaced from Puerto Rico and the U.S. Virgin Islands and are permanently resettling in Florida.
Louisiana	<ul style="list-style-type: none"> The Restore Louisiana Homeowner Program prioritizes low- and moderate-income applicants with major or severe storm damage who do not have flood insurance, and have a household member age 62 or over or with a disability. Restore Louisiana Rental Housing Programs provide property owners with a loan to repair existing rental units if they rent these properties to families that qualify for affordable housing and they support the development of new affordable rental housing in partnership with local governments and housing authorities. The Rapid Rehousing Program provides affordable housing and support services to displaced and low- and moderate-income households. The Safe Haven Program serves individuals experiencing homelessness who also have serious mental health issues.
New Jersey	<ul style="list-style-type: none"> The Sandy Special Needs Housing Fund allocates funds to the New Jersey Housing and Mortgage Finance Agency for the construction of quality, permanent supportive housing for special needs populations (such as people with mental, physical, or developmental disabilities).
Puerto Rico	<ul style="list-style-type: none"> The Home Repair, Reconstruction, or Relocation Program prioritizes the intake and review of applicants who are 65 and older, have at least one person with a disability in the home, or have significant property damage. The Rental Assistance Program provides temporary rental assistance to applicants age 60 or over who are experiencing homelessness or are at risk of becoming homeless. The Social Interest Housing Program provides funding for nonprofits and nongovernmental organizations to develop housing for special needs populations such as persons experiencing homelessness, senior citizens, victims of domestic violence, persons with intellectual or physical disabilities, and persons living with HIV/AIDS.
Texas	<ul style="list-style-type: none"> Public services are available under the Homeowner Assistance Program to prevent homelessness. These services are limited to low- and moderate-income persons and include short-term mortgage assistance, utility assistance, and tenant-based rental assistance.
U.S. Virgin Islands	<ul style="list-style-type: none"> The Services for Vulnerable Populations Program provides grants to social services organizations to enhance support services for persons experiencing homelessness, at-risk youth, victims of domestic violence, the elderly, and persons with disabilities. The Rehabilitation, Reconstruction, or New Construction of Public Facilities Program supports the restoration of two nursing facilities for the elderly that also serve as emergency special needs shelters during disasters.

Source: GAO review of selected Community Development Block Grant Disaster Recovery (CDBG-DR) grantees' action plans. | GAO-22-104452

Grantees Collect Demographic Data on Applicants but Are Only Required to Report Certain Data on Beneficiaries to HUD

The six grantees in our sample collect income and other demographic data on housing program applicants but are required to report only certain data fields to HUD, and only on program beneficiaries (rather than all

applicants). Through *Federal Register* notices, HUD requires CDBG-DR grantees to collect data such as the number of low- and moderate-income persons served and the gender of single-headed households, race, and ethnicity for activities that directly benefit households or individuals (such as housing).³⁴ Grantees report these data to HUD in DRGR, a web-based system used to automate the management of CDBG-DR program requirements.³⁵ As described in the DRGR manual, grantees report on activity outcomes and accomplishments, meaning that DRGR only captures data on beneficiaries served. Although grantees are required to collect certain data on applicants, DRGR does not capture data on applicants who submitted an application or who are approved and have home repairs or reconstruction in progress. Data submitted by grantees on the progress of recovery activities are captured in quarterly performance reports that HUD reviews and approves.

According to documentation we reviewed, the six grantees collect data on applicants' income, gender, race, and ethnicity for housing activities. The grantees collect these data through their application and intake process.

The 2016 and 2017 grantees have chosen to collect additional demographic data on applicants, such as age, disability, and in some instances, preferred language. In general, the grantees use these additional data for internal program management. Florida officials said they use them to prioritize assistance to the vulnerable populations identified in their action plan, such as lower-income households with members who are elderly or have young children or a disability. Texas officials said they use the data to plan their marketing efforts and compare the demographics of the applicant pool to regional

³⁴The March 2013 *Federal Register* notice for Hurricane Sandy grantees, the November 2016 *Federal Register* notice for Louisiana, and the February 2018 *Federal Register* notice for the 2017 grantees require grantees to maintain data on the racial, ethnic, and gender characteristics of persons who are applicants for, participants in, or beneficiaries of the program. The February 2018 *Federal Register* notice also requires grantees to report these data in the DRGR system at the activity level. 78 Fed. Reg. 14329, 14341 (Mar. 5, 2013); 81 Fed. Reg. 83254, 83265 (Nov. 21, 2016); and 83 Fed. Reg. 5844, 5856 (Feb. 9, 2018).

³⁵The requirements for data reporting also were contained in a prior version of the DRGR manual. The requirements are not explicitly stated in the most recent version. According to HUD, the manual was revised in 2020 in recognition of other HUD programs now using DRGR, and the revisions were focused on providing instructional information rather than on articulating requirements.

demographics.³⁶ Harris County officials said they use application data and information from meetings or telephone calls to determine an applicant's preferred language, provide households with reasonable accommodation, and refer applicants to resources that can assist with other unmet needs, such as healthcare. Puerto Rico officials said they collect disability information for one housing program to prompt the applicant to request reasonable accommodations needed in their repaired or rebuilt home.

Three grantees (Florida, Louisiana, and U.S. Virgin Islands) said they capture the data in internal reports, and the Virgin Islands share the reports with HUD on a monthly basis. Louisiana publishes the reports on its public website. Similarly, Texas makes demographic data on approved applicants for its largest housing program publicly available on its website. Grantees said that with the exception of income, the other demographic fields are generally self-reported, so some data may be missing or incomplete. Table 2 shows examples of the types of data in Louisiana's monthly reports and published on Texas' website for the Homeowner Assistance Program.

³⁶Examples of Texas' marketing efforts include using television, radio, and print media to advertise programs and maintaining a public website with program information.

Table 2: Examples of Publicly Available CDBG-DR Data for Louisiana and Texas

Louisiana	Texas
<ul style="list-style-type: none"> Number of applications submitted by low- and moderate-income persons 	<ul style="list-style-type: none"> Percentage of assistance spent on low- and moderate-income persons
<ul style="list-style-type: none"> Number of applications submitted by adults 62 and older or those with a disability 	<ul style="list-style-type: none"> Area median family income of approved applicants
<ul style="list-style-type: none"> Race of persons receiving assistance 	<ul style="list-style-type: none"> Race and ethnicity of approved applicants
<ul style="list-style-type: none"> Grant award amounts by parish 	<ul style="list-style-type: none"> Household characteristics of approved applicants, such as female head of household, households with children under 18, and households with members 65 and older

Source: Louisiana and Texas Community Development Block Grant Disaster Recovery (CDBG-DR) data. | GAO-22-104452

In addition, as the result of a Fair Housing Act complaint, a voluntary compliance agreement between HUD and New Jersey requires the state to report quarterly to HUD and the complainants on the status of applications for the Reconstruction, Rehabilitation, Elevation, and Mitigation and Low- and Moderate-Income homeowner programs and the units and projects funded through multifamily rental programs.³⁷ New Jersey must provide data on application status, income, level of English proficiency, race, ethnicity, municipality, and county for the homeowner programs, and on street address, municipality, family/senior/supportive status, and income levels served for the multifamily programs. Data for the multifamily program must be posted on New Jersey’s Sandy Recovery website.

According to leading practices we identified to promote successful data-driven performance reviews, an agency should have the capacity to collect accurate, useful, and timely performance data.³⁸ We noted that having the capacity to disaggregate data according to demographic or other relevant characteristics can aid in highlighting significant variation, which can help pinpoint problems and identify solutions. Furthermore, federal internal control standards state that management should externally communicate quality information to achieve the entity’s

³⁷In April 2013, the Latino Action Network, Fair Share Housing Center, and New Jersey State Conference of the National Association for the Advancement of Colored People filed a complaint with FHEO related to affordable housing opportunities for lower-income households whose homes were damaged or destroyed by Hurricane Sandy. The complaint resulted in a settlement agreement between HUD, the State of New Jersey, and the complainants.

³⁸[GAO-13-228](#).

objective.³⁹ External parties to these communications can include regulators, government entities, and the general public.

Although HUD collects some data on those served with CDBG-DR funds through its DRGR database, it does not track data on program applicants. In addition, grantees collect demographic data on applicants beyond what HUD requires, but this information is largely used for internal purposes and is not systematically shared with HUD or the public. According to HUD officials, HUD does not collect and publish more data because there is not a federal directive to do so. However, as discussed later in this section, there is an increased federal emphasis on better data collection and transparency. Without such data, it is difficult for HUD to fully assess whether grantees are effectively reaching the vulnerable populations their programs are intended to serve.

A National Low Income Housing Coalition report stated that data transparency is critical to helping public and private entities better identify gaps in disaster recovery services and that in the past, a systemic lack of data transparency has made it more difficult to target and distribute aid to those most in need.⁴⁰ In addition, some local and national organizations have said they need more access to data collected on CDBG-DR activities.⁴¹ Enterprise Community Partners, a national affordable housing nonprofit, testified that HUD should collect CDBG-DR data on where unmet needs were greatest and who was served, and then overlay these data with census-level data on income, race, education, and housing situation.⁴²

Officials from another organization told us program data need to be monitored throughout the grant process, and not only be used for developing the action plan. Officials from a second organization said that

³⁹[GAO-14-704G](#).

⁴⁰National Low Income Housing Coalition, *Fixing America's Broken Housing System: Part Two – Policy Framework Reform Recommendations* (Washington, D.C.: 2020).

⁴¹We selected the organizations we interviewed based on our review of their comments on grantees' action plans, online research, and input from grantee officials and other organization representatives.

⁴²*The Administration of Disaster Recovery Funds in the Wake of Hurricanes, Harvey, Irma, and Maria, hearing before the Subcommittee on Oversight and Investigations of the House Committee on Financial Services, 116th Cong.* (2019); testimony of Marion Mollegen McFadden, Senior Vice President for Public Policy and Senior Advisor, Resilience, Enterprise Community Partners.

HUD should provide ongoing supervision and monitoring to focus on vulnerable populations and ensure grantees meet Fair Housing Act requirements. An official from a third organization we interviewed said data in the grantee quarterly performance reports are not always helpful because they do not provide sufficient information—for example, they do not provide data on how long someone waited to receive assistance.

The Administration has cited the need for better data collection and transparency related to serving vulnerable populations. For example, a recent executive order noted that many federal datasets are not disaggregated by race, ethnicity, gender, disability, income, veteran status, or other key demographic variables.⁴³ Because this lack of data impedes efforts to measure and advance equity, the order established an Equitable Data Working Group to support efforts to expand and refine the demographic data available to agencies. The executive order also requires agencies to select programs and policies for a review that will assess whether underserved communities face systemic barriers in accessing benefits and determine whether opportunities are available pursuant to those policies and programs.⁴⁴ HUD officials told us in June 2021 that HUD had created a working group tasked with conducting this review but CDBG-DR would not be included.

By collecting more CDBG-DR applicant and beneficiary data, analyzing such data, and making it publicly available, HUD would better ensure grantees effectively reach intended vulnerable populations and improve transparency.

⁴³Exec. Order No. 13985, 86 Fed. Reg. 7009 (Jan. 25, 2021).

⁴⁴The executive order defines underserved communities as Black, Latino, Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; LGBTQ persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Grantees and Vulnerable Populations Can Face a Variety of Challenges

Grantees Have Difficulty Identifying and Reaching Vulnerable Populations

According to CDBG-DR grantees and organizations we interviewed, grantees experience challenges, such as collecting data on the unmet needs of vulnerable populations and reaching vulnerable populations after a disaster to provide CDBG-DR assistance. Vulnerable populations also experience barriers to accessing assistance or receiving it in a timely fashion.

Collecting Data on Unmet Needs

CDBG-DR allocations may not fully account for the needs of lower-income persons and those with additional vulnerabilities.⁴⁵ HUD bases these allocations on data and damage estimates from FEMA and the Small Business Administration. However, the FEMA data, for example, do not include data on race and ethnicity and other characteristics that help grantees identify the most vulnerable populations.

In addition, the methodologies grantees use to determine unmet needs may not fully capture the needs of lower-income communities and renters. According to a report by the National Low Income Housing Coalition, the data used for unmet needs assessments frequently underestimate the needs of the lowest-income survivors, leading to fewer resources in communities where they are needed most.⁴⁶ The report also noted that lower-income survivors often have difficulty accessing FEMA

⁴⁵Once Congress appropriates CDBG-DR funds, HUD publishes notices in the *Federal Register* to allocate the funding appropriated to affected communities based on unmet need.

⁴⁶National Low Income Housing Coalition, *Fixing America's Broken Disaster Housing System: Part One – Barriers to a Complete and Equitable Recovery* (Washington, D.C.: 2020).

programs, resulting in fewer long-term recovery benefits going to renters.⁴⁷

In a March 2019 hearing, Enterprise Community Partners testified that HUD's unmet needs calculations also should consider pre-existing factors like poverty and income, and that recovery assistance should not only be based on economic loss.⁴⁸ Similarly, in a May 2018 hearing, the Urban Institute testified that the information in FEMA's damage assessments is often limited and does not include information HUD may need to evaluate programs for their adherence to fair housing and civil rights laws.⁴⁹

Other data challenges involve the timing of data collection. One organization representative said the needs assessment is completed early in the process, so data on unmet needs may be inaccurate by the time activities start. HUD's *Disaster Impact and Unmet Needs Assessment Kit* notes that an accurate assessment may not be possible for months following a disaster because the assessment depends on the quality of the data available on the most impacted and distressed areas. The guidance says grantees therefore should analyze unmet needs on an ongoing basis. Officials from one national advocacy organization stated it is hard for local jurisdictions to collect data right after a disaster occurs, and that it would be helpful if HUD provided a standard form grantees could populate with demographic data. A standard form also could minimize the time it takes grantees to assess unmet need and develop the action plan, according to these officials

⁴⁷In our January 2010 report on the Gulf Coast hurricanes, we found that states used their broad discretion and additional flexibility to decide what proportion of their CDBG-DR funds went to homeowner units and rental units. In Louisiana and Mississippi, more homeowner units were damaged than rental units, but the proportional damage to rental stock was generally greater. However, 62 percent of damaged homeowner units were assisted and 18 percent of rental units were assisted. As a result, we recommended that Congress consider providing more specific direction on the distribution of disaster-related CDBG assistance that states are to provide for homeowners and renters. As of October 2021, such legislation had not been enacted. GAO, *Disaster Assistance: Federal Assistance for Permanent Housing Primarily Benefited Homeowners; Opportunities Exist to Better Target Rental Housing Needs*, [GAO-10-17](#) (Washington, D.C.: Jan. 14, 2010).

⁴⁸*The Administration of Disaster Recovery Funds in the Wake of Hurricanes, Harvey, Irma, and Maria*; 2019 testimony of Marion Mollegen McFadden, Senior Vice President for Public Policy and Senior Advisor, Resilience, Enterprise Community Partners.

⁴⁹*Community Development Block Grant-Disaster Recovery: Stakeholder Perspectives, hearing before the Subcommittee on Oversight and Investigations of the House Committee on Financial Services*, 115th Cong. (2018); testimony of Carlos Martin, Senior Fellow, Urban Institute.

Reaching Vulnerable Populations

Grantees may have difficulty reaching vulnerable populations after a disaster occurs. An official from a national advocacy organization said that in Puerto Rico, some communities assume that they will not benefit from a federal grant program and may not apply. Officials from Texas said many community members leave the area after a disaster and cannot be reached. The officials added that some populations generally distrust government and are reluctant to apply for federal programs. The officials said they tried to address this challenge by working closely with community organizations and elected officials in disaster-affected communities. They also prepared an outreach plan to market their largest homeowner program to the hardest-to-reach and most vulnerable communities, using data from the unmet needs assessment.

Harris County, Texas, officials said that in addition to traditional outreach methods, such as town hall meetings and community fairs, they implemented a “meeting in a box” approach to reach vulnerable populations. To implement this approach, the county provided printed program materials to organizations, such as local church groups, to raise awareness about planned recovery activities and get input on unmet needs. County staff then met with these organizations to discuss any input received.

Vulnerable Populations Face Challenges Accessing and Using CDBG-DR Assistance

According to grantees and organizations we interviewed, vulnerable populations experience challenges such as accessing transportation, dealing with language barriers, and understanding requirements when seeking CDBG-DR assistance. These populations are also less likely to have internet access and other resources that would help them access assistance and manage the recovery process. The COVID-19 pandemic has exacerbated many of these issues.

Access and Transportation Challenges

Physical access to assistance can present challenges for certain vulnerable groups, such as the elderly or people with disabilities. In one example, Florida officials responded to this challenge by setting up mobile information units in disaster-affected areas to better reach vulnerable populations that may not have access to transportation. Florida officials

told us that applicants with mobility impairments may request an at-home visit with an intake specialist. In another example, U.S. Virgin Islands officials have a tip sheet to help them identify vulnerable populations with transportation challenges. The tip sheet provides a step-by-step process for identifying communities with transportation needs by collecting information on population density, disability, and other demographic factors, and on vehicle ownership in areas with limited access to transportation. Also, New Jersey officials said limited internet access is a challenge for vulnerable populations, exacerbated by the pandemic and inability to hold in-person meetings.

Language Barriers

Those with limited English proficiency may need translation services to access resources and apply for CDBG-DR assistance. Officials from five grantees said they provide language and translation services to people with limited English proficiency.⁵⁰ To inform these services, Texas officials conducted a four-factor language analysis to identify the population's predominant languages.⁵¹ Officials used this information to translate the CDBG-DR action plan into five primary languages, and then contracted with a translation and interpreter service to provide access to American Sign Language and 19 other languages.

New Jersey officials also conducted a four-factor language analysis to inform its language assistance plan, as required by the state's voluntary compliance agreement with HUD. In addition, officials from the U.S. Virgin Islands used a four-factor language analysis with Census information

⁵⁰The sixth grantee's action plan stated the plan and substantial amendments would be translated into two languages to reach populations with limited English proficiency in affected areas. Puerto Rico officials also stated that key documents, such as their action plans and program policies and guidelines, are available in English and Spanish. They said that many HUD resources are available only in English.

⁵¹According to HUD's January 2007 *Federal Register* notice, recipients of HUD financial assistance are required to take reasonable steps to ensure access to persons with limited English proficiency. Recipients may conduct an individualized assessment of the following four factors: (1) number or proportion of persons with limited English proficiency in the population eligible for services; (2) frequency with which persons with limited English proficiency come into contact with the program; (3) nature or importance of the program; and (4) resources available to the recipient. Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 72 Fed. Reg. 2732 (Jan. 22, 2007), corrected and updated at 72 Fed. Reg. 7134 (Feb. 14, 2007); 72 Fed. Reg. 7666 (Feb. 16, 2007); and 72 Fed. Reg. 12628 (Mar. 16, 2007).

identifying persons with limited English proficiency and based on the results, decided to make documents such as information on program eligibility requirements and program applications and instructions available in Spanish. In its *Federal Register* notices, HUD requires that grantees ensure all citizens have equal access to information about CDBG-DR, including persons with disabilities and limited English proficiency in accordance with fair housing and civil rights requirements. However, language remains a barrier to accessing CDBG-DR assistance and grantees do not always translate CDBG-DR documents or provide translators at intake centers, according to the National Low Income Housing Coalition.⁵²

Difficulty Meeting Program Requirements

Grantee and organization officials told us that program requirements (including those related to documentation) can be taxing for households, particularly vulnerable populations.

- Harris County officials said households may have undocumented individuals or have delinquent taxes or child support payments that prevent them from receiving assistance. They added that lower-income households are often unable to maintain flood insurance, which is often a requirement for accessing CDBG-DR assistance.⁵³
- Puerto Rico officials said there are extensive documentation requirements to prevent fraud, waste, and abuse that may make it more difficult for vulnerable populations to apply for assistance. Officials added that they continually look for ways to streamline

⁵²National Low Income Housing Coalition, *Fixing America's Broken Disaster Housing System: Part One*.

⁵³Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) mandates the purchase of flood insurance protection for any HUD-assisted property (for example, a property with a FHA-insured mortgage) in a floodplain. The National Flood Insurance Reform Act of 1994, as amended, prohibits federal disaster assistance from being used to pay an individual for damage to any property in a floodplain if that individual previously received federal flood disaster assistance that was conditioned on maintaining flood insurance but failed to do so. 42 U.S.C. 5154a(a). To ensure that recovery resources were available to assist low-income homeowners who resided in a floodplain but were unlikely to be able to afford flood insurance, HUD (in its February 9, 2018, *Federal Register* notice) allowed grantees to provide assistance for the rehabilitation or reconstruction of a house located in a floodplain if (1) the homeowner had flood insurance at the time of the qualifying disaster and still had unmet recovery needs or (2) the household earned less than the greater of 120 percent of area median income or the national median and had unmet recovery needs.

applications and visit applicants with disabilities who face difficulty traveling to help them complete the applications.

- The Urban Institute testified that CDBG-DR recipients often get multiple requests to provide the same documentation and must produce extensive paperwork to meet the duplication-of-benefits requirement.⁵⁴ The representative noted these documentation requirements can be difficult for low-income households and likely lead to fewer completed applications or delays in receiving assistance.
- Officials from Louisiana said they help address extensive documentation requirements by building services to address the needs of vulnerable populations into their programs. For example, they provide legal services with the homeowner assistance program to help participants obtain housing titles, which are required to show property ownership.

HUD officials told us that extensive documentation can result from statutory requirements imposed on the multiple federal agencies involved in disaster recovery, as well as requirements from state grantees, such as providing a property title.

Difficulty Managing Home Reconstruction

Individuals in vulnerable populations who receive assistance from programs allocated CDBG-DR funds may have difficulty managing home reconstruction—that is, the steps involved to rebuild a home. An organization representative with prior experience administering CDBG-DR funds said vulnerable populations may have difficulty managing the reconstruction process and hiring contractors for repair work. The representative said managing home repair and reconstruction is particularly challenging for the elderly, who may be more vulnerable to fraudulent contractors.

⁵⁴*Community Development Block Grant-Disaster Recovery: Stakeholder Perspectives*; 2018 testimony of Carlos Martin, Senior Fellow, Urban Institute. When the President issues a major disaster declaration, Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act requires federal agencies providing disaster assistance to ensure that individuals and businesses do not receive disaster assistance for losses for which they have already been compensated or may expect to be compensated. 42 U.S.C. § 5155. Duplication of benefits occurs when compensation from multiple sources exceeds the need for a particular recovery purpose.

For example, the Florida action plan states that repairs and reconstruction are handled by the grantee, which hires contractors directly. Florida officials also said that because elderly persons often do not have anywhere to go while their homes are being repaired, the state developed a program to prevent homelessness by providing housing at a hotel or longer-term rental facility. Officials from Florida and Harris County, Texas, said the COVID-19 pandemic has exacerbated certain recovery activities because people, particularly the elderly, are reluctant to let inspectors or contractors into their homes. HUD officials told us most CDBG-DR grantees manage home reconstruction projects, rather than the homeowners themselves, which may help mitigate some of the challenges.

Funding Delays and Limited Grantee Capacity Affect Vulnerable Populations

Grantee and organization officials also described challenges in administering CDBG-DR, such as the timeliness of funding and limited grantee capacity that can particularly affect vulnerable populations.

Timeliness of Funding

Because of the long-term nature of CDBG-DR, compounded by the length of time required to access and administer the funds, it can take years for individuals and communities to recover. Grantee officials said the delay in funding in the aftermath of a disaster affects the most vulnerable because they typically have fewer resources to recover. In comments on an action plan, a local organization representing vulnerable populations emphasized that low- and moderate-income individuals have the fewest resources with which to relocate on their own or maintain temporary housing elsewhere for a long period. This leaves them to live in homes that may be structurally compromised or present health risks because of disaster damage. Louisiana officials stated that vulnerable populations are more likely to face duplication-of-benefits prohibitions—for example, against using FEMA funds intended for home repair for another immediate need, such as repairing a flooded car. When these individuals apply for CDBG-DR assistance for home rehabilitation, which comes much later, they may be ineligible for assistance because they already received FEMA funds. Enterprise Community Partners noted in a March 2019 hearing that delays in funding often mean that lower-income

homeowners deplete their savings or exhaust their credit to pay for repairs.⁵⁵

Limited Grantee Capacity

Grantees and vulnerable populations also may be challenged by grantee capacity. Officials at one national organization we interviewed said grantees are often under-resourced and lack the knowledge and expertise to reach the most vulnerable community members. They said grantees would benefit from conducting more advanced planning and identifying vulnerable populations before a disaster hits. A study by the National Low Income Housing Coalition found that grantees struggle to administer and oversee CDBG-DR funds, often because the amount they receive after a disaster is many times more than what they typically administer.⁵⁶ The study also noted grantees commonly struggle with contractor oversight. For example, after Hurricane Sandy, the New Jersey grantee cancelled a contract for implementation of its largest housing recovery program after 7 months. Lower-income residents complained that the contractor lost applications, incorrectly told them they were ineligible for recovery funds, and had dysfunctional offices. As a result of these issues, many applicants in need of recovery funds dropped out of the program.

In our March 2019 report on the 2017 disasters, we found that grantees made organizational changes to increase capacity to manage the large CDBG-DR grants, which historically has been a challenge, and identified significant staffing needs.⁵⁷ We recommended that HUD develop additional guidance for HUD staff to use when assessing the adequacy of the capacity and unmet needs assessments that grantees develop. As of February 2021, although HUD had taken some steps to develop additional guidance, it had not fully implemented this recommendation.

During a May 2018 hearing, the Urban Institute noted that few state and local grantees have internal expertise and experience in CDBG-DR, in

⁵⁵*The Administration of Disaster Recovery Funds in the Wake of Hurricanes, Harvey, Irma, and Maria*; 2019 testimony of Marion Mollegen McFadden, Senior Vice President for Public Policy and Senior Advisor, Resilience, Enterprise Community Partners.

⁵⁶National Low Income Housing Coalition, *Fixing America's Broken Disaster Housing System: Part One*.

⁵⁷[GAO-19-232](#).

part because of the sporadic nature of the program's funding and variations in requirements across appropriations.⁵⁸ Puerto Rico officials told us that although they could seek guidance from HUD on issues that affect vulnerable populations, such guidance is limited for grantees' subrecipients (entities that carry out CDBG-DR activities). The need to increase capacity among subrecipients and municipalities prompted the Puerto Rico officials to publish a notice of funding announcement, which aimed to provide one-on-one assistance to those subrecipients and municipalities to expedite access and use of funds.

In March 2019, we noted that because CDBG-DR does not have permanent statutory authority, its appropriations require HUD to customize grant requirements for each disaster in *Federal Register* notices—a time-consuming process that has delayed disbursement of funds.⁵⁹ We noted that this also may create challenges for grantees required to manage multiple CDBG-DR grants. Therefore, we recommended that Congress consider permanently authorizing a disaster assistance program that meets unmet needs in a timely manner. As of October 2021, Congress had not permanently authorized CDBG-DR or a similar program. We continue to believe that establishing permanent statutory authority for such a program would provide a more consistent framework for administering funds. Among other things, such a statute and associated regulations could clearly define requirements for grantees to serve vulnerable populations with program funds.

Conclusions

HUD requires CDBG-DR grantees to serve low- and moderate-income persons and other vulnerable populations with unmet needs. However, HUD requires grantees to report only limited demographic data on households served with CDBG-DR funds. The grantees we interviewed already gather additional data on both applicants and those ultimately served. By collecting, analyzing, and making publicly available additional

⁵⁸*Community Development Block Grant-Disaster Recovery: Stakeholder Perspectives*; 2018 testimony of Carlos Martin, Senior Fellow, Urban Institute.

⁵⁹[GAO-19-232](#). In May 2021, we identified factors to consider when weighing whether and how to permanently authorize a program for unmet disaster assistance needs, including (1) clarifying how the program would fit into the broader federal disaster framework, (2) clarifying the purpose and design the program to address it, and (3) considering the necessary capacity and support infrastructure to implement the program. GAO, *Factors to Consider in Authorizing a Permanent Program*, [GAO-21-569T](#) (Washington, D.C.: May 19, 2021).

demographic data, HUD and grantees could better assess whether they effectively reach the vulnerable populations their activities are intended to serve. Availability of such data also would foster transparency and accountability for delivery of assistance.

Recommendation for Executive Action

We are making the following recommendation to HUD:

The Assistant Secretary for Community Planning and Development should collect, analyze, and publish demographic data from CDBG-DR grantees on vulnerable populations who apply for and receive assistance. (Recommendation 1)

Agency Comments

We provided a draft of this report to HUD for review and comment. In its written comments, which are summarized below and reproduced in appendix III, HUD did not agree or disagree with our recommendation. It noted challenges with implementing the recommendation, but stated it would continue to research ways to use data to determine how CDBG-DR grantees serve vulnerable populations. HUD also provided technical comments, which we incorporated as appropriate.

HUD also commented on the fundamental challenges with defining vulnerable populations that we had described in our report and said it was the agency's intention to include a definition in upcoming CDBG-DR *Federal Register* notices. Specifically, HUD noted the following issues:

- Vulnerable populations vary locally and regionally by geography, markets, prevalent housing stock, tenure, history, prejudice, and policy. Underserved populations may overlap considerably with protected classes and vulnerable populations and are the result of historic and systemic patterns of engagement, treatment, and participation.
- Any definition of vulnerable populations must acknowledge that vulnerable populations vary with each disaster and region. HUD stated that it was prepared to work with its federal recovery partners to explore the feasibility of developing a shared definition of vulnerable populations.

We recognize the need for flexibility in defining vulnerable populations given the varying types and locations of disasters. We commend HUD for its stated intention to develop and include a definition in upcoming notices that acknowledges that vulnerable populations vary with each disaster and region and for its preparedness to work with federal recovery partners to explore the feasibility of developing a shared definition of vulnerable populations.

In commenting on our recommendation that HUD collect, analyze, and publish demographic data from CDBG-DR grantees on vulnerable populations who apply for and receive CDBG-DR assistance, HUD stated that implementing our recommendation would require additional staffing, system infrastructure, and privacy protocols (to protect personally identifiable information) but did not provide any specifics about the additional resources that would be required. HUD stated that before it implements our recommendation, it is considering conducting a pilot data analysis that would allow for reporting on the effects and uses of CDBG-DR funds by combining grantee data submitted in DRGR with Census data. HUD said this analysis would allow the agency to assess the value added by the additional grantee reporting requirements that we recommended. We believe this analysis would be a positive step and would help HUD identify the staffing or other resources needed to implement our recommendation.

Finally, HUD stated it is fully committed to implementing CDBG-DR and CDBG-MIT funds to reflect the principles in Executive Order 13985, which calls for advancing racial equity and support for underserved communities. It noted the order requires the Director of the Office of Management and Budget (OMB), in partnership with heads of agencies, to study methods for assessing whether agency policies and actions create or exacerbate barriers to full and equal participation by all eligible individuals. HUD said it recognized the importance of a single federal standard for collection of applicant and beneficiary demographic data and looks forward to collaborating with OMB.

The steps that HUD stated it intends to take are promising—and we understand that it may take investment and effort—but we maintain that collecting, analyzing, and publicly reporting additional demographic data would be worth that effort because it would help HUD and grantees better assess the effectiveness of CDBG-DR activities in reaching its targeted populations.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Housing and Urban Development, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8678 or pendletonj@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

A handwritten signature in black ink that reads "John H. Pendleton". The signature is written in a cursive style with a large, sweeping initial "J".

John H. Pendleton
Director, Financial Markets and Community Investment

Appendix I: Objectives, Scope, and Methodology

This report evaluates the delivery of the Department of Housing and Urban Development's (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) assistance to vulnerable populations.¹ Specifically, we examined (1) HUD's approach to assisting vulnerable populations, (2) grantees' actions to assist vulnerable populations, and (3) challenges grantees and vulnerable populations face in implementing and using CDBG-DR funds.

For our review, we selected a nongeneralizable sample of six grantees. We selected the four largest 2017 CDBG-DR grantees—Florida, Puerto Rico, Texas, and the U.S. Virgin Islands—and two additional grantees, Louisiana and New Jersey, because they were further along in implementation of their grant programs. To select those two grantees, we considered (1) grant funding amount, (2) date of grant award, and (3) average amount spent in the past 3 months. The views of the six grantees are not generalizable to other grantees but offered important perspectives.

To describe the vulnerable populations affected by the disasters in each of the six selected states and territories in our scope, we collected and analyzed data at the state or territory; county, parish, or *municipio* (municipality); and ZIP code tabulation levels using information from the decennial census and the U.S. Census Bureau's American Community Survey (ACS).² For each state or territory; area comprising CDBG-DR-eligible counties, *municipios*, or parishes; and the most impacted and

¹HUD regulations and guidance for CDBG-DR do not specifically define vulnerable populations, and definitions may vary. For this report, we focus on low- and moderate-income persons—which is statutorily defined for the CDBG program, including CDBG-DR, at 42 U.S.C. § 5302(a)(20)(A)—and other vulnerable populations such as the elderly, persons with disabilities, racial minorities, and LGBTQ individuals. Other terms also are used to describe LGBTQ and related identities, including "LGBTQIA," which stands for lesbian, gay, bisexual, transgender, queer, intersex, and asexual. However, for purposes of this report, we use the umbrella term "LGBTQ" as that is how HUD commonly refers to these populations. We recognize that persons may identify with more than one of these populations.

²We used the ACS datasets that corresponded to the datasets in the grantees' action plans, which allowed us to describe the affected population pre-disaster.

distressed area, we estimated the total population, population age 5 and older, civilian noninstitutionalized population, total number of households, total number of families, and total number of housing units. We also estimated the percentages of (1) total population by age, race, and ethnicity; (2) population age 5 and older by English language proficiency; (3) civilian noninstitutionalized population by disability; (4) households and families by income; and (5) housing units by homeownership or rental status.³

We assessed the reliability of the decennial census and ACS data we used by reviewing relevant documentation and electronically testing the data. We determined the data were sufficiently reliable for describing the characteristics of vulnerable populations in selected areas. We also reviewed a prior GAO report and a Census Bureau report to describe the intersection between low- and moderate-income populations and other vulnerable populations.

To identify HUD's approach to assisting vulnerable populations, we reviewed relevant laws and HUD regulations, *Federal Register* notices allocating CDBG-DR funds, and policies and procedures that govern CDBG-DR grants.⁴

To determine grantees' actions to assist vulnerable populations, we reviewed selected grantees' action plans (including their unmet needs assessments) for information on activities that assist vulnerable populations. We also reviewed reports in the Disaster Recovery Grant Reporting system (HUD's database for grant fund access and reporting performance) for information on how assistance is tracked, including the extent to which demographics such as the race and ethnicity of CDBG-DR beneficiaries are reported. In addition, we reviewed demographic information grantees collect on CDBG-DR program applicants and

³We did not report on median income, median value of owner-occupied housing units, or median gross rent because these values are not available at the county level.

⁴For this report, we focused on the initial *Federal Register* notices that govern the CDBG-DR funding allocated to the six grantees in our sample. These notices are 78 Fed. Reg. 14329 (Mar. 5, 2013), which allocated funding to New Jersey after Hurricane Sandy; 81 Fed. Reg. 83254 (Nov. 21, 2016), which allocated funding to Louisiana after the 2016 floods; and 83 Fed. Reg. 5844 (Feb. 9, 2018), which allocated funding to Florida, Puerto Rico, Texas, and the U.S. Virgin Islands after the 2017 hurricanes.

beneficiaries and reviewed grantees' websites to determine what information is publicly available.

We compared the data HUD collects against leading practices on successful data-driven performance reviews and federal internal control standards.⁵ We determined the information and communication component of internal controls was significant to the objective, along with the underlying principle that management should externally communicate the necessary quality information to achieve the entity's objective. We assessed the demographic data that HUD collects on grantees' programs to determine whether they included those who apply for assistance and whether this information is available to the public.

To describe the challenges grantees and vulnerable populations face, we reviewed reports and studies on disaster recovery and vulnerable populations published by selected organizations. We also reviewed grantees' documentation on efforts taken to mitigate challenges, such as outreach plans and language analyses.

To address all of our objectives, we interviewed HUD officials and representatives from our sample of six grantees.⁶ We also interviewed representatives at nine organizations that represent vulnerable populations—four national organizations (National Center for Disaster Preparedness, National Low Income Housing Coalition, Enterprise Community Partners, and SBP—previously called St. Bernard Project) and five organizations in areas served by grantees we interviewed (Ayuda Legal, Florida Housing Coalition, Louisiana Fair Housing Action Center, New Jersey Fair Share Housing Counter, and Texas Appleseed).⁷ We selected the organizations based on our review of their comments on grantees' action plans, online research, and input from grantee officials and other organization representatives.

We conducted this performance audit from July 2020 to November 2021 in accordance with generally accepted government auditing standards.

⁵GAO, *Managing for Results: Data-Driven Performance Reviews Show Promise But Agencies Should Explore How to Involve Other Relevant Agencies*, [GAO-13-228](#) (Washington, D.C.: Feb. 27, 2013); and *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁶We also interviewed officials from Harris County, which received an allocation from Texas to directly administer its own CDBG-DR activities.

⁷We were not able to interview a local organization in the U.S. Virgin Islands.

**Appendix I: Objectives, Scope, and
Methodology**

Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Demographic and Housing Characteristics of Selected Grantees

This appendix provides information on the characteristics of people, households, families, and housing units in a nongeneralizable sample of six selected states and territories that received Department of Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) grants: Florida, Texas, Puerto Rico, and the U.S. Virgin Islands (2017 hurricanes); Louisiana (2016 floods); and New Jersey (Hurricane Sandy).¹

For each grantee, we described demographic and housing characteristics of people, households, families, and housing units in three areas: (1) the entire state or territory, (2) the major disaster declaration area, and (3) the most impacted and distressed area. We used data from the Federal Emergency Management Agency to identify the counties, parishes, and *municipios* (municipalities) that received a major disaster declaration after each disaster, and HUD *Federal Register* notices to identify the smaller subset of counties, parishes, *municipios*, and ZIP codes designated by HUD as most impacted and distressed. For Florida, Louisiana, New Jersey, Puerto Rico, and Texas, we used American Community Survey (ACS) data to estimate the characteristics of people, households, families, and housing units in each area. We used the 2010 decennial census to describe the characteristics of people, households, families, and housing units in the U.S. Virgin Islands. The ACS and census data generally predate the disasters.

¹We use “2017 hurricanes” for Hurricanes Harvey, Irma, and Maria. Florida received CDBG-DR funds for Hurricane Irma, Puerto Rico and the U.S. Virgin Islands received CDBG-DR funds for Hurricanes Irma and Maria, and Texas received CDBG-DR funds for Hurricane Harvey.

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Table 3: Characteristics of People, Households, Families, and Housing Units in Florida (2012–2016), by Area Affected by Hurricane Irma

Characteristic	State and major disaster declaration area^a	Most impacted and distressed area^a
Total population (millions)	19.93	13.28
	(0)	(0.00)
Percentages of population by age		
Under age 5	5.49	5.76
	(0.01)	(0.15)
Ages 5–17	14.91	15.42
	(0.04)	(0.41)
Ages 18–64	60.55	61.65
	(0.08)	(1.64)
Ages 65 and older	19.05	17.16
	(0.05)	(0.46)
Percentages of population by race and ethnicity		
White, non-Hispanic	55.58	46.26
	(0.01)	(1.23)
Black, non-Hispanic	15.45	17.70
	(0.03)	(0.47)
Native American/Alaskan Native, non-Hispanic	0.20	0.16
	(0.01)	(0.01)
Asian, non-Hispanic	2.56	2.73
	(0.02)	(0.08)
Native Hawaiian/Pacific Islander, non-Hispanic	0.05	0.04
	(0.00)	(0.00)
Other race/two or more races, non-Hispanic	2.04	1.95
	(0.04)	(0.07)
Hispanic	24.11	31.17
	(0.00)	(0.83)
Civilian noninstitutionalized population (millions)	19.62	13.14
	(0.00)	(0.00)
Percentages of civilian noninstitutionalized population by disability		
With a disability	13.33	12.22
	(0.14)	(0.45)
With no disability	86.67	87.78
	(0.87)	(3.17)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State and major disaster declaration area^a	Most impacted and distressed area^a
Population ages 5 and older (millions)	18.84	12.51
	(0.00)	(0.00)
Percentages of population ages 5 and older by English language proficiency		
Speaks only English	71.72	63.47
	(0.27)	(1.71)
Speaks English very well	16.60	21.04
	(0.10)	(0.58)
Speaks English well	5.22	6.70
	(0.05)	(0.19)
Does not speak English well	4.06	5.41
	(0.05)	(0.16)
Does not speak English at all	2.39	3.38
	(0.04)	(0.10)
Total households (millions)	7.39	4.78
	(0.02)	(0.01)
Percentages of households by income		
Less than \$50,000	50.93	50.43
	(15.77)	(8.56)
\$50,000–99,999	29.53	29.32
	(9.14)	(4.98)
\$100,000–149,999	11.17	11.30
	(3.46)	(1.92)
\$150,000–199,999	4.02	4.21
	(1.24)	(0.72)
\$200,000 or more	4.36	4.74
	(1.35)	(0.81)
Total families (millions)	4.76	3.11
	(0.02)	(0.01)
Percentages of families by income		
Less than \$50,000	42.02	42.68
	(19.42)	(11.58)
\$50,000–99,999	33.00	32.00
	(15.25)	(8.68)
\$100,000–149,999	14.01	13.86
	(6.48)	(3.76)
\$150,000–199,999	5.24	5.37
	(2.42)	(1.46)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State and major disaster declaration area^a	Most impacted and distressed area^a
\$200,000 or more	5.72 (2.65)	6.10 (1.66)
Total housing units (millions)	7.39 (0.02)	4.78 (0.01)
Percentages of housing units by occupancy		
Owner-occupied	64.75 (20.05)	61.92 (10.51)
Renter-occupied	35.25 (10.91)	38.08 (6.46)

Source: GAO analysis of data from the Census Bureau, Federal Emergency Management Agency, and Department of Housing and Urban Development. | GAO-22-104452

^aParentheses contain 90 percent margins of error. We report a margin of error of "0" when a margin of error is exactly equal to zero and "0.00" when a margin of error rounds to 0.00 but is not exactly equal to zero.

Notes: We used the 2016 American Community Survey 5-year estimates, which reflect information collected from 2012 through 2016. A major disaster was declared for all counties in Florida after Hurricane Irma. The most impacted and distressed area is the collection of counties and ZIP codes in Florida that HUD identified as most impacted and distressed after Hurricane Irma. A household consists of all the people who occupy a housing unit. A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together.

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Table 4: Characteristics of People, Households, Families, and Housing Units in Louisiana (2010–2014), by Area Affected by the 2016 Floods

Characteristic	State	Major disaster declaration area^a	Most impacted and distressed area^a
Total population (millions)	4.60 (0)	3.54 (0)	1.60 (0)
Percentages of population by age			
Under age 5	6.77 (0.02)	6.83 (0.02)	6.81 (0.03)
Ages 5–17	17.48 (0.09)	17.93 (0.11)	18.13 (0.17)
Ages 18–64	62.85 (0.16)	62.31 (0.18)	63.09 (0.28)
Ages 65 and older	12.91 (0.08)	12.94 (0.10)	11.97 (0.15)
Percentages of population by race and ethnicity			
White, non-Hispanic	59.74 (0.01)	63.05 (0.02)	65.02 (0.03)
Black, non-Hispanic	31.91 (0.04)	30.35 (0.05)	27.91 (0.08)
Native American/Alaskan Native, non-Hispanic	0.55 (0.02)	0.45 (0.02)	0.26 (0.03)
Asian, non-Hispanic	1.63 (0.02)	1.21 (0.02)	1.63 (0.04)
Native Hawaiian/Pacific Islander, non-Hispanic	0.03 (0.01)	0.04 (0.01)	0.02 (0.01)
Other race/two or more races, non-Hispanic	1.56 (0.05)	1.52 (0.06)	1.44 (0.10)
Hispanic	4.58 (0.01)	3.38 (0.01)	3.73 (0)
Civilian noninstitutionalized population (millions)	4.50 (0.00)	3.45 (0.00)	1.58 (0.00)
Percentages of civilian noninstitutionalized population by disability			
With a disability	14.99 (0.26)	15.33 (1.14)	13.98 (1.08)
With no disability	85.01 (1.32)	84.67 (6.25)	86.02 (6.55)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State	Major disaster declaration area^a	Most impacted and distressed area^a
Population ages 5 and older (millions)	4.29 (0.00)	3.30 (0.00)	1.49 (0.00)
Percentages of population ages 5 and older by English language proficiency			
Speaks only English	91.38 (1.08)	92.56 (1.34)	91.94 (1.85)
Speaks English very well	5.73 (0.11)	5.27 (0.13)	5.68 (0.20)
Speaks English well	1.47 (0.05)	1.19 (0.05)	1.23 (0.08)
Does not speak English well	1.03 (0.04)	0.72 (0.05)	0.80 (0.07)
Does not speak English at all	0.40 (0.03)	0.26 (0.03)	0.35 (0.06)
Total households (millions)	1.72 (0.00)	1.31 (0.00)	0.60 (0.00)
Percentages of households by income			
Less than \$50,000	54.05 (15.17)	53.61 (13.63)	49.86 (18.36)
\$50,000–99,999	27.41 (7.70)	27.71 (7.05)	28.57 (10.53)
\$100,000–149,999	11.35 (3.19)	11.60 (2.95)	12.96 (4.78)
\$150,000–199,999	3.81 (1.07)	3.88 (0.99)	4.55 (1.69)
\$200,000 or more	3.38 (0.95)	3.19 (0.82)	4.06 (1.51)
Total families (millions)	1.13 (0.01)	0.88 (0.00)	0.40 (0.00)
Percentages of families by income			
Less than \$50,000	44.50 (19.66)	44.17 (19.82)	40.19 (27.10)
\$50,000–99,999	31.24 (13.80)	31.49 (14.13)	31.84 (21.47)
\$100,000–149,999	14.69 (6.49)	15.00 (6.73)	16.63 (11.22)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State	Major disaster declaration area^a	Most impacted and distressed area^a
\$150,000–199,999	5.07 (2.24)	5.10 (2.29)	5.95 (4.02)
\$200,000 or more	4.50 (1.99)	4.23 (1.90)	5.39 (3.64)
Total housing units (millions)	1.72 (0.00)	1.31 (0.00)	0.60 (0.00)
Percentages of housing units by occupancy			
Owner-occupied	66.31 (18.61)	68.78 (17.48)	68.09 (25.07)
Renter-occupied	33.69 (9.46)	31.22 (7.94)	31.91 (11.75)

Source: GAO analysis of data from the Census Bureau, Federal Emergency Management Agency, and Department of Housing and Urban Development. | GAO-22-104452

^aParentheses contain 90 percent margins of error. We report a margin of error of “0” when a margin of error is exactly equal to zero and “0.00” when a margin of error rounds to 0.00 but is not exactly equal to zero.

Notes: We used the 2014 American Community Survey 5-year estimates, which reflect information collected from 2010 through 2014 and are consistent with the data the grantee used for its action plan. The major disaster declaration area is the collection of parishes in Louisiana that received a major disaster declaration after the 2016 floods. The most impacted and distressed area is the collection of parishes in Louisiana that HUD identified as most impacted and distressed after the 2016 floods. A household consists of all the people who occupy a housing unit. A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together.

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Table 5: Characteristics of People, Households, Families, and Housing Units in New Jersey (2009–2011 and 2007–2011), by Area Affected by Hurricane Sandy

Characteristic	State and major disaster declaration area^a	Most impacted and distressed area^a
Total population (millions)	8.75 (0)	5.22 (0)
Percentages of population by age		
Under age 5	6.21 (0.00)	6.28 (0.01)
Ages 5–17	17.43 (0.06)	16.98 (0.08)
Ages 18–64	62.97 (0.10)	62.90 (0.13)
Ages 65 and older	13.40 (0.07)	13.83 (0.08)
Percentages of population by race and ethnicity		
White, non-Hispanic	59.90 (0.02)	55.64 (0.03)
Black, non-Hispanic	12.85 (0.03)	13.70 (0.04)
Native American/Alaskan Native, non-Hispanic	0.12 (0.01)	0.11 (0.01)
Asian, non-Hispanic	8.12 (0.02)	9.62 (0.03)
Native Hawaiian/Pacific Islander, non-Hispanic	0.02 (0.00)	0.02 (0.01)
Other race/two or more races, non-Hispanic	1.71 (0.05)	1.72 (0.06)
Hispanic	17.28 (0)	19.19 (0)
Civilian noninstitutionalized population (millions)	8.68 (0.00)	5.20 (0.00)
Percentages of civilian noninstitutionalized population by disability		
With a disability	9.93 (0.13)	9.68 (0.42)
With no disability	90.07 (0.92)	90.32 (3.76)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State and major disaster declaration area^a	Most impacted and distressed area^a
Population ages 5 and older (millions)	8.21 (0.00)	4.89 (0.00)
Percentages of population ages 5 and older by English language proficiency		
Speaks only English	70.79 (0.23)	66.37 (0.31)
Speaks English very well	16.89 (0.12)	19.32 (0.17)
Speaks English well	6.00 (0.07)	6.93 (0.10)
Does not speak English well	4.51 (0.07)	5.22 (0.09)
Does not speak English at all	1.80 (0.04)	2.16 (0.06)
Total households (millions)	3.18 (0.01)	1.92 (0.00)
Percentages of households by income		
Less than \$50,000	35.68 (6.91)	37.31 (7.10)
\$50,000–99,999	29.82 (5.77)	29.44 (5.60)
\$100,000–149,999	17.51 (3.39)	16.81 (3.20)
\$150,000–199,999	8.17 (1.58)	7.82 (1.49)
\$200,000 or more	8.82 (1.71)	8.63 (1.64)
Total families (millions)	2.20 (0.01)	1.31 (0.00)
Percentages of families by income		
Less than \$50,000	26.64 (9.14)	28.43 (9.89)
\$50,000–99,999	30.65 (10.52)	30.41 (10.57)
\$100,000–149,999	20.94 (7.19)	20.14 (7.01)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State and major disaster declaration area^a	Most impacted and distressed area^a
\$150,000–199,999	10.37 (3.56)	9.87 (3.43)
\$200,000 or more	11.41 (3.92)	11.15 (3.88)
Total housing units (millions)	3.18 (0.01)	1.92 (0.00)
Percentages of housing units by occupancy		
Owner-occupied	66.58 (12.89)	62.48 (11.88)
Renter-occupied	33.42 (6.47)	37.52 (7.14)

Source: GAO analysis of data from the Census Bureau, Federal Emergency Management Agency, and Department of Housing and Urban Development. | GAO-22-104452

^aParentheses contain 90 percent margins of error. We report a margin of error of “0” when a margin of error is exactly equal to zero and “0.00” when a margin of error rounds to 0.00 but is not exactly equal to zero.

Notes: We used the 2011 American Community Survey 3-year estimates (which reflect information collected from 2009 through 2011) to describe the percentages of the civilian noninstitutionalized population with and without a disability and the 2011 American Community Survey 5-year estimates (which reflect information collected from 2007 through 2011) to describe the other characteristics. Information on the disability status of the civilian noninstitutionalized population was not available in the 5-year estimates for 2007–2011. A major disaster was declared in all counties in New Jersey after Hurricane Sandy. The most impacted and distressed area is the collection of counties in New Jersey that HUD identified as most impacted and distressed after Hurricane Sandy. A household consists of all the people who occupy a housing unit. A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together.

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Table 6: Characteristics of People, Households, Families, and Housing Units in Puerto Rico (2012–2016), by Area Affected by Hurricanes Irma and Maria

Characteristic	Territory, major disaster declaration area, and most impacted and distressed area ^a
Total population (millions)	3.53 (0)
Percentages of population by age	
Under age 5	5.20 (0.01)
Ages 5–17	16.54 (0.10)
Ages 18–64	60.85 (0.18)
Ages 65 and older	17.40 (0.12)
Percentages of population by race and ethnicity	
White, non-Hispanic	0.75 (0.05)
Black, non-Hispanic	0.08 (0.01)
Native American/Alaskan Native, non-Hispanic	0.00 (0.00)
Asian, non-Hispanic	0.07 (0.02)
Native Hawaiian/Pacific Islander, non-Hispanic	0.00 (0.00)
Other race/two or more races, non-Hispanic	0.15 (0.02)
Hispanic	98.95 (0.05)
Civilian noninstitutionalized population (millions)	3.50 (0.00)
Percentages of civilian noninstitutionalized population by disability	
With a disability	21.28 (0.20)
With no disability	78.72 (0.56)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	Territory, major disaster declaration area, and most impacted and distressed area^a
Population ages 5 and older (millions)	3.35 (0.00)
Percentages of population ages 5 and older by English language proficiency	
Speaks only English	5.52 (0.09)
Speaks English very well	16.37 (0.19)
Speaks English well	15.21 (0.17)
Does not speak English well	20.94 (0.20)
Does not speak English at all	41.96 (0.30)
Total households (millions)	1.24 (0.00)
Percentages of households by income	
Less than \$50,000	82.64 (24.08)
\$50,000–99,999	13.23 (3.86)
\$100,000–149,999	2.57 (0.76)
\$150,000–199,999	0.83 (0.25)
\$200,000 or more	0.72 (0.21)
Total families (millions)	0.87 (0.00)
Percentages of families by income	
Less than \$50,000	79.67 (33.85)
\$50,000–99,999	15.43 (6.56)
\$100,000–149,999	3.05 (1.30)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	Territory, major disaster declaration area, and most impacted and distressed area^a
\$150,000–199,999	0.99 (0.43)
\$200,000 or more	0.86 (0.37)
Total housing units (millions)	1.24 (0.00)
Percentages of housing units by occupancy	
Owner-occupied	68.60 (19.99)
Renter-occupied	31.40 (9.15)

Source: GAO analysis of data from the Census Bureau, Federal Emergency Management Agency, and Department of Housing and Urban Development. | GAO-22-104452

^aParentheses contain 90 percent margins of error. We report a margin of error of "0" when a margin of error is exactly equal to zero and "0.00" when a margin of error rounds to 0.00 but is not exactly equal to zero.

Notes: We used the 2016 American Community Survey 5-year estimates, which reflect information collected from 2012 through 2016. A major disaster was declared in all municipios (municipalities) in Puerto Rico after Hurricanes Irma and Maria, and HUD identified the entire territory as most impacted and distressed. A household consists of all the people who occupy a housing unit. A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together.

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Table 7: Characteristics of People, Households, Families, and Housing Units in Texas (2012–2016), by Area Affected by Hurricane Harvey

Characteristic	State	Major disaster declaration area^a	Most impacted and distressed area^a
Total population (millions)	26.96	15.99	7.72
	(0)	(0)	(0.00)
Percentages of population by age			
Under age 5	7.31	7.33	7.41
	(0.01)	(0.01)	(0.30)
Ages 5–17	19.15	18.95	19.25
	(0.04)	(0.06)	(0.79)
Ages 18–64	62.05	63.11	62.72
	(0.07)	(0.09)	(2.55)
Ages 65 and older	11.49	10.61	10.63
	(0.04)	(0.04)	(0.44)
Percentages of population by race and ethnicity			
White, non-Hispanic	43.42	39.59	39.63
	(0.01)	(0.01)	(1.61)
Black, non-Hispanic	11.63	14.91	16.16
	(0.02)	(0.03)	(0.66)
Native American/Alaskan Native, non-Hispanic	0.23	0.20	0.20
	(0.01)	(0.01)	(0.02)
Asian, non-Hispanic	4.31	5.36	6.33
	(0.01)	(0.02)	(0.26)
Native Hawaiian/Pacific Islander, non-Hispanic	0.07	0.06	0.05
	(0.00)	(0.00)	(0.00)
Other race/two or more races, non-Hispanic	1.70	1.76	1.59
	(0.02)	(0.04)	(0.08)
Hispanic	38.63	38.13	36.05
	(0.00)	(0)	(1.46)
Civilian noninstitutionalized population (millions)	26.48	15.79	7.63
	(0.00)	(0.01)	(0.00)
Percentages of civilian noninstitutionalized population by disability			
With a disability	11.64	10.79	10.50
	(0.10)	(0.37)	(0.58)
With no disability	88.36	89.21	89.50
	(0.69)	(2.99)	(4.86)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State	Major disaster declaration area^a	Most impacted and distressed area^a
Population ages 5 and older (millions)	24.99 (0.00)	14.82 (0.00)	7.15 (0.00)
Percentages of population ages 5 and older by English language proficiency			
Speaks only English	64.81 (0.24)	64.36 (0.22)	64.05 (2.70)
Speaks English very well	21.11 (0.11)	20.87 (0.12)	20.72 (0.89)
Speaks English well	6.35 (0.05)	6.68 (0.06)	6.76 (0.30)
Does not speak English well	4.88 (0.04)	5.40 (0.06)	5.48 (0.24)
Does not speak English at all	2.86 (0.03)	2.69 (0.04)	2.98 (0.14)
Total households (millions)	9.29 (0.02)	5.59 (0.01)	2.67 (0.00)
Percentages of households by income			
Less than \$50,000	45.81 (7.68)	44.18 (5.41)	43.18 (7.92)
\$50,000–99,999	29.71 (4.98)	29.81 (3.65)	29.02 (5.32)
\$100,000–149,999	13.43 (2.25)	13.77 (1.69)	14.26 (2.62)
\$150,000–199,999	5.34 (0.90)	5.68 (0.70)	6.23 (1.15)
\$200,000 or more	5.72 (0.96)	6.55 (0.81)	7.30 (1.34)
Total families (millions)	6.45 (0.02)	3.79 (0.01)	1.87 (0.01)
Percentages of families by income			
Less than \$50,000	38.75 (10.61)	37.52 (8.42)	36.70 (12.17)
\$50,000–99,999	31.34 (8.58)	30.76 (6.90)	29.88 (9.91)
\$100,000–149,999	16.08 (4.41)	16.32 (3.66)	16.73 (5.55)

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	State	Major disaster declaration area^a	Most impacted and distressed area^a
\$150,000–199,999	6.65 (1.82)	7.08 (1.59)	7.62 (2.53)
\$200,000 or more	7.19 (1.97)	8.32 (1.87)	9.07 (3.01)
Total housing units (millions)	9.29 (0.02)	5.59 (0.01)	2.67 (0.00)
Percentages of housing units by occupancy			
Owner-occupied	61.87 (10.38)	58.91 (7.22)	61.22 (11.22)
Renter-occupied	38.13 (6.40)	41.09 (5.03)	38.78 (7.11)

Source: GAO analysis of data from the Census Bureau, Federal Emergency Management Agency, and Department of Housing and Urban Development. | GAO-22-104452

^aParentheses contain 90 percent margins of error. We report a margin of error of “0” when a margin of error is exactly equal to zero and “0.00” when a margin of error rounds to 0.00 but is not exactly equal to zero.

Notes: We used the 2016 American Community Survey 5-year estimates, which reflect information collected from 2012 through 2016. The major disaster declaration area is the collection of counties in Texas that received a major disaster declaration after Hurricane Harvey. The most impacted and distressed area is the collection of counties and ZIP codes in Texas that HUD identified as most impacted and distressed after Hurricane Harvey. A household consists of all the people who occupy a housing unit. A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together.

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Table 8: Characteristics of People, Households, Families, and Housing Units in the U.S. Virgin Islands (2010), by Area Affected by Hurricanes Irma and Maria

Characteristic	Territory, major disaster declaration area, and most impacted and distressed area
Total population (thousands)	106.41
Percentages of population by age	
Under age 5	7.05
Ages 5–17	18.35
Ages 18–64	61.08
Ages 65 and older	13.52
Percentages of population by race and ethnicity	
White, non-Hispanic	13.49
Black, non-Hispanic	66.14
Native American/Alaskan Native, non-Hispanic	0.22
Asian, non-Hispanic	1.28
Native Hawaiian/Pacific Islander, non-Hispanic	0.01
Other race/two or more races, non-Hispanic	1.47
Hispanic	17.39
Civilian noninstitutionalized population (thousands)	105.43
Percentages of civilian noninstitutionalized population by disability	
With a disability	9.84
With no disability	90.16
Population ages 5 and older (thousands)	98.91
Percentages of population ages 5 and older by English language proficiency	
Speaks only English	71.65
Speaks English very well	18.87
Speaks English well	5.18
Does not speak English well	3.61
Does not speak English at all	0.70
Total households (thousands)	43.21
Percentages of households by income	
Less than \$25,000	34.83
\$25,000–49,999	26.78
\$50,000–74,999	16.87
\$75,000–99,999	9.33
\$100,000 or more	12.19

**Appendix II: Demographic and Housing
Characteristics of Selected Grantees**

Characteristic	Territory, major disaster declaration area, and most impacted and distressed area
Total families (thousands)	26.24
Percentages of families by income	
Less than \$25,000	27.51
\$25,000–49,999	26.86
\$50,000–74,999	18.46
\$75,000–99,999	11.25
\$100,000 or more	15.92
Total housing units (thousands)	43.21
Percentages of housing units by occupancy	
Owner-occupied	47.90
Renter-occupied	52.10

Source: GAO analysis of data from the Census Bureau, Federal Emergency Management Agency, and Department of Housing and Urban Development. | GAO-22-104452

Notes: We used data from the 2010 decennial census. A major disaster was declared for the entire U.S. Virgin Islands after Hurricanes Irma and Maria, and HUD identified the entire territory as most impacted and distressed. A household consists of all the people who occupy a housing unit. A family is a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together.

Appendix III: Comments from the Department of Housing and Urban Development



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

PRINCIPAL DEPUTY ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

John H. Pendleton, Director
Financial Markets and Community Investment
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: GAO Audit – Draft Report CPD-22-104452

Dear Mr. Pendleton:

On September 13, 2021, the Government Accountability Office (GAO) issued the draft report entitled “Disaster Recovery: Better Data Needed to ensure HUD Block Grant Funds Reach Vulnerable Populations” [GAO 22-104452]. The draft report was provided to HUD for advance review and agency comment. As part of a GAO review of a range of disaster recovery issues following the 2017 disaster season, the draft report addresses 1) HUD’s approach to assisting vulnerable populations; 2) grantees’ actions to assist vulnerable populations, and 3) challenges grantees and vulnerable populations face in implementing and using CDBG-DR.

The GAO draft report includes one Recommendation, providing that the Assistant Secretary for Community Planning and Development should collect, analyze, and publish demographic data from CDBG-DR grantees on vulnerable populations who apply for and receive CDBG-DR assistance.

This letter provides agency comment on the draft report and describes the specific actions that the Department is considering to further improve the ability of CDBG-DR grantees to assist vulnerable populations impacted by a disaster.

GAO Recommendation 1: The Assistant Secretary for Community Planning and Development should collect, analyze and publish demographic data from CDBG-DR grantees on vulnerable populations who apply for and receive CDBG-DR assistance.

The Department appreciates the acknowledgment in the report that CDBG-DR funds are appropriated by Congress and implemented by HUD as block grant funding within the framework of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*). The Department also appreciates acknowledgment of the multiple requirements, strategies, and tools established by the Department to reach vulnerable populations most in need of recovery assistance. The CDBG-DR grantees featured in the review have also designed and implemented recovery programs that prioritize assistance to low- and moderate-income persons and areas.

The draft report notes that HUD has not generally defined “vulnerable populations” for purposes of its CDBG-DR *Federal Register* notices. The report should further explain that this has historically been the case due to the wide range of populations that may be impacted by

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**Appendix III: Comments from the Department
of Housing and Urban Development**

2

indiscriminate disasters.

The report should also note that HUD has led other federal agencies in the consideration and prioritization of vulnerable populations. The report might note, for example, that in the Notice of Funding Available for the award of CDBG-DR funds for National Disaster Resilience grants in 2014 (FR- 5800-N-29), HUD provided the following definition:

For purposes of this NOFA, a vulnerable population is a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources. HUD notes that research and HUD's disaster recovery experience indicate that lower-income persons are less able to recover from the effects of disasters. Further, you are required under civil rights and fair housing requirements to ensure that access to program information and benefit is not limited based on a protected class, such as race, color, national origin, religion, sex, family status, or disability.

Although there may be a general definition of socially and economically vulnerable populations that HUD could provide (related to the particular harm persons in those groups may have experienced from disasters, long-term adverse effects, limits to resilience, and risk from future disasters), specific vulnerable populations are defined in large part by local and regional disasters. The report appropriately cites research indicating that certain segments of the population do face consistent recovery challenges. However, in a disaster recovery context, socially and economically vulnerable populations are additionally defined by their resilience to adverse natural, economic, and other events, such as disasters, recessions, and government-caused displacement. There is no standard set of vulnerable populations, and their existence and concentration vary locally and regionally by geography, markets, prevalent housing stock, and tenure, history, prejudice, and policy. Underserved populations may overlap considerably with protected classes and vulnerable populations and are the result of historic and systemic patterns of engagement, treatment, and participation.

Another important distinction is the difference and similarity between groups that present considerations of equity: protected bases (classes), vulnerable populations, and underserved populations. The key distinction with respect to protected basis is the statutory foundation for prohibiting discrimination against persons on the basis of race, color, national origin, sex (including sexual orientation and gender identity), religion, familial status, and disability. Other statutes protect other bases, such as genetic information and age.

It is this Office's intention to develop and include a definition of "vulnerable populations" in upcoming *Federal Register* notices governing the allocation of CDBG-DR funds. However, the Department reiterates that the definition must also acknowledge that vulnerable populations vary with each disaster and region. HUD is prepared to work with its federal recovery partners to explore the feasibility of developing a shared definition of vulnerable populations.

The draft report recommends that the Department impose additional demographic reporting requirements on its CDBG-DR and CDBG-MIT grantees and extend those requirements to both program applicants and those receiving program assistance. The Department understands that the GAO's recommendation is directing HUD to collect data to ensure vulnerable populations are

**Appendix III: Comments from the Department
of Housing and Urban Development**

3

served. However, HUD also recognizes that it must build/supplement its own staffing infrastructure to perform a more robust analysis of existing and any potential new data and incorporate the direction to agencies for implementing the President's Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government (Executive Order 13985) following the submission of the Equity Assessment Reports. Building this infrastructure also must recognize that some beneficiaries (applicants) may be [reluctant](#) to provide demographic information out of concern for retaliation or negative treatment.

Additionally, to implement the GAO recommendation, HUD would need to create additional protocols for data collection to incorporate considerations for personally identifiable information (PII). While declining to provide demographic information does not affect grantee consideration of any CDBG-DR application, additional protocols would be required for HUD to obtain and maintain PII from its grantees. In fact, existing Privacy Act provisions have made it difficult for HUD to collect aggregate data from the Federal Emergency Management Agency (FEMA) on households who have applied, received, or were denied assistance following a FEMA data breach that occurred after Hurricane Harvey.

As mentioned in the draft report, the Department is taking action to implement Executive Order 13985. The Secretary has committed to engaging in a long-term effort to bring an equity lens to all the Department's work. HUD has submitted an equity assessment pursuant to Section 5 of the Executive Order. The overarching federal effort to increase equity as envisioned by the Executive Order will result in more coordinated and effective actions than a myriad of disparate actions by individual agencies.

HUD notes that Executive Order 13985 states that the Director of the Office of Management and Budget (OMB) shall, in partnership with the heads of agencies, study methods for assessing whether agency policies and actions create or exacerbate barriers to full and equal participation by all eligible individuals. The study should aim to identify the best methods, consistent with applicable law, to assist agencies in assessing equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation, and disability. The Department recognizes the importance of a single federal standard for applicant and beneficiary demographic data collection and looks forward to collaborating with OMB in developing standard requirements across federal programs.

The Department is fully committed to implementing CDBG-DR and CDBG-MIT funds to reflect the principles outlined in Executive Order 13985. Prior to implementing the draft report's recommendation on new reporting requirements across its CDBG-DR and CDBG-MIT grant portfolios, the Department is considering a pilot data analysis using DRGR MicroStrategy dashboards (interactive charts and graphs). These dashboards are visual displays of key metrics and trends, which are supported by one or more MicroStrategy reports available via DRGR. These interactive charts and graphs illustrate progress and program effectiveness by appropriation, grantee, and/or grant. HUD can use grantee data submitted via DRGR and overlay the data with U.S. Census data to analyze the impacts and uses of CDBG-DR funds. Currently, CPD has the ability to produce dashboards related to CDBG-DR and CDBG-MIT funding, performance accomplishments, beneficiaries (including income levels), and race and ethnicity data for applicants served. This access to data via MicroStrategy reports or dashboards may assist HUD in measuring grantee

**Appendix III: Comments from the Department
of Housing and Urban Development**

4

contributions toward meeting the unmet disaster recovery needs of low- and moderate-income persons as well as in analyzing the effectiveness of CDBG-DR and CDBG-MIT grants towards serving underserved populations. This analysis will allow HUD to better evaluate the value-added of the additional grantee reporting requirements recommended by the draft report.

As noted previously, collecting additional data from grantees, such as all applicant information (as opposed to only beneficiary data) and any additional demographic data, will require additional staffing, system infrastructure, and protocols for HUD and, presumably for CDBG-DR and CDBG-MIT grantees, in order to fully support those updates. HUD will continue to research ways to use U.S. Census data combined with grantee data to determine how vulnerable populations are served by CDBG-DR grantees.

Technical Corrections and Clarifications:

1. The report notes that “These appropriations have provided HUD the authority to waive or modify many of the statutory and regulatory provisions governing the CDBG program”. However, given the topic of the report, it is worth noting here that HUD is prohibited from waiving requirements related to fair housing, nondiscrimination, labor standards, and the environment. (page 3)
2. The second “Grantee Requirements and Vulnerable Populations” bullet should precisely reflect the instructions to grantees in the Federal Register Notice for 2017 disasters (83 FR 5850). This provision describes grantee responsibilities for estimating the unmet needs of the populations to be served:

(3) Each grantee must include a description of how it will identify and address the rehabilitation, reconstruction, replacement, and new construction of housing and shelters in the areas affected by the disaster. This includes any rental housing that is affordable to low- or moderate-income households as provided for in B.34 of section VI of this notice; public housing as provided for in B.33 of Section VI of this notice; emergency shelters and housing for the homeless; private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program; and any other housing that is assisted under a HUD program. (4) A description of how the grantee’s programs will promote housing for vulnerable populations, including a description of activities it plans to address: (a) The transitional housing, permanent supportive housing, and permanent housing needs of individuals and families (including subpopulations) that are homeless and at-risk of homelessness; (b) the prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; and (c) the special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents. Grantees must also assess how planning decisions may affect members of protected classes, racially and ethnically concentrated areas, as well as concentrated areas of poverty; will promote the availability of affordable housing in low-poverty, nonminority areas where appropriate; and will respond to natural hazard-related impacts....” (page 4)

**Appendix III: Comments from the Department
of Housing and Urban Development**

5

3. The GAO's report does not appear to cover the full range of data support provided by HUD to the grantees, or the Federal government's importance in targeting disaster relief to the hardest hit areas. For example, the report does not appear to address the Federal government's existing role in targeting CDBG-DR assistance. One hundred percent of CDBG-DR funds must be spent in the MID (most impacted and distressed) areas. (page 8)
4. Additional protected populations to be served through the use of CDBG-DR funds include families, national origin, persons with limited English proficiency, sex (inclusive of sexual orientation and gender identity). These populations should also be noted here. (page 8)
5. There are major issues in the use of the SoVI tool. Presently, SoVI aggregates legally protected characteristics with other forms of vulnerability. Thus, areas with protected populations may be afforded the same priority as areas with vulnerable groups that are not protected under fair housing and civil rights laws. The limitations of this Tool should be highlighted here. (page 8)
6. The report notes that "According to officials from FHEO, HUD is developing this toolkit because experience has shown that significant barriers exist that impede the participation of members of protected classes and vulnerable populations in CDBG-DR programs." To clarify the attribution of the comment, FHEO does not implement the CDBG-DR grants. CPD chose to fund the development of the toolkit in order to ensure that grantees have the knowledge and capacity to comply with all requirements related to Citizen Participation and provide guidance and best practices on reaching the most vulnerable. (page 10-11)
7. The report mentions the supplemental guidance on CDBG-MIT that grantees could use to help them meet the requirements to serve vulnerable populations. While the report notes that "FHEO officials developed" the guidance, it was actually a partnership between CPD, FHEO, and OGC staff. It also might be worth noting that the guidance was followed up with a live webinar training on the topic – it can be found here: <https://www.hudexchange.info/trainings/courses/fheo-requirements-on-cdbg-mit-action-plans/>. (page 11)
8. The recommendation for a pre-populated data form is not entirely clear. Is the request for HUD to provide a standard format for grantees to identify data requirements and to organize the data it collects, or is the request for HUD to provide demographic data (e.g., baseline, community-level data) in a standard format? (page 20)
9. It would be informative for GAO to address HUD's policies and resources with respect to language accessibility. HUD provides extensive guidance on the subject and translates its vital documents into languages other than English. (page 22)
10. HUD recommends that the body of the report better integrate information on the availability and utility of demographic data in the Appendix. Implicit in the body of the report is the notion that both HUD and its grantees would benefit from accessing, organizing, and analyzing this data in a systematic fashion. For example, the data can form a baseline for

**Appendix III: Comments from the Department
of Housing and Urban Development**

6

identifying the size and concentration of vulnerable populations. Furthermore, it would be constructive to show how the data collection, organization, and analysis could be tailored to reflect the grantees' separate definitions of vulnerable populations. (page 32)

Thank you for the opportunity to comment on this draft report.

Sincerely,

**JAMES
JEMISON**

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James Arthur Jemison II
Principal Deputy Assistant Secretary
for Community Planning and Development

Text of Appendix III: Comments from the Department of Housing and Urban Development

John H. Pendleton, Director

Financial Markets and Community Investment

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548

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The GAO draft report includes one Recommendation, providing that the Assistant Secretary for Community Planning and Development should collect, analyze, and publish demographic data from CDBG-DR grantees on vulnerable populations who apply for and receive CDBG-DR assistance.

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multiple requirements, strategies, and tools established by the Department to reach vulnerable populations most in need of recovery assistance. The CDBG-DR grantees featured in the review have also designed and implemented recovery programs that prioritize assistance to low- and moderate-income persons and areas.

The draft report notes that HUD has not generally defined “vulnerable populations” for purposes of its CDBG-DR Federal Register notices. The report should further explain that this has historically been the case due to the wide range of populations that may be impacted by indiscriminate disasters.

The report should also note that HUD has led other federal agencies in the consideration and prioritization of vulnerable populations. The report might note, for example, that in the Notice of Funding Available for the award of CDBG-DR funds for National Disaster Resilience grants in 2014 (FR- 5800-N-29), HUD provided the following definition:

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Although there may be a general definition of socially and economically vulnerable populations that HUD could provide (related to the particular harm persons in those groups may have experienced from disasters, long-term adverse effects, limits to resilience, and risk from future disasters), specific vulnerable populations are defined in large part by local and regional disasters. The report appropriately cites research indicating that certain segments of the population do face consistent recovery challenges. However, in a disaster recovery context, socially and economically vulnerable populations are additionally defined by their resilience to adverse natural, economic, and other events, such as disasters, recessions, and government-caused displacement. There is no standard set of vulnerable populations, and their existence and concentration vary locally and regionally by geography, markets, prevalent housing stock, and tenure, history, prejudice, and policy. Underserved populations may overlap considerably with protected classes and vulnerable populations and are the result of historic and systemic patterns of engagement, treatment, and participation.

Another important distinction is the difference and similarity between groups that present considerations of equity: protected bases (classes), vulnerable populations,

and underserved populations. The key distinction with respect to protected basis is the statutory foundation for prohibiting discrimination against persons on the basis of race, color, national origin, sex (including sexual orientation and gender identity), religion, familial status, and disability. Other statutes protect other bases, such as genetic information and age.

It is this Office's intention to develop and include a definition of "vulnerable populations" in upcoming Federal Register notices governing the allocation of CDBG-DR funds. However, the Department reiterates that the definition must also acknowledge that vulnerable populations vary with each disaster and region. HUD is prepared to work with its federal recovery partners to explore the feasibility of developing a shared definition of vulnerable populations.

The draft report recommends that the Department impose additional demographic reporting requirements on its CDBG-DR and CDBG-MIT grantees and extend those requirements to both program applicants and those receiving program assistance. The Department understands that the GAO's recommendation is directing HUD to collect data to ensure vulnerable populations are served. However, HUD also recognizes that it must build/supplement its own staffing infrastructure to perform a more robust analysis of existing and any potential new data and incorporate the direction to agencies for implementing the President's Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government (Executive Order 13985) following the submission of the Equity Assessment Reports. Building this infrastructure also must recognize that some beneficiaries (applicants) may be reluctant to provide demographic information out of concern for retaliation or negative treatment.

Additionally, to implement the GAO recommendation, HUD would need to create additional protocols for data collection to incorporate considerations for personally identifiable information (PII). While declining to provide demographic information does not affect grantee consideration of any CDBG-DR application, additional protocols would be required for HUD to obtain and maintain PII from its grantees. In fact, existing Privacy Act provisions have made it difficult for HUD to collect aggregate data from the Federal Emergency Management Agency (FEMA) on households who have applied, received, or were denied assistance following a FEMA data breach that occurred after Hurricane Harvey.

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more coordinated and effective actions than a myriad of disparate actions by individual agencies.

HUD notes that Executive Order 13985 states that the Director of the Office of Management and Budget (OMB) shall, in partnership with the heads of agencies, study methods for assessing whether agency policies and actions create or exacerbate barriers to full and equal participation by all eligible individuals. The study should aim to identify the best methods, consistent with applicable law, to assist agencies in assessing equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation, and disability. The Department recognizes the importance of a single federal standard for applicant and beneficiary demographic data collection and looks forward to collaborating with OMB in developing standard requirements across federal programs.

The Department is fully committed to implementing CDBG-DR and CDBG-MIT funds to reflect the principles outlined in Executive Order 13985. Prior to implementing the draft report's recommendation on new reporting requirements across its CDBG-DR and CDBG-MIT grant portfolios, the Department is considering a pilot data analysis using DRGR MicroStrategy dashboards (interactive charts and graphs). These dashboards are visual displays of key metrics and trends, which are supported by one or more MicroStrategy reports available via DRGR. These interactive charts and graphs illustrate progress and program effectiveness by appropriation, grantee, and/or grant. HUD can use grantee data submitted via DRGR and overlay the data with U.S. Census data to analyze the impacts and uses of CDBG-DR funds. Currently, CPD has the ability to produce dashboards related to CDBG-DR and CDBG-MIT funding, performance accomplishments, beneficiaries (including income levels), and race and ethnicity data for applicants served. This access to data via MicroStrategy reports or dashboards may assist HUD in measuring grantee contributions toward meeting the unmet disaster recovery needs of low- and moderate-income persons as well as in analyzing the effectiveness of CDBG-DR and CDBG-MIT grants towards serving underserved populations. This analysis will allow HUD to better evaluate the value-added of the additional grantee reporting requirements recommended by the draft report.

As noted previously, collecting additional data from grantees, such as all applicant information (as opposed to only beneficiary data) and any additional demographic data, will require additional staffing, system infrastructure, and protocols for HUD and, presumably for CDBG-DR and CDBG-MIT grantees, in order to fully support those updates. HUD will continue to research ways to use U.S. Census data combined with grantee data to determine how vulnerable populations are served by CDBG-DR grantees.

Technical Corrections and Clarifications:

1. The report notes that “These appropriations have provided HUD the authority to waive or modify many of the statutory and regulatory provisions governing the CDBG program”. However, given the topic of the report, it is worth noting here that HUD is prohibited from waiving requirements related to fair housing, nondiscrimination, labor standards, and the environment. (page 3)
2. The second “Grantee Requirements and Vulnerable Populations” bullet should precisely reflect the instructions to grantees in the Federal Register Notice for 2017 disasters (83 FR 5850). This provision describes grantee responsibilities for estimating the unmet needs of the populations to be served:
 - (3) Each grantee must include a description of how it will identify and address the rehabilitation, reconstruction, replacement, and new construction of housing and shelters in the areas affected by the disaster. This includes any rental housing that is affordable to low- or moderate-income households as provided for in B.34 of section VI of this notice; public housing as provided for in B.33 of Section VI of this notice; emergency shelters and housing for the homeless; private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program; and any other housing that is assisted under a HUD program.
 - (4) A description of how the grantee’s programs will promote housing for vulnerable populations, including a description of activities it plans to address:
 - (a) The transitional housing, permanent supportive housing, and permanent housing needs of individuals and families (including subpopulations) that are homeless and at-risk of homelessness; (b) the prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless; and (c) the special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/ AIDS and their families, and public housing residents. Grantees must also assess how planning decisions may affect members of protected classes, racially and ethnically concentrated areas, as well as concentrated areas of poverty; will promote the availability of affordable housing in low-poverty, nonminority areas where appropriate; and will respond to natural hazard-related impacts....” (page 4)
3. The GAO’s report does not appear to cover the full range of data support provided by HUD to the grantees, or the Federal government’s importance in targeting disaster relief to the hardest hit areas. For example, the report does not appear to address the Federal government’s existing role in targeting CDBG-DR assistance. One hundred percent of CDBG-DR funds must be spent in the MID (most impacted and distressed) areas. (page 8)

4. Additional protected populations to be served through the use of CDBG-DR funds include families, national origin, persons with limited English proficiency, sex (inclusive of sexual orientation and gender identity). These populations should also be noted here. (page 8)
5. There are major issues in the use of the SoVI tool. Presently, SoVI aggregates legally protected characteristics with other forms of vulnerability. Thus, areas with protected populations may be afforded the same priority as areas with vulnerable groups that are not protected under fair housing and civil rights laws. The limitations of this Tool should be highlighted here. (page 8)
6. The report notes that “According to officials from FHEO, HUD is developing this toolkit because experience has shown that significant barriers exist that impede the participation of members of protected classes and vulnerable populations in CDBG-DR programs.” To clarify the attribution of the comment, FHEO does not implement the CDBG-DR grants. CPD chose to fund the development of the toolkit in order to ensure that grantees have the knowledge and capacity to comply with all requirements related to Citizen Participation and provide guidance and best practices on reaching the most vulnerable. (page 10-11)
7. The report mentions the supplemental guidance on CDBG-MIT that grantees could use to help them meet the requirements to serve vulnerable populations. While the report notes that “FHEO officials developed” the guidance, it was actually a partnership between CPD, FHEO, and OGC staff. It also might be worth noting that the guidance was followed up with a live webinar training on the topic – it can be found here: <https://www.hudexchange.info/trainings/courses/fheo-requirements-on-cdbg-mit-action-plans/>. (page 11)
8. The recommendation for a pre-populated data form is not entirely clear. Is the request for HUD to provide a standard format for grantees to identify data requirements and to organize the data it collects, or is the request for HUD to provide demographic data (e.g., baseline, community-level data) in a standard format? (page 20)
9. It would be informative for GAO to address HUD's policies and resources with respect to language accessibility. HUD provides extensive guidance on the subject and translates its vital documents into languages other than English. (page 22)
10. HUD recommends that the body of the report better integrate information on the availability and utility of demographic data in the Appendix. Implicit in the body of the report is the notion that both HUD and its grantees would benefit from accessing, organizing, and analyzing this data in a systematic fashion. For example, the data can form a baseline for identifying the size and concentration of vulnerable

**Appendix III: Comments from the Department
of Housing and Urban Development**

populations. Furthermore, it would be constructive to show how the data collection, organization, and analysis could be tailored to reflect the grantees' separate definitions of vulnerable populations. (page 32)

Thank you for the opportunity to comment on this draft report.

Sincerely,

James Arthur Jemison II

Principal Deputy Assistant Secretary for Community Planning and Development

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

John H. Pendleton, (202) 512-8678 or pendletonj@gao.gov

Staff Acknowledgments

In addition to the contact named above, Paige Smith (Assistant Director), Meredith P. Graves (Analyst in Charge), Charlene Calhoon, William Chatlos, Courtney LaFountain, John McGrail, and Shenandoah Sowash made significant contributions to this report.

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