



DEPARTMENT OF
HOUSING



CDBG-DR

COMMUNICATIONS GUIDE

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PUERTO RICO DEPARTMENT OF HOUSING
CDBG-DR PROGRAM
COMMUNICATIONS GUIDE
VERSION CONTROL

VERSION NUMBER	DATE REVISED	DESCRIPTION OF REVISIONS
1	June 11, 2021	Original Version
2	September 24, 2021	Edits to include language related to advertising and public relations as allowable advertising costs per 2 C.F.R. § 200.421.

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1 Purpose

Clear and effective communication is of paramount importance for the achievement of the Community Development Block Grant for Disaster Recovery (**CDBG-DR**) and Mitigation (**CDBG-DR MIT**) programs' goals and objectives.¹ This guide ensures that the communications strategies of programs operating under CDBG-DR funds umbrella are consistent, coordinated, managed effectively, and in direct response to the diverse needs of a bona fide resident of Puerto Rico affected by Hurricanes Irma and María. This approach will serve to provide necessary, pertinent, accurate, and high-quality information about our programs and services available to residents of Puerto Rico. Untimely, our communication strategies will ensure accessibility and availability of CDBG-DR funds to eligible beneficiaries across the Island.

The CDBG-DR Communications Guide makes certain that programs are visible, accessible, and accountable to the citizens they seek to serve. Communications strategies will include a variety of tasks and methods and invaluable two-way communication techniques that will provide opportunities for feedback from our stakeholders. Communication efforts under these CDBG-DR communication initiatives, will be undertaken by the Puerto Rico Department of Housing (**PRDOH**), its subrecipients, contractors, vendors, and/or partners. The main goal of all our conscientious efforts is to enhance awareness and understanding of the needs of our citizenry, and other interested parties, and on how they will derive benefit from CDBG-DR key recovery and mitigation programs, whilst maintaining the integrity of the recovery effort and ensuring compliance with cost principles, and citizen participation guidelines, among other regulation.

Effective procedures and processes such as the ones outlined in the Related Documents section of this guide, seek to standardize the format, content, and methodologies used under all CDBG-DR communications efforts to simplify and promote citizen participation in Puerto Rico's ongoing recovery and mitigation activities. Technical assistance will be provided to assist PRDOH's employees and staff, subrecipients, contractors, vendors, and/or partners in the development of more suitable communication strategies, useful information content, and a variety of outreach efforts tailored to the particularities and customs of local communities.

The objective of this guide is to help recovery service providers present a favorable public image of all CDBG-DR programs and of all the organizations involved in any program implementation. Additionally, this guide will assist in the development of different compliance strategies to help ease citizen accessibility of information in conformity with

¹ The CDBG-DR and CDBG-MIT programs are under the umbrella of CDBG funds. For the purposes of this Policy and Guide, whenever CDBG-DR is mentioned, it is implied to include both CDBG-DR and CDBG-MIT.

the CDBG-DR Citizen Participation Plan (**CPP**).² As such, PRDOH partners, subrecipients, contractors, and vendors must follow and comply with the guidance and regulation established in this document.

2 Scope

This Communications Guide applies to PRDOH CDBG-DR's employees, staff; subrecipients, partners, contractors, subcontractors, consultants, vendors, and third parties, that work on CDBG-DR funded programs. This guide ensures communications are uniform, cohesive, and follow one consistent message.

3 Definitions

- **AFWAM Policy** – Refers to the Anti-fraud, Waste, Abuse, and Mismanagement Policy.
- **Advertising Media:** Includes magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittal, and the like. The only allowable advertising costs are those which are solely for recruitment of personnel required by the non-federal entity for performance of the CDBG-DR grant, procurement of goods and services for the performance of the Federal award, and program outreach and other specific purposes necessary to meet the requirements of the CDBG-DR grant. 2 C.F.R. § 200.421 (a)(b).
- **CDBG-DR** – Refers to Community Development Block Grant for Disaster Recovery.
- **CDBG-MIT** – Refers to Community Development Block Grant for Mitigation.
- **CDBG-DR Communications** – Refers to the CDBG-DR Communications Division. Area responsible for planning, execution, and management of CDBG-DR Program's communication activities.
- **CPP** – Refers to the CDBG-DR Citizen Participation Plan.
- **Content** – CDBG-DR program information and other elements.
- **Design** – Conception of graphic art components in communication materials.
- **FCLS** – Refers to the Federal Compliance and Labor Standards Team.
- **FHEO Policy** – Refers to the Fair Housing and Equal Opportunity Policy.
- **HUD** – Refers to the United States Department of Housing and Urban Development.

² The Citizen Participation Plan is a standalone document available in English and Spanish at the CDBG-DR website, <https://cdbg-dr.pr.gov/participacion-ciudadana/> and <https://cdbg-dr.pr.gov/en/citizen-participation/>.

- **LAP** – Refers to the CDBG-DR Language Access Plan.
- **Mass Media** – Any of the means of communication, such as television, radio, newspapers, and social media, that reaches a larger number of people.
- **OCE** – Refers to the Puerto Rico Electoral Comptroller's Office by its Spanish acronym.
- **Orientation** – An organized activity aimed at imparting information and/or instructions to improve the recipient's performance or to help the individual or group attain a required level of knowledge or skill based on preset learning objectives, or to help a potential program beneficiary understand how to apply to a program or take an action related to accessing program benefits. The main purpose is to encourage participation in all CDBG-DR Programs.
- **Outreach** – An action or an activity undertaken by PRDOH, vendors, or its partners and subrecipients to provide information or knowledge about CDBG-DR Programs or Grant Management operational efforts. Outreach is directed towards one or more stakeholder audiences, including the general public, municipalities, agencies, for-profit or non-profit organizations, private and public sector organizations, academic institutions, e.g. potential beneficiaries or stakeholders who are participating in, or who may desire to participate in a program or grant management/operational activity. Outreach can be conducted by providing services, resources, activities to promote participation, public meetings, emails, calls, social media, flyers, handouts, pamphlets, media broadcasts, and any other means with the purpose of promoting information or knowledge about a program or grant management activity. The goal of an outreach activity is not only to provide information, but to encourage action, and deepen Island-wide understanding of CDBG-DR programs to ensure that all potential beneficiaries or applicants are notified of available recovery programs or opportunities for citizen participation.
- **PII Policy** – Refers to the Personally Identifiable Information and Non-disclosure Policy.
- **PRDOH** – Refers to the Puerto Rico Department of Housing.
- **PRDOH Communications Manager** – Refers to the PRDOH staff member that oversees and manages PRDOH's communications and is the main contact to review and authorize any public facing document related to CDBG-DR Programs.
- **PRDOH leadership** – Refers to the PRDOH Secretary and immediate supporting staff.

- **Product** – Combination of images, videos, colors, designs, and/or written elements that make up one or more communication materials.
- **Public Outreach Specialist** – Refers to the PRDOH staff member that supports overall communications and processes related to CDBG-DR activities.
- **Published** – Printing, distribution, and public exposure of one or more communication materials.
- **Public Relations:** As stated in 2 C.F.R. § 200.421 (c)(d), includes community relations and means those activities dedicated to maintaining the image of the non-Federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public. The only allowable cost related to Public Relations for the Grantee are:
 - Cost that is specifically required by the Federal award;
 - Cost of communicating with the public and press regarding specific activities or accomplishments which result from the performance of the Federal award. These costs are considered necessary as part of the outreach efforts; or
 - Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.
- **RKMA Policy** – Refers to the Record-keeping, Management, and Accessibility Policy.
- **Website** – Refers to the Puerto Rico CDBG-DR Program official website: <https://cdbg-dr.pr.gov/>.
- **Social Media** – Applications or platforms that enable users to create and share content, or to participate in social networking platforms such as Facebook, YouTube, Twitter, Instagram, etc.
- **SOP** – Refers to Standard Operating Procedures.
- **Website Developer** – Refers to the programmer who is engaged in the development, update, and maintenance of the CDBG-DR website.
- **Subrecipient** – A public or private nonprofit agency, authority or organization, or community-based development organization receiving CDBG-DR funds from the recipient or another subrecipient to undertake CDBG-DR eligible activities. 24 C.F.R. § 570.500(c). It is further defined at 2 C.F.R. § 200.1, as a non-Federal entity

that receives a sub award from a pass-through entity to carry out part of a Federal program.

4 Related Documents

The following is a list of the documents referenced throughout this Policy that will provide additional guidance.

- Website Maintenance SOP;
- Communications Content Review Tool SOP (*in progress*);
- Master Calendar SOP (*in progress*);
- CDBG-DR Language Access Plan (**LAP**);³
- Regulation on the Fiscal Oversight of Public Broadcasting Expenses (Regulation No. 39 of the Electoral Comptroller's Office (**OCE**, for its Spanish Acronym)) Regulation 9215, Department of State, September 9, 2020 (hereinafter **Regulation 9215**);⁴
- CDBG-DR Branding Guidelines; and
- Waiver/Release Templates

5 Policy

PRDOH CDBG-DR Program communications efforts are an important component in maintaining public trust and credibility throughout the life cycle of any recovery or mitigation program. The development of an integrated communications strategy allows individuals to identify, quickly and effectively any CDBG-DR communications, literature, services, and/or activities. Through a uniform strategy, PRDOH aims to create and transmit a consistent on-brand clear message that positively impacts individuals, promotes awareness of all CDBG-DR Programs, and provides for positive experiences at every touchpoint.

5.1 Fair Housing and Equal Opportunity (FHEO)

PRDOH and/or its subrecipients and/or partners have the legal obligation to comply with FHEO Policies, therefore effective communications to individuals with disabilities must be ensured. To review the CDBG-DR Program's FHEO policy, please visit <https://www.cdbg-dr.pr.gov/en/download/fair-housing-and-equal-opportunity-fheo-policy-for-cdbg-dr-programs/> (English) and <https://www.cdbg-dr.pr.gov/download/politica-de-equidad-de-vivienda-e-igualdad-de-opportunidades-para-los-programas-cdbg-dr/> (Spanish).

³ The Language Access Plan is a standalone document available in English and Spanish at the CDBG-DR website, <https://cdbg-dr.pr.gov/en/download/plan-de-acceso-al-idioma/> and <https://cdbg-dr.pr.gov/download/plan-de-acceso-al-idioma/>

⁴ This Regulation refers to any valid regulation designated by the OCE or an analog agency for the purpose of public broadcast related guidance at any given electoral period/time.

6 PRDOH CDBG-DR Program

PRDOH is responsible of handling different aspects of public relations and communications strategies for all CDBG-DR activities. The CDBG-DR Communications Division employees and staff draft are responsible for the review, and execution of all the different aspects of the CDBG-DR Marketing Plans. The CDBG-DR Communications Division has the responsibility of keeping all these marketing plans in compliance with current policies. Additionally, they provide general communications and media assistance to different Programmatic Areas, to ensure clear and effective communications across all channels. Lastly, this group of employees helps to identify, develop, and implement all CDBG-DR's outreach activities.

Thus, to guarantee that every communication initiative complies with this Policy, partners and/or subrecipients have the obligation to send all public facing documents to the CDBG-DR Communications Division for a compliance review that ensure transparency and consistency across the board.

Contact information for the CDBG-DR Communications Division:

Physical Address: PRDOH Headquarters Office
Ave. Barbosa #606 Bldg. Juan C. Cordero
San Juan, PR 00923

Mailing Address: CDBG-DR Communications Division
CDBG-DR Program
P.O. Box 21365
San Juan, PR 00928-1365

Email Address: communicationsCDBG@vivienda.pr.gov

7 Mass Media Management

Mass Media management is another key component in the Communication Division's effort of adequate supervision of the CDBG-DR Program's reputation and image. Mass Media management is an extremely effective mechanism that enables and facilitates communications with a wider audience. A successful mass media management approach implies planned and proactive Public Relations activities and efforts. The CDBG-DR Communications strives to develop and maintain positive and open channels of communication with applicants, individuals, and mass media outlets thru a successful mass media management approach and also provides guidance to our subrecipients, partners, contractors, subcontractors, consultants, vendors, and third parties, that work on CDBG-DR funded programs to productively communicate an effective message to an intended audience.

Consequently, the main purpose of the CDBG-DR Mass Media Management requirements set forth in this policy is to ensure that program information is communicated consistently and that results are accurately reported in the media, to the general public, and/or to program applicants. The CDBG-DR Communications Division will respond to requests of information from media outlets, the public and in addition, will choose to provide information proactively in response to any formal and informal requests by the media or the general public.

7.1 General Mass Media Requirements

- PRDOH CDBG-DR Communications Manager will authorize spokespersons to speak with media representatives on behalf of the CDBG-DR Program. Alternatively, PRDOH leadership may appoint a spokesperson on specific topics, recommended by the Communications Division. Staff related to the construction, administration, and execution of any program will not speak to the media on behalf of CDBG-DR without the prior authorization of the Communications Division.
- CDBG-DR Communications Division must receive accurate and timely information (at least **24 hours** of any media requests) in order to review and provide proper guidance.
- Talking points will be the starting point for all communications and these must be created by the respective CDBG-DR Program or division with the prior authorization of the Communications Division.
- Spokespersons who communicate with the general public on behalf of the CDBG-DR Programs, will ensure that the information they intend to provide is based on the Communications Division approved talking points and, in case of uncertainty, will refer the inquiry to the PRDOH Communications Division for proper management.
- Every public communication effort, whether verbally, in writing, electronic, or in the form of promotional materials, will need to comply with the Communications Guide at all times.
- Under no circumstances, any personally identifiable information (**PII**) will be made public, such as telephone numbers, home addresses, or personal email addresses of any participant of the recovery or mitigation programs operating under the CDBG-DR Program.
- Subrecipients must take steps to ensure effective communication with people with disabilities or with special needs; and enable the use of assistive technology or language in compliance with their right to access information; for example:
 - Sign language and/or interpreters;
 - Braille materials;
 - Teletype (**TTY**) telephone number;
 - Bilingual staff for real time translation;

- Closed captions;
 - Materials available in English and Spanish;
 - Different ways of communication (Email address, postal address, phone numbers, website);
 - Wheelchair accessible locations; and
 - Any other accommodations, as requested and/or necessary.
- All vital information will be published in the common languages predominately used in Puerto Rico, which include Spanish and English, and all programs will comply with PRDOH's LAP. The LAP can be accessed at <https://www.cdbg-dr.pr.gov/en/download/plan-de-acceso-al-idioma/> (English) and <https://www.cdbg-dr.pr.gov/download/plan-de-acceso-al-idioma/> (Spanish).
 - Insert "tag lines" on all printed English outreach materials indicating the availability of Spanish translation and interpretation services by PRDOH for its internally conducted activities, and by its CDBG-DR subrecipients. The same will be done on all printed Spanish outreach materials which shall indicate the availability of English translation and interpretation services by PRDOH.

8 Communications and Materials Review

A strong and cohesive message is crucial for the consistency of a program's purposes and objectives. Likewise, it enhances the effectiveness of any communication strategy implemented by the program administrators. Therefore, a communications review process off all these communications strategies is needed for assurance of message cohesiveness and transparency amid program stakeholders and participants. As part of this strategy, all communication efforts intended for the promotion of the portfolios of the different recovery or mitigation programs must be reviewed by the Communications Division. Subrecipients and partners must work collaboratively with the Communications Division to develop effective communications materials and design effective outreach strategies. Contractor and vendors are not required to submit any communication efforts provided by the CDBG-DR programs for content information review because it is presumed that the provided communication material has the approval of the Communications Division.

PRDOH collaboration with Program Areas, CDBG-DR Communications Division, and the Federal Compliance & Labor Standards Team (**FCLS**), and other programmatic divisions, ensures that:

- Marketing and program materials comply with PRDOH's LAP;
- Public relations, outreach and communications events, webinars, online events, public facing activities and any other public effort that involves the usage of the CDBG DR Program's logos, needs to be approved by the Communications Division before launching any promotion via any media channel.

- Marketing materials and outreach strategy can be reasonably expected to positively influence potential applicants and/or stakeholders (as applicable), and effectively target the identified hard to reach and underserved populations;
- Evaluation of program participation to understand effectiveness of marketing and outreach; and
- All communication executions and messaging should appeal and clearly communicate programs objectives, according to the specific target audiences for each program or effort and should follow branding guidelines, logo usage and placement of mandatory elements that need to be included in all communications/outreach materials (printed or digital) as specified in the Branding Guidelines.
 - CDBG DR and Puerto Rico Department of Housing logos need to be placed in a privilege position allowing the audience to identify the effort that is being promoted as funded by the CDBG DR Program.

PRDOH has established the Content Review Tool as the main platform to submit any outreach material for revision. A standard operating procedure (SOP), titled the "Communications Material Review Process", has been developed to submit and regulate the form and channels in which communication materials for or about CDBG-DR programs are requested to be reviewed and/or provided. All communication materials must be submitted at:

- https://horne2.outsystemsenterprise.com/CDCA_TH/Login.aspx

It is imperative for a proper use of this tool, that the Subrecipient or Partners create a unique account for content submissions and follow the steps outlined in the SOP document to execute the review process established by the Communications Division. The account should be monitored regularly since confirmations, updates and other important information will be sent by the Communications Division in regard to all submissions. The Communications Material Review Process will constitute the only guided procedure by which all communications materials on all CDBG-DR programs are submitted to the Communications Division for compliance review.

Any alteration of the Communications Material Review Process shall be the direct result of a determination by the PRDOH Communications leadership and the PRDOH CDBG-DR Communications Manager.

8.1 Programmatic Requirements:

- The Programmatic Area must deliver at least a draft of the program guidelines prior to the program release date to the CDBG-DR Communications Division. The delivery of the draft or completed guidelines should be complemented with

supplementary material provided by the program such as, talking points, frequently asked questions (**FAQs**), one pager, maps and/or any other document.

- CDBG-DR Communications Division will provide a draft of the marketing and promotional materials to the Programmatic Area for review and confirmation by the corresponding program. These materials will be used in accordance with the Program's Communications plan.
- All written advertisements for housing programs will include the fair housing and equal opportunity logo and statement or slogan on the letterhead or elsewhere displayed in a prominent location.
- The insertion of "tag lines" on printed outreach materials or program forms indicating the availability in English/Spanish translations and interpretation services by PRDOH and its subrecipients.
- The marketing and promotional materials produced during an election year, must comply with Regulation 9215.

9 Program Launch

CDBG-DR funded programs are large and complex, requiring a significant amount of efforts and documentation to accomplish the diverse activities necessary for program implementation and management.

9.1 General Program Launch Requirements

- Meetings must be held between the members of the Programmatic Area and the Communications Division, prior to program launch. Coordination with the Communications Division will help amplify the message and cross-promote programs through different channels.
 - The objective of these meetings is to confirm or adapt the communications strategies devised in the Communications Master Plan.
 - Another meeting objective is to finalize and confirm the communications plan, communications strategies, and materials prior to program launch.
- The collaboration between the members of the Programmatic Areas and the Communications Division must follow the procedures established in the Communications Material Review Process SOP throughout the duration of the program.
- Adaptations of communications strategies produced as a result of these meetings, must comply with the CDBG-DR Branding Guidelines.
- Communications strategies produced during an election year, must comply with Regulation 9215.

10 Website

The CDBG-DR website is a vital part of the program's communication efforts; it is not only the virtual face of the project; it also serves regulatory requirements. As part of the requirements set forth in Federal Register Vol. 83 No. 28 (February 9, 2018), 83 FR 5844,⁵ PRDOH is to provide a comprehensive disaster recovery website. PRDOH as grantee is responsible for the development of the CDBG-DR official public website. The CDBG-DR Program, under the leadership of PRDOH, is responsible for the creation and maintenance of new/updated content for the CDBG-DR Program website: www.cdbg-dr.pr.gov. This public website is a standalone webpage separate from the official website of PRDOH. The CDBG-DR Program's website contains the Action Plan and all its amendments, as well as all policies, procedures, performance reports, citizen participation requirements, and activity/program information (including program guidelines), contracts, procurements, and Notices of Funding Availability (**NOFA**'s). It also serves as a medium for public comments input and provides timely communications to current and prospective applicants.

10.1 General Website Requirements

The following are general requirements, tasks or principles by which different processes are executed in relation to the upkeep of the CDBG-DR website:

- PRDOH's CDBG-DR Program website and all program information is available in both Spanish and English.
- The Website Maintenance SOP is the only means by which the CDBG-DR website is edited and updated.
- The CDBG-DR website is tested on a monthly basis to ensure that it meets the expectations of its intended audience, the requirements of the Citizen Participation Plan, that links are active, and that all content is up to date.
- Any alteration of the Website Maintenance Process shall be only the direct result of a determination by PRDOH Communications leadership and the PRDOH CDBG-DR Communications Manager
- The CDBG-DR Communications Division will be responsible for notifying all updates, such as content, links, texts, images, graphic arts design changes to the procured website development and maintenance vendor.
- Website content including information regarding housing programs, applications, registrations, and other housing program-related information shall conspicuously display, in English and in Spanish, the Fair Housing poster, as well as the Equal Opportunity logo, statement, or slogan, and description.

⁵ Website requirements are included in 83 FR 5844 and subsequent Federal Register notices for CDBG-DR funds allocated to Puerto Rico for Hurricanes Irma and María.

- CDBG-DR documentation, including HUD approved documents, program guidelines, policies and procedures must be previously approved by the CDBG-DR Compliance Division.
- The online content and website design produced as a result of these requirements, must comply with the CDBG-DR Branding Guidelines.
- The online content and website design produced during an election year must comply with Regulation 9215.

10.2 Website Privacy Policy

The CDBG-DR Website Privacy Policy describes how PRDOH handles information, collected through the CDBG-DR website. It summarizes the practices carried out in relation to the information collected from users who access the Website or who voluntarily share personal information through the Website. It informs the user of:

- What information is automatically collected;
- Why that information is collected and the use that it is given;
- With whom that information is shared with; and
- Security measures used to protect the collected information.

The Website Privacy Policy is both a published statement and a standalone document available at the CDBG-DR website, <https://www.cdbg-dr.pr.gov/en/download/website-privacy-policy/> (English) and <https://www.cdbg-dr.pr.gov/download/politica-de-privacidad-del-portal/> (Spanish).

10.3 Website Requirements for Subrecipients

Subrecipients may choose to maintain a website regarding disaster recovery activities assisted with CDBG-DR funds. The following are requirements that all Subrecipients' website must follow:

- Provide citizens easy and quick access to available services and key contacts;
- Information must be available in both English and Spanish;
- Follow PRDOH CDBG-DR Program Branding Guidelines in regards to CDBG-DR Program logos, color palette, and templates;
- Include links to the official PRDOH CDBG-DR Program's websites: <https://cdbg-dr.pr.gov/en/> (English) and <https://cdbg-dr.pr.gov/> (Spanish);
- Must provide accessibility options in compliance with CDBG-DR FHEO Policy;
- Website pages regarding housing programs, applications, registrations, and other housing program-related information shall conspicuously display, in English and in Spanish, the Fair Housing poster, as well as the Equal Opportunity logo statement, or slogan, and description; and
- Include information on how and where citizens and/or applicants may submit comments, complaints, and Anti-fraud, Waste, Abuse, and Mismanagement

(AFWAM) claims or issues. These sections may link back to the official PRDOH CDBG-DR website and policies:

Topic	Policy	Link to topic page (Spanish)	Link to topic page (English)
Comments (Citizen participation)	Spanish version: https://cdbg-dr.pr.gov/download/plan-de-participacion-ciudadana/ English version: https://cdbg-dr.pr.gov/en/download/citizen-participation-plan/	https://cdbg-dr.pr.gov/participacion-ciudadana/	https://cdbg-dr.pr.gov/en/citizen-participation/
Complaints	Spanish version: https://cdbg-dr.pr.gov/download/politica-sobre-presentacion-de-quejas/ English version: https://cdbg-dr.pr.gov/en/download/citizen-complaints-policy/	https://cdbg-dr.pr.gov/quejas/	https://cdbg-dr.pr.gov/en/complaints/
AFWAM	Spanish version: https://cdbg-dr.pr.gov/download/politica-afwam/ English version: https://cdbg-dr.pr.gov/en/download/afwam-policy/	https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud	<a href="https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud/IndexES<sup>6</sup">https://cdbg-dr.pr.gov/app/cdbgdrpublic/Fraud/IndexES⁶

11 Social Media

The purpose of this section is to establish a set of procedures to follow when posting new information on any social media platforms.

Social media publications must be based upon approved programmatic documentation (such as the Program Guidelines or talking points); validated and verified data, where applicable; and relevant to the development, progress, and success of a program. Publications must be aligned with the CDBG-DR branding guidelines, avoiding any editing, and inclusion of additional logos without maintaining the established program rules and designs.

⁶ AFWAM Reporting links will automatically open the CDBG-DR website in either English or Spanish. To select the desired language, refer to the upmost right-hand corner of the webpage and select "English" or "Spanish" as the desired language.

11.1 General Social Media Requirements

The following are a core set of general requirements set forth by the CDBG-DR Communications Division that must be followed when posting CDBG-DR content on social media platforms. The list is not all-inclusive, and the CDBG-DR Communications Division should be consulted should any doubt arise.

- Any social media CDBG-DR programs posting must be limited to a maximum number of 275 characters. Characters included in visuals (e.g. briefing documents, one-pagers, press releases) do not count as characters.
- All Spanish social media publications must be tagged with the hashtag #QueremosInformarteCDBGDR.
- Social media publications about any topic relating to the CDBG-DR Program must include the full name of the reference program.
- Social media publications must always include a link to the CDBG-DR Program website www.cdbg-dr.pr.gov, or the landing page website link, or a microsite, where applicable and feasible a link to the subrecipient website with prior approval of the CDBG-DR Communications Division.
- Social Media publications that include contact information (such as telephone number, email address or postal mail) must include TTY line - functional diversity phone number.
- Images, photographs, and graphics in Social Media publications must use the CDBG-DR logos and may include program logos, and subrecipient logos (as approved by PRDOH) with the following restrictions:
 - The logos of the Government of Puerto Rico or HUD will not be used without prior authorization of the CDBG-DR Communications Division.
- All of the social media content produced during an election year, must comply with Regulation 9215.

11.2 Subrecipients

Subrecipients, as implementation partners, are authorized to post information on their corresponding CDBG-DR programs social media accounts.

- They must tag the CDBG-DR social media account (e.g. Facebook, YouTube - Ex: @CDBG-DR Puerto Rico) and comply with all guidelines and requirements listed in this and other CDBG-DR Policies and Guidelines.
- Follow PRDOH CDBG-DR Program Branding Guidelines with regards to CDBG-DR Program logos, color palette, and templates.
- Follow and include all Fair Housing and Equal Opportunity requirements.

12 Citizen Participation and Responses

Partners and/or Subrecipients must comply with HUD's requirements as set forth in the CPP, which allows citizens the opportunity to provide feedback and participate in the planning and evaluation of PRDOH CDBG-DR recovery programs. The CPP is a standalone document available at <https://cdbg-dr.pr.gov/en/citizen-participation/> (English) and <https://cdbg-dr.pr.gov/participacion-ciudadana/> (Spanish).

12.1 Call Center

The CDBG-DR Program handles its customer service phone calls through a contracted call center service provider. The CDBG-DR call center handles program inquiries, complaints, comments, questions, claims, status and information requests, and additional assistance.

12.2 PRDOH and Subrecipient Call Center Requirements

- The Call Center must be staffed with bilingual (English and Spanish) employees that are able to provide services to citizens in the language of their preference;
- The Call Center must include TTY phone system;
- Individuals requesting program information or applying via the Call Center (for Subrecipients) should be informed that the particular program complies with PRDOH Policy of non-discrimination and are designed to promote fair and equal housing opportunities;
- The Call Center must handle intake of comments and/or complaints following exclusively PRDOH approved scripts and forms;
- The Call Center must communicate program information with official PRDOH CDBG-DR program data pending that the programmatic area provides the information; and
- Subrecipients must include PRDOH CDBG-DR Call Center phone numbers in their communications.

13 Cross-cutting Guidelines

Some federal and local requirements apply to all programs funded by the CDBG-DR Program. The Cross-Cutting Guidelines cover topics such as: financial management; environmental review; labor standards; acquisition; relocation; fair housing; among others. The requirements described in the above referenced Cross-Cutting Guidelines, apply to all programs described in PRDOH's CDBG-DR Initial Action Plan and its amendments. Subrecipients, contractors, vendors and/or partners must review and apply regulations and policies in accordance with the Cross-cutting Guidelines.

The Cross-Cutting Guidelines are available at <https://www.cdbg-dr.pr.gov/en/download/cross-cutting-guidelines/> (English) and <https://www.cdbg-dr.pr.gov/download/guias-intersectoriales/> (Spanish).

14 Record Keeping

Federal regulation states “[e]ach recipient shall establish and maintain sufficient records to enable the Secretary to determine whether the recipient has met the requirement of this part.” 24 C.F.R. § 570.506. The Record Keeping, Management, and Accessibility Policy (**RKMA Policy**) standardizes the rules for record management and record keeping of information about all PRDOH CDBG-DR funded programs, to ensure they are applied consistently and transparently, maximizing accountability and compliance. In addition, the RKMA Policy establishes the rules and procedures for the evaluation and process of access to public information, in accordance with federal and local laws and regulations. Subrecipients, contractors, vendors and/or partners shall have Recordkeeping policy and procedures. If they do not, they may adopt PRDOH policies as set forth in the RKMA Policy. The RKMA Policy is a standalone document available at <https://www.cdbg-dr.pr.gov/en/download/record-keeping-management-and-accessibility-policy-rkma-policy/> (English) and <https://www.cdbg-dr.pr.gov/download/politica-sobre-manejo-administracion-y-accesibilidad-de-documentos/> (Spanish).

14.1 Communications record keeping

All communications efforts must be logged on the CDBG-DR Master Calendar Tool. PRDOH and/or its partners and subrecipients have the obligation to upload on the CDBG-DR Master Calendar Tool all undertakings to disclose information about the CDBG-DR Programs via outreach and communications activities.

Outreach activities can be defined as efforts with the purpose of broadcasting information, provide knowledge, and encourage action by deepening Island-wide understanding of programs benefits and requisities. The main objective of any information sharing activity is to ensure that all potential beneficiaries and/or applicants are notified of available recovery programs or opportunities available to them and encourage community and citizen involvement in the ongoing recovery process. These communication efforts include, but are not limited to, public meetings, email communications, telephone calls, social media announcements, flyers, handouts, pamphlets, and media broadcasts.

The following are required documentation that must be uploaded to the Calendar Tool per each activity:

- Supporting documentation including, but not limited to: flyers, handouts, brochures, pamphlets, promotional/educational or training material, presentations, studies, meeting minutes, discussions, press releases, newspapers, social media posts, text messages, website notices, transcripts of radio announcements, media broadcast, marketing, advertising, email blasts, call transcripts, and others.

- Evidence of steps taken to ensure effective communications with citizens, applicants, and members of the public, in compliance with FHEO requirements.

15 Confidentiality/Personally Identifiable Information

In order to implement Federal assistance programs, PRDOH, as the CDBG-DR funds grantee, needs to collect, maintain, use, retrieve, and disseminate information related to individuals who apply for CDBG-DR funded assistance. Due to the nature of the programs, applicant's records may contain income information, insurance information housing inspection reports, and annotations of various types of assistance. Some, if not most of the information in the applicant's records is considered personally identifiable information.

PRDOH is expected to protect the information entrusted to it by people seeking CDBG-DR Program assistance. PRDOH CDBG-DR Program's employees, staff, subrecipients, partners, and contractors are obligated to undertake reasonable steps or measures to protect all confidential or sensitive information and will not, without express written authorization from the affected party, use, market, or disclose any confidential or sensitive information to third parties. PRDOH CDBG-DR's subrecipients, program partners, contractors, and subcontractors shall abide by the confidentiality and non-disclosure clause in their contracts.

The Personally Identifiable Information, Confidentiality, and Nondisclosure Policy (**PII Policy**) sets forth program policy to guarantee the right to confidentiality and the protection of sensitive information throughout PRDOH and CDBG-DR program processes. Subrecipients, contractors, vendors and/or partners shall review and protect confidential and sensitive information in accordance with the PII Policy.

The PII Policy is a standalone document available at <https://www.cdbg-dr.pr.gov/en/download/personally-identifiable-information-confidentiality-and-nondisclosure-policy/> (English) and <https://www.cdbg-dr.pr.gov/download/politica-sobre-informacion-de-identificacion-personal-confidencialidad-y-no-divulgacion/> (Spanish).

15.1 Waivers/Release for talents

Throughout the CDBG-DR Program implementation, a wide variety of documents, videos, photographs, and other informative or marketing tools will be produced. For example, PRDOH its subrecipients, contractors, subcontractors, and partners, may develop and create audiovisual material that portrays the implementation of a CDBG-DR programs. In such instances, the use of applicant's image, information, house location, and/or stories in these communication materials and/or marketing may be displayed or mentioned. Thus, stakeholders must obtain prior authorization of such individual before

including an applicant's image, information, house location, and/or story as part of their media content.

To that end, a talent release form authorizes PRDOH and Subrecipients to use a person's image, name, appearance, likeness, pictures, videos, photographs, images and/or related media, as well as to reproduce, distribute, alter, modify, exhibit, and publish them by either print or electronic means. A signed talent release is the norm and will help avoid any legal dispute in the future, even in situation when the images, story or video may be news related or as part of a video documentary production.

PRDOH and its subrecipients must obtain releases for their communications and outreach efforts. A signed release form is need before recording or photographs can be taken in places where a person can expect a reasonable degree of privacy. Likewise, a signed location release form is needed before video recording in any private property. Examples of these types of waivers are: Waiver for Marketing, Advertising, Public Relations, and/or CDBG-DR Communications Vendor to use on participants and citizens and Waiver for Contractors, Subrecipients, and for the handling and management of audiovisual material regarding CDBG-DR Programs, submitted to PRDOH or in their possession. Any questions regarding these documents shall be referred to the CDBG-DR Communications Division.

15.2 Copyrights

Copyright ownership allows the proprietor of any work or product to exercise an exclusive right to use over it. The non-Federal entity may copyright any work that is subject to copyright and was developed under a Federal award. However, the Federal Government, and HUD, reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, and otherwise use the work for Federal purposes, and to authorize others to do so. 2 C.F.R. § 200.315(b). This property standard applies to PRDOH as grantee and all of its subrecipients, partners, or contractors.

Content of CDBG-DR communications is copyrighted and may contain third-party images and/or graphics that are used with authorization. Therefore, permission must be obtained before utilizing or reproducing images and/or graphics from any CDBG-DR Program's related communications, documents, presentations, brochures, or any other media.

END OF POLICY.