



CDBG-DR Changes, Waivers, and Modifications Policy

**NEW MEXICO HOME RECOVERY PROGRAM
DEPARTMENT OF HOMELAND SECURITY AND
EMERGENCY MANAGEMENT**

This policy is effective as of 3/20/2026 and may be updated periodically to reflect program implementation and evolving guidance from the U.S. Department of Housing and Urban Development (HUD).

Version	Date	Summary Description
1.0	03/20/2026	Initial Publication



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I. PURPOSE AND SCOPE

Purpose: The purpose of this policy is to establish a compliant framework for initiating, reviewing, approving, and documenting changes, waivers, and modifications to activities, programs, and projects funded through the Community Development Block Grant – Disaster Recovery (CDBG-DR) program. All changes, modifications, and waivers shall be implemented in accordance with the Amendment Process outlined in the State of New Mexico CDBG-DR Action Plan. The Action Plan remains the binding document approved by HUD, and any inconsistency shall be resolved in favor of the Action Plan.

Scope: This policy applies to all programs, subrecipients, contractors, and partners participating in the implementation of CDBG-DR funding under DR-4795 and DR-4843. It governs the process for making changes to program budgets, project scopes, timelines, or service delivery strategies, including both substantial and non-substantial amendments to the Action Plan, as well as administrative waivers and regulatory modifications authorized by HUD or state authorities.

II. BACKGROUND

The New Mexico Department of Homeland Security and Emergency Management (DHSEM), as the grantee of CDBG-DR funds allocated by the United States Department of Housing and Urban Development (HUD), is responsible for ensuring that all changes to the approved Action Plan, as well as any project-level or administrative program modifications, are undertaken in a manner that is transparent, well-documented, and consistent with applicable federal and state regulations.

III. POLICY STATEMENT

This policy applies to all programs, subrecipients, contractors, and partners participating in the implementation of CDBG-DR funding under DR-4795 and DR-4843. It governs the process for making changes to program budgets, project scopes, timelines, or service delivery strategies, including both substantial and non-substantial amendments to the HUD-approved Action Plan, as well as administrative waivers and regulatory modifications authorized by HUD or state authorities.

IV. DEFINITIONS

Term	Definition
Action Plan	The HUD-approved Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan for the State of New Mexico, including all approved amendments. The Action



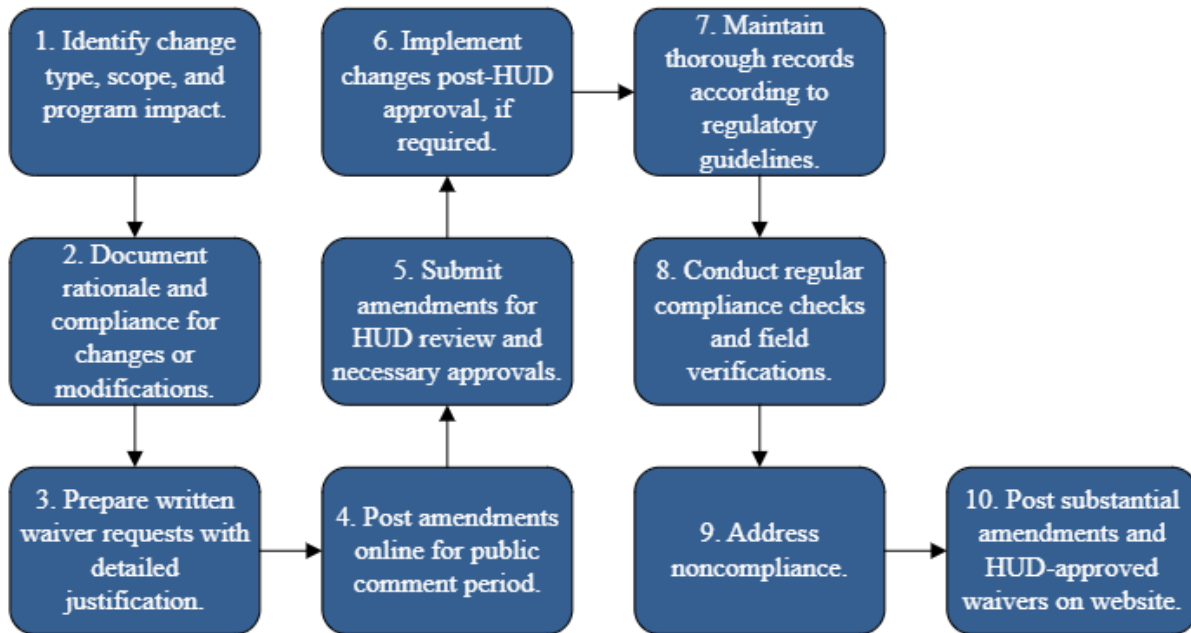
	Plan serves as the binding document that governs the use of allocated funds.
Amendment	A formal revision to the HUD-approved Action Plan. Amendments may be classified as substantial or non-substantial, consistent with HUD guidance and the Action Plan.
Administrative Waiver	A form of flexibility permitted by DHSEM within state-managed processes (e.g., internal deadlines, reporting intervals, or documentation requirements) that does not conflict with federal requirements. Administrative waivers must be documented in writing and retained in the program record.
Change	An internal adjustment to program administration, documentation, or processes that does not alter program design, eligibility, scope, or budget in a manner requiring an amendment or waiver. Changes include technical corrections, clarifications, or internal procedural updates.
Corrective Modification	A change directed by HUD, DHSEM, or an auditor in response to monitoring findings, compliance issues, or performance concerns. Corrective modifications are mandatory and must be implemented as instructed by the oversight authority.
Modification	An adjustment to program operations, activities, or projects that affects scope, schedule, or budget but remains consistent with the HUD-approved Action Plan. Modifications may be program-level or project-level and must be documented and approved in accordance with this Policy.
Non-Substantial Amendment	An amendment to the Action Plan that does not meet the thresholds of a substantial amendment. Non-substantial amendments generally include technical corrections, clarifications, or reallocations below the ten percent (10%) threshold. These amendments must be documented by DHSEM and reported to HUD in accordance with federal requirements, but do not require public comment.
Public Transparency	The obligation to provide public notice of program changes, waivers, or amendments, including posting substantial amendments and HUD-approved waivers on the official DHSEM CDBG-DR website and maintaining documentation in



	a centralized program record for review by HUD, auditors, and stakeholders.
Substantial Amendment	<p>An amendment to the Action Plan is required when one or more of the following occur:</p> <ul style="list-style-type: none"> • A change in program benefit or eligibility criteria; • The addition or deletion of an activity; • A proposed reduction in the overall benefit requirement; • An allocation or reallocation of ten percent (10%) or more of the total CDBG-DR allocation; or • A material update to an incomplete initial Action Plan submission. <p>Substantial amendments require a minimum 30-day public comment period, incorporation of public responses, and written approval by HUD before implementation.</p>
Waiver	<p>A formal exception granted by HUD to specific regulatory requirements that are not mandated by statute. Waivers must be requested in writing by DHSEM, supported with justification, and approved in writing by HUD before implementation. Waivers cannot apply to statutory requirements, including fair housing, nondiscrimination, labor standards, and environmental protection.</p>

V. PROCEDURES

Below is a general flowchart illustrating the process of making policy changes, waivers, and modifications:



This process helps ensure that all modifications to the CDBG-DR program are conducted in a transparent, lawful, and documented manner, while aligning with federal regulations and the overarching goals of disaster recovery.

Step	Process
1.0	Initiation of Changes or Modifications: <ul style="list-style-type: none"> • Substantial Amendments: Identify changes that significantly alter the scope, use, or beneficiaries of CDBG-DR funds, such as adding a new program, changing eligibility criteria, or reallocating more than five percent of the grant amount. • Non-Substantial Modifications: Implement internal adjustments that do not materially affect the intent or delivery of the funded activity, such as minor timeline changes or administrative updates. • Project-Level Changes: Determine modifications to specific subrecipient or contractor projects regarding scope, cost, or timeline. • Corrective Modifications: Respond to risks, findings, or noncompliance by reallocating funds, revising policies, or restructuring activities.
2.0	Documentation and Justification: <ul style="list-style-type: none"> • Substantial Amendments: Document the proposed change, including rationale, potential impact, and compliance with program objectives.



	<ul style="list-style-type: none"> • Non-Substantial Modifications: Require internal documentation of the change's nature and rationale. • Project-level Changes: Need formal requests with justification, updated cost or schedule information, and confirmation of valid permits. • Corrective Modifications: Must be documented promptly to comply with oversight directives.
3.0	<p>Waiver Requests:</p> <ul style="list-style-type: none"> • Regulatory Waivers: Formally request waivers from HUD for regulations not mandated by statute when compliance would hinder disaster recovery objectives. • Provide a written waiver request detailing the provision to be waived, necessity, program goal compliance, and statutory impact. • May require a public notice and comment period, depending on HUD requirements.
4.0	<p>Public Transparency and Comment:</p> <ul style="list-style-type: none"> • Substantial Amendments: Publish the proposed amendment on the official CDBG-DR website for no fewer than thirty calendar days to solicit public comment. • Compile and respond to public comments, then summarize and submit these with the amendment to HUD for approval.
5.0	<p>Submission and Review:</p> <ul style="list-style-type: none"> • Submit substantial amendments and summaries to HUD for formal review and approval. • Ensure the proposed changes are consistent with federal objectives and do not violate civil rights or environmental laws. • Non-substantial modifications and corrective changes should be documented internally without the need for HUD approval.
6.0	<p>Approval and Implementation:</p> <ul style="list-style-type: none"> • Wait for HUD's written acceptance before implementing substantial amendments and regulatory waivers. • Implement non-substantial modifications and administrative waivers with internal approval. • Ensure that no waiver or substantial amendment is applied retroactively or without formal approval.



7.0	<p>Documentation and Recordkeeping:</p> <ul style="list-style-type: none"> • Maintain all documentation related to changes, waivers, and modifications according to Title 2 CFR §200.334, retaining records for at least three years post-closeout. • Utilize a centralized change control register, recording the identifier, type, initiating party, approval path, and resolution.
8.0	<p>Compliance Monitoring:</p> <ul style="list-style-type: none"> • Conduct regular reviews, including desk and field verification, to ensure proper authorization and compliance with documentation requirements. • Review the change control and waiver tracking systems quarterly for completeness and accuracy.
9.0	<p>Addressing Noncompliance:</p> <ul style="list-style-type: none"> • Follow procedures under CFR §200.339 for corrective actions if noncompliance is discovered. • Actions may include notices of deficiency, corrective action plans, or potential ineligibility for future funding. • Refer cases to HUD’s Office of Inspector General if fraud, waste, or abuse is suspected
10.0	<p>Public Communication and Accessibility:</p> <ul style="list-style-type: none"> • Post substantial amendments and HUD-approved waivers on the New Mexico CDBG-DR Action Plan website. • Provide accessible summaries and updates to ensure public accountability and transparency.

Together, these classifications ensure that all modifications to CDBG-DR-funded programs and projects are managed transparently and in full compliance with federal expectations, while allowing for reasonable flexibility to adjust to changing circumstances and lessons learned during implementation.

VI. SCOPE OF WORK AND EVALUATION CRITERIA

A. Types of Changes and Modifications

Changes to the CDBG-DR program may take several forms, including substantial amendments to the Action Plan, non-substantial amendments, project-level changes, and waivers of regulatory requirements. Each type of change carries specific requirements that must be followed to maintain compliance with HUD’s expectations and federal law. Together, these classifications ensure that all modifications to CDBG-DR-funded



programs and projects are managed transparently and in full compliance with federal expectations, while allowing for reasonable flexibility to adjust to changing circumstances and lessons learned during implementation.

1. Substantial Amendments

According to the applicable Federal Register notices and the DHSEM Action Plan, a substantial amendment is required when the grantee proposes to:

- A change in program benefit or eligibility criteria.
- An addition or deletion of an activity.
- A proposed reduction in the overall benefit requirement.
- An allocation or reallocation of 10% or more of the CDBG-DR allocation.
- An update to the submitted initial Action Plan if the original submission was incomplete.

In such cases, the grantee must publish the proposed amendment on its official CDBG-DR website for public comment for no fewer than thirty calendar days. Following the comment period, the grantee must summarize the comments received and submit the amendment and summary to HUD for formal review and approval. The amendment may not take effect until HUD has issued written acceptance. All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

2. Non-Substantial Modifications

A non-substantial amendment is an amendment to the plan that includes technical corrections, clarifications, and/or budget changes that do not meet the monetary threshold for substantial amendments to the plan and do not require posting for public comment. Non-substantial changes do not require public notice or HUD approval but must be documented internally by DHSEM and uploaded to the DRGR system at least five days before the change is effective. Subrecipients requesting such changes must submit a written justification to DHSEM that describes the nature and rationale for the modification. DHSEM will review the request to ensure compliance with program objectives and applicable law and will record the change in the internal amendment log maintained by the program office. All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

3. Project-Level Changes

Project-level changes refer to modifications to specific subrecipient or contractor projects, including scope changes, cost adjustments, and timeline extensions. If such changes materially alter the project's purpose, eligibility, or beneficiary impact, they may trigger the need for a substantial amendment or waiver request. Otherwise, they may be approved



administratively by DHSEM, subject to documentation and review. All project-level modifications must be submitted through DHSEM's formal change request process and must include justification, updated cost or schedule information, and verification that permits, licenses, or environmental requirements remain valid.

4. Corrective Modifications

Corrective modifications refer to changes imposed by HUD, DHSEM, or an auditor in response to identified risks, findings, or noncompliance. These may include reallocation of funds from non-performing projects, revisions to program policies, or restructuring of activities to ensure eligibility or effectiveness. Corrective actions are mandatory and must be executed as directed by the oversight entity, with prompt documentation and communication to all affected parties.

B. Waiver Requests and Approvals

The CDBG-DR program includes limited but critical authority to request waivers from federal program requirements, provided that such waivers are not inconsistent with statutory mandates and are granted by HUD. The authority to waive statutory or regulatory provisions lies exclusively with HUD, and only for requirements that are not mandated by statute. Provisions relating to fair housing, nondiscrimination, labor standards, and environmental protection are not subject to waiver under any circumstances, as stated explicitly in the Federal Register notices governing DR-4795 and DR-4843.

Two general types of waivers are recognized under this policy: regulatory waivers issued by HUD and administrative waivers issued at the state program level. Regardless of type, all waivers must be tracked, documented, and reviewed as part of program monitoring. DHSEM will maintain a centralized waiver log as part of its grants management system to ensure consistency, transparency, and audit readiness. No waiver, whether regulatory or administrative, may be implemented retroactively or without formal written approval from the appropriate authority.

1. Regulatory Waivers

Regulatory waivers involve formal written requests submitted to HUD by DHSEM and may only be requested when compliance with a specific regulation would prevent the effective implementation of disaster recovery objectives or cause undue hardship to affected communities.

When a regulatory waiver is sought, DHSEM must initiate a written waiver request that clearly identifies the provision to be waived, explains why the waiver is necessary, describes how program goals will still be met, and confirms that the waiver does not impact statutory requirements. Supporting documentation must include legal review,



evidence of alternative compliance where applicable, and, if required by HUD, a public notice and comment period. HUD’s review of waiver requests may take more than sixty days, and DHSEM may not proceed with implementing the requested waiver until HUD issues a formal written response. All waiver determinations must be retained in the official grant file and published for public transparency if they affect program delivery or benefit criteria.

2. Administrative Waivers

Administrative waivers refer to flexibility provided within state-managed processes—such as adjustments to internal deadlines, procedural documentation, or reporting intervals—and may be granted by DHSEM within the bounds of its role as the responsible entity for CDBG-DR implementation in New Mexico.

Administrative waiver requests may originate from subrecipients but must be submitted to DHSEM in writing and include sufficient justification, including documentation of necessity, impact, and alignment with programmatic intent. DHSEM will review each request for consistency with the Action Plan and for potential conflicts with HUD’s requirements. DHSEM retains the authority to deny administrative waiver requests if the request would result in noncompliance, reduced performance accountability, or inequitable distribution of program benefits. Approved administrative waivers must be documented and retained with the project file.

VII. ROLES AND RESPONSIBILITIES

Successful implementation of change, waiver, and modification protocols under the CDBG-DR programs for DR-4795 and DR-4843 depends on a clearly defined structure of roles and responsibilities at the state, local, and federal levels. These responsibilities must be carried out in accordance with HUD guidance, federal administrative law, and the approved New Mexico Action Plan.

Stakeholder	Roles & Responsibilities
New Mexico Department of Homeland Security and Emergency Management (DHSEM)	As the Grantee, DHSEM holds primary responsibility for administering all changes, processing waiver requests, and managing modifications at both the programmatic and project levels. DHSEM is responsible for determining whether a proposed change qualifies as substantial or non-substantial, coordinating public comment periods when required, submitting amendments and waiver requests to HUD, and ensuring that the implementation of any changes does not result in violations of statutory or regulatory requirements. DHSEM must ensure that all modifications are adequately documented in accordance with 2



	<p>CFR 200.334, which requires retention of all records related to the federal award for a minimum of three years from the date of final closeout, or longer if required by audit or legal proceedings.</p> <p>Modifications and requests for HUD waivers require approval by the DHSEM Director (or designee) and legal/compliance review prior to submission to HUD. Minor changes may be approved at the Program Director level, provided they are documented.</p>
Subrecipients	<p>Subrecipients—including municipalities, tribal governments, mutual domestic water consumers associations, and other eligible implementing partners—are responsible for identifying the need for project-level changes, preparing supporting documentation for internal modifications, and submitting any proposed changes to DHSEM in a timely and complete manner. Subrecipients must not implement any scope, schedule, budget, or eligibility change without written approval from DHSEM. In addition, subrecipients are required to notify DHSEM immediately upon discovering any issue that may necessitate a corrective modification, particularly in response to unforeseen events, procurement errors, or performance shortfalls.</p>
Contractors and Consultants	<p>Contractors and consultants supporting either DHSEM or subrecipient activities must operate strictly within the scope and terms of their original agreements and must not deviate from approved project plans unless a formal change order is approved. Contractors are expected to support the change management process by identifying technical or logistical obstacles that may require modification and providing detailed justifications and impact analyses when change requests are submitted.</p>
United States Department of Housing and Urban Development (HUD)	<p>The United States Department of Housing and Urban Development retains final oversight over all substantial amendments and any regulatory waivers. HUD may also direct corrective actions or enforce specific program changes based on monitoring findings, audits, or performance reviews. HUD’s Community Planning and Development field office will serve as the primary point of contact for reviewing and approving amendments or waiver requests submitted by DHSEM.</p>

Each entity engaged in the CDBG-DR program has a defined role that supports transparency, legal compliance, and continuity of program goals. All participants must



follow internal protocols and document their actions in accordance with this policy and applicable federal regulations.

VIII. COMPLIANCE & ENFORCEMENT

Monitoring of changes, waivers, and modifications under the CDBG-DR programs is a critical function to ensure legal compliance, program integrity, and accountability to both the public and HUD. DHSEM shall implement a structured compliance and monitoring protocol to oversee the application, execution, and documentation of all programmatic and project-level modifications undertaken pursuant to this policy.

A. Subrecipient Monitoring

DHSEM is responsible for conducting regular reviews of all subrecipient activity to ensure that changes to scope, timeline, or budget have been authorized in writing and that any waiver or amendment processes were carried out in accordance with federal guidance. Monitoring will include both desk reviews and field verification, depending on the complexity and risk level of the change. DHSEM's internal monitoring team shall verify the presence of documentation such as approved change requests, waiver determinations, public comment records, updated project budgets, and compliance certifications.

Monitoring checklists shall align with the requirements of 2 CFR 200.329, which outlines the federal government's expectation that recipients and subrecipients track performance and report deviations from planned activities.

B. Implementation Tracking

In addition to regular program monitoring, DHSEM shall review the change control and waiver tracking systems quarterly to verify that all entries are current, complete, and supported by source documentation. Any discrepancies or undocumented modifications will be subject to a formal compliance review. Subrecipients who implement changes or waivers without written approval from DHSEM may be subject to enforcement actions, including the withholding of reimbursements, demand for repayment of disallowed costs, or suspension from future program participation.

DHSEM will also ensure that any regulatory or administrative waivers issued are monitored for proper implementation and expiration. This includes tracking the duration and terms of the waiver and confirming that all conditions set forth by HUD or DHSEM have been satisfied. Waivers shall be included in the scope of external audits and performance evaluations conducted by HUD or other oversight bodies.



C. Non-Compliance

In the event of noncompliance, DHSEM shall follow the corrective action procedures outlined in 2 CFR 200.339. This may include issuing written notices of deficiency, requiring corrective action plans, or recommending to HUD that a subrecipient be deemed ineligible for further federal assistance. DHSEM may also refer cases to HUD's Office of Inspector General when it determines that fraud, waste, or abuse may have occurred in relation to unauthorized or improperly executed program changes.

IX. CONFLICTS OF INTEREST AND MODIFICATIONS

To maintain the highest standards of integrity, all stakeholders, including DHSEM staff, subrecipients, contractors, and partners, must adhere to strict conflict of interest guidelines. Individuals involved in the decision-making or procurement processes must disclose any personal or financial interests that might influence their objectivity in fulfilling fair housing objectives. This requirement is crucial to ensuring that all actions taken under the Changes, Waivers, and Modifications Policy are impartial and align with the principles of fairness and equity. Regular training will reinforce these standards and help identify and address potential conflicts proactively.

The Changes, Waivers, and Modifications Policy is subject to continuous evaluation and refinement to adapt to changing legal requirements and community needs. Annual reviews, based on comprehensive feedback from stakeholders and affected communities, facilitate necessary modifications to enhance policy effectiveness. Modifications are implemented in a structured manner, ensuring alignment with both federal mandates and local objectives. All changes are documented, disseminated across all levels of involvement, and incorporated into subsequent training sessions, preserving the policy's integrity and responsiveness to emerging challenges.

X. DOCUMENTATION & RECORDKEEPING

Transparency in the administration of the CDBG-DR program is not only a guiding principle, but a legal obligation required by HUD and by federal law. All changes, waivers, and modifications—whether substantial or administrative—must be thoroughly documented and made available for review by HUD, auditors, subrecipients, stakeholders, and the public when appropriate.

This section outlines the documentation and disclosure requirements that DHSEM and all program partners must follow. Transparency and documentation are essential to maintaining trust in the program, ensuring equitable delivery of disaster recovery services, and protecting the integrity of the CDBG-DR funding provided to the State of New Mexico. All stakeholders involved in changes, waivers, or modifications are responsible for complying fully with these requirements.



A. Record Retention

All documentation related to changes, waivers, and modifications must be maintained in accordance with 24 CFR 570.506, 24 CFR 570.490, and 2 CFR 200.334 (as amended by any waivers or alternative requirements), which requires the retention of records that fully detail the history of each federal award. This includes records of the rationale for each change, written approvals, communications with HUD, public comments where applicable, and implementation results.

DHSEM must establish and maintain a centralized change control register or amendment log that contains a unique identifier for each modification, the type of change, the initiating party, the approval path, and final resolution.

B. Transparency Protocols

To ensure accessibility and public accountability, DHSEM will post all substantial amendments and HUD-approved waivers to the New Mexico CDBG-DR Action Plan website (www.dhsem.nm.gov/cdbg-dr2025). This public-facing platform will also include a summary of the current program structure, major updates, and status reports. Where practical, change tracking logs and summaries of approved administrative waivers may also be posted, provided that doing so does not compromise security or personally identifiable information.

1. Substantial Amendments

Substantial amendments to the Action Plan must follow HUD's transparency protocols as outlined in the Action Plan. These notices require that all substantial amendments be posted on the official CDBG-DR website maintained by DHSEM for no fewer than thirty calendar days to solicit public comment. Written comments can be submitted through the following:

- Email at publiccomments@dhsem.nm.gov ;
- Website at www.dhsem.nm.gov in the Public Comment box; or
- Letter at CDBG-DR, c/o The UPS Store, 115 E. College Boulevard #373, Roswell, NM 88201.

Oral comments can be submitted through the following:

- Provide verbal comments to a Disaster Case Manager;
- Call the Disaster Case Management Mainline at 505-670-4662;
- Attend any state-sponsored recovery event and speak with a DHSEM team member; or
- Attend CDBG-DR Public Hearings.



DHSEM must summarize and respond to all comments received and submit both the amendment and the comment summary to HUD for final approval. No substantial amendment may take effect until HUD provides written acceptance of the change.

2. Non-Substantial Amendments and Administrative Changes

For internal or administrative changes, public notice is not required, but documentation must still be maintained in a centralized project file and within DHSEM's grants management system. Changes must be accessible for review by state auditors, HUD monitors, or federal investigators, and must reflect the internal review and approval process used to validate the decision.

XI. REFERENCES

The authority for making changes, requesting waivers, and approving modifications in the CDBG-DR program is based on the following federal and state requirements:

Executive Order, Federal and State Laws and Regulations	Description
Disaster Relief Appropriations Act / Title I of the Housing and Community Development Act of 1974	Authorizes HUD to oversee CDBG compliance and approve modifications consistent with program objectives (Section 104(e)).
87 FR 6364 (Feb. 3, 2022 – DR-4795), 87 FR 31636 (May 24, 2022 – DR-4843), and FR-6428-N-01	Grant HUD authority to waive regulatory requirements (except fair housing, nondiscrimination, labor standards, and environment). Require substantial amendments to be posted for 30 days, submitted to HUD, and approved before taking effect.
24 CFR Part 570	Governs CDBG program administration. Even with HUD waivers, grantees must follow requirements on amendments, citizen participation, and reporting.
2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards	Requires documentation of all program modifications.



XII. APPENDICES

This policy is further supported by a series of internal appendices and tools that facilitate implementation, including a standardized Change Request Form, a Waiver Justification Template, a public notice template for substantial amendments, a change control register, and a contact list for DHSEM staff designated to review, approve, and track changes and waivers. These tools do not replace regulatory requirements but serve as administrative aids to ensure consistency and completeness across program records.