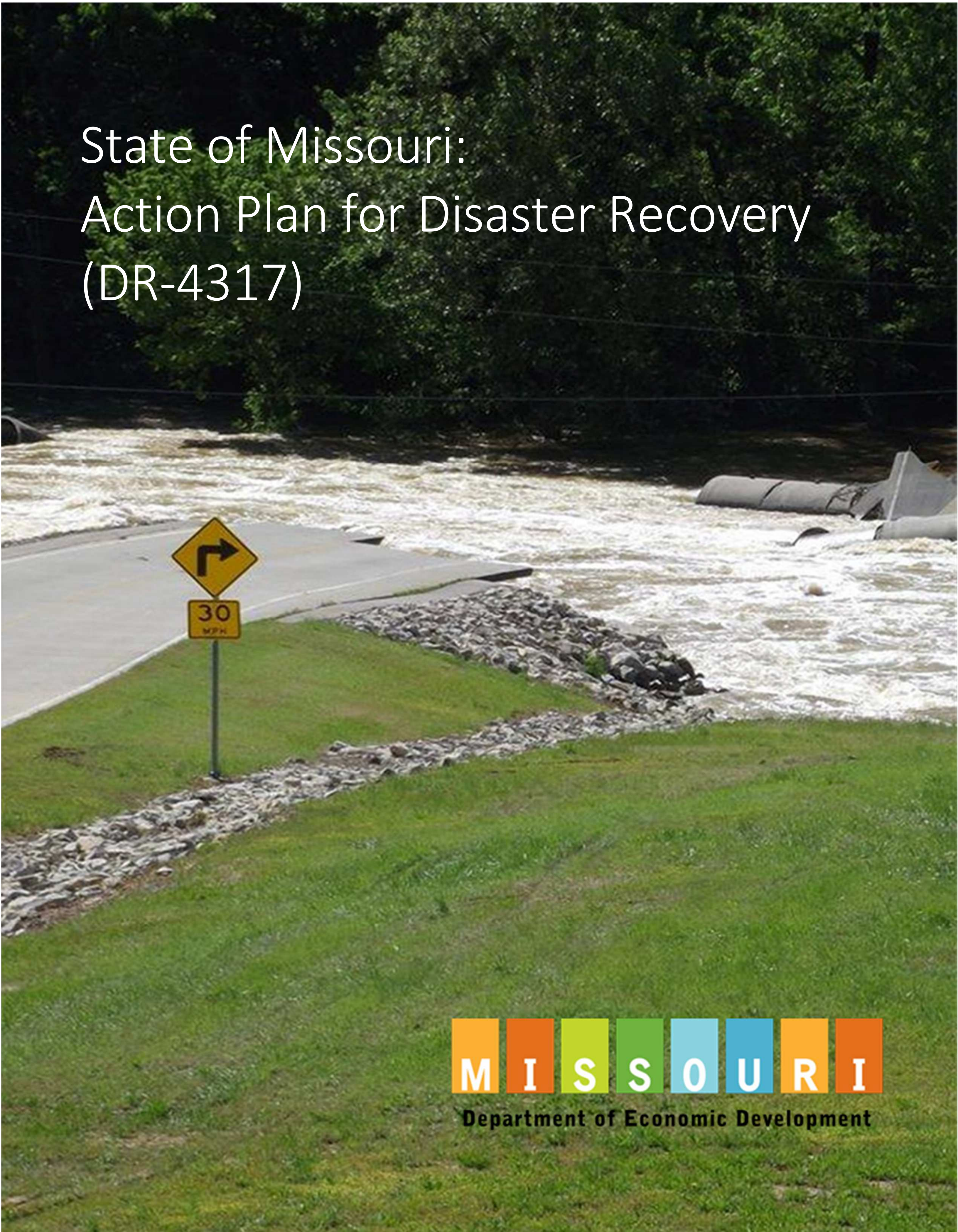
State of Missouri: Action Plan for Disaster Recovery (DR-4317)



MISSOURI
Department of Economic Development

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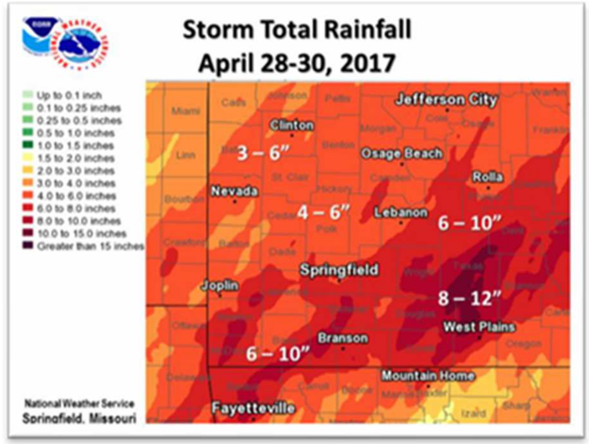
Executive Summary

Between April 28 and May 11, 2017, the state of Missouri was struck by severe storms, tornadoes, straight- line winds, and flooding. During the weekend of April 29-30, a strong storm system brought multiple rounds of thunderstorms and heavy rain to the southern two-thirds of Missouri.

Rainfall totals surpassed nine inches in some locations causing flash flooding and historic flooding along some of the tributaries of the Missouri and Mississippi Rivers. A few thunderstorms also became severe during the afternoon of April 29 with two documented tornadoes. April 2017 became the second wettest April on record in Missouri over the past 123 years largely because of this event



Photograph 2 – From National Weather Service

USGS Stream Gauge Name	Peak Stage	Flood Stage	Historic Peak
Moniteau Creek near Fayette	19.71	16	
Hinkson Creek at Columbia	19.21	15	
Moreau River near Jefferson City	33.57	17	
Cedar Creek near Pleasant View	24.81	20	
Sac River near Caplinger Mills	28.39	16	
Maries River at Westphalia	21.00	10	
Gasconade River near Hazelgreen	39.74	21	
Big Piney River near Big Piney	30.67	8.5	Yes
Gasconade River at Jerome	35.06	15	Yes
Gasconade River near Rich Fountain	37.46	20	Yes
Meramec River near Steelville	28.71	12	Yes
Meramec River at Eureka	30.01	16	Yes
St. Francis River at Mill Creek	27.32	16	
St. Francis River near Saco	33.42	21	
St. Francis River near Patterson	37.13	16	Yes
James River near Springfield	20.90	12	
Wilson Creek near Springfield	9.15	7	
Bryant Creek near Tecumseh	41.82	20	Yes
Black River near Annapolis	23.3	8	
Black River at Poplar Bluff	21.96	16	
Jacks Fork at Eminence	27.72	12	Yes
Current River at Van Buren	37.42	20	Yes
Current River at Doniphan	33.13	13	Yes
Spring River at Carthage	18.44	10	
Spring River near Waco	28.14	19	
Shoal Creek above Joplin	22.96	14	
Elk River near Tiff City	27.39	15	

A report from the US Department of the Interior listed 27 monitored rivers and creeks that reached flood stage. Ten of those reached an historic peak. Two rivers peak record (Jacks Ford, Current River) had stood since 1904. The peak stage of the Current River at Van Buren exceeded the previous maximum stage by 8.4 ft.

By Saturday evening of that weekend, flash flooding and flooding had already led to 93 evacuations and 33 rescues conducted by local and state responders. Five deaths were reported in Missouri. After the storming and flooding ended, a

total of 55 counties were declared Federal disaster areas. More than 1,200 homes were initially assessed as damaged or destroyed. Final FEMA counts would add another 700-plus homes. In addition, there were initial estimated damages of $58 million to roads, bridges and other public infrastructure. This assessment would double in size to more than $113M when final FEMA Project Worksheets were tallied.

This series of storms was preceded just 17 short months earlier by an almost identical severe storm, straight-line winds and flooding event. In early January of 2016, 42 counties in the southern part of the state were declared a disaster area by FEMA. Many of the same households and businesses just recovering from the flooding event were hit again by record storms. After this record flooding event, 55 counties were presidentially declared a disaster area. FEMA deployed its host of tools in the Individual Assistance and Public Assistance Programs.

As with all disasters, the assessment of damage is done multiple times by different organizations and for different purposes. This document tries to reflect those counts as time progressed to show the need and impact resulting from the flooding. To the reader, the numbers may not flow perfectly, or even match, but that may be the result of a time period or a program threshold. Most importantly, is the number of people who reached out for help. The Missouri CDBG Program used those numbers as the basis of unmet need calculations while attempting to verify it with current survey information.

In the months after the storm, and as a result of the $58,535,000 allocation of Supplemental Disaster CDBG funding, the Missouri CDBG Program, in conjunction with its partner agencies the Regional Planning Commissions and Community Action Agencies, assessed the remaining unmet need in the affected counties. Unmet need was discovered in the areas of housing, public infrastructure and economic revitalization. The allocation was appropriated under HUD's Federal Register Notice published on Tuesday, August 14, 2018 at 83 FR 40314; and the Federal Register Notice published on Friday, February 9, 2018, at 83 FR 5844 (prior notice) that describe the allocation's applicable waivers and alternative requirements. The CDBG-DR funds are available to address unmet needs related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most impacted and distressed" areas (identified by HUD using the best available data) resulting from a major declared disaster that occurred in 2017. All CDBG-DR funded activities must clearly address an impact of the disaster for which funding was allocated. This means each activity must:

1. Be a CDBG eligible activity (or be eligible under a waiver of alternative requirement in applicable Federal Register Notices;
2. Meet a National Objective, and
3. Address a direct or indirect impact from the major disaster in a Presidentially-declared county.

Both Federal Register Notices require that the State primarily consider and address its unmet housing recovery needs. After the State demonstrates through need assessments that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other sources of funds, the remainder of the allocation may address unmet economic revitalization and infrastructure needs that are unrelated to unmet housing needs.

The overall benefit requirement for the CDBG-DR funds follows the statute requirement under the HCD Act (42 U.S.C. 5301(c) for the CDBG program. The statute requires that not less than 70 percent of the aggregate of CDBG program funds be used to support activities benefitting low-and moderate income persons. Under HUD's Federal Register Notice published February 9, 2018, the 70 percent overall benefit requirement shall remain in effect for this allocation. Further requirements under Federal Register Notice 83 FR 40314, include that at least 80 percent of the allocation, no less than $46,828,000, must address unmet disaster needs, specifically addressing unmet housing needs as priority, within the HUD-identified most impacted and distressed areas, identified by zip codes: 63935, 63965, 64850, 65616, and 65775.

This Action Plan outlines the use of those CDBG-DR funds in a manner that directly addresses the unmet need. The focus initially is on housing, as required in the Federal Register that describe the allocation's applicable waivers and alternative requirements. The Plan specifies a number of funding categories that affected communities can access to assist them with their specific needs. Because the State found more unmet need than the initial allocation of funds, the State will prioritize

project applications (and ensure access by "most impacted") by adding points based upon a score which is aggregated from two factors: the relative damage to housing in the County as compared to the total housing in the County and the severity of the County's SoVI® index number.

The CDBG Disaster Recovery Program will accept applications using an "open cycle" format allowing cities and counties to apply under any of the categories established. The expenditure of funds rate will be analyzed to ensure a timely use of funds. If the "open cycle" methodology is not producing applications and activities at a pace consistent with the planned expenditure rate, the State reserves the right to establish category deadlines with the intention of increasing the expenditure pace. Any change in access to applications for assistance will be announced publicly. Maximum application amounts, if applicable, and maximum beneficiary amounts, if applicable are spelled out in the Plan at the point that the unmet housing need is exhausted, the CDBG Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of infrastructure and economic revitalization. This current Plan provides the unmet needs information for both of those categories and the amended Plan will provide an update as well as a method of distribution that reflects areas most impacted. The amendment will provide detail on categories of funding available, deadline dates, as applicable, and any maximums per applicant or beneficiary.

PROGRAM BUDGET SUMMARY			
Category	**Program**	**Allocation**	**%**
Administration		**$2,926,750**	**5%**
Planning		**$1,500,000**	**2.5%**
Public Service	**Vulnerable Population Unmet Needs**	**$1,525,000**	**2.5%**
Housing	**Voluntary Local Buyout and Acquisition Program**	**$52,583,250**	**90 %**
	Homeownership and Renter/Tenant Assistance Program		
	Affordable Multi-Family Rental Recovery		
	New Construction Single Family		
	Vulnerable Population Unmet Needs		
Total Funds Allocated		**$58,535,000**	**100%**

Section One - Introduction

Photograph 3 – Flooding in Carter County (courtesy of Community Foundation of the Ozarks)

Appropriations Act

In HUD's Federal Register notice published on February 9, 2018 $7.4 billion in CDBG– DR funds was appropriated by the Supplemental Appropriations for Disaster Relief Requirements Act, 2017, which allocated funds to Texas, Florida, Puerto Rico, and the U.S. Virgin Islands in response to qualifying disasters in 2017. In that notice, HUD described those allocations, applicable waivers and alternative requirements, relevant statutory and regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities.

On April 10, 2018, HUD allocated nearly $28 billion in Community Development Block Grant disaster recovery (CDBG–DR) funds appropriated by the Further Additional Supplemental Appropriations for Disaster Relief Requirements Act, 2018. Of the $28 billion, HUD allocated $10.03 billion to assist in addressing unmet needs from disasters that occurred in 2017; $2 billion for improved electrical power systems in areas impacted by Hurricane Maria; and $15.9 billion for mitigation activities.

On August 14, 2018 HUD released notice detailing the $10.03 billion allocation for addressing unmet recovery needs that supplemented the February 9, 2018 release.

These funds are to be used to satisfy a portion of unmet need that remains after other federal assistance, such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), and/or private insurance, has been allocated.

The Department of Housing and Urban Development (HUD) uses the "best available" data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure, and housing and economic revitalization. Because limited funds are available and estimated unmet needs greatly exceed available funds, pursuant to the Disaster Relief Appropriations Acts, HUD identified the most impacted and distressed areas based on the "best available data" for the eligible affected areas. Based on this assessment, HUD notified the State of Missouri that it will receive an allocation of $58,535,000 in disaster recovery funds to assist in recovery from the floods of 2017.

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within six years of the signed agreement between HUD and the grantee unless an extension is granted by HUD. To ensure that the funds assist the most impacted areas, at least 80 percent $46,828,000, of the combined total awarded to the state will go to the most impacted and distressed areas, identified as the following zip codes: 63935,63965,64850,65616, and 65775. All the allocated funds must be used for eligible disaster-related activities. Eligible disaster-related activities are authorized under Title I of the Housing and Community Act of 1974 and related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization resulting from an eligible disaster. As stated prior in this action plan, not less than 70% of CDBG-DR funds must be used for activities benefitting low-and moderate-income persons. Both Federal Register Notices, 83 FR 5844 and 83 FR 40314, require that the State primarily consider and address its unmet housing recovery needs. After the State demonstrates through need assessments that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other sources of funds, the remainder of the allocation may address unmet economic revitalization and infrastructure needs that are unrelated to unmet housing needs. Effective controls must be in place and monitored for compliance to ensure that fraud, waste, and misuse of funds does not occur.

The Missouri Department of Economic Development (MO-DED) has been designated by Governor Mike Parson as the responsible entity for administering the CDBG-DR funds allocated to the state.

Missouri submits this Action Plan to outline its unmet needs and establish how the state will allocate its funds through its programs. This includes the proposed use of funds, criteria for eligibility, and how funds will address long-term recovery in the most impacted and distressed areas. The Unmet Needs Assessment, which evaluates the three core aspects of recovery – housing, infrastructure, and economic development-- forms the basis for the decisions outlined in the Method of Distribution. This Action Plan was developed with the help of many state and local stakeholders as well as the public to target the unmet need that can be addressed by these limited federal funds.

Summary of Impact and Presidentially Declared Counties

On May 24, 2017, Governor Eric R. Greitens requested a major disaster declaration due to severe storms, tornadoes, straight-line winds, and flooding during the period of April 28 to May 11, 2017. The Governor requested a declaration for Individual Assistance for 37 counties, Public Assistance for 46 counties, and Hazard Mitigation statewide. During the period of May 10-23, 2017, joint federal, state, and local government Preliminary Damage Assessments (PDAs) were conducted in the requested counties and are summarized below.

Individual Impacts

- Total Number of Residences Impacted – 1,923
    - Destroyed 396
    - Major Damage 848
    - Minor Damage 477
    - Affected 202
- Percentage of Insured Residences 19.6%
- Percentage of Low-Income Households 49.2%
- Percentage of Elderly Households 15.7%
- Total Individual Assistance Cost Estimate $28,583,646

Public Infrastructure Impacts

The primary impact was damage to roads and bridges

- Statewide per capita impact $9.55
- Statewide per capita impact indicator $1.43
- Total Public Assistance cost estimate $57,198,629

Business Impacts

The Small Business Administration (SBA) conducted a survey of the 37 counties included in the Governor's request for Individual Assistance during the period May 10 through May 18.

- Businesses Impacted
    - 283 with major damage estimated at $38,100,000
    - 353 with minor damage estimated at $12,600,000
- Non-Profit Organizations
- 13 with major damage estimated at $ 1,400,000
- 11 with minor damage estimated at $ 197,000

In total, the SBA damage assessments indicated 1279 structures (homes and businesses) with major damage. Of those 37 counties, 27 counties were declared eligible for disaster loans. SBA declared access to economic injury-only loans to 27 more contiguous counties.

Declaration

On June 2, 2017, a Presidential Declaration of a Major Disaster was announced for a total of 55 counties in response to the historic flooding that caused destruction of homes, businesses, roads, bridges, other public infrastructure, as well as, damage and interruption of non-profit service providers. FEMA *declared* 33 counties for both Public Assistance and Individual Assistance, 20 counties for Public Assistance only, and 2 counties for Individual Assistance only.

Counties Eligible for Assistance

The following counties in the State of Missouri have been designated adversely affected by the disaster and are eligible for assistance:

County	Public Assistance	Individual Assistance
Barry	√	
Barton	√	
Bollinger	√	√
Boone	√	
Butler	√	√
Camden	√	
Cape Girardeau	√	
Carter	√	√
Cedar	√	
Christian	√	√
Cole	√	
Crawford	√	√
Dade	√	
Dallas	√	
Dent	√	√
Douglas	√	√
Dunklin	√	√
Franklin	√	√
Gasconade	√	√
Greene		√
Howell	√	√
Iron	√	√
Jasper		√
Jefferson	√	√
Lawrence	√	
Madison	√	√
Maries	√	√
McDonald	√	√

County	Public Assistance	Individual Assistance
Miller	√	
Mississippi	√	
Morgan	√	
New Madrid	√	
Newton	√	√
Oregon	√	√
Osage	√	√
Ozark	√	√
Pemiscot	√	√
Perry	√	
Phelps	√	√
Pike	√	
Pulaski	√	√
Ralls	√	
Reynolds	√	√
Ripley	√	√
Scott	√	
Shannon	√	√
St. Louis	√	√
Ste Genevieve	√	√
Stone	√	√
Taney	√	√
Texas	√	√
Washington	√	
Wayne	√	√
Webster	√	
Wright	√	√

FEMA Eligibility Map – 7/13/2018

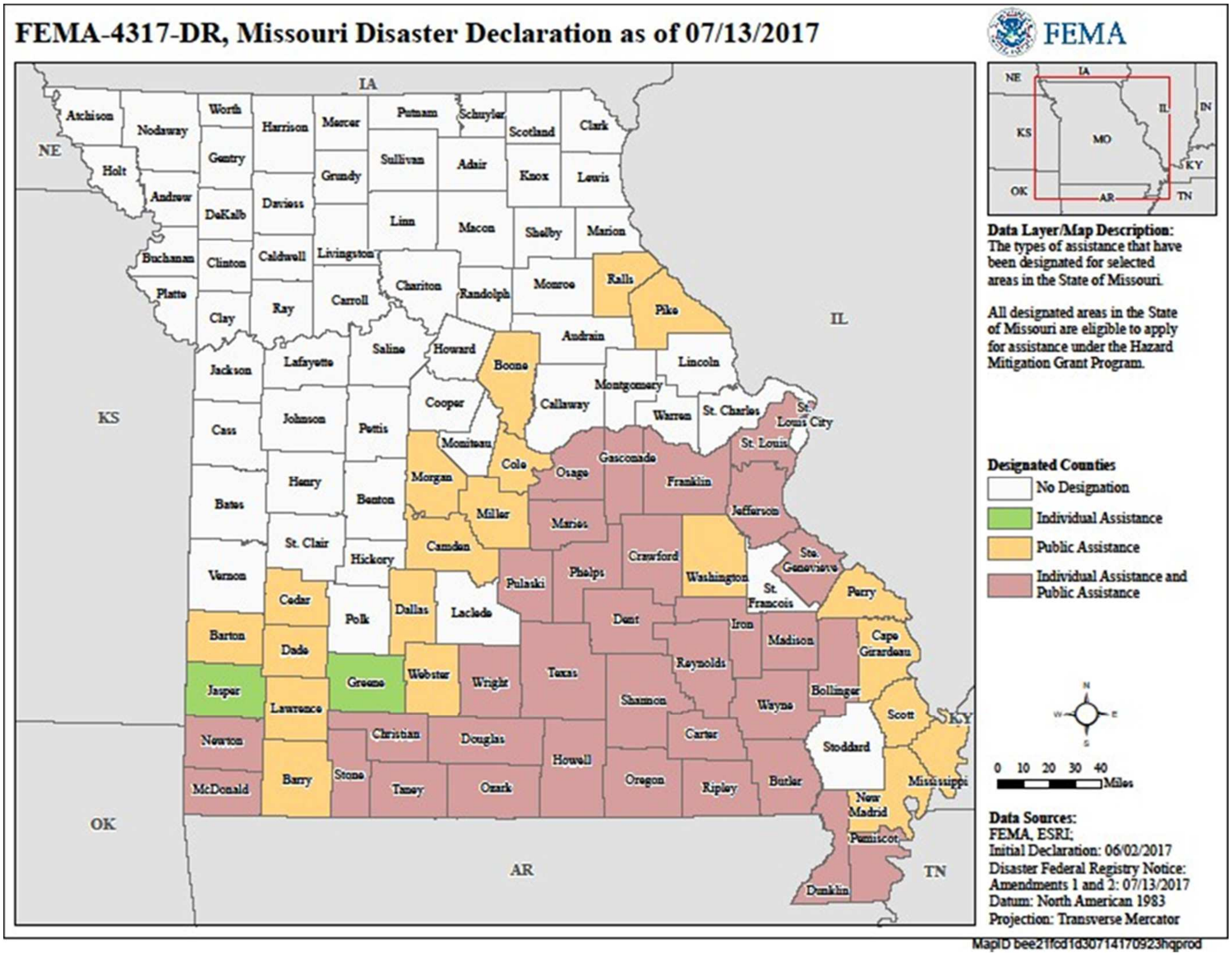


Figure 1 – Map from FEMA.GOV

Section Two – Missouri Disaster Recovery

Photograph 4 – Doniphan County Flooding (Courtesy of Community Foundation of the Ozarks)

Missouri Disaster Recovery Framework

Introduction

The Missouri Disaster Recovery Framework (MDRF) is a collaborative effort introduced by the State of Missouri to enhance the long-term recovery capabilities of communities. Its purpose is to more quickly restore basic services to individuals and families, enable timely return to functionality, and reestablish social and economic order following a disaster.

Missouri has traditionally had a strong emergency response network. The development and implementation of a framework that focuses on the recovery portion of the disaster continuum will accomplish an efficient and well-rounded approach to the state's disaster recovery efforts. Missouri is finalizing the state's first MDRF Plan to codify both the statewide approach to long term recovery and also provide the detail for each of the Recovery Support Functions (RSF).

Purpose

Recovery is the process of returning a community to a normal state, albeit a "new normal", after a disastrous incident. Recovery planning is paramount because no community is immune to disaster. A well-organized and collaborative approach will allow a faster recovery that leaves impacted communities more resilient.

Emergency response is undoubtedly best achieved under a command and control structure, but recovery is best achieved through building consensus. It requires local dialogue, input, collaboration and participation from all sectors of the community.

Photograph 5 – Photograph from State of Missouri Website

The MDRF provides an organizational structure for addressing both the pre- and post-disaster recovery concerns for all hazard types. It is patterned after the National Disaster Recovery Framework (NDRF) that "establishes a common platform and forum for how the whole community builds, sustains, and coordinates delivery of recovery capabilities. Resilient and sustainable recovery encompasses more than the restoration of a community's physical structures to pre- disaster conditions. Through effective coordination of partners and resources, we can ensure the continuity of services and support to meet the needs of affected community members who have experienced the hardships of financial, emotional, and/or physical impacts of devastating disasters."

Pre-disaster planning greatly improves a community's ability to successfully recover from a disaster. By identifying available resources, roles, and responsibilities, state and local officials will have the knowledge to better leverage assistance and coordinate with RSF partners to maximize availability and use of those resources.

A whole community approach requires state and local governments; volunteer, faith- and community-based organizations; other non-governmental organizations; the private sector; and the public to work together. This teamwork enables communities to develop collective, mutually supporting local capabilities to withstand the potential initial impacts of these incidents, respond quickly, and recover in a way that sustains or improves the community's overall well-being.

The long-term recovery effort considers community and regional recovery for public and private sector partners. It uses existing resources of the state; local, professional, technical, and financial programs to facilitate faster and more resilient recovery. The structure allows creative uses of existing programs. It also uses partnerships to form and solve problems. Stakeholder input is critical at every level.

The MDRF specifies emergency operations necessary to coordinate disaster relief efforts for rapid return to pre-emergency conditions. It defines the state and local government roles and procedures for implementing supplemental federal disaster assistance available under PL 93-288, the Robert T. Stafford Disaster Relief Act of 1988, as amended by PL 100-707. Providing services to people with disabilities and others with access and functional needs is implicit throughout the MDRF.

Authority

Missouri activated a new RSF model to address the state's long-term recovery needs following the devastating effects of flooding which began on April 28, 2017. The Governor's Office appointed a disaster recovery coordinator, for the first time in Missouri's history, prior to declaration of a federal disaster.
The Governor's Office designated specific agencies/offices to lead RSFs aligned with their core capabilities and expertise in conjunction with the State Emergency Management Agency (SEMA):

- Natural and Cultural Resources - Missouri Department of Natural Resources
- Community - Missouri Department of Economic Development
- Infrastructure - Missouri Department of Transportation
- Health and Social Services - Missouri Department of Health and Senior Services
- Housing - Missouri State Treasurer's Office and Missouri Housing Development Commission
- Economic - Missouri Department of Economic Development

Phases of Recovery and Resilience

Response operations will be put in motion first and have priority. Efforts will transition to recovery once areas are secure enough to begin an initial disaster assessment. Recovery is a continuum that moves from short-term to intermediate to long-term recovery with an appropriate set of activities and actions for each phase.

The MDRF focuses on community-wide resilience. Some examples of resilience-building activities that Missouri has already undertaken include:

- Residential and commercial buyouts
- NFIP participation
- Protective levees and berms
- Relocation of critical infrastructure
- Resilient design of roads and bridges

Missouri State Recovery Support Functions

The RSF approach is derived from the best practices codified in FEMA NDRF. RSF architecture is the coordination and management structure, by key functional areas of assistance, to deliver resources and capabilities, regardless of size or scope following an incident. Each individual RSF groups capabilities to achieve comprehensive, sustainable, and resilient recovery in essential mission areas.

Each RSF has a federal and state primary agency that serves as the lead coordinator and point of contact. The support organizations in each RSF are divided into one of three tiers to better represent the amount of time and expertise a supporting entity would bring to their respective RSF.

- The state RSF leaders aggressively pursue developing and cataloging capabilities and resources to fill gaps and meet objectives applicable to their area.
- Tier I organizations have a critical role in advising, subject matter expertise and leadership in their respective RSF.
- Tier I organizations have dedicated staff assigned to the recovery effort (full or part-time).

- A Tier II organization may have advisory or subject matter expertise but is not required for daily operations of the RSF.
- The Tier III organizations are stakeholders in the outcomes. Decisions made by the RSF should consider Tier III interests in order to contribute to the overall success of the mission.

Governor’s Faith-Based and Community Service Partnership with Disaster Recovery

The mission of the Governor's Faith-Based and Community Service Partnership for Disaster Recovery (The Partnership) is to aid Missourians' recovery plans through a holistic approach to disaster recovery that maximizes public and private resources for an efficient and effective integrated system that addresses human services, housing, infrastructure, community and economic development issues.

The Partnership was created by an executive order issued by Gov. Mel Carnahan after the Great Flood of 1993 to improve the coordination of response to the overwhelming human needs caused by that event. The Partnership was reaffirmed by Executive Order 09-25 in September 2009.

Duties and Responsibilities

As charged in the executive order, The Partnership’s duties and responsibilities are to:

- Develop and maintain operating protocols for The Partnership
- Serve as the coordinating organization in concert with the State Emergency Management Agency (SEMA) for emergency human services functions in natural disasters and terrorist events
- Provide a forum to enable collaborative organizations such as the Missouri Voluntary Organizations Active in Disaster (MOVOAD) and Missouri Interfaith Disaster Response Organization (MIDRO) to best serve Missourians in time of emergency
- Assure the responsiveness of public and private sector resources to citizens in time of disaster
- Improve the human services disaster response and recovery delivery methods with a goal of increasing service to the citizens of Missouri while maximizing the use of public and private sector resource
- Develop and maintain an effective response and recovery plan which includes those Missourians with special needs
- Function as a State Citizen Council for the State of Missouri, with support to the Homeland Security Advisory Council, on post-disaster human service issues
- Develop and propose to the Governor's office, viable plans for funding recovery efforts in disasters that are undeclared, and to assist Missourians who are underserved in declared disasters

Members of the Partnership

The Partnership is comprised of governmental and private agency representatives.

Government members represent the state departments of:

Agriculture; Conservation; Economic Development; Elementary and Secondary Education; Health and Senior Services; Higher Education; Insurance, Financial Institutions and Professional Registration; Labor and Industrial Relations; Mental Health; Natural Resources; Office of Administration; Public Safety; Social Services; State Emergency Management Agency and University of Missouri – Extension Additional members represent the Missouri Housing Development Commission, Missouri Community Service Commission, United States Department of Agriculture, Missouri National Guard, and FEMA Region VII.

Private agency members represent:

American Red Cross, AmeriCorps - St. Louis, Church World Service, Convoy of Hope, Lutheran Disaster Services- Lutheran Family and Children's Services, Missouri American Federation of Labor - Congress of Industrial Organizations, Missouri Association of Community Action, Missouri Association for Social Welfare, Missouri Baptist Convention, Missouri Catholic Conference, Missouri Emergency Preparedness Association, Missouri Interfaith Disaster Response Organization, Missouri Legal Services, Missouri Police Chiefs Association, Missouri Sheriffs Association, Missouri United Methodist Conference, Missouri Voluntary Organizations Active in Disaster, The Salvation Army and United Way of Missouri.

Section Three- Overall Storm Impact

Photograph 6 – Doniphan County Flooding (Courtesy of Community Foundation of the Ozarks)

Pre-Disaster Conditions

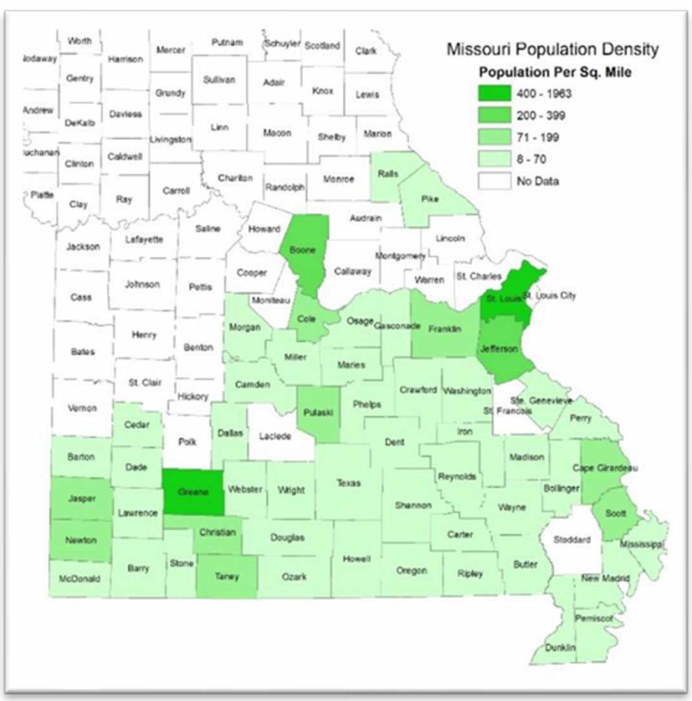
The declared counties cross the entire southern half of the state of Missouri. Damage begins at the western border and swells in size all the way to the Mississippi River, on the state's eastern edge. The geography of the impacted counties is diverse. The western edge of the disaster area sits in the Osage Plains. The Plains quickly gives way to the Ozark Plateau. The Ozark Plateau dominates the landscape with heavily- forested hills and low mountains. The southeastern portion of Missouri is home to flat fields of fertile agriculture. Interstate Highway 44 crosses much of this same path as a strong transportation corridor.

Figure 2 – From graphicsmaps.com

Southern Missouri is an area rich with water and is the home of several spring-fed large rivers such as the Current and Jack's Fork River that make up the Ozark National Scenic Riverways, the first national park area to protect a wild river system. Major lakes (many created by river dams) include Table Rock Lake, Lake Taneycomo, Clearwater Lake and Bull Shoals Lake.

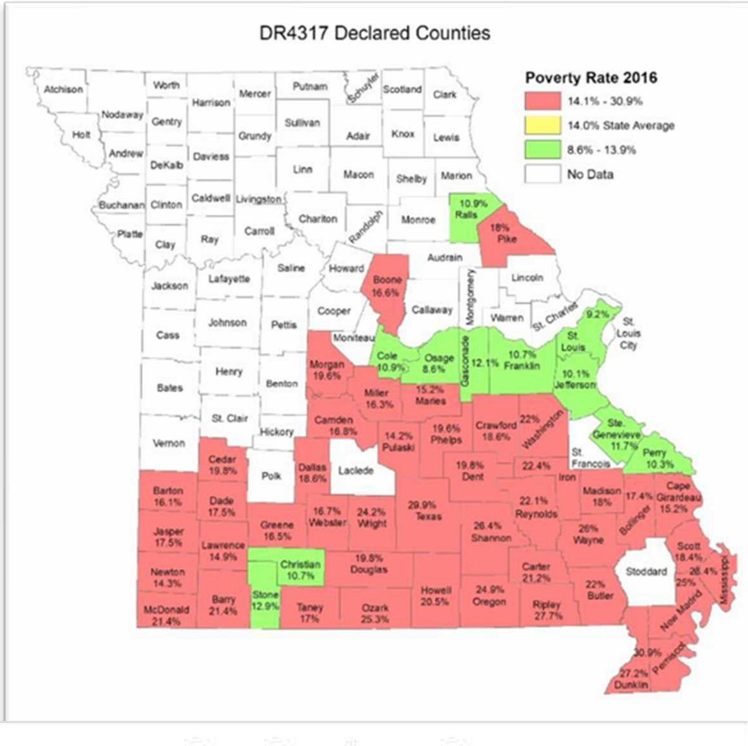
While the many rivers, lakes and streams enhance the beauty of the region, too much water has become one of the more frequent natural hazards faced by area residents. Both headwater flash flooding and backwater flooding from swollen rivers have taken their toll. Presidential declarations in 2008, 2009, 2011, 2013, and 2015-16 have affected many of the declared counties prior to the 2017 flooding.

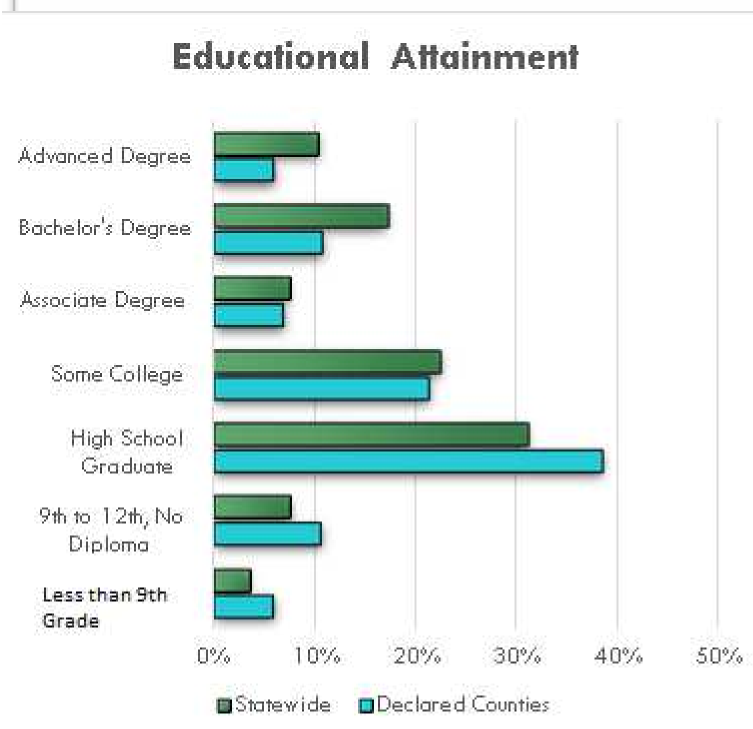
People



Population Density

52% of Missouri's residents live in the declared counties. Geographically, those counties make up 50% of the state's area. The average population per square mile of the declared counties is 98, however, the median population per square mile is just 35 persons compared to 87 persons per square mile in the state. Only four counties have more than 400 persons per square mile. St. Louis County has almost 2,000 residents per square mile. This disparity is one of the factors that makes it essential that the program design be customized by area to meet the varied needs of each region





Income Levels

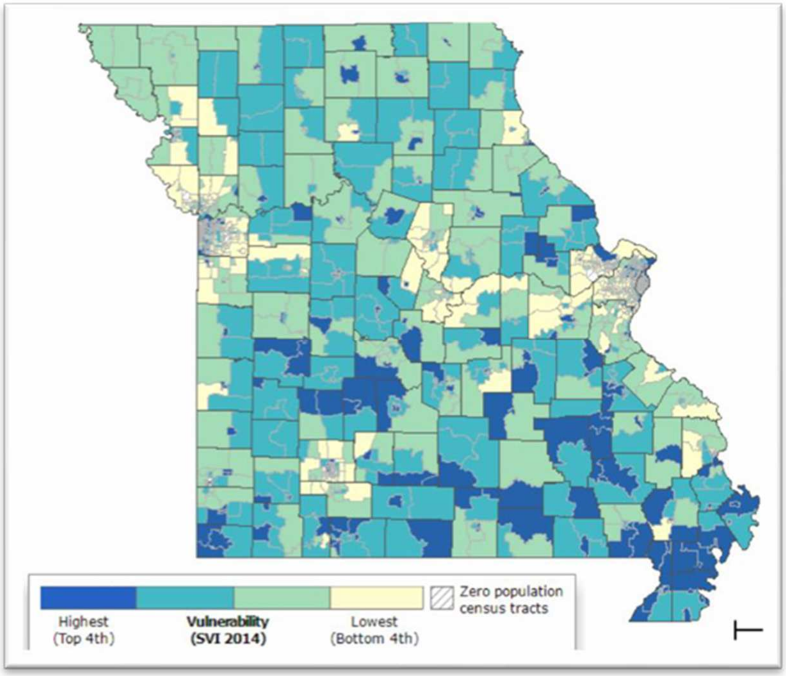
Missourians living in the declared counties are poorer by 35% than the statewide average. The median income is $40,349 compared to $51,713 throughout the state. Poverty affects 14% of the total population and 24.35% of children living in the declared counties live in poverty as compared with 19.2% across the state.

Aging

Missouri is an "aging" state. Its lower cost-of-living and scenic attractions makes Missouri attractive to retirees. The average age of citizens in the declared counties is almost 41 years old compared to 38 years old statewide

Education

Overall across the declared counties, the level of educational attainment is lower than statewide levels as most of the area has experienced an increasingly-aging population and an outflow of younger citizens to other areas. The correlation between education and wage is present in the declared counties with a full 26% difference between the average wages of the southern regions ($34,886) and the state in its entirety ($47,364). The rural character of most of the declared counties limits their ability to attract larger businesses that could provide the kind of employment that younger people seek.



Social Vulnerability

The cumulative effects of the demographics of the declared counties contribute to the social vulnerability of the area. The CDC Social Vulnerability Index (SOVI) was created to help emergency response planners and public health officials identify and map communities that will most likely need support before, during and after a hazardous event. The map illustrates that most of the impacted counties are in the top two quartiles of vulnerability.

The vulnerability of the communities and citizens affected indicate a longer time period and a further distance toward resilient economic well-being. Since the two disasters impacted many families back to back, the ability to recover may be even more strained and difficult.

Economic Conditions

The floods of 2017 affected every declared county – but not in the same manner. Missouri's economy is one of the most diverse in the nation. The diversity protects the state from the extreme lows of economic downturns but likewise it does not experience sharp upward trends. The state is made up of 10 distinct regional economies and five of them are inside of the disaster declared area. Two additional regions have at least one declared county. Negative impacts can certainly be felt within those regional economies or within the communities that contribute to them when large disasters strike. Negative impacts will also be felt differently depending upon the health of the region prior to the flooding event. In many ways, the counties impacted by this disaster did not fare as well in economic terms prior to the flooding event, as compared to the balance of the state as a whole.

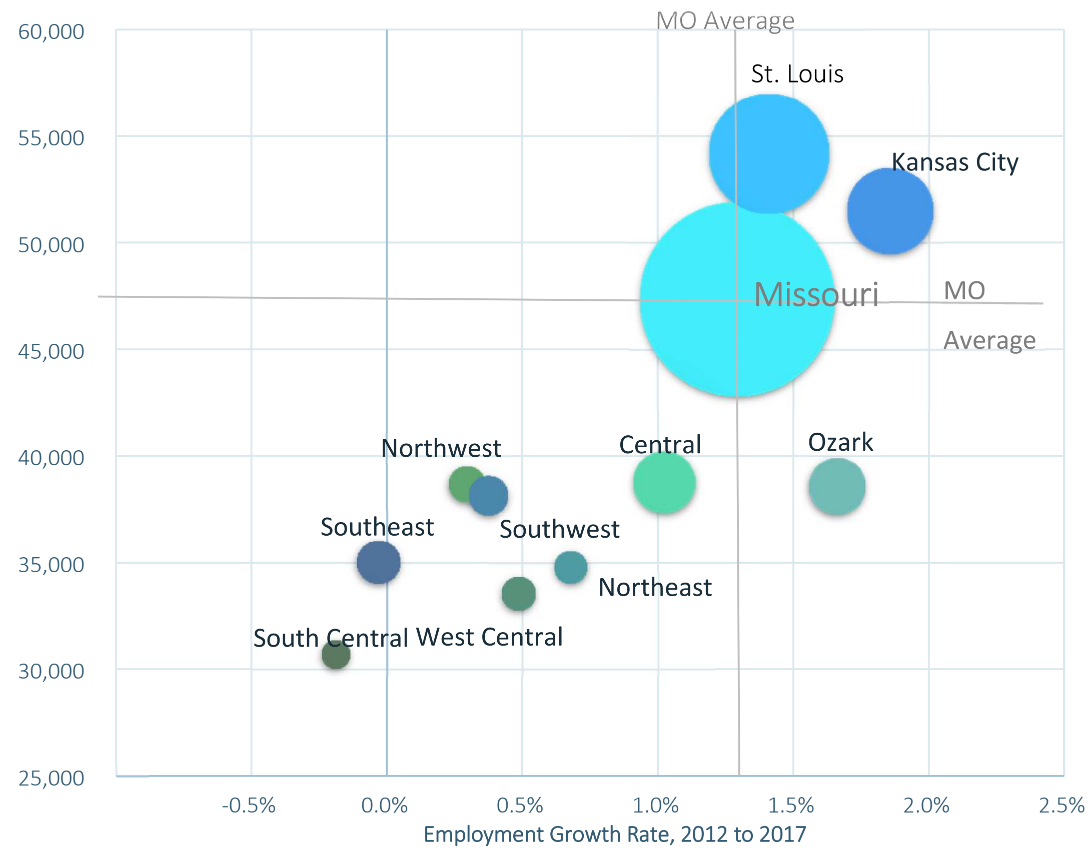
For example, when measuring wages and employment growth, all five of the regions fall in the lower quartile of both factors. Following national trends, Missouri's largest employing regions are experiencing higher levels of growth and higher wages. The Ozark region has been experiencing employment growth, but annual wages are not following suit. None of the declared regions are following the national trend.

Without fail, the leading industries by employment of the all the flood affected regions are healthcare and social assistance, retail trade, accommodations and food service, and manufacturing. The order of the sectors may be unique to the region, but those same four sectors lead each of the affected regions industry size by employment

The existence of accommodation and food services and retail trade is tied to the fact that the five regions represent some of the largest tourism economies in the state. From the iconic St. Louis region to the historic Highway 76 music shows of Branson, to the home of pristine floating, canoeing and rafting rivers to the fishing and boating of the lakes, the tourism industry powers the economy of many of the regions. The sectors of accommodation and food service and retail trade may be the most susceptible to disruptions caused by flooding events. Whether it is damage to structures, inaccessibility, or disruption to goods and services, extensive flooding can cause negative impacts to the local economy. Local governments in small communities that normally thrive on the tourist dollars brought to the area each summer will lose precious sales tax income when flooding eliminates access to water recreation. Businesses that serve the tourism and recreation sector will lose sales, rentals and room nights. When faced with catastrophic physical damage to real and personal property, the losses may cause permanent closure.

For many south-central Missouri communities, it is the water that brings the tourists to their towns, but in massive flooding events, it is also the water that will keep them away.

Missouri Regional Employment and Wages, 2017 Annual Average



Bubble size represents number of employees

Source: Missouri Economic Research and Information Center, Quarterly Census of Employment and Wages

The southwest Missouri region is not as dependent upon tourism. It is home to several manufacturers and is led by the City of Joplin and its unique location servicing the 4-state region. By comparison, its local economy measures stronger than some of its neighboring regions, despite the massive losses incurred in 2011 with the EF-5 tornado.

The southeast region is home to agriculture. Predominantly farmland built from the swamps of the Mississippi delta, the Bootheel region of the state is constructed from a series of ditches and canals. Flooding here is caused when drainage

systems are simply overwhelmed by nature or when the Mississippi River cannot be contained with the series of levee systems built along both sides of its banks. More so than the impact to the agriculture sector is the impact that flooding has on the lives of one of the poorest regions of the state.

The following table of data provided from the census bureau captures the impacts on the local economy through a variety of demographic data. The highlighted sections of the chart indicate the age of persons the area is higher, the housing value is lower, the educational attainment rates are lower, the number of persons with disabilities is higher, the percent of persons in the workforce is lower, the retail sales per capita is lower (which is the most important revenue for many Missouri communities), the median household income is lower and the poverty rates are higher. All these indicators not only impact the local economy, but they also slow the pace of recovery

Factor	Declared Counties	Missouri	United States
POPULATION			
Population estimates, July 1, 2017, (V2017)	3,197,970	6,113,532	325,719,178
Population, percent change – 4-1-2010 to 7-1-2017	1.34%	2.10%	5.50%
AGE AND SEX			
Persons under 5 years, percent	5.92%	6.10%	6.10%
Persons 65 years and over, percent	19.23%	16.50%	15.60%
HOUSING			
Housing units, July 1, 2017, (V2017)	1,466,509	2,792,506	137,403,460
Owner-occupied housing unit rate, 2012-2016	71.09%	66.80%	63.60%
Median value of owner-occupied housing units, 2012-2016	$103,000	$141,200	$184,700
Median selected monthly owner costs -with a mortgage, 2012-2016	$947	$1,210	$1,491
Median selected monthly owner costs -without a mortgage, 2012-2016	$329	$407	$462
Median gross rent, 2012-2016	$600	$759	$949
Building permits, 2017	8,853	18,811	1,281,977
FAMILIES AND LIVING ARRANGEMENTS			
Households, 2012-2016	1,245,689	2,372,506	137,403,460
Persons per household, 2012-2016	2.52	2.48	2.64
Living in same household 1 year ago, percent of persons age 1 year+, 2012-2016	84.69%	84.00%	85.20%
Language other than English spoken at home, percent of persons age 5 years+, 2012-2016	3.65%	6.00%	21.10%
EDUCATION (2012-2016)			
High school graduate or higher, >25 years old	83.52%	88.80%	87.00%
Bachelor's degree or higher, >25 years old	16.67%	27.60%	30.30%
HEALTH			
With a disability, under age 65 years, 2012-2016	14.39%	10.40%	8.60%
Persons without health insurance, under age 65 years, percent	13.37%	10.80%	10.20%
ECONOMY			
In civilian labor force, total, percent of population age 16 years+, 2012-2016	55.79%	62.90%	63.10%
Total manufacturers' shipments, 2012 ($1,000)	47,285,681	111,535,362	5,696,729,632
Total merchant wholesaler sales, 2012 ($1,000)	49,442,871	91,916,351	5,208,023,478
Total retail sales, 2012 ($1,000)	54,903,912	90,546,581	4,219,821,871
Total retail sales per capita, 2012	$ 11,118	$15,036	$13,443
TRANSPORTATION (2012-2016)			
Mean travel time to work (minutes), workers 16 years+	24.06	23.4	26.1
Median household income (in 2016 dollars)	$ 38,846	$49,593	$55,322
INCOME AND POVERTY (2012-2016)			
Per capita income in past 12 months (in 2016 dollars),	$ 20,424	$27,044	$29,829
Persons in poverty, percent	18.53%	13.40%	12.30%
BUSINESSES			
Total employer establishments, 2016	87,229	160,912	7,757,807
Total employment, 2016	1,304,185	2,494,720	126,752,238
Total annual payroll, 2016 ($1,000)	57,299,020	112,072,115	6,435,142,055
Total employment, percent change, 2015-2016	1%	2.10%	2.10%

Section Four – Impact and Unmet Needs Assessment

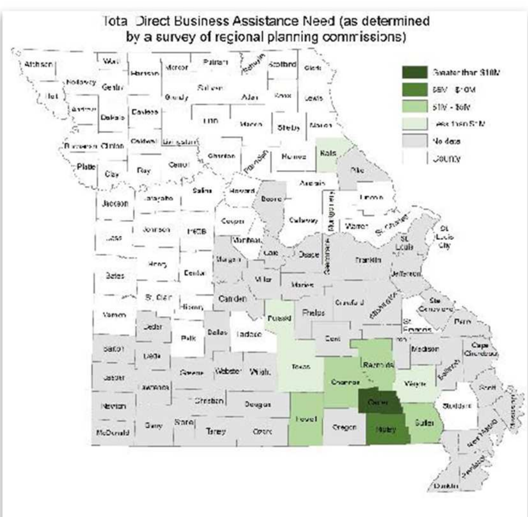
Photograph 7 – Flooding in Steelville

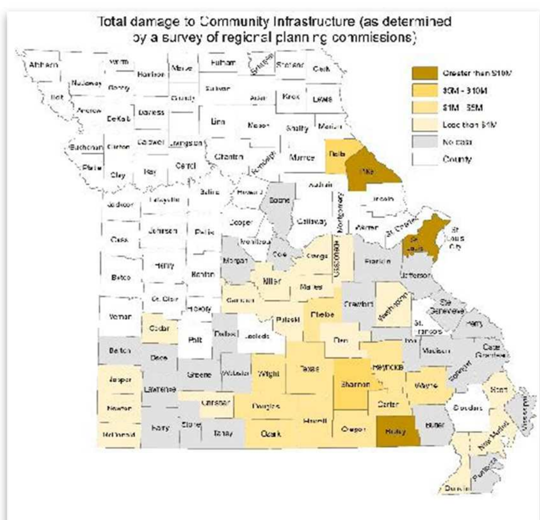
General Impact

Photograph 8 – Photo from State of Missouri Website

The flood caused significant damage to housing, state and local public and private infrastructure, as well as businesses, natural and cultural resources including pristine waters of the state, caves, downtown districts and historic courthouses. The flash flooding was destructive in nature as swift headwater flooding filled streams to capacity from the severe rains and the force knocked structures off their foundations and swept whole buildings downstream. Unlike backwater areas where flooding is slow and often predictable as the waters rise, flash flooding swamped low-water bridges, carrying whole deck surfaces with it. An estimated 25 percent of the flooding occurred in areas outside of the 100-year floodplain. Even with stream gauges located in several rivers and tributaries in the region, warning times were short.

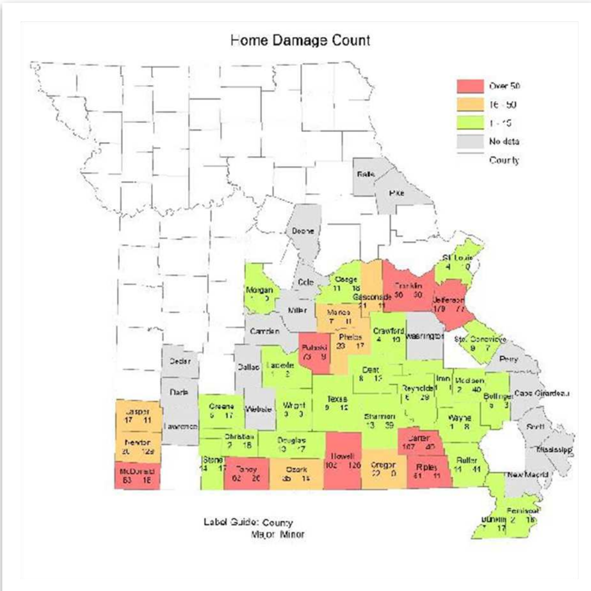
Missouri deployed two tactics to determine and define the unmet need from the 2017 flooding in the broad categories of Housing, Infrastructure and Economic Revitalization. First, the state developed a written needs assessment and survey tool that allowed the collection of data to be aggregated upon receipt. They chose the county level to collect data as that most closely matched the other sources of information available, suited the partners that were engaged in the process, and was most efficient to meet the timeline.

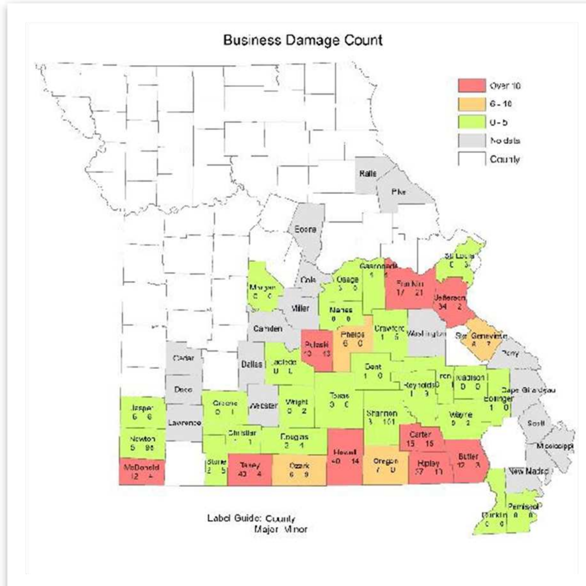


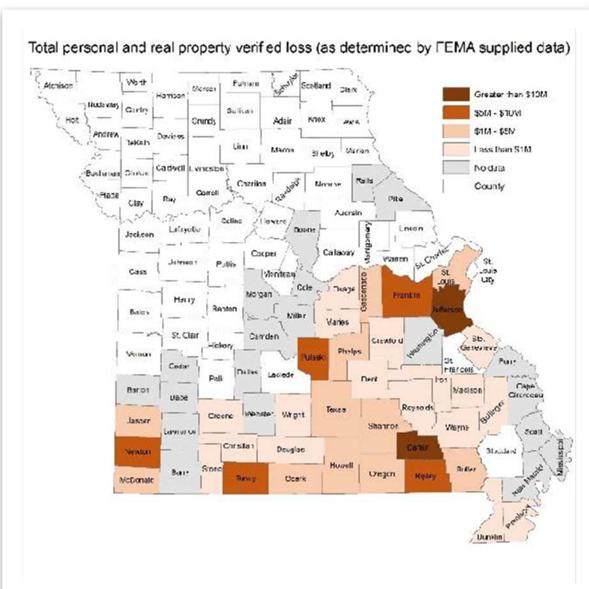


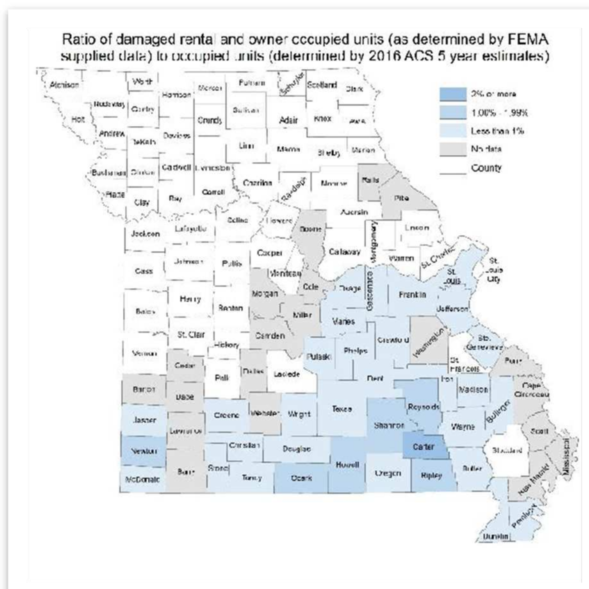
The survey tool collected units of data identified in an Excel format under the broad categories of Housing/Homeownership; Housing/Rental; Infrastructure; Community Facilities; Direct Business Assistance; and Commercial Development. To address information that might be available on the local level, the Department of Economic Development (DED) deployed their partners from the Regional Planning Commissions and Community Action Agencies to identify, collect and report the data from the 55 counties that were declared in the disaster

In addition to the survey data, the DED used available databases from FEMA, SBA and National Flood Insurance Program (NFIP) to extract and extrapolate unmet need by applying assumptions to circumstances based upon eligibility and access to disaster funding









The combination of these two sources makes up the estimated unmet needs in the three categories of Housing, Economic Revitalization and Infrastructure

Missouri 4317-DR	HOUSING	INFRASTRUCTURE	ECONOMIC REVITALIZATION
ESTIMATED UNMET NEED	$103,912,982	$28.4 - $91,144,144	$142,571,947

Housing

Housing Impacts

Housing Impact to Homeowners and Renters

The initial damage assessment information collected April 28, 2017 immediately following the storm identified 5,333 primary residences in 37 counties as either affected by the storms (403), suffering minor damage (1810), suffering major damage (1464) or destroyed (456). Those primary residences included single family, multi-family or mobile homes. In Taney County alone 62 mobile homes were destroyed. Of the 38 counties identified, 35 of them were eventually included in the Individual Assistance disaster declaration. See Appendix F for information on the evaluation of average market rates.

Housing Outcomes – DR-4317

Four thousand four hundred and fifty-four (4454) people reached out to FEMA via telephone, website, or mobile registrations following the flooding events. One hundred and sixty-nine (169) of those calls were from people in 30 other counties not declared for Individual Assistance after the disaster.

The FEMA Individual Assistance Daily Status Report recorded as of November 7, 2017 (following close of active registrations) recorded that they had referred 2,283 homeowners to SBA for a possible home loan.

Of those referred to SBA, only 806 people completed the paperwork necessary for SBA to review for eligibility or qualification. The balance of referrals who did not complete the paperwork totaled 1,477. Since the percentage of households that were uninsured is high, it may be assumed many received no assistance.

3,357 registrants were referred to FEMA's Housing Assistance Program. Of those 1,365 were ineligible, 1,819 were approved, and 49 withdrew.

Of those 1,819 approved, the average Housing Assistance award was $5,628. The total approvals for IA Housing Assistance payments as of November 2017 was $10,237,905.

As of September 22, 2017, of the 806 referred from FEMA to SBA who completed the paperwork, 254 were approved for a home loan, 470 were denied and 82 withdrew.

The reasons for SBA denial were broken down as follows:

- 138 (29%) failed the minimum income test and were referred back to FEMA
- 121 (26%) lacked repayment ability
- 126 (27%) had unsatisfactory credit
- 85 (18%) were deemed ineligible.

Of the 254 approved home loans, the average approved amount was $52,644.

FEMA-4317-DR-MO Preliminary Damage Assessment Results

(1% affected dwellings eligible for IHP)

County	Destroyed	Major	Minor	Affected	Total	Percent Owner	Percent Insured	Percent Low Income	HUD FMR for 2 Bedroom
Bollinger	2	3	3	0	8	100%	0%	50%	$735
Butler	2	10	46	0	58	60%	14%	0%	$672
Carter	12	105	27	13	157	96%	6%	71%	$639
Christian	0	4	4	12	20	80%	45%	15%	$707
Crawford	1	3	19	0	23	26%	0%	91%	$681
Dent	0	2	19	0	21	100%	0%	5%	$637
Douglas	11	6	11	2	30	100%	0%	93%	$637
Dunklin	2	3	18	1	24	24%	13%	8%	$637
Franklin	13	69	21	3	106	24%	49%	65%	$896
Gasconade	7	6	19	0	32	100%	13%	0%	$637
Greene	1	1	10	10	22	95%	59%	45%	$707
Howell	48	108	57	15	228	62%	7%	80%	$697
Iron	1	0	0	1	2	100%	0%	100%	$637
Jasper	11	3	3	11	28	68%	18%	82%	$697
Jefferson	80	116	43	17	256	86%	10%	79%	$896
Laclede	0	2	0	1	3	100%	67%	0%	$637
Madison	0	2	3	39	44	93%	2%	0%	$679
Maries	1	27	0	0	28	100%	4%	11%	$637
McDonald	3	63	13	0	79	90%	32%	24%	$637
Morgan	1	0	0	0	1	100%	0%	100%	$711
Newton	9	126	4	10	149	40%	13%	91%	$703
Oregon	4	18	0	0	22	95%	0%	73%	$637
Osage	5	11	11	2	29	86%	28%	34%	$647
Ozark	28	12	9	0	49	96%	8%	71%	$637
Pemiscot	2	0	17	1	20	95%	0%	0%	$637
Phelps	8	22	4	6	40	88%	35%	5%	$711
Pulaski	16	36	18	12	82	66%	17%	13%	$835
Reynolds	0	6	21	7	34	59%	50%	68%	$637
Ripley	15	40	8	1	64	91%	6%	9%	$637
Shannon	5	4	5	2	16	94%	0%	81%	$637
Ste. Genevieve	1	3	6	4	14	86%	29%	86%	$675
St. Louis	1	20	10	21	52	96%	50%	8%	$896
Stone	8	9	12	2	31	90%	52%	58%	$762
Taney	62	5	21	0	88	55%	30%	70%	$711
Texas	7	2	6	6	21	86%	0%	52%	$637
Wayne	0	1	8	0	9	100%	33%	56%	$637
Wright	2	0	1	3	6	100%	17%	67%	$637
37	**369**	**848**	**477**	**202**	**1896**	**77%**	**17%**	**55%**	**$689**

Housing Impact to Vulnerable Populations

Returning to pre-flood circumstances is not an acceptable alternative for many vulnerable community members. As a community rebuilds its housing, infrastructure and economic base, there is also a necessary effort to improve the opportunities for many citizens. The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act), as amended, contains Section 308, Nondiscrimination in Disaster Assistance which is designed to protect individuals from discrimination based on their race, color, nationality, sex, age or economic status. All recipients of CDBG-DR funding must comply with Title VI of the Civil Rights Act of 1964. HUD 83 FR 5844, requires Grantees to 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. In line with Missouri's method of distribution, the grantee (UGLG) must adhere to this requirement when applying for planning activities.

The U. S. Department of Justice offers guidance to communities undertaking disaster recovery:

1. Reaffirm commitment to non-discrimination protections
2. Engage and include diverse racial, ethnic and Limited English Proficient (LEP) populations
3. Provide meaningful access to LEP individuals
4. Include immigrant communities in recovery efforts
5. Collect and analyze data

In addition to the LEP plan (see Appendix B) and other activities/supportive services to ensure the inclusion of all affected persons, the State CDBG Program must also evaluate the physical infrastructure that supports vulnerable populations such as housing for disabled persons, homeless shelters and transitional housing.

The state relied on three data sources to evaluate the need related to housing for vulnerable persons:

1. The FEMA 1-800 number registration information
2. A county by county survey of unmet need conducted by the Community Action Agencies
3. Interviews and data collection from the Missouri Housing Development Commission (MHDC).

Note: In the immediate aftermath of the flood, the MHDC, their partners at the Community Action Agencies, and members of the Governor's Partnership reached out to vulnerable populations in damaged dwellings in order to connect them to state and local resources.

FEMA data provided the following self-reported circumstances that may be classified as vulnerable:

Vulnerability	Owner-occupied	Renter/ Tenant
Occupied by 62 and older and living alone	326	24
Occupied by persons with disabilities	48	14
Occupied by persons with no reported income	117	98
Occupied by persons with less than 30% MHI	404	293
TOTAL	**895**	**429**

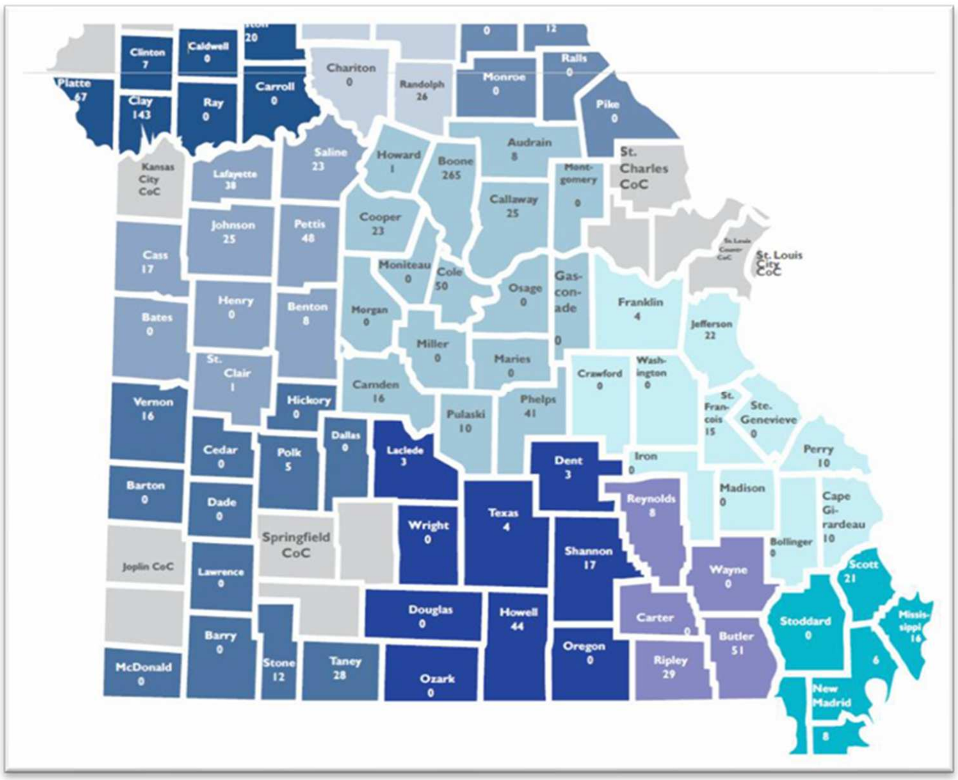
While the unmet need survey performed did not result in consistent responses from every county the total homeless count was on par with the point-in-time survey performed by MHDC. More importantly, the survey did indicate damage to dormitories (68 units), a group home (1), and several transitional housing units (36) which, when combined with the point-in-time survey and the "Statewide Homeless Study" will help to inform a category set-aside of funds to address homelessness in the disaster regions. The total dollar value of unmet need expressed on the surveys was $3.2M.

Citations of need also are sourced from the University of Missouri St. Louis Public Policy Research Center, the MHDC sponsored "Statewide Homeless Study", and the Point in Time Count. There are eight Continuum of Care (CoC) operating in the state; seven that serve metropolitan areas and the eighth which serves 101 non-entitlement Missouri Counties. The disaster counties are served by the Joplin CoC, the Springfield CoC, the St. Louis CoC and the "Balance of State" CoC. Generally, the disaster area regions in the Balance of the State CoC include portions of Region 1, 2, 5, 6, 7, 8, 9 and10.

Balance of CoC Region	Number of Sheltered and Unsheltered Homeless People by Region	Number of Sheltered and Unsheltered Homeless Households by Region
1	61	45
2	12	12
5	439	325
6	78	53
7	88	77
8	71	48
9	60	44
10	154	101

The split between sheltered versus unsheltered is 77% versus 23%, respectively. Homeless sub-populations include 16% with mental illness, 21% with a substance disorder, less than 1% with HIV/AIDS and 24% victims of domestic violence. 100 of the total persons and 98 of the total households are veterans. 104 of the total persons are unaccompanied youth; 28 of whom are less than 18 years of age. Of the counties declared in the disaster, Boone, Butler, Cole, Howell, Phelps and Dunklin are in the top ten counties with the highest homeless population.

STATEWIDE HOMELESS TOTALS BY COUNTY – Source Point in Time Count January 25, 2017



Housing Unmet Needs

The Housing Unmet needs calculated for Missouri counties impacted by the flooding is $103,912,982

Owner occupied and Rental Unmet Needs

The state used a similar methodology of merging multiple sources to capture unmet needs data across all sectors of recovery. Resources for the housing sector included FEMA and SBA data, a survey instrument completed by county through the Community Action Agencies and Regional Planning Commissions and interviews and data from the MHDC. Through the survey process, every Public Housing Authority was contacted with no impacts reported.

FEMA Data - Housing

When using the FEMA data related to both owner-occupied and rental housing, the state chose to deploy a similar method used by HUD in its calculation of unmet need for the five identified most impacted zip codes. The data collected in the 1-800 number registrations was sorted by those owners with real property verified loss (RPVL) and renters with personal property verified loss (PPVL). The data was also sorted by income level to determine the low- and moderate-income persons. Following HUD's process, units were separated into categories of Minor Low Need Value, Minor High Need Value, Major Low Need Value, Major High Need Value, and Severe Need Value. Each of those categories is based upon a value range of reported real property verified loss (for homeowners) or a personal property verified loss (for renters/tenants). Each category is also assigned a multiplier to account for the estimated cost it would take to rehabilitate or reconstruct the home.

State of Missouri Personal Property FEMA Verified Loss 4317												
	# of Units Damaged	# of Units Minor Low (PP FVL < $1000)	Minor Low ($500 multiplier)	# of Units Minor High ($1000 ≤ PP FVL < $2000)	Minor High ($1500 multiplier)	# of Units Major Low ($2000 ≤ PP FVL < $3500)	Major Low ($40,323 multiplier)	# of Units Major High ($3500 ≤ PP FVL < $7500)	Major High ($66,545 multiplier)	# of Units Severe ($7500 ≤ PP FVL)	Severe ($100,947 multiplier)	Total Personal Property Damage
Units with applicable level PPVL with unreported income	98	33	$ 16,500.00	12	$ 18,000.00	20	$ 806,460.00	24	$ 1,597,080.00	9	$ 908,523.00	$ 3,346,563.00
Units with applicable level PPVL occupied by extremely low income (<30% MHI)	293	96	$ 48,000.00	45	$ 67,500.00	38	$ 1,532,274.00	94	$ 6,255,230.00	20	$ 2,018,940.00	$ 9,921,944.00
Units with applicable level PPVL occupied by very low income (30%-50% MHI)	271	86	$ 43,000.00	39	$ 58,500.00	41	$ 1,653,243.00	72	$ 4,791,240.00	33	$ 3,331,251.00	$ 9,877,234.00
Units with applicable level PPVL occupied by low income (50%-120% MHI)	561	172	$ 86,000.00	81	$ 121,500.00	84	$ 3,387,132.00	172	$ 11,445,740.00	52	$ 5,249,244.00	$ 20,289,616.00
Units with applicable level PPVL occupied by moderate income (>120% MHI)	228	83	$ 41,500.00	26	$ 39,000.00	25	$ 1,008,075.00	58	$ 3,859,610.00	36	$ 3,634,092.00	$ 8,582,277.00
Total Units with applicable PPVL	1451	470	$ 235,000.00	203	$ 304,500.00	208	$ 8,387,184.00	420	$27,948,900.00	150	$15,142,050.00	$52,017,634.00

The total estimated unmet need for owner occupied units using FEMA data is $45,524,801. The total estimated unmet need for rental units using FEMA data is $52,017,634

State of Missouri Real Property FEMA Verified Loss 4317												
	# of Units Damaged	# of Units Minor Low (RP FVL < $3000)	Minor Low ($500 multiplier)	# of Units Minor High ($3000 ≤ RP FVL < $8000)	Minor High ($1500 multiplier)	# of Units Major Low ($8000 ≤ RP FVL < $15000)	Major Low ($40,323 multiplier)	# of Units Major High ($15000 ≤ RP FVL < $28800)	Major High ($66,545 multiplier)	# of Units Severe ($28800 ≤ RP FVL)	Severe ($100,947 multiplier)	Total Personal Property Damage
Units with applicable level RPVL with unreported income	117	54	$ 27,000.00	18	$ 27,000.00	15	$ 604,845.00	18	$ 1,197,810.00	12	$ 1,211,364.00	$ 3,068,019.00
Units with applicable level RPVL occupied by extremely low income (<30% MHI)	404	223	$ 111,500.00	61	$ 91,500.00	55	$ 2,217,765.00	46	$ 3,061,070.00	19	$ 1,917,993.00	$ 7,399,828.00
Units with applicable level RPVL occupied by very low income (30%-50% MHI)	403	237	$ 118,500.00	61	$ 91,500.00	40	$ 1,612,920.00	41	$ 2,728,345.00	24	$ 2,422,728.00	$ 6,973,993.00
Units with applicable level RPVL occupied by low income (50%-120% MHI)	834	452	$ 226,000.00	106	$ 159,000.00	109	$ 4,395,207.00	110	$ 7,319,950.00	57	$ 5,753,979.00	$17,854,136.00
Units with applicable level RPVL occupied by moderate income (>120% MHI)	450	255	$ 127,500.00	52	$ 78,000.00	41	$ 1,653,243.00	56	$ 3,726,520.00	46	$ 4,643,562.00	$10,228,825.00
Total Units with applicable RPVL	2208	1221	$ 610,500.00	298	$ 447,000.00	260	$10,483,980.00	271	$18,033,695.00	158	$15,949,626.00	$45,524,801.00

Note: This data provides an estimated unmet need for owner occupied households and rental households in the 35 counties for which there is an Individual Assistance disaster declaration. It does not incorporate potential need for homeowners or renters in the other twenty counties that may have suffered losses and were not included because the County did not receive a declaration.

SBA Data – Housing

When using the SBA data related to housing, the state chose to deploy a methodology used by the State of West Virginia in their calculation of unmet need. West Virginia captured unmet need for persons referred to SBA for loans by applying a similar multiplier theory to persons with a verified loss. The SBA data was sorted by SBA applicants with a verified real property loss. The average verified loss (416 applicants) was $41,574.62 with a total verified loss of persons with damage assessments (both approved and not approved) of $17,295,041. The same multiplier was applied to all applicants without a verified loss. However, since SBA denials sent 385 applicants back to FEMA, those were assumed to have been captured in the FEMA section above.

- Completed SBA Applications 806
- Applicants with verified loss 416
- Applicants returned to FEMA 385
- Remaining applicants with a verified loss 5
- 5 x $41,574.62=$207,873 in additional unmet need

The SBA began its process with 2283 referrals. 385 were returned to FEMA. 806 were given some disposition of their loan application. 1092 remain to be accounted. An estimated 1057 of those received insurance payments (857 were single family claims with an additional 200 claims of "unknown type".

Therefore, insurance covered damages in the amount of $55,379,914. That leaves 35 applicants without disposition.

- 35 x $41,574.62=$1,455,111 in additional unmet need.

Survey Data – Counties Not Declared for Individual Assistance

Since Missouri achieved declarations for Individual Assistance alone, Public Assistance alone, and both Individual and Public Assistance that covered one-half of the counties in the state there was an assumption made of possible household damage in counties not declared for Individual Assistance and therefore not counted in the data kept by FEMA and SBA. Further indication is evidenced in the FEMA Individual Assistance Daily Status Report which indicates 169 calls from persons not in declared counties. In order to ensure coverage of all unmet needs, Missouri reviewed survey information from the non-declared counties. The same SBA average verified loss multiplier will be applied to any households indicated by survey for a total of $7,026,110.

Vulnerable Population Unmet Needs

According to the National Alliance to End Homelessness, the average cost per exit to permanent housing was $4,100 for rapid re-housing; $10,000 for shelter, and about $22,200 for transitional housing. In addition to identifying housing (which may already now be limited based upon flooding), assistance with rent and move-in costs such as deposits, utilities, and temporary rent can stabilize a vulnerable family.

Case management services help homeless families with credit history issues, legal issues, and permanent housing opportunities that would best fit the family needs. Connection to resources such as employment, training, and other services that improve long term well-being and long-term sustainability is key

Number of vulnerable homeowners	= 527
Number of vulnerable renters	= 333
Number of Homeless in Regions affected by flooding (estimated 50% of homeless persons impacted by flooding event)	= 621
Total Vulnerable Persons	=1481

Average per capita funding assistance	x $2822
Estimated Unmet Need for Vulnerable Persons	=$4,179,382

Summary of Unmet Housing Need

FEMA data (owner)	$ 45,524,801
FEMA data (renter)	$ 52,017,634
SBA data (owner)	$ 17,295,041
SBA data (owner – no verified loss)	$ 207,873
Total loss paid by insurance	$ 55,379,914
Remaining applicants without solution	$ 1,455,111
Survey data – non-declared counties	$ 7,026,110
Vulnerable populations data	$ 4,179,382
Total Estimated Unmet Need – Housing	**$183,081,866**

Deductions from Unmet Need

In order to calculate and estimated amount of unmet need for housing, known benefits paid for real property repairs are deducted.

Less Total FEMA Housing Assistance payments as of 11-7-17	$ 10,417,270
Less SBA loans to homeowners as of 10-15-18	$ 13,371,700
Less NFIP payments – housing*	$ 55,379,914
Total Unmet Need – State of Missouri – DR-4317	**$103,912,982**

*includes a majority portion of $18M allocated to housing but marked "unknown type" on NFIP policy payment report

Public Services Unmet Need

Given the current status and the timing between the flooding event and the appropriated CDBG-DR funds, the largest area of identified remaining public service need is housing counseling and legal counseling.

Immediately following the flood and for months after, the Division of Workforce Development and the Department of Labor worked with displaced workers to identify job training and new employment opportunities. The Department of Mental Health and the Department of Health and Senior Services provided outreach and access to services for disaster survivors. The MDHC and the Community Action Agencies identified at-risk persons affected by the flooding, performed wellness checks and established service referral as necessary. A group of non-governmental organizations led by Lutheran Family and Children Services was awarded FEMA Case Management funds by SEMA to provide services to persons reaching out for assistance.

Missouri's network of NGOs, working through the Governor's Partnership, have established a longstanding relationship with service providers and can provide referrals to service providers that work to meet disaster survivor needs.

The HUD-approved consumer credit counseling agencies will aid persons with unmet needs to improve their housing status. Credit counselors will help provide home budgeting assistance, plans to address poor credit or conversion of renters to home owners.

Housing Counseling Organizations

Organization	Services Offered	Languages
Catholic Charities Southern Missouri - Joplin Branch 403 E. 4th Street JOPLIN, Missouri 64801-2209 Phone: 417-624-3790 Fax: 417-624-2709 E-mail: jbeaver@ccsomo.org Website: www.ccsomo.org Agency ID: 90285	- Financial Management/Budget Counseling - Home Improvement and Rehabilitation Counseling - Pre-purchase Counseling - Rental Housing Counseling	- English - Spanish
Community Action Agency of St. Louis County, Inc. (CAASTLC) 2709 Woodson Rd Saint Louis, Missouri 63114-4817 Phone: 314-863-0015 E-mail: N/A Website: caastlc.org Agency ID: 82159	- Fair Housing Pre-Purchase Education Workshops - Financial Management/Budget Counseling - Financial, Budgeting, and Credit Workshops - Pre-purchase Counseling - Pre-purchase Homebuyer Education Workshops - Predatory Lending Education Workshops - Services for Homeless Counseling	- English - Spanish
Catholic Charities of Southern Missouri 424 E Monastery St Springfield, Missouri 65807-6099 Phone: 417-720-4213 E-mail: N/A Website: www.ccsomo.org Agency ID: 81189	- Financial Management/Budget Counseling - Financial, Budgeting, and Credit Workshops - Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling - Pre-purchase Homebuyer Education Workshops - Rental Housing Counseling - Reverse Mortgage Counseling	- English - Spanish
CCCS of Springfield, Missouri, Inc 1515 S Glenstone Ave Springfield, Missouri 65804-1407 Phone: 417-889-7474 Toll-free: 800-882-0808 Fax: 417-881-7713 E-mail: sharmaine@cccsoftheozarks.org Website: www.cccsoftheozarks.org Agency ID: 83533	National Foundation for Credit Counseling, Inc - Financial Management/Budget Counseling - Financial, Budgeting, and Credit Workshops - Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling - Pre-purchase Homebuyer Education Workshops	- English
Catholic Charities Southern Missouri - Van Buren Branch 511 Main Street Van Buren, Missouri 63965 Phone: 573-323-4044 E-mail: rwalters@ccsomo.org Website: www.ccsomo.org Agency ID: 90286	- Financial Management/Budget Counseling - Home Improvement and Rehabilitation Counseling - Pre-purchase Counseling - Rental Housing Counseling	- English - Spanish

Funding Approach

Missouri will deploy a two-pronged approach to ensure that all persons with an unmet need, including those with wide-ranging disabilities including mobility, sensory, developmental, emotional and other impairments have been identified and assessed for assistance.

The first prong is to reach out to known partners that work every day to assist individuals having wide-range disabilities, as listed above, in the impacted areas to determine if there are remaining households that may benefit from assistance. Those organizations include but are not limited to:

- The Governor's Committee to End Homelessness and the relevant Continuum of Care;
- The Missouri Disabilities Councils;
- Lutheran Family and Children's Services and SEMA (Case Management grant 2017 flooding)
- The Governor's Partnership;
- The Departments of Health and Senior Services, Social Services, Mental Health and DESE;
- The Community Action Agencies;
- Faith-based providers, Food Banks and other known local organizations that reach the targeted audience.

The second prong is to establish the mechanism of outreach and referral within the service delivery mechanism as it relates to the funds. If any families were missed because of the needs assessment, each local intake center will have knowledge of and access to the additional expertise and service providers within the region that work in the area specific to the individual need.

The structure of the program delivery method will also enhance the emphasis on serving the public. The deployment of the Community Action Agencies (CAAs) as the organization engaged in the housing recovery will automatically open the door to the myriad of other services that CAAs bring as service providers to communities in Missouri every day.

Benefit of Planning Activities to Housing Impacted and Distressed Areas

Planning funding has been deployed in the region since funding became available after 2008 flooding and 2011 and 2013 flooding. The most successful of those planning dollars were provided to Regional Planning Commissions (RPCs) and Councils of Government (COGs). Each could self-select from a series of planning activities designed in a manner to be replicated in other areas of the state when funding became available. Examples of planning projects included working with local governments in their regions to identify and map all the county low water bridges in the region with overlay detail which includes damage, water heights, closure information and casualties. The information is available to inform and prioritize local bridge improvements. Other examples include pre- and post-disaster long term recovery planning processes and techniques as well as plan content and outline. This flood will be the first time many of those plans are deployed.

Each of the counties in the declared disaster area has a completed hazard mitigation plan. Those plans (also facilitated by the RPCs and COG's) had identified priority projects, including buyouts.

Given the success of the use of CDBG and CDBG-DR funds for planning purposes, the program will allow for planning costs to be included to further develop both pre- and post-disaster plans for the communities identified in the most impacted and distressed areas (5 zip code areas). The plans will be required to take into consideration and complement the existing hazard mitigation plans, the THIRA (Threat and Hazard Identification and Risk Assessment), the emergency management plan and local land use, comprehensive and strategic plans. The Missouri program will enlist FEMA Region VII Community Planning Recovery Support Function staff to support training for the communities and the plans will be modeled after the pilot plans initiated by previous planning dollars. The recovery plans will enhance existing plans by allowing further assessment of hazard risks, including construction standards, review of land use and wetland practices. They will further identify mitigation and resilience opportunities within the community.

Infrastructure

Infrastructure Impacts

A FEMA Public Assistance Summary for DR-4317 indicates the receipt of 248 applicants requesting assistance of which 223 were deemed eligible. The public infrastructure costs derived from the FEMA Project Worksheets total $113.9M, almost

doubling the initial estimate of $57.2M. Almost every category has seen significant increases with Category C, Roads and Bridges increasing from an estimated $32M to

$52M and Category F, Public Utilities increasing from $11M to almost $31M. The federal cost share is listed at 75% or $83.9M and the state and local share as 25% or $63.9M. In Missouri, the state divides the 25% local share between the state government (10%) and the local government (15%).

The largest number of applications for FEMA Public Assistance came from city and county government and special district governments; many of whom suffered total damages greater than their respective annual budgets. Additional applications came from 55 non-profit service providers in the area, one public institution of higher education, four independent school districts, six state government facilities, and two regional government organizations.

Photograph 9 – Newton County Bridge (From MO-DPS)

The significant number of road and bridge repairs is a result of the topography of the area and the number of tributaries that feed the rivers and streams that are prevalent throughout the state and the region. Counties in Missouri maintain a significant number of low water bridges to access remote populations. Often, when the bridges are out, travel times for school buses and ambulances requires miles of detour to find an alternative crossing. The sheer force of the type of flooding experienced causes extensive damage to not only bridge decks but the very pilings and foundations upon which they are built.

Infrastructure Unmet Needs

In order to calculate unmet needs, the Missouri CDBG Program used two methods. The first was to determine the total amount of FEMA Public Assistance project worksheets and calculate the 25% cost share

Infrastructure Unmet Need DR-4317	
Total FEMA Public Assistance	$113,943,186
Total Local Share - Unmet Need	$28,485,796

The second method was through survey, by County, with the assistance of the RPCs. The RPCs were asked to assess unmet need related to the flood, after deducting Public Assistance, insurance, and other benefits. That survey resulted in $91,122,144 in estimated unmet need.

Infrastructure Estimated Unmet Needs by County– Survey Data - October, 2018 Data collected by Regional Planning Commissions			
County	**Infrastructure Amount**	**County**	**Infrastructure Amount**
Barry	$0	McDonald	$120,000
Barton	$0	Miller	$250,000
Bollinger	$0	Morgan	$0
Boone	$0	New Madrid	$331,000
Butler	$0	Newton	$420,000
Camden	$229,505	Oregon	$2,504,500
Cape Girardeau	$0	Osage	$117,000
Carter	$3,137,500	Ozark	$4,056,474
Cedar	$346,336	Pemiscot	$0
Christian	$16,898	Perry	$0
Cole	$0	Phelps	$1,583,200
Crawford	$0	Pike	$15,252,056
Dade	$0	Pulaski	$414,338
Dallas	$0	Ralls	$9,264,860
Dent	$525,000	Reynolds	$4,350,000
Douglas	$2,025,000	Ripley	$11,005,000
Dunklin	$356,718	Scott	$220,000
Franklin	$0	Shannon	$5,170,000
Gasconade	$6,000	St. Louis County	$16,070,355
Green	$0	St. Genevieve	$0
Howell	$3,945,000	Stone	$0
Iron	$0	Taney	$0
Jasper	$20,000	Texas	$2,547,500
Jefferson	$0	Washington	$217,904
Lawrence	$0	Wayne	$4,000,000
Madison	$0	Webster	$0
Maries	$75,000	Wright	$2,545,000
GRAND TOTAL SURVEYED UNMET INFRASTRUCTURE NEED BY COUNTY			**$91,122,144**

Summary of Unmet Need – Infrastructure = range $28.4M – $91.1M

Economic Revitalization

Business Impact

940 businesses were referred to SBA for business loan assistance. To date, 81 business loans have been approved. The average loan amount is $218,153.

The average real estate verified loss is a combination of two reported fields in SBA data: Verified RE Reconstruction and Verified RE Repairs.

To date:

- 608 business have not returned the application issued to them by SBA.
- 129 business applications are under review by SBA.
- 66 applications have been declined.
- 56 applicants withdrew.

Economic Impacts

Missouri's economy is equally as diverse as its geography. The strength of the economy lies in its varied regions: from the agricultural belt in the north, to the hospital-education-government complex in the central region to its tourism sector in the Ozarks, to the cosmopolitan and economic centers of St. Louis and Kansas City. The economic diversity is one of the strongest in the nation and is combined with one of the lowest costs of living.

Tourism

Tourism in Missouri generated a $16.8 Billion impact in FY17 according to the Division of Tourism 2017 Economic Impact Study. There were an estimated 42 million visitors to the state. Visitor expenditures in tourism-related industries (as defined in state statute) indicated $13.3 billion in 2017 with an average $100 per person, per day. Tax revenues for Missouri exceeded $1.4B in local and state taxes. Jobs related to the tourism marketed are estimated at 313,362, which is over 8 percent of Missouri's overall employment.

Visitor activities in the southern area of the state, especially in the disaster declared counties include rural sightseeing, historic sites, music shows and musical theater, theme parks, parks and recreation, fishing, wildlife viewing, theater and drama, camping, motor boat and jet-ski and other water sports. Missouri's natural beauty makes it one of the leading tourism centers in the Midwest states.

Agriculture

The contribution of agriculture to the Missouri economy cannot be understated. The industry is diverse with strengths in grains and oilseeds as well as cattle and hog farming. A 2016 report sponsored by the Missouri Department of Agriculture, Missouri Agriculture and Small Business Authority and the Farm Bureau found agriculture, forestry and related industries contributed $33 billion in value-added impact to the state. Within those sectors, crops, livestock, forestry and fisheries contributed $9.4 billion; agriculture inputs and services contributed $5 billion; food and related products manufacturing contributed $15.5 billion and forestry products manufacturing contributed $3.2 billion.

The top three contributors to Missouri's economy are breweries, oilseed farming, and pet food manufacturing respectively.

The 2017 flooding impacts were realized in both the tourism and agriculture sectors. Both are water dependent and too much or too little will cause great losses in terms of economic impacts.

Estimated Economic Revitalization Unmet Need

The State CDBG used SBA information to determine unmet needs in the Economic Revitalization Category.

Category	Number	Average	Total
SBA Applicants with a Verified Loss	167	$158,205	$26,420,317
SBA Applicants without a Verified Loss	773	$158,205	$122,292,465
		Total Unmet Economic Need	$148,712,782
		Less SBA Loans Approved	($ 3,656,400)
		NFIP Claims – Business	($ 2,484,435)
		Total Unmet Economic Need	**$142,571,947**

Drivers of Economic Resilience

In today's economy, key drivers of economic resilience can be gained by implementing strategies that address the regional economy, the individual business, and the worker.

For Missouri workers, the number one way to build personal economic resilience is through education and job training. That strategy also pays great dividends toward the growth of a regions business sector.

Since access to a skilled workforce is the number one driver of business location and expansions in the state (and nation) delivering such a workforce is key to a region's economic success. By partnering with 2- year and 4-year institutions and technical and trade schools, Missouri is identifying the industry and job classification demands of today and tomorrow and matching opportunities for Missourians to access training and re-training that will allow them to flourish. This is the premise of the "Talent for Tomorrow" initiative.

Disasters may well displace workers, but they cannot displace the skills carried by the workforce. Transferable skills increase personal resilience.

The ten regional economies in the state provide the economic diversity that the state enjoys. But planning and providing the same resources, the same expectations and measuring the same outcomes over ten very different regional economies will not serve them in the most efficient manner. Instead, identifying regional strengths and weaknesses and creating independent regional economic strategic plans that will enhance the strengths and correct the weaknesses will provide the communities within the region a much higher probability of overall economic success. This is the premise of the "Best in the Midwest" initiative.

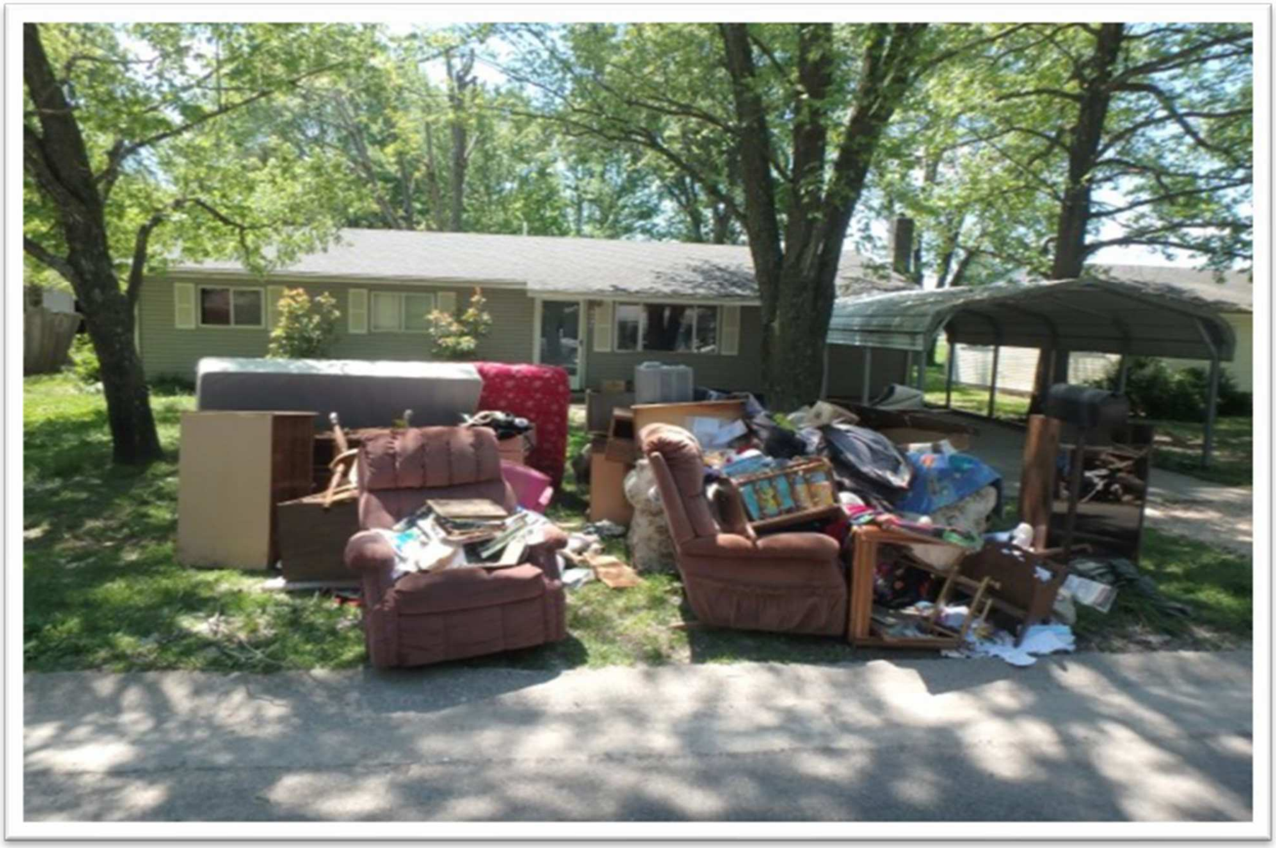
One component of that regional economic strategic planning is the incorporation and integration of economic resilience strategies which may include, but not be limited to:

- Improvements to physical infrastructure that mitigates disaster damage and limits impacts to businesses;
- Increasing the number of businesses with continuity plans (including supply chain disruptions and market or customer interruptions);
- Increasing the number of businesses with NFIP;
- Incorporating commercial buyouts as part of an overall mitigation plan;
- Increasing the space for entrepreneurs and start-up businesses that may replace business loss as a result of damage from a disaster;
- Support of unique and unconventional training programs that are designed and suited to meet the needs of the local economy;
- Creating inclusive strategies to address lessor skilled worker into the workforce.

Understanding and recognizing the threats is only half of the equation to creating a resilient economy. The National Association of Counties describes economic resilience as a community's ability to foresee, adapt to, and leverage changing conditions to their advantage. The U.S. Department of Commerce notes that economic resilience has three "primary attributes: the ability to recover quickly from a shock; the ability to withstand a shock; and, the ability to avoid the shock altogether." As the economy becomes more nimble, successful actions and reactions will be those that mirror that flexibility.

Finally, incorporating resilience building techniques and strategies into the MDRF, and in this case the Economic Recovery Support Function, can assist in shifting the focus by bringing attention to opportunities both before and after a disaster

Section Five – Method of Distribution & Connection to Unmet Need



Photograph 10 – Neosho, Missouri (Courtesy of Economic Security Commission)

Methods of Distribution

Accessing Disaster Funds

Missouri will use a Method of Distribution that allows Eligible Cities and Counties to apply for funds from the CDBG-DR Program under a series of Program Categories which are laid out over a Program Year and based upon either calendar deadline dates per Category, or an open-cycle (first-come/highest) process (see Program Summary Budget). Upon receipt of CDBG-DR award, the unit of local government is the administering entity for program activities. The State will provide training and technical assistance.

Federal Priority Funding – Distribution Ratios

80% of Funds

HUD has provided, by rule, that all funds shall first serve unmet needs in housing with 80 percent of the funds prioritized in 5 zip code areas:

63935 – Doniphan area
63965 – Van Buren area
64850 – Neosho area
65616 – Branson area
65775 – West Plains area

20% of Funds

The remaining 20% of the funds are available to the Counties with a presidential declaration under DR-4317 (see map, page 12).

Federal Priority Funding - Housing

HUD has also provided, by rule, that the unmet needs in the housing sector be addressed prior to entertaining any application for funds under the categories of Economic Revitalization or Infrastructure.

NOTE: The State CDBG Program Method of Distribution for funding under the categories of Infrastructure and Economic Revitalization will come as an amendment to this Action Plan. That amendment will constitute a substantial change to this document and a publicized draft, notification and comment period will accompany the amendment, allowing and encouraging citizen input. The needs assessment data found in this document may be refreshed at that time. Distribution of funds under categories will take into consideration the most impacted communities and the unmet needs. The burden to prove that all housing unmet needs have been addressed is a requirement of the state, prior to accepting applications under other categories. Permission from HUD will be required, through acceptance and approval of the Action Plan amendment.

State CDBG Priority Funding

The state CDBG Program will prioritize funding based upon an evaluation using 100-point scoring criteria. Within this matrix will be a criteria called “Priority Most impacted” that provides up to 5 points for the most impacted communities. The 5 zip codes identified in the Federal Priority Funding - Distribution Ratio (see paragraph above) will be automatically awarded five points to this criteria. Disaster declared areas outside the 5 zip codes will be awarded points based on their assigned 1-5 value. This calculation will be made by measuring a combination of the county damaged housing units as a percent of total housing units as found within the “Damage Assessment for Counties Eligible for Individual Assistance” chart and the County Social Vulnerability Index as found in Appendix E . The two scores will be averaged with the final result applying to their “Priority Most impacted” criteria. This assigned 1-5 value matrix can be found in Appendix E. The State CDBG Program will prioritize funding based upon an evaluation using 100-point scoring criteria.

Eligible Applicants

Units of General Local Government (UGLGs), cities and counties only, within the 55 counties presidentially declared under DR-4317 (see map page 12). The only exception to the City and County applicants falls under the Category of Planning where Regional Planning Commissions may apply direct to the CDBG Program for planning funds.

Eligible Sub-Applicants/Sub-Recipients

City and county governments may choose to partner with eligible quasi-governmental agencies or non- profits.

Priority Sub-Applicants/Sub-Recipients

Priority consideration will be given to applications from cities and counties that partner with Community Action Agencies and RPCs/COGs as sub-applicants.

Program Categories

Categories indicate the use of funds for a specific purpose. This Action Plan defines the categories of funds under Housing (see Program Summary Budget and Housing Program Detail). The categories define the specific purpose, the total funds allocated to the category, the application method for accessing funds, deadline dates for applications within the Category, the maximum amounts available per applicant and the maximums per beneficiary.

Program Year

The year beginning at the point in which the agreements are executed between HUD and the State of Missouri. The program regulations provided that CDBG-DR funds are to be expended in six years.

Application and Guidelines

Each program Category will have an accompanying application form and guidelines Cities and Counties may use to submit their requests to the State CDBG Program.

Disaster Website

CDBG-DR will maintain a website at www.ded.mo.gov which will contain a copy of the Action Plan, Action Plan amendments, application status reporting for grantee and beneficiaries, procurement information including contracts for outside services, a contractor complaint hotline and general contact information, and more. A complete list of website content is available in APPENDIX A in this action plan document.

Policies and Procedures

A manual outlining the Policies and Procedures associated with the use of CDBG-DR Funding will be available at: https://ded.mo.gov/DisasterRecovery . In addition to the federal compliance areas of procurement, citizen participation, financial management, labor standards, equal opportunity and fair housing, environmental review and contract management, the manual will include housing quality standards and construction standards related to housing rehabilitation, housing reconstruction and new construction, duplication of benefits requirements and processes, deed restrictions and applicable Uniform Relocation Act requirements, Optional Relocation Plans, resolutions related to flood insurance requirements, Program agreements and contract documents, beneficiary intake forms, etc. In regard to applicable Uniform Relocation Act requirements, the State will define "demonstrable hardship" in the policies and procedures.

Training and Technical Assistance

The complexity associated with using CDBG-DR funds requires training and technical assistance to ensure that project goals are achieved while remaining compliant with program rules and regulations. The CDBG Program will offer training opportunities to interested parties at the application stage and the new grantee training stage. Training to build capacity will be implemented throughout the year by focusing on specific program compliance areas. Technical assistance is available to every potential application, sub- applicant, and professional service provider throughout each stage of the

process. The Missouri CDBG Program employs regional field representatives assigned to specific areas of the state, as well as specialists, who maintain expertise in certain fields such as housing, economic development, and infrastructure and compliance areas such as procurement, equal opportunity and fair housing, Uniform Relocation Act, labor standards, financial management, and environmental review.

Application Evaluation

Housing Assistance

Each application for Housing Assistance will be evaluated based upon the following criteria and scored on a 100-point scale:

Criteria	Definition	Points
Unmet Need	The extent to which there is quantified unmet need identified in the project area.	0-25 points
Impact	The extent to which application activities will directly address unmet need.	0-25 points
Project Readiness	The extent to which applicants have completing pre-project planning including but not limited to: the environmental review, pre-beneficiary screening, conditional procurement of services.	0-20 points
Priority Partners/Organizational Capacity/Experience	Priority consideration will be given to applications from cities and counties that partner with Community Action Agencies and RPCs/COGs as sub-applicants.	0-10 points
Priority Most Impacted	A measure of the applicable counties damage to occupied housing units as a percent of total occupied housing units and a county SOVI score (See Appendix E).	0-5 points
Local Effort	Percent of financial and in-kind participation.	0-5 points
Consistency with Hazard Mitigation or other Local Recovery Plan and Resilience building components	Project identification in plan or project consistency with plan.	0-10 points
TOTAL		**100 points**

CDBG-DR Program National Objectives

1. OVERALL REQUIREMENTS:
   a. 80% ($46,828,000) of the total grant amount ($58,535,000) must benefit the Most Impacted and Distressed (MID) areas determined by HUD to be Doniphan (63935), Van Buren (63965), Neosho (64850), Branson (65616) and West Plains (65775). The remaining 20% of funds ($11,707,000) will be available to benefit other declared counties determined by the state to be MID areas.
   b. 70% of the total funds must benefit low- to moderate-income (LMI) persons (approximately $41 million) All funded activities must meet 1 of 3 national objectives:
      i. Benefit persons of low- and moderate-income, or
      ii. Aid in the prevention or elimination of slums or blight, or
      iii. Meet other urgent community development needs
   c. Programs must stem from an unmet recovery need not already addressed by other federal, state/local, nonprofit funds, or private insurance. Grantees will be required to document a connection to the disaster.
2. THE PRIORITIES OF THE STATE SHALL BE TO:
   a. Address needs of the most vulnerable populations.

b. Address the needs of low- to moderate income persons and families.
Mitigate potential risk and hazards taking into account possible future extreme weather events and other natural hazards and long-term risks.

Program Budget and Maximum Assistance Amounts

Category	Program	Maximum	Total Allocation Not less than 80% to be expended in the)5 Zip Codes	% of Total Allocation
Administration			**$2,926,750**	**5%**
Planning			**$1,500,000**	**2.5%**
Public Service			**$1,525,000.00**	**2.5%**
	Vulnerable Population Unmet Needs			
	Program Activities:			
	** Rapid Rehousing*	*$200,000 per grantee (UGLG)*		
	** Case Management Services/ Homeless*	*$50,000 per grantee (UGLG)*		
	** Case Management Services/ Housing*			
Housing			**$52,583,250.00**	**90%**
	Voluntary Local Buyout and Acquisition Program			
	Program Activities:			
	** Residential Buyout and Demolition*	*fair market value of property, minus duplication of benefits*		
	** Relocation Assistance Program*	*up to $50,000 per household*		
	** Tenant Relocation Assistance*	*up to $7,200 per household*		
	Homeownership and Renter/Tenant Assistance Program			
	Program Activities:			
	** Rehabilitation - Inside 100-year Floodplain*	*up to $40,000 per household*		
	** Rehabilitation - Outside 100-year Floodplain*	*up to $40,000 per household*		
	** Reconstruction - Outside 100-year floodplain*	*up to $100,000 per household*		
	** Down Payment Assistance*	*up to 25% total cost of house, plus closing costs*		
	** Tenant Relocation Assistance*	*up to $7,200 per household*		
	Affordable Multi-Family Rental Recovery			
	Program Activities:			
	** New Multi-Family Housing paired with LIHTC*	*up to $5,000,000 per development (UGLG)*		
	New Construction – Replacement of Affordable Housing Stock			
	Program Activities:			
	** Infill Housing for Affordable Homes*	*up to 25% total cost of (single family) house, plus closing costs (Grantee/UGLG)*		
	Vulnerable Population Unmet Needs			
	Program Activities:			
	** Construction / Rehabilitation*	*up to $750,000 per grantee (UGLG)*		
Total Funds Allocated			**$58,535,000.00**	**100.00%**

Categorical Adjustment – DED retains the ability to transfer up to 25% of the total CDBG-DR allocation, for use as needed among categories, not to exceed HUD established maximums.

Program Budget, 80/20 Split and Percent of Low- and Moderate-Income Persons

Category	Program	Most Impacted Areas (80%) Zip Codes	Most Impacted Areas (20%) Counties declared in DR-4317	Total Allocation	LMI Amount (70% of Total Allocation)
Administration		$2,341,400.00	$585,350.00	**$2,926,750.00**	N/A
Planning		$500,000.00	$1,000,000.00	**$1,500,000.00**	N/A
Public Service		$1,075,000.00	$450,000.00	**$1,525,000.00**	$1,525,000.00
	Vulnerable Population Unmet Needs *Program Activities:* ** Rapid Rehousing* ** Case Management Services/Homeless* ** Case Management Services/Housing*				
Housing		$42,911,600.00	$9,671,650.00	**$52,583,250.00**	$39,449,500.00
	Voluntary Local Buyout & Acquisition Program *Program Activities:* ** Residential Buyout* ** Relocation Assistance Program* ** Tenant Relocation Assistance*				
	Homeownership and Renter//Tenant Assistance Program *Program Activities:* ** Rehabilitation - Inside 100-year Floodplain* ** Rehabilitation - Outside 100-year Floodplain* ** Reconstruction - Outside 100-year floodplain* ** Down Payment Assistance* ** Tenant Relocation Assistance*				
	Affordable Multi-Family Rental Recovery *Program Activities:* ** New Multi-Family Housing paired with LIHTC*				
	New Construction Single Family *Program Activities:* ** Infill Housing for Affordable Homes*				
	Vulnerable Population Unmet Needs *Program Activities:* ** Construction / Rehabilitation*				
Total Funds Allocated		**$46,828,000.00**	**$11,707,000.00**	**$58,535,000.00**	**$40,974,500.00**

Program Budget as Compared to Unmet Need

	Budget Amount	**Unmet Need**
Housing		
	$52,583,250	**$103,912,982**
Admin		
	$2,926,750	**N/A**
Planning		
	$1,500,000	**N/A**

Single Family Owner Occupied- 100% of the unmet need covered in budget

Multifamily - with required leverage by LIHTC credits estimate 100% need covered in budget Vulnerable Housing - 100% of need covered in budget

To calculate need by category, all insurance was deducted from need, no FEMA or SBA was deducted.

NFIP payments marked "unknown category" were proportioned amount single family, multifamily and business claims

Leveraging of Funds

Housing

The state has, and will continue to encourage the leveraging of funding for housing from the:

- MHDC HOME Investment Partnership, HERO program, state and federal low-income housing tax credits (both 4% and 9%) and Emergency Shelter Grant program,
- Department of Economic Development, Division of Business and Community Services, CDBG Program and Neighborhood Preservation Tax Credit Program
- Department of Economic Development, Division of Energy, Weatherization Program
- U.S. Department of Agriculture - Rural Development
- U.S. Department of Housing and Urban Development
- Department of Public Safety, State Emergency Management Agency, Hazard Mitigation Program
- Small Business Administration, Home Disaster Loan Program
- the non-governmental philanthropic organizations, non-profit development organizations
- private sector development community
- disaster survivor financial participation and sweat equity (to the extent feasible and practical).

The goal is to facilitate housing rehabilitation, reconstruction and new construction of affordable single- family homes and multifamily dwellings in a manner consistent with the need in the areas most impacted. Care will be taken to consider design and demand suitable to the market.

The Method of Distribution for CDBG-DR funding will place priorities and provide points for amounts of leveraged investment in housing projects.

Economic Revitalization:

- The state has and will continue to leverage funding assistance for economic revitalization from the SBA business loan and economic injury disaster loan program
- EDA disaster funding for commercial revitalization, planning and infrastructure development activities that support business development
- Missouri Development Finance Board Small Business Loan Program
- Missouri Department of Economic Development, Division of Tourism, matching tourism marketing grant program
- Local non-profit and quasi-governmental revolving business loan programs
- USDA Rural Development business lending and infrastructure development programs
- Missouri Department of Transportation Economic Development set-aside for transportation in direct support of business development

The goal is to facilitate business retention and expansion in support of the restoration of the negative impacts to the regional economy.

Note: At the point that the unmet housing need is exhausted, the CDBG Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of economic revitalization and infrastructure.

Infrastructure

As part of the initial response to the disaster, the state CDBG Program established a system for notification by the FEMA and SEMA Public Assistance programs when communities were hesitating to engage in Public Assistance projects because of the cost of the local match, and when communities were hesitating to engage in Public Assistance projects with additional mitigation activities because of the cost of the local match. Based upon this partnership, CDBG worked to

support local eligible communities with matching funds to allow the projects to take advantage of the federal Public Assistance dollars as well as take advantage of additional mitigation design elements.

CDBG also worked with its partners at the Missouri Development Finance Board to establish a small community line of credit for cities, towns, and villages that were suffering cash flow shortages as a result of the costs of the initial police protection, debris removal and public safety actions and the related decrease in the normal revenues paid by sales tax due to interruptions of businesses and tourism.

The CDBG Program enjoys strong ties to infrastructure funding partners in the state and has co-sponsored the Missouri Water and Wastewater Review Committee for more than 15 years. The Committee is made up of the Missouri Department of Natural Resources and the Rural Development State Offices of the USDA; the agencies that represent the largest public infrastructure financing in the state.

In addition, CDBG has also had longstanding partnerships with the:

- US Army Corps of Engineers,
- Economic Development Administration
- Missouri Department of Transportation
- Local statutory authorities of Community Improvement Districts, Transportation Development Districts, and Tax Increment Financing Districts.

The goal for the use of the CDBG-DR funding is to continue the track record of leveraged investments.

Note: At the point that the unmet housing need is exhausted, the CDBG Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of economic revitalization and infrastructure.

Housing Programs

Purpose

The Housing Assistance Program (HAP) is intended to assist eligible Missouri applicants whose primary residences were directly or indirectly impacted by the disaster flood events of 2017. The Department of Housing and Urban Development appropriated $58,535,000 in Community Development Disaster Recovery (CDBG-DR) funding to the State of Missouri. The allocation was appropriated under HUD's Federal Register Notice published on Tuesday, August 14, 2018 at 83 FR 40314; and the Federal Register Notice published on Friday, February 9, 2018, at 83 FR 5844 (prior notice) that describe the allocation's applicable waivers and alternative requirements. The funds must primarily address unmet housing needs.

The Housing Assistance Programs established by the State will identify opportunities for public housing, affordable housing and housing for vulnerable populations and address the rehabilitation, reconstruction and replacement of affordable housing stock in the areas affected by the disaster. This includes any rental housing that is affordable to low- or moderate-income households.

The primary focus of the HAP is to provide relief for survivors affected by the disaster event, while complying with all CDBG-DR requirements, as well as addressing recognized impediments to fair housing choice as required under the Fair Housing Act. Various target populations are eligible to be served, including homeless, special needs, and other vulnerable populations.

CDBG-DR funds received by the state will be used in the recovery efforts from the 2017 Storm and Flooding event for specific disaster-related purposes. The program will ensure close and ongoing coordination with service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impact is brought to the State's attention for a coordinated approach. In addition, any vulnerable populations brought to the State's attention who are not served under the housing recovery programs may be referred to specialized service providers for assistance. The State has set aside funds in this allocation to address needs for Vulnerable Populations. While the objectives below are not all-

inclusive, this list highlights the direction of the program. All applications for housing activities should consider the following objectives:

- Primary residence located in the most impacted and distressed areas designated by HUD for 80% of the funds. The remaining 20% of the allocated funds provide for opportunities in federally declared counties.
- Grantees must address unmet housing recovery needs that resulted from a direct or indirect impact from the disaster. Only structures that serve as the primary household will be eligible. These structures must have been occupied at the time of the disaster.
- The Homeowner Assistance Program has eligibility requirements for rehabilitation in the floodplain. Only homeowners who either maintain flood insurance or have incomes under 120% of the Average Median Income may qualify for rehabilitation assistance. However, to receive assistance and remain in the floodplain, flood insurance must be maintained.
- As the intent is to move people out of areas that are prone to flooding or at a higher risk of flooding, there will be no rehabilitation conducted in the floodway, and no rental rehabilitation conducted inside the 100-year floodplain. Other housing alternatives may be available and sought.
    - Floodplain: The 100-year floodplain is defined as the area subject to inundation from a flood having a one percent or greater chance of being equaled or exceeded in any given year [as identified by FEMA].

    - Floodway: The floodway is defined as the portion of the floodplain which is effective in carrying flow, where the flood hazard is generally the greatest, and where water depths and velocities are the highest. The term “floodway” as used here is consistent with “regulatory floodways” as identified by FEMA.
- Priority consideration will be given to applications that include assisting vulnerable populations such as the homeless and at-risk of homelessness, disabled persons, elderly persons, and families with children, especially those with incomes below 30 percent of the area median income.
- Grantees must determine when the cost of rehabilitation or reconstruction of a structure will not be cost-effective relative to other means of assistance, such as buyout of the property, or offering different housing alternatives.
- Program Design Standards emphasize high quality, durability, energy efficiency, sustainability and mold resistance. Grantees must comply with minimum standards established by the program or local code ordinance, whichever is stricter. Minimum standards include compliance with HUD Housing Quality Standards (HQS). New housing construction, and reconstruction or rehabilitation meeting the substantial damage/improvement definition, must include compliance with one of the Green Standards outlined in the policies and procedures implementation manual. Grantees are also strongly encouraged to incorporate a Resilient Home Construction Standard, meaning that all construction meets an industry-recognized standard such as those set by the FORTIFIED Home standards. Rental units will also follow decent, safe, and sanitary housing quality standard requirements, and will have affordable rent that is no more than 30% of the household’s adjusted gross income. The grantee will utilize income limits as published by HUD on an annual basis. These income limits are posted on the DED website, which can be accessed at: https://ded.mo.gov/content/community-development-block-grants
- Rehabilitation of homeowner occupied households may be allowed in the 100-year floodplain. CDBG-DR assistance provided for repairs of substantial damage, defined as over 50% damaged, must include elevation of the structure with the lowest floor, including the basement, at least two feet above the base flood elevation. Note: This elevation standard may be above the local ordinance but is a program requirement. The total cost for rehabilitation and elevation must be cost effective when compared to different housing alternatives.
- All Grantees and sub-grantees, and all program participants, must consent to a Duplication of Benefits review by signing the Duplication of Benefits Release Authorization form. In order to receive CDBG-DR assistance, a Duplication of Benefits review will be conducted to determine any previous disaster assistance received from any

source, including insurance. Any previous assistance received for the same purpose as CDBG –DR funds must be deducted.

The HAP is intended to supplement other funds the owner received to repair or reconstruct the structure. The unmet housing needs of renters/tenants, homeless including at-risk of homelessness persons and persons with disabilities, will also be addressed. Funded housing activities may include the rehabilitation of vacant housing units or construction of new housing units not damaged by the disaster, if activities clearly address a disaster related impact from being in a disaster-affected area. Additionally, Missouri will award CDBG-DR funds to local units of government for voluntary residential buy-outs at pre- flood fair market value.

An implementation manual will be made available as a resource for CDBG-DR recipients in the administration of disaster recovery grants. It will provide guidance regarding the general requirements and checklists to ensure compliance with applicable laws and regulations. Grantees will be required to submit quarterly performance reports to DED during the life of the project.

Ineligible Activities

Ineligible activities identified in the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, are the use of CDBG-DR for forced mortgage payoff, construction of dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, or assistance for second homes and activities identified in 24 CFR 570.207. All activities and uses authorized under Title I of the Housing and Community Development Act of 1974 allowed by waiver, or published in the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, are eligible. Eligible use of CDBG-DR funds in a floodway are restricted to voluntary buy-outs.

The Missouri DED will not limit any eligible activities beyond what is specifically excluded by HUD to allow communities as much flexibility as possible.

Housing Assistance Program Outline

The HAP consists of five main program delivery methods designed to address unmet housing needs:

1. Voluntary Local Buyout and Acquisition Program
1.1. Residential Buyout Program
1.2. Relocation Assistance
1.3. Tenant Relocation Assistance
2. Homeownership and Tenant Assistance Program
2.1. Rehabilitation Program – Homes Inside 100-year Floodplain (Owner-Occupied Only)
2.2. Rehabilitation Program - Homes Outside 100-year Floodplain (Owner & Tenant Occupied)
2.3. Reconstruction Program – Homes Outside 100-year Floodplain (Owner-Occupied Only)
2.4. Downpayment Assistance
2.5. Temporary Relocation Assistance
3. Affordable Multi-Family Rental Recovery
3.1. New Multi-Family Housing Paired with LIHTC
4. New Construction Single Family
4.1. Infill Housing for Affordable Homes
5. Unmet Housing Needs for Vulnerable Populations

Applicants and Sub-Applicants

Missouri will use a Method of Distribution that allows Eligible Cities and Counties to apply for funds from the CDBG-DR Program. Upon receipt of CDBG-DR award, the unit of local government is the administering entity for program activities. The State will provide training and technical assistance.

Local governments may make applications "on-behalf of" eligible entities whereby the sub-applicant is provided the CDBG-DR funds for their use to carry out the agreed upon, eligible activities. This is different than a local government receiving a CDBG-DR grant and directly contracting or procuring for a service.

Eligible sub-applicants may be established and designated by choice of the local government, as a partner in a project, versus the local government procuring a contractor to deliver the work. The latter cannot be a sub-applicant and may not be "provided the CDBG-DR funds for their use."

Sub-applicants may be governmental agencies and private non-profits. Regional Planning Commissions, Councils of Government, and Community Action Agencies are examples of eligible sub-applicants.

Eligible sub-applicants may subcontract with other eligible non-profits.

Local governments may contract directly with Regional Planning Commissions and Councils of Government for grant administration of projects, if they are a dues-paying member in good standing for at least 12 months prior to application. Local governments may contract directly with Community Action Agencies for program delivery of rehabilitation or reconstruction, due to their quasi-government status. Local governments are also required to coordinate with HUD-certified housing counseling organizations to ensure that information and services are made available to both tenants and homeowners.

State Priority Application Structure

Given the complexity of the work in the categories of Rehabilitation and Reconstruction and the Voluntary Local Buyout and Acquisition Programs, along with the desire to complete a consistent and compliant HAP, the State will prioritize applications for assistance that use Community Action Agencies as sub-applicants for Rehabilitation and Reconstruction and applications that use Regional Planning Commissions and Councils of Governments for Voluntary Local Buyout and Acquisition.

Regardless of the sub-applicants or direct contractor method, housing program processes such as accepting participant applications and determining individual and household eligibility by the income verification method based on adjusted gross income; duplication of benefits review; inspection and environmental; award determination; contract and bid work (procurement); construction; and completion, will be implemented through agreements. The processes of eligibility must also include conducting inspections to determine whether the subject property was affected by the 2017 declared disaster and if the property can be repaired or must be reconstructed. The HAP Inspector develops a scope of work and estimated cost; assists clients with procuring of contractor/builder to complete construction work; oversee construction to ensure quality of work; and ensures that all applicable HUD, local, and state regulations have been followed. The HAP Inspector also authorizes payments to contractors.

80% of the available funds will be allocated to the HUD Most Impacted and Distressed areas in the following five zip codes:

63935 – Doniphan area
63965 – Van Buren area
64850 – Neosho area
65616 – Branson area
65775 – West Plains area

For all housing assistance and buyout programs, the State's housing guidelines has established housing assistance maximums and program policies and procedures. Grantees must adopt by resolution the guidelines applicable to activities carried out by the Grantee. The resolution must include the structure of their programs and processes and conform to state guidelines.

Cost Reasonableness and Cost Analysis

Local government grantees receiving CDBG-DR funds are required to follow State CDBG-DR program policies and procedures in order to assess the cost-effectiveness of residential rehabilitation or reconstruction projects relative to other alternatives by deploying a cost reasonableness test. The test must describe the method for determining when the cost of the rehabilitation or reconstruction of the unit will not be cost-effective relative to other means of assisting the property-owner, such as buyout or acquisition of the property. The policies and procedures will address controls for assuring construction costs are consistent with market cost at the time and place of construction, including a description addressing controls for housing projects involving 8 or more units. The State will require local government grantees to require construction contractors to implement cost control measures or verify that reimbursable costs are correctly controlled during the project. Standard Agreements with jurisdictions will include subrogation clauses in case of the event of non-compliance with the applicable requirements and regulations. A grantee may find it necessary to provide exceptions on a case-by-case basis to the maximum amount of assistance or cost effectiveness criteria; the State CDBG-DR program will describe the process UGLGs will use to make such exceptions in its policies and procedures. All CDBG-DR expenditures remain subject to cost principles in 2 CFR part 200, subpart E – Cost Principles, including the requirement that costs be necessary and reasonable for the performance of the grantee's CDBG-DR grant.

Duplication of Benefits Review

A duplication of benefits occurs when a disaster survivor receives financial assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. A duplication of benefits (DOB) review will be applied to all housing assistance activities. In determining an applicant's unmet need, grantees must follow the State's Duplication of Benefits policy or develop policies and procedures to prevent any duplication of benefits in accordance with the State's policy. The State will review the Grantee's duplication of benefits policy and procedures to ensure that it meets the DOB requirements of the Stafford Act. At a minimum, the process for determining any duplications will include assessing the need, identifying the total assistance available to the applicant, deducting benefits received for a different purpose, deducting funds received for the same purpose but a different eligible use, funds not available (such as insurance proceeds that were applied to a forced mortgage payoff), private loans, other personal assets. Grantees must include a subrogation agreement to be signed by every applicant for housing assistance. A subrogation agreement ensures that any benefits received by the disaster survivor after the processing of the housing assistance that may represent a duplication will be paid back.

Agreements between Grantees and Applicants for Housing Assistance Programs

Contracts

Under each of the HAP programs there is a required relationship built between the entity delivering the program at the local level and the potential beneficiaries of the program. Depending upon the type of assistance provided (buyout, rehabilitation, down payment assistance, tenant relocation assistance, etc.) there is required program paperwork, including agreements, which must be executed. For example, in the case of a buyout, all the typical paperwork required for a real estate transaction necessary to get to a closing on the property and to affect a legal transfer is also required under this program. The property will also have a deed restriction placed on it for perpetuity to prevent any further redevelopment. Contracts and legal agreements are part of every level of the Housing Assistance Program. They will occur between the State and local government, between the local government and the sub- recipient, between the sub-recipient and other professional service providers and between the sub-recipient and the beneficiary. The policies and procedures manual will outline each of the contracts and agreements used in each program transaction.

Affordability Periods

In order for the HAP funds to retain an affordable housing status, properties may have an affordability period applied as a condition of receiving the benefit. Those terms will differ depending upon the type of assistance and may range from 5 years to 20 years. Typically, the affordability period is applied to the property as part of the deed.

Accessibility Accommodations

The use of CDBG-DR 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. Guidance on relocation considerations for persons with disabilities may be found in Chapter 3 of HUD's Relocation Handbook 1378.0 (available on the HUD Exchange website at https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/13780. A checklist of accessibility requirements under the Uniform Federal Accessibility Standards (UFAS) is available at https://www.hudexchange.info/resources/documents/Ufas-Accessibility-Checklist.pdf. The HUD Deeming Notice 79 FR 29671 (May 23, 2014) explains when HUD recipients can use 2010 ADA Standards with exceptions, as an alternative to UFAS to comply with Section 504.

Fair Housing

The State of Missouri is committed to providing housing assistance programs in a manner that furthers fair housing opportunities to all residents. The State will enact planning and outreach efforts to ensure rebuilding is equitable across communities. The State will implement all regulations in accordance with the Fair Housing Act. All grantees will be required to certify that they will administer their programs in accordance with the Fair Housing Act and that the program will affirmatively further fair housing.

National Objective

Housing programs providing a direct benefit to a disaster survivor are typically required to meet a 100 percent low- and moderate-income test to meet the Low- and Moderate-Income National Objective. In the case of the CDBG- DR funds used in this program "low and moderate income" is defined as an amount at or below 120% of area median income (AMI). However, only those funds used for households with up to 80 percent of the area median income may qualify as meeting the low and moderate-income person benefit national objective used to meet the statutory requirement that 70 percent of the aggregate of CDBG-DR program funds support activities benefitting low- and moderate-income persons. The national objective of Urgent Need may be used for households with income between 80 and 120% AMI. Households above 120 percent AMI may be assisted for rehabilitation of an owner-occupied house only if the structure was covered under flood insurance at the time of the disaster. Households above 120 percent AMI may also be assisted in a voluntary buyout of an owner-occupied household located inside the floodway, 100-year floodplain, or a designated Disaster Risk Reduction Area.

Projects using CDBG-DR funds must meet on of the following HUD-designated national objectives to be an eligible housing activity:

- Benefitting Low- to Moderate-Income Persons (LMH): Low to Moderate Income Housing (LMH) provides that any assisted activity that involves the acquisition or rehabilitation of property to provide housing shall be considered to benefit persons of low-to moderate-income only to the extent such housing will, upon completion, be occupied by such persons.
- Low to Moderate Income Buyout (LMB): Benefitting low- to moderate-income persons where the award amount is greater than their post-disaster fair market value of the property
- Low to Moderate Housing Incentive (LMHI): Benefitting low- to moderate-income persons participating in the voluntary buyout or other voluntary acquisition of housing to move outside of the affected floodplain or to a lower-risk area; or when the housing incentive is for the purpose of providing or improving residential structures that, upon completion, will be occupied by an LMI household.
- Urgent Need – providing housing assistance to applicants making in excess of 80% of the area median income
- Preventing or Eliminating Slum or Blight – used for buyout or acquisition with demolition.

Housing Construction and Rehabilitation Standards

Housing Assistance programs implemented by the State will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. Construction contractors will be required to

carry required licenses and insurance coverage(s) for all work performed. Missouri will promote high quality, durable and energy efficient construction methods in affected counties. All newly constructed buildings must meet locally adopted building codes, standards and ordinances. In the absence of locally adopted and enforced building codes that are more restrictive than the state building code the requirements of the State Building Code will apply. Future property damage will be minimized by incorporating resilience standards by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations, with the minimum elevation being two feet above the base flood elevation.

The State will implement construction methods that emphasize high quality, durability, energy efficiency, sustainability, and mold resistance. All rehabilitation, reconstruction, and new construction will be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigation against the impact of future disasters.

Under the CDBG-DR Program, the State will require all new construction for residential buildings and all replacement of substantially damaged residential buildings meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- ENERGY STAR (Certified Homes or Multifamily High Rise)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development)
- ICC 700 National Green Building Standard
- EPA Indoor AirPlus (ENERGY STAR a prerequisite)
- Any other equivalent comprehensive green building program acceptable to HUD.

For rehabilitation other than substantially damaged residential buildings, grantees must follow the guidelines specified in the HUD CPD Green Building Retrofit Checklist. Grantees must apply these guidelines to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall.

All developments must, at a minimum, comply with the HUD Section 8 Existing Housing Quality Standards (HQS). The primary objective of these standards is to protect the tenant(s) by guaranteeing a basic level of acceptable housing. The goal is to provide "decent, safe and sanitary" housing at an affordable cost to lower income families. Beyond these minimum standards, the program encourages housing of the same quality and amenities as market rate housing within the same market area. Developments/Shelters must also meet local codes, ordinances, zoning laws and federal regulations.

Construction Warranties

In addition to the licenses and insurance requirements, Contractors will be required to provide a warranty period for all work performed. Assisted homeowners will be provided a warranty on the work performed and funded through the housing programs. Contractors will be required to guarantee 1 year of general warranty for the entire home, 2 years of electrical, delivery, and mechanical system warranty, and 10 years of structural warranty. Applicants will have access to a thorough appeals process to address any construction quality concerns identified by the homeowner during the construction process.

Appeals Process

The State will implement an appeals process for homeowners, rental property owners, and other program participants related to program eligibility and program application process. In addition, the state will implement an appeals process for the Housing Assistance programs to allow for appeals of rehabilitation and new construction contractor work not meeting established contractor standards and workmanship that will be detailed in the policies and procedures manual. This protocol will include details on the appeals process, appealable decisions, review criteria, as well as development of governance mechanisms as part of the program operations and guidelines. Upon the approval of this Action Plan and the implementation of any such activity, the appeals process specific to such activity will be announced and placed on the Missouri Disaster Recovery webpage.

1 - Voluntary Local Buyout and Acquisition

Residential Buyout Program

Program eligible activities include acquisition of residential real property conducted through a local voluntary buyout, clearance and demolition. Relocation Assistance is available to households with less than 120 percent Area Median Income.

The term ''buyout'' as referenced in this policy refers to acquisition of properties located in a floodway and floodplain that is intended to reduce risk from future flooding and the acquisition of properties in Disaster Risk Reduction Areas as designated by the grantee. The key factor in determining whether the acquisition is a buyout is whether the intent of the purchase is to reduce risk of property damage in a floodplain or a Disaster Risk Reduction Area.

Recent flooding events have caused significant damage to areas outside of the 100-year floodplain. These areas may be determined to be a Disaster Risk Reduction Area. Grantees will need to establish criteria to designate a Disaster Risk Reduction Area, subject to the following requirements: the hazard must have been caused or exacerbated by the Presidentially declared disaster for which the grantee received its CDBG-DR allocation; the hazard must be a predictable environmental threat to the safety and well- being of program beneficiaries, as evidenced by the best available data and science; and the Disaster Risk Reduction Area must be clearly delineated so that HUD and the public may easily determine which properties are located within the Disaster Risk Reduction Area. All property acquired, accepted, or from which a structure will be removed pursuant to the project will be dedicated and maintained in perpetuity, with a deed restriction or covenant running with the property, for a use that is compatible with open space, recreational, or floodplain and wetlands management practices. The guidelines associated with buyouts, will be developed in accordance with CDBG-DR requirements and regulation to set maximum assistance amounts that may be more restrictive than the state's maximums, target area locations, and additional eligibility requirements.

The buyout program combines the acquisition of properties with relocation assistance that results in occupancy and meets the LMHI national objective for LMI persons. This includes additional assistance to rental property owners to provide affordable replacement rental properties outside of the floodplain. Affordability rental periods apply. Non-LMI persons can be assisted with buyout under the Urgent Need national objective. The purchased property, either existing home or newly constructed home, must be located outside of the 100-year floodplain, and outside the Disaster Risk Reduction Area, within the grantee's jurisdiction and be comparable to the participant's previous property. For relocation assistance, the amount of assistance is based on the determined need of the participant; the amount will not exceed $50,000.

The State will accept proposals for CDBG-DR funds from eligible applicants, UGLGs, for primary residential properties, but priority will be given to low-to moderate-income residents and vulnerable populations as defined by HUD:

- Owner-Occupied Single-Family Homes
- Single Family Rental Units
- Multi-Family Housing Units

Buyout projects will be funded under the following circumstances:

- Buyouts proposing CDBG-DR funding to assist in meeting the required match for FEMA funding (up to 25% of eligible buyout costs).
- Buyouts for which FEMA funding is not eligible or not available. CDBG-DR funds may be awarded for up to 100% of the anticipated project budget.

At a minimum, the Residential Buyout program guidelines will include the following criteria:

- Application for assistance must present a direct or indirect connection to the disaster.
- CDBG-DR funds are prohibited from being used for activities reimbursable by or for which funds are made available by the Federal Emergency Management Agency (FEMA).

- All property acquired, accepted, or from which a structure will be removed pursuant to the project will be dedicated and maintained in perpetuity, with a deed restriction or covenant running with the property, for a use that is compatible with open space, recreational, or floodplain and wetlands management practices.

Relocation Assistance Program

In a voluntary buyout, the property will be acquired at the pre-flood fair market value established by the appraisal, less any duplication of benefits. If the homeowner chooses to apply buyout proceeds for relocating within the same community, they are eligible for relocation assistance, not to exceed $50,000, to be applied to the purchase of an existing home. If a comparable home is unavailable within the affordable housing stock, new construction is an option. If the owner is moving outside of the community or is not purchasing a replacement home, the relocation payment is not available.

Tenant Relocation Assistance

Tenants who are affected by a voluntary buyout will be provided relocation assistance under the procedures of the Uniform Relocation Assistance and Real Property Acquisition Act, as amended at 49 CFR 24.

- Relocation assistance payment not to exceed $7,200. Such payment shall be 42 times the amount obtained by subtracting the base monthly rental for the displacement dwelling from the lesser of the monthly rent and estimated average monthly cost of utilities for a comparable replacement.
- Moving costs
- The Relocation Expense Benefit may be used to purchase replacement site or dwelling

2 - Homeownership Assistance and Tenant Assistance

Grantees must consider all possible housing options for each applicant and select the most cost-effective option. For properties that are located inside the floodway, inside the 100-year floodplain, or inside a designated Disaster Risk Reduction Area, the most cost-effective option is likely a buyout. Homes in the floodway, inside the 100-year floodplain, and Disaster Risk Reduction Areas that are substantially damaged are subject to elevation requirements (2 feet above base flood elevation). The elevation requirement may prove rehabilitation of substantially damaged homes infeasible. Elevation requirements are mandated for reconstruction, making reconstruction not cost-effective when compared to the buyout with housing incentive program, as described in the buyout section. Buyout is conducted with the intent to reduce risk of future property damage. Properties are deed restricted and there will be no subsequent application for disaster assistance for any purpose. Households are then relocated to a lower risk area outside the 100-year floodplain. The goal of buyout is to reduce or eliminate the risk of future harm to persons and prevent repetitive damage to property. For this reason, CDBG-DR funds will not be used for reconstruction inside floodways, inside the 100-year floodplain, or inside a designated Disaster Risk Reduction Area.

For properties outside the 100-year floodplain and Disaster Risk Reduction Area, disaster damaged properties should first be considered for rehabilitation. If the property damage is significant (greater than 80% of the county assessor's appraised value), then reconstruction should be considered. If reconstruction is not feasible or cost-effective, consider the option of purchasing an existing comparable residential structure. If there are none available, new construction is an option.

Grantees are required to coordinate with HUD-certified housing counseling organizations to ensure that information and services are made available to both tenants and homeowners.

Housing Rehabilitation Inside the 100-Year Floodplain

Owner-occupied properties inside the 100-year floodplain, or designated Disaster Risk Reduction Area, will be eligible for rehabilitation when meeting the following criteria:

- Homes covered by flood insurance at the time of the disaster and there are still unmet recovery needs; or
- Household income meets less than 120% of the AMI and there are still unmet recovery needs.

- Program maximum is $40,000 per household. The rehabilitation estimate must include meeting Green Building Standards, as well as resiliency solutions that address threats and hazards to the area. Resiliency solutions may include elevating the first floor of the habitable area; reinforced roofs; storm shutters; and mold and mildew resistant products Grantees are encouraged to incorporate Resilient Home Construction Standards, meaning all construction meets an industry recognized standard, such as those set by Fortified Home.

Elevation Requirement
Homes that receive assistance for repair of substantial damage or substantial improvement must be elevated with the lowest floor, including the basement, at least 2 feet above the base flood elevation.

Flood Insurance Requirement

- A HUD- assisted homeowner of a property located inside the 100-year floodplain must obtain and maintain flood insurance.
- HUD strongly recommends the purchase of flood insurance outside the 100-year floodplain for properties that have been damaged by a flood.
- Assistance may only be provided for the rehabilitation of a household located in a floodplain if:
    - The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs; or
    - The household earns less than the greater of 120% AMI (Area Median Income) or the national median and has unmet recovery needs.

The procedures will detail the requirements for a community to become a National Flood Insurance Program (NFIP) participant and include guidance for purchasing flood insurance post disaster.

Rehabilitated homes inside the 100- year floodplain must be insured under a policy of flood insurance in the amount of the lessor of either the full insurable value of the structure as determined by the applicable property insurer, or the maximum amount available for the structure under the National Flood Insurance Program. The full insurable value of the structure will be based upon the program's final total project cost for the applicant. Failure to maintain flood insurance will result in an applicant's property to be ineligible for future disaster relief. Upon the sale or transfer of the property, applicants will, on or before the date of transfer, notify all transferees in writing of the continuing obligation to maintain flood insurance on the property, and include the requirement on all documents and deeds.

Evidence that the damaged home is covered by the required flood insurance amount must be provided during the applicant intake process. Before the grant is closed, the applicant must provide evidence of flood insurance. A declaration sheet, a form describing the coverage from the applicant's insurance company, or an application for flood insurance along with a paid receipt from the applicant's insurance company is sufficient evidence to satisfy this requirement.

Residential Structures Inside a Floodway, or Inside 100-year Floodplain				
Circumstance	Owner Had Flood Insurance at Time of Disaster	Household Meets LMI at Less Than 120% of AMI or National Median Income	Eligible for Rehabilitation *(No Reconstruction Allowed Inside Floodway or 100-Year Floodplain)*	Other Consideration
Damaged homeowner household is in a floodway	N/A	Yes	No	Conduct Buyout
Damaged homeowner household is in a floodway	N/A	No	No	Conduct Buyout using Urgent Need national objective

Damaged homeowner household is inside 100-year floodplain	No	Yes	Yes	LMI is defined as less than 120% of Area Median Income or the national median income
Damaged homeowner household is inside 100-year floodplain, or Disaster Risk Reduction Area	No	No	No	Conduct Buyout using Urgent Need national objective
Damaged homeowner household is inside 100-year floodplain	Yes	Yes	Yes	LMI is defined as less than 120% of Area Median Income or the national median income
Damaged homeowner household inside 100-year floodplain	Yes	No	Yes	Must use Urgent Need national objective
Damaged affordable rents – rental unit(s) inside 100-year floodplain	N/A	N/A	No	May be eligible to be relocated outside of the 100-year floodplain

Housing / Rental Rehabilitation and Housing Reconstruction Outside the 100-Year Floodplain

Owner-occupied and rental residential properties outside the 100-year floodplain will be eligible for rehabilitation and reconstruction.

- Program maximum for Rehabilitation: $40,000 per household.
- The rehabilitation estimate must include meeting Green Building Standards.
- Program maximum for Reconstruction: $100,000 per household.
- Property owners of rental units must provide affordable rents for affordability period.

Houses and Rentals Outside the 100-year Floodplain				
Circumstance	Owner had flood insurance at time of disaster	Household meets LMI at less than 120% of AMI or national median income	Eligible for rehab or reconstruction	Other Consideration
Damaged homeowner household is outside 100-year floodplain	Yes	No	No	
Damaged homeowner household is outside 100-year floodplain	No	Yes	Yes	
Damaged homeowner household is outside 100-year floodplain	No	No	No	
Damaged homeowner household is outside 100-year floodplain	Yes	Yes	Yes	
Affordable Rental Unit(s) is outside 100-year floodplain	N/A	N/A	Yes	Owner or Rental Property must provide fair market rents (affordable rents) for affordability period

Temporary Relocation Assistance

During any rehabilitation or reconstruction related to the previous sections, it may be necessary for tenants or owner-occupants to relocate temporarily. Temporary relocation should not extend beyond one year before the person(s) is returned to their home. Any person who has been temporarily relocated for more than one year must be offered all permanent relocation assistance which may not be reduced by the amount of any temporary relocation assistance previously provided.

Downpayment Assistance

A low-to-moderate income person wishing to buy into affordable replacement stock outside of a floodplain or disaster risk reduction area, within the grantee's jurisdiction may be eligible for down payment assistance. The maximum allowed is up to 25 percent of the total cost of the single family home, plus closing costs. The allowable maximum of 25% of the total house purchase price cannot exceed 100% of the total down payment. Qualified LMI households, under 120% AMI, are eligible to participate and must be able to secure a mortgage. Each potential buyer should be advised on the credit requirements needed to buy a home.`

3 - Affordable Rental Recovery

Multi-Family Housing with Low Income Housing Tax Credits (LIHTC)

Provides funding for rehabilitation, reconstruction and new construction of affordable multi-family rental housing units in areas impacted by the flooding event.

Local governments may propose multi-family rental housing developments in conjunction with for-profit and non-profit developers proposing to receive Low Income Housing Tax Credits (LIHTC) through MHDC. The developments must be affordable or mixed income, and not market rate housing developments.

Affordable developments are all occupied by LMI households; mixed income is occupied by at least 51% LMI households.

To meet the low- and moderate-income housing national objective, affordable rental housing funded under CDBG-DR must be rented to a low- and moderate-income persons at affordable rents. Grantees are required to impose the following minimum affordability periods enforced with recorded use restrictions, covenants, deed restrictions, or other mechanisms to ensure that rental housing remains affordable for the required period of time:

- Rehabilitation or reconstruction of multi-family rental projects with eight or more units – 15 years minimum period of affordability
- Rehabilitation or reconstruction of multi-family rental projects with less than eight units – 5 years minimum period of affordability
- New construction multi-family rental projects with five or more units – 20 years minimum period of affordability
- New construction multi-family rental projects with less than five units – 5 years minimum period of affordability
- All new construction for residential buildings and all replacement of substantially damaged residential buildings meet an industry-recognized standard that has achieved certification under at least one of the following programs:
    - ENERGY STAR (Certified Homes or Multifamily High Rise)
    - Enterprise Green Communities
    - LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development)
    - ICC 700 National Green Building Standard
    - EPA Indoor AirPlus (ENERGY STAR a prerequisite)
    - Any other equivalent comprehensive green building program acceptable to HUD
- For rehabilitation other than substantially damaged residential buildings, grantees must follow the guidelines specified in the HUD CPD Green Building Retrofit Checklist. Grantees must apply these guidelines to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall.

Any substantial rehabilitation or new construction of a building with more than four rental units must include installation of broadband infrastructure, except where the grantee documents that the location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible.

CDBG-DR funds can be used to support infrastructure for multi-family housing.

4- New Construction – Replacement of Affordable Housing Stock

Communities may face needs for restoring and improving the housing stock. New construction infill is the construction of single-family homes on vacant lots within existing neighborhoods. This approach is used to create more affordable housing, while promoting community revitalization. Alternative requirements (Vol 83, No. 28 FR 5844, February 9, 2018) are adopted to the extent necessary to permit new housing construction, and to require construction standards on structures constructed or rehabilitated with CDBG-DR funds as part of activities eligible under 42 U.S.C. 5305(a.)

Infill new construction involves matching land, a purchaser and a builder with acquisition and construction financing and permanent mortgages. This process may include an interested developer purchasing sites in the community. CDBG-DR funds are eligible to fund up to 25% of the construction loan, made available to low-to-income persons who qualify for a loan. The construction loan converts to an affordable mortgage. Potential buyers may or may not have been displaced by the 2017 Storm and Flooding event. Each potential buyer should be advised on the credit requirements needed to buy a

home. Credit counseling will be provided through a HUD-certified housing counselor. Closing costs will be paid by the program.

A second option would be for the CDBG-DR funds to be used for downpayment assistance upon completion of construction. A low-to-moderate income person wishing to buy into affordable replacement stock outside of a floodplain or disaster risk reduction area, within the grantee's jurisdiction may be eligible for down payment assistance. The maximum allowed is up to 25 percent of the total cost of the single family home, plus closing costs. The allowable maximum of 25% of the total house purchase price cannot exceed 100% of the total down payment. Qualified LMI households, under 120% AMI, are eligible to participate and must be able to secure a mortgage. Each potential buyer should be advised on the credit requirements needed to buy a home.

Credit counseling will be provided through a HUD-certified housing counselor.

Green Building Standards are required for all new construction of residential buildings and all replacement of substantially damaged residential buildings. In addition, HUD has strongly encouraged for CDBG-DR recipients to incorporate a Resilient Home Construction Standard. The Housing Assistance Program policies and procedures will include further details for these standards along with Quality Construction Standards.

Affordability Period

Affordability Period for New Construction of Single-Family LMI Homeowner Housing. Grantees receiving CDBG-DR funds are required to implement a minimum five-year affordability period on all newly constructed single-family housing that is to be made available for low- and moderate-income homeownership. This requirement for an affordability period does not apply to the rehabilitation or reconstruction of single-family housing.

The State will develop and impose recapture affordability restrictions for single-family housing newly constructed with CDBG–DR funds and made available for affordable homeownership to low- and moderate-income persons, and to enforce those recapture restrictions through recorded deed restrictions, covenants, or other similar mechanisms, for a period not less than five years. The State shall establish recapture requirements for housing funded and shall outline those requirements. The recapture provisions will clearly describe the terms of the recapture provisions, the specific circumstances under which these provisions will be used, and how the provisions will be enforced.

5 - Unmet Housing Needs for Vulnerable Populations

Vulnerable Populations – Homeless Assistance

Purpose

It is the purpose of these funds to serve the greatest housing and housing service needs in areas of the state most impacted by disaster. Attention is given to the lowest-income, vulnerable residents in the areas where housing needs exist. These funding components allow the state's limited resources to be dedicated to services that best serve the population in greatest need.

Eligible Applicants

City and County local governments located within the 55 counties declared for the disaster. Preference for any limited funds will be provided to communities within the 5 most impacted zip codes defined by HUD.

Eligible Sub-applicants

Experienced and established non-profit homeless service providers that have the capacity to expand their existing services to address the unmet need.

Eligible Activities/Uses of Funds

Case Management provides the full spectrum of case management services to help individuals gain access to jobs, housing and associated services.

Eligible costs: Funds may be used to support the cost of connecting individuals with services such as job training, legal aid, credit counseling and other supportive services to support housing choice. Payments are made directly to the provider of such services on behalf of an individual or family.

1. Rapid Rehousing

Funds may be used to provide housing relocation and stabilization services, short- and/or medium-term rental assistance, and engagement services as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Assistance may be provided to eligible program participants that meet a HUD definition of homeless.

Eligible Costs: Funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate housing facility. Funds may also be used for the costs of providing short-and/ or medium-term rental & utility assistance, essential services and case management to individuals and families who are in emergency shelter. Payments are made directly to the provider of such services on behalf of an individual or family.

Waiver: A waiver from HUD may be necessary to provide any rental or utility assistance beyond the 3 months currently allowed under the CDBG program.

2. Construction /Rehabilitation of Public Facilities

Funds may be used by organizations for payment of costs of new construction or modification, expansion, or rehabilitation of existing housing facilities that are targeted to homeless individuals or families (including but not limited to emergency shelters, transitional housing, or acquisition of rental housing or construction or rehabilitation of rental housing).

Eligible costs: Funds may be used for payment of labor, materials, tools, and other costs for renovation or construction (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter or other appropriate housing).

Cap on Funds Requested

Applicants may not request funds in excess of $750,000, and no more than twenty-five percent of the request may be used for Rapid Rehousing services. Funding requests for Rapid Rehousing services only may not exceed $200,000 per grantee. Funding requests for Case Management services only must coordinate efforts with FEMA Case Managers and may not exceed $50,000 per grantee.

Continuum of Care (CoC) Coordination

Applicants should align themselves with the priorities and Coordinated Entry systems of its Continuum of Care. A letter of support from the governing body of its CoC must be obtained. Contact information for MO CoCs can be found at http://www.endhomelessnessmo.org

Public Housing Unmet Needs

Various target populations are eligible to be served, including homeless, special needs, and other vulnerable populations. CDBG-DR funds received by the state will be used in the recovery efforts for specific disaster-related purposes. The DED Housing Assistance Program, in coordination with grantees, will identify opportunities for public housing, affordable housing and housing for vulnerable populations and address the rehabilitation, reconstruction, and replacement of the following types of housing affected by the disasters:

- Public housing (including administrative offices);
- HUD-assisted housing, affordable housing;
- Prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless;

- 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;
- McKinney-Vento Homeless Assistance Act funded shelters and housing for the homeless and at-risk- for-homelessness, including emergency shelters and transitional and permanent housing for the homeless; and private market units receiving project-based assistance, or with tenants that participate in the Section 8 Housing Choice Voucher Program.

Complaint/Appeal Process

The State and its grantees are responsible for responding to complaints and appeals in a timely manner. The State will develop a grievance procedure that all grantees will be required to adopt and implement in a uniform and consistent manner. The process for requesting a review of a program decision and for filing a formal appeal is found on the CDBG-DR (Disaster Recovery) website

Waivers from Federal Register

CDBG-DR is a special appropriation intended to respond to Presidentially Declared Disasters. CDBG-DR is different from the regular CDBG that states and approximately 1,200 cities and counties receive each year. In general, CDBG-DR follows the regular State CDBG program's legal and regulatory provisions.

However, HUD is allowed to waive or modify regular CDBG provisions in order to enable the funds to be used in ways more appropriate to disaster recovery. Each Federal Register notice is tailored to each disaster and sets out the provisions grantees must follow when seeking and using CDBG-DR funds. The following waivers and alternative requirements are listed in the Federal Registers applicable to the state's allocation. Federal Register 83 FR 5844 published February 9, 2018, and 83 FR 40314 published August 14, 2018 are applicable to the CDBG-DR funding provided for the federally declared disaster DR-4317.

Displacement of Persons and/or Entities. To minimize the displacement of persons and/or entities that may be affected by the activities outlined in this Action Plan, the DED will coordinate with other state agencies, local governments, and local non-profit organizations to ensure minimal displacement. However, should any proposed projects cause the displacement of people, the DED will ensure that grantees follow the requirements set forth under the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as waived.

Relocation Assistance. The relocation assistance requirements at section 104(d)(2)(A) of the HCD Act and 24 CFR 42.350 are waived to the extent that they differ from the requirements of the URA and implementing regulations at 49 CFR part 24, as modified by this notice, for activities related to disaster recovery. Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation). Both FEMA and CDBG funds are subject to the requirements of the URA; however, CDBG funds are subject to section 104(d), while FEMA funds are not. The URA provides at 49 CFR 24.402(b) that a displaced person is eligible to receive a rental assistance payment that is calculated to cover a period of 42 months. By contrast, section 104(d) allows a lower- income displaced person to choose between the URA rental assistance payment and a rental assistance payment calculated over a period of 60 months. This waiver of the section 104(d) relocation assistance requirements assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under this notice.

Tenant-Based Rental Assistance. The requirements of sections 204 and 205 of the URA, and 49 CFR 24.2(a)(6)(vii), 24.2(a)(6)(ix), and 24.402(b) are waived to the extent necessary to permit a grantee to meet all or a portion of a grantee's replacement housing payment obligation to a displaced tenant by offering rental housing through a tenant based rental assistance (TBRA) housing program subsidy (e.g., Section 8 rental voucher or certificate), provided that comparable replacement dwellings are made available to the tenant in accordance with 49 CFR 24.204(a) where the owner is willing to participate in the TBRA program, and the period of authorized assistance is at least 42 months. Failure to grant this waiver

would impede disaster recovery whenever TBRA program subsidies are available but funds for cash replacement housing payments are limited and such payments are required by the URA to be based on a 42-month term.

Arm's Length Voluntary Purchase. The requirements at 49 CFR 24.101(b)(2)(i) and (ii) are waived to the extent that they apply to an arm's length voluntary purchase carried out by a person who uses funds allocated under this notice and does not have the power of eminent domain, in connection with the purchase and occupancy of a principal residence by that person. Given the often-large-scale acquisition needs of grantees, this waiver is necessary to reduce burdensome administrative requirements following a disaster. Grantees are reminded that tenants occupying real property acquired through voluntary purchase may be eligible for relocation assistance.

Optional Relocation Policies. The regulation at 24 CFR 570.606(d) is waived to the extent that it requires optional relocation policies to be established at the grantee level. Unlike the regular CDBG program, States may carry out disaster recovery activities directly or through grantees, but 24

CFR 570.606(d) does not account for this distinction. This waiver makes clear that grantees receiving CDBG–DR funds under this notice may establish optional relocation policies or permit their sub- recipients to establish separate optional relocation policies. This waiver is intended to provide States with maximum flexibility in developing optional relocation policies with CDBG–DR funds.

Waiver of Section 414 of the Stafford Act. Section 414 of the Stafford Act (42 U.S.C. 5181) provides that ''Notwithstanding any other provision of law, no person otherwise eligible for any kind of replacement housing payment under the Uniform Relocation Assistance and Real Property

Acquisition Policies Act of 1970 (Pub. L. 91–646) [42 U.S.C. 4601 et seq.] [''URA''] shall be denied such eligibility as a result of his being unable, because of a major disaster as determined by the President, to meet the occupancy requirements set by [the URA]''. Accordingly, homeowner occupants and tenants displaced from their homes as a result of the identified disaster and who would have otherwise been displaced as a direct result of any acquisition, rehabilitation, or demolition of real property for a federally funded program or project may become eligible for a replacement housing payment notwithstanding their inability to meet occupancy requirements prescribed in the URA. Section 414 of the Stafford Act (including its implementing regulation at 49 CFR 24.403(d)(1)), is waived to the extent that it would apply to real property acquisition, rehabilitation or demolition of real property for a CDBG–DR funded project commencing more than one year after the Presidentially declared disaster undertaken by the grantees, or grantees, provided that the project was not planned, approved, or otherwise underway prior to the disaster. For purposes of this paragraph, a CDBG-DR funded project shall be determined to have commenced on the earliest of: (1) The date of an approved Request for Release of Funds and certification, or (2) the date of completion of the site-specific review when a program utilizes Tiering, or (3)the date of sign-off by the approving official when a project converts to exempt under 24 CFR 58.34(a)(12). The Department has surveyed other federal agencies' interpretation and implementation of Section 414 and found varying views and strategies for long-term, post-disaster projects involving the acquisition, rehabilitation, or demolition of disaster-damaged housing. The Secretary has the authority to waive provisions of the Stafford Act and its implementing regulations that the Secretary administers in connection with the obligation of funds made available by this notice, or the grantees' use of these funds. The Department has determined that good cause exists for a waiver and that such waiver is not inconsistent with the overall purposes of title I of the HCD Act.

(1)The waiver will simplify the administration of the disaster recovery process and reduce the administrative burden associated with the implementation of Stafford Act Section414 requirements for projects commencing more than one year after the date of the Presidentially declared disaster considering the majority of such persons displaced by the disaster will have returned to their dwellings or found another place of permanent residence.

(2)This waiver does not apply with respect to persons that meet the occupancy requirements to receive a replacement housing payment under the URA nor does it apply to persons displaced or relocated temporarily by other HUD-funded

programs or projects. Such persons' eligibility for relocation assistance and payments under the URA is not impacted by this waiver.

Housing and Related Floodplain Issues

Housing-Related Eligibility Waivers. The broadening of eligible activities under the HCD Act is necessary following major disasters in which large numbers of affordable housing units have been damaged or destroyed, as is the case of the disasters eligible under this notice. Therefore, 42 U.S.C. 5305(a)(24)(A) and (D) is waived to the extent necessary to allow: (1) Homeownership assistance for households earning up to 120 percent of the area median income; and (2) down payment assistance for up to 100 percent of the down payment. While homeownership assistance may be provided to households earning up to 120 percent of the area median income, only those funds used for households up to 80 percent of the area median income may qualify as meeting the low and moderate-income person benefit national objective. In addition, 42 U.S.C. 5305(a) and 24 CFR 570.207(b)(3) is waived and alternative requirements adopted to the extent necessary to permit new housing construction, and to require the following construction standards on structures constructed or rehabilitated with CDBG–DR funds as part of activities eligible under 42 U.S.C. 5305(a). All references to ''substantial damage'' and ''substantial improvement'' shall be as defined in 44 CFR 59.1 unless otherwise noted.

a. Green Building Standard for Replacement and New Construction of Residential Housing. Grantees must meet the Green Building Standard in this subparagraph for: (i) All new construction of residential buildings and (ii) all replacement of substantially damaged residential buildings. Replacement of residential buildings may include reconstruction (i.e., demolishing and rebuilding a housing unit on the same lot in substantially the same manner) and may include changes to structural elements such as flooring systems, columns, or load bearing interior or exterior walls.
b. Meaning of Green Building Standard. For purposes of this notice (identify the FR), the Green Building Standard means the grantee will require that all construction covered by subparagraph a, above, meet an industry-recognized standard that has achieved certification under at least one of the following programs: (i) ENERGY STAR (Certified Homes or Multifamily High-Rise), (ii) Enterprise Green Communities, (iii) LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development), (iv) ICC– 700 National Green Building Standard, (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite), or (vi) any other equivalent comprehensive green building program acceptable to HUD. Grantees must identify which Green Building Standard will be used in the program policies and procedures.
c. Standards for Rehabilitation of Non-Substantially Damaged Residential Buildings. For rehabilitation other than that described in subparagraph a, above, grantees must follow the guidelines specified in the HUD CPD Green Building Retrofit Checklist, available at https://www.hudexchange.info/resource/3684/guidance-on-the-cpd-green-building-checklist/. Grantees must apply these guidelines to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)- designated products and appliances. For example, if the furnace, air conditioner, windows, and appliances are replaced, the replacements must be ENERGY STAR- labeled or FEMP-designated products; WaterSense-labeled products (e.g., faucets, toilets, showerheads) must be used when water products are replaced. Rehabilitated housing may also implement measures recommended in a Physical Condition Assessment (PCA) or Green Physical Needs Assessment (GPNA).
d. Implementation of Green Building Standards. For construction projects completed, underway, or under contract prior to the date that assistance is approved for the project, the grantee is encouraged to apply the applicable standards to the extent feasible, but the Green Building Standard is not required. For specific required equipment or materials for which an ENERGY STAR- or WaterSense-labeled or FEMP- designated product does not exist, the requirement to use such products does not apply.

e. Elevation Standards for New Construction, Repair of Substantial Damage, or Substantial Improvement. The following elevation standards apply to new construction, repair of substantial damage, or substantial improvement of structures located in an area delineated as a flood hazard area or equivalent in FEMA's data source identified in 24 CFR 55.2(b)(1). All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 100-year (or 1 percent annual chance) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b) (10), must be elevated with the lowest floor, including the basement, at least two feet above the base flood elevation. Mixed-use structures with no dwelling units and no residents below two feet above base flood elevation, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above base flood elevation. Please note that grantees should review the UFAS accessibility checklist available at: https://www.hudexchange.info/resource/796/ufasaccessibilitychecklist/ and the HUD Deeming Notice, 79 FR 29671 (May 23, 2014) to ensure that these structures comply with accessibility requirements. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an ''activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.'' For example, critical actions include hospitals, nursing homes, police stations, fire stations and principal utility lines. Applicable State, local, and tribal codes and standards for floodplain management that exceed these requirements, including elevation, setbacks, and cumulative substantial damage requirements, must be followed.

f. Broadband Infrastructure in Housing. Any substantial rehabilitation, as defined by 24 CFR 5.100, or new construction of a building with more than four rental units must include installation of broadband infrastructure, except where the grantee documents that: (a) The location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible; (b) the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or (c) the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

g. Resilient Home Construction Standard. Grantees are strongly encouraged to incorporate a Resilient Home Construction Standard, meaning that all construction covered by subparagraph (a) meet an industry recognized standard such as those set by the FORTIFIED HomeTM Gold level for new construction of single- family, detached homes; and FORTIFIED HomeTM Silver level for reconstruction of the roof, windows and doors; or FORTIFIED HomeTM Bronze level for repair or reconstruction of the roof; or any other equivalent comprehensive resilient or disaster resistant building program. Further, grantees are strongly encouraged to meet the FORTIFIED HomeTM Bronze level standard for roof repair or reconstruction, for all construction covered under subparagraph c. FORTIFIED HomeTM is a risk-reduction program providing construction standards for new homes and retrofit standards for existing homes, which will increase a home's resilience to natural hazards, including high wind, hail, and tropical storms. Insurers can provide discounts for homeowner's insurance for properties certified as FORTIFIED. Grantees should advise property owners to contact their insurance agent for current information on what discounts may be available. More information is also available at: https://disastersafety.org/fortified/fortifiedhome/.

Minimizing Displacement Strategies

The use of CDBG-DR funded activities will be designed to minimize displacement. In accordance with the Housing and Community Development Act of 1974, as amended, (HCDA), and US Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and 570.440 (1), use of Community Development Block Grant Disaster Recovery (CDBG-DR) funds must minimize adverse impacts on persons of low and moderate-income persons.

Since the purpose of a voluntary buyout of property following a disaster is to move persons and families from harm's way, to prevent repetitive damage, and to mitigate future loss, the State will apply the URA and its standards to the buyout and housing programs implemented by the Missouri program in a manner which ensures that equitable relocation treatment is available to all persons. The program described in this Action Plan outlines the benefits provided to owners and tenants of properties entering the Voluntary Buyout Program.

As such, displaced renters may access 42 months of rental assistance. Temporary rental assistance will be made available to persons displaced as a result of a rehabilitation of a flood damaged property.

Waivers

- For the purpose of promoting the availability of decent, safe, and sanitary housing, HUD waived the following URA and section 104(d) requirements with respect to the use of CDBG-DR funds, as applicable:
- Tenant-based Rental Assistance: The requirements of sections 204 and 205 of the URA, and 49 CFR 24.2(a))(6)(vii), 24.2(a)(6)(ix), and 24.402(b) are waived to the extent necessary to meet all or a portion of replacement housing payment obligations to a displaced tenant by offering rental housing through a tenant-based based rental assistance (TBRA) housing program subsidy, (e.g., Section 8 rental voucher or certificate), provided that comparable replacement dwellings are made available to the tenant in accordance with 49 CFR 24.204(a) where the owner is willing to participate in the TBRA program, and the period of authorized assistance is at least 42 months. Households may be denied URA assistance as a result of being unable, because of a major disaster as determined by the President, to meet the occupancy requirements set by the URA.
- One-for-one replacement: Requirements at section 104(d)(2)(A)(i) and (ii) and (d)(3) of the HCD Act and 24 CFR 42.375 regarding one-for-one replacement are waived in connection with funds allocated under this notice for lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation. This waiver exempts disaster-damaged units that meet are ``not suitable for rehabilitation'', defined by the Missouri CDBG-DR Program as those units for which the cost of rehabilitation, including clear consideration for resolving issues affecting health and safety, exceeds the cap allowed for the project type.
- FEMA and CDBG rental assistance disparity: For the purpose of uniform and equitable treatment between FEMA and CDBG funds, the relocation assistance requirements at section 104(d)(2)(A) of the HCDA are waived to the extent that they differ from the requirements of the URA and implementing regulations at 49 CFR part 24, as modified under the allocation notice for these funds.
- Housing incentive payments: 42 USC 5305(a) and associated regulations are waived to the extent necessary to allow the provision of housing incentives as appropriate for the purpose of relocation to a suitable housing development or an area promoted by the community's adopted recovery plan.
- Occupancy requirement: Homeowner occupants and tenants displaced from their homes as a result of the identified disasters and who would have otherwise been displaced as a direct result of any acquisition, rehabilitation, or demolition of real property for a federally funded program or project may become eligible for a replacement housing payment notwithstanding their inability to meet occupancy requirements prescribed in the URA. To the extent that it would apply to real property acquisition, rehabilitation or demolition of real property for a project commencing more than a year after the Presidentially declared disaster, Section 414 of the Stafford Act and implementing regulation at 49 CFR 24.403(d)(1) are waived, provided that the project was not planned, approved or otherwise underway prior to the disaster. See exception for persons meeting occupancy requirements and/or displaced due to other HUD-funded projects at 83 FR 5859.
- Optional relocation policies: The requirement that optional relocation policies be established at the grantee level for households which do not meet the URA definition of "displaced person" under 24 CFR 570.606(d) is waived (83 FR 5858). However, at the discretion of the State, subrecipients may adopt optional relocation assistance policies for providing minimal levels of assistance. See the Missouri CDBG-DR Program approved Housing Guidelines for more

information on optional relocation assistance and cap. This waiver is intended to provide States with maximum flexibility in developing optional relocation policies with CDBG-DR funds.

Policy

Low-income households permanently displaced as a result of CDBG-DR activities will be provided with relocation assistance under the HCDA and URA. Those households that are displaced but not low-income may be provided relocation assistance as needed, within the limitations of the allocation and to the extent that it is allowed as per the URA and implementing regulations at 49 CFR Part 24.

Relocation Assistance

A displaced person may choose to receive advisory services, reasonable moving expenses and security deposits and credit checks, interim living costs for actual reasonable out-of-pocket costs incurred in connection with the displacement including moving expenses, and replacement housing assistance as described above and in the Missouri CDBG-DR Program Housing Guidelines.

Minimizing Displacement

The following steps will be taken, where applicable, to minimize direct and indirect displacement of persons from their homes. Applicability of items on this checklist is dependent upon the project objectives and related feasibility of each action.

1. Coordinate code enforcement with rehabilitation and housing assistance programs.
2. Evaluate housing codes and rehabilitation standards in subrecipients' project areas to prevent undue financial burden on established owners and tenants.
3. Adopt policies which provide reasonable protections for tenants residing in affected properties.
4. Schedule rehabilitation of apartment units to allow tenants to remain in the building/complex as long as possible during and after rehabilitation, working with empty units first.
5. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
6. Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.
7. Establish or utilize approved local counseling centers to provide homeowners and tenants with assistance to understand their options and implement their choices in the face of displacement.
8. If feasible, demolish or convert only dwelling units that are not occupied or vacant occupiable "dwelling units" (as defined in 24 CFR 42.305).
9. Target only those properties deemed essential to the need or success of the project to avoid displacement that is unnecessary.

Mitigation and Long-Term Recovery Planning

Missouri has designed a program to promote the movement of persons and families from the floodway, floodplain and designated Disaster Reduction Areas. The Housing program continues a long-standing buyout strategy established in the state since the flood of 1993. Moving people from harm's way and eliminating future development has been a tenet of the Missouri CDBG program for 25 years.

Missouri is a flood-prone state. With the amount of water prevalent in each of the disaster-declared counties, residents are experiencing flooding repeatedly. Eliminating development from the floodplain is the most effective strategy to achieve success. It is the ultimate mitigation program and it leads to resilient persons, families and communities.

Program rules and regulations will help enhance the existing state policies and direction. The 2-foot elevation requirement will provide added costs to the reconstruction of housing, making buyout a much more financially feasible option. To ensure that, Missouri policy will not prioritize or allow reconstruction inside the floodplain with the use of its CDBG-DR funds. If homes are substantially damaged, the only option will be a pre-flood buyout with relocation funding if the family moves into a new home within the community.

In each of the last two flooding events, 25% of the property damage has occurred outside of the 100- year floodplain. To support the designation of Disaster Reduction Areas, the State CDBG Program will provide a sample resolution with which communities may use to define and adopt these repetitive damage areas.

Construction standards included in the program will strongly urge sub-grantees and sub-recipients to adopt resilience building techniques in both new construction and rehabilitation.

The RPCs, working with the SEMA, have completed hazard mitigation plans for every county in the state. The CDBG Program will include a review requirement of each application submitted for financial assistance to be consistent with the approved hazard mitigation plan. SEMA's mitigation management section "works with local communities to reduce or avoid the adverse impacts that disasters have on Missourians". The CDBG Program has worked with the Hazard Mitigation Grant Program at SEMA to enhance the mitigation activities undertaken in Missouri's communities. Examples of those include buyouts, low-water crossing replacements, and tornado safe rooms.

The RPCs are listed as an integral partner in the Method of Distribution of CDBG-DR funds as well as a recipient of additional recovery planning dollars to continue the on-going efforts to instill resilience into at-risk communities. Reliance on the RPCs as a partner provides the benefit of dual perspective; the regional and local level. The RPC's relationships with state agencies also adds to their unique position as a positive reinforcement in disaster recovery activities.

Elevation Requirements Action Plan

Each Missouri grantee will be required to evaluate for cost reasonableness and for cost-benefit the impacts of elevation of structures substantially damaged inside the floodplain.

Elevation may include reinforcements based upon the age of condition of the residential structure, plumbing and electrical disconnections, excavations and grading, repairs to the foundation, cost of building permits, cost of labor and professional services such as structural engineers and architects and insurance. According to Home Advisor, the average cost to raise a single-family housing structure in Missouri is \$7346 as compared to the national average of \$5667. The typical range runs to \$12,930. ImproveNet cites an average cost of \$5800 with a range to \$14,000. Previous CDBG projects indicates a range from \$7500-\$25,000. Given the range, the State CDBG Program will estimate \$15,000 as the cost of the elevation of a home.

Photograph 11 – Flooding in West Plains, Missouri

The Missouri program creates a disincentive to remain in the floodplain by virtue of the elevation rules combined with the requirements for cost reasonableness. Depending upon the occupancy of the structure, the circumstance for assistance may differ:

1. No reconstruction may occur in the floodway or floodplain;
2. If elevation is determined to be infeasible, the property owner will be provided an alternative buyout.
3. Missouri will require elevation for substantially damaged properties at or above 2-ft above base flood elevation consistent with the rules outlined in the federal register.

Sustainability and Resilience Strategies Integration

The Missouri CDBG Program has designed a program that allows for a recovery for both individuals and communities and purposely mitigates future repetitive damage to property and loss of life. The implementation of buyouts and other mitigation and resilience building strategies will allow a stronger resistance to future flooding events.

Missouri has implemented housing quality standards into the rehabilitation, reconstruction and new construction of housing that promote energy efficiency and durability. Please see the Housing Program section of the Action Plan for a complete description of the housing quality standards, energy efficiency and green-building standards applicable to all grantees in the program.

Missouri is committed to building a resilient future from natural disasters. The state has a history of flooding and other natural disasters and has adopted strategies to rebound and recover with more efficiency and effectiveness each year. The organizational structure of long-term recovery is getting more and more recognition and status. Experts are working together to create long term recovery planning models with the idea of engaging state, federal and local resources in a manner not only to solve problems but position communities to take advantage of opportunities as they come along, and not let them go by.

Missouri leadership is recognizing the role of long-term recovery and is working to create the MDRF as an institutionalized effort among agencies and positions, rather than one of personalities and people.

Missouri has learned over the last 25 years of the returns garnered from mitigation. The flood buyout programs have paid for themselves repeatedly. It is a lesson in mitigation and resilience that shows a return on investment. That return can be realized in saving lives and property by applying the same tactics to all types of recovery activities.

Planning

Missouri has dedicated $1.5 million to disaster related planning activities. The funds will allow the state, cities, counties and regional planning commissions the opportunity to advance their existing recovery plans. Applications may be submitted direct by cities and counties or direct from regional planning commissions. The following types of plans will be accepted and reviewed for funding:

- Pre-disaster recovery planning
- Post-disaster recovery planning
- Updating and further detail to hazard mitigation planning including further identification of specific projects
- Incorporation of resilience building techniques into local planning
- Analysis and feasibility of combined, multi-jurisdictional facilities
- Duplication of any of the pilot plans developed from the 2013 or other previous disaster funding in other regional planning district areas
- State Disaster Recovery Framework planning
- Citizen outreach related to planning

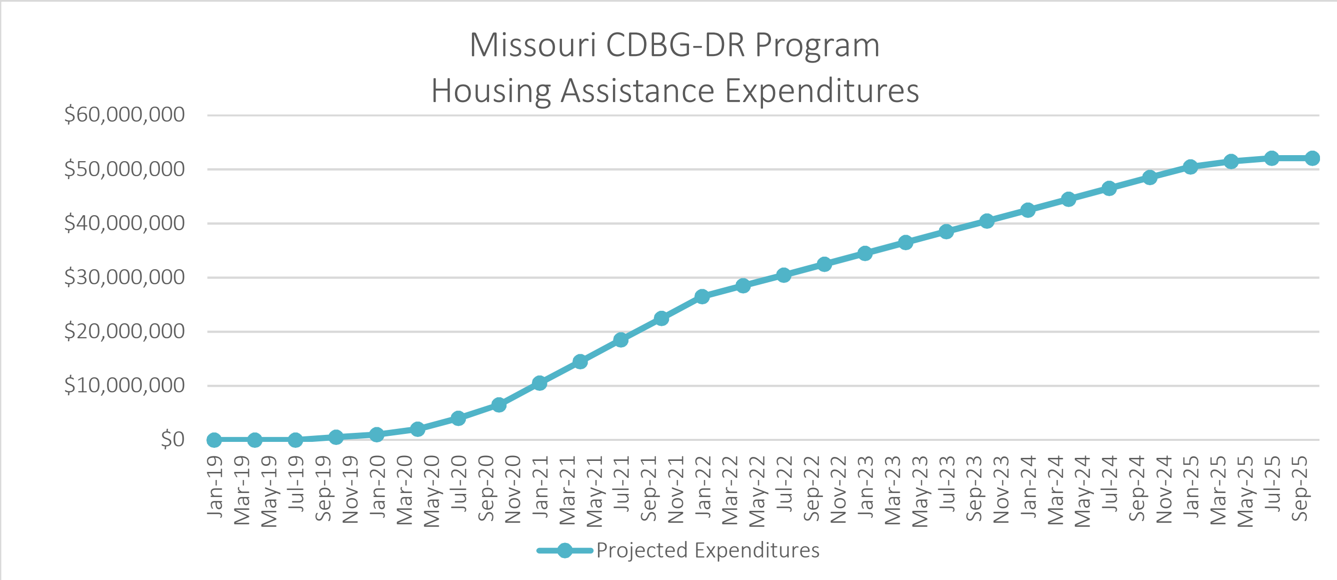
Planning applications must indicate how they are consistent with all local relevant plans such as land use plans, comprehensive plans and capital improvement plans, as well as other disaster preparedness and mitigation plans.

Of the $1.5M set-aside, up to $100,000 each (up to $500,000 total) will be set-aside for each of the 5 most impacted zip codes identified by HUD; up to $100,000 will be set-aside for the state recovery framework; and, up to $100,000 will be set a-side for citizen outreach activities related to planning. The remainder of the funds ($800k) will be made available by competitive application to each of the remaining regional planning commission areas for the planning activities listed above.

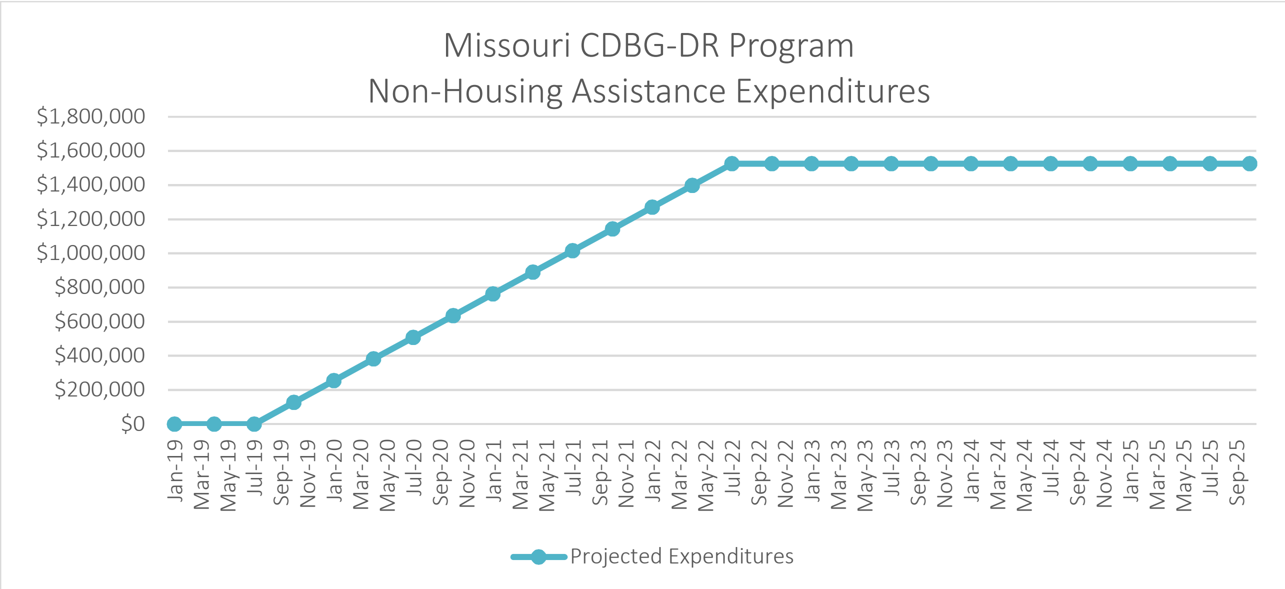
Infrastructure Programs and Economic Revitalization

This Action Plan addresses the unmet need in the area of housing. At the point at which the housing unmet need is satisfied, a formal amendment to the Plan will be submitted for public comment and HUD approval which outlines the method of distribution of the remaining funds in the areas of infrastructure and economic revitalization. The unmet needs for those categories outlined in this plan will be updated as necessary and access to the funds will be provided in detail.

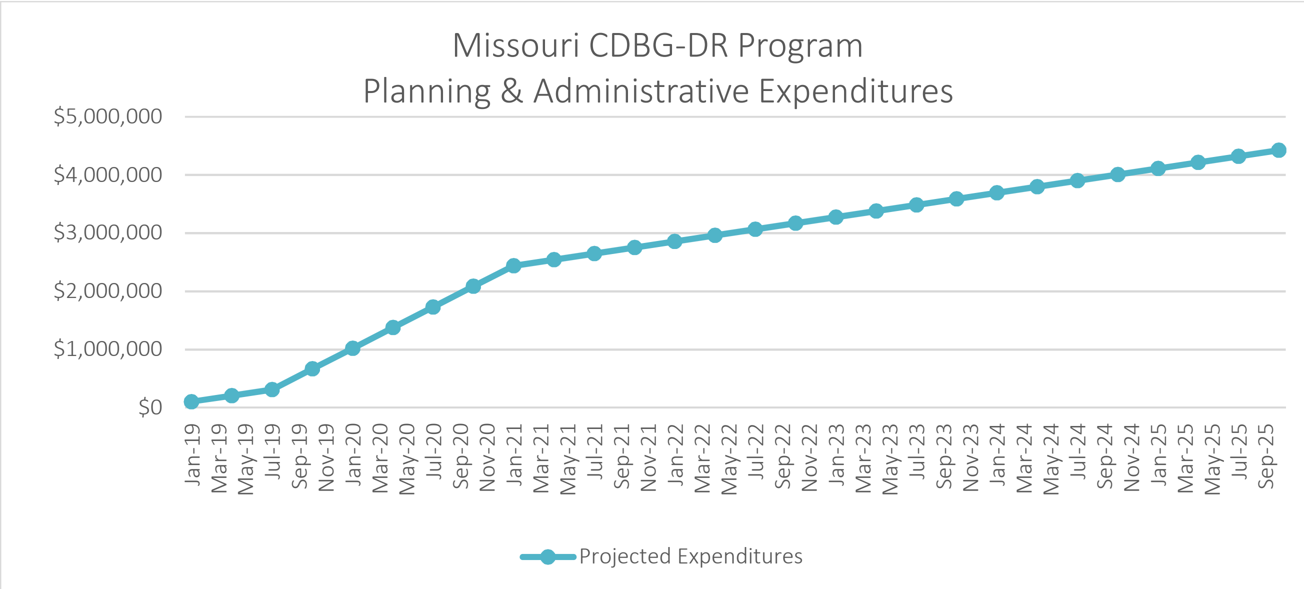
Projection of Expenditures and Outcomes



Missouri CDBG-DR Housing Program Expenditures				
Quarter	Projected Expenditure	Quarterly Projection	Actual Expenditure	Actual Quarterly Expended (per QPR)
1/2019	$0	$0		
4/2019	$0	$0		
7/2019	$0	$0		
10/2019	$500,000	$500,000		
1/2020	$1,000,000	$500,000		
4/2020	$2,000,000	$1,000,000		
7/2020	$4,000,000	$2,000,000		
10/2020	$6,500,000	$2,500,000		
1/2021	$10,500,000	$4,000,000		
4/2021	$14,500,000	$4,000,000		
7/2021	$18,500,000	$4,000,000		
10/2021	$22,500,000	$4,000,000		
1/2022	$26,500,000	$4,000,000		
4/2022	$28,500,000	$2,000,000		
7/2022	$30,500,000	$2,000,000		
10/2022	$32,500,000	$2,000,000		
1/2023	$34,500,000	$2,000,000		
4/2023	$36,500,000	$2,000,000		
7/2023	$38,500,000	$2,000,000		
10/2023	$40,500,000	$2,000,000		
1/2024	$42,500,000	$2,000,000		
4/2024	$44,500,000	$2,000,000		
7/2024	$46,500,000	$2,000,000		
10/2024	$48,500,000	$2,000,000		
1/2025	$50,500,000	$2,000,000		
4/2025	$51,500,000	$1,000,000		
7/2025	$52,083,250	$583,250		
10/2025	$52,583,250	$500,000		



Missouri CDBG-DR Non-Housing Program Expenditures				
Quarter	Projected Expenditure	Quarterly Projection	Actual Expenditure	Actual Quarterly Expended (per QPR)
1/2019	$0	$0		
4/2019	$0	$0		
7/2019	$0	$0		
10/2019	$127,083	$127,083		
1/2020	$254,166	$127,083		
4/2020	$381,249	$127,083		
7/2020	$508,332	$127,083		
10/2020	$635,415	$127,083		
1/2021	$762,498	$127,083		
4/2021	$889,581	$127,083		
7/2021	$1,016,664	$127,083		
10/2021	$1,143,747	$127,083		
1/2022	$1,270,830	$127,083		
4/2022	$1,397,913	$127,083		
7/2022	$1,525,000	$127,087		
10/2022	$1,525,000	$0		
1/2023	$1,525,000	$0		
4/2023	$1,525,000	$0		
7/2023	$1,525,000	$0		
10/2023	$1,525,000	$0		
1/2024	$1,525,000	$0		
4/2024	$1,525,000	$0		
7/2024	$1,525,000	$0		
10/2024	$1,525,000	$0		
1/2025	$1,525,000	$0		
4/2025	$1,525,000	$0		
7/2025	$1,525,000	$0		
10/2025	$1,525,000	$0		



Missouri CDBG-DR Planning and Admin Expenditures				
Quarter	Projected Expenditure	Quarterly Projection	Actual Expenditure	Actual Quarterly Expended (per QPR)
1/2019	$104,526	$104,526		
4/2019	$209,052	$104,526		
7/2019	$313,578	$104,526		
10/2019	$668,104	$354,526		
1/2020	$1,022,630	$354,526		
4/2020	$1,377,156	$354,526		
7/2020	$1,731,682	$354,526		
10/2020	$2,086,208	$354,526		
1/2021	$2,440,734	$354,526		
4/2021	$2,545,260	$104,526		
7/2021	$2,649,786	$104,526		
10/2021	$2,754,312	$104,526		
1/2022	$2,858,838	$104,526		
4/2022	$2,963,364	$104,526		
7/2022	$3,067,890	$104,526		
10/2022	$3,172,416	$104,526		
1/2023	$3,276,942	$104,526		
4/2023	$3,381,468	$104,526		
7/2023	$3,485,994	$104,526		
10/2023	$3,590,520	$104,526		
1/2024	$3,695,046	$104,526		
4/2024	$3,799,572	$104,526		
7/2024	$3,904,098	$104,526		
10/2024	$4,008,624	$104,526		
1/2025	$4,113,150	$104,526		
4/2025	$4,217,676	$104,526		
7/2025	$4,322,202	$104,526		
10/2025	$4,426,750	$104,548		

Section Six – Program Administration

Photograph 12 – AmeriCorps Registration (Courtesy of Steve Zumwalt – FEMA)

Administrative Funds

State administrative costs, including grantee administration costs, will not exceed five percent, $2,926,750 of the $58,535,000 allocation. Planning and administrative costs combined will not exceed 20 percent.

The provisions outlined under 42 U.S.C. 5306(d) and 24 CFR §570.489(a)(1)(i) and (iii) will not apply to the extent that they cap state administration expenditures and require a dollar-for-dollar match of state funds for administrative costs exceeding $100,000. Pursuant to 24 CFR §58.34(a)(3), except for applicable requirements of 24 CFR §58.6, administrative and management activities are exempt activities under this Action Plan.

Program Income

The use of CDBG-DR funds may potentially generate program income. Should any funds be generated, recovery of funds including program income, refunds and rebates will be used before drawing down additional CDBG-DR funds.. The DRGR system requires grantees to use program income before drawing additional grant funds, and ensures that program income retained by one will not affect grant draw requests for other grantees. Grantees will be required to report program income quarterly and will be subject to applicable rules, regulations and HUD guidance. Retention of program income will be in compliance with the grantee agreements. Policies and procedures for program income are included in the CDBG-DR Implementation Manual.

Pre-Agreement Costs

The regulation cited at 2 CFR 200.458 defines pre-agreement costs as “those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency”.

Since the disaster occurred in the spring of 2017 and access to the disaster funding is expected in early 2019, the Missouri CDBG Program anticipates the request of pre-agreement costs, consistent with the regulation, the accompanying CPD Notices and the related Federal Register for only a few specific project costs incurred.

Once a grant agreement is fully executed, the Missouri CDBG Program will allow the drawdown of pre- agreement costs associated with eligible disaster recovery activities dating back to the date of the disaster for subrecipients with appropriate documentation. The Missouri CDBG Program will submit only those costs that follow the CDBG cross-cutting regulations and only those that are a direct result of activities related to the presidentially declared flooding event. No requests shall be of the size or amount that will cause a substantial amendment to the Action Plan and all costs will be clearly identified in a category recognized in the Action Plan.

Citizen Participation Plan

The State of Missouri created a thorough citizen participation plan that encourages all citizens to participate in the development of the Action Plan for funds associated with the Supplemental Disaster CDBG-DR funds, as prescribed in Public Laws 115-123 and 115-56 and further detailed in the Federal Registers Volume 83, No. 157 dated Tuesday, August 14, 2018 and Volume 83, No. 28, dated Friday, February 9, 2018. These funds were provided to assist with unmet needs remaining from the historic flooding events of April and May 2017 in southern Missouri.

This citizen participation plan was developed in accordance with the requirements listed in 24 CFR Part

91.115 (Citizen Participation Plan for States). The plan provides citizens (including minorities, the disabled and non-English speaking persons), units of local government, and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so.

Developing the Needs Assessment

In order to most accurately reflect the unmet needs that exist in the "most impacted" areas of the disaster as defined by HUD, as well as the balance of the counties declared under DR-4317, the Missouri CDBG Program first enlisted the assistance of the Regional Planning Commissions and Councils of Government, engaging local governments, and the Community Action Agencies to complete a comprehensive review of affected housing, both owner- occupied and rental, infrastructure, community facilities, private business and commercial development. The current needs assessment will inform the development of the plan and determine the focus of the funding. Additionally, the CDBG Program sought the input of our state partners at the State Emergency Management Agency and the Missouri Housing Development Commission as well as engaged the members of the state Disaster Recovery Framework. The CDBG Program collected data from FEMA, SBA and NFIP to aid in the identification of unmet need in the areas of housing, economic revitalization, and infrastructure. Through the survey process, every Public Housing Authority was contacted with no impacts reported. There are no federally recognized Indian tribes in Missouri.

Publishing the Plan, Comments and Amendments

The state makes every effort to publish the draft Action Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. To do this, the draft Action Plan is published and made available to the public on or around November 9th, 2018. The plan will remain available on the DED website (www.ded.mo.gov). To notify the public of the plans' availability, public notification was provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan was also sent to other partner state agencies. The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments, as the state would also provide a copy of the plans to interested parties upon request. Comments would be accepted until December 9th. The state will make the plan available for a minimum 30-day comment period.

The state considers any comments or views of citizens and units of general local government received in writing or orally in preparing the final Action Plan. A summary of these comments, including those not accepted and reasons, therefore, will be attached to the final consolidated plan.

Substantial Amendments to the Action Plan will require public notice. The public notice will be made in the same manner as prescribed in this document. The thresholds for a substantial amendment are as follows:

1. Action Plan – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:
    a. a new funding source be added to the Plan
    b. the addition or deletion of an activity
    c. a change in program benefit or eligibility criteria
    d. the allocation for a new funding category or reallocation of a monetary threshold more than 25% of the allocation transferred between funding categories not to exceed HUD established maximums

Requirements for Local Governments Receiving CDBG-DR Funds

Recipients of CDBG-DR funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG-DR project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them.

Citizens shall be provided adequate and timely information, to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least the determination of needs, the review of the proposed activities, and the review of past program performance, in the following manner:

1) At least one public hearing shall be held prior to the submission of an application for housing and/or non-housing needs being submitted to the State for funding through the CDBG-DR program. Hearings shall be scheduled at a time and location felt to be most likely possible of the majority of interested citizens to attend without undue inconvenience. The development of needs and the review of the proposed activities and their possible environmental impact must be addressed at this hearing as reflected by minutes of the hearing. The hearing cannot be more than six months prior to application submittal. The second required hearing is held to address the performance on the funded grant at a minimum of 80% completion. The review of performance (during the grant) must be addressed in public hearing prior to grant close-out. Proof of said hearing will be part of close-out documentation.
2) Notification of all hearings shall be given a minimum of five full days (actually seven days, as the day of the notice and the day of the hearing cannot be counted as one of the five full days) in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution, and/or by posting letters, flyers, and any other forms that are clearly documented with wide circulation. All hearings must be accessible to handicapped persons.

Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance.

The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the decision-making time. Any criticism submitted in writing at any time should be answered in writing within fifteen working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Availability to the Public

The state will provide the Action Plan, as adopted, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at www.ded.mo.gov.

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the state's CDBG-DR Action Plan and the state's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the state has designated an appropriate and practicable procedure to handle complaints from citizens related to the consolidated plan, amendments, and performance reports. Upon receiving a complaint, the state will provide a timely, substantive written response to written citizen complains within a fifteen working day time period. Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1– 800–347–3735 or email: hotline@hudoig.gov).

Use of Citizen Participation Plan

The state will follow the citizen participation plan in full and to the best ability possible, as described above.

Accessibility Measures - Missouri CDBG Language Access Plan:

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons). The State of Missouri CDBG and CDBG-DR programs are a recipient of federal funds and, thus, obligated to reduce language barriers that can preclude meaningful access by LEP persons to DCA programs. Missouri CDBG has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency. Missouri's LAP plan may be found in Appendix B of this document.

List of Abbreviations

CAA – Community Action Agencies

CDBG-DR -Community Development Block Grants – Disaster Recovery

CoC – Continua of Care

COG – Council of Government

DED – Missouri Department of Economic Development

FEMA – Federal Emergency Management Agency

HUD – U.S. Department of Housing and Urban Development

LEP – Limited English Proficiency

MDRF – Missouri Disaster Recovery Framework

MHDC – Missouri Housing Development

MIDRO – Missouri Interfaith Disaster Response Organization

MOVOAD – Missouri Voluntary Agencies Active in Disaster

NDRF – National Disaster Recovery Framework

NFIP – National Flood Insurance Program

PDA – Preliminary Disaster Assessment

PPVL – Personal Property Verified Loss

RPC – Regional Planning Commission

RSF – Recovery Support Functions

SBA – Small Business Administration

SEMA – State Emergency Management Agency

SOVI – The CDC Social Vulnerability Index

The Partnership – Governor's Faith-Based and Community Service Partnership with Disaster Recovery

THIRA – Threat and Hazard Identification and Risk Assessment

UGLG – Units of General Local Government

Table of Figures

Appendix A - Capacity Assessment and Implementation Plan

Disaster Recovery Website DR-4317

A common means for communication among all parties will be the website. Development and build out of the site will incorporate memorandums, Q&A, best practices, and organizing and posting on the website, any information sought by any of our partners and any potential beneficiaries. The website will by Section 508 compliant (as are all of the State of Missouri sponsored websites.) It will convert, as necessary, to the predominant languages prevalent in the region.

The CDBG Program is actively working with the DED Communications unit and the State of Missouri Office of Administration Information Technology unit to design and build the site. The website will maintain its own address as well as access direct from the DED homepage and will contain the following information:

- Grantee Application Status information
- Beneficiary Application Status information
- Draft and final Action Plans
- Action Plan amendments, as applicable
- Unmet needs assessment background data
- Grant awards
- Current approved DRGR action plan
- DRGR Quarterly Performance Reports
- Copies of relevant procurement documents, grantee administrative contracts, and details of ongoing procurement processes
- Technical Memoranda
- Contractor fraud reporting or hotline
- A means for an applicant “review request” process prior to making an appeal to avoid
- unnecessary legal review
- Guidance and form for filing a Formal Appeal
- Program general inquiry phone number and general inquiry email
- Program and policy FAQs
- General program expenditure and production progress reports
- Public announcements such as housing program intake center locations, application intake beginning, and end periods, etc.
- Referral to other support agencies and nonprofit services for items such as mortgage foreclosure, insurance claim disputes, title clearance
- Links to standardized program forms
- A link for homeowner/contractor disputes on extended warranty claims
- Link to FEMA floodplain maps, NFIP and related information

Appendix B – Missouri CDBG Language Access Plan

Missouri CDBG Language Access Plan:

Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons). The State of Missouri CDBG and CDBG-DR programs are a recipient of federal funds and, thus, obligated to reduce language barriers that can preclude meaningful access by LEP persons to the programs. Missouri CDBG has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency.

In preparing this Plan, CDBG conducted a four factor analysis, considering (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Agency or its federally funded programs, (2) frequency with which LEP persons come into contact with Agency's program, (3) nature and importance of the program, activity, or service to people's lives, and (4) resources available and costs. MO CDBG will review and update, on an annual basis with the Annual Action Plan, this LAP in order to ensure continued responsiveness to community needs.

Purpose

The purpose of this plan is to ensure beneficiaries of CDBG meaningful access to services, programs, and activities although they may be limited in their English language proficiency. MO CDBG is committed to this Language Access Plan as the appropriate response to meeting our beneficiary's needs.

Definitions

Recipient means the entity designated as a recipient for assistance with federal or state funding. This is any entity which receives federal assistance, directly from MO CDBG or from another recipient. This includes, but is not limited to, any unit of local government, public housing authority, community housing development organization, public or private nonprofit agency, developer, contractor, private agency or institution, builder, property manager, residential management corporation, or cooperative association.

LEP means Limited English Proficiency persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Note that for the purposes of gathering data for the four- factor analysis, MO CDBG used the U.S. Census definition as any individual who speaks a language at home other than English as their primary language, and who speaks or understands English "not well" or "not at all".

LAP means this language access plan.

Description of Covered Programs

The Missouri Department of Economic Development is the recipient of funding from the United States Department of Housing and Urban Development (HUD), which consists of Community Development Block Grant Program (CDBG) funds and Community Development Block Grant Program- Disaster Recovery (CDBG-DR) funds. DED then subgrants this funding to eligible Recipients throughout the State of Missouri and such Recipients undertake projects in specific services areas (i.e. within a particular local government, a group of counties, or other identified service area).

- CDBG: provides grants to units of local government in non-entitlement areas for the development of viable communities through street, potable water, sewer, community facility, and economic development activities.
- CDBG-DR: disaster allocations dedicated to recovery from various disasters, which must be utilized from housing, infrastructure, economic development, hazard mitigation, and planning

Four Factor Analysis

Factor One: Identifying Missouri's LEP Population Who May Need Language Assistance

MO CDBG's service area generally consists of the entire State of Missouri. Communities meeting certain population threshold set forth by HUD are designated as entitlement communities and are not eligible to receive state CDBG funds. However, these communities can receive CDBG-DR funds if they are part of the communities included in the Disaster Declaration resulting in a CDBG-DR supplemental allocation. To simplify the considerations for this Plan, all counties in the State of Missouri will be included in the Four Factor Analysis.

In order to determine the LEP population of Missouri, MO CDBG reviewed the 2015 5-year American Community Survey (ACS) data (Table B16001) to find what the primary languages were for people that spoke English less than "very well". Based on this data, in addition to English, Missouri's population speaks the following languages: Spanish (54,831 or 1.0%), Chinese (10,857 or 0.2%), Vietnamese (7,335 or 0.1%), German (5,263 or 0.1%), Serbo-Croatian (5,486 or 0.1%), (African Languages (4,612 or 0.1%), Arabic (4,404 or 0.1%), and Russian (3,576 or 0.1%).

This data shows that the Spanish speaking population is the largest LEP population in Missouri, and, therefore, would likely be the LEP population most likely to be encountered by MO CDBG. Because MO CDBG does not directly provide assistance to individuals, MO CDBG also looked at the ACS data to determine what LEP populations are present on a county level.

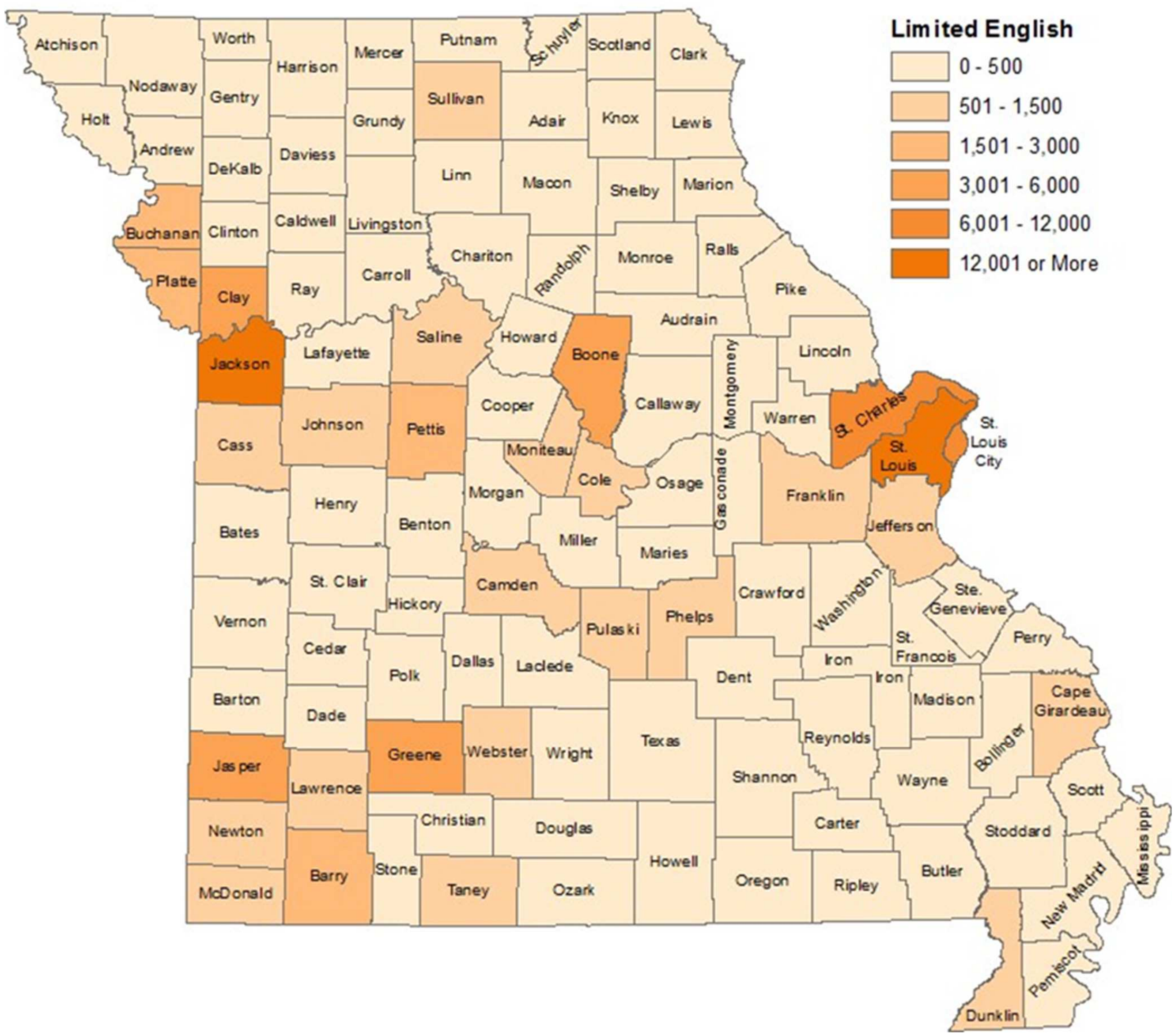
HUD has established a "safe harbor" regarding the responsibility to provide translation of Vital Documents for LEP populations. This safe harbor is based upon the number and percentages of the service area- eligible population or current beneficiaries and applicants that are LEP. According to the safe harbor rule, HUD expects translation of Vital Documents to be provided when the eligible LEP population in the service area or Beneficiaries exceeds 1,000 persons or if it exceeds 5% of the eligible population or Beneficiaries along with more than 50 people. In cases where more than 5% of the eligible population speaks a specific language, but fewer than 50 persons are affected, there should be a translated written notice of the person's right to an oral interpretation.

MO CDBG has identified fifteen counties and St. Louis City that have Spanish speaking LEP populations exceeding the 1,000 person or 5% threshold. These are depicted in the following table. Few other areas have an LEP population other than the Spanish speaking population that exceeds the HUD safe harbor threshold, as indicated in the table below.

The table below sets forth safe harbors for written translations for Missouri Counties and St. Louis City. Italicized Counties represent Counties included in DR-4317 Presidential Disaster Declaration.

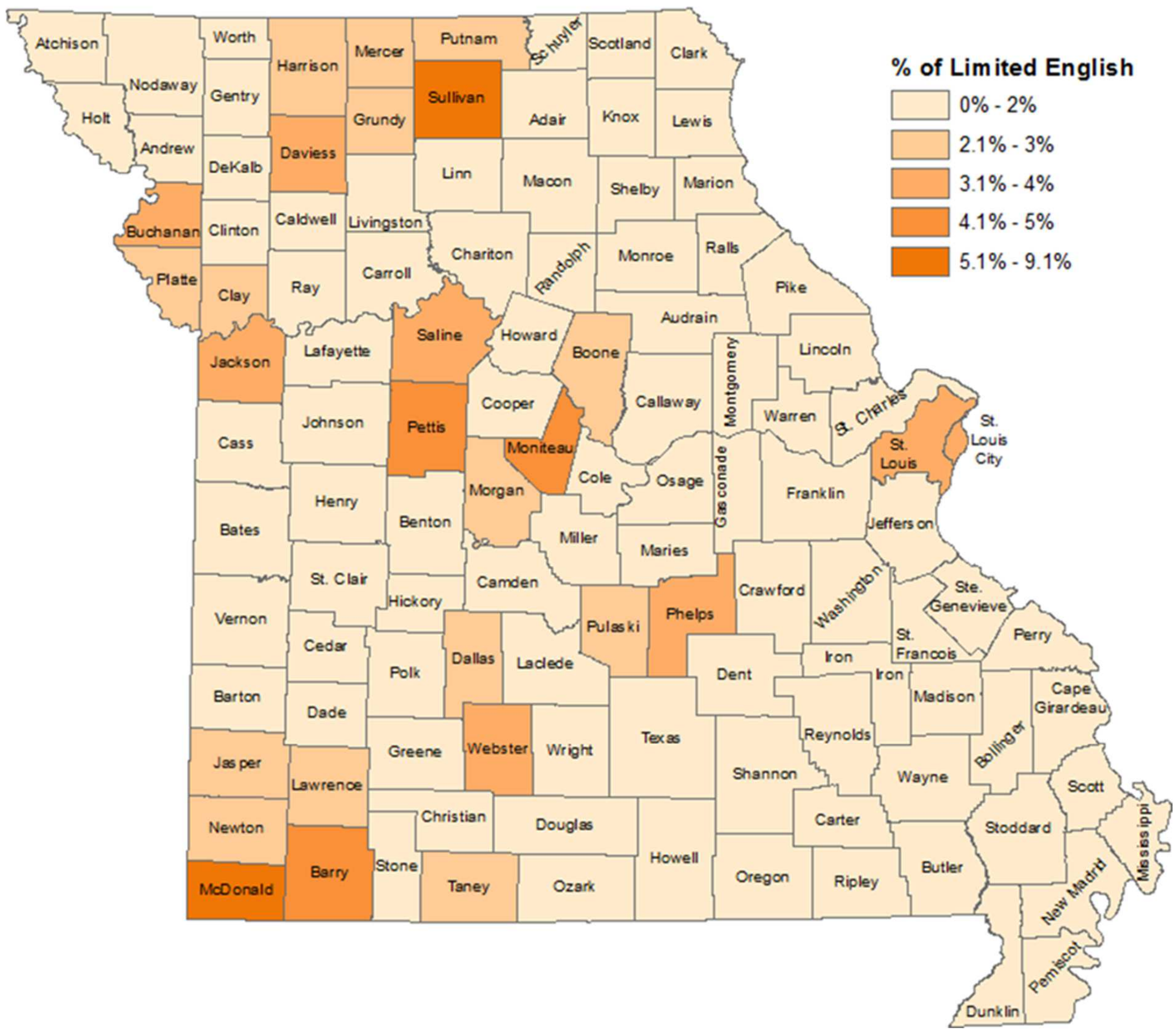
Size of Language Group	Recommended Provision of Written Language Assistance	Missouri County and Language
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents	Barry – Spanish Boone – Chinese Buchanan – Spanish Cass – Spanish Clay – Spanish Jackson – Spanish, Vietnamese, African Jasper – Spanish McDonald -Spanish Pettis – Spanish Pulaski – Spanish St. Charles – Spanish, Vietnamese St. Louis City/County – Spanish, Russian, Serbo-Croatian, Chinese, Korean, Vietnamese, Arabic, Other- Asian Webster - German
More than 5% of the eligible population or beneficiaries *and* more than 50 in number	Translated vital documents	Barry - Spanish McDonald – Spanish Sullivan - Spanish
More than 5% of the eligible population or beneficiaries *and* 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.	None
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.	

Population of Limited English Proficiency By County



Source – 2016 ACS 5 year (2012-2016) Estimates, Selected Social characteristics

Per Capita Percentage of Limited English Proficiency By County



Source: 2016 ACS 5yr (2012-2016) Estimates, Selected Social Characteristics

Factor Two: Frequency with Which LEP Persons May Come into Contact with Missouri CDBG

As a by-product of sub granting funds to communities, MO DED does not often come into direct contact with LEP persons, as most direct contact with an LEP person occurs at the project level between the Recipient and the LEP person. There are instances, however, when MO DED may expect to come into contact with LEP persons at the State level, and accommodations are necessary. MO CDBG has determined that persons with LEP are most likely to come into contact with Agency programs as follows:

- Persons participating in the annual planning process for MODED programs
- Individuals utilizing the State's compliant/application status process
- Individuals accessing the website

Factor Three: Nature and Importance of the Program, Activity, or Service Provided by Missouri CDBG

Missouri CDBG understands that the more important the activity, information, services or program, or the greater the possible consequences of the contact to the LEP persons, the more likely language services are needed. The programs administered by Missouri CDBG result in Recipients of HUD funding from Missouri CDBG carrying out projects, and in some instances, providing direct assistance to LEP individuals and families. It is likely that the type of project activities proposed by the Recipient will impact the level and type of language assistance needed to be provided. At the Missouri CDBG level, it is most important for language assistance services be provided for citizen participation efforts undertaken by MO CDBG, as this is when it is most likely that LEP individuals will come into contact with MO CDBG directly. It is also important that MO CDBG provides information to LEP persons that will allow them to file a complaint if they believe they have been denied the benefits of language assistance.

Factor Four: Available Resources and Costs

MO CDBG has limited resources available for administration of HUD funded programs. These resources primarily come from the percentage of CDBG and CDBG-DR Program funding that is allowed to be used for administration of such programs. MO CDBG will use these administration funds to provide LEP services, in addition to using such funds for fulfilling all other statutory and regulatory requirements of these programs.

The costs associated with providing LEP services will vary depending upon the service provided. A cost-effective method of providing LEP services would be to make LEP persons aware of the many brochures, handbooks, booklets, factsheets and forms that are available in multiple languages on the HUD website. MO CDBG may also, when appropriate, utilize free websites to translate written materials. The costliest option for providing LEP services would be to contract with outside persons that are proficient in interpretation of spoken word and in translation of documents. MO CDBG will do this when necessary. It is expected that the cost of obtaining such services will vary depending upon the nature of the services requested, and the service provider selected.

Point of Contact

The CDBG Communication Specialist, reachable at 573/751-3600, is the designated point of contact for coordination of LEP compliance and services.

Identification of LEP Individuals who need Language Assistance

MO CDBG will review American Community Survey data as it is updated to determine the size of LEP populations and the languages of LEP populations within the State of Missouri.

Language Assistance to be Provided

MO CDBG will provide language assistance as requested and as appropriate.

- MO CDBG will use and make persons aware of the many brochures, handbooks, booklets, factsheets and forms that are available in multiple languages on the HUD website. Many of these are available at: https://ded.mo.gov/DisasterRecoveryWhen, and if appropriate, MO CDBG may utilize free websites and computer programs to translate written materials.
- As needed, MO CDBG will contract with entities that are proficient in interpretation of spoken word and translation of documents. A list of identified contractors is available through the Missouri Office of Administration.
- MO CDBG will maintain an open contract with an approved Office of Administration vendor to provide language assistance through a voice interpretation service via telephone. MO CDBG will keep a copy of the instructions for using this service on the Department's internal share drive.
- MO CBDG will provide, on a prior request basis, interpretation assistance for public hearings from a qualified contractor.
- MO CDBG will translate Vital Documents, including but not limited to the Citizen Participation Plan and Complaint procedures, into Spanish (and other languages as need may be identified in the future).

Staff Training

MO CDBG will ensure that staff persons are given proper LEP training to provide or obtain language assistance.

- Staff will be trained on the language assistance requirements by being made aware of applicable laws and resources.
- Staff will be made aware of the four-factor analysis and Language Assistance Plan, as presented in this document.
- Staff will be trained to utilize the "I speak" cards, as necessary for outreach.

MO CDBG will provide a link on the MO CDBG webpage to the HUD translated materials website and provide notification to LEP persons of the availability of language assistance services (both interpretation and translation) through public notices published in conjunction with the Annual Action Plan and on the MO CDBG webpage. Additionally, MO CDBG will provide its recipients with technical assistance regarding their responsibilities to provide language assistance services to individuals in their jurisdiction and/or service area.

Monitoring and Updating the LAP

MO CDBG will review American Community Survey data as it is updated to determine the size of LEP populations and the languages of LEP populations within the State of Missouri, review additional guidance provided by HUD, and update the Language Assistance Plan accordingly.

Complaints

If you believe you have been denied the benefits of this Plan, please file a written complaint with the MO CBDG-DR Communications Specialist:

CDBG-DR Communications Specialist
Missouri Department of Economic Development
PO Box 118
Jefferson City, MO 65102
FAX: (573)526-4157

Missouri CDBG Grantee Language Access Plan Guidance

This document provides additional guidance on how to accomplish timely and reasonable steps to provide Limited English Proficient (LEP) persons with meaningful access to programs and activities funded by the federal government and awarded by MO CDBG. Refer to the CDBG LAP Policy and the Civil Rights section of the CDBG Administrative Manual, then complete the steps described in detail below to develop a LAP:

Step 1: Provide General Information:

Provide the following information at the beginning of the local government's Language Access plan

- Grantee
- CDBG Grant Number
- Target Area
- Preparer's name, phone number, email address

Step 2: Conduct a Four-Factor Analysis to determine how to provide needed language assistance

Recipients are required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations. As a starting point, a recipient may conduct an individualized assessment that balances the following four factors:

Use data to answer the question:

How many Limited English Proficient people are in your local government's city or county's jurisdiction?

Attach maps (if applicable) or other relevant data to your Language Access Plan. All data or maps provided must be accurately sourced.

Factor 1: Determine the number of LEP persons served or encountered in the eligible service population

Most grantees will depend on the most recent release of data from the American Community Survey Table B16001 and Table S1601, updated each year in December, to determine the number of LEP persons in the service area. In the case where the overall jurisdiction numbers fall below the Safe Harbor thresholds to provide translated written documents but existing or planned CDBG target areas exist, the CDBG grantee must evaluate whether there are LEP households within the target areas that may need notification or other LAP services. The grantee's evaluation should use local knowledge or data or other relevant data in conducting its evaluation and should indicate its conclusions regarding the steps necessary reach out to these households in the language they speak to ensure that adequate notification is achieved. This evaluation will be particularly important for housing grants where eligible applicants for assistance may need application or other documents translated to take advantage of available services. All data provided must be accurately sourced.

The size of the language group determines the recommended provision for written language assistance, as determined by the "safe harbors" outlined in the federal register, 72 FR 2732.

Table 1- Safe Harbor Thresholds

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents

More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

A vital document is any document that is critical for ensuring meaningful access to the grantees' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in is not provided accurately or in a timely manner. Where appropriate, grantees are encouraged to create a plan for consistently determining, over time and across its various activities, what documents are "vital" to the meaningful access of the LEP populations they serve. Leases, rental agreements and other housing documents of a legal nature enforceable in U.S. courts should be in English.

Factor 2: The frequency with which LEP persons come into contact with the program:

Grantees should assess, as accurately as possible, the frequency with which they have or should have contact with an LEP individual from different language groups seeking assistance. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual's program or activity contact is unpredictable or infrequent. But even recipients that serve LEP persons on an unpredictable or infrequent basis should determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate. It may be as simple as being prepared to use one of the commercially available telephonic interpretation services to obtain immediate interpreter services. In applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.

For CDBG grants, grantees must engage with the public at these critical steps:

- When notifying the public about a grant award application and its proposed activities
- When notifying the public about the grant award and its funded activities
- When seeking applicants to participate in the program (e.g., when seeking homeowners for rehabilitation assistance)
- When seeking qualified contractors
- When working with homeowners selected for assistance
- When seeking bids from builders to construct the homes
- When notifying the public about the grant award closeout and its accomplishments

Answer the following questions:

What is the nature of the program? e.g. providing improved water and sewer services.
What is the importance of the program? Would denial or delay of access to services or information could serious or even life-threatening implications for the LEP individual?

Factor 3: The nature and importance of the program, activity, or service provided by the Program:

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP persons, the more likely the need for language services. The grantee needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual. Decisions by HUD, another federal, state, or local entity, or the recipient to make a specific activity compulsory in order to participate in the program, such as filling out particular forms, participating in administrative hearings, or other activities, can serve as strong evidence of the program's importance.

Determine the resources to be made available if any

Factor 4: The resources available and costs to the recipient:

Language assistance that a grantee might provide to LEP persons includes, but is not limited to

a) Oral interpretation services;
b) Bilingual staff;
c) Telephone service lines interpreter;
d) Written translation services;
e) Notices to staff and subrecipients of the availability of LEP services; or
f) Referrals to community liaisons proficient in the language of LEP persons.
g) Provide "I speak" card, available at https://www.lep.gov/ISpeakCards2004.pdf
h) Use of the many brochures, handbooks, booklets, factsheets, and forms that are available in multiple languages on the HUD website, https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep#Booklets

A recipient's level of resources and the costs that would be imposed on it may have an impact on the nature of the steps it should take. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Resource and cost issues, however, can often be reduced by technological advances; sharing of language assistance materials and services among and between recipients, advocacy groups, and federal grant agencies; and reasonable business practices. Where appropriate, training bilingual staff to act as interpreters and translators, information sharing through industry groups, telephonic and video conferencing interpretation services, pooling resources and standardizing documents to reduce translation needs, using qualified translators and interpreters to ensure that documents need not be "fixed" later and that inaccurate interpretations do not cause delay or other costs, centralizing interpreter and translator services to achieve economies of scale, or the formalized use of qualified community volunteers, for example, may help reduce costs. Recipients should carefully explore the most cost- effective means of delivering competent and accurate language services before limiting services due to resource concerns. Small recipients with limited resources may find that entering into a bulk telephonic interpretation service contract will prove cost effective. Large entities and those entities serving a significant substantiated before using this factor as a reason to limit language assistance. Such recipients may find it useful to articulate, through documentation or in some other reasonable manner, their process for determining that language services would be limited based on resources or costs.

The four-factor analysis necessarily implicates the "mix" of LEP services the recipient will provide. Recipients have two main ways to provide language services: Oral interpretation in person or via telephone interpretation service (hereinafter "interpretation") and through written translation (hereinafter "translation"). Oral interpretation can range from on-site interpreters for critical services provided to a high volume of LEP persons through commercially available telephonic interpretation services. Written translation, likewise, can range from translation of an entire document to translation of a short description of the document. In some cases, language services should be made available on an expedited basis, while in others the LEP individual may be referred to another office of the recipient for language assistance. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis. For instance, a public housing provider in a largely Hispanic neighborhood may need immediate oral interpreters available and should give serious consideration to hiring some bilingual staff. (Of course, many have already made such arrangements.) By contrast, there may be circumstances where the importance and nature of the activity and number or proportion and frequency of contact with LEP persons may be low and the costs and resources needed to provide language services may be high – such as in the case of a voluntary public tour of a recreational facility – in which pre-arranged language services for the particular service may not be necessary. Regardless of the type of language service provided, quality and accuracy of those services can be critical in order to avoid serious consequences to the LEP person and to the recipient. Recipients have substantial flexibility in determining the appropriate mix.

Step 3: Prepare a Language Access Plan (LAP) and submit it to your CDBG Field Rep that includes:

After completing the four-factor analysis and deciding what language assistance services are appropriate, grantees must develop a Language Assistance Plan to address identified needs of the LEP populations it serves. An effective LAP should include:

- The Four Factor Analysis
- The points and types of contact the agency and staff may have with LEP persons
- The procedures the grantee will use to identify LEP individuals who need language assistance
- Ways in which language assistance will be provided by the grantee
- A list of vital documents to be translated (if necessary)
- The grantee's plan for training staff members on LEP guidance and the LAP
- The grantee's plan for monitoring and updating the LAP
- A plan for complaints and appeals

Language Access Plan Frequently Asked Questions

Who are limited English proficient (LEP) persons?
Persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand. For purposes of Title VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.

What is Title VI and how does it relate to providing meaningful access to LEP persons?
Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

What do Executive Order (EO) 13166 and the Guidance require?
EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance.

Who must comply with the Title VI LEP obligations?
All programs and operations of entities that receive financial assistance from the federal government, including but not limited to state agencies, local agencies and for-profit and non-profit entities, must comply with the Title VI requirements. A listing of most, but not necessarily all, HUD programs that are federally assisted may be found at the "List of Federally Assisted Programs" published in the Federal Register on November 24, 2004 (69 FR 68700). Sub-recipients must also comply (i.e., when federal funds are passed through a recipient to a sub-recipient). As an example, Federal Housing Administration (FHA) insurance is not considered federal financial assistance, and participants in that program are not required to comply with Title VI's LEP obligations, unless they receive federal financial assistance as well. [24 CFR 1.2 (e)].

Does a person's citizenship and immigration status determine the applicability of the Title VI LEP obligations?
United States citizenship does not determine whether a person is LEP. It is possible for a person who is a United States citizen to be LEP. It is also possible for a person who is not a United States citizen to be fluent in the English language. Title VI is interpreted to apply to citizens, documented non-citizens, and undocumented non-citizens. Some HUD programs require recipients to document citizenship or eligible immigrant status of beneficiaries; other programs do not. Title VI LEP obligations apply to every beneficiary who meets the program requirements, regardless of the beneficiary's citizenship status.

What is expected of recipients under the Guidance?
The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four-factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP. HUD recognizes that some projects' budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden upon the projects. Where a HUD recipient can demonstrate such a material burden, HUD views this as a critical item in the consideration of costs in the four-factor analysis. However, refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI. The agency may, for example, have a contract with another organization to supply an interpreter when needed; use a telephone service line interpreter; or, if it would not impose an undue burden, or delay or deny meaningful access to the client, the agency may seek the assistance of another agency in the same community with bilingual staff to help provide oral interpretation service.

What are examples of language assistance?
Language assistance that a grantee might provide to LEP persons includes, but is not limited to:

- Oral interpretation services;
- Bilingual staff;
- Telephone service lines interpreter;
- Written translation services;
- Notices to staff of the availability of LEP services; or
- Referrals to community liaisons proficient in the language of LEP persons.

How may a grantee determine the language service needs of a beneficiary?
Grantees should elicit language service needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). If the prospective beneficiary's response indicates a need for language assistance, the grantee may want to give applicants or prospective beneficiaries a language identification card (or "I speak" card). Language identification cards invite LEP persons to identify their own language needs. Such cards, for instance, might say "I speak Spanish" in both Spanish and English, "I speak Vietnamese" in both Vietnamese and English, etc. To reduce costs of compliance, the federal government has made a set of these cards available on the Internet located at: https://www.lep.gov/resources/resources.html

How may a grantee's limited resources be supplemented to provide the necessary LEP services?
A grantee should be resourceful in providing language assistance as long as quality and accuracy of language services are not compromised. The grantee itself need not provide the assistance but may decide to partner with other organizations to provide the services. In addition, local community resources may be used if they can ensure that language services are competently provided. In the case of oral interpretation, for example, demonstrating competency requires more than self-identification as bilingual. Some bilingual persons may be able to communicate effectively in a different language when communicating information directly in that language but may not be competent to interpret between English and that language.

In addition, the skill of translating is very different than the skill of interpreting and a person who is a competent interpreter may not be a competent translator. To ensure the quality of written translations and oral interpretations, HUD encourages grantees to use members of professional organizations. Examples of such organizations are national organizations, including American Translators Association (written translations), National Association of Judicial Interpreters and Translators, and International Organization of Conference Interpreters (oral interpretation); state organizations, including Colorado Association of Professional Interpreters and Florida Chapter of the American Translators Association; and local legal organizations such as Bay Area Court Interpreters.

While HUD recommends using the list posted on the official LEP website, its limitations must be recognized. Use of the list is encouraged, but not required or endorsed by HUD. It does not come with a presumption of compliance. There are many other qualified interpretation and translation providers, including in the private sector.

May grantees rely upon family members or friends of the LEP person as interpreters?
Generally, grantees should not rely on family members, friends of the LEP person, or other informal interpreters. In many circumstances, family members (especially children) or friends may not be competent to provide quality and accurate interpretations. Therefore, such language assistance may not result in an LEP person obtaining meaningful access to the grantees' programs and activities. However, when LEP persons choose not to utilize the free language assistance services expressly offered to them by the grantee but rather choose to rely upon an interpreter of their own choosing (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so, at their own expense. Grantees may consult HUD LEP Guidance for more specific information on the use of family members or friends as interpreters. While HUD guidance does not preclude use of friends or family as interpreters in every instance, HUD recommends that the grantee use caution when such services are provided.

Are leases, rental agreements and other housing documents of a legal nature enforceable in U.S. courts when they are in languages other than English?
Generally, the English language document prevails. The translated documents may carry a disclaimer. For example, "This document is a translation of a HUD-issued legal document. HUD provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document."

Where both the landlord and tenant contracts are in languages other than English, state contract law governs the leases and rental agreements. HUD does not interpret state contract law. Therefore, s regarding the enforceability of housing documents of a legal nature that are in languages other than English should be referred to a lawyer well-versed in contract law of the appropriate state or locality. Neither EO 13166 nor HUD LEP Guidance grants an individual the right to proceed to court alleging violations of EO 13166 or HUD LEP Guidance.

In addition, current Title VI case law only permits a private right of action for intentional discrimination and not for action based on the discriminatory effects of a grantee's practices. However, individuals may file administrative complaints with HUD alleging violations of Title VI because the HUD grantee failed to take reasonable steps to provide meaningful access to LEP persons.

The local HUD office will intake the complaint, in writing, by date and time, detailing the complainant's allegation as to how the state failed to provide meaningful access to LEP persons. HUD will determine jurisdiction and follow up with an investigation of the complaint.

Who enforces Title VI as it relates to discrimination against LEP persons?
Most federal agencies have an office that is responsible for enforcing Title VI of the Civil Rights Act of 1964. To the extent that a grantee's actions violate Title VI obligations, then such federal agencies will take the necessary corrective steps. The Secretary of HUD has designated the Office of Fair Housing and Equal Opportunity (FHEO) to take the lead in coordinating and implementing EO 13166 for HUD, but each program office is responsible for its grantees' compliance with the civil-rights related program requirements (CRRPRs) under Title VI.

How does a person file a complaint if he/she believes the state is not meeting its Title VI LEP obligations?
If a person believes that the state is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD's local Office of FHEO. For contact information of the local HUD office, go to the HUD website or call the housing discrimination toll free hotline at 800-669- 9777 (voice) or 800-927-9275 (TTY).

What will HUD do with a complaint alleging noncompliance with Title VI obligations?
HUD's Office of FHEO will conduct an investigation or compliance review whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance with Title VI obligations by the state. If HUD's investigation or review results in a finding of compliance, HUD will inform the state in writing of its determination. If an investigation or review results in a finding of noncompliance, HUD also will inform the state in writing of its finding and identify steps that the state must take to correct the noncompliance. In a case of noncompliance, HUD will first attempt to secure voluntary compliance through informal means. If the matter cannot be resolved informally, HUD may then secure compliance by:

a) Terminating the financial assistance of the state only after the state has been given an opportunity for an administrative hearing; and/or
b) Referring the matter to DOJ for enforcement proceedings.

How will HUD evaluate evidence in the investigation of a complaint alleging noncompliance with Title VI obligations?
Title VI is the enforceable statute by which HUD investigates complaints alleging a grantee's failure to take reasonable steps to ensure meaningful access to LEP persons. In evaluating the evidence in such complaints, HUD will consider the extent to which the state followed the LEP Guidance or otherwise demonstrated its efforts to serve LEP persons. HUD's review of the evidence will include, but may not be limited to, application of the four-factor analysis identified in HUD LEP Guidance. The four-factor analysis provides HUD a framework by which it may look at all the programs and services that the grantee provides to persons who are LEP to ensure meaningful access while not imposing undue burdens on grantees.

What is a safe harbor?
A "safe harbor," in the context of this guidance, means that the grantee has undertaken efforts to comply with respect to the needed translation of vital written materials. If a grantee conducts the four-factor analysis, determines that translated documents are needed by LEP applicants or beneficiaries, adopts an LAP that specifies the translation of vital materials, and makes the necessary translations, then the grantee provides strong evidence, in its records or in reports to the agency providing federal financial assistance, that it has made reasonable efforts to provide written language assistance.

What "safe harbors" may grantees follow to ensure they have no compliance finding with Title VI LEP obligations?
HUD has adopted a "safe harbor" for translation of written materials, as outlined in Table 1 of this document. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the grantee is in noncompliance.

Rather, the "safe harbors" provide a starting point for grantees to consider

Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;

- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and
  Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the "safe harbor" would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

When HUD conducts a review or investigation, it will look at the total services the grantee provides, rather than a few isolated instances.

Is the grantee expected to provide any language assistance to persons in a language group when fewer than 5 percent of the eligible population and fewer than 50 in number are members of the language group?
HUD recommends that grantees use the four-factor analysis to determine whether to provide these persons with oral interpretation of vital documents if requested.

Are there "safe harbors" provided for oral interpretation services?
There are no "safe harbors" for oral interpretation services. Grantees should use the four-factor analysis to determine whether they should provide reasonable, timely, oral language assistance free of charge to any beneficiary that is LEP (depending on the circumstances, reasonable oral language assistance might be an in-person interpreter or telephone interpreter line).

What are the obligations of HUD grantees if they operate in jurisdictions in which English has been declared the official language?
In a jurisdiction where English has been declared the official language, a HUD grantee is still subject to federal nondiscrimination requirements, including Title VI requirements as they relate to LEP persons.

Where can I find more information on LEP?
Additional resources on HUD compliance policies and guidance can be found in the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons Notice: https://www.gpo.gov/fdsys/pkg/FR-2007-01-22/pdf/07-217.pdf. Complete LEP resources and information for all federal programs can be found on this website: https://www.lep.gov/

For CDBG LAP technical assistance, contact:
CDBG-DR Communications Specialist
Missouri Department of Economic Development
PO Box 118
Jefferson City, MO 65102
Phone: (573) 751-3600
Fax:(573) 526-4157

Appendix C – Certification, Waiver and Alternative Requirement, SF424

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation under this notice must make the following certifications with its action plan:

A. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.

B. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

C. The grantee certifies that the action plan for disaster recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with funds under this notice are consistent with its action plan.

D. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this notice.

E. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.

F. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).

G. State grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.

H. The grantee certifies that it is complying with each of the following criteria:

   a. Funds will be used solely for necessary expenses related to disaster relief, long- term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

   b. With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

   c. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.

   d. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

i. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or

ii. For purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (i).

I. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601– 3619), and implementing regulations, and that it will affirmatively further fair housing.

J. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing:

   a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
   b. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

K. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-123 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a. under section VI and its Implementation Plan and Capacity Assessment and related submissions to HUD referenced at A.1.b. under section VI.

L. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

M. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

N. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

O. The grantee certifies that it will comply with applicable laws

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729.

Robert B. Dixon

Director, Missouri Department of Economic Development

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received: 08/20/2018	4. Applicant Identifier:
5a. Federal Entity Identifier: CFDA:14.228	5b. Federal Award Identifier: 2017 HIM B-18-DP-29-0001

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	State of Missouri
* b. Employer/Taxpayer Identification Number (EIN/TIN):	44-6000987
* c. Organizational DUNS:	8790146860000

d. Address:

* Street1:	301 West High
Street2:	P.O. Box 118
* City:	Jefferson City
County/Parish:	Cole
* State:	MO: Missouri
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	65101-1517

e. Organizational Unit:

Department Name:	Division Name:
Economic Development	Business & Community Services

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	
* First Name:	Marcy
Middle Name:	
* Last Name:	Oerly
Suffix:	
Title:	CDBG Manager
Organizational Affiliation:	
* Telephone Number:	573-751-5964
Fax Number:	
* Email:	marcy.oerly@ded.mo.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.228

CFDA Title:

State Community Development Block Grant Program

*** 12. Funding Opportunity Number:**

2017 HIM B-18-DP-29-0001

* Title:

Public Law 115-123

Disaster 4317

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

The above referenced disaster funds are administered by the State of Missouri to address unmet housing, infrastructure and economic revitalization needs due to the national disasters of 2017.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: MO-all
* b. Program/Project: MO-all

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 08/20/2018
* b. End Date: 08/20/2024

18. Estimated Funding ($):

* a. Federal	58,535,000.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	58,535,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr.
* First Name: Robert

Middle Name: B.

* Last Name: Dixon

Suffix:

* Title: Director

* Telephone Number: 573-751-4770
Fax Number:

* Email: rob.dixon@ded.mo.gov

* Signature of Authorized Representative: Rochelle L. Reeves
* Date Signed: 3/8/19

View Burden Statement

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Missouri Department of Economic Development	12/17/2018

SF-424D (Rev. 7-97) Back

DELEGATION OF AUTHORITY

In accordance with the provisions of Sections 251.080 and 620.010.6, RSMo, I, Robert B. Dixon, Director of the Missouri Department of Economic Development, hereby authorize the following individual to sign any document and execute any contract on behalf of the Missouri Department of Economic Development, for which the signature of the Director would otherwise be required. The signature of the below designated individual will serve as an authorized signature for our Department for the aforementioned purposes.

Rochelle Reeves
General Counsel
Missouri Department of Economic Development

Rochelle L. Reeves
Signature

This Delegation of Authority is effective immediately.

1/2/2019
Date

Robert B. Dixon
Robert B. Dixon, Director
Missouri Department of Economic Development

In witness whereof I have hereunto subscribed my name and affixed my official seal this 3rd day of January, 2019.

Dawn Ellen Overbey
NOTARY PUBLIC

MY COMMISSION EXPIRES:

NOTARY PUBLIC NOTARY SEAL STATE OF MISSOURI

DAWN ELLEN OVERBEY
My Commission Expires
December 13, 2019
Moniteau County
Commission #15456865

Appendix D – Public Comment

Public Comments and Responses

The CDBG-DR Action Plan was open for public comment on November 14, 2018. Comments regarding the CDBG-DR Action Plan were accepted through December 14, 2018 via web form submission at: https://ded.mo.gov/content/community-development-block-grant-disaster-recovery. Comments could also be mailed to the Missouri Department of Economic Development, 301 W. High Street, P.O. Box 118, Jefferson City, MO 65102.

Note: To aid in clarity for the reader, misspelled words in the comments were corrected, but no content of the comment was edited.

Comment 1:

I am the Ozark Independent Living (OIL) representative on the Howell County Long-Term Recovery Committee. (OIL is the Center for Independent Living which serves seven counties in south-central Missouri.) I have read the CDBG Disaster Recovery Action Plan regarding the storms which impacted our area of the state in April 2017 and am pleased to see that the plan addresses the need for affordable, accessible housing. This is a crucial issue for folks with disabilities, many of whom are often disproportionately affected by disasters such as this. The other elements of the plan are also of vital concern for our 65775 area. I believe the measures proposed will be a cost-effective way to serve as a good investment in the long-term economic development and prosperity of our area. This grant will have an extremely positive effect on the communities which receive funding, and I know that the West Plains area will use it to its greatest benefit.

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.)

Comment 2:

Although I am aware that there are housing needs in our zip code area, most of these were not created by the flood of 2017. Since we are now 20 months post flood, most housing needs that were related to the flood of 2017 have already been met either from relocation or repairing their existing homes using personal funds or private loans obtained through financial intuitions. Those that were fortunate enough to have flood insurance sometimes had to overextend their finances to fill the gap between their insurance and the actual cost of repairs. Some of these residents have also relocated to other areas. Most people cannot wait 20 months for assistance to have a place to live. It has created a great burden on many of them, but they have done well with what they have had to work with.

We do however have many needs for infrastructure and revitalization. We are without facilities for Police Department, Jail, and City Hall. We also have many streets and sidewalks that are in need of repair where they had water standing over them for days. We still have structures that need to be torn down that were not included in the buyouts on the first round of government funding for that purpose. The people that have over extended their finances to repair or relocate should also be eligible to apply for some of these funds if they have already met their housing needs.

It seems that if these funds are allocated in the manner that is proposed that when each of these zip codes documents that there housing needs have been met or that they do not have the housing needs, those zip codes should have the opportunity to apply for and receive the remainder of the total amount of funding that was originally designated to them to use for improving infrastructure and for revitalization without having to wait on each individual zip code to finish their housing needs. Then if there are funds left over in some of those zip code areas, those funds should be returned to a pool for secondary funding for the other zip codes involved.

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

63935 – Doniphan area
63965 – Van Buren area
64850 – Neosho area
65616 – Branson area
65775 – West Plains area

The remaining 20 percent of the funds ($11,707,000) are eligible to serve the unmet housing needs in the 55 counties that were presidentially declared disaster areas under DR-4317 (see map, page 12 of the Action Plan.)

HUD did not distinguish specific allotments of the 80 percent funding per zip code, nor specific allotments of the 20 percent funding for the declared counties.

As stated in the Action Plan, page 7, at the point that the unmet housing need is exhausted, the CDBG Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of infrastructure and economic revitalization. The current Plan provides the unmet needs information for both of those categories and the amended Plan will provide an update as well as a method of distribution that reflects areas most impacted. The amendment will provide detail on categories of funding available, deadline dates, as applicable, and any maximums per applicant or beneficiary.

The current Action Plan does not outline assistance for repair reimbursement, or relocation support for individuals that have already met their housing needs. However, if it becomes apparent, through updated needs assessments, a reimbursement activity may added to the Plan through a formal amendment.

Comment 3:

Is it possible for CDBG-DR to provide funding for needed public infrastructure such as roads, water, sewer, power, etc. to support any new low income multi-family housing that may be developed as part of the housing recovery effort?

Response:

Please refer to page 62, under item 3, Affordable Rental Recovery. The last sentence of item 3 states the following regarding multi-family housing:

"CDBG-DR funds can be used to support infrastructure for multi-family housing."

Comment 4:

We NEED money to restore our Carter County Courthouse, Van Buren, MO 63965. We don't want a "justice center"... we want our Historical Courthouse restored and reoccupied by the County Offices! The employees of the County want this done too with the exception of the current presiding commissioner.

We, the people, have not been listened to nor represented!! PLEASE help us find the money to restore our Courthouse! Thank you!

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

63935 – Doniphan area
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Comment 5:

WE NEED MONEY TO GET OUR Carter County Courthouse RESTORED! We, the people, want it restored, not replaced by a "justice" center. Our representatives are not listening to us nor helping us... please help us. Thank you!

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

63935 – Doniphan area
63965 – Van Buren area
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Comment 6:

We need funding to restore our Carter County Courthouse. It is the HUB of our county & community. Our downtown was built around the Courthouse and the downtown is trying to reestablish but most people need the business of the Courthouse to have viable businesses. Our presiding commissioner has not listened to WE, the people, NOR REPRESENTED US... He will be out of office 1/1/19 and we are looking forward to moving forward to RESTORING our Courthouse, rather than building a "justice center", even if it means obtaining private funding. We would like some help with funding out of the $100 million that the Governor spoke of in April 2018. Thank you! The Citizens of Carter County, MO

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

63935 – Doniphan area
63965 – Van Buren area
64850 – Neosho area
65616 – Branson area
65775 – West Plains area

The remaining 20 percent of the funds ($11,707,000) are eligible to serve the unmet housing needs in the 55 counties that were presidentially declared disaster areas under DR-4317 (see map, page 12 of the Action Plan.)

As stated in the Action Plan, page 7, at the point that the unmet housing need is exhausted, the CDBG Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of infrastructure and economic revitalization. The current Plan provides the unmet needs information for both of those categories and the amended Plan will provide an update as well as a method of distribution that reflects areas most impacted. The amendment will provide detail on categories of funding available, deadline dates, as applicable, and any maximums per applicant or beneficiary.

Comment 7:

We, the people of Carter County, MO, are seeking funding to "revitalize our downtown" and that includes restoring our historic Courthouse... WE, the PEOPLE, of Carter County are working diligently to get this project funded and done. We feel a shiny new "Justice Center", up on the highway rather than in our Downtown, is Unjust! Our downtown is like a ghost town without the hustle and bustle of our Courthouse... this is directly impacting the economics of our town, Van Buren, MO. WE NEED HELP!! Please allocate some of the $100 million to help RESTORE our historic Courthouse that is VITAL to the health of our downtown and community. Thank you for your consideration!

Response:

Through the regular CDBG program, the Missouri Department of Economic Development is offering a Downtown Revitalization funding category for the upcoming 2019 funding. It is encouraged that communities review the 2019 Action Plan that will outline the guidelines of the funding categories (the Action Plan will be out for public comment in January 2019) and attend the CDBG application training that will be held in the late spring or early spring of 2019. The 2019 Action Plan and all upcoming events and trainings will be posted on the CDBG website: https://ded.mo.gov/content/community-development-block-grants.

Regarding the Courthouse, the U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

63935 – Doniphan area
63965 – Van Buren area
64850 – Neosho area
65616 – Branson area
65775 – West Plains area

The remaining 20 percent of the funds ($11,707,000) are eligible to serve the unmet housing needs in the 55 counties that were presidentially declared disaster areas under DR-4317 (see map, page 12 of the Action Plan.)

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Comment 8:

Please consider allocating funding for the restoration of the flooded homes in our town that still have not been renovated and reoccupied due to lack of funding. Many homes are still sitting empty in Carter County since the 4/17 flood due to lack of money to restore them. The homes were flooded, many not in the flood plain nor insured for flooding. Please allocate funding for our COURTHOUSE too! Our beautiful historic Courthouse is still sitting empty and the downtown economics are suffering due to this travesty. Please HELP our COUNTY and the PEOPLE of our town, Carter, Van Buren, MO

Response:

Please refer to Section Five, Method of Distribution and Connection to Unmet Need, page 62, Homeownership Assistance and Tenant Assistance. This section of the Action Plan outlines housing rehabilitation guidelines for homes located in and out of the floodplain.

Regarding the Carter County Courthouse, the U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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Comment 9:

I am the City Administrator of Willow Springs and we also were severely damaged by the Flood of 2017 and isolated areas of our town was hit and flooded to the point of rescues. Many residents here are in need of help due to their financial situation and we now have areas that residents have left, areas which now stands a dilapidated home, blighted areas. We appreciate the opportunity to re-store the hopes of people who say that they will never be the same. With these funds we as a very small community may eventually be able to bring new and refreshed homes to low to moderate income based families. Also as a City, we feel this is also important support to revitalize the growth of economic development for our town. Thank you so much!
Beverly Hicks, City Administrator

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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Comment 10:

We created the Howell County Long-Term Recovery Committee consisting of city and county officials, faith based organizations and many civic organizations to help in the recovery of residents of Howell County who were affected by the April 2017 flood. We have been together helping with these needs since July of 2017 and have helped several residents to date, however, some of the issues are too big financially for us to resolve and are very pleased to have the opportunity to share this plan with our community, who even though are very resilient, have needs beyond the help we can provide. This funding serves as a hope for restoration and to help mitigate areas of potential flooding so that flooding does not affect our community in the future in the same devastated way. We are very thankful for funding so that we may give opportunity to people who did not think that restoration was possible. Thanks, Beverly Hicks, Vice-Chair HCLTRC

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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The remaining 20 percent of the funds ($11,707,000) are eligible to serve the unmet housing needs in the 55 counties that were presidentially declared disaster areas under DR-4317 (see map, page 12 of the Action Plan.)

Comment 11:

There have been many plans that could have helped restore the Carter Courthouse. It is my belief that the Carter County Commissioners have not acted on anything but a justice center. We have a building that could hold all county offices. Please help us restore the Carter County Courthouse and put the county offices in the building where they belong. Thank you, Linda Terry

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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Comment 12:

I realize that helping people who lost their homes during 2017 flood should get first priority with this money. However, if money is left over, I urge you to use it to restore our 150 year old historic courthouse. This building is the centerpiece of our county and would certainly meet the definition of infrastructure. This building is important to keep businesses in the downtown area operating. Most other infrastructure damaged by the flood has already been repaired using money from other sources.

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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needs information for both of those categories and the amended Plan will provide an update as well as a method of distribution that reflects areas most impacted. The amendment will provide detail on categories of funding available, deadline dates, as applicable, and any maximums per applicant or beneficiary.

Comment 13:

Dear Director Dixon:

Thank you for the opportunity to provide comment on the State of Missouri: Action Plan for Disaster Recovery (DR-4317). On behalf of the U.S. Green Building Council (USGBC), our more than 10,000 member companies, and strong Missouri community of members and credential holders, we contact you to recommend that the Missouri Department of Economic Development maintain the existing green building requirements – which includes LEED – for new construction and major rehabilitation projects for 2018 Community Development Block Grant Disaster Recovery Funding (CDBG-DR), and we recommend that any acceptable green building approach include ENERGY STAR as a prerequisite. These programs continue to demonstrate measurable economic impacts across all building asset classes including housing.

USGBC and LEED in Missouri USGBC is a non-profit organization committed to transforming the way all buildings and communities are designed, built, and operated to enable a sustainable, prosperous, and resilient environment that improves both the overall cost of buildings as well as the quality of life for occupants. Representing the full range of the building sector including builders, product manufacturers, professional firms, and real estate, nearly 150 Missouri organizations are USGBC members, and there are over 3,600 individuals in Missouri who hold a LEED professional credential.

Our most well-known green building system, LEED, has been utilized by the Missouri market in order to facilitate the development of high-performing and durable buildings, including homes. Currently, there are over 400 LEED-certified commercial and high-rise residential projects in Missouri, amounting to a total of over 40 million square feet. Under the LEED for Homes certification system, there are over 250 mid-rise and low-rise residential units, as well as single-family homes, that have earned LEED certification.

LEED also supports the state-wide economy in Missouri, contributing an estimated $3.37 billion to the state GDP and helping to create, or sustain an estimated 39,000 jobs from 2015 to 2018. Missourians understand the short and long term value of achieving LEED certification for their projects.

LEED and Resilience

USGBC applauds the Missouri Department of Economic Development in strongly encouraging CDBG-DR grantees to incorporate a Resilient Home Construction Standard in their projects. As noted in the draft plan, a comprehensive resilient or disaster resistant building program will increase a home's resilience to natural hazards, including high winds, hail, and heavy storms. By specifically addressing resilience as a critical component in reconstruction following a major disaster, Missouri communities will be better positioned to assess current and future risk and will thus be better prepared for future destructive events.

LEED continues to strategically optimize the value of resilience planning through its projects. Furthermore, LEED designs and builds its buildings on the path to exceptional resilience, while also saving substantial amounts of energy, water, and money. Specifically, LEED offers credits that help contribute to the overall resilience of a project including sustainable site assessment, rainwater management, building life-cycle impact

reduction, and increased levels of energy performance. The LEED process, which includes purposeful design and third-party validation, has helped projects achieve critical resilience outcomes.

Recommendation for Missouri Action Plan

As administered by the U.S. Department of Housing and Urban Development (HUD), CDBG-DR funds have been awarded to Missouri to ensure long-term recovery of community infrastructure following devastating floods throughout the state in 2017. In order to ensure that 2018 CDBG-DR funding is used effectively to rebuild in ways that help mitigate future (major) weather events in Missouri, USGBC recommends that any green building approach by a CDBG-DR grantee be required to meet ENERGY STAR standards as a prerequisite.

Incorporating energy efficiency strategies, like those encouraged via ENERGY STAR, into building projects is an important facet of a more comprehensive and holistic resilience and sustainability approach. ENERGY STAR and LEED work together to empower property developers, owners, and occupants to enhance projects' energy and water efficiency and reduce overall power load requirements, thus enhancing opportunities for resilience. For example, the LEED for Homes system uses ENERGY STAR for Homes as a core performance standard, while LEED systems for mid-rise and high-rise existing residential buildings incorporate ENERGY STAR certification as an option. While LEED represents a comprehensive approach to project sustainability, durability, and resilience, ENERGY STAR is an integral component to LEED in ensuring superior operational and financial performance.

USGBC stands ready to assist the Missouri Department of Economic Development in implementing its CDBG-DR program so as to ensure high-performance, economically advantageous, resilient housing to enhance the overall resilience of Missouri communities.

We look forward to serving you and your State as a resource where appropriate and appreciate the collaborative partnership that we have been able to build with Missourians across the State thus far. We appreciate your consideration of our recommendations for the Missouri action plan. If you have any questions or seek additional information, please contact Bryan Howard at (202) 640-2344 or bhoward@usgbc.org or Julie Peterson at (202) 374-4449 or jpeterson@usgbc.org.

Sincerely,

Bryan Howard
Legislative Director
U.S. Green Building Council

Julie Peterson
Director, Central Plains
U.S. Green Building Council

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) The Missouri Department of Economic Development appreciates the assistance that the U.S. Green Building Council can provide while developing and incorporating green building and resilience/sustainability approaches into its housing program in accordance with the August 14, 2018, Vol. 83, No. 157 and the February 9, 2018, Vol. 83, No. 28 Federal Registers.

Comment 14:

The 2017 flood was a bad blow to our home and with no flood insurance to be had and we have tried for several years we have little course of action, the flood pushed debris under our house making it impossible to get under to repair electric problems, vent problems and to try to address black mold now growing under the home. The flood also removed much of the knoll (trees, rock dike and all under-brush that kept the flood waters at bay) our house was built on making future flooding dangerous to our home, all we own as well as our lives. FEMA allotted us $1100.00 to repair our sewage system but for many friends and neighbors I would of still been trying to remove the many, many trees in our yard and other things I was not capable of. We ask for our home and acreage to be bought and torn down so no one else will be put in the impossible situation I am now in. I look forward to your response. Much more was washed away and damage done but you should have records of that. Cary Woodward, 10842 county road 7530, Pottersville, Mo. 65790

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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Please refer to page 57, Voluntary Local Buyout and Acquisition, of the Action Plan. This section of the Action Plan outlines the residential buyout guidelines for homes located in a floodplain or a disaster risk reduction area.

Comment 15:

We have unmet financial needs for my Father's (Manley Smith) house in Van Buren, Mo. Due to the flood of 2016.

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:

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Note: Disaster 4317, for which the CDBG-DR funds allocated under Public Law 115-123 are addressing, was designated for damages caused by severe storms, tornadoes, straight-line winds and flooding occurring from April 28 to May 11, 2017.

Comment 16:

The South Central Region had a tremendous flooding impact to public infrastructure--far greater than the impact to housing. Perhaps some portion of the $58,000,000 can be spent to construct more resilient public infrastructure and structural flood mitigation facilities?

Response:

The U.S. Department of Housing and Urban Development (HUD) has specified, by rule, that all disaster funds for Missouri allocated under Public Law 115-123 must first serve unmet housing needs; with 80 percent of the funds ($46,828,000) prioritized in 5 zip code areas:
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Comment 17:

Please consider the requirement of on-site storm water management techniques (i.e. rain gardens, bioswales, etc.) at any new large multi-family residential developments (4 dwelling units or greater). It is important to reduce the amount of storm water runoff created by these new developments, in an effort to reduce the type of flash flooding which caused DR-4317 in the first place!

Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) Storm water management techniques should be incorporated into environmental review evaluations, especially as it pertains to floodplains, wetlands, or rivers. Multi-family residential developments usually require a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharge. Storm water discharge is also often regulated by floodplain management

ordinances under the National Flood Insurance Program. Additionally, best management practices and consultation with interested agencies may be required to reduce the impacts of storm water runoff.

Comment 18:

Will there be a demolition project program?

Response:

Demolition will be an allowable activity. Please see Section Five, Method of Distribution and Connection to Unmet Need, of the Action Plan.

Comment 19:

Top page 7: "At the point that the unmet housing need is exhausted..."
What constitutes exhausted need? Will determination of exhausted need be tied in a draconian way to the unmet need data in the action plan? Is there a time period when the analysis will be performed? If so, will allow time for funds to move to other activities? If "exhausted need" is too strictly enforced, might it limit flexibility of funding over the lifetime of the funds?
(no need to answer these-they're just comments for consideration)

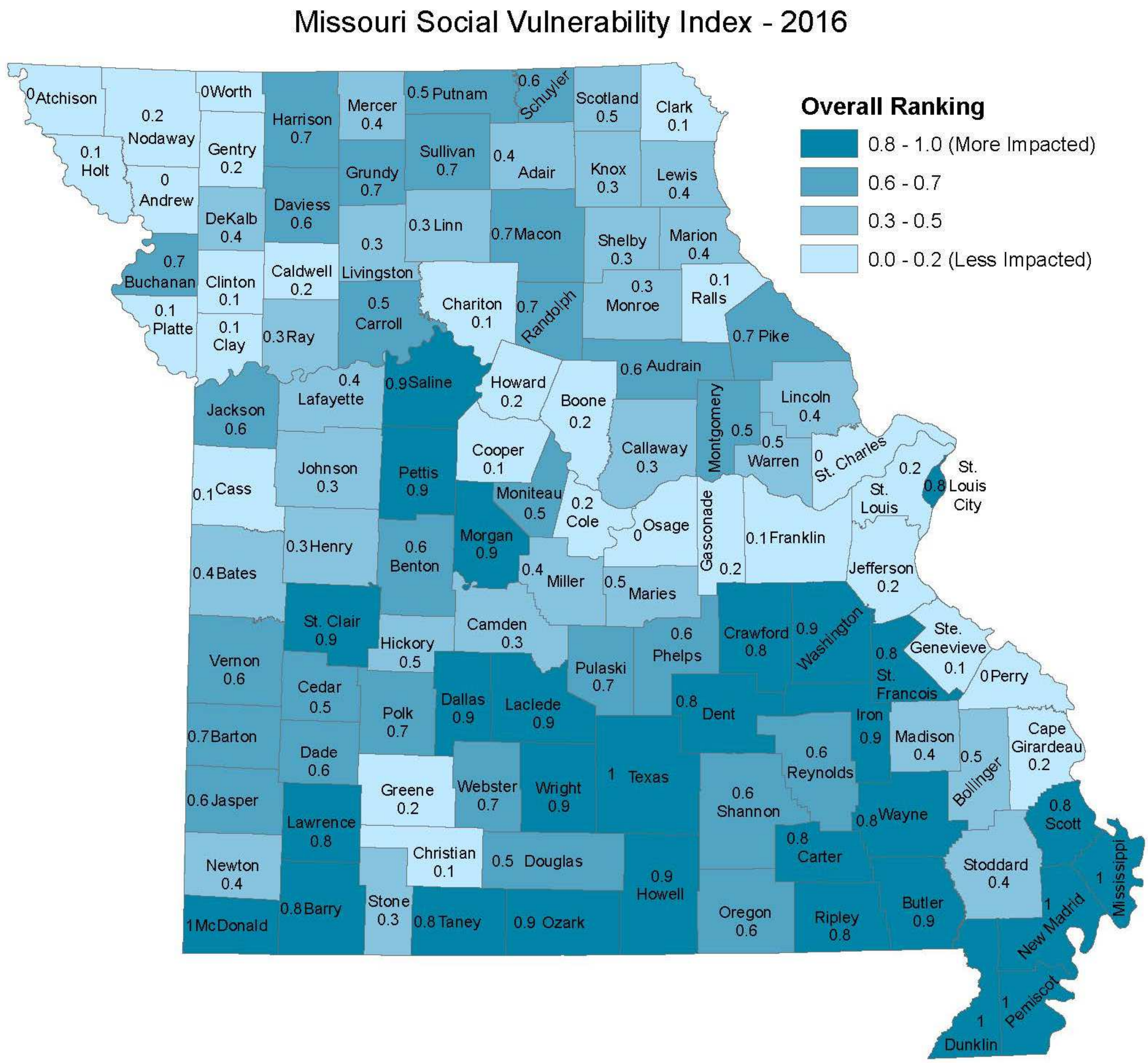
Response:

Thank you for your input regarding the State of Missouri's Action Plan for Disaster Recovery (DR-4317.) When it is determined that the communities with unmet housing needs, associated with DR-4317, have utilized existing funding, and there is still unallocated disaster funding available, the CDBG Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of infrastructure and economic revitalization. The current Plan provides the unmet needs information for both of those categories and the amended Plan will provide an update as well as a method of distribution that reflects areas most impacted. The amendment will provide detail on categories of funding available, deadline dates, as applicable, and any maximums per applicant or beneficiary.

Appendix E – Priority Most Impacted Criteria for Application Evaluation (for areas outside the five zip codes)

Damage Assessment for Counties Eligible for Individual Assistance

County	# of Damaged Units	# of Total Units	% of Units Damaged
Bollinger	17	4,805	0.35%
Butler	150	16,616	0.90%
Carter	152	2,480	6.13%
Christian	20	30,093	0.07%
Crawford	8	9,290	0.09%
Dent	9	5,889	0.15%
Douglas	39	5,110	0.76%
Dunklin	15	12,680	0.12%
Franklin	94	40,197	0.23%
Gasconade	30	6,168	0.49%
Greene	74	119,141	0.06%
Howell	287	16,214	1.77%
Iron	13	4,050	0.32%
Jasper	61	45,731	0.13%
Jefferson	269	82,308	0.33%
Madison	37	4,685	0.79%
Maries	16	3,642	0.44%
McDonald	56	8,294	0.68%
Newton	259	22,023	1.18%
Oregon	36	4,339	0.83%
Osage	12	5,046	0.24%
Ozark	67	4,267	1.57%
Pemiscot	24	6,939	0.35%
Phelps	37	16,838	0.22%
Pulaski	58	15,298	0.38%
Reynolds	44	2,652	1.66%
Ripley	98	5,353	1.83%
Shannon	45	3,176	1.42%
St. Louis County	264	401,716	0.07%
St. Genevieve	3	7,176	0.04%
Stone	56	12,667	0.44%
Taney	101	21,769	0.46%
Texas	48	9,239	0.52%
Wayne	44	5,612	0.78%
Wright	9	7,395	0.12%
Total	**2,552**	**968,898**	**0.26%**


Missouri Social Vulnerability Index - 2016
Overall Ranking
0.8 - 1.0 (More Impacted)
0.6 - 0.7
0.3 - 0.5
0.0 - 0.2 (Less Impacted)
0 Atchison
0.2 Nodaway
0 Worth
0.1 Holt
0 Andrew
0.2 Gentry
0.7 Harrison
0.4 Mercer
0.5 Putnam
0.6 Schuyler
0.5 Scotland
0.1 Clark
0.7 Sullivan
0.4 Adair
0.3 Knox
0.4 Lewis
0.7 Grundy
0.6 Daviess
0.4 DeKalb
0.7 Buchanan
0.1 Clinton
0.2 Caldwell
0.3 Livingston
0.3 Linn
0.7 Macon
0.3 Shelby
0.4 Marion
0.1 Platte
0.1 Clay
0.3 Ray
0.5 Carroll
0.1 Chariton
0.7 Randolph
0.3 Monroe
0.1 Ralls
0.7 Pike
0.6 Audrain
0.6 Jackson
0.4 Lafayette
0.9 Saline
0.2 Howard
0.2 Boone
0.4 Lincoln
0.3 Callaway
0.5 Montgomery
0.5 Warren
0 St. Charles
0.2 St. Louis
0.8 St. Louis City
0.1 Cass
0.3 Johnson
0.9 Pettis
0.1 Cooper
0.5 Moniteau
0.2 Cole
0 Osage
0.2 Gasconade
0.1 Franklin
0.2 Jefferson
0.4 Bates
0.3 Henry
0.6 Benton
0.9 Morgan
0.4 Miller
0.5 Maries
0.9 St. Clair
0.5 Hickory
0.3 Camden
0.7 Pulaski
0.6 Phelps
0.8 Crawford
0.9 Washington
0.8 St. Francois
0.1 Ste. Genevieve
0 Perry
0.6 Vernon
0.5 Cedar
0.7 Polk
0.9 Dallas
0.9 Laclede
0.8 Dent
0.9 Iron
0.4 Madison
0.2 Cape Girardeau
0.7 Barton
0.6 Dade
0.6 Reynolds
0.5 Bollinger
0.6 Jasper
0.8 Lawrence
0.2 Greene
0.7 Webster
0.9 Wright
1 Texas
0.6 Shannon
0.8 Wayne
0.8 Scott
0.4 Newton
0.1 Christian
0.5 Douglas
0.9 Howell
0.8 Carter
0.4 Stoddard
1 Mississippi
1 McDonald
0.8 Barry
0.3 Stone
0.8 Taney
0.9 Ozark
0.6 Oregon
0.8 Ripley
0.9 Butler
1 New Madrid
1 Pemiscot
1 Dunklin

Priority Most Impacted Scoring Points

County	Damage Assessment %	SVI	Averaged	Ranking By County	Score*					Priority Points
					7.4	14.8	22.2	29.6	37	
Bollinger	0.35	0.50	0.43	12.00	1	0	0	0	0	**1**
Butler	0.90	0.90	0.90	31.00	1	1	1	1	0	**4**
Carter	6.13	0.80	3.47	37.00	1	1	1	1	1	**5**
Christian	0.07	0.10	0.09	2.00	0	0	0	0	0	**0**
Crawford	0.90	0.80	0.85	30.00	1	1	1	1	0	**4**
Dent	0.15	0.80	0.48	16.00	1	1	0	0	0	**2**
Douglas	0.76	0.50	0.63	22.00	1	1	0	0	0	**2**
Dunklin	0.12	1.00	0.56	19.00	1	1	0	0	0	**2**
Franklin	0.23	0.10	0.17	6.00	0	0	0	0	0	**0**
Gasconade	0.49	0.20	0.35	8.00	1	0	0	0	0	**1**
Green	0.06	0.20	0.13	4.00	0	0	0	0	0	**0**
Howell	1.77	0.90	1.34	36.00	1	1	1	1	0	**4**
Iron	0.32	0.90	0.61	21.00	1	1	0	0	0	**2**
Jasper	0.13	0.60	0.37	9.00	1	0	0	0	0	**1**
Jefferson	0.33	0.20	0.27	7.00	0	0	0	0	0	**0**
Laclede	0.00	0.90	0.45	13.00	1	0	0	0	0	**1**
Madison	0.79	0.40	0.60	20.00	1	1	0	0	0	**2**
Maries	0.44	0.50	0.47	15.00	1	1	0	0	0	**2**
McDonald	0.68	1.00	0.84	29.00	1	1	1	0	0	**3**
Morgan	0.00	0.90	0.45	13.00	1	0	0	0	0	**1**
Newton	1.18	0.40	0.79	27.00	1	1	1	0	0	**3**
Oregon	0.83	0.60	0.72	25.00	1	1	1	0	0	**3**
Osage	0.24	0.00	0.12	3.00	0	0	0	0	0	**0**
Ozark	1.57	0.90	1.24	34.00	1	1	1	1	0	**4**
Pemiscot	0.35	1.00	0.68	24.00	1	1	1	0	0	**3**
Phelps	0.22	0.60	0.41	11.00	1	0	0	0	0	**1**
Pulaski	0.38	0.70	0.54	18.00	1	1	0	0	0	**2**
Reynolds	1.66	0.60	1.13	33.00	1	1	1	1	0	**4**
Ripley	1.83	0.80	1.32	35.00	1	1	1	1	0	**4**
Shannon	1.42	0.60	1.01	32.00	1	1	1	1	0	**4**
Ste. Genevieve	0.04	0.10	0.07	1.00	0	0	0	0	0	**0**
St. Louis County	0.07	0.20	0.14	5.00	0	0	0	0	0	**0**
Stone	0.44	0.30	0.37	10.00	1	0	0	0	0	**1**
Taney	0.46	0.80	0.63	22.00	1	1	0	0	0	**2**
Texas	0.52	1.00	0.76	26.00	1	1	1	0	0	**3**
Wayne	0.78	0.80	0.79	27.00	1	1	1	0	0	**3**
Wright	0.12	0.90	0.51	17.00	1	1	0	0	0	**2**

* Score represents a 1/5 breakdown of the total 37 counties. Priority Points are determined by which quintile the county falls in based on Ranking.

Appendix F – Evaluation of Average Market Rates

<u>Pre-Disaster Housing – State</u>

American Community Survey (ACS) data for 2016[1] shows that Missouri has a total of 2,738,774 housing units; roughly 87% of those units are occupied leaving 366,412 vacant housing units. Missouri has a homeownership rate at 67% and a renter rate of 33%. Applying that ratio to the total number of vacant units statewide, the number of vacant rental units is reduced further; 2,091 vacant rental units, statewide. Comprehensive Housing Affordability Strategy (CHAS) and ACS data further demonstrates the need for affordable rental housing throughout Missouri. 43% of Missouri renters report that their current housing conditions are substandard, overcrowded, severely overcrowded, or their housing costs substantial. In addition, 63% of renter occupied units were built before 1980 and have children present. The age of these units present increased risk of lead paint exposure and other environmental concerns.

In 2015, the Public Policy Research Center, University of Missouri St. Louis (UMSL), published the MHDC Housing Needs Assessment Report for the state of Missouri. The report identified an affordability challenge for many Missouri households. According to the report, 25% the State's population earned $25,000 or less per year and 31% of the State's households were rent burdened. Renter households, in particular, low income renters, bore the majority of that burden. African Americans and Hispanics experienced the highest rate of rent burden, and households with a disabled family member were more likely to be rent burdened than other subpopulations. Interviews noted repeatedly that the cost of housing presented the most significant barrier to affordable housing in Missouri. National Low Income Housing Coalition's (NLIHC) Out of Reach 2017 concluded that many Missouri renters, both urban and rural, pay more of their income towards housing than is considered reasonable. 2016 ACS data shows the average gross rent for the state is $822. CHAS data shows that 106,375 low income renters (>30% to less than or = 50% HAMFI) pay more than 30% of their household income to housing and 35,845 pay more than 50% of their income towards housing. Missouri's extremely low income renters (less than or = 30% HAMFI) show higher rates of cost burden; with 153,155 households paying more than 30% of household income to housing and 126,135 paying more than half of their household income to housing.

MHDC's 2015 Housing Needs Assessment Report studied the state's housing markets and needs on a regional level. The report identified areas of concentration, defined as: 1. Regions that have "relatively high proportions of special needs populations (veterans, people with disabilities and the elderly) and 2. Whether regions experience one of more indicators of disadvantage in the form of poverty, low area median income, or unemployment." Based on these definitions the report found "nine regions where there are particularly high proportions" of special needs populations – Bolivar, Lake Ozark, Nevada, Poplar Bluff, Southwest, Bootheel, Northwest, South Central and Warrensburg. All of the zip codes targeted with CDBG-DR funding fall within one of the listed concentrated regions.

Data from MHDC's 2015 Housing Needs Assessment Report suggests that the supply of affordable housing does not meet the demand for such housing throughout the State. The 2015 report noted that "Statewide

[1] ACS data represents 5 year estimates – the most recent ACS data available and used in this report covers 2012-2016

there is a gap between the need for and supply of affordable housing. There are 149,000 publicly affordable units (Missouri) but 618,000 households below the 60% AMI, 342,000 renter households below 60% AMI, and 278,000 cost burdened renter households below 60% AMI. The scale of the gap between need and supply varies across urban and rural (Missouri) counties." The report explored a variety of conditions that exacerbate the gap between stable housing and low income households. "Whether or not they belong to a protected class, low income populations do not appear to have equal access to decent, safe, affordable housing, particularly where availability of housing is limited." Interviews conducted for the report indicate that in many of Missouri's non-entitlement counties, affordable and accessible housing is at a premium. "The problem lies in the fact that low income residents of rural Missouri face a rental housing market that is largely characterized by shortages and substandard conditions. Properties of better quality are beyond what low income individuals can afford. Under these conditions, the most vulnerable among Missouri's rural populations cannot afford the housing they might otherwise choose." This assessment clearly illustrates the need for quality affordable housing in rural areas, including the five zip codes associated with this CDBG-DR funding.

Pre-Disaster Housing – 65616

This zip code is located within Taney County, and includes the cities of Branson, Bull Creek Village, Gretna, Marvel Cave Park and Silver Dollar City.

ACS data for 2016 shows this zip code has 16,277 total housing units; 10,799 are occupied while 5,478 are vacant. The homeownership rate for the zip code is 47% (5,032), the renter rate stands at 53% (5,767). Of the total housing units, 39% are 1 unit-detached structures (6,318), the second most common housing unit, at 17%, are larger multi-dwelling structures (10 to 19 units - 233). The median rent for the zip code is $745, and 42% of renters within this zip code pay more than 30% of their household income towards rent.

Using data from proposals submitted to the Missouri Housing Development Commission (MHDC) for Low Income Housing Tax Credits (LIHTC) between 2015 and 2018, the need for affordable housing becomes more evident. Analysis of market studies submitted shows the poverty rate for the zip code consistently above 12%, income eligible households at 50%, 60% and 80% of AMI, and the absorption rate for the proposals estimated at no more than 4 months needed to lease up completely. Proposals were submitted for both family and senior / elderly developments and focused primarily on new construction while one sought to preserve a HUD affordable housing development for the elderly, built in 1981, 100% occupied with a waiting list. Branson experienced an EF-2 tornado on February 29, 2012; 37 properties suffered major damages or were destroyed, and 41 properties suffered minor to major damage[2], some of those properties included long term stay hotels used as rental housing for low and moderate income residents.

Pre-Disaster Housing – 65775

This zip code is located within Howell County, and includes the cities of West Plains, Rover, Arditta, White Church, Siloam Springs and Brandsville.

ACS data for 2016 shows this zip code has 11,155 total housing units; 10,125 are occupied while 1,030 are vacant. The homeownership rate for the zip code is 67% (6,828), the renter rate stands at 33% (3,297). Of the

[2] 2012 TANEY COUNTY, DRAFT, Multi-Jurisdictional Natural Hazard Mitigation Plan, 3-7

total housing units, 72% are 1 unit-detached structures (8,064), the second most common housing unit, at 15%, are mobile homes (1,646). The median rent for the zip code is $606, and 46% of renters within this zip code pay more than 30% of their household income towards rent.

Analysis of three market studies submitted to MHDC for LIHTCs between 2015 and 2018 shows a high poverty rate for the zip code (over 20%), income eligible households, and the absorption rate for the proposals estimated at between 5 and 8 months. Two proposals were submitted for senior / elderly developments and one was submitted for family housing; all proposals sought funds for new construction.

Pre-Disaster Housing – 64850

This zip code is located within Newton County, and includes the cities of Neosho, Monark Springs, Boulder City, Westview and McNatt.

ACS data for 2016 shows this zip code has 9,766 total housing units; 8,885 are occupied while 881 are vacant. The homeownership rate for the zip code is 66% (5,843), the renter rate stands at 34% (3,042). Of the total housing units, 79% are 1 unit-detached structures (7,720), the second most common housing unit, at 10%, are mobile homes (1,014). The median rent for the zip code is $631, and 45% of renters within this zip code pay more than 30% of their household income towards rent.

Analysis of three market studies submitted to MHDC for LIHTCs between 2015 and 2018 shows a poverty rate for the zip code consistently over 12%, income eligible households, and the absorption rate for the proposals estimated at between 2 and 7 months. Two proposals were submitted for newly constructed family developments and one was targeted to elderly residents.

Pre-Disaster Housing – 63935

This zip code is located within Ripley County, and includes the cities of Doniphan, Bardley, Poynor, Pratt, Bennett, Carie and Briar.

ACS data for 2016 shows this zip code has 4,670 total housing units; 3,799 are occupied while 871 are vacant. The homeownership rate for the zip code is 75% (2,866), the renter rate stands at 25% (933). Of the total housing units, 74% are 1 unit-detached structures (3,433), the second most common housing unit, at 21%, are mobile homes (966). The median rent for the zip code is $505, and 48% of renters within this zip code pay more than 30% of their household income towards rent.

In the period between 2015 and 2018, one proposal for new affordable housing was submitted to MHDC. The study cited a high poverty rate for the zip code (over 30%), an absorption rate of 3 to 5 months, and that the proposal would likely attract residents from other rent restricted development waiting lists.

Pre-Disaster Housing – 63965

This zip code is located within Carter County, and includes the cities of Van Buren, South Van Buren, House Creek, Eastwood, Garwood and Chicopee.

ACS data for 2016 shows this zip code has 1,633 total housing units; 1,264 are occupied while 369 are vacant. The homeownership rate for the zip code is 76% (963), the renter rate stands at 24% (301). Of the total housing units, 80% are 1 unit-detached structures (1,309), the second most common housing unit, at 14%, are mobile homes (233). The median rent for the zip code is $454, and 36% of renters within this zip code pay more than 30% of their household income towards rent.

Four of the five zip codes targeted with CDBG-DR funds are located within the regions cited in MHDC's 2015 Housing Needs Assessment Report as communities with high proportions of special needs populations (65616, 65775, 63965, and 63935) including veterans, adults living with disabilities and the elderly. The report ranks communities on a Special Needs Index, factoring in the special needs populations as well as the disadvantage indicators (poverty, unemployment and household income). All but one of the zip codes targeted with CDBG-DR funds are identified as highest need communities; 64850 is identified as a moderately high need community using the index. The 2016 State of the State, Poverty in Missouri data reports that the zip codes targeted with CDBG-DR funds, 65775, 63965 and 63935, have poverty rates above 20%; 65616 has a poverty rate of almost 19%, and 64850 has a poverty rate of 14%. Using the Social Vulnerability Index (SVI), 2010-2014, Hazards & Vulnerability Research Institute (HVRI) to compare each of the zip codes targeted with CDBG-DR funds, to the state's SVI rating, 65616 ranked as having high vulnerability, 63965 and 63935 as medium-high vulnerability, 65775 as medium, and finally, 64850 as having medium-low vulnerability. "Social vulnerability refers to the socioeconomic and demographic factors that affect the resilience of communities." Typically, factors include but are not limited to, poverty, age, disability, gender, language, and housing. Many best practices/ vulnerability studies factor in the disproportionate percentage of low income people who live in substandard housing when assessing their community's resiliency. The ability for a community to prepare for and recover from a disaster is tempered if a large portion of that community is housed in unstable, unsafe, or inaccessible locations. "Studies have shown that in disaster events the socially vulnerable are more likely to be adversely affected;"[3] elderly residents, disabled residents, and homeless residents personify this connection. Higher vulnerability suggests a lower resiliency for the community and its residents during and after a disaster.

Factoring in Continuum of Care (CoC) data, the zip codes targeted with CDBG-DR funds are located within two Missouri CoCs; the Balance of State comprised of 101 non-entitlement communities and the Joplin/Jasper and Newton counties CoC. Research from the Statewide Homelessness Study 2017, UMSL Public Policy Research Center can be used in the context of illustrating the need for affordable housing. For the Balance of State CoC which encompasses zip codes 65616, 65775, 63965 and 63935, the report cites "there are many low income households within the average median household income in the regions ranging from $21,000 to $26,500.

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[3] A Social Vulnerability Index for Disaster Management, Barry E. Flanagan, Edward W. Gregory, Elaine J. Hallisey, Janet L. Heitgerd, and Brian Lewis - *Journal of Homeland Security and Emergency Management, Volume* 8, *Issue* 1, 2011

The CoC faces challenges to serving its residents including the lack of affordable and safe rental housing."[4] For the remaining zip code, 64850, the report notes "In the aftermath of the 2011 tornado that affected Joplin, a high percentage of the housing stock was rebuilt. New buildings mean higher rents which has affected the stock of affordable housing in the CoC."[5] The report elaborates on the housing picture for the state, examining data over the period 2012 to 2016, finding "the number of owner-occupied units decreased by over 24,000 units and the number of renter-occupied units increased by over 37,000."[6] One of the impacts associated with this change is a rise in average rent for Missourians. 2016 ACS data confirms the upward trend, listing the statewide average gross rent in 2012 as $759, 2014 as $807 and in 2016, $822.

Consideration of this data supports the assertion that each of the communities targeted with CDBG-DR funds faced affordable housing challenges before the floods of 2017.

<u>Post Disaster Housing</u>

FEMA, July 2017, data[7] shows a total housing stock of 43,501 for the five zip codes targeted with CDBG-DR funds; 21,532 are owner occupied units and the remaining 21,969 are rental units. The data reports 788 total units affected by the flood, 576 owners and 212 renters. Identifying rental housing that is no longer available as a result of the 2017 floods can be reasonably accomplished using FEMA data, recognizing that the data comes from resident reporting and may not present a complete picture of damage sustained and households impacted. Taking that into account, FEMA data reveals that a total of 26 units were bought out post-flood, 14 were destroyed, and 34 reported major damage; 9% of the total affected units. The data shows the majority of impacted households were uninsured (742 households), and many reported living in precarious housing as of July 2017 (511 reported living in unsafe dwellings and 175 reported living in unsafe, damaged housing). Examination of the data suggests a large low income population in the zip codes targeted with CDBG-DR funds; 637 reporting very low income, 299 reporting low income and 229 reporting a moderate household income. Associating this data with the most recent ACS data from 2016, particularly the median rent and percentage of households paying more than 30% of their income towards rent for each zip code targeted with CDBG-DR funds, it is reasonable to conclude that the 2017 floods further exacerbated an existing shortage of affordable rental housing in these communities.

<u>Post-Disaster Housing – 65616</u>

FEMA data reports total rental stock for this zip code at 11,245. 19 renters were affected by the flood, 2 were destroyed, and 1 sustained major damage; no rental properties were bought out in this zip code according to FEMA data. 168 households reported very low household income, 79 identified as low income and 56 as moderate income households. 67 individuals were living in unsafe dwellings post-flood, 10 were living in unsafe, damaged homes, and 12 reported living in a motel/hotel.

[4] Statewide Homelessness Study 2017, UMSL Public Policy Research Center, p. 3
[5] Statewide Homelessness Study 2017, UMSL Public Policy Research Center, p. 23
[6] Statewide Homelessness Study 2017, UMSL Public Policy Research Center, p. 36
[7] FIDA_29026_FSA_4317

Post-Disaster Housing – 65775

FEMA data reports total rental stock for this zip code at 4,327. 84 renters were affected by the flood, 5 properties were bought out, 3 were destroyed, and 2 sustained major damage. 162 households reported very low household income, 76 identified as low income and 57 as moderate income households. 119 individuals were living in unsafe dwellings post-flood, 52 were living in unsafe, damaged homes, and 1 reported living in a motel/hotel.

Post-Disaster Housing – 64850

FEMA data reports total rental stock for this zip code at 3,923. 49 renters were affected by the flood, 1 was destroyed; no rental properties were bought out or majorly damaged according to FEMA data. 196 households reported very low household income, 75 identified as low income and 50 as moderate income households. 132 individuals were living in unsafe dwellings post-flood, 61 were living in unsafe, damaged homes, and 1 reported living in a motel/hotel.

Post-Disaster Housing – 63935

FEMA data reports total rental stock for this zip code at 1,804. 16 renters were affected by the flood, 12 properties were bought out, 6 were destroyed, and 7 sustained major damage. 35 households reported very low household income, 27 identified as low income and 37 as moderate income households. 72 individuals were living in unsafe dwellings post-flood, 20 were living in unsafe, damaged homes, and 2 reported living in a motel/hotel.

Post-Disaster Housing – 63965

FEMA data reports total rental stock for this zip code at 670. 44 renters were affected by the flood, 9 properties were bought out, 2 were destroyed, and 24 sustained major damage. 76 households reported very low household income, 42 identified as low income and 29 as moderate income households. 121 individuals were living in unsafe dwellings post-flood, 32 were living in unsafe, damaged homes, and 1 reported living in a motel/hotel.

Consideration of the data for the zip codes targeted with CDBG-DR funds, both pre and post disaster, indicates a stark picture of need. The availability of safe, affordable, rental housing was and remains, scarce in these areas. Any plan to rebuild communities must include new housing options for vulnerable individuals and families.

MHDC data estimates a cost-per-unit, for newly constructed, single family or duplex homes, in out-state Missouri at $178,860[8]. Data from the National Association of Home Builders[9] (NAHB) breaks down the costs of constructing single family homes and shows a consistent trend upward, meaning the cost since 2002 has increased each year. In 2017, the total construction cost breakdown according to this data was $237,760. Both estimates factor in labor, land, materials, and regulatory costs; both estimates have increased over the last three years, and both should be taken into account in any rebuilding plan for the impacted communities.

Estimating cost per unit for purposes of CDBG-DR housing recovery should begin with bridging the gap between the two data points, MHDC and NAHB. Utilizing a cost per unit of $200,000 offers a starting point for initial allocation. Assuming a $30,000,000 total housing allocation for the impacted zip codes, at $200,000 cost per unit, the total number of affordable units produced is 150. Assuming CDBG-DR funds leverage other sources for the production of affordable housing, such as but not limited to LIHTC and HOME[10], the total number of affordable units produced increases to 200 new units. The most recent FEMA data taken from July 2017 reveals a significant number of households living in precarious housing after the flood; 511 reported living in unsafe dwellings, 175 reported living in unsafe, damaged homes and 17 reported living in motel / hotel. At minimum, according to this data, 703 units of affordable housing is needed for these households alone. $30,000,000 in CDBG-DR funds, coupled with other state and federal sources, will allow the state to begin addressing the need for safe, decent, accessible, affordable housing in these communities.

All of the zip codes targeted with CDBG-DR funds show 1 unit, detached structures as the predominant housing option. All but one of the impacted zip codes, list mobile homes as the second most prevalent housing option. If the assumption is that rebuilding efforts must work to remake communities in a way that resembles what they were before a disaster, while strengthening the resiliency of that community, the most reasonable conclusion is that restoration of the affordable rental housing stock within these communities should begin primarily with single family homes or duplexes. Taney County (65616) is unique within these zip codes, the inclusion of Branson and Silver Dollar City means that this community is more densely populated than the other four and can support multi-dwelling structures as a viable rental option.

The 2016 flood aggravated an existing shortage of safe, accessible, affordable rental housing, within the zip codes impacted. The CDBG-DR funds will enable the state to begin tackling the need for affordable housing for some of Missouri's most vulnerable citizens.

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[8] Data reflects rent restricted units only, LIHTC units issued over a period of time, and LIHTC units issued in out-state Missouri / KC and STL developments are not included in estimate

[9] Data reflects general construction costs for single family homes / no rent restriction – National Association of Home Builders, Cost of Constructing a Home, December 2017, Special Study for HousingEconomics.com, Carmel Ford

[10] Leverage estimate is $10,000,000

U.S. DEPARTMENT OF HUD
STATE: MISSOURI

---------------- 2018 HOME PROGRAM RENTS ---------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Cape Girardeau, MO-IL MSA								
	LOW HOME RENT LIMIT	527	530	703	840	937	1034	1130
	HIGH HOME RENT LIMIT	527	530	703	1008	1119	1262	1364
	For Information Only:							
	FAIR MARKET RENT	527	530	703	1008	1119	1287	1455
	50% RENT LIMIT	566	606	727	840	937	1034	1130
	65% RENT LIMIT	715	768	923	1059	1161	1262	1364
Columbia, MO MSA								
	LOW HOME RENT LIMIT	543	616	759	993	1108	1223	1337
	HIGH HOME RENT LIMIT	543	616	759	1043	1337	1538	1738
	For Information Only:							
	FAIR MARKET RENT	543	616	759	1043	1337	1538	1738
	50% RENT LIMIT	668	716	860	993	1108	1223	1337
	65% RENT LIMIT	908	974	1171	1344	1480	1615	1749
McDonald County, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	467	530	641	826	891	1022	1102
	For Information Only:							
	FAIR MARKET RENT	467	530	641	826	891	1025	1158
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Jefferson City, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	414	495	644	930	941	1082	1223
	HIGH HOME RENT LIMIT	414	495	644	937	941	1082	1223
	For Information Only:							
	FAIR MARKET RENT	414	495	644	937	941	1082	1223
	50% RENT LIMIT	626	670	805	930	1037	1144	1251
	65% RENT LIMIT	800	859	1033	1184	1301	1417	1534
Callaway County, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	499	502	668	840	937	1034	1130
	HIGH HOME RENT LIMIT	499	502	668	957	1177	1333	1441
	For Information Only:							
	FAIR MARKET RENT	499	502	668	957	1177	1354	1530
	50% RENT LIMIT	566	606	727	840	937	1034	1130
	65% RENT LIMIT	754	809	973	1115	1225	1333	1441
Moniteau County, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	409	482	641	827	940	1037	1134
	HIGH HOME RENT LIMIT	409	482	641	827	994	1143	1292
	For Information Only:							
	FAIR MARKET RENT	409	482	641	827	994	1143	1292
	50% RENT LIMIT	567	608	730	842	940	1037	1134
	65% RENT LIMIT	744	798	959	1100	1208	1314	1420

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

U.S. DEPARTMENT OF HUD
STATE: MISSOURI

---------------- 2018 HOME PROGRAM RENTS ----------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Joplin, MO MSA								
	LOW HOME RENT LIMIT	496	531	638	737	822	908	992
	HIGH HOME RENT LIMIT	556	611	773	924	1011	1097	1184
	For Information Only:							
	FAIR MARKET RENT	556	611	773	1054	1106	1272	1438
	50% RENT LIMIT	496	531	638	737	822	908	992
	65% RENT LIMIT	625	671	808	924	1011	1097	1184
Kansas City, MO-KS HUD Metro FMR Area								
	LOW HOME RENT LIMIT	568	713	869	1040	1160	1280	1400
	HIGH HOME RENT LIMIT	568	713	869	1181	1340	1541	1742
	For Information Only:							
	FAIR MARKET RENT	568	713	869	1181	1340	1541	1742
	50% RENT LIMIT	700	750	900	1040	1160	1280	1400
	65% RENT LIMIT	926	994	1194	1372	1510	1648	1786
Bates County, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	479	482	636	735	820	904	988
	HIGH HOME RENT LIMIT	479	482	641	887	1025	1144	1235
	For Information Only:							
	FAIR MARKET RENT	479	482	641	887	1025	1179	1333
	50% RENT LIMIT	495	530	636	735	820	904	988
	65% RENT LIMIT	651	699	841	962	1054	1144	1235
St. Joseph, MO-KS MSA								
	LOW HOME RENT LIMIT	519	576	723	836	932	1029	1125
	HIGH HOME RENT LIMIT	519	576	739	953	1105	1271	1436
	For Information Only:							
	FAIR MARKET RENT	519	576	739	953	1105	1271	1437
	50% RENT LIMIT	563	603	723	836	932	1029	1125
	65% RENT LIMIT	751	806	969	1112	1220	1328	1436
St. Louis, MO-IL HUD Metro FMR Area								
	LOW HOME RENT LIMIT	609	692	865	998	1113	1229	1344
	HIGH HOME RENT LIMIT	609	692	896	1187	1388	1576	1707
	For Information Only:							
	FAIR MARKET RENT	609	692	896	1187	1388	1596	1804
	50% RENT LIMIT	672	720	865	998	1113	1229	1344
	65% RENT LIMIT	888	952	1144	1313	1445	1576	1707
Springfield, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	525	562	675	780	870	960	1050
	HIGH HOME RENT LIMIT	559	589	760	1044	1145	1245	1345
	For Information Only:							
	FAIR MARKET RENT	559	589	760	1105	1202	1382	1563
	50% RENT LIMIT	525	562	675	780	870	960	1050
	65% RENT LIMIT	706	758	912	1044	1145	1245	1345

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

U.S. DEPARTMENT OF HUD
STATE: MISSOURI

---------------- 2018 HOME PROGRAM RENTS ---------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Dallas County, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	465	497	597	690	770	850	929
	HIGH HOME RENT LIMIT	486	497	657	824	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	486	497	657	824	1157	1331	1504
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Polk County, MO HUD Metro FMR Area								
	LOW HOME RENT LIMIT	465	489	597	690	770	850	929
	HIGH HOME RENT LIMIT	481	489	650	888	971	1053	1135
	For Information Only:							
	FAIR MARKET RENT	481	489	650	945	1123	1291	1460
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	601	646	777	888	971	1053	1135
Adair County, MO								
	LOW HOME RENT LIMIT	439	482	641	793	885	976	1067
	HIGH HOME RENT LIMIT	439	482	641	909	1120	1217	1315
	For Information Only:							
	FAIR MARKET RENT	439	482	641	909	1129	1298	1468
	50% RENT LIMIT	533	571	686	793	885	976	1067
	65% RENT LIMIT	691	742	892	1022	1120	1217	1315
Atchison County, MO								
	LOW HOME RENT LIMIT	425	488	641	788	873	970	1060
	HIGH HOME RENT LIMIT	425	488	641	818	873	1004	1135
	For Information Only:							
	FAIR MARKET RENT	425	488	641	818	873	1004	1135
	50% RENT LIMIT	531	568	682	788	878	970	1060
	65% RENT LIMIT	698	749	901	1031	1131	1229	1327
Audrain County, MO								
	LOW HOME RENT LIMIT	450	511	636	735	820	904	988
	HIGH HOME RENT LIMIT	450	511	680	853	926	1065	1204
	For Information Only:							
	FAIR MARKET RENT	450	511	680	853	926	1065	1204
	50% RENT LIMIT	495	530	636	735	820	904	988
	65% RENT LIMIT	654	702	844	966	1059	1149	1240
Barry County, MO								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	507	515	641	865	873	1004	1103
	For Information Only:							
	FAIR MARKET RENT	507	515	641	870	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	585	628	756	865	945	1024	1103

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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---------------- 2018 HOME PROGRAM RENTS ----------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Barton County, MO								
	LOW HOME RENT LIMIT	425	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	558	641	820	960	1041	1121
	For Information Only:							
	FAIR MARKET RENT	425	558	641	820	1035	1190	1346
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	594	638	767	878	960	1041	1121
Benton County, MO								
	LOW HOME RENT LIMIT	465	491	597	690	770	850	929
	HIGH HOME RENT LIMIT	474	491	653	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	474	491	653	905	1019	1172	1325
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Butler County, MO								
	LOW HOME RENT LIMIT	431	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	431	508	675	846	932	1022	1102
	For Information Only:							
	FAIR MARKET RENT	431	508	675	846	932	1072	1212
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Camden County, MO								
	LOW HOME RENT LIMIT	449	520	625	721	805	888	971
	HIGH HOME RENT LIMIT	449	549	677	857	990	1074	1158
	For Information Only:							
	FAIR MARKET RENT	449	549	677	857	1172	1348	1524
	50% RENT LIMIT	486	520	625	721	805	888	971
	65% RENT LIMIT	613	658	791	905	990	1074	1158
Carroll County, MO								
	LOW HOME RENT LIMIT	425	482	641	804	913	1008	1102
	HIGH HOME RENT LIMIT	425	482	641	804	971	1117	1262
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	971	1117	1262
	50% RENT LIMIT	551	590	708	819	913	1008	1102
	65% RENT LIMIT	748	803	966	1107	1215	1322	1429
Carter County, MO								
	LOW HOME RENT LIMIT	410	483	597	690	770	850	929
	HIGH HOME RENT LIMIT	410	483	643	806	876	1007	1102
	For Information Only:							
	FAIR MARKET RENT	410	483	643	806	876	1007	1139
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Cedar County, MO								
	LOW HOME RENT LIMIT	428	485	597	690	770	850	929
	HIGH HOME RENT LIMIT	428	485	645	809	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	428	485	645	809	955	1098	1242
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Chariton County, MO								
	LOW HOME RENT LIMIT	425	491	641	741	827	912	997
	HIGH HOME RENT LIMIT	425	491	641	851	1080	1173	1266
	For Information Only:							
	FAIR MARKET RENT	425	491	641	851	1129	1298	1468
	50% RENT LIMIT	498	534	641	741	827	912	997
	65% RENT LIMIT	666	716	861	985	1080	1173	1266
Clark County, MO								
	LOW HOME RENT LIMIT	425	496	641	760	848	936	1023
	HIGH HOME RENT LIMIT	425	496	641	884	971	1117	1226
	For Information Only:							
	FAIR MARKET RENT	425	496	641	884	971	1117	1262
	50% RENT LIMIT	512	548	658	760	848	936	1023
	65% RENT LIMIT	646	694	834	955	1046	1136	1226
Cooper County, MO								
	LOW HOME RENT LIMIT	425	507	641	789	881	971	1062
	HIGH HOME RENT LIMIT	425	507	641	847	946	1088	1230
	For Information Only:							
	FAIR MARKET RENT	425	507	641	847	946	1088	1230
	50% RENT LIMIT	531	569	683	789	881	971	1062
	65% RENT LIMIT	743	797	958	1099	1206	1312	1418
Crawford County, MO								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	519	522	655	864	904	1022	1102
	For Information Only:							
	FAIR MARKET RENT	519	522	655	903	904	1040	1175
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Dade County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	873	1004	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Daviess County, MO								
	LOW HOME RENT LIMIT	425	503	603	696	777	858	938
	HIGH HOME RENT LIMIT	425	555	641	917	963	1088	1173
	For Information Only:							
	FAIR MARKET RENT	425	555	641	932	963	1107	1252
	50% RENT LIMIT	470	503	603	696	777	858	938
	65% RENT LIMIT	620	666	801	917	1003	1088	1173
Dent County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Douglas County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	932	1129	1298	1468
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Dunklin County, MO								
	LOW HOME RENT LIMIT	428	485	597	690	770	850	929
	HIGH HOME RENT LIMIT	428	485	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	428	485	641	901	1105	1271	1437
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Gasconade County, MO								
	LOW HOME RENT LIMIT	425	504	641	763	851	939	1027
	HIGH HOME RENT LIMIT	425	504	641	932	1125	1222	1320
	For Information Only:							
	FAIR MARKET RENT	425	504	641	932	1129	1298	1468
	50% RENT LIMIT	513	550	661	763	851	939	1027
	65% RENT LIMIT	694	744	896	1026	1125	1222	1320
Gentry County, MO								
	LOW HOME RENT LIMIT	425	482	617	712	795	877	959
	HIGH HOME RENT LIMIT	425	482	641	828	887	1020	1153
	For Information Only:							
	FAIR MARKET RENT	425	482	641	828	887	1020	1153
	50% RENT LIMIT	480	514	617	712	795	877	959
	65% RENT LIMIT	639	686	824	944	1034	1122	1210

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Grundy County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	888	971	1053	1135
	For Information Only:							
	FAIR MARKET RENT	425	482	641	932	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	601	646	777	888	971	1053	1135
Harrison County, MO								
	LOW HOME RENT LIMIT	425	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	501	667	836	908	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	501	667	836	908	1044	1180
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Henry County, MO								
	LOW HOME RENT LIMIT	447	522	627	724	808	891	974
	HIGH HOME RENT LIMIT	447	526	700	919	989	1091	1177
	For Information Only:							
	FAIR MARKET RENT	447	526	700	982	989	1137	1286
	50% RENT LIMIT	487	522	627	724	808	891	974
	65% RENT LIMIT	623	668	803	919	1006	1091	1177
Hickory County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	894	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Holt County, MO								
	LOW HOME RENT LIMIT	425	482	641	746	832	918	1004
	HIGH HOME RENT LIMIT	425	482	641	804	1021	1158	1250
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	1021	1174	1327
	50% RENT LIMIT	502	538	646	746	832	918	1004
	65% RENT LIMIT	659	707	851	974	1066	1158	1250
Howard County, MO								
	LOW HOME RENT LIMIT	454	516	686	914	948	1090	1232
	HIGH HOME RENT LIMIT	454	516	686	914	948	1090	1232
	For Information Only:							
	FAIR MARKET RENT	454	516	686	914	948	1090	1232
	50% RENT LIMIT	635	680	816	942	1051	1160	1268
	65% RENT LIMIT	806	866	1041	1194	1313	1429	1546

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Howell County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	1008	1159	1310
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Iron County, MO								
	LOW HOME RENT LIMIT	425	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	538	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	538	641	880	1129	1298	1468
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Johnson County, MO								
	LOW HOME RENT LIMIT	473	537	714	838	936	1032	1128
	HIGH HOME RENT LIMIT	473	537	714	1028	1209	1322	1429
	For Information Only:							
	FAIR MARKET RENT	473	537	714	1028	1209	1390	1572
	50% RENT LIMIT	565	605	726	838	936	1032	1128
	65% RENT LIMIT	748	803	966	1107	1215	1322	1429
Knox County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	890	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Laclede County, MO								
	LOW HOME RENT LIMIT	459	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	459	482	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	459	482	641	932	1060	1219	1378
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Lawrence County, MO								
	LOW HOME RENT LIMIT	409	496	597	690	770	850	929
	HIGH HOME RENT LIMIT	409	496	641	890	974	1056	1138
	For Information Only:							
	FAIR MARKET RENT	409	496	641	932	1089	1252	1416
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	603	647	778	890	974	1056	1138

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Lewis County, MO								
	LOW HOME RENT LIMIT	409	482	641	741	827	912	997
	HIGH HOME RENT LIMIT	409	482	641	848	971	1117	1226
	For Information Only:							
	FAIR MARKET RENT	409	482	641	848	971	1117	1262
	50% RENT LIMIT	498	534	641	741	827	912	997
	65% RENT LIMIT	646	694	834	955	1046	1136	1226
Linn County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	873	1004	1135
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	609	654	787	900	984	1067	1151
Livingston County, MO								
	LOW HOME RENT LIMIT	432	485	645	761	850	938	1025
	HIGH HOME RENT LIMIT	432	485	645	867	1080	1173	1266
	For Information Only:							
	FAIR MARKET RENT	432	485	645	867	1136	1306	1477
	50% RENT LIMIT	513	550	660	761	850	938	1025
	65% RENT LIMIT	666	716	861	985	1080	1173	1266
Macon County, MO								
	LOW HOME RENT LIMIT	409	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	409	482	641	870	873	1004	1135
	For Information Only:							
	FAIR MARKET RENT	409	482	641	870	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	614	659	792	906	991	1076	1159
Madison County, MO								
	LOW HOME RENT LIMIT	450	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	450	511	680	853	926	1022	1102
	For Information Only:							
	FAIR MARKET RENT	450	511	680	853	926	1065	1204
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Maries County, MO								
	LOW HOME RENT LIMIT	425	496	641	745	831	917	1002
	HIGH HOME RENT LIMIT	425	496	641	804	929	1068	1208
	For Information Only:							
	FAIR MARKET RENT	425	496	641	804	929	1068	1208
	50% RENT LIMIT	502	538	645	745	831	917	1002
	65% RENT LIMIT	664	713	857	982	1075	1168	1261

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Marion County, MO								
	LOW HOME RENT LIMIT	432	519	641	741	827	912	997
	HIGH HOME RENT LIMIT	432	519	652	877	888	1021	1154
	For Information Only:							
	FAIR MARKET RENT	432	519	652	877	888	1021	1154
	50% RENT LIMIT	498	534	641	741	827	912	997
	65% RENT LIMIT	658	706	849	972	1065	1157	1249
Mercer County, MO								
	LOW HOME RENT LIMIT	425	482	602	695	776	856	936
	HIGH HOME RENT LIMIT	425	482	641	861	960	1041	1121
	For Information Only:							
	FAIR MARKET RENT	425	482	641	861	971	1117	1262
	50% RENT LIMIT	468	501	602	695	776	856	936
	65% RENT LIMIT	594	638	767	878	960	1041	1121
Miller County, MO								
	LOW HOME RENT LIMIT	445	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	445	572	671	843	914	1022	1102
	For Information Only:							
	FAIR MARKET RENT	445	572	671	843	914	1051	1188
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Mississippi County, MO								
	LOW HOME RENT LIMIT	429	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	429	505	672	843	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	429	505	672	843	1018	1171	1323
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Monroe County, MO								
	LOW HOME RENT LIMIT	425	482	641	753	840	926	1013
	HIGH HOME RENT LIMIT	425	482	641	804	1075	1168	1261
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	1129	1298	1468
	50% RENT LIMIT	507	543	652	753	840	926	1013
	65% RENT LIMIT	664	713	857	982	1075	1168	1261
Montgomery County, MO								
	LOW HOME RENT LIMIT	428	486	597	690	770	850	929
	HIGH HOME RENT LIMIT	428	486	646	853	880	1012	1121
	For Information Only:							
	FAIR MARKET RENT	428	486	646	853	880	1012	1144
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	594	638	767	878	960	1041	1121

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Morgan County, MO								
	LOW HOME RENT LIMIT	430	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	430	507	674	864	918	1022	1102
	For Information Only:							
	FAIR MARKET RENT	430	507	674	868	918	1056	1193
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
New Madrid County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	877	1009	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	877	1009	1140
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Nodaway County, MO								
	LOW HOME RENT LIMIT	437	512	667	771	860	949	1037
	HIGH HOME RENT LIMIT	437	512	681	898	1071	1224	1322
	For Information Only:							
	FAIR MARKET RENT	437	512	681	898	1071	1232	1392
	50% RENT LIMIT	520	556	667	771	860	949	1037
	65% RENT LIMIT	695	746	897	1027	1126	1224	1322
Oregon County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	864	873	1004	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	870	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Ozark County, MO								
	LOW HOME RENT LIMIT	425	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	518	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	518	641	879	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Pemiscot County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	858	877	1009	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	858	877	1009	1140
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Perry County, MO								
	LOW HOME RENT LIMIT	444	515	670	850	948	1046	1144
	HIGH HOME RENT LIMIT	444	515	670	946	1180	1349	1459
	For Information Only:							
	FAIR MARKET RENT	444	515	670	946	1180	1357	1534
	50% RENT LIMIT	572	613	736	850	948	1046	1144
	65% RENT LIMIT	763	819	984	1129	1240	1349	1459
Pettis County, MO								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	553	558	721	929	982	1102	1189
	For Information Only:							
	FAIR MARKET RENT	553	558	721	978	982	1129	1277
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	628	674	811	929	1016	1102	1189
Phelps County, MO								
	LOW HOME RENT LIMIT	448	527	632	730	815	899	983
	HIGH HOME RENT LIMIT	448	531	703	901	1075	1168	1261
	For Information Only:							
	FAIR MARKET RENT	448	531	703	901	1174	1350	1526
	50% RENT LIMIT	492	527	632	730	815	899	983
	65% RENT LIMIT	664	713	857	982	1075	1168	1261
Pike County, MO								
	LOW HOME RENT LIMIT	425	521	626	723	806	890	973
	HIGH HOME RENT LIMIT	425	547	641	932	940	1081	1221
	For Information Only:							
	FAIR MARKET RENT	425	547	641	932	940	1081	1222
	50% RENT LIMIT	487	521	626	723	806	890	973
	65% RENT LIMIT	644	691	832	952	1043	1131	1221
Pulaski County, MO								
	LOW HOME RENT LIMIT	527	565	677	783	873	963	1053
	HIGH HOME RENT LIMIT	538	660	812	1042	1143	1242	1341
	For Information Only:							
	FAIR MARKET RENT	538	660	812	1181	1430	1645	1859
	50% RENT LIMIT	527	565	677	783	873	963	1053
	65% RENT LIMIT	704	756	909	1042	1143	1242	1341
Putnam County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	908	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102

For all HOME projects, the maximum allowable rent is the HUD calculated High HOME Rent Limit and/or Low HOME Rent Limit.

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---------------- 2018 HOME PROGRAM RENTS ---------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Ralls County, MO								
	LOW HOME RENT LIMIT	462	524	663	766	855	943	1030
	HIGH HOME RENT LIMIT	462	524	697	874	1056	1192	1287
	For Information Only:							
	FAIR MARKET RENT	462	524	697	874	1056	1214	1373
	50% RENT LIMIT	516	553	663	766	855	943	1030
	65% RENT LIMIT	678	727	874	1001	1098	1192	1287
Randolph County, MO								
	LOW HOME RENT LIMIT	426	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	426	548	643	874	924	1063	1201
	For Information Only:							
	FAIR MARKET RENT	426	548	643	874	924	1063	1201
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	636	683	822	941	1030	1118	1207
Reynolds County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Ripley County, MO								
	LOW HOME RENT LIMIT	425	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	518	641	804	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	518	641	804	1129	1298	1468
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
St. Clair County, MO								
	LOW HOME RENT LIMIT	425	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	509	641	831	873	1004	1102
	For Information Only:							
	FAIR MARKET RENT	425	509	641	831	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Ste. Genevieve County, MO								
	LOW HOME RENT LIMIT	439	545	663	811	905	998	1092
	HIGH HOME RENT LIMIT	439	545	663	936	1004	1155	1305
	For Information Only:							
	FAIR MARKET RENT	439	545	663	936	1004	1155	1305
	50% RENT LIMIT	546	585	702	811	905	998	1092
	65% RENT LIMIT	690	741	891	1020	1119	1216	1313

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---------------- 2018 HOME PROGRAM RENTS ----------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
St. Francois County, MO								
	LOW HOME RENT LIMIT	472	482	607	701	782	863	943
	HIGH HOME RENT LIMIT	479	482	641	878	960	1041	1121
	For Information Only:							
	FAIR MARKET RENT	479	482	641	909	990	1139	1287
	50% RENT LIMIT	472	506	607	701	782	863	943
	65% RENT LIMIT	594	638	767	878	960	1041	1121
Saline County, MO								
	LOW HOME RENT LIMIT	439	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	439	498	662	875	936	1037	1117
	For Information Only:							
	FAIR MARKET RENT	439	498	662	884	936	1076	1217
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	593	636	766	875	956	1037	1117
Schuyler County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	896	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	896	1030	1165
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Scotland County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	804	971	1076	1159
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	971	1117	1262
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	614	659	792	906	991	1076	1159
Scott County, MO								
	LOW HOME RENT LIMIT	420	491	597	690	770	850	929
	HIGH HOME RENT LIMIT	420	491	641	875	955	1056	1138
	For Information Only:							
	FAIR MARKET RENT	420	491	641	875	955	1098	1242
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	603	647	778	890	974	1056	1138
Shannon County, MO								
	LOW HOME RENT LIMIT	409	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	409	482	641	804	915	1022	1102
	For Information Only:							
	FAIR MARKET RENT	409	482	641	804	915	1052	1190
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102

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---------------- 2018 HOME PROGRAM RENTS ----------------------

	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Shelby County, MO								
	LOW HOME RENT LIMIT	425	487	618	715	797	880	962
	HIGH HOME RENT LIMIT	425	487	641	854	1006	1118	1207
	For Information Only:							
	FAIR MARKET RENT	425	487	641	854	1006	1157	1308
	50% RENT LIMIT	481	515	618	715	797	880	962
	65% RENT LIMIT	636	683	822	941	1030	1118	1207
Stoddard County, MO								
	LOW HOME RENT LIMIT	425	482	601	694	775	855	934
	HIGH HOME RENT LIMIT	425	482	641	808	873	1004	1135
	For Information Only:							
	FAIR MARKET RENT	425	482	641	808	873	1004	1135
	50% RENT LIMIT	467	501	601	694	775	855	934
	65% RENT LIMIT	636	683	822	941	1030	1118	1207
Stone County, MO								
	LOW HOME RENT LIMIT	455	500	600	693	773	853	932
	HIGH HOME RENT LIMIT	455	545	687	882	964	1045	1126
	For Information Only:							
	FAIR MARKET RENT	455	545	687	891	993	1142	1291
	50% RENT LIMIT	467	500	600	693	773	853	932
	65% RENT LIMIT	596	641	771	882	964	1045	1126
Sullivan County, MO								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	467	530	705	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	467	530	705	884	960	1104	1248
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Taney County, MO								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	527	593	713	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	527	593	713	990	1024	1178	1331
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Texas County, MO								
	LOW HOME RENT LIMIT	409	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	409	482	641	864	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	409	482	641	930	1100	1265	1430
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102

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	PROGRAM	EFFICIENCY	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Vernon County, MO								
	LOW HOME RENT LIMIT	460	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	460	523	695	878	947	1041	1121
	For Information Only:							
	FAIR MARKET RENT	460	523	695	882	947	1089	1231
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	594	638	767	878	960	1041	1121
Washington County, MO								
	LOW HOME RENT LIMIT	465	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	473	482	641	804	873	1004	1102
	For Information Only:							
	FAIR MARKET RENT	473	482	641	804	873	1004	1135
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Wayne County, MO								
	LOW HOME RENT LIMIT	465	498	597	690	770	850	929
	HIGH HOME RENT LIMIT	477	521	641	804	880	1012	1102
	For Information Only:							
	FAIR MARKET RENT	477	521	641	804	880	1012	1144
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102
Worth County, MO								
	LOW HOME RENT LIMIT	425	482	641	742	828	914	999
	HIGH HOME RENT LIMIT	425	482	641	804	971	1117	1207
	For Information Only:							
	FAIR MARKET RENT	425	482	641	804	971	1117	1262
	50% RENT LIMIT	500	535	642	742	828	914	999
	65% RENT LIMIT	636	683	822	941	1030	1118	1207
Wright County, MO								
	LOW HOME RENT LIMIT	425	482	597	690	770	850	929
	HIGH HOME RENT LIMIT	425	482	641	834	944	1022	1102
	For Information Only:							
	FAIR MARKET RENT	425	482	641	834	963	1107	1252
	50% RENT LIMIT	465	498	597	690	770	850	929
	65% RENT LIMIT	584	627	754	864	944	1022	1102