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

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.

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<th>Peak Stage</th>
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<td>Sac River near Caplinger Mills</td>
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<td>Black River at Poplar Bluff</td>
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<tr>
<td>Jacks Fork at Eminence</td>
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<tr>
<td>Current River at Van Buren</td>
<td>37.42</td>
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<td>Yes</td>
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</tbody>
</table>
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

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 houses 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 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.

This Action Plan outlines the use of those CDBG disaster funds in a manner that directly addresses the unmet need. The focus initially is on housing, as required in the Federal Register, and 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

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<th>Category</th>
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<th>Allocation</th>
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<td>$2,926,750</td>
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<tr>
<td>Planning</td>
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<td>$1,500,000</td>
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</tr>
<tr>
<td>Public Service</td>
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<td>$1,525,000</td>
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<tr>
<td>Housing</td>
<td>Voluntary Local Buyout and Acquisition Program</td>
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<td></td>
<td>Homeownership and Tenant Assistance Program</td>
<td>$11,750,000</td>
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<tr>
<td></td>
<td>Affordable Multi-Family Rental Recovery</td>
<td>$18,258,250</td>
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<tr>
<td></td>
<td>New Construction Single Family</td>
<td>$2,000,000</td>
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<td>Vulnerable Population Unmet Needs</td>
<td>$3,075,000</td>
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<td>Total Funds Allocated</td>
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<td>$58,535,000</td>
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Section One — Introduction
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. 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 of the combined total awarded to the state will go to the most impacted and distressed counties. All the allocated funds must be used for eligible disaster-related activities. 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
  o Destroyed 396
  o Major Damage 848
  o Minor Damage 477
  o 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
  o 283 with major damage estimated at $38,100,000
  o 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:

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<th>Individual Assistance</th>
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Section Two: Missouri Disaster Recovery
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 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.

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 resources
• 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:
Section Three - Overall Storm Impact
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.

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% different 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.

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.
<table>
<thead>
<tr>
<th>Factor</th>
<th>Declared Counties</th>
<th>Missouri</th>
<th>United States</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>POPULATION</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Population, percent change — 4-1-2010 to 7-1-2017</td>
<td>1.34%</td>
<td>2.10%</td>
<td>5.50%</td>
</tr>
<tr>
<td><strong>AGE AND SEX</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Persons under 5 years, percent</td>
<td>5.92%</td>
<td>6.10%</td>
<td>6.10%</td>
</tr>
<tr>
<td>Persons 65 years and over, percent</td>
<td>19.23%</td>
<td>16.50%</td>
<td>15.60%</td>
</tr>
<tr>
<td><strong>HOUSING</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing units, July 1, 2017, (V2017)</td>
<td>1,466,509</td>
<td>2,792,506</td>
<td>137,403,460</td>
</tr>
<tr>
<td>Owner-occupied housing unit rate, 2012-2016</td>
<td>71.09%</td>
<td>66.80%</td>
<td>63.60%</td>
</tr>
<tr>
<td>Median value of owner-occupied housing units, 2012-2016</td>
<td>$103,000</td>
<td>$141,200</td>
<td>$184,700</td>
</tr>
<tr>
<td>Median selected monthly owner costs - with a mortgage, 2012-2016</td>
<td>$947</td>
<td>$1,210</td>
<td>$1,491</td>
</tr>
<tr>
<td>Median selected monthly owner costs - without a mortgage, 2012-2016</td>
<td>$329</td>
<td>$407</td>
<td>$462</td>
</tr>
<tr>
<td>Median gross rent, 2012-2016</td>
<td>$600</td>
<td>$759</td>
<td>$949</td>
</tr>
<tr>
<td>Building permits, 2017</td>
<td>8,853</td>
<td>18,811</td>
<td>1,281,977</td>
</tr>
<tr>
<td><strong>FAMILIES AND LIVING ARRANGEMENTS</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Households, 2012-2016</td>
<td>1,245,689</td>
<td>2,372,506</td>
<td>137,403,460</td>
</tr>
<tr>
<td>Persons per household, 2012-2016</td>
<td>2.52</td>
<td>2.48</td>
<td>2.64</td>
</tr>
<tr>
<td>Living in same house 1 year ago, percent of persons age 1 year+, 2012-2016</td>
<td>84.69%</td>
<td>84.00%</td>
<td>85.20%</td>
</tr>
<tr>
<td>Language other than English spoken at home, percent of persons age 5 years+, 2012-2016</td>
<td>3.65%</td>
<td>6.00%</td>
<td>21.10%</td>
</tr>
<tr>
<td><strong>EDUCATION (2012-2016)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High school graduate or higher, &gt;25 years old</td>
<td>83.52%</td>
<td>88.80%</td>
<td>87.00%</td>
</tr>
<tr>
<td>Bachelor’s degree or higher, &gt;25 years old</td>
<td>16.67%</td>
<td>27.60%</td>
<td>30.30%</td>
</tr>
<tr>
<td><strong>HEALTH</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>With a disability, under age 65 years, 2012-2016</td>
<td>14.39%</td>
<td>10.40%</td>
<td>8.60%</td>
</tr>
<tr>
<td>Persons without health insurance, under age 65 years, percent</td>
<td>13.37%</td>
<td>10.80%</td>
<td>10.20%</td>
</tr>
<tr>
<td><strong>ECONOMY</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>In civilian labor force, total, percent of population age 16 years+, 2012-2016</td>
<td>55.79%</td>
<td>62.90%</td>
<td>63.10%</td>
</tr>
<tr>
<td>Total manufacturers’ shipments, 2012 ($1,000)</td>
<td>47,285,681</td>
<td>111,535,362</td>
<td>5,696,729,632</td>
</tr>
<tr>
<td>Total merchant wholesaler sales, 2012 ($1,000)</td>
<td>49,442,871</td>
<td>91,916,351</td>
<td>5,208,023,478</td>
</tr>
<tr>
<td>Total retail sales, 2012 ($1,000)</td>
<td>54,903,912</td>
<td>90,546,581</td>
<td>4,219,821,871</td>
</tr>
<tr>
<td>Total retail sales per capita, 2012</td>
<td>$ 11,118</td>
<td>$15,036</td>
<td>$13,443</td>
</tr>
<tr>
<td><strong>TRANSPORTATION (2012-2016)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mean travel time to work (minutes), workers 16 years+</td>
<td>24.06</td>
<td>23.4</td>
<td>26.1</td>
</tr>
<tr>
<td>Median household income (in 2016 dollars)</td>
<td>$ 38,846</td>
<td>$49,593</td>
<td>$55,322</td>
</tr>
<tr>
<td><strong>INCOME AND POVERTY (2012-2016)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Per capita income in past 12 months (in 2016 dollars),</td>
<td>$ 20,424</td>
<td>$27,044</td>
<td>$29,029</td>
</tr>
<tr>
<td>Persons in poverty, percent</td>
<td>18.53%</td>
<td>13.40%</td>
<td>12.30%</td>
</tr>
<tr>
<td><strong>BUSINESSES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total employer establishments, 2016</td>
<td>87,229</td>
<td>160,112</td>
<td>7,757,007</td>
</tr>
<tr>
<td>Total employment, 2016</td>
<td>1,304,185</td>
<td>2,494,720</td>
<td>126,722,238</td>
</tr>
<tr>
<td>Total annual payroll, 2016 ($1,000)</td>
<td>57,299,020</td>
<td>112,072,115</td>
<td>6,435,142,055</td>
</tr>
<tr>
<td>Total employment, percent change, 2015-2016</td>
<td>1%</td>
<td>2.10%</td>
<td>2.10%</td>
</tr>
</tbody>
</table>

Note: Cells highlighted in green indicate an important difference between the statewide data and the subset of declared counties that are covered under the allocation. Information from US Census Bureau
Section Four — Impact and Unmet Needs Assessment
General Impact

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.

<table>
<thead>
<tr>
<th>Missouri 4317-DR</th>
<th>HOUSING</th>
<th>INFRASTRUCTURE</th>
<th>ECONOMIC REVITALIZATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESTIMATED UNMET NEED</td>
<td>$103,912,982</td>
<td>$28.4 - $91,144,144</td>
<td>$142,571,947</td>
</tr>
</tbody>
</table>

The combination of these two sources makes up the estimated unmet needs in the three categories of Housing, Economic Revitalization and Infrastructure.
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. Two counties were added to the list that were not initially assessed (Barry, Barton) and four counties were removed from the list and denied for Individual Assistance (Laclede, Morgan, Ste. Genevieve, Perry). These numbers were refined to make up the request for Individual Assistance.

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.
## 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 Disaster funding must comply with Title VI of the Civil Rights Act of 1964.
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:

<table>
<thead>
<tr>
<th>Vulnerability</th>
<th>Owner-occupied</th>
<th>Renter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupied by 62 and older and living alone</td>
<td>326</td>
<td>24</td>
</tr>
<tr>
<td>Occupied by persons with disabilities</td>
<td>48</td>
<td>14</td>
</tr>
<tr>
<td>Occupied by persons with no reported income</td>
<td>117</td>
<td>98</td>
</tr>
<tr>
<td>Occupied by persons with less than 30% MHI</td>
<td>404</td>
<td>293</td>
</tr>
<tr>
<td>TOTAL</td>
<td>895</td>
<td>429</td>
</tr>
</tbody>
</table>

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 indicated 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 Continua 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 and 10.
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**

<table>
<thead>
<tr>
<th>Balance of CoC Region</th>
<th>Number of Sheltered and Unsheltered Homeless People by Region</th>
<th>Number of Sheltered and Unsheltered Homeless Households by Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>61</td>
<td>45</td>
</tr>
<tr>
<td>2</td>
<td>12</td>
<td>12</td>
</tr>
<tr>
<td>5</td>
<td>439</td>
<td>325</td>
</tr>
<tr>
<td>6</td>
<td>78</td>
<td>53</td>
</tr>
<tr>
<td>7</td>
<td>88</td>
<td>77</td>
</tr>
<tr>
<td>8</td>
<td>71</td>
<td>48</td>
</tr>
<tr>
<td>9</td>
<td>60</td>
<td>44</td>
</tr>
<tr>
<td>10</td>
<td>154</td>
<td>101</td>
</tr>
</tbody>
</table>

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.
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 amalgamating 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.

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 and renters with personal property verified loss. 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). 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 | $117 | 
|------------------------------------------|-----|---------|
| Units with applicable level PPA, verified | 96  | $16,500.00 |
| Minor Low Value  (5-20% of 5,000) multiplier | 12  | $18,000.00 |
| Minor High Value (20-50% of 5,000) multiplier | 20  | $30,600.00 |
| Major Low Value (50-80% of 5,000) multiplier | 24  | $1,597,980.00 |
| Major High Value (80-100% of 5,000) multiplier | 9  | $908,520.00 |
| Severe (110% or more) | 9  | $3,846,560.00 |

Total Units with applicable PPA | 1451 | $2,350,000.00 |
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.

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 = 621
(estimated 50% of homeless persons impacted by flooding event)
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.

<table>
<thead>
<tr>
<th>Organization</th>
<th>Services Offered</th>
<th>Languages</th>
</tr>
</thead>
</table>
| Catholic Charities Southern Missouri - Joplin Branch | - 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: ccaastlc.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 | - Financial Management/Budget Counseling  
- Financial, Budgeting, and Credit Workshops | - 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 have been identified and assessed for assistance.

The first prong is to reach out to known partners that work every day to assist persons with special needs 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 Continua 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, 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 great 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.

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.

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 |
|-------------------------------------------------|---------------------------------|-----------------------------------|
| County                                          | Infrastructure Amount           | County                            |
| Barry                                           | $0                              | McDonald                          |
| Barton                                          | $0                              | Miller                            |
| Bollinger                                       | $0                              | Morgan                            |
| Boone                                           | $0                              | New Madrid                        |
| Butler                                          | $0                              | Newton                            |
| Camden                                          | $229,505                        | Oregon                            |
| Cape Girardeau                                  | $3,137,500                      | Ozark                             |
| Carter                                          | $346,336                        | Osage                             |
| Cedar                                           | $16,898                         | Perry                             |
| Cole                                            | $0                              | Phelps                            |
| Crawford                                        | $0                              | Pike                              |
| Dade                                            | $0                              | Pulaski                           |
| Dallas                                          | $0                              | Ralls                             |
| Dent                                            | $525,000                        | Reynolds                          |
| Douglas                                         | $2,025,000                      | Ripley                            |
| Dunklin                                         | $356,718                        | Scott                             |
| Franklin                                        | $0                              | Shannon                           |
| Gasconade                                       | $6,000                          | St. Louis County                  |
| Green                                           | $0                              | St. Genevieve                     |
| Howell                                          | $3,945,000                      | Stone                             |
| Iron                                            | $0                              | Taney                             |
| Jasper                                          | $20,000                         | Texas                             |
| Jefferson                                       | $0                              | Washington                        |
| Lawrence                                        | $0                              | Wayne                             |
| Madison                                         | $0                              | Webster                           |
| Maries                                          | $75,000                         | Wright                            |
| **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.

<table>
<thead>
<tr>
<th>Category</th>
<th>Verified Amount</th>
<th>Average Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>RE Reconstruction – 167 Properties</td>
<td>$13,793,833</td>
<td>$82,597</td>
</tr>
<tr>
<td>RE Repairs – 167 Properties</td>
<td>$12,626,484</td>
<td>$75,607</td>
</tr>
<tr>
<td>Combined Amounts</td>
<td>$26,420,317</td>
<td>$158,204</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
<th>Average</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>SBA Applicants with a Verified Loss</td>
<td>167</td>
<td>$158,205</td>
<td>$26,420,317</td>
</tr>
<tr>
<td>SBA Applicants without a Verified Loss</td>
<td>773</td>
<td>$158,205</td>
<td>$122,292,465</td>
</tr>
<tr>
<td><strong>Total Unmet Economic Need</strong></td>
<td></td>
<td></td>
<td>$148,712,782</td>
</tr>
<tr>
<td>Less SBA Loans Approved</td>
<td></td>
<td>($3,656,400)</td>
<td></td>
</tr>
<tr>
<td>NFIP Claims — Business</td>
<td></td>
<td>($2,484,435)</td>
<td></td>
</tr>
<tr>
<td><strong>Total Unmet Economic Need</strong></td>
<td></td>
<td></td>
<td>$142,571,947</td>
</tr>
</tbody>
</table>

**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 region’s 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.

Second, 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 lesser 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.

And 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
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).

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
And, the remaining 20% of the funds 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. Additional priority points will address most impacted communities outside of the established zip codes above, by measuring a combination of the county damaged occupied housing units as a percent of total occupied housing units and a county Social Vulnerability Index. Each of the two county measures will be divided into quintiles. Each county will be assigned a value 1-5 based upon which quintile their score
falls. The two scores will be averaged which will result in the points added to their respective application. Total possible priority points is 5.

**Eligible Applicants**
City and County governments 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 Funding will be available to all interested parties. 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.

**Training and Technical Assistance**
The complexity associated with using CDBG 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:

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Definition</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unmet Need</td>
<td>The extent to which there is quantified unmet need identified in the project area</td>
<td>0-25 points</td>
</tr>
<tr>
<td>Impact</td>
<td>The extent to which application activities will directly address unmet need</td>
<td>0-25 points</td>
</tr>
<tr>
<td>Project Readiness</td>
<td>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, executed agreements with sub-applicants and sub-recipients</td>
<td>0-20 points</td>
</tr>
<tr>
<td>Priority Partners/Organizational Capacity/Experience</td>
<td>The existence of Community Action Agencies and Regional Planning Commissions/Councils of Government incorporated by contract into the project team.</td>
<td>0-10 points</td>
</tr>
<tr>
<td>Priority Most Impacted</td>
<td>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 Priority Most Impacted County chart)</td>
<td>0-5 points</td>
</tr>
<tr>
<td>Local Effort</td>
<td>Percent of financial and in-kind participation</td>
<td>0-5 points</td>
</tr>
<tr>
<td>Consistency with Hazard Mitigation or other Local Recovery Plan and Resilience building components</td>
<td>Project identification in plan or project consistency with plan</td>
<td>0-10 points</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td>100 points</td>
</tr>
</tbody>
</table>

**CDBG-DR Program National Objectives**

1. **OVERALL REQUIREMENTS:**
   a. 80% 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)
c. 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

d. 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.
   c. Mitigate risk and hazards due potentially related to future natural disasters.
# Program Budget and Maximum Assistance Amounts for Beneficiaries

<table>
<thead>
<tr>
<th>Category</th>
<th>Program</th>
<th>Total Allocation</th>
<th>% of Total Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Maximum</strong></td>
<td><strong>$58,535,000</strong></td>
<td></td>
</tr>
<tr>
<td>Administration</td>
<td><strong>$2,926,750</strong></td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Planning</td>
<td><strong>$1,500,000</strong></td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Public Service</td>
<td><strong>Vulnerable Population Unmet Needs</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>* Rapid Rehousing</td>
<td><strong>$800,000.00</strong></td>
<td>1.5%</td>
</tr>
<tr>
<td></td>
<td>* Case Management Services / Homeless</td>
<td><strong>$225,000.00</strong></td>
<td>0.5%</td>
</tr>
<tr>
<td></td>
<td>* Case Management Services / Housing</td>
<td><strong>$500,000.00</strong></td>
<td>1%</td>
</tr>
<tr>
<td>Housing</td>
<td><strong>Voluntary Local Buyout and Acquisition Program</strong></td>
<td><strong>$17,500,000</strong></td>
<td>20%</td>
</tr>
<tr>
<td></td>
<td>* Residential Buyout and Demolition</td>
<td></td>
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<tr>
<td></td>
<td>* Relocation Assistance Program</td>
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<tr>
<td></td>
<td>* Tenant Relocation Assistance</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td><strong>Homeownership and Renter Assistance Program</strong></td>
<td><strong>$11,750,000</strong></td>
<td>31%</td>
</tr>
<tr>
<td></td>
<td>* Rehabilitation - Inside 100-year Floodplain</td>
<td></td>
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<td></td>
<td>* Rehabilitation - Outside 100-year Floodplain</td>
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<tr>
<td></td>
<td>* Reconstruction - Outside 100-year floodplain</td>
<td></td>
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<tr>
<td></td>
<td>* Tenant Relocation Assistance</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td><strong>Affordable Multi-Family Rental Recovery</strong></td>
<td><strong>$18,258,250.00</strong></td>
<td>31%</td>
</tr>
<tr>
<td></td>
<td>* New Multi-Family Housing paired with LIHTC</td>
<td><strong>$2,000,000</strong></td>
<td>3%</td>
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<tr>
<td></td>
<td><strong>New Construction Single Family</strong></td>
<td><strong>$2,000,000</strong></td>
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<tr>
<td></td>
<td>* Infill Housing for Affordable Homes</td>
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<tr>
<td></td>
<td><strong>Vulnerable Population Unmet Needs</strong></td>
<td><strong>$3,075,000.00</strong></td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>* Construction / Rehabilitation</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td><strong>Total Funds Allocated</strong></td>
<td><strong>$58,535,000.00</strong></td>
<td>100.00%</td>
</tr>
</tbody>
</table>

**Categorical Adjustment** - The Department of Economic Development retains the ability to transfer up to 25% of the total CDBG-DR allocation for use as needed among categories. An adjustment of more than 25% of the total allocation, or the creation/elimination of a category will require a substantial amendment of this plan.
## Program Budget, 80/20 Split and Percent of Low- and Moderate-Income Persons

<table>
<thead>
<tr>
<th>Category</th>
<th>Program</th>
<th>Most Impacted Areas (80%)</th>
<th>Most Impacted Areas (20%)</th>
<th>Total Allocation</th>
<th>LMI Amount (70% of Total Allocation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>$2,341,400</td>
<td>$585,350</td>
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<td>$500,000</td>
<td>$1,000,000</td>
<td>$1,500,000</td>
<td>N/A</td>
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<tr>
<td>Public Service</td>
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<td></td>
<td>Vulnerable Population Unmet Needs</td>
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<tr>
<td></td>
<td>* Rapid Rehousing</td>
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<td></td>
<td>* Case Management Services/Homeless</td>
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<td></td>
<td>* Case Management Services/Housing</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td></td>
<td>$1,075,000</td>
<td>$450,000</td>
<td>$1,525,000</td>
<td>$1,525,000</td>
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<td>Housing</td>
<td>Voluntary Local Buyout and Acquisition Program</td>
<td>$15,000,000</td>
<td>$2,500,000</td>
<td>$17,500,000</td>
<td>$12,250,000</td>
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<tr>
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<td>Program Activities:</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>* Residential Buyout and Demolition</td>
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<tr>
<td></td>
<td>* Relocation Assistance Program</td>
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<tr>
<td></td>
<td>* Tenant Relocation Assistance</td>
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<tr>
<td></td>
<td>Homeownership and Renter Assistance Program</td>
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<td></td>
<td>Program Activities:</td>
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<tr>
<td></td>
<td>* Rehabilitation - Inside 100-year Floodplain</td>
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<td></td>
<td>* Rehabilitation - Outside 100-year Floodplain</td>
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<tr>
<td></td>
<td>* Reconstruction - Outside 100-year Floodplain</td>
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<td></td>
<td>* Down Payment Assistance</td>
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<tr>
<td></td>
<td>* Tenant Relocation Assistance</td>
<td></td>
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<tr>
<td></td>
<td>Affordable Multi-Family Rental Recovery</td>
<td>$13,436,600</td>
<td>$4,821,650</td>
<td>$18,258,250</td>
<td>$16,870,623</td>
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<tr>
<td></td>
<td>Program Activities:</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>* New Multi-Family Housing paired with LIHTC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>New Construction Single Family</td>
<td>$2,000,000</td>
<td>$2,000,000</td>
<td>$4,000,000</td>
<td>$1,400,000</td>
</tr>
<tr>
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<td>Program Activities:</td>
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<td></td>
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<tr>
<td></td>
<td>* Infill Housing for Affordable Homes</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td>Vulnerable Population Unmet Needs</td>
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<td>$600,000</td>
<td>$3,075,000</td>
<td>$2,152,500</td>
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<tr>
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<td>Program Activities:</td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>* Construction / Rehabilitation</td>
<td></td>
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</tr>
</tbody>
</table>

80% Total=$46,828,000  
20% Total=$11,707,000  

| Total Funds Allocated        | 100% Allocation | $58,535,000 | $42,423,123 |
### Program Budget as Compared to Unmet Need

<table>
<thead>
<tr>
<th>Subcategory</th>
<th>Budget Amount</th>
<th>Unmet Need</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Single Family Owner Occupied</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Buyout</td>
<td>$17,500,000</td>
<td></td>
</tr>
<tr>
<td>½ Rehab</td>
<td>$5,875,000</td>
<td></td>
</tr>
<tr>
<td>½ New Construction</td>
<td>$1,000,000</td>
<td></td>
</tr>
<tr>
<td>½ Case Management</td>
<td>$250,000</td>
<td></td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>$24,625,000</strong></td>
<td><strong>$19,744,322</strong></td>
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<tr>
<td><strong>Rental Single/Multifamily</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multifamily</td>
<td>$18,258,250</td>
<td></td>
</tr>
<tr>
<td>½ Rehab</td>
<td>$5,875,000</td>
<td></td>
</tr>
<tr>
<td>½ New Construction</td>
<td>$1,000,000</td>
<td></td>
</tr>
<tr>
<td>½ Case Management</td>
<td>$250,000</td>
<td></td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>$25,383,250</strong></td>
<td><strong>$51,456,431</strong></td>
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<tr>
<td><strong>Vulnerable</strong></td>
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<tr>
<td>Rapid Rehousing</td>
<td>$800,000</td>
<td></td>
</tr>
<tr>
<td>Case Management</td>
<td>$225,000</td>
<td></td>
</tr>
<tr>
<td>Construction/Rehab/PH</td>
<td>$3,075,000</td>
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<tr>
<td><strong>Total:</strong></td>
<td><strong>$4,100,000</strong></td>
<td><strong>$4,179,000</strong></td>
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<td><strong>Other</strong></td>
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<tr>
<td>Admin</td>
<td>$2,926,750</td>
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<td>Planning</td>
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<tr>
<td><strong>Total:</strong></td>
<td><strong>$4,426,750</strong></td>
<td><strong>N/A</strong></td>
</tr>
</tbody>
</table>

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 Disaster 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.

The Method of Distribution for CDBG Disaster funding will place priorities and provide points for amounts of leveraged investment in business development and commercial development projects.

**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.

The Method of Distribution for CDBG Disaster funding will place priorities and provide points for amounts of leveraged investment in business development and commercial development projects.

**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 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.

• Priority will be given to 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.

• 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 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.

• Only owner-occupied rehabilitation 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 tenants, homeless and at-risk of homelessness persons, persons with disabilities, and Public Housing Authorities 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.

The administrating agency for the MO Community Development Block Grant-Disaster Recovery HAP is the Department of Economic Development. 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. Tenant Relocation Assistance
   2.5. Temporary Relocation Assistance
   2.6. Down Payment 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**
   5.1. Rental Housing – Rapid Rehousing
   5.2. Public Facilities – Construction/Rehabilitation
   5.3. Public Housing Unmet Needs

**Applicants and Sub-Applicants**

Only local governments may make application directly to the Housing Assistance Program.
Local governments may make applications “on-behalf of” eligible entities whereby the sub-applicant is provided the CDBG funds for their use to carry out the agreed upon, eligible activities. This is different than a local government receiving a CDBG 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 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. Local governments may choose to adopt housing guidelines stricter than the State Program as long as like persons and like circumstances are treated the same. All local guidelines and optional relocation plans, as applicable must be adopted by resolution. The resolution must include the
structure of their programs and processes and conform to state guidelines. The guidelines must detail how assistance will be prioritized for vulnerable populations. The order of priority of addressing applicants must be established and included in the local guidelines.

Cost Reasonableness and Cost Analysis
Local government grantees receiving CDBG-DR funds are required to establish policies and procedures 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. For example, as the grantee, in designing its program, it might choose as comparison criteria the rehabilitation costs derived from RS Means Residential Cost Data and costs to buyout or acquire the property as a means of determining whether to fund a rehabilitation project. Technical Assistance will be provided by the State. A grantee may also consider offering different housing alternatives, as appropriate, such as manufactured housing options. 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 and must describe the process it will use to make such exceptions in its policies and procedures. Each grantee must adopt policies and procedures that communicate how it will analyze the circumstances under which an exception is needed, how it will demonstrate that the amount of assistance is necessary and reasonable, and how the grantee will make reasonable efforts to provide accessibility features necessary to accommodate an occupant with a disability. 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 of 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 house located inside the floodway, 100-year floodplain, or a designated Disaster Risk Reduction Area.

Projects using CDBG-DR funds must meet one 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.

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 construction activities to follow the guidelines specified in the HUD CPD Green Building Checklist and 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**
Missouri will implement and monitor construction to ensure the safety of residents and the quality of projects developed. All multifamily units developed must comply with the current Minimum Quality Standards (MQS).

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.

**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. All work performed by the contractor will be guaranteed consistent with standards of Missouri, or standards adopted by the State and referenced in contractor agreements to be executed between the homeowner/applicant and contractor. 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 buyout of residential real property, 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 for primary residential properties, but priority will be given to LMI 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
- The program will offer rehabilitation assistance up to 80% of the county assessor’s appraised value of the property, or the actual cost of rehab, whichever is less.
- Program maximum is $40,000 per house (amount includes hard construction costs only).
• 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, where the cost equals or exceeds 50 percent of the county assessor’s appraised value of the structure before the improvement or repair is started, must be elevated with the lowest floor, including the basement, at least 2 feet above the base flood elevation.

Flood Insurance Requirement
  o A HUD-assisted homeowner of a property located inside the 100-year floodplain must obtain and maintain flood insurance.
  o HUD strongly recommends the purchase of flood insurance outside the 100-year floodplain for properties that have been damaged by a flood.
  o Assistance may only be provided for the rehabilitation of a house located in a floodplain if:
    a. The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs; or
    b. 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.

<table>
<thead>
<tr>
<th>Circumstance</th>
<th>Houses and Rentals Inside a Floodway, or Inside 100-year Floodplain</th>
<th>Other Consideration</th>
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<td>Owner Had Flood Insurance at Time of Disaster</td>
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<tr>
<td>Damaged house is in a floodway</td>
<td>Household Meets LMI at Less Than 120% of AMI or National Median Income</td>
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<tr>
<td>Damaged house is inside 100-year floodplain</td>
<td>LMI is defined as less than 120% of Area Median Income or the national median income</td>
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</tr>
<tr>
<td>Damaged house is inside 100-year floodplain, or Disaster Risk Reduction Area</td>
<td>Conduct Buyout using Urgent Need national objective</td>
<td></td>
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<tr>
<td>Damaged house is inside 100-year floodplain</td>
<td>Damaged affordable rents – rental unit(s) inside 100-year floodplain</td>
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</tbody>
</table>

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 owner-occupied houses will be eligible for reconstruction.

- The program will offer rehabilitation assistance up to 80% of the County assessor’s appraised value of the property or the actual cost of rehab, whichever is less.
- Program maximum is $40,000 per house.
- The rehabilitation estimate must include meeting Green Building Standards.
- If the rehab cost estimate exceeds 80% of the County assessor’s appraised value of the property, the property owner will be offered substantial reconstruction.
- A property owner may elect to rehabilitate their property, if the cost estimate exceeds 80% of the assessed value of their home, but the property owner will have to assume the costs above the 80% county assessor’s appraised value and must pay the additional costs with their own financial resources.
• Property owners of rental units must provide fair market rents (affordable rents) for affordability period.
<table>
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<tr>
<th>Circumstance</th>
<th>Owner had flood insurance at time of disaster</th>
<th>Household meets LMI at less than 120% of AMI or national median income</th>
<th>Eligible for rehab or reconstruction</th>
<th>Other Consideration</th>
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<tr>
<td>Affordable Rental Unit is outside 100-year floodplain</td>
<td>N/A</td>
<td>N/A</td>
<td>Rehabilitation Only</td>
<td>Owner or Rental Property must provide fair market rents (affordable rents) for affordability period</td>
</tr>
</tbody>
</table>

**Manufactured Housing Units**

Manufactured Housing Units are homes built entirely in a factory. There are several types of factory-built housing: manufactured homes, modular homes, panelized homes, pre-cut homes, and mobile homes. Water damage to manufactured housing often results in serious structural and environmental health hazards for occupants of manufactured housing units (MHU). The Program has determined it is more cost-effective to achieve long-term recovery through the replacement of the damaged unit with a new unit. The program will not conduct rehabilitation or provide replacement units in the floodplain.

- Health hazards may not be effectively remediated with rehabilitation activities.
- Repairs may not sufficiently address the structural and environmental damages
- Goal of Program is to protect homeowners from potential latent environmental hazards (e.g. mold growth)
- Newer manufactured housing units built to higher construction standards.
  - Offer more storm resiliency
  - Energy-efficient options resulting in better utility efficiency and lower utility charges

Manufactured Housing Units may be assessed as Real Property or Personal Property.

**Real Property**: Manufactured Housing Units may be assessed as real property when the MHU and the property to which the MHU is permanently attached are owned by the same person.

**Personal Property**: Manufactured Housing Units may be assessed as personal property when the MHU owner rents the property to which the MHU is attached.
Owners of Manufactured Housing Units Assessed as Real Property

Buyout and Relocation Assistance for Properties Inside the Floodway, 100-Year Floodplain, or Disaster Risk Reduction Area

- Buyout is available to anyone owning real property in the floodway, floodplain, or disaster risk reduction area. Relocation Assistance is limited to qualified LMI households.
  - When combined with buyout, relocation assistance is available to property owners with income below 120% of the area median income.
    - For benefit to meet the LMHI National Objective, the property owner’s income must qualify below 80 percent of the Area Median Income. Urgent Need National Objective is used for property owners between 80 percent and 120 percent of the Area Median Income.
    - Relocation Assistance is limited to comparable homes within the grantee’s jurisdiction

Homeownership Assistance Outside the Floodway and 100-Year Floodplain:

- Homeownership Assistance is limited to qualified LMI households.
  - For benefit to meet the LMHI National Objective, the property owner’s income must qualify below 80 percent of the Area Median Income. Urgent Need National Objective is used for property owners between 80 and 120 percent of the Area Median Income.
- If damage is less than 50% of the county assessor’s appraised value of the mobile home, mobile home is eligible for rehabilitation.
- For mobile home replacement, a MHU must have sustained damage greater than 50% of the county assessor’s appraised value, as a direct result of the 2017 Severe Storm and Flooding event. FEMA criteria will be used to classify disaster-related levels of damage.
- If damage assessment data provided by FEMA or local officials is not available, a Program Housing Inspector will attempt to confirm whether the structure experienced greater than 50% damage. If this cannot be confirmed by the Inspector, it is the applicant’s responsibility to provide proof of flood damage, including flood height within the structure. Supporting documentation to substantiate Major/Severe damage review may include:
  - Additional interior/and or exterior photos provided by the homeowner that can be compared to Damage Assessment photos taken by either FEMA or the Program Housing Inspector
  - FEMA Individual Assistance Assessment
  - Receipts of repairs completed prior to the Program Damage Assessment
  - Insurance claim documentation

Owners of Mobile Home Parks or Owners of Affordable Mobile Home Rental Units Inside the Floodway, Floodplain or Disaster Risk Reduction Area:

- An owner of a Mobile Home Park located in the floodway, floodplain, or disaster risk reduction area, is eligible to participate in the Voluntary Buyout Program to receive appraised value of the park.
- Owner of Affordable Mobile Home Rental Units, occupied at time of flooding event, is eligible for buyout.
  - Owner eligible for additional assistance for comparable dwelling if providing fair market rents (affordable replacement rental units) outside of floodway, floodplain, or disaster risk reduction area
    - Meets Low/Mod Housing Incentive (LMHI) when CDBG-DR funds are used for a housing incentive award, tied to a the voluntary buyout or other voluntary
acquisition of housing owned by a qualifying LMI household, for which the housing incentive is for the purpose of moving 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.

- Five-year affordability period applies

**Outside the Floodway or 100-year Floodplain:**

- Owner of Affordable Mobile Home Rental Units is eligible for rehabilitation or replacement of the mobile home if unit continues to be rented at HUD fair market rents for five years

**Tenant Relocation Assistance**

Whenever tenants are affected as a result of a buyout of a tenant-occupied single-family home or multifamily housing unit, they will be eligible for a relocation benefit.

- **Eligibility Criteria for relocation expenses and moving costs under the Uniform Relocation Act (URA)**
  - Owner of mobile home (personal property) who is a tenant in mobile home park, involuntarily displaced, or
  - Tenant involuntarily displaced from mobile home park, or
  - Tenant involuntarily displaced of mobile home assessed as real property, or
  - Tenant renting house or apartment
  - Income is under 120 percent of the Area Median Income.

- **Relocation Assistance Benefit**
  - 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.

**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.

All conditions of temporary relocation must be reasonable. At a minimum, the tenant or owner-occupant shall be provided the following:

- Reimbursement for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly rent or utility costs at such housing.
- Appropriate advisory services, including reasonable advance written notice of the following:
  - Date and approximate duration of the temporary relocation;
  - Address of the suitable decent, safe, and sanitary dwelling to be made available for the temporary period;
  - Terms and conditions under which the tenant may lease and occupy a suitable decent, safe and sanitary dwelling in the building/complex upon completion of the project, if applicable; and
Provisions of reimbursement for all reasonable out of pocket expenses incurred in connection with the temporary relocation as noted above.

**Down Payment Assistance**

The following criteria applies to the down payment assistance program:

- Purchase of a lot or using a pre-owned lot located outside the 100-year floodplain or disaster risk reduction area within the grantee’s jurisdiction for construction of a new home (a construction date must be provided), or the applicant is purchasing a newly constructed or existing home located outside the 100-year floodplain or disaster risk reduction area in the grantee’s jurisdiction.
- Existing homes to be purchased must be inspected and considered decent, safe and sanitary.
- The funding must be used within an established timeframe.
- HUD approved a waiver to allow homeownership assistance to be provided to households earning up to 120 percent of the area median income. While homeownership assistance may be provided to households with up to 120 percent of the area median income, only those funds used to serve households with up to 80 percent of the area median income may qualify as meeting the low-and moderate-income person benefit National Objective. For households with income above 80 percent and not exceeding 120 percent of the area median income, the Urgent Need National Objective is used. Assistance is limited to qualified LMI households.
- The amount of assistance is based on the determined need of the applicant; however, the Down payment Assistance may not exceed 25 percent of the total cost of the house, plus closing costs.

A low-to-moderate income person not affected by the disaster but wishing to buy into affordable replacement stock, outside of a floodplain or disaster risk reduction area, within the grantee’s jurisdiction, may be eligible to participate in the Down Payment Assistance program.

**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 construction activities are required to follow the guidelines specified in the HUD CPD Green Building Checklist and meet an industry-recognized standard that has achieved certification under at least one of the following programs:
  o ENERGY STAR (Certified Homes or Multifamily High Rise)
  o Enterprise Green Communities
  o LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development)
  o ICC 700 National Green Building Standard
  o EPA Indoor AirPlus (ENERGY STAR a prerequisite)
  o Any other equivalent comprehensive green building program
• 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 houses on vacant lots within existing neighborhoods. This approach is used to create more affordable housing, while promoting community revitalization. CDBG-DR funds are eligible to assist new construction activities as stated by the waiver providing alternative requirements (cite register). Alternative requirements 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 down payment assistance upon completion of construction. The maximum allowed is 25 percent of the total cost of the house, plus closing costs. 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.

Grantees are required to develop and impose affordability (i.e., resale and recapture) 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 restrictions through recorded deed restrictions, covenants, or other similar mechanisms, for a period not less than five years. Grantees shall establish resale or recapture requirements for housing funded pursuant to this paragraph and shall outline those requirements. The resale and recapture provisions must clearly describe the terms of the resale and 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
1. Public Services
   Case Management
   Provide 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.

   2. Rental Housing
   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.

**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.

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**3. Public Facilities**

**Construction/ Rehabilitation**

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](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 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. 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 Section 414 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.

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.

Meaning of Green Building Standard. For purposes of this notice, the Green Building Standard means the grantees 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.

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).

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.

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.

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.

**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 Home™ Gold level for new construction of single-family, detached homes; and FORTIFIED Home™ Silver level for reconstruction of the roof, windows and doors; or FORTIFIED Home™ 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 Home™ Bronze level standard for roof repair or reconstruction, for all construction covered under subparagraph B.32.c. FORTIFIED Home™ 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 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 disaster 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 saferooms.

The RPCs are listed as an integral partner in the Method of Distribution of CDBG disaster recovery 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 house, 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 house 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.

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 aside 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 Program

**Housing Assistance Expenditures**

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Section Six - Program Administration
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.

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, 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 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. For an explanation of how the data was compiled,

**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. Actual annual allocations from HUD differ more than 10% of projected amount
   c. For the CDBG Program only, a new funding category is created or more than 25% of the allocation is transferred between funding categories

**Performance Reports**

The state provides reasonable notice and an opportunity to comment on performance reports required as part of the funding. Comments received on the performance reports are recorded, and a summary of the comments is attached to the performance report.

**Requirements for Local Governments Receiving CDBG Funds**

Recipients of CDBG 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 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 1) the determination of needs, 2) the review of the proposed activities, and 3) the review of past program performance, in the following manner:

1. At least two public hearings shall be scheduled at times and locations felt to be most likely to make it possible for the majority of interested persons to attend without undue inconvenience, addressing the three items above. At least one hearing must be held to address items (1) and (2) above prior to the submission of the application for housing and/or non-housing needs. Item 3 must be addressed in a public hearing to review performance of the recipient in a previous program and must occur prior to closeout of any loan or grant for which performance evaluation has not occurred in a previous hearing.

2. Notification of all hearings shall be given a minimum of 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. Additional advertisement may be conducted by posting letters, flyers and any other forms which seem practical; however, publication is required. 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 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:

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 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.
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
- 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
List of Abbreviations

CAA – Community Action Agencies
CDBG-DR – Community Development Block Grants – Disaster Recovery
CoC – Continua of Care
COG – Council of Government
FEMA – Federal Emergency Management Agency
HUD – 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
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 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.

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.
Table 1 - Safe Harbor Counties in Missouri

<table>
<thead>
<tr>
<th>Size of Language Group</th>
<th>Recommended Provision of Written Language Assistance</th>
<th>Missouri County</th>
<th>Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,000 or more in the eligible population in the market area or among current beneficiaries</td>
<td>Translated vital documents</td>
<td>Barry, Boone, Buchanan, Cass, Clay, Greene, Jackson, Jasper, McDonald, Pettis, Pulaski, St. Charles, St. Louis City, St. Louis County, Webster</td>
<td>Spanish, Chinese, Spanish, Spanish, Spanish, Spanish, Spanish, Spanish, Vietnamese, African, Spanish, Spanish, Spanish, Spanish, Spanish, Vietnamese, Spanish, Russian, Serbo-Croatian, Chinese, Korean, Vietnamese, Arabic, Other Asian, German</td>
</tr>
<tr>
<td>More than 5% of the eligible population or beneficiaries and more than 50 in number</td>
<td>Translated vital documents</td>
<td>Barry, McDonald, Sullivan</td>
<td>Spanish, Spanish, Spanish</td>
</tr>
<tr>
<td>More than 5% of the eligible population or beneficiaries and 50 or less in number</td>
<td>Translated written notice of right to receive free oral interpretation of documents.</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>5% or less of the eligible population or beneficiaries and less than 1,000 in number</td>
<td>No written translation is required.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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 subgranting 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 most costly 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. NEDED 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. Additionally, in the event that LEP persons come into direct contact with MO CDBG, staff will be instructed to utilize the “I speak cards,” available here, to determine identify the appropriate language necessary to provide assistance to the individual.

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:

• When, 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 CDBG 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.

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 CDBG Communication Specialist:

CDBG Communication Specialist
Missouri Department of Economic Development
Business and Community Services
Harry S. Truman Bldg, Rm 770
Appendix C — Certifications

Certifications Waiver and Alternative Requirement

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:
   (1) 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 2016
pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

(2) 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.

(3) 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.

(4) 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:

(a) 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

(b) 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 (a).

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:

(1) 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

(2) 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 115-56 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
Appendix D — Public Comment

Public Comment and Response

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