

# State of Missouri Action Plan for the 2019 DR-4451 Disaster Recovery



*The revised draft Action Plan will be submitted following the 30-day public comment period, November 20, 2020 to December 22, 2020*

# STATE OF MISSOURI ACTION PLAN FOR THE 2019 DR-4451 DISASTER RECOVERY

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## EXECUTIVE SUMMARY OF MISSOURI'S 2019 CDBG-DR ACTION PLAN

Between April to July of 2019, the State of Missouri was hit with heavy rains, straight-line winds, flooding, and tornadoes that resulted in two federally declared disasters. The disasters had a statewide impact. However, the disasters took their greatest toll on housing, especially that of vulnerable Low- to Moderate income citizens who will have a difficult time recovering.

In the Federal Register Notice (85 FR 4681) released on January 27<sup>th</sup>, 2020, U.S. Department of Housing and Urban Development (HUD) allocated \$30,776,000 to Missouri in the form of a Community Development Block Grant for Disaster Recovery (CDBG-DR) for the 2019 DR-4451 Disaster. HUD designated St. Charles County, zip code 64437 (Holt County), zip code 65101 (Cole County) as Most Impacted and Distressed (MID) and mandated that 80% of the allocation be used to their benefit. HUD further mandated that 70% of the allocation go to the benefit of Low- to Moderate (LMI) citizens.

The State of Missouri concurs with the HUD analysis concerning the MID geographic county and zip codes. It further has determined to expand eligibility to the whole county for Cole and Holt counties as outlined in 85 FR 4683, based on the majority of DR-4451's disaster damage being in the three counties of Cole, Holt and St. Charles. Therefore, Missouri will provide Disaster Recovery funding from the CDBG-DR grant to those counties. While this funding is not equal to the amount of disaster-related housing damage, it will assist many vulnerable citizens. The State conducted an extensive unmet needs assessment of the DR-4551 disaster. From that assessment, Missouri has allocated the limited funding available proportionally between the three MID counties. In this Action Plan, the State of Missouri will implement a disaster recovery strategy that provides the funding and activities to the Units of General Local Government (UGLGs) in the MID counties so they can individually shape the recovery of their citizens. The focus of the recovery is on serving disaster impacted vulnerable populations especially LMI citizens, who are the least likely to recover themselves without assistance.

The State of Missouri's Department of Economic Development (DED) administrates Missouri's CDBG-DR program. DED will conduct a proposal process to award the designated allocations to the MID areas identified in the 2019 CDBG-DR Action Plan. A lead applicant, a Unit of General Local Government (UGLG) from each of the three HUD-identified MID counties, will apply on behalf of the entire MID county. The lead applicant is established by a collaborative effort undertaken by impacted jurisdictions within the county. The lead UGLG will build and submit the proposal for the use of disaster recovery funding allocated to the MID County. The proposal must be within the fiscal boundaries of the budget put forth in this Action Plan. DED will provide the necessary policies for the program and activities. The lead UGLGs will be responsible for delivery of the activities.

Based upon public input and feedback, the State offers multiple program activities which assist disaster survivors. All Missouri program activities focus on actions that maintain, improve, and increase resilience in communities. Missouri will accept proposals incorporating the following program activities: planning, housing counseling, acquisition for demolition only, affordable multifamily rental housing, local voluntary buyout, construction of new affordable housing, homeowner rehabilitation, down payment assistance, and infrastructure to support recovery and restoration.

The HUD CDBG-DR allocation will not be able to meet all the unmet needs caused by the disasters of 2019. The State of Missouri is grateful for the grant and will use it to positively impact the unmet housing needs of some of its most vulnerable citizens.

## 1. Introduction

The winter of 2018-2019 brought substantial severe weather to the State of Missouri. Following the accumulation of a snowpack that was 200-300% above normal in the late winter, an approaching winter storm underwent bombogenesis as it crossed the Rocky Mountains and entered the Great Plains. The storm brought with it hurricane-force winds, several feet of snow, rapidly fluctuating temperatures, and substantial destruction to upland areas of the Missouri River basin. Upstream, in Nebraska, the bomb cyclone caused the overtopping and failure of hundreds of miles of levee systems along the Missouri River and its tributaries, as melting ice was jammed in river channels by floods rapidly flowing downstream toward Missouri, significantly impacting homes and businesses throughout the state.

The severe weather and impacts continued through March, as Missouri experienced numerous tornadoes, high winds, hail, heavy rains, and floods into July of 2019. Tragedy struck on the night of May 22, 2019, coincidentally on the 8-year anniversary of the EF-5 tornado that devastated Joplin, as an EF-3 tornado touched down and stayed on the ground for more than 32 miles, destroying numerous homes, businesses, and infrastructure across the disaster zone and particularly in Cole, Holt, and St. Charles Counties. The high-water conditions in the Missouri River Basin persisted into May as well, leading to substantial sandbagging activities by the National Guard in Chariton County, where a levee was failing near Brunswick. On June 1, the Mississippi River crested at the second highest stage on record (30.15 feet) it reached the third-highest stage (27.11 feet), with several counties topping the historical flood stages observed in 1993, 2011, and 2015. By June 3, at least 28 levees had breached across the state, with flood damages reported widely across disaster impacted counties. More than 380 roads were closed in 56 counties due to significant, damaging floods, and more than 600 homes had been affected by severe storms. As federal disaster response and recovery programs were approved for Missourians, more than 1,400 households requested and received assistance in disaster recovery.<sup>1</sup> Throughout 2019, more than 1.2 million acres of Missouri were inundated by floodwaters and nearly 1.4 million acres of crops could not be planted.<sup>2</sup>

The counties of Cole, Holt and St. Charles saw a majority of the disaster impact in housing and especially on Low- to Moderate Income citizens. The three counties were the top three FEMA Individual Assistance applicant counties. They had 890 of the 2,217 (40%) FEMA Individual Assistance applicants. Cole, Holt and St. Charles counties had over \$7,000,000 of the \$13,500,000 FEMA Homeowner Housing damage. They were the three counties with the highest percentages of Low- to Moderate Income citizens impacted by the disaster, with 1,232 of the 2,271 impacted Low- to Moderate Income citizens. The three counties were the first, second and fourth highest percentage of Low- to Moderate Income Renters impacted counties in the disaster. They were also the top three counties in citizens with Access Functional Needs impacted by the disaster. Of the 304 citizens with Access Functional Needs, 123 were in Cole, Holt and St. Charles counties. The flooding and tornado damage created a greater and more significant unmet need in Cole, Holt and St. Charles counties than any other area in Missouri, especially on vulnerable populations like Low- to Moderate Income citizens and those with Access Function Needs.

Responding to the severity of these events, Missourians demonstrated the grit and resilience of the Heartland. Neighbors helped neighbors, first responders risked life and limb to save lives, and volunteer organizations rapidly mobilized to deliver groceries and other resources to survivors of the catastrophic events.<sup>3</sup> Though many tears were shed for community and individual losses, organizations such as the

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<sup>1</sup> [https://sema.dps.mo.gov/maps\\_and\\_disasters/disasters/4451.php](https://sema.dps.mo.gov/maps_and_disasters/disasters/4451.php)

<sup>2</sup> <https://dnr.mo.gov/floodrecovery/docs/2019-08-27-frawg-minutes.pdf>

<sup>3</sup> <https://www.samaritanspurse.org/article/neighbors-helping-neighbors-after-missouri-floods/>

University of Missouri quickly stepped in to provide financial support and structure in damaged areas.<sup>4</sup> Missouri helped neighboring states also impacted severely by the severe weather of 2019, and those neighboring states helped Missouri as residents of all ages responded to floods with community sandbagging efforts, “where sore backs and good consciences were the only reward.”<sup>5</sup>

The State continues recovery efforts, the community spirit of neighbors helping neighbors was met with support from federal, state, local, university, and volunteer organizations, all working tirelessly to support individuals and families in need of basic services, shelter, and housing. Missouri’s Convoy of Hope stepped in to deliver groceries, totes, and boxes to residents packing up their belongings following the EF-3 tornado’s impacts in Jefferson City, altogether serving tens of thousands of Missourians through networks of hundreds of volunteers. Repairing damages to residences, businesses, and infrastructure will be key to rebuilding the affected parts of Missouri, with fiscal, social, and environmental challenges expected for years to come as state and local governments, civic organizations, and community leaders rise to the occasion.



St. Charles Co, SCCMO.org

## 2. Background

Since 2001, Congress has appropriated Community Development Block Grant Disaster Recovery (CDBG-DR) to certain, severely impacted communities that have received Presidential Disaster Declarations (PDD). Through subsequent legislation, the Supplemental Appropriations for Disaster Relief Act of 2017 allocated \$7.4 billion in CDBG-DR funds for qualifying disasters through 2017. The Supplemental Appropriations for Disaster Relief Act (2018) allocated \$28 billion in CDBG-DR funds and the Additional Supplemental Appropriations for Disaster Relief Act (2019) allocated \$3.8 billion in CDBG-DR funds to

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<sup>4</sup> <https://news.missouri.edu/2019/neighbors-helping-neighbors/>

<sup>5</sup> <https://news.mobar.org/executive-summary-a-legacy-of-service-helping-our-neighbors-navigate-disaster-recovery/>



assist in long-term recoveries from major disasters that occurred in 2017, 2018, and 2019. Of these funds, HUD assigned \$10.03 billion to satisfy a portion of long-term recovery and unmet needs that remain after other federal assistance has been allocated, such as from the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), or private insurance.

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, through the Federal Register notice (85 FR 4681)<sup>6</sup>, that it will receive an allocation of \$30,776,000 in disaster recovery funds to assist in recovery from disasters in 2019, with no less than \$24,621,000 to St. Charles County, zip code 64437 in Holt County, and zip code 65101 in Cole County.

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, 80 percent of the combined total awarded to Missouri will go to the most impacted and distressed counties. HUD also states that, in the case of funds designated to a zip, the grantee may expand program operations to the whole county as a most impacted and distressed area. All the allocated funds must be used for eligible disaster-related activities. To ensure that fraud, waste, and misuse of funds does not occur, effective controls must be in place and monitored for compliance.

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

As required by HUD, Missouri submits this Unmet Needs Assessment as part of its Action Plan to outline its unmet needs to develop the most impactful recovery program for the state. 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 Action Plan. This Unmet Needs Assessment was developed with the help of many state and local stakeholders, as well as the public, in order to identify and prioritize the greatest unmet needs that can be addressed by these limited federal funds.

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<sup>6</sup> <https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf>

### 3. MISSOURI DISASTER RECOVERY PROGRAM

#### 3.1. Missouri's Disaster History

Since 1957, Missouri has had 61 Major Disaster Declarations, including twenty (51) disasters involving flooding - a rate of nearly one major disaster every .8 years.<sup>7</sup> Concurrently, severe storm disaster events are nearly as frequent as flooding events across the state and although tornado disasters continue to be less frequent than flooding events (25 Disaster events include tornadoes since 1957), they are among the top three events included in Presidential Disaster Declarations (Table 1). In short, Missouri is not a stranger to extreme events or Major Disasters.

Table 1: State of Missouri hazards included in historical disaster declarations

Hazard	Times included in a Disaster Declaration
Flooding	48
Severe Storms	44
Tornadoes	25
Straight-line Winds	7
Severe Winter Storm	6
Floods	3
Hail	2
Tornado	2
Flash Flooding	1
Heavy Rains	1
High Wind	1
Ice Storm	1
Severe Thunderstorms	1
Snowstorm	1
Torrential Rain	1
Grand Total	144

#### Summary of Impacted and Presidentially Declared Counties

Severe weather during the spring of 2019 caused substantial impacts to Missouri. In early March 2019, a “bomb cyclone” delivered extreme precipitation, wind, and infrastructure damage to parts of the Great Plains. The combination of more than 3 feet of snow followed by a rapid rise in temperatures, several inches of rain, and melting ice led to severe flooding along the Missouri River and a failure of the 92-year-old Spencer Dam upstream in Nebraska, which caused an 11-foot wall of water to inundate the Town of Niobrara.<sup>8</sup> The ice and floods caused substantial ice jams, and more than 163 levees in 45 levee

<sup>7</sup>

[https://www.fema.gov/disasters?field\\_dv2\\_state\\_territory\\_tribal\\_value\\_selective=MO&field\\_dv2\\_incident\\_type\\_tid=49112&field\\_dv2\\_declaration\\_type\\_value=DR&field\\_dv2\\_incident\\_begin\\_value%5Bvalue%5D%5Bmonth%5D=&field\\_dv2\\_incident\\_begin\\_value%5Bvalue%5D%5Byear%5D=&field\\_dv2\\_incident\\_end\\_value%5Bvalue%5D%5Bmonth%5D=&field\\_dv2\\_incident\\_end\\_value%5Bvalue%5D%5Byear%5D=](https://www.fema.gov/disasters?field_dv2_state_territory_tribal_value_selective=MO&field_dv2_incident_type_tid=49112&field_dv2_declaration_type_value=DR&field_dv2_incident_begin_value%5Bvalue%5D%5Bmonth%5D=&field_dv2_incident_begin_value%5Bvalue%5D%5Byear%5D=&field_dv2_incident_end_value%5Bvalue%5D%5Bmonth%5D=&field_dv2_incident_end_value%5Bvalue%5D%5Byear%5D=)

<sup>8</sup> <https://www.kcur.org/post/saturated-and-still-dealing-floods-northwest-missouri-fears-more-spring>

systems were breached; the U.S. Army Corps of Engineers estimated that more than 1,000 miles of levees breached along the Missouri River and its tributaries, causing at least \$1 billion in infrastructure damages.<sup>9</sup>

From March 2019 through July 2019, Missouri also experienced tornadoes, high winds, hail, and heavy rains that further set the stage for major flooding along the Missouri and Mississippi rivers. The prolonged inundation and ground failure across the state also caused flash flooding in many areas. As a result of snowpack that was two to five times above normal during this same timeframe, there was also significant river flooding in the northern plains. Additionally, the state endured rainfall that was 200% to 300% of normal, resulting in long-term, major flooding throughout the state from May to early June. Some areas in the state experienced river flooding exceeding historic levels received in 1993, 2011, and 2015. From late April through May 2019, numerous tornadoes impacted the state, including an EF-3 tornado with 160 mph winds that was on the ground for more than 32 miles, devastating parts of Jefferson City (Callaway and Cole Counties) and causing several fatalities.<sup>10,11,12,13,14</sup> Of at least 908 reports of severe weather affecting Missouri in 2019, there were 98 reported tornadoes.<sup>15</sup>



Communities across the state suffered significant damage to hundreds of homes resulting from these various weather events and their sustained impacts. Businesses and multiple water and wastewater treatment facilities were also impacted. In Holt County, floodwaters inundated about 20 percent of croplands, preventing the planting of more than 95 percent of croplands and causing substantial impacts to local sales tax revenue.<sup>16</sup> The Missouri Department of Transportation reported over 200 road closures, including major state highways and Interstate 29, the primary north-south thoroughfare serving the Upper Midwest and Great Plains region between Kansas City, Missouri and Winnipeg, Manitoba, Canada.<sup>17</sup>

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<sup>9</sup> <https://www.kmbc.com/article/farmland-remains-underwater-after-historic-flooding-along-missouri-river/29778821#>

<sup>10</sup> <https://www.arcgis.com/apps/MapSeries/index.html?appid=78f64ed973c1459f9abf41c8e3e6317e>

<sup>11</sup> <https://www.weather.gov/lx/May2122SevereStorms>

<sup>12</sup> [https://www.weather.gov/sgf/2019\\_April\\_30\\_TornadoOutbreak](https://www.weather.gov/sgf/2019_April_30_TornadoOutbreak)

<sup>13</sup> [https://www.weather.gov/eax/28May2019\\_Tornadoes](https://www.weather.gov/eax/28May2019_Tornadoes)

<sup>14</sup> <https://twitter.com/MoPublicSafety/status/1131416290470629376>

<sup>15</sup> <https://www.spc.noaa.gov/climo/online/monthly/states.php?month=00&year=2019&state=MO>

<sup>16</sup> <https://www.kcur.org/post/saturated-and-still-dealing-floods-northwest-missouri-fears-more-spring>

<sup>17</sup> <https://apnews.com/76f253a8294a411d8bf077daf258f4ec>

#### 4. INDIVIDUAL IMPACTS<sup>18</sup>

- Total Number of Residences Impacted:<sup>19</sup> 1,650
  - Destroyed: 209
  - Major Damage: 744
  - Minor Damage: 433
  - Affected: 264
- Percentage of Insured Residences:<sup>20</sup> 49.7%
- Percentage of Poverty Households:<sup>21</sup> 12.3%
- Percentage of Ownership Households: 82.0%
- Population Receiving Other Government Assistance such as SSI and SNAP: 13.2%
- Pre-Disaster Unemployment: 3.3%
- Age 65 and Older: 15.6%
- Age 18 and Under: 22.5%
- Disability: 8.7%
- IHP Cost to Capacity (ICC) Ratio: 45
- Total Individual Assistance Cost Estimate: \$13,613,517

#### 5. PUBLIC INFRASTRUCTURE IMPACTS

- Statewide Per Capita Impact Indicator:<sup>22</sup> \$1.50
- Countywide Per Capita Impact Indicator:<sup>23</sup> \$3.78

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<sup>18</sup> <https://www.fema.gov/media-library-data/1572488906765-15d185931ba36ff51e94b7b9661b9db6/FEMA4451DRMO.pdf>

<sup>19</sup> Degree of damage to impacted residences:

- Destroyed – total loss of structure, structure is not economically feasible to repair, or complete failure to major structural components (e.g., collapse of basement walls/foundation, walls or roof);
- Major Damage – substantial failure to structural elements of residence (e.g., walls, floors, foundation), or damage that will take more than 30 days to repair;
- Minor Damage – home is damaged and uninhabitable, but may be made habitable in short period of time with repairs; and
- Affected – some damage to the structure and contents, but still habitable.

<sup>20</sup> By law, Federal disaster assistance cannot duplicate insurance coverage. 42 U.S.C. § 5155 and 44 C.F.R. § 206.48(b)(5).

<sup>21</sup> Special populations, such as low-income, the elderly, or the unemployed may indicate a greater need for assistance. 44 C.F.R. § 206.48(b)(3).

<sup>22</sup> Statewide Per Capita Impact Indicator for FY19, Federal Register, October 1, 2018.

<sup>23</sup> Countywide Per Capita Impact Indicator for FY19, Federal Register, October 1, 2018.

## 6. DECLARATION

The second of two<sup>24</sup> Presidential Disaster Declarations were issued in response to state-wide disaster. On July 9, 2019, DR-4451-MO was approved in response to damages caused by the severe storms, tornadoes, and flooding for the period of April 29th to July 5, 2019 (Figure 1). A total of 87 of the 114 counties in the state were approved for FEMA program assistance. Of these, 61 received Public Assistance (PA) only (Table 2); four received Individual Assistance (IA) only; and 22 received both PA and IA. The Hazard Mitigation Grant Program (HMGP) was also approved statewide. While DR-4435-MO and DR-4451-MO had similar effects and impacted many of the same areas, this assessment will focus on the 26 counties approved for IA (Table 1). There were 16 counties approved for PA in DR-4435-MO that were also included in DR-4451-MO. Of those 16 overlapping counties, eight (8) were approved for IA, causing confusion among survivors regarding their eligibility for IA based on their FEMA registration date.<sup>25</sup> This was especially prominent in Northwest Missouri where five of the eight overlapping IA approved counties are located.

## 7. COVID-19 OPERATING ENVIRONMENT

On Wednesday, March 11, 2020, the World Health Organization (WHO) declared the worldwide outbreak of COVID-19 (a/k/a “novel coronavirus,” specifically named “severe acute respiratory syndrome coronavirus 2” or SARS-CoV-2) an official pandemic as the disease rapidly spread to more than 114 counties, sickening more than 100,000 people and causing more than 4,000 deaths.<sup>26</sup> The WHO issued medical mitigation guidance, including calling for widespread social isolation and deployment of response resources to squelch community transmission of COVID-19, the first coronavirus that has ever caused a pandemic.

On Thursday, March 26, 2020, a Presidential Disaster Declaration designated for Public Assistance Category B (emergency protective measures, including direct federal assistance) all counties in the State of Missouri in response to the COVID-19 pandemic. Accordingly, HUD issued a “CDBG-DR COVID-19 Fact Sheet” on Tuesday, March 31, 2020 to provide guidance to the recipients of federal funding under CDBG programs.<sup>27</sup> The guidance addresses several key concerns for the use of CDBG-DR and MIT funds:

1. A CDBG-DR grantee **may not** use CDBG-DR funds to address the COVID-19 pandemic.
2. A CDBG-DR grantee **may generally** use program income generated by its CDBG-DR activities to support the COVID-19 pandemic, advising grantees to consult the *Federal Register* for any variances in the use of program income.
3. HUD began authorizing 90-day extensions of the established deadline for all CDBG-MIT action plans and financial management and grant compliance certification submissions due to the

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<sup>24</sup> On May 20, 2019, DR-4435-MO was approved in response to damages caused by the severe storms, straight-line winds, and flooding during the period of March 11th to April 16th. Under this declaration a total of 16 counties in the state were approved to receive support from FEMA’s Public Assistance (PA) program and the Hazard Mitigation Grant Program (HMGP). However, DR-4435-MO did not include support from FEMA’s Individual Assistance (IA) program.

<sup>25</sup> <https://www.kansascity.com/news/politics-government/article237837154.html>

<sup>26</sup> <https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020>

<sup>27</sup> <https://files.hudexchange.info/resources/documents/CDBG-DR-COVID-19-FAQs.pdf>

COVID-19 pandemic, advising grantees to consult the *Federal Register* for specific action plan submission dates or to determine if HUD approval letters for extensions were granted. Further, HUD is granting additional flexibility to grantees who received allocations for 2018 or 2019 disasters, including for 2017 unmet infrastructure needs.

4. HUD is authorizing a 90-day extension for all CDBG-DR quarterly performance reports under the National Disaster Resilience program.
5. Grantees may continue to submit requests for release of funds and receive authorization to use grant funds from HUD.
6. HUD is allowing CDBG-MIT grantees *only* the option to hold virtual public hearings for public participation/hearing requirements when there is concern for significant public health risks from COVID-19 pandemic.

The spread and impact of COVID-19 remains a very dynamic situation for the U.S. and State of Missouri. As of Wednesday, July 15, 2020 Missouri had 29,714 confirmed cases of COVID-19 with 1,103 related deaths. The State of Missouri’s Show Me Strong Recovery Plan recommended 6-foot social distancing space, staying at home if a citizen feels sick, practicing good hygiene, and avoiding socializing in groups that do not readily allow for appropriate physical distancing.

The State of Missouri’s CDBG-DR Program will conduct all aspects of its program in accordance with the Center for Disease Control and Prevention (CDC), Missouri’s Show Me Strong Recovery Plan and Missouri Department of Health and Senior Services guidance.

Table 2: Individual Assistance Declared County List for DR-4451

<b>COUNTY</b>	<b>INDIVIDUAL ASSISTANCE</b>	<b>PUBLIC ASSISTANCE</b>
<b>Andrew</b>	√	√
<b>Atchison</b>	√	√
<b>Boone</b>	√	√
<b>Buchanan</b>	√	√
<b>Callaway</b>	√	√
<b>Carroll</b>	√	√
<b>Chariton</b>	√	√
<b>Cole</b>	√	√
<b>Greene</b>	√	IA Only
<b>Holt</b>	√	√
<b>Jackson</b>	√	√
<b>Jasper</b>	√	√
<b>Jefferson</b>	√	IA Only
<b>Lafayette</b>	√	√
<b>Lewis</b>	√	√
<b>Lincoln</b>	√	√
<b>Livingston</b>	√	√
<b>McDonald</b>	√	√
<b>Miller</b>	√	√

<b>Newton</b>	√	√
<b>Osage</b>	√	IA Only
<b>Pike</b>	√	√
<b>Platte</b>	√	IA Only
<b>Pulaski</b>	√	√
<b>Saline</b>	√	√
<b>St. Charles</b>	√	√
<b>Grand Total</b>	<b>26</b>	<b>22</b>

Table 3. Public Assistance Only County List for DR-4451

Adair	Harrison	Putnam
Barry	Henry	Ralls
Barton	Hickory	Randolph
Bates	Howard	Ray
Benton	Howell	Schuyler
Bollinger	Knox	Scotland
Caldwell	Laclede	Scott
Camden	Linn	Shannon
Cape Girardeau	Macon	Shelby
Cedar	Maries	St. Clair
Clark	Marion	St. Louis
Clay	Mercer	Ste. Genevieve
Cooper	Mississippi	Stoddard
Dade	Monroe	Sullivan
Dallas	Montgomery	Taney
Daviess	New Madrid	Texas
Douglas	Nodaway	Vernon
Dunklin	Ozark	Wayne
Gasconade	Pemiscot	Webster
Gentry	Perry	Wright
Grundy		







Demographic and impact data for this report was largely generated using 2017 American Community Survey 5-Year Survey data, FEMA Individual Assistance (March 11, 2020), and Small Business Administration Home Loan Program data (April 6, 2020). A variety of data sources was used to determine Missouri’s impacts and unmet needs, including information from several state and federal government data sources (Table 4).

Table 4. Data sources utilized in this assessment

Theme	Data	Source (and URL where available)
Impact Guidance	83 FR 40314	Housing and Urban Development - <a href="https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf">https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf</a>
	85 FR 4681	<a href="https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf">https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf</a>
	83 FR 5833	<a href="https://www.gpo.gov/fdsys/pkg/FR-2018-02-09/pdf/2018-02693.pdf">https://www.gpo.gov/fdsys/pkg/FR-2018-02-09/pdf/2018-02693.pdf</a>
	83 FR 40314	<a href="https://www.gpo.gov/fdsys/pkg/FR-2018-08-14/pdf/2018-17365.pdf">https://www.gpo.gov/fdsys/pkg/FR-2018-08-14/pdf/2018-17365.pdf</a>
Demographics	United States Census Data	<a href="https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t">https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t</a>
	HUD Income Limit Data	<a href="https://www.huduser.gov/portal/datasets/il.html#2018">https://www.huduser.gov/portal/datasets/il.html#2018</a>
	United States Census Households over 65 Living Alone	<a href="https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1101&amp;prodType=table">https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1101&amp;prodType=table</a>
	United States Census Median Family Income	<a href="https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1903&amp;prodType=table">https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1903&amp;prodType=table</a>
	United States Census Race	<a href="https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B02001&amp;prodType=table">https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B02001&amp;prodType=table</a>
	United States Census County Quick Facts	<a href="https://www.census.gov/quickfacts/fact/table/fl/HSG010217">https://www.census.gov/quickfacts/fact/table/fl/HSG010217</a>
	Homelessness	<a href="http://www.mhdc.com/ci/Missouri%20Homelessness%20Study_Final_11.18.19.pdf">http://www.mhdc.com/ci/Missouri%20Homelessness%20Study_Final_11.18.19.pdf</a>
Economic Impacts	Small Business Administration Home Loan Report	Small Business Administration
	Small Business Administration Business Loan Report	Small Business Administration
Event Impacts	Preliminary Damage Assessment	Federal Emergency Management Agency - <a href="https://www.fema.gov/media-library-data/1572488906765-15d185931ba36ff51e94b7b9661b9db6/FEMA4451DRMO.pdf">https://www.fema.gov/media-library-data/1572488906765-15d185931ba36ff51e94b7b9661b9db6/FEMA4451DRMO.pdf</a>
	Presidential Disaster Declaration Areas	<a href="https://www.fema.gov/disaster/4451/designated-areas">https://www.fema.gov/disaster/4451/designated-areas</a>
	Low - Mod Income data	<a href="https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/">https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/</a>

Housing Impacts	FEMA Applicant Data - Homeowners	<a href="https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1">https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1</a>
	FEMA Applicant Data - Renters	<a href="https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1">https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1</a>
	FEMA Disaster Declaration Summaries	<a href="https://www.fema.gov/openfema-dataset-disaster-declarations-summaries-v1">https://www.fema.gov/openfema-dataset-disaster-declarations-summaries-v1</a>
	FEMA FIDA 4451	Federal Emergency Management Agency
	Open FEMA Dataset: Public Assistance Funded Project Details	<a href="https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1">https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1</a>
Infrastructure Impacts	Missouri Flood Recovery Advisory Working Group	<a href="https://dnr.mo.gov/floodrecovery/">https://dnr.mo.gov/floodrecovery/</a>

## 8. UNMET NEEDS ASSESSMENT

### 8.1 Targeting Priority Needs

This assessment will focus heavily on three counties outlined in Federal Register notice (85 FR 4681)<sup>28</sup>. In 85 FR 4681 HUD notified the State of Missouri that no less than \$24,621,000 of the \$30,776,000 should be spent in St. Charles County, zip code 64437 in Holt County, and zip code 65101 in Cole County. Drawing from this pre-determined set of Most Impacted and Distressed (MID) counties, this unmet need assessment will highlight Cole, Holt, and St. Charles Counties but will also provide impact and unmet need information for all DR-4451 Individual Assistance counties. The pages that follow will highlight not only the current impacts in the MID counties but will also provide justification for other impacted and distressed counties that would likely require additional resources in the form of potential future DR allocations, non-profit, philanthropic, or private funding to speed recovery.

#### 8.1.1 A Focus on Low-Moderate Income, Lack of Insurance, and Impacts

FEMA released (in early 2020) redacted<sup>29</sup> applicant level Individuals and Household Program (IHP) dataset for every Presidentially Declared disaster in which the Individual and Households Program was activated. A cursory analysis of the DR-4451 records within this dataset revealed that HUD’s determination of most impacted and distressed counties aligns with FEMA’s general accounting for impacts, vulnerabilities, and potential obstacles to a full recovery. Using FEMA’s Open IHP data<sup>30</sup> to understand general impacts and recovery support provides a generally complete understanding of the types of households requesting assistance, income, household composition, housing type and tenure, amount of damage to structures, funding made available, and indication of access and functional needs, and ages of persons living in impacted housing. As such, the IHP data enables one to categorize and compare across designated counties. Several indicator variables (Table 4) were created from FEMA’s IHP data based on guidance from HUD. Including all Presidentially Declared counties in this assessment enables clear identification of those most impacted and distressed areas while also allowing the state to

<sup>28</sup> <https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf>

<sup>29</sup> No personally identifiable information is present in this FEMA dataset. All PII had been removed prior to posting on OPEN FEMA at <https://www.fema.gov/openfema-dataset-individuals-and-households-program-ihp-valid-registrations>. Data downloaded on 3/11/2020.

understand where all the declared counties fall on the impact/unmet needs continuum. Included in these variables were indicators of Low-Moderate Income populations, applicants without homeowners or flood insurance, those with flood specific damage, and an accounting of personal property losses. While Cole, Holt, and St. Charles appear at the top of this table, thus aligning with HUD’s assessment, counties further down the list also have unmet needs and would benefit from additional federal resources should they become available.

Table 5. Most Impacted and Distressed Indicator Sets

<b>Indicator Variable</b>	<b>Variable Type</b>	<b>Variable Description</b>	<b>Variable Weighing for Impact Scoring Equation</b>
<i>LMI Score</i>	Count	Score of county owners below 80% LMI as a ratio of all IA county owners below 80% LMI (0-1)	3 X Importance
<i>IA Ineligible, No HOI, but with damage score</i>	Count	Score of county HA ineligible owner applicants with real property loss but with no homeowner’s insurance as ratio of all IA county ineligible owners with real property losses but no homeowner’s insurance (0-1)	2 X Importance
<i>No FI Damage Score</i>	Damage Sum	Score of total county flood damage for owners without flood insurance as ratio of all flood damage for owners without flood insurance	1 X Importance
<i>Flood Damage Count Score</i>	Count	Score of number of owner units in county with flood damage as a ratio of all IA owner units with flood damage	1 X Importance
<i>Count of Real Property Score</i>	Count	Score of total number of owner units with real property loss in county as a ratio of all IA owner units with real property losses	1 X Importance
<i>Count of Personal Property Score</i>	Count	Score of total number of owner units with personal property loss in county as a ratio of all IA owner units with personal property losses	1 X Importance
<i>Average Personal Property Score</i>	Average Damage Sum	Score of average personal property loss for owner units in county in relation to average personal property losses for all IA owner units with personal property losses	1 X Importance

Ratios of each indicator to the total state value for that indicator created a value enabling comparison across counties – irrespective of county size. For instance, the LMI ratio value was calculated as the total number of LMI applicants in each county divided by the total number of LMI applicants across all IA declared counties (Table 6).

Table 6. Most Impacted and Distressed Indicator Ratios

<b>County</b>	<b>LMI Ratio</b>	<b>IA Ineligible, No HOI, with RPFVL Ratio</b>	<b>No FI with Flood Damage Ratio</b>	<b>Count of Flood Damaged Homes Ratio</b>	<b>Count of Real Property Ratio</b>	<b>Count of Personal Property Ratio</b>	<b>Average PPFVL Ratio</b>
<i>Cole</i>	11.28%	11.86%	0.64%	5.05%	11.30%	5.61%	\$3,034
<i>Holt</i>	7.95%	1.69%	11.99%	7.45%	14.63%	9.13%	\$2,751
<i>St. Charles</i>	25.81%	15.25%	22.06%	32.31%	46.28%	31.73%	\$2,257
<i>Andrew</i>	5.11%	6.78%	4.35%	5.59%	10.64%	3.37%	\$1,668
<i>Atchison</i>	1.95%	0.85%	2.44%	2.13%	3.59%	2.56%	\$1,600
<i>Boone</i>	0.73%	0.85%	1.44%	0.93%	0.93%	0.80%	\$4,105
<i>Buchanan</i>	3.33%	4.24%	5.25%	4.12%	9.71%	3.69%	\$2,033
<i>Callaway</i>	0.89%	0.00%	0.87%	0.80%	2.13%	0.64%	\$1,833
<i>Carroll</i>	2.27%	1.69%	1.13%	2.13%	4.52%	1.12%	\$1,933
<i>Chariton</i>	4.14%	5.08%	5.23%	3.46%	5.72%	2.24%	\$3,190
<i>Greene</i>	1.79%	0.00%	0.67%	1.06%	4.92%	1.76%	\$656
<i>Jackson</i>	4.14%	2.54%	8.05%	4.39%	11.17%	5.29%	\$3,280
<i>Jasper</i>	3.33%	5.08%	2.07%	2.26%	9.04%	3.04%	\$1,078
<i>Jefferson</i>	1.06%	3.39%	0.44%	1.06%	1.60%	0.96%	\$1,081
<i>Lafayette</i>	0.81%	0.85%	0.75%	0.93%	1.33%	0.80%	\$1,401
<i>Lewis</i>	0.73%	0.00%	0.97%	0.93%	1.60%	0.96%	\$2,422
<i>Lincoln</i>	7.87%	0.85%	12.51%	10.37%	12.23%	8.97%	\$2,450
<i>Livingston</i>	1.38%	2.54%	3.92%	1.33%	2.39%	1.76%	\$3,242
<i>McDonald</i>	3.49%	2.54%	7.00%	3.72%	7.58%	5.45%	\$2,480
<i>Miller</i>	3.57%	8.47%	0.07%	0.53%	4.12%	0.96%	\$4,011
<i>Newton</i>	2.52%	4.24%	2.25%	3.86%	6.91%	3.21%	\$1,383
<i>Osage</i>	0.81%	0.00%	0.44%	0.93%	1.60%	0.48%	\$633
<i>Pike</i>	3.00%	4.24%	4.85%	3.19%	6.78%	3.85%	\$2,485
<i>Platte</i>	0.81%	1.69%	0.31%	0.80%	1.33%	0.96%	\$1,183
<i>Pulaski</i>	1.14%	0.00%	0.00%	0.53%	1.73%	0.48%	\$2,141
<i>Saline</i>	0.08%	15.25%	0.29%	0.13%	0.53%	0.16%	\$920

These values were then converted into scores ranging from zero to one (0-1) using a min/max scaling technique so that each value could be compared directly to the next. Finally, weighting applied more importance to LMI populations and those places with higher numbers of FEMA IHP ineligible applicants, without insurance, who were found to have damage – real or personal. A focus of LMI populations and those without insurance aligns this assessment with federal guidance and provides a view of those counties across Missouri with both higher impacts and more disaster victims in distress (Table 7).

Table 7. Most Impacted and Distressed Indicator Scores

<i>County</i>	<b>LMI Score</b>	<b>IA Ineligible, No HOI, with RPFVL Score</b>	<b>No FI with Flood Damage Score</b>	<b>Count of Flood Damaged Homes Score</b>	<b>Count of Real Property Score</b>	<b>Count of Personal Property Score</b>	<b>Average PPFVL Score</b>
<i>Cole</i>	0.44	0.78	0.03	0.15	0.24	0.17	0.69
<i>Holt</i>	0.31	0.11	0.54	0.23	0.31	0.28	0.61
<i>St. Charles</i>	1.00	1.00	1.00	1.00	1.00	1.00	0.47
<i>Andrew</i>	0.20	0.44	0.20	0.17	0.22	0.10	0.30
<i>Atchison</i>	0.07	0.06	0.11	0.06	0.07	0.08	0.28
<i>Boone</i>	0.03	0.06	0.07	0.02	0.01	0.02	1.00
<i>Buchanan</i>	0.13	0.28	0.24	0.12	0.20	0.11	0.40
<i>Callaway</i>	0.03	0.00	0.04	0.02	0.03	0.02	0.35
<i>Carroll</i>	0.09	0.11	0.05	0.06	0.09	0.03	0.37
<i>Chariton</i>	0.16	0.33	0.24	0.10	0.11	0.07	0.74
<i>Greene</i>	0.07	0.00	0.03	0.03	0.10	0.05	0.01
<i>Jackson</i>	0.16	0.17	0.36	0.13	0.23	0.16	0.76
<i>Jasper</i>	0.13	0.33	0.09	0.07	0.19	0.09	0.13
<i>Jefferson</i>	0.04	0.22	0.02	0.03	0.02	0.03	0.13
<i>Lafayette</i>	0.03	0.06	0.03	0.02	0.02	0.02	0.22
<i>Lewis</i>	0.03	0.00	0.04	0.02	0.02	0.03	0.52
<i>Lincoln</i>	0.30	0.06	0.57	0.32	0.26	0.28	0.52
<i>Livingston</i>	0.05	0.17	0.18	0.04	0.04	0.05	0.75
<i>McDonald</i>	0.13	0.17	0.32	0.11	0.15	0.17	0.53
<i>Miller</i>	0.14	0.56	0.00	0.01	0.08	0.03	0.97
<i>Newton</i>	0.09	0.28	0.10	0.12	0.14	0.10	0.22
<i>Osage</i>	0.03	0.00	0.02	0.02	0.02	0.01	0.00
<i>Pike</i>	0.11	0.28	0.22	0.10	0.14	0.12	0.53
<i>Platte</i>	0.03	0.11	0.01	0.02	0.02	0.03	0.16
<i>Pulaski</i>	0.04	0.00	0.00	0.01	0.03	0.01	0.43
<i>Saline</i>	0.00	1.00	0.01	0.00	0.00	0.00	0.08

Finally, these values were summed using the weighting described in Table 4 generating a total score for each IA declared county. These scores were ranked from 1-26 resulting in St. Charles, Cole, and Holt as the most impacted and distressed (Table 8). Interestingly, several counties ranked just below these MID counties were close in total score to those identified in 85 FR 4681<sup>30</sup> as the most impacted and distressed. Lincoln, Miller, Andrew, and Jackson each exhibited higher scores in some indicators. As their scores and ranks indicate, survivors in these counties would benefit from any future disaster recovery funds made available in the future.

<sup>30</sup> <https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf>

Table 8. Most Impacted and Distressed Indicator Final Scores and Ranks

<b>County</b>	<b>Total Impact Score</b>	<b>Rank of Impact Score</b>
<i>St. Charles</i>	9.47	1
<i>Cole</i>	4.14	2
<i>Holt</i>	3.11	3
<i>Lincoln</i>	2.96	4
<i>Miller</i>	2.61	5
<i>Andrew</i>	2.46	6
<i>Jackson</i>	2.46	7
<i>Chariton</i>	2.40	8
<i>Saline</i>	2.10	9
<i>McDonald</i>	2.01	10
<i>Buchanan</i>	2.01	11
<i>Pike</i>	2.00	12
<i>Jasper</i>	1.61	13
<i>Livingston</i>	1.54	14
<i>Newton</i>	1.51	15
<i>Boone</i>	1.31	16
<i>Carroll</i>	1.08	17
<i>Atchison</i>	0.92	18
<i>Jefferson</i>	0.78	19
<i>Lewis</i>	0.71	20
<i>Pulaski</i>	0.61	21
<i>Callaway</i>	0.55	22
<i>Platte</i>	0.54	23
<i>Lafayette</i>	0.51	24
<i>Greene</i>	0.41	25
<i>Osage</i>	0.16	26

## 8.2 Focus on Social Vulnerability

Missouri utilized the Social Vulnerability Index<sup>31</sup> to inform the recovery action plan development process by empirically delineating the most socially vulnerable census tracts within each IA designated county.

**Residents in these high vulnerability areas generally have a lower ability to adequately prepare for, respond to, and rebound from environmental impacts (such as floods), shocks, and stresses.**

Vulnerable populations will often require additional resources and support to bounce back. Failure to support vulnerable populations during disaster recovery may ultimately lead to additional impacts and resource needs weeks, months, and years down the line.

Utilizing social vulnerability information in concert with FEMA damage data provides a standardized, replicable, and pragmatic process for understanding where scarce resources would be most helpful in driving successful disaster recovery. FEMA’s lists of Individual Assistance (IA) applicants and identifies

<sup>31</sup> [www.vulnerabilitymap.org](http://www.vulnerabilitymap.org)

those applicants with a FEMA verified loss. This list does not contain any personally identifiable information (PII). Combining FEMA damage data at the zip code level – the most granular level available from this set of FEMA data<sup>32</sup>, provided a more nuanced view of damages across the state. FEMA verified losses were overlaid with social vulnerability information to identify areas that were both heavily impacted and had a lower capacity to absorb such losses (Figure 2). Here, one can see the intersection of higher losses (zip code level) and places with lower vulnerability in the eastern and central IA counties. These places are characterized by a general attenuation of impacts due to lower levels of social vulnerability. Conversely, populations residing in northwestern and north central IA counties, although much less heavily populated, are characterized by generally higher levels of social vulnerability. In Cole County, a north-south swath of high impact and medium to high social vulnerability is clear (Figure 3) while in Holt County social vulnerability is high across many census tracts and losses are medium to low (Figure 4). Finally, St. Charles County has pockets of high vulnerability and high losses, but in general the populations across the county have lower vulnerability although they experienced higher losses (Figure 5). Bivariate maps of losses and social vulnerability for the remainder of IA counties can be found in Appendix A. Targeting resources to these most heavily impacted and vulnerable areas will yield the highest benefit because these areas will be much less able to bounce back without outside assistance.



St Louis, Post Dispatch David Carson

This geographic overlay, combining areas of highest vulnerability with the areas containing significant numbers of damaged homes, shown in the map below, clearly indicates that some counties and sub-county areas **not only contain the highest rate of damaged homes but often also have the highest social vulnerability** (Figure 2). Each of the three MID counties (Cole, Holt, and St. Charles) have areas with both high FEMA Real Property Losses and high social vulnerability – depicted in dark burgundy in figures 3-5. Populations in these areas along with those in darker red areas have a diminished capacity to prepare for, respond to, cope with, and rebound from disaster events.<sup>33</sup> **Targeting support to these areas in the immediate and long-term recovery phases of the flood disaster will yield the best outcomes for those with the highest need.** This view provides an additional perspective in support of implementation, outreach, and program design. However, a comprehensive analysis of Unmet Needs is discussed in greater detail in Section 3, Unmet Needs Assessment.

<sup>32</sup> No personally identifiable information is present in this FEMA dataset. All PII had been removed prior to posting on OPEN FEMA at <https://www.fema.gov/openfema-dataset-individuals-and-households-program-ihp-valid-registrations>. Data downloaded on 3/11/2020.

<sup>33</sup> <https://doi.org/10.1175/2011WCAS1092.1>



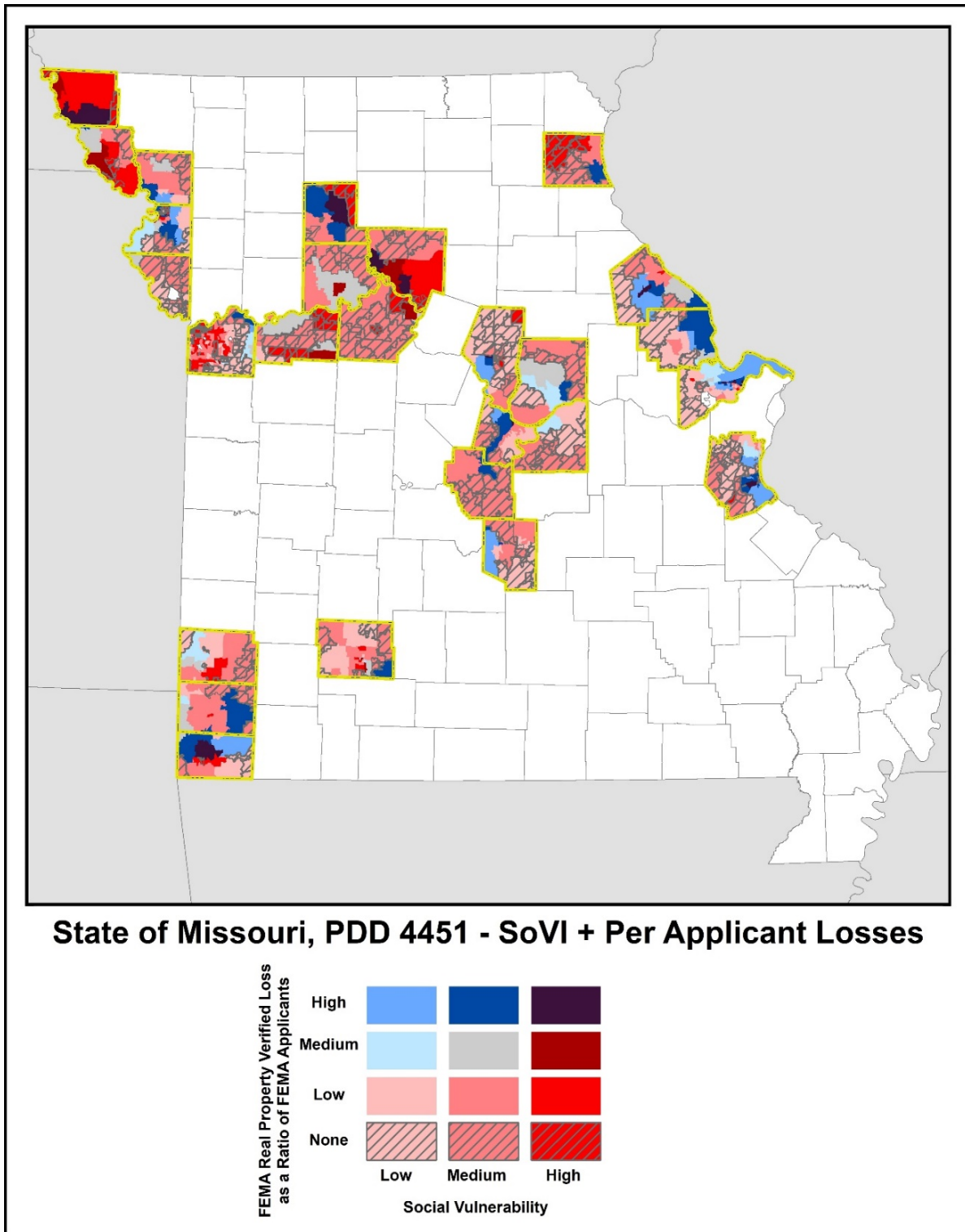


Figure 2. Bivariate Overlay of Damaged Housing Units & Social Vulnerability – DR-4451 IA Counties.



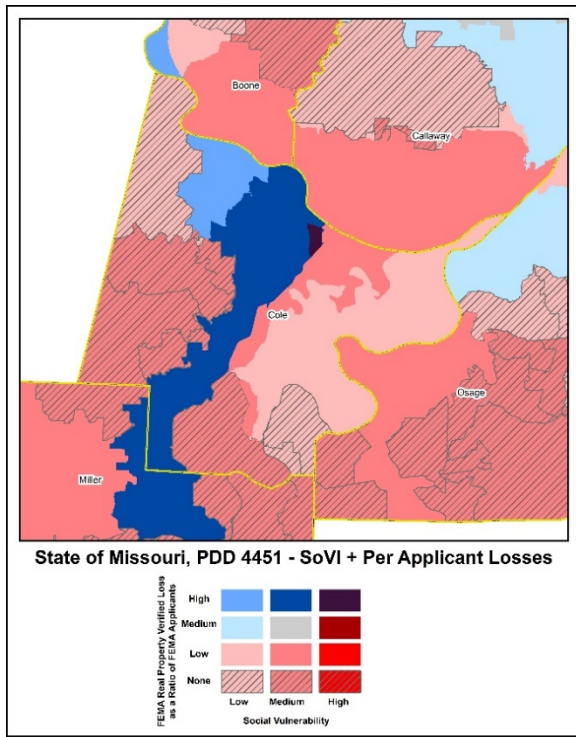


Figure 3. Bivariate overlay of damaged housing units & social vulnerability – Cole County

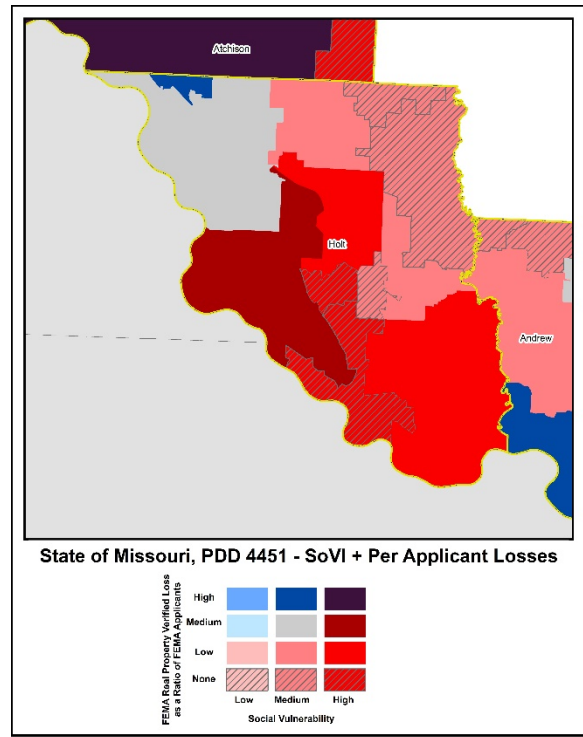


Figure 4. Bivariate overlay of damaged housing units & social vulnerability – Holt County

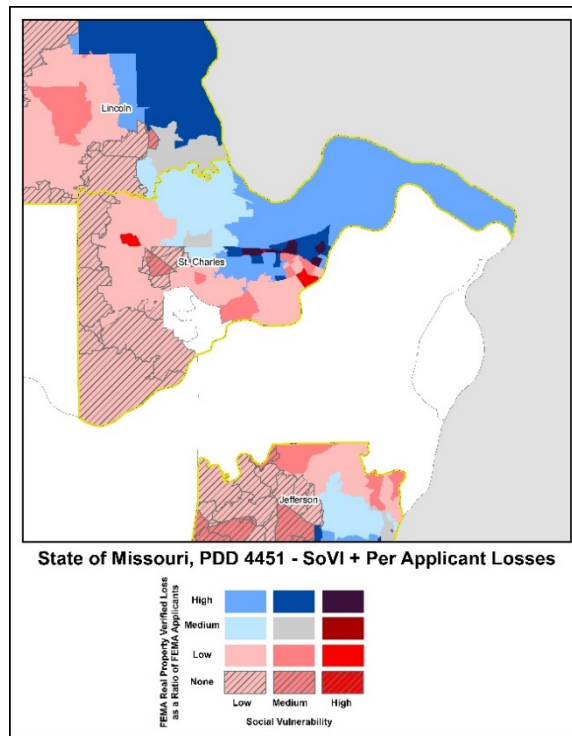


Figure 5. Bivariate overlay of damaged housing units & social vulnerability – St. Charles County

### 8.3 Demographic Profile of the Impacted Area

Table 8, below, shows a breakdown of socioeconomics and demographics for Cole, Holt, and St. Charles Counties. Appendix B: DR-4451, County Demographic Profiles provides demographic profiles for all declared counties in Missouri. While many community characteristics across the impact area are similar to state trends and percentages, there are a few specific socio-demographic differences that should be addressed as a fuller discussion of unmet needs is created. Less than 7.9 percent of Missouri's population resides in the impacted areas of Cole, Holt, and St. Charles counties covered in this assessment. The population in the impacted area differs from the statewide population in several key areas.

First, the impacted areas of Cole and St. Charles counties have a much lower percentage of people living in poverty (8.9% and 5.7%, respectively) than the state (13.2%), and Holt County is slightly above the state average (13.3%). This poverty is a primary indicator of places that might see greater impacts from disasters because of a general lack of ability to prepare for shocks and stresses and may provide an indicator of resiliency where poverty is lower. While Cole and St. Charles counties have populations of residents over the age of 65 that is near the state average of 16.9%, Holt County has a significantly higher population of older residents (25.1%). Notably, Holt County's median home value is significantly less than the state average, and there are fewer residents holding a bachelor's degree in the county compared to the state average. Both Cole and St. Charles counties have more residents with bachelor's degrees than the state average, and the median home value is also higher than the state average in both counties. Similarly, Cole and St. Charles counties have fewer residents with disabilities than the state average, but Holt County is higher than the statewide average at 12.1%. Holt County also has a lower-than-state-average number of residents in the civilian labor force. These data indicate that many impacted counties, and especially Cole, Holt, and St. Charles, have a higher relative concentration of individuals with vulnerabilities that influence how they respond to disaster events and will decrease their speed of recovery.

Table 9. Demographic Profile Information for MID Counties - American Community Survey Data, 2019 Release

People	United States	Missouri	Cole County	Holt County	St. Charles County
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	76,745	4,403	402,022
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	6.00%	5.20%	5.90%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	16.60%	25.10%	15.20%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	83.70%	96.80%	89.90%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	12.40%	0.40%	5.10%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	0.40%	1.20%	0.20%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	1.40%	0.40%	2.70%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	2.00%	1.20%	2.00%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	2.90%	1.30%	3.40%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	3.00%	0.90%	4.00%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	33,508	2,795	156,324
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	67.50%	72.00%	80.40%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$160,300	\$96,100	\$208,900
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$635	\$457	\$1,024
<b>Building permits, 2018</b>	1,328,827	16,875	171	Suppressed	2,326
<b>Households, 2014-2018</b>	119,730,128	2,396,271	29,749	2,056	144,643
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.42	2.11	2.64
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	4.30%	1.20%	5.90%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	91.90%	90.90%	94.70%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	32.90%	19.80%	37.80%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	8.20%	12.10%	6.70%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	10.10%	13.20%	6.20%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	9,273	Suppressed	3,689
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	63.80%	59.00%	70.10%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$57,587	\$45,610	\$81,411
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$29,433	\$25,517	\$37,229
<b>Persons in poverty, percent</b>	11.80%	13.20%	8.90%	13.30%	5.70%

## 8.4 Impact on Low-and Moderate Income Populations

All programs supported by HUD Community Development Block Grant for Disaster Recovery (CDBG-DR) assistance must demonstrate benefit to individuals and communities by meeting one of the program’s three National Objectives for all money spent on projects. These are: (1) benefiting low and moderate income (LMI) persons, (2) aiding in the prevention or elimination of slums or blight, or (3) meeting a need having particular urgency (urgent need)<sup>34</sup> - Table 10.

**Low to moderate income households are defined as households that do not exceed 80% of the median income for their area**, as determined by HUD. These income categories are grouped into the following classifications:<sup>35</sup>

- **Very low income** – has an annual income at 30% or below the area median income
- **Low income** – has an annual income at 31% to 50% of the area median income; and
- **Moderate income** – has an annual income at 51% to 80% of the area median income.

For the purpose of CDBG-Disaster Recovery programs, Grantees apply the below terminology consistent with the original language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system.<sup>36</sup>

Table 10. HUD LMI Classifications

Household Area Median Income	Classification/ Terminology	Reporting Designation in DRGR
0%-30%	Very Low Income	Low Income
31%-50%	Low Income	Low Income
51%-80%	Moderate Income	Moderate Income
81% or Higher	Above LMI	Urgent Need

Please refer to Appendix C: DR-4451 County Low-Moderate Income Limits for 2016 Area Median Income Limits by Family Size and County, and Appendix D for Detailed County LMI Maps.

Many of the counties in the impacted area have relatively high rates of low-and-moderate income (LMI) populations (Figure 6). Overall, the average LMI rate for counties across the state-impacted area was

<sup>34</sup> These National Objective definitions and corresponding language are set by HUD regulation.

<sup>35</sup> The term “Low-and-Moderate Income” is defined in the Housing and Community Development Act of 1974 as: The terms "persons of low and moderate income" and "low and moderate income persons" mean families and individuals whose incomes do not exceed 80 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of low income" means families and individuals whose incomes do not exceed 50 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of moderate income" means families and individuals whose incomes exceed 50 percent, but do not exceed 80 percent, of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families.

<sup>36</sup> HUD Program Income Limits are published annually for use across all HUD funded program and contain incongruous terminology to the Housing Act. Terminology published in the annual income limits is applied to other HUD funded formula allocation programs to support individual income group targets within the LMI category: <https://www.huduser.gov/portal/datasets/il.html>

approximately 69.05%. Every presidentially declared IA county is above the state average (46.04%) for LMI populations. Table 10 illustrates the average LMI percentage across all block groups in any county and the maximum LMI of any single block group within that county. What becomes clear when looking at the maximum LMI values is that every county has at least one area characterized by very low-income levels. When block group populations are examined, additional LMI concentrations within each county become apparent, as illustrated in the map above. Detailed LMI maps of each presidentially declared Individual Assistance county with heavy impacts are show in (Figures 7 - 9) below. Parts of Cole County, specifically the Jefferson City area, and parts of St. Charles County have particular high LMI groups.

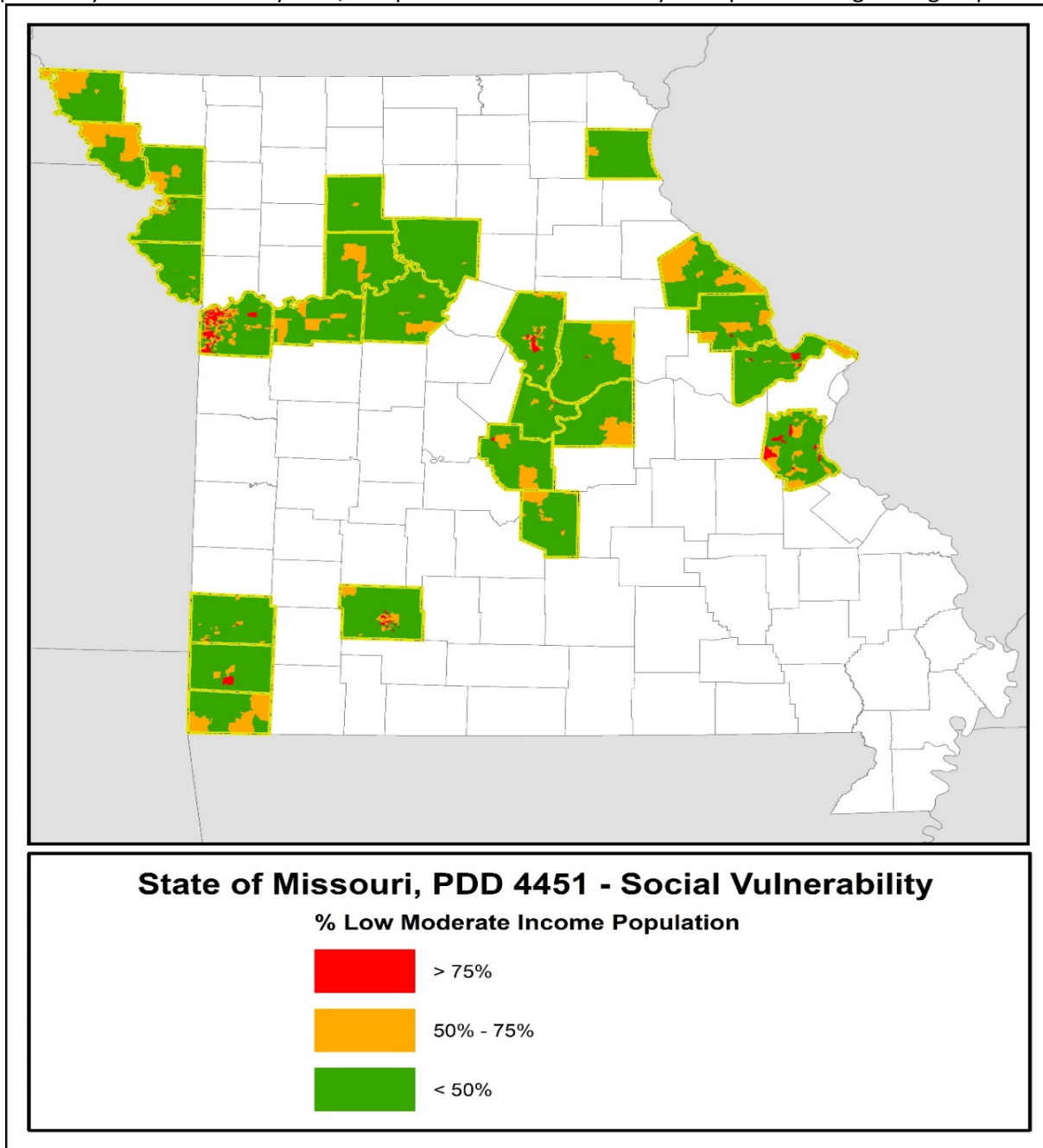


Figure 6. Low- to Moderate Income by Block Group for IA Declared Counties

Table 11. DR-4451 - Low- to Moderate Income Summary for Impacted Counties

<b>County</b>	<b>Total Block Groups</b>	<b>Count of &gt; 50% LMI Block Groups</b>	<b>Minimum LMI % in Block Group</b>	<b>Maximum LMI % in Block Group</b>	<b>Average LMI % in Block Group</b>
<i>Cole</i>	54	13	53.73%	96.88%	73.86%
<i>Holt</i>	6	2	51.16%	54.13%	52.65%
<i>St. Charles</i>	169	27	50.32%	97.77%	62.92%
<i>Andrew</i>	14	3	50.49%	53.39%	52.13%
<i>Atchison</i>	7	2	52.89%	54.12%	53.51%
<i>Boone</i>	87	44	50.20%	100.00%	73.22%
<i>Buchanan</i>	72	28	50.26%	85.95%	63.87%
<i>Callaway</i>	34	6	51.44%	79.82%	59.46%
<i>Carroll</i>	11	3	51.48%	60.29%	56.37%
<i>Chariton</i>	9	1	61.69%	61.69%	61.69%
<i>Greene</i>	167	75	50.27%	96.97%	70.34%
<i>Jackson</i>	548	333	50.26%	100.00%	72.92%
<i>Jasper</i>	94	31	50.32%	97.30%	63.41%
<i>Jefferson</i>	129	41	50.24%	94.19%	63.63%
<i>Lafayette</i>	30	12	52.59%	73.02%	62.62%
<i>Lewis</i>	11	2	53.62%	54.81%	54.22%
<i>Lincoln</i>	26	7	50.34%	75.27%	60.28%
<i>Livingston</i>	11	2	54.46%	64.01%	59.24%
<i>McDonald</i>	17	4	50.15%	62.86%	57.02%
<i>Miller</i>	21	6	50.32%	81.92%	66.60%
<i>Newton</i>	45	10	50.48%	81.65%	59.64%
<i>Osage</i>	11	2	57.36%	57.69%	57.53%
<i>Pike</i>	17	7	50.36%	68.79%	55.61%
<i>Platte</i>	63	13	52.36%	82.54%	61.39%
<i>Pulaski</i>	29	8	51.64%	77.11%	60.66%
<i>Saline</i>	24	6	51.56%	62.61%	56.79%
<b>Grand Total</b>	<b>1,706</b>	<b>688</b>	<b>50.15%</b>	<b>100.00%</b>	<b>69.05%</b>

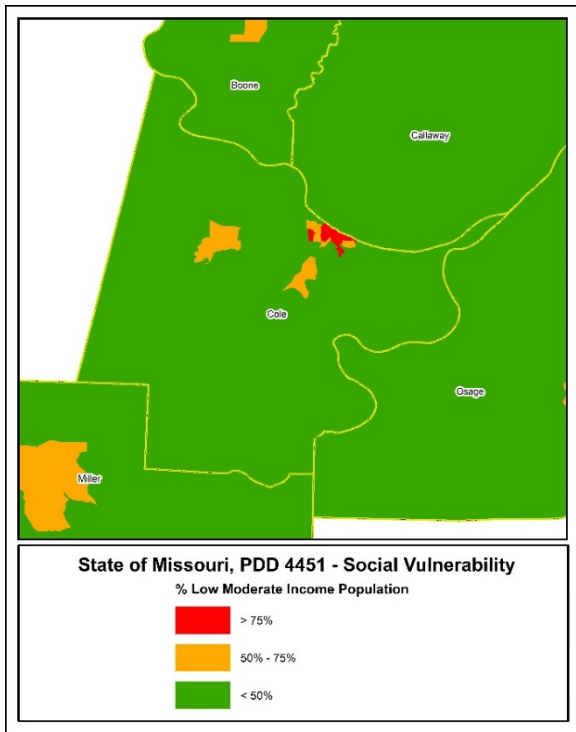


Figure 7. Low to Moderate income by block group – Cole County

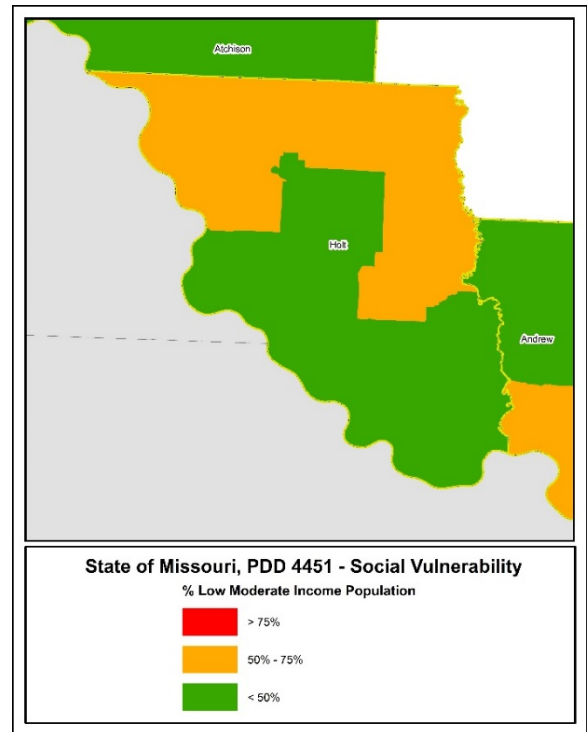


Figure 8. Low to moderate income by block group – Holt County

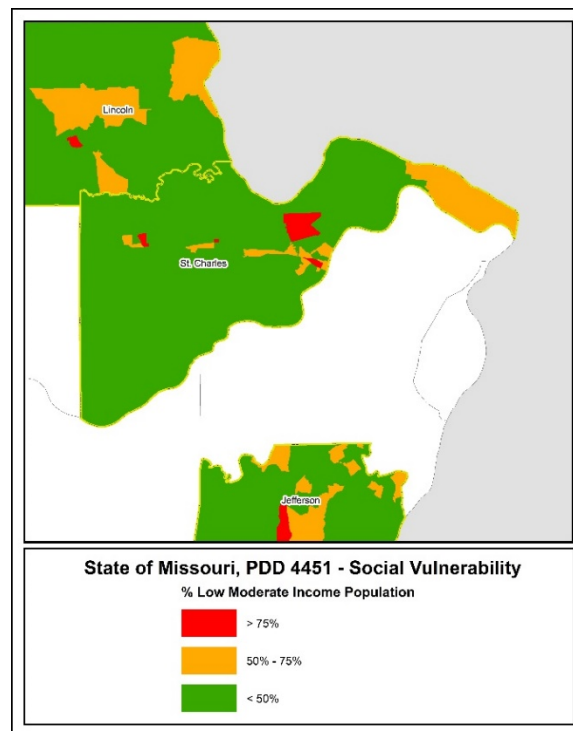


Figure 9. Low to Moderate income by block group – St. Charles County



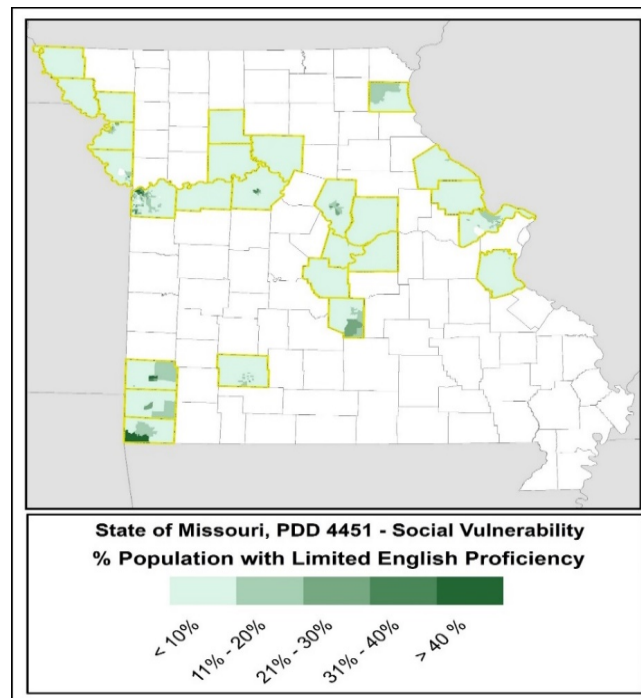
## 8.5 Impact on Special Needs Populations

Individuals with access and functional needs will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, transportation disadvantaged, homeless, have chronic medical disorders, and/or a pharmacological dependency. They could have disabilities, live in institutions, have limited English proficiency.<sup>37</sup>

Specialized resources may include, but are not limited to social services, accommodations, information, transportation, or medications to maintain health. Regardless of the nature of the need, care must be taken to ensure that all individuals are able to access disaster recovery resources.

According to U.S. Census data, approximately 4.44% and 6.41% of the population in Cole and St. Charles counties, respectively, speaks a language other than English at home and does not understand English well, with McDonald (15.44%), Pulaski (11.42%), Saline (10.99%), and Jackson (10.32%) counties having the highest relative percent of the population speaking different languages and not understanding English well.<sup>38</sup> Outreach and Marketing for the Action Plan will take careful consideration of the language needs of these populations (see the sections on Outreach and Citizen Participation for more information).

The map below shows concentrations of limited English by census tract (Figure 10) followed by a (Table 11) that shows the number of residents who speak only English or who speak Spanish or other languages, by county. Notably, of the three most impacted counties, St. Charles has several pockets of higher concentrations of residents who limited English proficiency (Figures 11 - 13). Appendix E: DR-4451 County English Proficiency contains detailed maps of English proficiency for the declared counties.



<sup>37</sup> US Dept. of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response, “Public Health Emergency” – <http://www.phe.gov/Preparedness/planning/abc/Pages/atrisk.aspx>

<sup>38</sup> Source: ACS (2013-2017): [https://data.census.gov/cedsci/table?g=0400000US29.050000&y=2017&d=ACS%205-Year%20Estimates%20Detailed%20Tables&t=Language%20Spoken%20at%20Home&tid=ACSDT5Y2017.C16001&hidePreview=false&cid=B06007\\_001E&vintage=2017](https://data.census.gov/cedsci/table?g=0400000US29.050000&y=2017&d=ACS%205-Year%20Estimates%20Detailed%20Tables&t=Language%20Spoken%20at%20Home&tid=ACSDT5Y2017.C16001&hidePreview=false&cid=B06007_001E&vintage=2017)



Figure 10: Percent population speaking English "not well" or not at all by census tract

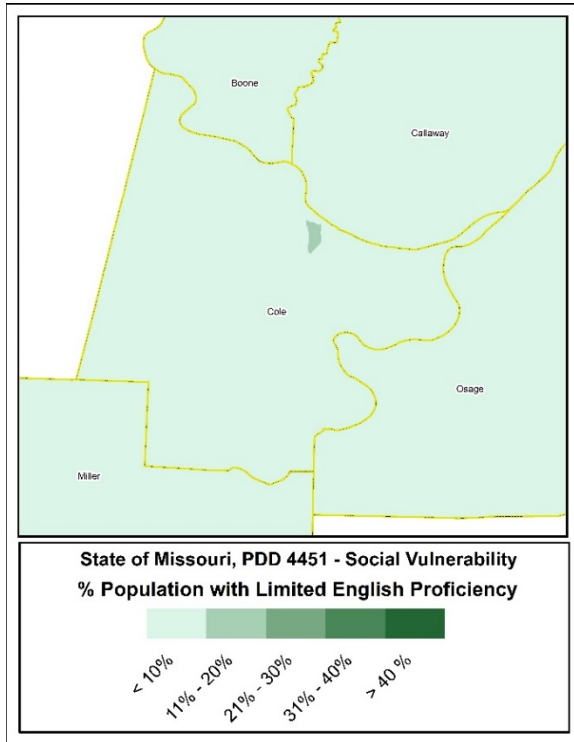


Figure 11. Percent population speaking English "not well" or not at all by census tract – Cole County

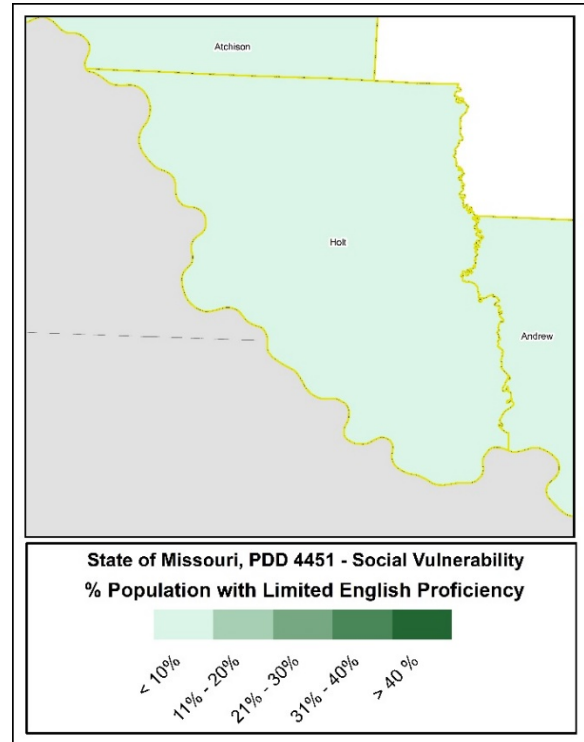


Figure 12. Percent population speaking English "not well" or not at all by census tract – Holt County

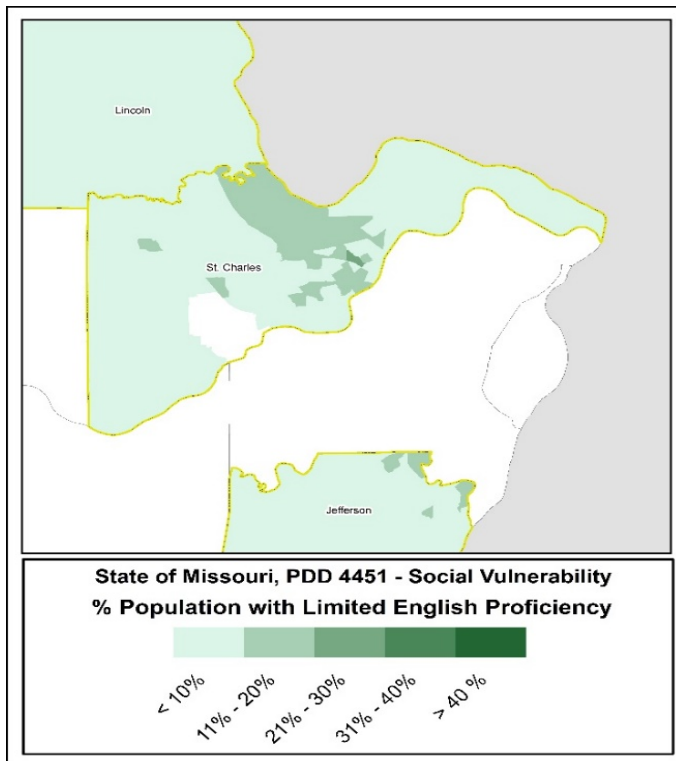


Figure 12. Percent population speaking English "not well" or not at all by census tract – St. Charles County

Table 12. DR-4451, Language Spoken at Home and Ability to Speak English for Persons 5 Years and Older<sup>39</sup>

County	Total Population	Total Speaking English Only at home	% Speaking English Only at home	Speaking language other than English at home		% Speaking a Different Language at home and English "Less than Very Well"	
				Total	% Speaking a Different Language at home	Spanish	Another Language
Cole	72,103	69,041	95.75%	3,062	4.44%	0.45%	0.60%
Holt	4,255	4,221	99.20%	34	0.81%	0.00%	0.33%
St. Charles	361,383	339,623	93.98%	21,760	6.41%	0.70%	0.76%
Adair	24,242	22,794	94.03%	1,448	5.97%	0.13%	1.89%
Andrew	16,417	16,079	97.94%	338	2.10%	0.05%	0.07%
Atchison	5,055	5,001	98.93%	54	1.08%	0.00%	0.85%
Boone	164,186	151,816	92.47%	12,370	8.15%	0.41%	2.06%
Buchanan	83,661	78,779	94.16%	4,882	6.20%	1.58%	1.33%
Callaway	42,339	41,367	97.70%	972	2.35%	0.46%	0.42%
Carroll	8,368	8,178	97.73%	190	2.32%	0.27%	0.61%
Chariton	7,107	7,044	99.11%	63	0.89%	0.11%	0.42%
Greene	269,246	255,784	95.00%	13,462	5.26%	0.63%	1.01%
Jackson	641,819	581,661	90.63%	60,158	10.34%	2.50%	1.14%
Jasper	110,176	102,253	92.81%	7,923	7.75%	2.24%	0.61%
Jefferson	209,036	203,461	97.33%	5,575	2.74%	0.25%	0.41%
Lafayette	30,836	29,998	97.28%	838	2.79%	0.81%	0.33%
Lewis	9,515	9,123	95.88%	392	4.30%	0.19%	0.91%
Lincoln	51,168	50,227	98.16%	941	1.87%	0.68%	0.08%
Livingston	14,140	13,868	98.08%	272	1.96%	0.00%	0.64%
McDonald	21,224	18,379	86.60%	2,845	15.48%	4.85%	2.43%
Miller	23,354	22,988	98.43%	366	1.59%	0.34%	0.27%
Newton	54,607	51,245	93.84%	3,362	6.56%	1.40%	1.14%
Osage	12,850	12,592	97.99%	258	2.05%	0.14%	0.68%
Pike	17,403	16,681	95.85%	722	4.33%	0.58%	0.61%
Platte	90,850	84,092	92.56%	6,758	8.04%	0.58%	1.96%
Pulaski	49,434	44,366	89.75%	5,068	11.42%	1.83%	1.23%
Saline	21,560	19,425	90.10%	2,135	10.99%	3.16%	1.34%
Grand Total	2,416,334	2,260,086	93.53%	156,248	6.41%	1.98%	0.99%

Being over the age of 65 or having children under the age of 5 contributes to the potential vulnerability of a household. The map below (Figures 14 - 17) shows concentrations of households with age dependent populations, by census tract. Concentrations of age dependent populations are noticeable in

<sup>39</sup> [https://data.census.gov/cedsci/table?g=0400000US29.050000&y=2017&d=ACS%205-Year%20Estimates%20Detailed%20Tables&t=Language%20Spoken%20at%20Home&tid=ACSDT5Y2017.C16001&hidePreview=false&cid=B06007\\_001E&vintage=2017](https://data.census.gov/cedsci/table?g=0400000US29.050000&y=2017&d=ACS%205-Year%20Estimates%20Detailed%20Tables&t=Language%20Spoken%20at%20Home&tid=ACSDT5Y2017.C16001&hidePreview=false&cid=B06007_001E&vintage=2017)

parts of Cole County, particularly Jefferson City, as well as in parts of St. Charles County. APPENDIX F provides maps for all IA declared counties.

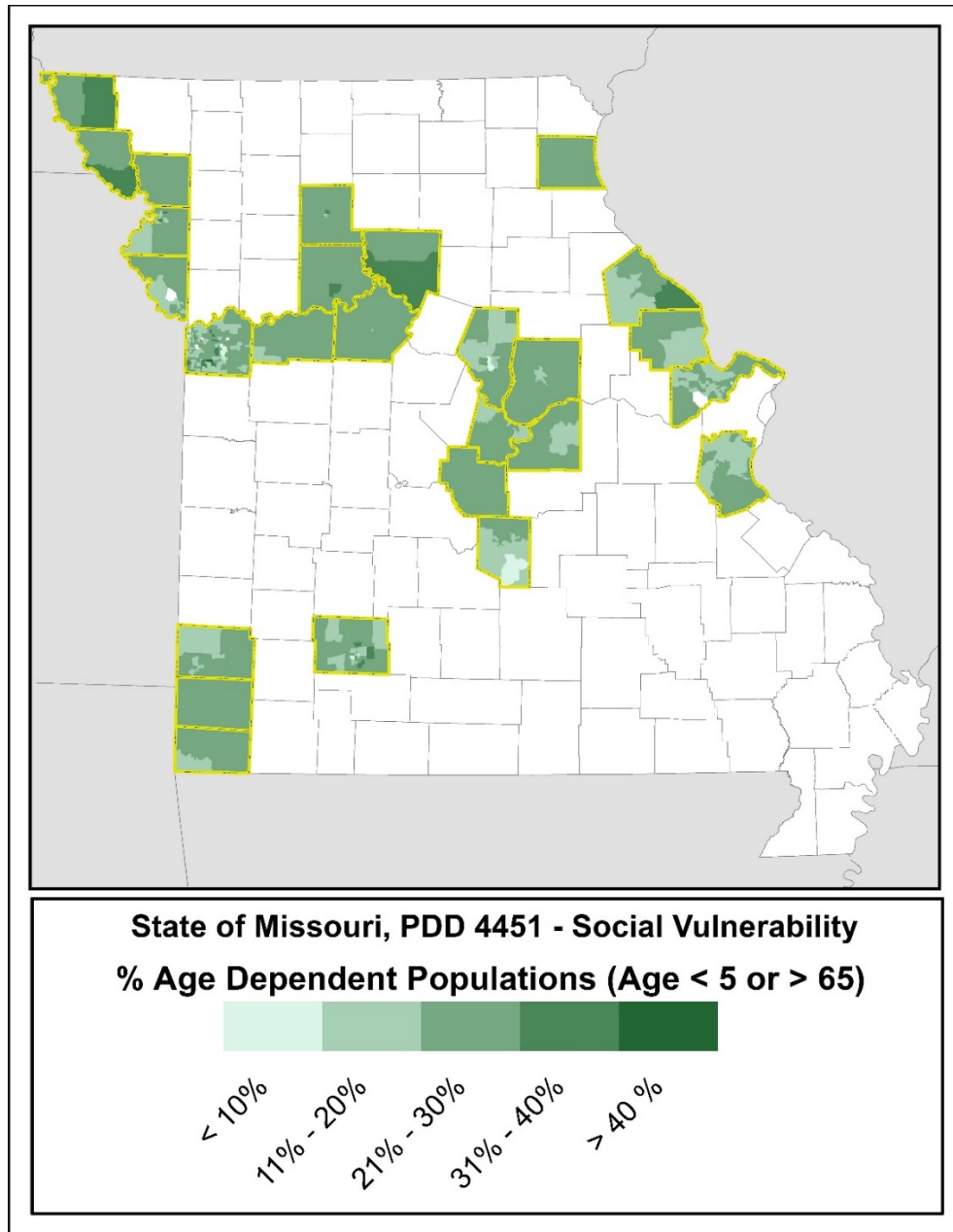


Figure 14. Percent population characterized as “age dependent” (Age < 5 or > 65) by census tract

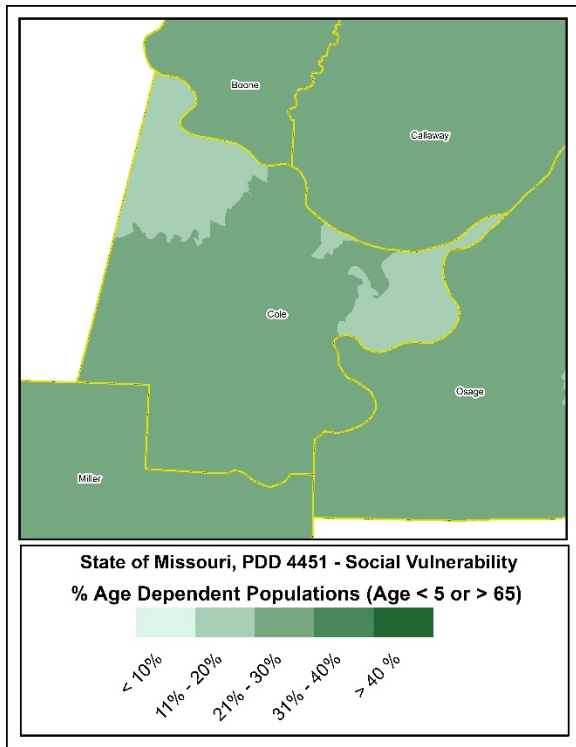


Figure 15. Percent population characterized as “age dependent” (age < 5 or > 65) by census tract – Cole County

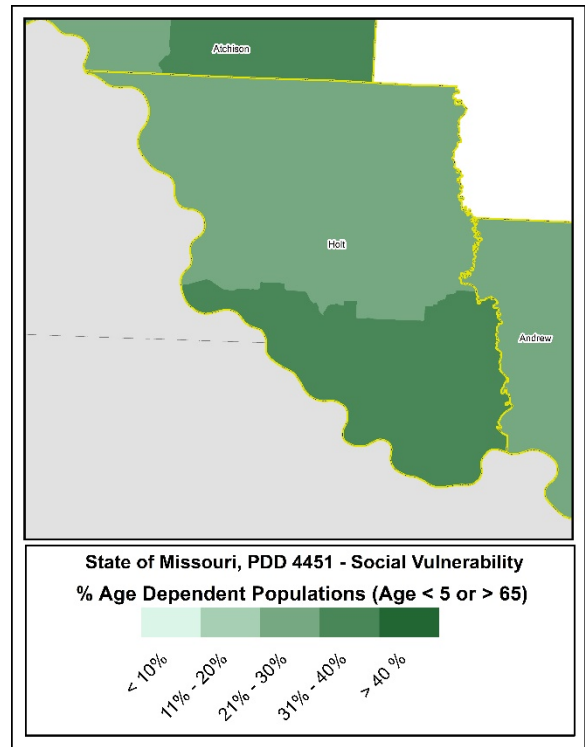


Figure 16. Percent population characterized as “age dependent” (age < 5 or > 65) by census tract – Holt County

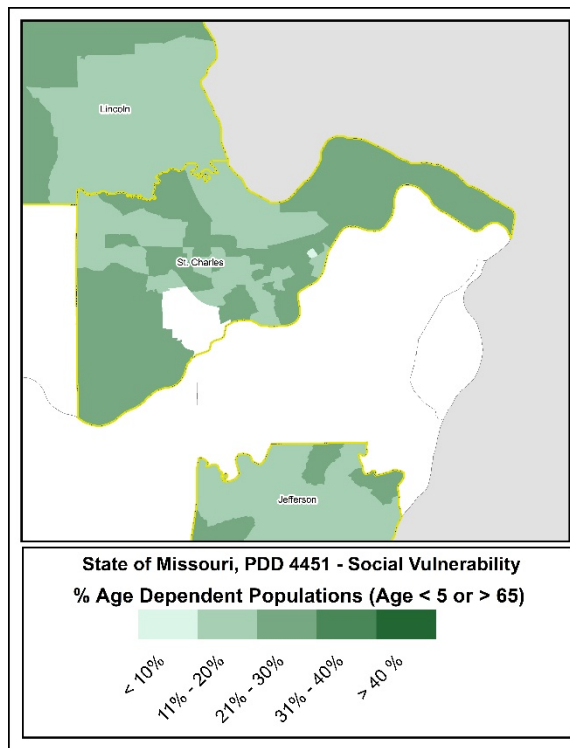


Figure 17. Percent population characterized as “age dependent” (age < 5 or > 65) by census tract – St. Charles County

Additionally, Social Vulnerability considers the percentage of the population living below poverty level. The map below (Figures 18 - 21) shows relative concentrations of poverty in the declared counties, with higher concentrations in Jackson, Boone, and Greene counties. Notably, Cole and St. Charles counties have some pockets of concentrated populations living below the poverty level. Figures 22 - 25 show larger concentrations of unemployment across the region. The maximum unemployment rate in the state is 50% and across the impacted counties the rate is generally 11 – 20% with few instances of higher unemployment.

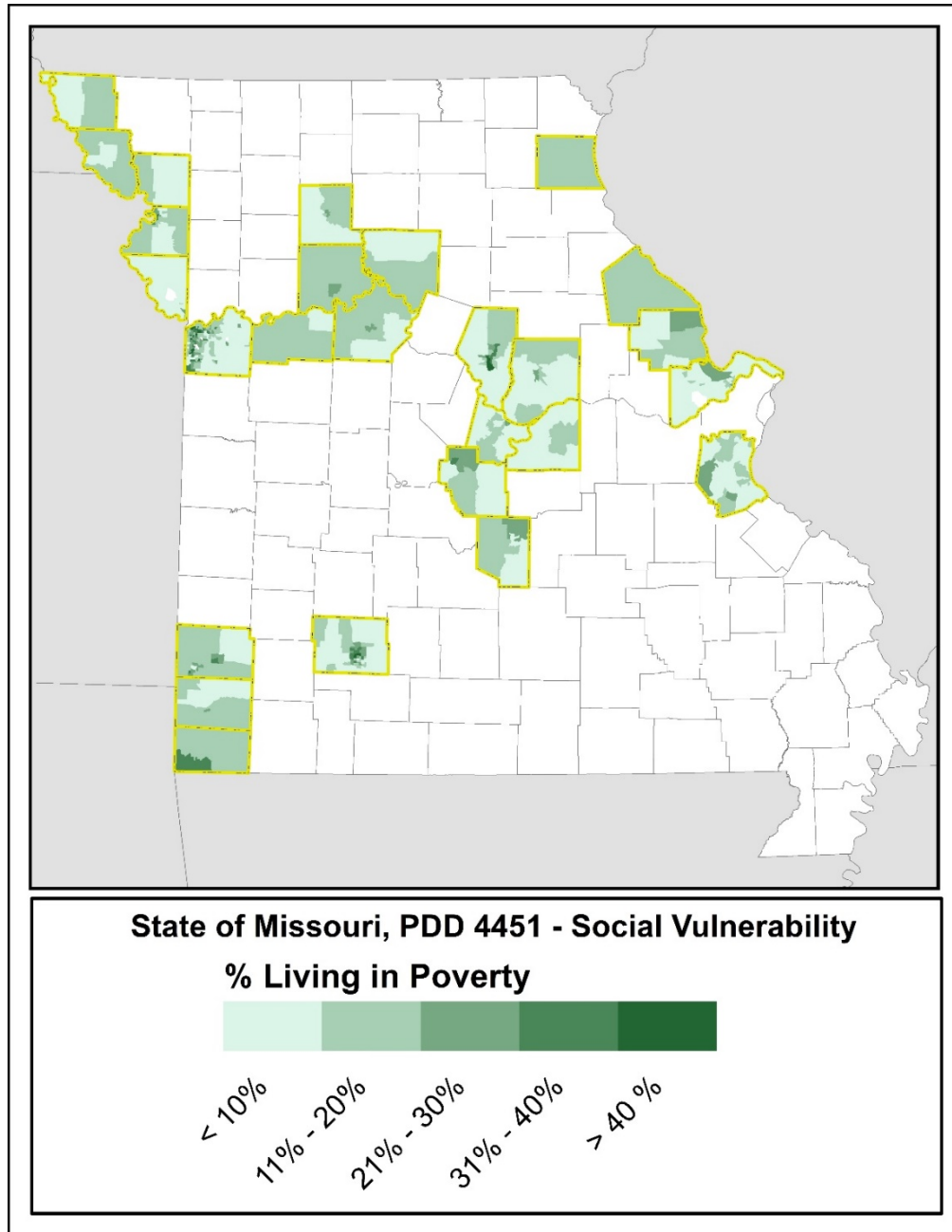


Figure 18: Percent persons living in poverty by census tract

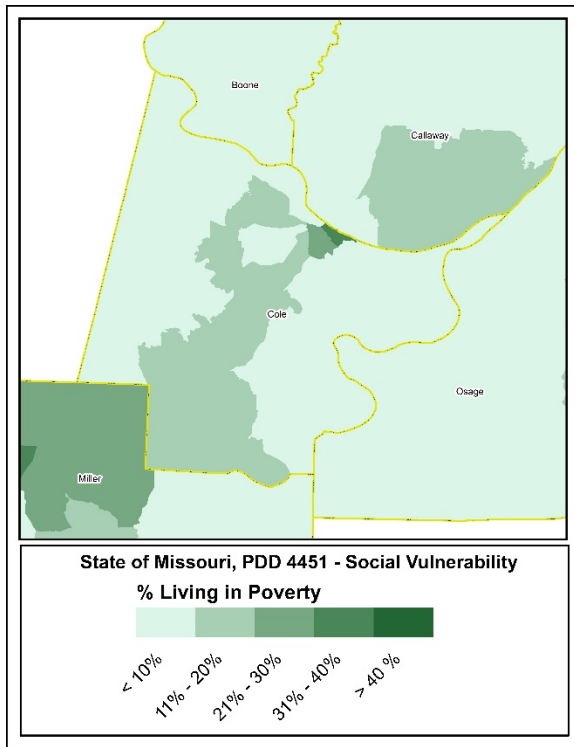


Figure 19. Percent persons living in poverty by census tract – Cole County

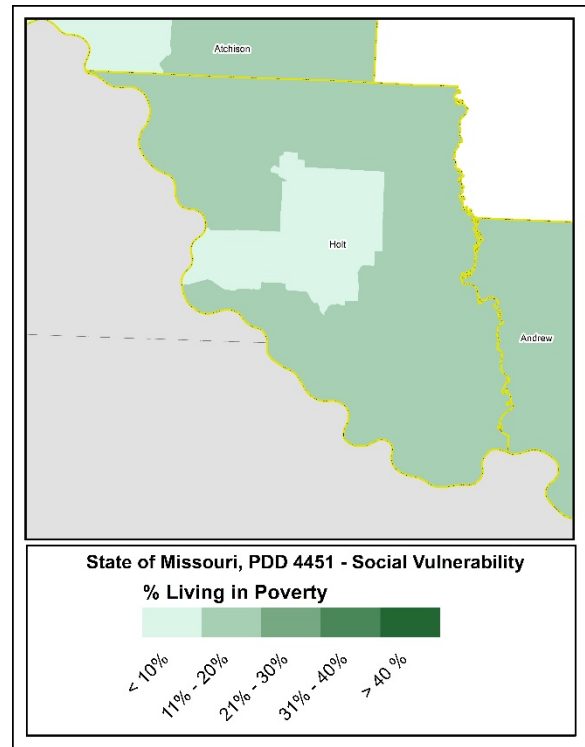


Figure 20. Percent persons living in poverty by census tract – Holt County

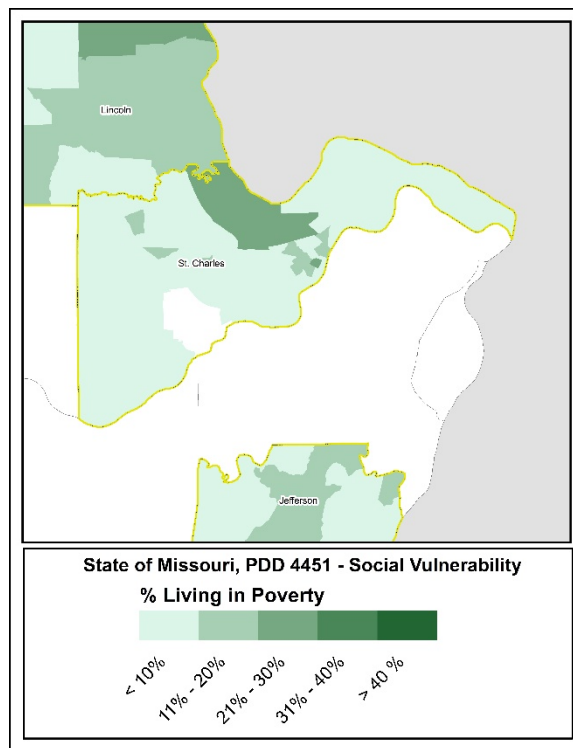


Figure 21. Percent persons living in poverty by census tract – St. Charles County

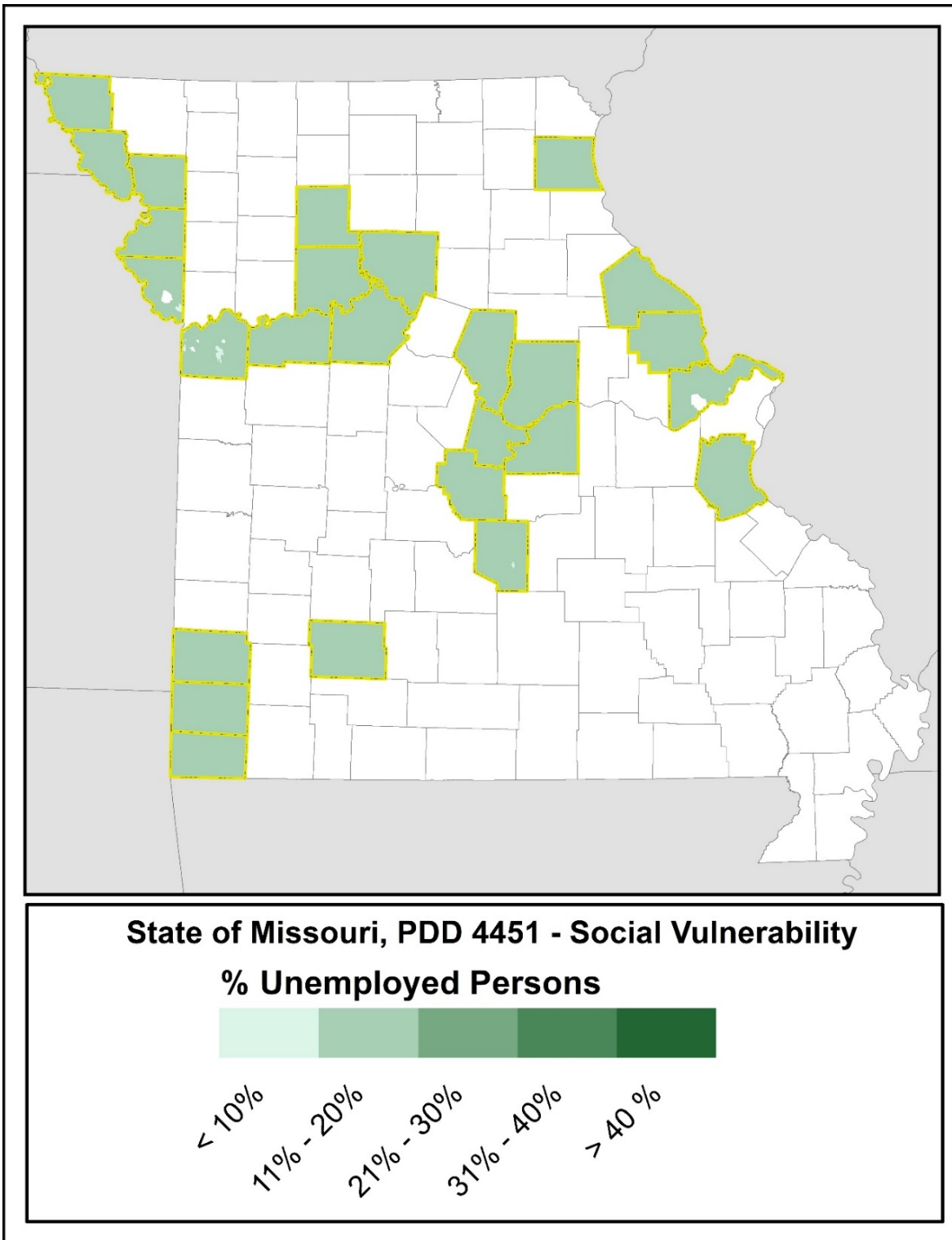


Figure 22. Percent of unemployed persons by census tract

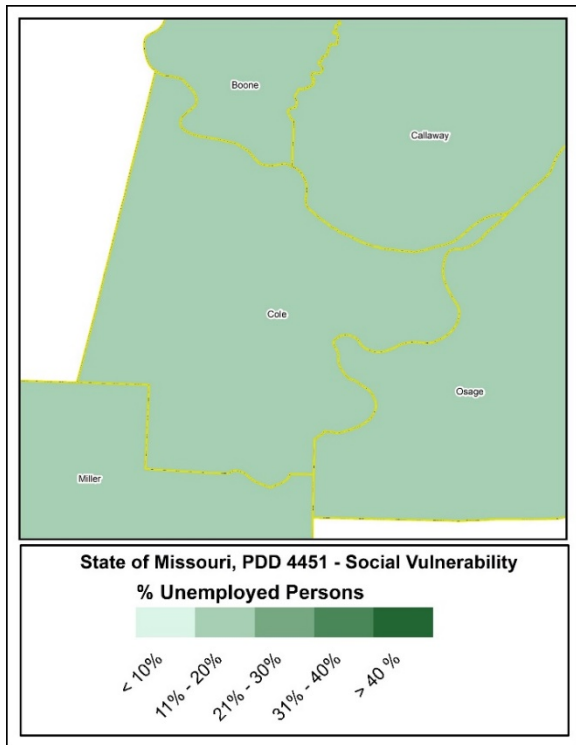


Figure 23. Percent unemployment poverty by census tract – Cole County

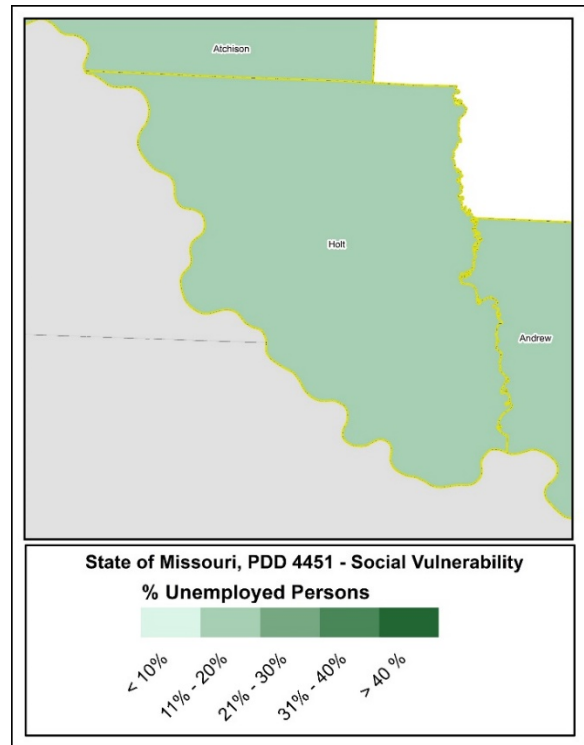


Figure 24. Percent unemployment poverty by census tract – Holt County

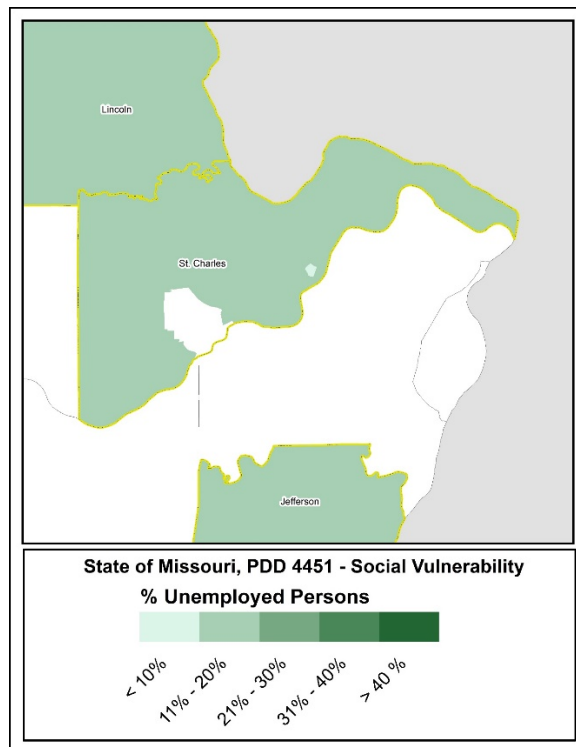


Figure 25. Percent unemployment poverty by census tract – St. Charles County



## 8.6 Transitional Housing/Homelessness

The multiple threats from flooding, tornadoes, powerful straight-line winds, and torrential rains in Missouri in 2019 impacted community members across all walks of life. While some may lose homes, others affected may be without homes both prior and following an event of such magnitude. In fact, homeless persons may be faced with even more adversity as others become displaced and shelters become more overcrowded.

Homelessness in the DED-identified MID counties of Holt and Cole represent a small segment of Missouri's overall homeless population. The Governor's Committee to End Homelessness (GCEH) website (<https://www.endhomelessnessmo.org/data>) provides a platform to view published data on Point in Time studies conducted by Missouri's Continuum of Care entities across the State.

According to a 2019 Point-In-Time report from the Missouri Housing Development Commission, federally mandated by HUD, there were 5,883 homeless people in Missouri in 2018, a 2% decrease from 2017.<sup>40</sup> Of the 5,883 homeless, approximately 2,107 are families, and about 21% of the homeless are considered to be unsheltered. Homelessness is experienced by more males (56%) than females (44%), and more whites experience homelessness (53%) than blacks (40%) and other races (7%). About 1,043 people (18%) who experienced homelessness in Missouri in 2018 were chronically homeless.

Through the years pre-disaster 2017-2019, Holt County recorded 0 homeless persons in the annual point in time count, while Cole County saw numbers rise from 50 in 2017 to 69 in 2018, and fall to 64 in 2019. St. Charles County conducts annual PIT counts in consortium with surrounding Warren and Lincoln Counties. Total homeless across the three counties participating in the St. Charles Continuum of Care PIT fell from 578 in 2017; to 532 in 2018, and 438 in 2019. Notably, the data indicates that only Cole County saw an overall increase in the homeless population in 2017-2019.

In light of the data on homelessness in the DED-identified MID counties, Missouri will require that MID UGLGs include UGLGs include in their proposal specific programs or activities that will result in the prevention of homelessness, including the provision of 2-1-1 homelessness prevention coordinated entry resources.

## 8.7 Emergency Shelters

Displaced residents, impacted by tornadoes, and evacuations ordered for Missouri's floodplain residents filled hotels, motels, homes of friends and families, as well as public shelters across the state. The Missouri Chapter of the American Red Cross operated eight (8) shelters throughout the state at the peak of sheltering needs in mid-June 2019.<sup>41</sup> The State along with various churches, charitable groups, and schools stepped up quickly to help their fellow Missourians. In total, 130 shelters in 33 counties housed an average of 775 people per night and a maximum of 6,148 people in any one night.

## 9. Enhanced Focus on Vulnerable Populations

Missouri is taking a cutting-edge approach to its disaster recovery process by assessing social vulnerability as part of its recovery strategy. A social vulnerability index utilizing the most recent census data (2014-2018) measures the social vulnerability of all census tracts with population in the PDR-4451 area of interest. The index is a comparative metric facilitating examination of differences in social

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<sup>40</sup> [http://www.mhdc.com/ci/Missouri%20Homelessness%20Study\\_Final\\_11.18.19.pdf](http://www.mhdc.com/ci/Missouri%20Homelessness%20Study_Final_11.18.19.pdf)

<sup>41</sup> <https://www.redcross.org/local/missouri/about-us/news-and-events/news/eight-shelters-now-open-in-missouri.html>

vulnerability across census tracts, the building blocks of counties. It graphically illustrates the variation in social vulnerability across the DR-4451 impact area, shows where there is uneven capacity for preparedness and response, and helps pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery.

Utilizing social vulnerability is also useful as an indicator in determining the differential recovery from disasters. The social vulnerability index synthesizes socioeconomic variables, which the research literature suggests contributes to reduction in a community's ability to prepare for, respond to, and recover from hazards. An outline of the variables influential in vulnerability for DR-4451 Individual Assistance declared counties is shown in Table 13. Missouri defines its vulnerable populations as:

- Low to Moderate Income (LMI) households- households with incomes below 80% of the county's Average Median Income (AMI)
- Households with children 5 years of age and under
- Single parent households
- Households with Citizens 65 years of age or older
- Female head of household
- Households with disabled or special needs members

The Social Vulnerability Index (table 13) has high utility as a decision-support tool for emergency management. The social vulnerability index metric turns historical disaster impact measures into actionable information for emergency managers, recovery planners, and decision makers. It empirically measures and visually depicts a population's (in) ability to adequately prepare for, respond to, and rebound from disaster events. Operationally, Social vulnerability assessment is now part of FEMA's Geospatial Framework, the set of spatial products delivered automatically by FEMA upon Presidential Disaster Declaration. Figure 26 and Figure 27 depict social vulnerability for the counties in DR-4451.

While these provide a general understanding of social vulnerability across the DR-4451 IA counties the size of census tracts dictates a deeper look into maps of individual counties. Figures 28 - 30 provide a detailed view of social vulnerability for Cole Holt, and St. Charles Counties. APPENDIX F provides detailed social vulnerability maps for all remaining DR-4451 IA Counties. Notably, Cole and St. Charles Counties' data reflects primarily "Low" to "Medium Low" levels of social vulnerability, with small pockets of "Medium High" or "High" social vulnerability (Figure 27, 28 and 30). Holt County reflects "Medium" to "Medium High" levels (Figure 27, 29). As noted, the constraint on understanding the geographical nuance in Holt County relative to social vulnerability stems from the data's reliance on Census Tract modeling.

Recognizing this limitation in the data, proposals received from UGLGs on the use of CDBG-DR dollars in the MID should include samples of resources available to beneficiaries in order to complement the activities intended to address housing. Examples may include resources on housing counselling, legal counselling, job training, mental health support, and general health services. Proposals should include a description of how information about those resources will be made accessible to individuals to wide-ranging disabilities (which may include mobility, sensory, developmental, emotional, and other impairments).

Table 13. DR-4451, Social Vulnerability Component Matrix<sup>42</sup>

PDD 4451 - Missouri Tract Level 2014 - 2018 Social Vulnerability Component Summary					
Component	Cardinality	Description	% Variace Explained	Dominant Variables	Variable Component Loading
1	+	Wealth and Poverty	15.63	PERCAP	-0.841
				QRICH200K	-0.826
				MHSEVAL	-0.771
				MDGRENT	-0.762
				QCVLUN	0.404
				UNINSURED	0.444
				QMOHO	0.448
				QPOVTY	0.455
				QSERV	0.469
				QED12LES	0.491
2	+	Race (Black) and Single Parent Households	15.19	QFAM	-0.691
				MHSEVAL	-0.406
				QED12LES	0.426
				QSERV	0.461
				QPOVTY	0.470
				QCVLUN	0.556
				QFHH	0.650
				QUNOCCHU	0.667
				QNOAUTO	0.714
				BLACK	0.860
3	+	Age (Old)	11.18	QRENTER	-0.548
				MEDAGE	0.827
				QAGEDEP	0.854
				QSSBEN	0.864
4	+	Ethnicity (Hispanic)	9.92	QHISP	0.884
				UNINSURED	0.460
				QED12LES	0.611
				QESL	0.881
5	+	Gender (Female) and Housing Burden	7.74	QEXTRCT	-0.499
				HOUSEBURDEN	0.400
				QFHH	0.414
				QFEMLBR	0.709
				QFEMALE	0.796
6	+	Special Needs Populations	6.71	QPUNIT	-0.813
				QNOAUTO	0.417
				QRENTER	0.558
				QNRRES	0.600
7	+	Race (Asian) and Lack of Insurance	4.78	UNINSURED	0.430
				QASIAN	0.829
Cummulative Variance Explained			71.15		
29 variabels, tract with 0 population or 0 housing units excluded					

<sup>42</sup> Component scores and composite social vulnerability scores in the accompanying maps are relative and comparable across census tracts within DR 4451 IA declared counties of Missouri. The cardinalities of components in the accompanying shapefile have been adjusted as indicated above. The social vulnerability composite score is obtained by summing all component scores. Input data are derived from the Five-Year American Community Survey, 2014-18. Social vulnerability created using [www.vulnerabilitymap.org](http://www.vulnerabilitymap.org)

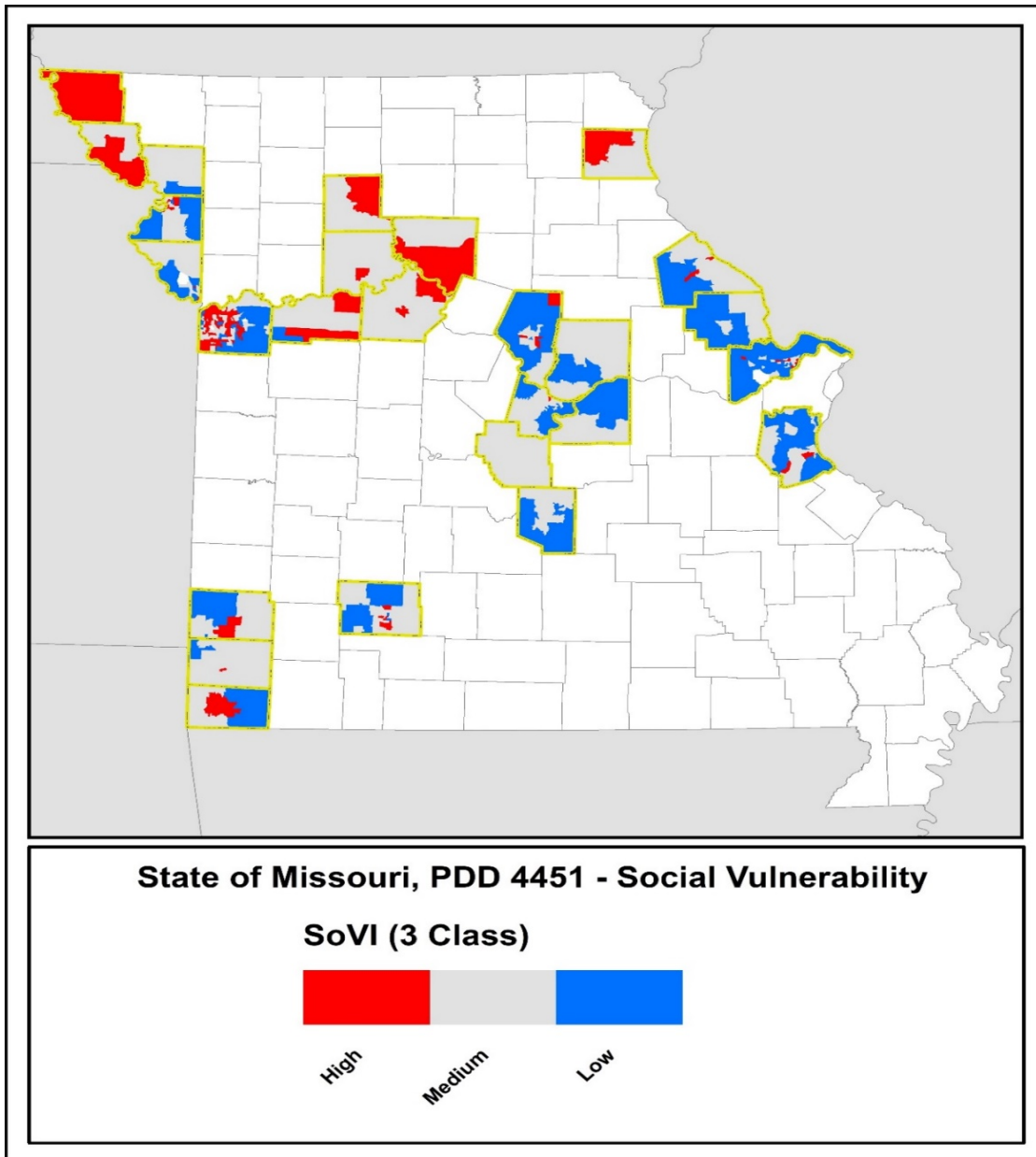


Figure 26. Tract level 3-Class Social Vulnerability Index (SoVI) for PDD 4451 IA Declared Counties

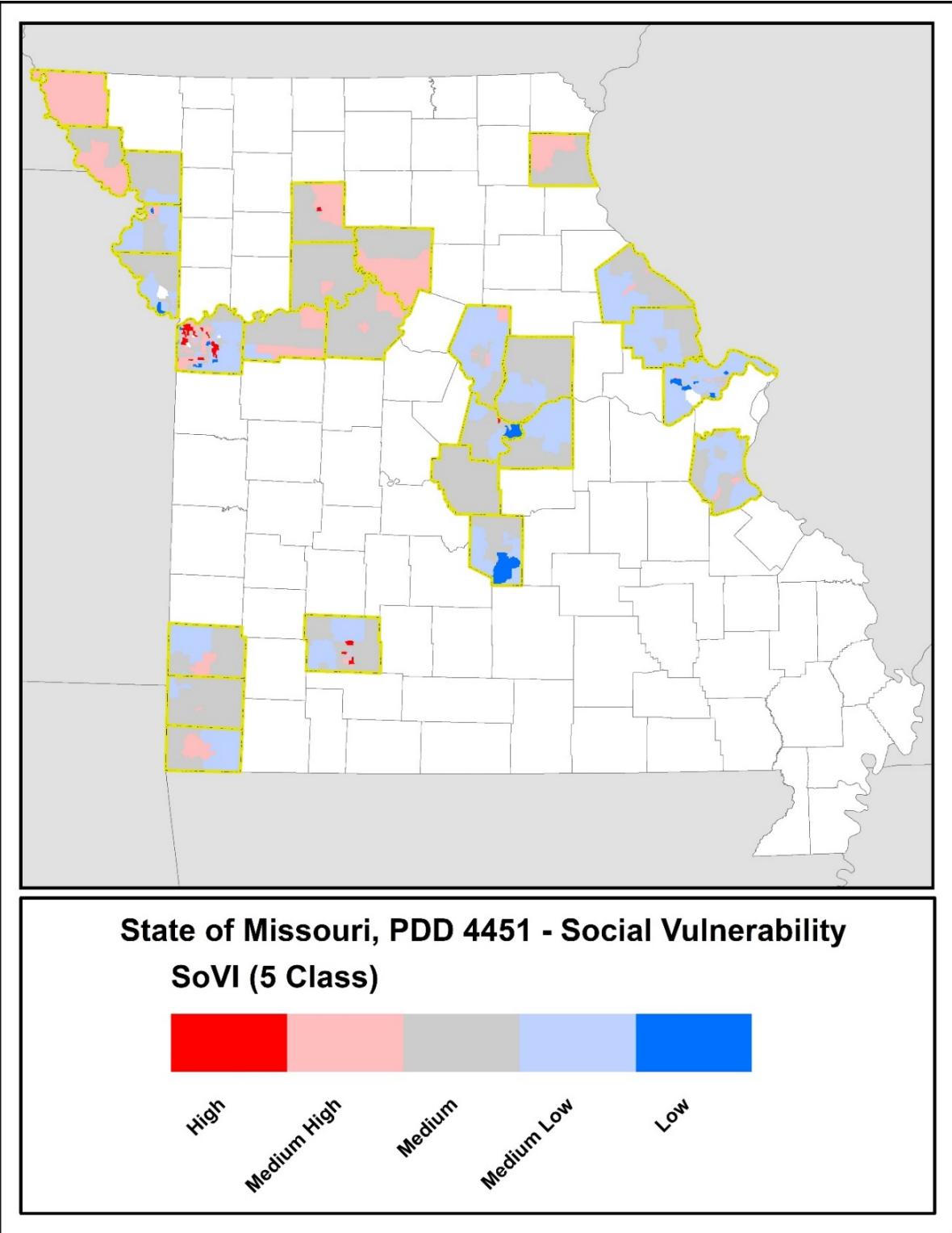


Figure 27. Tract level 5-Class Social Vulnerability Index (SoVI) for PDD 4451 IA Declared Counties

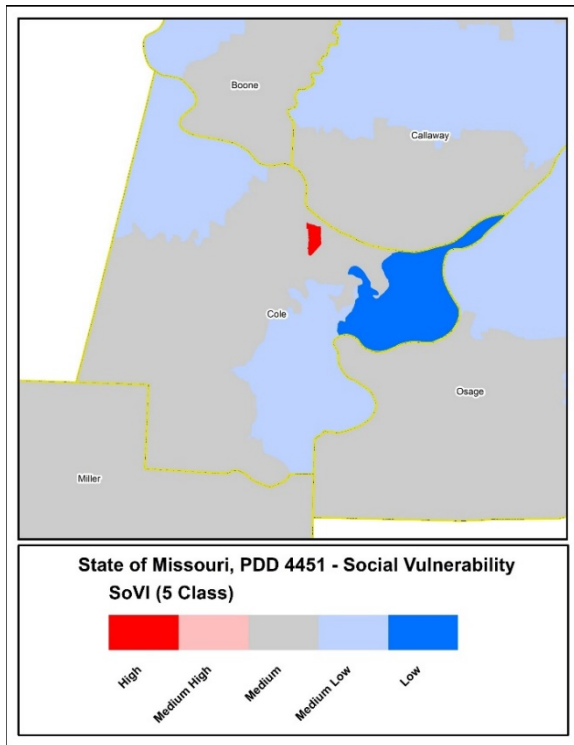


Figure 28. Tract level 5-class social vulnerability index (SoVI) for PDD 4451 – Cole County

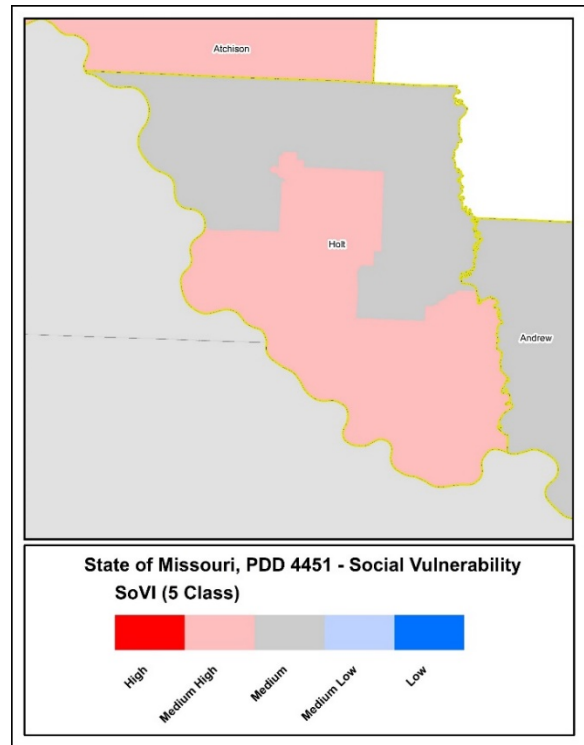


Figure 29. Tract level 5-class social vulnerability index (SoVI) for PDD 4451 – Holt County

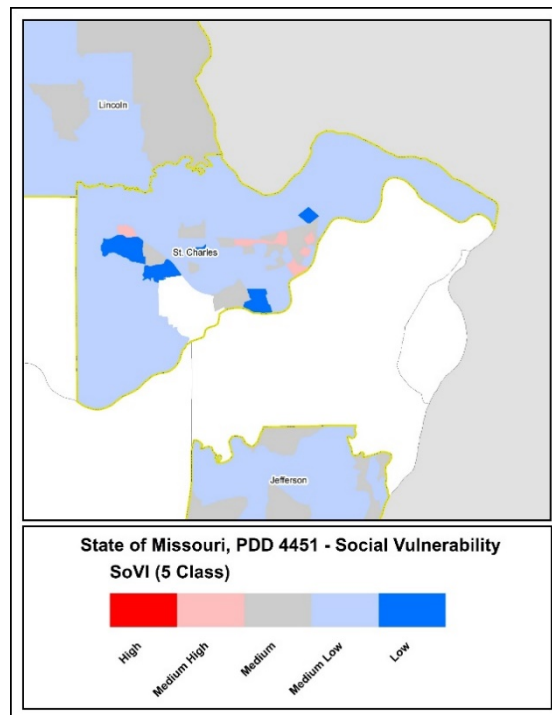


Figure 30. Tract level 5-class social vulnerability index (SoVI) for PDD 4451 – St. Charles County

## 10. Civic Engagement

Voluntary Organizations Active in Disasters (VOAD), philanthropic organizations, and faith-based organizations are often the first line of defense when it comes to community recovery. Following the devastating flooding in March and subsequent tornado and severe weather in May 2019, the citizens of Missouri pulled together to embark on the recovery process. Instead of waiting for government assistance, volunteers led the charge to assist individuals and communities with recovery efforts. Many VOADs are still onsite and working to help rebuilding efforts from the 2019 floods and severe weather. Even today, the Missouri VOAD community continues to coordinate relief efforts across numerous organizations, including multiple state agencies and federal government officials.

Immediately following the May 23 EF3 tornado, Missouri's Convoy of Hope deployed two teams to assist with damage and needs assessments. While monitoring rising floodwaters in multiple parts of the state, Convoy of Hope distributed water, food, bug spray, plastic totes, and clean-up supplies across the disaster impacted area. Working with Disaster Services and Hands of Hope, Convoy of Hope coordinated the delivery of more than 1,000 bags of groceries in Hartville, Missouri in response to a tornado there. As floodwater impacted much of the state into early June 2019, Convoy of Hope sustained its assistance, delivering two-week's worth of food rations to Hartville residents who were unable to travel to purchase groceries. As Convoy of Hope supplied totes and boxes to residents of a Jefferson City apartment complex that was destroyed by the EF3 tornado. Convoy of Hope also distributed food and relief supplies to victims across the disaster effected area in early June 2019.<sup>43</sup>

In similar fashion, University of Missouri Health Care pledged up to \$50,000 in financial support to survivors of the tornadoes and encouraged faculty, staff, and students to volunteer. The University of Missouri's Police Department helped monitor traffic in the damaged areas, and members of the Mizzou baseball team assisted with cleaning up the site for the Missouri Special Olympics. The University of Missouri Extension program also established a wellness and recreation center in Jefferson City to offer support to survivors.<sup>44</sup> Meanwhile, the Missouri Chapter of the American Red Cross (ARC) facilitated more than 490 volunteers to support eight (8) shelters for survivors of the tornadoes and floods, providing more than 1,500 overnight shelter stays for individuals and families, more than 32,200 meals and snacks, 850 health and mental health contacts, and distribution of more than 22,400 relief items.<sup>45</sup> The ARC also hosted a Multi-Agency Resource Center (MARC) in Jefferson City to provide resources ranging from mental health to agriculture and legal services with more than 30 agencies in attendance.<sup>46</sup> Lastly, the State Emergency Management Agency (SEMA) established MARCs in Jefferson City and other disaster affected areas serving more than 600 households affected by the severe storms in Spring 2019.<sup>47</sup>

These organizations, as well as countless individual volunteers, have been dedicated to providing relief services to those affected. Projects including mold remediation that will not only allow individuals to safely remain in their homes but will also allow for the completion of home rehabilitation.

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<sup>43</sup> <https://www.convoyofhope.org/blog/features/disaster-response/convoy-hope-responds-tornadoes-flooding-missouri-oklahoma/>

<sup>44</sup> <https://news.missouri.edu/2019/neighbors-helping-neighbors/>

<sup>45</sup> <https://www.redcross.org/local/missouri/about-us/our-work/tornadoes-and-floods-response-and-relief.html>

<sup>46</sup> <https://www.komu.com/news/multi-agency-resource-center-open-to-tornado-victims>

<sup>47</sup> [https://sema.dps.mo.gov/maps\\_and\\_disasters/disasters/4451.php](https://sema.dps.mo.gov/maps_and_disasters/disasters/4451.php)

## 11. Summary of Impact and Unmet Need

The Unmet Needs Assessment must evaluate the three core aspects of recovery – housing, infrastructure, and economic development. It must approximate unmet need by estimating the portion of need likely to be addressed by insurance proceeds, other federal assistance, or any other funding source by using the most recent available data.

**The preliminary estimated impact from DR-4451 in Missouri is \$142,387,426 across the housing, economy, and infrastructure sectors combined.** The figures provided in this assessment are based on best available data at this time and may be adjusted in the future as additional data becomes available. After considering the funds already made available through insurance, state and other federal assistance and other funds totaling more than \$33.7 million, the remaining overall unmet need is approximately \$109 million. **The federal allocation of \$30 million will allow the State to address about 28% of the remaining unmet need.**

When examining the relative need by sector (Figure 31 and Table 14), housing represents the greatest need with \$79,242,344 (73% of total) in unmet need, followed by the economic sector with \$26,391,345 (24%) of total in unmet need, followed by the infrastructure sector with 3,099,641 (3% of total) unmet need. Each of these three sectors will be addressed in greater detail in the following sections.

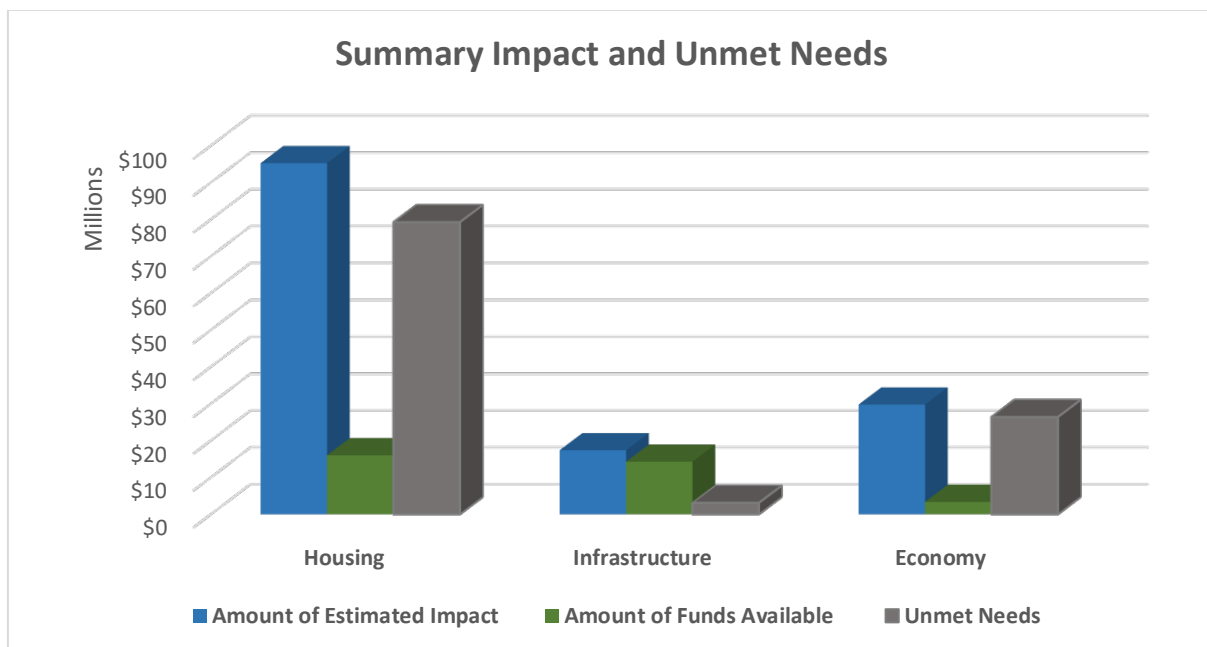


Figure 31. Unmet Need Summary

Table 14. Summary of Impacts/Support by Sector

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$95,258,657	\$17,368,924	\$29,759,845	\$142,387,426
Amount of Funds Available	\$16,016,313	\$14,269,283	\$3,368,500	\$33,654,096
Unmet Needs	\$79,242,344	\$3,099,641	\$26,391,345	\$108,733,330
Percent of Total	72.88%	2.85%	24.27%	



## 12. Housing Impact

Impacts to housing from flooding, tornadoes, and severe weather were widespread. Single family homeowners in stick-built homes, single family homeowners in mobile homes, and renters in various housing types of housing stock were affected. Table 15 and Table 16, below, show the FEMA Full Verified Loss (FVL) determinations in the impacted counties by owner and renter.

Table 15. DR-4451 FEMA IA Owner Applicant Summary by County<sup>48</sup>

County	# of Valid Registrants	Total Inspected	% Inspected	Count with FEMA Inspected Damage	% with FEMA Inspected Damage	Total Damage	Average Damage
<i>Cole</i>	221	99	44.80%	85	85.86%	\$1,332,143	\$15,672
<i>Holt</i>	214	167	78.04%	109	65.27%	\$990,610	\$9,088
<i>St. Charles</i>	455	381	83.74%	347	91.08%	\$4,643,469	\$13,382
<i>Andrew</i>	129	108	83.72%	81	75.00%	\$308,727	\$3,811
<i>Atchison</i>	49	41	83.67%	23	56.10%	\$143,090	\$6,221
<i>Boone</i>	10	10	100.00%	7	70.00%	\$87,816	\$12,545
<i>Buchanan</i>	93	90	96.77%	74	82.22%	\$526,980	\$7,121
<i>Callaway</i>	19	18	94.74%	16	88.89%	\$54,570	\$3,411
<i>Carroll</i>	65	44	67.69%	34	77.27%	\$183,471	\$5,396
<i>Chariton</i>	73	55	75.34%	42	76.36%	\$376,590	\$8,966
<i>Greene</i>	70	46	65.71%	36	78.26%	\$278,090	\$7,725
<i>Jackson</i>	131	124	94.66%	83	66.94%	\$762,420	\$9,186
<i>Jasper</i>	149	82	55.03%	67	81.71%	\$305,028	\$4,553
<i>Jefferson</i>	17	17	100.00%	12	70.59%	\$59,906	\$4,992
<i>Lafayette</i>	14	13	92.86%	10	76.92%	\$44,892	\$4,489
<i>Lewis</i>	16	13	81.25%	12	92.31%	\$102,406	\$8,534
<i>Lincoln</i>	116	105	90.52%	91	86.67%	\$1,412,499	\$15,522
<i>Livingston</i>	25	24	96.00%	18	75.00%	\$245,029	\$13,613
<i>McDonald</i>	77	69	89.61%	55	79.71%	\$565,719	\$10,286
<i>Miller</i>	81	34	41.98%	30	88.24%	\$215,764	\$7,192
<i>Newton</i>	61	58	95.08%	52	89.66%	\$200,933	\$3,864
<i>Osage</i>	17	16	94.12%	12	75.00%	\$37,729	\$3,144
<i>Pike</i>	70	55	78.57%	50	90.91%	\$398,741	\$7,975
<i>Platte</i>	17	16	94.12%	10	62.50%	\$31,156	\$3,116
<i>Pulaski</i>	20	18	90.00%	13	72.22%	\$114,347	\$8,796
<i>Saline</i>	8	8	100.00%	4	50.00%	\$16,454	\$4,114
<b>Grand Total</b>	<b>2217</b>	<b>1711</b>	<b>77.18%</b>	<b>1373</b>	<b>80.25%</b>	<b>\$13,438,579</b>	<b>\$9,788</b>

<sup>48</sup> <https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1>

Table 16. DR-4451 FEMA IA Renter Applicant Summary by County<sup>49</sup>

County	# of Applicants	Number Inspected	% Inspected	% with FEMA Inspected Damage	% with No FEMA Damage	Total with Moderate Damage	Total with Major Damage	Total with Substantial Damage
<i>Cole</i>	253	188	74.31%	44.15%	55.85%	57	26	0
<i>Holt</i>	69	68	98.55%	61.76%	38.24%	41	1	0
<i>St. Charles</i>	92	78	84.78%	70.51%	29.49%	39	16	0
<i>Andrew</i>	13	11	84.62%	36.36%	63.64%	4	0	0
<i>Atchison</i>	13	10	76.92%	40.00%	60.00%	4	0	0
<i>Boone</i>	8	6	75.00%	66.67%	33.33%	4	0	0
<i>Buchanan</i>	20	18	90.00%	33.33%	66.67%	6	0	0
<i>Callaway</i>	3	2	66.67%	50.00%	50.00%	1	0	0
<i>Carroll</i>	19	9	47.37%	55.56%	44.44%	5	0	0
<i>Chariton</i>	10	9	90.00%	88.89%	11.11%	8	0	0
<i>Greene</i>	4	3	75.00%	33.33%	66.67%	1	0	0
<i>Jackson</i>	31	27	87.10%	44.44%	55.56%	11	1	0
<i>Jasper</i>	8	7	87.50%	28.57%	71.43%	1	1	0
<i>Jefferson</i>	4	4	100.00%	25.00%	75.00%	1	0	0
<i>Lafayette</i>	1	0	0.00%	100.00%	0.00%	0	0	0
<i>Lewis</i>	1	1	100.00%	100.00%	0.00%	0	1	0
<i>Lincoln</i>	44	40	90.91%	57.50%	42.50%	18	5	0
<i>Livingston</i>	3	2	66.67%	50.00%	50.00%	1	0	0
<i>McDonald</i>	12	11	91.67%	63.64%	36.36%	7	0	0
<i>Miller</i>	74	55	74.32%	45.45%	54.55%	21	4	0
<i>Newton</i>	26	23	88.46%	34.78%	65.22%	8	0	0
<i>Osage</i>	1	1	100.00%	0.00%	100.00%	0	0	0
<i>Pike</i>	20	19	95.00%	68.42%	31.58%	12	1	0
<i>Platte</i>	2	2	100.00%	0.00%	100.00%	0	0	0
<b>Grand Total</b>	<b>731</b>	<b>594</b>	<b>81.26%</b>	<b>51.52%</b>	<b>48.48%</b>	<b>250</b>	<b>56</b>	<b>0</b>

### 12.1 Housing Types Affected

More than 3,000 applicants filed for FEMA (IA) Individual Assistance statewide because of the 2019 floods, tornadoes, and severe weather damages. Of those who specified housing unit type, about 74% are homeowners, including single family homes, duplex units, mobile homes, and other housing types (Table 17). The remaining 26% are renters, including renters of single-family homes, mobile homes, apartment units and other housing types (see Appendix J: DR-4451 County Median House Value, Appendix K: DR-4451 County Housing Tenure, and Appendix M: DR-4451 County Mobile Homes for detailed county-by-county maps of housing values, tenure, and by mobile homes). Of Cole County's 483 applicants (about 16% of all applicants), about 229 applicants owned their homes (7%) and about 254 applicants (8.5%) rented their homes when disaster struck in 2019, the most of the three most impacted

<sup>49</sup> <https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1>

counties. In St. Charles County, however, more homeowners applied for IA, with 463 applicants (15.4%) owning their homes and 92 applicants (3%) renting. Holt County had 220 homeowner applicants (7.3%) and about 69 renter applicants (2.3%) (Table 18).

Table 17. DR-4451 FEMA IA Applicants by Ownership Type<sup>50</sup>

<b>Housing Type</b>	<b>Owner</b>	<b>Renter</b>	<b>Unknown</b>	<b>Grand Total</b>
<i>Apartment</i>	5	254	1	260
<i>Boat</i>	4	-	1	5
<i>Condo</i>	1	-	-	1
<i>House/Duplex</i>	1,788	379	29	2,196
<i>Mobile Home</i>	223	40	6	269
<i>Townhouse</i>	6	2	-	8
<i>Travel Trailer</i>	42	13	1	56
<i>Other</i>	153	45	11	209
<b>Grand Total</b>	<b>2,222</b>	<b>733</b>	<b>49</b>	<b>3,004</b>

Table 18. DR-4451 FEMA IA Owner Applicants by Tenure and County

<b>County</b>	<b>Owners</b>				<b>Renters</b>			
	<b>House or Duplex</b>	<b>Apartment, Condo, Townhouse</b>	<b>Mobile Home, Travel Trailer</b>	<b>Other</b>	<b>House or Duplex</b>	<b>Apartment, Condo, Townhouse</b>	<b>Mobile Home, Travel Trailer</b>	<b>Other</b>
<i>Cole</i>	183	3	22	21	78	160	7	9
<i>Holt</i>	176	2	17	25	31	30	6	2
<i>St. Charles</i>	357	1	72	33	68	8	9	7
<i>Andrew</i>	104	-	23	7	11	-	2	-
<i>Atchison</i>	40	1	3	5	11	1	-	1
<i>Boone</i>	4	-	4	2	4	1	2	1
<i>Buchanan</i>	75	1	15	2	15	1	4	1
<i>Callaway</i>	13	-	5	3	2	-	-	1
<i>Carroll</i>	52	-	2	15	9	1	1	8
<i>Chariton</i>	63	-	7	10	10	-	-	-
<i>Greene</i>	65	-	3	2	5	-	-	-
<i>Jackson</i>	127	1	3	3	26	1	2	2
<i>Jasper</i>	136	-	12	2	7	-	1	-
<i>Jefferson</i>	13	-	2	2	4	-	-	-

<sup>50</sup> Source: OpenFEMA Dataset: Individuals and Households Program (IHP) Valid Registrations-  
<https://www.fema.gov/openfema-dataset-individuals-and-households-program-ihp-valid-registrations>

<i>County</i>	Owners				Renters			
	House or Duplex	Apartment, Condo, Townhouse	Mobile Home, Travel Trailer	Other	House or Duplex	Apartment, Condo, Townhouse	Mobile Home, Travel Trailer	Other
<i>Lafayette</i>	11	-	2	1	-	-	-	1
<i>Lewis</i>	15	-	1	-	1	-	-	-
<i>Lincoln</i>	102	-	16	4	28	-	13	2
<i>Livingston</i>	15	-	8	2	1	-	1	1
<i>McDonald</i>	53	1	18	7	11	-	1	-
<i>Miller</i>	65	2	8	7	14	50	2	8
<i>Newton</i>	53	-	6	2	22	3	1	-
<i>Osage</i>	13	-	2	2	1	-	-	-
<i>Pike</i>	53	1	8	9	18	-	1	1
<i>Platte</i>	14	-	2	1	2	-	-	-
<i>Pulaski</i>	9	-	11	-	-	-	-	-
<i>Saline</i>	6	-	-	2	-	-	-	-
<i>Grand Total</i>	1,817	13	272	169	379	256	53	45

### 12.1.1 Single Family

Median housing values range from over \$250,000 to well below \$50,000 in different regions of the state. Generally, higher home values are associated with metropolitan or urban areas of Missouri, with the high median house values occurring around some metro areas (Figure 32). In Cole County, higher home values are associated with the suburban areas of Eldon and Wardsville, while the urban areas of Jefferson City have lower median house values (Figure 33). Median house values in Holt County are generally uniform and lower value, averaging between \$75,000 and \$125,000 (Figure 34). Median house values in St. Charles County, however, are the highest of the three most impacted counties, with most census tracts having values over \$225,000 on average (Figure 35). St. Charles County does have an interesting disparity in median house values, however, with areas closest to the Mississippi River in eastern portions of the county having values lower than \$75,000 on average.

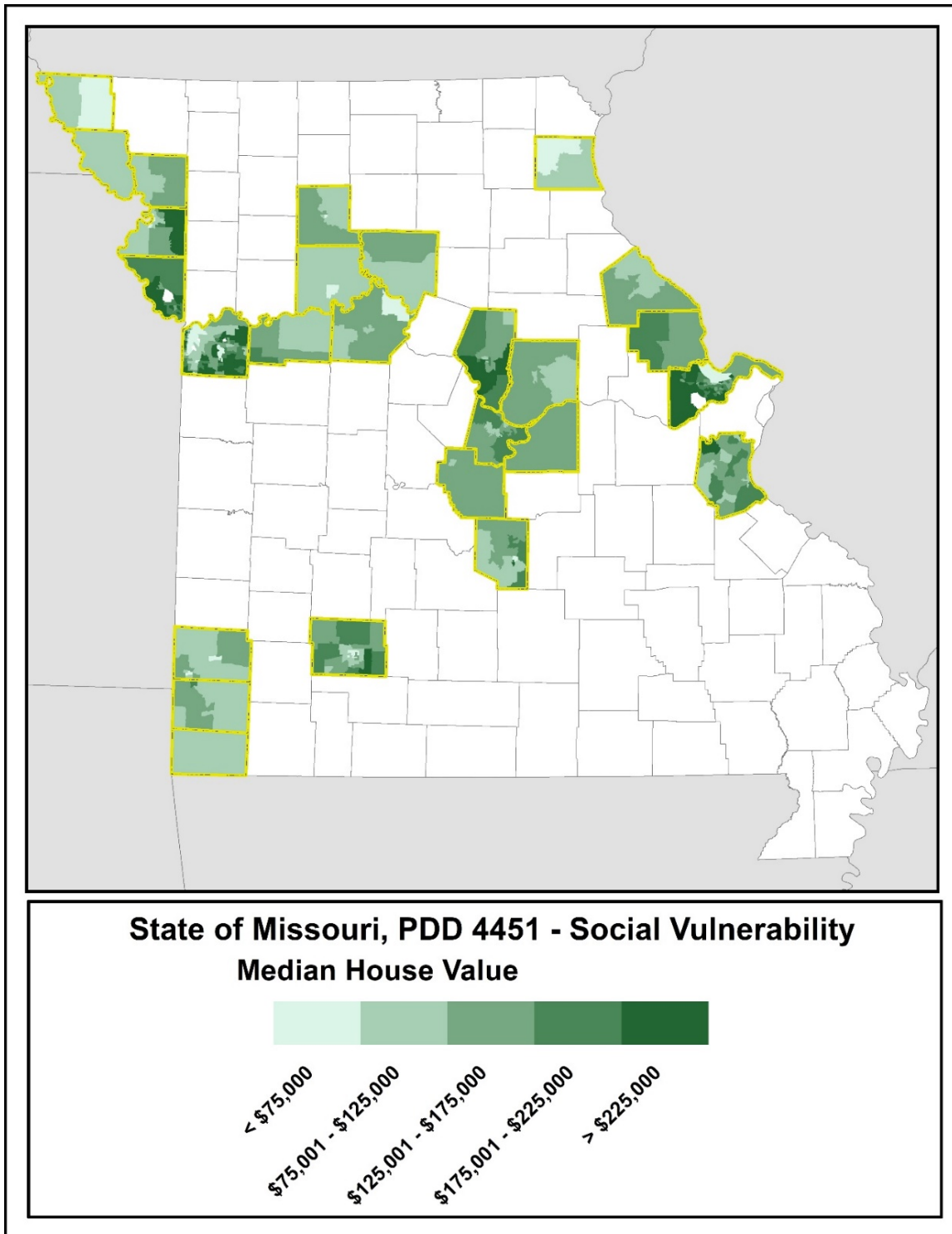


Figure 32. Median house value by census tract

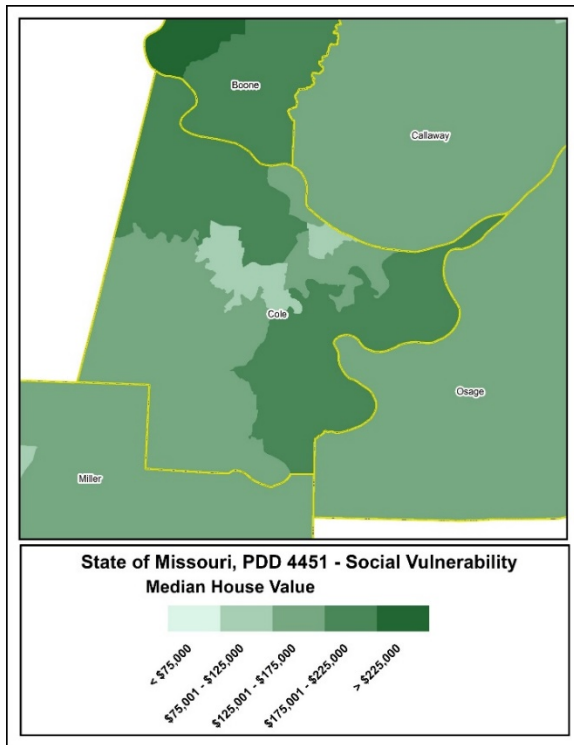


Figure 33. Median house value by census tract – Cole County

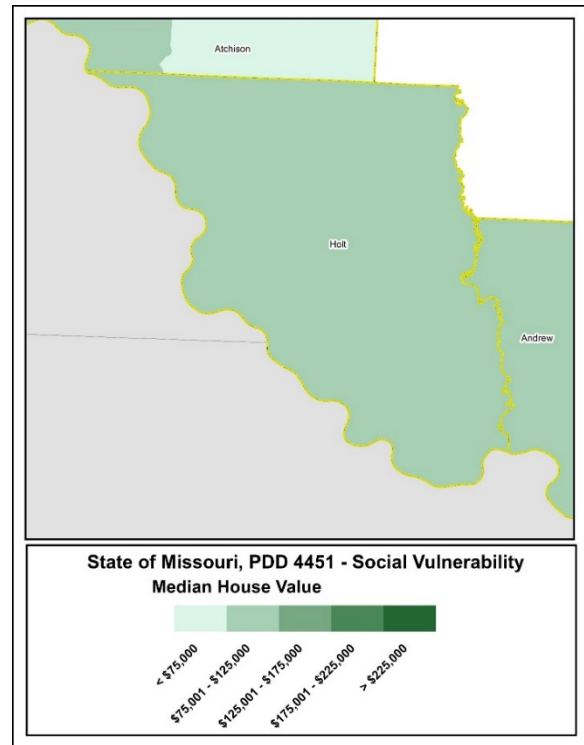


Figure 34. Median house value by census tract – Holt County

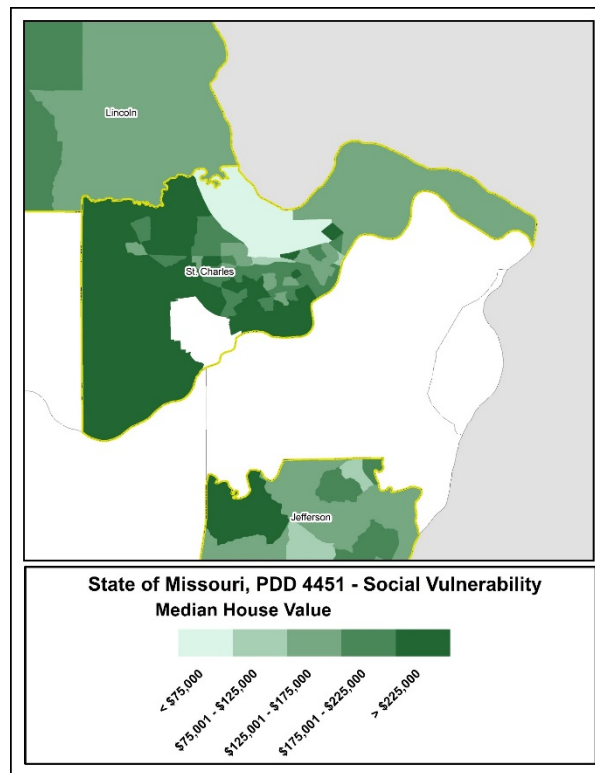


Figure 35. Median house value by census tract – St. Charles County

There are around 188,103 housing units in the most impacted areas of Cole, Holt, and St. Charles counties, with most of these housing units owned by residents (Figures 36 - 38). With much of the housing stock in the 30-year range (Table 19), key systems such as electrical, roofing, water heaters and furnaces may have already cycled through a replacement lifespan in many homes. Nearly 80% of homes in Holt County were built prior to 1989, compared to about 67% in Cole County and about 46% in St. Charles County. Though St. Charles County had the most housing units built in the 2000s, the three most impacted counties had an average of 3.4% increase in housing units since 2010.

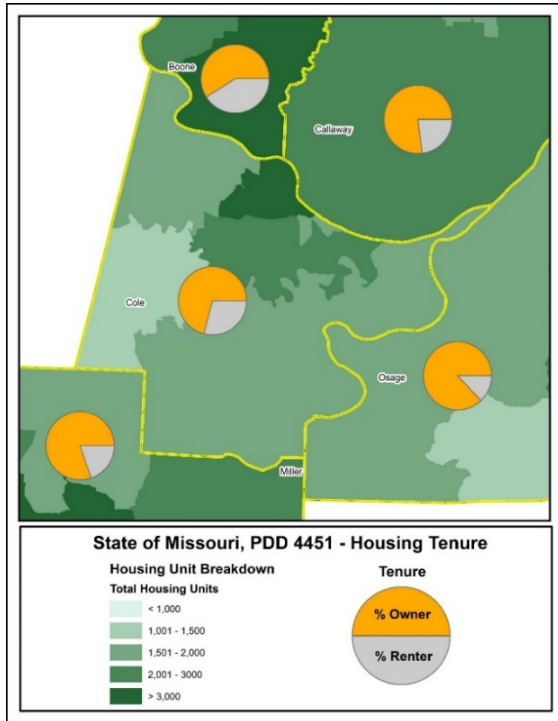


Figure 36. Housing stock count by tenure – Cole County

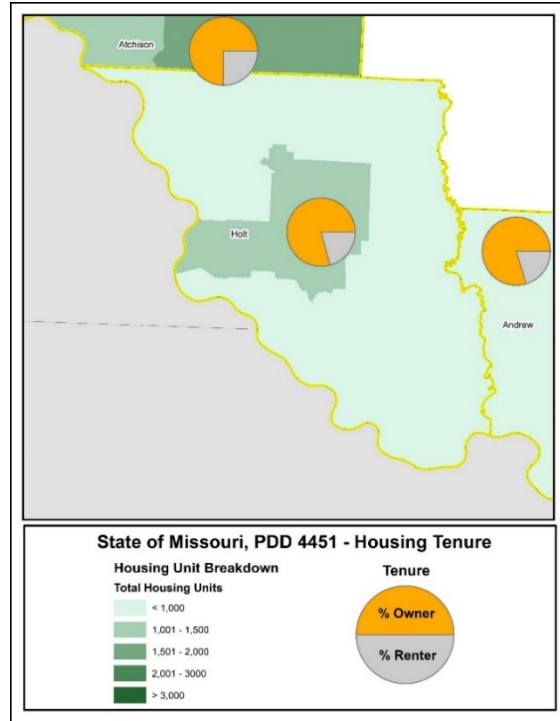


Figure 37. Housing stock count by tenure – Holt County

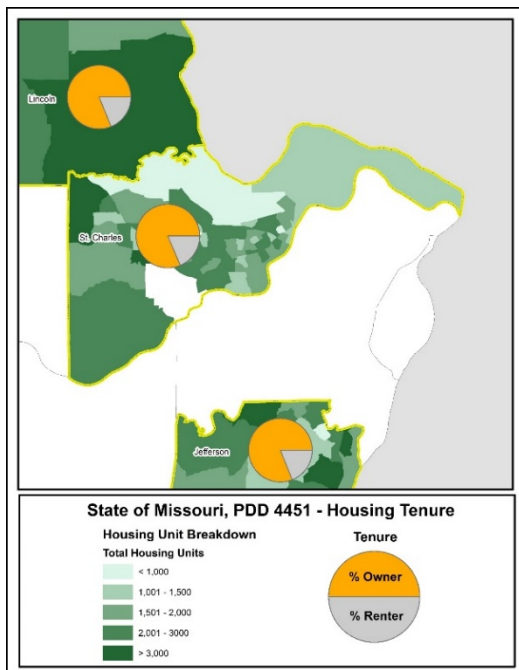


Figure 38. Housing Stock County by tenure – St. Charles County

Table 19. DR-4451, Age of Housing Stock: Percentage of Units by Year Built, by County<sup>51</sup>

<b>County</b>	<b>Total Housing Units</b>	<b>2010 or Newer</b>	<b>2000 - 2009</b>	<b>1990 - 1999</b>	<b>1970 -1989</b>	<b>Pre 1970</b>
<i>Cole</i>	33,210	4.16%	11.17%	18.40%	31.26%	35.00%
<i>Holt</i>	2,776	3.10%	7.67%	9.29%	21.90%	58.03%
<i>St. Charles</i>	152,117	7.17%	24.56%	22.26%	31.51%	14.51%
<i>Andrew</i>	7,321	5.42%	12.28%	15.61%	27.91%	38.78%
<i>Atchison</i>	2,959	0.41%	4.02%	5.88%	18.59%	71.11%
<i>Boone</i>	76,185	8.32%	20.56%	18.83%	29.85%	22.44%
<i>Buchanan</i>	38,696	1.89%	6.96%	9.19%	21.66%	60.30%
<i>Callaway</i>	18,865	3.92%	17.56%	23.78%	27.94%	26.80%
<i>Carroll</i>	4,642	2.24%	6.70%	8.29%	21.07%	61.70%
<i>Chariton</i>	4,158	1.83%	9.93%	9.24%	29.03%	49.98%
<i>Greene</i>	132,241	4.77%	15.85%	18.71%	29.73%	30.94%
<i>Jackson</i>	320,515	2.25%	9.06%	10.35%	26.10%	52.23%
<i>Jasper</i>	50,872	9.84%	14.48%	14.18%	22.42%	39.08%
<i>Jefferson</i>	90,489	3.74%	18.96%	18.68%	31.37%	27.25%
<i>Lafayette</i>	14,776	1.04%	13.58%	14.35%	28.81%	42.23%
<i>Lewis</i>	4,540	4.23%	15.70%	14.78%	27.69%	37.60%
<i>Lincoln</i>	21,569	5.22%	32.80%	19.54%	25.49%	16.95%
<i>Livingston</i>	6,795	2.80%	8.17%	9.89%	26.99%	52.16%
<i>McDonald</i>	9,956	4.21%	18.69%	17.51%	30.67%	28.92%
<i>Miller</i>	12,903	2.99%	14.16%	18.59%	35.40%	28.85%
<i>Newton</i>	24,687	4.34%	15.49%	18.54%	29.74%	31.89%
<i>Osage</i>	6,622	4.26%	15.43%	12.62%	30.29%	37.39%
<i>Pike</i>	7,911	2.59%	14.75%	13.80%	24.55%	44.31%
<i>Platte</i>	41,301	5.51%	20.02%	19.93%	34.29%	20.24%
<i>Pulaski</i>	19,058	13.27%	25.17%	16.56%	24.35%	20.65%
<i>Saline</i>	10,161	2.27%	8.03%	8.33%	28.78%	52.59%

<sup>51</sup> American Community Survey Selected Housing Characteristics, ACS 2014-2018, Table DP04 - [https://data.census.gov/cedsci/table?id=ACS%205-Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US29.050000&hidePreview=false&vintage=2018&layer=VT\\_2018\\_050\\_00\\_PY\\_D1&cid=DP04\\_0001E&t=Housing](https://data.census.gov/cedsci/table?id=ACS%205-Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US29.050000&hidePreview=false&vintage=2018&layer=VT_2018_050_00_PY_D1&cid=DP04_0001E&t=Housing)



### 12.1.2. Rental Housing

Rental housing is an important component of affordable housing in the impacted areas. Much of the rental housing (approximately 83%) in Missouri was built prior to 1999.<sup>52</sup> The older building codes and, in some cases, the lack of regular maintenance may add to the vacancy rate and therefore the rental housing needs.

The rental vacancy rate for Missouri was 6.6% according to the Census, American Community Survey (2014-2018).<sup>53</sup> In Cole County, the rental vacancy rate is 12.4%, based on the ACS data for the same period, nearly than double the statewide rate. The median monthly rent for the state is \$830. Rents are lower in Cole County at \$628 per month and higher in St. Charles County at \$1,018 per month. Notably, however, statewide, a rather large number of renters pay (277,789, or about 38% of all renters) more than 35% of their income to rent, whereas the median mortgage is about \$1,249 and the vast majority of homeowners pay less than 20% of their monthly income to a mortgage. In Cole County, about 28% of renters pay more than 30% of their monthly income to rent, compared to about 31% of renters in St. Charles County. Some 154,981 people pay more than 30% of their monthly income to a mortgage throughout the state. ACS data for these variables and indicators is not available for Holt County. Of the FEMA applicants to the IA program for the state-assessed area, more than 733 live in rental housing; 514 of whom declared an income less than \$30,000.

As indicated by the maps below (Figures 39 - 41), rental units in Cole County are primarily single family and Multifamily units, with the majority of renters in those unit types as opposed to mobile homes or other housing types. This is due to the rural nature of the communities in Cole County. Both Holt and St. Charles counties are similar but have a moderate number of renters living in mobile homes.

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[https://data.census.gov/cedsci/table?q=Missouri&hidePreview=true&tid=ACSDP1Y2018.DP04&table=DP04&g=0400000US29\\_0500000US29051,29183&layer=VT\\_2018\\_050\\_00\\_PY\\_D1](https://data.census.gov/cedsci/table?q=Missouri&hidePreview=true&tid=ACSDP1Y2018.DP04&table=DP04&g=0400000US29_0500000US29051,29183&layer=VT_2018_050_00_PY_D1)

53

[https://data.census.gov/cedsci/table?q=Missouri&hidePreview=true&tid=ACSDP1Y2018.DP04&table=DP04&g=0400000US29\\_0500000US29051,29183&layer=VT\\_2018\\_050\\_00\\_PY\\_D1](https://data.census.gov/cedsci/table?q=Missouri&hidePreview=true&tid=ACSDP1Y2018.DP04&table=DP04&g=0400000US29_0500000US29051,29183&layer=VT_2018_050_00_PY_D1)

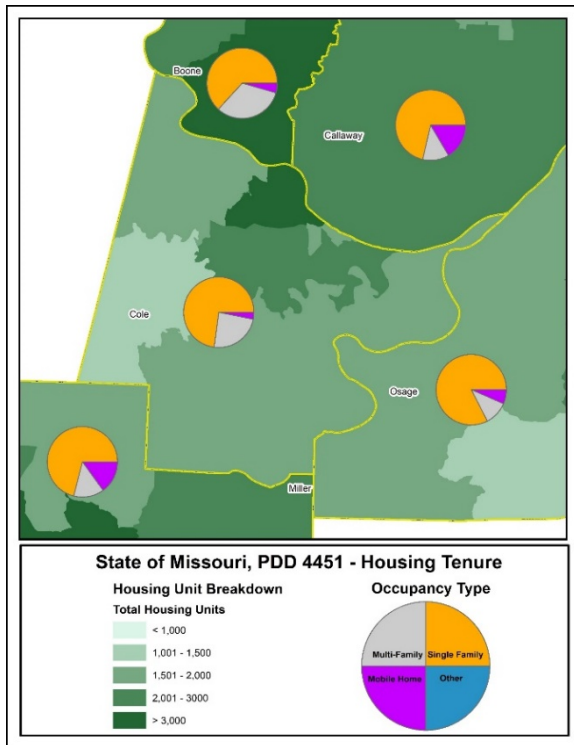


Figure 39. Rental housing unit breakdown – Cole County

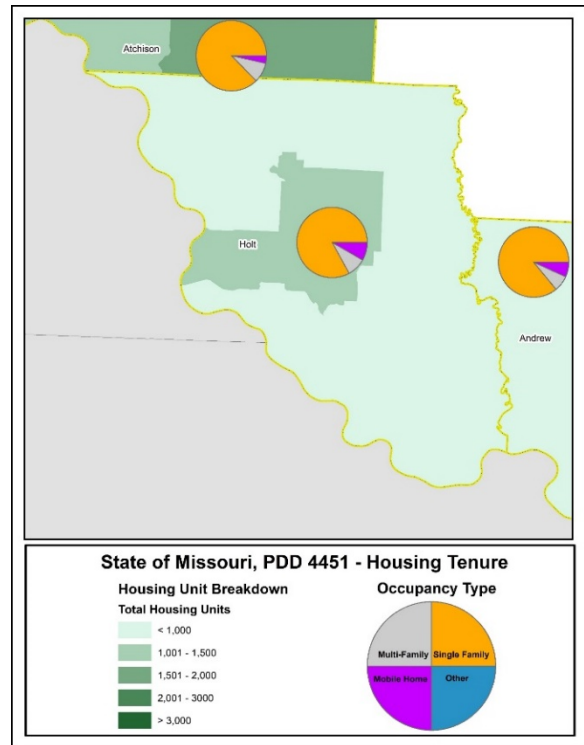


Figure 40. Rental housing unit breakdown – Holt County

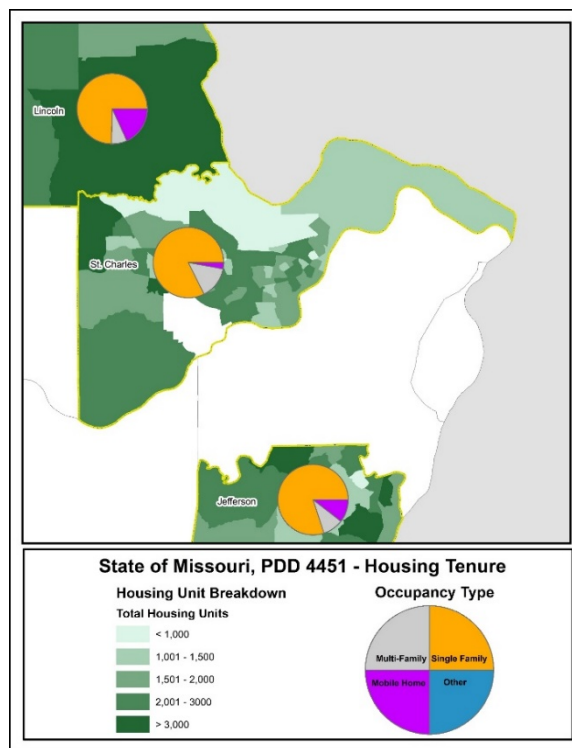


Figure 31. Rental housing unit breakdown – St. Charles County

### 12.1.3. Mobile Homes

Mobile homes (Figures 42 - 45) are part of the housing fabric of Missouri. Their affordability and ease of general maintenance provides housing independence and housing choice to residents across the state. However, tornadic damage can be catastrophic to mobile homes if unanchored or overwhelmed by stronger storms, and wind, rain, and flooding damage to mobile homes is often difficult to repair due to the integrated nature of the building components. In addition, when considering whether a structure is repairable or not, the cost of making those repairs may be disproportionately high when considering the overall value of the structure.

Often, the full extent of mobile home damage is not always realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home's structure or insulation can develop over time as well. Limited assistance funds distributed through fragmented assistance programs can lead to piecemeal repairs that add up in cost, without adequately addressing restoration of the home's structural integrity to a decent, safe, and sanitary standard. Of the FEMA IA applicants in the state-assessed areas, approximately 111 of them reside in mobile home units in the three most impacted counties of Cole, Holt, and St. Charles counties. Notably, in the northeast portions of St. Charles County, more than 41% of homes are mobile homes located closest to the Mississippi River—one of the highest concentrations of mobile homes in the state. Of the 111 mobile home applicants requesting assistance, 72 of these homes are in St. Charles County, with 9 renting mobile homes as their primary residence.

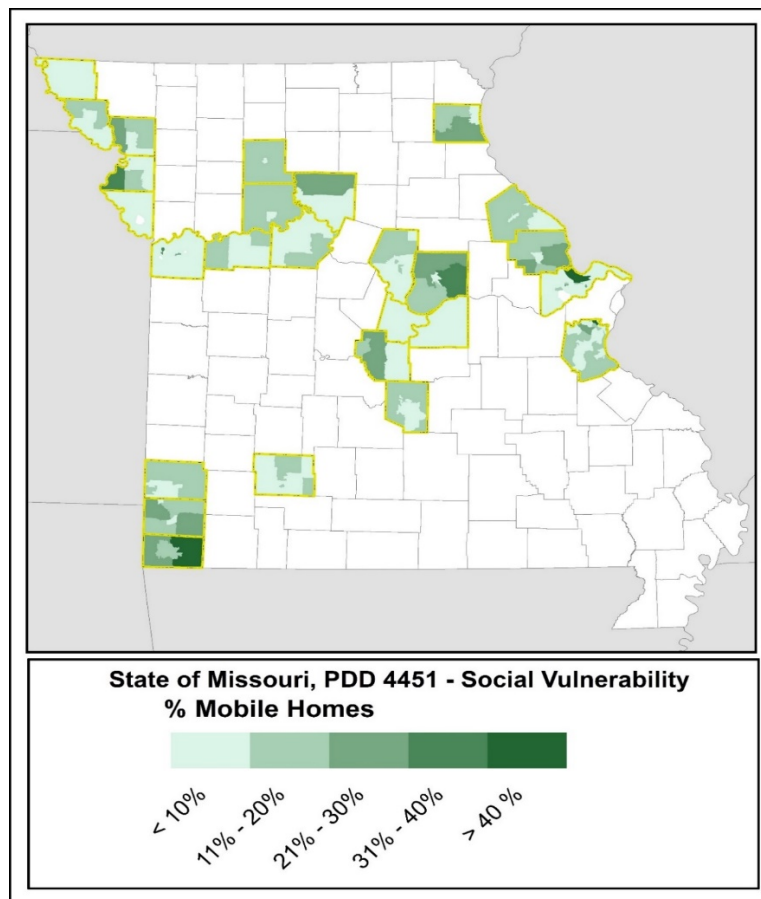


Figure 42. Mobile home percentages by census tract

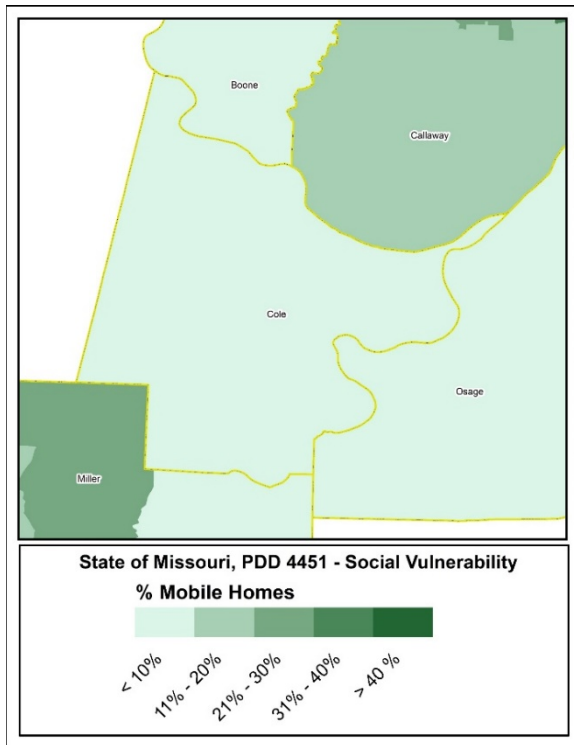


Figure 43. Mobile home percentages by census tract – Cole County

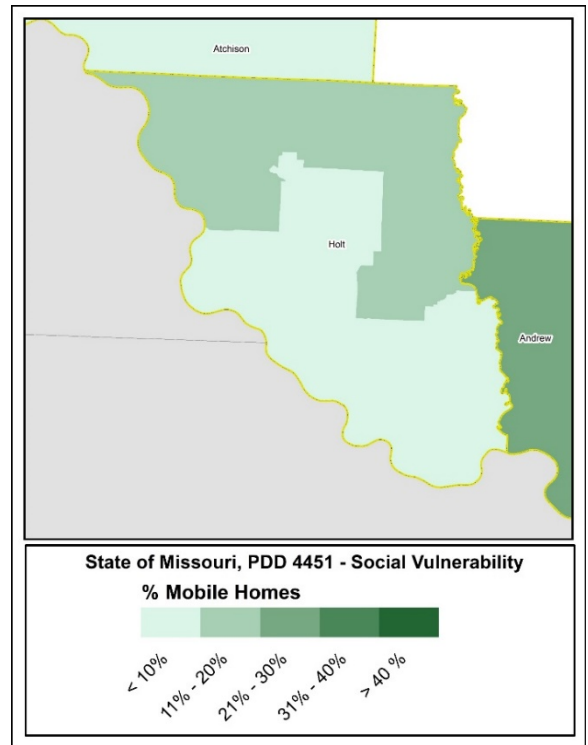


Figure 44. Mobile home percentages by census tract – Holt County

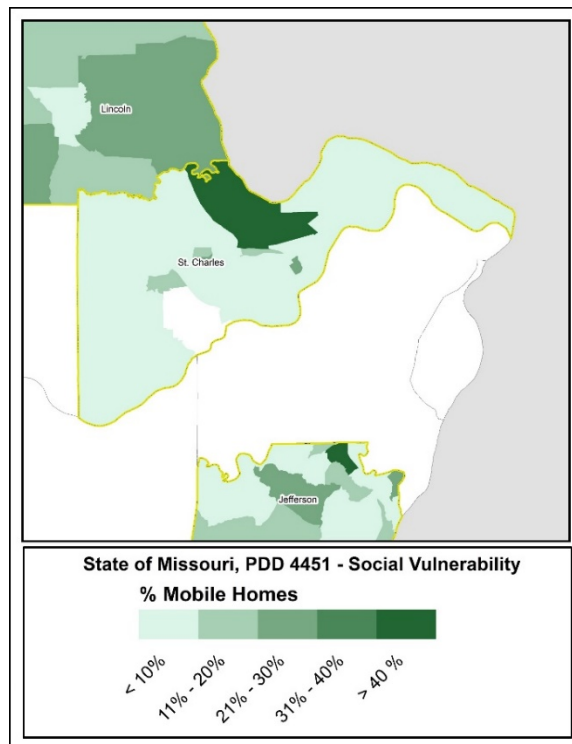


Figure 45. Mobile home percentages by census tract – St. Charles County

Mobile homes and damage to these vulnerable structures was also concentrated in rural, non-urban areas, as illustrated in the map above. Mobile homes damaged in Cole, Holt, and St. Charles Counties combine to account for nearly 45% of the total mobile homes damaged across the state. Across the state there were 162 mobile homes with a FEMA Real Property Verified Losses (Table 20).

Table 20. DR-4451, Mobile homes with FEMA Verified Losses

County	Owner	Renter	Grand Total
Andrew	9		9
Cole	16		16
Holt	9		9
Pike	6		6
Miller	7		7
Jackson	2		2
Callaway	3		3
St. Charles	46	1	47
Buchanan	9	1	10
Livingston	5		5
Jasper	9		9
Lincoln	8		8
Greene	2		2
Pulaski	9		9
Atchison	1		1
Lafayette	1		1
Newton	6		6
Lewis	1		1
Chariton	3		3
Boone	3		3
McDonald	3		3
Osage	2		2
<b>Grand Total</b>	<b>160</b>	<b>2</b>	<b>162</b>

When looking at the FEMA IA applicant population, many of the applicants either reside in high vulnerability zip codes, as defined by High social vulnerability scores, or Medium-High social vulnerability areas. Of these residents, there are subsets of populations over the age of 65, and additionally, who are over 65 and have access and functional needs (AFN). These applicants, and those who are low-income, often have the fewest means of assistance available to them. Table 21 - 26 provide breakouts of FEMA IA applicants into categories considering ownership versus rental, age, and access and functional needs.

Table 21: Applicant breakdowns by housing tenure and age

County	Owner	Renter	Unknown	Grand Total
<b>Andrew</b>	<b>129</b>	<b>13</b>	<b>5</b>	<b>147</b>
Under 65	88	9	3	100
Over 65	41	4	2	47
<b>Cole</b>	<b>221</b>	<b>254</b>	<b>8</b>	<b>483</b>
Under 65	156	245	6	407
Over 65	65	9	2	76
<b>Holt</b>	<b>214</b>	<b>69</b>	<b>6</b>	<b>289</b>

Under 65	130	43	4	177
Over 65	84	26	2	112
<b>Pike</b>	<b>71</b>	<b>20</b>		<b>91</b>
Under 65	43	18		61
Over 65	28	2		30
<b>Miller</b>	<b>82</b>	<b>74</b>		<b>156</b>
Under 65	56	56		112
Over 65	26	18		44
<b>Jefferson</b>	<b>17</b>	<b>4</b>		<b>21</b>
Under 65	13	3		16
Over 65	4	1		5
<b>Jackson</b>	<b>133</b>	<b>31</b>	<b>1</b>	<b>165</b>
Under 65	107	29	1	137
Over 65	26	2		28
<b>Callaway</b>	<b>19</b>	<b>3</b>	<b>2</b>	<b>24</b>
Under 65	12	3	1	16
Over 65	7		1	8
<b>St. Charles</b>	<b>456</b>	<b>92</b>	<b>7</b>	<b>555</b>
Under 65	331	85	7	423
Over 65	125	7		132
<b>Buchanan</b>	<b>92</b>	<b>21</b>	<b>1</b>	<b>114</b>
Under 65	60	18	1	79
Over 65	32	3		35
<b>Livingston</b>	<b>25</b>	<b>3</b>		<b>28</b>
Under 65	16	3		19
Over 65	9			9
<b>Jasper</b>	<b>149</b>	<b>8</b>	<b>1</b>	<b>158</b>
Under 65	101	7		108
Over 65	48	1	1	50
<b>Lincoln</b>	<b>116</b>	<b>43</b>	<b>6</b>	<b>165</b>
Under 65	89	42	3	134
Over 65	27	1	3	31
<b>Greene</b>	<b>70</b>	<b>5</b>		<b>75</b>
Under 65	42	5		47
Over 65	28			28
<b>Pulaski</b>	<b>20</b>			<b>20</b>
Under 65	12			12
Over 65	8			8
<b>Atchison</b>	<b>49</b>	<b>13</b>		<b>62</b>
Under 65	28	13		41
Over 65	21			21
<b>Lafayette</b>	<b>14</b>	<b>1</b>		<b>15</b>
Under 65	8			8

Over 65	6	1		7
<b>Newton</b>	<b>61</b>	<b>26</b>		<b>87</b>
Under 65	45	24		69
Over 65	16	2		18
<b>Lewis</b>	<b>16</b>	<b>1</b>		<b>17</b>
Under 65	14	1		15
Over 65	2			2
<b>Chariton</b>	<b>73</b>	<b>10</b>	<b>7</b>	<b>90</b>
Under 65	45	9	4	58
Over 65	28	1	3	32
<b>Boone</b>	<b>10</b>	<b>8</b>		<b>18</b>
Under 65	6	8		14
Over 65	4			4
<b>Platte</b>	<b>17</b>	<b>2</b>		<b>19</b>
Under 65	14	2		16
Over 65	3			3
<b>Carroll</b>	<b>65</b>	<b>19</b>	<b>4</b>	<b>88</b>
Under 65	45	18	2	65
Over 65	20	1	2	23
<b>McDonald</b>	<b>78</b>	<b>12</b>	<b>1</b>	<b>91</b>
Under 65	57	11		68
Over 65	21	1	1	23
<b>Osage</b>	<b>17</b>	<b>1</b>		<b>18</b>
Under 65	14	1		15
Over 65	3			3
<b>Saline</b>	<b>8</b>			<b>8</b>
Under 65	3			3
Over 65	5			5
<b>Grand Total</b>	<b>2,222</b>	<b>733</b>	<b>49</b>	<b>3,004</b>

Table 22: DR-4451 Applicant breakdowns by housing tenure and access and function needs

<i>County</i>	<b>Access and Functional Needs</b>		<b>Without Access and Functional Needs</b>	
	Owners	Renters	Owners	Renters
<i>Cole</i>	27	42	202	212
<i>Holt</i>	27	13	193	56
<i>St. Charles</i>	69	8	394	84
<i>Andrew</i>	16	2	118	11
<i>Atchison</i>	12	0	37	13
<i>Boone</i>	3	0	7	8

<b>County</b>	<b>Access and Functional Needs</b>		<b>Without Access and Functional Needs</b>	
	Owners	Renters	Owners	Renters
<i>Buchanan</i>	10	3	83	18
<i>Callaway</i>	4	0	17	3
<i>Carroll</i>	3	1	66	18
<i>Chariton</i>	12	2	68	8
<i>Greene</i>	12	1	58	4
<i>Jackson</i>	26	8	108	23
<i>Jasper</i>	9	0	141	8
<i>Jefferson</i>	0	1	17	3
<i>Lafayette</i>	4	0	10	1
<i>Lewis</i>	2	0	14	1
<i>Lincoln</i>	18	7	104	36
<i>Livingston</i>	2	0	23	3
<i>McDonald</i>	13	1	66	11
<i>Miller</i>	11	22	71	52
<i>Newton</i>	8	2	53	24
<i>Osage</i>	2	0	15	1
<i>Pike</i>	7	4	64	16
<i>Platte</i>	1	0	16	2
<i>Pulaski</i>	5	0	15	0
<i>Saline</i>	1	0	7	0
<i>Grand Total</i>	304	117	1,967	616

Table 23: DR-4451 Owner-Occupied Units by LMI and County

<b>County</b>	<b>Total Owners</b>	<b>Total Under 80% LMI</b>	<b>Percent of Total Owners Under 80% LMI</b>	<b>Number under 30% LMI</b>	<b>Number 30%-50% LMI</b>	<b>Number 50%-80% LMI</b>	<b>Number over 80% LMI</b>
<i>Cole</i>	229	139	60.70%	56	44	39	90
<i>Holt</i>	220	98	44.55%	44	27	27	122
<i>St. Charles</i>	463	318	68.68%	104	69	145	145
<i>Andrew</i>	134	63	47.01%	23	24	16	71
<i>Atchison</i>	49	24	48.98%	12	4	8	25
<i>Boone</i>	10	9	90.00%	5	4	0	1



<i>County</i>	<b>Total Owners</b>	<b>Total Under 80% LMI</b>	<b>Percent of Total Owners Under 80% LMI</b>	<b>Number under 30% LMI</b>	<b>Number 30%-50% LMI</b>	<b>Number 50%-80% LMI</b>	<b>Number over 80% LMI</b>
<i>Buchanan</i>	93	41	44.09%	14	20	7	52
<i>Callaway</i>	21	11	52.38%	3	7	1	10
<i>Carroll</i>	69	28	40.58%	13	4	11	41
<i>Chariton</i>	80	51	63.75%	30	5	16	29
<i>Greene</i>	70	22	31.43%	10	2	10	48
<i>Jackson</i>	134	51	38.06%	27	21	3	83
<i>Jasper</i>	150	41	27.33%	23	6	12	109
<i>Jefferson</i>	17	13	76.47%	4	4	5	4
<i>Lafayette</i>	14	10	71.43%	3	3	4	4
<i>Lewis</i>	16	9	56.25%	5	1	3	7
<i>Lincoln</i>	122	97	79.51%	33	29	35	25
<i>Livingston</i>	25	17	68.00%	10	0	7	8
<i>McDonald</i>	79	43	54.43%	28	0	15	36
<i>Miller</i>	82	44	53.66%	25	2	17	38
<i>Newton</i>	61	31	50.82%	15	6	10	30
<i>Osage</i>	17	10	58.82%	5	4	1	7
<i>Pike</i>	71	37	52.11%	23	6	8	34
<i>Platte</i>	17	10	58.82%	0	3	7	7
<i>Pulaski</i>	20	14	70.00%	5	5	4	6
<i>Saline</i>	8	1	12.50%	1	0	0	7
<b>Grand Total</b>	<b>2,271</b>	<b>1,232</b>	<b>54.25%</b>	<b>521</b>	<b>300</b>	<b>411</b>	<b>1,039</b>

Table 24: DR-4451 Renter-Occupied Units by LMI and County

<i>County</i>	<b>Total Renters</b>	<b>Total Under 80% LMI</b>	<b>Percent of Total Renters Under 80% LMI</b>	<b>Number under 30% LMI</b>	<b>Number 30%-50% LMI</b>	<b>Number 50%-80% LMI</b>	<b>Number above 80% LMI</b>
<i>Cole</i>	254	238	93.70%	124	79	35	16
<i>Holt</i>	69	54	78.26%	27	11	16	15
<i>St. Charles</i>	92	70	76.09%	25	19	26	22
<i>Andrew</i>	13	11	84.62%	4	5	2	2
<i>Atchison</i>	13	5	38.46%	1	2	2	8
<i>Boone</i>	8	7	87.50%	5	2		1

<b>County</b>	<b>Total Renters</b>	<b>Total Under 80% LMI</b>	<b>Percent of Total Renters Under 80% LMI</b>	<b>Number under 30% LMI</b>	<b>Number 30%-50% LMI</b>	<b>Number 50%-80% LMI</b>	<b>Number above 80% LMI</b>
<i>Buchanan</i>	21	16	76.19%	10	3	3	5
<i>Callaway</i>	3	1	33.33%	1			2
<i>Carroll</i>	19	11	57.89%	6	2	3	8
<i>Chariton</i>	10	8	80.00%	6	1	1	2
<i>Greene</i>	5	3	60.00%	1	1	1	2
<i>Jackson</i>	31	20	64.52%	17	2	1	11
<i>Jasper</i>	8	8	100.00%	4	3	1	
<i>Jefferson</i>	4	4	100.00%	2		2	
<i>Lafayette</i>	1	0	0.00%				1
<i>Lewis</i>	1	0	0.00%				1
<i>Lincoln</i>	43	41	95.35%	17	10	14	2
<i>Livingston</i>	3	2	66.67%	2			1
<i>McDonald</i>	12	8	66.67%		3	5	4
<i>Miller</i>	74	67	90.54%	39	4	24	7
<i>Newton</i>	26	23	88.46%	12	5	6	3
<i>Osage</i>	1	1	100.00%			1	
<i>Pike</i>	20	15	75.00%	10	4	1	5
<i>Platte</i>	2	2	100.00%			2	
<i>Pulaski</i>		0	0.00%				
<i>Saline</i>		0	0.00%				
<b>Grand Total</b>	<b>733</b>	<b>615</b>		<b>313</b>	<b>156</b>	<b>146</b>	<b>118</b>

Table 25: Owner Applicant breakdown by LMI, Age, and Access and Function Needs

		<b>Owner Occupied Household</b>	<b>Owner Occupies Household Below 80% LMI</b>	<b>Owner Occupied Household Below 80% LMI, over Age 65</b>
<i>County</i>	Owners	Below 80% LMI	Over Age 65	With Access and Functional Needs
<i>Andrew</i>	134	63	24	4
<i>Atchison</i>	49	24	12	6
<i>Boone</i>	10	9	3	1
<i>Buchanan</i>	93	41	13	2
<i>Callaway</i>	21	11	4	2
<i>Carroll</i>	69	28	9	1
<i>Chariton</i>	80	51	21	5
<i>Cole</i>	229	139	43	14

		<b>Owner Occupied Household</b>	<b>Owner Occupies Household Below 80% LMI</b>	<b>Owner Occupied Household Below 80% LMI, over Age 65</b>
<i>Greene</i>	70	22	6	1
<i>Holt</i>	220	98	38	9
<i>Jackson</i>	134	51	11	3
<i>Jasper</i>	150	41	15	3
<i>Jefferson</i>	17	13	4	
<i>Lafayette</i>	14	10	5	1
<i>Lewis</i>	16	9	1	
<i>Lincoln</i>	122	97	24	5
<i>Livingston</i>	25	17	7	1
<i>McDonald</i>	79	43	12	5
<i>Miller</i>	82	44	14	2
<i>Newton</i>	61	31	8	2
<i>Osage</i>	17	10	2	
<i>Pike</i>	71	37	13	4
<i>Platte</i>	17	10	3	
<i>Pulaski</i>	20	14	6	3
<i>Saline</i>	8	1	1	
<i>St. Charles</i>	463	318	103	26
<i>Grand Total</i>	2,271	1,232	402	100

Table 26: Renter Applicant breakdown by LMI, Age, and Access and Function Needs

		<b>Renter Household</b>	<b>Renter Household Below 80% LMI</b>	<b>Renter Household Below 80% LMI, over Age 65</b>
<i>County</i>	<b>Renters</b>	<b>Below 80% LMI</b>	<b>Over Age 65</b>	<b>With Access and Functional Needs</b>
<i>Andrew</i>	13	11	3	
<i>Atchison</i>	13	5		
<i>Boone</i>	8	7		
<i>Buchanan</i>	21	16	3	2
<i>Callaway</i>	3	1		
<i>Carroll</i>	19	11		
<i>Chariton</i>	10	8	1	1
<i>Cole</i>	254	238	9	3
<i>Greene</i>	5	3		

		Renter Household	Renter Household Below 80% LMI	Renter Household Below 80% LMI, over Age 65
<i>Holt</i>	69	54	21	7
<i>Jackson</i>	31	20	2	1
<i>Jasper</i>	8	8	1	
<i>Jefferson</i>	4	4	1	
<i>Lafayette</i>	1			
<i>Lewis</i>	1			
<i>Lincoln</i>	43	41	1	
<i>Livingston</i>	3	2		
<i>McDonald</i>	12	8	1	1
<i>Miller</i>	74	67	17	4
<i>Newton</i>	26	23	1	
<i>Osage</i>	1	1		
<i>Pike</i>	20	15	1	1
<i>Platte</i>	2	2		
<i>St. Charles</i>	92	70	5	2
<i>Grand Total</i>	733	615	67	22

## 12.2 Public Housing

Public Housing is an integral piece of the State's housing resources for low-income persons. Statewide, there are approximately 32 section 8 participants who were in some way impacted by the severe storms. Fortunately, all these units were repaired in June/July 2019 and all residents were invited to re-inhabit units. Public Housing Authorities (PHAs) located in the MIDs are eligible sub-recipients, may opt to collaborate with MID lead UGLG to submit a proposal addressing any rehabilitation, mitigation, and new construction needs for disaster-impacted PHAs in order to meet the unmet needs of damage public housing units. Such proposals should include and identify necessary and reasonable costs, ensure adequate funding from all available sources (including CDBG-DR grant funds) are dedicated to addressing the unmet needs of damaged public housing.

### 12.2.1 Fair Housing

The State, including multiple stakeholders such as the Missouri Certified Sites Program, the Missouri Economic Development Council, and the Missouri Housing Development Commission, has conducted Fair Housing Surveys on a regular and ongoing basis, and has also undertaken public awareness activities, such as fair housing fairs and roundtable discussions. The State's fair housing efforts related to HUD funding have been detailed each year in the State's Consolidated Annual Performance and Evaluation Report, as required by HUD.

The State of Missouri has created this Unmet Needs Assessment and Action Plan to address a general program design that targets assistance funding to citizens with the most recovery needs as determined by geographic concentration of damage, financial impact, and social vulnerability indicators. These criteria cover a broad spectrum of characteristics, none of which will be considered in isolation. The

State will remain highly agile throughout the planning and implementation process to ensure program design is consistent with need as identified through public engagement.

Missouri has conducted comprehensive resilience planning that considers regional drivers of short-and long-term resilience and fair housing practices to the smallest possible geographic level. The State supports resilience planning methods that incorporate data analyzed via social vulnerability as well as public involvement and social justice processes. Resilience planning should incorporate measures to strategically align resources in a way that emboldens drivers of resilience, especially those that provide protection for the most vulnerable, consistent with HUD’s direction to Affirmatively Further Fair Housing.

### 13. Housing Funds Made Available

The main federal funding sources that are available for impacted residents in the immediate aftermath of a disaster are FEMA Individual Assistance, low-interest loans from the U.S. Small Business Association (SBA), and insurance proceeds from the National Flood Insurance Program (NFIP). These three funding streams account for a majority of all housing recovery funds made available before CDBG-DR.

Of the twenty-six counties declared eligible to receive Individual Assistance funding through FEMA in Missouri’s DR-4451 area of interest, there were 3,004 Applicants.

Of these, 1,391 had a FEMA Property Loss (FVL) assessment; however, this does not mean that the applicant received funding. Of the applicants with an FVL, 959 received housing assistance (HA). An estimated \$12,348,433 in damage was assessed for the applicants with an FVL. Funds to recover from those with real property losses coupled with housing assistance for applicants with no FVL has resulted in \$6,119,524 in housing assistance to date (Table 27).

Table 27: DR-4451 Applicants by FEMA Verified Losses and FEMA Housing Assistance Support

Impacted Counties	FEMA IA Applicants	Percentage of Applicants	Amount of Real Property Loss (Housing Assistance)	Average Real Property Loss (Housing Assistance)
<i>Universe (All Counties)</i>	3,004			
<i>Had FEMA Real Property Loss</i>	1,391	46.30%	\$12,348,433	\$4,111
<i>    Received HA</i>	959	31.92%	(\$5,584,150)	\$5,823
<i>    Received No HA</i>	432	14.38%	\$0	\$0
<i>No FEMA Real Property Loss</i>	1,613	53.70%		
<i>    Received HA</i>	332	11.05%	(\$535,373)	\$1,613
<i>    Received No HA</i>	1,281	42.64%	\$0	\$0

#### 13.1 FEMA Individual Assistance (IA)

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds are for bridging the gap from sheltering to the return to permanent housing. These funds can be used for limited basic home repairs and replacement of essential household items as well as rental payments for temporary housing. Importantly, FEMA IA is limited to bring a home back to a basic level of “safe and sanitary living or functioning condition,” and does not account for the full extent of the home’s damage or need. By mandate, FEMA only accounts for

losses to essential living areas – those areas used by residents of a home, but does not count damages in extra bedrooms, bathrooms, or unoccupied basements, among other areas.<sup>54</sup>

### 13.2 National Flood Insurance Program (NFIP) Coverage

Unfortunately, like many other places in the Mid-West, Missouri residents tend to be under-insured in terms of flood coverage. In fact, as of 2017, Missouri had only 21,503 NFIP policies (Figure 46)<sup>55</sup> - an extremely low rate of 0.7% of all housing units (2,806,371) in the State. This low level of insurance uptake can be the result of properties being “heirship” (deeded down from parents or grandparents) or lien-free because the home no longer has a mortgage associated with it. Without a bank note, an owner may not be aware of the home’s location in the floodplain, or they may choose to forego flood insurance since it is not mandated.

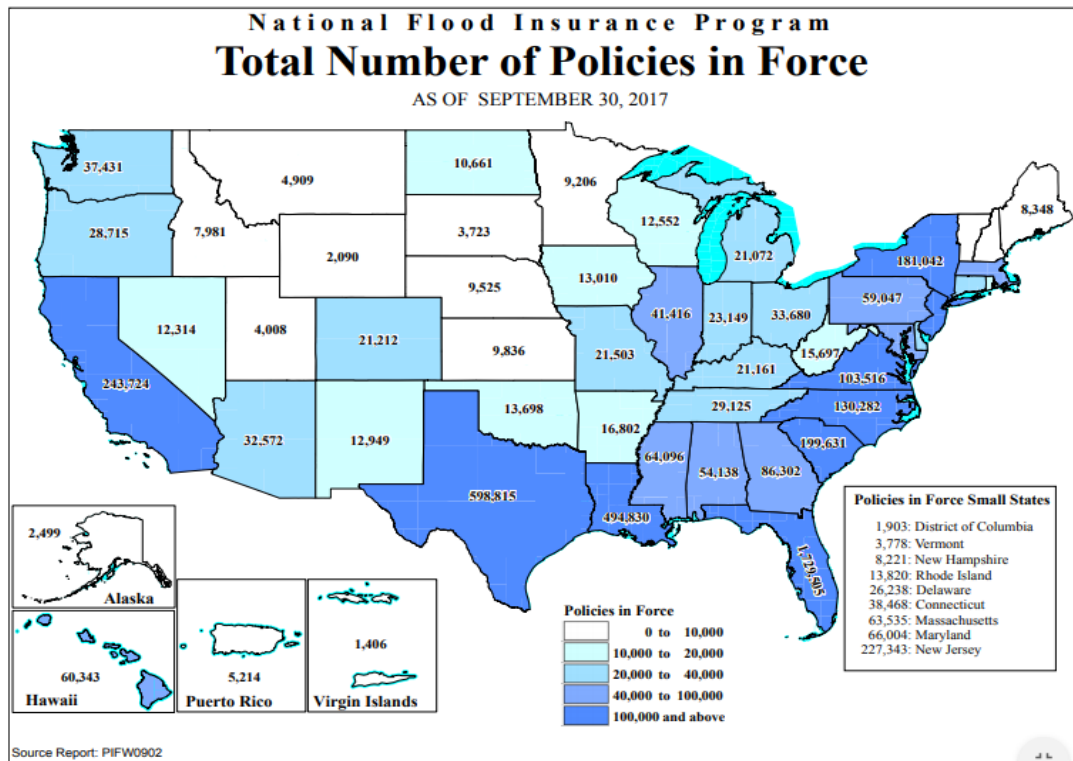


Figure 46. National Flood Insurance Policies by year for the United States

Paid flood insurance claims were not a significant source of recovery funds for Missouri following this disaster event. According to FEMA Open NFIP redacted Claims data<sup>56</sup> only \$983,189 was distributed across the DR-4451 impact area (Table 28). Furthermore, while nearly 1,000 flood claims were made between April 29 – July 5, 2019, only 118 have been closed and marked as paid as of this report’s creation, an overall rate of just under 12%.

Table 28. DR-4451, NFIP Flood Claim Payout Summary by County

<sup>54</sup> <https://www.fema.gov/news-release/2012/12/18/fema-housing-assistance-based-damage-essential-living-areas>

<sup>55</sup> [https://www.fema.gov/media-library-data/1545238473991-81a51f3e5c4cbfbd44e86a3548804227/Total\\_PIF\\_fy2017.pdf](https://www.fema.gov/media-library-data/1545238473991-81a51f3e5c4cbfbd44e86a3548804227/Total_PIF_fy2017.pdf)

<sup>56</sup> <https://www.fema.gov/media-library/assets/documents/180374>

<b>County</b>	<b>All Flood Claims</b>	<b>Paid Flood Claims</b>	<b>Claim payout percentage</b>	<b>Total Building Payments</b>
<i>Cole</i>	23	3	13.04%	\$5,383
<i>Holt</i>	36	0	0.00%	\$0
<i>St. Charles</i>	401	58	14.46%	\$464,048
<i>Andrew</i>	15	5	33.33%	\$50,754
<i>Atchison</i>	1	0	0.00%	\$0
<i>Boone</i>	3	0	0.00%	\$0
<i>Buchanan</i>	43	1	2.33%	\$6,354
<i>Callaway</i>	17	0	0.00%	\$0
<i>Carroll</i>	20	1	5.00%	\$1,666
<i>Chariton</i>	17	0	0.00%	\$0
<i>Greene</i>	1	0	0.00%	\$0
<i>Jackson</i>	19	5	26.32%	\$70,504
<i>Jasper</i>	20	3	15.00%	\$20,379
<i>Jefferson</i>	30	3	10.00%	\$25,866
<i>Lafayette</i>	0	0	-	\$0
<i>Lewis</i>	34	2	5.88%	\$5,928
<i>Lincoln</i>	134	16	11.94%	\$146,070
<i>Livingston</i>	2	0	0.00%	\$0
<i>McDonald</i>	54	7	12.96%	\$102,937
<i>Miller</i>	1	1	100.00%	\$5,739
<i>Newton</i>	29	4	13.79%	\$46,458
<i>Osage</i>	6	0	0.00%	\$0
<i>Pike</i>	68	8	11.76%	\$26,608
<i>Platte</i>	9	1	11.11%	\$4,494
<i>Pulaski</i>	1	0	0.00%	\$0
<i>Saline</i>	1	0	0.00%	\$0
<b>Grand Total</b>	<b>985</b>	<b>118</b>	<b>11.98%</b>	<b>\$983,189</b>

### 13.3 Small Business Administration (SBA) Home Loans

The SBA has made \$8,468,600 in assistance available to 221 homeowner applicants in the DR-4451 impact area for residential repairs, rebuilding, or relocations (Table 29). The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this disaster event was \$38,319. It is important to note that the average SBA loan is more than 8 times more than the average FEMA HA payment of \$4,740. This important difference will be discussed more in the section.

Table 29. SBA Home Loan Summary

<b>SBA Rebuild/Repair Loan Type</b>	<b>Number of Loans</b>	<b>Total Loan</b>	<b>Average Loan</b>
<i>Repair</i>	195	5,832,700	\$29,911
<i>Relocation</i>	5	436,700	\$87,340
<i>Reconstruction</i>	21	2,199,200	\$104,724
<i>Across All Programs</i>	221	8,468,600	\$38,319

## 14. Housing Unmet Need

Approximately 1,713 FEMA Individual Assistance applicants (57%) in the State-assessed area have not been deemed eligible to receive housing assistance to date. There are a variety of reasons why an applicant may be deemed ineligible for assistance. According to FEMA, a few of these reasons are:

- *“Sometimes a first ineligibility determination is simply a clerical error, such as a name is misspelled, an address does not match, or a signature has been left out.*
- *If more than one person from the same home address registered, the applications will be flagged until the head of household can be determined.*
- *The applicant has insurance, and more information about the policy is needed. FEMA cannot duplicate benefits. However, once you receive insurance payment, FEMA may be able to assist with uninsured losses.*
- *Proof of occupancy is required. Whether a homeowner or renter, the damaged dwelling must be a primary residence where the applicant lived at the time of the disaster.*
- *Identity verification is needed. Sometimes an applicant simply needs to submit documentation—such as a passport or military issued ID—so a social security number can be verified. If an applicant was recently married, a marriage certificate or license may be required to verify any name change.”<sup>57</sup>*

Importantly, however, an applicant may be determined to be ineligible because a FEMA damage inspector attributes damage claimed by the applicant as flood/storm-related to have been caused by pre-disaster conditions, or deferred maintenance. In other words, the inspector may determine that rain damage to the ceiling was due to the applicant having a poorly maintained roof in place before the storm, and not because the storm itself caused the damage. While there are likely many cases where an applicant is unable to identify uniquely storm-related damage to their home, in many cases, the older homes that lower-income and vulnerable applicants may live in can complicate the rapid inspections conducted by FEMA field officers.

The insurance-defined differences between flood damage and water damage are technical in nature and can be misunderstood by residents and damage inspectors alike. Damage from a flood occurs when water rises on land that is usually dry. However, water damage occurs when the water strikes the home prior to making contact with the ground. In many cases, a resident may not have the protection of flood insurance if they rent, live in a home with no mortgage, and/or live in a moderate-to-low -risk flood hazard area.<sup>58</sup> Many homeowners as well as renters may not realize that flood damage is not covered by a standard homeowner/rental insurance policy. Damage inspectors, expecting to see flood damage, may overlook water damage caused by rain. These complications can result in hardship and frustration after a disaster if residents are unable to receive assistance to repair their damaged home.

This issue has been brought to light in previous disasters. In Texas, fair housing advocates note:

*“Following Hurricane Ike, FEMA denied at least 85% of the more than 578,000 applications for housing assistance. The most common denial code used by FEMA (in over 100,000 cases) was “insufficient damage.” Many low-income applicants were told*

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<sup>57</sup> <http://www.fema.gov/news-release/2013/05/21/ineligible-fema-may-just-need-more-information>

<sup>58</sup> Fast Home Help: <http://www.fasthomehelp.com/blog/2013/03/26/flood-damage-versus-water-damage-123804>



informally by FEMA that their “insufficient damage” denials were actually based on “deferred maintenance.” FEMA alleged that the homes had been in poor condition before the storm and therefore damage could not be attributed to the hurricane. Because low-income households are more likely to have “deferred maintenance,” these denials had a disproportionate impact on low-income households, particularly in minority neighborhoods. Non-profit groups in Houston reported that entire neighborhoods, generally low income and minority concentrated, of damaged homes were deemed to have “insufficient damage.” FEMA similarly denied half of all applications for housing assistance following Hurricane Dolly. Based on a suit by Texas homeowners, a Federal District Court held that FEMA could not rely on this unpublished rule.”<sup>59</sup>

The chart below shows the percent of people who applied to FEMA IA who have received an award, by county, as well as the number of applicants receiving funds. On average, the award rate is approximately 43.4% for the impacted counties. This number will continue to fluctuate as applicants move through the review pipeline, but it will not go up or down significantly from this low level of support (Figure 47).

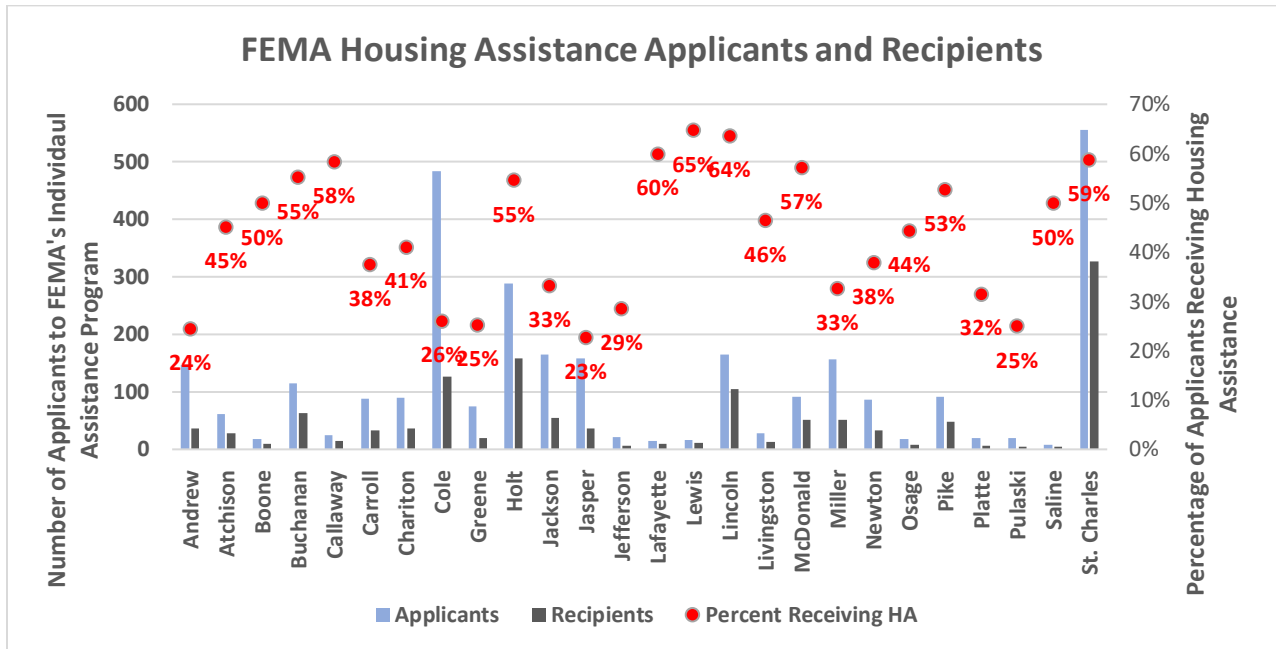


Figure 47. FEMA HA Funds Allocations by County

For this event, like many other Presidentially Declared disaster events, most *ineligible* FEMA IA applicants are living at or below federal poverty standards. This fact is noticeably clear in both Cole and St. Charles where 74% and 70% of FEMA IA ineligible applicants have incomes < 80% AMI (Area Median Income) respectively (Table 30). Although lower than the other two MID counties, Holt’s LMI ineligible survivors (42%) represent a population with large amounts of potential unmet need. Figure 48 graphically depicts this breakdown where we can see that most ineligible applicants have household incomes below 80% of the AMI.

<sup>59</sup> Written Testimony of Texas Appleeed for the Texas Senate Committee on Intergovernmental Relations Wednesday, December 2, 2015. [https://www.texasappleseed.org/sites/default/files/12-2-15%20Testimony%20of%20Texas%20Appleseed%20-%20IGR%20Charge%203\\_0.pdf](https://www.texasappleseed.org/sites/default/files/12-2-15%20Testimony%20of%20Texas%20Appleseed%20-%20IGR%20Charge%203_0.pdf)

Table 30. Ineligible applicants by AMI category and county

<b>County</b>	<b>AMI 30% or less</b>	<b>AMI 31-50%</b>	<b>AMI 51-80%</b>	<b>Percentage Below 80% AMI</b>	<b>Above 80 % AMI</b>	<b>Grand Total</b>
<i>Cole</i>	122	80	62	73.95%	93	357
<i>Holt</i>	29	15	13	43.51%	74	131
<i>St. Charles</i>	56	36	68	69.87%	69	229
<i>Andrew</i>	20	18	11	44.14%	62	111
<i>Atchison</i>	9	4	5	52.94%	16	34
<i>Boone</i>	5	3		88.89%	1	9
<i>Buchanan</i>	13	12	4	56.86%	22	51
<i>Callaway</i>	1	4		50.00%	5	10
<i>Carroll</i>	13	3	9	45.45%	30	55
<i>Chariton</i>	21	3	7	58.49%	22	53
<i>Greene</i>	9	2	5	28.57%	40	56
<i>Jackson</i>	31	19	1	46.36%	59	110
<i>Jasper</i>	17	7	8	26.23%	90	122
<i>Jefferson</i>	4	4	4	80.00%	3	15
<i>Lafayette</i>	2	1	1	66.67%	2	6
<i>Lewis</i>	2		2	66.67%	2	6
<i>Lincoln</i>	24	14	11	81.67%	11	60
<i>Livingston</i>	8		3	73.33%	4	15
<i>McDonald</i>	12	1	10	58.97%	16	39
<i>Miller</i>	37	4	30	67.62%	34	105
<i>Newton</i>	17	6	9	59.26%	22	54
<i>Osage</i>	3	2	2	70.00%	3	10
<i>Pike</i>	18	1	5	55.81%	19	43
<i>Platte</i>		1	9	76.92%	3	13
<i>Pulaski</i>	3	4	4	73.33%	4	15
<i>Saline</i>				0.00%	4	4
<b>Grand Total</b>	<b>476</b>	<b>244</b>	<b>283</b>	<b>58.55%</b>	<b>710</b>	<b>1,713</b>

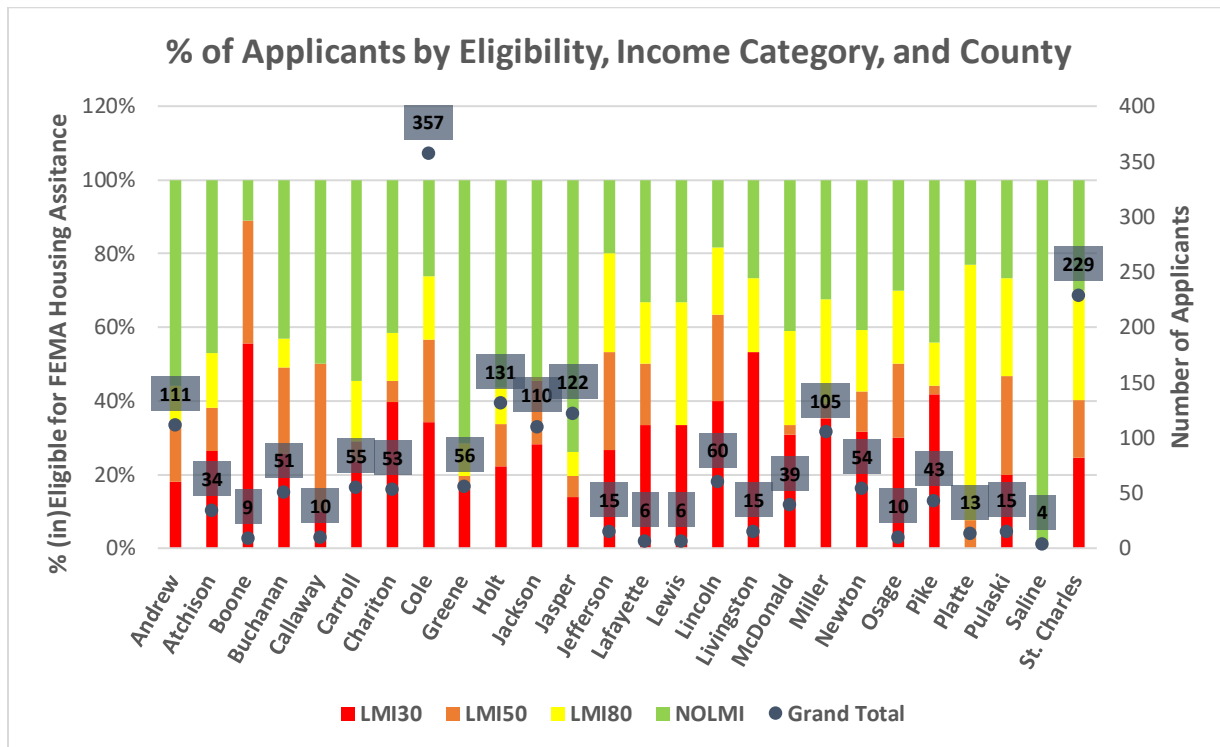


Figure 48. Applicant Summary by Eligibility, Income Category, and County

This significant skew in ineligibility identifies a need to focus on the large population of vulnerable individuals that may need focused outreach and intake assistance to review their eligibility for the CDBG-DR program, especially in areas where FEMA IA assistance was applied for but not provided.

### 14.1 Housing Impact Methodology

Utilizing best available data, the current unmet need for housing in Missouri following the severe storms and flooding of 2019 has been calculated by accounting for losses from multiple datasets, including FEMA’s IHP applicant data and SBA’s home loan data. It must be noted that the IHP is not intended to return disaster-damaged property to its pre-disaster condition. Rather, IHP is supplemental to other recovery resources. Furthermore, the Housing Assistance (HA) Program within IHP potentially undercounts total damage by design. FEMA’s housing program accounts for losses only to “essential rooms”<sup>60</sup> within a structure. Specifically, FEMA can only provide rent or repair money when there is damage to the living room, dining room, kitchen, bathroom and bedrooms used by occupants of the home, meaning that a home’s basement, unused bedrooms, bathrooms, or living areas are not counted in FEMA damage estimates and cannot be repaired using FEMA funds. However, although FEMA data does not provide a complete view of impacts and recovery it often provides the most comprehensive view of impacts. In short, FEMA IHP data has the largest breadth, but does not have comprehensive depth in loss or recovery information.

FEMA’s Individuals and Households Program provides repair and replacement assistance aimed at making a home “habitable” whereas SBA awards loan funding for the full cost to restore a home. This difference between programs is important because it highlights a need to move beyond FEMA’s initial and large-scale assessment and include specifics on housing losses only available from SBA.

<sup>60</sup> <https://www.fema.gov/news-release/2012/12/18/fema-housing-assistance-based-damage-essential-living-areas>

HUD calculates “unmet housing needs” as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. However, because complete data sources are often difficult to obtain after a major disaster event, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home. Recent unmet needs assessments have used “the average real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable.”<sup>61,62</sup>

Multiple recently approved impact assessment methodologies have utilized the SBA estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance (NFIP) data in combination with each other to triangulate the real need as opposed to relying only on FEMA verified losses alone.<sup>63</sup> Historically, SBA verified disaster-damaged property through on-site inspections by construction analysts who estimated the cost to restore property to its pre-disaster condition; however, since 2017, SBA has used a desktop loss verification process to improve processing times for disaster loan applications.<sup>64</sup> The desktop loss verification process uses an initial loss verification followed by a post desktop review, wherein total damage estimates use a FEMA on-site inspection report for loans under \$25,000; for loans greater than \$25,000, SBA deploys loss verifiers for site inspections to confirm property loss estimates and to capture a more comprehensive cost of repair/replacement in comparison to FEMA’s focus essential living areas.<sup>65</sup> Thus, SBA damage estimates provide a more comprehensive look at recovery than simply looking at FEMA inspected damage. Also, this assessment further accounts for under-representation of impacted populations stemming from FEMA ineligible applicants provides a more accurate accounting of overall housing impact across a study area.

Specifically, for Missouri, FEMA real property loss estimates are significantly lower than SBA property loss estimates across the DR-4451 impact area. The average FEMA real property loss for these storms (Table 31) was \$8,877 based on 1,391 applicants with FEMA verified losses. SBA average verified losses per household were valued at \$60,734 based on 358 applicants and represent a 6.8 times higher verified loss amount than FEMA. SBA median loss value of \$43,011 is 13.5 times higher than FEMA’s value of \$3,173. SBA’s average verified personal property losses of \$20,579 per applicant are 8.26 times higher than FEMA’s Personal Property Losses (PPFVL) of \$2,490 per applicant.

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<sup>61</sup> Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013

<sup>62</sup> <https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf>

<sup>63</sup> [http://www.cdbg-dr.pr.gov/wp-content/uploads/ponencias/Puerto Rico Action Plan Public for Comment.pdf](http://www.cdbg-dr.pr.gov/wp-content/uploads/ponencias/Puerto_Rico_Action_Plan_Public_for_Comment.pdf), <http://www.floridajobs.org/docs/default-source/2015-community-development/community-revitalization/dr/hcpafloridaactionplanhudapproved.pdf?sfvrsn=2>, <http://www.floridajobs.org/docs/default-source/community-development-files/2018-state-of-florida-cdbg-dr-action-plan-draft.pdf?sfvrsn=2>, <https://www.scdr.sc.gov/wp-content/uploads/2017/12/SC-Severe-Storm-Amendment-4-1-1-18-.pdf>, <https://www.scdr.sc.gov/wp-content/uploads/2017/12/SC-Hurricane-Matthew-Action-Plan-Amendment-2.pdf>

<sup>64</sup> <https://www.sba.gov/sites/default/files/oig/SBA-OIG-Report-19-23.pdf>

<sup>65</sup> <https://www.fema.gov/news-release/2012/12/18/fema-housing-assistance-based-damage-essential-living-areas>

Table 31: FEMA and SBA Damage Estimates

Program	Property Loss (FEMA) (FEMA – Real Property Verified Loss; SBA – Verified Real Estate Damage)				Personal Property Loss (FEMA - Other Needs Assistance; SBA – Verified Contents Damage)			
	Count	Total	Average	Median	Count	Total	Average	Median
FEMA Individual Assistance	1,391	\$12,348,433	\$8,877	\$3,173	931	\$2,317,911	\$2,490	1,773
SBA Disaster Home Loan Program	358	\$21,742,679	\$60,734	\$43,011	329	\$6,770,569	\$20,579	\$14,051

Several considerations are factored in to arrive at a more comprehensive picture for this estimated unmet need. First, applying the average SBA verified loss amount (\$60,734) of all SBA applicants with real property losses (358) to those who were disqualified or turned down for SBA loan assistance and those for whom a FEMA loss was established would push the full extent of housing impact caused by this disaster to nearly \$2 Million (before accounting for an increase in rebuilding for resilience or deductions for funds already provided). Utilizing the median SBA real property damage amount of \$43,011 accounts for outliers in the SBA data (a few very high and very low damage amounts) driving the average SBA loss up. Applying the median SBA property loss amount of \$43,011 to the total number of SBA applicants who did not have a verified loss estimated, in conjunction with DR4451 specific rebuilding cost, outlined in federal register language,<sup>66</sup> provides a more complete estimate of unmet housing needs for those without a determined real property loss, provides a more conservative and realistic view of losses to residential property across the impact area. Utilizing the unmet needs values from HUD discussed below, and FEMA data about the number of applicants (more than 3,000) results in an unadjusted housing impact of \$73,258,657. Methods for creating housing impacts and unmet needs are discussed below.

Housing impacts for this unmet needs assessment were calculated using SBA data in conjunction with FEMA applicant information. We begin (Table 34) by utilizing the known real property (repair) losses from SBA for the 358 applicants for which this value is determined (A). Included here are also an estimate (B) of losses for those SBA applicants without an SBA real estate verified loss. Combined these SBA derived losses are more than \$37.3 million (C).

Table 32. SBA Verified Losses

Id	Line Item	Count	Value
A	SBA applicants with a real estate verified loss	358	\$21,742,679
B	SBA applicants without a real estate verified Loss (Estimate)	364	\$15,655,982
C	Total verified loss of SBA Applicants (Estimate)	722	\$37,398,661

<sup>66</sup><https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf>

A more nuanced approach is required to account for FEMA non-renter (owner or “not specified”) applicants who are not represented by SBA data alone. Here, “not specified” non-renter populations are those who have neither indicated ownership nor renter status when applying for FEMA Individual Assistance support. First, all FEMA applicant real property losses were categorized based on HUD’s definitions of damage levels (Minor-Low to Severe) shown in Table 33. Utilizing loss value cutoffs and rebuild cost estimates provided in the federal register can provide a clearer understanding of losses across the Presidentially declared individual assistance counties.<sup>67</sup>

Table 33: HUD defined damage categories based on real property losses

Damage Category	Associated Real Property Losses
<i>Minor-Low</i>	Less than \$3,000 of FEMA inspected real property damage.
<i>Minor-High</i>	\$3,000 to \$7,999 of FEMA inspected real property damage.
<i>Major-Low</i>	\$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
<i>Major-High</i>	\$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
<i>Severe</i>	Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

Table 34 shows the breakdown of estimated losses to those not accounted for in SBA’s loan dataset. Rows (A – E) represent owner losses by HUD classified Minor-Low to Severe damage level categories for those owner applicants with FEMA personal property verified losses but without FEMA real property verified losses. Here, FEMA real property verified losses were classified into updated HUD designated unmet needs categories outlined in the federal register (Table 34).<sup>68</sup> HUD guidance outlines the process of determining repair costs by damage category as:

“The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster.”<sup>69</sup>

Following this guidance, total damage estimates for each federal register specified damage category were derived from SBA estimates of median home loan for rebuild/replace/relocate (Table 37). An

<sup>67</sup> [https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm\\_source=HUD+Exchange+Mailing+List&utm\\_campaign=01e5f52f10-EMAIL\\_CAMPAIGN\\_2020\\_01\\_17\\_10\\_30&utm\\_medium=email&utm\\_term=0\\_f32b935a5f-01e5f52f10-19420561](https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561)

<sup>68</sup> <https://www.gpo.gov/fdsys/pkg/FR-2018-08-14/pdf/2018-17365.pdf>

<sup>69</sup> [https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm\\_source=HUD+Exchange+Mailing+List&utm\\_campaign=01e5f52f10-EMAIL\\_CAMPAIGN\\_2020\\_01\\_17\\_10\\_30&utm\\_medium=email&utm\\_term=0\\_f32b935a5f-01e5f52f10-19420561](https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561), Page 35

estimate of additional potential un-met needs populations (I) was generated by subtracting the total SBA applicants (H) accounted for in SBA verified losses Table 34 from the sum of the total owner or “not-specified” applicants without a FEMA verified loss (F) and the number of SBA applicants without a FEMA registrant number (G). This potential unmet need applicant count (I) is then multiplied by the rebuild cost for minor-low damaged properties (\$1,775) (K) presuming that these victims only registered with FEMA because they sustained damage from the storm. Summing values for Lines A – I produces estimated losses for those applicants not represented by SBA (K). Estimated total losses of \$63.6 Million (L) to homeowners is derived by summing this value (K) with losses from SBA data alone and including additional costs associated with increased resilience of 30% (Table 36 Line E).

Table 34: Estimated Damage to Owner Applicant Dwellings

Id	Line Item	Count	Value
A	FEMA “owner” or “non-specified” applicants in HUD <i>Minor-Low</i> damage category	367	\$651,425
B	FEMA “owner” or “non-specified” applicants in HUD <i>Minor-High</i> damage category	96	\$817,344
C	FEMA “owner” or “non-specified” applicants in HUD <i>Major-Low</i> damage category	385	\$4,115,650
D	FEMA “owner” or “non-specified” applicants in HUD <i>Major-High</i> damage category	316	\$5,726,552
E	FEMA “owner” or “non-specified” applicants in HUD <i>Severe</i> damage category	245	\$14,625,520
F	Total owner or “not specified” applicants without a FEMA Verified Property Loss	862	
G	Number (count) of SBA Applicants without a FEMA Registrant ID	23	
H	Total SBA Housing Loan Applicants	722	
I	Potential additional unmet need population	163	289,325
J	Minor-Low Rebuilt Cost		\$1,775
K	Losses of FEMA applicants not represented by SBA data (Estimate)	1,712	\$26,225,816
L	Total verified loss of all homeowner applicants across FEMA and SBA (Estimate)		\$63,624,477

Table 35: HUD and estimated unmet needs based on real property derived damage category

Category of Real Property Damage	Count of Owner or “Other” Applicants with FEMA verified Real Property Losses	Count of Renter Applicants with FEMA verified Personal Property Losses	SBA Derived Repair Costs (HUD Method)
<i>Minor Low</i>	367	75	\$1,775
<i>Minor High</i>	96	31	\$8,514
<i>Major Low</i>	385	117	\$10,690
<i>Major High</i>	316	113	\$18,122
<i>Severe</i>	245	41	\$59,696
<i>No Damage Indicated</i>	862	356	\$19,759

A similar method as above was utilized to capture impacts to affected renter applicants (Table 36). Damage categories for renter occupied units were derived using a similar method applied only to personal property impacts (PPFVL) as documented in FEMA’s IHP dataset (Table 38). Impacts and support for personal property is used in the case of renter applicants because FEMA does not inspect rental units for real property damage.<sup>70</sup> Lines A-E represent a breakdown of renter losses by HUD classified Minor-Low to Severe damage levels for those applicants with documented PPFVL but without FEMA real property verified losses. Here, FEMA PPFVL values were classified into HUD designated categories based on federal registry classifications. Damage estimates were derived by multiplying counts of applicants (by damage category) by HUD provided estimates (Table 37). An estimate of potential unmet needs populations (H) was generated by subtracting a count of SBA applicants who received funds to support rental repair (landlords) (G) from the total FEMA renter applicants without personal property (contents) loss (F). This potential unmet need applicant count is then multiplied by the minor-low repair value (I) and summed with values (A-E) to create an estimated loss for all home renter applicants (J).

Table 36: Renter-Occupied Personal Property Damage Categories and Values

Damage Category	Associated Real Property Losses
<i>Minor-Low</i>	Less than \$1,000 of FEMA inspected personal property damage.
<i>Minor-High</i>	\$1,000 to \$1,999 of FEMA inspected personal property damage.
<i>Major-Low</i>	\$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 4 feet of flooding on the first floor.
<i>Major-High</i>	\$3,500 to \$7,499 of FEMA inspected personal property damage or 4 to 6 feet of flooding on the first floor.
<i>Severe</i>	Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

Table 37: Estimated Damage to Renter Applicant Dwellings

<i>Id</i>	Line Item	Count	Value
<i>A</i>	FEMA "renter" applicants in HUD Minor-Low damage category	75	\$133,125
<i>B</i>	FEMA "renter" applicants in HUD Minor-High damage category	31	\$263,934
<i>C</i>	FEMA "renter" applicants in HUD Major-Low damage category	117	\$1,250,730
<i>D</i>	FEMA "renter" applicants in HUD Major-High damage category	113	\$2,047,786

<sup>70</sup> Counts of damaged units are likely conservative because applicant level flood depth information was not utilized in this assessment.



<i>E</i>	FEMA "renter" applicants in HUD Severe damage category	41	\$2,447,536
<i>F</i>	Total renter applicants without a FEMA Contents Loss	356	631,900
<i>G</i>	Total SBA business applicants with verified repair, reconstruction, or relocation losses (rental NAICS code)	15	2,876,402
<i>H</i>	Potential Unmet Needs Population	341	\$605,275
<i>I</i>	Minor-Low Rebuilt Cost		\$1,775
<i>J</i>	Total verified loss of rental property (Estimated)	1,089	\$9,651,413

Totaling across all areas reveals total housing verified losses of at least \$73,275,890. Accounting for 30% in additional costs associated with necessary resilience measures such as more stringent building codes, cost of compliance measures, elevations, or freeboard requirements increases the total estimate of damages to more than \$95,258,657 (Table 38).

Table 38: Total Estimated Losses

Total Housing Losses	Amount
Verified Loss	\$73,275,890
Verified Loss + 30% resilience costs	\$95,258,657

Accounting for insurance, loans, and other recovery resources (Table 41) depicts the total benefit provided to DR-4451 victims to date. Here, more than \$16 million across federal, state, and local resources have been provided. Unfortunately, recovery funds provided to date still leave a large unmet housing need of greater than \$79 Million (Table 39).

Table 39: Sources and amounts of recovery funds (to date)

Id	Service	Count	Value
<i>A</i>	FEMA housing assistance payments	1,291	6,119,524
<i>B</i>	SBA home loan current real estate repair payments	195	5,832,700
<i>C</i>	SBA home loan current relocation payments	5	436,700
<i>D</i>	SBA home loan current reconstruction payments	21	2,199,200
<i>E</i>	SBA business loan payments to landlords	6	445,000
<i>F</i>	NFIP building payments	118	\$983,189
<i>G</i>	<b>Total Benefit</b>		<b>\$16,016,313</b>

Table 40: DR-4451, Unmet Housing Needs

Unmet Housing Needs	Amount
Total Unmet Housing Need to Pre-Storm Standards	\$57,259,577
Pre-Storm Standard unmet needs + 30% resilience costs	<b>\$79,242,344</b>

## 15. Infrastructure Impact

Infrastructure systems affected by floods and severe weather included damage to dams, roadways, bridges, barge and boat traffic, and agricultural systems. The immediate recovery efforts were well-documented by the RSS and by the initial project worksheets being submitted for Public Assistance, including from reports by the Missouri Flood Recovery Advisory Working Group.

### 15.1. Levees

Levees along numerous waterways were heavily damaged by floodwaters throughout 2019 in Missouri, prompting the U.S. Army Corps of Engineers to open a period of emergency levee rehabilitation program funding expected to last two years.<sup>71</sup> Though USACE does not expect levee rehabilitation to commence before spring 2020, about 105 requests for levee rehabilitation assistance were submitted to the Kansas City District office by mid-August 2019 while flooding continued on the Little Osage and Missouri Rivers, including at St. Joseph, Napoleon, and Miami, Missouri.<sup>72</sup> The USACE Kansas City District performed emergency repairs and inspections of levee systems in Missouri, noting that some 66 levee systems were overtopped during 2019, and of those 45 levee systems breached. Through August 2019, USACE placed rocks along stream banks to prevent unabated floodwater flows across the floodplains of Mill Creek and Big Tarkio River, running roughly from Cass County to Holt County, where a large breach prompted emergency evacuations at Craig in June. Though not specifically covered by FEMA's Public Assistance program, the USACE levee rehabilitation program, established under Public Law 84-99, will cover levee repairs for damages incurred from March 2019 through December 2019.<sup>73</sup>

### 15.2. Transportation

Widespread severe flooding and debris damage in 2019 caused numerous roads and bridges to fail throughout the State. In Holt County, about 11 roads remained closed in June, following a first round of closures in March and a second round in May.<sup>74</sup> Comprehensive road closure information remains elusive due to the emergency nature of response activities throughout the State that required impromptu solutions, though some counties utilized well-established response plans for Missouri River flood scenarios. However, the Missouri Department of Transportation is noted to have observed closures on about 470 routes in 114 counties between April 29 and June 14, 2019, including wash-outs of railroad tracks, suspension of rail and Amtrak services, airport closures, and disruptions of barge traffic on the Missouri River as navigation was suspended.<sup>75,76</sup> By October 2019, 341 sites were identified for repairs on state highways and roads, with an estimate of more than \$42 million in repair costs; further, detour costs along the Interstate 29 corridor were estimated at almost \$104 million to passenger, commercial, and recreational traffic.<sup>77</sup> In fact, the 187-mile closure of Interstate 29 between St. Joseph and Omaha, NE was the largest closure of an interstate highway in the history of the

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<sup>71</sup> <https://www.nwk.usace.army.mil/Missions/Emergency-Management/Levee-Rehabilitation/>

<sup>72</sup> <https://www.nwd.usace.army.mil/Media/News-Releases/Article/1936883/weekly-missouri-basin-flood-response-update-for-key-stakeholders-815/>

<sup>73</sup> <https://usace.contentdm.oclc.org/utis/getfile/collection/p16021coll7/id/12999>

<sup>74</sup> <http://holtcounty.org/index.php/flooding/>

<sup>75</sup>

[https://transportation.house.gov/imo/media/doc/Waters%20Testimony%20\(MO%20Levee%20and%20Drainage\).pdf](https://transportation.house.gov/imo/media/doc/Waters%20Testimony%20(MO%20Levee%20and%20Drainage).pdf)

<sup>76</sup> <https://dnr.mo.gov/floodrecovery/docs/2019-10-17-frawg-ppt.pdf>

<sup>77</sup> <https://dnr.mo.gov/floodrecovery/docs/2019-10-17-frawg-ppt.pdf>

interstate system.<sup>78</sup> Damage to rail transportation systems was estimated to be about \$40.5 million, impacts to air transportation including facility damages and economic losses of about \$16.5 million, and damages and losses to water transportation about \$181 million for at least 7 ports.<sup>79</sup> On the Mississippi River, St. Charles County reported about 11 road closures on March 30, 2020, including the closure of the Lakeview Drive subdivision at Highway B.<sup>80</sup> In the Missouri River floodplain counties of the northwest portion of the State, the Missouri Department of Transportation noted about 48 roads remain closed due to flooding, including the following roads as of April 8, 2020 (Table 41):<sup>81</sup>

Table 41: DR-4451, Roads closed due to severe storms

ROAD NAME	COUNTY	ROAD NAME	COUNTY
MO 111 N HOLT	Holt	RT D S CAPE GIRARDEAU	Cape Girardeau
MO 111 S ATCHISON	Atchison	RT E E ATCHISON	Atchison
MO 162 E NEW MADRID	New Madrid	RT E N PERRY	Perry
MO 162 W NEW MADRID	New Madrid	RT E S PERRY	Perry
MO 77 N MISSISSIPPI	Mississippi	RT E W ATCHISON	Atchison
MO 77 S MISSISSIPPI	Mississippi	RT P E NEW MADRID	New Madrid
MO 80 E MISSISSIPPI	Mississippi	RT P N PIKE	Pike
MO 80 W MISSISSIPPI	Mississippi	RT P S PIKE	Pike
MO 86 E NEWTON	Newton	RT P W NEW MADRID	New Madrid
MO 86 W NEWTON	Newton	RT U N ATCHISON	Atchison
RT AA E JEFFERSON	Jefferson	RT U S ATCHISON	Atchison
RT AA W JEFFERSON	Jefferson	RT V E ATCHISON	Atchison
RT AB N NEW MADRID	New Madrid	RT V W ATCHISON	Atchison
RT AB S NEW MADRID	New Madrid	RT W N HOLT	Holt
RT BB E ATCHISON	Atchison	RT W S HOLT	Holt
RT BB W ATCHISON	Atchison	RT WW E NEW MADRID	New Madrid
RT C E BARRY	Barry	RT WW W NEW MADRID	New Madrid
RT C W BARRY	Barry	RT Z E ATCHISON	Atchison
RT D N ATCHISON	Atchison	RT Z N WRIGHT	Wright
RT D N CAPE GIRARDEAU	Cape Girardeau	RT Z S WRIGHT	Wright
RT D S ATCHISON	Atchison	RT Z W ATCHISON	Atchison

### 15.3. Water & Wastewater Systems

Of the 32 drinking water systems and 71 wastewater systems impacted by flooding and severe weather, there were no lengthy closures.<sup>82</sup> A water main break at Lexington, Missouri could not be fixed for a

<sup>78</sup> <https://dnr.mo.gov/floodrecovery/docs/2019-11-22-frawg-ppt.pdf>

<sup>79</sup> <https://dnr.mo.gov/floodrecovery/docs/2019-10-17-frawg-ppt.pdf>

<sup>80</sup> <https://www.sccmo.org/1512/Road-Other-Closures---Flood>

<sup>81</sup> <http://traveler.modot.org/report/modottext.aspx?type=flood>

<sup>82</sup> <https://dnr.mo.gov/floodrecovery/docs/2019-08-27-frawg-ppt.pdf>

little over one week, and a volunteer organization, Convoy of Hope, supplied drinking water to residents until the main was repaired. Holt County and the Methodist Church in Fortescue also provided bottled water to residents without water, and Holt County EMA recommended Tdap and tetanus vaccinations for residents returning to flooded areas.<sup>83</sup> All systems were rapidly restored and remain operational.

## 16. Public Assistance

The FEMA Public Assistance (FEMA-PA) Program is designed to provide immediate assistance to impacted jurisdictions for emergency protective measures and permanent repairs to infrastructure and community facilities. The Federal share of assistance is generally not less than 75% of the eligible project cost, requiring the State to contribute the remaining 25% in cost share.

The Public Assistance Program for DR-4451 identified \$1,072,485 and \$3,897,876 in public assistance for Category A (Debris removal) and Category B (Emergency protective measures), respectively (Table 42).

Table 42. Public Assistance Category A and B totals by county<sup>84</sup>

County	Category A- Debris Removal		Category B - Emergency Protective Measure		Total of Category A & B	
	Number of Projects	Total Project Amount	Number of Projects	Total Project Amount	Number of Projects	Total Project Amount
<i>Cole</i>			213	\$384,817	213	\$384,817
<i>Holt</i>	99	\$33,096	108	\$8,638	207	\$41,733
<i>St. Charles</i>			70	\$56,066	70	\$56,066
<i>Barry</i>			224	\$3,462	224	\$3,462
<i>Boone</i>	241	\$35,480			241	\$35,480
<i>Buchanan</i>	161	\$179,041			161	\$179,041
<i>Cape Girardeau</i>	153	\$123,945	59	\$67,964	212	\$191,909
<i>Carroll</i>	5	\$11,900	9	\$12,773	14	\$24,672
<i>Chariton</i>	50	\$3,365	36	\$15,351	86	\$18,716
<i>Gasconade</i>			299	\$6,468	299	\$6,468
<i>Jackson</i>	210	\$5,000			210	\$5,000
<i>Lewis</i>			240	\$13,699	240	\$13,699
<i>Lincoln</i>	219	\$8,255			219	\$8,255
<i>Marion</i>	230	\$25,189			230	\$25,189
<i>Mississippi</i>	386	\$60,769	491	\$284,274	877	\$345,043
<i>Montgomery</i>	119	\$11,761			119	\$11,761
<i>New Madrid</i>			10	\$8,977	10	\$8,977
<i>Perry</i>			62	\$1,269,287	62	\$1,269,287
<i>Pike</i>	140	\$23,641	203	\$20,732	343	\$44,373
<i>Pulaski</i>	27	\$8,366			27	\$8,366

<sup>83</sup> <http://holtcounty.org/index.php/flooding/>

<sup>84</sup> Data collected 4/5/2020 from <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

County	Category A- Debris Removal		Category B - Emergency Protective Measure		Total of Category A & B	
	Number of Projects	Total Project Amount	Number of Projects	Total Project Amount	Number of Projects	Total Project Amount
Ray	136	\$74,975	445	\$1,380,290	581	\$1,455,265
Scott	177	\$111,774			177	\$111,774
Ste. Genevieve	154	\$11,000	200	\$51,133	354	\$62,133
Stoddard	346	\$15,967			346	\$15,967
Taney	34	\$10,126			34	\$10,126
Webster	25	\$12,982	20	\$9,454	45	\$22,436
Statewide	51	\$305,855	304	\$304,491	355	\$610,346
<b>Grand Total</b>	<b>2,963</b>	<b>\$1,072,485</b>	<b>2,993</b>	<b>\$3,897,876</b>	<b>5,956</b>	<b>\$4,970,361</b>

Additionally, the State has identified 12,667 projects across 34 counties totaling \$12,398,563 in public assistance need for Categories C-G (permanent repair) to date in the State-assessed counties (Table 43). These categories include:

- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Buildings and Equipment
- Category F: Utilities
- Category G: Parks, Recreational Facilities, and Other Facilities

Based on this data, and because applicants must prove where the 25% cost share will be covered from before any application is approved, the State should have no unmet need for public assistance projects. For the sake of understanding a potential, unprecedented worst-case scenario, if the counties were to have zero (\$0) matching funds for these projects the residual between total project amount and federal obligated share obligated would represent a potential unmet need of \$3,099,641 for identified infrastructure damage eligible under FEMA-PA Categories C-G (Table 43).

Table 43. Public Assistance Categories C-G totals by county<sup>85</sup>

County	C - Roads and Bridges	D - Water Control Facilities	E - Public Buildings	F - Public Utilities	G - Recreational or Other	Grand Total
Cole						
Holt	\$29,025	\$1,578,140			\$26,443	\$1,633,609
St. Charles						
Adair				\$5,684		\$5,684
Andrew	\$4,620					\$4,620
Atchison	\$616,329					\$616,329
Barry	\$41,457					\$41,457
Bates	\$203,617					\$203,617
Bollinger	\$149,625					\$149,625
Buchanan	\$69,455					\$69,455

<sup>85</sup> <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

<b>County</b>	<b>C - Roads and Bridges</b>	<b>D - Water Control Facilities</b>	<b>E - Public Buildings</b>	<b>F - Public Utilities</b>	<b>G - Recreational or Other</b>	<b>Grand Total</b>
<i>Caldwell</i>	\$713,187					\$713,187
<i>Cape Girardeau</i>	\$142,366				\$5,000	\$147,366
<i>Carroll</i>	\$53,841		\$12,355			\$66,196
<i>Chariton</i>	\$12,299					\$12,299
<i>Daviess</i>	\$459,664			\$841,230		\$1,300,894
<i>Dunklin</i>	\$266,308					\$266,308
<i>Gasconade</i>	\$29,738		\$31,706		\$83,912	\$145,356
<i>Grundy</i>	\$14,623					\$14,623
<i>Harrison</i>	\$10,509					\$10,509
<i>Henry</i>	\$42,276			\$6,232		\$48,508
<i>Lewis</i>	\$291,288		\$12,598	\$4,627		\$308,513
<i>Mississippi</i>	\$943,200	\$146,432				\$1,089,633
<i>New Madrid</i>	\$6,748			\$87,111	\$11,700	\$105,559
<i>Ozark</i>	\$101,026					\$101,026
<i>Pemiscot</i>	\$496,441			\$1,083,708		\$1,580,150
<i>Perry</i>	\$51,180	\$16,433				\$67,612
<i>Pike</i>		\$4,468				\$4,468
<i>Pulaski</i>	\$5,279					\$5,279
<i>Ray</i>	\$27,089					\$27,089
<i>Scott</i>	\$76,070					\$76,070
<i>St. Louis (city)</i>					\$4,281	\$4,281
<i>Ste. Genevieve</i>	\$154,358					\$154,358
<i>Taney</i>					\$10,418	\$10,418
<i>Texas</i>	\$7,513					\$7,513
<i>Webster</i>	\$179,017					\$179,017
<i>Statewide</i>	\$92,870			\$3,135,065		\$3,227,936
<b>Grand Total</b>	<b>\$5,291,019</b>	<b>\$1,745,473</b>	<b>\$56,659</b>	<b>\$5,163,658</b>	<b>\$141,754</b>	<b>\$12,398,563</b>

Table 44. Potential infrastructure unmet need

<b>County</b>	<b>Grand Total</b>	<b>Total Federal Obligation</b>	<b>Local Match (Potential Unmet Need)</b>
<i>Cole</i>			
<i>Holt</i>	\$1,633,609	\$1,225,206	\$408,402
<i>St. Charles</i>			
<i>Adair</i>	\$5,684	\$4,263	\$1,421
<i>Andrew</i>	\$4,620	\$3,465	\$1,155
<i>Atchison</i>	\$616,329	\$462,247	\$154,082
<i>Barry</i>	\$41,457	\$31,093	\$10,364
<i>Bates</i>	\$203,617	\$152,713	\$50,904
<i>Bollinger</i>	\$149,625	\$112,219	\$37,406
<i>Buchanan</i>	\$69,455	\$52,091	\$17,364

<b>County</b>	<b>Grand Total</b>	<b>Total Federal Obligation</b>	<b>Local Match (Potential Unmet Need)</b>
<i>Caldwell</i>	\$713,187	\$534,890	\$178,297
<i>Cape Girardeau</i>	\$147,366	\$110,524	\$36,841
<i>Carroll</i>	\$66,196	\$49,647	\$16,549
<i>Chariton</i>	\$12,299	\$9,225	\$3,075
<i>Daviess</i>	\$1,300,894	\$975,670	\$325,223
<i>Dunklin</i>	\$266,308	\$199,731	\$66,577
<i>Gasconade</i>	\$145,356	\$109,017	\$36,339
<i>Grundy</i>	\$14,623	\$10,967	\$3,656
<i>Harrison</i>	\$10,509	\$7,882	\$2,627
<i>Henry</i>	\$48,508	\$36,381	\$12,127
<i>Lewis</i>	\$308,513	\$231,385	\$77,128
<i>Mississippi</i>	\$1,089,633	\$817,224	\$272,408
<i>New Madrid</i>	\$105,559	\$79,169	\$26,390
<i>Ozark</i>	\$101,026	\$75,770	\$25,257
<i>Pemiscot</i>	\$1,580,150	\$1,185,112	\$395,037
<i>Perry</i>	\$67,612	\$50,709	\$16,903
<i>Pike</i>	\$4,468	\$3,351	\$1,117
<i>Pulaski</i>	\$5,279	\$3,959	\$1,320
<i>Ray</i>	\$27,089	\$20,317	\$6,772
<i>Scott</i>	\$76,070	\$57,052	\$19,017
<i>St. Louis (city)</i>	\$4,281	\$3,211	\$1,070
<i>Ste. Genevieve</i>	\$154,358	\$115,768	\$38,589
<i>Taney</i>	\$10,418	\$7,813	\$2,604
<i>Texas</i>	\$7,513	\$5,635	\$1,878
<i>Webster</i>	\$179,017	\$134,263	\$44,754
<i>Statewide</i>	\$3,227,936	\$2,420,952	\$806,984
<b>Grand Total</b>	<b>\$12,398,563</b>	<b>\$9,298,922</b>	<b>\$3,099,641</b>

### 17. HMGP and Resilience

The Hazard Mitigation Grant Program (HMGP) will be a critical part of long-term resilience improvements for infrastructure in the impacted area. According to FEMA,

“Federal funding under the HMGP is available following a major disaster declaration if requested by the Governor. HMGP funding is allocated using a “sliding scale” formula based on the percentage of funds spent on Public and Individual Assistance for each Presidentially declared disaster. For States with a FEMA-approved Standard State Mitigation Plan, the formula provides for up to 15% of the first \$2 billion of estimated aggregate amounts of disaster assistance, up to 10% for amounts between \$2 billion and \$10 billion, and 7.5% for amounts between \$10 billion and \$35.333 billion. For States with a FEMA-approved Enhanced Mitigation Plan, up to 20% of the total of Public

and Individual Assistance funds authorized for the disaster (up to \$35.333 billion of such assistance) are available.”<sup>86</sup>

Because Missouri currently has a FEMA-approved Enhanced State Hazard Mitigation Plan<sup>87,88</sup> and not a Standard Mitigation plan, the percentage of available HMGP funding should be calculated at 20% of the total amount of IA and PA allocated to a disaster event. As of July 17, 2020, FEMA has allocated \$7,447,658.89 in Individual Assistance and \$24,977,166.92 in Public Assistance.<sup>89</sup> Therefore, the amount available for mitigation and resilience activities statewide will likely be between \$6.4 and \$7 million.

Then, calculating that HMGP assistance to any jurisdiction is capped at 75% of the identified need (the remaining 25% being a required local match), it can be assumed that Missouri’s state and local jurisdictions will be required to provide between \$1.6 and \$1.85 million in local match, representing an unmet need for resilience improvements. The HMGP process is in its initial stages at this time and will be rolled out over the coming months.

## 18. Existing Efforts by Missouri CDBG Non-Entitlement Program

The State of Missouri’s Community Development Block Grant (CDBG) Program, operated by Missouri’s Department of Economic Development, is expected to receive an annual allocation of \$23,292,211 from HUD in 2020. The Program is dedicating approximately \$15.9 million of this to community infrastructure activities such as water, sewer, roads, drainage, or other eligible infrastructure activities. The remaining program funds, excluding state & local planning and administrative costs, include \$3.6 million for community facilities, and \$2 million for industrial infrastructure.

## 19. Economic Impact

### 19.1 Business & Employment

HUD describes methods for determining serious unmet economic revitalization needs using a count of businesses falling within each of several damage categories (Table 45). The HUD method requires first, a calculation of damage to real estate (repair, rebuild, relocate) and contents (machinery, furniture, inventory). Each SBA application is then classified into one of five categories based on this estimate of damage and the median damage for each category is produced from these groupings.

Table 45. Summary of SBA applicants based on Federal Register serious unmet economic needs.

HUD Cat	Damage	Count of all SBA Applicants	Median Damage	Percentage of All Businesses
Category 1	< \$12,000	9	\$4,870	8.82%
Category 2	\$12,000 - \$29,999	8	\$18,512	7.84%
Category 3	\$30,000 - \$64,999	11	\$35,012	10.78%
Category 4	\$65,000 - \$149,999	9	\$104,682	8.82%

<sup>86</sup> [https://www.fema.gov/media-library-data/1521210872717-2a5eb11ea35808dc1f0a4965b1e3944f/Hazard\\_Mitigation\\_Grant\\_Program\\_Pamphlet.pdf](https://www.fema.gov/media-library-data/1521210872717-2a5eb11ea35808dc1f0a4965b1e3944f/Hazard_Mitigation_Grant_Program_Pamphlet.pdf)

<sup>87</sup> <https://www.fema.gov/hazard-mitigation-plan-status>

<sup>88</sup> [https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/MO\\_Hazard\\_Mitigation\\_Plan2018.pdf](https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/MO_Hazard_Mitigation_Plan2018.pdf)

<sup>89</sup> <https://www.fema.gov/disaster/4451>



Category 5	>= 150000	18	\$264,211	17.65%
Category 0	No Losses	47		46.08%
Grand Total		102		

Then, a count of those SBA applicants who were wither declined loan assistance or had applications in process at the time of the data collection<sup>90</sup> represents the unmet needs for the business community. These counts are multiplied by the median damage to gain perspective on possible unmet needs (Table 46). According to this method, serious unmet business needs for flood, tornado, and severe weather amount to about \$7.9 million.

Table 46. Estimate of SBA applicants either denied a loan or in process based on Federal Register serious unmet economic needs.

HUD Cat	Damage	Count of all SBA Applicants	Median Loss	Federal Register Estimate of Unmet Need
Category 1	< \$12,000	9	\$4,870	\$43,830
Category 2	\$12,000 - \$29,999	8	\$18,512	\$148,096
Category 3	\$30,000 - \$64,999	11	\$35,012	\$385,132
Category 4	\$65,000 - \$149,999	9	\$104,682	\$942,138
Category 5	>= 150000	18	\$264,211	\$4,755,798
No Category		47	\$35,012	\$1,645,564
Grand Total		102		\$7,920,558

The impacts and unmet needs caused by 2019’s floods, tornadoes, and severe weather in business are greatly underestimated using this method as it fails to account for the possibility that people/businesses have been impacted and have not recovered but are choosing not to shoulder debt for this recovery. For this reason, we take a modified approach to understand, more completely, impacts, support, and unmet needs for the business community.

**As of April 9, 2020, the Small Business Administration (SBA) has issued \$740,600 in Business and Economic Injury Disaster Loans (EIDL) to the State impacted area covered in this assessment.**<sup>91</sup> The three most impacted counties—Cole, Holt, and St. Charles—had more than 44 SBA business loan applications, while the remaining 23 counties had 50 applicants (Table 47). Entities such as small businesses, small agricultural cooperatives, and most private nonprofit organizations in disaster impacted areas may apply for low-interest EIDL loans to assist with operating expenses and working capital. The Business Physical Disaster Loss loans are available for machinery, equipment, and other real-property damages.

Utilizing all SBA business data rather than a subset of declined businesses to understand the financial impact to livelihoods provides a more comprehensive understanding of impacts and recovery across the State. The small business administration makes low cost disaster loans available to qualified businesses. A summary of SBA applicants (Table 49) shows that on 24 of the 94 applicants were approved, a majority (44) were declined or not recommended, and 42 were withdrawn. According to SBA business

<sup>90</sup> 8/15/2019

<sup>91</sup> SBA Business Application Report, 4/6/2020

loan information, approximately 109 applicants had a verified property loss of \$4.8 million. The average verified loss for all applicants was \$127,707. Utilizing the general methodology put forth for the housing impact and unmet needs enables us to identify the true impact and possible extra estimated impacts for businesses who did not qualify for loans.

Table 47. Small Business Administration Applicants by County

County	Number of SBA Applicants	Approved	Declined / Not Recommended	Withdrawn
Cole	10	2	2	6
Holt	12	3	6	3
St. Charles	22	7	9	6
Andrew	3	1	0	2
Atchison	5	1	2	2
Boone	1	0	1	0
Buchanan	4	0	2	2
Callaway	2	1	1	0
Carroll	3	0	1	2
Chariton	0	1	2	3
Greene	2	0	0	2
Jackson	9	3	4	2
Jasper	1	0	1	0
Jefferson	1	0	1	0
Lafayette	2	2	0	0
Lewis	0	1	2	3
Lincoln	2	0	1	1
Livingston	2	0	2	0
McDonald	5	1	2	2
Miller	1	0	1	0
Newton	2	0	0	2
Osage	0	1	2	3
Pike	3	0	2	1
Platte	2	0	2	0
Pulaski	0	0	0	0
Saline	0	0	0	0
Grand Total	94	24	46	42

Table 48 outlines the impacts, estimated impacts, and support provided by the SBA to business owners across the impacted counties. Here the total real property loss of \$19,456,169 is captured by summing verified repair losses (A) with verified reconstruction losses (C) and estimated repair (B) and reconstruction losses (D). Here, estimated repair losses are calculated by multiplying the median repair cost by the number of applicants who did not have an SBA verified loss. Estimated reconstruction losses are calculated as the product of the median reconstruction loss and the estimated number of applicants who would fall into this category (the product of the ratio of applicants within a category and those with no damage estimate).

Next, the same method was used to sum the verified and estimated losses to furniture (F and G), machinery (H and I), inventory (J and K), and business operating expenses (L and M) resulting in a total estimated operational loss to \$4,151,815 for all businesses. According to this method, total business impacts from 2019’s severe weather was \$23,607,984. When accounting for resilience requirements

(30% increase in rebuilding but not operations), the total impact to businesses in Missouri was \$29,444,835. SBA payouts to businesses totaled \$3,218,000 for these lines of loss, leaving a potential unmet need of **\$26,226,835**.

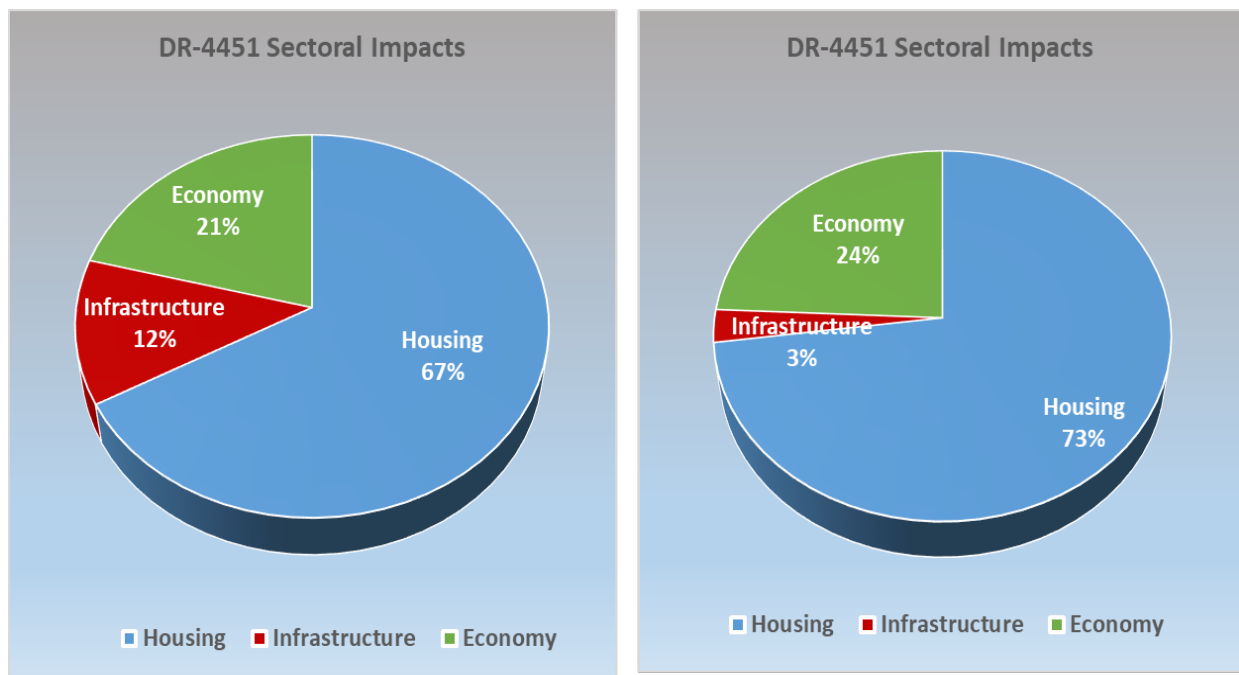
Table 48. SBA Derived Impact and Unmet needs for businesses

<b>Small Business Administration Verified Business Property Loss of All SBA Applicants</b>			
		<b>Count</b>	<b>Value</b>
<b>A</b>	SBA applicants with a real estate verified loss (Repairs)	38	\$ 4,852,871
<b>B</b>	SBA applicants without a real estate verified loss (Repair Estimate)	64	\$ 4,498,688
<b>C</b>	SBA verified reconstruction loss (Rebuild)	8	\$ 4,176,064
<b>D</b>	Estimated reconstruction loss (Rebuild)	13	\$ 5,928,546
<b>E</b>	Total real estate losses for businesses referred to SBA (Estimate)		\$ 19,456,169
<b>Small Business Administration Verified (and Estimated) Business Operating Loss of All SBA Applicants</b>			
<b>F</b>	Verified furniture loss	22	\$ 204,763
<b>G</b>	Furniture Loss (Estimate)	37	\$ 302,461
<b>H</b>	Verified machinery loss	32	\$ 1,558,065
<b>I</b>	Machinery loss (Estimate)	54	\$ 605,238
<b>J</b>	Verified inventory loss	3	\$ 3,001
<b>K</b>	Inventory Loss (Estimate)	5	\$ 21,898
<b>L</b>	Verified EIDL Loss	17	\$ 740,600
<b>M</b>	EIDL Loss (Estimate)	29	\$ 715,789
<b>N</b>	Sum of operational losses		\$ 4,151,815
<b>O</b>	Total verified loss for all businesses (Estimate)		\$ 23,607,984
<b>P</b>	<b>Accounting for 30% resilience addition</b>		\$ 29,444,835
<b>Duplication of Benefits</b>			
<b>Q</b>	SBA repair payments	12	\$ 1,357,400
	SBA reconstruction payments	1	\$ 80,300
<b>R</b>	SBA furniture payments	6	\$ 54,400
<b>S</b>	SBA machinery payments	12	\$ 960,000
<b>T</b>	SBA inventory payments	5	\$ 25,300
<b>U</b>	SBA EIDL payments	17	\$ 740,600
<b>V</b>	Total Benefit		\$ 3,218,000
<b>Overall Business Unmet Needs</b>			
<b>W</b>	Total unmet business repair/replace estimate		\$ 18,098,769
<b>X</b>	Total unmet business operation estimate		\$ 2,371,515
<b>Y</b>	Total unmet business needs estimate		\$ 20,470,284
<b>Z</b>	<b>Accounting for 30% resilience addition</b>		\$ 26,226,835

## 19.2. Unmet Needs Summary

Damages and unmet needs from Missouri's severe storms to housing, infrastructure, and economy were identified in this assessment with housing impacts and associated unmet needs standing out among these three categories. Missouri's substantial damage to housing across the impacted counties (\$79.2 million) accounts for 67% of total estimated losses in comparison to the economic sector (\$29.8 million) or 21% of estimated total losses and the infrastructure sector (\$17.4 million) or 12% of total losses (Figure 49A). After accounting for available recovery resources, the housing sector overall percentage of unmet need increases slightly in comparison to the infrastructure and economic sectors (Figure 49B).

Figure 49. A: Estimated losses by sector as a percentage of total losses, and B: Estimated unmet need.



Total housing unmet needs are \$79.2 million, while unmet business needs were just under \$26.4 million and estimated infrastructure unmet needs are just over \$3 million. Within the housing impacted populations are both a high number of single-family residential units and a sizable renter population. Recovery programs aimed at these two groups should have high return and lead to substantial progress in overall recovery from the storm. Additionally, a continued focus on home buyouts aimed at managed retreat from hazard zones will pay dividends into the future by reducing the potential for repetitive loss. Specifically, removing at risk structures from flood zones will help residents be more resilient in future flood disasters.

## 20. CONNECTIONS BETWEEN NEEDS AND ALLOCATION(S) OF FUNDS

As evidenced by the Unmet Needs Assessment, Missouri has a total unmet need in excess of \$108 million dollars. Overall, 72.8% of the disaster damage was in housing with over 24.2% in economic revitalization and 2.85% in infrastructure. For these reasons, Missouri will focus exclusively on meeting the Housing Unmet Needs.

Based upon the Unmet Needs Assessment, Missouri will attempt to spend all the funding on those citizens who belong to vulnerable populations. Citizens belonging to a vulnerable population are less likely to recover themselves. Missouri’s vulnerable populations are:

- Low to Moderate Income (LMI) households- households with incomes below 80% of the county’s Average Median Income (AMI)
- Households with children 5 years of age and under
- Single parent households
- Households with Citizens 65 years of age or older
- Female head of household
- Households with disabled or special needs members

One of the largest segments of Missouri’s vulnerable populations is LMI households. These are households that make 80% or less of the average median income (AMI) for their county. These households will be a focus of Missouri’s recovery. Given this, the 2019 DR-4451 CDBG-DR Program is focused on the HUD National Objective of Benefit to Low- to Moderate-Income population.

Based again on the Unmet Needs Assessment, Missouri concurs with HUD analysis of the three Most Impacted and Distressed (MID) areas. Specifically, as noted in the January 27, 2020 HUD notice in the Federal Register, areas in Cole, Holt, and St. Charles counties were devastated by either flooding or tornado damage. Given the grant award of \$30.7 Million Dollars and the fact that housing unmet need was 73% (\$79,242,344) of the total unmet need, Missouri has chosen to allocate all funding from this grant to housing programs in these three counties. With this Action Plan, Missouri also looks to the future to avoid repeated flooding incidents while strengthening, mitigating, and adding resilience to this segment of the population.

The CDBG-DR Grant is for \$30,776,000. \$1,538,800 will be used by the State of Missouri for Administrative costs. The State of Missouri also is setting aside \$1,000,000 for planning with \$250,000 going to each of the three MID counties and the State. The remaining \$28,237,200 will be used for the delivery of Program activities in the three MID counties. Allocation of Program Delivery funding for use in the three MID counties is based on the MID Indicator and % of LMI Homeowners from the Unmet Needs Assessment. Below is the allocation for use in each of the three MID counties.

COUNTY	% ALLOCATED	\$ ALLOCATED
Cole	25%	\$ 7,059,300
Holt	20%	\$ 5,647,440
St. Charles	55%	\$15,530,460
<b>TOTAL</b>	100%	\$28,237,200

The State of Missouri retains the ability to re-allocate any funds set aside for use in one of the three MID counties to another, if there are no remaining beneficiaries or projects in a county.

## 21. RECONSTRUCTION OF PUBLIC HOUSING, AFFORDABLE HOUSING AND OTHER FORMS OF ASSISTED HOUSING

### 21.1 Identification and addressing rehabilitation, reconstruction, replacement, and new construction of housing including Public Housing Assistance (PHA)



Jefferson City, Fox4 Kansas City

Missouri’s 2019 DR-4451 Disaster Recovery program will be implemented in the three counties designated in the January 27, 2020 Federal Register as “Most Impacted and Distressed” (MID). Missouri is committed to nine Program activities that are supportive to housing recovery and restoration:

Housing, including:

- Acquisition for Demolition Only
- Construction of New Affordable Housing (For Homeownership)
- Affordable Multifamily Rental Housing
- Local Voluntary Buyout
- Down Payment Assistance for Home Ownership
- Homeowner Rehabilitation

Public Service, including:

- Housing Counseling

Infrastructure to Support Housing Recovery Efforts and Affordable Housing

Planning

Missouri will implement a program that is Housing centric and primarily focused on serving LMI and vulnerable population citizens. Missouri’s 2019 DR-4451 CDBG-DR Housing Program will only be implemented in the three MID counties.

Per the January 27, 2020 Federal Register, Missouri will seek to leverage funding from other sources to assist the CDBG-DR funding in the creation of affordable housing.

New Construction of Multifamily housing in Missouri’s CDBG-DR Program will look to the replacement of affordable housing stock in communities that face needs for restoring and improving the affordable housing stock as a result of the 2019 DR-4451 disaster events. Multifamily Housing will be leveraged by LIHTC or other Missouri Housing Development Commission multifamily funding.

Missouri will require Green Building Standards for all new construction of residential buildings. In addition, Missouri will incorporate a Resilient Home Construction Standard. The Housing Program policies and procedures will include further details for these standards along with Quality Construction Standards.

## **21.2 Affordability Period and Resale/Recapture Provisions**

In accordance with HUD guidance, Missouri will require the following affordability periods:

- A minimum five-year affordability period on all newly constructed affordable single-family housing for homeownership.
- A minimum fifteen-year affordability period on all properties for development of newly constructed affordable small rental (4 units or less) units.
- A minimum fifteen-year affordability period on all rehabilitation or reconstruction of Multifamily rental projects with 8 or more units
- A minimum twenty-year affordability period on all newly constructed affordable Multifamily (5 units or more) housing complex projects

The State will develop and impose recapture affordability restrictions for single-family housing for homeownership that is made possible by CDBG-DR funded acquisition. This will enable affordable homeownership for LMI persons, and the enforcement of those recapture restrictions through recorded deed restrictions, covenants, or other similar mechanisms, for a period not less than five years. Missouri will establish recapture requirements for housing funded by the program and shall outline those requirements in the program’s policies and procedures. The recapture provisions will clearly describe the terms of the recapture provisions, the specific circumstances under which these provisions will be used, and how the provisions will be enforced in all signing events prior to the start of reconstruction, construction or home signing. Developer agreements will include recapture affordability restrictions for small rental and multifamily projects.

## **22. PROMOTE HOUSING FOR VULNERABLE POPULATIONS**

### **22.1 Prevention of Homelessness**

Missouri’s 2019 DR-4451 CDBG-DR Program intends to prevent the homelessness of vulnerable populations by prioritizing the following vulnerable populations:

- Low to Moderate Income (LMI) households- households with incomes below 80% of the county’s Average Median Income (AMI)
- Households with children 5 years of age and under
- Single parent households
- Households with Citizens 65 years of age or older
- Female head of household
- Households with disabled or special needs members



Proposals from UGLGs in the MIDs must identify, and seek to resolve through construction, reconstruction or planning, any loss of private market units receiving project-based assistance, or with tenants that participate in the Section 8 Housing Choice Voucher Program, or the loss of any other housing units otherwise assisted under a HUD program.

Further, proposals must identify, and seek to resolve through construction, reconstruction or planning, any unmet needs for transitional housing, permanent supportive housing, and permanent housing needs for individuals and families that are homeless and at-risk of homelessness.

Finally, proposals must identify, and seek to resolve through construction, reconstruction or planning, unmet needs for supportive housing for otherwise vulnerable populations, such as housing for the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents.

## 22.2 Missouri Prioritization of Service Point Chart

CDBG-DR funding for Missouri’s disaster is limited, and the State of Missouri desires to prioritize those households which are the least likely to recover themselves. Households which typically are the least likely to recover from a disaster belong to one or more of Missouri’s vulnerable populations.

To prioritize these vulnerable populations in the recovery process, each household application will be scored, using the chart below, during intake to determine a prioritization score. The maximum prioritization scores a household could receive is 13. The prioritization score will be used in Missouri’s Down Payment Assistance for Home Ownership activity, and Homeowner Rehabilitation activity.

A prioritization of service list will be developed with scores of 13 at the top and descending to scores of 0. Household applicants that have the same score will be prioritized by date of application completion; earliest to latest. *Example: There are three scores of 13. Their applications were completed on 14 May 2020, 21 January 2020, and 8 April 2020. The order of prioritization (service) would be the household applicant on 21 January, then 8 April and then 14 May.*

Vulnerable Population	Points
Low- to Moderate-Income <30% AMI	4
Low- to Moderate-Income 31-50% AMI	3
Low- to Moderate-Income 51-80% AMI	2
Income AMI 81-120%	1
Households with children age 5 and under	2
Single Parent Households	1
Households with citizens 65 years of age or older	3



Female Head of Household	1
Disabled/Special Needs Household	2

### 22.3 Accessibility Accommodations

Missouri’s 2019 DR-4451 CDBG-DR Program will meet accessibility standards, provide reasonable accommodations to persons with disabilities, and take into consideration the functional needs of persons with disabilities in accordance with guidance 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](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.

### 22.4 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 ensure UGLGs 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 UGLGs participating in this program will be required to certify that they will administer their activities in accordance with the Fair Housing Act and that the program will affirmatively further fair housing. Missouri will ensure there is no discrimination of any applicant to this program because of race, color, religion, national origin, sex, families with children, and persons with handicaps.

## 23. MINIMIZE OR ADDRESS DISPLACEMENT

### 23.1 Minimizing Displacement Strategies

Missouri will ensure 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 LMI persons.

The purpose of a local 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. UGLGs implementing the Local Voluntary Buyout, Acquisition for Demolition Only, Acquisition and Construction of New Affordable Housing activities will apply the Uniform Relocation Act (URA) and its standards in a manner which ensures that equitable relocation treatment is available to all persons.

Based upon the Unmet Needs Assessment, Tenant Relocation Assistance is not a defined program activity in this disaster recovery strategy. However, Missouri will ensure full compliance with URA should the program discover a renter in a home being bought out or acquired as part of the program. Tenant Relocation may be applicable to both the buyout and acquisition activities. The State of Missouri

recognizes the requirements of URA and will ensure as UGLGs, Non-Profit and For-Profit developers' buyout and acquire homes, they will abide by the State's policies & procedures, as well as the following terms and conditions.

## **23.2 Waivers**

To promote 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. Notwithstanding any provisions of the law, no person otherwise eligible for any kind of replacement housing payment under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) shall be denied such eligibility as a result of his or her being unable, because of a major disaster as determined by the President, to meet the occupancy requirements set by (the URA)<sup>92</sup>.

### **One-for-one replacement**

Requirements at section 104(d)(2)(A)(i) and (ii) and (d)(3) of the HCD Act and 24 CFR 42.375 regarding one-for-one replacement are waived in connection with funds allocated under this notice for lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation. This waiver exempts disaster damaged units that meet are "not suitable for rehabilitation", defined by the Missouri CDBG-DR Program as those units for which the cost of rehabilitation, including clear consideration for resolving issues affecting health and safety, exceeds the cap allowed for the project type.

### **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 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.

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<sup>92</sup> <https://www.govinfo.gov/content/pkg/FR-2018-02-09/pdf/2018-02693.pdf>

## 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 Missouri with maximum flexibility in developing optional relocation policies with CDBG-DR funds.

Low-income households permanently displaced because of CDBG-DR activities will be provided with relocation assistance under the URA and implementing regulations at 49 CFR Part 24.

### **23.3 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 to prevent undue financial burden on established owners and tenants.
3. Adopt policies which provide reasonable protections for tenants residing in affected properties.
4. If feasible, demolish only dwelling units that are not occupied or vacant occupiable “dwelling units” (as defined in 24 CFR 42.305).
5. Target only those properties deemed essential to the need or success of the project to avoid displacement that is unnecessary.

### **23.4 Mitigation and Long-Term Recovery Planning**

Missouri has designed a program to promote the movement of persons and families from the floodway and floodplain. The Housing program continues a long-standing local voluntary 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 programs 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.



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## **24. MAXIMUM ASSISTANCE AND COST REASONABLE ASSESSMENT**

### **24.1 Maximum Assistance Available**

Maximum Assistance Available figures are outlined on the following table. State Planning activities are capped at \$250,000.00 and allowable uses include planning activities that promote Mitigation, Preparedness and Resilience of the State. Key Findings of the Community Planning and Capacity Building (CPCB) Recovery Support Function (RSF) and Economic RSF published in the Recovery Support Strategies,<sup>93</sup> identified significant planning capacity, and impact data collection deficiencies Statewide.

Recognizing the systemic need for Statewide Planning and capacity for Planning, Missouri will conduct procurement for Planning to address any Planning need identified in the MDRF's Recovery Support Strategies or 83 FR 5851, 83 FR 5855, 83 FR 5856. Scope of work will reflect actionable and reasonable Planning and related activities identified in the 83 FR or Recovery Support Strategies, and may be conducted in collaboration with any of the Coordinating Agencies and Supporting Partners identified therein to guide recovery, in concordance with 83 FR 5855 and 83 FR 5856.

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<sup>93</sup> <https://recovery.mo.gov/media/pdf/recovery-support-strategies>

Initiation of Procurement for State Planning may occur as early as July 2021, with completion of deliverables to occur within 36 months of Contract initiation.

2019 MISSOURI CDBG-DR FUNDING			
FUNDING	% of GRANT	AMOUNT	\$ AMOUNT BREAKDOWN
Total Grant Funding	100%	\$30,776,000	
Administration Funding	5%	\$1,538,800	\$1,538,800 State Administration of Grant
Planning Funding	3%	\$1,000,000	\$250,000 State Planning \$250,000 Holt County for Local Mitigation, Preparedness and Resilience Planning \$250,000 Cole County for Local Mitigation, Preparedness and Resilience Planning \$250,000 St. Charles County for Local Mitigation, Preparedness and Resilience Planning
Program Delivery Funding	92%	\$28,237,200	\$7,059,300 Cole County <i>Minimum \$4,941,510 to benefit LMI</i> \$5,647,440 Holt County <i>Minimum \$3,953,208 to benefit LMI</i> \$15,530,460 St. Charles County <i>Minimum \$10,871,322 to benefit LMI</i>
HUD Requirement for 70% (\$19,766,040) of the Program Delivery Total Funding to Benefit Low to Moderate Income Households			
ACTIVITY OPTIONS			
PROGRAM TYPE	ACTIVITY	POSSIBLE NATIONAL OBJECTIVE	
Planning	Local Planning	Planning is presumed to meet a National Objective under the Entitlement Regulations	
Public Services	Housing Counseling	LMI or Urgent Need	
Infrastructure	Infrastructure to Support Housing Recovery and Affordable Housing	LMI Area Benefit, LMI Benefit or Urgent Need	
Housing	Acquisition for Demolition only	Elimination & Prevention of Slum & Blight	
Housing	Construction of New Affordable Housing (for Homeownership)	LMH or Urgent Need	
Housing	Affordable Multifamily Rental Housing	LMI Benefit	
Housing	Down Payment Assistance for Home Ownership	LMI or Urgent Need	
Housing	Homeowner Rehabilitation	LMI or Urgent Need	
Housing	Local Voluntary Buyout	LMI Area Benefit, LMI Benefit or Urgent Need	
Housing	Housing Incentive for Replacement Assistance	LMI, LMHI Benefit	

## **24.2 Exceptions Process**

Missouri will establish the policy for Units of General Local Governments (UGLGs) to provide exceptions on a case-by-case basis to the maximum amount of assistance or cost effectiveness criteria utilized. 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.

## **24.3 Cost Reasonableness**

The State of Missouri’s policies and procedures will address controls for assuring construction costs are consistent with the market cost at the time and place of construction, including a description addressing controls for housing projects involving 8 or more units. Standard Agreements with jurisdictions will include subrogation clauses in case of the event of non-compliance with the applicable requirements and regulations. Missouri, with its geography consisting of multiple rivers and tributaries, has a long history of disaster recovery from historical flooding with many areas suffering from repeated flooding. Given this situation, the best method of mitigating against future costs is the use of a holistic and integrated strategy which includes local voluntary buyouts and acquisitions. Missouri will conduct local voluntary buyouts of properties that are prone to future flooding and reduce the long-term cost of repeated flooded areas. The cost-benefit of buying out these homes is produced in varied ways. Key among these are savings derived from first responders not having to assist flooded families, future CDBG-DR and or CDBG-MIT funds being used to increase resilience on homes as opposed to using those funds in continually flooded areas, and the long term use of flood-prone property which doesn’t impact citizen housing.

## **25. PLANNING & COORDINATION**

### **25.1 Promotion of Sound, Sustainable Long-Term Recovery Planning**

Missouri is committed to sustainable Long-Term Recovery. Based upon an extensive unmet needs’ assessment combined with experience from several recent disasters and CDBG-DR centered recoveries, Missouri is determined to conduct a holistic recovery focused on assisting those deemed as most vulnerable. Missouri has also undertaken an analysis of all available FEMA data garnered from the disaster and conducted an in-depth analysis of all available land use documents and FEMA flood maps and zones. The State of Missouri’s Disaster Recovery Program does not plan on or foresee any construction requiring elevation; but does recognize the new Advisory Base Flood Elevation (ABFE) requirement in 83 FR 5850.

Missouri has conducted coordination with numerous agencies from around the State. In accordance with the HUD notice establishing this grant, Missouri has focused all efforts on the zip codes listed in the Federal Register release and those citizens residing in those counties. All efforts and funding from this grant are dedicated to the three counties of Cole, Holt and St. Charles counties. Further, Missouri will only serve citizens in those presidentially declared Most Impacted and Distressed counties who are Low-to Moderate-Income or other vulnerable populations.

Missouri has coordinated with the Regional Planning Commissions, directly with the most impacted and distressed counties, and with the citizens in each. Given the amount of damage combined with the amount of the grant, Missouri will only serve LMI and vulnerable population citizens and in these areas.

With the submission of Planning proposals, Missouri will require the UGLG to consider and document the impacts of the proposed Planning activities and how they may affect members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, as well as concentrated areas of poverty, and vulnerable communities. DED will take into account the proposed project's effect on protected classes when evaluating the proposal. DED will provide technical assistance for the UGLG to achieve this goal to the best of its ability.

UGLGs are required to submit maps with the proposal that show the location of the target area, the housing facility deficiencies as applicable to the planning process proposed, low to moderate income concentrations, and minority concentrations at a block group level. Additionally, applicants are required to describe the jurisdiction's overall community development planning needs, the alternative target areas considered within the jurisdiction for planning, and the rationale for the target area selected. UGLGs must demonstrate to DED that a thorough review has been conducted at the local level that assesses areas of greatest need throughout the jurisdiction for planning.

## **26. ELEVATION STANDARDS**

The State of Missouri's 2019 DR-4451 Disaster Recovery Program will, to the extent possible, not include or intend to perform any construction in floodplains. All actions to elevate structures in a particular neighborhood or local government located within a floodplain must prove cost reasonableness relative to other alternatives or strategies, such as demolition of substantially-damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to prevent loss of life and mitigate future property damage.

Proof of cost reasonableness for elevation actions will include an estimate of the average costs associated with elevating structures (updated as needed per market price, at minimum, once per annum) and provide a description of how it will document on a neighborhood or local government level that elevation, as opposed to alternative strategies, is cost reasonable to promote a community's long-term recovery.

- 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 UGLGs should review the UFAS accessibility checklist available at <https://www.hudexchange.info/resource/796/ufas-accessibility-checklist/> and the HUD

Deeming Notice, 79 FR 29671 (May 23, 2014) to ensure that these structures comply with accessibility requirements.

## **27. PROTECTION OF PEOPLE AND PROPERTY; CONSTRUCTION METHODS**

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

The State will ensure that UGLGs implementing construction activities ensure their construction methods emphasize high quality, durability, energy efficiency, sustainability, and mold resistance, including the implementation of Green Building Standard.

Green Building Standard must be met for all new construction of residential buildings and 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. Green Building Standard means that all new construction for residential buildings and all replacement of substantially damaged residential buildings meet an industry-recognized standard that has achieved certification under at least one of the following programs:

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

Missouri's Disaster Recovery Program will ensure at a minimum that all Construction complies with the HUD Section 8 Existing Housing Quality Standards (HQS). The primary objective of these standards is to protect the tenant(s) by guaranteeing a basic level of acceptable housing. The goal is to provide "decent, safe and sanitary" housing at an affordable cost to lower income families. Beyond these minimum standards, the program encourages housing of the same quality and amenities as market rate housing within the same market area.

For rehabilitation of nonsubstantially damaged residential buildings, the Green Building Checklist applies. The HUD CPD Green Building Retrofit Checklist, is available on the HUD website.



Subgrantees 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).

### **27.1. Beneficiary Right for Appeal**

Proposals developed by UGLGs must describe or reference locally adopted building codes, standards, and ordinances that apply to construction projects. 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, and must be identified in the proposal, as well as Procurement process for construction work completed. UGLGs are required to conduct inspections of construction progress as per local or State code, whichever is stricter.

Proposals must include a statement of Beneficiary rights to appeal on quality of construction work. UGLGs may adopt the policy described below, or develop or adopt a policy for appeals of their own.

Beneficiary Right to Appeal Quality of Construction Work:

The Beneficiary has the right to identify construction work that does not meet standards described by Action Plan, local or State Code, and has the right to appeal that work within the first 6 months of commencing residency. This appeal will be conducted through written notice to the UGLG's method of construction inspection. Inspection of identified deficiencies are required to occur within 10 business days of notification, with written response in Concurrence or Rejection of deficiency relative to Local or State Codes. Statement of Concurrence or Rejection will be provided within 30 business days of Inspection.

If Concurrence of deficiency is identified, UGLGUGLG will seek remedy with Contractor to repair identified deficiency.

Beneficiary must provide written notification of commencement of residency to UGLG through UGLG method of inspection within 10 business days of commencing residency on the property, or Beneficiary waives the Beneficiary Right of Appeal Quality of Construction Work. Beneficiaries who do not commence primary residency on the properties waive the Beneficiary Right of Appeal Quality of Construction Work.

## **28. INFRASTRUCTURE ACTIVITIES**

Missouri conducted a thorough unmet needs assessment. During this process Missouri conducted a comparison of the housing damage, economic impact damage, and infrastructure damage. Sixty-one Missouri counties received Presidential Declarations for public assistance. Additionally, Hazard Mitigation Grant Funding was also approved statewide. Moreover, there were 16 counties approved for Public Assistance in DR-4435 that were also included in DR-4451. Based upon the fact that almost 73% of the total unmet need was in housing, Missouri does not currently plan to commit CDBG-DR funds

from this grant for infrastructure projects that do not support housing recovery. In the future, Missouri will update the Unmet Needs Assessment, and should Missouri determine that all housing needs have been met, Missouri will amend its Action Plan to include non-housing supportive Infrastructure activities.

## **29. RESILIENCE TO NATURAL HAZARDS**

Missouri's DR-4451 disaster was a complex disaster that saw substantial damage across many counties over several months. Missouri saw high winds, hail, heavy rain, and flooding from March to July of 2019. In May of 2019, a tornado hit Carl Junction, Eldon, and the Jefferson City area. The separate flooding and tornado events impacted 61 counties. Twenty-six of the 61 counties were declared for FEMA Individual Assistance. HUD only designated 3 of those counties as most impacted and distressed (MID).

In addressing these most impacted and distressed counties, the MIDs will account for multiple long-term recovery mitigation efforts to preclude future disasters. Among these are ensuring compliance with the storm water management systems per 83 FR 5820 and all references to the HUD notice in the Federal Register, as well as past notices. These will include conducting local voluntary buyouts and establishing and maintaining construction standards which enhance long term recovery, mitigation, and enhance resiliency. While storm water management systems are critical components of any mitigation strategy, Missouri has limited funding available to resolve both immediate housing needs and upgrade storm water management systems with this specific grant allocation.

An UGLG may apply for Planning activities whose purpose is to identify stormwater management system improvements. Missouri will, to extent possible and available, provide relevant data to inform Planning activities and results.

## **30. DISASTER RECOVERY AND RESPONSE PLAN**

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 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 provide the detail for each of the Recovery Support Functions (RSF).

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

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

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 Development

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

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 group's 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.

### **31. LEVERAGING FUNDS**

The State of Missouri 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
- US Department of Agriculture- Rural Development
- US Department of Housing and Urban Development
- Department of Public Safety, State Emergency Management Agency, Hazard Mitigation Program
- Small Business Administration, Home Disaster Loan Program
- 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 for the use of the CDBG-DR funding is to continue the track record of leveraged investments. Although not likely, if the unmet housing need is exhausted, the CDBG-DR Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of economic revitalization and infrastructure.

## 32. CONSTRUCTION STANDARDS

### 32.1. Standards for Housing and Work performance

#### 32.1.1 Housing Programs

Program Design Standards emphasize high quality, durability, energy efficiency, sustainability and mold resistance. Sub-Recipients and/or Contractors will comply with minimum standards established by the program or local code ordinance, whichever is stricter. Minimum standards include compliance with HUD Housing Quality Standards (HQS). New housing construction, and reconstruction will meet or exceed compliance standards with one of the Green Standards outlined in the policies and procedures implementation manual. All construction will meet an industry-recognized standard such as those set by the FORTIFIED Home standards.

## 33. BASIS FOR ALLOCATION

Missouri’s Unmet Needs Assessment confirms the HUD analysis directing attention to three geographic areas. A thorough review of all available data sources confirms that housing is the greatest need and further confirms the geographic areas noted in the 27 January 2020 HUD notice in the Federal Register. Specifically, these are Holt, Cole, and St. Charles Counties. Given the amount of the grant at \$30,776,000, Missouri will focus all grant resources toward the three identified Most Impacted and Distressed Counties. Given the large numbers of Low- to Moderate-Income citizens in these counties, Missouri will commit all funding to those who are Low- to Moderate-Income or belong to other vulnerable populations. Given over \$108 Million dollars in unmet needs combined with 72.88% of the damage to housing, Missouri will only do housing activities in the three counties.

COUNTY	% ALLOCATED	\$ ALLOCATED
Cole	25%	\$ 7,059,300
Holt	20%	\$ 5,647,440
St. Charles	55%	\$15,530,460
<b>TOTAL</b>	100%	\$28,237,200

## 34. PRESIDENTIALLY DECLARED COUNTY

All activities in Missouri’s 2019 DR-4451 CDBG-DR Program will be executed in Presidentially- declared counties eligible for assistance. The Program will only execute activities in the areas HUD has designated in the MID (St. Charles County, zip code 64437 (Holt County), zip code 65101 (Cole County) as outlined in the January 27, 2020 Federal Register 85 FR 4683.

## **35. MITIGATION**

As previously stated, Missouri is prone to repeated flooding. All aspects of this Action Plan and the Missouri Long-Term Recovery strategy are in accordance with 83 FR 5851. The Local Voluntary Buyout activity is dedicated to mitigating future flooding of homes in the 500-year floodplain. The Construction of New Affordable Housing activity and the Down Payment Assistance for Home Ownership activity are designed to assist LMI and vulnerable population families to secure safe, sanitary and secure affordable housing outside of the floodplain. The Infrastructure to Support Housing Recovery Efforts and Affordable Housing activity is designed to allow UGLGs to implement projects that will mitigate disaster damage to housing in the future.

The Missouri Local Voluntary Buyout activity mitigates against future disasters by voluntarily moving citizens away from the repeated likelihood of future disasters. This program activity offers an incentive which will increase the likelihood of citizens accepting the program and decrease any possibility of homelessness or community economic hardship due to a local voluntary buyout.

## **36. USE OF URGENT NEED**

The State of Missouri anticipates spending the majority, if not all, of the disaster funding upon Low to Moderate (LMI) citizens and vulnerable population households. The Urgent Need National Objective will be used when serving non-LMI households.

## **37. FOR FUNDS AWARDED TO A STATE (MOD OR PROGRAMS/ACTIVITIES)**

Missouri's 2019 DR-4451 Disaster Recovery program will be implemented in the areas HUD has designated in the MID (St. Charles County, zip code 64437 (Holt County), zip code 65101 (Cole County) as outlined in the January 27, 2020 Federal Register 85 FR 4683.

For this program, mobile homes or manufactured housing units (MHUs) that are real property will be considered for Missouri's housing activities. These are mobile homes or MHUs that are titled with the land and owned by the same individual or household. Mobile homes or MHUs that are personal property, will not be eligible for Missouri's housing activities. These are mobile homes or MHUs that sit on land not owned by the owner of the home.

*\*An eligible use of activities, with the exception of state grant administration and state planning, is the utilization of CDBG-DR funds to serve as the local match.*

## **38. Requirements for All Activities**

### **38.1. National Objectives**

The primary goal of HUD's Community Development Block Grant- Disaster Recovery (CDBG-DR) program is to rebuild disaster affected areas and stimulate the recovery process principally for persons of Low and Moderate Income (LMI). HUD requires that activities implemented using CDBG-DR achieve one of HUD's National Objectives. Proposed activities may qualify for more than one national objective. The best National Objective to use, if the activity qualifies, is the Low to Moderate Income Benefit (LMI, LMA, LMB, LMHI). This is the preferred National Objective because of the HUD requirement for 70% of all CDBG-DR funding for the DR-4451 disaster to benefit LMI citizens. For the activities that meet more than one national objective, it may be useful to document compliance with all the applicable national

objectives, especially if there is some uncertainty regarding the ability of an activity to meet the chosen national objective upon completion. All proposed activities must achieve at least one of the following National Objectives.

**Low to Moderate Income Benefit (LMI):**

This National Objective is designed for activities that benefit LMI persons and assist in the development of viable urban communities principally for LMI persons. This is the primary HUD National Objective of the CDBG-DR Program. It is also the primary and preferred National Objective of the State of Missouri.

**Low to Moderate Income Area Benefit (LMA):**

This National Objective is used for activities that benefit all residents of a residential neighborhood where 51 percent of the residents are LMI persons.

**Low to Moderate Income Housing:**

This National Objective is used for activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households. Structures with one unit must be occupied by a LMI household. If the structure contains two units, at least one unit must be LMI occupied. Structures with three or more units must have at least 51 percent occupied by LMI households. For rental housing, occupancy by LMI households must be at affordable rents, consistent with standards adopted and publicized by the grantee.

**Low to Moderate Income Buyout (LMB):**

This National Objective is used for activities that provide a buyout award to acquire housing owned by a LMI household, where the award amount (including optional relocation assistance) is greater than the post-disaster (current) fair market value of that property.

**Low to Moderate Income Housing Incentive (LMHI):**

This National Objective is used with activities that are tied to the voluntary buyout or other voluntary acquisition of housing owned by a 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 will be occupied by an LMI household.

**Elimination and Prevention of Slum & Blight:**

This National Objective is used for activities that change the physical environment of a deteriorating area. Meeting this National Objective centers around determining the extent of and physical conditions that contribute to blight. Activities meeting this National Objective eliminate specific conditions of blight or physical decay on a spot basis or in a slum or blighted area. Activities under this National Objective are limited to acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities. Furthermore, rehabilitation is limited to the extent necessary to eliminate a specific condition detrimental to public health and safety.

**Urgent Need:**

This use of this National Objective is rare. It is designed only for activities that alleviate emergency conditions. Typically used in areas where 50% or less of the community is LMI. Urgent Need qualified activities must meet the following criteria: (1) The existing conditions

must pose a serious and immediate threat to the health or welfare of the community (2) The existing conditions are of recent origin or recently became urgent (generally, within the past 18 months) (3) The grantee is unable to finance the activity on its own; and (4) Other sources of funding are not available.

### **38.2 Consideration of Costs and Benefits**

DED will require subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects. This will be completed by encouraging subrecipients to perform a self-assessment of each proposed project and selecting the project(s) that provide(s) the greatest impact within the confines of the budgeted grant amount.

### **38.3 Consistency with Local Planning Efforts**

Applicants will be asked to provide evidence that the proposed project is consistent with local plans, such as Comprehensive Plans, Regional Plans, and or Hazard Mitigation Plans.



### 38.4 Activity Information

Activity	Maximum Award per beneficiary	Program Type	National Objectives
Planning	\$250,000 for each of the three MIDs located in Cole, Holt, and St. Charles Counties;  \$250,000 to State of Missouri	Planning	Presumed to meet a National Objective under the Entitlement Regulations
Housing Counseling (Public Service Activity)	Value not to exceed \$750 per beneficiary	Public Service	LMI
Acquisition and Demolition Only	Post-disaster appraised value of the home and land	Housing	Slum and Blight
Construction of New Affordable Housing For Homeownership (Single Family Housing)	Up to 25% of total construction costs, plus closing costs.	Housing	LMI, Urgent Need
Affordable Multifamily Rental Housing (New Construction or Repairs/Rehabilitation)	Up to \$5,000,000 per new construction Multifamily project.  Up to \$1,000,000 per rehabilitation on existing Multifamily complex.	Housing	LMI
Down Payment Assistance for Homeownership	Allows up to 100% of the down payment.	Housing	LMI, Urgent Need
Homeowner Rehabilitation	\$50,000 Maximum per housing unit	Housing	LMI, Urgent Need
Local Voluntary Buyout	Pre-event FMV of land and structure	Housing	LMA, LMB, LMHI, Urgent Need
Infrastructure to Support Housing Recovery Efforts and Affordable Housing	Maximum \$1,000,000 per MID	Housing	LMH, LMI, LMA, Urgent Need
Housing Incentive for Replacement Assistance	\$50,000 Maximum in addition to buyout	Housing	LMHI, LMI

### 38.4.1 Planning

Planning	
<i>Program Category</i>	Planning
<i>National Objective</i>	Planning is presumed to meet a National Objective under the Entitlement Regulations.
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Budget</i>	\$1,000,000
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	Planning
<i>Eligible Costs</i>	<p>Eligible Planning Costs may include, but may not be limited to:</p> <ul style="list-style-type: none"> <li>• Planning only activities.</li> <li>• Planning activities such as data gathering, studies, analyses, preparation of plans, and identification of actions that will implement such plans. Activities designed to improve the UGLG’s capacity to plan and manage programs and activities.</li> <li>• Eligible Planning activities may include any unmet needs in the reconstruction, rehabilitation, or replacement of shelters for homeless or vulnerable populations.</li> </ul>
<i>Maximum Distribution</i>	\$250,000.00
<i>Administrating Entity</i>	Unit of General Local Government, may designate a Regional Planning Commission or Council of Governments as subrecipient

### 38.4.2 Housing Counseling (Public Services Activity)

Housing Counseling	
<i>Program Category</i>	Public Services
<i>National Objective</i>	<ul style="list-style-type: none"> <li>LMI Benefit- if household receiving counseling is less than 80% AMI category for income</li> <li>Urgent Need- if household receiving counseling is in the 80%-120% AMI category for income</li> </ul>
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	Public Services
<i>Eligible Costs</i>	Eligible Activity Costs: <ul style="list-style-type: none"> <li>Housing Counseling provided on DR-4451 CDBG-DR funded housing-related activities.</li> </ul>
<i>Responsible Entity to Implement Activity</i>	Unit of Local Government will carry out this service through public services activity.

**Program Summary:** This activity is designed to provide counseling to LMI, and vulnerable population households impacted by the DR-4451 disaster seeking to participate in a housing activity that is a part of the MID’s CDBG-DR funded program. This activity assists households seeking information on homeownership, affordable multifamily rental housing, and down payment assistance. Counseling is provided by HUD-approved housing counseling agencies.

### 38.4.3 Acquisition for Demolition Only

Acquisition for Demolition Only	
<i>Program Category</i>	Housing
<i>National Objective</i>	Elimination & Prevention of Slum and Blight
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	<ul style="list-style-type: none"> <li>• Acquisition- General: Residential properties are defined as owner-occupied or non-owner occupied homes. The purchase of the property is a payment made to the homeowner based upon the “post-disaster” appraised value of the home and land.</li> <li>• Clearance and Demolition</li> </ul>
<i>Eligible Costs</i>	<p>Eligible Activity Costs may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Environmental reviews</li> <li>• Associated Activity Delivery Costs</li> <li>• Acquisition costs</li> <li>• Demolition &amp; Clearance costs</li> <li>• Relocation assistance</li> </ul>
<i>Entity Responsible to Implement the Activity</i>	Unit of General Local Government will implement and deliver the activity.

**Program Summary:** This program is designed to provide funding for units of local government to utilize CDBG-DR funding to demolish abandoned and dilapidated properties with the goal of reducing slum and blight conditions as a result of disaster related damage. Residential properties are defined as owner-occupied or non-owner occupied homes.

**Specific Regulatory Requirements:** Acquisition, and Clearance and Demolition activities are subject to the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (“URA”) and section 104(d) of the HCD Act. However, the one-for-one replacement requirements are waived in connection with lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation. While one-for-one-replacement requirements generally apply to demolish or convert occupied and vacant lower-income dwellings, disaster-damaged units that are not suitable for rehabilitation are exempted from the one-for-one replacement requirements.

The relocation assistance requirements of 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 in order to assure uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance (see 83 FR 5844).

**Additional Activity Requirements:**

- The acquired property must meet a National Objective for a 5-year period. Should the property be utilized for another purpose, prior to the end of the 5-year period, than for which it was acquired, the new purpose must be reviewed by DED, the administering agency, to determine whether a National Objective will be met by the new use. (HUD CPD-17-09 notice)
- Note: use of this activity may be utilized for the Construction of New Affordable Housing (for Homeownership) or Affordable Multifamily Rental Housing, however the end use of the activity will be Affordable Housing.

**38.4.4 New Construction of Affordable Housing for Homeownership**

<b>Construction of New Affordable Housing (For Purchase)</b>	
<i>Program Category</i>	Housing
<i>National Objective</i>	LMH: - Activities undertaken to provide or improve permanent residential structures that will be occupied by low-to-moderate income households. Urgent Need- Activity undertaken to provide or improve permanent residential structures for homeownership purposes that will be occupied by households with total household income that is between 81-120% AMI.
<i>Nm-Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	<ul style="list-style-type: none"> <li>• Construction of New Housing (for Homeownership)</li> </ul>
<i>Eligible Costs</i>	Eligible Activity Costs may include, but are not limited to: <ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Environmental reviews</li> <li>• Clearance and Demolition</li> <li>• Construction Costs</li> <li>• Associated Activity Delivery Costs</li> </ul>
<i>Entity Responsible for Implementation</i>	Unit of General Local Government (UGLG) in partnership with Non-profit developers, and or Community Housing Organizations

**Program Summary:** This activity provides assistance to disaster impacted communities through the construction of new affordable housing. The Program will provide funding for new construction in the event the UGLG partners with community housing organizations and non-profit developers. New construction is not allowed in a floodplain.

HUD Income Limits per County

AMI %	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
<b>COLE COUNTY</b>								
30%	\$15,900	\$18,150	\$21,720	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
50%	\$26,450	\$30,200	\$34,000	\$37,750	\$40,800	\$43,800	\$46,850	\$49,850
80%	\$42,300	\$48,350	\$54,400	\$60,400	\$65,250	\$70,100	\$74,900	\$79,750
<b>HOLT COUNTY</b>								
30%	\$12,760	\$17,240	\$21,720	\$26,200	\$30,680	\$34,650	\$37,050	\$39,450
50%	\$20,900	\$23,900	\$26,900	\$29,850	\$32,250	\$34,650	\$37,050	\$39,450
80%	\$33,450	\$38,200	\$43,000	\$47,750	\$51,600	\$55,400	\$59,250	\$63,050
<b>ST CHARLES COUNTY</b>								
30%	\$17,400	\$19,900	\$22,400	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
50%	\$29,050	\$33,200	\$37,350	\$41,450	\$44,800	\$48,100	\$51,400	\$54,750
80%	\$46,450	\$53,050	\$59,700	\$66,300	\$71,650	\$76,950	\$82,250	\$87,550

Based on HUD FY 2020 Income Limits

**Specific Regulatory Requirements:**

The National Objective must be maintained during the affordability period required for the property.

Newly constructed affordable single-family housing for homeownership must maintain a minimum five year affordability period.

All new construction must be tied to a disaster related impact and must be located in a DR-4451 disaster-impacted area.

All new construction must be built outside of the floodplain.

Non-profit developers must have site control (ownership or lease in some cases) and must plan, obtain permits, and manage the project from start to finish, not just serve as contractors. Note that negotiations regarding fees and process between the UGLG and developers must be solidified in a developer agreement.

**Green Building Standards**

All new construction that utilizes any level of CDBG-DR funding is subject to utilizing green building standards. The State CDBG-DR policy includes further explanation on these requirements.

**Resiliency**

All reconstruction, and new construction should be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigating the impact of future disasters.

In addition, DED strongly encourages the use of the Resilient Home Construction Standard.

### 38.4.5 Affordable Multifamily Rental Housing

This activity is designed to rehab existing affordable housing developments that suffered damage during the disaster event, or construct an Affordable Multifamily Housing complex to replace affordable housing stock lost due to disaster damage. Affordable Multifamily Rental Housing may be delivered through rehabilitation of existing units or construction of new units. The activity may leverage Low Income Housing Tax Credits administered by the Missouri Housing Development Commission, or may utilize other state or federal funding, or other sources of private and volunteer resources managed by non-profits. The applicable regulatory compliance, and the State’s CDBG-DR Program Policy included in this section are applicable to both options for utilization of the Affordable Multifamily Rental Housing. The Program’s Implementation Manual includes further applicability of regulatory compliance and policy for the State’s CDBG-DR Affordable Multifamily Rental Housing Program policy.

The two options to utilize funding for this activity are as follows:

#### 38.4.5.1 Affordable Multifamily Rental Housing Option without LIHTC

<b>Affordable Multifamily Rental Housing Option without LIHTC</b>	
<i>Program Category</i>	Housing
<i>National Objective</i>	LMH: Activities undertaken to provide or improve permanent residential structures that will be occupied by low-to-moderate income households
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	Affordable Multifamily Rental Housing (rehabilitation or new construction)
<i>Eligible Costs</i>	Eligible Activity Costs may include, but are not limited to: <ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Clearance and Demolition</li> <li>• Construction</li> <li>• Repair, rehabilitation, or restoration of affordable rental units</li> <li>• Environmental reviews</li> <li>• Activity Delivery Costs</li> </ul>
<i>Responsible Entity to Implement Activity</i>	Unit of General Local Government

### 38.4.5.2 Affordable Multifamily Housing leveraged with LIHTC

This activity option will leverage Low Income Housing Tax Credits, managed by the Missouri Housing Development Commission (MHDC), for the construction of an Affordable Multifamily Housing complex project.

Applicants interested in leveraging LIHTC equity with this funding source should refer to the MHDC Developer’s Guide and DED for more information regarding the CDBG-DR program. The developer entity (development team consisting of non-profit if applicable) making application to MHDC must obtain a Letter of Intent from the Missouri Department of Economic Development (DED) and include this letter with their application submission.

Affordable Multifamily Housing leveraged with LIHTC	
<i>Program Category</i>	Housing
<i>National Objective</i>	LMH: Activities undertaken to provide or improve permanent residential structures that will be occupied by low-to-moderate income households
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of an application submitted by the developer in response to the Missouri Housing Development Commission’s Qualified Allocation Plan. The application will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	August 2021
<i>Projected End Date</i>	August 2023
<i>Eligible CDBG-DR Activities</i>	<ul style="list-style-type: none"> <li>Affordable Multifamily Rental Housing</li> </ul>
<i>Eligible Costs</i>	Eligible Activity Costs may include, but are not limited to: <ul style="list-style-type: none"> <li>Acquisition</li> <li>Construction costs</li> <li>Developer Fee</li> <li>Environmental review</li> <li>Clearance</li> <li>Demolition</li> </ul>
<i>Entity Responsible for Administration and Implementation</i>	Missouri Department of Economic Development CDBG Program

#### Program policy applicable to both options for utilizing CDBG-DR funds for Affordable Multifamily Rental Housing

**Program Summary:** Specifically, this activity entails repair or restoration, or new construction of affordable multifamily rental housing units in the counties of Cole, Holt and St. Charles to applicable construction codes and standards.



**Specific Regulatory Requirements:**

Affordable multifamily rental housing must be rented to a LMI person at affordable rents. Please refer to HUD’s Website for affordable rents in each county.

When providing funds for the rehabilitation or construction of rental properties, each activity must meet the national objective of Low to Moderate Housing Benefit in order to count towards meeting the overall benefit requirement. This means that:

- At least 51 percent of the units in an assisted property must be occupied by persons or households whose incomes are equal to, or less than, 80 percent AMI.
- In a one-unit project, the unit must be made available to an LMI tenant.
- In a two-unit project, one unit must be made available to an LMI tenant.
- In projects where there are three or more units, 51 percent of the assisted units (rounded up to the nearest whole number) must be made available to an LMI tenant (e.g., in a four-unit project, three units must be made available to LMI tenants).

Project is defined as the total number of proposed units for new construction in a single undertaking.

Scattered site projects accomplished as a single undertaking shall take into consideration the individual properties when determining national objective compliance (e.g., a seven single-unit project on seven different sites shall all be occupied by an LMI tenant).

Mixed-income projects with affordable multifamily rental housing should follow a proportional funding method to determine how many units should be reserved as affordable based on the amount of CDBG-DR grant or loan funds committed. The proportion of units in the project that must be occupied by households whose incomes are at or below 80 percent of Area Median Income (AMI) may be set equal to the proportion of the total cost of the project as subsidized by CDBG-DR funds.

For example, if a proposed mixed-income project has a total development cost of \$1,000,000 and a development gap of \$100,000 to be funded by CDBG-DR, then one tenth of the units should be affordable at 80 percent AMI or below. The range of affordability and unit mix are subject to project needs and grantee policies that can be more restrictive.

Not Suitable for Rehabilitation

DED will create policies and procedures to assess the effectiveness of each proposed project whose goal is to assist a rental property rehabilitation. These policies and procedures will include criteria that determine whether the rehabilitation of the unit will be cost-effective relative to other means of providing assistance for affordable multifamily rental housing needs.

Affordability Period Monitoring Requirements

Rehabilitation or Reconstruction of multifamily rental projects with 8 or more units	Newly constructed affordable small rental (4 units or less) units	Newly constructed affordable Multifamily (5 units or more) housing complex projects
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Minimum 15 years	Minimum 15 years	Minimum 20 years
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### Green Building Standards

CDBG-DR funding of all new construction of residential buildings, replacement of substantially damaged residential building, and rehabilitation of nonsubstantially damaged residential buildings is subject to utilizing green building standards. All substantial rehabilitation must follow guidelines in the HUD CPD (Community Planning and Development) Retrofit Checklist, found on the HUD website. Please refer to 83 FR 5861 for further details.

### Broadband Infrastructure Requirements

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.

### Resiliency

All reconstruction, and new construction should be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigating the impact of future disasters.

In addition, DED strongly encourages the use of the Resilient Home Construction Standard.

### 38.4.6 Homeownership Assistance – Down Payment Assistance

Down-Payment Assistance for Home Ownership	
<i>Program Category</i>	Housing
<i>National Objective</i>	<ul style="list-style-type: none"> <li>• LMI Benefit- if the household being assisted has an income below 80% AMI</li> <li>• Urgent Need- if the household being assisted has an income of 80-120% AMI</li> </ul>
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	Homeownership Assistance for low-and-moderate income Homeownership Assistance (waiver only)
<i>Eligible Costs</i>	Eligible Activity Costs: <ul style="list-style-type: none"> <li>• Down payment Assistance</li> <li>• Housing Counseling is allocated to public services activities</li> </ul>
<i>Administrating Entity</i>	Unit of General Local Government (UGLG) utilizing partnership with mortgage lenders.

**Program Summary:** This activity is designed to assist primarily LMI households purchase affordable housing in a non-flood plain region by providing up to 100% of the down payment required by the mortgage lender on behalf of the purchaser for a new home. Units of General Local Government may establish the amount of down payment assistance to be provided, allowing for consistency with current Entitlement Program Down -Payment Assistance programs.

**Specific Regulatory Requirements:**

The amount eligible for down payment assistance is provided within the federal register provisions for the qualifying disaster event. (83 FR 5844 VI B.32). The regulations guiding this Action Plan allow for assistance to provide up to 100% of the down payment, opposed to the 50% provided with regular CDBG program funds.

**Program Policy:**

The UGLG may impose a purchase price moratorium in line with a current Down Payment Assistance Program.

The program will pay closing costs incurred by the prospective homeowner; the program will not reimburse on behalf of the seller.

The Applicant household will meet with a HUD approved homeownership counselor for financial counseling and show completion to the UGLG or non-profit partner before moving forward with application.

For program and Federal Register purposes, counseling meets the minimum requirement; note however, that the UGLG may enforce stricter policy in that completion of an online course may be a requirement in addition to counseling.

HUD approved homeownership counseling contacts:

\*Note that this list is not all-inclusive, and contacts can be found on HUD's website:

<https://apps.hud.gov/offices/hsg/sfh/hcc/hcs.cfm?webListAction=search&searchstate=MO>

[In an effort to ensure the purchased homes meet the minimum qualifications for HUD:](#)

- Document that a termite and home inspection is completed.
- Homes must comply with HUD's standard of being decent, safe, and sanitary.

UGLG will receive and coordinate applications for down payment assistance between prospective homeowner and mortgage lender; applicant's total household income must be under 120% of the AMI; applicants with a total household income at and below 80% of the AMI receive priority.

### 38.4.7 Homeowner Rehabilitation and Reconstruction Program

Homeowner Rehabilitation and Reconstruction Program	
<i>Program Category</i>	Housing
<i>National Objective</i>	<ul style="list-style-type: none"> <li>• LMH Benefit</li> <li>• Urgent Need (since this activity ties in affordable housing, this national objective is only used to cover above 80% and below 120% of income eligible households participate in this program. Total household income cannot exceed 120% of the AMI (Area Median Income)</li> </ul>
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	Rehabilitation/Reconstruction of Residential Structures
<i>Eligible Costs</i>	Eligible Activities and Activity Costs: <ul style="list-style-type: none"> <li>• Repair/Rehabilitation of single-family owner-occupied homes</li> <li>• Environmental Review</li> <li>• Associated Activity Delivery Costs</li> </ul>
<i>Responsible Entity to Implement Activity</i>	Unit of General Local Government

**Program Summary:** The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. This activity is designed to restore owner-occupied housing to applicable construction codes and standards.

Grantees must comply with minimum standards established by the program or local code ordinance, whichever is stricter).

**Specific Regulatory Requirements:**

All rehabilitation activities must meet the following criteria (see 83 FR 5844 and U.S.C. 42 5305(a)(4)):

- Cost Feasibility Analysis will assess the effectiveness of each proposed household rehabilitation. The amount of assistance per housing unit may not exceed \$50,000; in addition, the cost to rehabilitate the unit may not exceed 75% of the cost to reconstruct or replace the unit. The analysis will be conducted, and policy criteria applied, to determine whether the rehabilitation or reconstruction of the unit will be cost-effective to other means of assisting the property owner such as acquisition of the property. Additionally, as appropriate, other housing

alternatives that are more cost-effective, such as manufactured housing options, are to be considered. The UGLG , on a case-by-case basis, may consider exceptions to these comparison criteria that describe the process used to analyze the circumstances under which an exception is necessary;

- Total household income cannot exceed the less of the 120% AMI (area median income)
- All owner-occupied units will meet local or State code for construction standard of quality, whichever is stricter.
- Additionally, all new construction of residential buildings, replacement of substantially damaged residential building, and rehabilitation of nonsubstantially damaged residential buildings must achieve compliance with the HUD CPD Green Building Retrofit Checklist; please refer to HUD website for CPD GBR Checklist.

The UGLG, on a case-by-case basis, may consider exceptions to these comparison criteria that describe:

The process used to analyze the circumstances under which an exception is necessary;

- How reasonable accommodations were made to provide accessibility for an occupant with a disability; and
- How the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart E—Cost Principles.

Exception Policy will apply to Accessibility improvements. Exception costs for Accessibility improvements may include activities such as installation or repair of ramps, handrails and grab bars, replacement of bathtubs with wheel-in showers, lowering of items such as sinks, electrical switches, and cupboards, widening doorways, repair of existing attached garages when incidental to other code required work or to achieve reasonable accommodation of a disabled person, and provision of bathroom or bedroom space on the first floor level of the dwelling.

Exceptions must be submitted to UGLGs as an Addendum to original project plan, and must include sourcing method, cost reasonableness rationale, and sourced product descriptions including term (time period length) any available manufacturer warranty on any sourced (not direct construction) Accessibility product. UGLG reserves the right to appeal sourced product choices on a cost reasonableness basis. UGLG may apply for a budget amendment to accommodate Exceptions if necessary. Missouri reserves the right to deny such application if Fund balance is unavailable.

In addition, this program strongly encourages the use of the Resilient Home Construction Standard. All rehabilitation and reconstruction should be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigating the impact of future disasters.

Program Design Standards emphasize high quality, durability, energy efficiency, sustainability and mold resistance. Grantees are 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.

## Program Requirements

- 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 UGLs should review the UFAS accessibility checklist available at <https://www.hudexchange.info/resource/796/ufas-accessibility-checklist/> and the HUD Deeming Notice, 79 FR 29671 (May 23, 2014) to ensure that these structures comply with accessibility requirements.

All actions to elevate structures in a particular neighborhood or local government located within a floodplain must prove cost reasonableness relative to other alternatives or strategies, such as demolition of substantially-damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to prevent loss of life and mitigate future property damage. Proof of cost reasonableness for elevation actions will include an estimate of the average costs associated with elevating structures (updated as needed per market price, at minimum, once per annum) and provide a description of how it will document on a neighborhood or local government level that elevation, as opposed to alternative strategies, is cost reasonable to promote a community's long-term recovery.

- Property cannot be a second home to be defined as a non-primary residence of owner or tenant.
- A control measure will be put in place to prevent the resale of rehabilitated or reconstructed homes solely for profit, which can be found in the policies and procedures.

### 38.4.8 Local Voluntary Buyout Program

Local Voluntary Buyout Program	
<i>Program Category</i>	Housing
<i>National Objective</i>	<ul style="list-style-type: none"> <li>• LMA – Low/Mod Area Benefit: area population of the targeted buyout area is 51% low-and-moderate income. UGLGs document beneficiaries for Area Benefit Activities by either: (1) U.S. Census data by Census Tract, Block Group or Place; or (2) survey data.</li> <li>• LMI Benefit- used if the household being bought out is below the 80% AMI income category</li> <li>• LMB – Low/Mod Buyout- only used if household being bought out is in the 51% LMI category for income. used for activities that provide a buyout award to purchase property owned by LMI households where the award amount (including optional relocation assistance) is greater than the post-disaster (current) fair market value of that property.</li> <li>• LMHI – Low/Mod Housing Incentive-</li> <li>• Urgent Need- only used if household being bought out is in the 80%-120% AMI category for income</li> </ul>
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	Acquisition
<i>Eligible Costs</i>	<p>Eligible Activity Costs:</p> <ul style="list-style-type: none"> <li>• The local voluntary Buyout of residential properties in the 500-year floodplain. Residential properties are defined as owner-occupied homes siting on land owned by the same homeowner.</li> <li>• The purchase of the property is a payment made to the homeowner based upon the “pre-disaster” appraised value of the home and land.</li> <li>• Acquisition of the property, &amp; associated costs</li> <li>• Environmental review</li> <li>• Clearance</li> <li>• Demolition</li> <li>• Incentive payment to encourage resettlement outside of floodplain</li> </ul>
<i>Administrating Entity</i>	Unit of General Local Government



**Program Summary:** This activity is designed to allow citizens living in the floodplain to voluntarily have their homes bought from them so the property can be demolished and returned to a use that is compatible with open space, recreational, or floodplain and wetlands management practices in perpetuity. Households cannot relocate to a residence in the floodplain.

Grantees receiving CDBG–DR funds under this notice may establish optional relocation policies or permit their subrecipients 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.

CDBG-DR Buyout Program: Subrecipients may fund 100% of the buyout with CDBG-DR funds. This is a voluntary real property acquisition program with awards that are limited to the pre-event FVM of the land and structure.

To encourage households to relocate outside of the floodplain, subrecipients may offer a Housing Incentive for Replacement Assistance 122 awarding up to \$50,000 in addition to the pre-event FMV of the buyout home for buyout applicants. The housing incentive is utilized as down-payment assistance for replacement housing. The housing incentive may not be utilized as compensation, and program policy will address awarding undue enrichment.

Housing incentives awarded for replacement assistance are subject to the Robert T. Stafford Act, requiring that these funds be considered duplication of benefits. Additionally, applicants may only qualify for this additional assistance if they relocate outside of the floodplain to a lower-risk area. Subrecipients must maintain documentation describing how the amount of assistance was determined to be necessary and reasonable.

### 38.4.9 Infrastructure in support of or contributing to housing

Infrastructure in support of or contributing to housing	
<i>Program Category</i>	Infrastructure in support of or contributing to housing
<i>National Objective</i>	<ul style="list-style-type: none"> <li>• LMI Benefit- if the activity benefits a single household that is less than 80% AMI</li> <li>• LMI Area Benefit- if the activity benefits an area (multiple households) that is made up of 51% or more LMI households</li> <li>• Urgent Need- if the activity benefits an area (multiple households) that is made up of 50% or less LMI households</li> </ul>
<i>Projected Accomplishments</i>	The State is delivering this activity through Method of Distribution of a proposal submitted by the MID. The proposal will indicate the projected accomplishments. These projected accomplishments will be entered into DRGR upon entering the activity data. All future amendments to this Action Plan will include projected and actual accomplishments.
<i>Projected Start Date</i>	June 2021
<i>Projected End Date</i>	June 2024
<i>Eligible CDBG-DR Activities</i>	<ul style="list-style-type: none"> <li>• Additional Activity Requirements</li> <li>• CDBG-DR funding cannot be used for the maintenance of current or future infrastructure projects.</li> <li>• Project must be linked to housing recovery and restoration</li> <li>• The use of CDBG-DR funds in conjunction with any other type of funding makes the other funding subject to all the Federal and HUD regulations and requirements.</li> </ul>
<i>Eligible Costs</i>	Eligible Activity Costs may include, but are not limited to: <ul style="list-style-type: none"> <li>• Construction costs</li> <li>• Environmental review</li> <li>• Activity delivery costs</li> </ul>
<i>Responsible Entity for Implementing Activity</i>	Unit of General Local Government

**Program Summary:** This activity is to fund infrastructure projects that are linked to housing recovery and restoration. The needs assessment confirms a significant unmet housing need but also confirms an infrastructure unmet need. Undertaking activities such that provide mitigation concerning water/sewer/stormwater, streets, and bridges, and drainage systems directly improves the quality of life for all residents and provides a foundation that enables housing recovery in impacted areas. For example, completing a stormwater infrastructure project can alleviate flooding in residential areas.

#### Impacts of Activities on Members of Protected Classes and Vulnerable Populations:

With the submission of CDBG-DR Infrastructure Applications, Missouri will require the UGLG to consider and document the impacts of the proposed infrastructure activities and how they may affect members of protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas, as well as concentrated areas of poverty, and vulnerable communities. DED will take into account the

proposed project’s effect on protected classes when evaluating the proposal. DED will provide technical assistance for the UGLG to achieve this goal to the best of its ability.

UGLGs are required to submit maps with the proposal that show the location of the target area, the housing facility deficiencies, low to moderate income concentrations, and minority concentrations at a block group level. Additionally, applicants are required to describe the jurisdiction’s overall community development needs, the alternative target areas considered within the jurisdiction, and the rationale for the target area selected. UGLGs must demonstrate to DED that a thorough review has been conducted at the local level that assesses areas of greatest need throughout the jurisdiction.

### **38.5 Activity Information**

#### **38.5.1 Activity Projected Uses, Administering Entity, Budget, and Area**

Administering Entity: Missouri’s Department of Economic Development’s Business Community Solutions Division will be the administering entity for the execution of the 2019 DR-4451 CDBG-DR program.

Budget Uses: Missouri’s 2019 DR-4451 CDBG-DR program will follow the guidelines below:

<b>COST</b>	<b>PERCENTAGE</b>	<b>\$ BUDGETED</b>
Total Funding	100%	\$30,776,000
Administration Costs	5%	\$ 1,538,800
Planning Costs	3%	\$ 1,000,000
Public Services Activities		
*Housing and Infrastructure supporting housing recovery		\$28,237,200

\*The Method of Distribution for project activities is centric to the MID areas determining activity budgets for activities to be undertaken.

Geographic Area: Missouri will execute its 2019 DR-4551 CDBG-DR program in the three counties designated in the January 27, 2020 Federal Register as “Most Impacted and Distressed” (MID). The State of Missouri’s program will primarily serve citizens who are Low- to Moderate-Income (LMI) or belong to other vulnerable populations.

#### **38.5.2 Activity Eligible Activities and National Objectives**

Missouri’s 2019 DR-4451 CDBG-DR program will plan, implement, and execute activities that are CDBG-DR eligible and allowable. Missouri’s activities are targeted to primarily assist LMI citizens and vulnerable populations.

#### **38.5.3 Ineligible Activities**

Missouri will not limit any eligible activity beyond what is specifically excluded by HUD to allow for maximum flexibility.

Missouri will not conduct any ineligible activities, nor would they approve any UGLG, Contractor, Sub-Recipient, or Developer to conduct ineligible activities as identified in the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018; including: 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, 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 buyouts.

All of Missouri's 2019 CDBG-DR program activities are authorized under Title I of the Housing and Community Development Act of 1974 or allowed by waiver or alternative requirement published in the Federal Register.

## **38.6 Applicant Proposal Requirements**

### **38.6.1 Proposal Overview**

The State of Missouri's Department of Economic Development (DED) will conduct a proposal process to award the designated allocations to the Most Impacted and Distressed (MID) areas identified in the 2019 Community Development Block Grant- Disaster Recovery (CDBG-DR) Action Plan. A lead applicant from each of the three HUD-identified MID counties will apply on behalf of the entire MID county. The lead applicant, a Unit of General Local Government (UGLG), is chosen by a collaborative effort undertaken by impacted jurisdictions within the MID County. The lead UGLG will build and submit the proposal for the use of disaster recovery funding allocated to the MID County in this Action Plan. A proposal identifying activities put forth in this Action Plan that best addresses the unmet needs for this collaborative effort, is due to the DED on or before May 1, 2021. The proposal must be set within the fiscal boundaries of the budget put forth in this Action Plan and explain the activities that the lead UGLG will implement. While DED will provide the necessary policies for the program activities, the lead UGLG will be responsible for delivery of the activities. In lieu of receiving funds for grant administration, the lead UGLG and subrecipients will be reimbursed for project activity delivery costs. DED will serve as the approval authority for the proposal process. Maximum funding thresholds per MID and per Activity are identified in section 29.1 of this Action Plan. Factors in the development of these thresholds included Unmet needs identified in Section 8 of this Action Plan, including such elements of FEMA IA ineligibility (Table 30, p.73-74), homelessness (p.99) LMI status (p.64-65), and population.

### **38.6.2 Applicable Regulations**

The lead MID UGLG must abide by the Missouri CDBG-DR Program policy. The lead UGLG must also familiarize themselves with all relevant federal laws and regulations concerning the use of CDBG-DR funds, as established by the Federal Register Notices (February 9, 2018; August 14, 2018; February 19, 2019; June 20, 2019; and January 27, 2020) and including but not limited to the following:

- 42 U.S.C. 2000d-1 is clear that a CDBG-DR program cannot deny services and will not discriminate based upon race, color, or national origin. Additionally, 24 CFR 570.602 further expands to include discrimination based on age or sex. CDBG-DR programs must be inclusive and transparent in determining eligibility.
- 24 CFR 570.611 is designed to ensure a fair procurement process. This provision is critical given the sheer amount and dollar values associated in a disaster recovery and specifically with CDBG-DR programs.

- 24 CFR 570.504, 24 CFR 570.489(e), and 2 CFR 200.307 are the heart of any CDBG-DR program and cover Housing and Urban Development Community Development Block Grants, program administrative requirements and program income regulations and requirements.
- 2 CFR 200.310 to 200.316 address all aspects of federal financial management to include requirements and responsibilities. In essence, these are the federal requirements which ensure the fiscal stability of a program along with the performance and cost sharing requirements which are critical to CDBG-DR programs. Additionally, 2 CFR 200.310 is the governing requirement associated with insurance requirements covering federal programs.
- 24 CFR part 135 is Section 3 of the HUD Act. This section is paramount for all CDBG-DR programs and is the federal law covering economic opportunities for low and very low-income persons. This inspectable area is critical for CDBG-DR programs and includes Subpart D which is the complaint process as well as Subpart E on reporting and record keeping.
- The Fair Labor Standards Act as expressed in 29 USC 200.201 includes the definitions and administrative policy associated with fair labor standards. It includes provisions for both minimum wages as well as maximum hours.
- HUD Environmental Regulation 24 CFR 50, 24 CFR 51, 24 CFR 55 and 24 CFR 58,
- Fair Housing and Civil Rights Laws including Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 (the “Fair Housing Act”), Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973
- 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, including CDBG-DR funds, take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons).
- Titles II and III of the Americans with Disabilities Act of 1990, and the Age Discrimination Act of 1975. HUD Title VI.
- Title 49 CFR Part 24 Uniform Relocation Act, the Uniform Relocation Assistance and real property Acquisition Policies Act of 1970 in particular Subparts B and C.
- Davis-Bacon Act and Davis-Bacon Related Act.
- Section 3

### **38.6.3 Other Proposal Requirements**

The lead MID UGLG will submit a proposal containing details of the program activities to be implemented. Sufficient detail is needed for the State to approve the proposal.

The State will use three commonly accepted definitions in judging proposals.

- *Cost Reasonableness*: Reasonable cost are those costs which are consistent with what a reasonable person would pay in the same or similar circumstances for the same or similar good or service.
- *Feasibility*: Feasibility is designed to reveal whether the plan is feasible. It is an assessment of the practicality of the proposal and a determination if the applicant can accomplish the goals stated in the proposal.
- *Acceptable*: Acceptable is defined as the ability of the applicant’s proposal to accomplish the intent of this Action Plan with a positive and timely impact upon vulnerable and LMI populations.

### **38.6.4 Proposal Evaluation Criteria**

The lead MID UGLG applicant must submit a proposal which meets or exceeds the below listed criteria and demonstrates the MID's ability to complete the activity within the prescribed timeframe. At the request of the lead MID UGLG, DED will provide technical assistance for proposal development.

Guidelines and requirements that must be addressed for each proposed activity:

#### Baseline Compliance & Communication Requirements

##### 1. (Maximum 5 points)

Describe how all proposed activities will comply with all federal and state environmental laws, specifically those applicable to CDBG-DR grant funding.

- Specifically address how necessary Environmental Review(s) will be conducted. Describe all actions taken thus far to address the Environmental Review process.

##### 2. (Maximum 10 points)

Explain how funding the activity will prioritize and address LMI households and vulnerable populations:

- Provide sufficient data to prove that 70% or more of the funding will benefit LMI households.

##### 3. (Maximum 5 points)

Demonstrate in the proposal, the actions and process used to determine eligible beneficiaries. The eligibility determination process is outlined in DED CDBG-DR Policy and Procedures.

##### 4. (Maximum 5 points)

Address how Duplication of Benefits (DOB) will be prevented and layout how DOB checks and screening will be performed.

##### 5. (Maximum 5 points)

Explain public outreach plan/strategy.

6. (Maximum 5 points)

Include a Language Accessibility Plan to demonstrate how the applicant will reduce language barriers that preclude meaningful access by Limited English proficiency (LEP) person, including:

- How accommodation will be made for citizens with limited English proficiency.
- Making all documentation available to the public in the appropriate language of the individual accessing it and ensuring the applicant's website is Section 508 compliant.

7. (Maximum 5 points)

Show how the activity includes resiliency measures to preclude the spending of federal money on the same area over again.

Baseline Required Content for Implementation

8. (Maximum 20 points)

Explain the implementation strategy, including Feasibility and Acceptability for delivery in areas of:

- Show how the proposed activity addresses the substantiated unmet need directly connected to the DR-4451 disaster.
- Explain how the activity meets a HUD National Objective.
- Show how compliance will be met in accordance with the Green Building Standards for housing construction projects.
- Identify parties that will implement the activity.
- Describe what the activity produce for the community, i.e.
  - The number of households that will be serviced.
  - The general location of households being served.
- Provide timeline of activities for assurance that activities will end in the allotted amount of time.
  - Projected activity start date.
  - Projected activity end date.

9. (Maximum 10 points)

Address how housing activities will meet the special needs of persons who require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents, as identified in 24 CFR 91.315(e).

- Describe, and seek to resolve if applicable, any loss of private market units receiving project-based assistance, or with tenants that participate in the Section 8 Housing Choice Voucher Program, or the loss of any other housing units otherwise assisted under a HUD program.

- Describe, and seek to resolve if applicable, unmet needs for supportive housing for otherwise vulnerable populations, such as housing for the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents.

10. (Maximum 10 points)

Address how homelessness will be prevented resulting from its program and activities.

- Describe, and seek to resolve if applicable, any unmet needs for transitional housing, permanent supportive housing, and permanent housing needs for individuals and families that are homeless and at-risk of homelessness.
- Eligible Planning activities may include any unmet needs in the reconstruction, rehabilitation, or replacement of shelters for homeless or vulnerable populations.

11. (Maximum 10 points)

Explain the timeline and milestones for successfully accomplishing the activity, with sufficient detail to show how the MID will complete the activities prior to June 30, 2024.

12. (Maximum 10 points)

Explain the proposed budget for the included activities and if the costs are reasonable.

### **38.6.5 Proposal Submission Requirements**

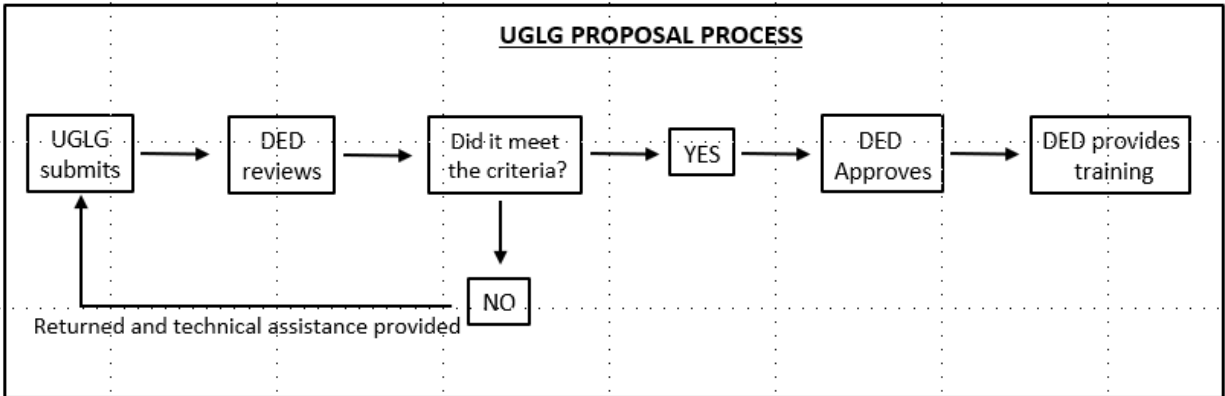
- The lead MID applicant will submit the electronic proposal submission to the Missouri Department of Economic Development no later than May 1, 2021.
- Proposals will be submitted both in electronic and hard copy (hard copy may be mailed after electronic submission is uploaded)
- Instructions and the link for uploading the electronic copy of the proposal can be found at: <https://ded2.mo.gov/programs/cdbg/disaster-recovery> under “Upload Program Documents.”
- The hard copy original application mailed to:
 

Missouri Department of Economic Development  
Business and Community Solutions - CDBG-DR  
PO Box 118  
301 W High St  
Jefferson City, MO 65101
- Applicable Engineering reports and architectural plans, and support letters, are due at the same time as the electronically proposal submission.



- Hard copy format: Proposal should be binder clipped along the left side. Please do not use special bindings or report covers.
- Support letters: Applications or proposals must be accompanied by letters of support from the State Senator and State Representative.

### 38.6.6 Approval Workflow



## 39. BASIS FOR ALLOCATION

In the January 27, 2020 Federal Register, HUD identified St. Charles County and two Zip Codes (one in Cole and one in Holt County) as areas as the Most Impacted and Distressed (MID). Based on Missouri’s Unmet Needs Assessment, Missouri concurs with this analysis. The counties of Cole, Holt and St. Charles saw a majority of the disaster impact in housing and especially on Low - to Moderate- Income citizens. The three counties were the top three FEMA Individual Assistance applicant counties. They had 890 of the 2,217 (40%) FEMA Individual Assistance applicants. Cole, Holt and St. Charles counties had over \$7,000,000 of the \$13,500,000 FEMA Homeowner Housing damage. They were the three counties with the highest percentages of Low- to Moderate-Income citizens impacted by the disaster, with 1,232 of the 2,271 impacted Low- to Moderate-Income citizens. The three counties were the first, second and fourth highest percentage of Low- to Moderate-Income Renters impacted counties in the disaster. They were also the top three counties in citizens with Access Functional Needs impacted by the disaster. Of the 304 citizens with Access Functional Needs, 123 were in Cole, Holy and St. Charles counties. The flooding and tornado damage created a greater and more significant unmet need in Cole, Holt and St. Charles counties than any other area in Missouri, especially on vulnerable populations like Low- to Moderate-Income citizens and those with Access Function Needs. Housing made up 73% of the Unmet Need. Given the amount of the grant combined with the large percentage of housing damage and high number of LMI citizens and vulnerable populations in the three MID counties, Missouri will expend all funds on housing in Cole, Holt and St. Charles Counties.

## 40. CRITERIA TO DETERMINE METHOD OF DISTRIBUTION

Given the amount of damage in combination with the grant amount, Missouri concurs with HUD analysis and will expend all funding in the three Most Impacted and Distressed areas, Cole, Holt and St. Charles Counties.

## 41. CLARITY

Missouri will conduct three virtual Public Meetings to explain the 2019 DR-4451 Disaster Recovery Program and to answer any questions from UGLGs and Citizens.

The initial purpose of the Public Meetings is to garner and solicit citizen input on this Action Plan. Missouri will seek citizen input and respond accordingly, making changes where necessary and adjusting and modifying the plan. While a COVID-19 environment may impact the methodology, Missouri will be in full compliance with 83 FR 5851. Missouri has extensive CDBG-DR experience with previous disasters as well as conducting successful outreach events associated with CDBG-Mitigation.

For this Action Plan the following are the key points to ensure a full understanding:

- Missouri received a HUD CDBG-DR grant for \$30.7 Million dollars
- HUD has designated in the MID (St. Charles County, zip code 64437 (Holt County), zip code 65101 (Cole County) as outlined in the January 27, 2020 Federal Register 85 FR 4683.
- HUD requires 80% of the funds to be spent in the MID areas
- Missouri conducted a thorough unmet needs assessment and concurs with the HUD analysis
- All funds will be expended in Cole, Holt, and St. Charles counties
- HUD requires that 70% of the funding benefit Low- to Moderate-Income (those who make 80% or less of the Area Median Income of the county they reside in) Households
- Missouri will only prioritize Households who are Low- to Moderate-Income or belong to other vulnerable populations
- UGLGs will conduct outreach and marketing in the areas to be served by the voluntary local buyout program
- UGLGs will be responsible for application processing, determining eligibility and accounting for all Duplication of Benefits (DOB), in delivering the voluntary local buyout program
- Missouri will establish DOB policy and will ensure compliance
- Missouri will, through program policy and procedures, ensure UGLGs will apply exception policy if applicable and approved by the State.
- The program activities will consist of the following:
  - Local Planning
  - Housing Counseling (Public Service Activity)
  - Acquisition for Demolition only
  - Affordable Multifamily Rental Housing
  - New Construction of Affordable Housing

Homeowner Rehabilitation

Homeowner Assistance – Down Payment Assistance

Local Voluntary Buyouts

Infrastructure in Support of Housing Recovery

- Citizens are provided a 30-day citizen participation period to provide input and comment on this plan

## 42. SUBSTANTIAL AMENDMENT

Missouri defines a Substantial Amendment as an amendment to the Action Plan shall be considered substantial (requiring public notification and comment period) in the following events:

- a new funding source be added to the Action Plan
- the addition or deletion of an activity
- a change in program benefit or eligibility criteria
- the allocation for a new funding category or reallocation of a monetary threshold more than 25% of the allocation transferred between funding categories not to exceed HUD established maximums

## 43. CONSULTATION

### 43.1. Missouri Disaster Recovery Framework, Whole Community Approach

State of Missouri established the Missouri Disaster Recovery Framework (MDRF) which is structured to mirror the National Disaster Recovery Framework (NDRF), to: “incorporate proven recovery principles, aligns with the national coordination structure to better address gaps and needs, avoid duplication of efforts, and leverage resources during long-term recovery. The coordination structure identifies leadership positions, defines roles and responsibilities, and encompasses all functions of a community.” Details on the process and outcomes of this collaboration that incorporated Recovery Support Functions (RSFs) at both State and Federal levels, as well as Whole Community meetings, can be found at: <https://recovery.mo.gov/> > Documents. Below is a summary of the effort, initiated October 2019.

The MDRF’s Recovery Support Functions (RSFs) were activated for both DR-4435 and DR-4451, including:

- **Economic** led by Missouri Department of Economic Development
- **Health and Social Services** led by Missouri Department of Health and Senior Services
- **Housing** led by the Missouri State Treasurer’s Office and MHDC
- **Infrastructure Systems** led by the Missouri Department of Transportation
- **Natural and Cultural Resources** led by the Missouri Department of Natural Resources
- **Community** (local management and planning capacity) led by Missouri Department of Economic Development
- **Agriculture** led by the Missouri Department of Agriculture.

Although the State of Missouri had been engaged in building the Missouri Disaster Recovery Framework (MDRF), to mirror the National Disaster Recovery Framework (NDRF) since 2016, DR-4435 and DR-4451

were the first Presidentially declared disasters where all six of Missouri’s Recovery Support Functions, and a full-time dedicated State Disaster Recovery Coordinator, were actively working alongside federal and state partners toward long-term recovery.

As a result, in FEMA-4435-DR-MO and FEMA-4451-DR-MO, the following RSFs were integrated into the Joint Field Office:

- Agriculture led by USDA as a unique RSF to address the significant damages to the State’s agricultural sector and the associated impacts on all other sectors
- Community Planning and Capacity Building (CPCB) led by FEMA
- Economic led by EDA
- Housing led by HUD
- Infrastructure led by USACE
- Natural and Cultural Resources led by the Department of the Interior.

*Note: Health and Social Services was not stood-up those elements are currently integrated through all other RSFs as appropriate.*

The direct collaboration between MDRF and NDRF teams included weekly work sessions and three Whole Community Partner Flood Recovery meetings, held November 25, January 6 and February 24, which resulted in the Recovery Support Strategy (<https://recovery.mo.gov/media/pdf/recovery-support-strategies>) for the State of Missouri. Recovery Strategies identified closely mirror those identified in relevant Federal Registers, and therefore inform the objectives within this Action Plan. Additional information on this process can be found in the section of this Action Plan labeled “Disaster Recovery and Response Plan.”

### **43.2. Publication**

On July 30, 2020 the State of Missouri’s 2019 CDBG-DR Action Plan was posted for public comment on the Department of Economic Development website <https://ded2.mo.gov/programs/cdbg/disaster-recovery> (ded.mo.gov – Community Development Block Grant Disaster Recovery). Comments regarding the CDBG-DR Action Plan were accepted through August 29, 2020. DED accepted all feedback, and answered all citizen questions. A summary of questions and comments received concerning this plan is included in Annex B of this Action Plan. HUD granted the State an extension in order to make changes to the initial draft. DED, in consideration of public comments and questions, made changes to plan that expanded the program design with additional housing activities, as well as adding an infrastructure activity that will support housing recovery and setting aside planning funds for each MID.

The revised draft Action Plan, containing these changes resulting from the public comment period, is prominently posted, as of **November 20, 2020**, on the DED website <https://ded2.mo.gov/programs/cdbg/disaster-recovery> (ded.mo.gov – Community Development Block Grant Disaster Recovery) for a minimum of 30 days. Comments regarding the revised draft CDBG-DR Action Plan will be accepted through **December 22, 2020**. Comments will be accepted at the CDBG-DR email address: [MOCDLG-DR@ded.mo.gov](mailto:MOCDLG-DR@ded.mo.gov).

Comments can also be mailed to the Missouri Department of Economic Development, 301 W. High Street, P.O. Box 118, Jefferson City, MO 65102-0118, but must be received by 5pm on the last day of the 30-day comment period.

See ANNEX B. State of Missouri Public Notice, Schedule of Public Engagements, and Citizen Participation Plan for State CDBG-DR for more details.

#### ❖ Accessibility

The State of Missouri supports accommodation for citizens with limited English proficiency. All documentation available to the public on the website will be available in the appropriate language of the individual accessing it. The website is Section 508 compliant (as are all the State of Missouri sponsored websites.)

The State of Missouri follows ADA-compliant standards for website accessibility and readability. The content and web page layout is designed with best practices for adaptive aids use in mind.

See ANNEX B. State of Missouri Public Notice, Schedule of Public Engagements, and Citizen Participation Plan for State CDBG-DR for more details.

## **44. PROPOSAL STATUS**

### **44.1 Communications**

The lead MID applicant will apply to the State of Missouri DED for the activities that are included in the 2019 DR-4451 within the housing, planning, public services, and infrastructure in support of housing Disaster Recovery Program. Missouri has devised three mechanisms for our grantees and their sub-recipients to gain real-time access to the status of applications made to the Missouri Department of Economic Development (MO-DED) for assistance:

- Telephone MO-DED point of contact
- Email MO-DED point of contact
- Website view

Once DED receives the proposal, DED will review the proposal utilizing a checklist that measures the established evaluation criteria. DED will communicate with the MID applicant as to what is needed to bring the proposal to the satisfactory level, in line with the established criteria. DED will communicate the questions and comments from the checklist to the MID applicant, and provide the technical assistance necessary for the proposal to meet a satisfactory evaluation.

The proposal status process is applicable to all CDBG-DR funded activities with the exception of the option for affordable rental recovery to leverage LIHTC. Developers submitting an application to MHDC for LIHTC funding, leveraging CDBG-DR funds, may check the status of their application according to MHDC's designated process.

The Missouri will maintain a website which will serve as a central source for program information and transparency in the management of federal dollars. It is a powerful tool for public participation and engagement. Posted information may include:

- Procurement policies and procedures
- Executed CDBG-DR contracts.
- Critical information regarding the status of services or goods currently being procured by the State for the CDBG-DR program will be posted in real-time during formal procurement processes

(e.g., phase of the procurement, requirements for proposals, etc.). Once the procurement process is closed, these documents will be removed from the website and contracts for hired vendors will be posted as aforementioned executed CDBG-DR contracts.

- Announcement of Public Engagements including Public Meetings or Informational Meetings will be posted to the website as well local newspapers.
- The 2019 Action Plan for Disaster Recovery will be posted for no less than 30 calendar days to solicit public comment before being submitted to HUD. The final approved Action Plan will then be posted to a permanent section on the website designated for Action Plans and Amendments.
- Substantial Action Plan Amendments will be posted for no less than 30 calendar days to solicit public comment before being submitted to HUD.
- HUD approved Action Plan Amendments will be posted on the website.
- Non-substantial Action Plan Amendments will not be posted for public comment. These Amendments will be posted on the website.
- Each Quarterly Progress Report (QPR) will be posted to the website.
- The Citizen Participation Plan will reside permanently on the website.
- Grant awards to MIDs.
- Program general inquiry phone number and general inquiry email
- General program expenditure and production progress reports
- Program and policy FAQs

Content for the site will be generated from all aspects of the program and will be drafted by operational staff with purview over the subject matter. All content will undergo draft review before final approval prior to posting.

#### **44.2 Accessibility**

The State of Missouri supports accommodation for citizens with limited English proficiency. All documentation available to the public on the website will be available in the appropriate language of the individual accessing it. The website is Section 508 compliant (as are all the State of Missouri sponsored websites.)

The State of Missouri follows ADA-compliant standards for website accessibility and readability. The content and web page layout is designed with best practices for adaptive aids use in mind.

## 45. GRANT MANAGEMENT AND BUDGET

### 45.1. Budget

2019 Missouri CDBG-DR Funding			
FUNDING	% OF GRANT	\$ AMOUNT	\$ AMOUNT BREAKDOWN
Total Grant Funding		\$30,776,000	
Administration Funding	5%	\$1,538,800	\$1,538,800 for State Administration of the Grant
Planning Funding	3%	\$1,000,000	\$250,000 for State Planning \$250,000 for Cole County for Local Mitigation, Preparedness and Resilience Planning \$250,000 for Holt County for Local Mitigation, Preparedness and Resilience Planning \$250,000 for St Charles County for Local Mitigation, Preparedness and Resilience Planning
Program Delivery Funding	• Cole County 25% • Holt County 20% • St Charles 55%	92%	\$28,237,200
			\$7,059,300 for Cole County (Minimum of \$4,941,510 to benefit LMI) \$5,647,440 for Holt County (Minimum of \$3,953,208 to benefit LMI) \$15,530,460 for St Charles County (Minimum of \$10,871,322 to benefit LMI)
HUD Requirement for 70% (\$19,766,040) of the Program Delivery Total Funding to Benefit Low to Moderate Income Households			

### 45.2. Cost Verification

Missouri will ensure Cost Reasonableness in accordance with 83 FR 4031 and all other Federal cross cutting requirements. As evidenced by the HUD financial certifications, Missouri has numerous systems in place specifically designed for CDBG-DR funding. All Sub-Recipient, Developers and/or Contractors concerning construction will provide assurance that Missouri is paying a fair market value for construction materials.

In order to reasonably prove costs are reasonable and consistent with market costs at the time and place of construction, assurance should come in the form of product sourcing documentation submitted to Missouri, including cost comparisons across multiple sourcing options within reasonable distance per sourcing norm to project location on major project line items. Sourcing options provided should to include source option chosen. Major project line items may be determined by the item's intrinsic nature to the project, or by percentage of the expenditure category relative to overall cost of the project.

- Cost reasonableness assurance should be submitted to Missouri prior to project start. Project Start is to be defined as no more than 10% completion on site work (where applicable) or no more than 10% completion on construction work for the project.
- After Project Start, cost reasonableness assurance should be submitted to Missouri on a Quarterly basis for active projects.
- Cost reasonableness controls apply to all of the following:
  - Housing projects involving 8 or more units (whether new construction, rehabilitation, or reconstruction)
  - Infrastructure projects as required by 83 FR 40318.

DED will review submissions for cost reasonableness recognizing that actual costs may differ from county to county depending on market conditions). UGLGs may adopt DED's policies, or may develop their own policies for review and approval by DED prior to expenditure of funds.

### 45.3. Program Income

The use of CDBG-DR funds may potentially generate program income. The definition and use of Program Income for CDBG programs is addressed in 24 CFR 570.489 (e). The following Federal Register Notices also provide further definition on Program Income:

- CDBG-DR (83 FR 5844)
- CDBG-MIT (84 FR 45838)

Program income is defined as gross income (in excess of \$35,000 in a year) received by a state, a unit of general local government, or a subrecipient of a unit of general local government that was generated from the use of CDBG funds in a single calendar year (with a few exceptions). When the income is generated by an activity that is partially assisted with CDBG funds, the income will be prorated to reflect the percentage of CDBG funds used. Should any funds be generated including program income, refunds and rebates will be used before drawing down additional CDBG-DR funds. The DRGR system requires grantees to use program income before drawing additional grant funds and ensures that program income retained by one will not affect grant draw requests for other grantees. Grantees will be required to report program income quarterly and will be subject to applicable rules, regulations and HUD guidance. Retention of program income will be in compliance with the grantee agreements. Policies and procedures for program income are included in the CDBG-DR Implementation Manual.

### 45.4. Projections for Expenditures and Performance Outcomes

#### 45.4.1 Projected Milestones in Expenditures and Performance

PROGRAM	\$ AMOUNT		YEAR 1				YEAR 2			
			Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
ADMIN	\$1,538,800		\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000
PLANNING	\$1,000,000									\$100,000
PROGRAM DELIVERY							\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000
<i>Housing Activities</i>	\$28,237,200	\$ Amount								
<i>Infrastructure Activities</i>										
	<b>TOTAL</b>		\$65,000	\$65,000	\$65,000	\$65,000	\$1,565,000	\$1,565,000	\$1,565,000	\$1,665,000

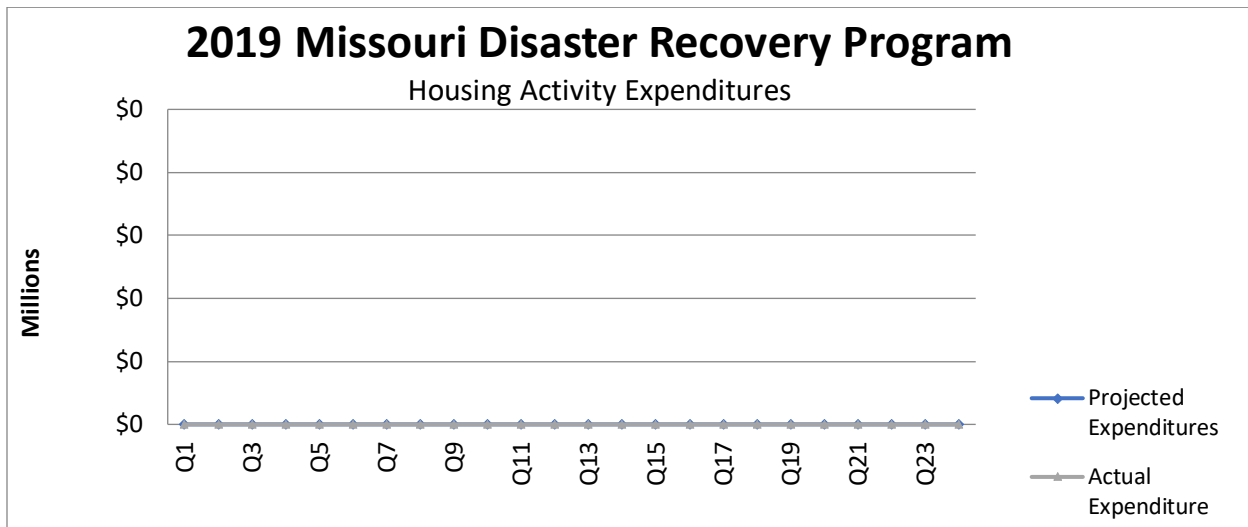
PROGRAM	\$ AMOUNT		YEAR 3				YEAR 4			
			Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
ADMIN	\$1,538,800		\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000
PLANNING	\$1,000,000		\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000
PROGRAM DELIVERY			\$2,000,000	\$2,000,000	\$2,000,000	\$2,500,000	\$2,500,000	\$2,000,000	\$2,000,000	\$2,000,000
<i>Housing Activities</i>	\$28,237,200	\$ Amount								
<i>Infrastructure Activities</i>										
	<b>TOTAL</b>		\$2,165,000	\$2,165,000	\$2,165,000	\$2,665,000	\$2,665,000	\$2,165,000	\$2,165,000	\$2,165,000



PROGRAM	\$ AMOUNT		YEAR 5				YEAR 6			
			Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
ADMIN	\$1,538,800		\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$65,000	\$43,800
PLANNING	\$1,000,000		\$100,000							
PROGRAM DELIVERY			\$1,500,000	\$1,500,000	\$1,500,000	\$737,200				
<i>Housing Activities</i>	\$28,237,200	\$ Amount								
<i>Infrastructure Activities</i>										
	TOTAL		\$1,665,000	\$1,565,000	\$1,565,000	\$802,200	\$65,000	\$65,000	\$65,000	\$43,800

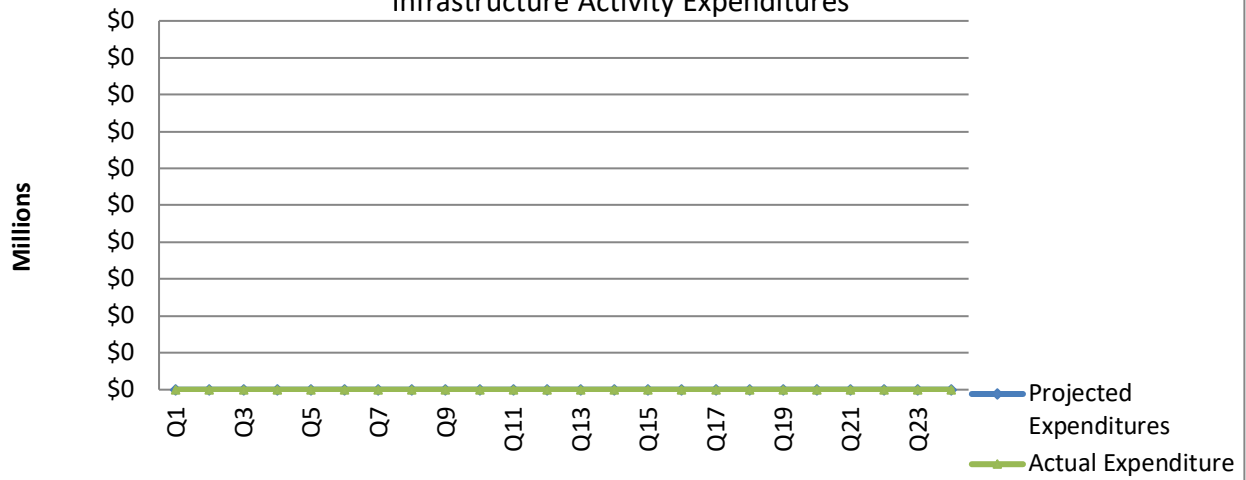
#### 45.4.2. Projected Budget Expenditure

Through the State’s Method of Distribution Proposal process, each MID will determine which activities will be implemented to assist recovery needs. Until the State receives and approves these proposals, it is undetermined how to split the projections of expenditures between Housing and Infrastructure expenditures. Missouri will submit an amendment updating the Housing and Infrastructure expenditures once all three MIDs have submitted their proposals and they have been approved by DED.



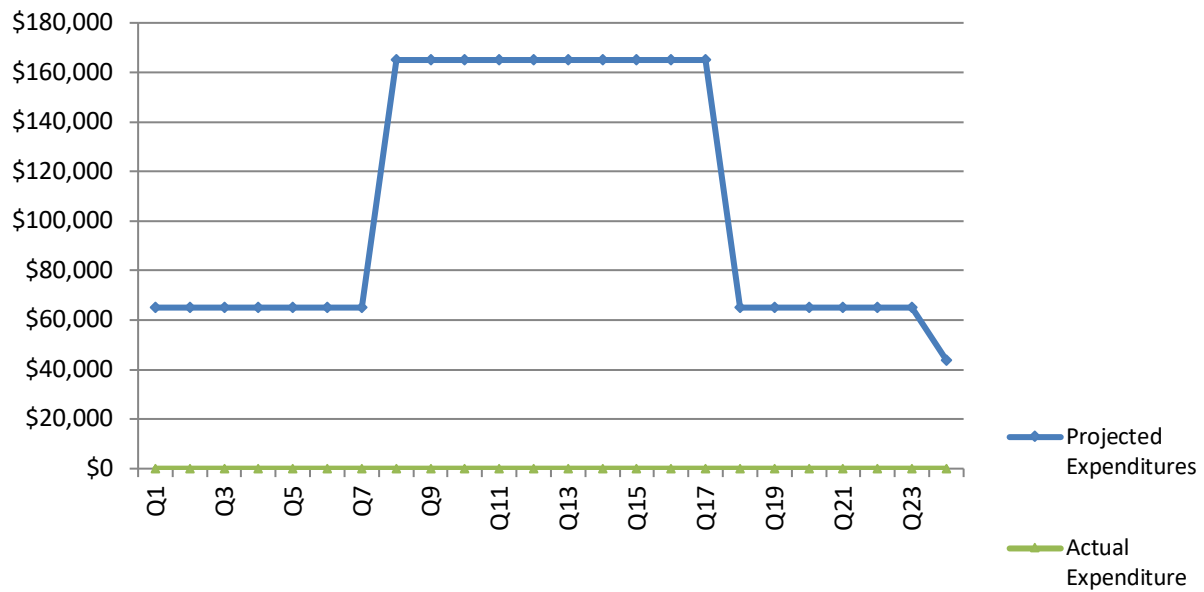
## 2019 Missouri Disaster Recovery Program

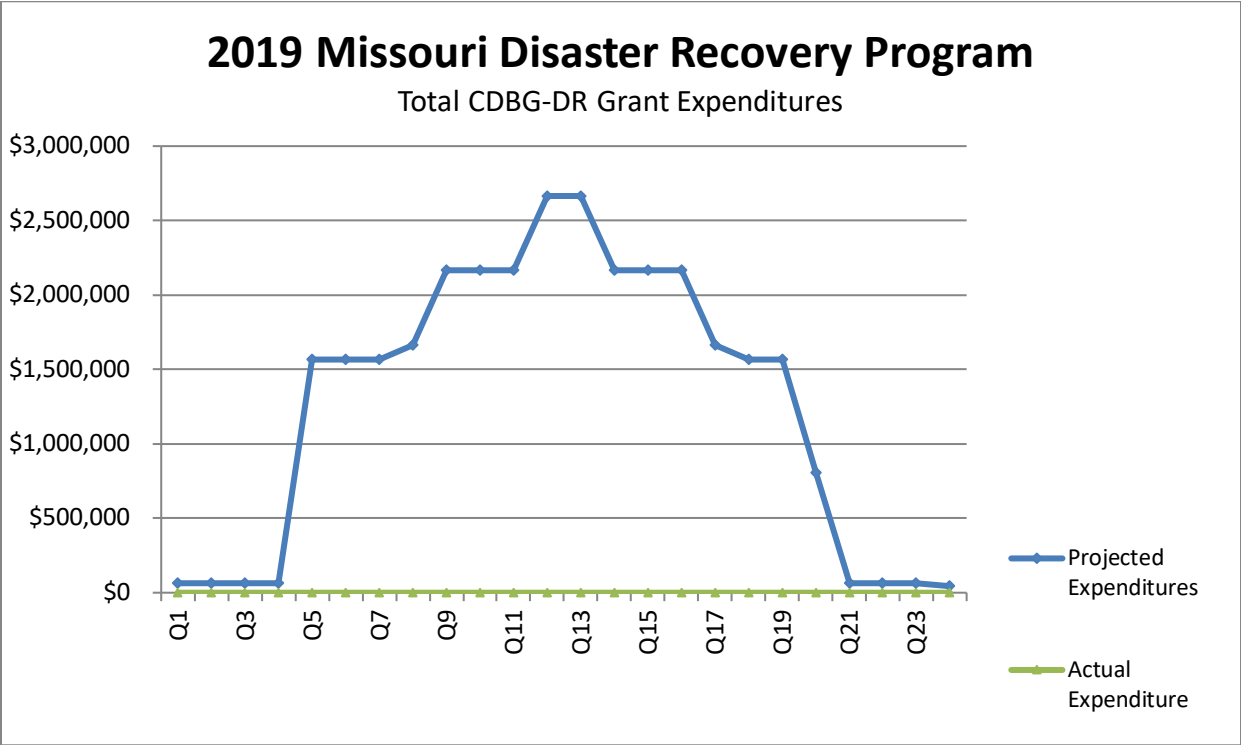
### Infrastructure Activity Expenditures



## 2019 Missouri Disaster Recovery Program

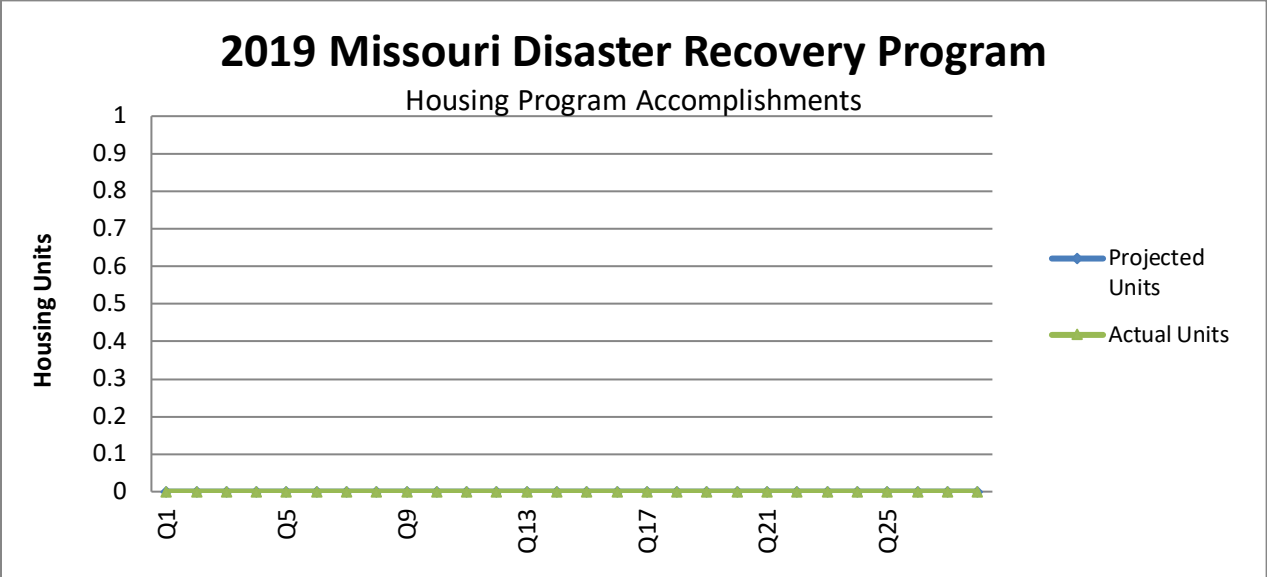
### Planning & Administrative Expenditures

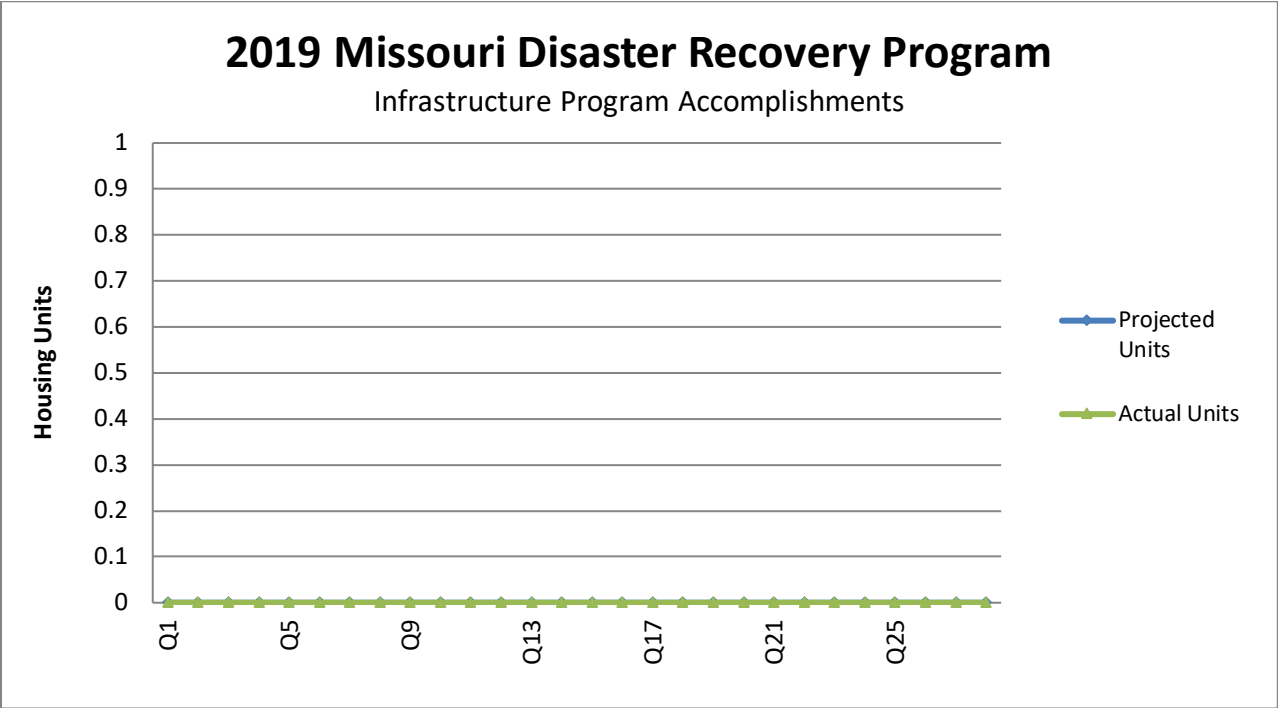




**45.5 Projected Performance Outcome**

Through the Method of Distribution, activities undertaken will be determined by the proposals submitted by the MIDs. Therefore, until all three MIDs have submitted their proposals and the DED has approved, it is undetermined what performance projections between Housing and Infrastructure activities will result. Missouri will submit an amendment updating the Housing and Infrastructure performance projections once all three MIDs have submitted their proposals and they have been approved by DED.





**46. UNIFORM RELOCATION ACT**

In regard to applicable Uniform Relocation Act requirements, the State of Missouri through policy and procedures will define “demonstrable hardship”.

**47. SF-424**

*The State of Missouri will provide a completed and executed Federal form SF-424 signed by the correct grantee official as described in the February 9, 2018 Federal Register Notice. See Appendix N.*

**ANNEXES**

- A. Limited English Proficiency (LEP)
- B. Schedule of Public Engagements
- C. Public Comments & Responses
- D. Citizen Participation Plan

## ANNEX A.

### STATE OF MISSOURI LANGUAGE ACCESS PLAN FOR STATE CDBG, CDBG-CV, CDBG-DR, AND CDBG-MIT

#### Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d), and Executive Order 13166 require that recipients who administer Federal funds take responsible steps to ensure meaningful access by persons with limited English proficiency (LEP persons). The State of Missouri's Department of Economic Development (MO DED) administers the State's regular Community Development Block Grant (CDBG) program, CDBG-CV, CDBG-DR, and CDBG-MIT programs and is a recipient of Federal funds from the U.S. Department of Housing and Urban Development (HUD) and, thus, obligated to reduce language barriers that can preclude meaningful access for LEP persons to these programs. DED 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 by LEP persons.

In preparing this plan, DED conducted a four-factor analysis that considers the following:

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 the Agency's program.
3. The nature and importance of the program, activity, or service to people's lives.
4. The resources available and the associated costs.

The Missouri 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 provide direction on DED LEP needs as identified by the four-factor analysis data. The LAP also describes how DED and its subrecipients will provide meaningful language access services to address those needs. DED and its subrecipients will provide two primary types of services: oral and written. Oral language access services may come in the form of "in-language" communication by a qualified bilingual staff member directly in an LEP person's language and interpreter services. Written language access services will come in the form of a written translation provided by DED translators or a translation vendor.

DED and its subrecipients will engage in specific outreach efforts in accordance with Missouri's Citizen Participation Plan and this LAP to ensure that LEP persons are aware of the language access services available to them. DED and its subrecipients will also provide training to program-level LAP coordinators and direct service staff on how to implement this LAP and the methods of assistance available to LEP individuals. DED and its subrecipients are committed to this LAP as the appropriate response to meeting our LEP clients' needs, as well as complying with Title VI, Executive Order 13166, and Final Guidance (72 FR 2732).

#### Definitions

The following definitions will apply to this plan.

- **Language Access Plan (LAP):** The State of Missouri's plan to ensure meaningful access by persons with limited English proficiency (LEP persons).

- **Limited English Proficiency (LEP):** Limited English proficiency persons do not speak English as their primary language and 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, DED 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.”

**Subrecipient:** The entity designated as a recipient for assistance with Federal or State funding. This is any entity that receives Federal assistance directly from DED CDBG, CDBG-CV, CDBG-DR, and CDBG-MIT. 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.

## DESCRIPTION OF APPLICABLE PROGRAMS

MO DED is the recipient of funding from HUD, which consists of annual State CDBG funds, CDBG funds for COVID-19 response (CDBG-CV), CDBG Disaster Recovery (CDBG-DR) funds, and CDBG Mitigation (CDBG-MIT) funds. DED then sub-grants this funding to eligible subrecipients throughout the State of Missouri, and such subrecipients 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 that must be utilized for housing, infrastructure, economic development, hazard mitigation, and planning.
- **CDBG-MIT:** A unique opportunity to use assistance in areas impacted by recent disasters to carry out strategic and high-impact activities to mitigate disaster risks and reduce future losses.
- **CDBG-CV:** Grants that fund local public services and microenterprise assistance programs; public health, emergency response, or temporary housing facilities that address COVID-19 impacts; and grant administration.

## Four Factor Analysis

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

DED’s service area generally consists of the entire State of Missouri. Communities meeting certain population thresholds set forth by HUD are designated as entitlement communities and are not eligible to receive the annual State CDBG funds. However, these communities can receive CDBG-DR or CDBG-MIT funds if they are part of the communities included in the Disaster Declaration resulting in a CDBG-DR or CDBG-MIT 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, the Missouri CDBG reviewed the 2015 5-year American Community Survey (ACS) data (Table B16001) to find what the primary languages were for people who 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%)
- Russian (3,576 or 0.1%)

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

HUD has established “safe harbor” thresholds regarding the responsibility to provide translation of vital documents for LEP populations. This safe harbor is based on the number and percentages of the service area-eligible population or current beneficiaries and applicants that are LEP persons. 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.

The Missouri CDBG has identified 15 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 a LEP population other than the Spanish-speaking population that exceeds the HUD safe harbor threshold, as indicated in the table below. The table sets forth safe harbors for written translations for Missouri counties and St. Louis City.

Note:

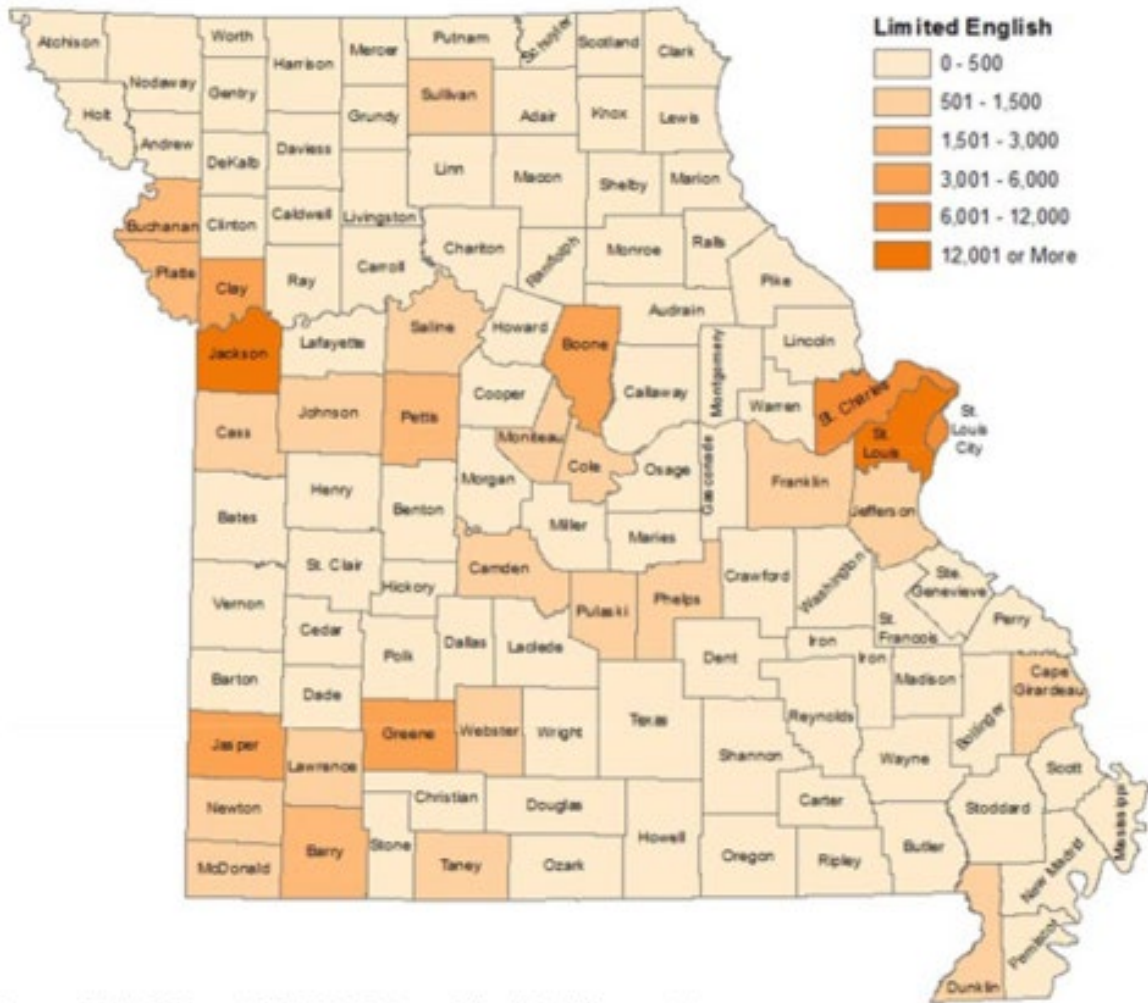
- Italicized Counties represent Counties included in DR-4317 Presidential Disaster Declaration and are identified as State Most Impacted and Distressed (MID) counties.
- Counties in **red** are included in DR-4317 and identified as containing a HUD MID zip code.
- Counties in **blue** are included in DR-4451 and identified as a HUD MID county.

Size of Language Group	Recommended Provision of Written Language Assistance	Missouri County and Language(s)
1,000 or more in the eligible population in the market area or among current beneficiaries	Translation of Vital Documents	<b>Barry</b> – Spanish <b>Boone</b> – Chinese <b>Buchanan</b> – Spanish <b>Cass</b> – Spanish <b>Clay</b> – Spanish <b>Jackson</b> – Spanish, Vietnamese, African <b>Jasper</b> – Spanish <b>McDonald</b> -Spanish <b>Pettis</b> – Spanish <b>Pulaski</b> – Spanish <b>St. Charles</b> – Spanish, Vietnamese <b>St. Louis City/County</b> – Spanish, Russian, Serbo-Croatian, Chinese, Korean, Vietnamese, Arabic, Asian <b>Webster</b> - German
More than 5% of the eligible population or beneficiaries and <b>50 or more</b> in number	Translation of Vital Documents	<b>Barry</b> – Spanish <b>McDonald</b> – Spanish <b>Sullivan</b> - Spanish
More than 5% of the eligible population or beneficiaries and <b>50 or less</b> in number	Translation of Notice of Right to Receive Free Oral Interpretation of Vital Documents	None
5% or less of the eligible population or beneficiaries and less than 100 in number	No written translation is required	As applicable



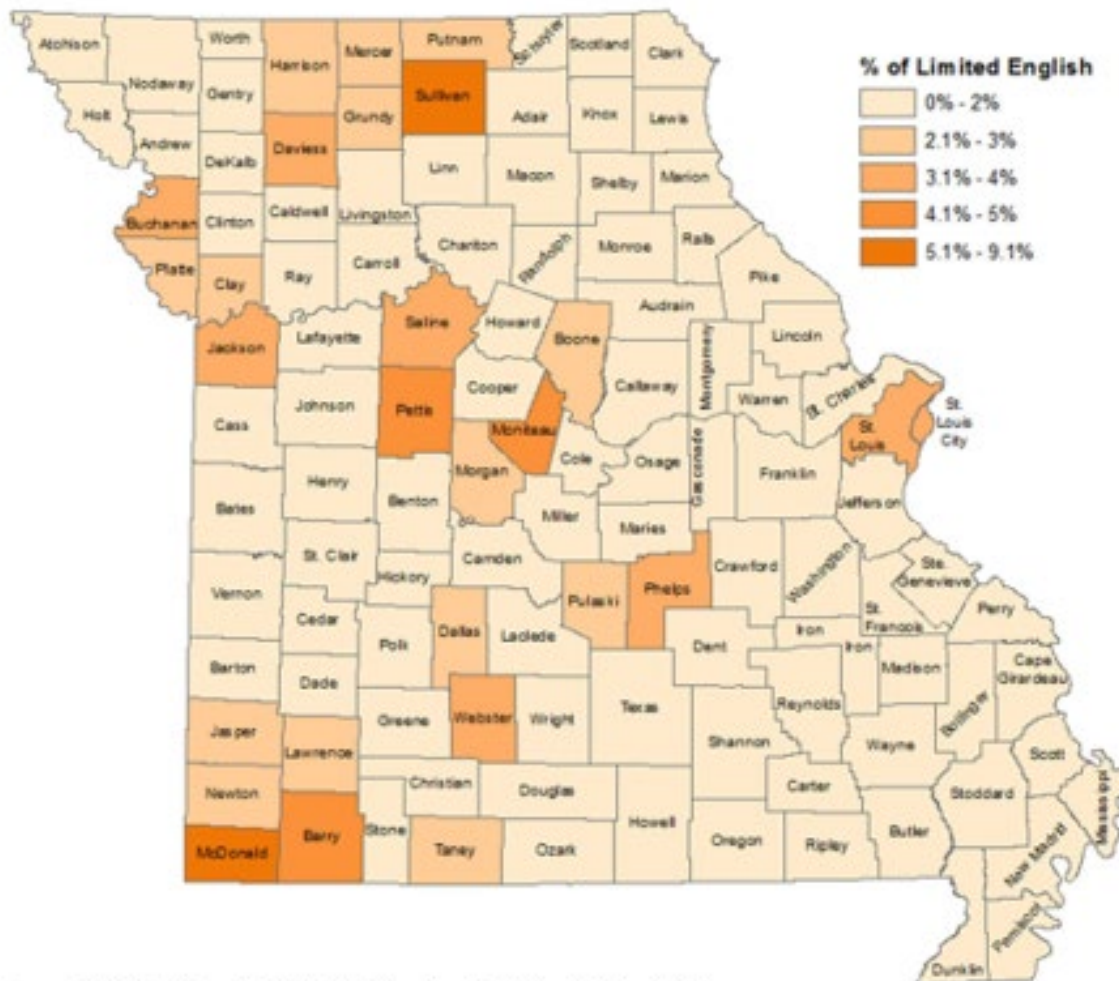
The map below identifies the number of persons per county with LEP.

## Population of Limited English Proficiency By County



The following map identifies the percentage of LEP persons per capita by county.

## Per Capita Percentage of Limited English Proficiency By County



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

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

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

- Persons participating in the annual CDBG planning process for DED programs
- Individuals utilizing the State's complaint/application status process
- Individuals accessing the CDBG, CDBG-DR, and CDBG-MIT websites

**Factor Three: Nature & Importance of the Programs, Activity, or Services Provided by Missouri CDBG**

DED understands that the more important the activity, information, services, or program, the greater the possible consequences of the contact to LEP persons, and the more likely language services are needed. The programs administered by DED result in subrecipients of HUD funding from DED carrying out projects, and in some instances, providing direct assistance to LEP persons and families. It is likely that the type of project activities proposed by the subrecipient will impact the level and type of language assistance needed to be provided. See Attachment A for LEP guidance to subrecipients.

DED evaluated which of its programs are most likely to require language access services based on the program’s audience. At the DED level, it is most important for language assistance services be provided for citizen participation efforts undertaken by CDBG, as this is when it is most likely that LEP individuals will come into contact with CDBG directly. It is also important that DED provides information to LEP persons that will allow them to file a complaint if they believe that they have been denied the benefits of language assistance. The table below demonstrates DED evaluation of the CDBG-MIT programs.

The table below demonstrates DED evaluation of the CDBG-MIT programs.

CDBG-MIT Program	Agency	Audience	Potential Interaction with LEP Persons
<b>General Infrastructure</b>	DED	Subrecipient Local Government or COG	The most likely potential for this program to interact with LEP persons will be when the local government holds a public hearing regarding the CDBG-MIT planned activities in their community.
<b>Public Facility Hardening</b>	DED	Subrecipient Local Government or COG	The most likely potential for this program to interact with LEP persons will be when the local government holds a public hearing regarding the CDBG-MIT planned activities in their community.
<b>Generators for Critical Facilities</b>	DED	Subrecipient Local Government or COG	The most likely potential for this program to interact with LEP persons will be when the local government holds a public hearing regarding the CDBG-MIT planned activities in their community.
<b>Warning Systems</b>	DED	Subrecipient Local Government or COG	The most likely potential for this program to interact with LEP persons will be when the local government holds a public hearing regarding the CDBG-MIT planned activities in their community.

For all CDBG, CDBG-CV, CDBG-DR, and CDBG-MIT, DED and its subrecipients will interact with LEP persons through a variety of means. These may include, but are not limited to, the following:

- In-person and telephone contact with program applicants and participants
- Hotline or information line calls
- Outreach programs
- Public access to agency websites.
- Written correspondence, notices, or complaints sent to an agency
- Agency brochures intended for public distribution

DED will also provide appropriate language access services for LEP persons when Action Plan or Substantial Action Plan Amendments are considered, and public citizen participation periods are opened.

#### **Factor Four: Available Resources & Costs**

DED has limited resources available for the administration of HUD-funded programs. These resources primarily come from the percentage of CDBG, CDBG-CV, CDBG-DR, and CDGB-MIT program funding that is allowed to be used for the administration of such programs. DED will use these administrative 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 on 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. DED may also, when appropriate, utilize free websites to translate written materials. The costliest option for providing LEP services would be to contract with outside persons who are proficient in the interpretation of spoken word and in the translation of documents. DED will do this when necessary. It is expected that the cost of obtaining such services will vary depending on the nature of the services requested and the service provider selected.

#### **Point of Contact**

The CDBG communication specialist is the designated point of contact for coordination of LEP compliance and services.

##### **CDBG Communication Specialist**

P.O. Box 118

Jefferson City, MO 65109

Email: mocdbg@ded.mo.gov

Phone: 573-751-3600

#### **Identification of LEP Individuals who need Language Assistance**

The Missouri 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. The LAP will be updated to reflect changes in language assistance needs

## Language Assistance to be provided

- DED will provide language assistance as requested and as appropriate.
- DED 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:
  - CDBG-DR site <https://ded2.mo.gov/programs/cdbg/disaster-recovery>
  - CDBG-MIT site <https://ded2.mo.gov/programs/cdbg/mitigation>
- When, and if appropriate, DED may utilize free websites and computer programs to translate written materials.
- As needed, DED will contract with entities that are proficient in the interpretation of spoken word and the translation of documents. A list of identified contractors is available through the Missouri Office of Administration.
- DED will maintain an open contract with an approved Office of Administration vendor to provide language assistance through a voice interpretation service via telephone. DED will keep a copy of the instructions for using this service on the Department's internal shared drive.
- DED will provide, on a prior request basis, interpretation assistance for public hearings from a qualified contractor.
- DED will translate vital documents, including, but not limited to, the Citizen Participation Plan and complaint procedures, into Spanish (and other languages, as needed, may be identified in the future).

## MISSOURI CDBG, CDBG-CV, CDBG-DR, AND CDBG-MIT GRANTEE LANGUAGE ACCESS PLAN GUIDANCE

This document provides additional guidance on how to accomplish timely and reasonable steps to provide limited English proficient (LEP) persons with meaningful access to programs and activities funded by the Federal Government and awarded by the Missouri CDBG, CDBG-CV, CDBG-DR, and CDBG-MIT. Refer to the CDBG Language Access Plan Policy and the Civil Rights section of the CDBG Administrative Manual, then complete the steps described in detail below to develop a local LAP.

### STEP 1: PROVIDE GENERAL INFORMATION

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

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

## **STEP 2: CONDUCT A FOUR-FACTOR ANALYSIS TO DETERMINE HOW TO PROVIDE NEEDED LANGUAGE ASSISTANCE**

Subrecipients are required to take reasonable steps to ensure meaningful access to LEP persons. This “reasonableness” standard is intended to be flexible and fact dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations. Use data to answer the question:

- How many limited English proficient people are in your local government’s city or county’s jurisdiction?
- Attach maps (if applicable) or other relevant data to your Language Access Plan. All data or maps provided must be accurately sourced.

As a starting point, a subrecipient may conduct an individualized assessment that balances the following four factors.

### **FACTOR 1: DETERMINE THE NUMBER OF LEP PERSONS SERVED OR ENCOUNTERED IN THE ELIGIBLE SERVICE POPULATION.**

Most subrecipients will depend on the most recent release of data from American Community Survey Table B16001 (“Language Spoken at Home by Ability to Speak English”) and Table S1601 (“Language Spoken at Home”) to determine the number of LEP persons in the service area. In cases where the overall jurisdiction numbers fall below the “safe harbor” thresholds (see table below) to provide translated written documents, but existing or planned CDBG target areas exist, the CDBG subrecipient must evaluate whether there are LEP households within the target areas that may need notification or other Language Access Plan (LAP) services. The subrecipient’s evaluation should use local knowledge or data, or other relevant data in conducting its evaluation and should indicate its conclusions regarding the steps necessary reach out to these households in the language they speak to ensure that adequate notification is achieved. This evaluation will be particularly important for housing grants where eligible applicants for assistance may need application or other documents translated to take advantage of available services. All data provided must be accurately sourced. The size of the language group determines the recommended provision of written language assistance, as determined by the safe harbor thresholds outlined in the Federal Register (72 FR 2732)

**TABLE 1- SAFE HARBOR THRESHOLDS**

<b>Size of Language Group</b>	<b>Recommended Provision of Written Language Assistance</b>
100 or more in the eligible population	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents

More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1000 in number	No written translation is required

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

**FACTOR 2: THE FREQUENCY WITH WHICH LEP PERSONS COME INTO CONTACT WITH THE PROGRAM.**

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

For CDBG, CDBG-DR, and CDBG-MIT grants, grantees and subrecipients must engage with the public at these critical stages:

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

Answer the following questions:

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



### **FACTOR 3: THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE PROVIDED BY THE PROGRAM.**

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

Determine the resources to be made available (if any).

### **FACTOR 4: THE RESOURCES AVAILABLE AND COSTS TO THE RECIPIENT**

Language assistance that a subrecipient might provide to LEP persons includes, but is not limited to, the following:

- Oral interpretation services
- Bilingual staff
- Telephone service line interpreter
- Written translation services
- Notices to staff and subrecipients of the availability of LEP services
- Referrals to community liaisons proficient in the language of LEP persons
- Provide an "I speak" card, available at <https://www.lep.gov/ISpeakCards2004.pdf>
- Use of the many brochures, handbooks, booklets, factsheets, and forms that are available in multiple languages on the HUD website at
- [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/17lep#Booklets](https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep#Booklets)

A subrecipient's level of resources and the costs that would be imposed on it may have an impact on the nature of the steps it should take. Smaller subrecipients with more limited budgets are not expected to provide the same level of language services as larger subrecipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Resource and cost issues, however, can often be reduced by technological advances; sharing of language assistance materials and services among and between subrecipients, advocacy groups, and Federal grant agencies; and reasonable business practices. Where appropriate, training bilingual staff to act as interpreters and translators, information sharing through industry groups, telephonic and video conferencing interpretation services, pooling resources and standardizing documents to reduce translation needs, using qualified translators and interpreters to ensure that documents need not be "fixed" later and that inaccurate interpretations do not cause delay or other costs, centralizing interpreter and translator services to achieve economies of scale, or the formalized use of qualified community volunteers, for example, may help reduce costs. Subrecipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.

Small subrecipients with limited resources may find that entering into a bulk telephonic interpretation service contract will prove to be cost-effective. Large subrecipients and those subrecipients serving a significant LEP population should determine a process that substantiates the need for language services. Such subrecipients may find it useful to articulate, through documentation or in some other reasonable



manner, their process for determining that language services would be limited based on resources or costs.

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

### **STEP 3: PREPARE A LANGUAGE ACCESS PLAN (LAP) & SUBMIT IT TO YOUR CDBG FIELD REP**

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

- Four-factor analysis
- Points and types of contact the agency and staff may have with LEP persons
- Procedures the subrecipient will use to identify LEP individuals who need language assistance
- Ways in which language assistance will be provided by the subrecipient
- List of vital documents to be translated (if necessary)
- Subrecipient’s plan for training staff members on LEP guidance and the LAP
- Subrecipient’s plan for monitoring and updating the LAP
- Plan for complaints and appeals

### **Language Access Plan Frequently Asked Questions**

#### ***Who are limited English proficient (LEP) persons?***

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

***What is Title VI and how does it relate to providing meaningful access to LEP persons?***

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

***What do Executive Order (EO) 13166 and the guidance require?***

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

***Who must comply with the Title VI LEP obligations?***

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

***Does a person's citizenship and immigration status determine the applicability of the Title VI LEP obligations?***

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

***What is expected of subrecipients under the guidance?***

The actions that the subrecipient may be expected to take to meet its LEP obligations depend on the results of the four-factor analysis, including the services the subrecipient offers, the community the subrecipient serves, the resources the subrecipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP. HUD recognizes that some projects' budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden on the projects. Where a HUD subrecipient can demonstrate such a material burden, HUD views this as a critical item in the consideration of costs in the four-factor analysis. However, refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI. The agency may, for example, have a contract with another organization to supply an interpreter when

needed; use a telephone service line interpreter; or, if it would not impose an undue burden, or delay or deny meaningful access to the client, the agency may seek the assistance of another agency in the same community with bilingual staff to help provide oral interpretation services.

***What are examples of language assistance?***

Language assistance that a grantee/subrecipient might provide to LEP persons includes, but is not limited to, the following:

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

***How may a grantee or subrecipient determine the language services needs of a beneficiary?***

Grantees and subrecipients should elicit language services needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). If the prospective beneficiary's response indicates a need for language assistance, the grantee/ subrecipient may want to give applicants or prospective beneficiaries a language identification card (or "I speak" card). Language identification cards invite LEP persons to identify their own language needs. Such cards, for example, might say "I speak Spanish" in both Spanish and English, "I speak Vietnamese" in both Vietnamese and English, and so forth. To reduce the cost of compliance, the Federal Government has made a set of these cards available on the internet at <https://www.lep.gov/resources/resources.html>

***How may a grantee/subrecipient's limited resources be supplemented to provide the necessary LEP services?***

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

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

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

***May the grantee/subrecipients rely on family members or friends of the LEP person as interpreters?***

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

***Are leases, rental agreements, and other housing documents of a legal nature enforceable in U.S. courts when they are in languages other than English?***

Generally, the English language document prevails. The translated documents may carry a disclaimer. For example, "This document is a translation of a HUD-issued legal document. HUD provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document." Where both the landlord and tenant contracts are in languages other than English, State contract law governs the leases and rental agreements. HUD does not interpret State contract law. Therefore, questions regarding the enforceability of housing documents of a legal nature that are in languages other than English should be referred to a lawyer well-versed in contract law of the appropriate State or locality. Neither EO 13166 nor HUD LEP guidance grants an individual the right to proceed to court alleging violations of EO 13166 or HUD LEP guidance.

In addition, current Title VI case law only permits a private right of action for intentional discrimination and not for action based on the discriminatory effects of a grantee/ subrecipient's practices. However, individuals may file administrative complaints with HUD alleging violations of Title VI because the HUD grantee/subrecipient failed to take reasonable steps to provide meaningful access to LEP persons. The local HUD office will take the complaint, in writing, note date and time, detailing the complainant's allegation as to how the State failed to provide meaningful access to LEP persons. HUD will determine jurisdiction and follow up with an investigation of the complaint.

***Who enforces Title VI as it relates to discrimination against LEP persons?***

Most Federal agencies have an office that is responsible for enforcing Title VI of the Civil Rights Act of 1964. To the extent that a grantee/subrecipient's actions violate Title VI obligations, then such Federal agencies will take the necessary corrective steps. The Secretary of HUD has designated the Office of Fair Housing and Equal Opportunity (FHEO) to take the lead in coordinating and implementing EO 13166 for HUD; however, each program office is responsible for its grantee/subrecipient's compliance with the civil rights-related program requirements under Title VI.

***How does a person file a complaint if he/she believes that the State is not meeting its Title VI LEP obligations?***

If a person believes that the State is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD's local Office of FHEO. For contact information for the local HUD office, go to the HUD website or call the toll-free Housing Discrimination Hotline at 800-669-9777 (voice) or 800-927-9275 (TTY).

***What will HUD do with a complaint alleging noncompliance with Title VI obligations?***

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

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

***How will HUD evaluate evidence in the investigation of a complaint alleging noncompliance with Title VI obligations?***

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

***What is a safe harbor?***

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

***What "safe harbors" may a grantee/subrecipients follow to ensure that they have no compliance finding with Title VI LEP obligations?***

HUD has adopted a "safe harbor" for the translation of written materials, as outlined in Table 1 of this document. The guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the grantee/subrecipient is in noncompliance. Rather, the "safe harbors" provide a starting point for the grantee/ subrecipients to consider:

- Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English.
- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English.
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English.

- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the “safe harbor” would mean the provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

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

***Is the grantee/subrecipient expected to provide any language assistance to persons in a language group when fewer than 5% of the eligible population and fewer than 50 in number are members of the language group?***

HUD recommends that the grantee/subrecipients use the four-factor analysis to determine whether to provide these persons with oral interpretation of vital documents if requested.

***Are there "safe harbors" provided for oral interpretation services?***

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

***What are the obligations of HUD grantee/subrecipients if they operate in jurisdictions in which English has been declared the official language?***

In a jurisdiction where English has been declared the official language, a HUD grantee/subrecipient is still subject to Federal nondiscrimination requirements, including Title VI requirements as they relate to LEP persons.

***Where can I find more information on LEP?***

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

**Amy Werner**

**P.O. Box 118**

**Jefferson City, MO 65109**

**Email: [mocdbg@ded.mo.gov](mailto:mocdbg@ded.mo.gov)**

**Phone: 1-(800) 253-0609**

## **ANNEX B.**

### **STATE OF MISSOURI PUBLIC NOTICE, SCHEDULE OF PUBLIC ENGAGEMENTS, AND CITIZEN PARTICIPATION PLAN FOR STATE CDBG-DR**

#### **Public Notice Requirement**

The State of Missouri is the recipient of HUD CDBG-DR funds allocated through Federal Register Notice in response to Federally Declared Disasters in 2019. This notice states that Citizen Participation is to follow the requirements for the Federal Register Notice issued August 14, 2018 (83 FR 40314). The Federal Register Notice waives regular citizen participation requirements and states requirements for notifying the public regarding use of the disaster CDBG funds (CDBG-DR).

CDBG-DR CITIZEN PARTICIPATION WAIVER (83 FR 40314, AUGUST 14, 2018)

Citizen participation waiver and alternative requirement. To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, and 24 CFR

91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. The streamlined requirements do not mandate public hearings but do require the grantee to provide a reasonable opportunity (at least 30 days) for citizen comment and ongoing citizen access to information about the use of grant funds. The streamlined citizen participation requirements for a grant under this notice are:

Publication of the action plan, opportunity for public comment, and substantial amendment criteria. Before the grantee adopts the action plan for this grant or any substantial amendment to the action plan, the grantee will publish the proposed plan or amendment. The manner of publication must include prominent posting on the grantee's official website and must afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan or amendment's contents. The topic of disaster recovery should be navigable by citizens from the grantee's (or relevant agency's) homepage. Grantees are also encouraged to notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

#### **Schedule of Public Engagements**

The State of Missouri will use two primary means to engage citizens for their comments on the 2019 CDBG-DR Action Plan. The two means are Website and Public Meetings.

##### **1. Website Public Comment**

On July 30, 2020 the State of Missouri's 2019 CDBG-DR Action Plan was posted for public comment on the Department of Economic Development website <https://ded.mo.gov/content/community-development-block-grants>, (ded.mo.gov – Community Development Block Grant Disaster Recovery).

Comments regarding the CDBG-DR Action Plan were accepted through August 29, 2020. Comments were accepted at the CDBG-DR email address: MOCDBG-DR@ded.mo.gov. Comments could also be mailed to the Missouri Department of Economic Development, 301 W. High Street, P.O. Box 118, Jefferson City, MO 65102.

During the public comment period held July 30 through August 29, 2020, CDBG-DR received 102 comments. See ANNEX C for public comments and CDBG-DR response during this comment period.

On **November 20, 2020** the State of Missouri's 2019 CDBG-DR Action Plan was posted for a second public comment period on the Department of Economic Development website <https://ded.mo.gov/content/community-development-block-grants>, (ded.mo.gov – Community Development Block Grant Disaster Recovery).

Comments regarding the CDBG-DR Action Plan were accepted through **December 22, 2020**. Comments were accepted at the CDBG-DR email address: MOCDBG-DR@ded.mo.gov. Comments could also be mailed to the Missouri Department of Economic Development, 301 W. High Street, P.O. Box 118, Jefferson City, MO 65102.

During the public comment period held November 20 through December 22, 2020, CDBG-DR received 0 comments.

## **2. Public Meetings**

The State of Missouri will conduct virtual Meetings using WebEx. The dates for these Meetings are:

- August 19, 2020
- August 20, 2020
- August 25, 2020
- August 26, 2020 citizen engagement with Holt County MID

Per the Federal Register's streamlined approach for CDBG-DR, public hearings are not required during the 30-day comment period. The State of Missouri feels that Virtual Public Meetings are warranted for the purposes of more comprehensive public involvement and understanding.

All public meetings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency (LEP). The virtual public meetings will be promoted through a statewide press release, posting on the CDBG-DR website and notices placed in newspapers in geographic proximity to the location of the hearing for at least 10 business days prior to the hearing.

Public notification of the Public Meeting will be emailed via DED Communications and will be posted at <https://ded2.mo.gov/programs/cdbg/disaster-recovery>. This notice indicates that public meetings will be held virtually (via WebEx).



# STATE OF MISSOURI CITIZEN PARTICIPATION PLAN FOR STATE CDBG, CDBG-CV, CDBG-DR, AND CDBG-MIT

## 1. Purpose

The State of Missouri has adopted a Citizen Participation Plan (CPP) that sets forth the State's procedures for citizen participation in the development and implementation of HUD-funded activities and programs. The development of Action Plans, Consolidated Plans, and Substantial Amendments to the Consolidated Plan and Action Plans for State CDBG, CDBG-CV, CDBG-DR, and CDBG-MIT, and the Assessment of Fair Housing (AFH) will require public notice and engagement.

The State of Missouri constructed a thorough CPP that encourages citizens to participate in the development of the following:

- Five-Year Consolidated Plan (State HUD Programs)
- Annual Action Plans and Substantial Amendments (State HUD Programs)
- Action Plans and Substantial Amendments for COVID-19 (State CDBG-CV Programs)
- Assessment of Fair Housing
- Mitigation Action Plan (CDBG-MIT Programs)
- Disaster Recovery Action Plan (CDBG-DR Programs)

The Citizen Participation Plan was developed in accordance with the requirements listed in 24 CFR Part 91.115 (Citizen Participation Plan for States) and HUD requirements contained in the related Federal Register Notices allocating funds for disaster recovery and mitigation. These requirements are designed to encourage participation by LMI persons, particularly those living in blighted areas and/or disaster impacted communities, and those living in areas where CDBG, CDBG-DR, and CDBG-MIT funds are proposed to be used. The plan provides citizens (including minorities, disabled, and persons with limited English proficiency); units of local government, tribes, Continuums of Care, organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations); and other interested parties with a reasonable opportunity to comment on the plan and encourages them to do so.

## 2. Outreach

The Missouri Department of Economic Development (DED), as the Lead Agency for the State of Missouri HUD grants, will ensure that HUD requirements for citizen engagement are met. Prior to release and following publication of any plan (Draft Consolidated Plan, Action Plans, or AFH), the State will use several techniques to encourage a shared vision of change for the community and the review of program performance. The techniques are clarified throughout the Citizen Participation Plan. In summary, they include the following:

- Informational Meetings and Public Hearings
- Webinars
- Postings on DED and Missouri Housing Development Commission (MHDC) websites
- DED and MHDC community emails
- Notices provided to local governments and other local partners via Missouri's RPCs/COGs, the Missouri Municipal League, and the Missouri Association of Counties

The Disaster Recovery and Mitigation Action Plans will also be supported by the following:

- Postings and notices on the DED website

- Formation of one or more Citizen Advisory Committees
- Formal invitation to key stakeholders, including any separate agency of the jurisdiction that is responsible for the development of the FEMA Hazard Mitigation Plan, including the State Hazard Mitigation Officer

The State of Missouri will make the CPP available to the public to offer its citizens and UGLGs with a reasonable opportunity to comment on the CPP and any subsequent substantial amendments.

### **3. Citizen Participation Plan and Accessibility for CDBG, CDBG-CV, CDBG-DR, AND CDBG-MIT**

To ensure that minorities and persons with disabilities have prior notice and access to the public hearings, DED will take the following actions:

- Announce public hearings to organization that represent minorities and persons with disabilities at least 10 days prior to the public hearing date(s).<sup>62</sup>
- Include a statement in public hearing notices indicating that attendees may request language interpretation to assist with their participation.
- Include a statement in public hearing notices that the location of the meeting is accessible to persons with physical disabilities.
- Include a statement in public hearing notices that attendees can request reasonable accommodations from the State in order to participate in the meeting.
- Notify organizations representing minorities that every reasonable effort will be made to translate documents, including access to Google Translate on the State’s website.

Residents who require special accommodations to attend the hearing should contact the State by emailing Marcy Mealy, mocdbg@ded.mo.gov and/or calling 1-800-253-0609 to make advance arrangements. For hearings that are held in areas that meet the minimum threshold for limited English proficiency (LEP) accommodations, translations will be provided.

DED provides guidance to its units of local government (UGLG) on developing a local language access plan (LAP). This guidance is provided as Attachment A of this document. Provisions for interpretation shall be made for LEP residents to encourage and ensure meaningful access to participation for public hearings, communication materials, websites, and public comments.

### **4. Regular State CDBG Consolidated Plan and Annual Action Plan – Public Notice and Comment Period**

Every 5 years, the State of Missouri completes a Consolidated Plan for its HUD-funded programs. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific Federal and non-Federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Before the State adopts the Consolidated Plan, residents, public agencies, and other interested parties are given access to information about the programs involved in the plan, including the following:

- Amount of assistance the State expects to receive
- Range of activities that may be undertaken, including the estimated amount that will benefit LMI persons
- Plans to minimize the displacement of persons and to assist any persons displaced

Prior to beginning the Consolidated Plan or Annual Action Plan process, the State will hold a meeting to inform the public and interested parties about the upcoming Consolidated Plan/Action Plan process approximately 45 days prior to the release of the draft plans each year.

The State will provide notice of this meeting via the following methods:

- Notice posted on DED and Missouri Housing Development Commission websites
- Notices provided to local governments and other local partners via Missouri's RPCs/COGs, the Missouri Municipal League, and the Missouri Association of Counties
- DED community group emails (approximately 4,000 communities and community organizations statewide)
- Missouri Housing Development Commission community group emails
- State's public housing agencies
- Missouri Commission on Human Rights
- State's community action agencies

### ***Publishing the Plan with Reasonable Opportunity for Public Review***

The State will make every effort to publish the proposed Consolidated Plan in a manner that affords residents, UGLGs, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments.

### ***Website***

To notify the public about the plan's availability, DED will post the CDBG Consolidated Plan and subsequent Annual Action Plans on the State CDBG web page at [www.ded.mo.gov](http://www.ded.mo.gov).

Additional public notification is provided via newsletter, press release, direct email, and through partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan and a schedule of upcoming public hearings are sent to other partner State agencies via email to identify the locations where the plans will be available for review. The announcement will also explain that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments. The State will provide a free copy of the plans to interested parties upon request and will make the plan available during the hearings. A press release will be issued statewide, notifying the public about the Action Plan or Consolidated Plan process, the opportunity to review the plan, and the schedule of public hearings.

### ***Public Hearings***

The State will conduct at least one "in-person" public meeting in Jefferson City during the 30-day comment period<sup>63</sup> and will conduct another public meeting via webinar. Instructions on joining a webinar will be provided in the public hearing notices.

All public hearings will be scheduled at times and locations most likely to make it possible for the majority of impacted persons to attend without undue inconvenience. Hearings will be held at locations that meet the Americans with Disabilities Act requirements. All hearings will be promoted through a statewide press release, posting on the CDBG website, and notices placed in newspapers in geographic proximity to the location of the hearing.

### ***Time Period for Comments***

The State provides approximately 30 days to receive comments from residents and units of local government on the plans (Consolidated Plan, Action Plan, and AFH). During that period, the State

schedules at least four public hearings around the State to present the content of the plan (Consolidated Plan, Action Plan, and AFH) and receive and record comments from the public.

The plan will be available on the DED website at [www.ded.mo.gov](http://www.ded.mo.gov) and the MHDC website at [www.mhdc.com](http://www.mhdc.com).

### ***Consideration of Public Comments***

The State considers any comments or views of residents and UGLGs received in writing or orally at the public hearings, and also during the 30-day comment period in preparing the final consolidated plan. A summary of these comments, including those not accepted and the reasons, will be attached to the final AFH, Action Plan, or Consolidated Plan.

### ***Substantial Amendment***

Substantial amendments to either the Action Plan, Consolidated Plan, or AFH requires public notice. The thresholds for a substantial amendment are as follows:

- Action Plan or Consolidated Plan – An amendment shall be considered substantial (requiring public notification and a comment period) in the following events:
  - Adding a new funding source to the plan
  - Annual allocations from HUD differ more than 10% of the projected amount
  - New funding category is created or more than 25% of the annual allocation is transferred between funding categories for the CDBG program
- Assessment of Fair Housing (AFH) – An amendment shall be considered substantial (requiring public notification and a comment period) in the following events:
  - A material change in circumstances that affects the information on which the AFH is based. Examples include, but are not limited to, a Presidentially Declared Disaster event that is of such a nature to impact the steps required to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the State’s jurisdiction; and civil rights findings, determinations, settlements, or court orders.

The State will provide public notice of substantial amendments to the plan and the subsequent hearings via the following methods:

- Notice posted on DED website at [www.ded.mo.gov](http://www.ded.mo.gov) and the MHDC website at [www.mhdc.com](http://www.mhdc.com)
- Notices provided to local governments and other local partners via Missouri’s RPCs/COGs, the Missouri Municipal League, and the Missouri Association of Counties
- DED community group emails (approximately 4,000 communities and community organizations statewide)
- Missouri Housing Development Commission community group emails
- State’s public housing agencies
- Missouri Commission on Human Rights
- State’s community action agencies

The State provides approximately 30 days to receive comments from residents and units of local government on the substantial amendments of the plan (Consolidated Plan, Action Plans, and AFH).

Written comments may be submitted by mail at **P.O. Box 118, Jefferson City, MO 65109** and/or email at [mocdbg@ded.mo.gov](mailto:mocdbg@ded.mo.gov) at any time during the public comment period, and may be directed to any of the

State participating agencies (departments of Economic Development, Health and Senior Services, and Social Services) and the Missouri Housing Development Commission.

The State considers any comments or views of residents and UGLGs received in writing or orally at the public hearings in preparing the substantial amendment of the plans (Consolidated Plan, Action Plans, and AFH). A summary of these comments, including those not accepted and the reasons, will be attached to the final AFH, action plan, or consolidated plan.

### ***Performance Reports***

The State provides reasonable notice and an opportunity to comment on performance reports made by the programs involved with the Consolidated Plan and the Annual Action Plan. Data contained in the performance reports are compiled and sent out approximately 2 months after the end of the program year. The program year associated with the Consolidated Plan ends on March 31 of each year.

Copies of the actual performance reports are available electronically, posted on the CDBG website, and notice of the posting is sent to 20 public agencies around the State. The public is provided with a 30-day comment period and may submit written comments by mail at **P.O. Box 118, Jefferson City, MO 65109** and/or email at [mocdbg@ded.mo.gov](mailto:mocdbg@ded.mo.gov) at any time during the public comment period.

Comments received on the performance reports are recorded, and a summary of the comments is attached to the performance report, which is submitted no later than June 1 for the Consolidated Plan.

### ***Requirements for Local Governments Receiving State CDBG Funds***

Local government recipients of CDBG funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570 and Chapter 610 of Missouri's Open Record Law. 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, with the exception of confidential matters related to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to group's representative of LMI persons 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.

Residents shall be provided with adequate and timely information to enable them to be meaningfully involved in important decisions at various stages of the program, including the following.

### ***Two Public Hearings Required***

The public hearing requirements must address the items below:

- Determination of needs.
- Review of proposed activities.
- Review of past program performance.

Public Hearing Requirements:

- a. 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 impacted 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 recipient performance 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.

- b. Notification of any and all hearings shall be given a minimum of 5 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.
- c. All hearings must be accessible to persons with disabilities. Provisions for interpretation shall be made at all public hearings for LEP residents if such residents are expected to be in attendance.

### ***Action Plan Availability to the Public***

The State will provide the Consolidated Plan and Annual Action Plan, as adopted; substantial amendments; and the performance reports to the public. These documents are made available to the public electronically at [www.ded.mo.gov](http://www.ded.mo.gov) and the MHDC website at [www.mhdc.com](http://www.mhdc.com).

The Action Plan and substantial amendments are made available at public hearings. All documents related to the Consolidated Plan are available upon request and will be provided to anyone requesting them. Materials will be provided in a form accessible to persons with disabilities or limited English proficiency (LEP) upon request. Requests may be made by email to Candace Buford at [mocdbg@ded.mo.gov](mailto:mocdbg@ded.mo.gov) or by calling 1-800-253-0609.

### ***Access to Records***

Residents, public agencies, and other interested parties are given reasonable and timely access to the information and records related to the State's CDBG Action Plan and the State's use of assistance under the programs covered by the plan per 24 CFR 570.508. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials from the previous 5 years are available to the public upon request. Requests may be made by email to [mocdbg@ded.mo.gov](mailto:mocdbg@ded.mo.gov) or by calling Candace Buford at 1-800-253-0609.

### ***Complaints***

Citizens who wish to voice a complaint related to the published Action Plan, any substantial amendments to the Action Plan, performance reports, or other issues

#### **Complaints should be sent in writing to:**

Candace Buford, Program Coordination Specialist  
P.O. Box 118  
Jefferson City, MO 65109  
Email: [mocdbg@ded.mo.gov](mailto:mocdbg@ded.mo.gov)  
Phone: 1-(800) 253-0609

DED will provide a timely, written response to all written citizen complaints. The response to a complaint will be provided within fifteen (15) business days of receipt of the complaint.

**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](mailto:hotline@hudoig.gov)).**

Complaints regarding accessibility can be reported to the State’s 504 Coordinator. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

**STATE 504 ACCESSIBILITY COORDINATOR:**

Amy Werner, Compliance Specialist  
MO Department of Economic Development  
301 W. High Street, Suite 700  
P.O. Box 118  
Jefferson City, MO 65102  
Email: [state504@ded.mo.gov](mailto:state504@ded.mo.gov)  
Phone: (573) 751-2039

## **CITIZEN PARTICIPATION PLAN**

The State will follow the Citizen Participation Plan in full and to the extent possible, as described herein.

### **State CDBG 2019/2020 CARES Act Flexibilities**

DED will implement the following guidance from HUD regarding new flexibilities under the CARES Act. The Coronavirus Aid, Relief and Economic Security Act (CARES Act, Public Law 116-136) makes available \$5 billion in supplemental CDBG funding for grants to prevent, prepare for, and respond to coronavirus (CDBG-CV grants). In addition, the CARES Act provides CDBG grantees with flexibilities that make it easier to use CDBG-CV grants and fiscal years 2019 and 2020 CDBG grants for coronavirus response, and authorizes HUD to grant waivers and alternative requirements.

HUD has advised grantees (including the State of Missouri) to amend or prepare their plans as soon as possible and not to wait for the pending Federal Register Notice, which may provide additional waivers and alternative requirements. Similarly, grantees should not wait for HUD to allocate the remaining nearly \$3 billion of the \$5 billion provided by the CARES Act for the CDBG program. Upon publication of the Federal Register Notice and subsequent allocations, grantees receiving allocations will then amend their plans accordingly.

To expedite grantees' use of CDBG-CV funds, HUD is waiving the requirements at 42 U.S.C. 12705(a)(2) to the extent that it requires updates to the housing and homeless needs assessment, housing market analysis, and strategic plan, and 24 CFR 91.220 and 91.320 to the extent that the action plan is limited to a specific program year to permit grantees to prepare substantial amendments to their most recent annual action plan, including their 2019 annual action plan. Grantees must identify the proposed use of all funds and how the funds will be used to prevent, prepare for, and respond to coronavirus.

DED is also waiving 24 CFR 91.505 to facilitate the use of the CDBG-CV funds to the extent necessary to require submission of the substantial amendment to HUD for review in accordance with 24 CFR 91.500. To receive a CDBG-CV grant, a grantee must also submit SF-442, SF-424D, and the certifications at 24 CFR 91.225(a) and (b) or 24 CFR 91.325 (a) and (b).

Citizen Participation and Public Hearings for Consolidated Plans (including Action Plans)<sup>72</sup>

<b>Description of Program Flexibility</b>	<b>Applicability to CDBG-CV and CDBG Grants</b>		
Provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans.	CDBG-CV	Immediately Available	
	CDBG FY 19 and FY 20		



<p>Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and amended citizen participation plans.</p> <p>In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee’s certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.</p>	<p>CDBG Grants before FY 19</p>		<p>Not Available</p>
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***Time Period For Comments***

The State will provide a minimum of 5 days for public comments for substantial amendments to the 2019/2020 CDBG Action Plans when using CDBG funds to respond to public health emergencies caused by COVID-19.

***Consideration of Public Comments***

The State considers any comments or views of residents and UGLGs received during the public comment period. A summary of these comments, including those not accepted and the reasons, will be attached to the final Action Plan or Consolidated Plan.

***Public Hearings***

Public hearings are not required for these funds. However, if the State were to determine that a public hearing would be in the best interests of the State and its residents, the public hearing will be held virtually and in compliance with the guidance above.

**State CDBG-CV Action Plan and Amendments (TBD)**

Further waivers or alternative requirements will be announced in the Federal Register Notice for the CARES Act and will detail specific requirements for CDBG-CV. Until further direction is provided by HUD, CDBG-CV public participation will follow the guidance above.

**CDBG-DR ACTION PLANS - PUBLIC NOTICE AND COMMENT PERIODS**

The State of Missouri is also the recipient of HUD CDBG-DR funds allocated through Federal Register Notices in response to Federally Declared Disasters in 2017 and 2019. These notices state that Citizen Participation is to follow the requirements for the Federal Register Notice issued August 14, 2018 (83 FR 40314). The Federal Register Notice waives regular citizen participation requirements and states requirements for notifying the public regarding use of the disaster CDBG funds (CDBG-DR).

## CDBG-DR ACTION PLAN

DED will post the draft CDBG-DR Action Plan or any Substantial Amendment for at least 30 days of public comment on the CDBG-DR website: <https://ded2.mo.gov/programs/cdbg/disaster-recovery>. Notice of all hearings will be posted a minimum of 10 business days prior to public hearings.

The state makes every effort to publish the draft CDBG-DR 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. The plan will remain available on the DED website <https://ded2.mo.gov/programs/cdbg/disaster-recovery>.

To notify the public of the plan's availability, public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan is 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 will also provide a copy of the plans to interested parties upon request.

- 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 CDBG-DR Action Plan. A summary of these comments, including those not accepted and reasons, therefore, will be attached to the final CDBG-DR Action Plan.

## HUD MOST IMPACTED AND DISTRESSED AREAS

HUD identified the following areas as Most Impacted and Distressed Areas (MIDs) for Missouri's 2019 DR-4451 Disaster: St. Charles County, Zip Code 64437 (Holt County) and Zip Code 65101 (Cole County).

## STATE MOST IMPACTED AND DISTRESSED AREAS

The State of Missouri has identified Cole, Holt and St. Charles Counties as State MID Counties.

## ANNEX C.

### STATE OF MISSOURI 2019 CDBG-DR PUBLIC COMMENTS & RESPONSES

#### Consideration of Comments

The State considers any comments or views of residents and units of general local government received in writing or orally in preparing the final CDBG-DR Action Plan. A summary of these comments will be attached to the final Action Plan or Substantial Amendment.

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

Missouri Comment Summary					
Delivery Method	Designation	# of Comments	Location	Category	Sub Category
Email	Resident/Local Government	4	Craig	Allocations Request	Additional Activity; Confusion on tie back to Disaster Damage
Email	Local Government	1	Jefferson City	Allocations Request	Request for Additional Activities
Email	Non-For-Profit	4	St Charles,	Allocations Request	Flexible use of funding for housing activities
Email	Non-For-Profit	1	ICCSAFE	Citizen Comment	Consistency and implementation of building codes
Mailed & Emailed	Non-For-Profit	92	Mound City	Allocations Request	Non-Federal Cost Share Match
<b>Total Comments</b>		102			

Date Received	Designation	# of Comments	Location	Category	Sub Category	Comment	Response
Email	Resident/Local Government	4	Craig, Holt County	Allocations Request	Infrastructure Activity; Confusion on tie back to Disaster Damage	<p>Is there any waiver DED can request HUD to include DR-4435 in the DR-4451 Action Plan? I question the methodology because the flooding to The City of Craig, Holt County Zip code 64437 residents and businesses did not occur on the incident date set by FEMA for the DR-4451 but did occur in March of 2019. 1) Housing Rehabilitation for non-federal match for Affordable Multifamily Rental Housing to meet housing needs.</p> <p>2) Infrastructure recovery and restoration for water and wastewater systems to meet housing needs in the most impacted and distressed areas. 3) Permanent Levee construction to protect the most impacted and distressed areas to meet the housing needs in order to build the economic growth. 4) Demolition only of housing that are not feasible to rehabilitate or rebuild to address slum and blight of unmet housing needs. All activities listed above are needed to address long-term recovery and restoration of housing in the most impacted and distressed areas.</p>	<p>We are pleased to inform you that we have added an Infrastructure Activity to the Action Plan in an effort to promote economic revitalization by protecting businesses and address the need for protecting citizens and their homes.</p> <p>DED is currently inquiring with HUD for allowance to reach back to DR - 4435 for the reasons you noted.</p>
Email	Local Government	1	Jefferson City	Allocations Request	Public Improvements Activity	<ul style="list-style-type: none"> <li>• Rehabilitation - The neighborhoods that were most impacted were low-moderate income pre-disaster. The housing that remains unrepaired would benefit if rehabilitation was an eligible activity.</li> <li>• Homeownership Assistance - As a Community Development Block Grant Entitlement Community, the City of Jefferson offers a down payment incentive program. Roughly 20-30 first time homebuyers are incentivized by the program each year. The program is popular and generally runs out of funds halfway through the funding cycle. Due to the number of residents that were displaced after the tornado, it would be advantageous to offer this incentive to neighborhoods and/or individuals that were directly impacted by the disaster. The City of Jefferson already has the programming capability to offer this incentive should this be offered as an eligible activity.</li> <li>• Public Improvements – Much of the City’s streets, curbs, and sidewalks were heavily damaged during the debris removal process. Repair of this infrastructure would reconnect neighborhoods with schools, parks, transportation, employment, and other amenities if public improvements were an eligible activity.</li> <li>• Acquisition and Demolition – The City of Jefferson would like to be eligible for purchasing and demolishing structures. Immediate reconstruction would be the goal, but may not be feasible in every</li> </ul>	<p>Thank you for your input on the CDBG-DR 4451 Action Plan during our public comment period. In response to your comments, rehabilitation, down payment assistance, acquisition and demolition, and planning activities were all added to the CDBG-DR 4451 Action Plan.</p> <p>We hope these additions will enable the City of Jefferson to reach more citizens and create greater flexibility in impacted neighborhoods.</p>

						<p>instance. The existence of remaining heavily damaged structures may threaten a neighborhood as it tries to recover.</p> <ul style="list-style-type: none"> <li>• Planning – The City of Jefferson would benefit from a long-term recovery plan to determine the health of impacted neighborhoods and how to best utilize resources in the future.</li> </ul>	
Email	Non-For-Profit	4	St Charles	Allocations Request	Multifamily Housing	<p>Affordable housing options for low-income residents are our number one priority, and these disaster recovery funds can provide the support needed to increase these options and move people out of harm's way. We strongly recommend that Missouri Department of Economic Development give St. Charles County maximum flexibility on the use of CDBG disaster funds to support the preservation and development of affordable housing. Flexibility to spend funds for housing needs beyond flood plain buyouts is essential to help create new opportunities for the County to partner on affordable housing. I write this letter to you in support of affordable housing for displaced residents seeking disaster recovery funds. St. Charles County is slated to receive \$15 million in Disaster Recovery Funds from the 2019 flooding.</p>	<p>Thank you for your input on the CDBG-DR 4451 Action Plan during our public comment period. In response to your comment, we have added activities to the 2019 CDBG-DR Action Plan that include Acquisition and Construction of New Affordable Housing (for purchase and rental), Affordable Multifamily Housing, and Infrastructure to support housing recovery efforts and affordable housing.</p> <p>We hope these additions will enable maximum flexibility in order to use the funds to support the preservation and development of additional affordable housing in St. Charles County and will allow for safe, health, and affordable housing obtainable for all.</p>
Email	Non-For-Profit	1	ICCSAFE	Citizen Comment	Consistency and implementation of building codes	<p>The Code Council also strongly encourages use of CDBG-DR funds for improved code enforcement, including training and certification, as code strong enforcement alone provides 15% to 25% in loss avoidance, in addition to the benefits provided by the underlying adopted codes. Investments in training and certification can lead to insurance savings and can make jurisdictions in the state more competitive for FEMA grants.</p>	<p>Thank you for your input on the CDBG-DR 4451 Action Plan during our public comment period.</p> <p>DED supports the recommendations and professional suggestions outlined by the International Code Council. The State of Missouri continues to encourage Units of Local Government to support such efforts for their own increased</p>

							<p>resilience to disasters and elimination of long term risk to loss of life, injury, damage, and property.</p> <p>We thank you for serving as a resource to Missouri and to our Local Governments; we agree that together, consistency of building codes and the implementation of such codes will result in the safety and latest hazard-resistant designs for our state.</p>
Mailed & Emailed	Non-For-Profit	92	Mound City	Allocations Request	Non-Federal Cost Share Match	<p>We are requesting state offers activity to assist housing to pay my matching funds. Mound City Housing Authority is a low income based apartment complex that was flooded on May 28, 2019. We have 42 apartments, with 35 being flooded that need rehabbed. Our maintenance buildings and office/community room were flooded as well and all furniture and appliances and most of our tools in the two buildings were lost. We have worked with FEMA and now SEMA and they will pay 75% of the rehab but we cannot find financing for the 25% at this time. We have rehabbed the two maintenance buildings and are presently working on the office and community room. Mound City, which is in Holt County, has been devastated by the flooding and in desperate need of low income housing. Thank you for the consideration.</p>	<p>Thank you for your input on the CDBG-DR 4451 Action Plan during our public comment period. Our team received 91 comments from interested individuals in Mound City; in response to the comments, the affordable rehabilitation activity may be utilized in providing funds for the non-federal share match.. CDBG-DR funds will be eligible to provide up to 25% of the local or flexible match under projects linked to Housing Recovery.</p> <p>We hope this will better enable Mound City to provide low income housing as well as respond and recover from the 2019 disaster.</p>

## **ATTACHMENT B:**

### **STATE OF MISSOURI WEBSITE POLICIES AND PROCEDURES FOR CDBG-DR AND CDBG-MIT**

#### **1. Website Purpose**

The State of Missouri is currently creating and will maintain comprehensive websites for the U. S. Department of Housing and Urban Development (HUD)), Community Development Block Grant -Disaster Recovery (CDBG-DR) in accordance with HUD requirements, as cited in Federal Register Notice, 83 FR 5844, February 9, 2018 (Prior Notice for 83 FR 40314, August 14, 2018, which allocated \$58,535,000 of CDBG-DR funds to Missouri). CDBG-DR funds must be used to address unmet needs (with a priority focus on housing) that can be tied-back to the 2017 disasters declared under DR-4317. Federal Register Notice, 85 FR 4681, January 27, 2020 which allocated \$30,776,000 of CDBG-DR funds for disasters declared under DR-445.

Concurrently, the Missouri Department of Economic Development (MO DED) will also create and maintain a CDBG Mitigation (CDBG-MIT) web page linked to the CDBG-DR web page in accordance with Federal Register Notice 84 FR 45838, August 30, 2019. CDBG-MIT funds must be used to address mitigation risks identified in the CDBG-MIT Action Plan. All CDBG-MIT activities must address the mitigation of future disasters.

The websites serve as a central source for CDBG-DR and CDBG-MIT information and are intended to provide transparency into the State of Missouri's disaster recovery activities using these funds. The website will host Action Plans and Amendments; Citizen Participation Policies; Public Hearing Notices; CDBG-DR and CDBG-MIT Program policies, eligibility requirements, and steps to apply for funding; procurement policies, solicitations, and awarded contracts (including those procured by subrecipients); procedures for complaints, appeals, and fraud reporting; Quarterly Performance Reports; expenditure projections and outcomes; and for CDBG-MIT, information on the Citizens Advisory Group for Mitigation.

The Lead Agency (i.e., Grantee) for Missouri's CDBG-DR and CDBG-MIT allocations has been designated as MO DED. This department is also the Lead Agency for the State's annual CDBG allocation. DED currently manages websites associated with the State's CDBG program.

#### **2. Website Content**

The DED website address for CDBG-DR is located: <https://ded2.mo.gov/programs/cdbg/disaster-recovery>

The DED website address for CDBG-MIT is located: <https://ded2.mo.gov/programs/cdbg/mitigation>

Each program page will have links to its counterpart (i.e., the CDBG-DR page will link to the CDBG-MIT page and vice versa).

Website locations will be printed on all program advertisements and outreach materials. The State of Missouri adheres to ADA- compliant standards for website accessibility and readability. Content and website layout will be designed with best practices for adaptive use in mind. The State supports accommodations for persons with limited English proficiency (LEP) and will publish program documents in languages based on the needs of the community.

The information that will be available for CDBG-DR on the DED website will include, but may not be limited to, the following:

#### **CDBG-DR Requirements**

- CDBG-DR Unmet Needs Assessment
- CDBG-DR Action Plan and Amendments
- CDBG-DR Announcements of Public Hearing(s)
- Citizen Participation Plan
- Accessibility and LEP requirements
- Information on each CDBG-DR program, eligibility requirements, and steps to apply
- CDBG-DR Appeals Procedure
- CDBG-DR Citizen Complaint Procedures
- List of all CDBG-DR Sub-Recipients and Contractors
- CDBG-DR Procurement
  - Procurement Policies
  - Current RFPs
  - Eligibility for competitive sub-awards (if applicable)
  - Awarded contracts and sub-recipient contract summary
- CDBG-DR Quarterly Performance Reports (QPR)
- A link to CDBG-MIT web page
- Additional reporting as required by HUD

#### **CDBG-MIT Requirements**

The information on the CDBG-MIT web page will include but may not be limited to:

- CDBG-MIT Risk Assessment
- CDBG-MIT Action plans and amendments
- CDBG-MIT Announcements and Public Hearings
- Citizen Participation Plan
- Accessibility and LEP requirements
- Information on each CDBG-MIT program, eligibility requirements, and steps to apply
- CDBG-MIT Appeals Procedures
- CDBG-MIT Citizen Complaint Procedures
- List of all CDBG-MIT Sub-Recipients and Contractors
- CDBG-MIT Procurement

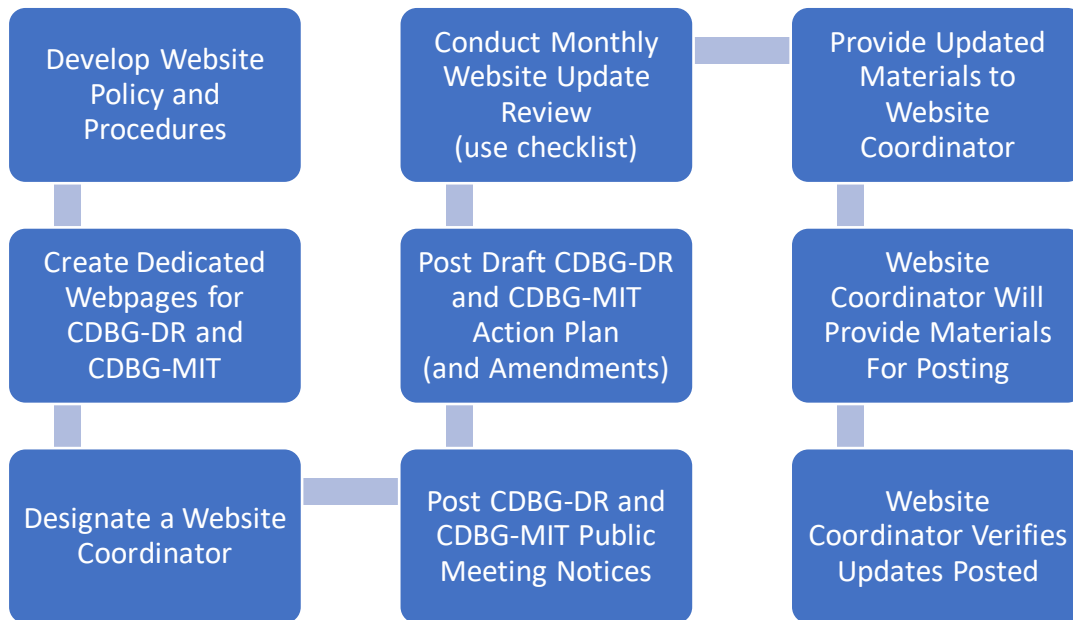


- Procurement Policies
- Current RFPs
- Eligibility for competitive sub-awards
- All awarded contracts to be paid with CDBG-MIT
- CDBG-MIT Quarterly Performance Reports
- CDBG-MIT Statistics/graphics displaying expenditures and outcomes to date and projections
- A link to the CDBG-DR web page
- Additional reporting as required by HUD
- Information on the Citizen’s Advisory Group for Mitigation

**3. WEBSITE PROCESS**

DED Website Coordinator will ensure that the CDBG-DR and CDBG-MIT webpages are reviewed monthly and updated as required by this website policy. The Website Coordinator will use the Monthly Website Update Checklist to complete the review. The website will be reviewed on the 30<sup>th</sup> of each month and updated materials will be posted by the 15<sup>th</sup> of the following month.

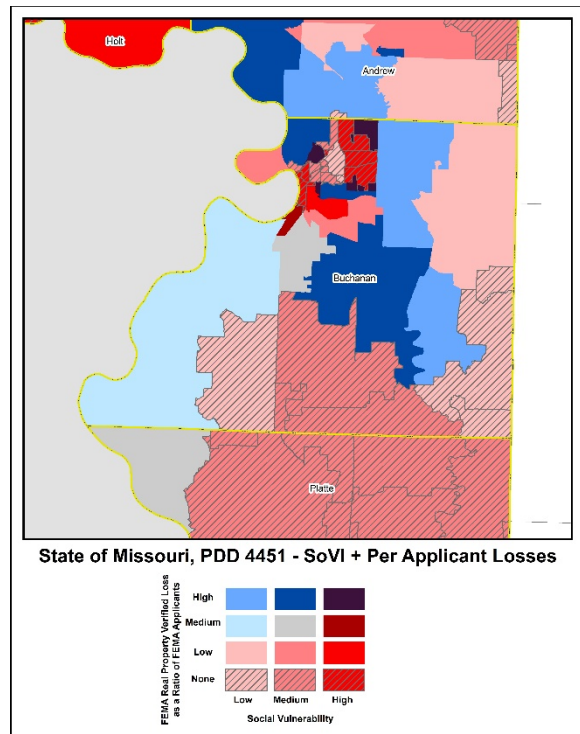
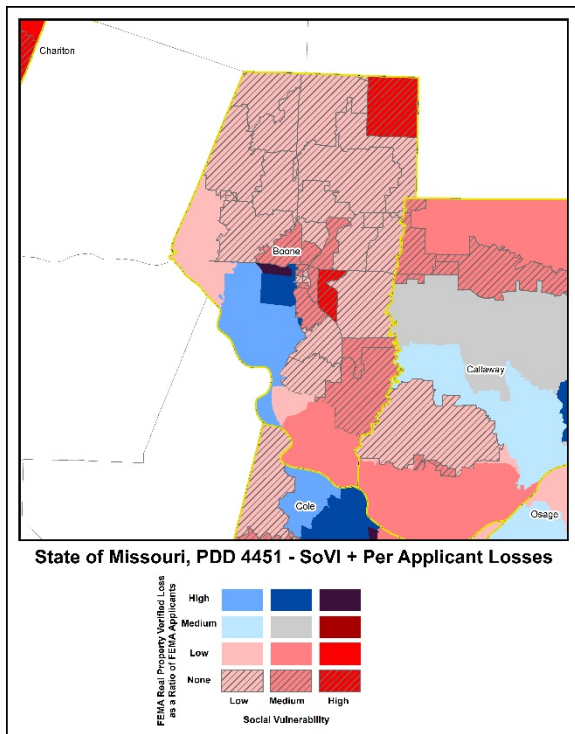
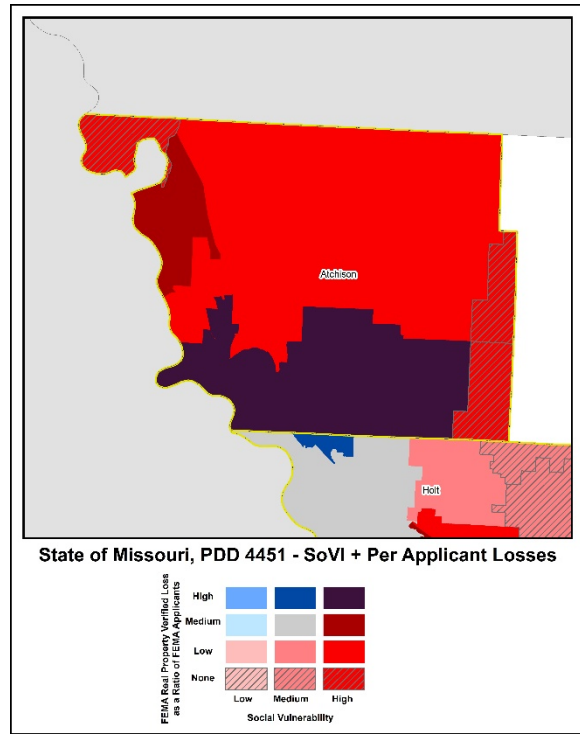
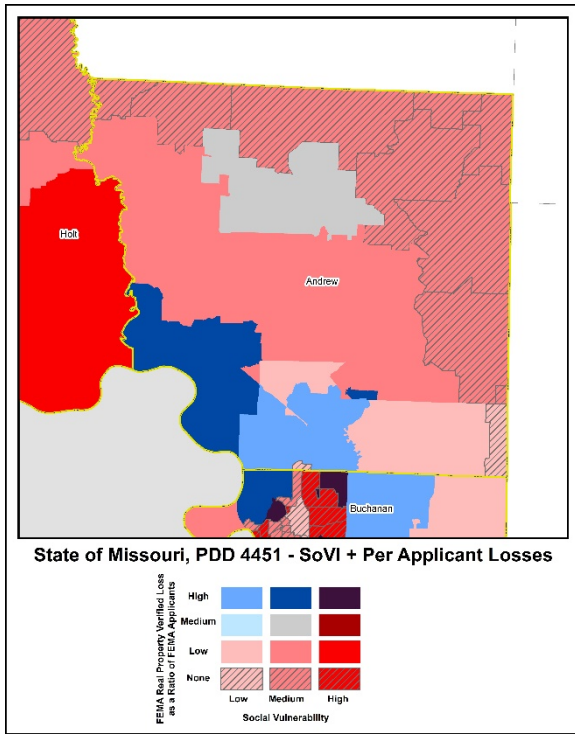
**WEBSITE DEVELOPMENT AND ADMINISTRATION PROCESS**

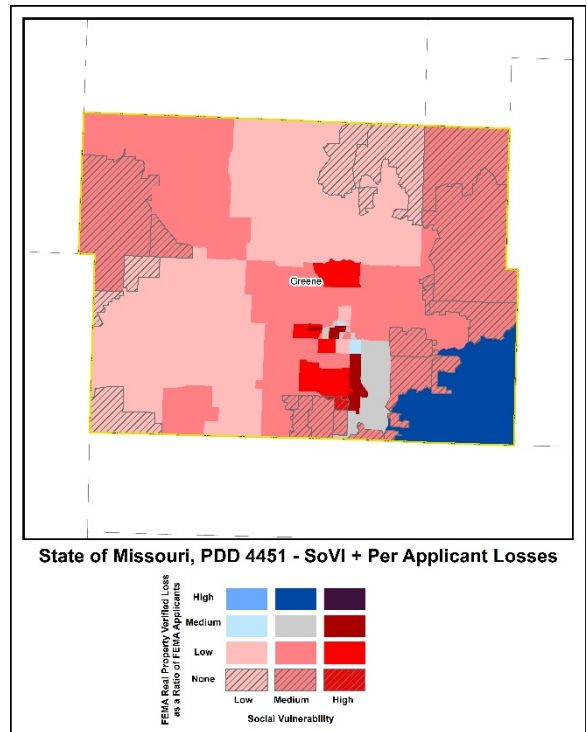
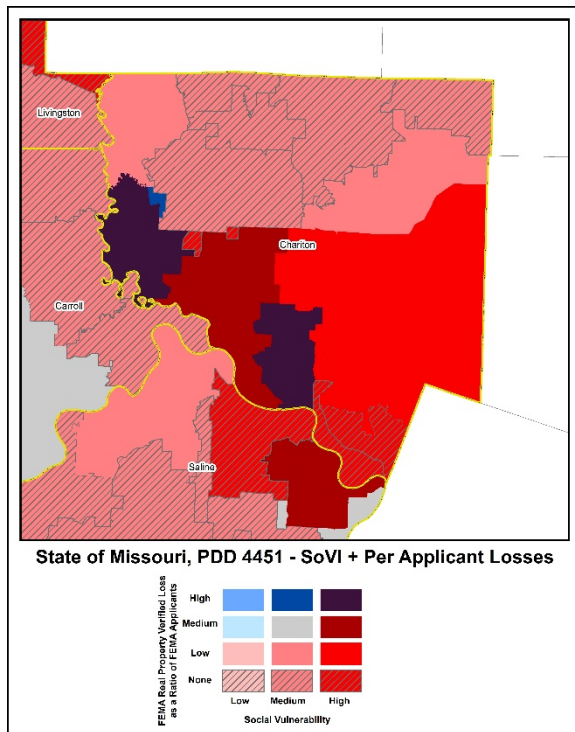
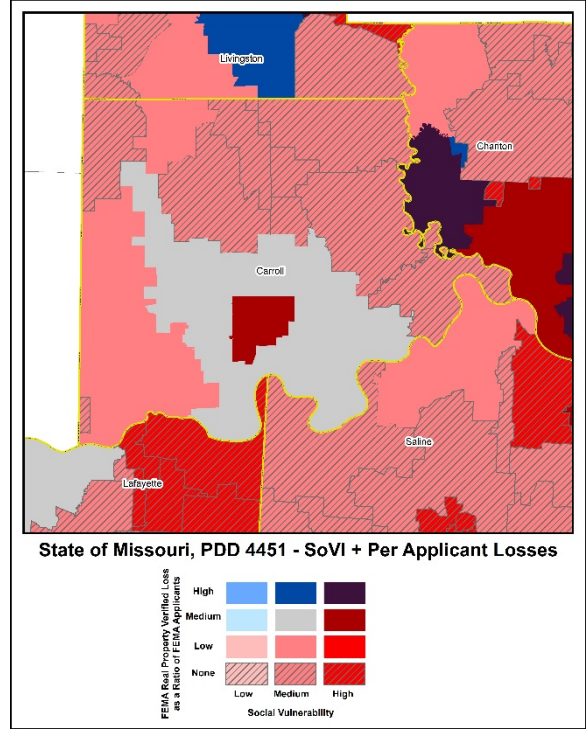
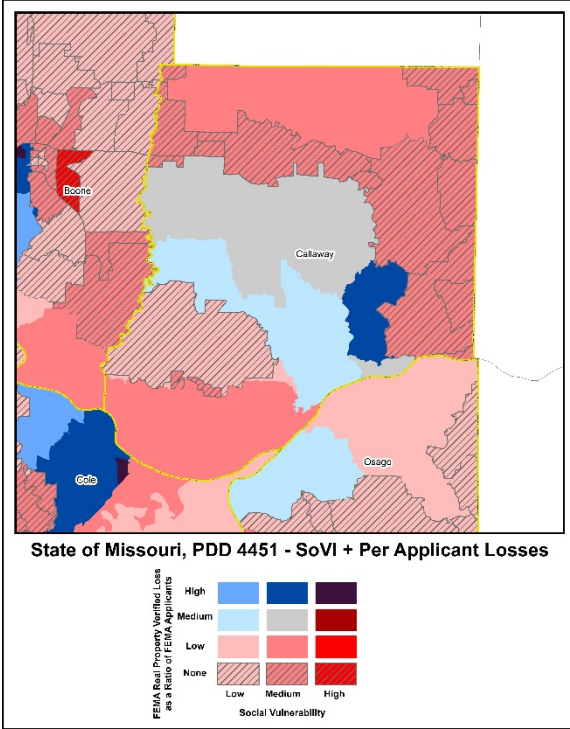


**Responsible Staff**

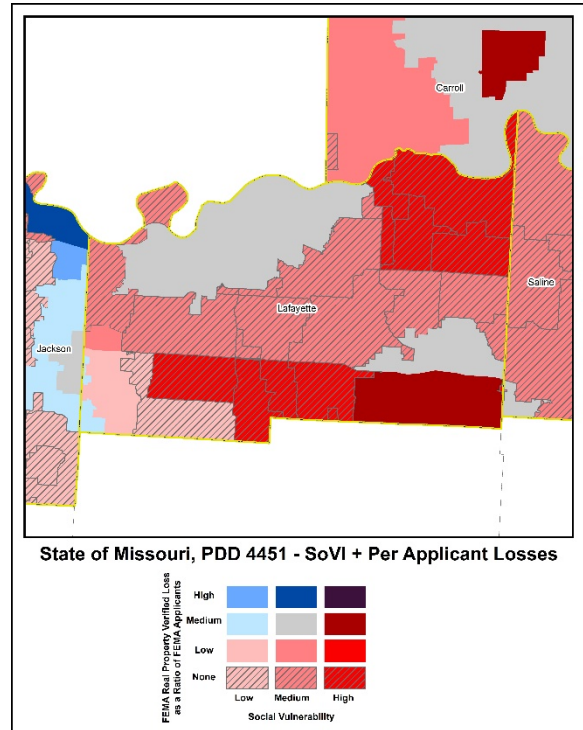
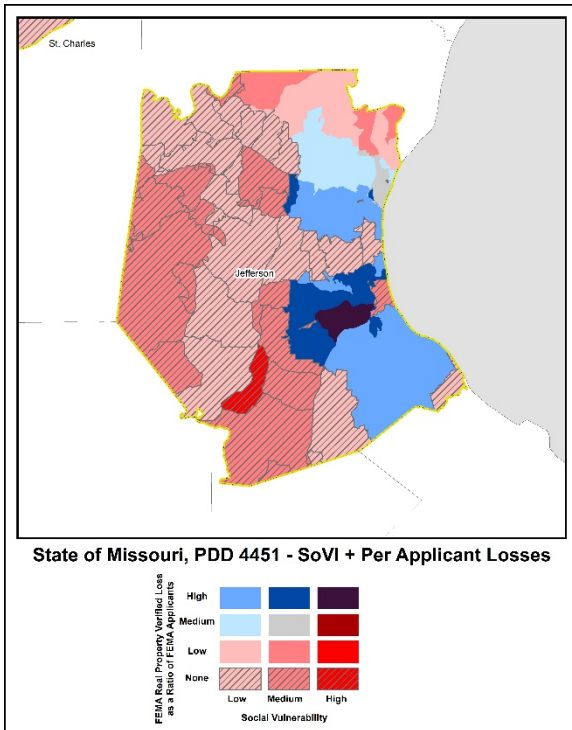
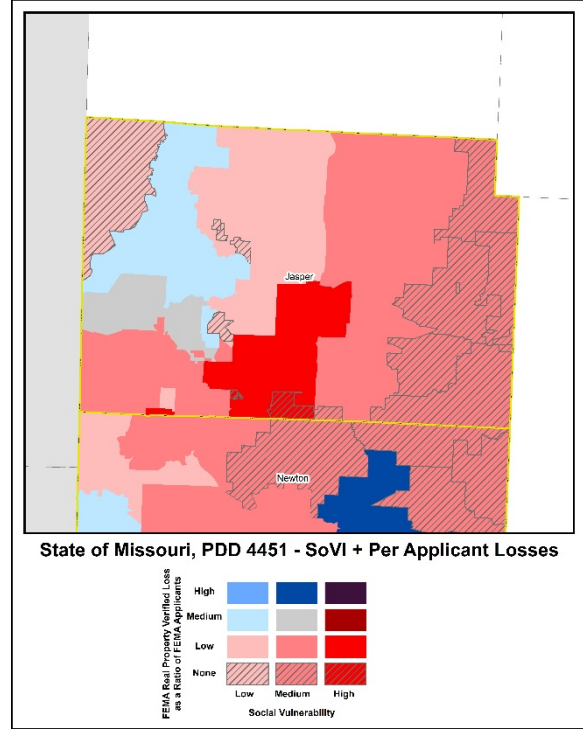
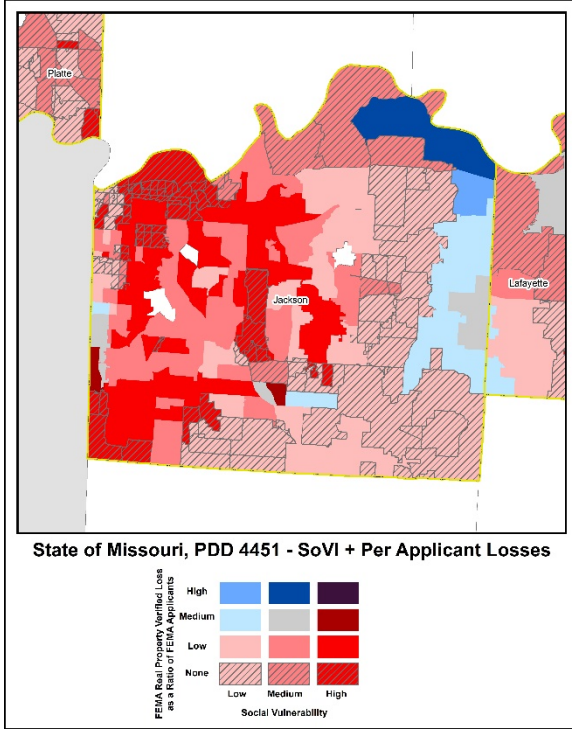
<b>Staff Name</b>	<b>Website Role</b>	<b>Contact Information</b>
<b>CDBG Program Coordination Specialist</b>	Website Co-Coordinator	Candace Buford <a href="mailto:Candace.Buford@ded.mo.gov">Candace.Buford@ded.mo.gov</a> 573-751-3600
<b>Strategy and Performance Communication Team</b>	Website Co-Coordinator	Chase Lindley <a href="mailto:Chase.Lindly@ded.mo.gov">Chase.Lindly@ded.mo.gov</a> 573-751-3600
<b>CDBG Program Manager</b>	CDBG-DR Content Reviewer	Mary Rajek <a href="mailto:Mary.Rajek@ded.mo.gov">Mary.Rajek@ded.mo.gov</a> 573-751-3600
<b>CDBG Program Manager</b>	CDBG-MIT Content Reviewer	
<b>Strategy and Performance Communication Team</b>	CDBG-DR Content Approver	Ashton Kever <a href="mailto:Ashton.Kever@ded.mo.gov">Ashton.Kever@ded.mo.gov</a> 573-751-3600
<b>Strategy and Performance Communication Team</b>	CDBG-MIT Content Approver	
<b>Strategy and Performance Communication Team</b>	Website Content Manager (Upload docs to websites)	

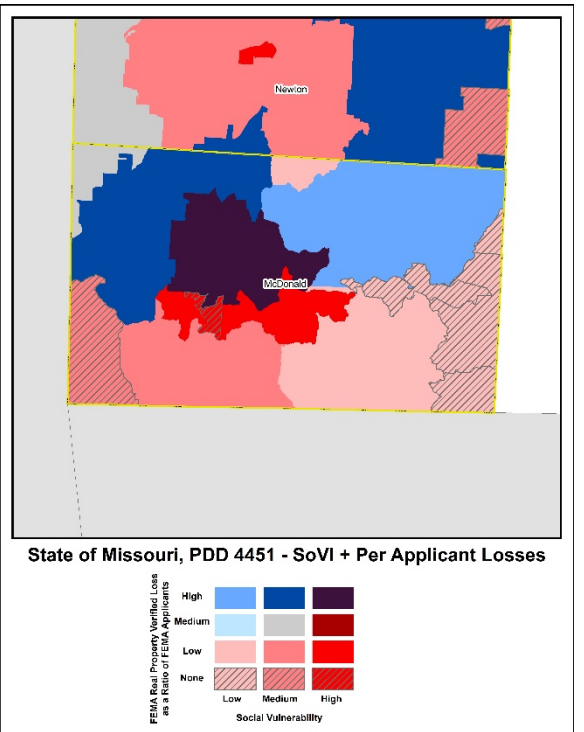
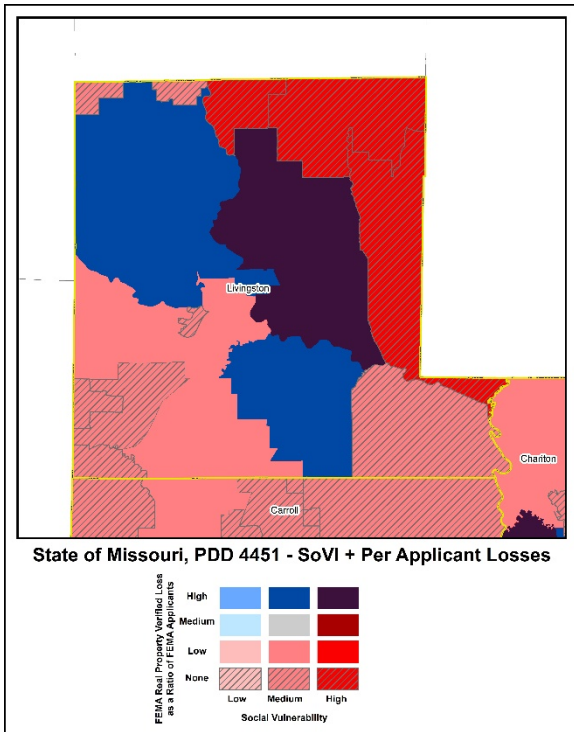
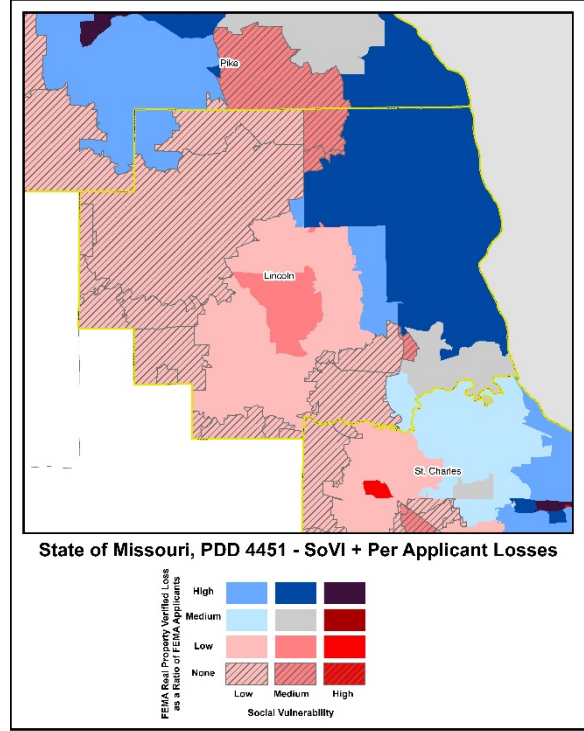
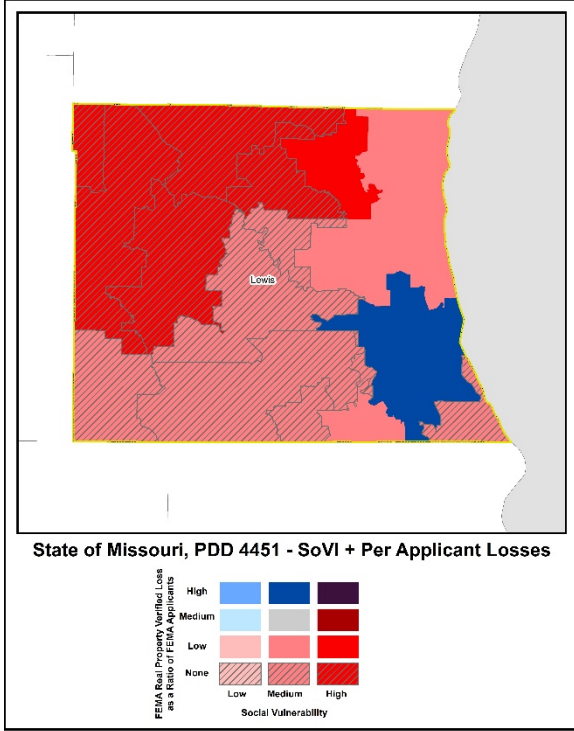
# APPENDIX A: DR-4451, IA COUNTY BIVARIATE SOVI AND REAL PROPERTY LOSSES

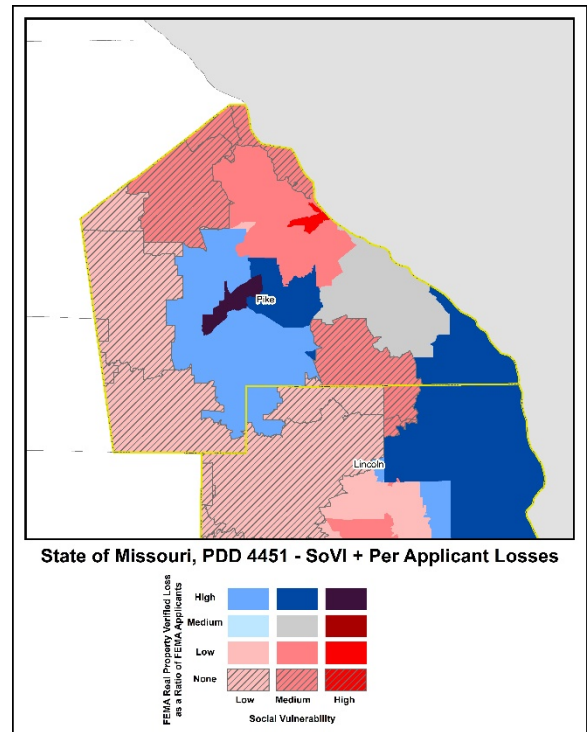
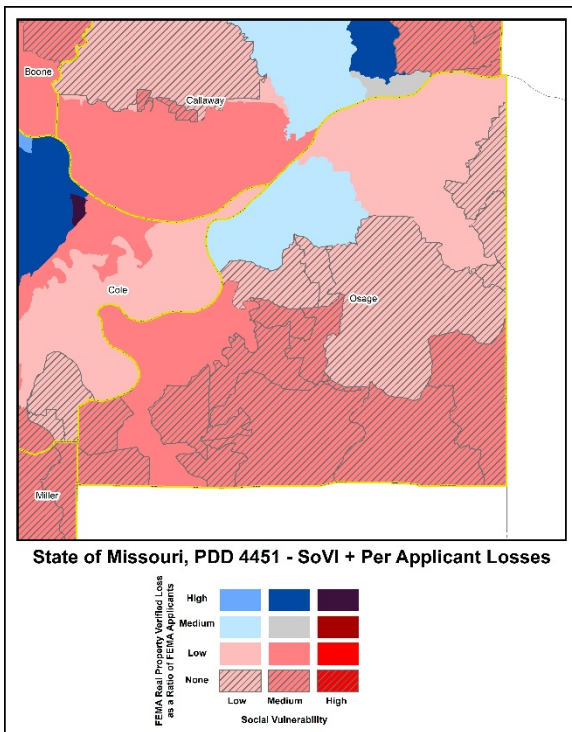
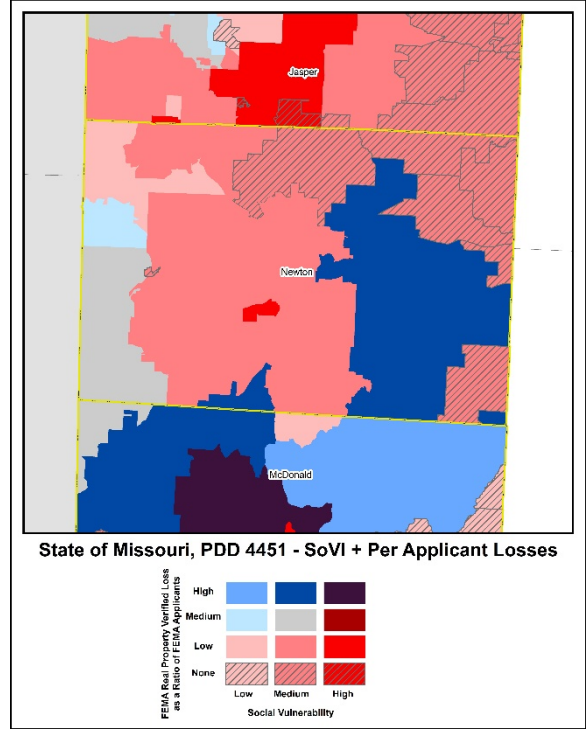
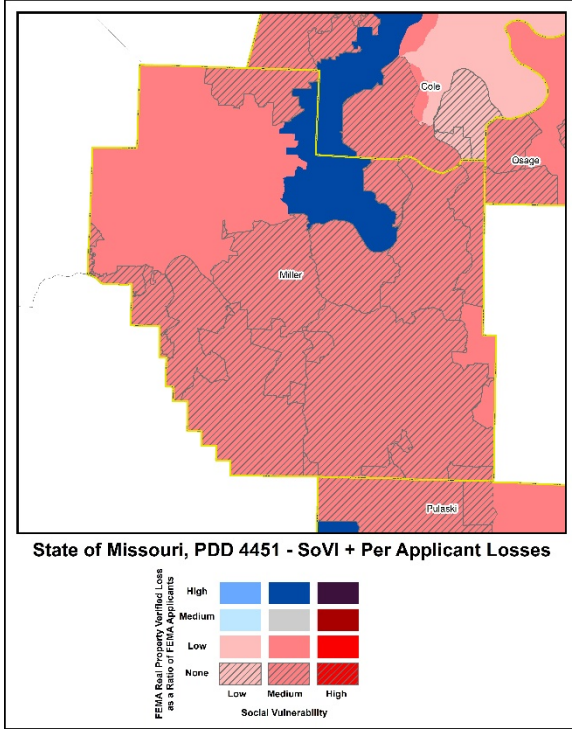




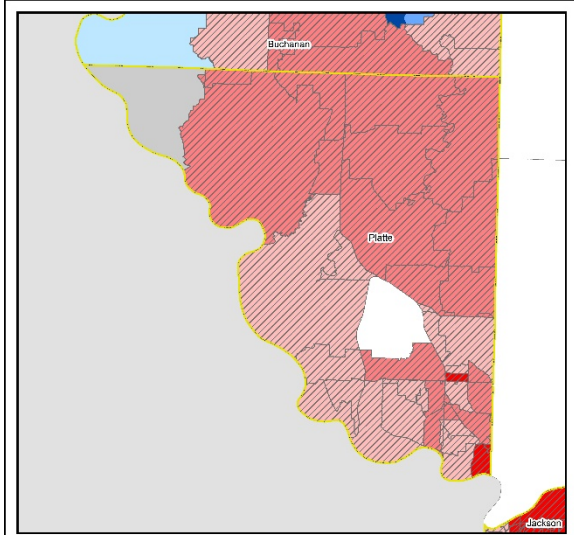




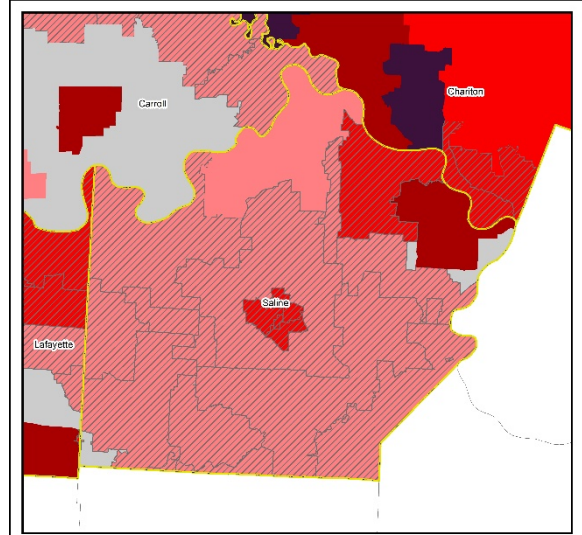
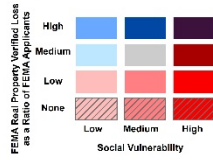




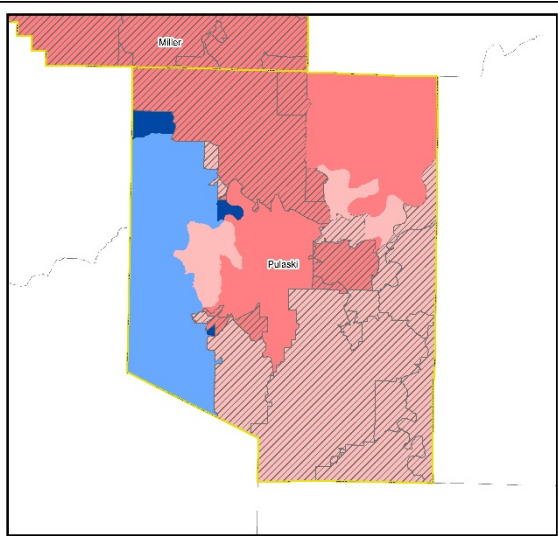
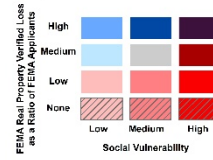




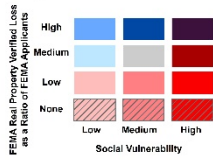
State of Missouri, PDD 4451 - SoVI + Per Applicant Losses



State of Missouri, PDD 4451 - SoVI + Per Applicant Losses



State of Missouri, PDD 4451 - SoVI + Per Applicant Losses





## APPENDIX B: DR-4451, COUNTY DEMOGRAPHIC PROFILES

People	United States	Missouri	Andrew County	Atchison County	Boone County
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	17,712	5,143	180,463
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	5.70%	4.90%	5.80%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	18.50%	25.40%	12.30%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	96.40%	97.50%	81.30%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	1.10%	0.50%	9.70%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	0.40%	0.40%	0.40%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	0.60%	0.30%	5.30%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	1.50%	1.20%	3.20%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	2.60%	1.30%	3.50%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	1.00%	0.80%	6.60%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	7,337	2,956	78,940
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	78.20%	70.30%	55.30%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$140,100	\$85,600	\$179,800
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$757	\$542	\$849
<b>Building permits, 2018</b>	1,328,827	16,875	1	1	557
<b>Households, 2014-2018</b>	119,730,128	2,396,271	6,807	2,505	69,957
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.53	2.06	2.39
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	2.30%	1.10%	8.10%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	92.00%	90.60%	94.20%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	23.80%	22.50%	46.00%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	8.90%	12.20%	8.10%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	9.40%	12.00%	10.10%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	Suppressed	3,291	11,268

<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	62.60%	62.70%	67.40%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$55,683	\$48,385	\$54,043
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$28,027	\$29,009	\$29,365
<b>Persons in poverty, percent</b>	11.80%	13.20%	8.20%	11.80%	16.80%

Persons	United States	Missouri	Buchanan County	Callaway County	Carroll County
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	87,364	44,743	8,679
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	6.30%	5.50%	5.80%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	16.10%	16.30%	21.80%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	88.50%	91.80%	96.10%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	6.00%	4.50%	1.80%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	0.70%	0.60%	0.30%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	1.60%	0.80%	0.20%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	2.80%	2.30%	1.50%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	6.90%	2.20%	1.60%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	3.90%	1.90%	1.30%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	38,804	18,997	4,650
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	63.50%	72.90%	72.30%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$118,400	\$144,200	\$84,100
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$754	\$703	\$538
<b>Building permits, 2018</b>	1,328,827	16,875	78	69	4
<b>Households, 2014-2018</b>	119,730,128	2,396,271	33,432	16,038	3,552
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.54	2.55	2.46
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	6.00%	2.40%	2.90%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	88.20%	85.90%	86.50%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	20.70%	22.20%	17.00%

<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	12.40%	10.30%	11.10%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	11.50%	10.60%	13.20%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	9,753	2,868	2,865
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	62.40%	57.70%	57.40%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$50,457	\$55,376	\$42,149
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$25,419	\$25,069	\$24,597
<b>Persons in poverty, percent</b>	11.80%	13.20%	15.60%	11.70%	12.30%

<b>People</b>	<b>United States</b>	<b>Missouri</b>	<b>Chariton County</b>	<b>Greene County</b>	<b>Jackson County</b>
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	7,426	293,086	703,011
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	6.00%	6.00%	6.60%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	23.60%	16.50%	14.90%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	95.60%	90.50%	70.10%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	2.40%	3.40%	23.80%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	0.40%	0.80%	0.60%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	0.30%	2.30%	1.90%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	1.30%	3.00%	3.20%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	1.00%	3.90%	9.10%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	0.40%	3.00%	5.80%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	4,151	134,568	326,019
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	81.00%	57.40%	58.50%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$91,600	\$141,200	\$139,000
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$515	\$754	\$881
<b>Building permits, 2018</b>	1,328,827	16,875	2	1,271	3,564
<b>Households, 2014-2018</b>	119,730,128	2,396,271	2,779	122,026	282,653

<b>Persons per household, 2014-2018</b>	2.63	2.47	2.63	2.27	2.41
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	0.60%	4.80%	9.30%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	90.00%	91.60%	90.30%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	18.40%	30.20%	30.90%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	10.30%	11.00%	9.60%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	12.00%	11.30%	12.60%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	1,451	10,330	8,776
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	54.10%	61.60%	66.50%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$46,992	\$44,808	\$52,805
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$24,470	\$26,378	\$30,237
<b>Persons in poverty, percent</b>	11.80%	13.20%	13.40%	15.50%	13.00%

<b>People</b>	<b>United States</b>	<b>Missouri</b>	<b>Jasper County</b>	<b>Jefferson County</b>	<b>Lafayette County</b>
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	121,328	225,081	32,708
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	6.90%	5.90%	5.80%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	15.60%	15.00%	18.90%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	90.80%	96.10%	94.30%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	2.40%	1.20%	2.20%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	1.80%	0.30%	0.70%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	1.30%	0.80%	0.50%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	3.30%	1.60%	2.20%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	8.30%	2.00%	2.90%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	4.10%	1.80%	1.40%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	51,797	91,627	14,826

<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	64.80%	79.70%	72.50%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$115,900	\$158,100	\$127,300
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$773	\$848	\$703
<b>Building permits, 2018</b>	1,328,827	16,875	602	677	60
<b>Households, 2014-2018</b>	119,730,128	2,396,271	45,261	84,393	12,959
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.58	2.62	2.46
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	6.90%	2.70%	2.70%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	87.00%	88.80%	90.60%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	22.90%	20.20%	20.10%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	9.60%	9.40%	10.80%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	14.20%	10.00%	10.40%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	5,188	2,127	Suppressed
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	64.80%	66.30%	61.40%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$46,929	\$63,030	\$54,661
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$24,086	\$28,844	\$28,056
<b>Persons in poverty, percent</b>	11.80%	13.20%	16.60%	8.70%	11.00%

People	United States	Missouri	Lewis County	Lincoln County	Livingston County
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	9,776	59,013	15,227
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	5.70%	6.90%	5.60%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	18.50%	13.40%	19.20%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	94.10%	95.20%	93.50%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	3.20%	2.00%	3.80%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	0.50%	0.40%	0.50%

<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	0.50%	0.60%	0.70%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	1.70%	1.80%	1.50%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	1.80%	2.60%	1.90%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	0.90%	1.40%	0.70%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	4,544	21,847	6,836
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	73.20%	78.30%	68.10%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$87,000	\$157,500	\$103,500
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$553	\$821	\$654
<b>Building permits, 2018</b>	1,328,827	16,875	1	140	39
<b>Households, 2014-2018</b>	119,730,128	2,396,271	3,766	18,738	5,882
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.45	2.92	2.33
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	3.80%	1.80%	1.90%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	87.00%	88.30%	86.00%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	14.00%	15.90%	19.30%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	8.60%	10.50%	8.30%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	11.90%	10.50%	12.20%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	1,265	Suppressed	4,884
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	59.40%	63.90%	55.60%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$47,764	\$61,628	\$47,885
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$22,602	\$25,472	\$23,083
<b>Persons in poverty, percent</b>	11.80%	13.20%	15.40%	10.60%	15.60%

People	United States	Missouri	Osage County	Pike County	Platte County
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	13,615	18,302	104,418
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	6.10%	6.10%	6.20%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	17.40%	17.40%	14.50%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	98.10%	90.00%	86.00%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	0.40%	7.90%	7.40%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	0.40%	0.20%	0.60%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	0.20%	0.30%	2.90%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	0.80%	1.60%	2.60%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	1.00%	2.30%	6.20%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	0.10%	1.20%	5.30%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	6,686	7,929	42,366
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	83.30%	70.70%	65.80%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$146,000	\$106,100	\$216,600
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$532	\$664	\$1,001
<b>Building permits, 2018</b>	1,328,827	16,875	5	13	346
<b>Households, 2014-2018</b>	119,730,128	2,396,271	5,113	6,650	38,613
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.61	2.43	2.54
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	1.70%	3.50%	7.10%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	89.90%	84.00%	95.40%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	18.90%	16.10%	41.80%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	8.80%	9.20%	8.50%
<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	9.90%	11.90%	6.60%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	Suppressed	2,712	3,393
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	66.30%	52.80%	70.20%

<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$58,476	\$45,753	\$76,912
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$26,037	\$22,302	\$39,427
<b>Persons in poverty, percent</b>	11.80%	13.20%	9.20%	15.90%	5.80%

<b>People</b>	<b>United States</b>	<b>Missouri</b>	<b>Pulaski County</b>	<b>Saline County</b>
<b>Population estimates, July 1, 2019</b>	328,239,523	6,137,428	52,607	22,761
<b>Persons under 5 years, percent, July 1, 2018</b>	6.10%	6.10%	6.60%	5.70%
<b>Persons 65 years and over, percent, July 1, 2018</b>	16.00%	16.90%	9.00%	18.30%
<b>White alone, percent, July 1, 2018</b>	76.50%	83.00%	77.90%	89.00%
<b>Black or African American alone, percent, July 1, 2018</b>	13.40%	11.80%	12.50%	5.40%
<b>American Indian and Alaska Native alone, percent, July 1, 2018</b>	1.30%	0.60%	1.20%	0.90%
<b>Asian alone, percent, July 1, 2018</b>	5.90%	2.10%	3.10%	0.90%
<b>Two or More Races, percent, July 1, 2018</b>	2.70%	2.30%	4.60%	2.60%
<b>Hispanic or Latino, percent, July 1, 2018</b>	18.30%	4.30%	11.30%	10.40%
<b>Foreign born persons, percent, 2014-2018</b>	13.50%	4.10%	5.10%	6.20%
<b>Housing units, July 1, 2018</b>	138,537,078	2,806,371	19,165	10,189
<b>Owner-occupied housing unit rate, 2014-2018</b>	63.80%	66.80%	48.70%	68.90%
<b>Median value of owner-occupied housing units, 2014-2018</b>	\$204,900	\$151,600	\$151,200	\$102,000
<b>Median gross rent, 2014-2018</b>	\$1,023	\$809	\$976	\$626
<b>Building permits, 2018</b>	1,328,827	16,875	49	3
<b>Households, 2014-2018</b>	119,730,128	2,396,271	15,026	8,562
<b>Persons per household, 2014-2018</b>	2.63	2.47	2.88	2.54
<b>Language other than English spoken at home, Percent 5 years+, 2014-2018</b>	21.50%	6.10%	10.30%	9.80%
<b>High school graduate or higher, percent of persons age 25 years+, 2014-2018</b>	87.70%	89.60%	91.40%	84.10%
<b>Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018</b>	31.50%	28.60%	25.90%	18.00%
<b>With a disability, under age 65 years, percent, 2014-2018</b>	8.60%	10.40%	16.70%	12.30%



<b>Persons without health insurance, under age 65 years, percent</b>	10.00%	11.20%	11.40%	12.80%
<b>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</b>	6,216	6,532	3,013	4,866
<b>In civilian labor force, total, percent of population age 16 years+, 2014-2018</b>	62.90%	62.60%	42.40%	59.50%
<b>Median household income (in 2015 dollars), 2014-2018</b>	\$60,293	\$53,560	\$51,665	\$43,201
<b>Per capita income in past 12 months (in 2015 dollars), 2014-2018</b>	\$32,621	\$29,537	\$22,018	\$22,802
<b>Persons in poverty, percent</b>	11.80%	13.20%	15.20%	14.80%

APPENDIX C: DR-4451 COUNTY LOW-MODERATE INCOME LIMITS

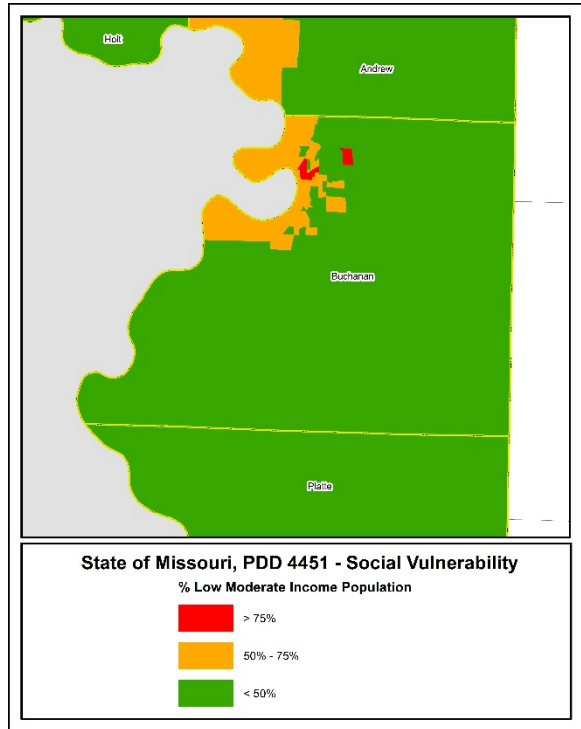
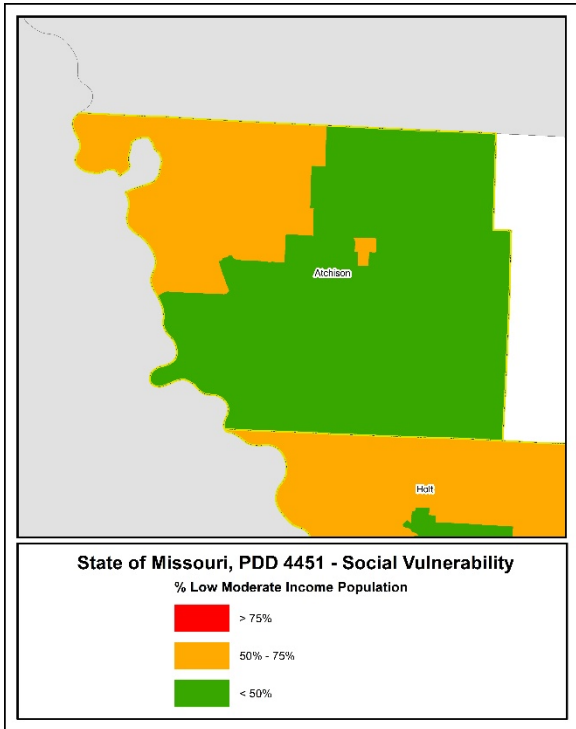
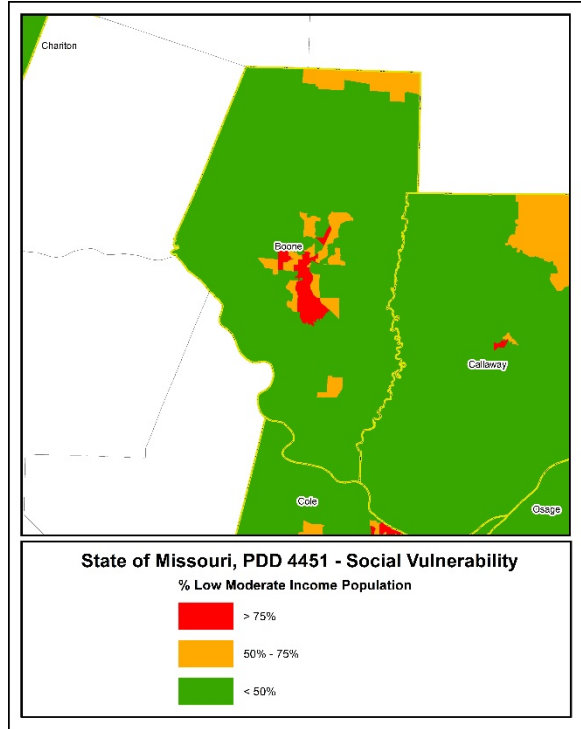
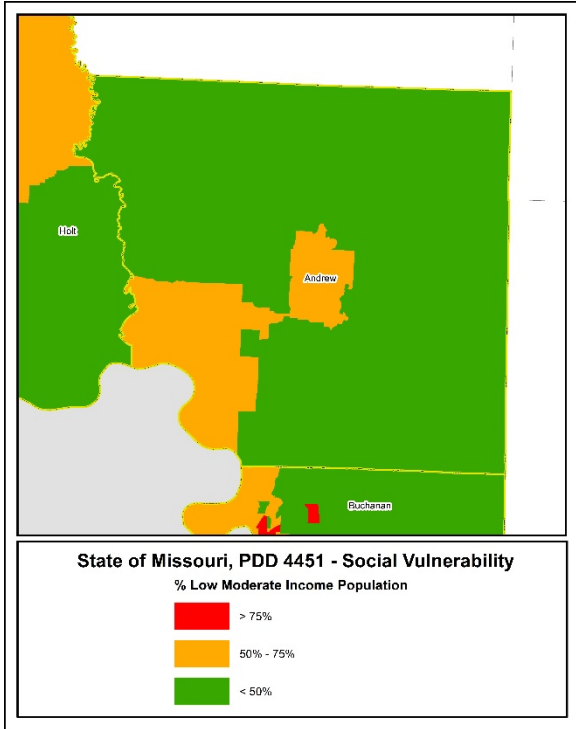
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<b>Cole</b>								
30%	\$15,900	\$18,150	\$21,720	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
50%	\$26,450	\$30,200	\$34,000	\$37,750	\$40,800	\$43,800	\$46,850	\$49,850
80%	\$42,300	\$48,350	\$54,400	\$60,400	\$65,250	\$70,100	\$74,900	\$79,750
<b>Holt</b>								
30%	\$12,760	\$17,240	\$21,720	\$26,200	\$30,680	\$34,650	\$37,050	\$39,450
50%	\$20,900	\$23,900	\$26,900	\$29,850	\$32,250	\$34,650	\$37,050	\$39,450
80%	\$33,450	\$38,200	\$43,000	\$47,750	\$51,600	\$55,400	\$59,250	\$63,050
<b>St. Charles</b>								
30%	\$17,400	\$19,900	\$22,400	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
50%	\$29,050	\$33,200	\$37,350	\$41,450	\$44,800	\$48,100	\$51,400	\$54,750
80%	\$46,450	\$53,050	\$59,700	\$66,300	\$71,650	\$76,950	\$82,250	\$87,550

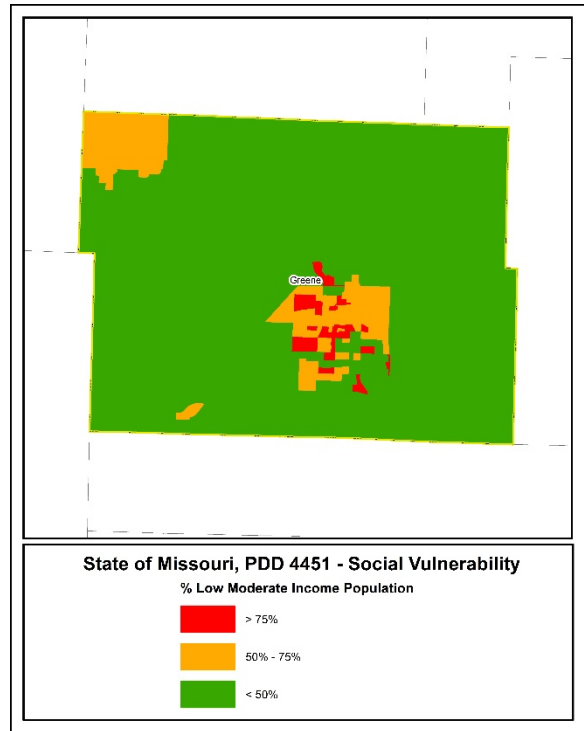
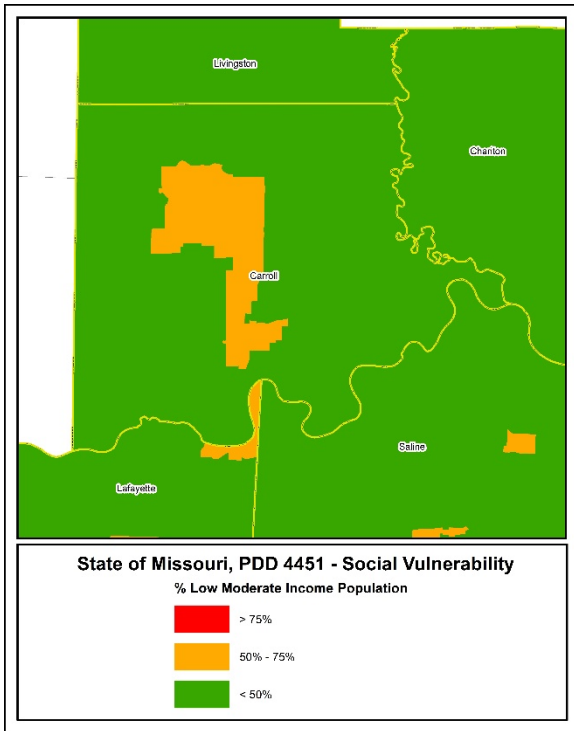
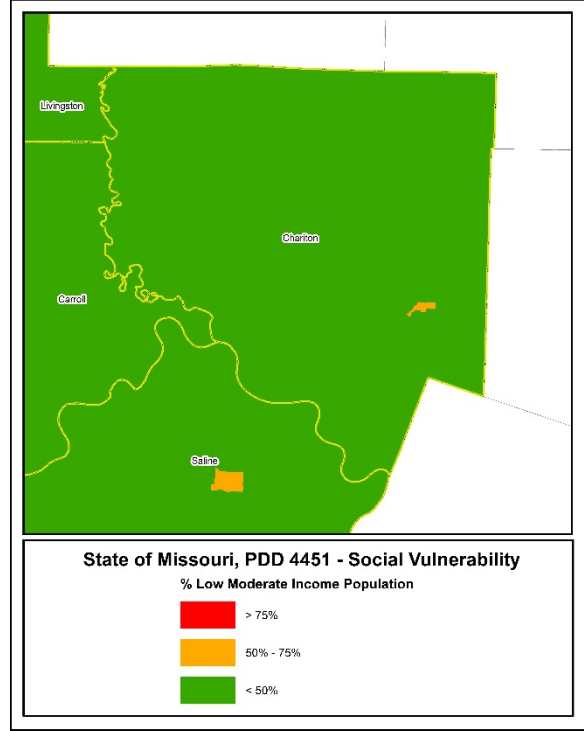
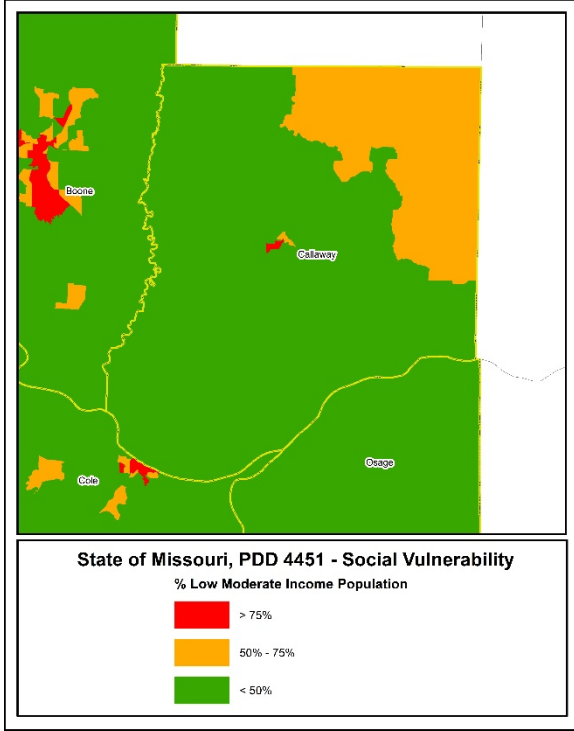
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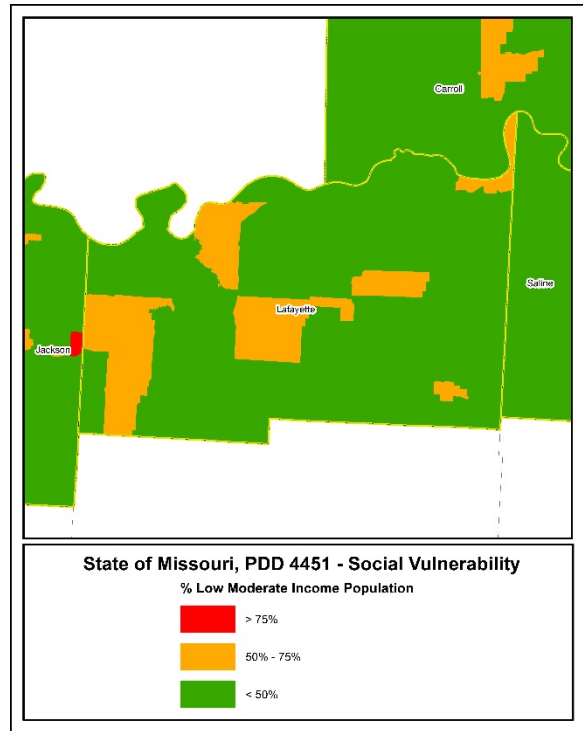
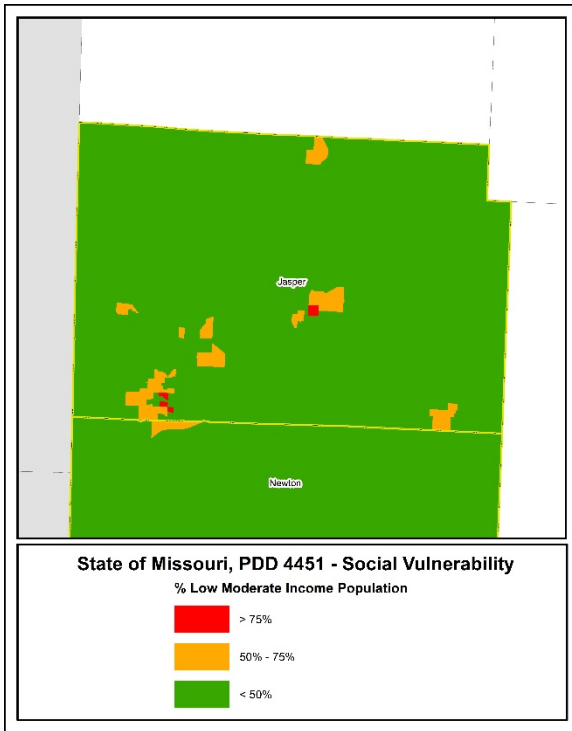
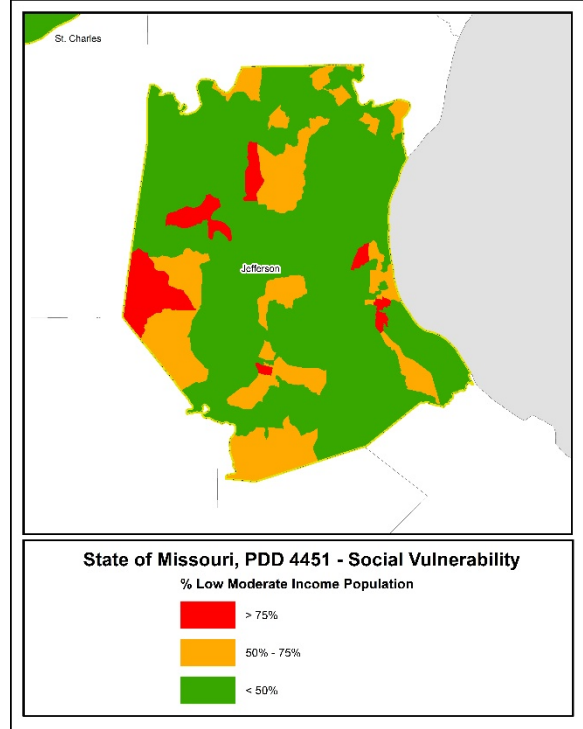
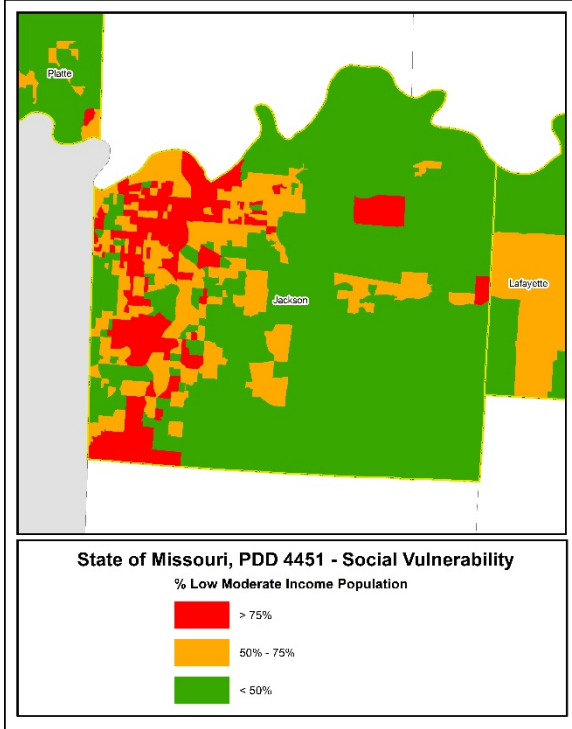
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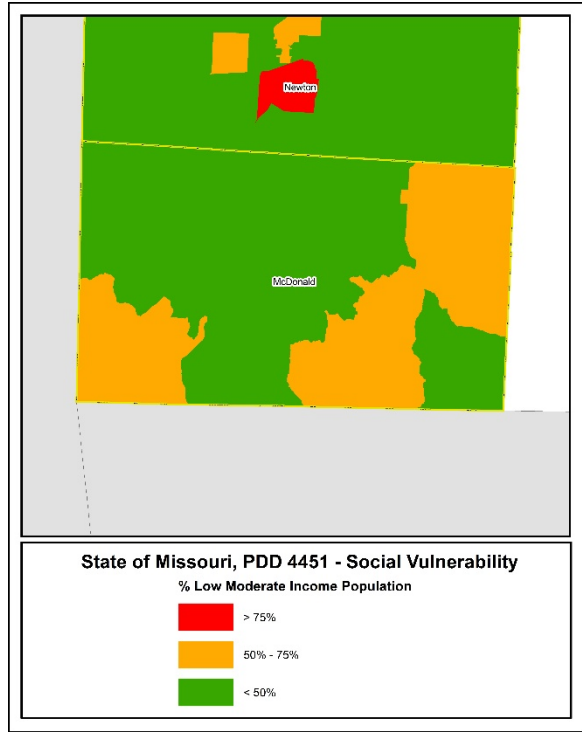
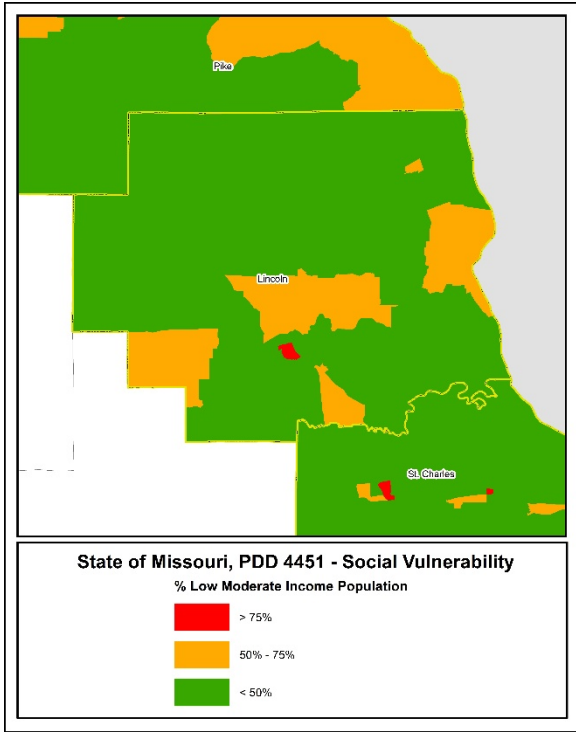
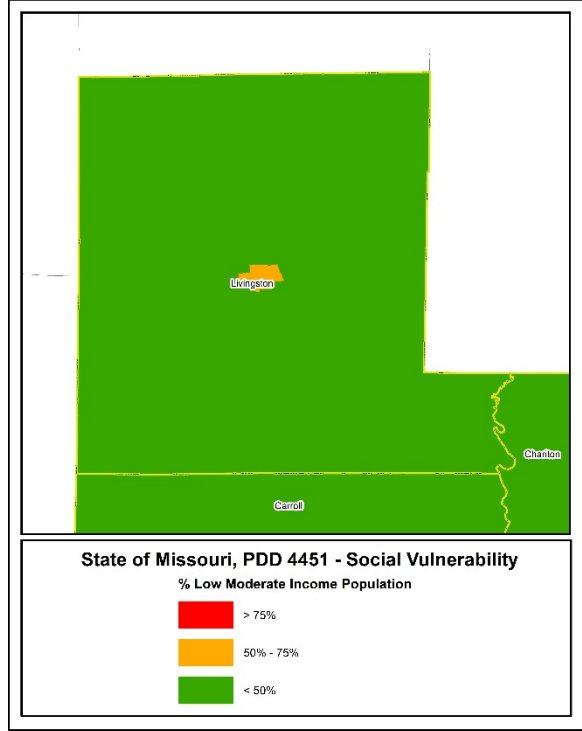
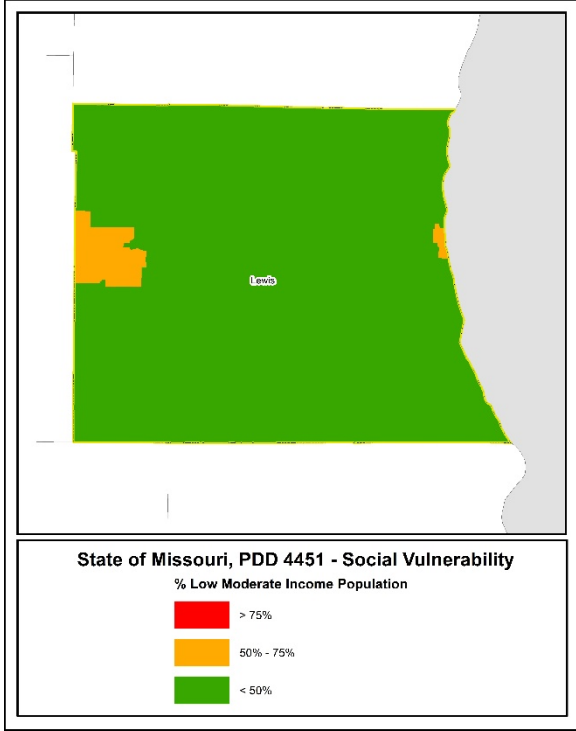
LMI	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
30%	\$15,000	\$17,150	\$19,300	\$21,450	\$23,150	\$24,900	\$26,600	\$28,300
50%	\$25,050	\$28,600	\$32,200	\$35,750	\$38,600	\$41,450	\$44,350	\$47,200
80%	\$40,050	\$45,750	\$51,500	\$57,200	\$61,800	\$66,350	\$70,950	\$75,500

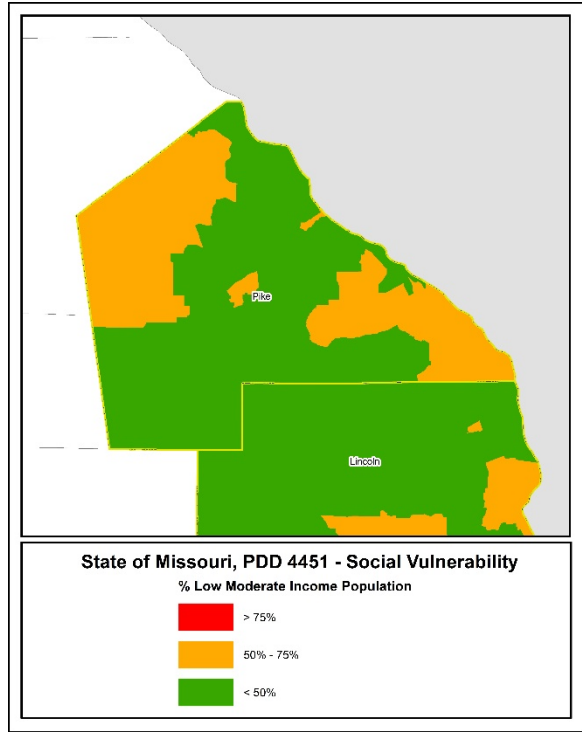
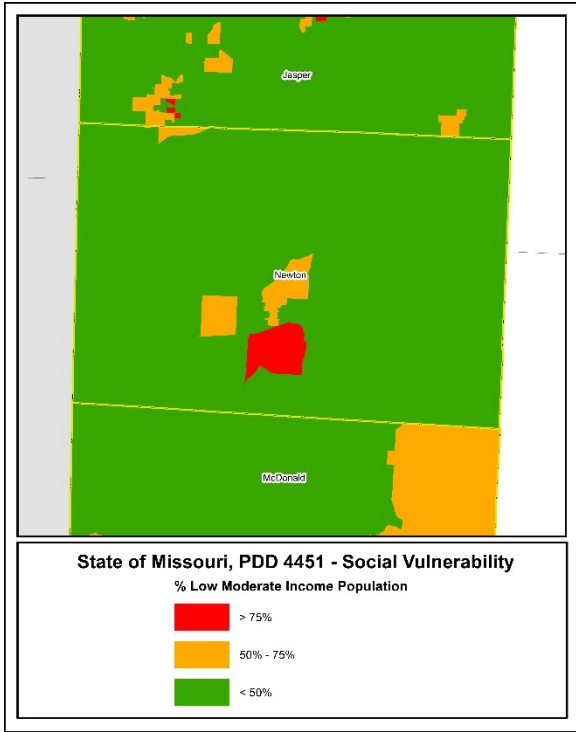
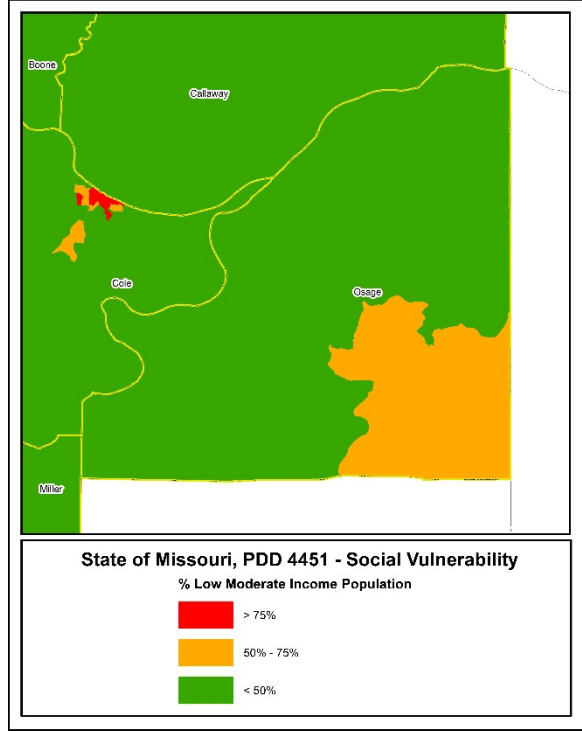
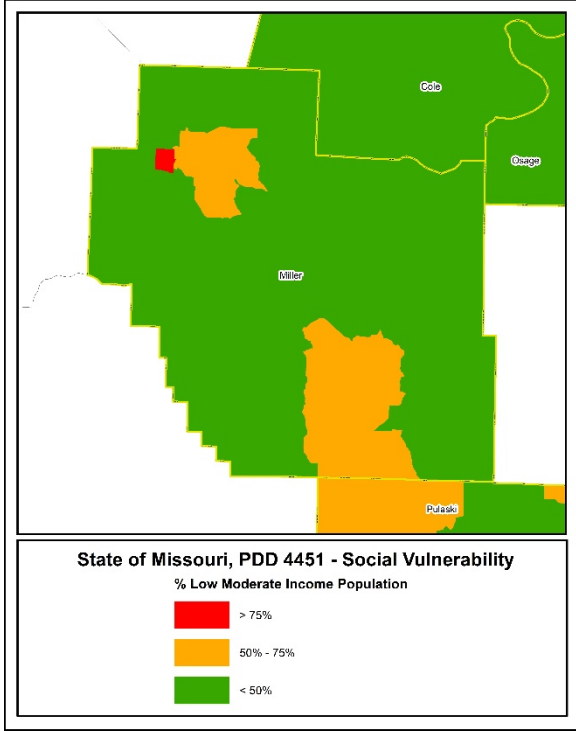
APPENDIX D: DR-4451 COUNTY LMI MAPS

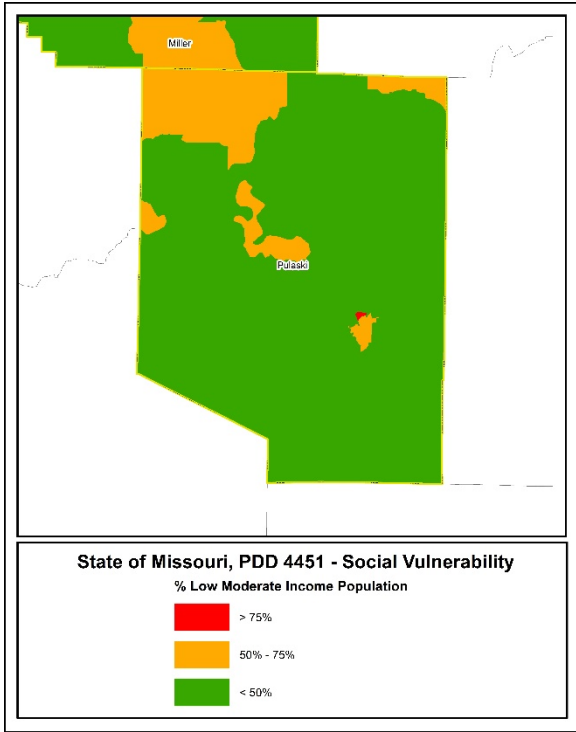
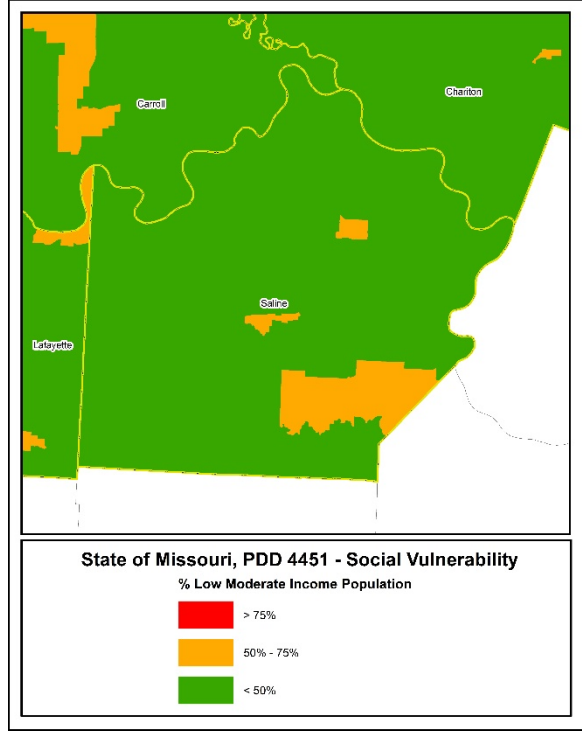
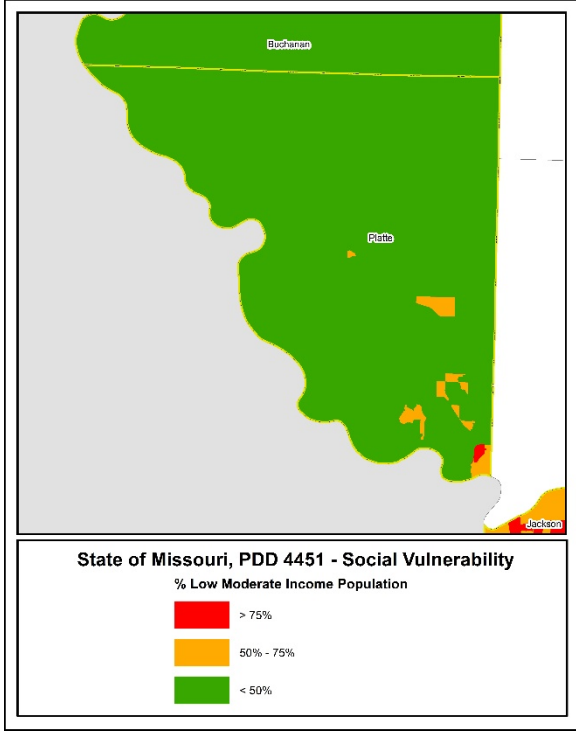






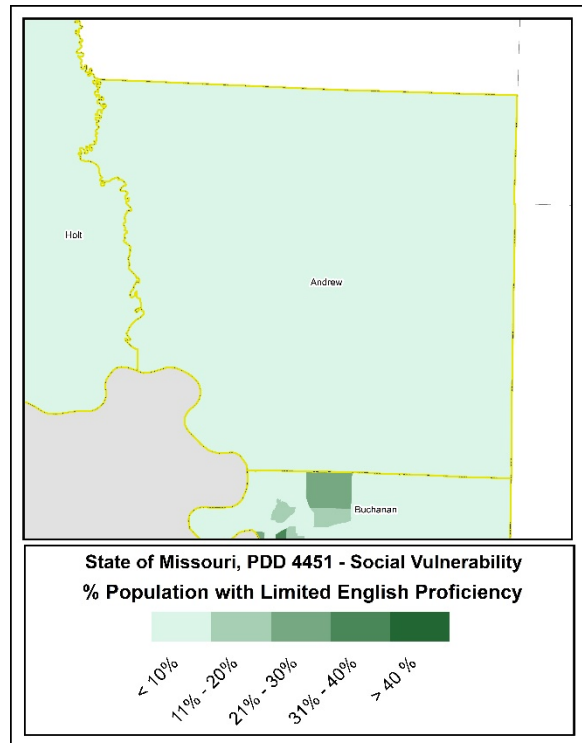
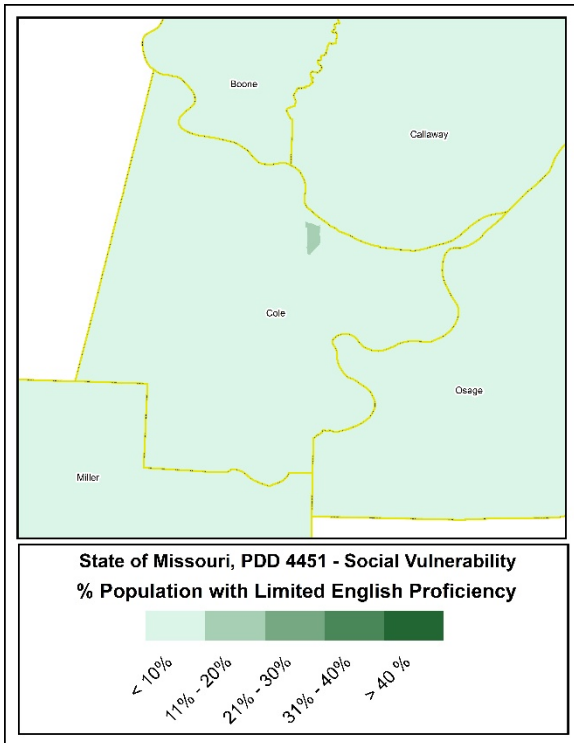
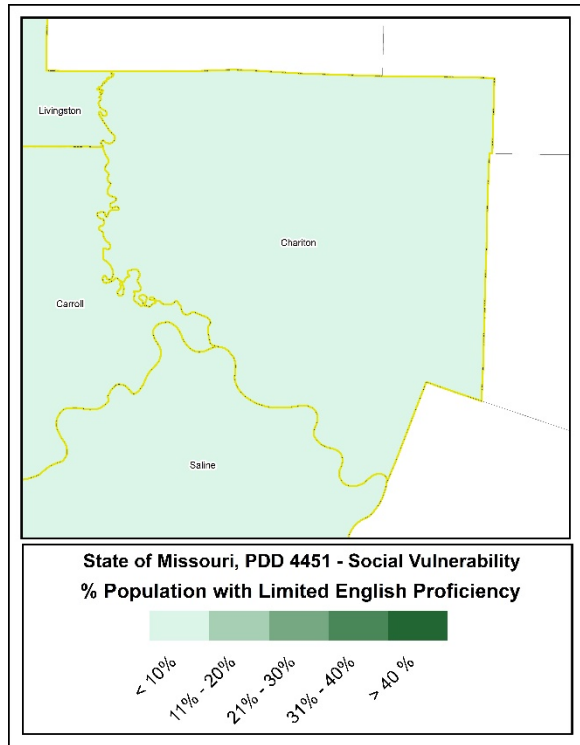
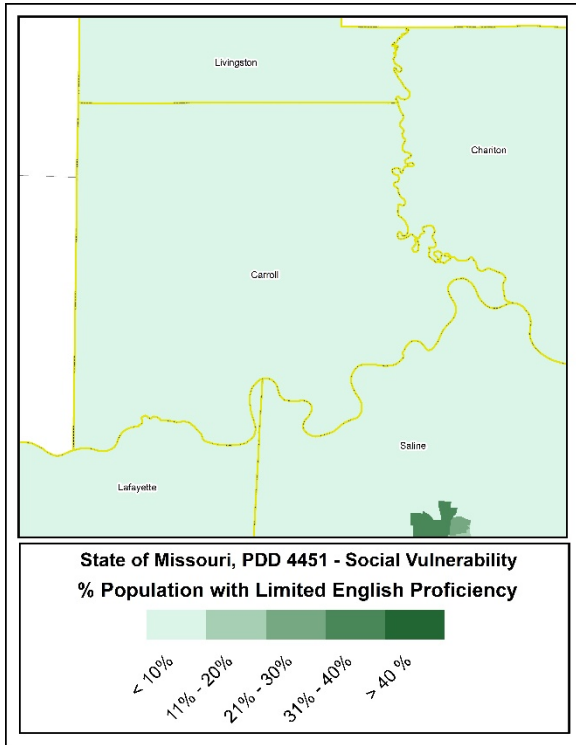


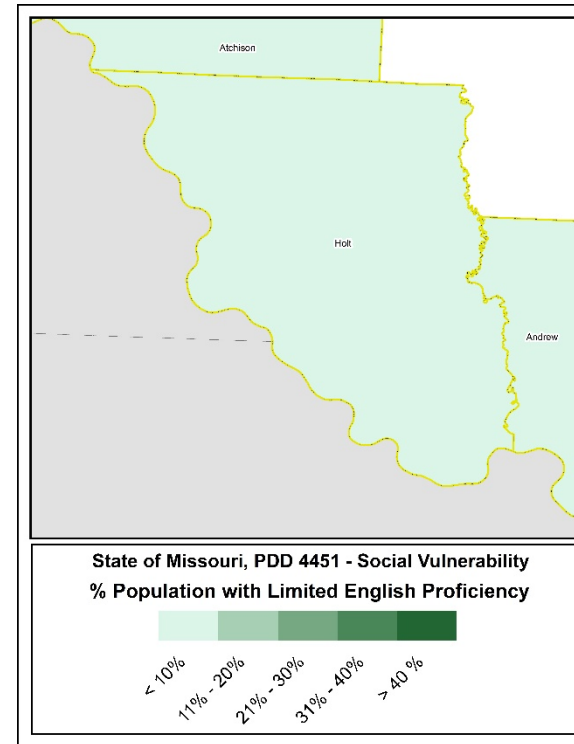
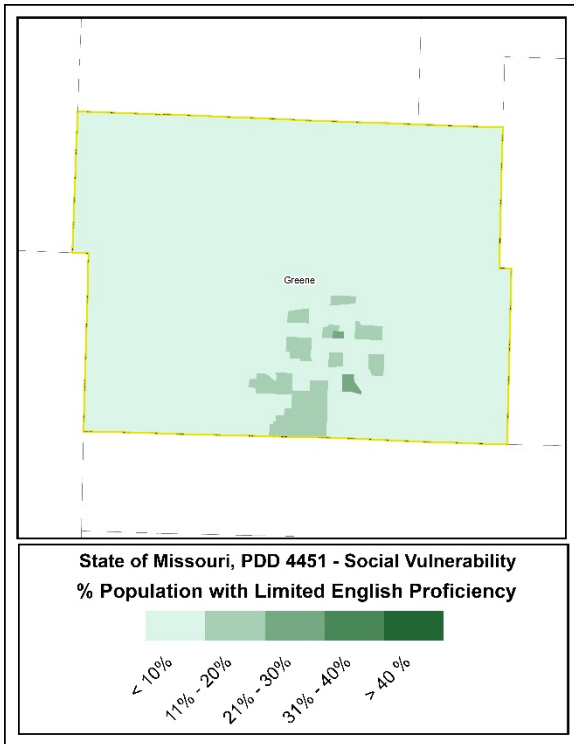
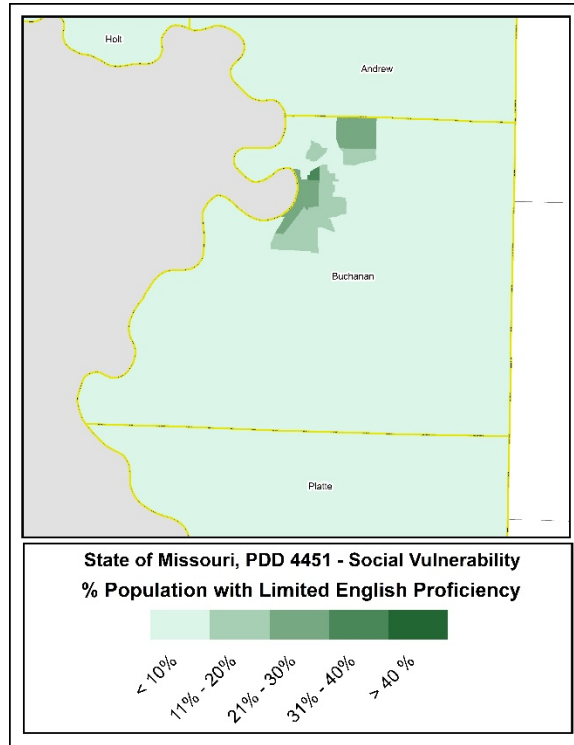
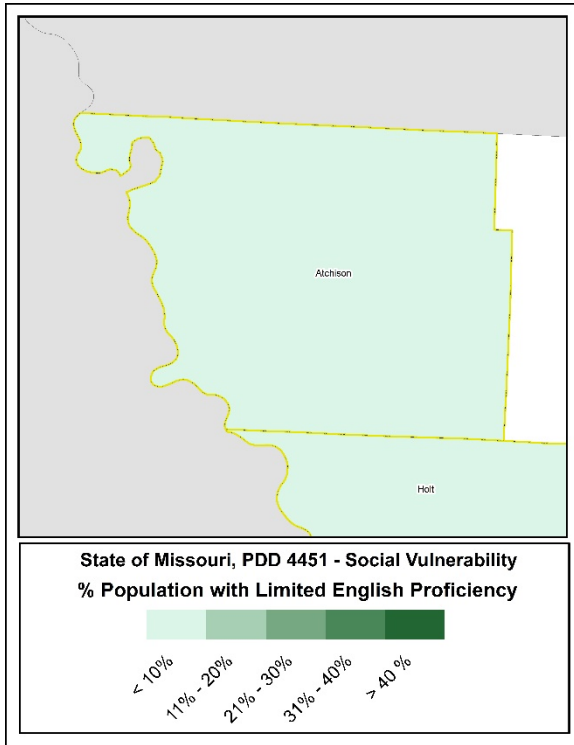


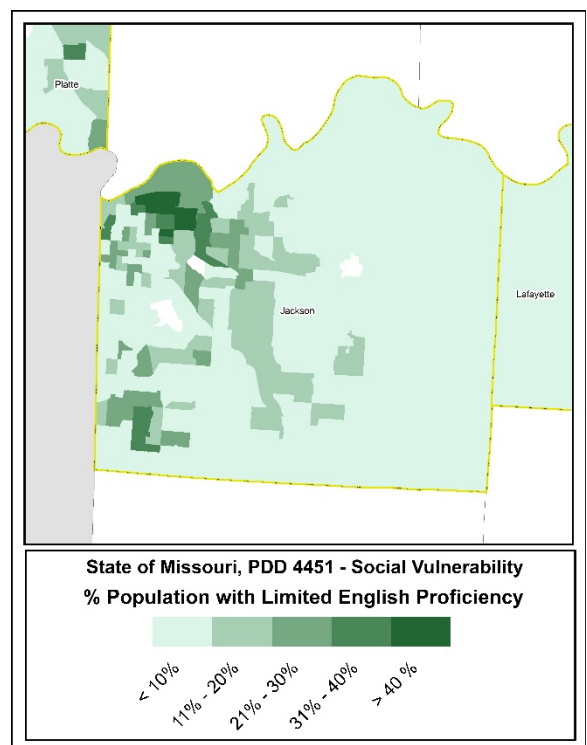
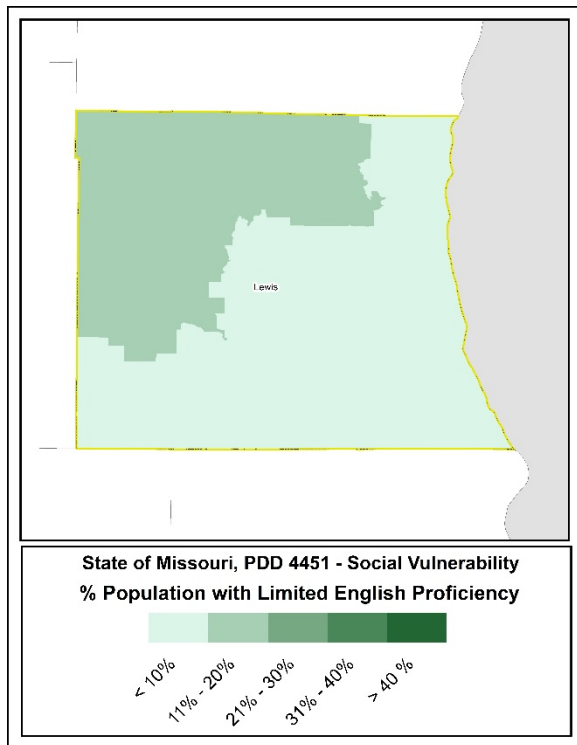
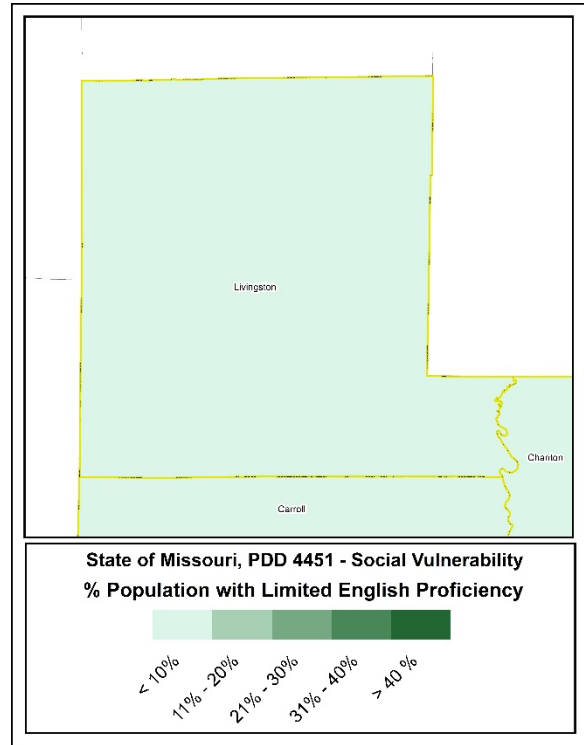
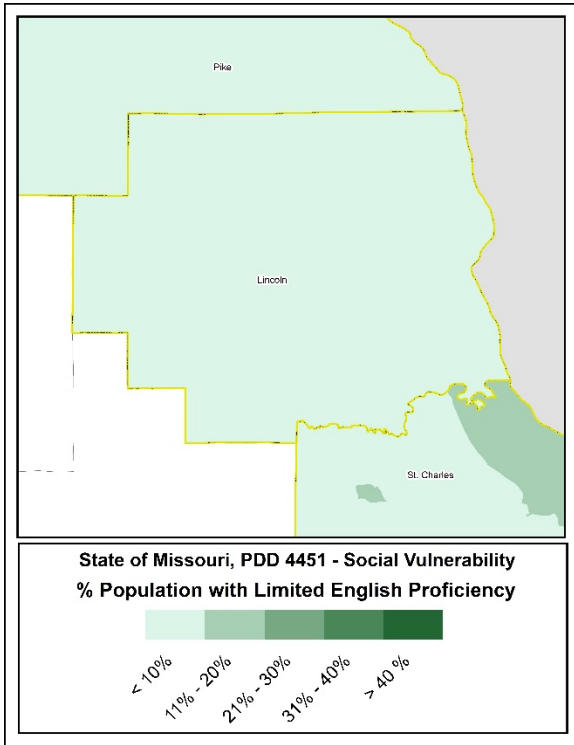


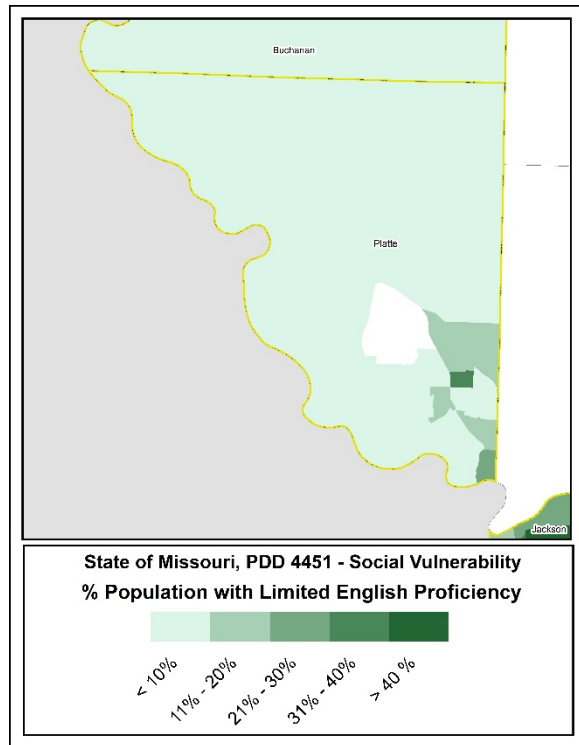
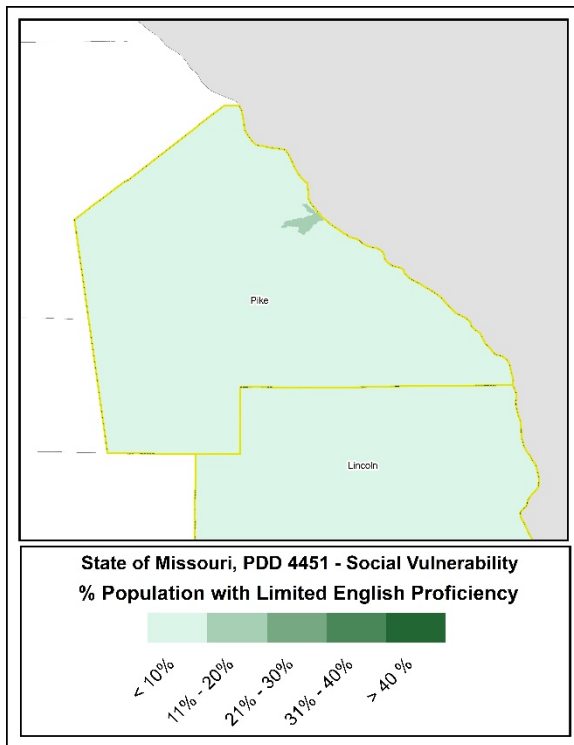
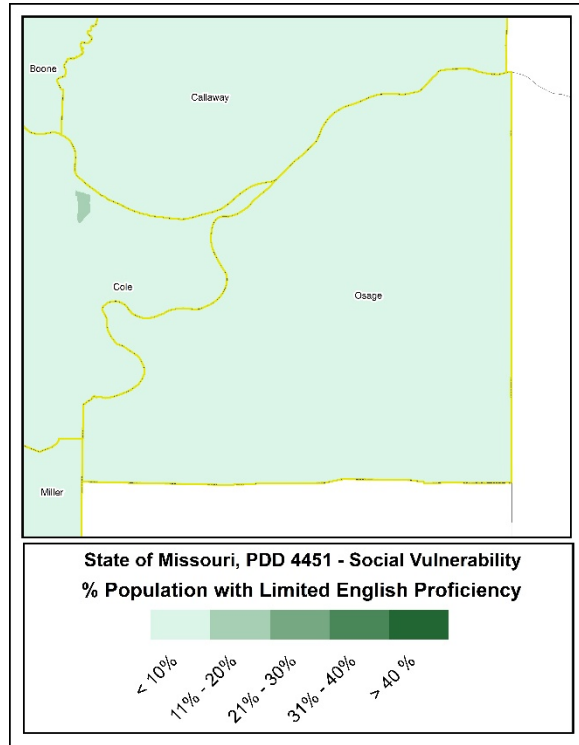
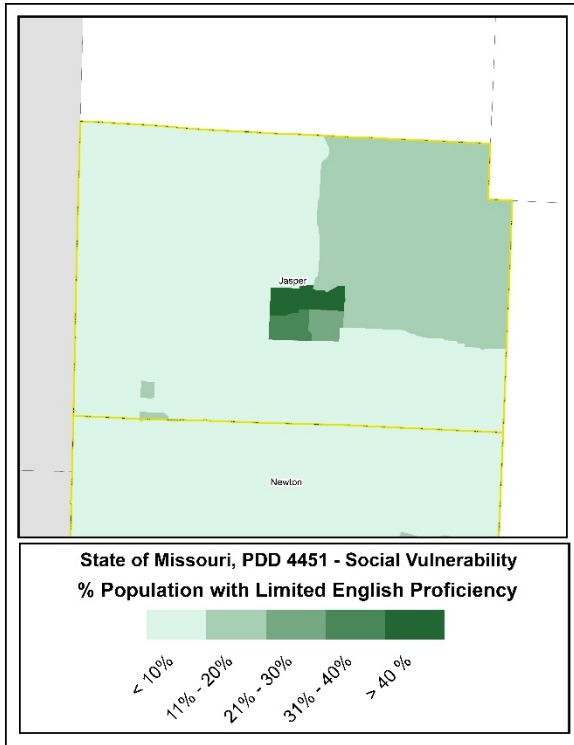


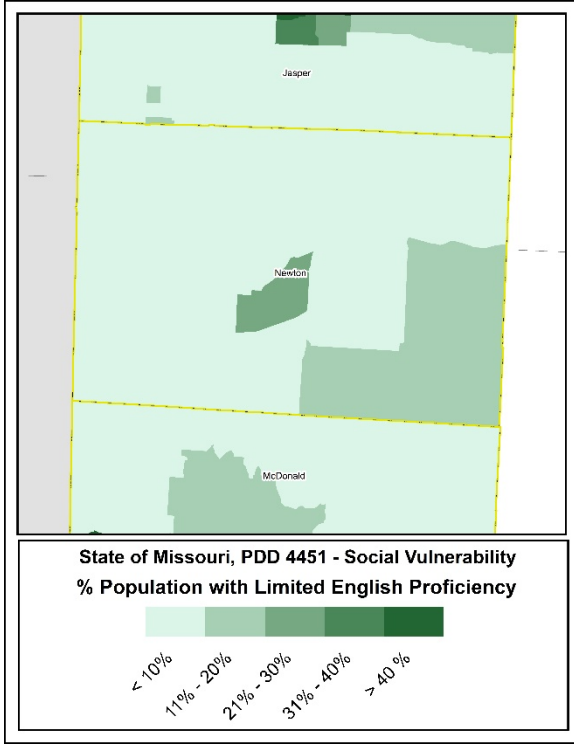
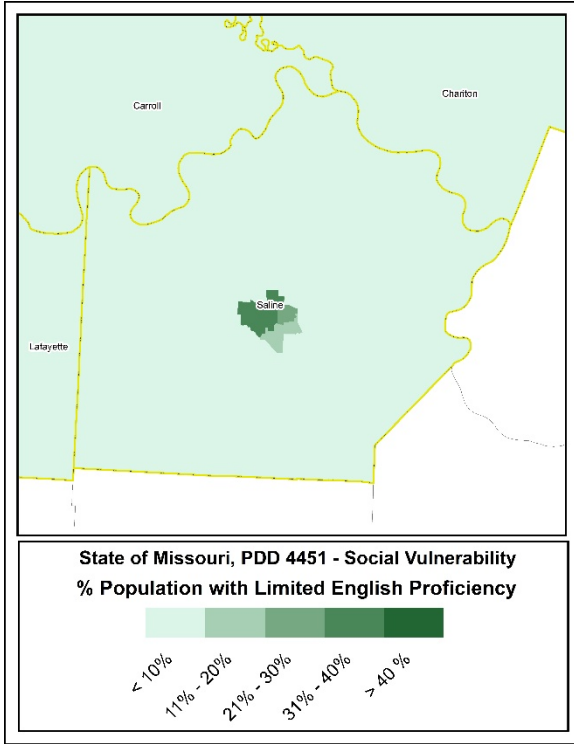
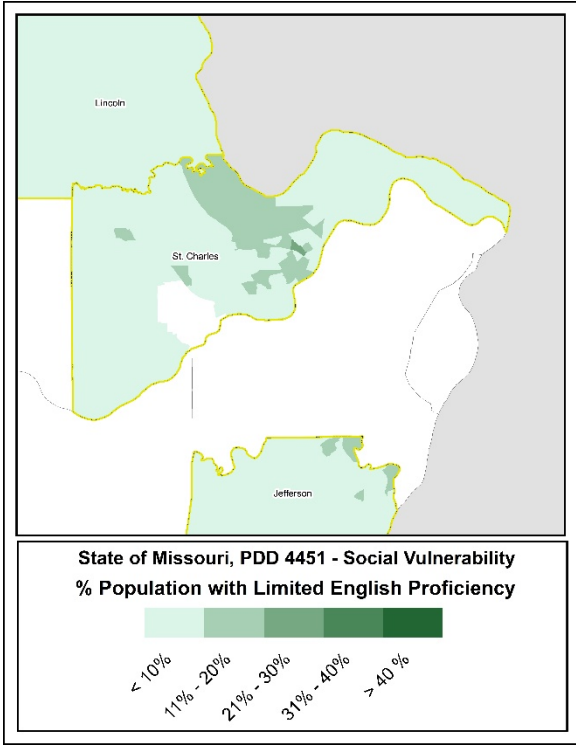
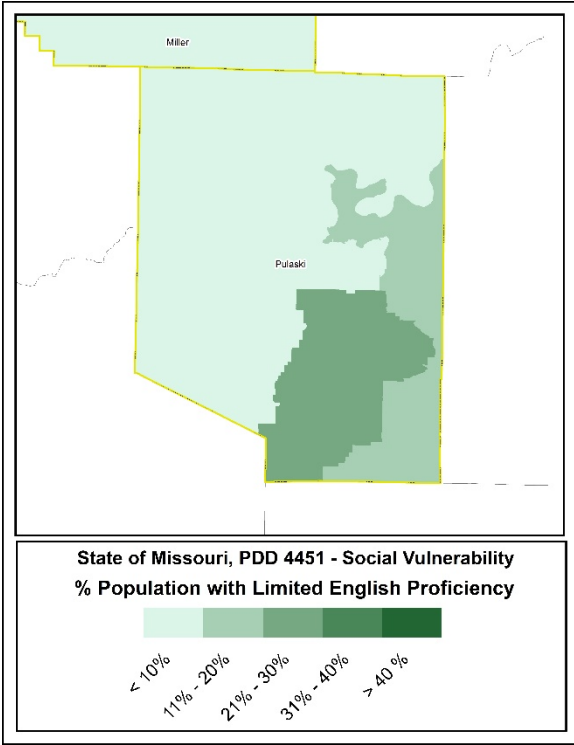
APPENDIX E: DR-4451 COUNTY ENGLISH PROFICIENCY

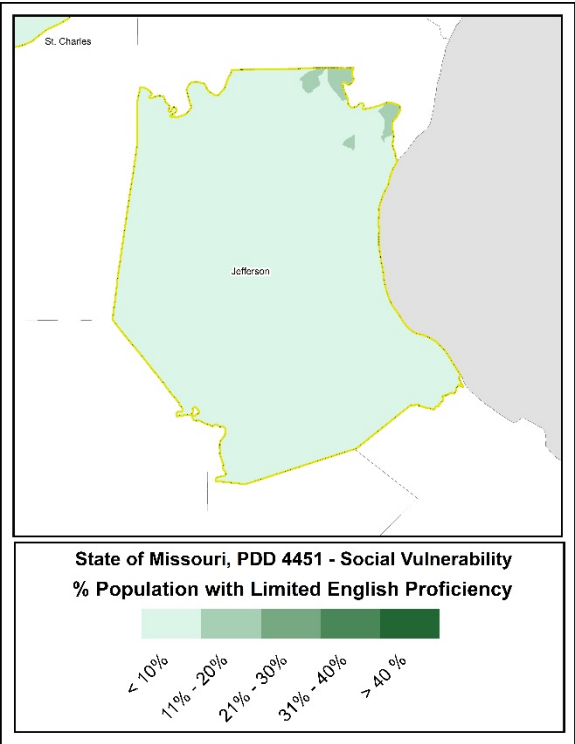
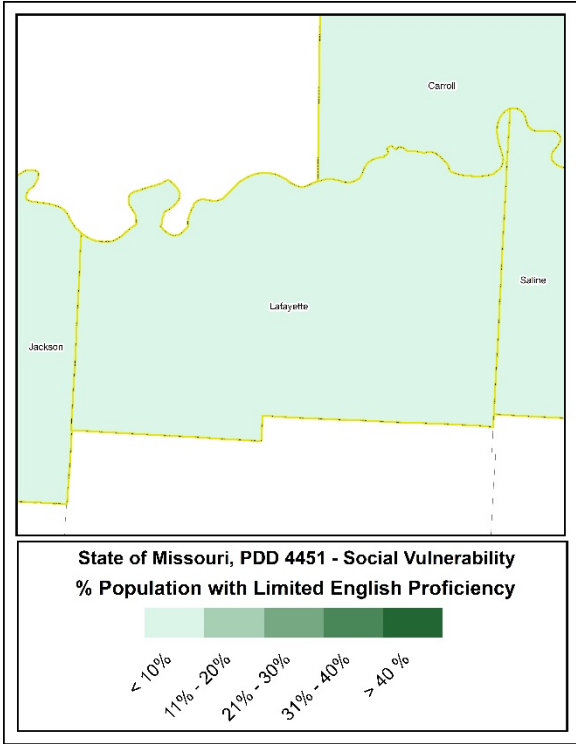
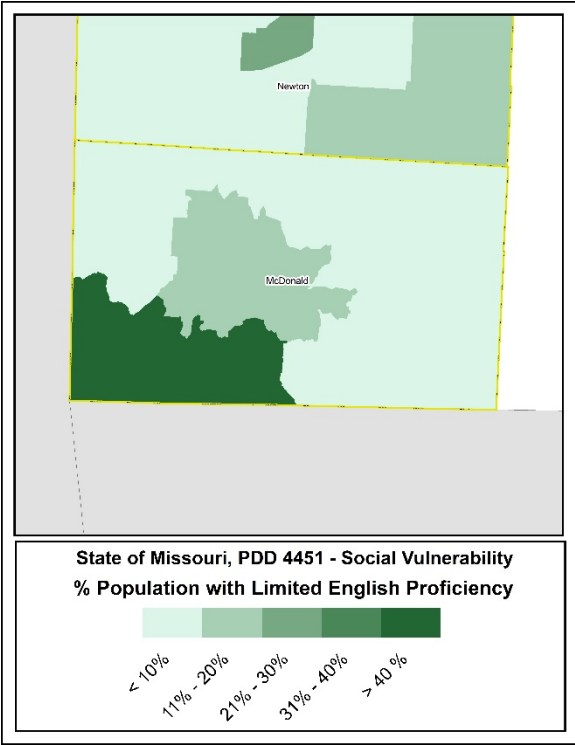
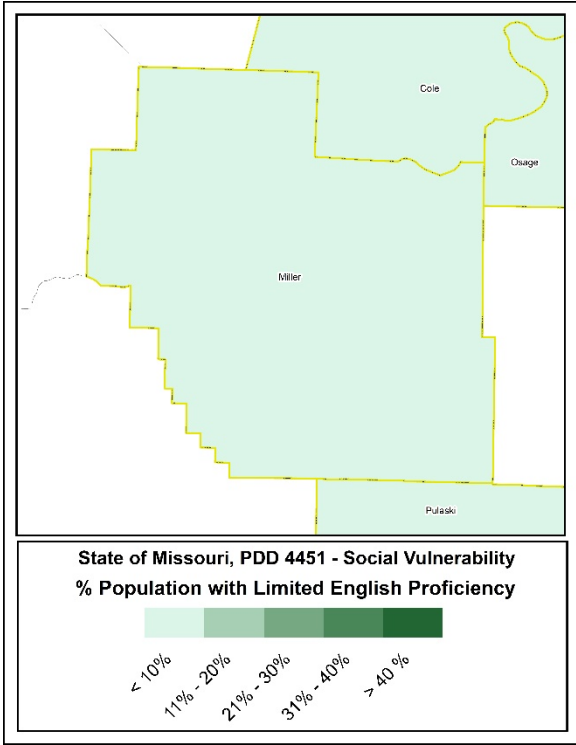




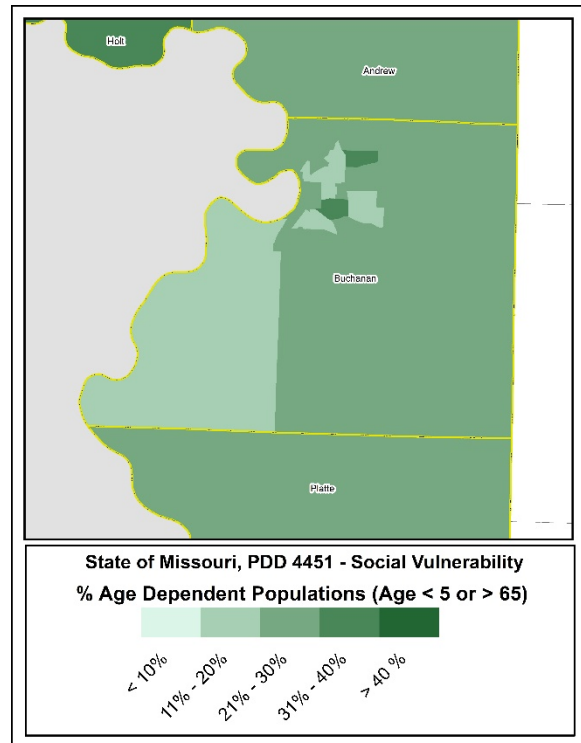
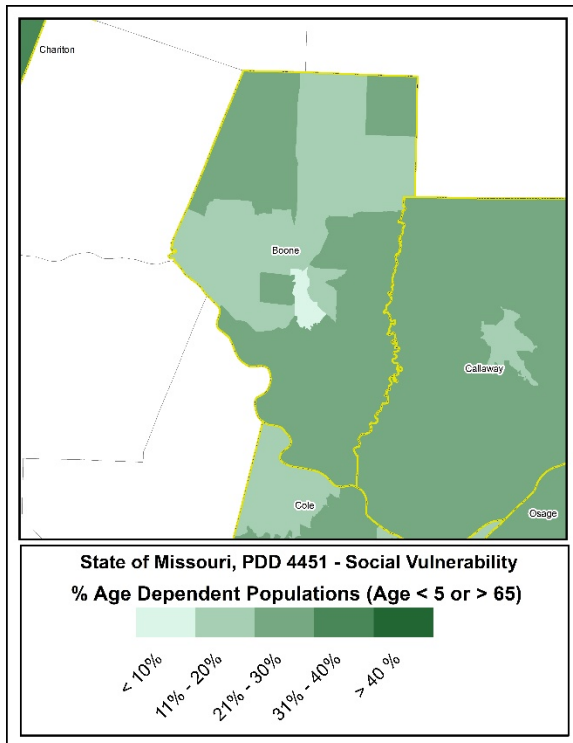
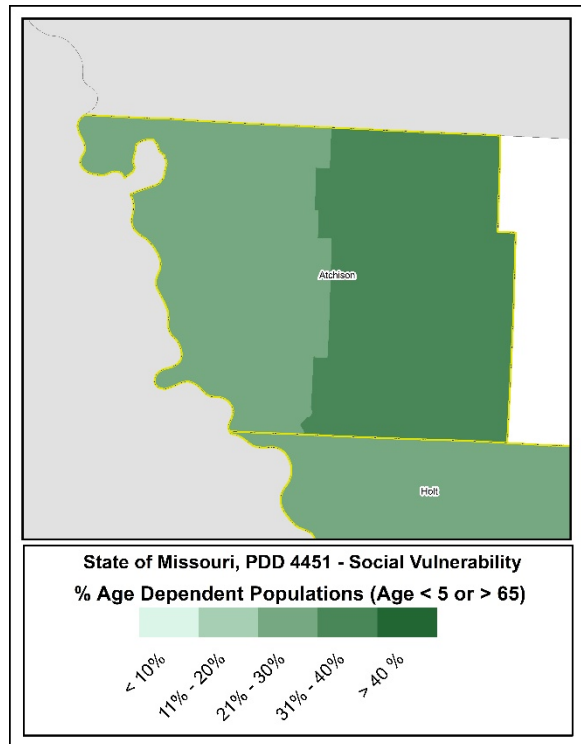
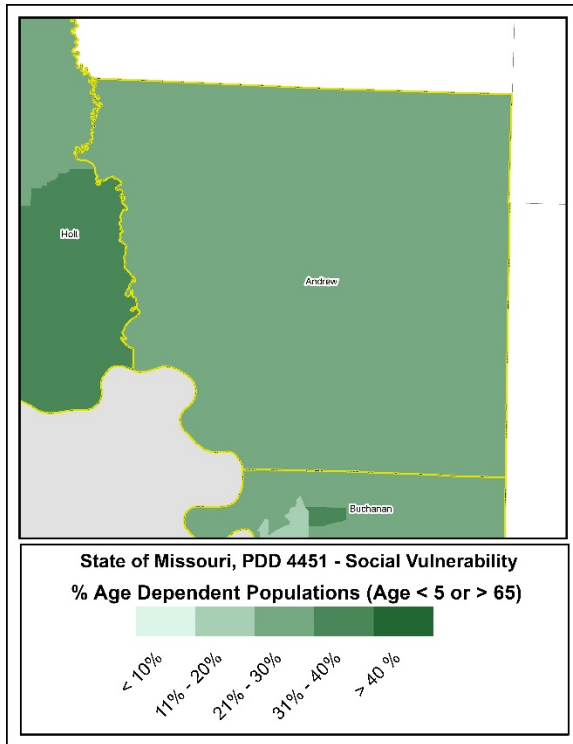


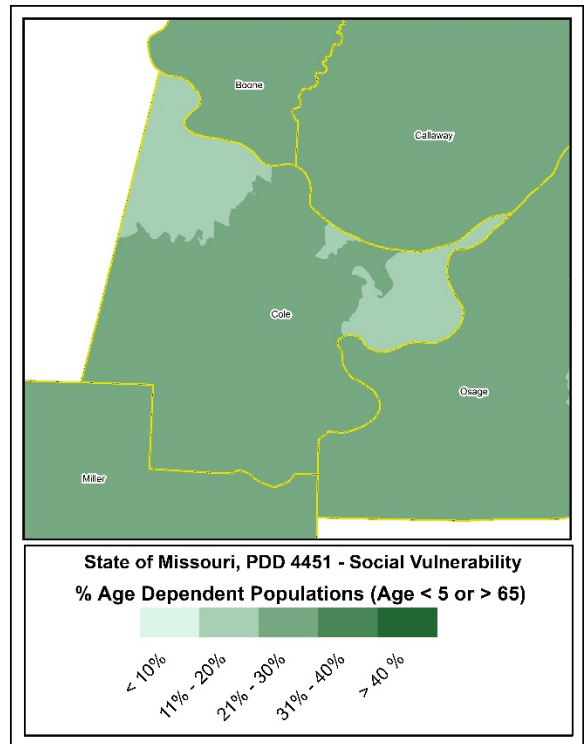
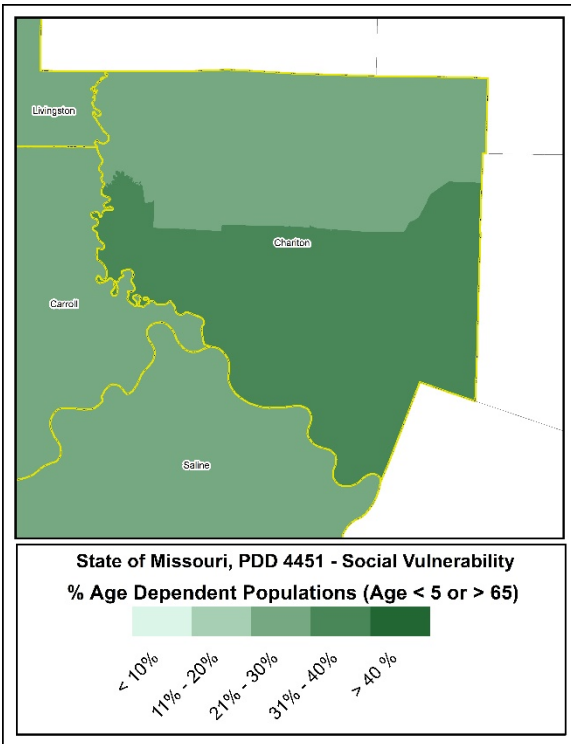
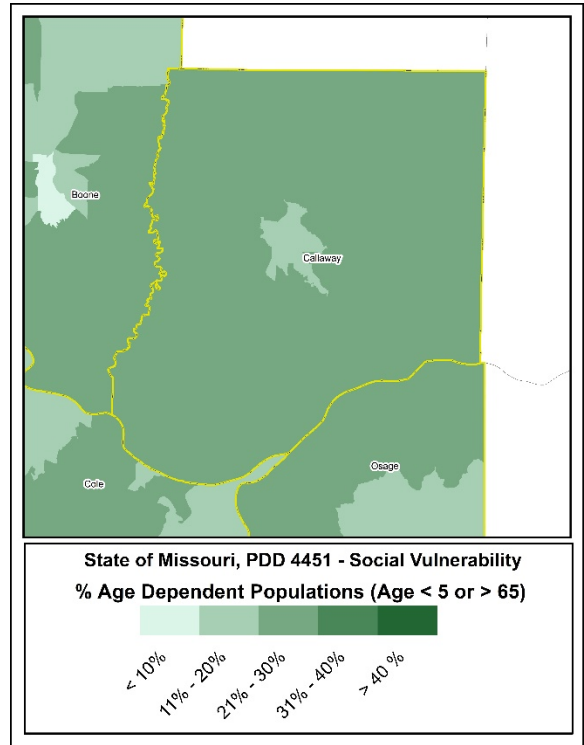
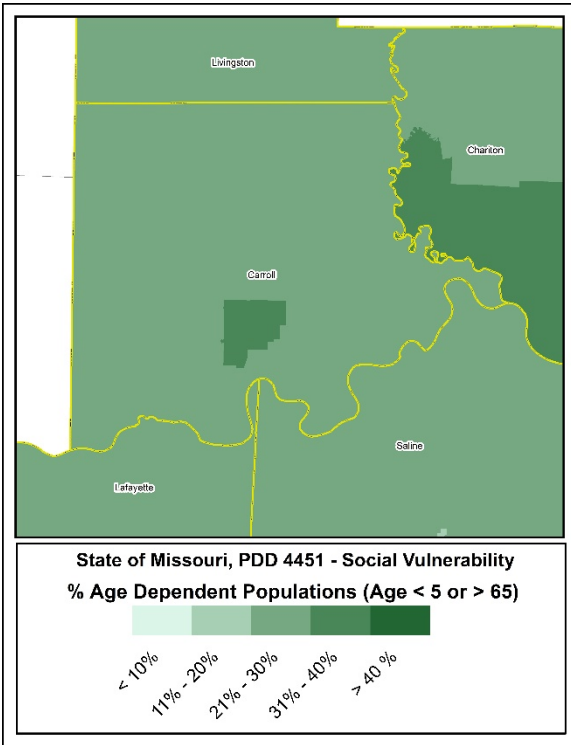




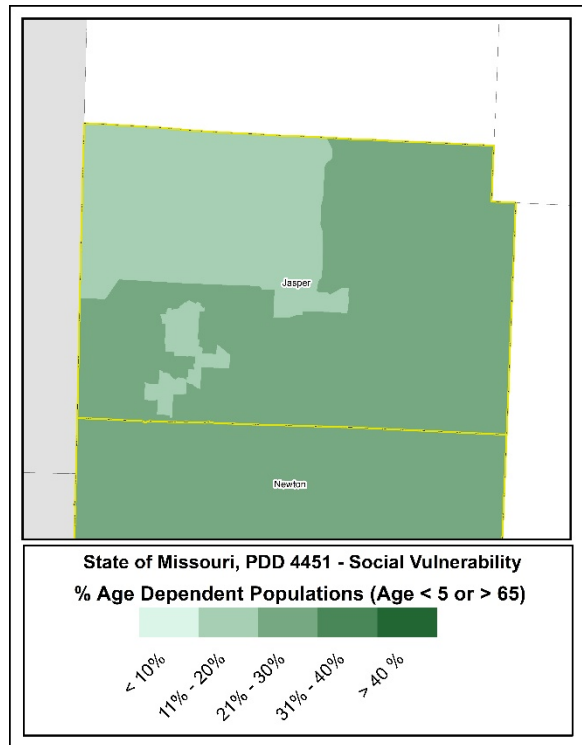
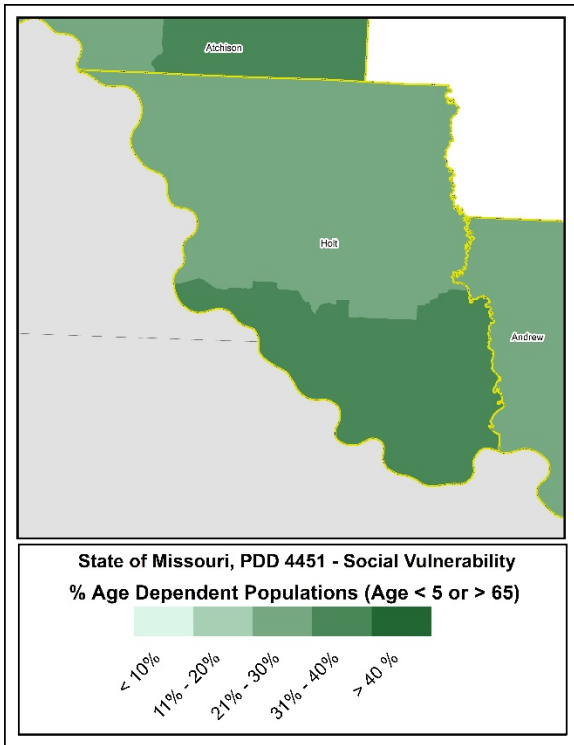
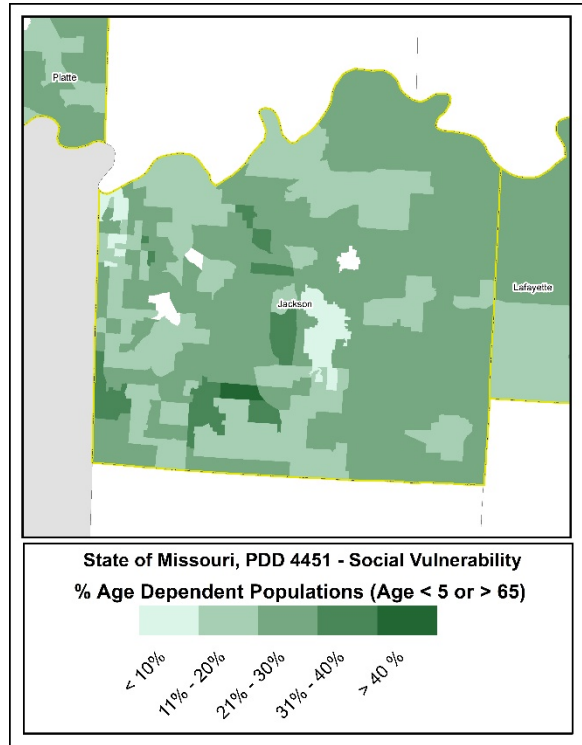
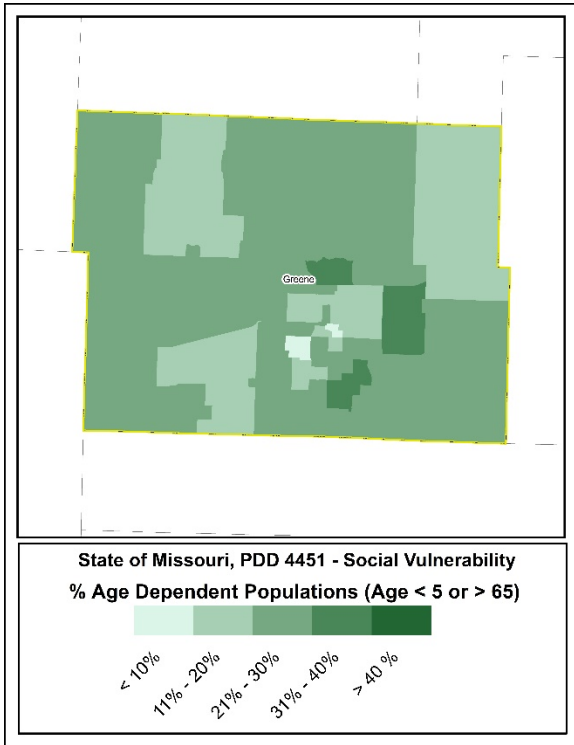


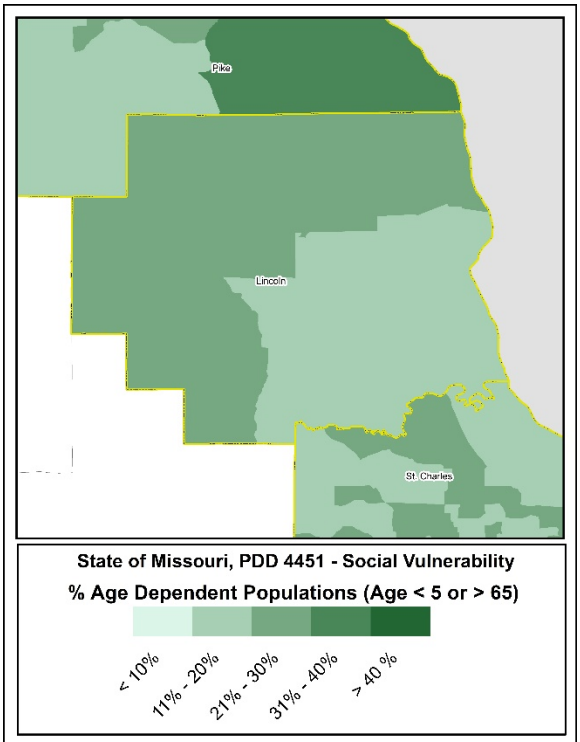
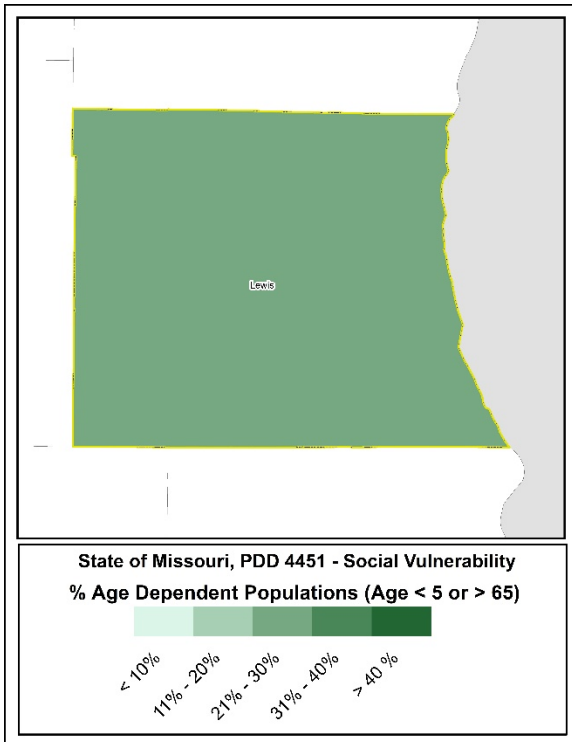
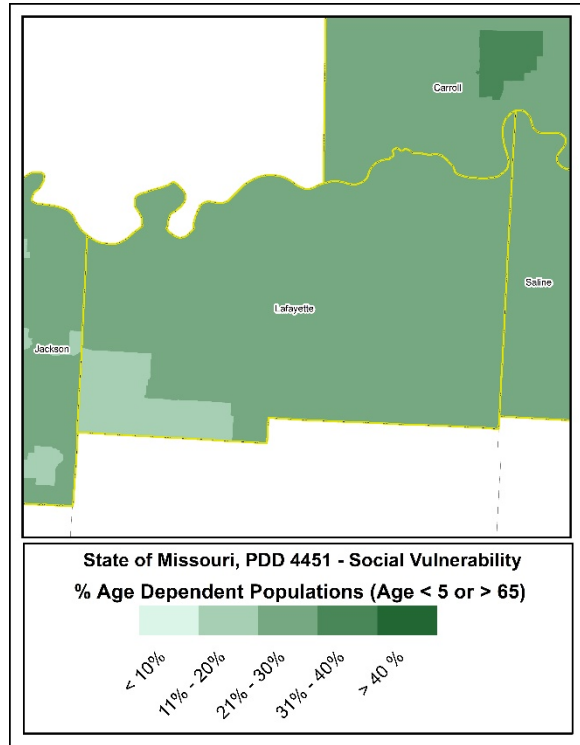
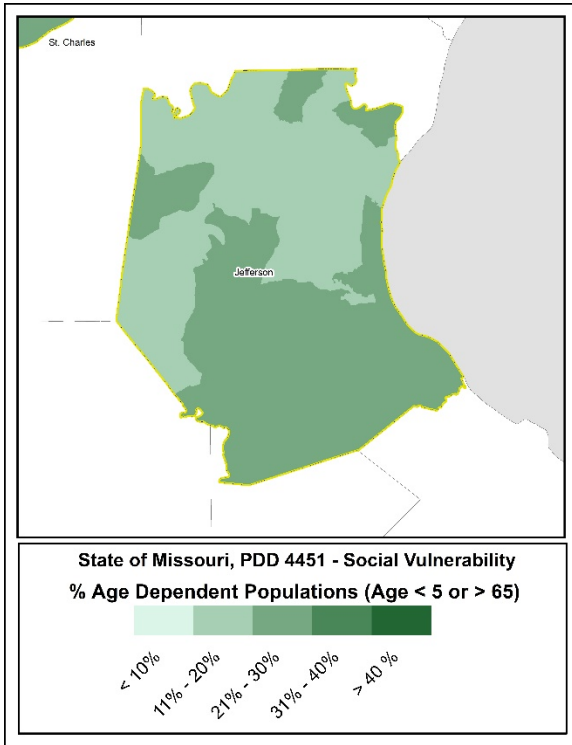
## APPENDIX F: DR-4451 COUNTY AGE DEPENDENT POPULATIONS

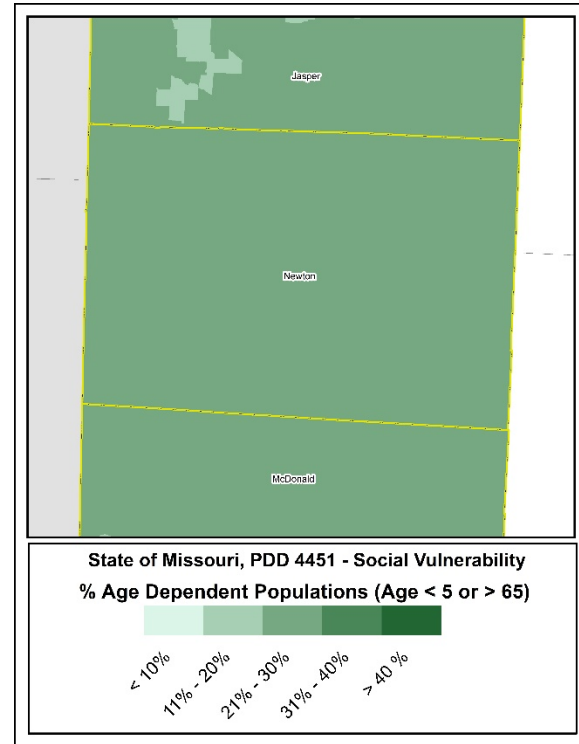
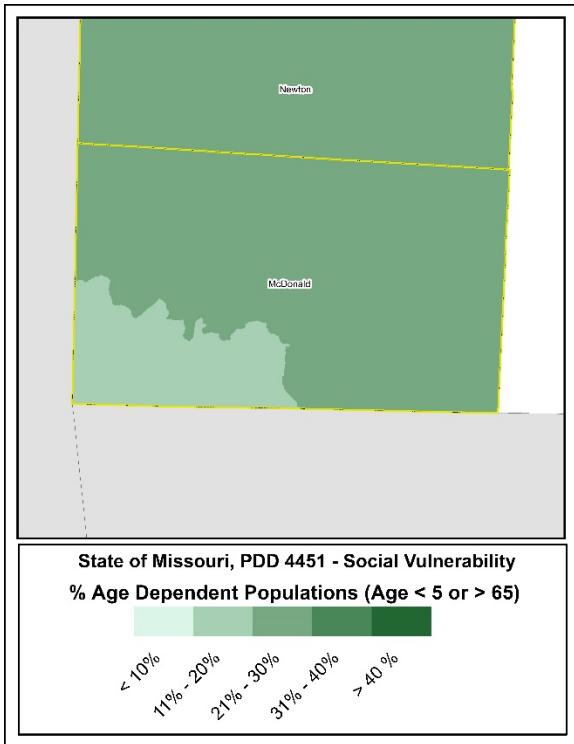
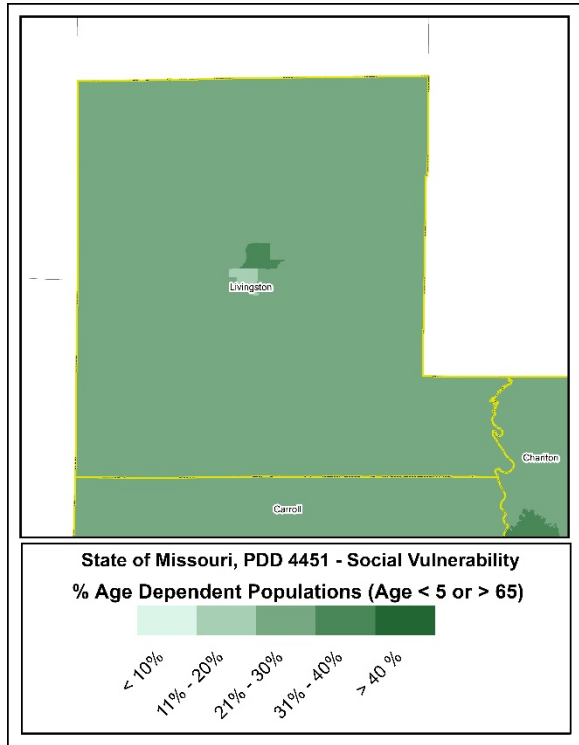
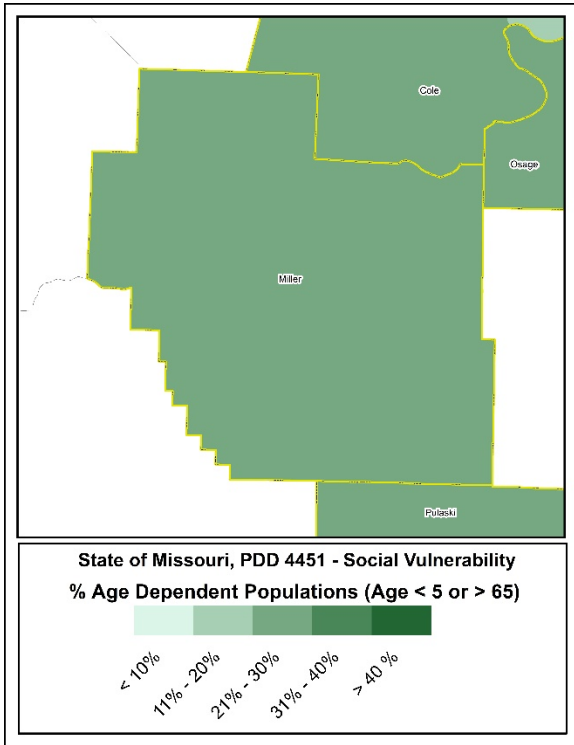


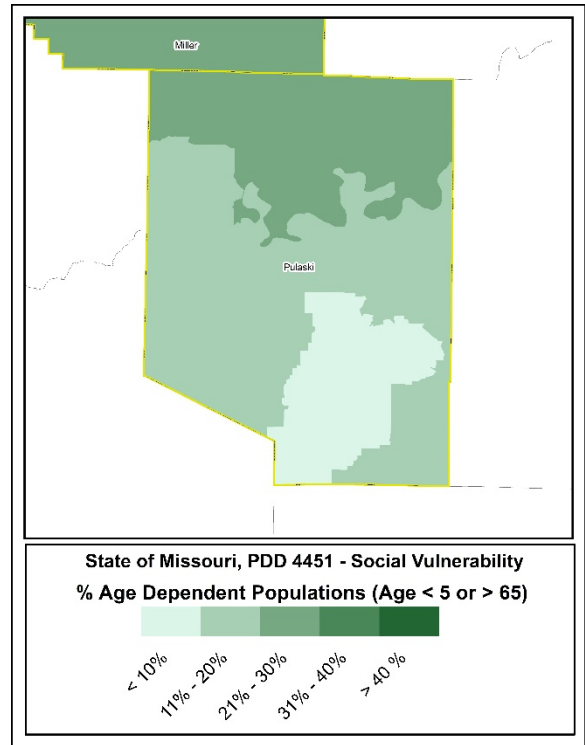
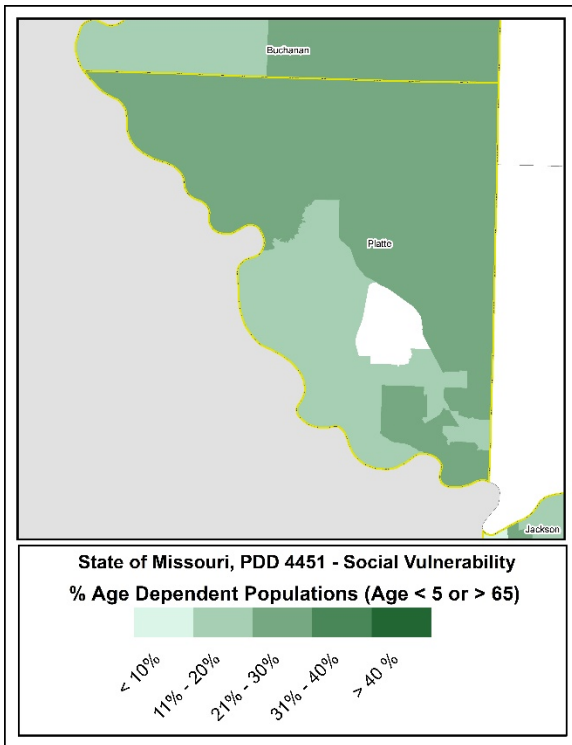
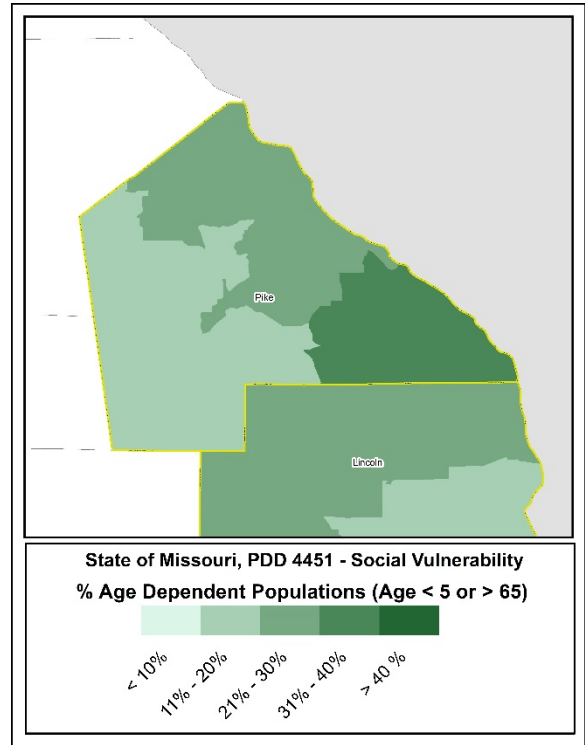
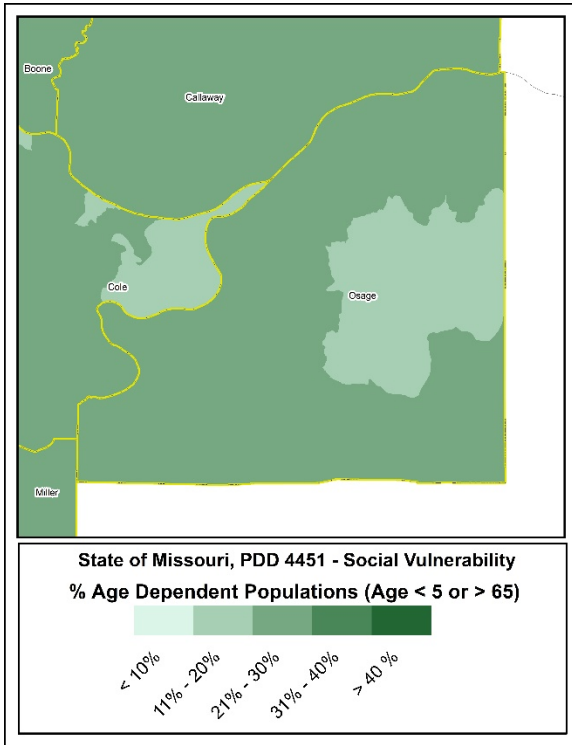


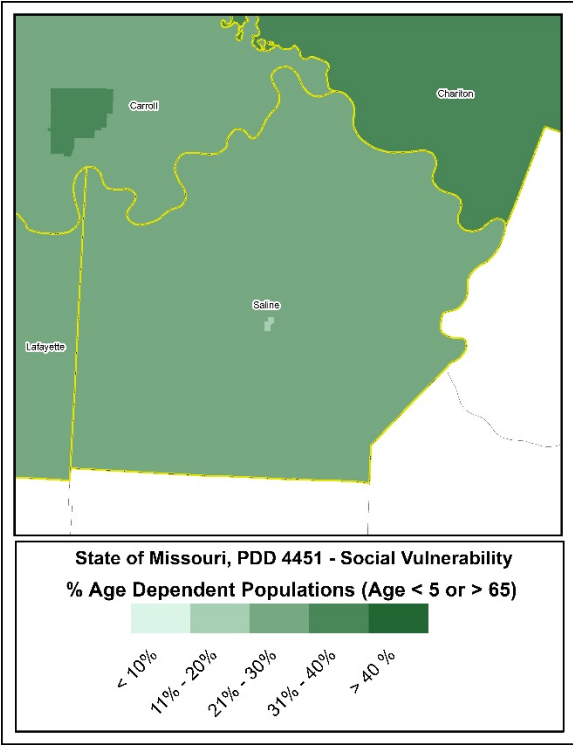




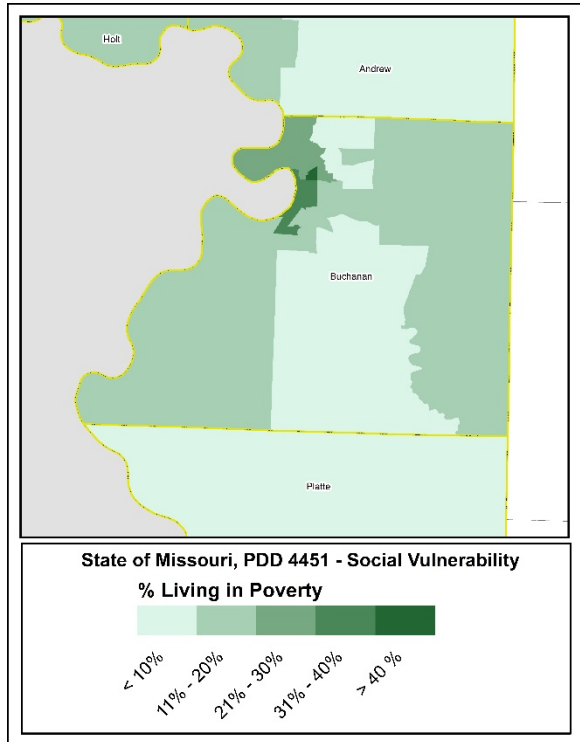
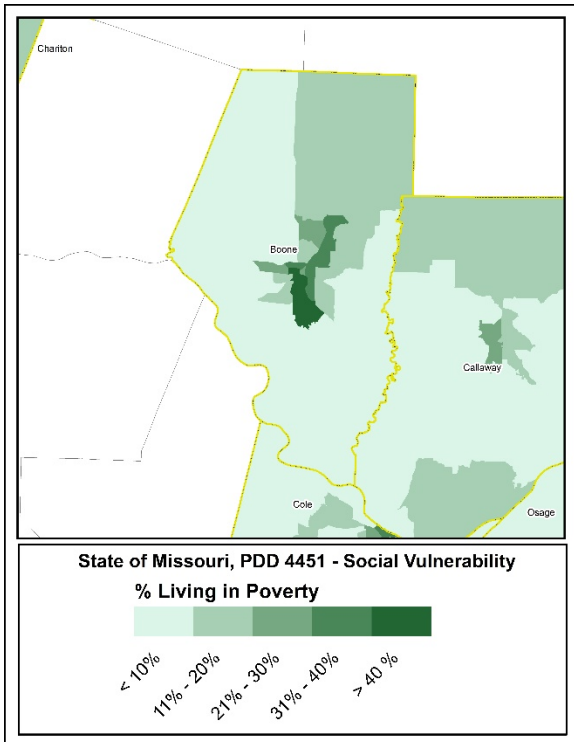
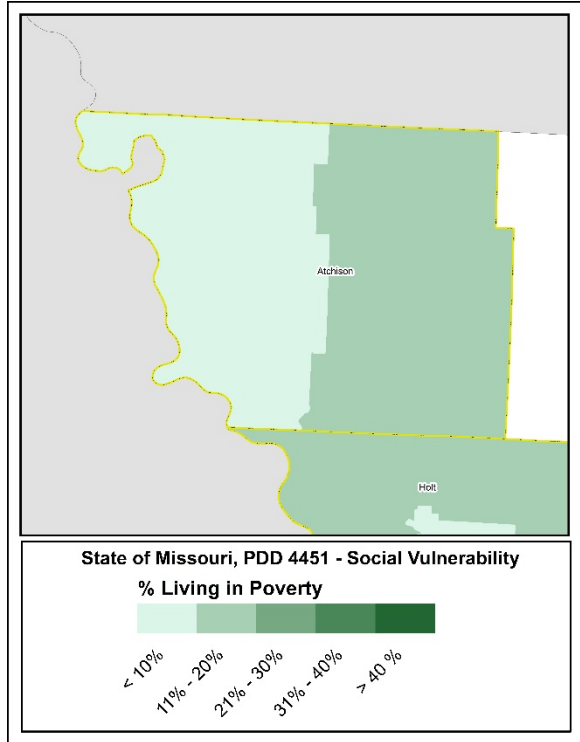
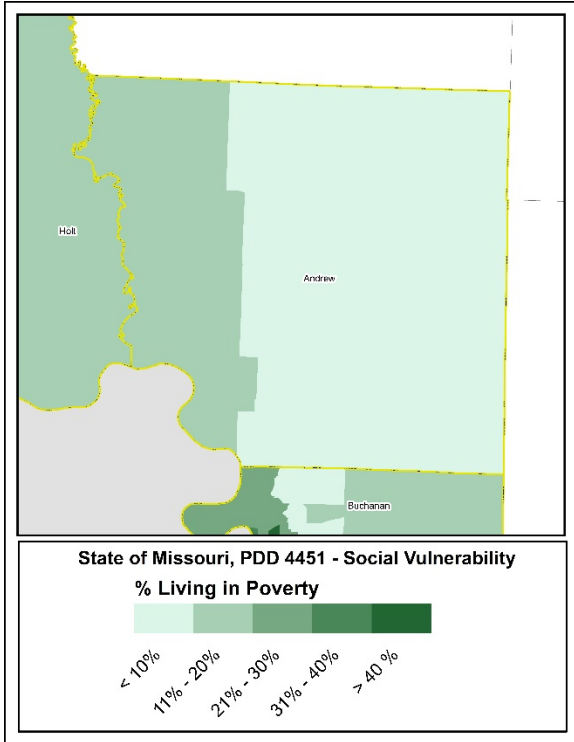


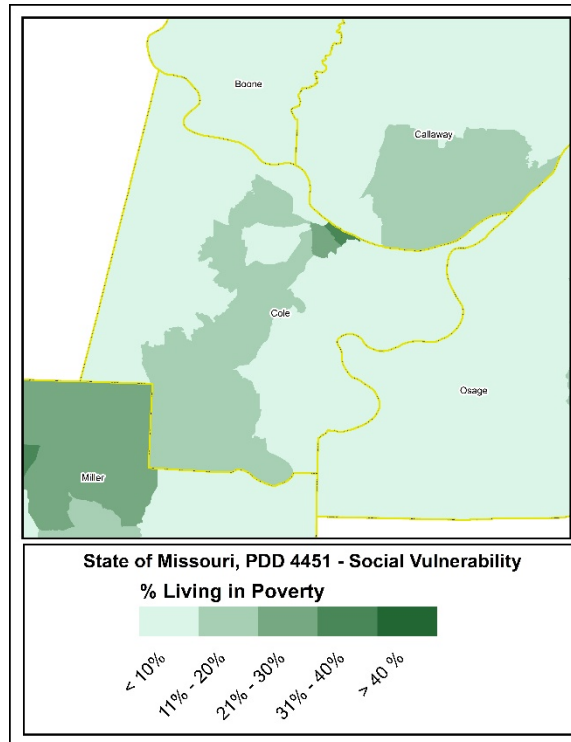
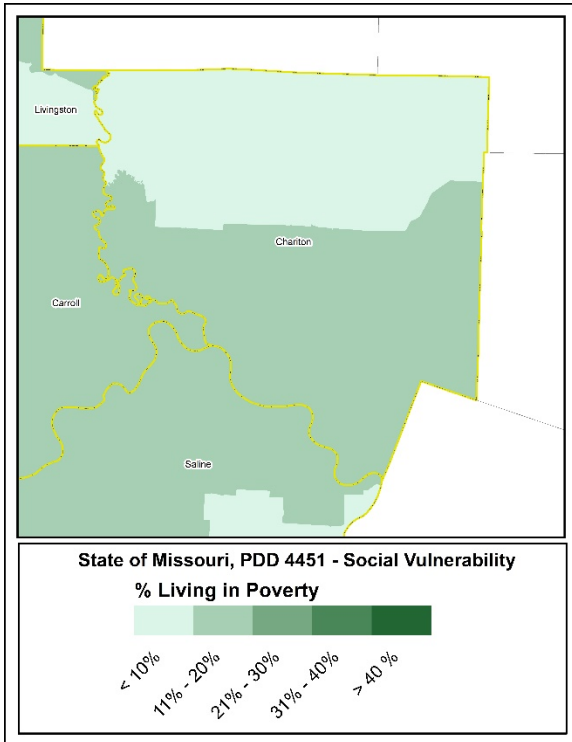
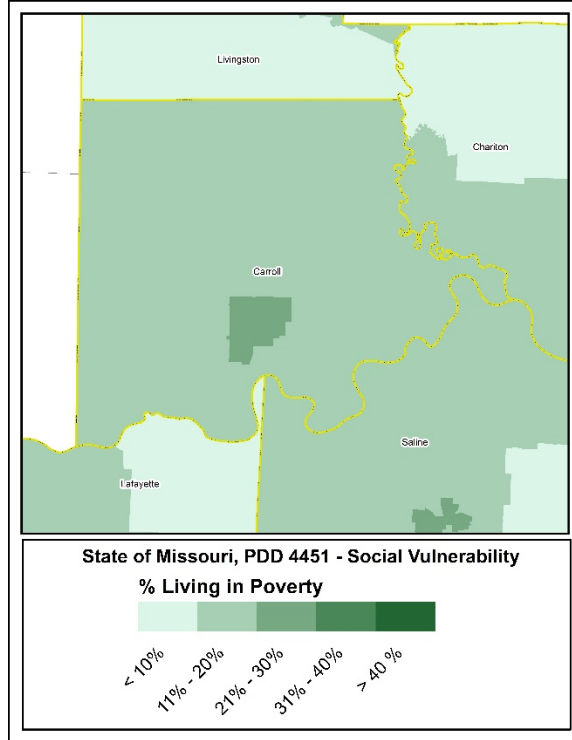
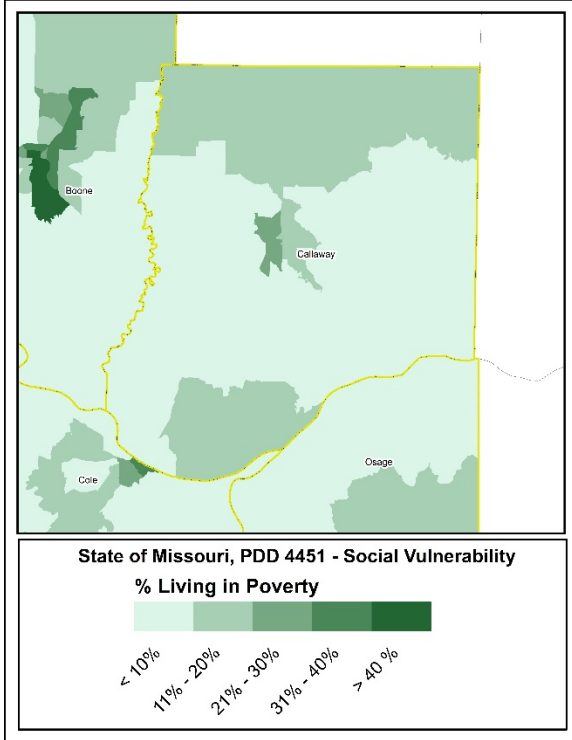


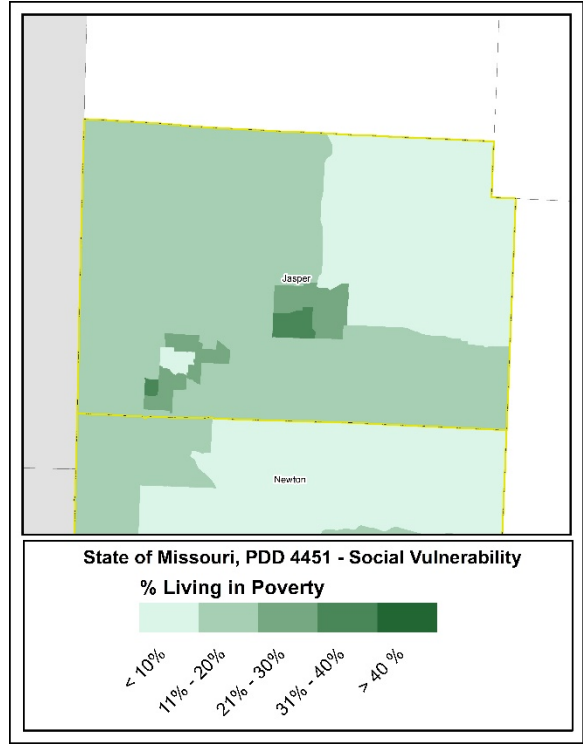
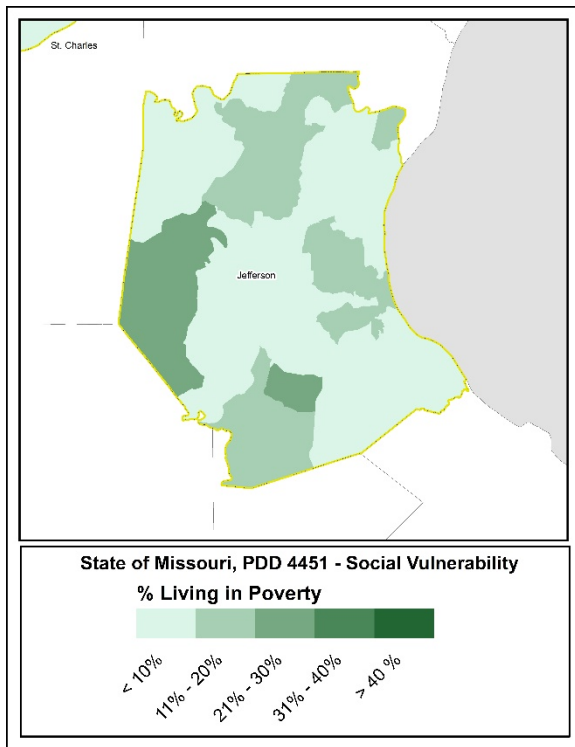
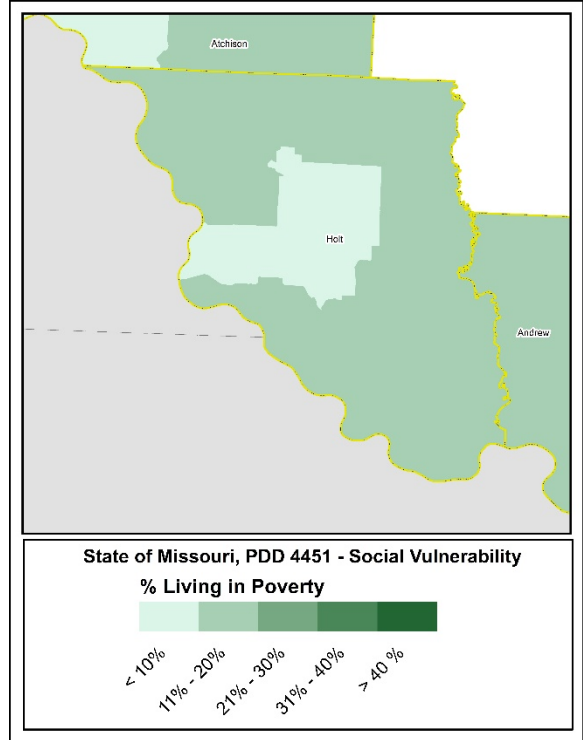
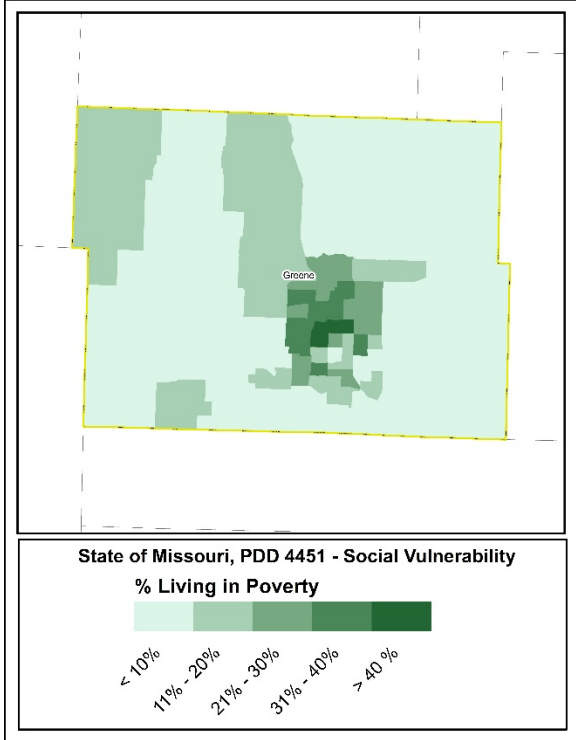




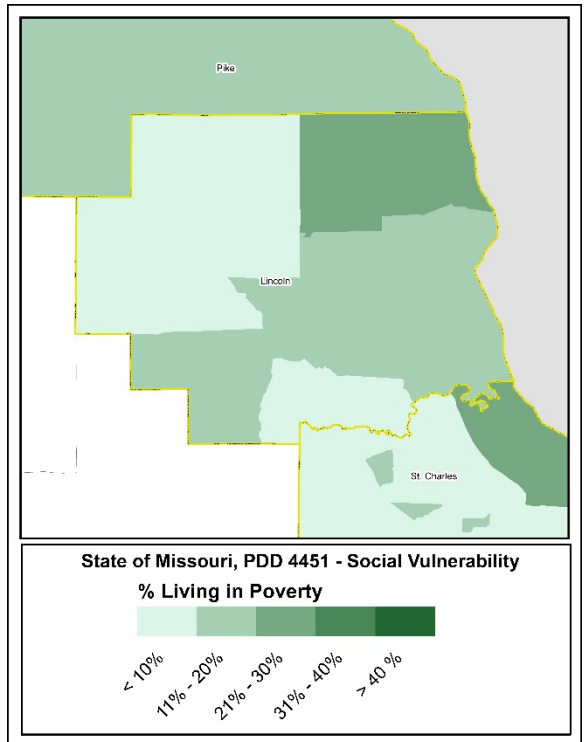
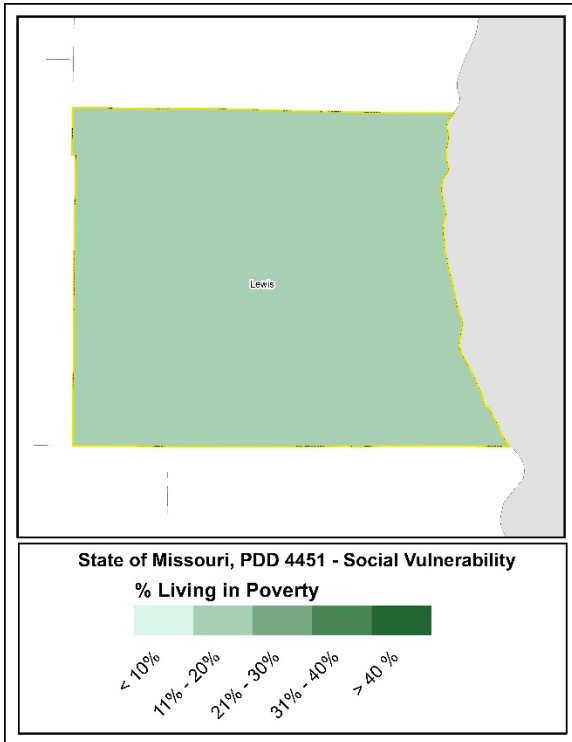
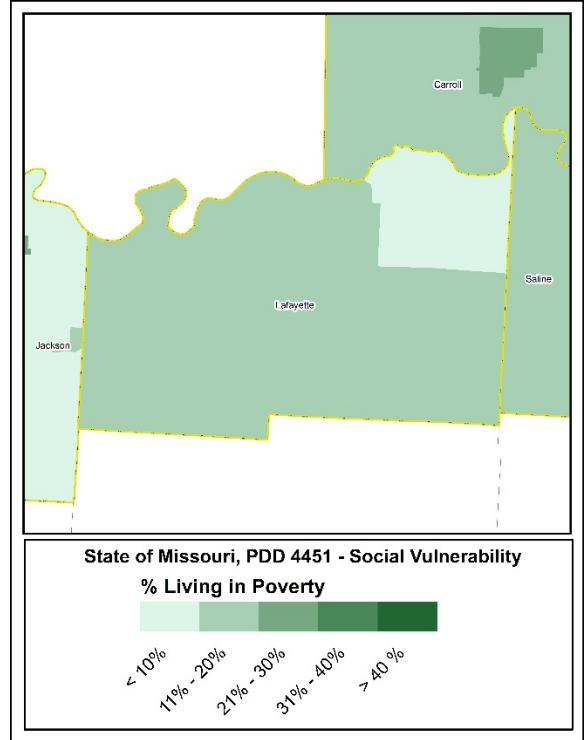
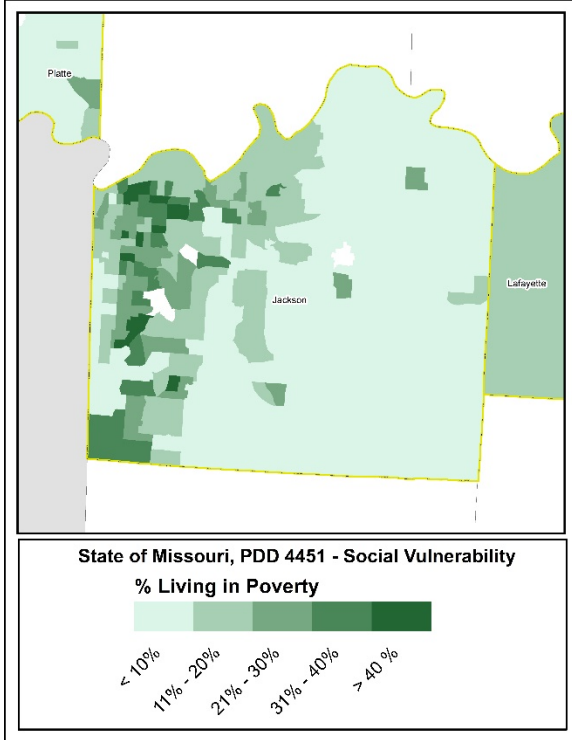
## APPENDIX G: DR-4451 COUNTY POVERTY

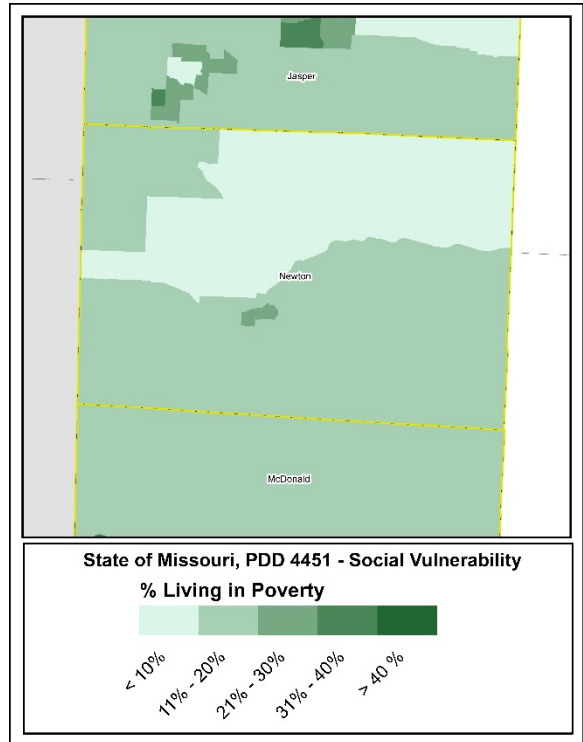
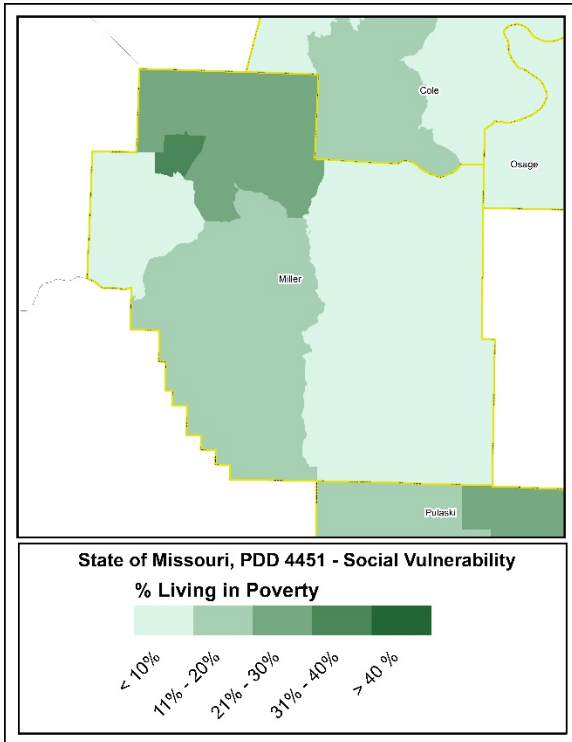
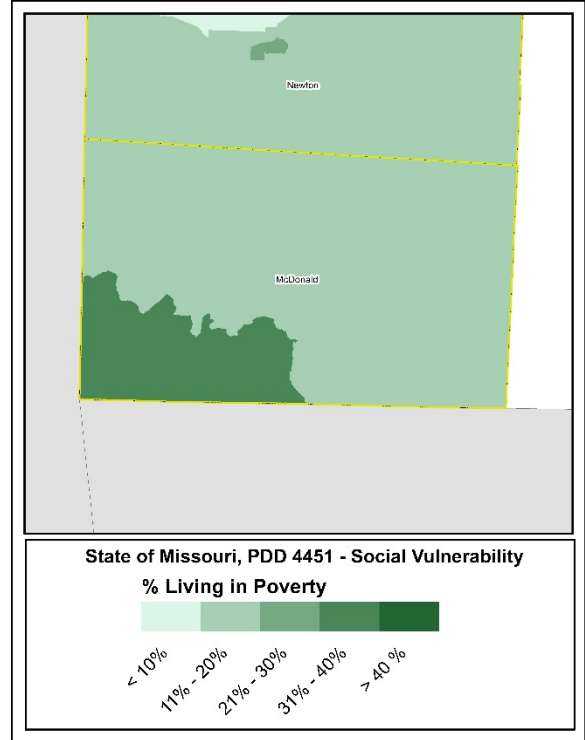
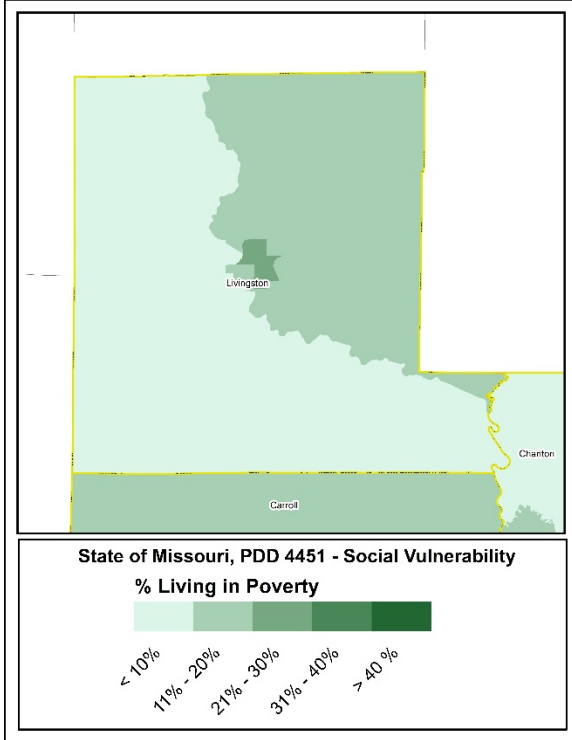


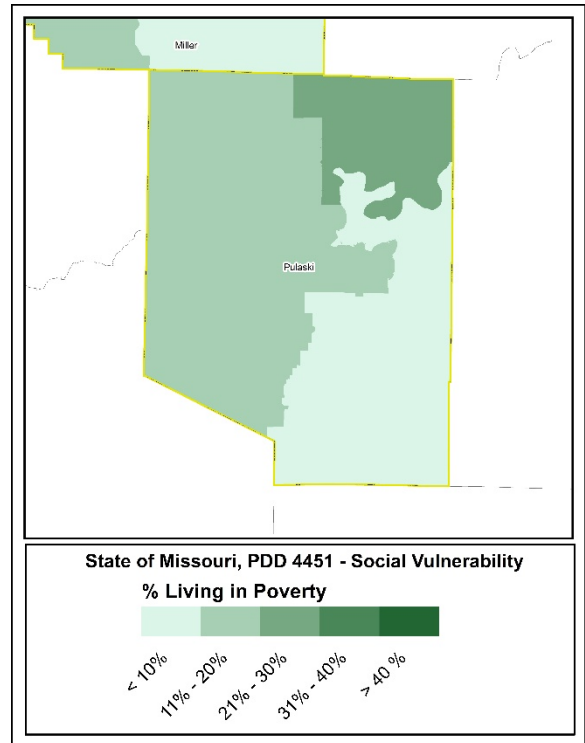
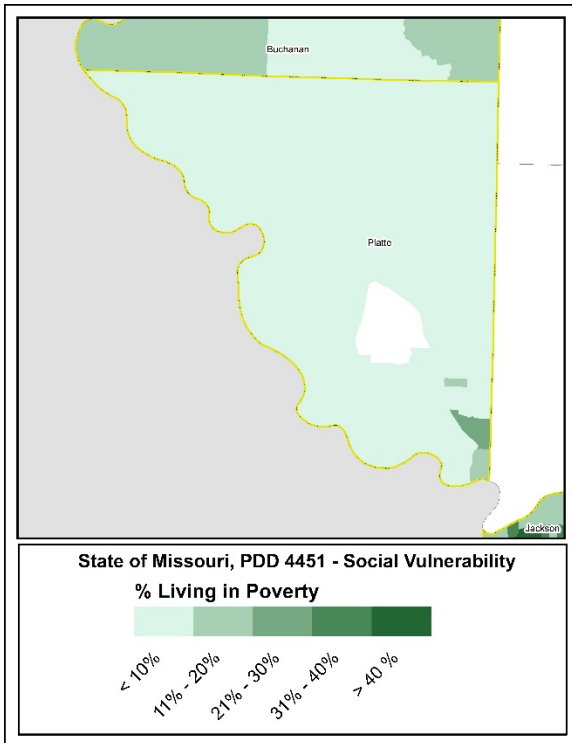
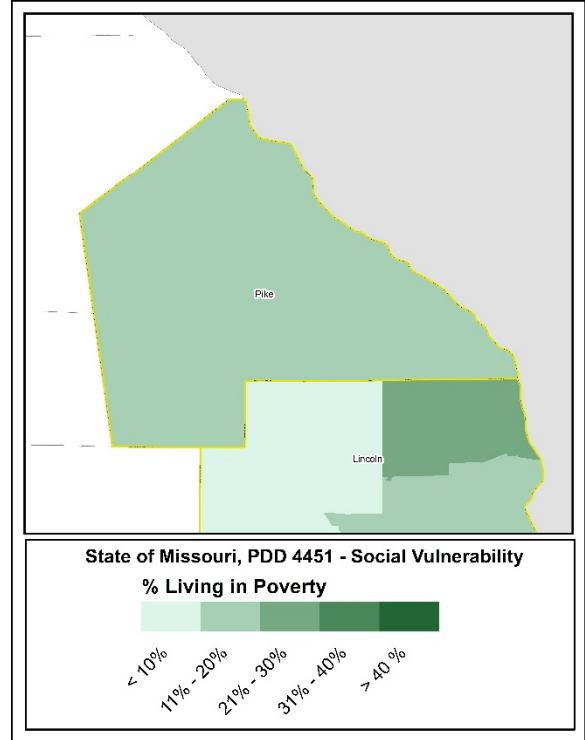
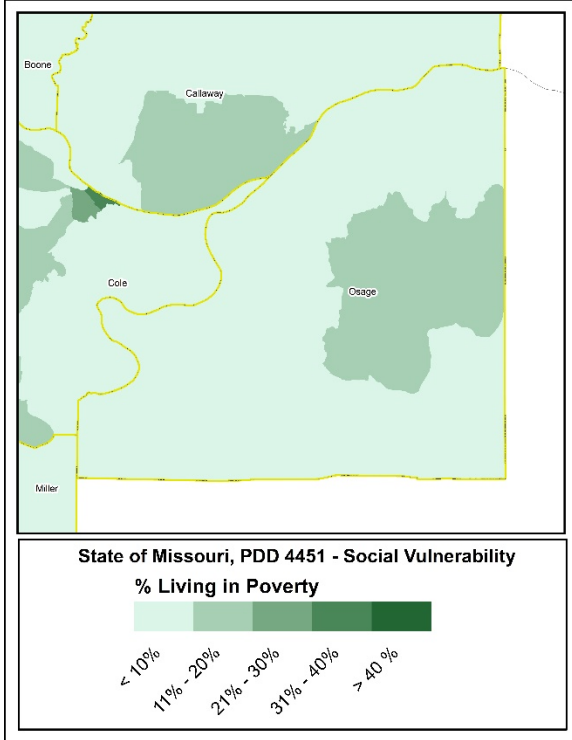


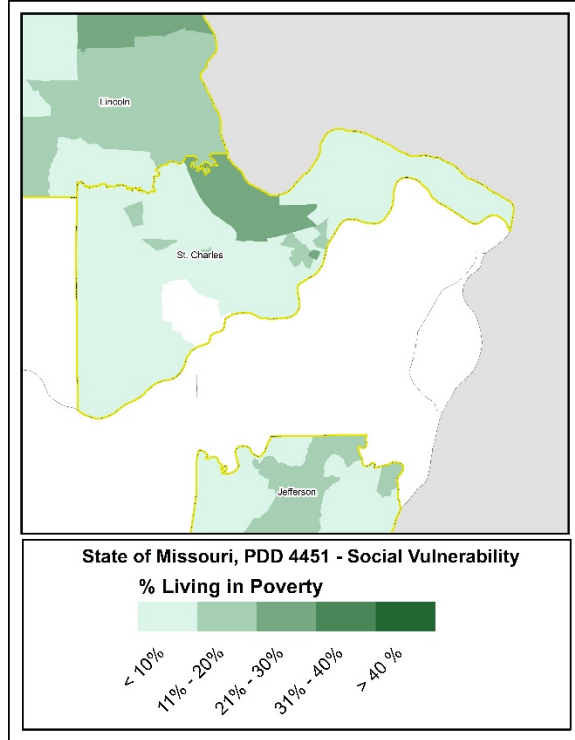
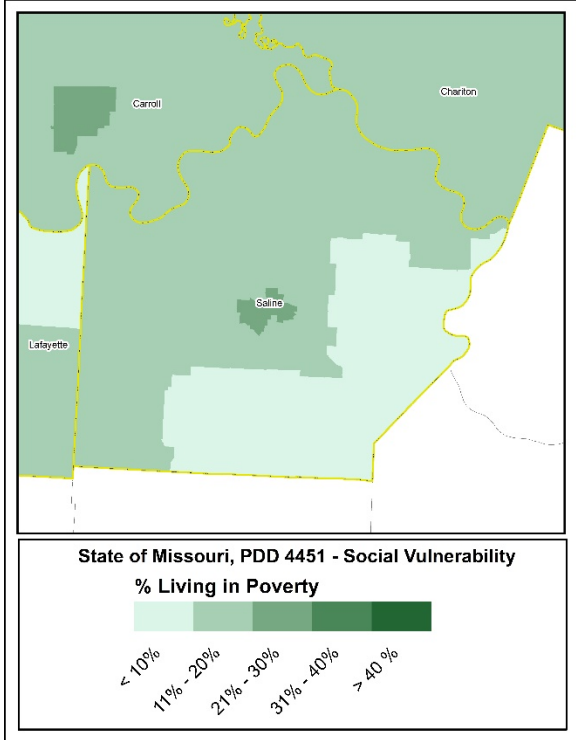




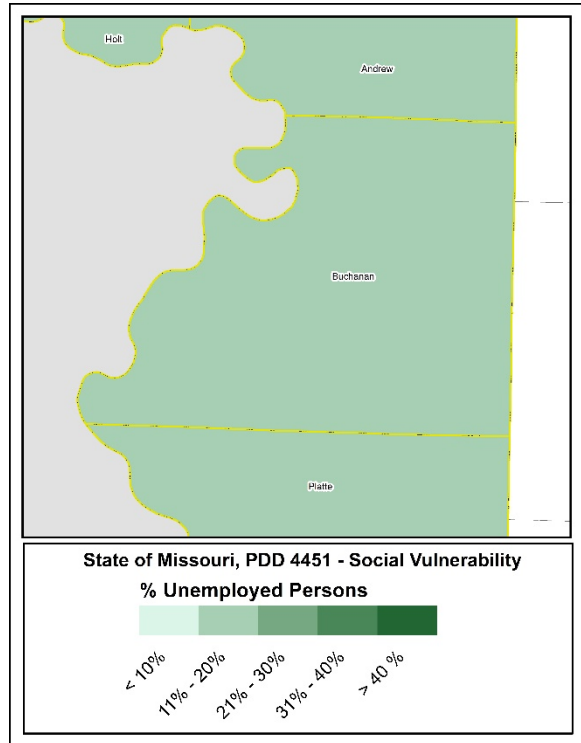
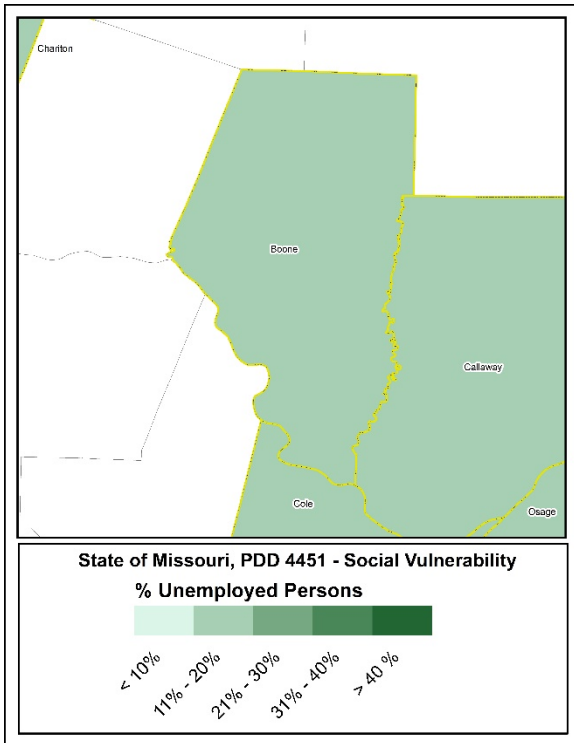
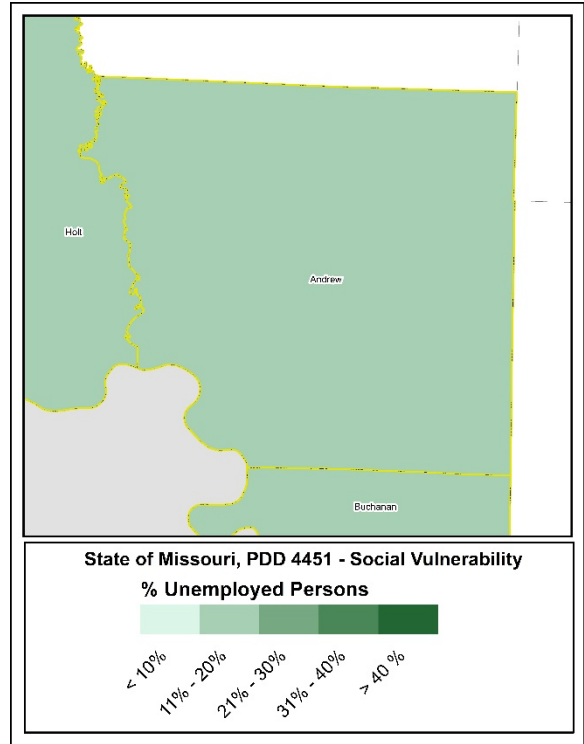
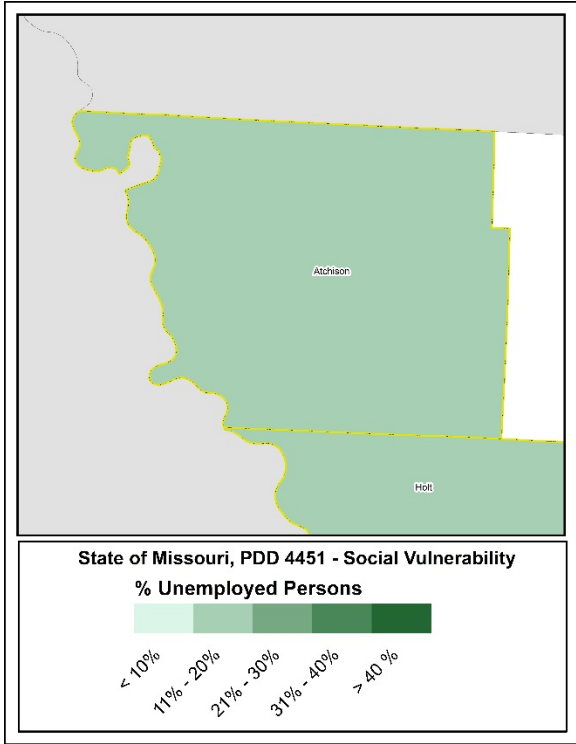


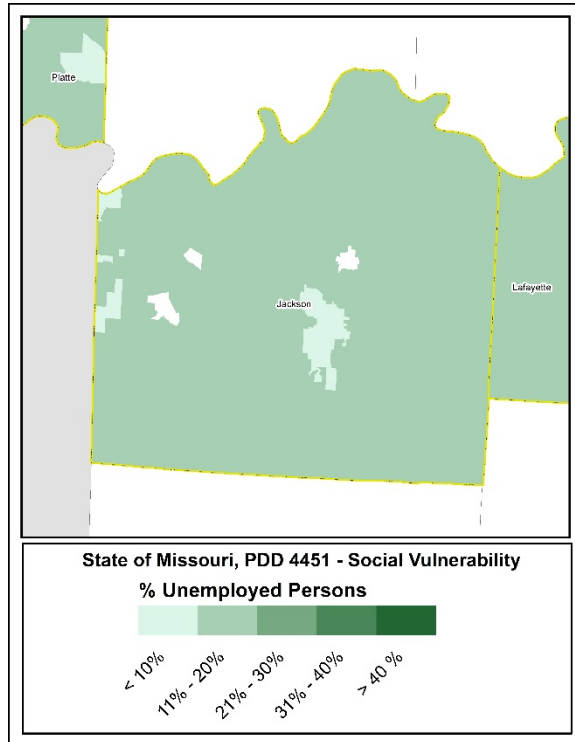
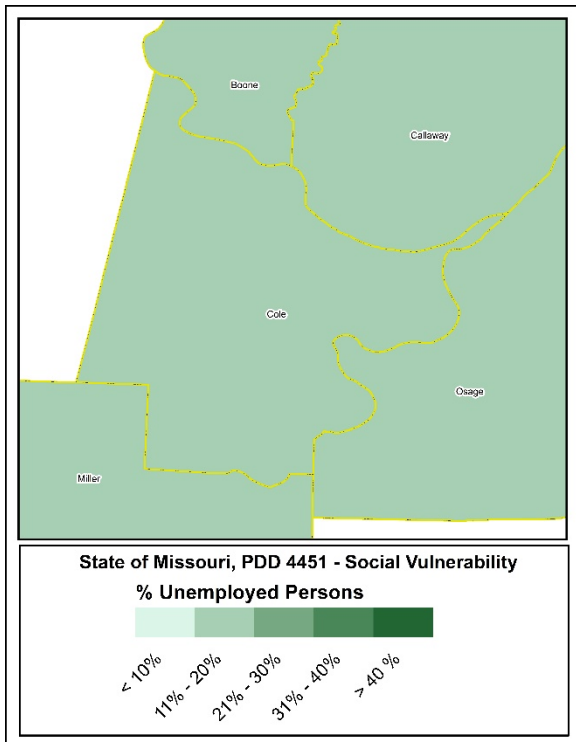
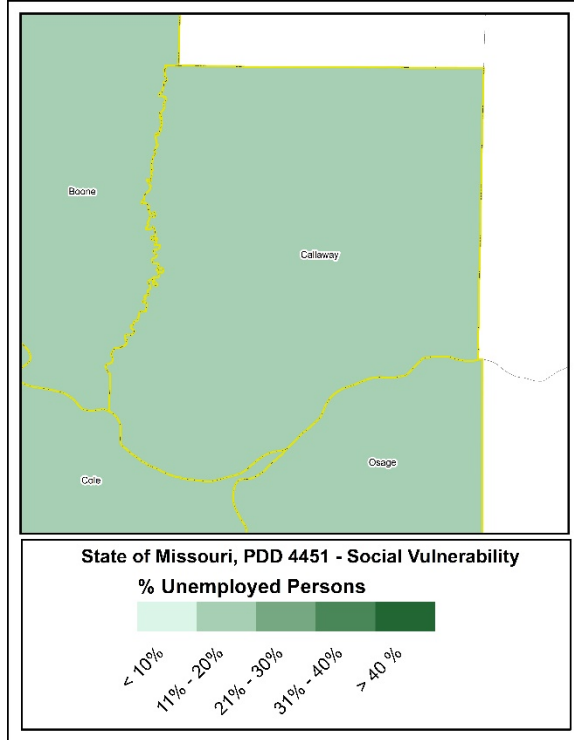
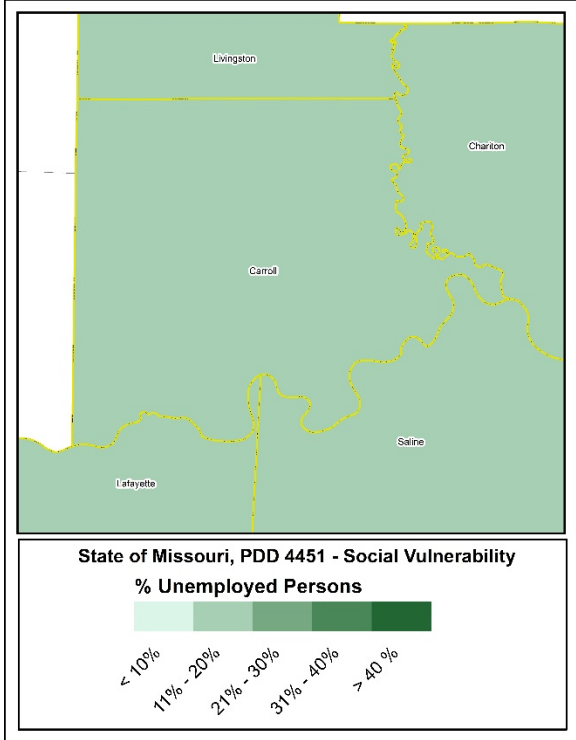


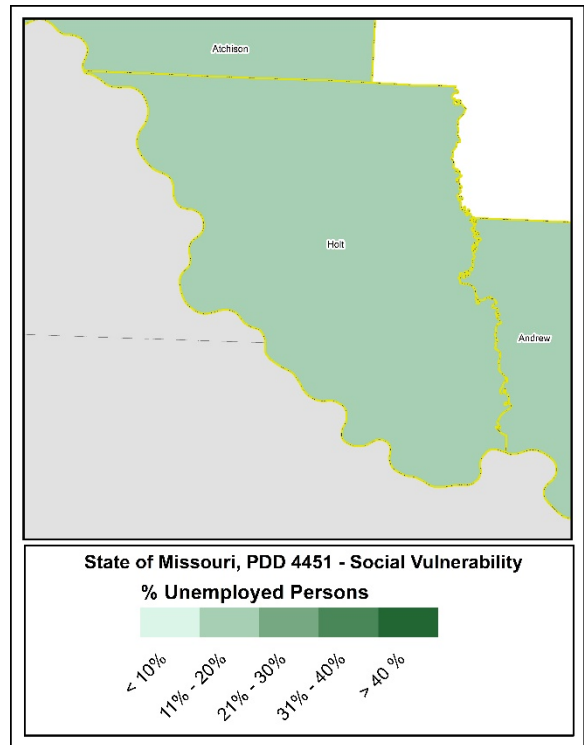
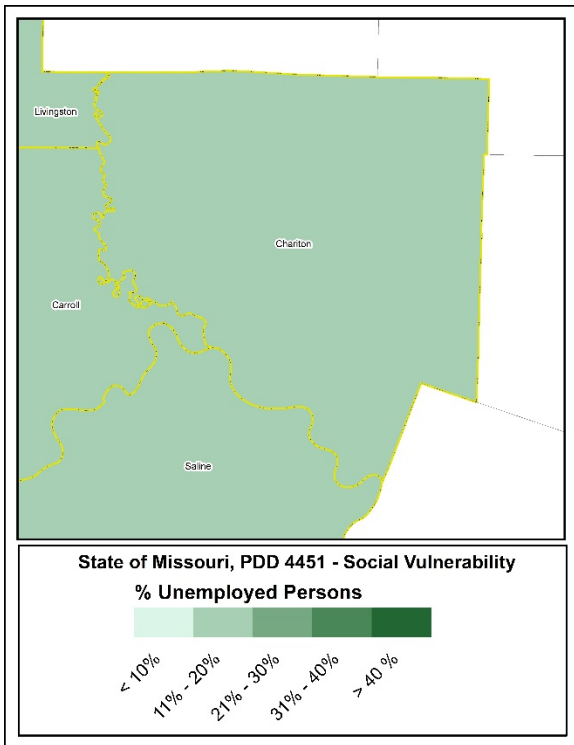
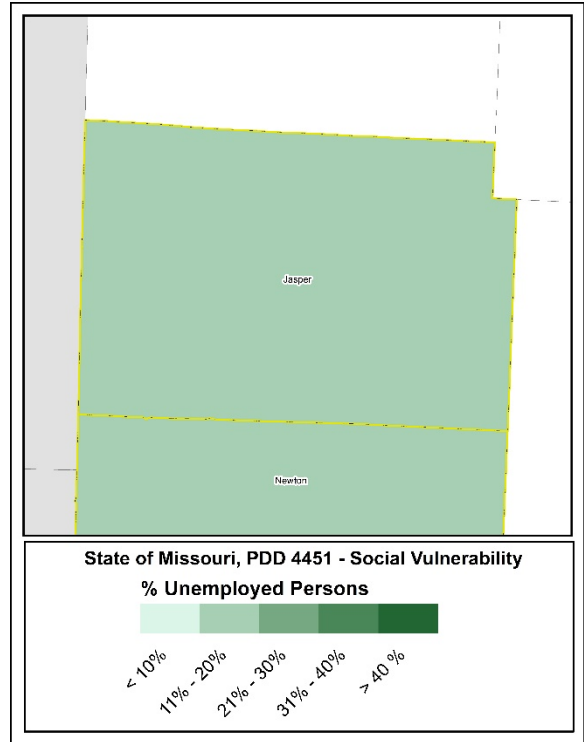
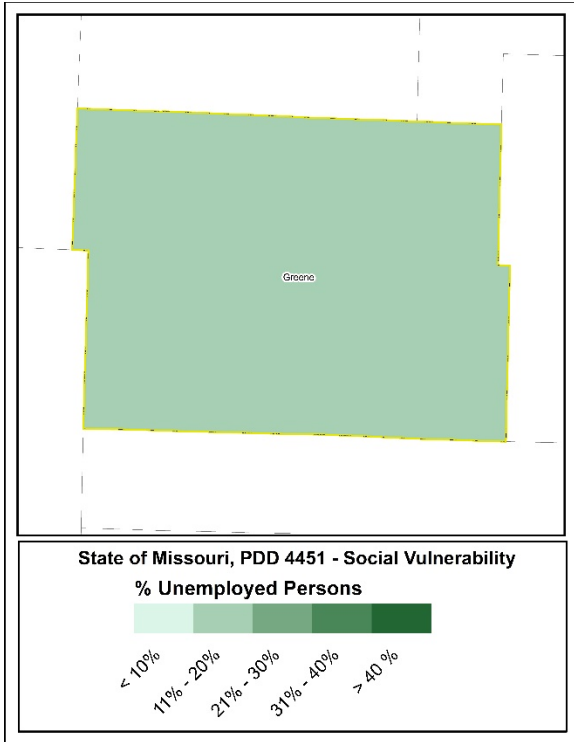


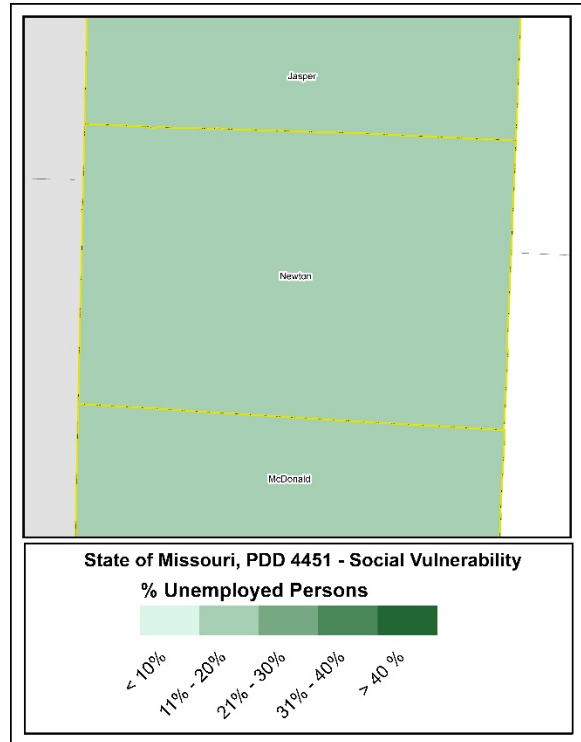
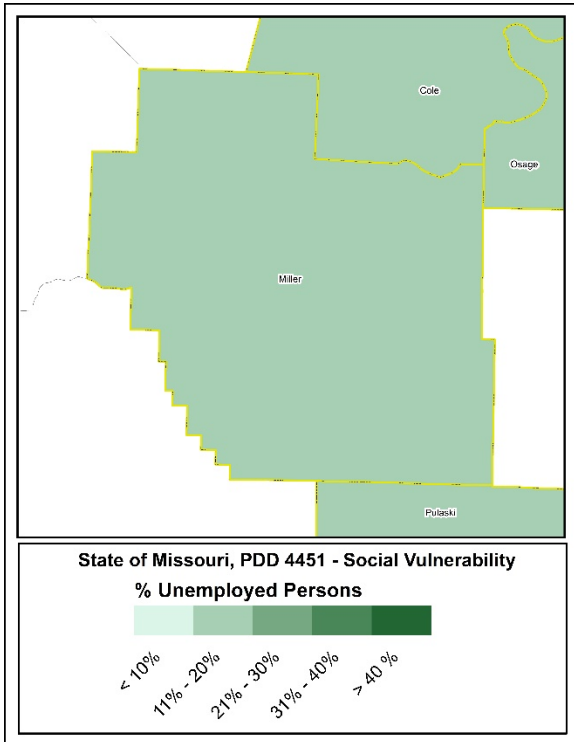
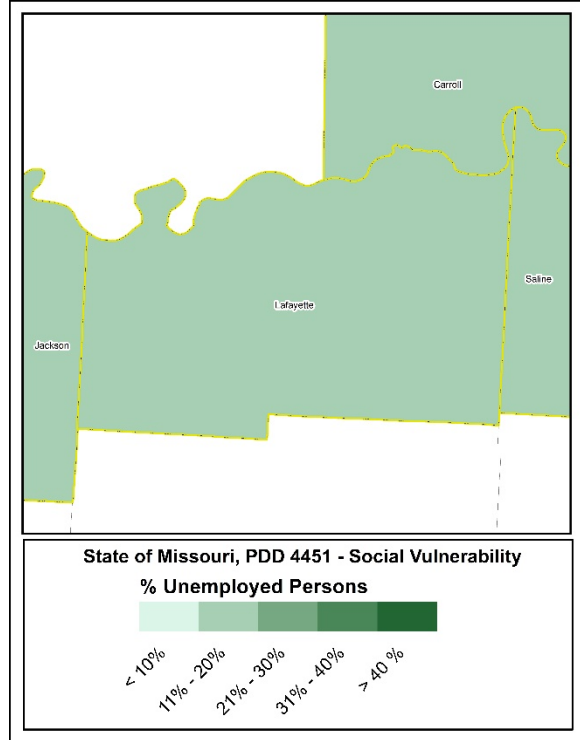
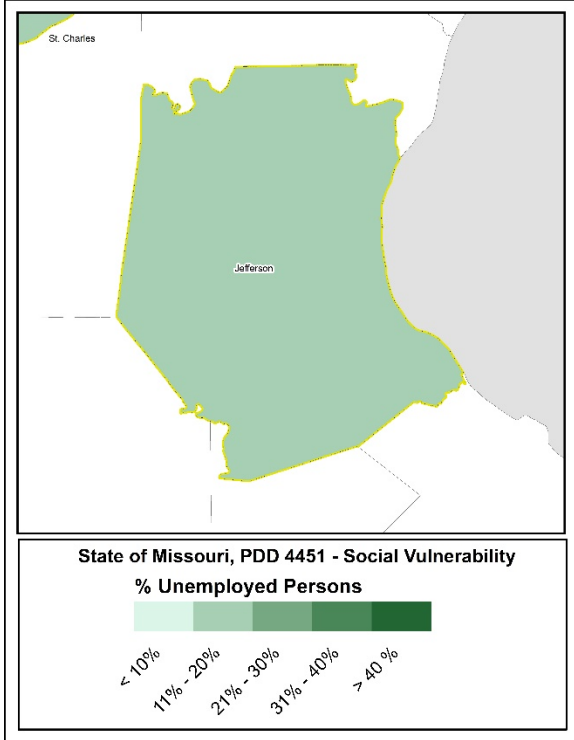


APPENDIX H: DR-4451 COUNTY UNEMPLOYMENT

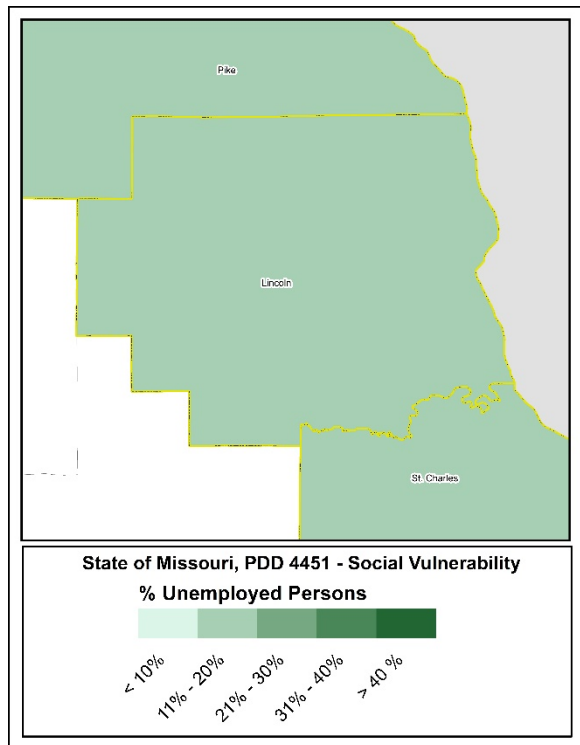
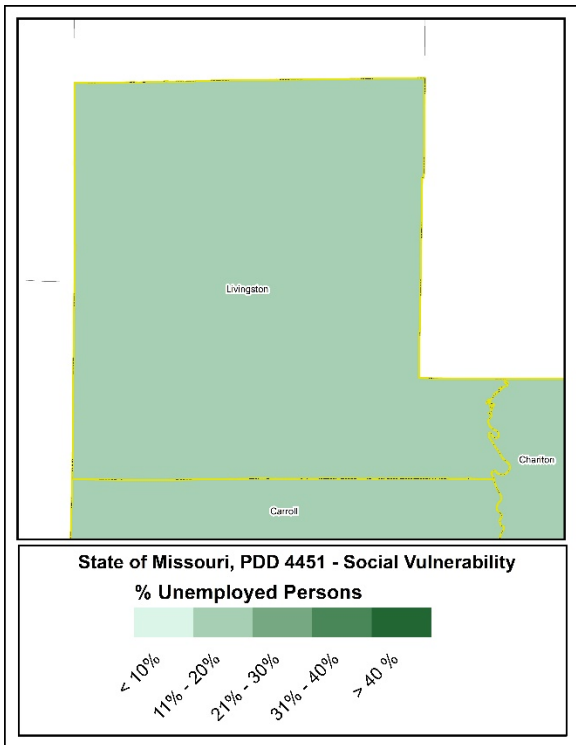
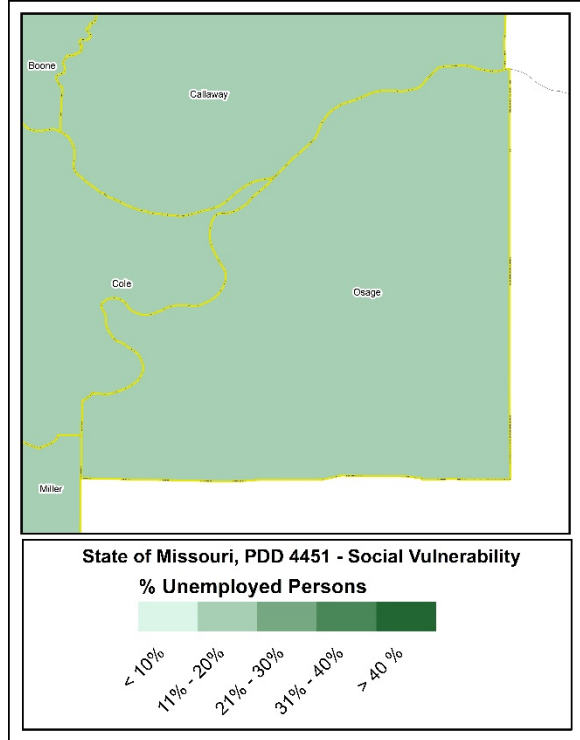
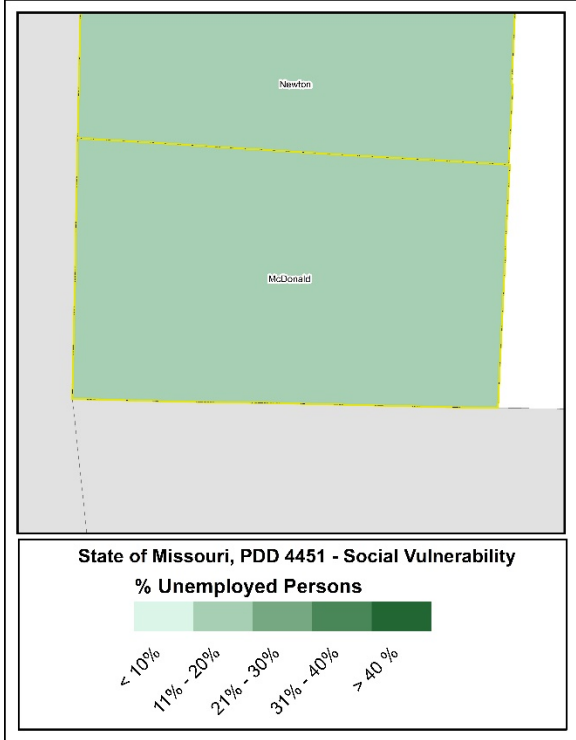


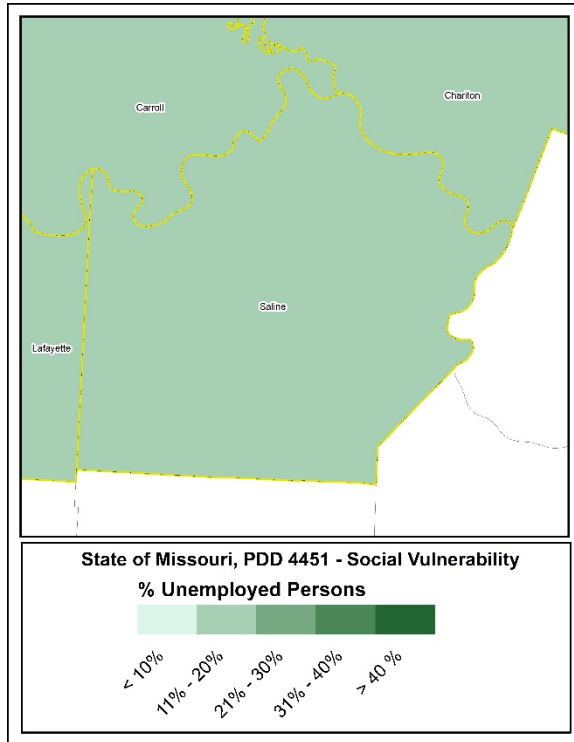
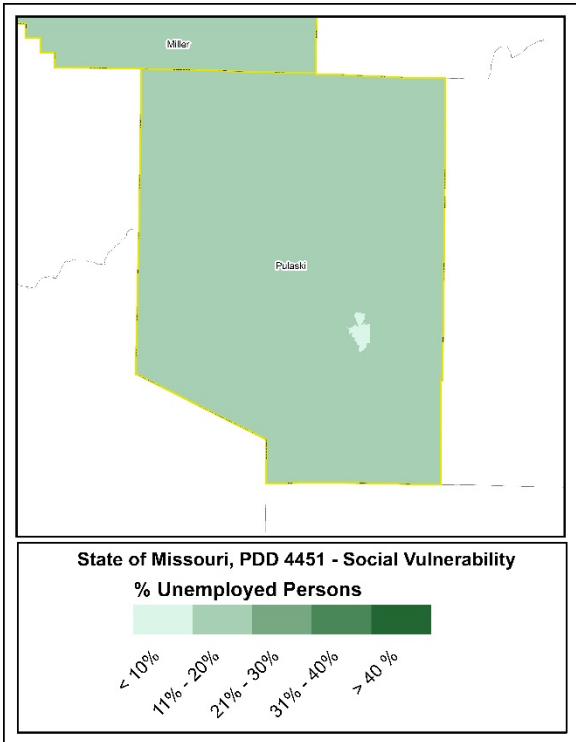
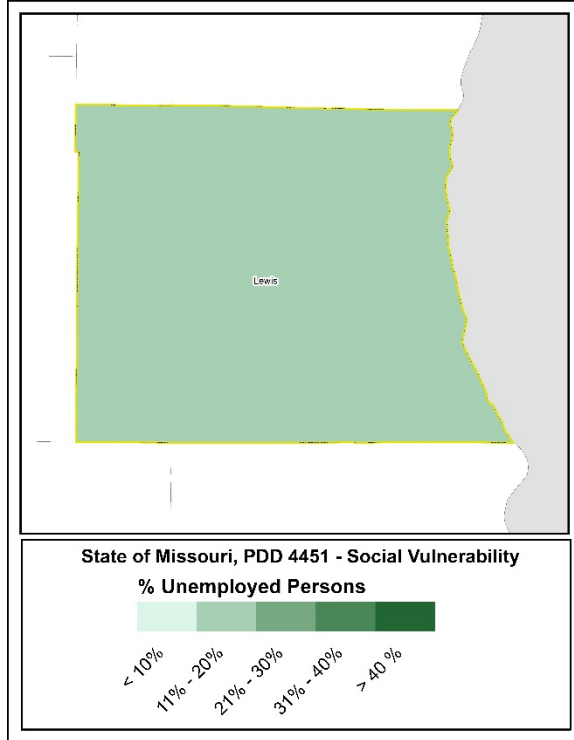
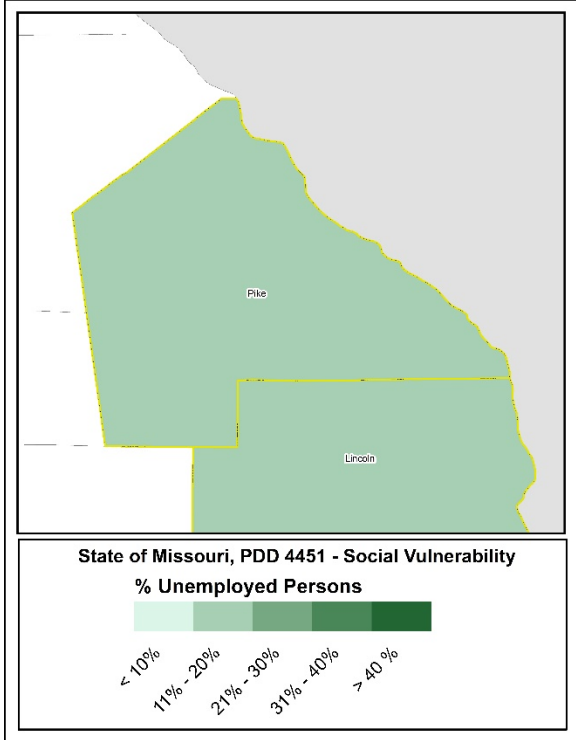


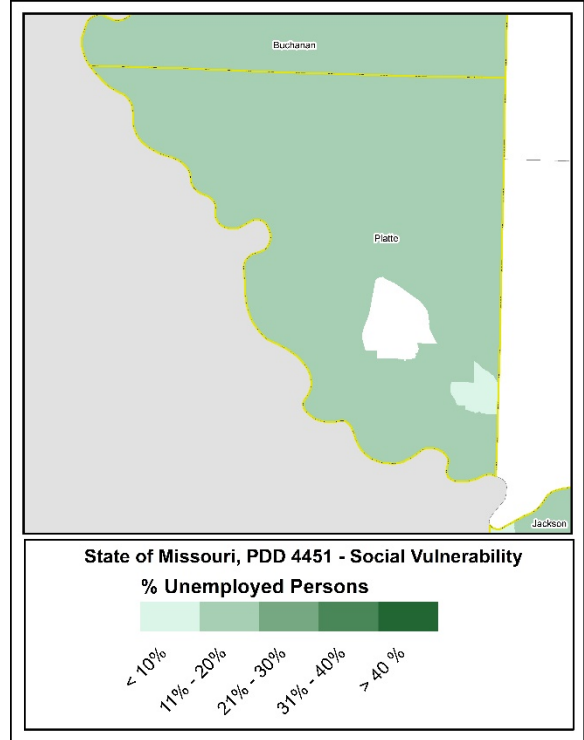
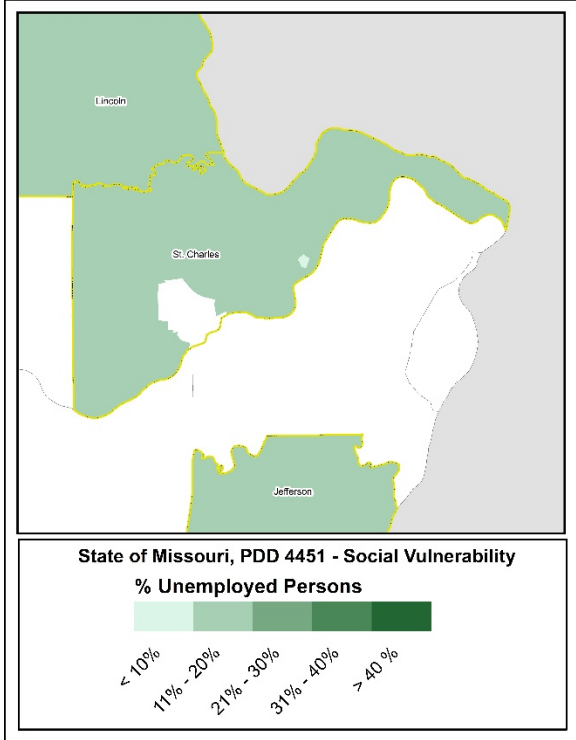




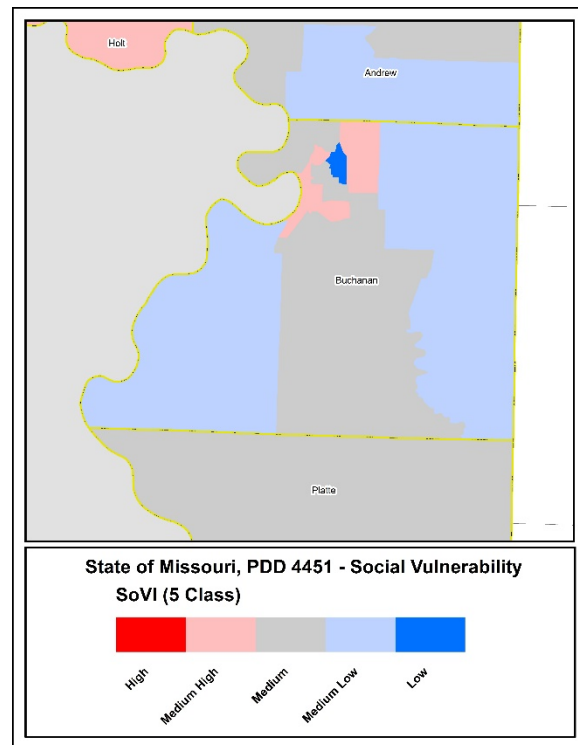
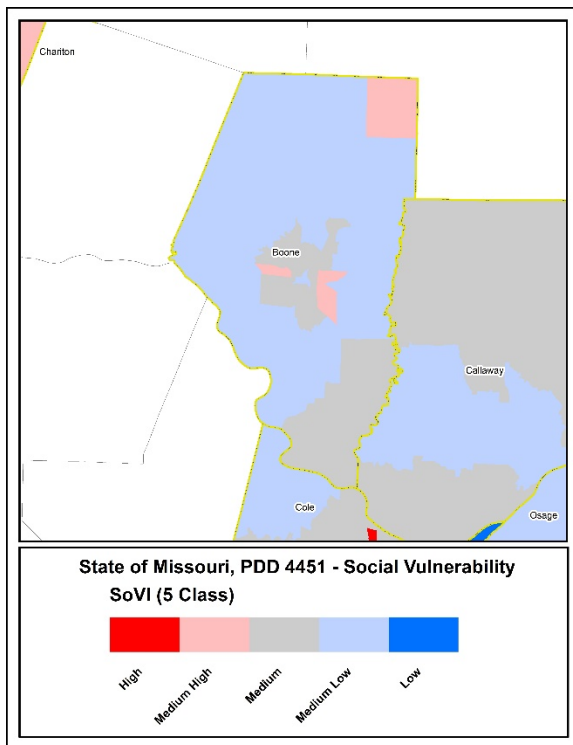
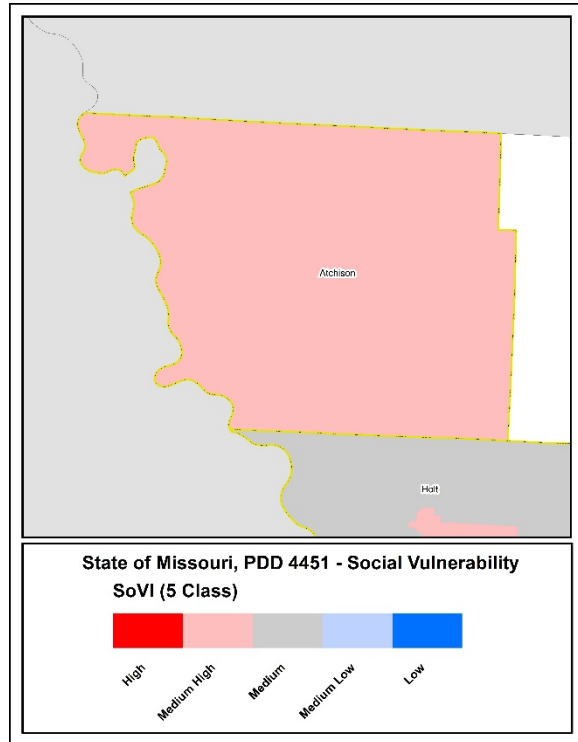
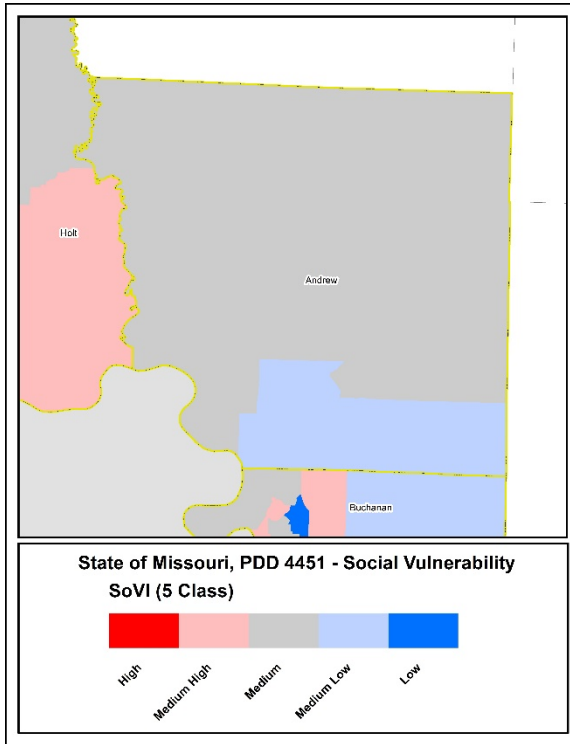


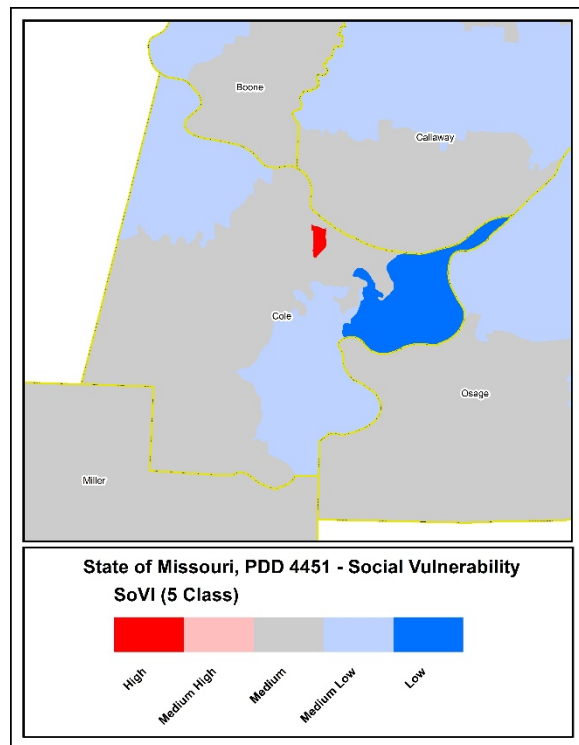
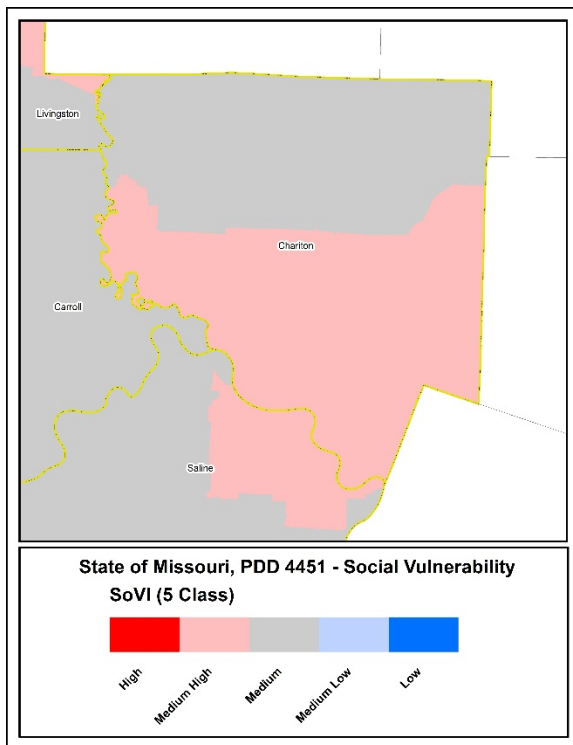
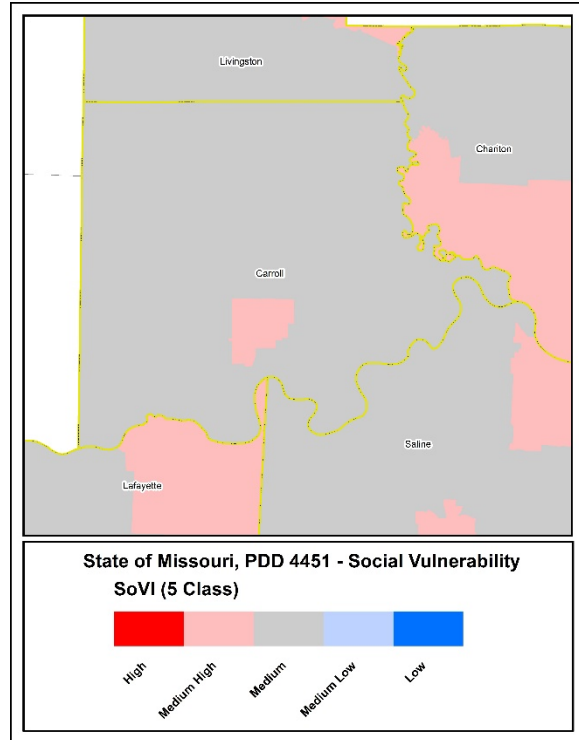
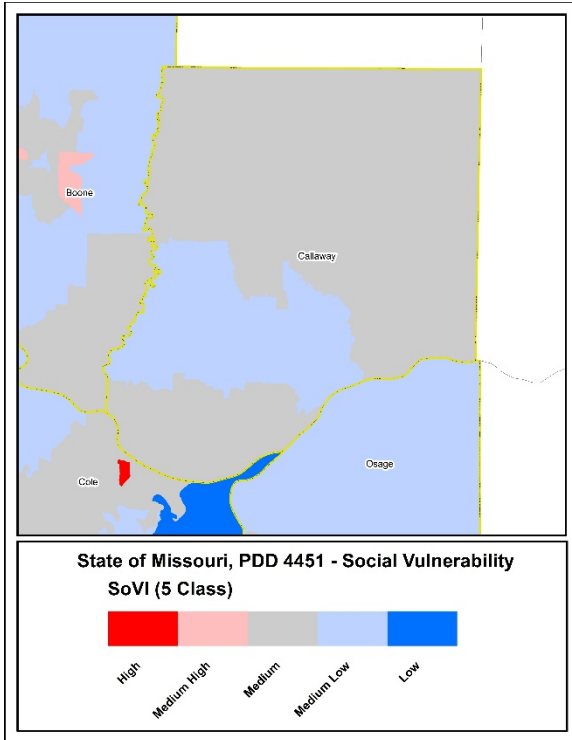


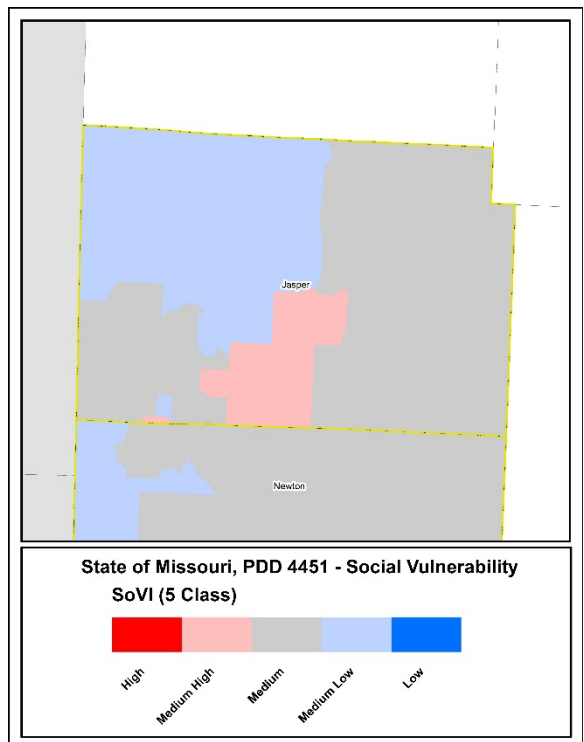
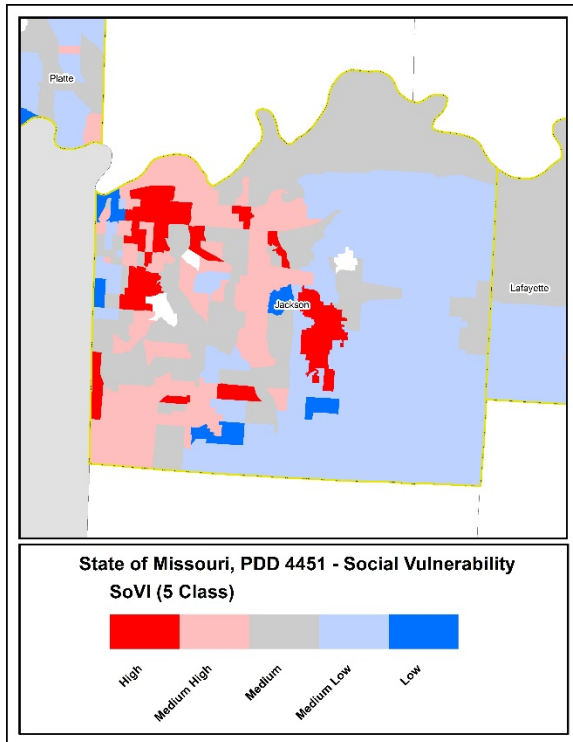
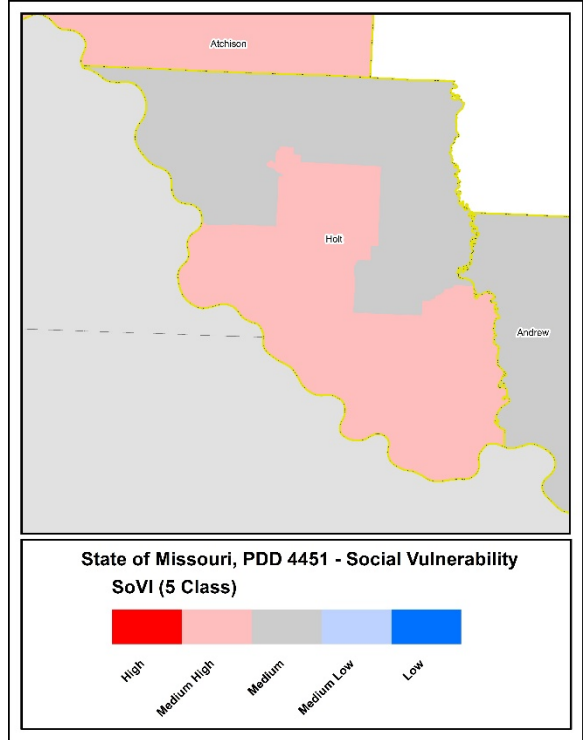
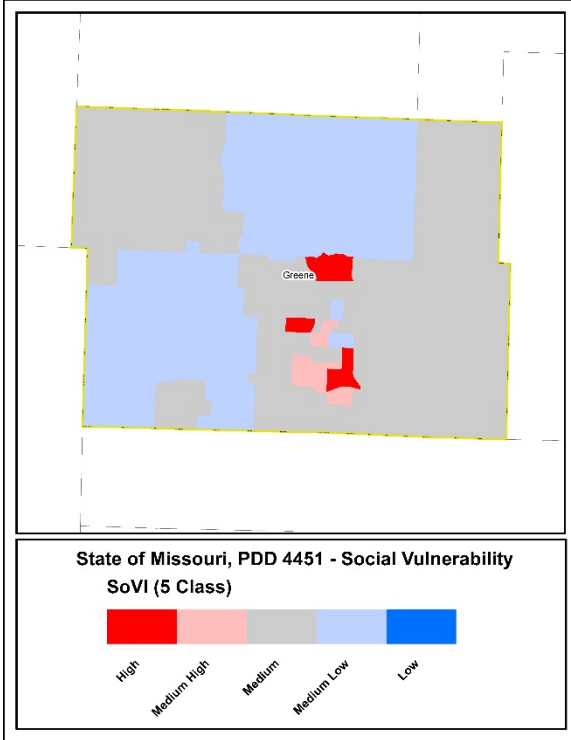


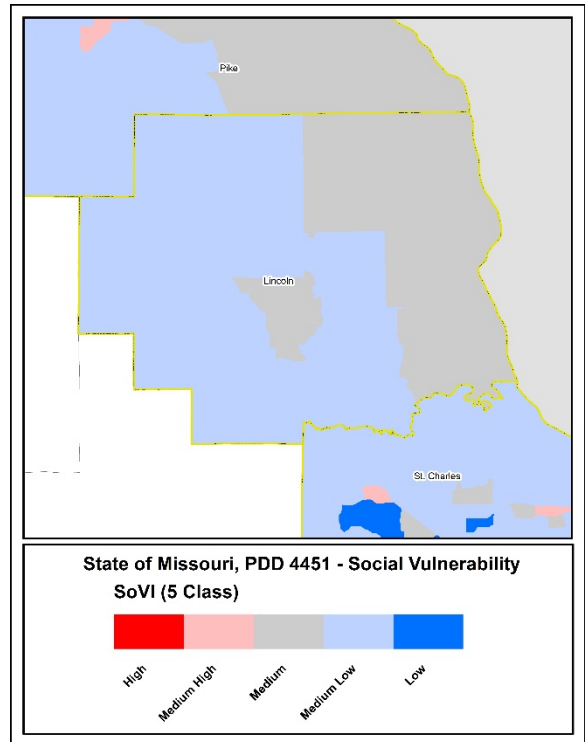
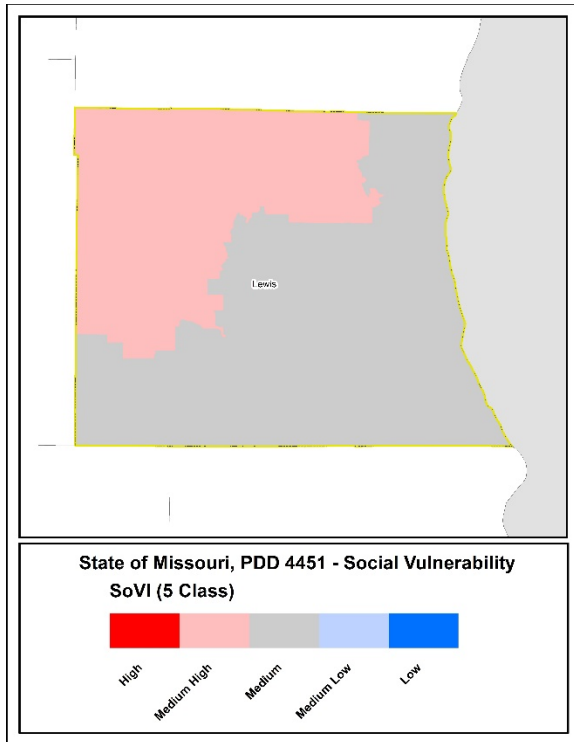
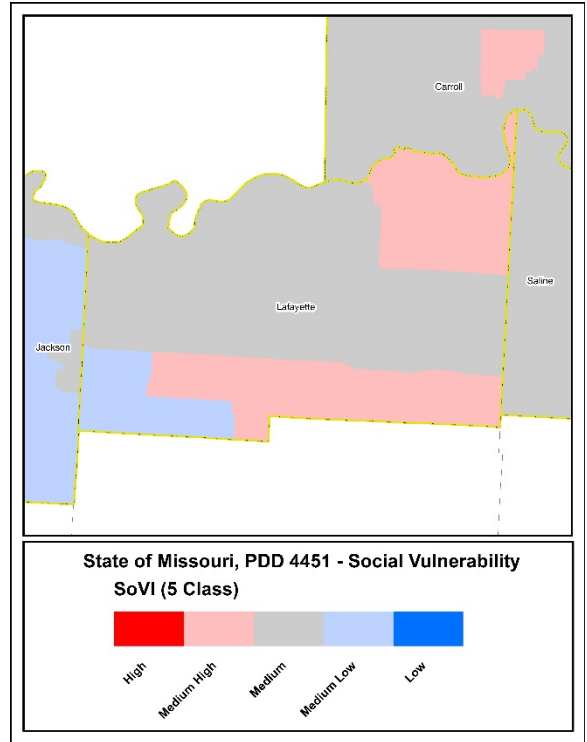
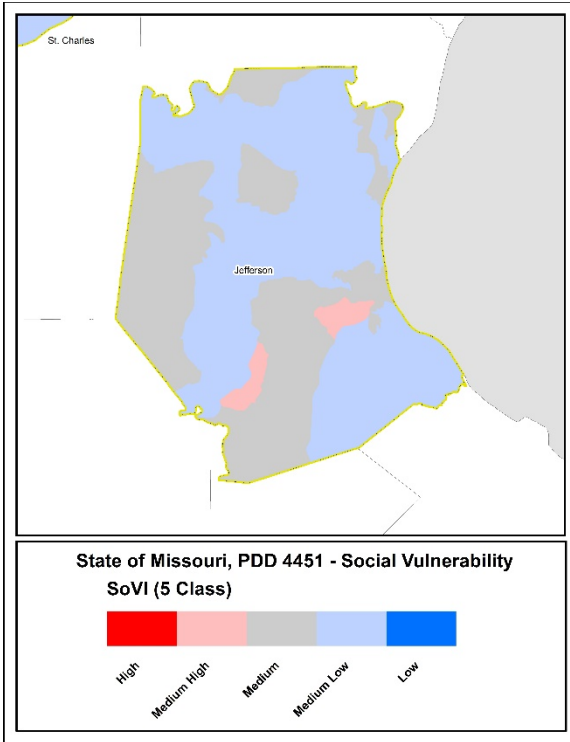


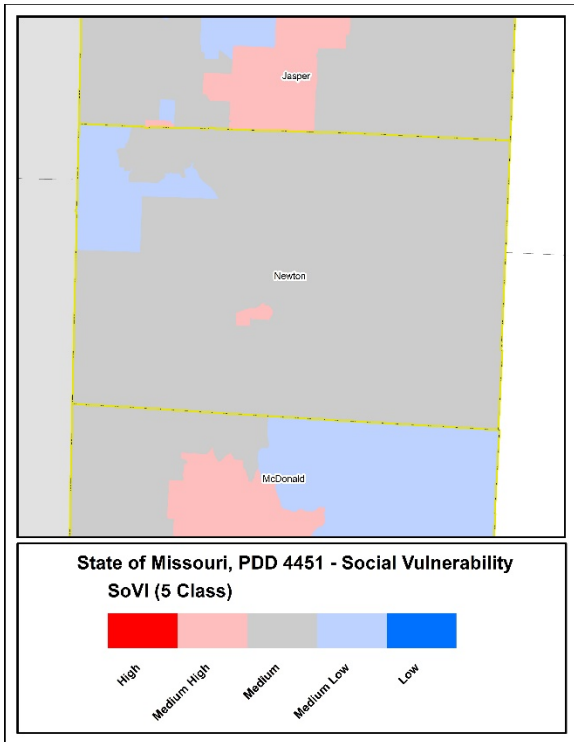
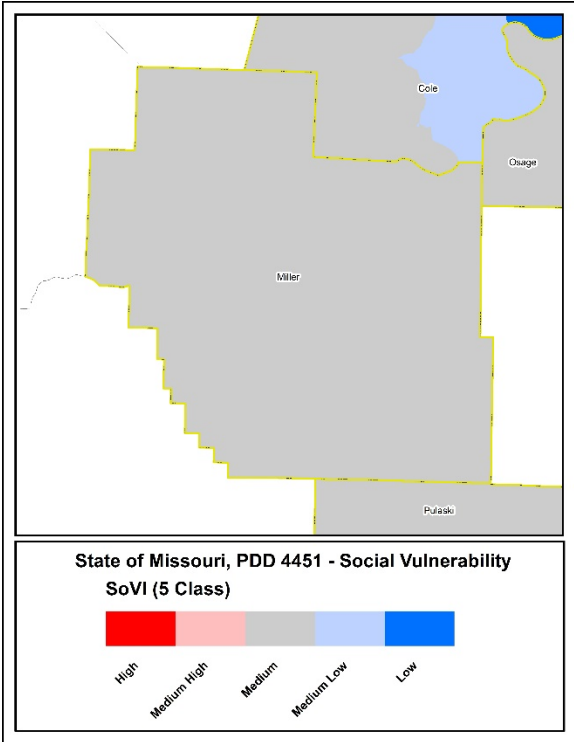
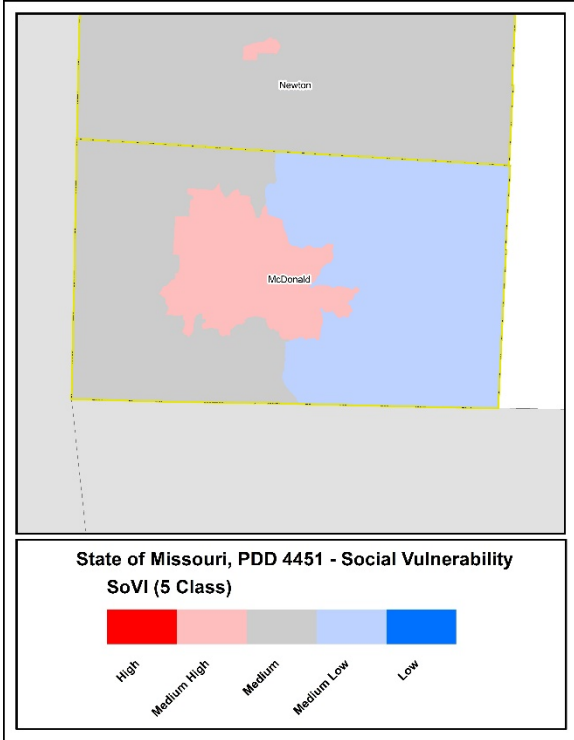
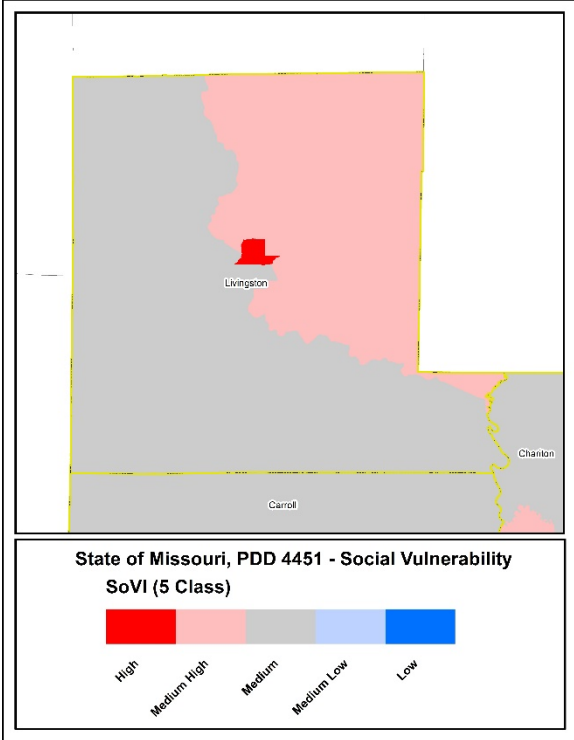
APPENDIX I: DR-4451 COUNTY SOCIAL VULNERABILITY



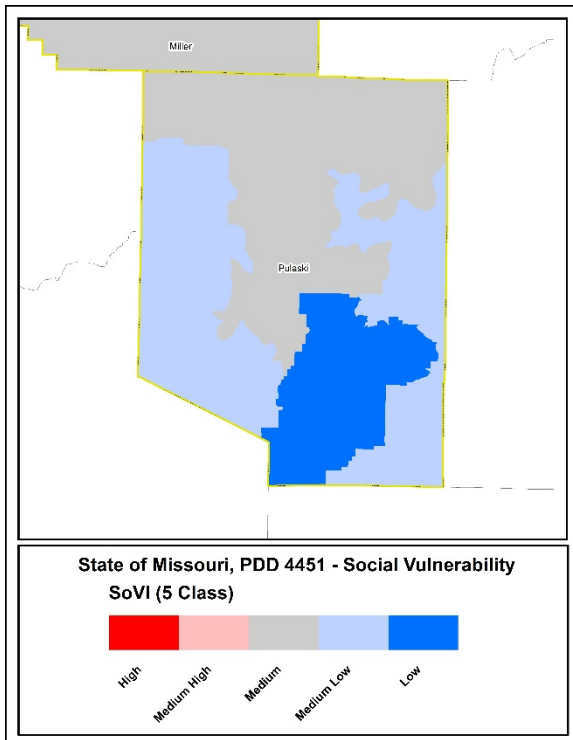
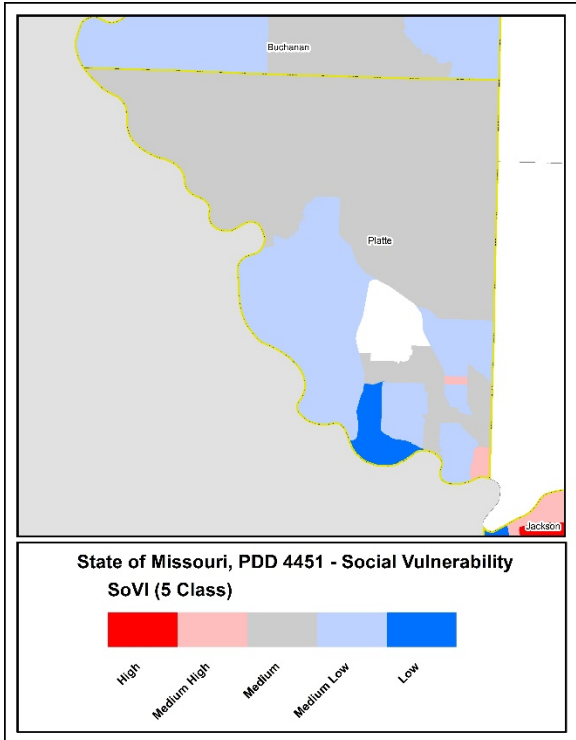
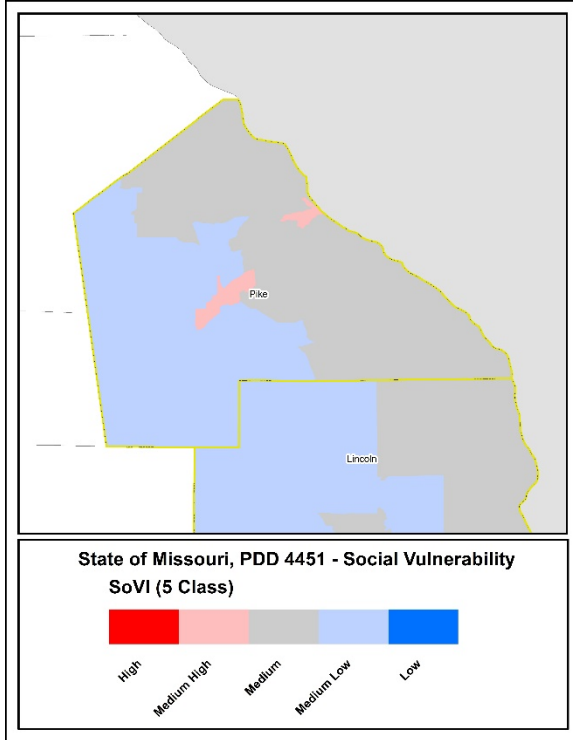
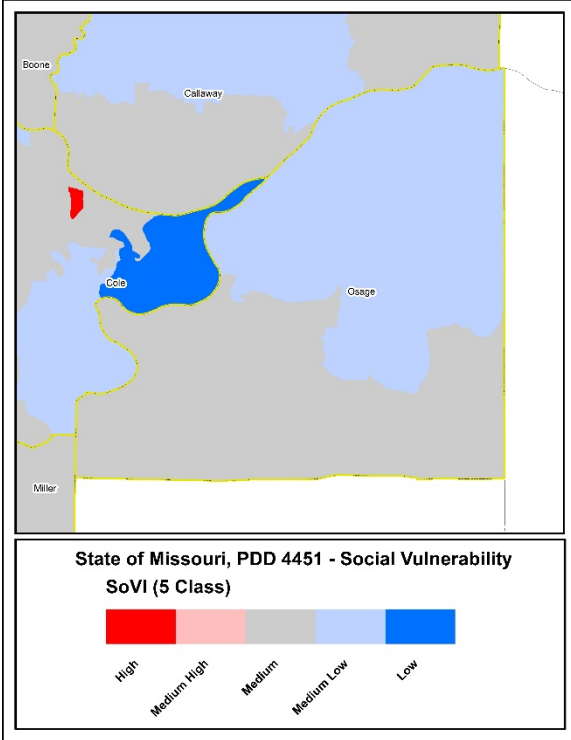


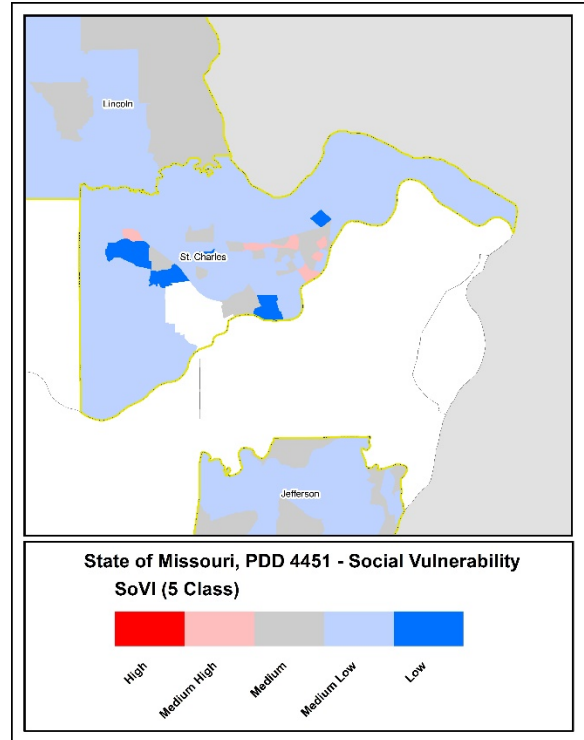
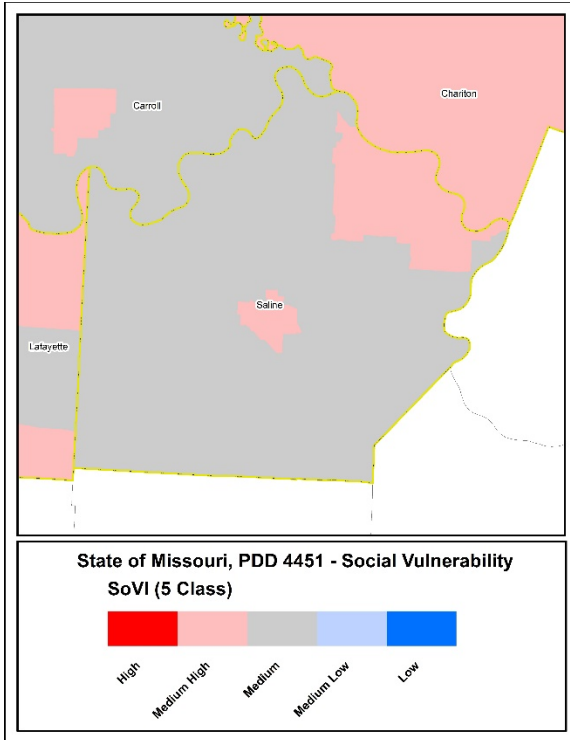




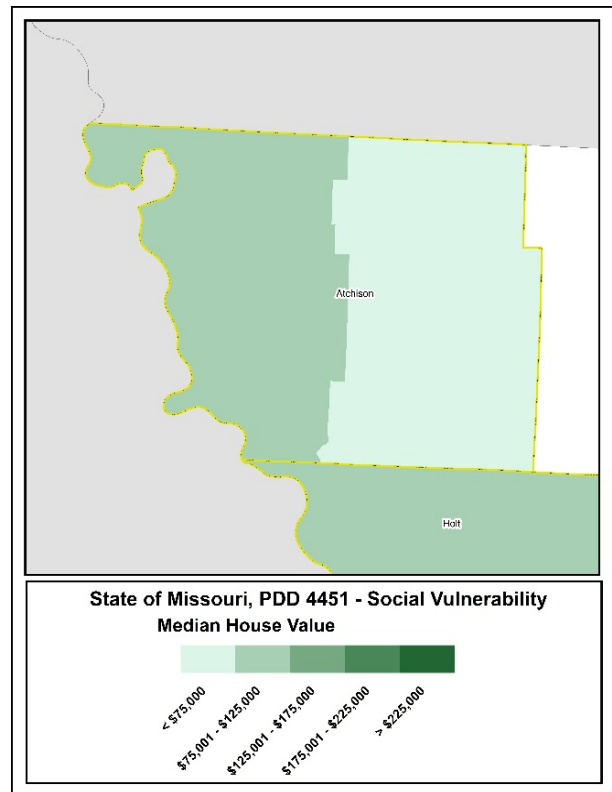
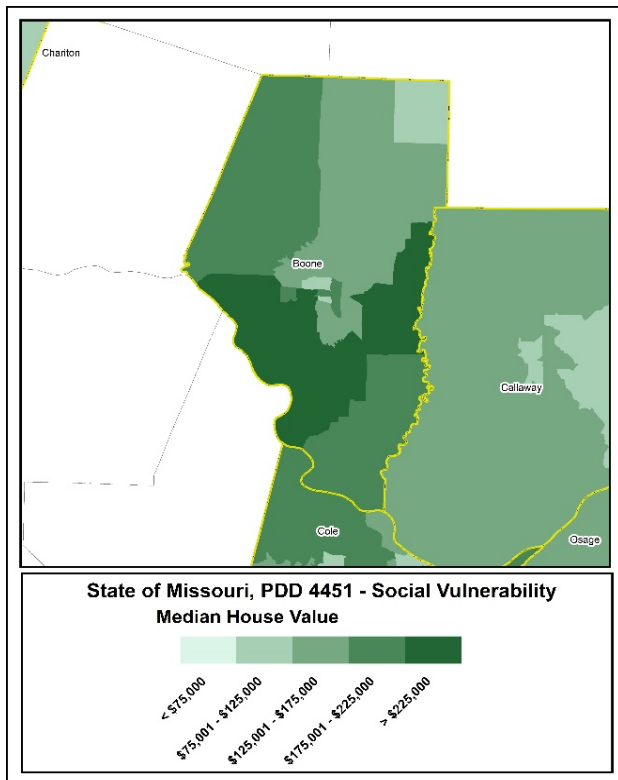
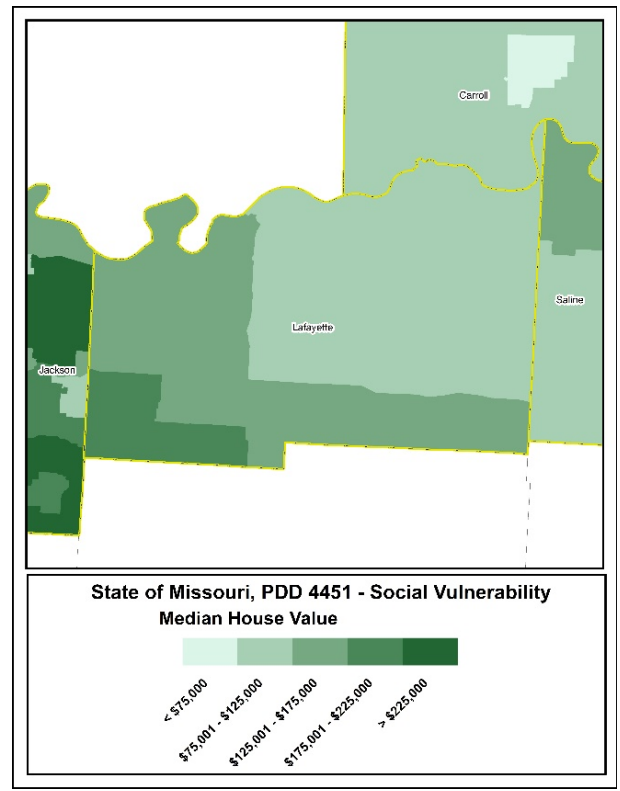
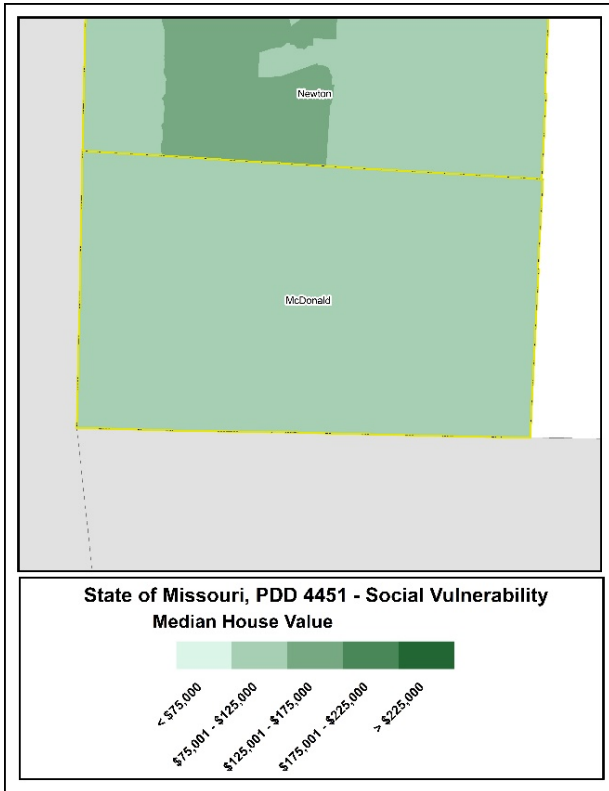


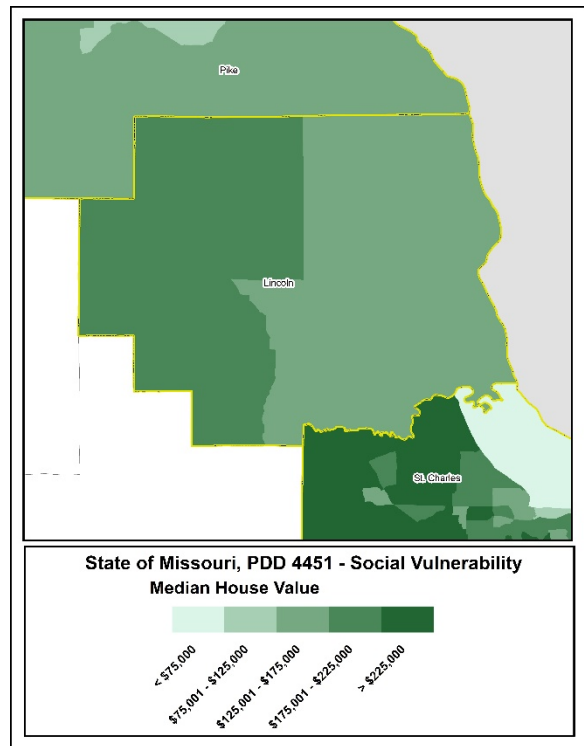
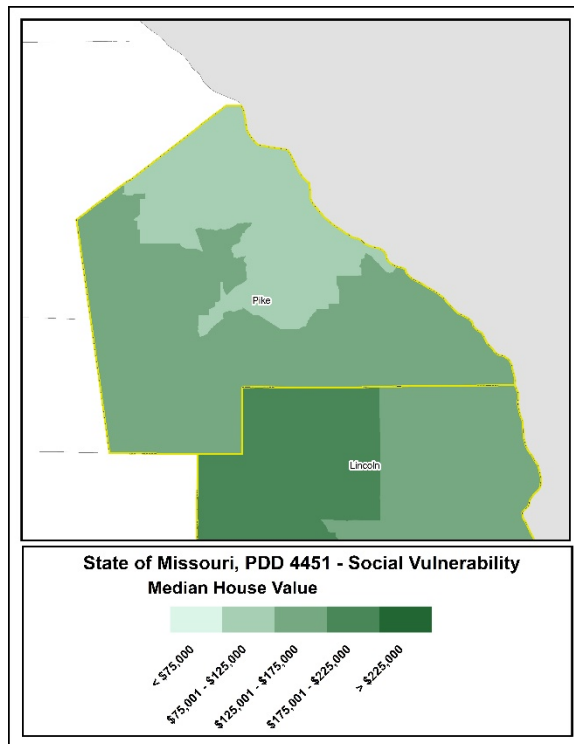
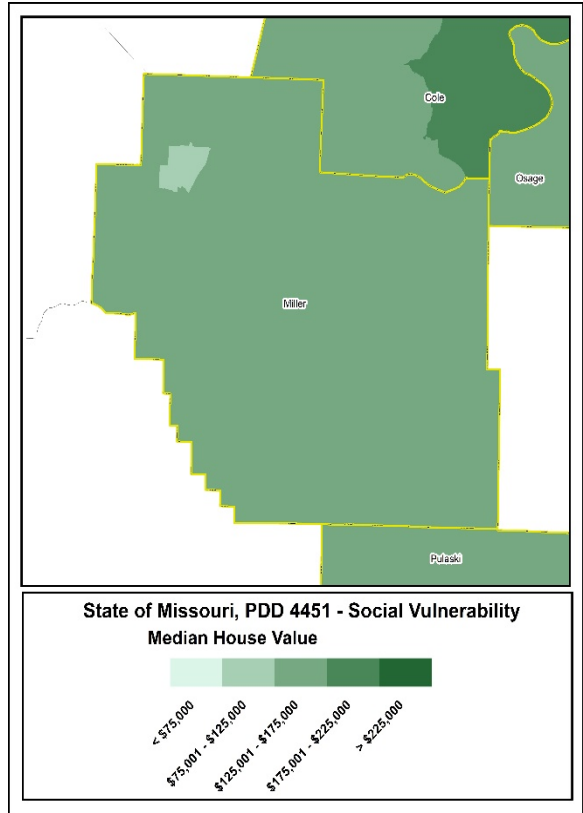
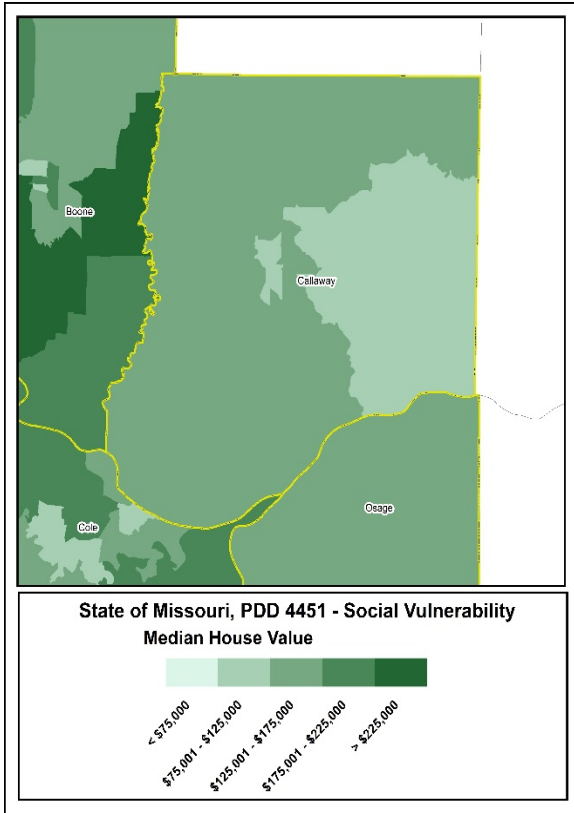


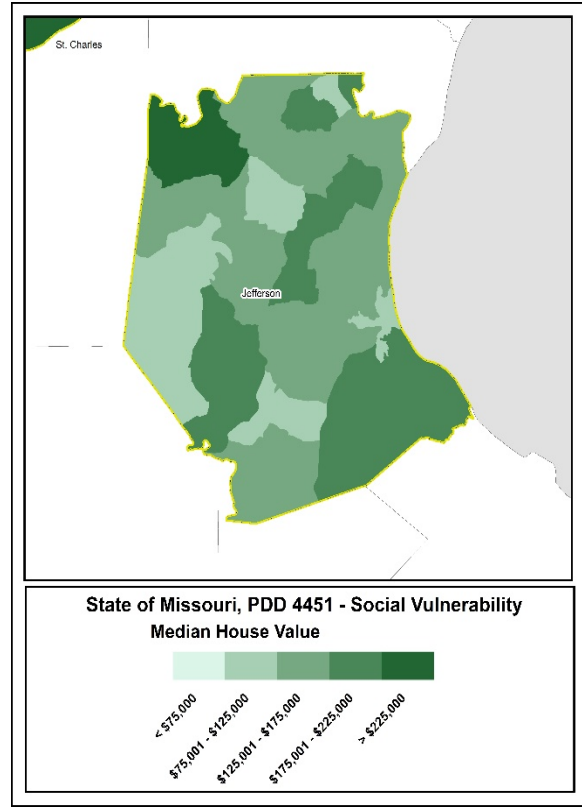
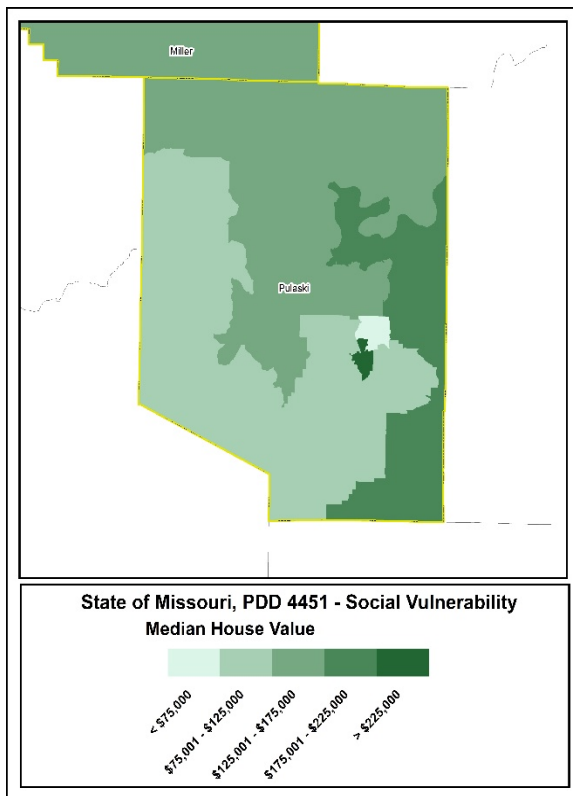
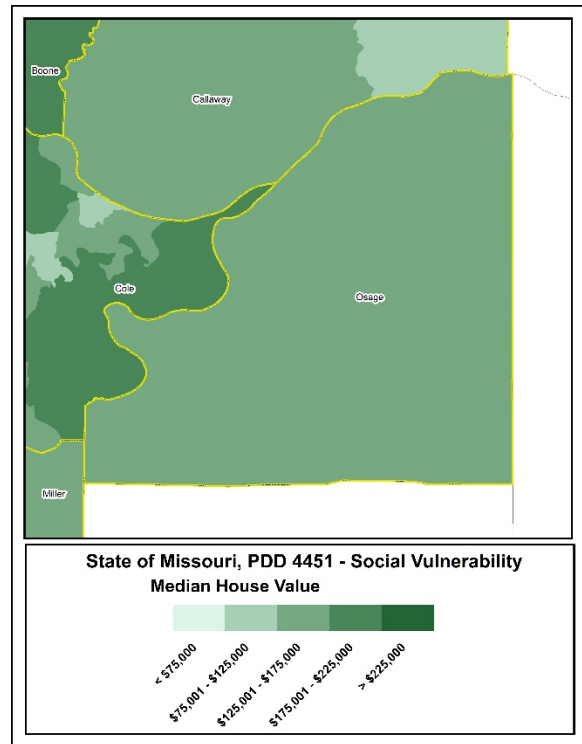
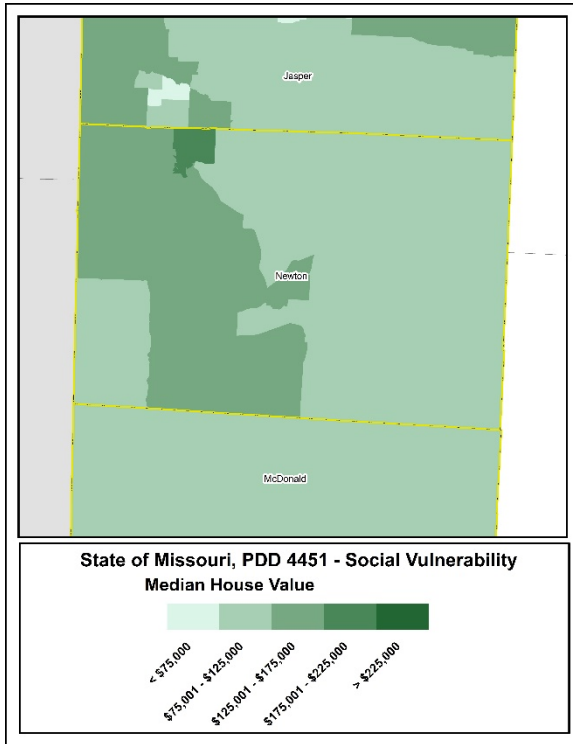


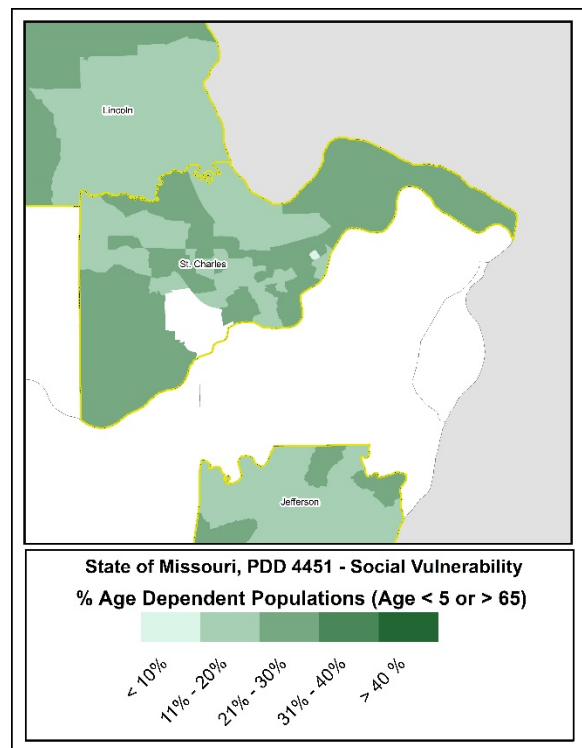
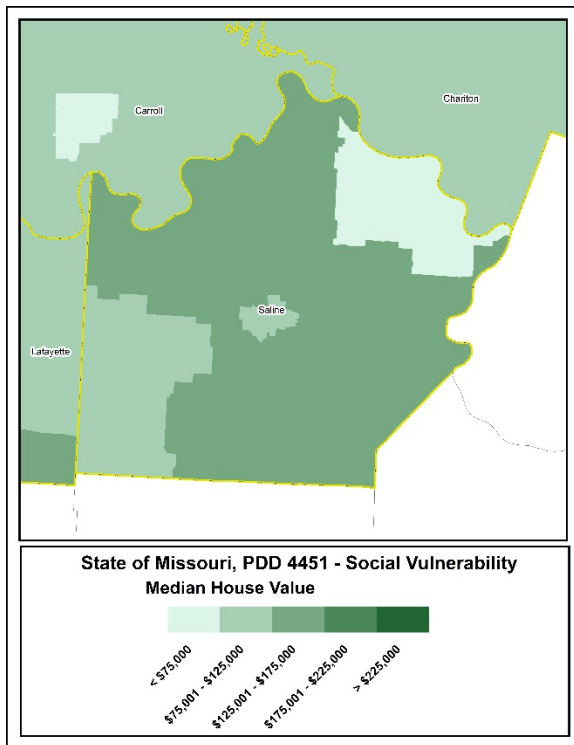
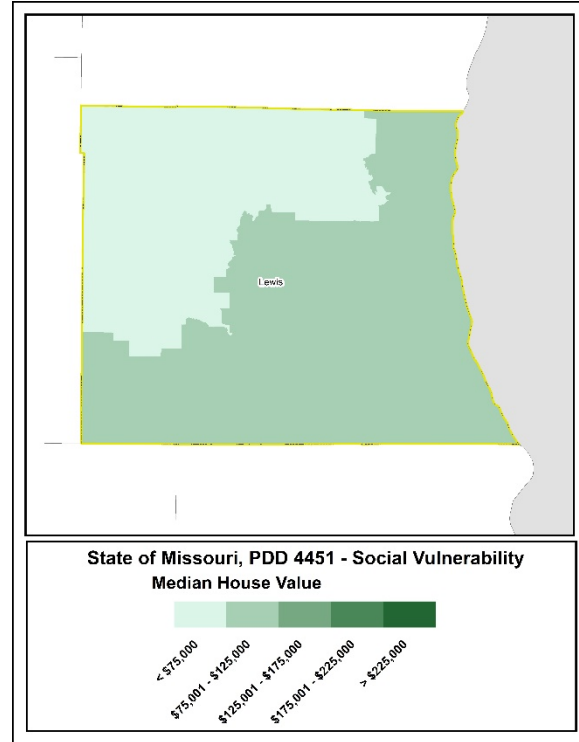
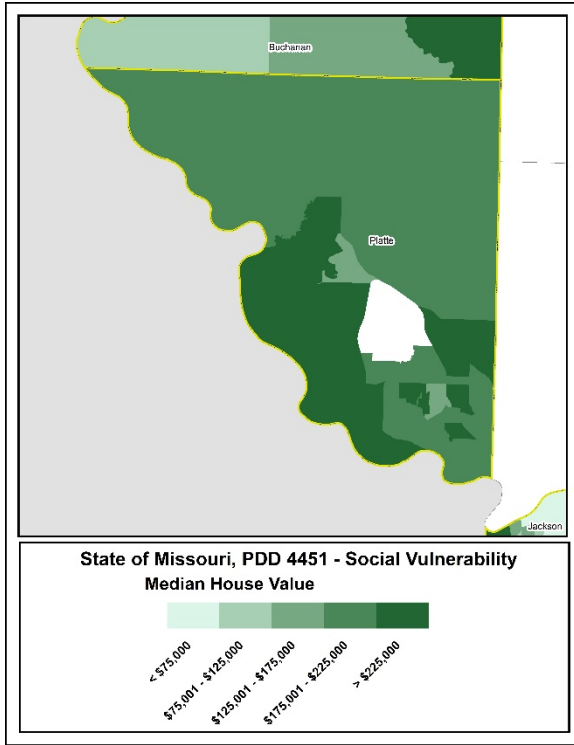


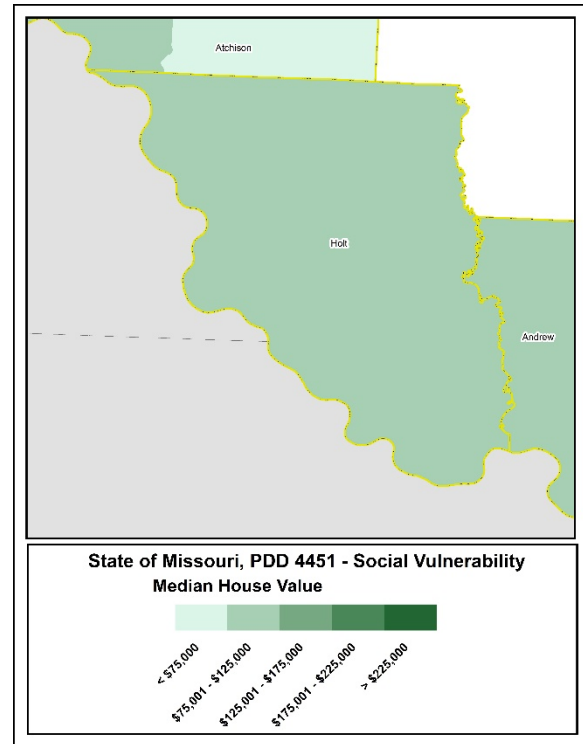
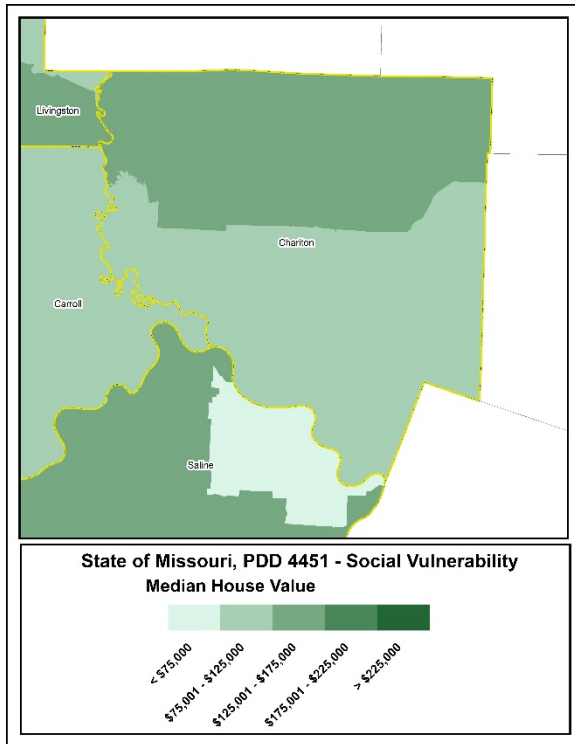
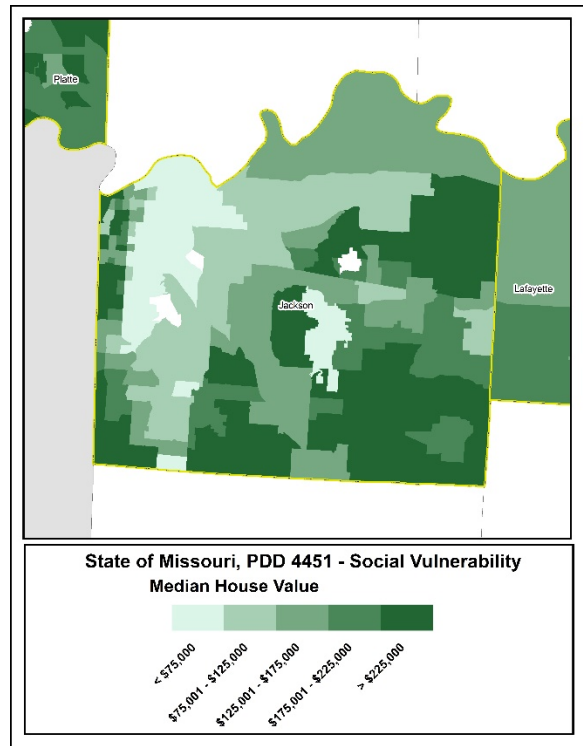
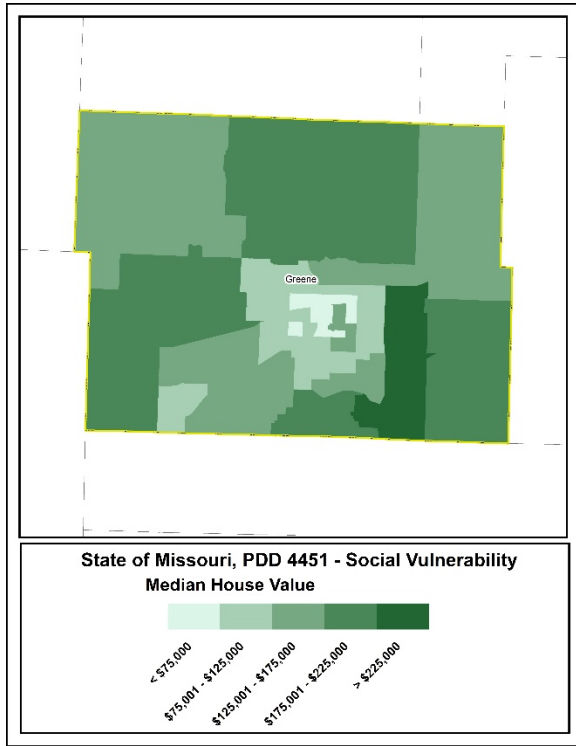
## APPENDIX J: DR-4451 COUNTY MEDIAN HOUSE VALUE



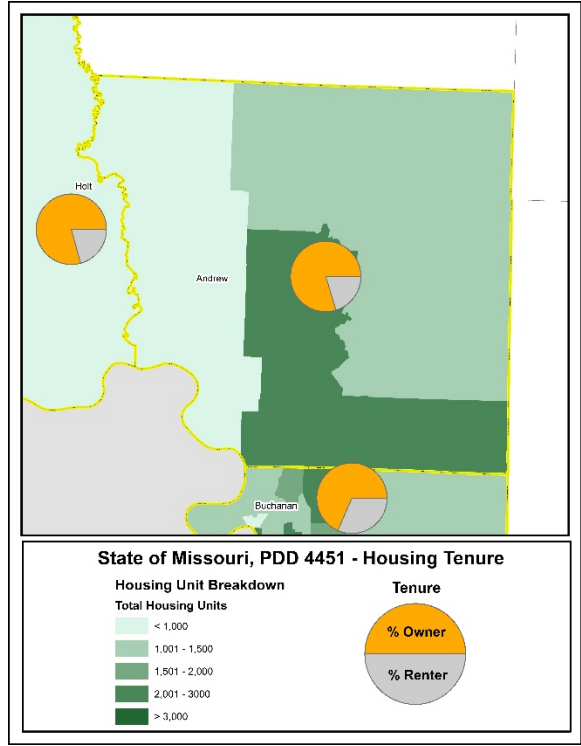
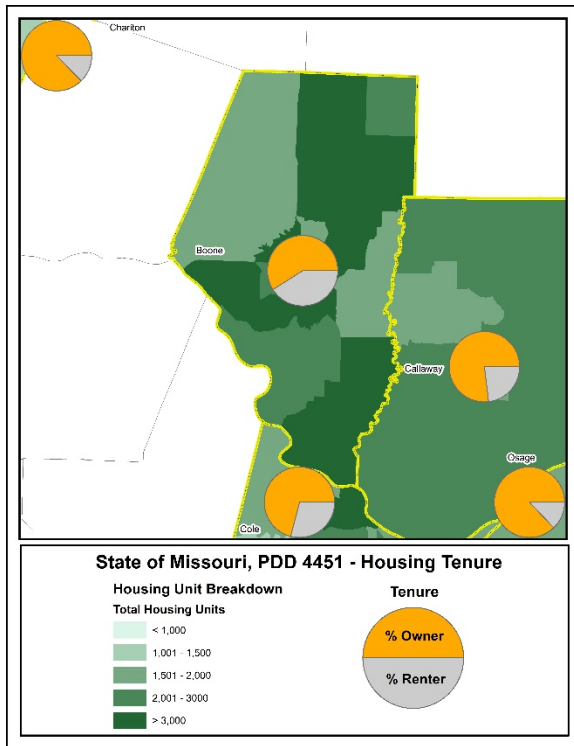
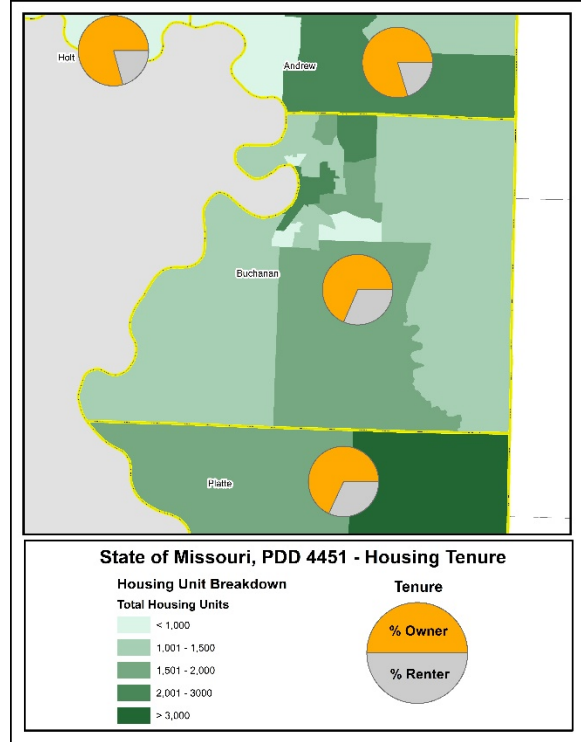
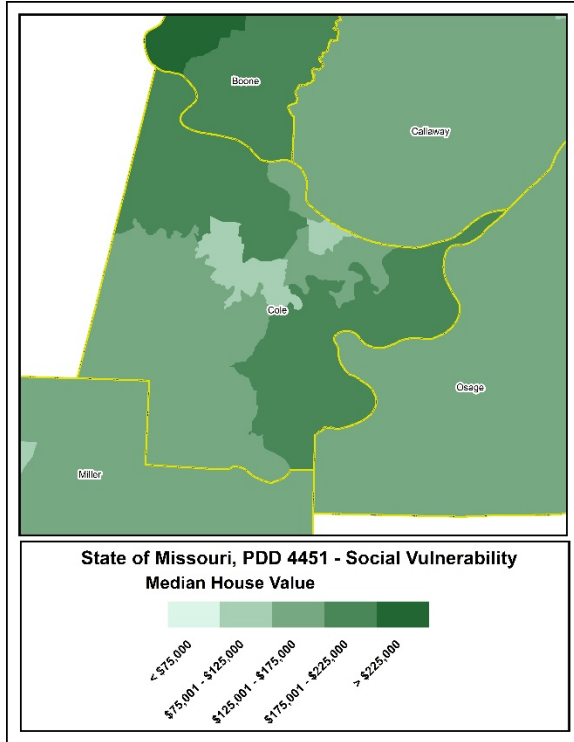




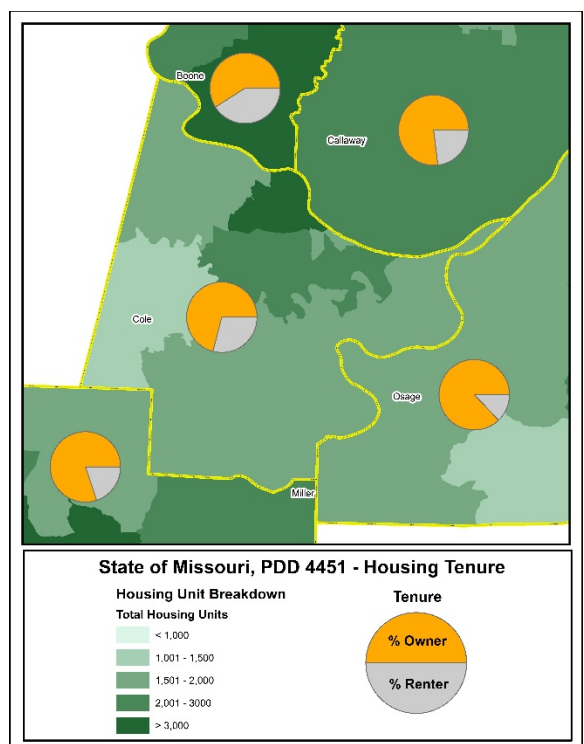
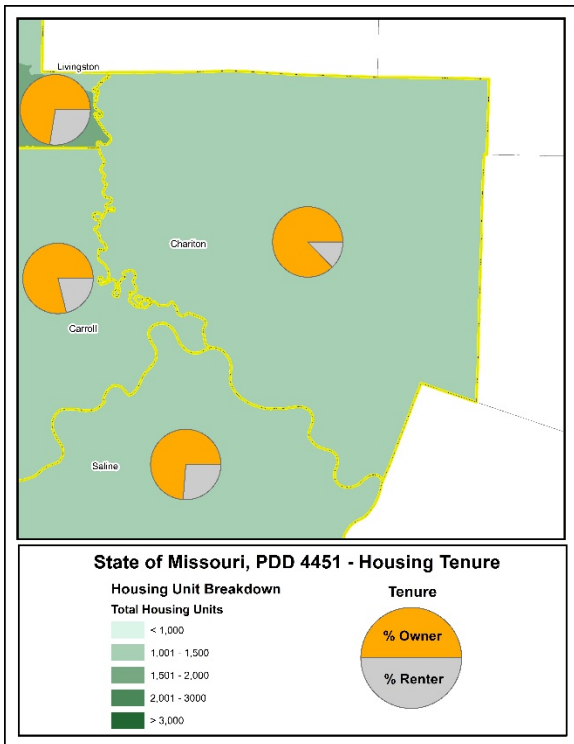
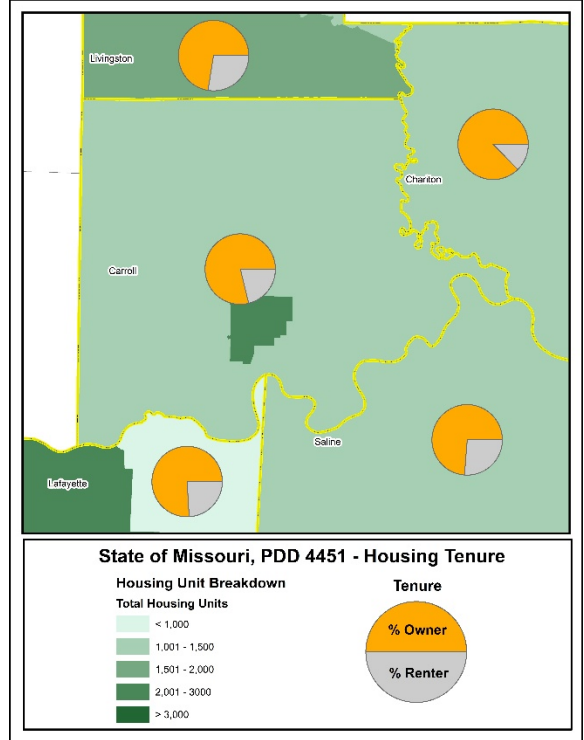
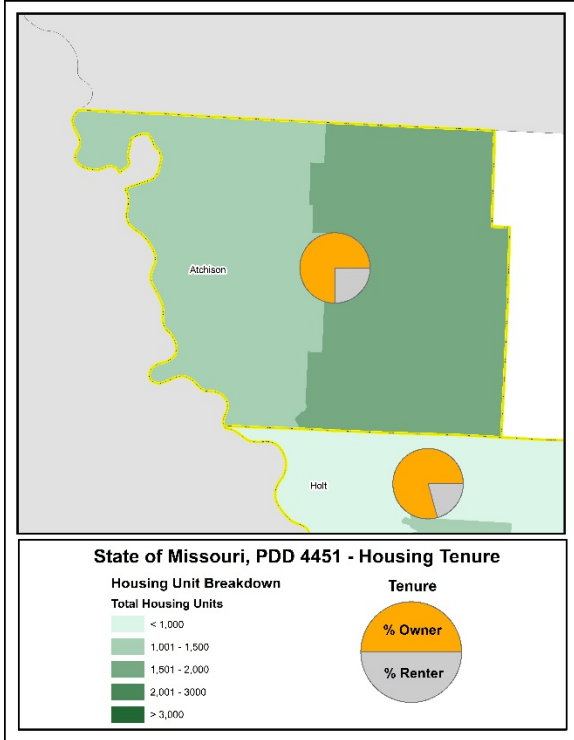


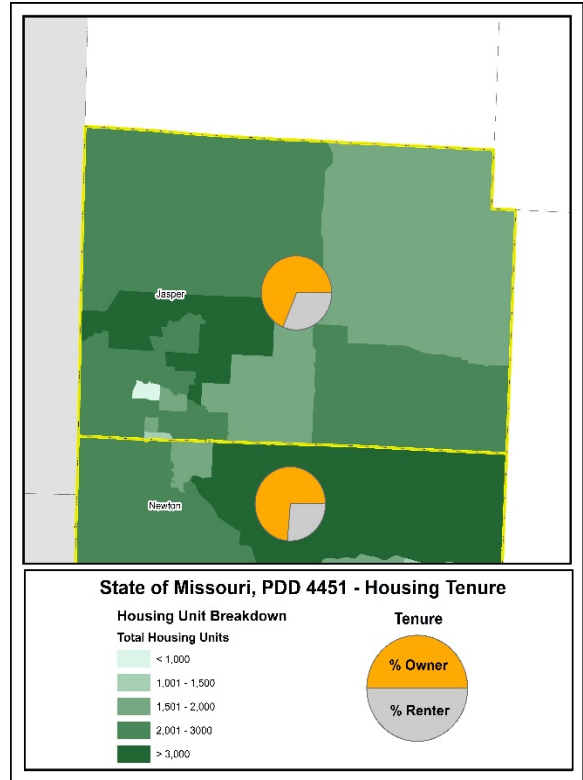
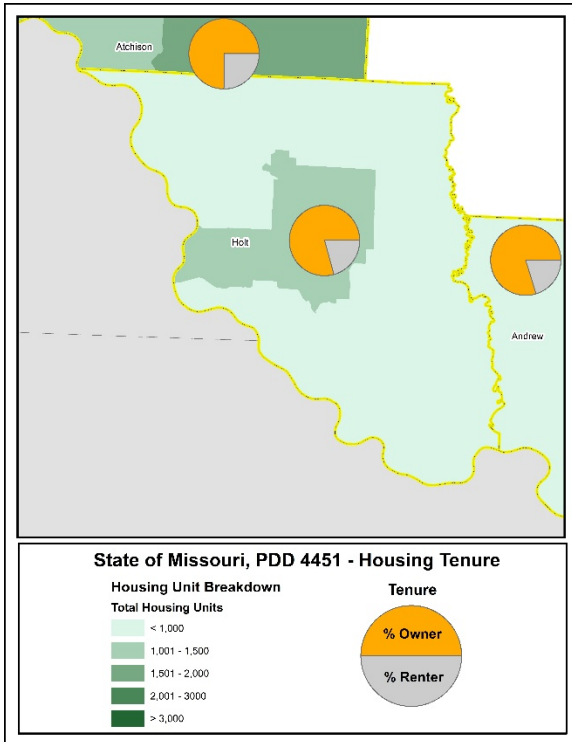
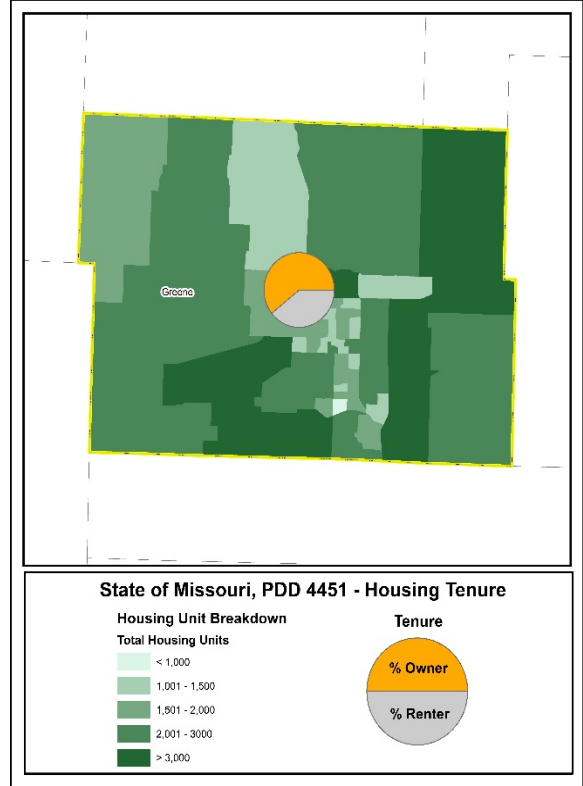
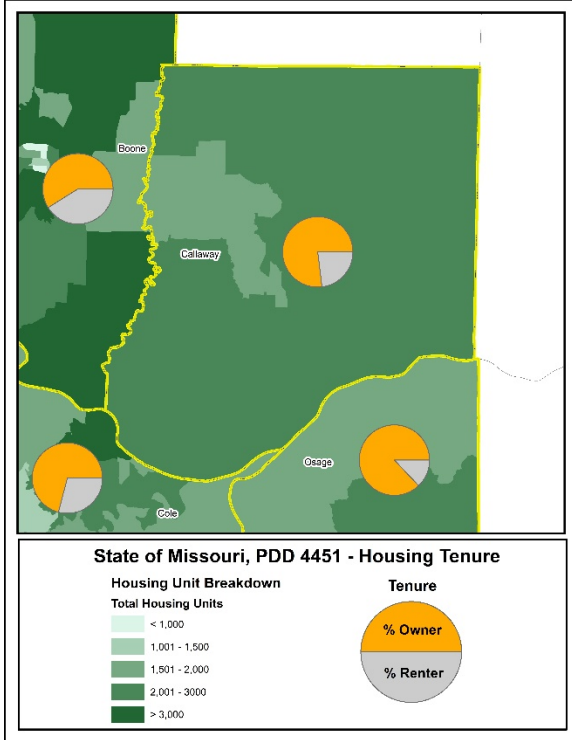


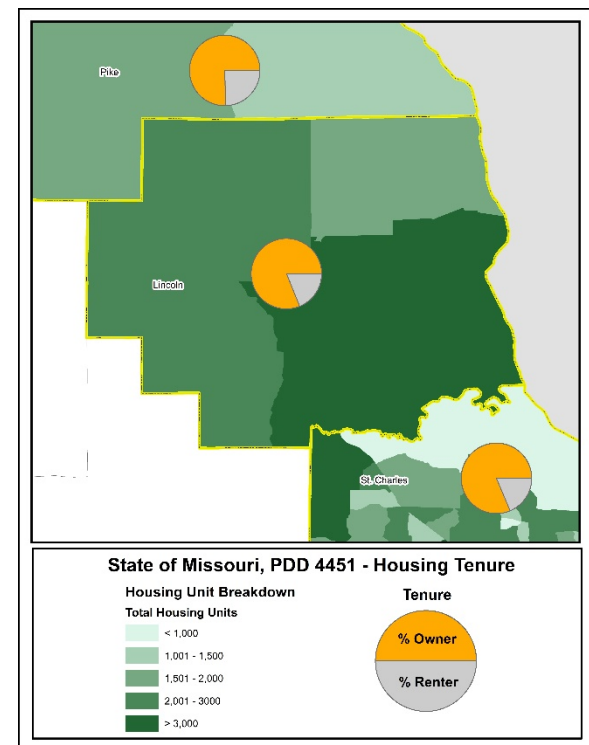
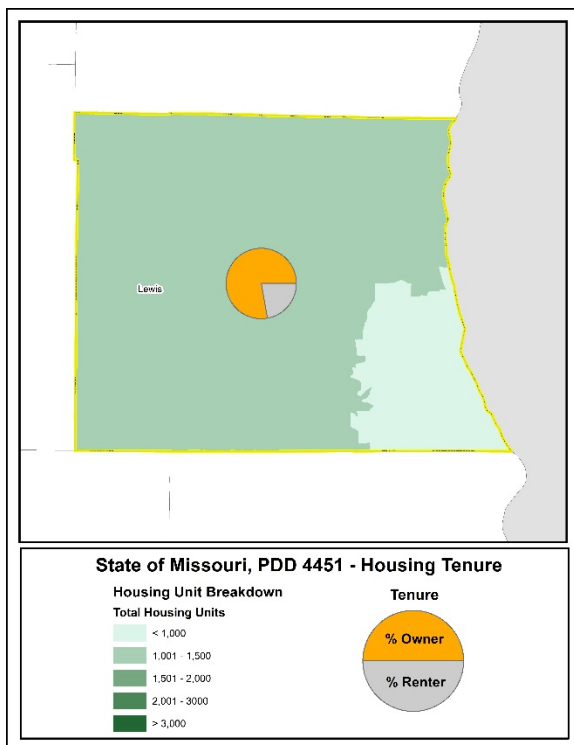
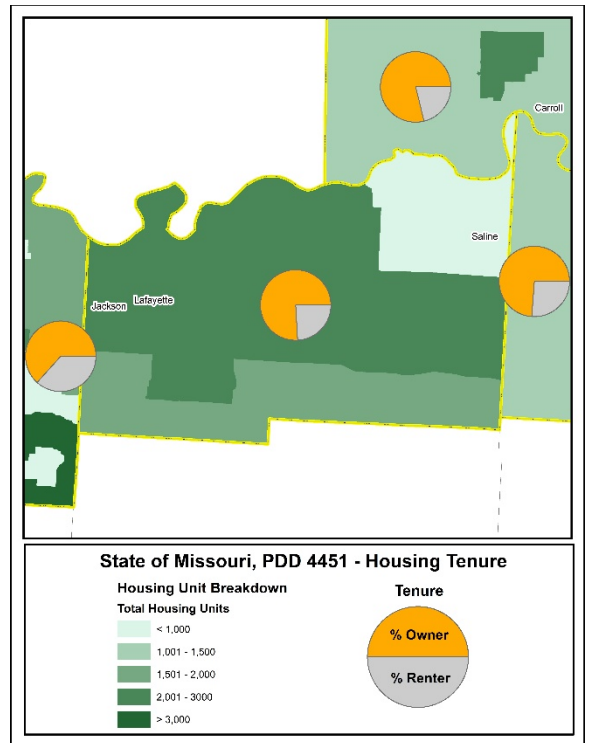
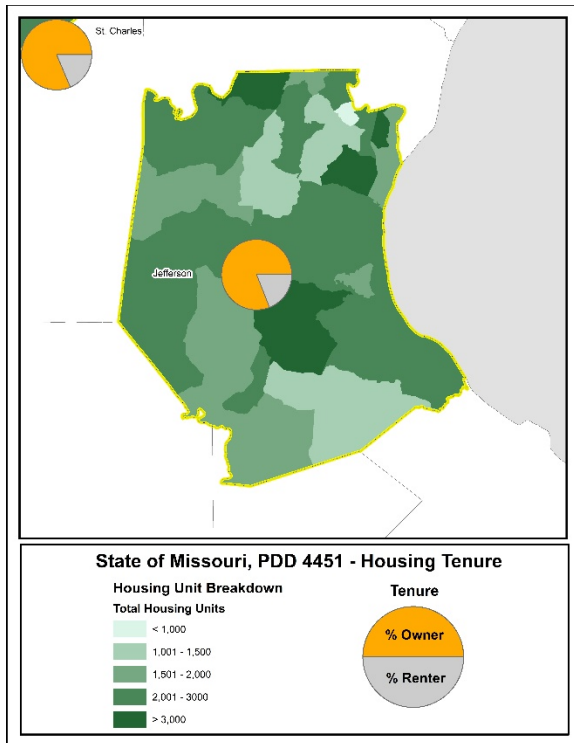
## APPENDIX K: DR-4451 COUNTY HOUSING TENURE

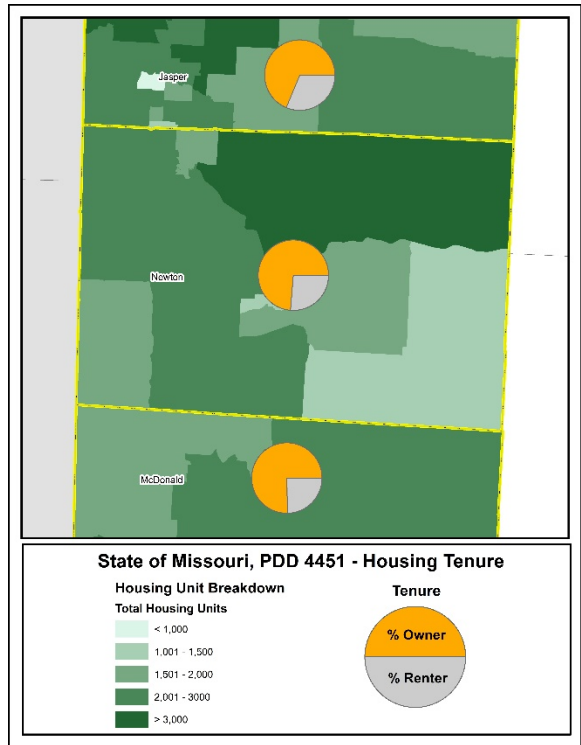
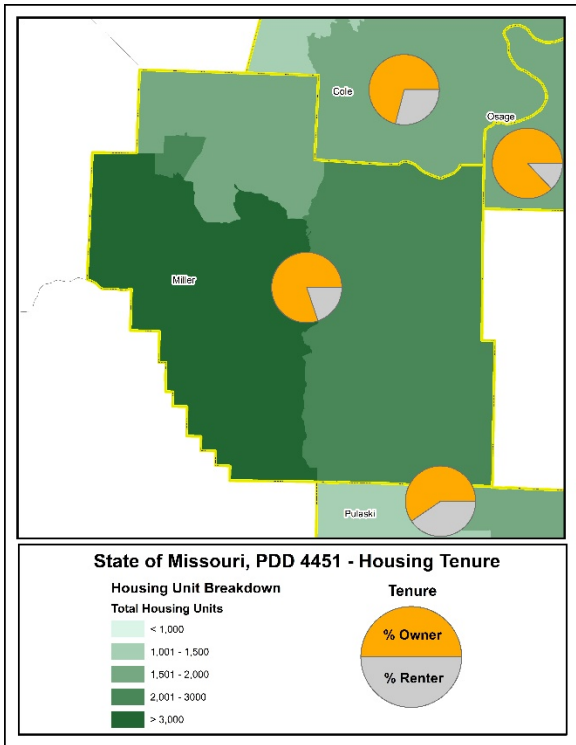
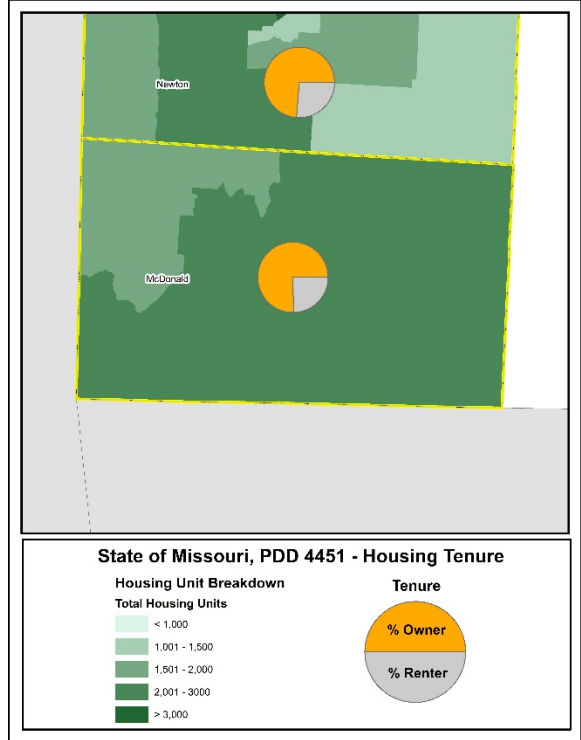
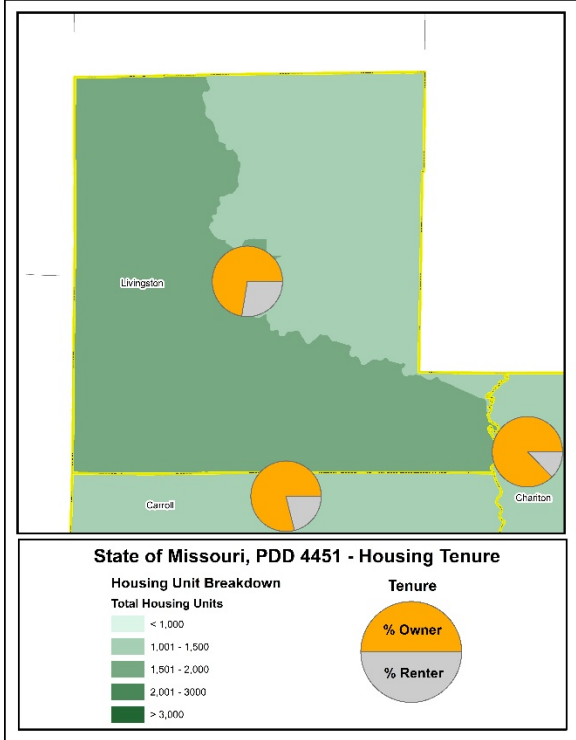


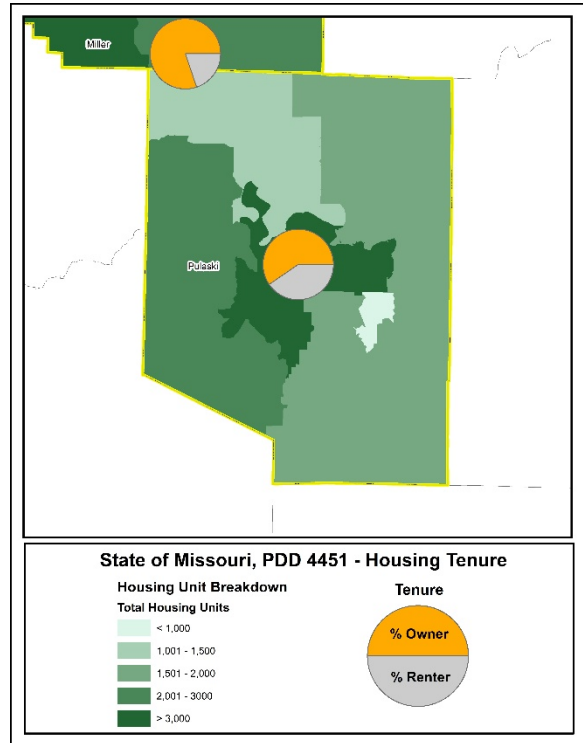
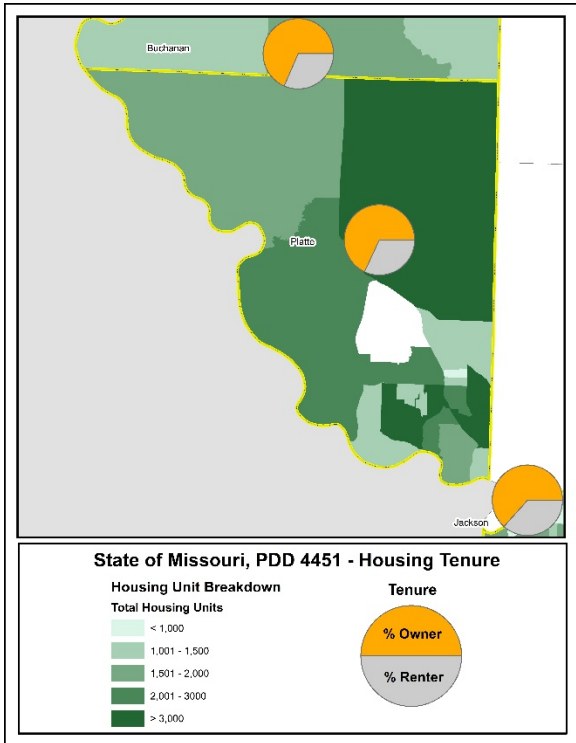
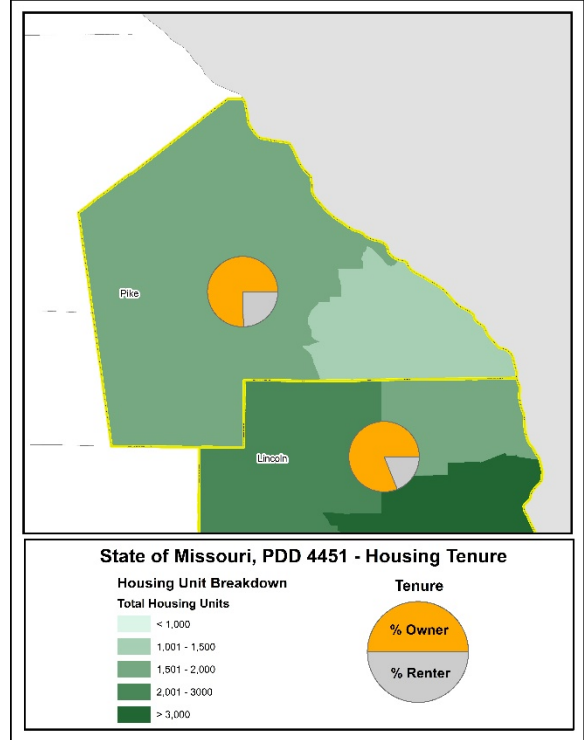
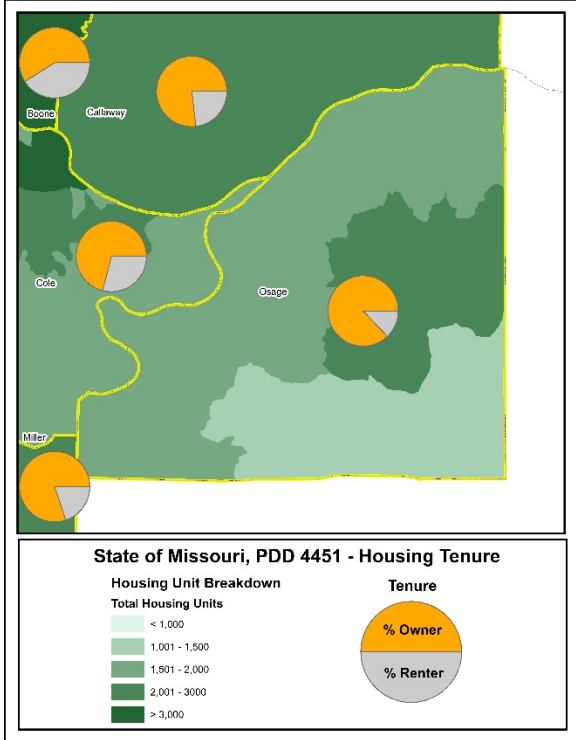


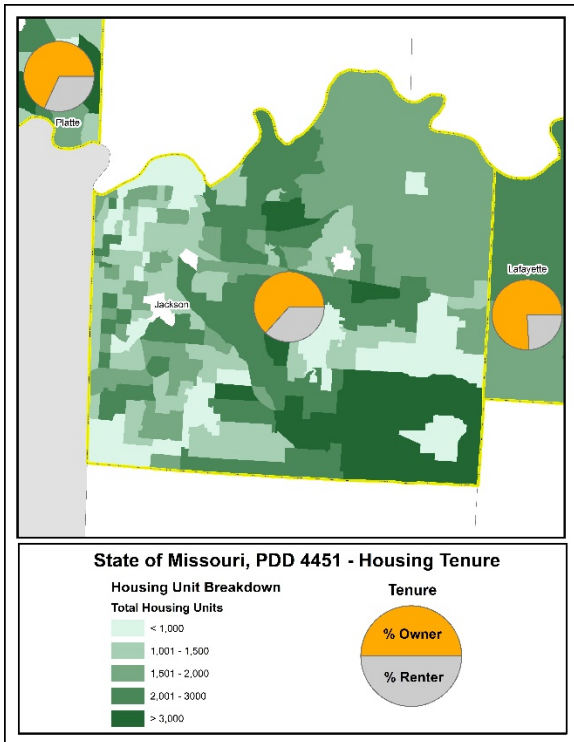
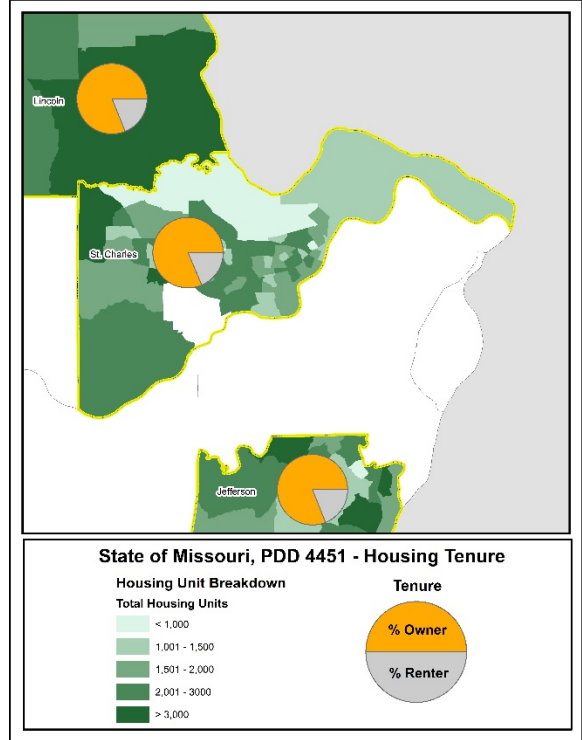
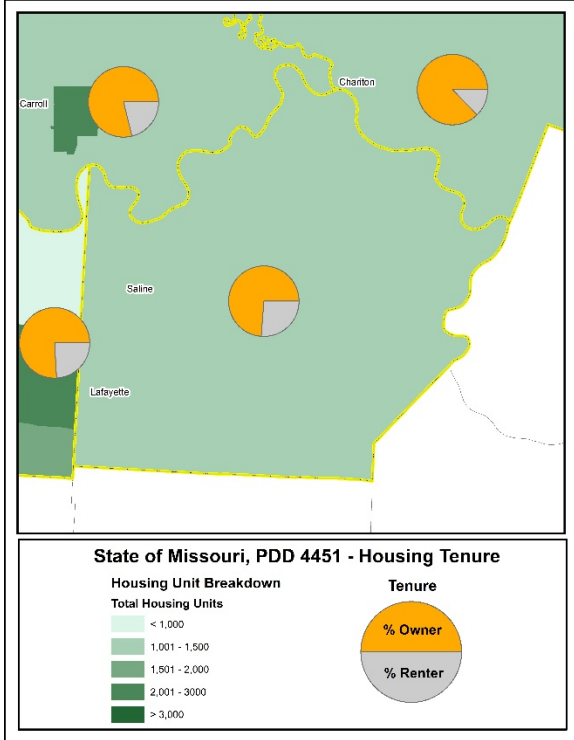






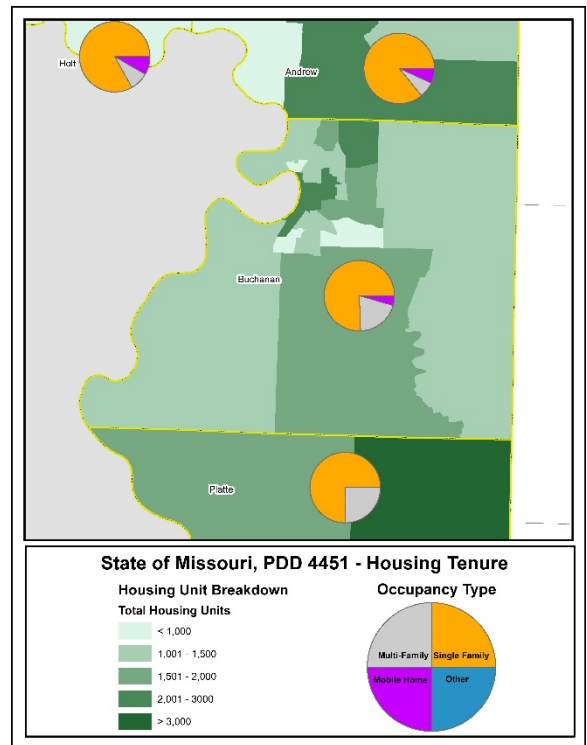
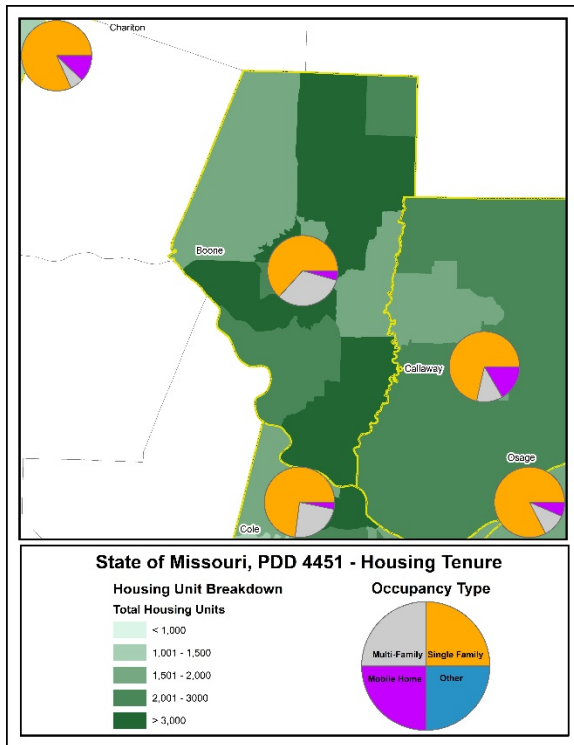
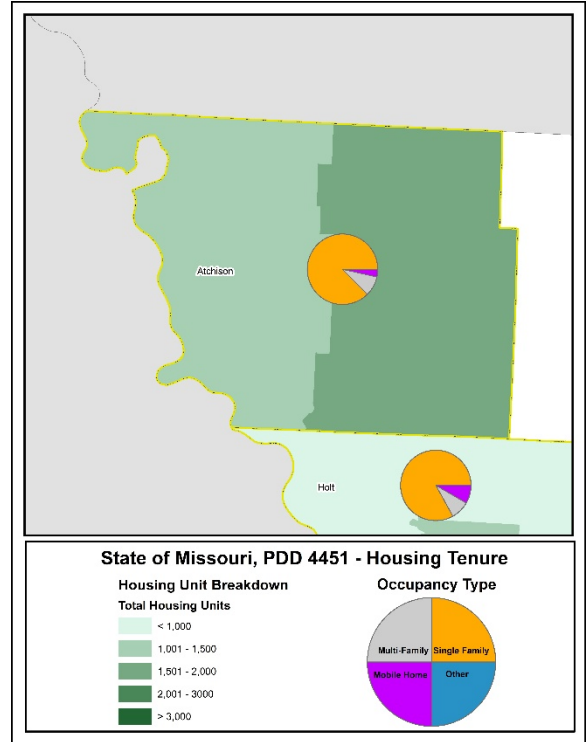
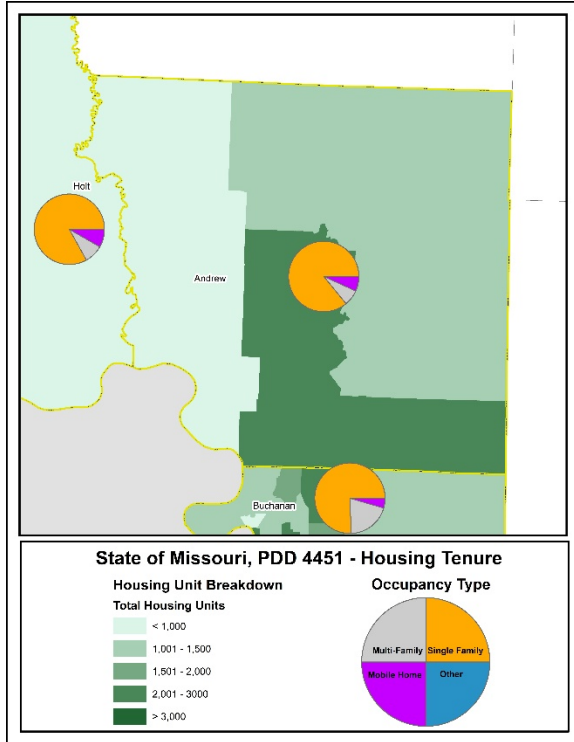


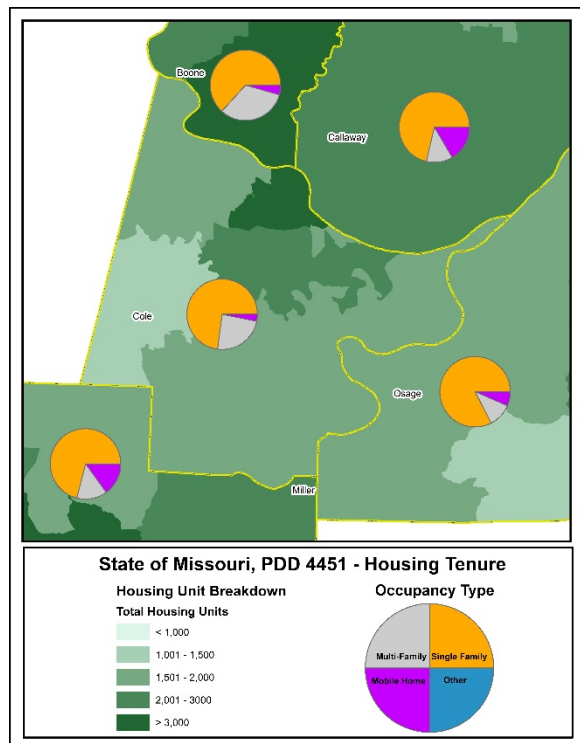
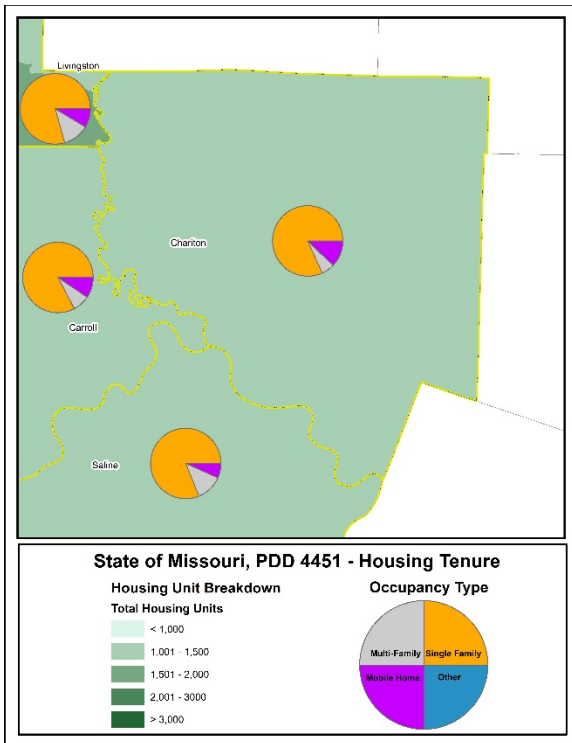
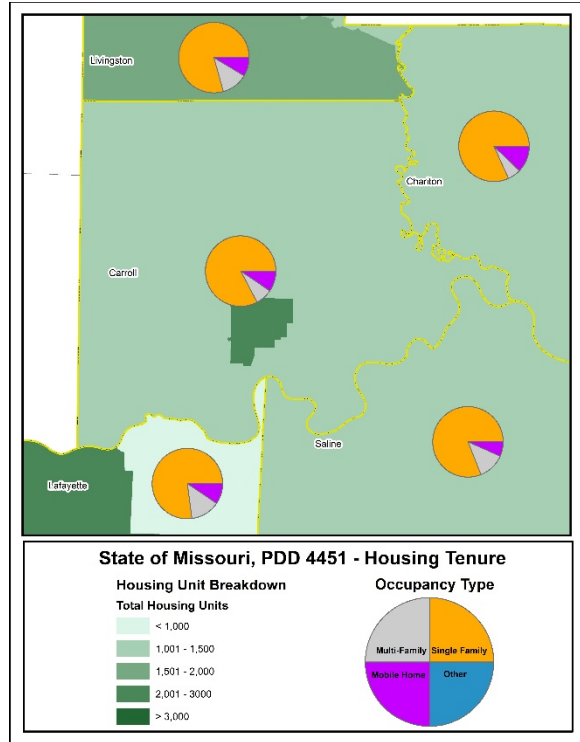
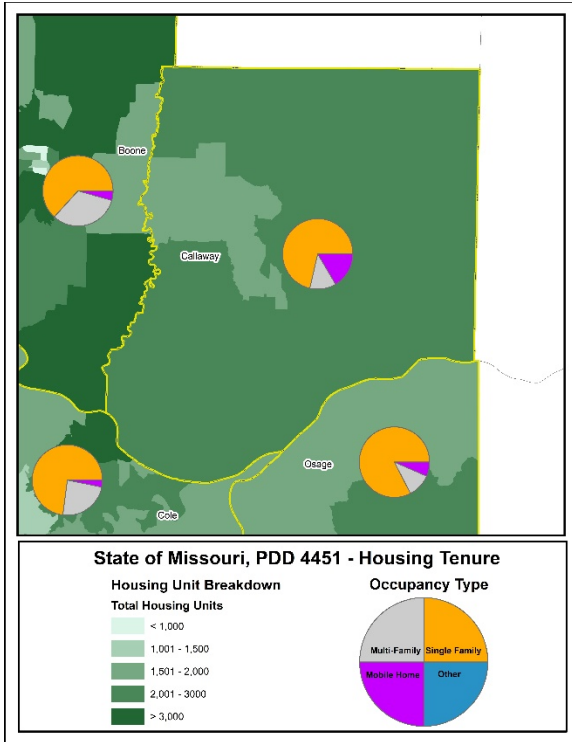




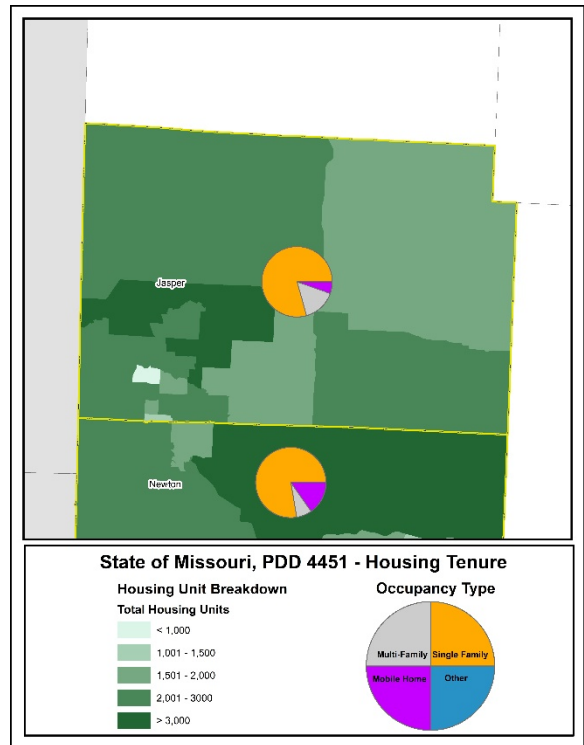
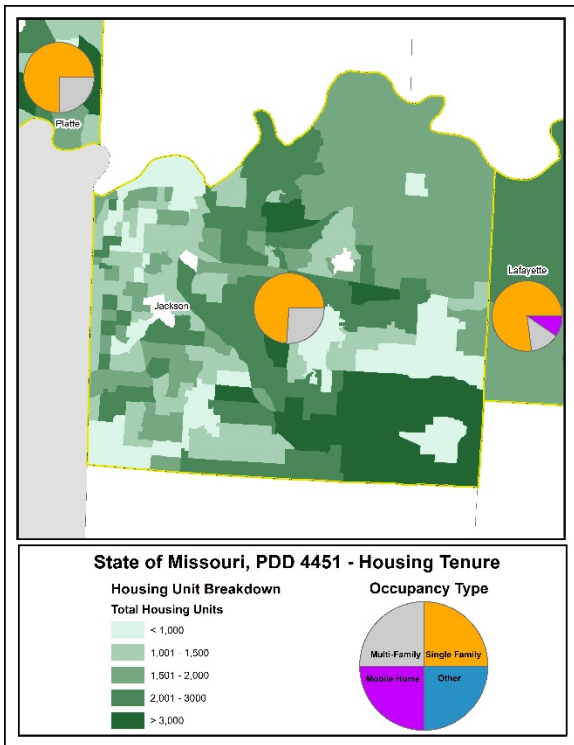
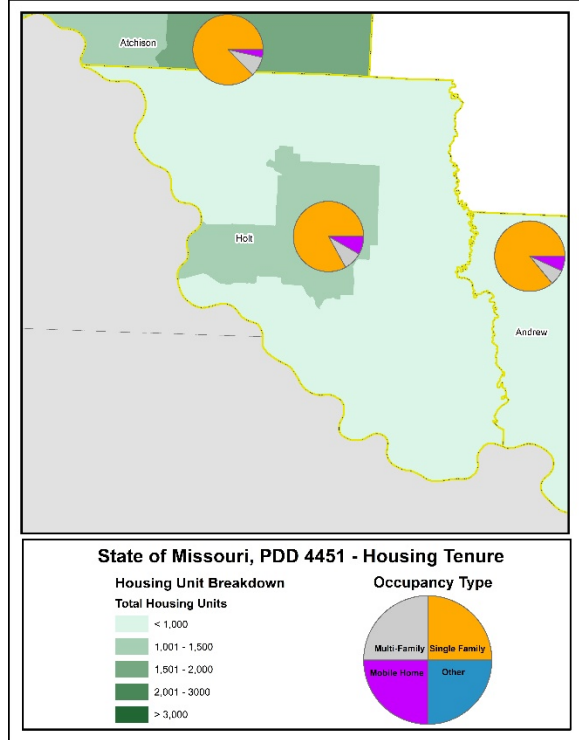
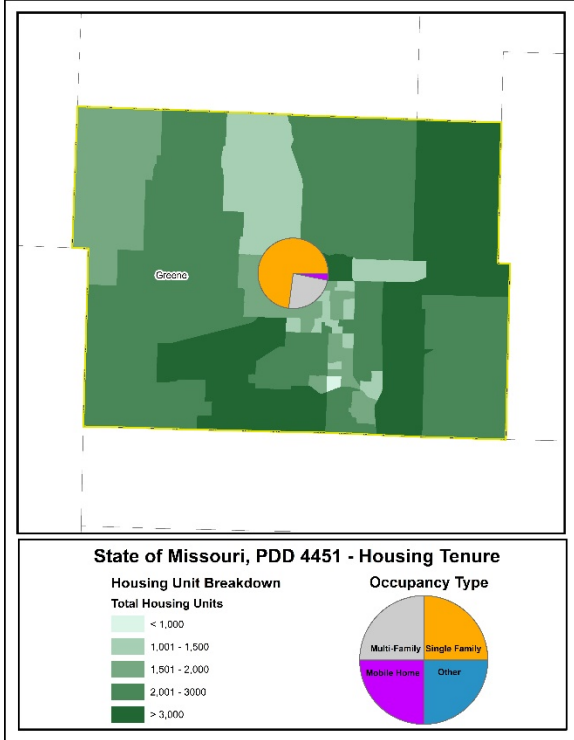


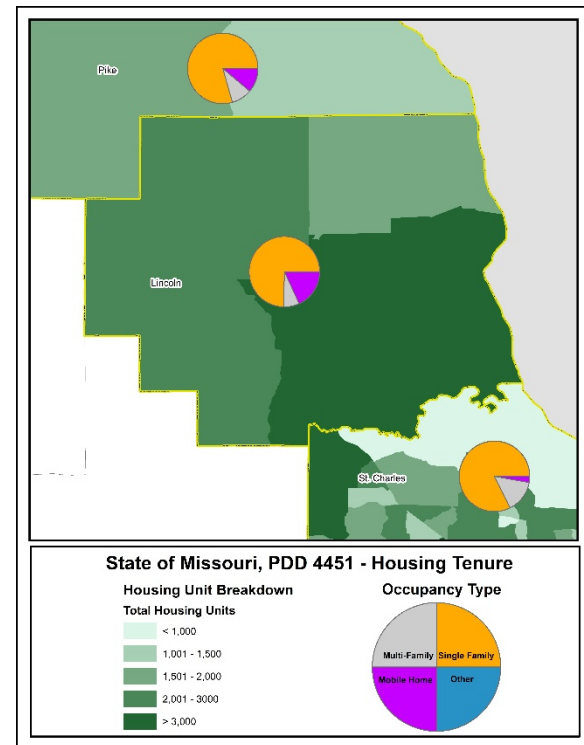
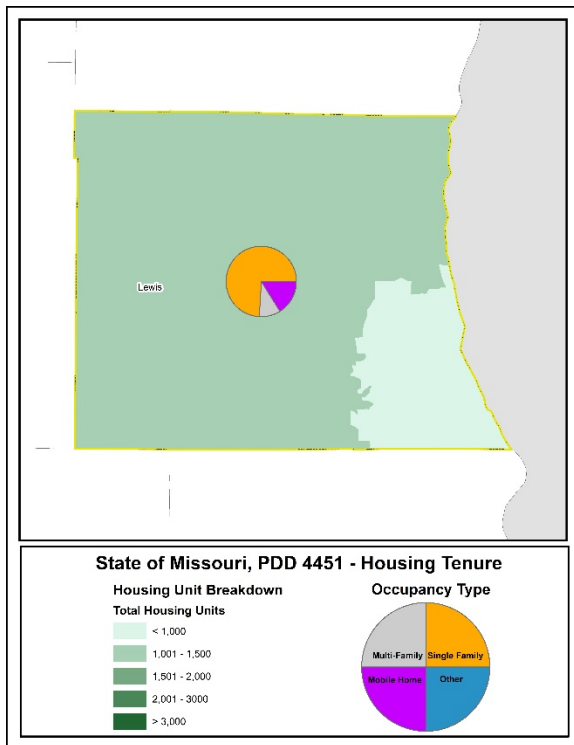
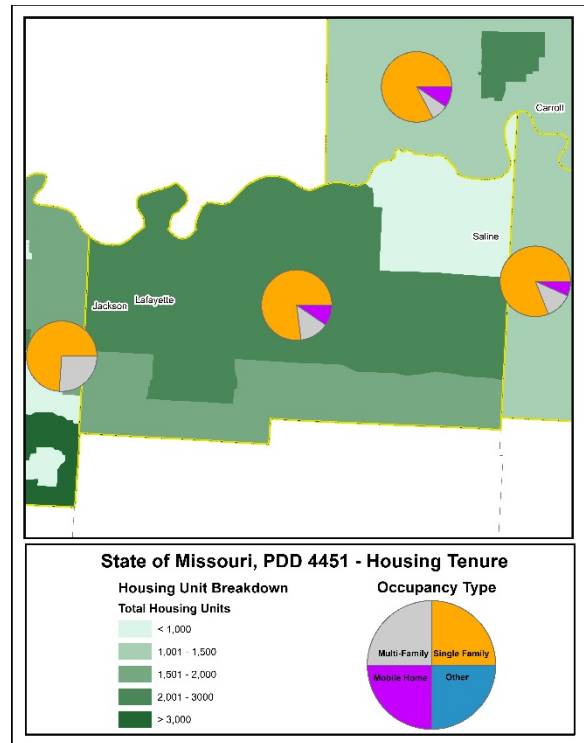
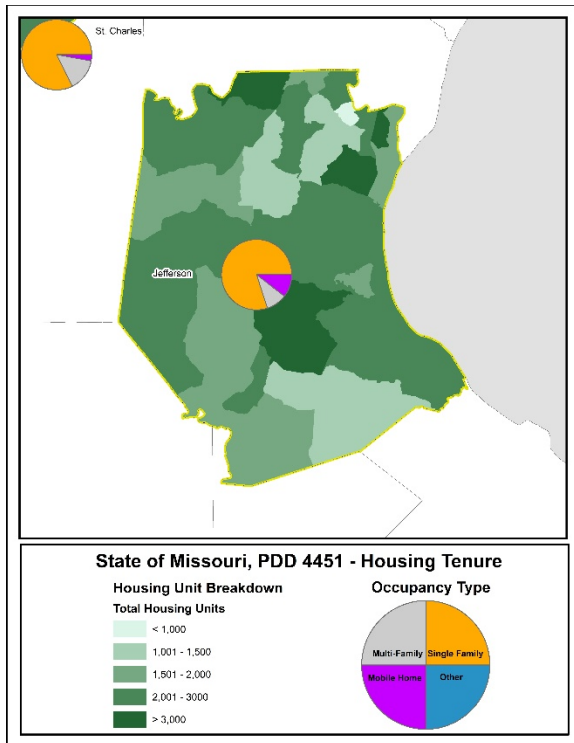
## APPENDIX L: DR-4451 HOUSING OCCUPANCY

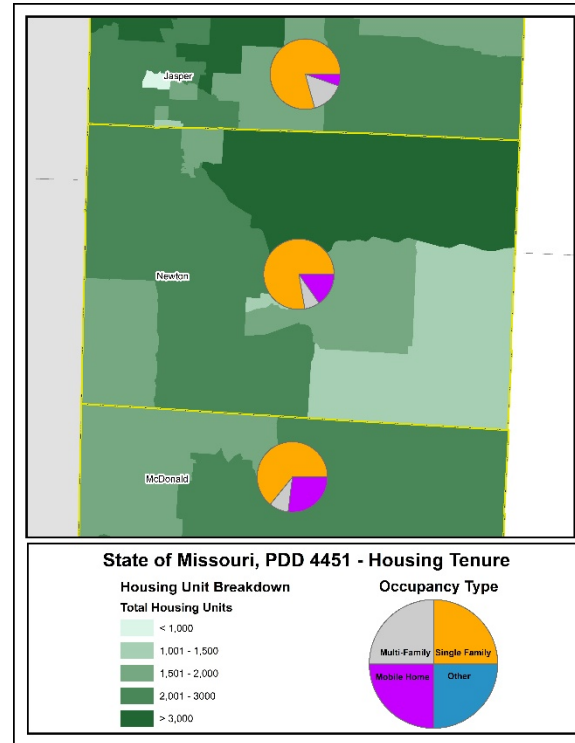
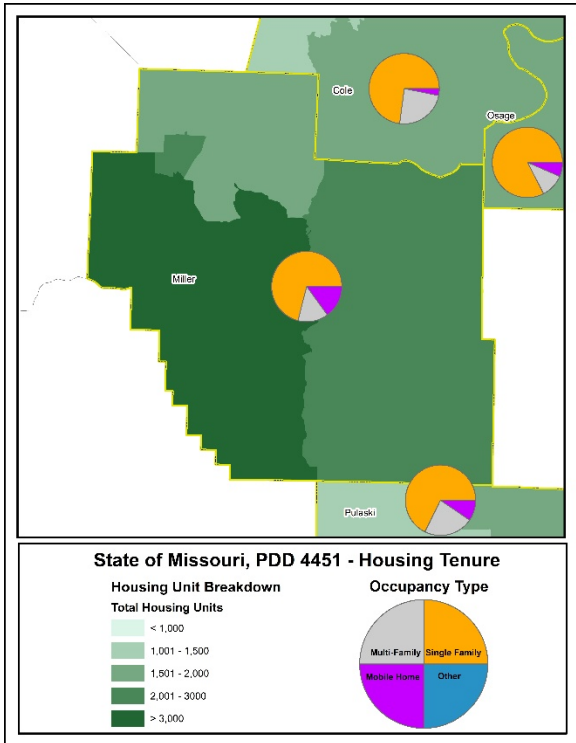
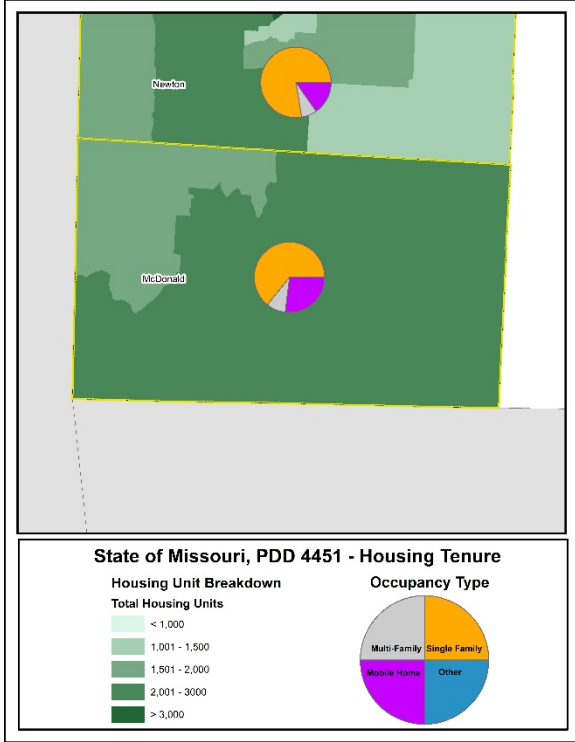
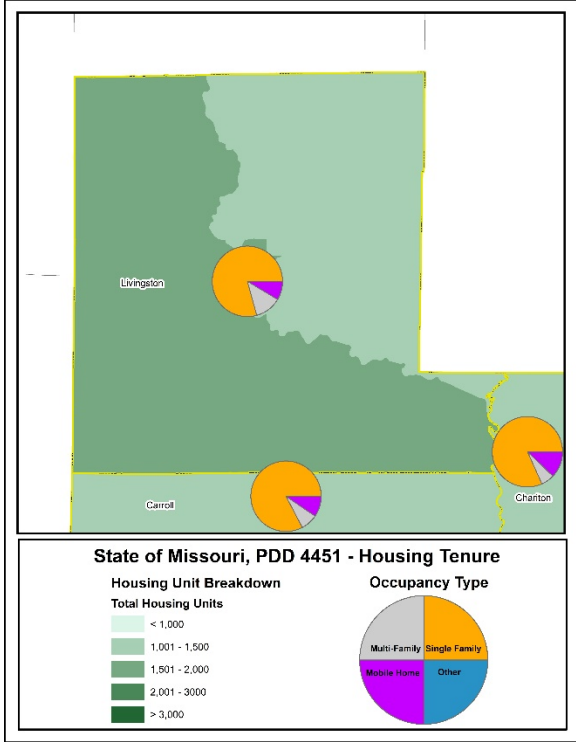


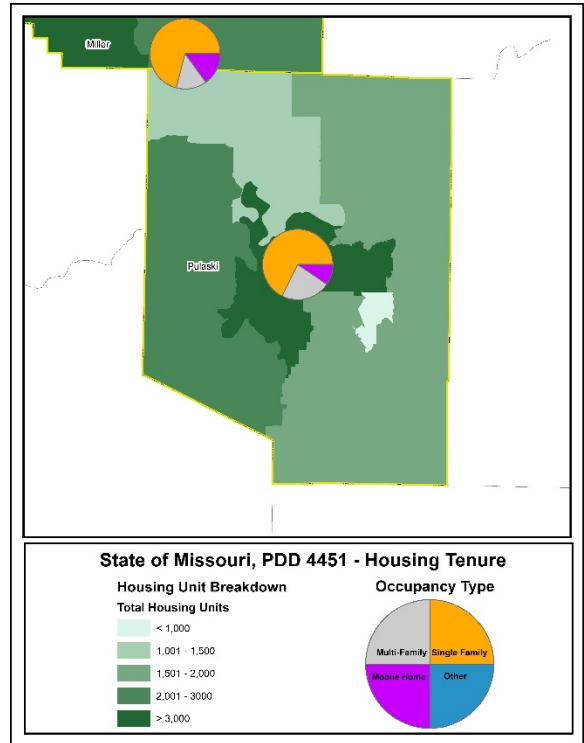
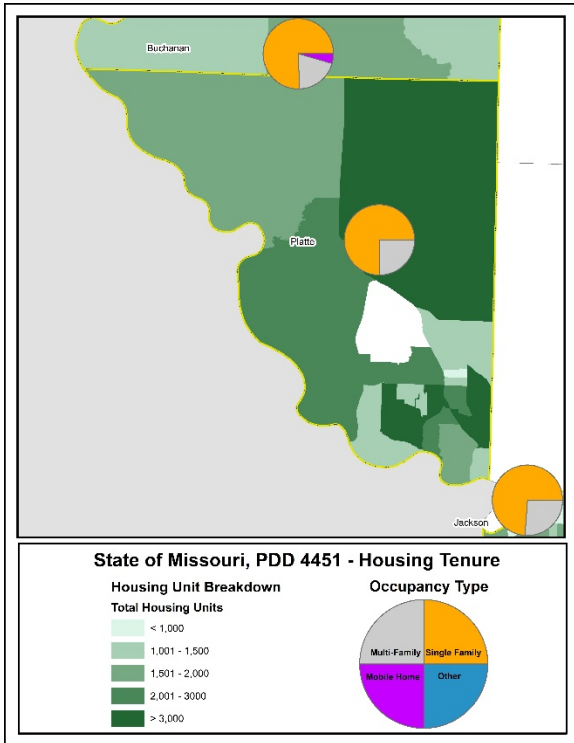
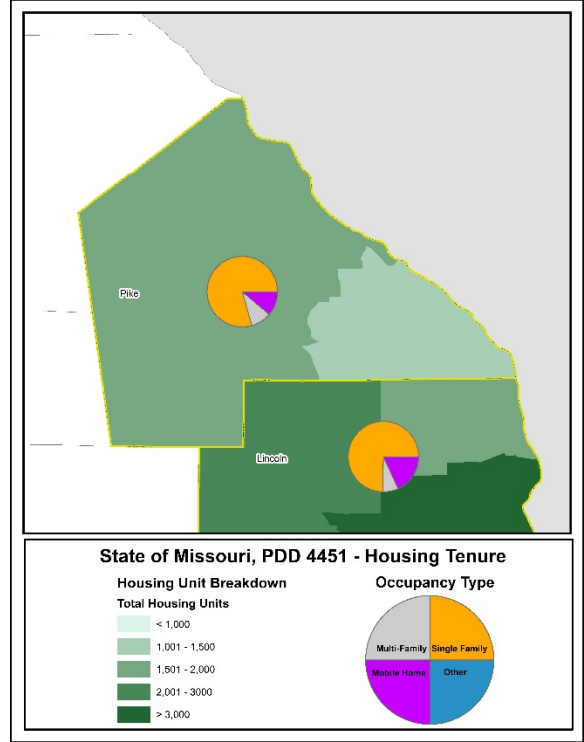
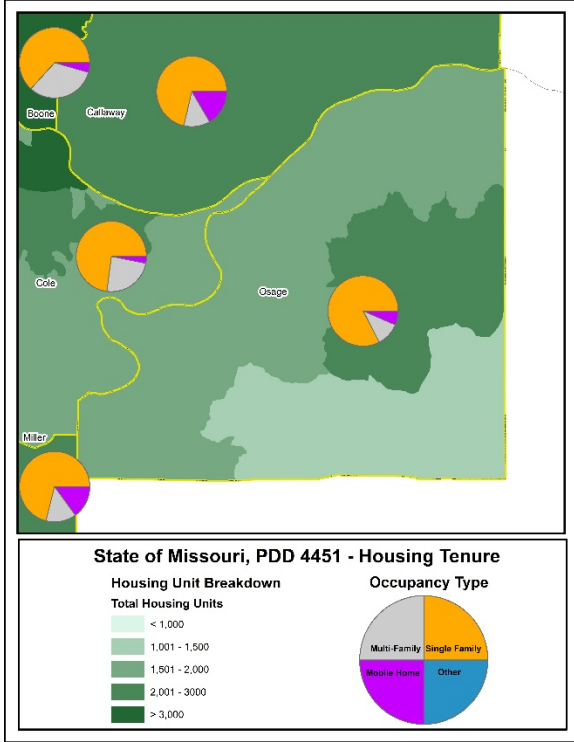


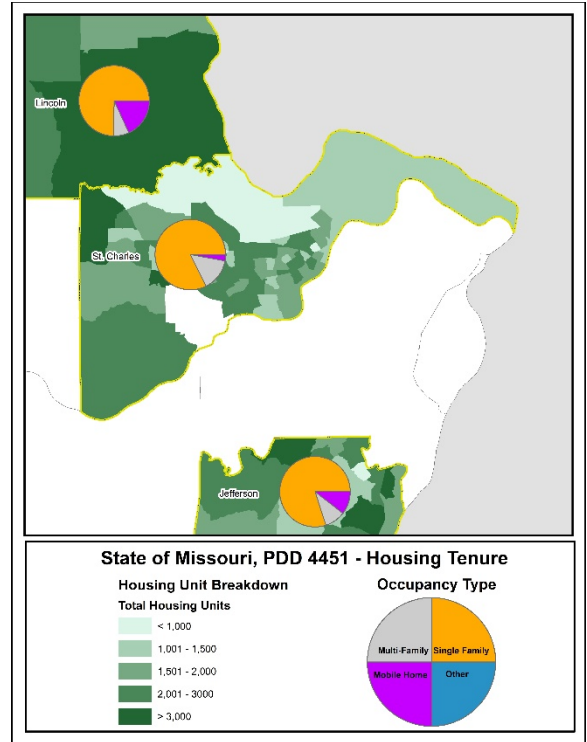
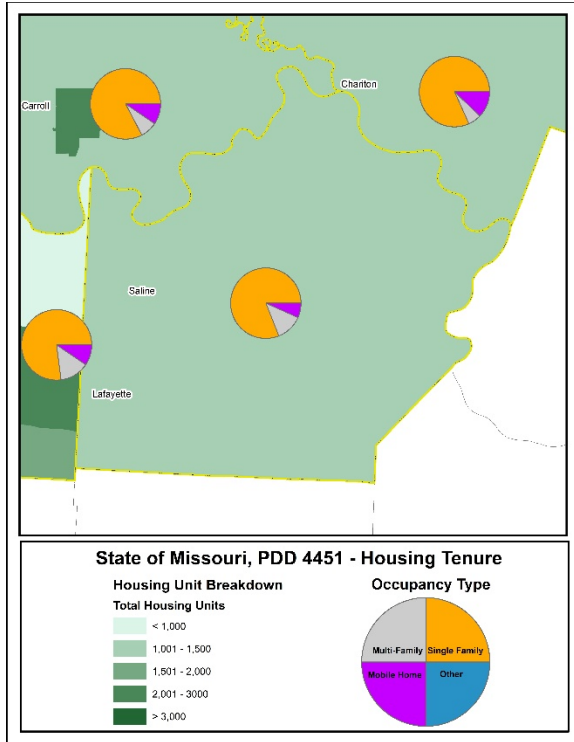




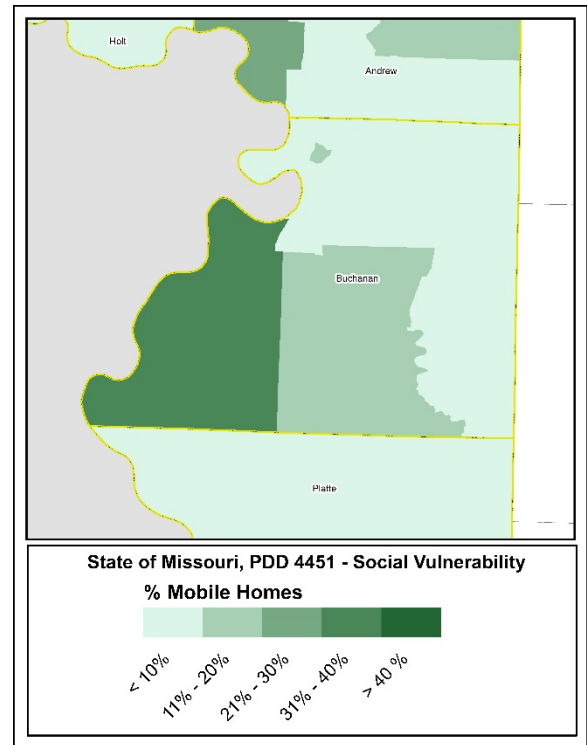
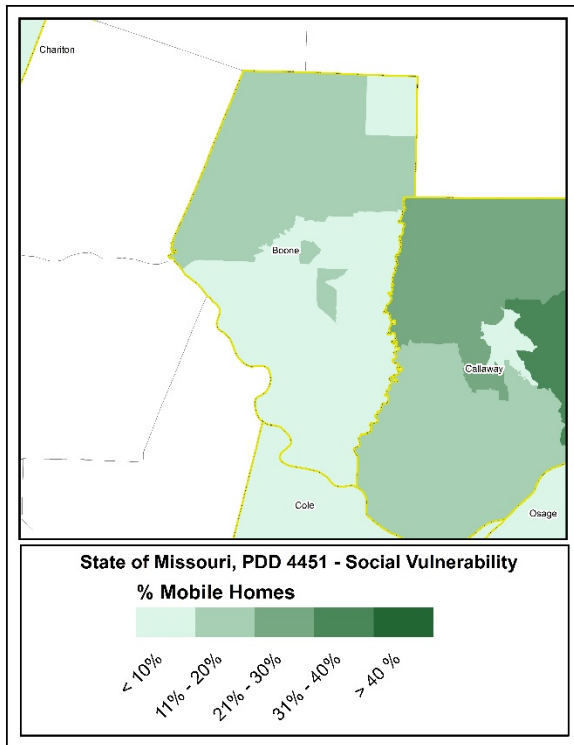
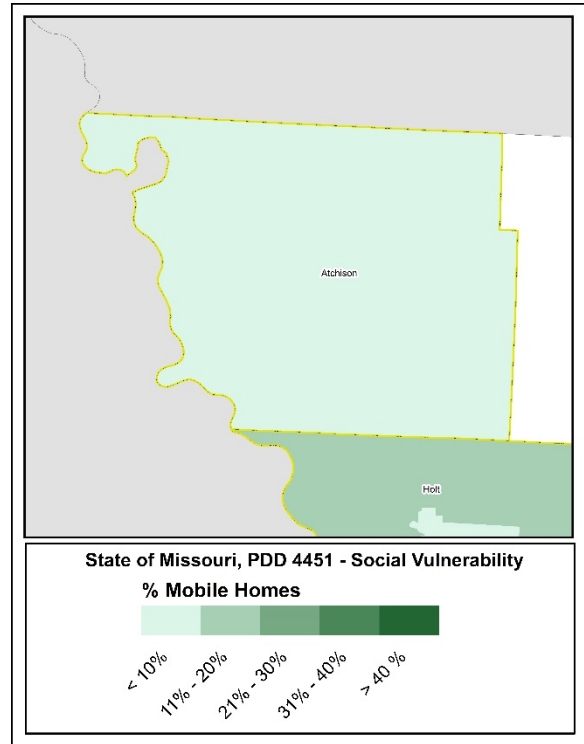
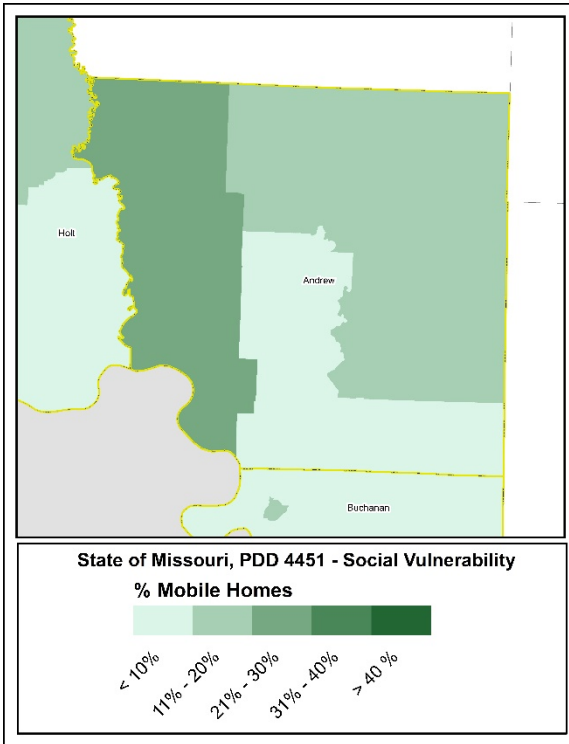


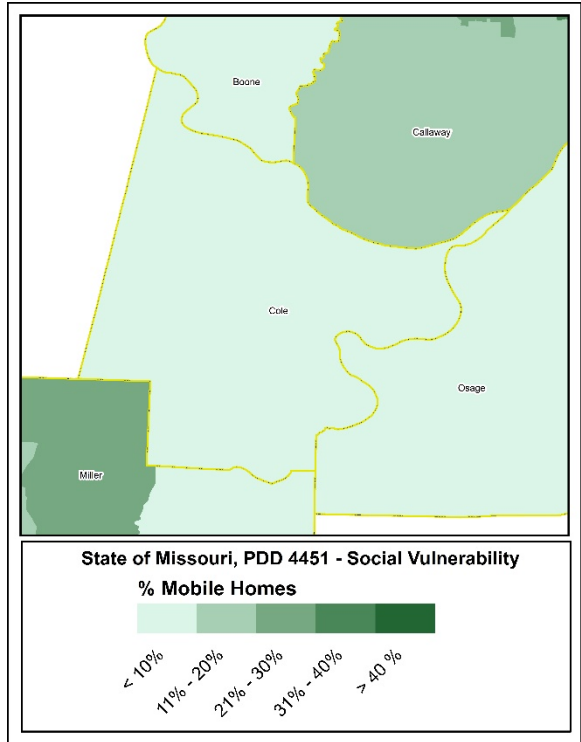
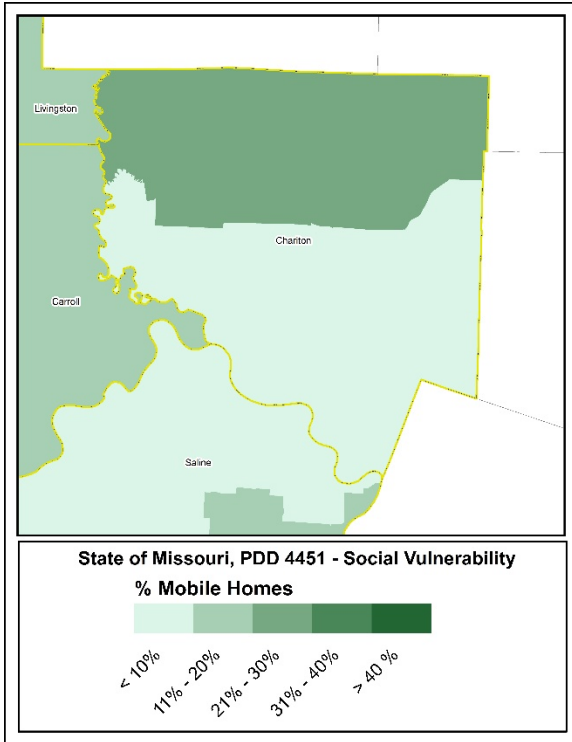
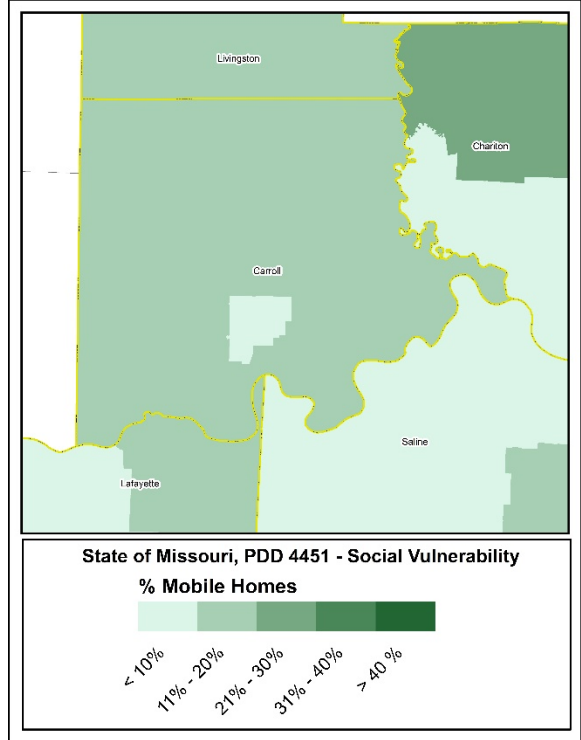
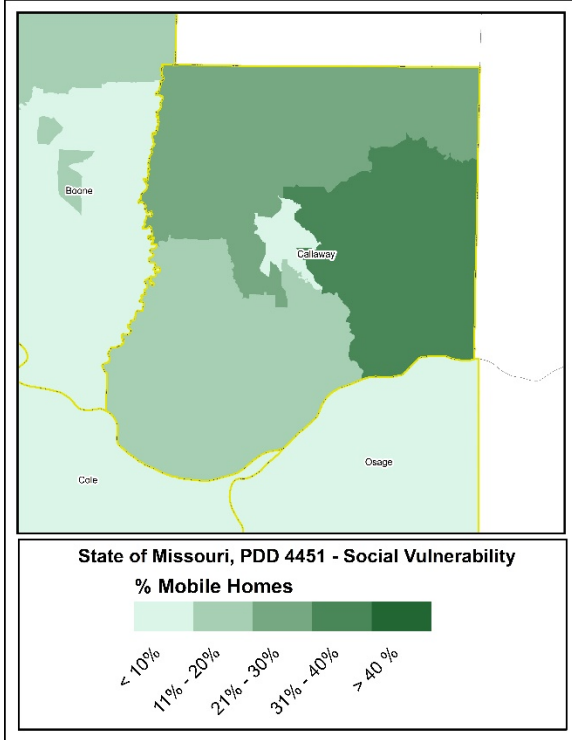


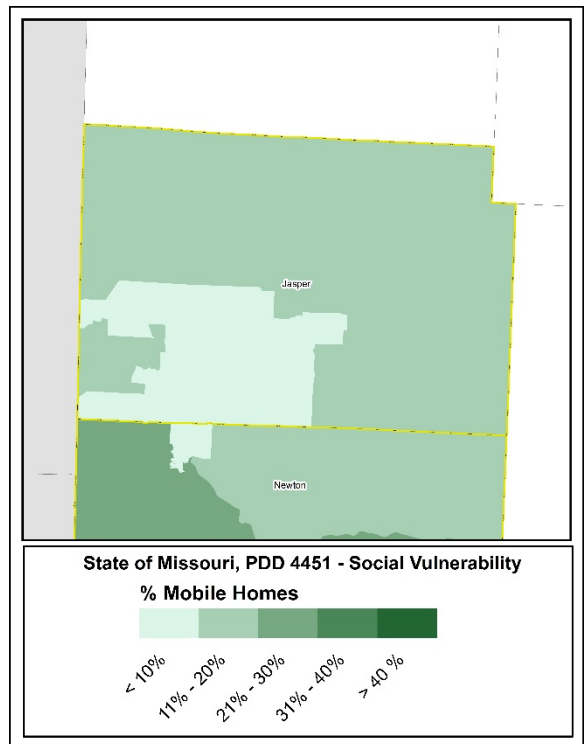
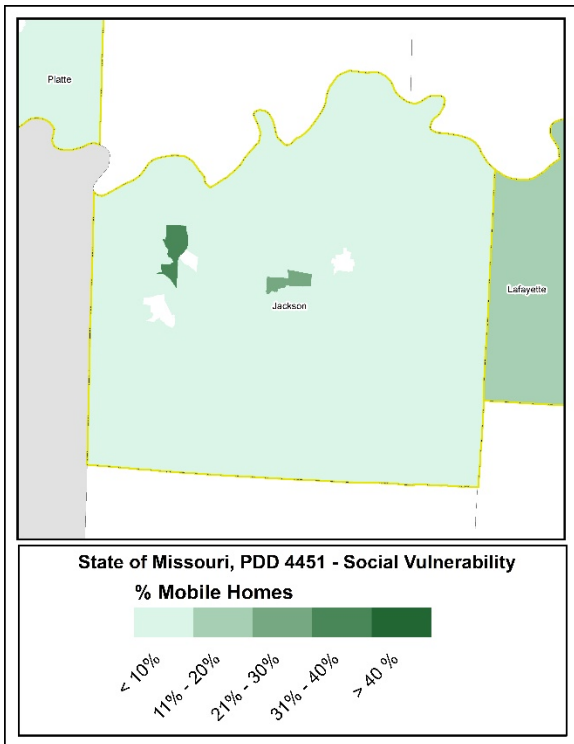
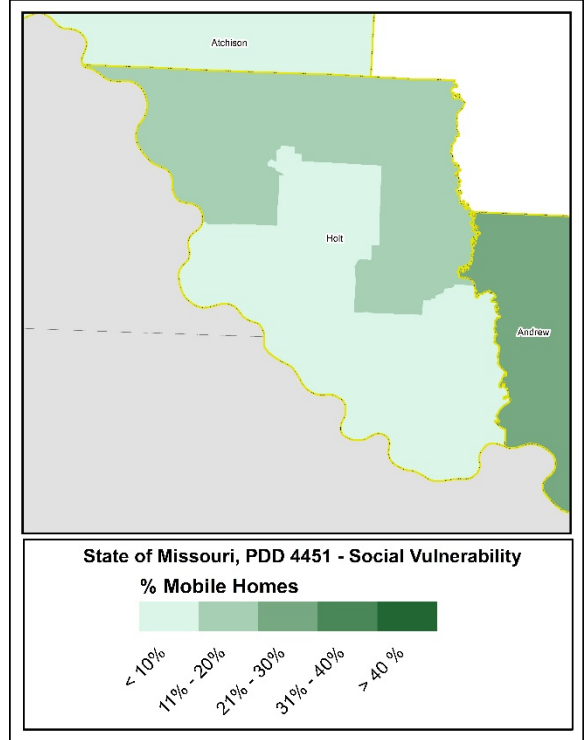
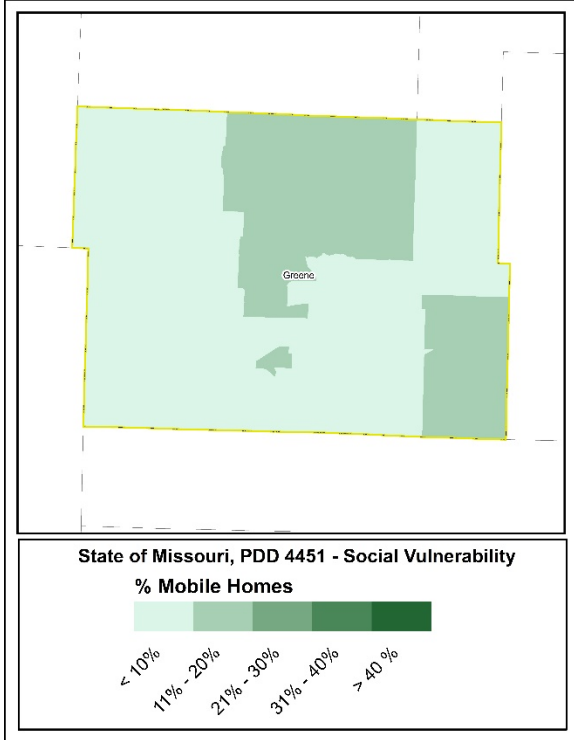




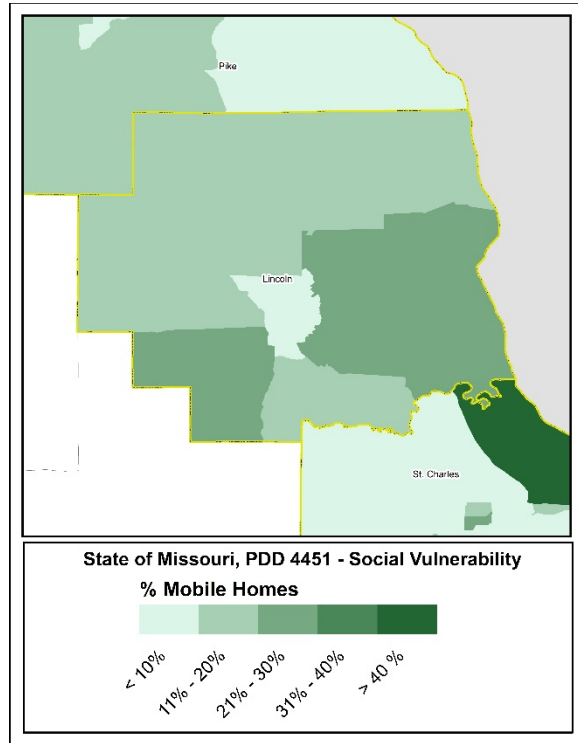
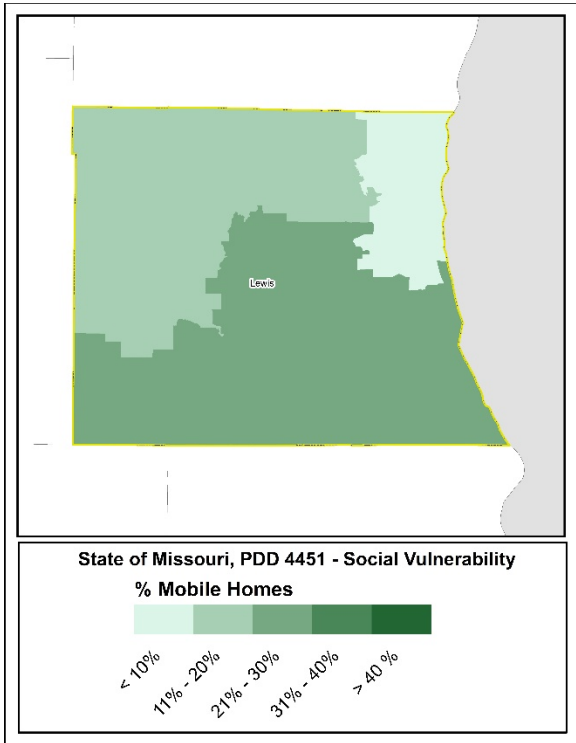
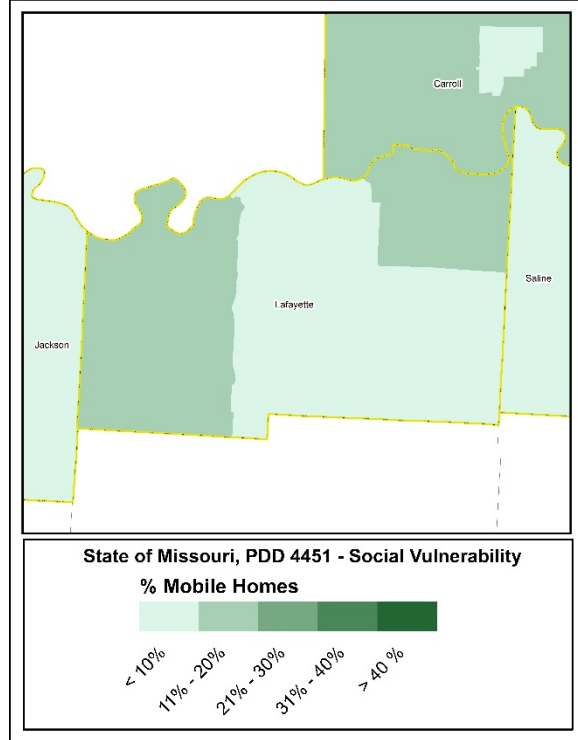
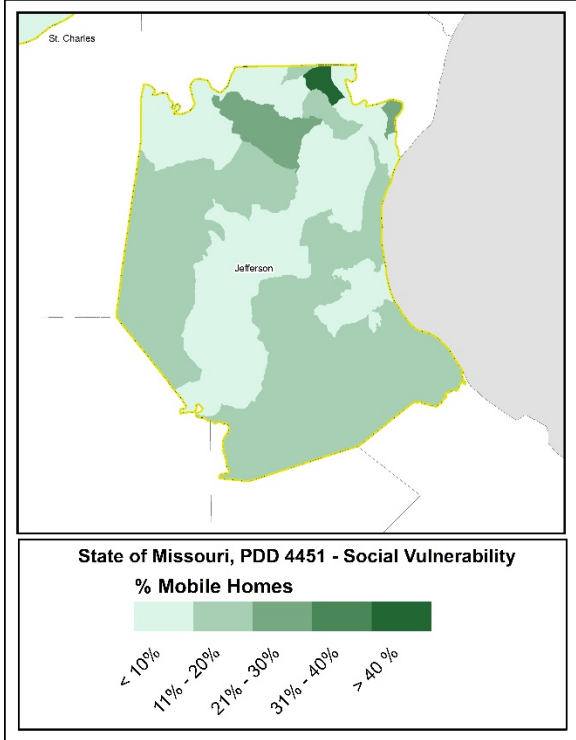
APPENDIX M: DR-4451 COUNTY MOBILE HOMES

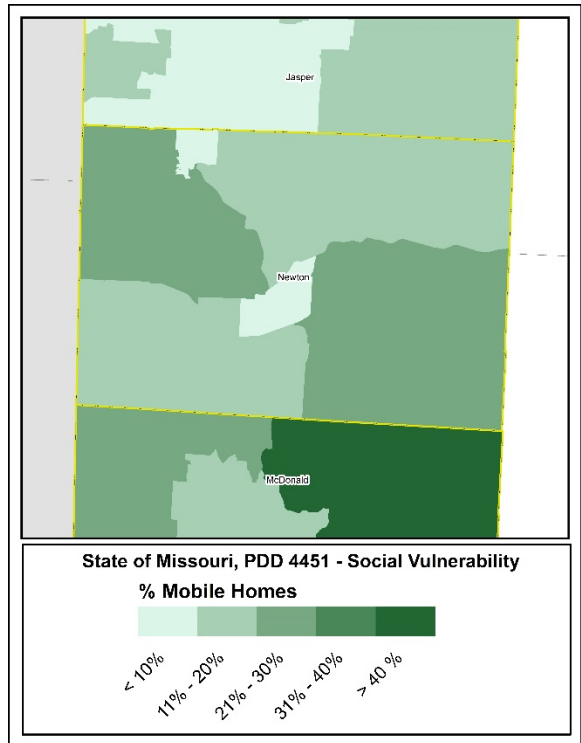
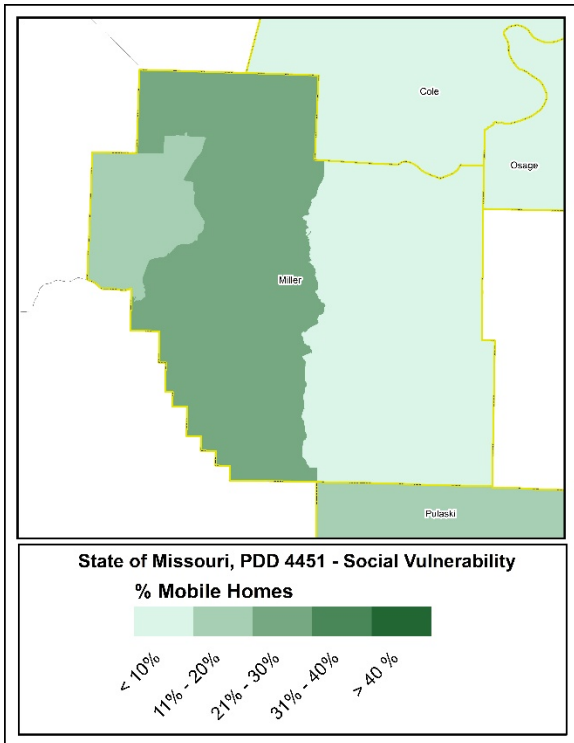
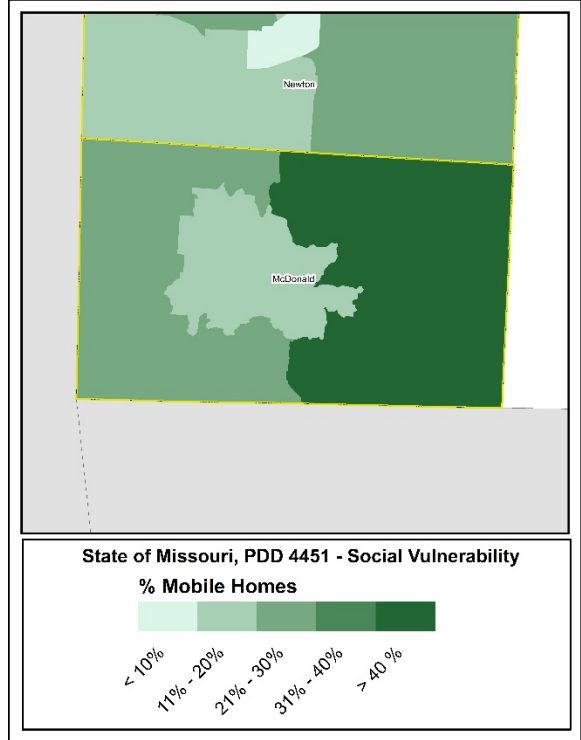
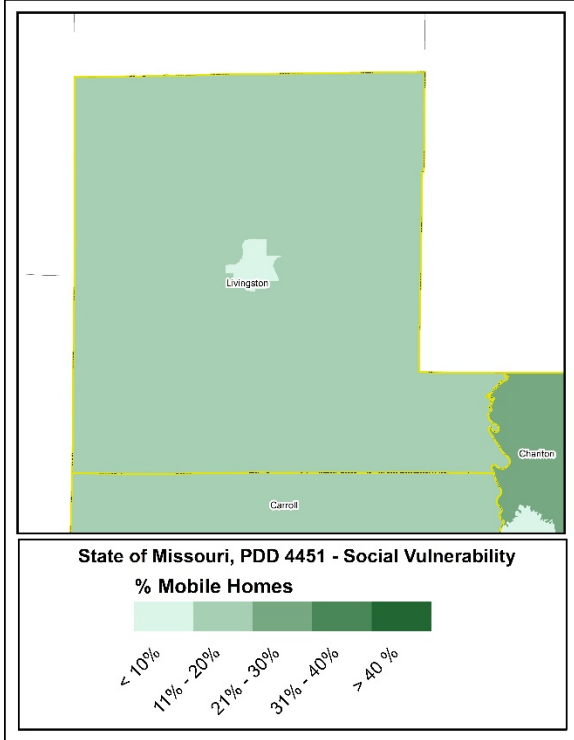


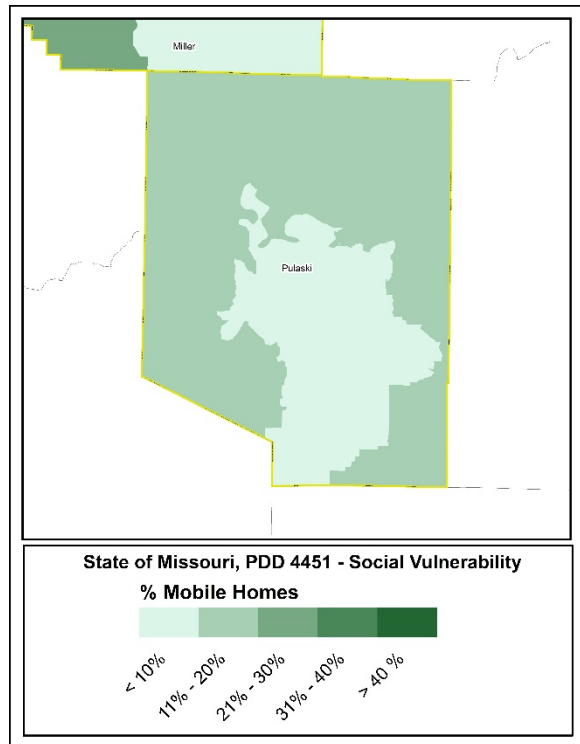
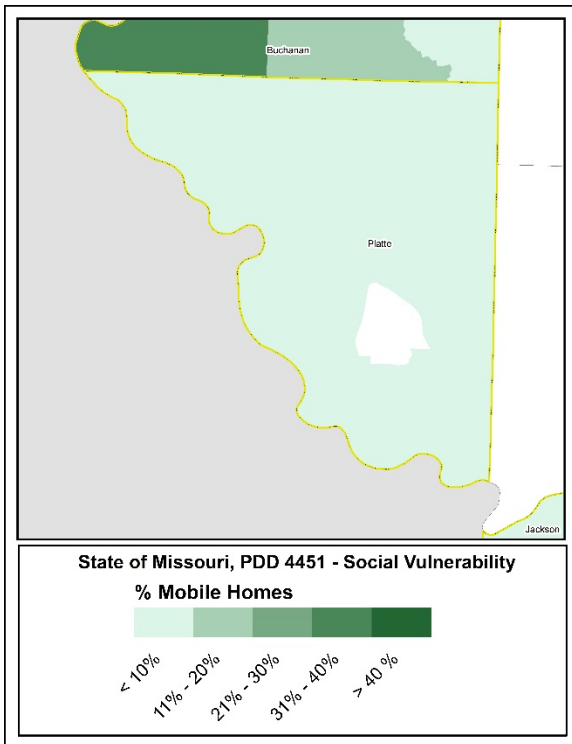
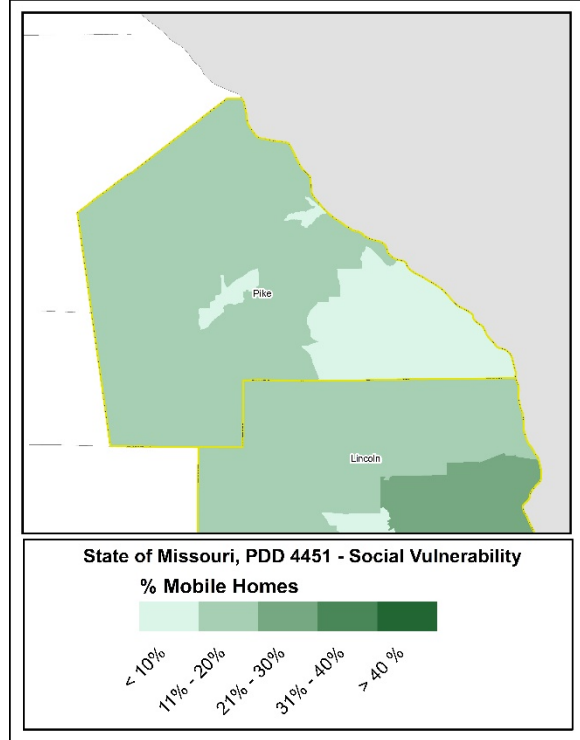
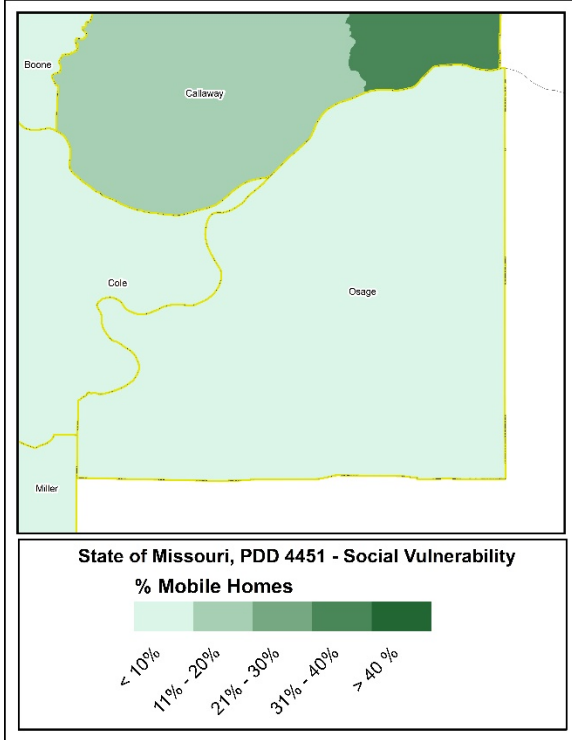


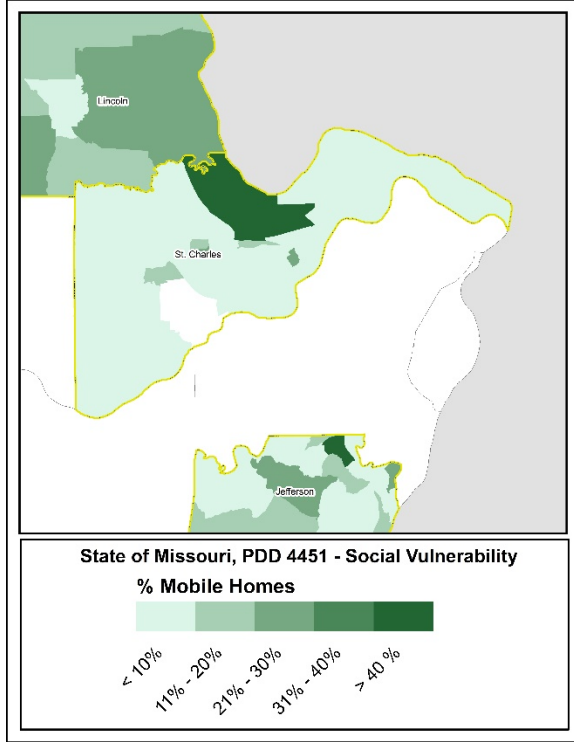
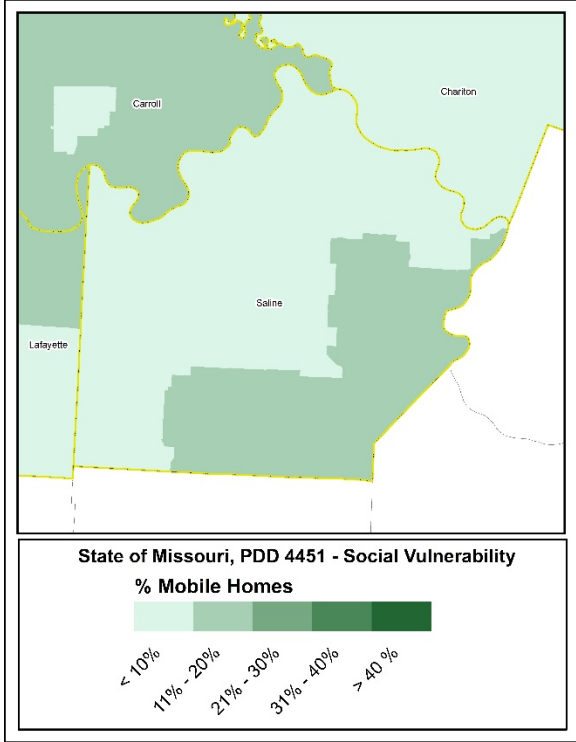












APPENDIX N: DR-4451 SF-424, SF-424D, AND CERTIFICATIONS

OMB Number: 4040-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="08/11/2020"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="State of Missouri"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="44-6000987"/>	* c. Organizational DUNS: <input type="text" value="8790146860000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="301 West High"/>	Street2: <input type="text" value="P.O. Box 118"/>	
* City: <input type="text" value="Jefferson City"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MO: Missouri"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="65101-1517"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Economic Development"/>	Division Name: <input type="text" value="Business and Community Solutions"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Mary"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Rajek"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="CDBG Program Manager"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="573-508-4113"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="mary.rajek@ded.mo.gov"/>		

**Application for Federal Assistance SF-424**

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

CFDA Title:

**\* 12. Funding Opportunity Number:**

B-19-DF-29-0001

\* Title:

State Community Development Block Grant Disaster Recovery

**13. Competition Identification Number:**

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

The above referenced funds are administered by the State of Missouri for areas of the state for various community and economic development projects. Disaster 4451

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="30,776,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="30,776,000.00"/>

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

- a. This application was made available to the State under the Executive Order 12372 Process for review on .
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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

Yes  No

If "Yes", provide explanation and attach

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

\*\* I AGREE

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

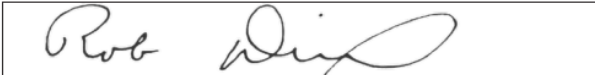
**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

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

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

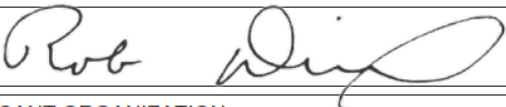
**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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

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



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director, MO Dept. of Economic Development
APPLICANT ORGANIZATION Missouri Department of Economic Development	DATE SUBMITTED 1/29/21

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

## APPENDIX C – CERTIFICATIONS, SF-424, AND WAIVER AND ALTERNATIVE REQUIREMENT

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

- A. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- B. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- C. The grantee certifies that the action plan for disaster recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with funds under this notice are consistent with its action plan.
- D. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this notice.
- E. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.
- F. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- G. State grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.
- H. The grantee certifies that it is complying with each of the following criteria:
  - a. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2019 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
  - b. With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible

- priority to activities that will benefit low- and moderate-income families.
- c. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.
  - d. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG- DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
    - i. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
    - ii. For purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (i).
  - l. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601– 3619), and implementing regulations, and that it will affirmatively further fair housing.
  - J. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing:
    - a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
    - b. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
  - K. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 116-20 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.

A handwritten signature in black ink, appearing to read "Rob Dixon", written in a cursive style.

Robert B. Dixon

Director, Missouri Department of Economic Development