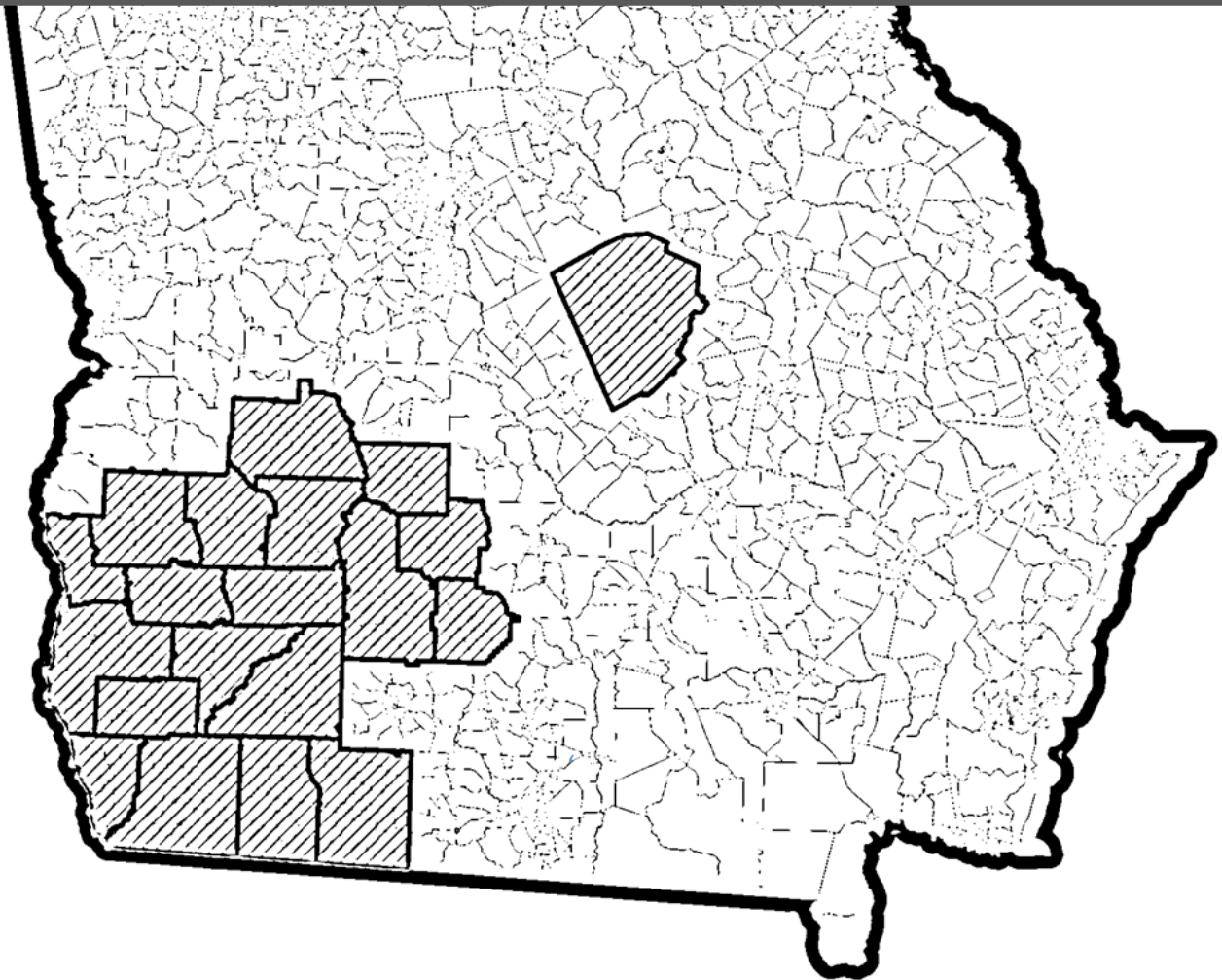




State of Georgia

Action Plan for Disaster Recovery



To be submitted to the U.S. Department of Housing and Urban Development (HUD) on September 13, 2022 to fulfill requirements related to Community Development Block Grant Disaster Recovery (CDBG-DR) Funds in Response to Disaster DR-4400.

Amendment Changes

Description	Section	Page
Deletion of Small Business Program reference	2. Community Analysis	Pg. 13
Deletion of Small Business Program reference; Addition of information regarding MID expansion request	4. Method of Distribution	Pg. 43
Updated map to show all 3 MID zip codes	4. Method of Distribution	Pg. 44
Updated MID zip codes; Updated Figure 62: Programs and Allocations table	4. Method of Distribution	Pg. 46
Updated information for the Homeowner Rehabilitation and Reconstruction Program	4. Method of Distribution	Pg. 47
Deletion of Small Business Economic Revitalization Program	4. Method of Distribution	Pg. 49
Updated information for the Infrastructure Program	4. Method of Distribution	Pg. 50
Clarification added to application review process	4. Method of Distribution	Pg. 52
Deleted reference to Small Business Program; Updated information for Workforce Development Program for clarity	4. Method of Distribution	Pg. 53
Updated Figure 63: Unmet Needs Expenditure Schedule	4. Method of Distribution	Pg. 54
Updated Figure 64: Low-to-Moderate Income Budget	4. Method of Distribution	Pg. 55
Deletion of Small Business Program reference	4. Method of Distribution	Pg. 56
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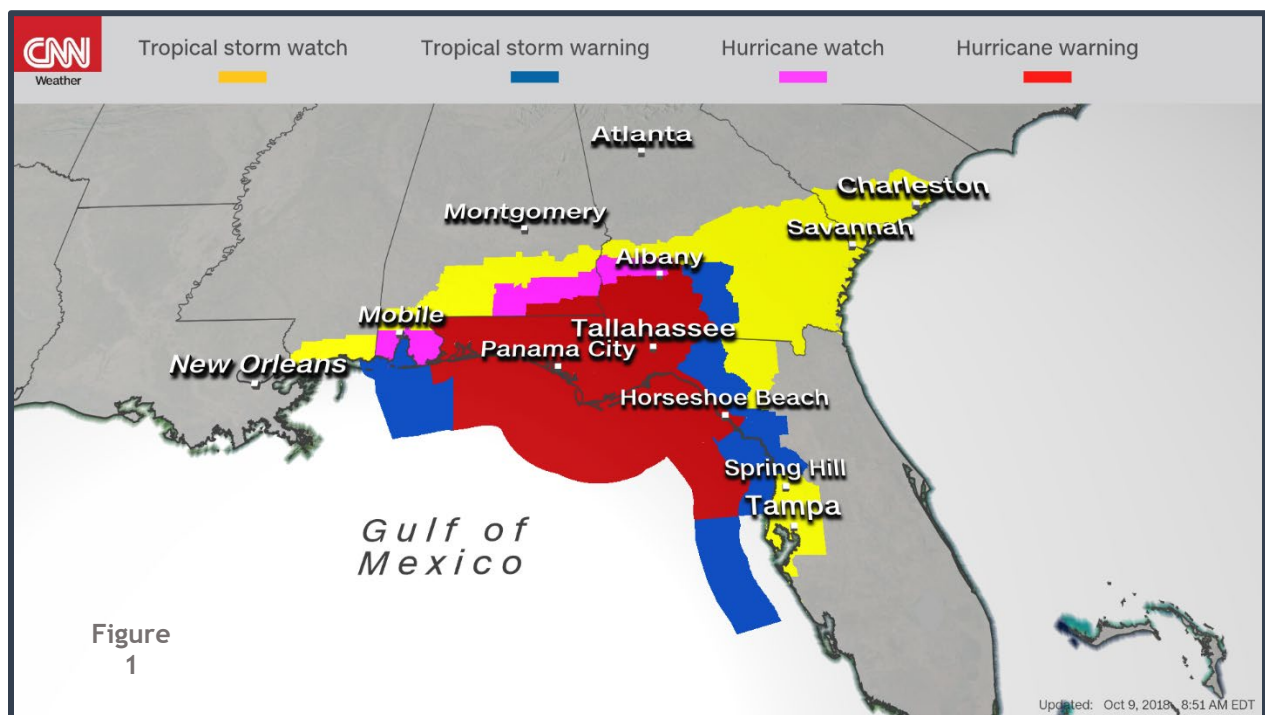
1. Introduction

Executive Summary

Under the 2018 Supplemental Appropriations for Disaster Relief Act, the State of Georgia was allocated \$41,837,000 to assist in long-term recovery from Hurricane Michael (DR-4400). Guidance provided by the Department of Housing and Urban Development (HUD) in Federal Register Notice 85 FR 4681, released on January 27, 2020, required the State of Georgia to prepare an Action Plan detailing the proposed use of the funds. This Action Plan details the conditions of the region, unmet needs of the communities, and a Method of Distribution to meet those needs. The Action Plan also contains a separate Pre-Implementation Plan that details how the State will carry out its duties under this allocation. Lastly, the Citizen Participation Plan (CPP), SF-424, and Action Plan Certifications for this allocation are included as appendices to this document.

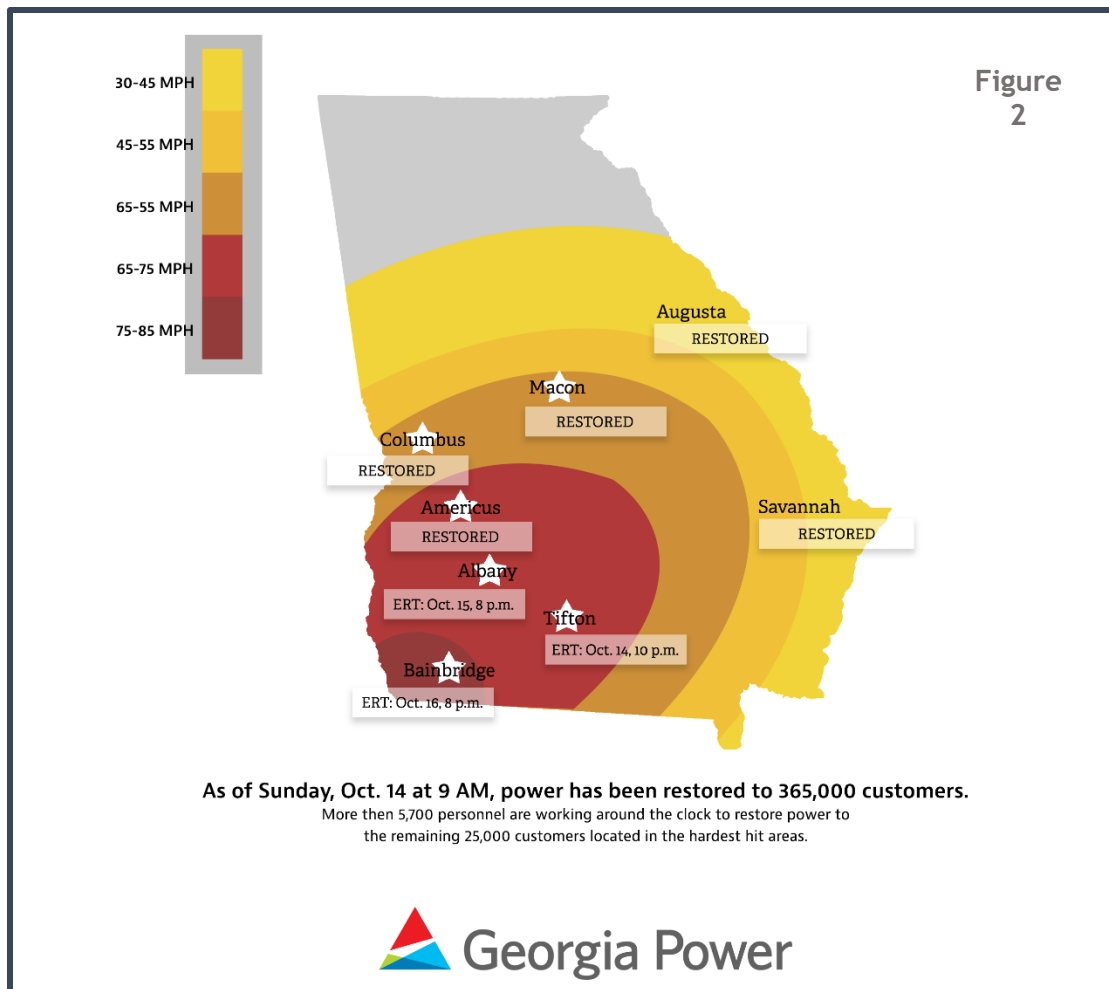
Overview of Disaster

Hurricane Michael was the strongest hurricane on record to make landfall along the Florida panhandle and the first major hurricane (Category 3+) to directly impact Georgia since the 1890s. On Wednesday October 10, 2018, wind gusts with hurricane force winds as high as 115 mph were recorded in Southwest Georgia, specifically in Seminole County. Other areas, such as Crisp County, had approximately 76 Mph winds and portions of central Georgia sustained winds of 40-50 mph with gusts in the 60-75+ mph. Additionally, a few brief tornadoes in the outer bands of Hurricane Michael caused sporadic damage in portions of the area while heavy rainfall led to localized flooding. Figure 1, below, shows the path of Hurricane Michael. Within Georgia, the Southwest areas experienced the greatest impact from the storm. The hurricane blew through Georgia and exited as a tropical storm on the morning of October 11, 2018.



Although the hurricane moved swiftly through Georgia, the storm left behind a vast amount of damage and debris. According to the National Hurricane Center Tropical Cyclone Report prepared by NOAA, a swath of major wind damage to both structures and agriculture/forestry occurred along the track of Michael from the Florida Panhandle across extreme southeastern Alabama into southwestern and central Georgia. The town of Donalsonville in Seminole County, Georgia reported damage to 99% of the homes, along with severe damage to timber and agriculture. Also hard hit was Dougherty County, Georgia, including the City of Albany, which reported damage to 3,000 residential structures (including 49 destroyed) and significant damage to timber and agriculture. In addition, fallen trees and windswept debris caused further damages to homes, buildings, and other infrastructure.

According to the Donalsonville News, the morning after the Hurricane 100 percent of Seminole County residents were without electrical power because of snapped poles and thousands of trees blown onto lines. Further, at some point, fallen trees and/or debris blocked every road in Seminole County. For some within the region, power outages lasted up to a week or even a bit longer for some areas. According to Georgia Power, damage from the hurricane included more than 3,500 spans of wire down (about 130 miles), approximately 1,000 damaged power poles, more than 900 fallen trees and more than 200 damaged transformers.



The widespread nature of the damage resulted in millions of dollars in cleanup costs alone. Numerous trees fell onto homes and businesses, causing additional damage. Many of the communities that experienced damage are rural and have small population sizes making resources scarcer and recovery more difficult. Baker County and Clay County have just over 3,000 people in each county. Within these very rural counties are cities with small staff sizes or part-time employees. These communities worked for weeks and months following the storms. Recovery tasks included: clearing roads, debris cleanup, flushing water lines, repairing lift stations, patching potholes, shoring-up storm drains, and a myriad of other responsibilities. Cities and counties with more robust budgets and staffs were able to complete these tasks in a matter of days. The cities that have larger staffs and budgets are still experiencing outsized problems and costs to match. Dougherty County, the most populated county in the area affected by Hurricane Michael, experienced devastating tornadoes in 2017. This community, and many others, were not fully able to recover from one disaster before another one struck. Figure 3 shows the map of the counties declared eligible for FEMA’s Individual Assistance and Public Assistance. The areas in orange were declared eligible for public assistance, but not individual assistance.

FEMA-4400-DR, Georgia Disaster Declaration as of 11/15/2018

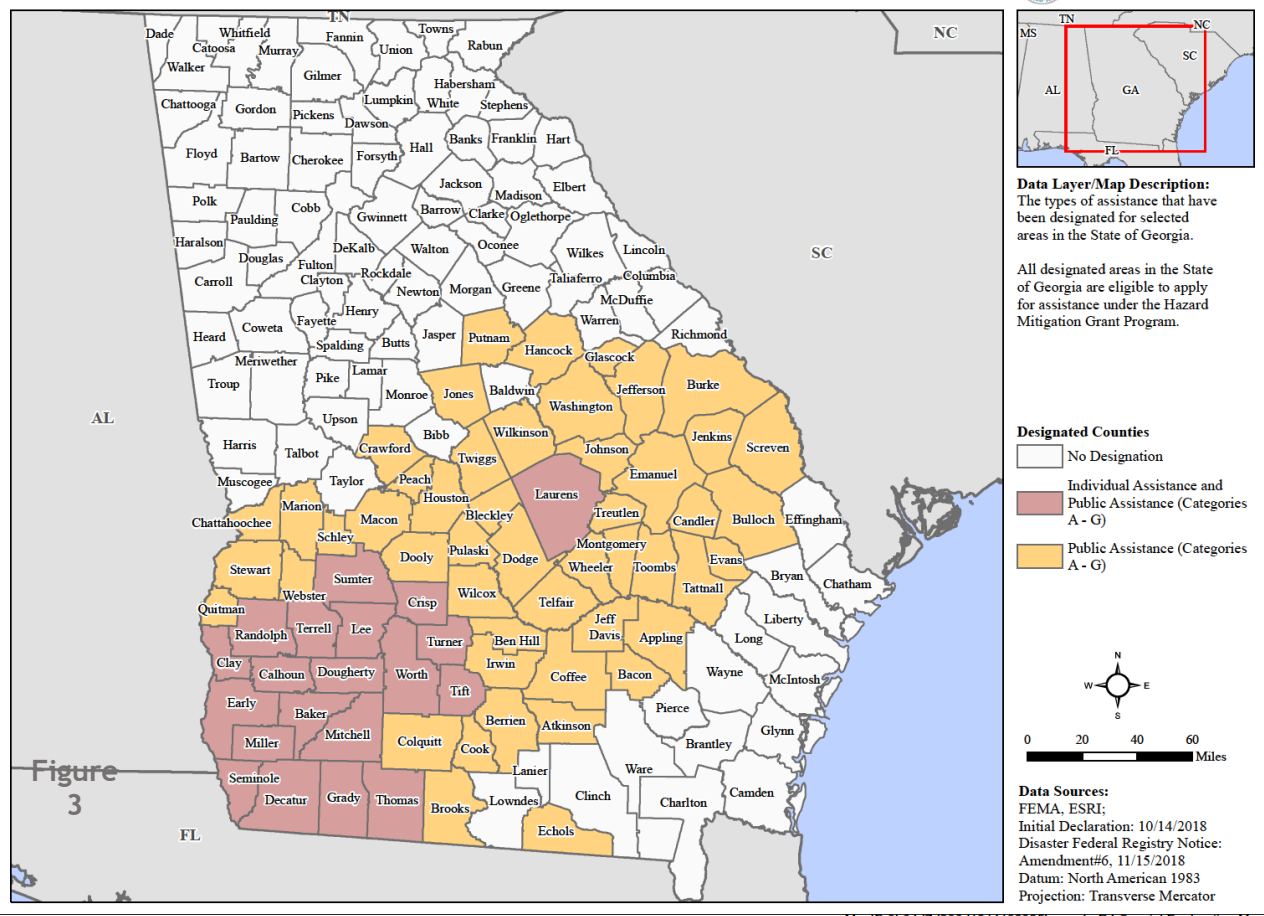
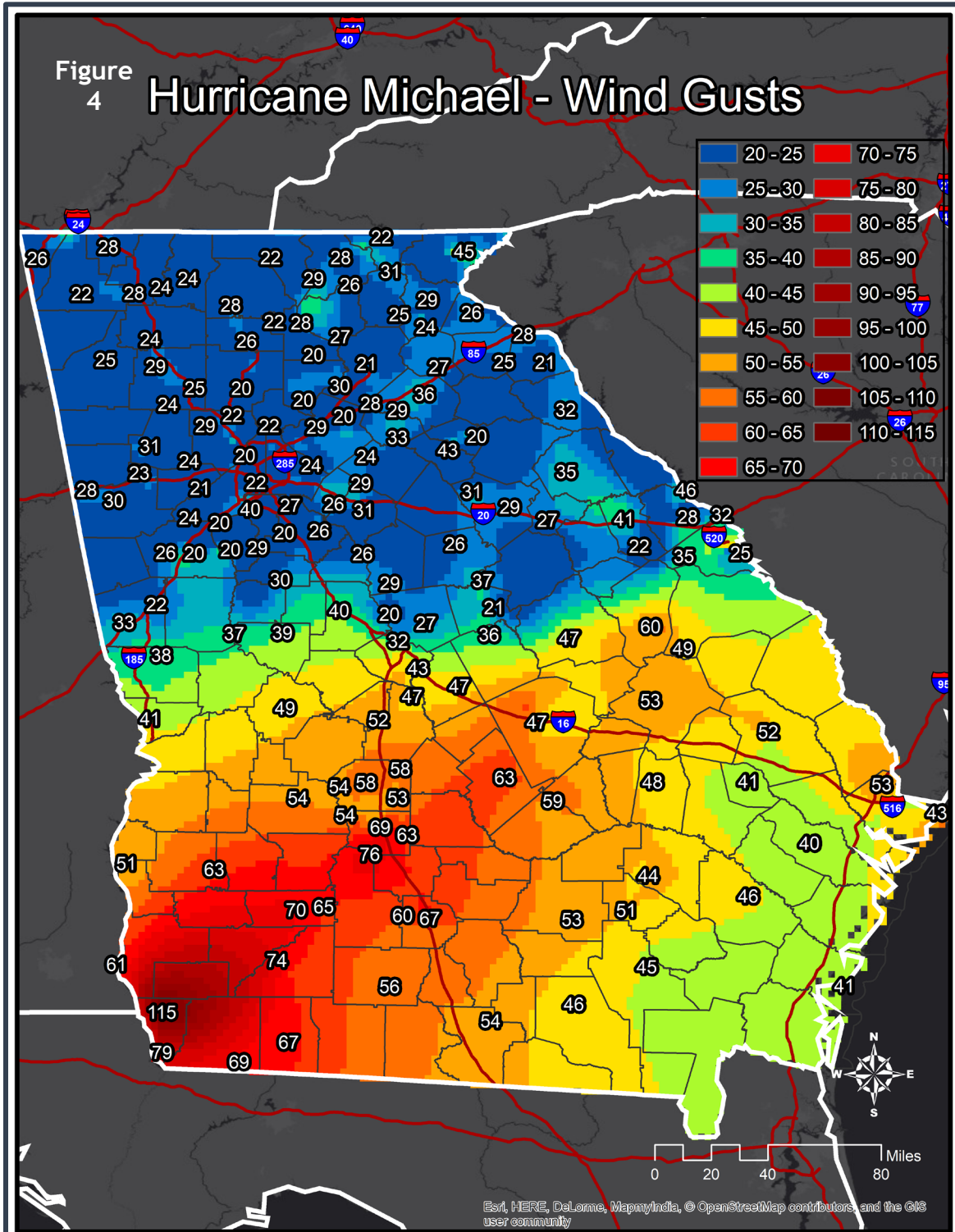


Figure 3

The map below displays the strong wind gusts recorded across the State of Georgia during Hurricane Michael. Note: Wind gusts were likely stronger than displayed for a number of locations in central and south Georgia; however, recording instruments failed as electrical power and communications were lost. As seen in Figure 4, while the entire State of Georgia was impacted the Southwest corner felt the brunt of the storm.



The places and their struggles brought on by Hurricane Michael were featured in local, state, and national news articles in the aftermath of the storm. The hurricane destroyed many homes, businesses, and infrastructure. As seen in Figure 5 below, a resident used his tractor to drag a piece of oak tree downed by Hurricane Michael out of a neighbor's yard in Bainbridge. Photo credit: Grant Blankenship/GPB



Figure 5

Below, an image captured by Grant Blankenship with Georgia Public Broadcasting shows businesses in the City of Albany directly after the Hurricane. Businesses with this level of damage may not have the resources available to recover from disaster.



Figure 6

Public Outreach

An Initial consultation with the Georgia Emergency Management and Homeland Security Agency (GEMA/HS) occurred immediately following Hurricane Michael in October 2018. DCA met with GEMA/HS and supplied staff members to be in place at the command center as part of the emergency support function (ES14) team. Following the work on the Support Function Team, DCA's DR staff stayed in constant contact with the local governments to begin understanding the extent of the damage and unmet needs. On February 4, 2020, DCA staff joined staff from Seminole County and the City of Donalsonville to survey unmet needs and discuss potential projects within the county.

DCA held public outreach meetings in two locations prior to the posting of the action plan in order to gain public participation in determining unmet needs in impacted communities. Below are the dates and locations of the meetings:

January 29, 2020 at Dougherty County Government Center
222 Pine Avenue, Albany, GA 31701 at 2:00 P.M.

February 5, 2020 at the Bainbridge City Hall Council Chambers
101 S. Broad Street, Bainbridge, GA 39817 at 10:00 A.M.

All impacted counties were requested to submit information to DCA regarding their remaining unmet needs. Several email conversations related to these unmet needs occurred between January and March 2020. Photographs from the meetings are shown in Figures 7 and 8.



2. Community Analysis

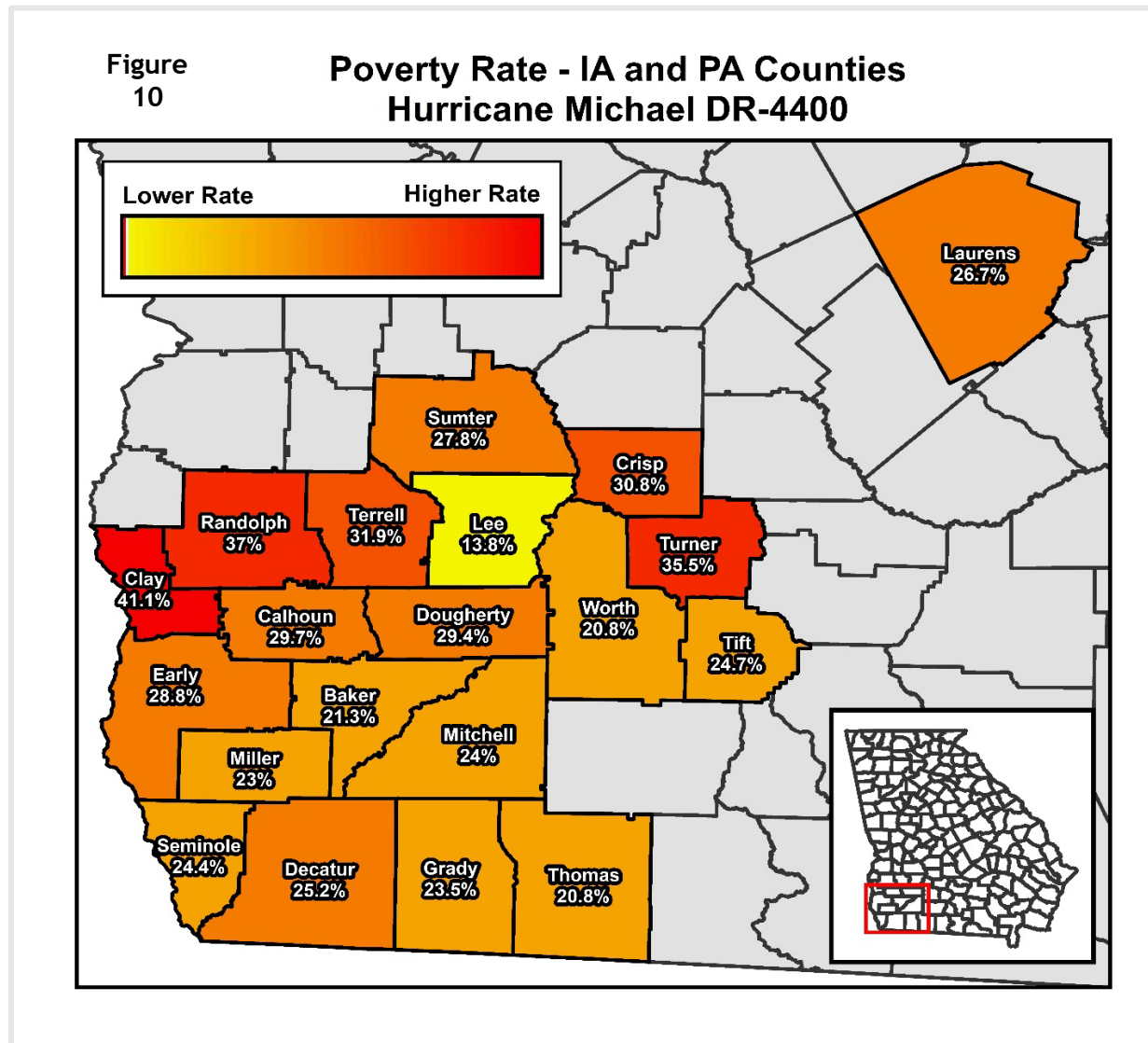
Demographic Overview

After Hurricane Michael, twenty counties in rural Southwest Georgia were presidentially declared eligible to receive Individual Assistance (IA) and Public Assistance (PA) from FEMA. This 20 county region overall is less populated and exhibits higher poverty rates than the State of Georgia. This section seeks provides a detailed analysis of the community background in order to determine the communities abilities to recover from Hurricane Michael and to provide background to unmet needs that exist within these communities.

County	Population	Median Household Income	Poverty Rate
Clay	3,001	\$25,000	41.1%
Randolph	7,087	\$30,914	37.0%
Turner	7,962	\$38,341	35.5%
Terrell	8,859	\$38,015	31.9%
Crisp	22,846	\$35,096	30.8%
Calhoun	6,428	\$31,725	29.7%
Dougherty	91,049	\$37,633	29.4%
Early	10,348	\$31,567	28.8%
Sumter	30,352	\$36,205	27.8%
Laurens	47,418	\$37,369	26.7%
Decatur	26,833	\$39,148	25.2%
Tift	40,510	\$42,790	24.7%
Seminole	8,437	\$34,338	24.4%
Mitchell	22,432	\$37,027	24.0%
Grady	24,926	\$42,348	23.5%
Miller	5,836	\$42,927	23.0%
Baker	3,189	\$37,188	21.3%
Thomas	44,730	\$40,112	20.8%
Worth	20,656	\$46,076	20.8%
Lee	29,348	\$65,420	13.8%

The populations within the counties of rural Southwest Georgia vary greatly, as seen in Figure 9. Baker County and Clay County have populations less than 3,200. Dougherty County, which has the largest population, is just over 91,000 people. While this is the largest city within the region, 91,000 people does not make up 1% of the State of Georgia's population. Even though Southwest Georgia covers a large geographic portion of the state, the number of people per square mile is significantly smaller than areas such as Atlanta, Augusta, Columbus, and Savannah.

Apart from Lee County, the remaining declared counties have significantly less median household income than the average for the State of Georgia in 2018 (\$55,821, ACS). A lower household limits what a resident can afford to repair after a storm. Additionally, if jobs were lost due to the storm, residents may be forced to choose between fixing their leaky roof and buying food for their family.



In 2018, the poverty rate for the State of Georgia was 14.3%. Lee County's poverty rate of 13.8% is the only one lower than the State of Georgia average. Clay County has a poverty rate of 41.1%, the highest within the region. In Clay County, four out of every ten persons is impoverished. With a poverty rate of 37%, Randolph County (neighbor to Clay County) has the second highest poverty rate. Overall, the southwestern corner of the state averages a poverty rate of 25%.

Clear differences exist between rural Southwest Georgia and the rest of the State. On Average, residents within the area tend to have lower household incomes and higher poverty rates. These factors lead to increased difficulty to recover quickly and fully from disasters.

Figure 11 provides a census-tract level comparison of the communities where greater than 51% of the population is considered to have low-to-moderate income. Within the 20-county impacted area, excluding Baker County and Lee County, there is a least one area that has greater than 51% low-to-moderate income concentrations within each of counties. Of the MID areas, Zip Code 39845 has the largest areas of concentrations of low-to-moderate income households. Zip Codes 31705 and 39817 both have census tracts of high concentration of low-to-moderate income households, but the tracts do not encapsulate the entire Zip Code.

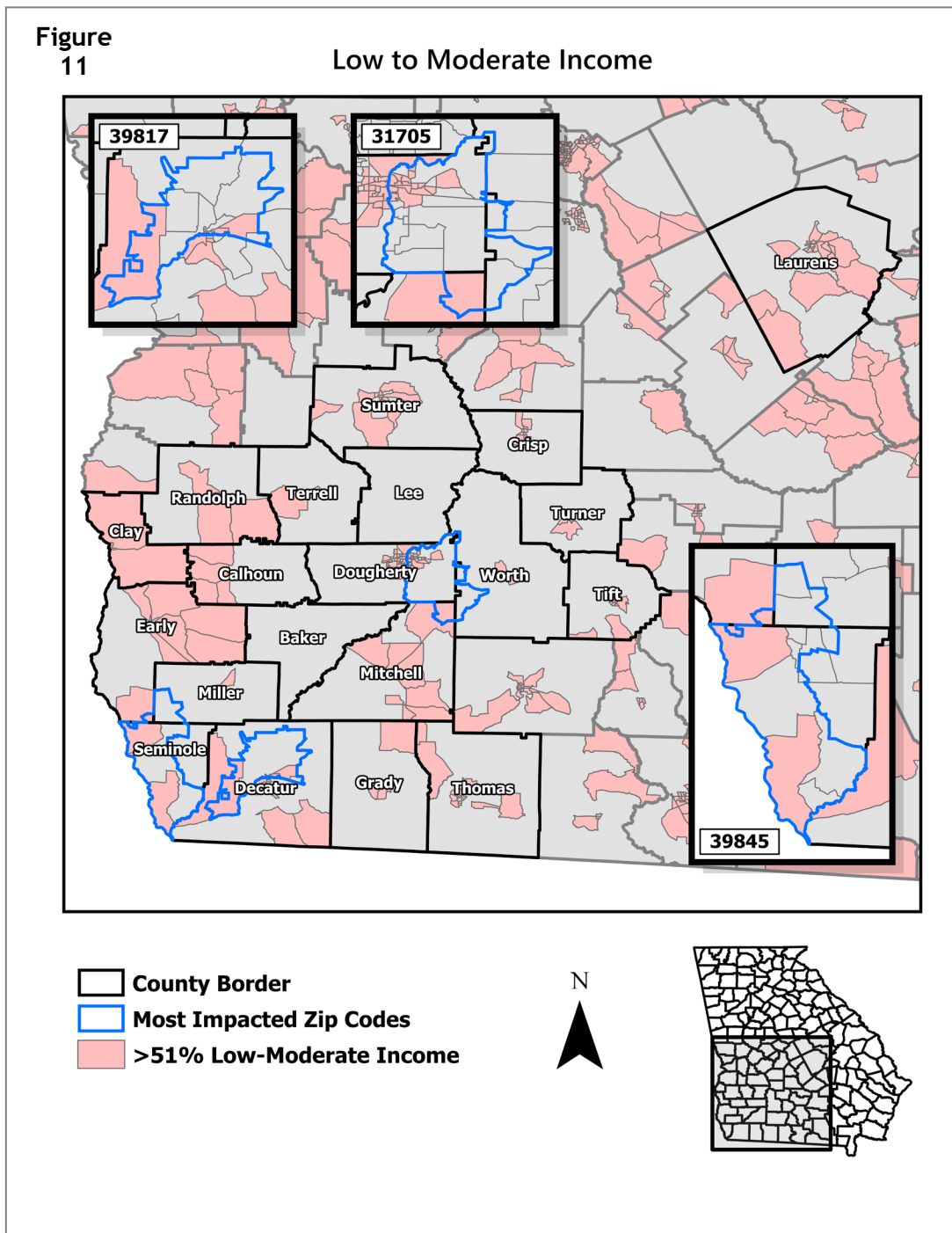


Figure 12: Demographics by County (ACS 2014-2018)

County	Median Age	Employment Rate	Total # of Businesses	% High School Education+
Baker	47.0	47.5%	25	78.3%
Calhoun	38.8	29.9%	73	74.3%
Clay	45.1	35.6%	38	79.9%
Crisp	38.8	49.5%	510	80.1%
Decatur	38.1	46.0%	589	81.6%
Dougherty	35.1	49.3%	2,276	82.5%
Early	40.7	46.1%	212	80.1%
Grady	39.7	53.2%	409	80.3%
Laurens	38.3	46.9%	1,049	85.1%
Lee	37.2	58.9%	396	90.6%
Miller	43.8	50.8%	114	82.3%
Mitchell	38.9	46.4%	354	74.7%
Randolph	40.0	45.3%	130	75.8%
Seminole	44.0	41.8%	195	60.4%
Sumter	35.5	49.3%	625	80.7%
Terrell	40.9	46.9%	171	76.6%
Thomas	40.3	53.1%	1,113	82.6%
Tift	35.5	57.7%	1,022	81.8%
Turner	38.8	50.1%	151	82.4%
Worth	41.1	53.6%	255	81.3%

Within the 20 County region, Calhoun County and Clay County have employment rates with 29.9% and 35.6%, respectively. These are the lowest in the region. Additionally, these counties have two of the lowest total number of businesses for region. A low number of businesses can directly correlate to a low number of jobs offered within the county. Excluding Calhoun County and Clay County, the other declared counties have employment rates in the 40-50% range. Lee County (58.9%) and Tift County (57.7%) have the highest employment rates, but these rates are not noticeably higher than the others. Dougherty County (2,276) has the highest total number of businesses followed by Thomas County (1,113), Laurens County (1,049), and Tift County (1,022). The other 16 counties have a significantly lower number of businesses, and Baker County has the lowest at 25. For the more rural counties, the lower number of businesses may be indicative of a higher number of self-employed businesses such as farming.

The counties within the declared region have populations ranging from 74% to 90.6 with a high school degree or higher education. The average ages for the declared region ranges from 35.1 years to 47 years. The counties are similar in terms of average age, percent employed, and percent high school education.

County	% of Population over 65	% of Population with a Disability	% Minority
Baker	23.1%	22.1%	43.2%
Calhoun	14.5%	16.7%	66.1%
Clay	22.7%	20.7%	69.9%
Crisp	17.6%	17.9%	47.0%
Decatur	15.7%	17.1%	47.6%
Dougherty	14.6%	15.6%	73.0%
Early	18.6%	14.6%	54.2%
Grady	17.2%	20.8%	33.7%
Laurens	16.8%	13.4%	40.9%
Lee	11.9%	10.4%	25.9%
Miller	21.3%	13.0%	31.6%
Mitchell	15.7%	17.6%	50.5%
Randolph	21.2%	16.4%	64.8%
Seminole	22.1%	17.7%	38.2%
Sumter	15.9%	13.7%	57.4%
Terrell	18.3%	15.0%	63.2%
Thomas	17.2%	17.6%	39.9%
Tift	14.3%	15.0%	35.2%
Turner	18.0%	17.8%	45.1%
Worth	18.1%	17.5%	31.7%

According to the U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates, there is a vast difference in percentage of minority residents between the 20 declared counties. Lee County has the lowest minority concentration at 25.9%, while Dougherty County has the highest concentration at 73%. The areas with higher concentrations of minority residents may need greater access to funding opportunities in order to address disparities in housing needs and in access to opportunity. The Method of Distribution in Section 4 details the efforts DCA is undertaking to ensure the residents in need of funding receive funds.

The counties with the highest percentages of persons over 65 years are Baker County (23.1%), Clay County (22.7%), Seminole County (22.1%), Miller County (21.3%), and Randolph County (21.2%). An aging population could limit the resident's ability to perform work to repair their home after a disaster or travel to apply for FEMA or SBA assistance. Additionally, aging populations are more likely to be on a fixed income, making it hard to afford necessary repairs.

Demographic Background – MID Zip Code Analysis

The table below provides a demographic data of the three zip codes which make up the MID Area. The total population within each of the MID zip codes are very similar. Zip Code 31705 has a total population of 35,470, Zip Code 39817 has 10,624, and Zip Code 39845 has 7,949. There is an African American population of 74% within Zip Code 31705, 49% in Zip Code 39817, and 33% in Zip Code 39845. The Hispanic populations in Zip Codes 31705, 39817, and 39845 are 4%, 5%, and 4%, respectively. The percentage of households with individuals with person older than 55 years of age for Zip Codes 31705, 39817, and 39845 are 44%, 47%, and 56%, respectively. As will be further detailed in the Method of Distribution, an Infrastructure Program ~~as well as Small Business~~, Workforce, and Homeowner Rehabilitation and Reconstruction Program will be undertaken with CDBG-~~MITDR~~ funds. For the Infrastructure Program, local governments will submit applications for consideration of funding. A higher score will be given for projects located in areas with greater concentrations of minority, Hispanic, and low-to-moderate income persons.

Figure 14 | MID Zip Codes: Demographic Profile

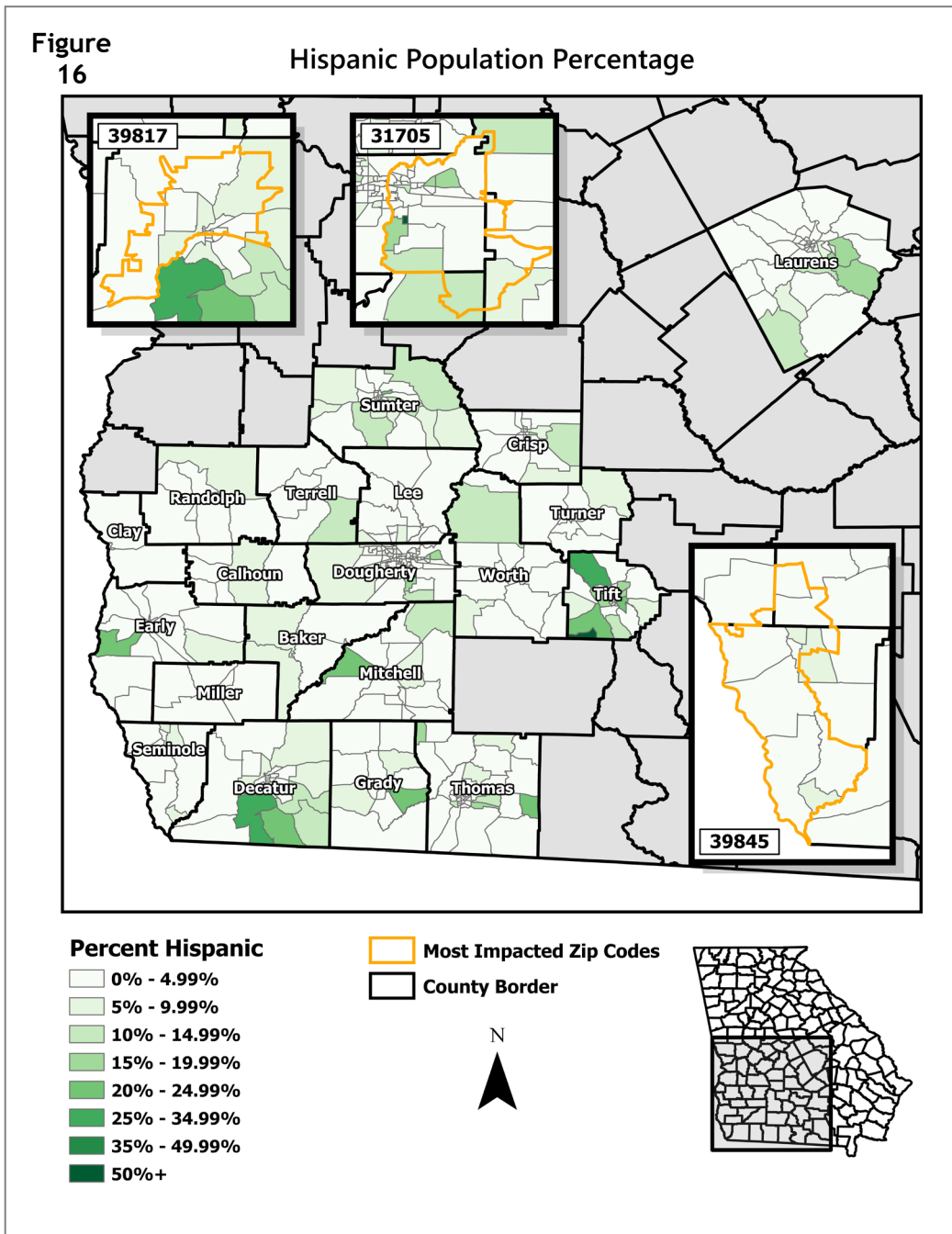
County	Zip Code	Total Population	# White	# African American	# All Other	# 2 or more races	# Hispanic	% Households w/ individuals 55+
Dougherty	31705	35,470	7,389	26,370	1,711	594	1,498	44%
Decatur	39817	10,624	4,959	5,163	502	209	545	46.6%
Seminole	39845	7,949	4,937	2,626	386	164	323	56.1%

Figure 15 | MID Zip Codes: Demographic Profile (Percentages)

Community	Zip Code	Total Population	# White	# African American	# All Other	# 2 or more races	# Hispanic	% Households w/ individuals 55+
Dougherty	31705	35,470	20.83%	74.34%	4.82%	1.67%	4.22%	44%
Decatur	39817	10,624	46.68%	48.60%	4.73%	1.97%	5.13%	46.6%
Seminole	39845	7,949	62.11%	33.04%	4.86%	2.06%	4.06%	56.1%

Hispanic Population

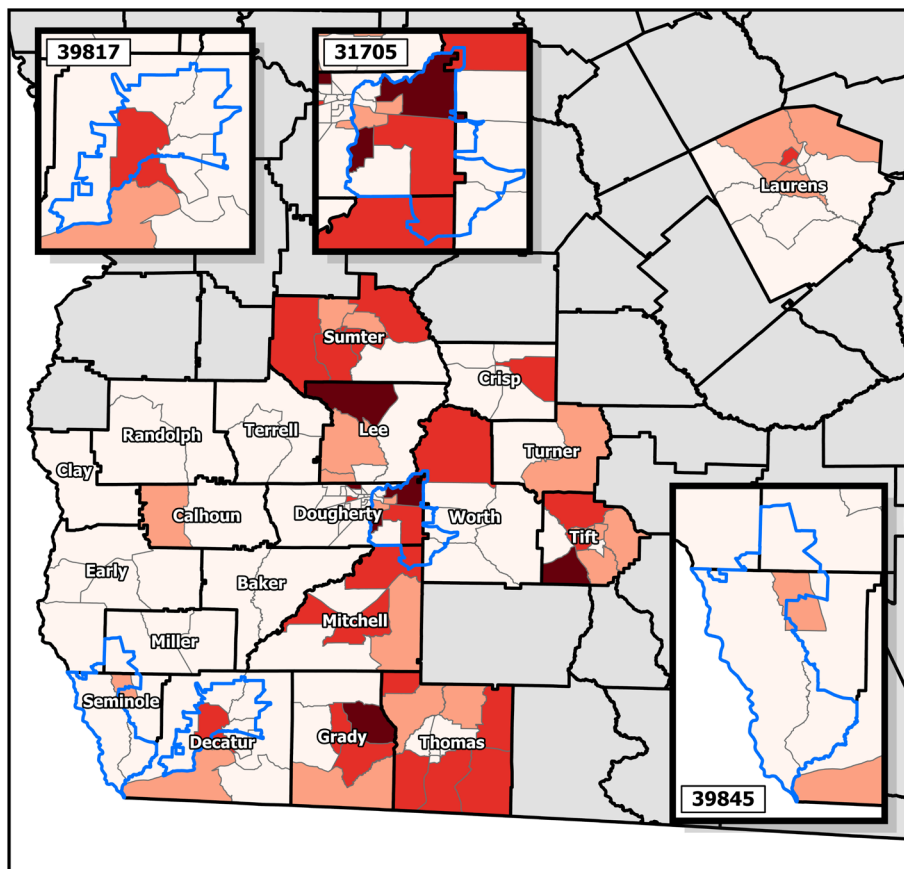
As seen in Figure 16, within the 20-county impacted area, Early County, Decatur County, Grady County, Mitchell County, Thomas County and Tift County have census tracts with Hispanic populations of 25 percent or greater. The United States Census Bureau defines "Hispanic or Latino" as "a person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin regardless of race. MID Zip Codes, 39817 and 39845 do not have high concentrations, while Zip Code 31705 has areas with a Hispanic population between 10 and 25 percent. In order to ensure Hispanic populations that only speak Spanish have access to information related to these funds, vital documents will be translated to Spanish. Further information related to documents translated into Spanish can be found in the Citizen Participation Plan located in Appendix A.



Limited English Proficiency

As seen in Figure 17, Dougherty County, Grady County, Lee County and Tift County all have a concentration of over five percent of limited English-speaking households. Specifically, nearly all of the census tracts in the MID Zip Code 31705 in Dougherty County have some level of limited English proficiency. MID Zip Code 39845 in Seminole County has a very low concentration of limited English speaking households. Baker County, Clay County, Early County, Miller County, Randolph County, Terrell County and Worth County have no areas with limited English proficiency according to census tract level data. In order for residents in the areas of limited English proficiency to have access to information related to these funds, vital documents will be translated to Spanish. Further information related to documents translated into Spanish can be found in the Citizen Participation Plan in Appendix A.

Figure 17 Percentage of Limited English-Speaking Households



Percent LEP

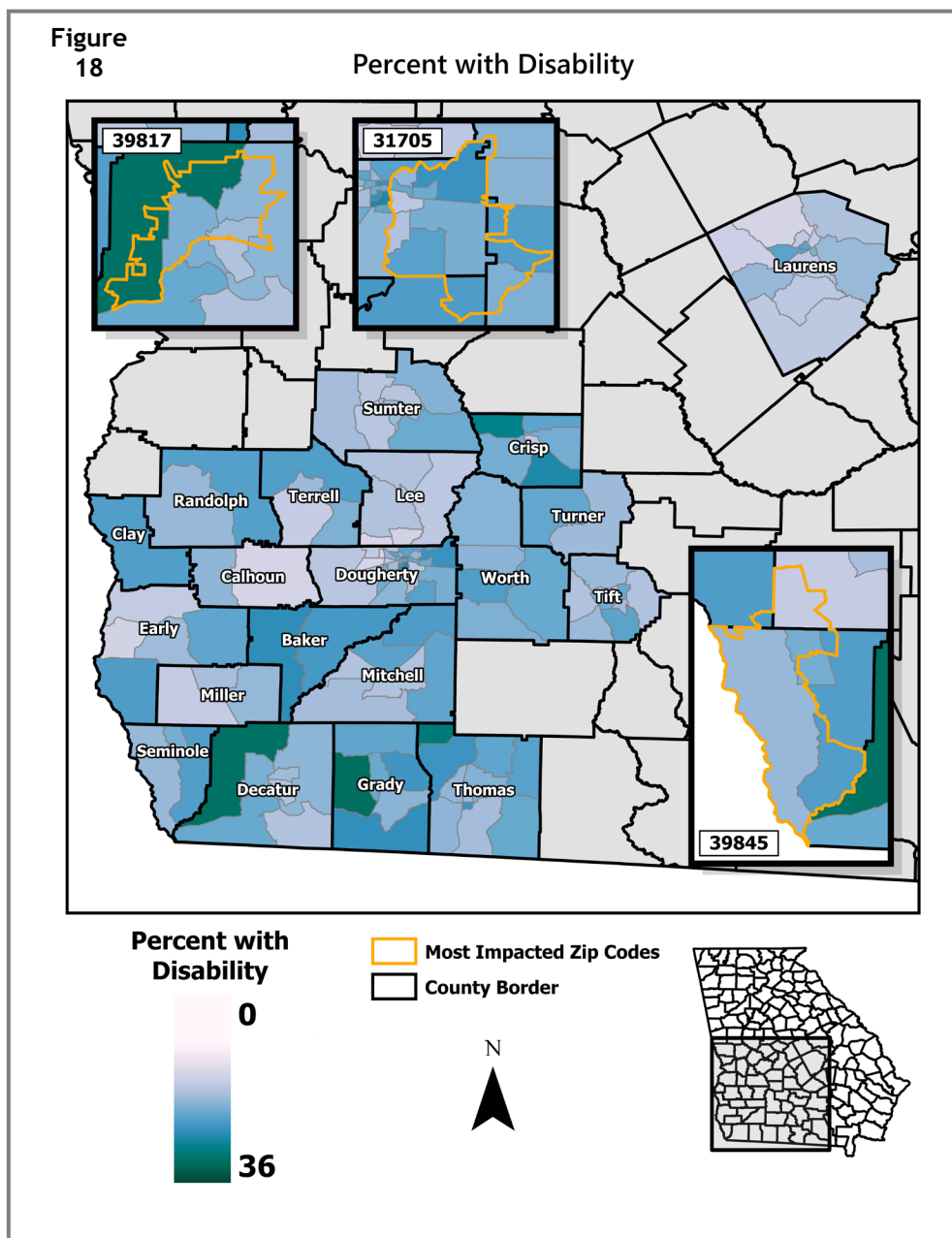
- 0%
- 0 - 1.99%
- 2% - 4.99%
- 5%+

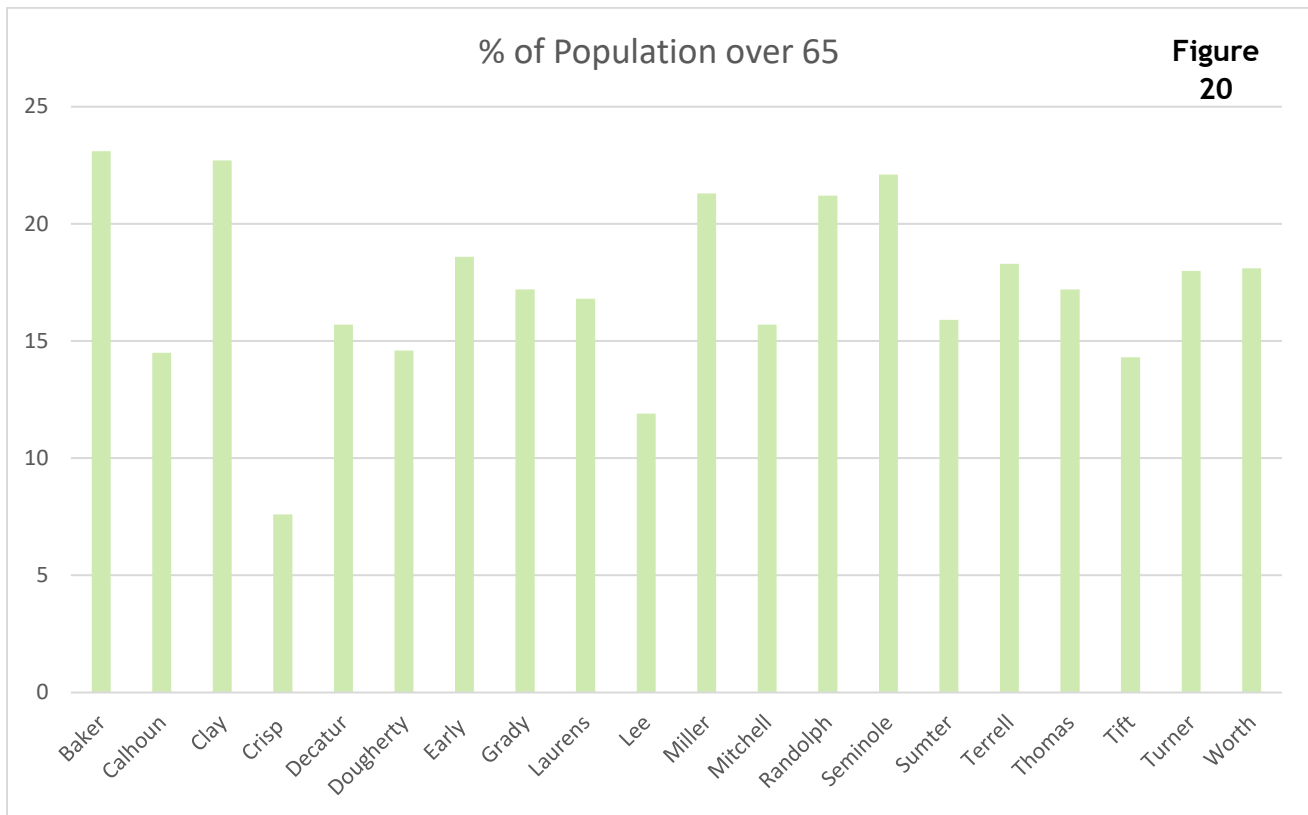
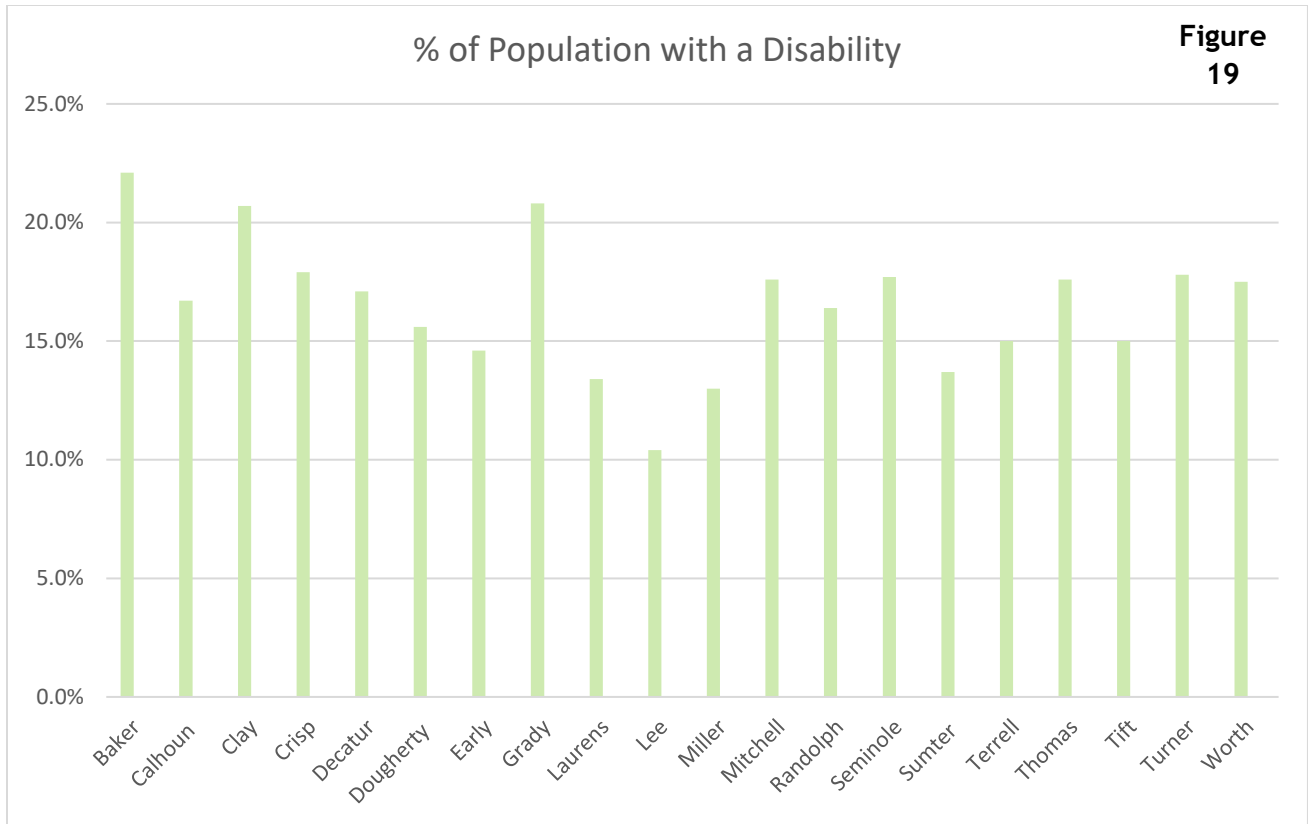
- Most Impacted Zip Codes
- County Border



Population with Disabilities

As seen in Figure 18, the greatest concentrations of persons with a disability are within Baker County (22.1%), Clay County (20.7%), and Grady County (20.8%). As analyzed on a Census Tract level, Decatur County has the largest concentration of persons with disabilities as compared to the twenty declared counties. Lee County and Miller County have a low percentage of disabilities county-wide. A majority of the presidentially declared counties have varying levels of percentages of persons with a disability. Crisp County, Decatur County Grady County and Thomas County have tracts with the highest percentage of disabilities. The census tracts within the HUD identified MID zip codes vary between higher and lower percentages of disabilities. The MID area portions of Decatur County seem to vary between higher and lower percentages of persons with a disability. Conversely, in the Seminole County MID zip code, 39845, there are lower concentrations of persons with a disability. The rural nature of the affected counties makes it increasingly difficult for disabled persons to access food, healthcare, and emergency services, such as FEMA or SBA. For this reason, these persons are considered vulnerable populations with higher risks and greater needs.





Housing Overview

The 20 declared county region contains approximately 200,000 homes varying by density, condition, year built, and owner/renter occupancy. Dougherty County has 40,637 housing units, the highest within the region. Laurens County and Thomas County rank second in the number of housing units with 21,497 and 20,615, respectively. Conversely, Baker County has 1,889 household units, the least within the region.

Figure 21: Age of Housing Stock: Percentage of Units by Year Built, by County (ACS 2013-2017)

County	Total Housing Units	Percentage of Units by Year Built									
		2014 or later	2010-2013	2000-2009	1990-1999	1980-1989	1970-1979	1960-1969	1950-1959	1940-1949	Pre 1939
Baker	1,889	1.3	0.2	15.1	22.3	18.0	11.8	18.3	6.4	1.5	5.1
Calhoun	2,402	0.2	1.0	8.0	18.5	11.5	20.7	12.8	9.2	8.2	9.8
Clay	1,977	0.0	0.3	12.7	27.6	14.2	18.0	7.4	3.9	3.1	12.8
Crisp	10,777	1.0	1.1	9.0	16.7	19.1	21.2	11.4	8.6	5.3	6.7
Decatur	12,204	1.7	2.5	11.3	22.8	15.2	19.4	7.8	6.8	3.8	8.5
Dougherty	40,637	0.4	1.6	12.7	10.6	14.8	21.9	16.0	13.1	5.7	3.1
Early	4,972	0.3	0.3	14.0	20.8	16.6	14.4	15.4	7.4	3.0	7.7
Grady	10,848	1.4	2.9	19.3	23.1	13.5	13.8	8.9	7.9	2.4	6.9
Laurens	21,497	1.0	1.1	15.6	21.1	18.2	15.2	11.1	7.2	4.2	5.3
Lee	11,058	1.8	3.4	25.2	33.7	15.4	11.5	5.0	1.8	0.6	1.6
Miller	2,766	1.4	3.7	12.3	15.3	17.8	16.2	11.6	12.0	2.9	7.0
Mitchell	9,047	0.7	3.3	8.9	25.2	14.3	14.5	14.2	9.0	3.6	6.3
Randolph	3,548	0.3	1.9	7.3	17.1	18.5	13.7	12.0	6.5	5.6	17.1
Seminole	4,834	0.0	1.8	17.1	15.2	20.0	19.0	15.1	5.2	2.5	4.1
Sumter	13,899	0.8	1.5	9.4	21.0	22.0	14.4	11.9	7.1	3.7	8.3
Terrell	4,173	0.6	1.2	8.4	16.7	17.1	16.4	10.1	6.8	3.5	19.3
Thomas	20,615	1.3	3.5	16.4	18.4	17.1	14.0	9.8	7.2	2.6	9.7
Tift	16,655	1.9	1.4	15.0	20.0	17.0	20.1	9.3	7.9	4.0	3.4
Turner	3,914	0.1	0.4	14.2	11.0	11.0	15.3	15.2	17.0	2.6	13.2
Worth	9,329	0.9	1.8	13.6	20.7	15.7	17.3	10.5	4.4	5.5	9.7

As shown in Figure 21, very few houses have been built within this decade. Lee County (5.2%) and Miller (5.1%) County have the highest percentage of new housing units built between 2010 and 2014. Figure 21 shows most of the housing stock was built between 1960 and 2009. Houses that are in the 30-60-year range of age are likely to be less resilient due to aging materials and the less stringent building codes in place at the time of construction. Also, residences where critical systems such as the roof have not been maintained are of higher risk of sustaining damage during a disaster.

Of the declared counties, four have more than 10% of their houses built before 1939, which means they are greater than 81 years old. Of the housing units in Terrell County, 19.3% were built before 1939. Similarly, in Randolph County 17.1% of the housing units were built before 1939.

County	Total housing units	Occupied housing units	%	Vacant housing units	%
Baker	1,889	1,385	73.3	504	26.7
Calhoun	2,402	1,853	77.1	549	22.9
Clay	1,977	1,202	60.8	775	39.2
Crisp	10,777	8,329	77.3	2,448	22.7
Decatur	12,204	10,153	83.2	2,051	16.8
Dougherty	40,637	34,780	85.6	5,857	14.4
Early	4,972	4,082	82.1	890	17.9
Grady	10,848	9,037	83.3	1,811	16.7
Laurens	21,497	17,183	79.9	4,314	20.1
Lee	11,058	10,354	93.6	704	6.4
Miller	2,766	2,300	83.2	466	16.8
Mitchell	9,047	7,889	87.2	1,158	12.8
Randolph	3,548	2,616	73.7	932	26.3
Seminole	4,834	3,325	68.8	1,509	31.2
Sumter	13,899	11,758	84.6	2,141	15.4
Terrell	4,173	3,247	77.8	926	22.2
Thomas	20,615	17,352	84.2	3,263	15.8
Tift	16,655	15,058	90.4	1,597	9.6
Turner	3,914	3,023	77.2	891	22.8
Worth	9,329	8,038	86.2	1,291	13.8

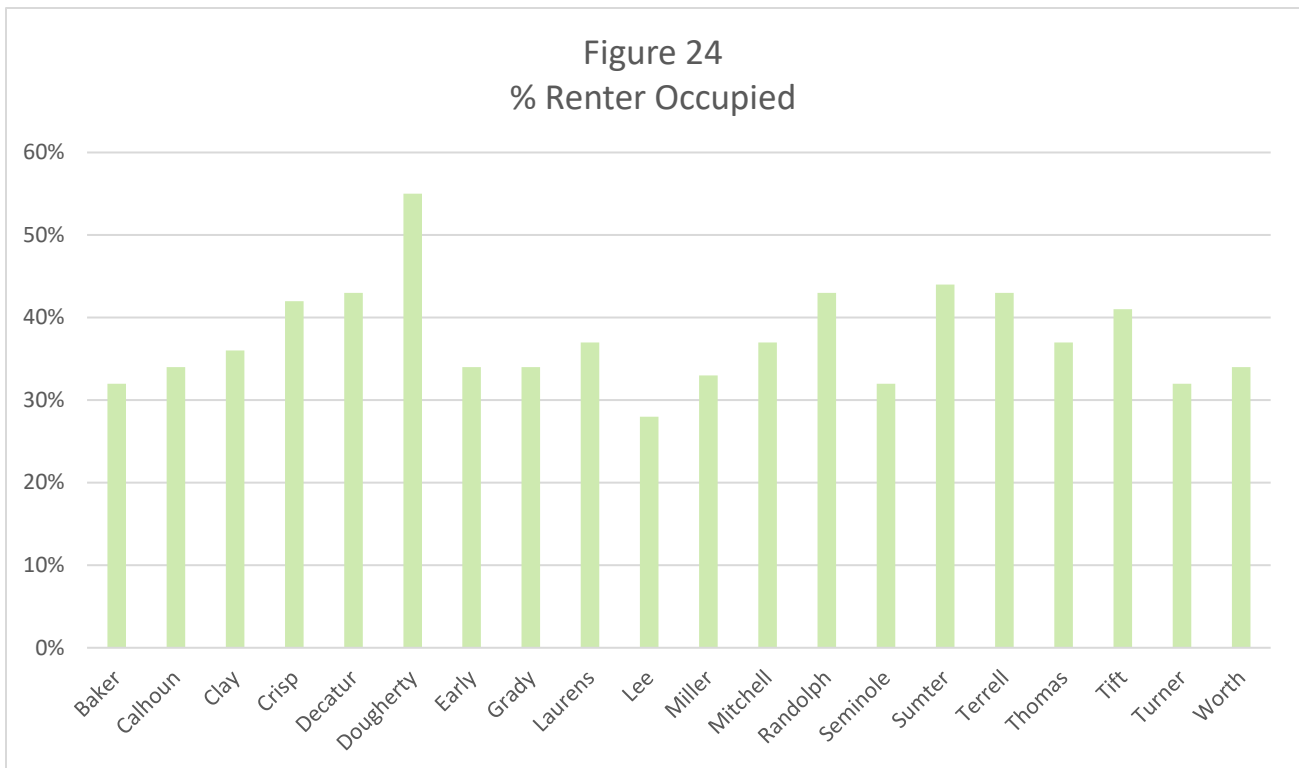
As shown in Figure 22, all 20 of the declared counties have greater than 60% occupied housing units. Occupied homes are more likely to be maintained than those that are unoccupied. Homes that are not maintained contribute to blight and increased safety hazards. However, in counties with low percentages of vacant homes, there may be a lack of available housing for those displaced by disaster.

Figure 23: Housing Units by County

County	# of Renters	% of Renters
Baker	604	32%
Calhoun	817	34%
Clay	712	36%
Crisp	4,526	42%
Decatur	5,248	43%
Dougherty	22,350	55%
Early	1,690	34%
Grady	3,688	34%
Laurens	7,947	37%
Lee	3,096	28%
Miller	913	33%
Mitchell	3,347	37%
Randolph	1,526	43%
Seminole	1,547	32%
Sumter	6,116	44%
Terrell	1,794	43%
Thomas	7,628	37%
Tift	6,829	41%
Turner	1,252	32%
Worth	3,172	34%

Lee County and Tift County have the highest occupancy rates at over 90%, and 11 counties have an occupancy rate over 80%. In Seminole County, a community significantly impacted by Hurricane Michael, has a 31.2% vacancy rate. Areas with higher vacancy rates may experience delays in recovery since there is not a tenant championing the repair process. DCA’s DR team recently drove through affected areas in Seminole County. As indicated by the blue tarps on roofs, projects are still being completed even one and a half years after the storm.

Figure 23 shows the number of renters and percentage of rental households by county. Figure 24 shows the percentage of units listed as rentals by county in relation to the other declared counties. Dougherty County has the highest percentage of rental units at 55%, while Lee County has the lowest percentage of rental units at 28%. Seven out of twenty counties have more than 40% rental units of their housing stock.



Disaster Impact on Homeless Populations

Homelessness across Hurricane Michael-impacted counties is among the lowest in the state (Figure 25). Data from the State of Georgia's Point-in-Time Homeless Count, collected in January 2017 and January 2019, shows that homelessness in the affected areas represents a small fraction of the total number of homeless persons in Georgia. The Point-in-Time Count is conducted every two years. The total number of homeless persons in the 20 county area in 2017 was 184 and 340 in 2019. The percentage of homeless in the 20 county area was two percent in 2017 and eight percent in 2019 when compared to the State of Georgia. However, the total number of beds available at the time of this survey was 207 in the area.

County	2017 UHP	2017 SHP	2017 Total Homeless	2019 UHP	2019 SHP	2019 Total Homeless	2019 .Available Beds	Change from 2017 to 2019 (Total)
Baker	0	0	0	0	0	0	0	0
Calhoun	0	0	0	0	0	0	0	0
Clay	1	0	1	0	0	0	0	-1
Crisp	8	0	8	1	0	1	0	-7
Decatur	4	0	4	5	0	5	0	1
Dougherty	20	40	60	94	50	144	88	84
Early	0	0	0	4	0	4	0	4
Grady	0	0	0	7	0	7	0	7
Laurens	17	23	40	19	17	36	33	-4
Lee	0	0	0	4	0	4	0	4
Miller	0	0	0	0	0	0	0	0
Mitchell	1	0	1	4	0	4	0	3
Randolph	3	0	3	0	0	0	0	-3
Seminole	0	0	0	0	0	0	0	0
Sumter	11	0	11	12	0	12	0	1
Terrell	0	0	0	0	0	0	0	0
Thomas	10	20	30	64	16	80	23	50
Tift	0	26	26	0	37	37	63	11
Turner	0	0	0	0	0	0	0	0
Worth	0	0	0	6	0	6	0	6
20-County Total	75	109	184	220	120	340	207	-
State Total	3,692	6,681	10,373	2,262	1,921	4,183	2,507	-

*UHP – Unsheltered Homeless Persons SHP – Sheltered Homeless Persons

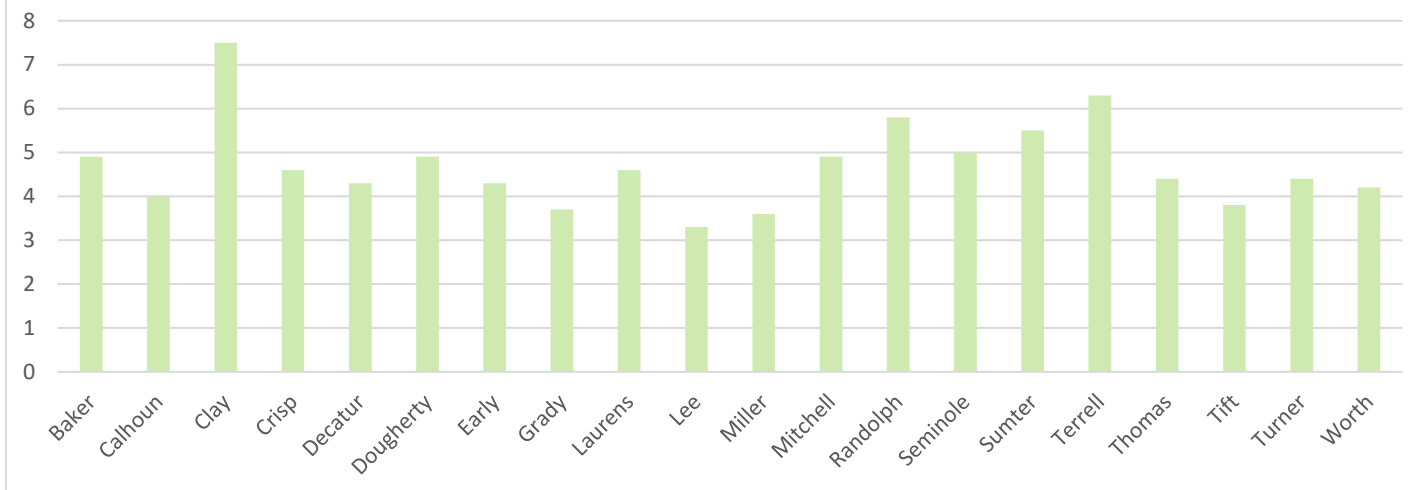
Assistance to people experiencing homelessness is provided through Georgia's Continuum of Care (CoC) network. There are eight CoC's in the state that serve local areas. The Southwest Georgia Community Action Council, Inc. serves 16 of the 20 counties within the affected area. The Council serves the following counties: Baker, Calhoun, Clay, Colquitt, Decatur, Dougherty, Early, Grady, Lee, Marion, Miller, Mitchell, Quitman, Randolph, Schley, Seminole, Sumter, Terrell, Thomas, Webster, and Worth. The Council's Emergency Services Program provides assistance with payment of rent, mortgage, utility bills, and deposits; purchase of food; and provision of shelter in situations that prevent cut-offs, minimize malnutrition, circumvent incidents of eviction, and re-house homeless families. Additional programs are also working to improve the conditions related to homeless persons. These programs are: Rapid Re-Housing program funded through Georgia's Emergency Solutions Grants and The Georgia Housing Finance Authority's Permanent Supportive Housing (PSH) Program.

Unemployment Overview

Figure 26: Unemployment by County

County	Aug 2018	Sept 2018	Oct 2018	Nov 2018	Dec 2018	Jan 2019	Feb 2019	Mar 2019	Apr 2019	May 2019	Jun 2019	Jul 2019	Aug 2019	County Avg.
Baker	5.5	4.6	5.0	4.3	5.1	6.0	5.0	4.3	4.2	4.7	5.0	5.3	4.6	4.9
Calhoun	4.5	4.1	4.1	3.5	3.9	4.3	4.2	4.0	3.6	3.7	4.1	4.4	3.9	4.0
Clay	7.7	7.1	7.5	6.8	7.7	8.9	7.9	6.6	6.1	7.3	7.8	8.2	7.9	7.5
Crisp	4.6	4.1	4.5	8.3	4.3	5.3	4.6	4.3	3.9	3.9	4.3	4.1	4.2	4.6
Decatur	4.8	4.2	4.3	4.1	4.2	5.1	4.3	4.0	3.8	4.1	4.4	4.0	4.2	4.3
Dougherty	5.3	4.6	4.8	4.7	4.9	5.8	5.1	4.8	4.1	4.6	5.2	4.9	4.9	4.9
Early	4.7	4.0	4.1	4.4	4.4	5.2	4.5	4.2	3.5	3.8	4.5	4.1	4.2	4.3
Grady	4.0	3.5	3.8	3.3	3.6	4.2	3.8	3.6	3.0	3.4	3.9	3.8	3.9	3.7
Laurens	4.9	4.2	4.3	4.0	4.4	5.4	4.6	4.4	4.0	4.4	5.0	5.7	5.1	4.6
Lee	3.8	3.3	3.5	3.1	3.3	4.0	3.5	3.2	2.8	3.0	3.5	3.2	3.3	3.3
Miller	3.5	3.3	3.5	3.6	3.7	4.0	3.7	3.4	3.0	3.3	4.1	3.5	3.8	3.6
Mitchell	5.8	5.0	5.0	4.5	5.0	5.6	4.9	4.8	3.9	4.4	5.1	5.2	5.0	4.9
Randolph	6.9	6.0	5.8	5.4	5.9	7.1	6.0	5.2	4.5	5.0	5.8	5.9	5.3	5.8
Seminole	5.6	4.7	5.2	4.8	4.8	5.7	5.1	4.9	4.2	4.7	5.2	4.7	4.9	5.0
Sumter	5.9	5.3	5.7	6.9	5.6	6.3	5.7	5.2	4.4	5.0	5.4	5.4	5.2	5.5
Terrell	7.9	7.0	6.9	8.2	6.8	7.4	6.1	5.5	4.8	5.2	5.6	5.8	4.9	6.3
Thomas	4.7	4.2	4.6	4.1	4.5	5.2	4.5	4.2	3.6	3.9	4.4	4.4	4.4	4.4
Tift	4.2	3.6	3.8	3.5	3.8	4.7	4.1	3.8	3.0	3.3	3.7	3.7	3.6	3.8
Turner	5.5	4.4	4.4	4.6	4.5	5.0	4.6	4.1	3.5	4.3	4.2	3.8	4	4.4
Worth	4.6	4.1	4.3	4	4.2	5.6	4.3	3.9	3.3	4.1	4.1	3.8	4.1	4.2
State Avg.	4.1	3.6	3.8	3.5	3.8	4.2	3.8	3.6	3.1	3.3	3.8	3.8	3.7	3.7

Figure 27
Avg. Unemployment Rates Aug. 2018- Aug. 2019

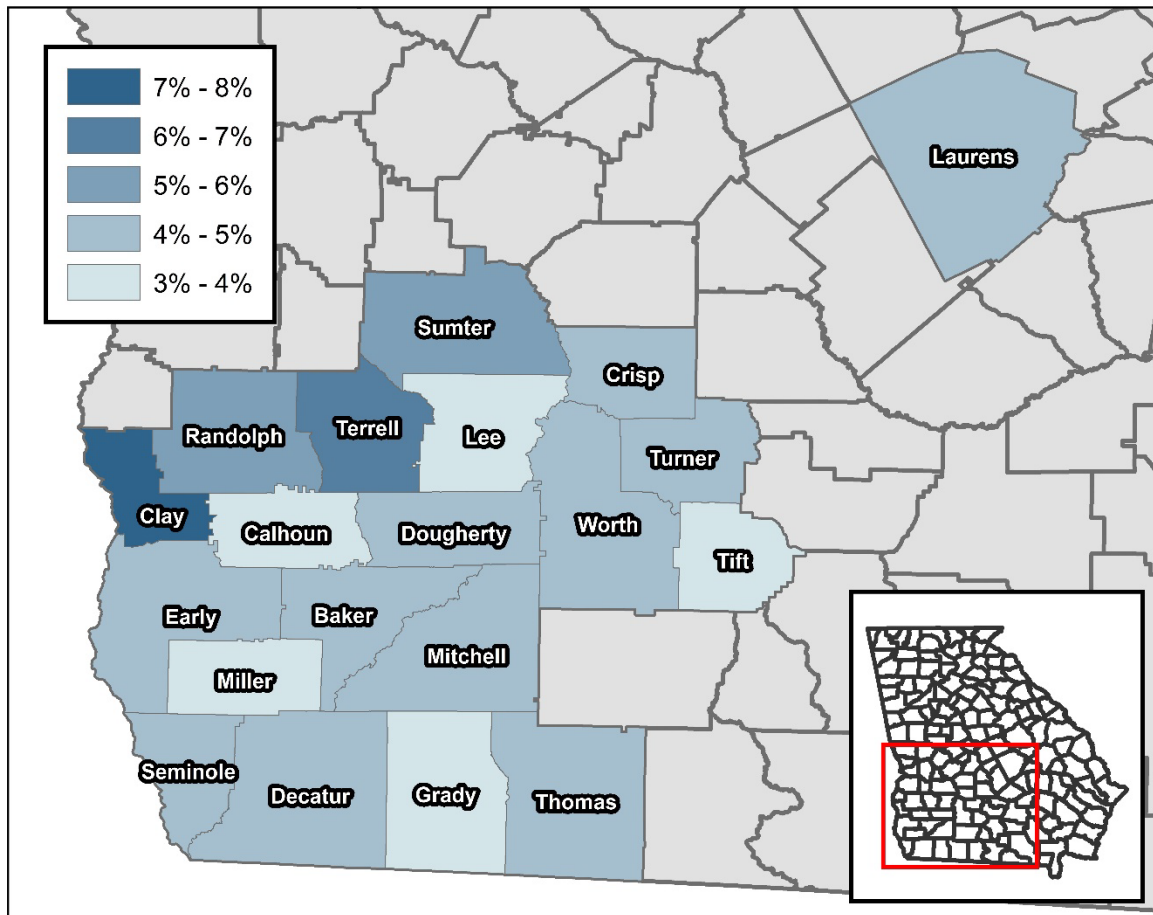


Between August 2018 and August 2019, 18 of the 20 counties declared eligible for FEMA’s Individual and Public Assistance had an equal to or higher rate of unemployment than the state average. Figures 26 and 27 list unemployment percentages each month as well as an average from August 2018 to August 2019. The percentages in green in Figure 26 illustrate the month with the highest rate of unemployment for each county. Crisp County, Sumter County, and Terrell County experienced their highest rates of unemployment in November 2018 immediately following Hurricane Michael occurring in October 2018. All of the counties within the affected area, with the exception of Lee County and Grady County, had an unemployment rate equal to or higher than the state average in November 2018. The unemployment rates in Crisp County and Terrell County were double the state average.

Zip Code 39845 (Seminole County), a HUD identified Most Impacted and Distressed area, had a higher unemployment rate than the state every month within this period. Clay County continually had a high rate of unemployment throughout the year. Generally, areas with higher unemployment rates are less likely to have the necessary resources to recover quickly after a major disaster. These high unemployment rates, combined with other factors, have led to an increased amount of unmet needs stemming from Hurricane Michael.

Figure 28

Average Unemployment Percent of IA and PA Counties 8/1/2018 - 8/1/2019, DR-4400



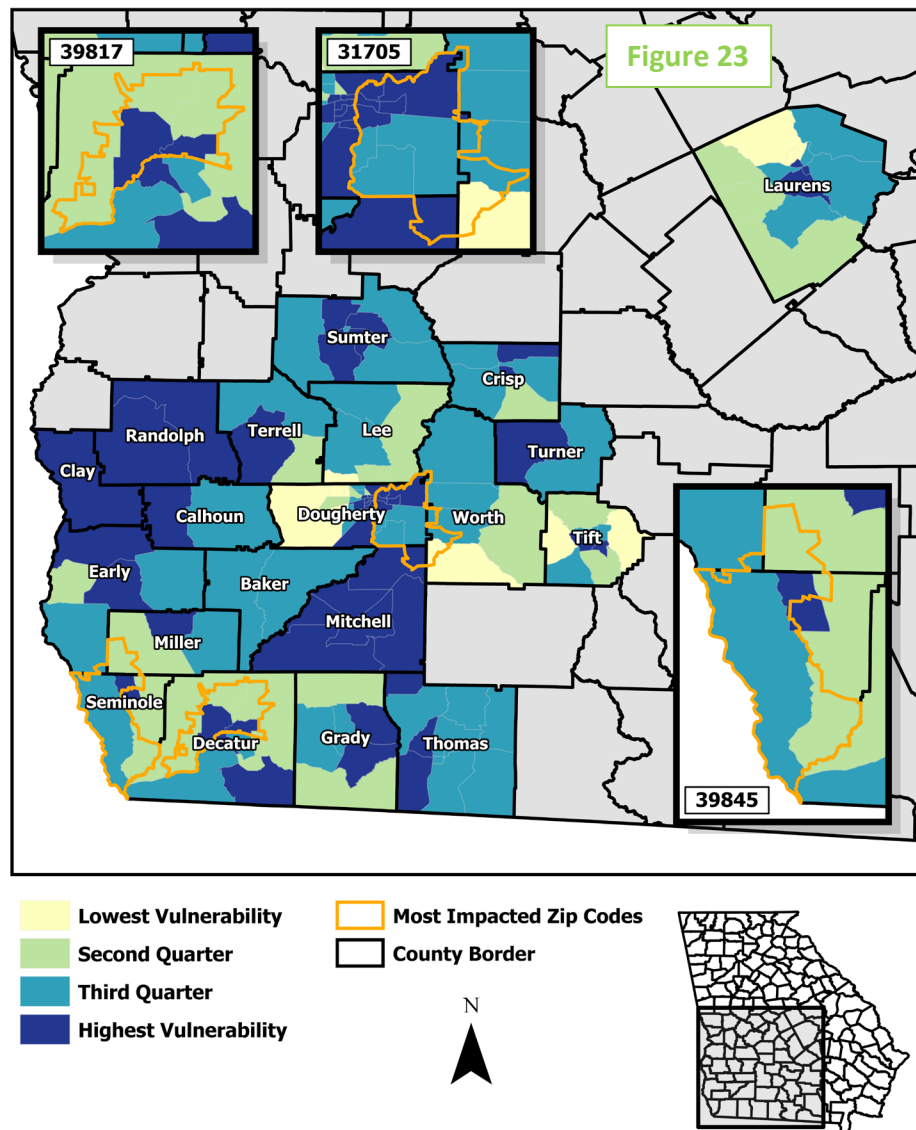
Social Vulnerability

The Social Vulnerability Index (SVI), created by the Centers for Disease Control (CDC), is a visual tool used to compare the resiliency of communities. The SVI uses U.S. Census Data to determine social vulnerability by individual census tracts. Each tract is ranked on 15 social factors including poverty, lack of vehicle access, and percent of population without access to a hospital. According to the CDC, social vulnerabilities may weaken a community's ability to prevent human suffering and financial loss in a disaster. As seen in Figure 23, the higher the score, the more socially vulnerable a community is. Clay County and Mitchell County have the highest level of vulnerability countywide. Calhoun County, Clay County, Early County, Randolph County and Terrell County have their entire county in the top 50% for social vulnerability. Dougherty County, Laurens County, and Tift County are the only counties that have areas classified with the lowest vulnerability. Although Dougherty County contains some areas that are less socially vulnerable, the densest part of the county is located within the area of higher social vulnerability.

Conversely, Lee County is the only county that has no areas that rank in the highest vulnerability category.

Every county and MID Zip Code are in need of access to CDBG-DR funding. Because of this, the three MID zip codes will have access to 80% of the CDBG-DR funding and the remaining 20 counties may have access to the remaining 20%. DCA has proposed four programs that will have benefits to socially vulnerable persons. Further information regarding the distribution of funds can be found in the Method of Distribution Section.

Social Vulnerability for 20 IA and PA Declared Counties



Needs Survey

In January 2020, DCA’s Regional Representatives conducted a survey within the south and southwestern portion of the state. The survey received 49 responses within the 20-county area. The first question of the survey read: “What are the most pressing issues affecting your community? Please rank in order of importance 1 being the most important and 8 being the least important.” A high concentration of communities ranked workforce development and housing as the most pressing issues. As seen in Figure 29, 35% of the respondents ranked workforce development as the top pressing issue, while 22% chose housing as rank number one. On the contrary, a majority of the respondents recorded broadband access as the least pressing issue in their community. Figure 30 shows the summary of the eighth-ranking responses. Importantly, no respondents ranked workforce development as the eighth priority and only one community ranked “access to state and federal development funds” as the eighth priority. Figure 31 displays the weighted averages of all responses ranked one through eight. For this ranking question, DCA assigned a higher number for lower ranks and lower numbers for the higher ranks. Workforce development and housing scored the highest.

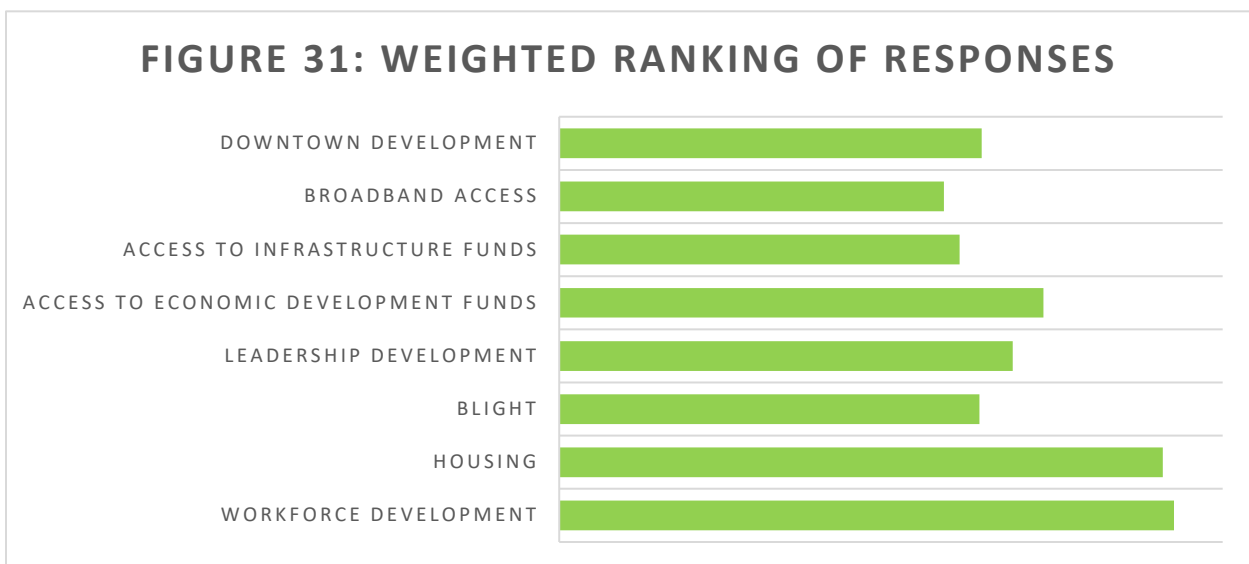
Question two of the survey read: “Is there another topic that is more important to your community that is not listed above?” In sum, these responses included public transportation, poverty, education, employment opportunities, and trade schools for the workforce.

Figure 29: Survey Response Question 1

Category	Responses Rank 1	Percent
Workforce Development	17	34.69%
Housing	11	22.45%
Blight	8	16.33%
Leadership Development	6	12.24%
Access to State & Fed Econ Dev Funds	2	4.08%
Access to Infrastructure Funds	2	4.08%
Broadband Access	2	4.08%
Downtown Development	1	2.04%

Figure 30: Survey Response Question 8

Category	Responses Rank 8	Percent
Broadband Access	15	32.61%
Blight	12	26.09%
Access to Infrastructure Funds	9	19.57%
Downtown Development	4	8.70%
Leadership Development	3	6.52%
Housing	2	4.35%
Access to State & Fed Econ Dev Funds	1	2.17%
Workforce Development	0	0.00%



3. Impact and Unmet Needs

Disaster Impact

This section details the overall impact of Hurricane Michael on the 20 counties declared eligible for FEMA's Individual and Public Assistance and the unmet needs that still exist within these communities. This section seeks to evaluate the three core aspects of recovery – housing, infrastructure (including public facilities and services), and economic development. Remaining unmet need will be calculated by using the most recent available data. The data provided in this section will inform the Method of Distribution in Section 4.

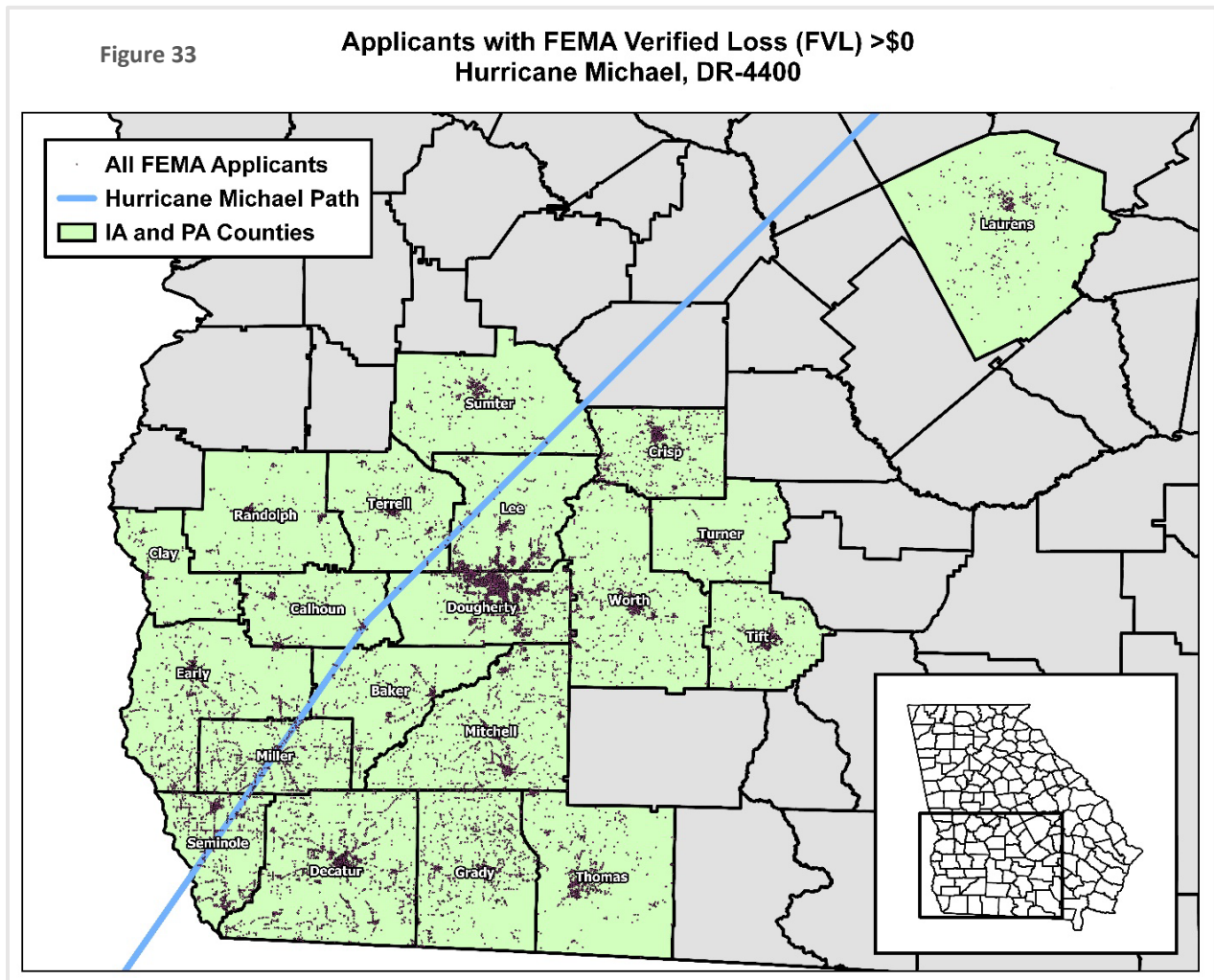
Housing - FEMA Individual Assistance Data

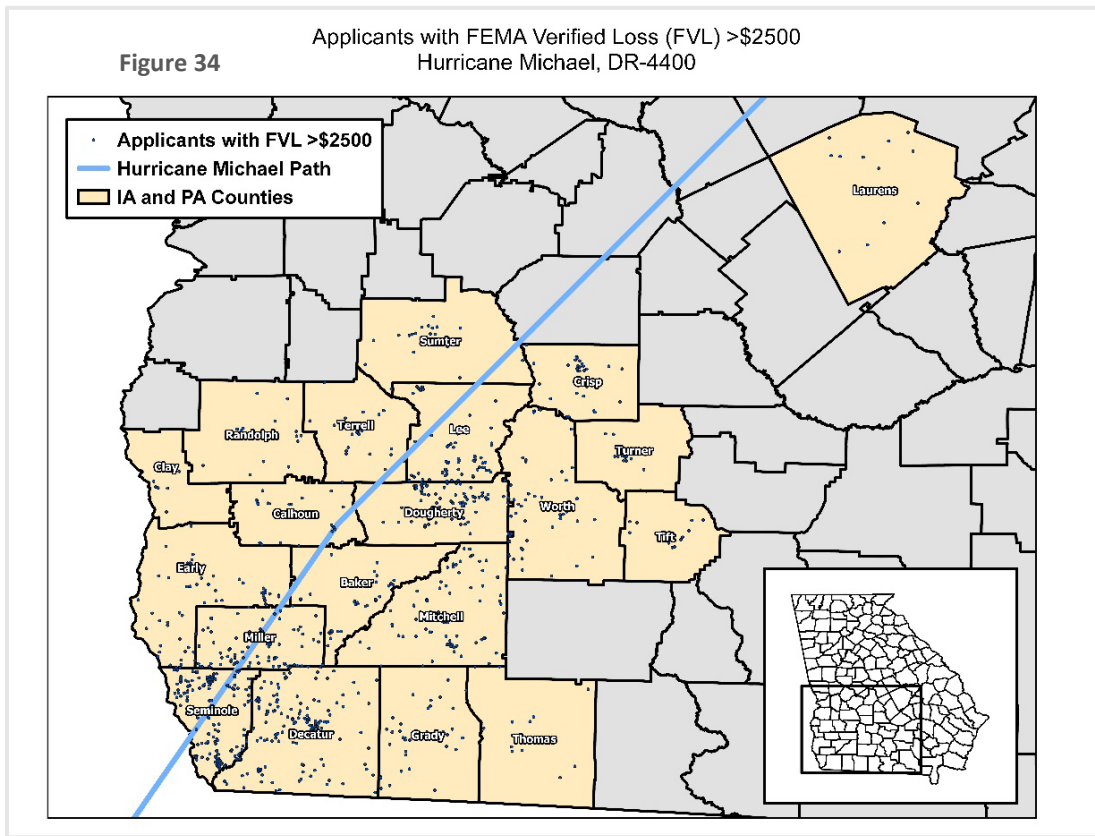
DCA analyzed several sets of data in order to gauge the housing impact caused by Hurricane Michael. These sets include data from FEMA and SBA home loan data. The total number of FEMA applicants within the presidentially declared area is 40,683. Of those, 11,613 had FEMA Verified Losses (FVL). Data in Table 32 shows the FVL determinations in the disaster-impacted counties. Seminole County experienced \$3,442,112 in FEMA Verified Losses, the highest in the 20 county declared area. Dougherty County and Decatur County ranked second and third with losses totaling \$2,714,006 and \$2,627,371, respectively. The total FEMA Verified Losses for the disaster is \$20,698,938. On average, applicants from Seminole County and Clay County had the highest FVL amounts. The average FVL amounts were derived by dividing the number of applicants with FVL and the FVL dollars for each county.

County	# Applicants	Applicants with FVL	FVL Dollars	Average FVL Dollars
Seminole	2,764	1091	\$ 3,442,112.39	\$ 3,155.01
Dougherty	10,016	1447	\$ 2,714,006.16	\$ 1,875.61
Decatur	5,128	1469	\$ 2,627,371.25	\$ 1,788.54
Miller	1,711	588	\$ 1,682,833.42	\$ 2,861.96
Early	2,261	787	\$ 1,432,994.34	\$ 1,820.83
Mitchell	3,082	1128	\$ 1,382,434.00	\$ 1,225.56
Worth	1,594	595	\$ 1,142,746.57	\$ 1,920.58
Lee	2,099	479	\$ 1,034,047.49	\$ 2,158.76
Grady	1,963	523	\$ 671,398.59	\$ 1,283.74
Crisp	1,868	513	\$ 615,456.03	\$ 1,199.72
Clay	367	195	\$ 574,499.58	\$ 2,946.15
Baker	765	290	\$ 484,022.06	\$ 1,669.04

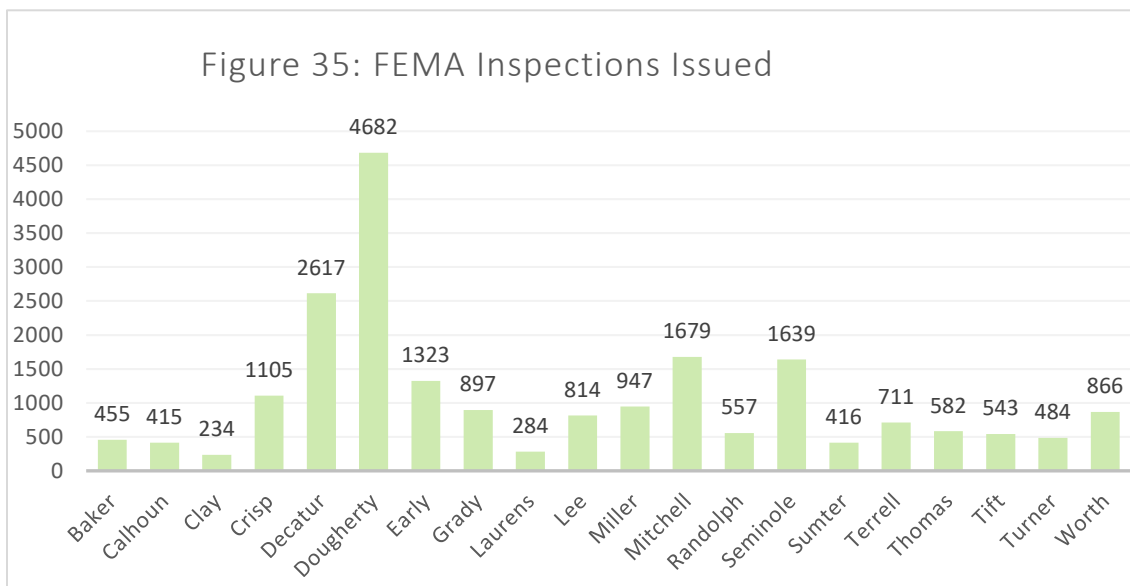
Randolph	858	393	\$ 478,639.01	\$ 1,217.91
Terrell	1,251	359	\$ 459,388.68	\$ 1,279.63
Laurens	478	191	\$ 409,177.68	\$ 2,142.29
Calhoun	766	345	\$ 376,511.55	\$ 1,091.34
Turner	742	352	\$ 311,332.71	\$ 884.47
Thomas	1,255	249	\$ 302,591.95	\$ 1,215.23
Tift	967	324	\$ 289,430.78	\$ 893.30
Sumter	748	295	\$ 267,943.76	\$ 908.28
Total	40,683	11,613	\$20,698,938.00	-

Figures 33 and 34 show the density of applicants with FEMA Verified Losses. Figure 33 illustrates the losses above \$0 and Figure 34 shows losses above \$2,500. In Figure 28, there is a high density of applicants, but concentrations can be seen in each county. Dougherty County has one of the most pronounced densities. There is a dramatic change in density between Figure 33 and Figure 34 suggesting a large portion of applicants had fewer than \$2,500 in FVL.



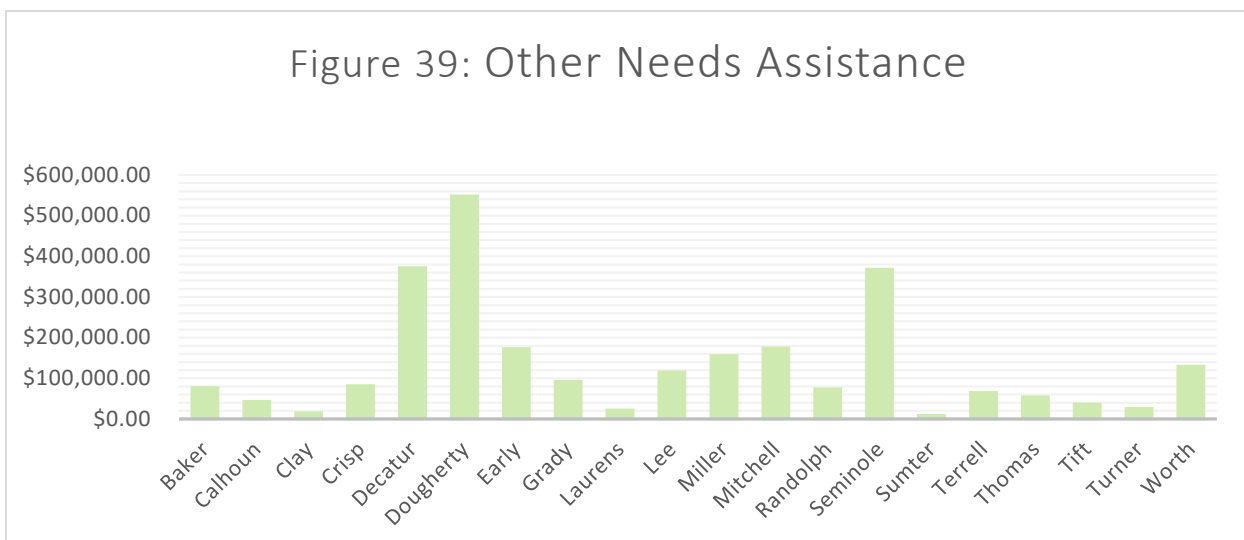
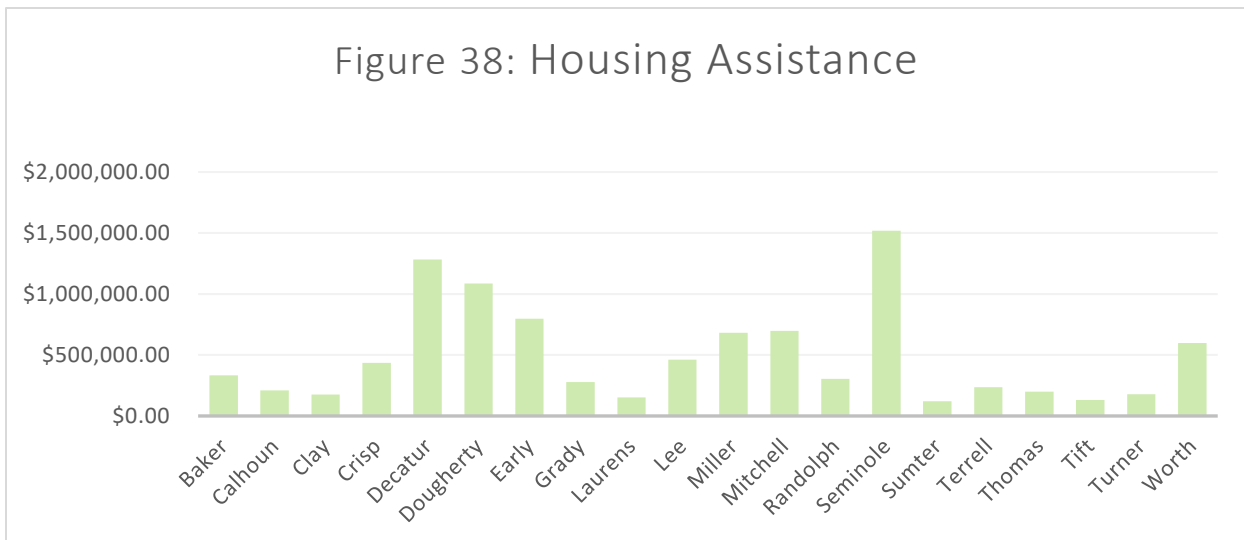
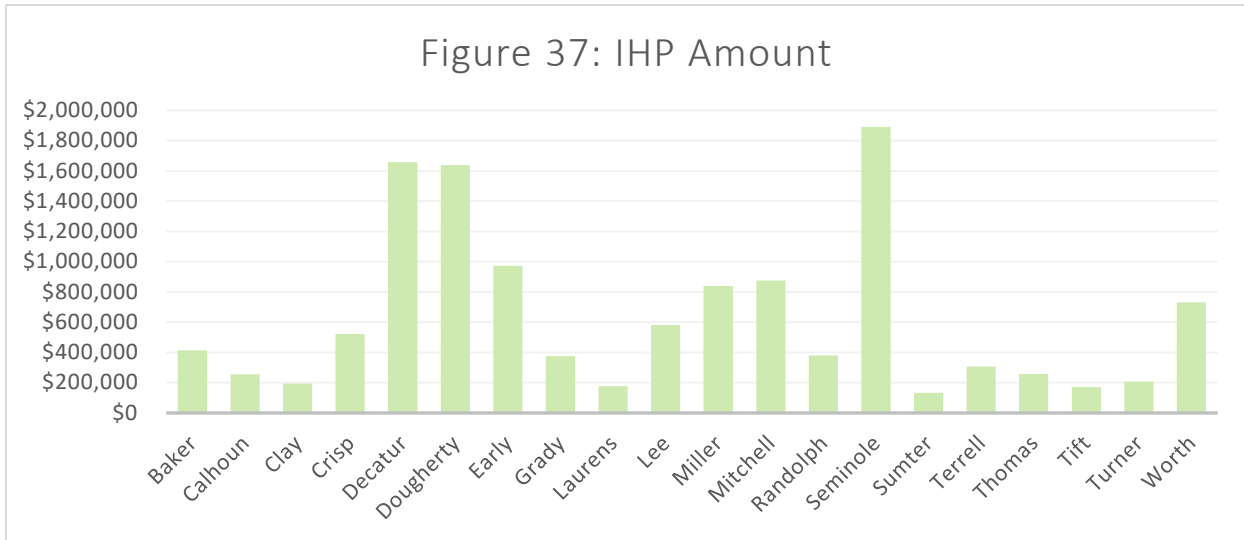


FEMA's standard loss verification method for initial eligibility determination is an onsite inspection by a FEMA inspector. These inspections are an essential part of the recovery process; the results from these inspections will determine eligibility and the amount of award for the FEMA applicant. In Dougherty County 4,682 inspections were conducted making this the county with the most inspections during this disaster. Next, 2,617 inspections were conducted in Decatur County. Mitchell County and Seminole County had a similar amount of inspections with 1,679 and 1,639, respectively. Even though Seminole County had fewer inspections, the FVL losses were considerably higher than the other 19 counties.



The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. The Individual and Household Program (IHP) data is broken down into two categories, Housing Assistance (HA) and Other Needs Assistance (ON). Housing funds, made available through the Housing Assistance program help to bridge the gap from sheltering to permanent housing. These funds are for limited basic home repairs and replacement of essential household items, as well as rental payments for temporary housing. This assistance brings residences back to a basic level of “safe and sanitary living or functioning condition,” and may not account for the full extent of the home’s damage or need. DCA obtained Individual Assistance data from FEMA and the data is current as of April 10, 2020. The data shows Seminole County, Decatur County, and Dougherty County as having the greatest amounts of IHP, HA, and ON assistance. Overall, throughout the 20-county region, the total amount of IHP assistance dispersed is \$12,581,999.88. Of that, \$9,877,847.92 was dispersed for housing assistance and \$2,704,151.96 for other needs.

Figure 36: FEMA Assistance			
County	IHP Amount	HA	ON
Seminole	\$ 1,890,068.97	\$ 1,518,411.14	\$ 371,657.83
Decatur	\$ 1,658,267.09	\$ 1,282,581.07	\$ 375,686.02
Dougherty	\$ 1,638,127.55	\$ 1,086,450.72	\$ 551,676.83
Early	\$ 973,225.44	\$ 796,805.22	\$ 176,420.22
Mitchell	\$ 874,577.33	\$ 696,599.97	\$ 177,977.36
Miller	\$ 840,256.75	\$ 680,684.19	\$ 159,572.56
Worth	\$ 731,684.92	\$ 598,269.88	\$ 133,415.04
Lee	\$ 581,837.98	\$ 462,797.53	\$ 119,040.45
Crisp	\$ 521,759.25	\$ 436,587.63	\$ 85,171.62
Baker	\$ 413,717.58	\$ 333,431.43	\$ 80,286.15
Randolph	\$ 380,708.19	\$ 303,476.56	\$ 77,231.63
Grady	\$ 375,465.00	\$ 278,808.19	\$ 96,656.81
Terrell	\$ 305,613.60	\$ 237,100.20	\$ 68,513.40
Thomas	\$ 256,871.68	\$ 198,737.50	\$ 58,134.18
Calhoun	\$ 255,383.06	\$ 208,994.45	\$ 46,388.61
Turner	\$ 207,370.95	\$ 177,745.42	\$ 29,625.53
Clay	\$ 195,033.65	\$ 176,642.91	\$ 18,390.74
Laurens	\$ 176,962.35	\$ 151,116.70	\$ 25,845.65
Tift	\$ 171,429.72	\$ 131,264.18	\$ 40,165.54
Sumter	\$ 133,638.82	\$ 121,343.03	\$ 12,295.79
Total	\$ 12,581,999.88	\$ 9,877,847.92	\$ 2,704,151.96



Impact by Housing Ownership Status

Of the 40,683 FEMA applicants, 26,856 were homeowners, 13,577 were renters, and 250 did not disclose this information. This information shows a greater impact to those owning homes rather than renting. While performing inspections, FEMA documents when residences are destroyed. According to data provided by FEMA in Figure 33, 82 homeowner residences and 39 rental units were destroyed. Of these, the largest concentrations were in Seminole County. Conversely, Baker County, Lee County, Randolph County, Sumter County, and Turner County no residential structures occupied by homeowners were destroyed.

Figure 40
FEMA Applicants Owner and Renter

Owner	26,856
Renter	13,577
Not Specified	250

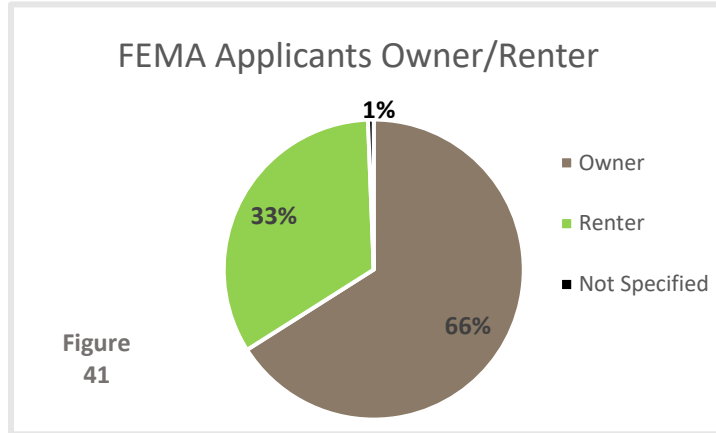


Figure 42 FEMA Verified Destroyed Owners

County	Destroyed Owners
Seminole	16
Decatur	11
Dougherty	11
Miller	11
Early	8
Worth	7
Crisp	4
Clay	3
Mitchell	3
Laurens	2
Thomas	2
Calhoun	1
Grady	1
Terrell	1
Tift	1
Baker	0
Lee	0
Randolph	0
Sumter	0
Turner	0
Total	82

Figure 43 FEMA Verified Destroyed Renters

County	Destroyed Renters
Seminole	8
Decatur	5
Dougherty	5
Miller	5
Early	3
Worth	3
Baker	2
Thomas	2
Calhoun	1
Crisp	1
Lee	1
Mitchell	1
Terrell	1
Turner	1
Clay	0
Grady	0
Laurens	0
Randolph	0
Sumter	0
Tift	0
Total	39

SBA Home Loans

The Small Business Administration (SBA) has made \$43,970,700 in assistance available to 1,821 applicants in the areas of impact. The low interest loans are available for the purposes of home repair and personal property loss. SBA makes loans to homeowners or renters to repair or replace disaster-damaged real estate and personal property. The total amount of the loan depends on the cost to repair the residence, less any insurance settlements or grants. By dividing the total dollars approved (\$43,970,700) by the total applications approved (1,821), the average loan of \$24,146 was determined for the 20-county region. The counties with the highest number of applications and dollars approved were Dougherty County, Decatur County, and Seminole County.

Figure 44 SBA Home Loans			
County	Applications Approved	Dollars Approved	AVG Loan Amount
Dougherty	462	\$ 10,488,300	\$ 22,701.95
Decatur	225	\$ 6,085,600	\$ 27,047.11
Seminole	154	\$ 5,155,300	\$ 33,475.97
Lee	147	\$ 3,216,100	\$ 21,878.23
Mitchell	125	\$ 3,076,400	\$ 24,611.20
Miller	87	\$ 2,360,800	\$ 27,135.63
Early	87	\$ 2,218,600	\$ 25,501.15
Terrell	74	\$ 1,677,600	\$ 22,670.27
Worth	78	\$ 1,576,600	\$ 20,212.82
Crisp	56	\$ 1,218,400	\$ 21,757.14
Sumter	44	\$ 1,130,900	\$ 25,702.27
Grady	51	\$ 1,094,300	\$ 21,456.86
Calhoun	47	\$ 1,061,700	\$ 22,589.36
Baker	34	\$ 676,100	\$ 19,885.29
Laurens	24	\$ 638,800	\$ 26,616.67
Turner	34	\$ 593,600	\$ 17,458.82
Tift	28	\$ 583,100	\$ 20,825.00
Thomas	30	\$ 502,300	\$ 16,743.33
Clay	16	\$ 318,700	\$ 19,918.75
Randolph	18	\$ 297,500	\$ 16,527.78
Total	1821	\$ 43,970,700	--

Business Impact SBA Business Loans

SBA provides low-interest disaster loans to businesses of all sizes, private non-profit organizations, homeowners, and renters. SBA disaster loans can be used to repair or replace the following items damaged or destroyed in a declared disaster: real estate, personal property, machinery and equipment, and inventory and business assets. The SBA provided a total of \$75,808,303 to businesses in need within the 20-county IA affected area. Businesses within Dougherty County and Lee County received the highest amount of loans totaling \$31,303,900 and \$21,113,900, respectively. Both counties are a part of the Albany Metropolitan Statistical Area. Dougherty County has nearly 90,000 residents and Lee County has nearly 30,000. This indicates a higher proportion of Lee County's businesses were affected. Businesses in Baker County, Sumter County, Calhoun County, Thomas County, and Randolph County received loans totaling less than \$100,000. No business within Clay County or Laurens County received SBA loans. Figure 36 provides the total loan amounts for each county declared eligible for individual and public assistance.

County	SBA Original Loan Amount
DOUGHERTY	\$31,303,900
LEE	\$21,113,900
SEMINOLE	\$9,268,200
WORTH	\$7,036,800
MILLER	\$2,370,200
DECATUR	\$1,521,600
CRISP	\$865,300
EARLY	\$623,500
MITCHELL	\$593,000
TERRELL	\$307,400
TURNER	\$202,000
GRADY	\$179,700
TIFT	\$129,200
BAKER	\$100,000
SUMTER	\$79,400
CALHOUN	\$58,500
THOMAS	\$30,600
RANDOLPH	\$25,100
CLAY	\$0
LAURENS	\$0
TOTAL	\$75,808,300

Infrastructure Impact – FEMA Public Assistance

Public Assistance is FEMA's largest grant program. The purpose of the program is to support communities' recovery from major disasters by providing them with grant assistance for debris removal, life-saving emergency protective measures, and restoring public infrastructure. Local governments, states, tribes, territories and certain nonprofit organizations are eligible for these funds. The Georgia Emergency Management and Homeland Security Agency oversees the Public Assistance Program and assists counties and local municipalities with applications for Public Assistance.

Figure 46 details the assistance received by each county in each of the categories. There was a total of \$34,984,844.08 in damages reported to public utilities within the 20-county affected area. A total of \$22,152,576.78 in debris removal was reported. In Category A, Dougherty County had \$12,526,644.57 in debris removal costs. This amount is far greater than any other county within the affected area. Baker County experienced \$2,254,093.04, the second highest debris removal amount in the area. According to the PA data, lesser amounts of damage was reported to roads and bridges than other FEMA Categories. Baker County reported \$501,507.85 in damage and Randolph County reported \$232,235.09. In Category D (Water Control Facilities), Lee County was the only jurisdiction to report damage to water control facilities.

Figure 46: FEMA Public Assistance

County	Category A Debris Removal	Category B Emergency Protective Measures	Category C Roads and Bridges	Category D Water Control Facilities	Category E Public Buildings and Contents	Category F Public Utilities	Category G Parks, Rec, and other facilities
Baker	\$2,254,093.04	\$70,276.40	\$501,507.85	0	0	0	0
Calhoun	0	\$122,866.01	0	0	\$8,517.27	\$14,541.64	0
Clay	0	\$24,497.11	\$37,708.58	0	0	0	0
Crisp	\$192,853.82	\$43,669.97	\$4,746.09	0	\$74,760.49	\$3,755,967.30	0
Decatur	\$77,000.81	\$332,804.22	\$73,796.86	0	\$143,098.71	\$135,788.90	\$38,823.35
Dougherty	\$12,526,644.57	\$893,397.97	0	0	\$50,000.00	0	0
Early	\$262,570.79	\$179,683.88	\$8,720.65	0	0	\$115,148.55	\$170,000.00
Grady	\$432,786.11	\$207,633.24	0	0	\$132,538.19	\$359,757.97	0
Laurens	\$816,127.90	\$135,843.10	0	0	\$4,000.00	\$51,529.76	0
Lee	\$424,720.31	\$286,872.99	0	\$66,301.83	\$68,181.60	0	\$69,732.51
Miller	\$66,071.53	\$265,212.19	\$14,917.08	0	\$79,565.61	\$20,827.21	\$76,431.58
Mitchell	\$746,083.38	\$326,318.38	\$30,826.19	0	0	\$444,765.39	\$45,582.51
Randolph	\$130,451.54	\$130,813.38	\$232,235.09	0	\$5,000.00	0	\$23,209.95
Seminole	\$170,089.00	\$255,986.61	\$19,874.88	0	0	\$28,700,796.58	0
Sumter	\$1,266,415.87	\$107,412.29	0	0	0	0	0
Terrell	\$155,513.74	\$63,213.07	\$158,120.98	0	\$29,645.05	\$16,296.65	0
Thomas	\$1,495,467.73	\$70,004.66	\$12,809.38	0	0	\$1,007,027.78	0
Tift	\$354,168.00	\$194,980.31	0	0	0	0	0
Turner	\$529,319.46	\$133,477.69	\$11,833.57	0	0	0	0
Worth	\$252,199.18	\$237,955.82	\$58,455.13	0	0	\$362,396.35	\$41,670.17
Total	\$22,152,576.78	\$4,082,919.29	\$1,165,552.33	\$66,301.83	\$595,306.92	\$34,984,844.08	\$465,450.07

Unmet Needs

Summary

The Unmet Needs Assessment seeks to evaluate the three core aspects of recovery – housing, infrastructure (which includes public facilities and services), and business. In this section, remaining unmet need will be calculated by first 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. These estimates are based on best available data at this time and may be adjusted in the future as additional data becomes available. After accounting for funds already made available through state and other federal assistance and other funds, the remaining estimated unmet need is approximately \$444,732,396. The federal allocation of \$41,837,000 million will allow the State of Georgia to address 9% of the estimated unmet need remaining. When examining the relative need by sector, business represents the greatest unmet need of \$250,476,562 (56%) of need, followed by the housing sector with \$132,935,144 (30%) of need, followed by the infrastructure sector with \$61,320,690 (14%) of need. Each of these three sectors will be addressed in detail in the sections to follow.

Housing Unmet Need

The core data on housing damage for the unmet housing needs calculation is based on data from FEMA’s Individual Assistance program. HUD calculates “unmet housing needs” as the number of housing units with unmet needs multiplied by the estimated cost to repair those units less repair assistance already provided. Each of the FEMA inspected units are categorized by HUD into one of five categories as shown in Figure 38, below.

Category	FEMA Inspected real property damage
Minor-Low	< \$3,000
Minor-High	\$3,000 - \$7,999
Major-Low	\$8,000 - \$14,999 and/or 1 to 4 feet of flooding on the first floor
Major-High	\$15,000 - \$28,800 and/or 4 to 6 feet of flooding on the first floor
Severe	> \$28,800 or determined destroyed and/or 6 or more feet of flooding on the first floor

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 multipliers provided by HUD for the State of Georgia (seen in the Figure 48). The multipliers use the median 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 for each eligible disaster. By multiplying the number of units by the multipliers, the housing unmet needs are calculated. The multiplier (\$46,360) for the State of Georgia is the same for each of the levels, Major-Low, Major-High, and Severe. Each of the units used in the calculation in Figure 39 are those above the damage thresholds and uninsured.

Figure 48: Total Damage Using HUD Unmet Needs Multipliers			
Category	Number of Units	Serious Unmet Needs Multipliers	Total Unmet Needs
Major-Low	167	\$46,360	\$7,742,120
Major-High	51	\$46,360	\$2,364,360
Severe	112	\$46,360	\$5,192,320
Total	330		\$15,298,800

Additional Housing Unmet Need

Methodology

Impact assessment methodologies have often utilized the Small Business Administration estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance data in combination with each other to triangulate and identify more accurate levels of unmet need than if the FEMA estimated losses were the sole source of information. Unfortunately, DCA was unable to obtain NFIP data for this disaster at the time of the development of this Action Plan. Therefore, DCA will use a combination of FEMA and SBA data in order to calculate a comprehensive Unmet Needs amount.

FEMA Individual Assistance data reflects the impact of a disaster on a population by illustrating the number of registrations and the number of households ultimately approved for housing assistance. This data shows us where the damage is found and indicates the broad concentrated areas of need and the estimated cost to repair each site. While this method is useful, this data lacks an accurate scale and leaves additional unmet needs unaccounted.

Utilizing SBA loan values as an indicator of the amount of support any individual household will require to fully repair their homes again provides a more comprehensive look at recovery than simply looking at a FEMA inspected damage. SBA sends construction specialists trained to evaluate a more detailed determination of current market cost to repair or replace a damaged structure. They also include up to 20% in costs for mitigation or resiliency needs to support a more comprehensive and often higher dollar estimate of recovery than that coming from FEMA. Although the SBA estimates are the greater of the two data sets, the figure is still likely an underestimate. HUD assisted homes will fund greater levels of energy efficiency, resilience or mitigation, causing the costs to be greater. The following two scenarios estimate additional unmet need that is not accounted for in Figure 48.

1. FEMA Applicants Failed Income Test for SBA Loan

Figure 49: FEMA Applicants, Failed Income Test for SBA, No Insurance, FVL + 0	
FEMA Applicants, Failed SBA Income Test, No Insurance, FVL +0	3,224
Average SBA loan	24,146
Unmet Need	\$77,846,704

FEMA Applicants, Failed Income Test for SBA, FVL +0	
Baker	3%
Calhoun	3%
Clay	2%
Crisp	4%
Decatur	12%
Dougherty	9%
Early	7%
Grady	4%
Laurens	2%
Lee	3%
Miller	4%
Mitchell	9%
Randolph	5%
Seminole	7%
Sumter	3%
Terrell	2%
Thomas	3%
Tift	4%
Turner	5%
Worth	6%

Based on income information provided as part of the FEMA registration process, FEMA applies an income test developed by SBA for its initial applicant screening. The SBA developed the minimum income levels or "minimum cost of living estimates" by applying a formula to the U.S. Department of Health and Human Services Federal Poverty Guidelines. FEMA automatically refers applicant registrations to the SBA Disaster Loan Program if an applicant's income meets the SBA minimum guidelines. SBA establishes minimum income levels by multiplying the poverty level for a family of one by a factor of 1.5, and multiplying the poverty level for families of greater than one by a factor of 1.25. SBA disaster loan applicants with income below the minimum income level are classified as Failed Income Test (FIT). FIT applicants are notified that their SBA disaster loan application has been denied and advised that they will be notified if there are any changes to the decision. It is highly probable this group of people have unmet needs.

2. SBA Applicants Not Approved for Funding

Figure 50: SBA Unfunded Applications	
Total Approved Applications	1,821
SBA Applications Declined or Withdrawn	3,878
Unmet Need	\$93,638,188

Figure 51: SBA Unfunded Applications by County			
Baker	2%	Miller	4%
Calhoun	2%	Mitchell	7%
Clay	1%	Randolph	3%
Crisp	4%	Seminole	8%
Decatur	13%	Sumter	3%
Dougherty	23%	Terrell	4%
Early	6%	Thomas	2%
Grady	3%	Tift	2%
Laurens	1%	Turner	2%
Lee	5%	Worth	4%

According to the SBA, “the majority of the declines are due to low credit scores. Applicants with credit score below the SBA’s limit are automatically declined. Many of the applicants in the affected areas are not able to meet the SBA’s criteria. To be approved for a SBA loan the following criteria is required of the damaged property applicant:

1. Applicants must have a credit history acceptable to SBA.
2. Applicants must show the ability to repay all loans.
3. Collateral is required for physical loss loans over \$25,000. SBA takes real estate as collateral when it is available. SBA will not decline a loan for lack of collateral, but requires you to pledge what is available.
4. Applicants who did not comply with the terms of a previous SBA loan may be considered ineligible. This includes borrowers who did not maintain flood and/or hazard insurance on previous SBA loans.

These totals less the FEMA Housing Assistance (\$9.8M) and SBA (\$43.9M) aid provided gives the remaining unmet need for housing is approximately \$132,935,144.

Figure 52: Housing Unmet Need	
HUD Calculation of Serious Unmet Needs	\$15,298,800
Additional Unmet Need	\$171,484,892
Less Funds Provided by FEMA/SBA	-\$53,848,548
Unmet Need	\$132,935,144

Infrastructure Unmet Needs

To calculate unmet needs for infrastructure projects, the Georgia Department of Community Affairs used data from FEMA's Public Assistance Program obtained from the Georgia Emergency Management Agency/Homeland Security (GEMA/HS) showing the amount needed to repair the permanent public infrastructure (Categories C to G) to their pre-disaster condition. The program pays for 75% of the project cost leaving a remaining 25% non-federal share. The State of Georgia stepped in to help offset the burden on local governments by covering 40% of the non-federal share, which equates to 10% of the total approved project cost. The overall formula is 75% federal share, 10% state share, and 15% local share. Based on this formula the local match remaining in the unmet need balance is estimated at \$8,369,558.26 for the local communities state-wide.

Infrastructure Category	Estimated Cost	Estimated Federal Share	Estimate Applicant Share
Category C	\$1,165,552.33	\$874,164.25	\$291,388.08
Category D	\$66,301.83	\$49,726.37	\$16,575.46
Category E	\$595,306.92	\$446,480.19	\$148,826.73
Category F	\$34,984,844.08	\$26,238,633.06	\$8,746,211.02
Category G	\$465,450.07	\$349,087.55	\$116,362.52
Total	\$37,277,455.23	\$27,958,091.42	\$9,319,363.81
Minus State Share			\$949,805.55
Total Unmet Need			\$8,369,558.26

Incentive counties received 12.5% from the State of Georgia, which equates to 50% of the non-federal share. Miller County, and its' municipalities, was the only county within the affected area to obtain this incentive. The state share listed in Figure 53 was adjusted to reflect this percentage. The Georgia Emergency Management Agency/Homeland Security (GEMA/HS) created incentive standards for communities affected by presidentially declared disasters. Achieving this level of preparation qualifies counties for a reduced local match (equal to the state rate) for Public Assistance programs. To be designated as an incentive county, the community must develop the four operational recovery plans listed below:

1. Participation in the National Flood Insurance Program; and
2. Establish and training of a local Preliminary Damage Assessment Team(s); and
3. Completion of yearly standards as outlined in GEMA/HS's Emergency Management Performance Grant Program (EMPG); and
4. Designation as a Storm Ready Community by the National Weather Service.

While using Public Assistance data is a good indicator of unmet needs, there are several projects still under development and are not reflected in Figure 53. DCA will work with GEMA/HS on a continuing basis to update this data.

Additional Unmet Infrastructure Needs

DCA consulted with affected local governments in order to determine if any additional infrastructure needs exist beyond the projects reports to FEMA. Figure 54 summarizes the amount of infrastructure needs as reported by the communities. The majority of the projects received from the communities were for road, water, sewer, and stormwater activities.

DCA has not yet evaluated the proposed projects to ensure compliance with CDBG-DR and Federal Register Requirements. **Communities and amounts listed in Figure 54 are not an indication of funding.** The purpose is to gauge the amount of unmet infrastructure needs in order to inform the proposed Method of Distribution.

Figure 54: Local Unmet Infrastructure Needs		
Community	County	Amount Needed
City of Attapulgus	Decatur	\$1,500,000
City of Boston	Thomas	\$1,700,000
City of Cairo	Grady	\$2,380,000
City of Camilla	Mitchell	\$4,500,000
City of Colquitt	Miller	\$3,500,000
City of Cuthbert	Randolph	\$2,500,000
City of Damascus	Early	\$300,000
City of Donalsonville	Seminole	\$7,175,000
City of Leary	Calhoun	\$1,850,000
City of Leesburg	Lee	\$3,500,000
City of Sumner	Worth	\$500,000
Decatur County	Decatur	\$2,300,000
Early County	Early	\$2,059,500
Grady County	Grady	\$8,650,000
Seminole County	Seminole	\$10,536,632
Total		\$52,951,132

Business Unmet Needs

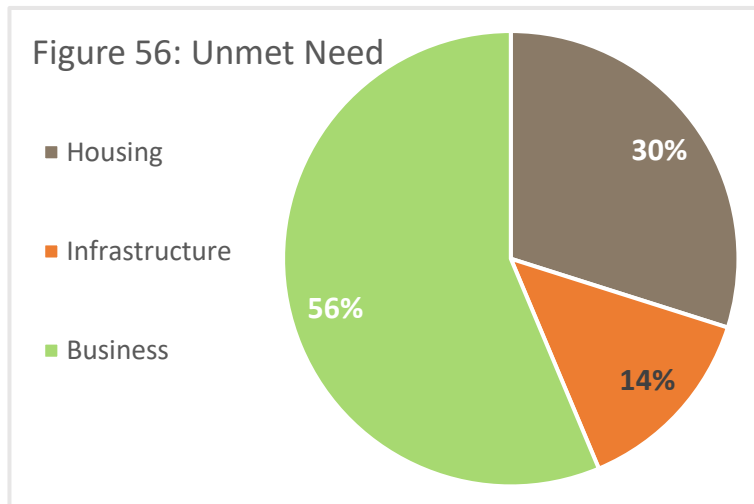
Using SBA business data to understand the financial impact to livelihoods provides a comprehensive understanding of impacts and unmet recovery needs for businesses across the state. The Small Business Administration makes low-cost disaster loans available to qualified businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. According to data provided by the SBA, FEMA referred 3,992 business owners to the SBA for loans. Of those, 630 (16%) applied for assistance, but only 110 were approved. The approved loans from Hurricane Michael totaled \$7,501,300. An average loan amount of \$68,194 was calculated by taking the total amount of loans, \$7,501,300, and dividing it by 110 (the total number of loans).

County	FEMA Referrals	Did Not Apply	Applications Received	Applications Approved 2-19-20	Applications Submitted, not approved	Amount Approved
Baker	108	103	5	1	4	\$25,000
Calhoun	88	77	11	2	9	\$33,500
Clay	40	37	3	0	3	0
Crisp	162	147	15	4	11	\$250,900
Decatur	533	491	42	8	34	\$269,400
Dougherty	917	786	131	43	88	\$3,447,600
Early	262	241	21	3	18	\$605,600
Grady	182	169	13	3	10	\$82,700
Laurens	24	19	5	0	5	0
Lee	202	181	21	5	16	\$593,100
Miller	218	204	14	3	11	\$94,700
Mitchell	303	274	29	12	17	\$415,100
Randolph	80	71	9	2	7	\$25,100
Seminole	326	288	38	8	30	\$1,058,200
Sumter	61	52	9	1	8	\$39,700
Terrell	125	105	20	7	13	\$304,600
Thomas	92	87	5	1	4	\$20,600
Tift	70	12	58	2	10	\$52,200
Turner	60	5	55	2	3	\$82,600
Worth	139	13	126	3	10	\$100,700
Total	3,992	3,362	630	110	311	\$7,501,300

By taking the average loan amount and multiplying it by 3,362 (the number of businesses that were referred by FEMA but did not apply for a loan), DCA calculated an unmet need of \$229,268,228. Additionally, by multiplying the average business loan amount by the number of applications that were submitted but not approved gives an additional unmet need of \$21,208,334.

Topic	Value	Unmet Needs
FEMA referrals that did not apply for SBA Loan	3,362	\$229,268,228
Applications not approved, or still in process	311	\$21,208,334
Total unmet business need		\$250,476,562

In sum, the following table indicates the unmet needs created by Hurricane Michael. The housing unmet needs (\$132,935,144), Business Unmet Needs (\$250,476,562) and Infrastructure Unmet Needs (\$61,320,690) far exceed the total unmet needs allocation from HUD (\$41,837,000).



Business	\$250,476,562
Housing	\$132,935,144
Infrastructure	\$61,320,690
Total	\$444,732,396

4. Method of Distribution

Introduction and Allocations

The Method of Distribution is tasked with allocating resources based on multiple layers of need and prioritization. HUD has provided the State of Georgia with \$41,837,000 in disaster recovery funds for unmet needs to assist in recovery efforts from Hurricane Michael. CDBG-DR funds will be used for necessary expenses related to long-term recovery, restoration and revitalization within the impacted areas. As required by Federal Register Notice 85 FR 4681, 80% of this allocation will be spent in the most impacted and distressed zip codes and 20% can be spent within counties declared eligible for FEMA’s individual and public assistance. Next, the funds are allocated to programs to satisfy unmet needs. Due to the varied damage from Hurricane Michael, DCA proposes creating programs in all three sectors, housing, business, and infrastructure. The funds will be allocated to the following programs: Homeowner Rehabilitation and Reconstruction (~~25%~~ 32%), ~~Small Business Economic Revitalization (20%)~~, Workforce Development (20%), and Infrastructure (~~20%~~ 33%). In addition, the following activities will be undertaken: Planning (10%), and administration (5%).

Eligible Communities

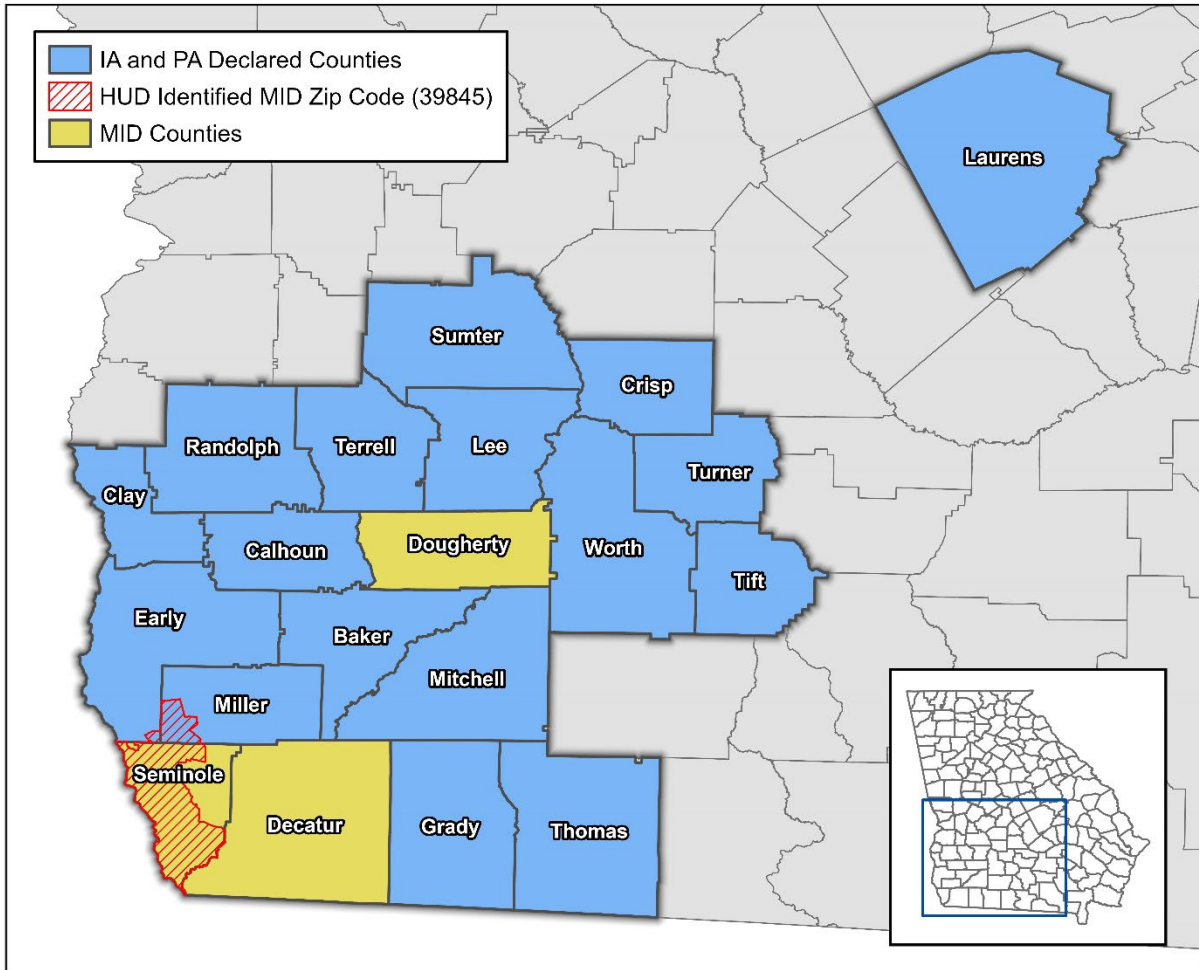
To prioritize limited funding in areas with the highest damage, HUD identified the zip code 39845 in Seminole County as Most Impacted and Distressed (MID). After further research, DCA also requested that HUD extend the MID designation to 39817 in Decatur County and 31705 in Dougherty County. This request was subsequently approved by HUD. It is required that a minimum of 80 percent of the allocation must address unmet needs within the county that contains the zip code. When the emergency declaration was issued for Georgia, 20 counties were designated for Federal Emergency Management Agency (FEMA) Public Assistance and Individual Assistance. Public Assistance grants were provided to governmental units for emergency infrastructure repairs and debris removal. Individual Assistance grants provided emergency funding to individuals to fulfill immediate housing and safety needs. These 20 communities are eligible for the remaining 20% of CDBG-DR funding. These counties are listed in Figure 59. A map of the eligible areas is shown in Figure 60.

Figure 58: HUD-Identified MID Area	
Zip Code 39817 Decatur County Zip Code 31705 Dougherty County Zip Code 39845 Seminole County	

Figure 59: Eligible Counties				
Baker	Dougherty	Miller	Terrell	= 20
Calhoun	Early	Mitchell	Thomas	
Clay	Grady	Randolph	Tift	
Crisp	Laurens	Seminole	Turner	

Decatur	Lee	Sumter	Worth	
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Hurricane Michael (DR-4400) Areas of Impact Figure 60



MID Expansion Request

DCA analyzed disaster data and determined Zip Codes 31705 in Dougherty County and 39819 in Decatur County suffered tremendous damage and have considerable remaining unmet needs. On April 14, 2020, DCA submitted a request to HUD to designate the additional zip codes as Most Impacted and Distressed. If the expansion request is approved, DCA will amend this Action Plan to include the additional zip codes. The request is located in Appendix D.

Connection to Unmet Needs

As detailed in the Impact and Unmet Needs Assessment section, Hurricane Michael caused extensive loss. Despite funds committed for emergency response and immediate recovery efforts, at least \$444,732,396 in unmet needs remain based on existing data. While the unmet needs far exceed the CDBG-DR allocation,

DCA has developed several programs to serve as a framework for recovery. Although the unmet housing needs exceed the amount of funds allocated, priority must also be placed on infrastructure and business programs to ensure a complete recovery. Other programs are dedicated to addressing unmet needs for affordable housing. Specifically, some of these programs are, Georgia’s Low Income Housing Tax Program (LIHTC), Community Home Investment Program (CHIP), The Georgia Dream Program, and the 2017 Unmet Needs CDBG-DR Allocation, and the CDBG Annual Competition.

The budget for the proposed CDBG-DR programs is shown in Figure 62.

Housing Recovery Efforts and Promoting Affordable Housing

DCA has created a myriad of programs to facilitate the overall recovery from Hurricane Michael and indirectly assists with housing recovery. The infrastructure, small business loan, and workforce development programs assist with housing recovery efforts. Specifically, undertaking infrastructure activities such as: water/sewer/stormwater, streets/bridges, and drainage systems directly improves quality of life for all residents and provides a stable foundation that allows for housing recovery in impacted areas. For example, completing a stormwater infrastructure project can help alleviate flooding in residential areas. Economic Revitalization Programs such as workforce development and small business loan programs help create a thriving community. These programs give residents the resources they need to be able to recover from Hurricane Michael.

Additionally, DCA is currently consulting with the local governments within the MID areas to determine the extent of unmet rental housing needs. Within Dougherty County, a MID area, DCA is using the 2017 Unmet Needs CBDG-DR allocation to renovate 120 rental units for low-income individuals to replace rental housing stock lost from the January 2017 tornadoes. If the demand exists within the MID areas, DCA will re-allocate funds from the Small Business Economic Revitalization Program or the Workforce Development Program to create a program to serve the needs of the rental population.

Public Housing Authorities

DCA will identify and address the rehabilitation, reconstruction and replacement of housing and shelters in the areas affected by the disaster. DCA contacted Public Housing Authorities (PHA) located in the Most-Impacted and Distressed (MID) areas to gather information related to the unmet needs of PHAs. The following was emailed to Public Housing Authorities in the area on May 1, 2020, “... This email is to inform you about the development of the draft plan and to seek your feedback. Additionally, we would like to know if you have any units with unmet needs. These would be units that were damaged by Hurricane Michael that need repair or reconstruction assistance that insurance proceeds or other assistance did not fully repair or replace.” The Cordele Housing Authority responded on June 3, 2020 with information regarding roof damage that was sustained, but FEMA funds were utilized to pay for the cost. This was the only response received.

If a Public Housing Authority has any unmet needs, they can reach out to DCA directly at:

MAIL	EMAIL
Georgia Department of Community Affairs Attention: CDBG-DR 60 Executive Park South, NE Atlanta, Georgia 30329	CDBG-DR@dca.ga.gov

Homeless Needs

If the need arises funds may be used for homelessness prevention.

Budget

At a minimum, \$33,470,000 must be spent within the Most Impacted and Distressed area. The remaining 20%, or \$8,367,000, can be spent within the 20 eligible counties. Figure 61 provides the analysis of this requirement.

Figure 61: MID Budget		
Area	Allocation	% of Allocation
Most Impacted and Distressed Zip Codes: <u>39817, 31705, and</u> 39845	\$33,470,000	80
20 County Area: List Counties Baker, Calhoun, Clay, Crisp, Decatur, Dougherty, Early, Grady, Laurens, Lee, Miller, Mitchell, Randolph, Seminole, Sumter, Terrell, Thomas, Tift, Turner, Worth	\$8,367,000	20
Total	\$41,837,000	100

Programs and Allocations Summary

Figure 62: Programs and Allocations						
Program Type	Program	Allocation	% of Allocation	Amount Serving LMI	LMI %	National Objective
Housing	Homeowner Rehabilitation and Reconstruction	\$10,459,250	25%	\$7,321,475	70%	LMI; UN
		<u>\$13,248,383</u>	<u>32%</u>	<u>\$9,273,868</u>		
Business	Small Business Economic Revitalization	\$8,367,400	20%	\$4,183,700	50%	LMI; UN
	Workforce Development	\$8,367,400	20%	\$8,367,400	100%	LMI
Infrastructure	Competitive Infrastructure	\$8,367,400	20%	\$5,857,180	70%	LMI; UN
		<u>\$13,945,667</u>	<u>33%</u>	<u>\$9,761,967</u>		
Total Program Budget		\$35,561,450		\$25,729,755 <u>\$27,403,235</u>		
	Administration	\$2,091,850	5%	\$0	N/A	N/A
	Planning	\$4,183,700	10%	\$0	N/A	N/A

Grand Total	\$41,837,000	100%	\$25,729,755 \$27,403,235
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Programs

Homeowner Rehabilitation and Reconstruction Program

National Objective: Benefit to low- and moderate-income persons and Urgent Need

CDBG-DR Allocation: ~~\$10,459,250~~ \$13,248,383

Projected Accomplishments: Estimated to serve 100 households

Proposed Start Date: ~~January 2021*~~ March 2022*

Proposed End Date: January 2024

Maximum Award: Rehabilitation \$75,000 | Reconstruction \$150,000

Administering Entity: DCA will administer this program directly through a prime vendor

**DCA is prepared to deploy this program before the estimated January 2021 date if the Agency's Action Plan and the HUD/DCA Grant Agreement is executed more rapidly than anticipated. Due to the COVID-19 Pandemic, which was not anticipated, the start-up date for the program was delayed.*

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. In order to promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation. The program also includes Temporary Housing Assistance based on individual household needs and their participation in the Housing Rehabilitation and Reconstruction Program to be awarded on a case-by-case basis.

Eligible Areas

80% of these funds will be available for the MID areas, 20% will be available for the 20-County area declared eligible for Individual and Public Assistance.

Applicant criteria

All applicant homeowners will be held to the following criteria as conditions of eligibility. This is not an exhaustive list. The exhaustive list will be provided in the program policies and procedures.

- Must be primary resident homeowner, no second homes allowed
- A control measure will be put in place in the policies and procedures to prevent the resale of rehabilitated homes solely for profit.
- Only homeowners who either maintain flood insurance or have incomes under 120% of the Average Median Income may qualify for rehabilitation assistance. However, to receive assistance and remain in the floodplain, flood insurance must be maintained.

Prioritization Criteria

Due to limited time and resources, priority will be given to applications from households in the Homeowner Rehabilitation Program based on LMI status, the presence of household members over the age of 62, presence of household members with a disability, households with children (under 18), persons with alcohol or other drug addictions, or persons with HIV/AIDS and their families. For a period of 45 days, applications from those prioritized households will be processed. All priorities are weighted equally and

will not be allowed overlap. Either an application is prioritized or it is not. Applications from non-prioritized households may be submitted, but will not be processed or awarded funds until after this initial 45-day period.

Non-Profit Subrecipients

DCA hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove obstacles to applicant participation. DCA may enter into subrecipient agreements with the agencies so that housing counseling and legal services are provided and complete applications can be made.

NFIP Requirement

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

Elevation

In order to promote long-term recover and limit damage from future disasters, DCA will apply elevation standards for new construction, repair of substantially damaged structures, or substantial improvements to structures located within the 100-year floodplain. Structures will be elevated to ensure the lowest floor, including the basement, is at least two feet above the base flood elevation which is the minimum height requirements set forth in the February 9, 2018, Federal Register Notice.

DCA will require subrecipients to document that elevation is the most cost reasonable option to promote the community's long-term recovery as opposed to alternative strategies.

The average cost of elevating a home can range from \$20,000 to \$100,000, depending on many different factors of the project. Considering these averages, elevations will be allowed up to \$50,000 and on a case-by-case basis, as to ensure the method is cost effective. DCA may re-evaluate the elevation costs caps during the implementation of the Homeowner Rehabilitation Program based on average costs associated with elevating homes and on a case-by-case basis as needed. When elevation occurs, the subrecipient will be required to ensure the accessibility for persons with disabilities is preserved.

Not Suitable for Rehabilitation

The definition of "not suitable for rehabilitation" will be defined in the policies and procedures governing the program.

Temporary Relocation

The Temporary relocation assistance policy will be included in the policies and procedures for the Homeowner Rehabilitation and Reconstruction Program.

Application Status

Applicants will be able to determine application status through the case managers. DCA's website will include a listing of all intake centers and phone numbers of the centers.

Ineligible Activities

Ineligible activities will be defined in the program guidelines.

Exceptions to Maximum Assistance

DCA will make exceptions to the maximum amount of assistance available to a beneficiary when necessary to comply with federal accessibility standard or to make a reasonable accommodation for a person with disabilities.

~~Small Business Economic Revitalization Program~~

~~National Objective:~~ Benefit to low- and moderate-income persons and Urgent Need

~~CDBG-DR Allocation:~~ \$8,367,400

~~Projected Accomplishments:~~ Estimated to serve 125 businesses

~~Proposed Start Date:~~ January 2021

~~Proposed End Date:~~ January 2026

~~Maximum Award:~~ \$250,000

~~Administering Entity:~~ DCA

Eligible Areas

~~80% of these funds will be available for businesses within the MID areas, 20% will be available for the 20-County area declared eligible for Individual and Public Assistance.~~

Ineligible Activities and Applicant Eligibility Criteria

~~Ineligible activities and eligibility criteria for applicants will be defined in the program policies and procedures.~~

Program Summary

~~Small Business owners suffering physical damage or economic loss may receive loans up to \$250,000 with favorable interest rates in order to help ensure business survival. This Economic Revitalization Program will help create and retain jobs that will improve the economic viability of areas impacted by Hurricane Michael. Many small businesses were impacted and are struggling to survive. This program will provide capital to these businesses to assist in retaining and creating jobs. A delegated lending model with local lenders will be used to deploy funds efficiently and to leverage private investment. DCA will define eligible uses, eligible business sizes, the loan structure, and loan terms in the program policies and procedures.~~

Workforce Development Program

National Objective: Benefit to low- and moderate-income persons

CDBG-DR Allocation: \$8,367,400

Projected Accomplishments: Estimated to serve 400 individuals

Proposed Start Date: June 2021

Proposed End Date: June 2025

Maximum Award: 100 percent of the cost of the employment services provided to the participant

Administering Entity: Subrecipient

Eligible Areas

80% of these funds will be available for the MID areas, 20% will be available for the 20-County area declared eligible for Individual and Public Assistance.

Ineligible Activities and Applicant Eligibility Criteria

Ineligible activities and eligibility criteria for applicants will be defined in the program policies and procedures.

Program Summary

Hurricane Michael had profound and lasting effects on the economy within Southwest Georgia. The intent of this program is to boost long-term recovery by supplying residents of impacted communities with the necessary skills to increase household income. Activities under this program may include, but is not limited to, On-the-Job Training, Customized Training, and Job Readiness services. Eligibility for employment services will be limited to residents that are at or below 80% of Area Median Income. DCA will select a qualified non-profit organization for the administration of this program.

CDBG-DR Infrastructure Program

National Objective: Benefit to low- and moderate-income persons and Urgent Need

CDBG-DR Allocation: ~~\$8,367,400~~ ~~\$13,945,667~~

Projected Accomplishments: Estimated to serve 600 individuals

Proposed Start Date: ~~January 2021~~ ~~August 2022*~~

Proposed End Date: January 2027

Maximum Award: \$750,000 for 20-county region | No project maximum for MID Area

Administering Entity: Local Government Subrecipients – Competitive Awards based on applications

*Due to the COVID-19 Pandemic, which was not anticipated, the start-up of the program will be delayed.

Program Summary

The goal of the CDBG-DR Infrastructure Program is to fund infrastructure projects in communities impacted by Hurricane Michael. Projects funded under this program may include, but are not limited to, water/sewer/stormwater, streets/bridges, drainage systems, and facilities. DCA will encourage activities related to storm water management in flood-impacted areas. Specifically, DCA will work with the MID areas directly to identify unmet needs and associated costs of needed storm water infrastructure. DCA will also encourage subrecipients to incorporate mitigation measures to reduce future risk to the jurisdiction. Activities funded through this program must have a tie back to the disaster. DCA will rely on professional engineers, procured by the subrecipients, to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure and ensure that the construction or rehabilitation of storm water management systems in flood areas will mitigate future flood risk. DCA will evaluate each application to ensure alignment with other planned state or local capital improvements and infrastructure development efforts. DCA will encourage applicants to incorporate resiliency measures into the projects.

Eligible Areas

80% of these funds will be available for the MID areas, 20% will be available for the 20-County area declared eligible for Individual and Public Assistance.

Ineligible Activities and Applicant Eligibility Criteria

Ineligible activities and eligibility criteria for applicants will be defined in the program policies and procedures.

Consideration of Costs and Benefits

DCA 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.

Impacts of Activities on Members of Protected Classes and Vulnerable Populations

With the submission of CDBG-DR Infrastructure Applications, DCA will require the Subrecipients to consider and document the impacts of the proposed infrastructure activities 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. DCA will take into account the proposed project's effect on protected classes when scoring applications.

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.

Planning

CDBG-DR Allocation: \$4,183,700

Proposed Start Date: January 2021

Proposed End Date: January 2027

Administering Entity: DCA

Eligible Areas

80% of these funds will be available for the MID areas, 20% will be available for the 20-County area declared eligible for Individual and Public Assistance.

Program Summary

DCA encourages communities to consider post-disaster recovery planning, especially those in the Most Impacted and Distressed areas. This is an allowable expense under the planning allocation. This includes development, adoption, and enforcement of modern and/or resilient building codes and mitigation of hazard risk, including possible sea level rise, high winds, storm surge, and flooding. DCA has consulted with the Georgia Emergency Management and Homeland Security Agency (GEMA/HS) on the possibility of creating Debris Removal Plans for the communities declared eligible for FEMA's IA funds. Additionally, funds will be made available to assist communities with participation in the National Flood Insurance Program, establishing and training of a local Preliminary Damage Assessment Team(s); completion of yearly standards as outlined in GEMA/HS's Emergency Management Performance Grant Program (EMPG); and/or achieving designation as a Storm Ready Community by the National Weather Service. A portion of the planning funds will be utilized by DCA for the costs associated with, but not limited to, development of the Action Plan, subsequent amendments, and program guidelines.

Competitive applications will not be used for this activity. Any community interested in using CDBG-DR planning funds should contact CDBG-DR Program Staff.

Contact information is listed below:

MAIL	EMAIL
Georgia Department of Community Affairs Attention: CDBG-DR 60 Executive Park South, NE Atlanta, Georgia 30329	CDBG-DR@dca.ga.gov

Administration

CDBG-DR Allocation: \$2,091,850

Proposed Start Date: January 2021

Proposed End Date: January 2027

Administering Entity: DCA

Application Review Process

Homeowner Rehabilitation and Reconstruction Program

Individual homeowners will meet with prime vendor's case managers to fill out applications. Case managers will complete an eligibility review once the application is fully completed. Eligibility criteria for applicants is defined in the policies and procedures for the program. Once DCA staff have performed the final review of the applications, a determination of award will be made. If applicants are eligible and funds are available, the applicant will be awarded.

Infrastructure Program

CDBG-DR applications will be created and submitted in the manner deemed appropriate by the Department. Applications will initially be reviewed for threshold criteria compliance. If threshold items are missing, staff will work with the applicant to obtain them and clear the application of its threshold review. If the threshold items render the application ineligible, the application will be rejected. If no threshold items are missing, the application will be cleared to be reviewed by the CDBG-DR team. The CDBG-DR team will review the application for competitiveness and compliance factors and score the application according to the Scoring Matrix. Other agencies may be consulted on an as-needed basis for input as to the need of the proposed projects. DCA's CDBG-DR Staff will score the applications. DCA will notify applicants of award recommendations or failure to fund. Subrecipient agreements will be executed with projects selected for funding.

Applicants are required to submit maps to DCA 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. Applicants must demonstrate to DCA that a thorough review has been conducted at the local level that assesses areas of greatest need throughout the jurisdiction.

Infrastructure Scoring Matrix	
Categories	Maximum Points
Cost to Implement/Calculated Benefit	30
Program Need	30
Effect on Protected Classes & Demographic Need	25
Leverage of Additional Resources	25
Program Feasibility	20
Program Strategy	20
Readiness to Proceed	15
Maximum Total Points	165

Small Business Economic Revitalization Program

~~Eligible businesses shall submit applications to DCA for consideration of loan approval. DCA may require site visits and discussions with applicants prior to the submission of applications. Specific criteria and in-detail application review process will be detailed in the Program Policies and Procedures. If applicants are eligible and funds are available, the applicant will be awarded.~~

Workforce Development Program

Residents within the 20 county area will submit applications for workforce development related services to the ~~vendor contracted participating technical college that is assisting DCA in~~ ~~by DCA to assist in~~ program implementation. DCA will develop Program Policies and Procedures that detail the application review process for the program. If applicants are eligible and funds are available, the applicant will be awarded.

Expenditure Schedule

Figure 63: Unmet Needs Projected Expenditure Schedule - Updated 7/2022

Year	Quarter	Admin	Planning	HRRP	Infrastructure	Small Business	Workforce Development	Total	%
2021	Q1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0.0%
	Q2	\$1,996	\$0	\$0	\$0	\$0	\$0	\$1,996	0.0%
	Q3	\$49,322	\$5,799	\$15,521	\$1,729	\$0	\$23,799	\$96,171	0.2%
	Q4	\$17,771	\$986	\$8,194	\$0	\$0	\$4,607	\$31,558	0.1%
2022	Q1	\$0	\$77	\$4,908	\$0	\$0	\$75,529	\$80,515	0.2%
	Q2	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q3	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q4	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
2023	Q1	\$106,461	\$219,834	\$695,777	\$733,891	\$0	\$434,919	\$2,190,882	5.2%
	Q2	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q3	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q4	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
2024	Q1	\$106,461	\$219,834	\$695,777	\$733,891	\$0	\$434,919	\$2,190,882	5.2%
	Q2	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q3	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q4	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
2025	Q1	\$106,461	\$219,834	\$695,777	\$733,891	\$0	\$434,919	\$2,190,882	5.2%
	Q2	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q3	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q4	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
2026	Q1	\$106,461	\$219,834	\$695,777	\$733,891	\$0	\$434,919	\$2,190,882	5.2%
	Q2	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q3	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
	Q4	\$106,461	\$219,834	\$695,777	\$733,891	0	\$434,919	\$2,190,882	5.2%
Total		\$2,091,850	\$4,183,700	\$13,248,383	\$13,945,667	\$0	\$8,367,400	\$41,837,000	100%

General Requirements

1. CDBG-DR Program National Objectives

As stewards of federal CDBG funds, the State of Georgia complies with the Department of Housing and Urban Development's (HUD) mission to develop viable communities by the provision of decent housing, a suitable living environment and expanding economic opportunities. To this end, all funded activities administered by the State of Georgia will meet one of three named HUD national objectives: benefitting LMI persons; preventing or eliminating slum or blight, or meeting urgent needs. The Georgia Department of Community Affairs has designed this CDBG-DR program in compliance with the National Program objectives, and will ensure that assistance is prioritized toward the most disadvantaged populations. DCA will ensure, as is required in the Federal Register, that not less than 70 percent of the aggregate of CDBG-DR program funds be used to support activities benefitting low- and moderate-income persons. The

required minimum amount of funds to benefit LMI persons is \$24,893,015. Figure 64 details the LMI projections by program. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI) in the region in which the applicant lives.

Figure 64: Low-to-Moderate Income Budget				
Program Type	Program	Amount Serving LMI	LMI %	National Objective
Housing	Homeowner Rehabilitation and Reconstruction	\$7,321,475 <u>\$9,273,868</u>	70%	LMI; Urgent Need
Business	Small Business Economic Revitalization Program	\$4,183,700	50%	LMI; Urgent Need
	Workforce Development	\$8,367,400	100%	LMI; Urgent Need
Infrastructure	Competitive Infrastructure	\$5,857,180 <u>\$9,761,967</u>	70%	LMI; Urgent Need
Total Program Budget		\$25,729,755 <u>\$27,403,235</u>		

2. Duplication of Benefits

In accordance with the Robert T. Stafford Act, as amended, the DCA will implement policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to recover from Hurricane Michael. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss for which the person has received financial assistance under any other program, from private insurance, charitable assistance or any other source. To prevent duplication of benefits, DCA will require that all sources (federal, state, local, private, charitable) and amounts of disaster assistance received or reasonably anticipated are documented with submission of an application for CDBG-DR funding. DCA will monitor and review information provided to determine what, if any, duplication might occur. Applicant awardees must subrogate any additional funds received for damage caused by the presidentially declared disasters back to DCA.

3. Public Services

DCA may enter into subrecipient agreements with qualified non-profit agencies to provide services to individual applicants or local government subrecipients. Additional consideration may be given to citizens with wide-ranging disabilities, including mobility, sensory, developmental, emotional, and other impairments. All public services activities undertaken will be consistent with those listed in 24 CFR 570.201(e).

4. Eligible Activities

Homeowner Rehabilitation and Reconstruction: Section 105(a)(4) of the HCD

Workforce Development Program: Public Services 24 CFR 570.201(e)

~~Small Business Economic Revitalization Program: 24 CFR 570.203~~

Infrastructure: 570.201(c)

5. Reasonable Costs

Reasonable Costs – Housing

To ensure construction costs are reasonable and consistent with market costs at the time and location of construction, DCA or a contracted vendor will utilize cost-estimating software to create a list of common housing rehabilitation or reconstruction materials. To ensure the prices generated by the software are accurate, DCA or a contracted vendor will ask local contractors interested becoming qualified vendors to prepare price estimates for those materials. DCA or a contracted vendor will not share the price list generated by the estimating software with the proposed bidders. DCA staff or a contracted vendor will review the differences between the two sets and set the standard for the costs.

Reasonable Costs – Infrastructure

All infrastructure applications, regardless of requested amount, will undergo cost verification during the application review phase.

6. Long Term Recovery Planning

All programs will incorporate, where applicable, appropriate mitigation measures and floodplain management. The programs will promote sound, sustainable long-term recovery planning informed by a post disaster evaluation of hazard risk, especially construction standards and land-use decisions that reflect responsible floodplain and wetland management and consider continued sea level rise, when applicable; and consult with Regional Planning Commission on the development of the Action Plan to ensure consistency.

There is a need to build on-going resiliency strategies in coordination with local governments for a more targeted investment and updated unmet needs assessment.

GEMA has developed a comprehensive hazard mitigation strategy that seeks to eliminate or reduce risk and vulnerability to natural hazards in the State of Georgia. The strategy provides the framework for hazard mitigation strategies and actions undertaken by local and state governments within the State of Georgia. Activities undertaken with CDBG-DR Funds will be compliant with this plan. The plan is available at: https://gema.georgia.gov/sites/gema.georgia.gov/files/related_files/document/2014%20GHMS.pdf

7. Unmet Need Arising From DR-4400 and Subsequent Disaster Events

Funds may be used to address an unmet need that was created by Hurricane Michael (DR-4400) and was exacerbated by another disaster.

8. Leveraging other Resources for Recovery

Homeowner Rehabilitation and Reconstruction Program: No match or leverage is required for this program.

Workforce Development Program: No match or leverage is required for this program.

~~Small Business Economic Revitalization Program: DCA will require the business participants of this program to contribute to the project costs. These contribution requirements will be defined in the Program Policies and Procedures.~~

Infrastructure: DCA is not requiring local government subrecipients to provide a match, however DCA encourages local governments to provide leverage to have a greater impact of disaster recovery. Leverage will be considered in the scoring matrix.

9. Construction Standards

The housing assistance provided under the CDBG disaster recovery program will be built with emphasis on high quality, durable, sustainable, energy efficient, and mold resistant construction methods and materials. These include the following minimum standards:

- Construction standards will be based on Georgia's Construction Code Program and must meet or exceed applicable requirements.
- Construction will comply with a Green Building Standard for all new construction of residential buildings and for all repair of substantially damaged residential buildings. The state will require that all new construction or repair of substantially damaged residential buildings will meet an industry-recognized standard that has achieved certification under at least one of the programs listed in paragraph B.32.a of Section VI. (83 FR 5850 and 83 FR 5861).
- For rehabilitation of non-substantially damaged buildings (where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab), the state will follow the Green Building Retrofit Checklist.
- DCA will provide a mechanism for homeowners to appeal the quality of the rehabilitation work. DCA will require a warranty period post-construction for housing with all work being performed by the contractor. Information about the complainant's rights and how to file a complaint or appeal regarding the quality of work will be printed on program applications and/or guidelines. Complaints should be submitted to the local government subrecipient and responded to in a timely manner. Records of each complaint will be kept on file.
- Housing activities must meet the federal accessibility standards under the fair Housing Act, Section 504, and the Americans with Disabilities Act.

10. Anti-displacement

The State of Georgia plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. The state will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The State accepts the HUD waiver of the Section 104(d) requirements which assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-5938-N-01.

11. Program Income

If program income is generated by CDBG-DR programs, the State of Georgia will follow guidance provided in section 17 (Program income alternative requirement) in 81 FR 39702 (2016). Per that guidance, income received prior to the grant closeout will be utilized as additional CDBG-DR funds in the same manner as other CDBG-DR funds referenced. Any income received after the grant closeout, will be utilized for eligible CDBG Activities.

12. Pre-Agreement Activities

The provisions of 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs incurred by itself or its recipients sub grantees or sub recipients on or after the incident of the covered disaster prior to the execution of a grant agreement with HUD. This includes but is not limited to activities supporting program development, action plan development and stakeholder involvement support and other qualifying eligible costs incurred in response to DR-4400.

DCA incurred pre-award costs and will seek reimbursement for these costs that are reasonable and allowable under this regulation. These include the cost for salary, fringe benefits, and direct operating costs for each employee based on their individual percentage of time spent on the planning of the 2018 allocation for the CDBG-DR program.

13. Citizenship

Per O.C.G.A 50-36-1, one person on the application for a loan, grant, and/or other public benefit with an ownership interest in part or in whole must be able to demonstrate lawful presence in the United States.

14. Demonstrable Hardship & Exceptions

DCA will further develop a policy devoted to hardships and exceptions for each of the programs under this award. DCA will consider changes to the maximum award amounts for applicants who demonstrate undue hardship as well as other exceptional situations. Demonstrable hardship may include but is not limited to: prolonged job loss, substantial reduction of household income, death of a family member on whom the surviving household was financially dependent, illness, unexpected and extraordinary medical bills, disability, etc. DCA will further define “demonstrable hardship” and the exception policies in program policies and procedures.

15. Limited English Proficiency

DCA is committed to furthering fair housing through established affirmative marketing and outreach activities, among other activities. DCA will take steps in accordance with the Fair Housing Act of 1968 to reduce disparities in housing choice, access, and opportunities based on protected class (e.g., race, color, religion, familial status, sex, national origin or disability). DCA will work to eliminate disparities in the benefits of, different requirements for participation in, and other forms of discrimination in programs or activities receiving Federal financial assistance in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1975, and Section 109 of the Housing and Discrimination Act of 1974. Toward achieving that objective, DCA will ensure that its outreach, communication, and public engagement efforts are comprehensive and accessible in order to reach as many impacted citizens as possible, in accordance with this Language Access Plan.

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Where a significant number of non-English speaking residents can be reasonably expected to participate in public hearings or open comment periods, materials to be handed out will be translated into the appropriate language, citizen comments in a language other than English will be translated. The Action Plan, amendments, and vital documents will be translated into Spanish.

16. Affirmatively Furthering Fair Housing

Homeowner Rehabilitation and Reconstruction Program

The activities related to the rehabilitation and reconstruction portion of the program will take place at existing residences. The replacement portion of the Homeowner Rehabilitation and Reconstruction program will strive to make decisions to lessen area racial, ethnic and low-income concentrations and/or promote affordable housing in low poverty, non-minority areas. Residents will be able to choose where their replacement unit is located, within program guidelines and in accordance with local building and zoning codes.

DCA will create a Marketing Plan that describes advertising, outreach, and other marketing activities to inform residents of the program to ensure all residents have access to the opportunity for funding.

~~Small Business Economic Revitalization Program~~

~~DCA will create a Marketing Plan that describes advertising, outreach, and other marketing activities to inform residents of the program to ensure all residents have access to the opportunity for funding.~~

Workforce Development Program

DCA will require subrecipients to create a Marketing Plan that describes advertising, outreach, and other marketing activities to inform residents of the program to ensure all residents have access to the program.

Competitive Infrastructure Program

Proposed activities will undergo Affirmatively Furthering Fair Housing (AFFH) review before approval. Such review will include an assessment of the proposed project area's demography, socioeconomic characteristics, environmental hazards or concerns and other factors material to the AFFH determination. Activities should lessen area racial, ethnic, and low-income concentrations and/or promote affordable housing in low- poverty, non-minority areas in response to natural hazard-related impacts, where applicable. As detailed on the scoring matrix on Page 46, there is a total of 25 points dedicated to the project's effect on protect classes and demographic need. Projects that do not lessen area racial, ethnic, and low-income concentrations and/or promote affordable housing in low- poverty, non-minority areas in response to natural hazard-related impacts (where applicable) will receive a low score.

Appendix A: Citizen Participation Plan



CDBG-DR Citizen Participation Plan 2018 UNM Allocation

In accordance with Public Law 115-254, this document was prepared by DCA to meet the requirements of the CDBG-DR funding following Hurricane Michael (DR-4400). The Citizen Participation Plan reflects the alternative requirements as specified by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register 85 FR 4681 and any amendments, as applicable. DCA will ensure the Citizen Participation Plan meets the CDBG-DR regulations and takes into consideration any waivers and alternatives made available by HUD.

The Citizen Participation Plan is designed to ensure citizens of the State of Georgia, particularly persons of low and moderate income residing in areas where it is proposed that such funds are to be used, are provided the opportunity and encouraged to participate in the planning and implementation of CDBG-DR activities.

Outreach Summary

In anticipation of receiving CDBG-DR funds, DCA incorporated specific citizen participation requirements into its CDBG-DR Action Plan. This plan outlines how DCA intends to meet these requirements. The objectives of DCA's outreach activities are to ensure that all citizens are aware of the CDBG Disaster Recovery funding and the planning process and have the opportunity to comment on or suggest proposed uses for the funds.

The State of Georgia will ensure all HUD requirements for citizen engagement are met. DCA will hold meetings that are open to elected and appointed officials from all FEMA Individual Assistance (IA) and Public Assistance (PA) declared counties as a result of the 2018 disaster. DCA will initiate outreach through the following mechanisms: conference calls, webinars, emails, and in-person meetings. DCA will also host phone calls and communicate through email with local elected officials to ensure feedback is consistent and continual. DCA will also distribute periodic CDBG-DR status updates produced by the State's CDBG-DR Director, Project Manager, and/or Coordinator and facilitate community meetings with local officials and staff to discuss program guidelines, planning, and to receive feedback from local jurisdictions.

Fair Housing

DCA is committed to furthering fair housing through established affirmative marketing and outreach activities. DCA will take steps based on the Fair Housing Act of 1968 to reduce disparities in housing choice, access, and opportunities based on protected class (e.g., race, color, religion, familial status, sex, national origin or disability). Toward achieving that objective, DCA will ensure that its outreach, communication and public engagement efforts are comprehensive in order to reach as many impacted citizens as possible.

DCA will make every attempt to hold all stakeholder meetings in a time and location convenient to potential beneficiaries. The meetings will be held in an accessible location, and sign language interpreters will be made available upon advance request. DCA will also provide interpretation services for non-English speaking residents at the meetings upon advance request. Stakeholders and citizens will be notified of the public hearing at least two (2) weeks before they are held.

DCA will require local government subrecipients to certify that they will Affirmatively Further Fair Housing (AFFH). This section of the Citizen Participation Plan outlines various options available to local governments in meeting this grant obligation. While the law does not specify what type of action subrecipients must take, it is clear that by virtue of receipt of CDBG funds, local government subrecipients are obligated to take some sort of action to affirmatively further the national goal of fair housing. DCA will require subrecipients to document and keep record of fair housing activities.

Copies of brochures provided to participants, minutes of meetings where fair housing is discussed, and any other records must be available for review by the DCA CDBG-DR Program Representative(s). The following is an example of possible fair housing activities. Although not inclusive, its purpose is to suggest a range of activities that would satisfy the subrecipient's obligation. Technical assistance would be available from DCA if subrecipients desired to implement any of these suggestions. DCA will monitor subrecipients to ensure AFFH obligations were met.

Possible Actions to Affirmatively Further Fair Housing:

- Analyze any impediments to fair housing choice which may exist in your community. Contact HUD or DCA for an analysis of any fair housing complaints from the area.
- Review local zoning laws and procedures to determine whether they contribute to, or detract from, progress in fair housing. Establish a collection of zoning and land use planning material to have available for the use of local fair housing groups as well as subrecipient staff.
- Provide funding for local fair housing groups (eligible under the CDBG-DR Program) or provide financial or technical assistance to citizens wishing to organize such a group.
- Adopt a local Fair Housing Ordinance or a resolution supporting the state and/or federal law.
- Distribute brochures outlining fair housing law to persons attending community meetings or CDBG Public Hearings.
- Post a fair housing poster at City Hall or Courthouse.
- Require owners of rental property receiving CDBG-DR assisted rehabilitation loans to sign fair housing agreements as a condition of receiving assistance.
- Develop an active public information and educational campaign to promote fair housing awareness in the community.
- Include a discussion of fair housing in public meeting agendas.
- Provide persons relocated to new housing with fair housing information and referrals.

Email Updates

In order to distribute the status updates to elected and appointed officials, local government employees from the impacted counties, and private citizens, the CDBG-DR team worked with DCA's Marketing and Communications Team to create an email-sign up page located on the left-hand side of the CDBG-DR webpage (<https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>). Participants have the option to sign up for one or multiple lists including a specific tab for Hurricane Michael Funding. Participants are also able to select an option to receive communication in Spanish.

Public Notice and Comment Period to Review Draft Action Plan

Prior to finalizing the CDBG-DR Action Plan, DCA will make available to stakeholders, citizens, public agencies and other interested parties information that includes the amount of assistance DCA expects to receive and the range of activities that may qualify, including the estimated amount that will benefit persons of low and moderate income.

DCA will provide public notice and seek feedback for the development of the CDBG-DR Action Plan through emails, website postings, and public meetings. DCA will publish the draft CDBG- DR Action Plan and the time period for public comment on the DCA CDBG-DR Website. The website is linked below:

<https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>

For those who cannot access the draft CDBG-DR Action Plan online, a copy will be made available at DCA Headquarters. Citizens who wish to participate in the planning process are encouraged to contact their local government or reach out to DCA via email at CDBG-DR@dca.ga.gov.

Development of CDBG-DR Action Plan

The State is developing a Disaster Recovery Action Plan that will include:

1. The amount of assistance expected to be received, based on projected amounts provided by HUD;
2. The range of activities that can be undertaken including the estimated amount that will benefit persons of low and moderate income;
3. Plans to minimize displacement of persons and assist any persons displaced;
4. An anticipated time schedule for submission of the Action Plan to the Department of Housing and Urban Development; and
5. Incorporation of and response to public comments received during the public comment period.

Sign up for CDBG-DR updates!

Get news from CDBG-DR in your inbox.

*** Email**

*** First Name**

*** Last Name**

*** Email Lists**

- 2017 Mitigation Funding
- 2017 Mitigation Funding (Spanish)
- 2017 Unmet Needs Funding
- 2017 Unmet Needs Funding (Spanish)
- CDBG-DR General
- CDBG-DR General (Spanish)
- Hurricane Michael Funding
- Hurricane Michael Funding (Spanish)

By submitting this form, you are consenting to receive marketing emails from: Georgia Department of Community Affairs, 60 Executive Park S., NE, Atlanta, GA, 30329, US, <http://www.dca.ga.gov>. You can revoke your consent to receive emails at any time by using the [SafeUnsubscribe!](#) link, found at the bottom of every email. Emails are serviced by Constant Contact.

[Sign Up!](#)

Amendments to the Action Plan

As additional information becomes available and programs evolve through the grant administration process, amendments will be made to the Action Plan in accordance with 85 FR 4681. Updates to the plan may be substantial or non-substantial. Program changes that result in a Substantial Amendment are:

- Addition or deletion of any allowable activity described in the approved Action Plan
- A funding allocation or re-allocation of \$1 million or more
- A change in program benefit, planned beneficiaries, or eligibility

Substantial Amendment(s) will be posted for public comment for a minimum of 30 days. DCA and/or MID area local governments will notify affected citizens through electronic mailings, press releases on websites, and/or social media. A summary of all comments received, and responses provided will be included in the appendices of the final Substantial Amendment submitted to HUD for approval. The HUD-Approved Substantial Amendment will be posted to DCA's public website, in English and Spanish.

Written comments on the initial 2018 Unmet Needs CDBG-DR Action Plan or subsequent substantial amendments to the plan may be submitted to DCA via email at CDBG-DR@dca.ga.gov or mailed to the following address by 5:00 PM EST on the pre-approved date as set forth in the applicable FRN:

Georgia Department of Community Affairs
 Attention: CDBG-DR
 60 Executive Park South, NE Atlanta, Georgia 30329

For non-substantial amendments, DCA will notify HUD but not post for public comment. Each amendment, substantial or not, will be posted to DCA's CDBG-DR public website, not replacing, but in addition to all previous versions of the plan.

Citizen Complaints Process and Procedures

Citizens may file a written complaint or appeal through the CDBG-DR email at CDBG-DR@dca.ga.gov or submit via mail to:

Georgia Department of Community Affairs
 Attention: CDBG-DR
 60 Executive Park South, NE
 Atlanta, GA 30329

DCA's goal is to attempt to resolve all complaints in a manner that is both sensitive to the complainants' concerns and achieves a fair result. DCA will make every effort to provide a timely written response within 15 working days of the receipt of the complaint, where practicable.

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).

Performance Reporting

- In accordance with HUD requirements DCA will submit a Quarterly Performance Report (QPR) through the Disaster Recovery Grant Reporting (DRGR) system no later than 30 days after the end of each calendar quarter. QPR's will be posted to the DCA CDBG-DR public website within three (3) days of submission to HUD each quarter until all funds have been expended and all expenditures have been reported.
- Each QPR will include information about the uses of funds in activities identified in the Action Plan, as entered in the DRGR reporting system. This includes, but is not limited to:
 - Project name, activity, location, and national objective
 - Funds budgeted, obligated, drawn down, and expended
 - The funding source and total amount of any non-CDBG-DR funds to be expended on each activity
 - Beginning and actual completion dates of completed activities
 - Achieved performance outcomes such as number of housing units completed or number of low- and moderate-income persons benefiting
 - The race and ethnicity of persons assisted under direct-benefit activities
 - Amount of funding expended for each contractor identified in the Action Plan
 - Efforts to affirmatively further fair housing made by DCA and Subrecipients

Limited English Proficiency (LEP)

DCA is committed to providing all citizens with equal access to information about CDBG-DR, including persons with disabilities and limited English proficiency (LEP). DCA follows HUD's regulation, 24 CFR Part 1, "Non-Discrimination in Federally Assisted Programs of the Department of Housing and Urban Development-Effectuation of Title VI of the Civil Rights Act of 1964," which requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons.

Persons who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a service, benefit, or encounter. Where a significant number of non-English speakers can be reasonably expected to participate in a public hearing or public comment periods, materials to be handed out will be translated into the appropriate language, citizen comments in a language other than English will be translated, and translator options will be available.

DCA will take reasonable steps to ensure that LEP persons are informed of the availability of the Action Plan and have the opportunity to provide comments. The Action Plans and all amendments (substantial and non-substantial) will be translated into Spanish and posted on Georgia's CDBG-DR webpage at: <https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-7>.

DCA Website Accessibility

DCA's website can be translated into many languages. Below is a screenshot from DCA's website as it is translated into Spanish.

ASISTENCIA DEL GOBIERNO LOCAL

Investigación y encuestas, planificación, mapas, voluntariado, códigos de construcción.

DESARROLLO COMUNITARIO Y ECONÓMICO

Oportunidades de asistencia financiera para las comunidades.

VIVIENDA SEGURA Y ASEQUIBLE

Ayudar a las comunidades a satisfacer las necesidades de vivienda y conectar a las personas con asistencia de vivienda.

Desarrollo comunitario y económico » Programas de financiación » Programa de Recuperación por Desastre en Bloque de Desarrollo Comunitario (CDBG-DR)

Programa de Recuperación por Desastre en Bloque de Desarrollo Comunitario (CDBG-DR)

Información básica
Recursos
Información relacionada

Durante 2017, los eventos climáticos severos causaron daños extensos en muchas partes de nuestro estado, lo que resultó en tres declaraciones presidenciales de un desastre mayor: dos debido a los tornados del suroeste de Georgia y uno a raíz del huracán Irma. A principios de este año, el gobierno federal otorgó a Georgia \$ 64,904,000 en asistencia de recuperación ante desastres para abordar las "necesidades no satisfechas" y la "mitigación" en las áreas dañadas por uno de estos desastres mayores. La financiación se ha puesto a disposición a través del programa de Recuperación por Desastre en Bloque de Desarrollo Comunitario (CDBG-DR) del Departamento de Vivienda y Desarrollo Urbano (HUD), que se enfoca en cubrir "... los gastos necesarios para actividades ... relacionadas con el alivio de desastres, la recuperación a largo plazo, restauración de infraestructura y vivienda, y revitalización económica en las zonas más afectadas y angustiadas ...".

Este financiamiento ahora está disponible para ayudar a las comunidades, algunas de las cuales quedaron completamente devastadas y permanecen inhabitables un año después del hecho. Los condados que recibieron asistencia pública e individual son elegibles para recibir estos fondos.

Se dará prioridad a los fondos para su uso en las áreas más afectadas y angustiadas, para facilitar la recuperación a largo plazo a través de la restauración de infraestructura y vivienda, mitigación para proteger de daños futuros predecibles y revitalización económica. DCA está trabajando activamente con HUD en los detalles del programa, y se coordinará directamente con los gobiernos locales en áreas elegibles para desastres.

Condados elegibles: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, Worth

Atención: el estado de Georgia se dedica a la prevención del fraude, el despilfarro y el abuso. Todos los casos sospechosos de fraude se tomarán en serio y las denuncias se informarán a la Oficina del Inspector General de Georgia para una mayor investigación (866-435-7644, <https://oig.georgia.gov/>).

LAS SOLICITUDES PARA EL PROGRAMA CDBG-DR DEL DCA NO SE ESTÁN RECIBIENDO EN ESTE MOMENTO.

Vivienda justa

Las políticas de Equidad de Vivienda de DCA se pueden encontrar en la siguiente página web: <https://www.dca.ga.gov/fairhousing> . Si necesita más información sobre las políticas de Equidad de Vivienda de DCA, comuníquese con un Coordinador de Equidad de Vivienda de DCA a fairhousing@dca.ga.gov .



CONTACTO
CDBG-DR@dca.ga.gov

¡Regístrese para recibir actualizaciones de CDBG-DR!

Obtenga noticias de CDBG-DR en su bandeja de entrada.

* Correo electrónico

* Nombre de pila

* Apellido

* Listas de correo electrónico

- Financiamiento de mitigación 2017
- Financiación de necesidades insatisfechas 2017
- CDBG-DR General
- Financiamiento del huracán Michael



Asignación de necesidades insatisfechas 2017



Asignación de mitigación 2017



Asignación del huracán Michael



Contratos

Section 508 Accessibility

DCA's website complies with Section 508 of the Rehabilitation Act of 1973, making content accessible to people with disabilities. Section 508 requires that anyone with disabilities must be able to access and use information and data on a website, comparable to the way people without disabilities can get that information and data, unless it would cause our agency an undue burden.

If you use assistive technology (such as a screen reader, Braille reader, etc.) and have problems accessing information on our website, please contact CDBG-DR@dca.ga.gov and tell us about your problem. Be sure to include the URL (web address) of the material you tried to access and your contact information. We will try to provide the information you are seeking.

Provision of Language Access Services

All programs with direct contact with the public are responsible for providing written or oral language services. "I Speak" cards are used by all staff who may have direct interaction with LEP individuals to identify language needs and begin the provision of access services.

Plan for Providing Interpreters and Spoken Translation

For oral encounters, program staff have access to three contracted translation service providers that can interpret program information into the applicant's native language:

- Interpreters Unlimited (In person only – 800-726-9891)
- Language Line Services (Telephonic or recording – 800-752-6096)
- LATN, Inc. (In-person or telephonic – 800-943-5286)

The program applicant will identify him/herself as an LEP individual. By way of this designation, public-facing program staff are instructed to call a toll-free number and assist applicants with the help of the telephone operator and interpreters available through this service.

DCA will partner with organizations to develop additional translating resources for written materials.

Plan for Providing Language Access Services to Meeting Participants and Attendees

DCA and Subrecipients will leverage the contracted translation services or bilingual staff to provide interpretation services as needed for all meetings related to program eligibility determinations. DCA is committed to providing interpreters for large, medium, small, and one-on-one DCA meetings with any LEP individuals or organizational representatives as needed and as appropriate.

DCA will include a statement in its meeting notices indicating that 1) DCA is prepared to provide appropriate language services for LEP individuals and 2) requesting that the respondent identify any language services needed within a specified period of time, including which language(s) such services are required.

DCA's ability to provide an in-person interpreter upon request is limited by available resources and the scheduling availability of the translation service(s). DCA will provide interpretation services in a meeting in the following manner:

- If the meeting is small (less than 10 people), telephone interpreter services will be provided.
- If the meeting is medium (11-20 people) or large (21 or more people), an in-person interpreter will be provided upon request.

When the meeting is off-site and/or open to the public, DCA will include the sentence, "Translation of the notice and interpretation services for this event are available upon request" in both Spanish and English in communication about the meeting.

Appendix B: Action Plan Certifications

Brian P. Kemp
Governor



Christopher Nunn
Commissioner

CDBG-DR Grants under Public Laws 115-254 and 116-20

- 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, 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 administered 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 91.105 or 91.115, as applicable (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. Each State receiving a direct award under this Notice 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 method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and

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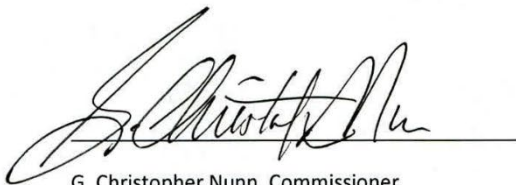
distressed areas for which the President declared a major disaster in 2018 and 2019 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

- (2) With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - (3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.
 - (4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- i. The grantee certifies that it grant will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and 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. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
 - (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - (2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
 - k. Each State receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a under Section VI and its Implementation Plan and Capacity Assessment and related submission to HUD referenced at A.1.b under Section VI.
 - l. The grantee will not use grant 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 recent 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 plan 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.



G. Christopher Nunn, Commissioner
Georgia Department of Community Affairs

4-23-20


Date

Appendix C: SF-424

OMB Number: 4040-0004
 Expiration Date: 10/31/2019

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"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: Georgia Department of Community Affairs		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 58-1259426	* c. Organizational DUNS: 807479084	
d. Address:		
* Street1: 60 Executive Park South NE	<input type="text"/>	
Street2:	<input type="text"/>	
* City: Atlanta	<input type="text"/>	
County/Parish:	<input type="text"/>	
* State: GA: Georgia	<input type="text"/>	
Province:	<input type="text"/>	
* Country:	<input type="text"/>	
* Zip / Postal Code: 30329	<input type="text"/>	
e. Organizational Unit:		
Department Name: Grant Administration	Division Name: Community Finance Division	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.	* First Name: Tommy	<input type="text"/>
Middle Name:	<input type="text"/>	
* Last Name: Lowmon	<input type="text"/>	
Suffix:	<input type="text"/>	
Title: Director, CDBG-DR Program		
Organizational Affiliation:		
<input type="text"/>	<input type="text"/>	
* Telephone Number: 404-977-0929	Fax Number:	
<input type="text"/>	<input type="text"/>	
* Email: tommy.lowmon@dca.ga.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: <input type="text"/>
Type of Applicant 3: Select Applicant Type: <input type="text"/>
* Other (specify): <input type="text"/>
* 10. Name of Federal Agency: Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number: 14.228 CFDA Title: <input type="text"/>
* 12. Funding Opportunity Number: 85 FR 4681 * Title: CDBG-DR 4400
13. Competition Identification Number: NA Title: <input type="text"/>
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
* 15. Descriptive Title of Applicant's Project: CDBG- DR PL 116-20
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	2, 8, 12
* b. Program/Project	2, 8, 12
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	10/10/2021
* b. End Date:	10/10/2027
18. Estimated Funding (\$):	
* a. Federal	41,837,000
* b. Applicant	0
* c. State	0
* d. Local	0
* e. Other	0
* f. Program Income	0
* g. TOTAL	
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	Mr.
* First Name:	G. Christopher
Middle Name:	
* Last Name:	Nunn
Suffix:	
* Title:	DCA Commissioner
* Telephone Number:	404-679-0585
Fax Number:	
* Email:	christopher.nunn@dca.ga.gov
* Signature of Authorized Representative:	
* Date Signed:	

Appendix D: MID Expansion Request

Brian P. Kemp
Governor



Christopher Nunn
Commissioner

April 14, 2020

Mr. Marvie Epps
Community Planning & Development Disaster Recovery Specialist
Office of Block Grant Assistance
U.S. Department of Housing and Urban Development
451 7th Street, SW, Room 7272
Washington, D.C. 20410

Dear Mr. Epps,

The Georgia Department of Community Affairs (DCA) is formally requesting the designation of additional zip codes as Most Impacted and Distressed areas for Georgia's 2018 CDBG-DR allocation. Currently, there is only one MID zip code, 39845. While conducting outreach meetings on February 4-5, 2020 and reviewing data for the Action Plan, it became apparent there were considerable unmet needs stemming from Hurricane Michael in zip code 31705 (Dougherty County) and 39819 (Decatur County).

DCA is currently drafting the Action Plan for the 2018 Unmet Needs Allocation. Upon completion, DCA will post the plan for public comment and submit for HUD review and approval after this period. If this expansion request is approved, DCA will amend the HUD-Approved Action Plan to include the additional zip codes.

DCA has prepared this request in accordance with guidance provided in 85 FR 4681. The pages following this letter contain data to substantiate the need. Thank you for your consideration of this request. If you have any questions or require additional information, please call 404-977-0949 or email tommy.lowmon@dca.ga.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tommy Lowmon".

Tommy Lowmon
Director, CDBG-DR Program

CC: Mr. William Bedford, Assistant Director- ATL, Disaster Recovery and Special Issues Division, HUD

Enclosures

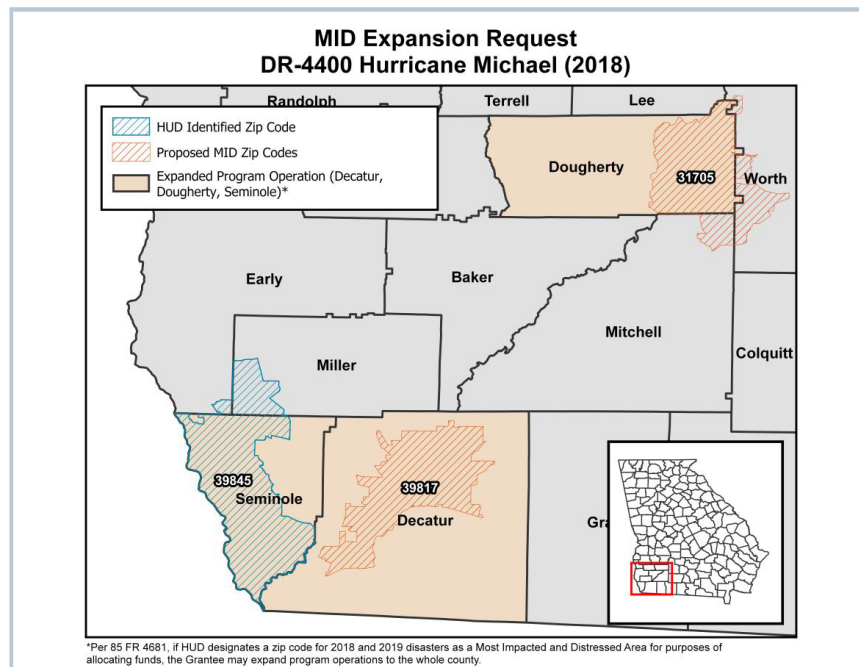
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MID Expansion Data | 2018 CDBG-DR Allocation

DCA gathered data from FEMA, GEMA/HS (Georgia Emergency Management and Homeland Security Agency), and SBA in order to understand where the greatest concentration of impact from Hurricane Michael occurred. The 2018 Presidential Disaster Declaration made 20 counties eligible for FEMA’s Individual and Public Assistance. Consequently, these 20 counties are eligible for CDBG-DR funds pursuant to Federal Register Notice 85 FR 4681. HUD identified \$2,827,960 in serious unmet housing needs, \$8,929,736 in serious unmet business need, and \$30,079,788 in infrastructure needs. Considering these needs, HUD allocated \$41,837,000 to the State of Georgia. With this allocation, HUD designated one zip code, 39845 in Seminole County, as a Most Impacted and Distressed (MID) area. The State of Georgia is required to expend a minimum of 80% of the allocation, or \$33,470,000, within the HUD-Identified MID Areas. While this area suffered tremendous damage, a preliminary estimate from the community of unmet infrastructure needs is \$10.5M. Though the needs of zip code 39548 (Seminole County) are substantial, the hurricane affected additional zip codes that also need access to these resources.

A zip code must have \$2M in serious unmet housing needs and a county must have \$10M in serious unmet housing needs to be designated a MID area. However, communities that desperately need assistance were unable to meet these thresholds due to the several factors. First, the State of Georgia has 159 counties that are geographically small, and the counties in Southwest Georgia have low population densities, making it difficult for counties to meet the MID threshold requirements. Moreover, Hurricane Michael occurred in an area of the state that has severely depressed home values that detract from the total amount of damage calculated. After consideration of these factors, DCA used the data in Table 1 and the maps on the following pages to create a methodology in order to determine which areas need greater access to funds through the MID designation. In addition to zip code 39548 in Seminole County, the two communities that have the greatest needs are Zip Code 39817 in Decatur County and 31705 in Dougherty County, as seen on the map below. Following guidance from the FR Notice, DCA would like to include the entire county as a MID with respect to its most impacted zip code.

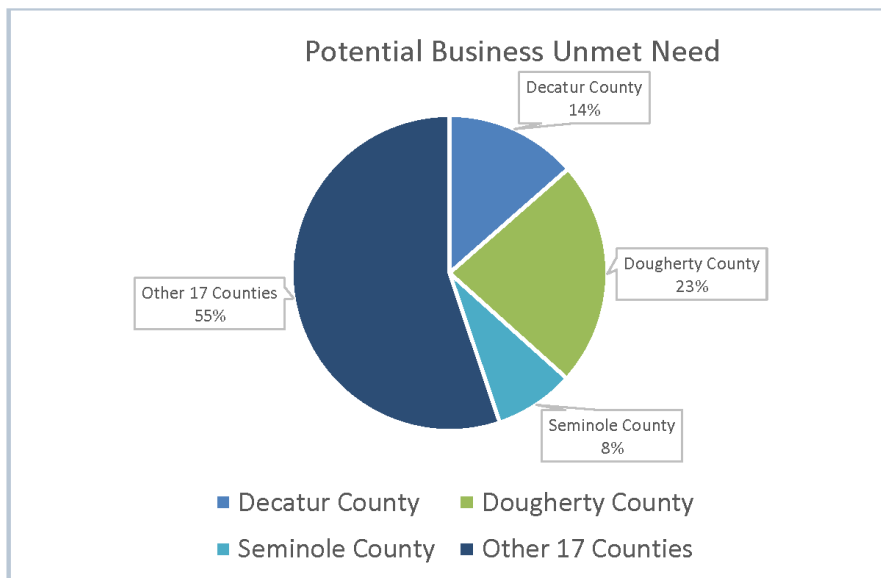
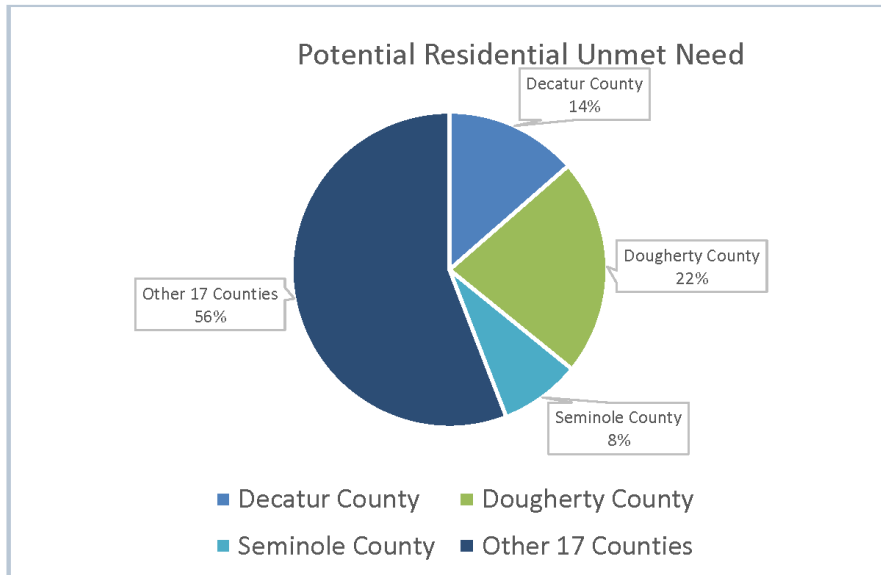


As seen in Table 1 below, Seminole County, Dougherty County, and Decatur County are the top three ranking communities within each of the unmet needs categories. Column 1 shows the unmet needs stemming from SBA declined or withdrawn applications. The number of declined or withdrawn applications was multiplied by the average SBA loan amount within the 20-county affected area (\$22,736). As seen in Columns 1 and 2, the unmet housing need in Dougherty County and Decatur County exceed that in Seminole County, an existing MID. Column 1 applicants are considered to have unmet needs because they applied for the loan for assistance, but were unable to obtain funds. Column 2 is a calculation of unmet needs, because the people were referred by FEMA to SBA to meet a need, but for some reason they did not apply for a loan. There are several likely reasons this could occur. The person could have thought their credit or income was not high enough to be approved for a loan, or the person may not have the means to repay a loan. Column 3 shows the unmet needs as calculated by the number of declined SBA business applicants multiplied by the average SBA business loan (\$54,563.58). Likewise, Column 4 shows the unmet needs amount calculated by multiplying the number of FEMA Referrals for SBA business loans that did not apply.

The total potential unmet need in the residential and business sectors in Decatur County and Dougherty County is \$241,082,463.

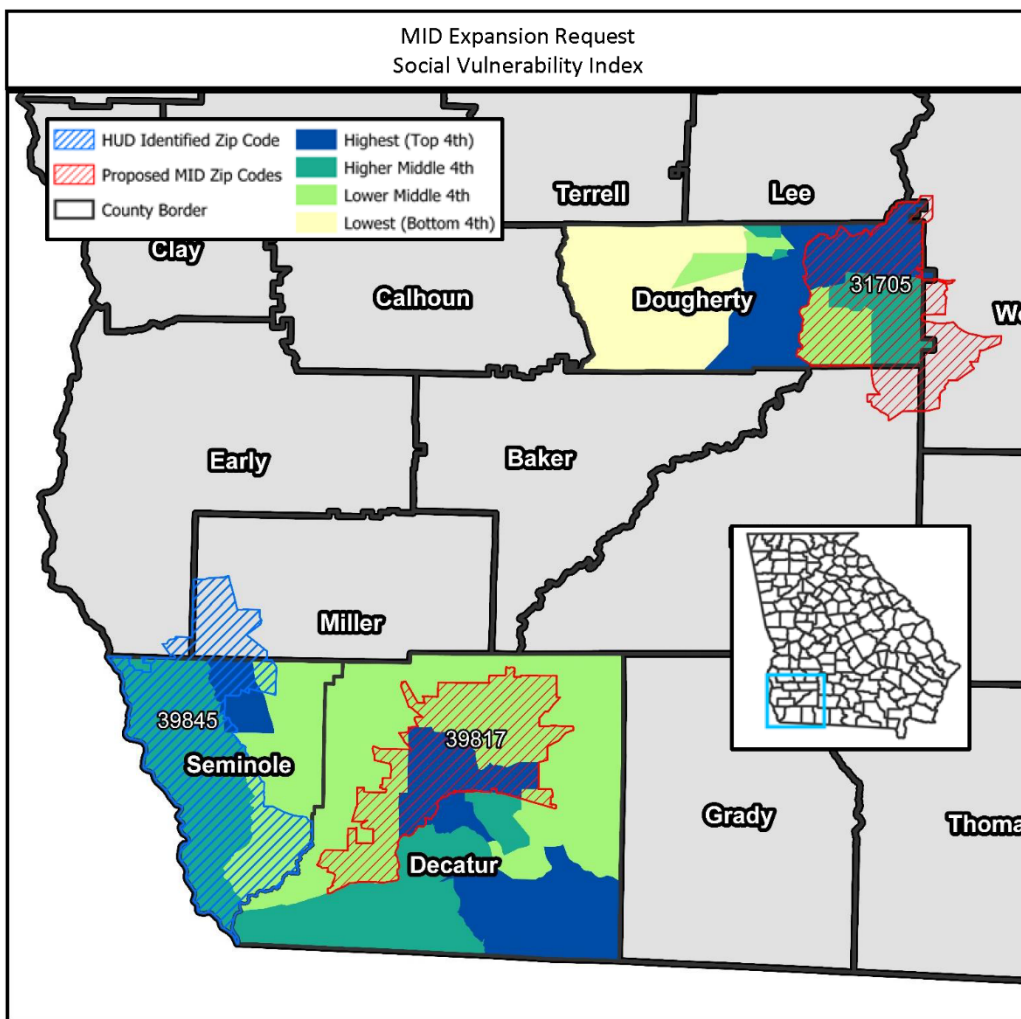
Table 1: Potential Unmet Needs				
Rank	SBA Declined Loans	FEMA Referrals to SBA, Did not apply x multiplier	Declined SBA Applicants x multiplier	FEMA Referrals to SBA, Did not apply x multiplier
	<i>Residential</i>	<i>Residential</i>	<i>Business</i>	<i>Business</i>
1	Dougherty \$20,462,400	Dougherty \$77,438,070	Dougherty \$9,821,444	Dougherty \$42,886,971
2	Decatur \$11,549,888	Decatur \$48,040,706	Decatur \$4,092,268	Decatur \$26,790,716
3	Seminole \$7,161,840	Seminole \$29,238,215	Seminole \$2,946,433	Seminole \$15,714,310
4	Mitchell \$6,366,080	Mitchell \$27,805,860	Crisp \$2,509,924	Mitchell \$14,950,420
5	Early \$4,865,504	Lee \$22,372,009	Lee \$2,182,543	Early \$13,149,822

The following charts illustrate how the proposed MID areas (Decatur County and Dougherty County) and the existing MID (Seminole County) rank in comparison to the remaining 17 counties. As seen below, in both residential and business unmet needs, these three communities make up almost half (44% and 45%) of the total unmet need.



Social Vulnerability Index

CDC's Social Vulnerability Index uses 15 U.S. census variables at tract level to help local officials identify communities that may need support in preparing for hazards or recovering from disaster. According to the Centers for Disease Control, a number of factors, including poverty, lack of access to transportation, and crowded housing may weaken a community's ability to prevent human suffering and financial loss in a disaster. These factors are known as social vulnerability. As seen on the map below, the higher the score the more socially vulnerable a community is. Both proposed MID zip codes have Census Tracts that fall within the most socially vulnerable category. Dougherty County contains some areas that are less socially vulnerable, however these are outside of the proposed MID zip code.



Conclusions

Expanding the Most Impacted and Distressed Areas to include zip codes 31705 and 39817 is vital for the communities. Dougherty County, a HUD-Identified MID for Georgia's 2017 CDBG-DR Allocation, was severely impacted from tornadoes in 2017. Back-to-back disasters has made it extremely difficult to recover. Decatur County, a community of 26,716 people, suffered tremendous residential damage and very much needs assistance. According to 84 FR 45838, 80% of the State of Georgia's allocation must be spent within the MID areas. If the MID area is not expanded to include these communities, the remaining 20% of the funds (\$8,367,400) will not be enough to address the needs in the communities to help the residents recover and move forward.

MID Areas	\$33,469,600	80%
20 County IA & PA Declared Counties	\$8,367,400	20%
Total	\$41,837,000	100%

Appendix E: Action Plan Comments and Responses

Comment Received: 5/3/2020 – Edward Trout

Greetings Tommy, On behalf of Seminole county. I have a few questions in regards to page 88, the request to consider a sharing of funds that would otherwise be made available exclusively (80%) to area code 39845 (Seminole County). These new numbers do not coincide with the original numbers provided. In Fact they are extremely different. Assuming they were based on the original factual estimates just 2 months ago how did they change that much? It is understood that these original estimates of loss would reflect some sort of comparison to what could be expected in unmet needs.

Considering there is an approval for including Daugherty and Decatur counties in the 80% allotment, what might be the percentages of distribution between the three? would it be distributed evenly say 33.3percent, or would it be based on page 90, table 1 unmet needs? Based on this new table Daugherty County for instance would receive over 50% of the allotment. Please define the intent of your request. Also please explain the difference in the original SBA and FEMA Numbers that were provided in the Power Point Presentation we attended in February. Thank You

Seminole 39845

Daugherty 31705

Decatur 39819

Original Estimates

Owners with SBA Verified Loss >\$0				
Rank	Zip Code	Applicants in Zip	SBA Ver. Loss (Above \$0)	% of Total SBA
1	39845	220	\$11,360,398.00	12.54%
2	31721	207	\$7,284,830.00	8.04%
3	31705	235	\$6,111,018.00	6.74%
4	39819	145	\$5,635,303.00	6.22%
5	39837	129	\$5,592,602.00	6.17%
6	31763	170	\$5,082,827.00	5.61%
7	39817	148	\$4,852,717.00	5.36%
8	39823	110	\$3,936,314.00	4.34%
9	31730	99	\$3,188,820.00	3.52%
10	31701	94	\$2,878,470.00	3.18%
Top 10 Totals		1557	\$55,923,299.00	61.72%
Overall Totals		2756	\$90,602,422.00	100%

Owners with FEMA Verified Loss (FVL) >\$0				
Rank	Zip Code	Applicants in Zip	FVL (Above \$0)	% of Total FVL
1	39845	1001	\$3,309,633.57	16.01%
2	39837	606	\$1,606,774.47	7.77%
3	31705	682	\$1,246,820.66	6.03%
4	39823	545	\$995,902.11	4.82%
5	31721	409	\$937,170.40	4.53%
6	31763	399	\$837,828.28	4.05%
7	39817	590	\$819,668.00	3.96%
8	39819	436	\$797,939.99	3.86%
9	31791	315	\$716,232.81	3.46%
10	31730	538	\$698,108.77	3.38%
Top 10 Totals		5521	\$11,966,079.06	57.88%
Overall Totals		11721	\$20,672,780.28	100%

New Estimates

Table 1: Potential Unmet Needs				
Rank	SBA Declined Loans	FEMA Referrals to SBA, Did not apply x multiplier	Declined SBA Applicants x multiplier	FEMA Referrals to SBA, Did not apply x multiplier
	<i>Residential</i>	<i>Residential</i>	<i>Business</i>	<i>Business</i>
1	Dougherty \$20,462,400	Dougherty \$77,438,070	Dougherty \$9,821,444	Dougherty \$42,886,971
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5	Early \$4,865,504	Lee \$22,372,009	Lee \$2,182,543	Early \$13,149,822

DCA Response: 5/20/2020

Thank you for your comments. The tables provided below are two very different ways of looking at the data. The first two tables below are raw data. In terms of the MID Expansion Request, we looked at the numbers in regards to unmet needs. To determine unmet needs we used multipliers to get an estimate.

There is a requirement that 80% of the allocation be spent within the MID Area. If the two zip codes are approved for inclusion, they would be eligible for part of the 80%. This does not mean the three zip codes would receive a predetermined share of the 80%. Funds will be awarded based on need for the Homeowner Rehabilitation Program (residents will be the applicants), Workforce Development Program (citizens will be the applicants), and Small Business Loan Program (Businesses will be the applicants). Awards to local governments for the infrastructure program will be made based on the competitiveness of the applications.

Comment Received: 5/20/2020 – Edward Trout

Please explain thoroughly the multiplier approach

DCA Response: 5/22/2020

To assist in determining the residential unmet needs we used the average SBA home loan amount. For business unmet needs we used the average SBA business loan amount. For more information regarding the multipliers and the overall calculations, please refer back to the MID Expansion Request that was included as an appendix to the Draft Action Plan.