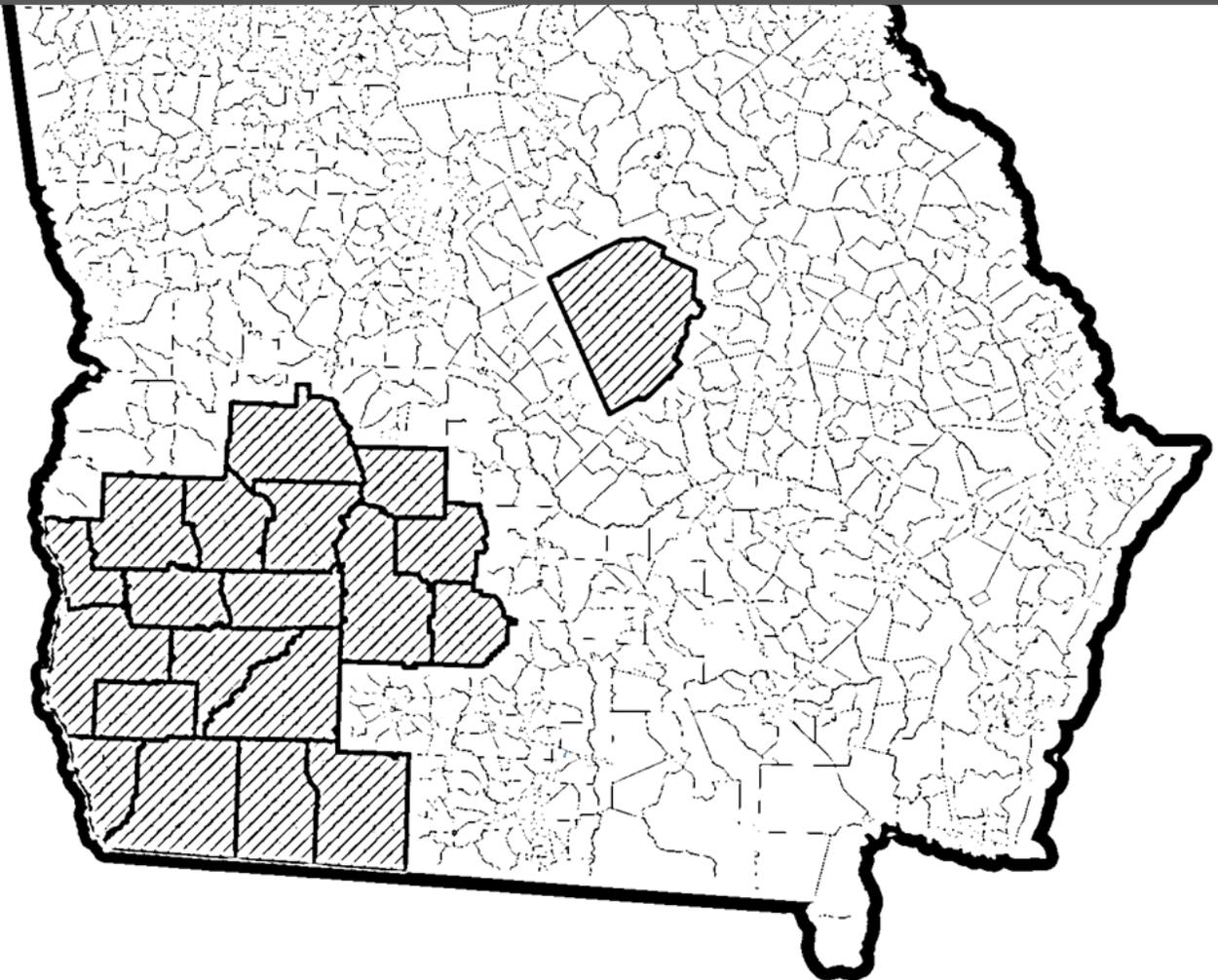




# State of Georgia Action Plan for Disaster Recovery



To be submitted to the U.S. Department of Housing and Urban Development (HUD) on June 2, 2020 to fulfill requirements related to Community Development Block Grant Disaster Recovery (CDBG-DR) Funds in Response to Disaster DR-4400.

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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.

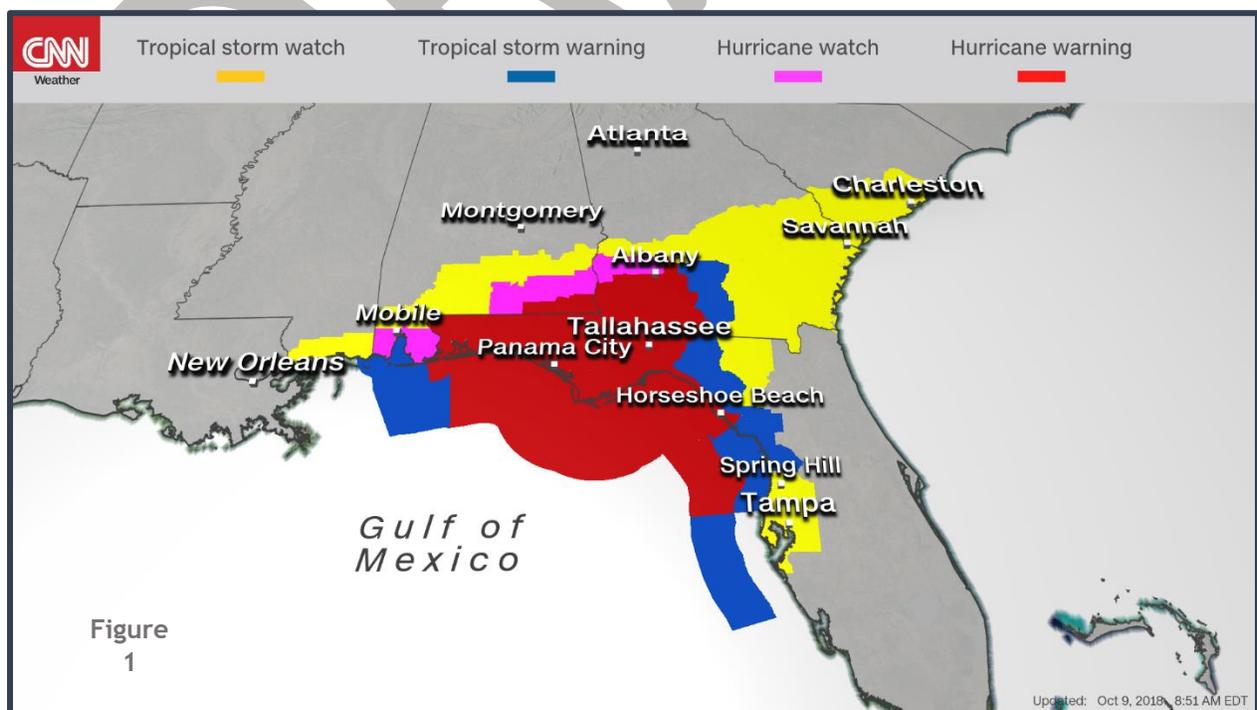
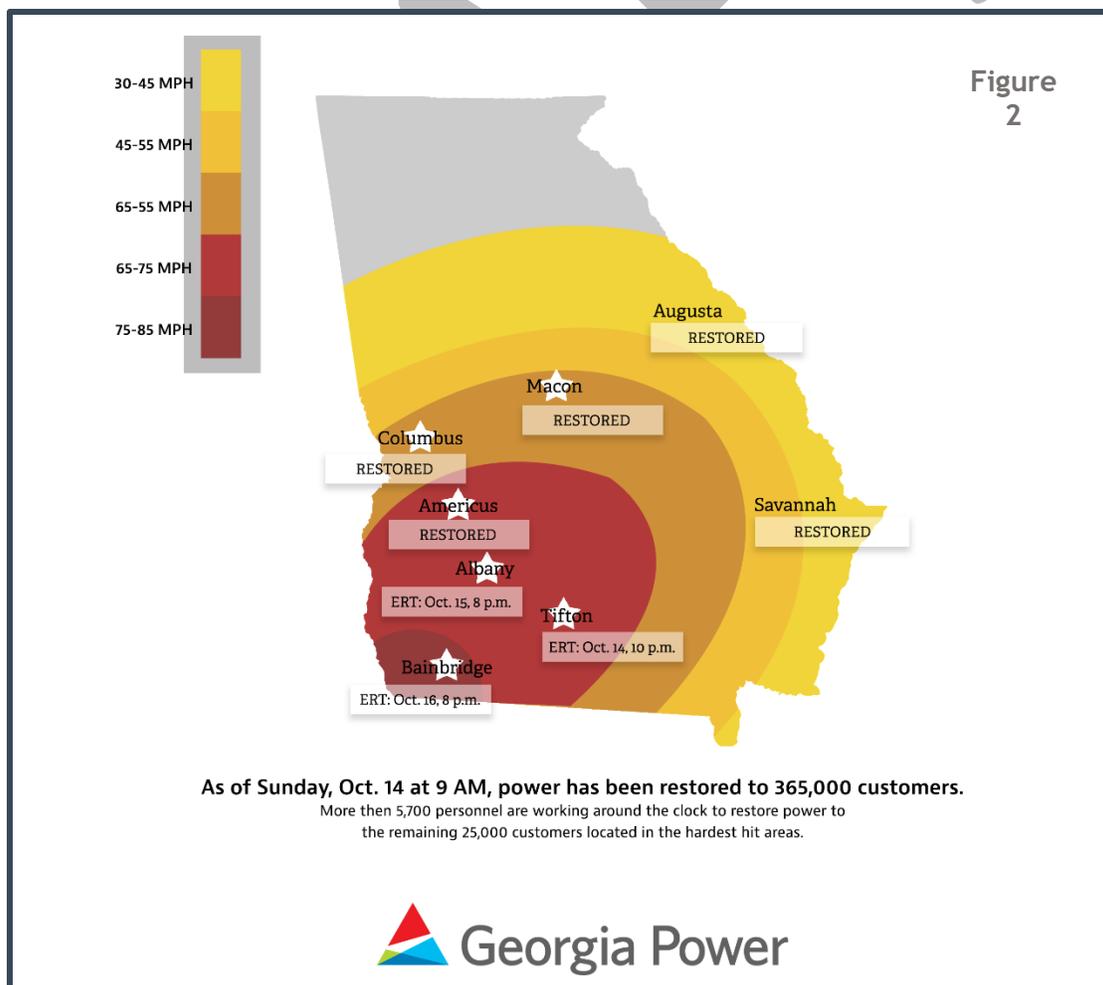


Figure  
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Although the hurricane moved swiftly through Georgia, the storm left behind a vast amount of damage and debris. According to the National Hurricane Center Tropical Cyclone Report prepared by NOAA, a swath of major wind damage to both structures 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.

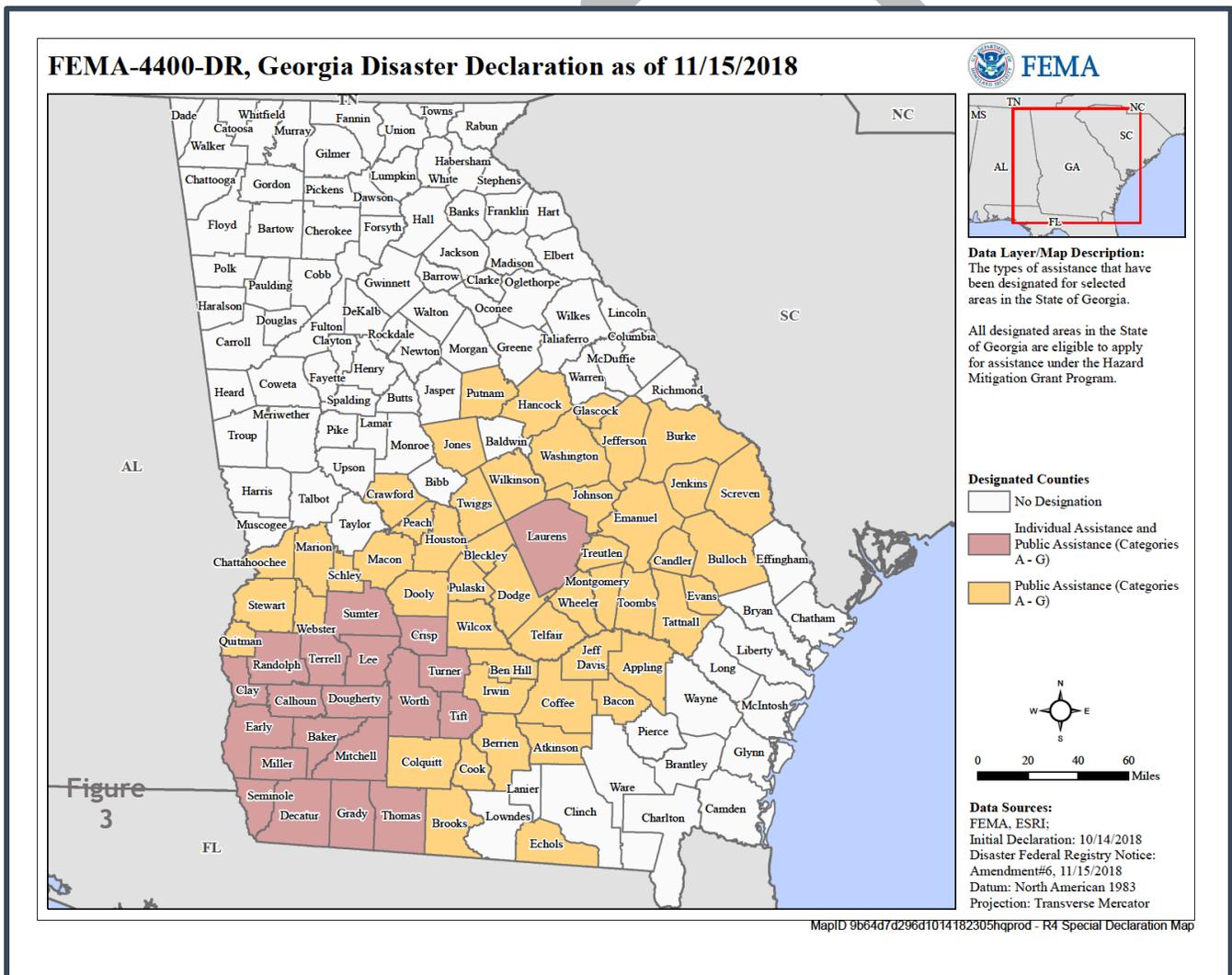
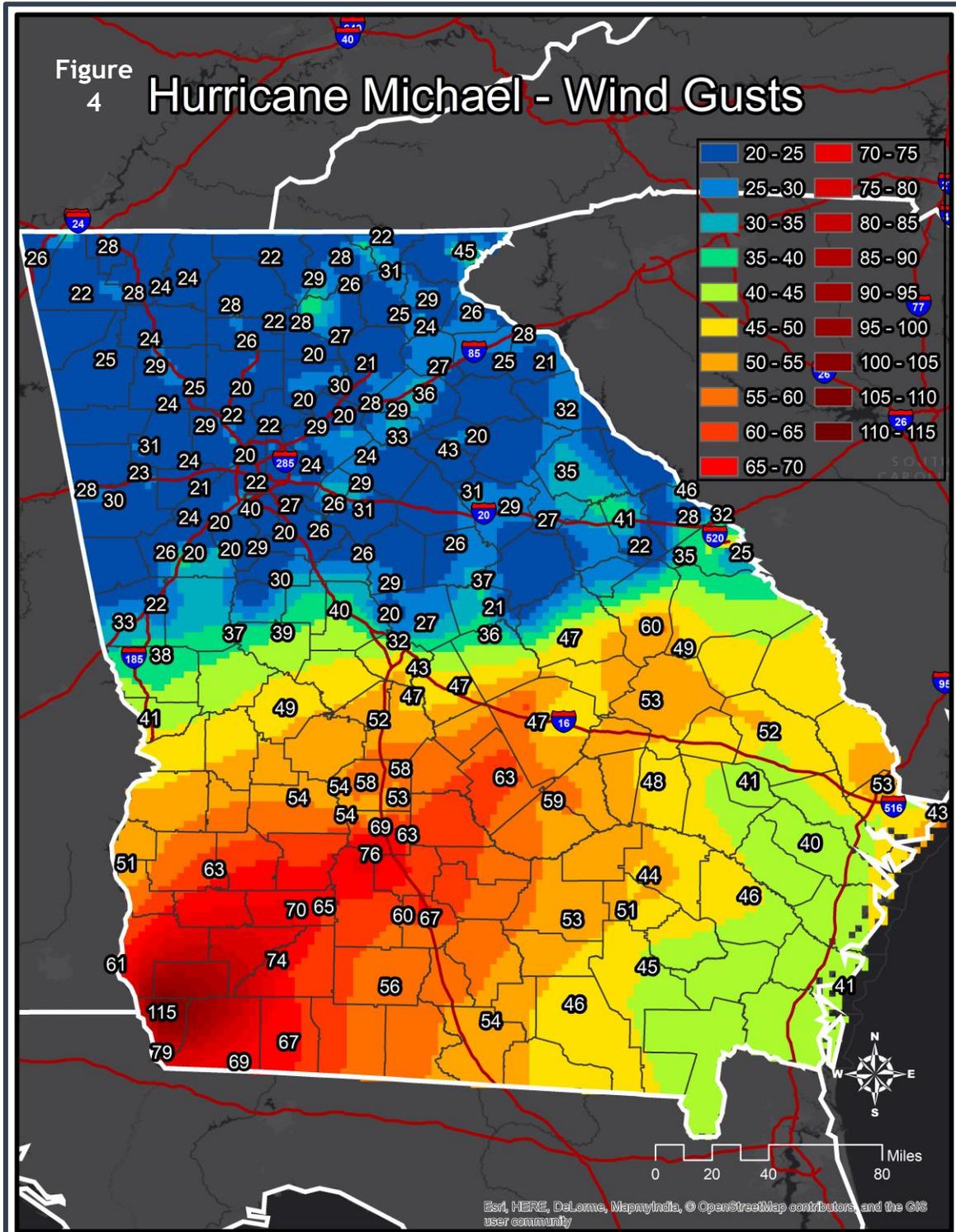


Figure 3

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



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.



## 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

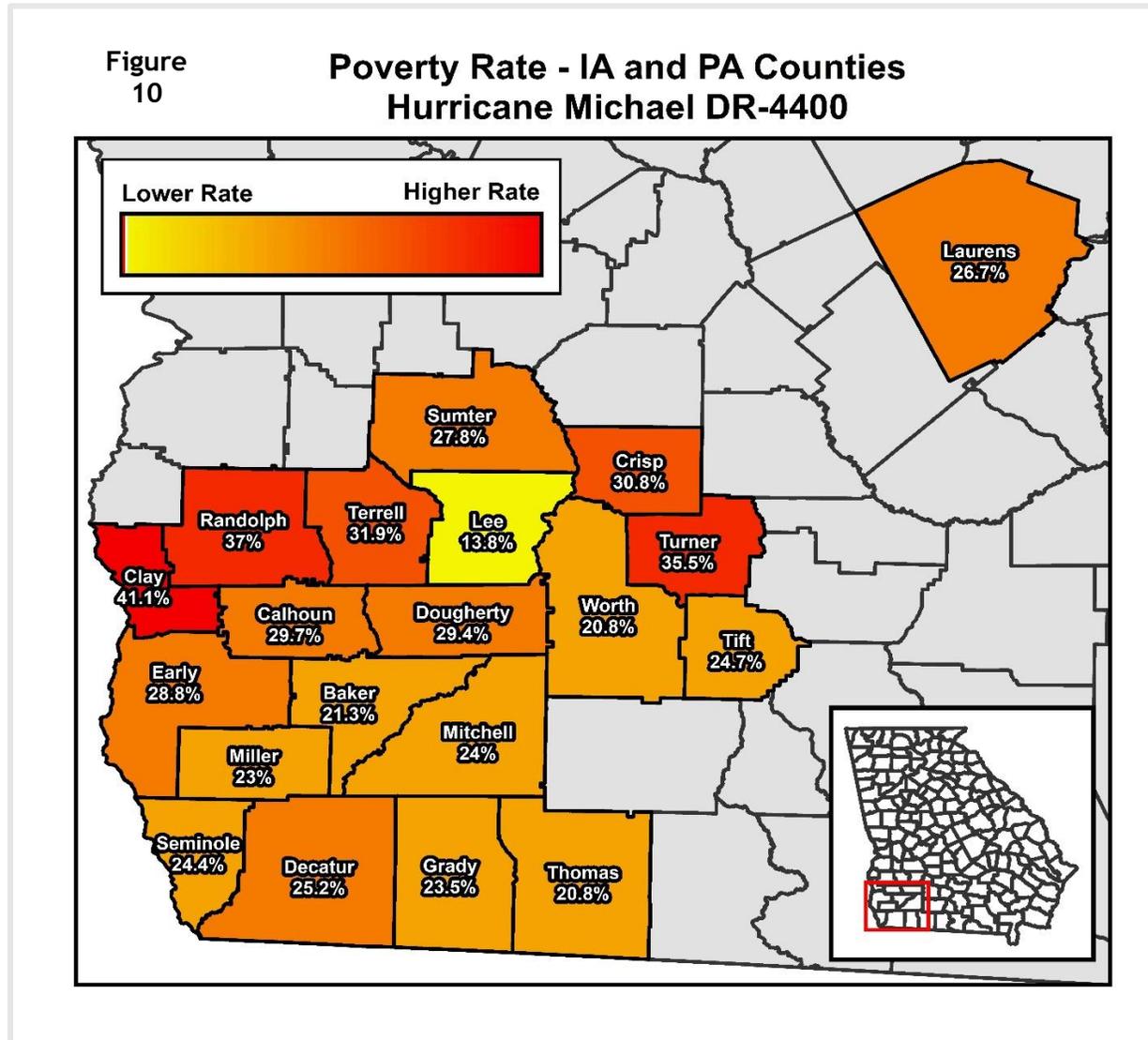
After Hurricane Michael, twenty counties in rural Southwest Georgia were presidentially declared eligible to receive Individual Assistance (IA) and Public Assistance (PA) from FEMA. This 20 county region overall is less populated and exhibits higher poverty rates than the State of Georgia. This section 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.

Figure 9: Median Household Income and Poverty by County (ACS 2014-2018)

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: 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.

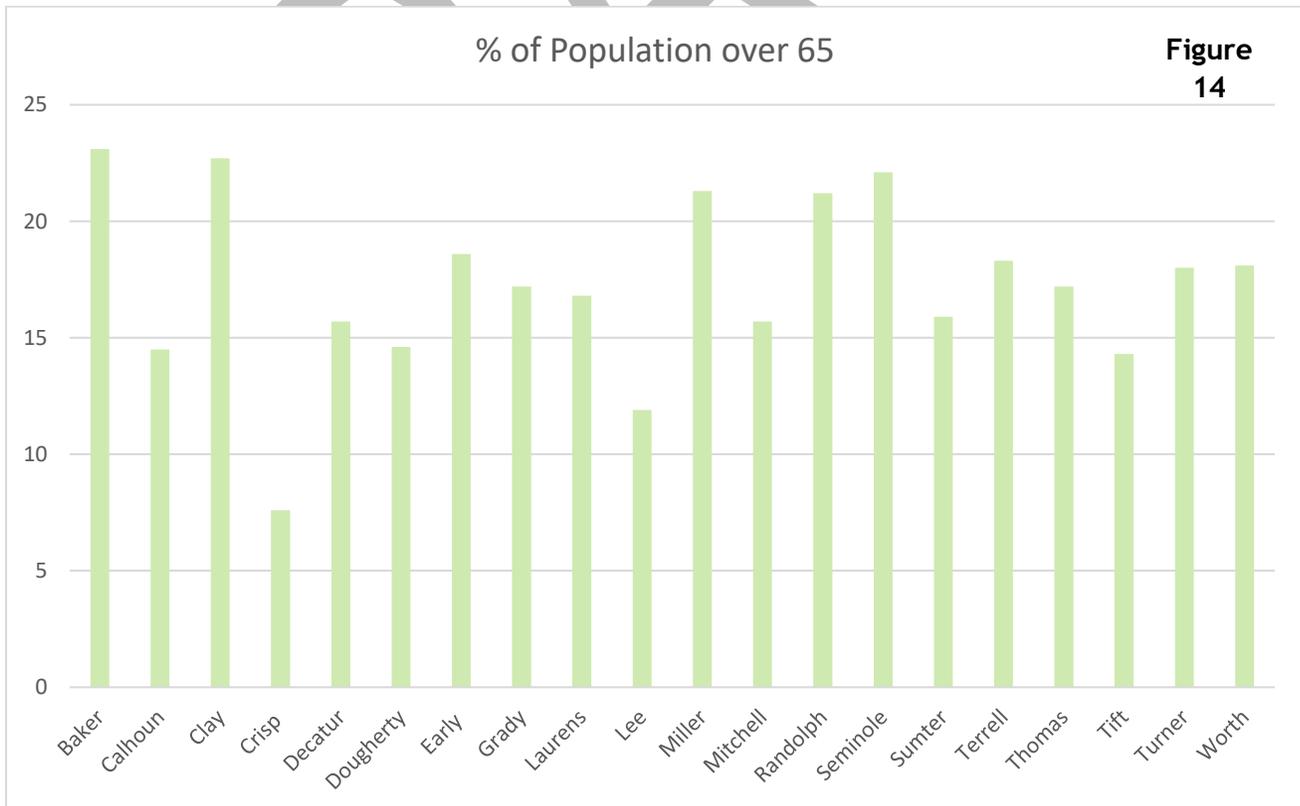
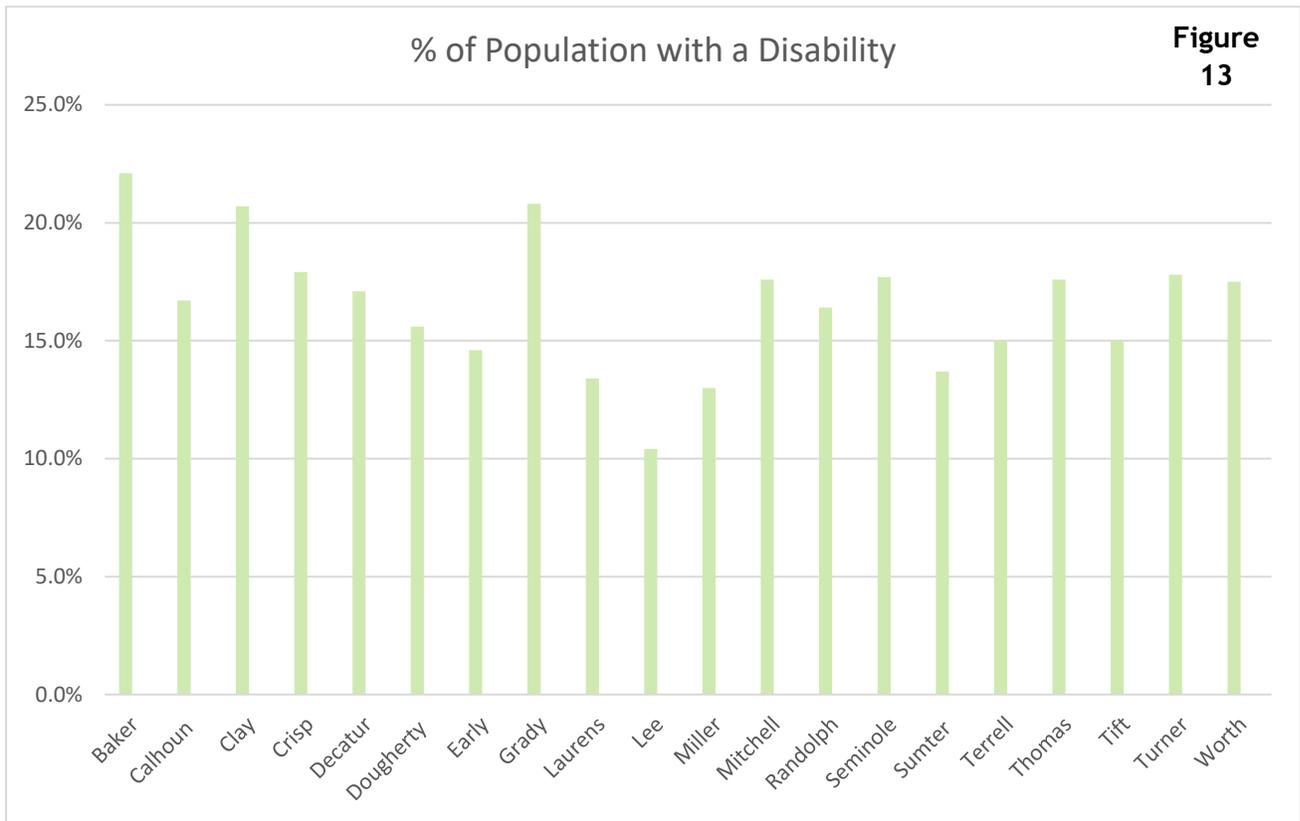
Figure 12: Population Statistics by County (ACS 2014-2018)

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%.

As seen in Figure 12, the greatest concentrations of persons with a disability are within Baker County (22.1%), Clay County (20.7%), and Grady County (20.8%). The rural nature of the affected counties makes it increasingly difficult for disabled persons to access food, healthcare, and emergency services. In the aftermath of disaster, these persons are often unable to seek additional assistance due to the barriers between them and accessing the services. For example, persons with a disability may be less likely to leave their home to apply for FEMA or SBA assistance. For this reason, these persons are considered vulnerable populations with higher risks and greater needs.

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.



## 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 15: 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 15, 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 15 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.

Figure 16: Housing Units by County

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

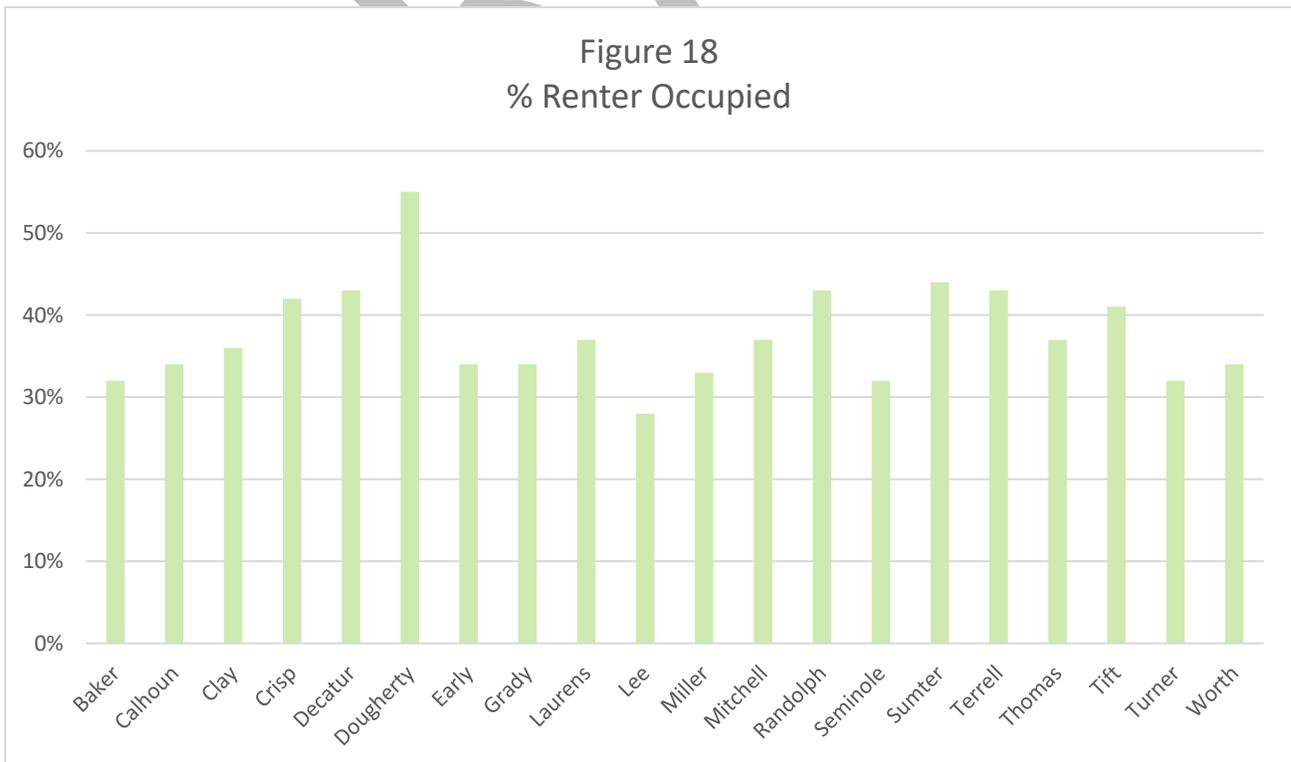
As shown in Figure 16, all 20 of the declared counties have greater than 60% occupied housing units. Occupied homes are more likely to be maintained than those that are unoccupied. Homes that are not maintained contribute to blight and increased safety hazards. However, in counties with low percentages of vacant homes, there may be a lack of available housing for those displaced by disaster.

**Figure 17: 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 17 shows the number of renters and percentage of rental households by county. Figure 18 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 \*\*). 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.

Figure \*\*: Point in Time Homeless Count

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

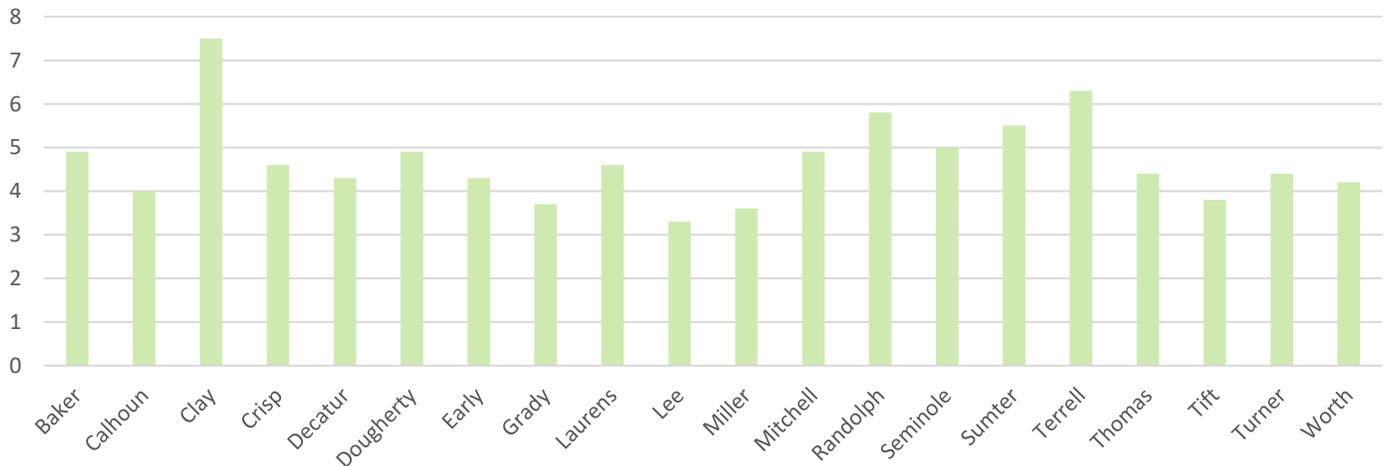
Assistance to people experiencing homelessness is provided through Georgia's Continuum of Care (CoC) network. There are eight CoC's in the state that serve local areas. The Southwest Georgia Community Action Council, Inc. serves 16 of the 20 counties within the affected area. The Council serves the following 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 19: 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 20**  
Avg. Unemployment Rates Aug. 2018- Aug. 2019

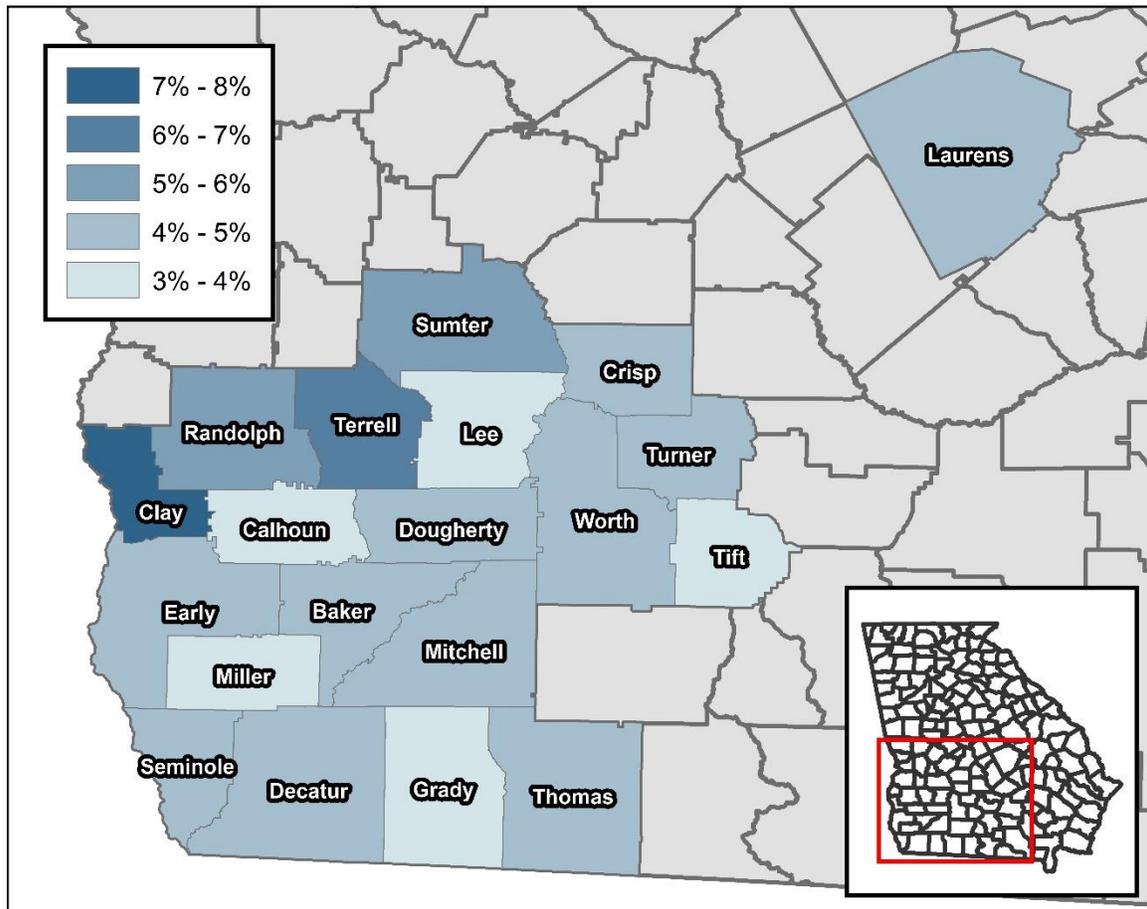


Between August 2018 and August 2019, 18 of the 20 counties declared eligible for FEMA’s Individual and Public Assistance had an equal to or higher rate of unemployment than the state average. Figures 19 and 20 list unemployment percentages each month as well as an average from August 2018 to August 2019. The percentages in green in Figure 19 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 21

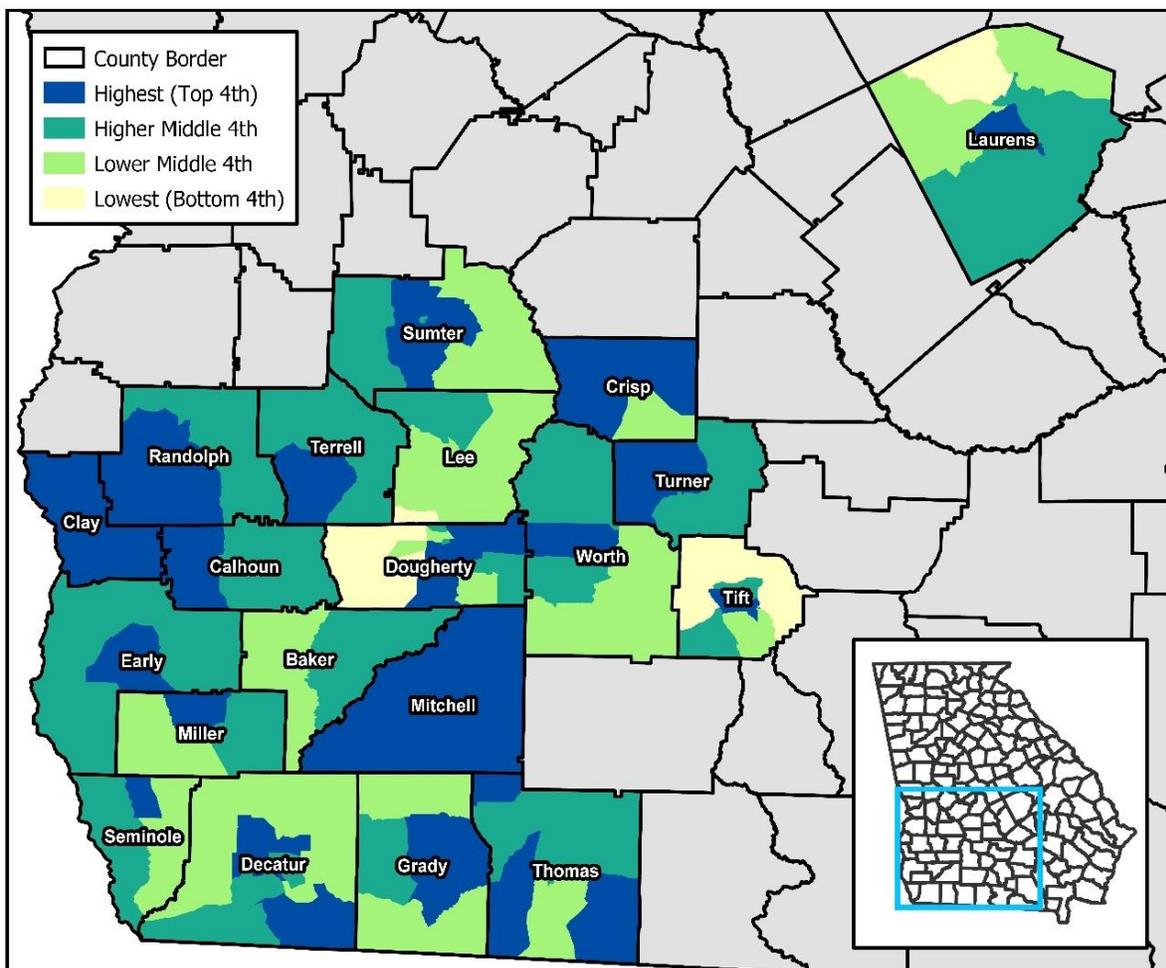
### Average Unemployment Percent of IA and PA Counties 8/1/2018 - 8/1/2019, DR-4400



## 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 22, 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.

**Figure 22 Social Vulnerability Index - Hurricane Michael, DR-4400**



## 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 \*\*\*, 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 \*\* 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 \*\* 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 ***: Survey Response Question 1			Figure ***: Survey Response Question 8		
Category	Responses Rank 1	Percent	Category	Responses Rank 8	Percent
Workforce Development	17	34.69%	Broadband Access	15	32.61%
Housing	11	22.45%	Blight	12	26.09%
Blight	8	16.33%	Access to Infrastructure Funds	9	19.57%
Leadership Development	6	12.24%	Downtown Development	4	8.70%
Access to State & Fed Econ Dev Funds	2	4.08%	Leadership Development	3	6.52%
Access to Infrastructure Funds	2	4.08%	Housing	2	4.35%
Broadband Access	2	4.08%	Access to State & Fed Econ Dev Funds	1	2.17%
Downtown Development	1	2.04%	Workforce Development	0	0.00%

**FIGURE \*: WEIGHTED RANKING OF RESPONSES**



## 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.

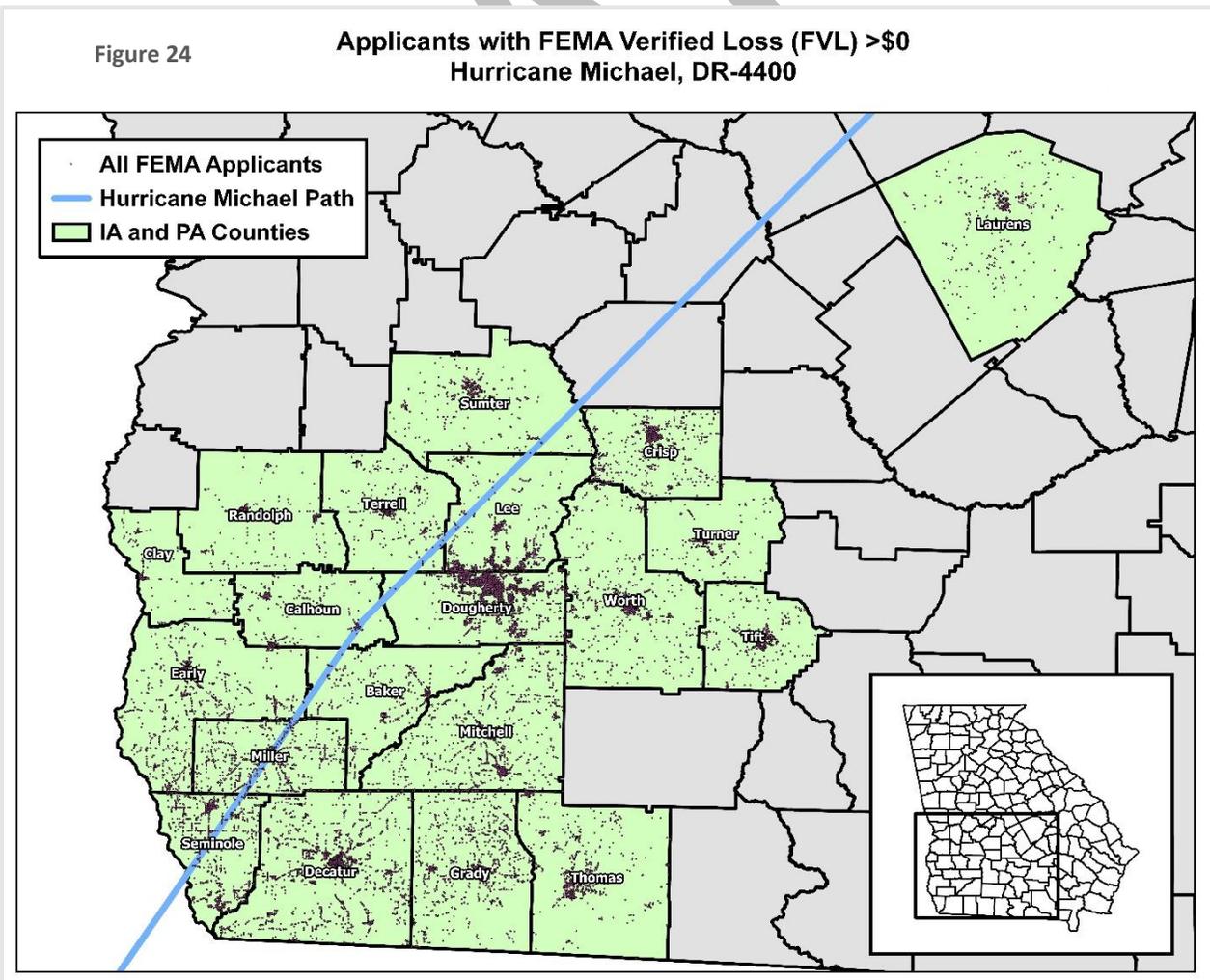
#### Housing - FEMA Individual Assistance Data

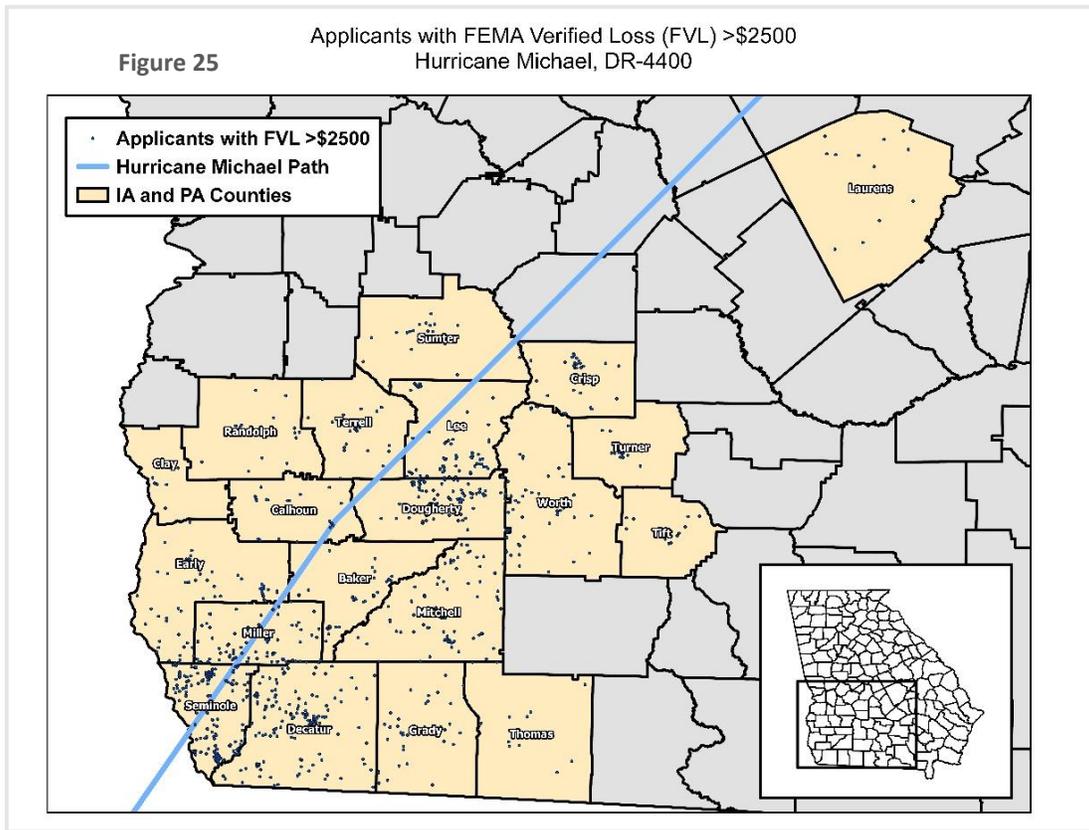
DCA analyzed several sets of data in order to gauge the housing impact caused by Hurricane Michael. These sets include data from FEMA and SBA home loan data. The total number of FEMA applicants within the presidentially declared area is 40,683. Of those, 11,613 had FEMA Verified Losses (FVL). Data in Table 23 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

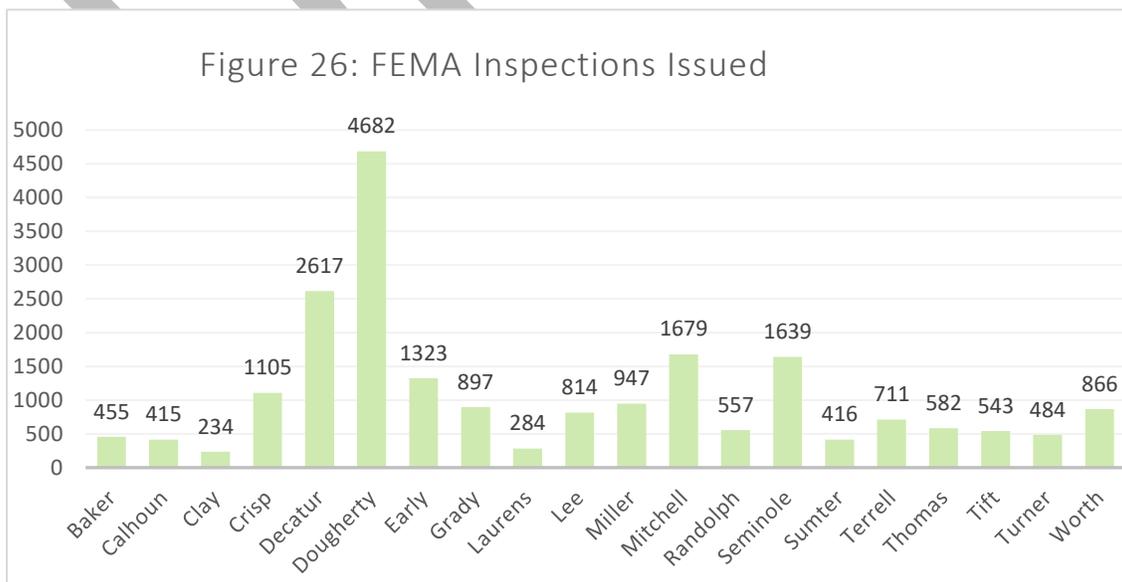
Randolph	858	393	\$ 478,639.01	\$ 1,217.91
Terrell	1,251	359	\$ 459,388.68	\$ 1,279.63
Laurens	478	191	\$ 409,177.68	\$ 2,142.29
Calhoun	766	345	\$ 376,511.55	\$ 1,091.34
Turner	742	352	\$ 311,332.71	\$ 884.47
Thomas	1,255	249	\$ 302,591.95	\$ 1,215.23
Tift	967	324	\$ 289,430.78	\$ 893.30
Sumter	748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

Figures 24 and 25 show the density of applicants with FEMA Verified Losses. Figure 24 illustrates the losses above \$0 and Figure 25 shows losses above \$2,500. In Figure 24, 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 24 and Figure 25 suggesting a large portion of applicants had fewer than \$2,500 in FVL.



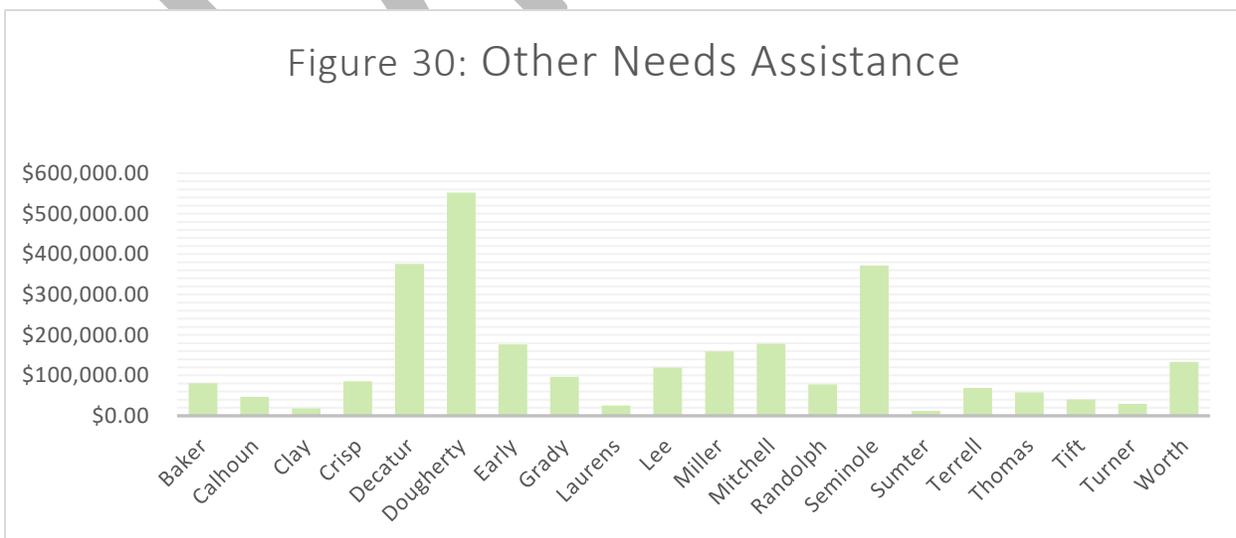
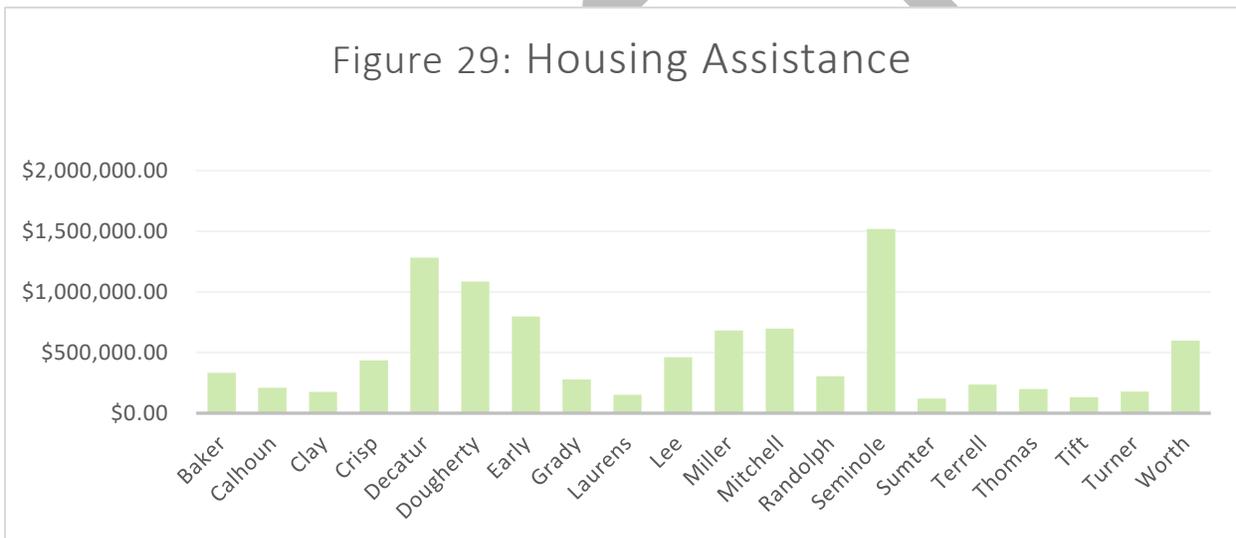
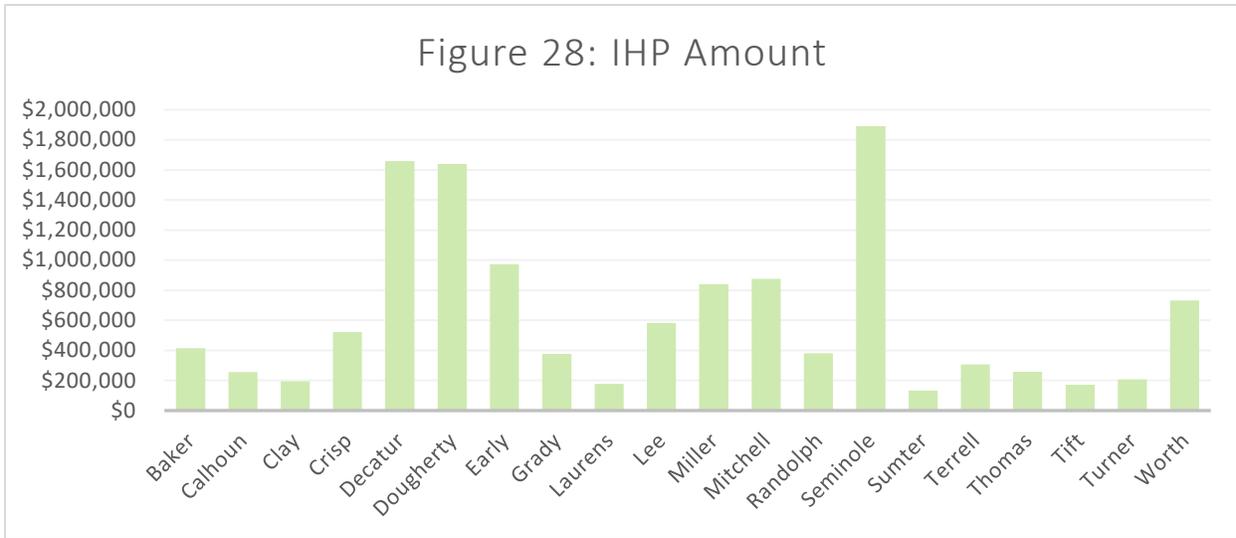


FEMA's standard loss verification method for initial eligibility determination is an onsite inspection by a FEMA inspector. These inspections are an essential part of the recovery process; the results from these inspections will determine eligibility and the amount of award for the FEMA applicant. In 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.

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

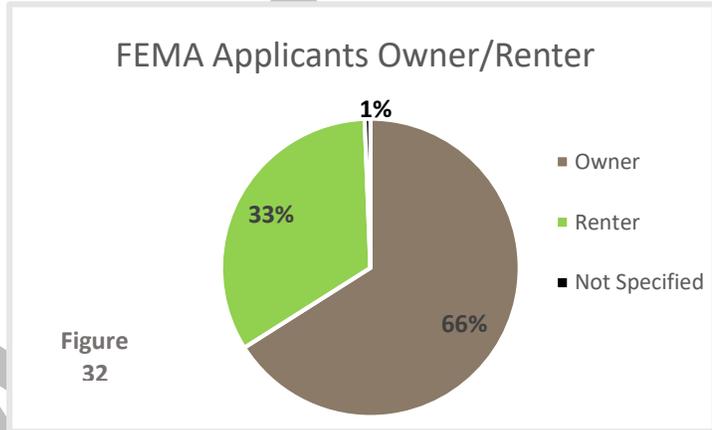


Impact by Housing Ownership Status

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 31**  
FEMA Applicants Owner and Renter

Owner	26,856
Renter	13,577
Not Specified	250



**Figure 33 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
<b>Total</b>	<b>82</b>

**Figure 34 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
<b>Total</b>	<b>39</b>

### 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.

<b>County</b>	<b>Applications Approved</b>	<b>Dollars Approved</b>	<b>AVG Loan Amount</b>
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 37 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 37: 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.

Figure 38: HUD Damage Calculators	
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 39). 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.

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 39.

### 1. FEMA Applicants Failed Income Test for SBA Loan

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

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

Total SBA Applications	4,416
SBA Applications Declined or Withdrawn	3,878
Unmet Need	\$93,638,188

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.

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.

Figure 43: FEMA Public Assistance Totals

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			<b>\$8,369,558.26</b>

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 43 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 43. 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 44 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 44 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.

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

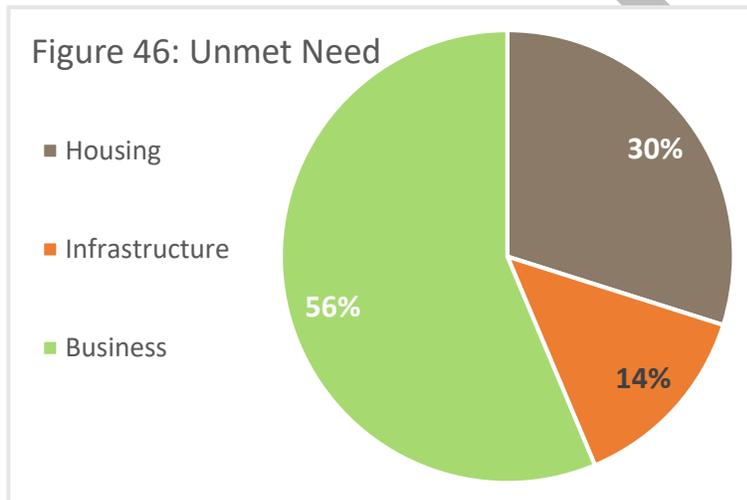
Using SBA business data to understand the financial impact to livelihoods provides a comprehensive understanding of impacts and unmet recovery needs for businesses across the state. The Small Business Administration makes low-cost disaster loans available to qualified businesses to repair or replace 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
<b>Total unmet business need</b>		<b>\$250,476,562</b>

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).



**Figure 47: Unmet Needs Summary**

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

## 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%), Small Business Economic Revitalization (20%), Workforce Development (20%), and Infrastructure (20%). In addition, the following activities will be undertaken, Planning (10%), and administration (5%).

#### Eligible Communities

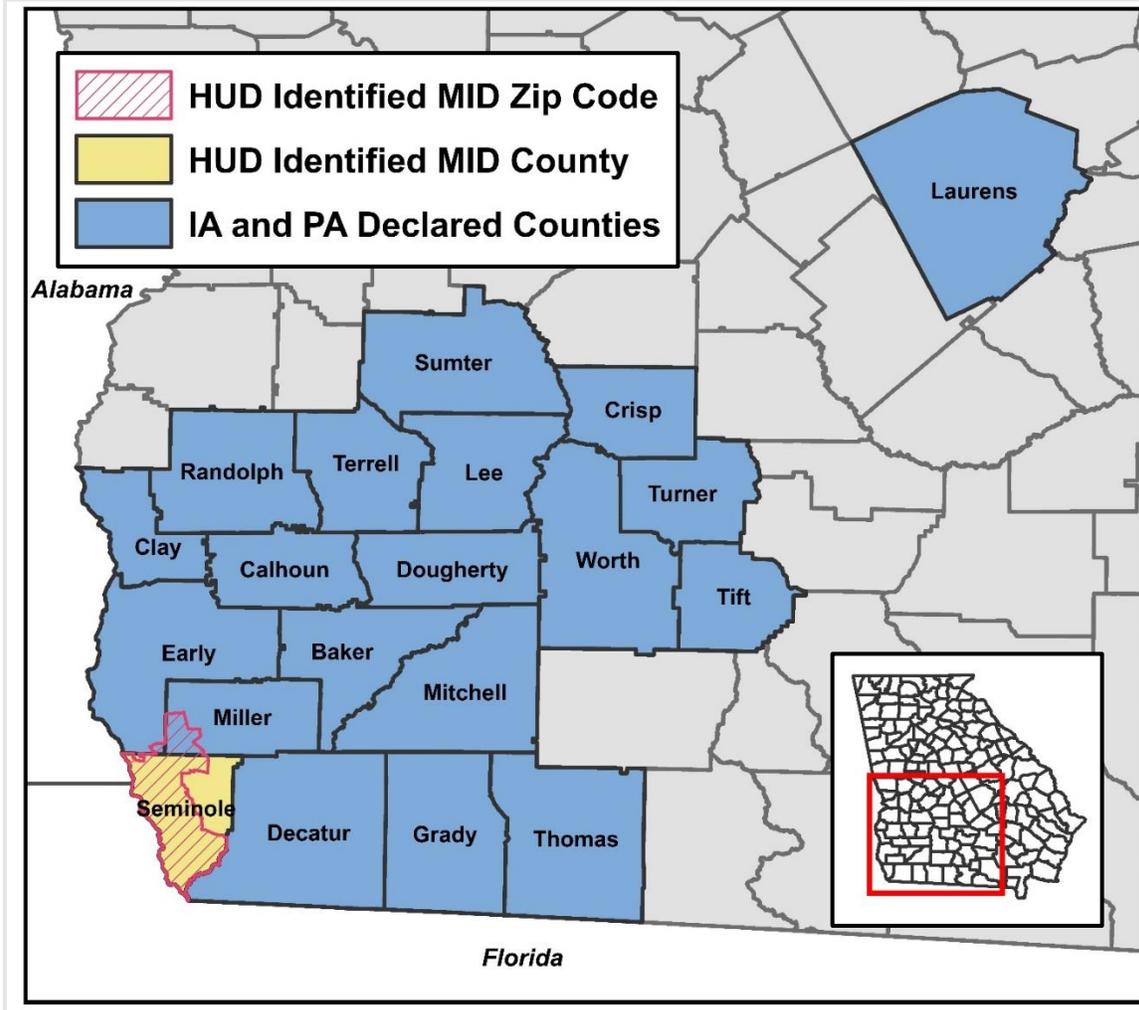
To prioritize limited funding in areas with the highest damage, HUD identified the zip code 39845 in Seminole County as Most Impacted and Distressed (MID) and required that a minimum of 80 percent of the allocation must address unmet needs within the county that contains the zip code. When the emergency 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 49. A map of the eligible areas is shown in Figure 50.

Figure 48: HUD-Identified MID Area	
Zip Code 39845   Seminole County	

Figure 49: Eligible Counties				
Baker	Dougherty	Miller	Terrell	= 20
Calhoun	Early	Mitchell	Thomas	
Clay	Grady	Randolph	Tift	
Crisp	Laurens	Seminole	Turner	
Decatur	Lee	Sumter	Worth	

## Hurricane Michael (DR-4400) Areas of Impact

Figure 50



### 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 E.

### 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. The budget for the CDBG-DR programs is shown in Figure 52.

Public Housing Authorities, Affordable Housing Needs, Homeless Needs

DCA will identify and address the rehabilitation, reconstruction and replacement of housing and shelters in the areas affected by the disaster. DCA sought input from Public Housing Authorities (PHA) located in the Most-Impacted and Distressed (MID) areas and agencies dedicated to serving vulnerable populations. If the need arises, CDBG-DR funds may be used for the rehabilitation, or new construction of HUD-assisted housing or affordable housing units once other funding streams are fully exhausted. Funds may also be used for homelessness prevention if the need arises.

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 51 provides the analysis of this requirement.

Area	Allocation	% of Allocation
Most Impacted and Distressed Zip Code: (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

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; Urgent Need
Business	Small Business Economic Revitalization Program	\$8,367,400	20%	\$4,183,700	50%	LMI; Urgent Need
	Workforce Development	\$8,367,400	20%	\$8,367,400	100%	LMI
Infrastructure	Competitive Infrastructure	\$8,367,400	20%	\$5,857,180	70%	LMI; Urgent Need
Total Program Budget		\$35,561,450		\$25,729,755		
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		

## Programs

### Homeowner Rehabilitation and Reconstruction Program

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

**CDBG-DR Allocation:** \$10,459,250

**Projected Accomplishments:** Estimated to serve 100 households

**Proposed Start Date:** January 2021\*

**Proposed End Date:** January 2024

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

**Administering Entity:** DCA will administer this program directly

*\*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.*

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, and households with children (under 18). 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.

## 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

**Projected Accomplishments:** Estimated to serve 600 individuals

**Proposed Start Date:** January 2021

**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

#### 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.

#### 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 encourage 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.

#### Affirmatively Furthering Fair Housing

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.

## 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. 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 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.

### 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. The Scoring Matrix will be posted on DCA's CDBG-DR website in advance of the release of program applications. The scoring matrix may include the following categories: demographic need, program feasibility, program impact, program strategy, and leverage of additional resources. 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.

### 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.

### Workforce Development Program

Residents within the 20 county area will submit applications for workforce development related services to the vendor contracted by DCA to assist in program implementation. DCA will develop Program Policies and Procedures that detail the application review process for the program.

## Expenditure Schedule

Unmet Needs Expenditure Schedule								
Quarter	Admin	Planning	Homeowner Rehab	Infrastructure	Small Business	Workforce Dev.	Total	100%
Q1	\$45,000	\$45,000	\$0	\$0	\$0	\$0	\$90,000	0.22%
Q2	\$105,000	\$45,000	\$0	\$0	\$0	\$0	\$150,000	0.36%
Q3	\$105,000	\$50,000	\$150,000	\$150,000	\$25,000	\$25,000	\$505,000	1.21%
Q4	\$105,000	\$50,000	\$150,000	\$350,000	\$25,000	\$25,000	\$705,000	1.69%
Q5	\$125,000	\$100,000	\$150,000	\$350,000	\$100,000	\$100,000	\$925,000	2.21%
Q6	\$125,000	\$150,000	\$150,000	\$1,000,000	\$150,000	\$150,000	1,725,000	4.12%
Q7	\$125,000	\$150,000	\$325,000	\$1,000,000	\$350,000	\$350,000	2,300,000	5.50%
Q8	\$125,000	\$150,000	\$325,000	\$1,000,000	\$350,000	\$350,000	2,300,000	5.50%
Q9	\$125,000	\$200,000	\$575,000	\$1,000,000	\$1,000,000	1,000,000	\$3,900,000	9.32%
Q10	\$125,000	\$250,000	\$575,000	\$717,400	\$1,000,000	\$1,000,000	\$3,667,400	8.77%
Q11	\$100,000	\$300,000	\$1,250,000	\$725,000	\$1,000,000	\$1,000,000	\$4,375,000	10.46%
Q12	\$100,000	\$350,000	\$1,250,000	\$725,000	\$1,000,000	\$1,000,000	\$4,425,000	10.58%
Q13	\$100,000	\$350,000	\$1,250,000	\$500,000	\$500,000	\$500,000	\$3,200,000	7.65%
Q14	\$80,000	\$350,000	\$1,250,000	\$500,000	\$725,000	\$725,000	\$3,630,000	8.68%
Q15	\$80,000	\$375,000	\$1,250,000	\$200,000	\$725,000	\$725,000	\$3,355,000	8.02%
Q16	\$80,000	\$275,000	\$1,200,000	\$150,000	\$717,400	\$717,400	\$3,139,800	7.50%
Q17	\$75,000	\$275,000	\$375,000	\$0	\$500,000	\$500,000	\$1,725,000	4.12%
Q18	\$65,000	\$175,000	\$200,000	\$0	\$200,000	\$200,000	\$840,000	2.01%
Q19	\$65,000	\$175,000	\$34,250	\$0	\$0	\$0	\$274,250	0.66%
Q20	\$65,000	\$150,000	\$0	\$0	\$0	\$0	\$215,000	0.51%
Q21	\$50,600	\$100,000	\$0	\$0	\$0	\$0	\$150,600	0.36%
Q22	\$45,000	\$75,000	\$0	\$0	\$0	\$0	\$120,000	0.29%
Q23	\$45,000	\$43,700	\$0	\$0	\$0	\$0	\$88,700	0.21%
Q24	\$31,250	\$0	\$0	\$0	\$0	\$0	\$31,250	0.07%
<b>Total</b>	<b>\$2,091,850</b>	<b>\$4,183,700</b>	<b>\$10,459,250</b>	<b>\$8,367,400</b>	<b>\$8,367,400</b>	<b>\$8,367,400</b>	<b>\$41,837,000</b>	<b>100%</b>

## 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 54 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.

Program Type	Program	Amount Serving LMI	LMI %	National Objective
Housing	Homeowner Rehabilitation and Reconstruction	\$7,321,475	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	70%	LMI; Urgent Need
<b>Total Program Budget</b>		<b>\$25,729,755</b>		

### 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.

No housing projects with eight or more units are proposed for these funds. If a need arises and CDBG-DR funds are used on units with eight or more units, DCA will develop controls to ensure costs are reasonable and necessary.

#### ***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](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.

#### 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.

#### 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 providing all citizens with equal access to information about the recovery program, including persons with disabilities and limited English proficiency. DCA follows HUD’s regulation, 24 CFR Part 1, “Nondiscrimination 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 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.

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## Appendix A: Citizen Participation Plan

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## **Citizen Participation Plan**

### **2018 CDBG-DR Allocation: Public Law 115-254**

This document was prepared by the Georgia Department of Community Affairs (DCA) to meet the citizen participation requirements for the 2018 CDBG-DR allocation following Hurricane Michael (DR-4400) in October 2018. The plan reflects the alternative requirements as specified by the U.S. Department of Housing and Urban Development (HUD) in Federal Register Notice 85 FR 4681 and any amendments, as applicable. DCA ensures the Citizen Participation Plan meets CDBG-DR regulations and takes into consideration any waivers and alternatives made available by HUD.

The Citizen Participation Plan is developed 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 are encouraged to participate in the planning and implementation of the 2018 CDBG-DR activities.

#### **Outreach Summary**

In anticipation of receiving federal funds, DCA is required to incorporate specific citizen participation requirements into its Action Plan. This plan outlines how DCA intends to meet or has already met these requirements.

During the development of the Action Plan, DCA will conduct outreach efforts to impacted stakeholders. DCA will consult with elected officials from all FEMA Individual Assistance (IA) and Public Assistance (PA) declared counties from the 2018 Hurricane Michael Disaster. DCA will initiate outreach through one of the following mechanisms: conference calls, emails, or in-person meetings. DCA will also host phone calls and communicate through email with local elected officials to ensure feedback is consistent and continual, distribute periodic CDBG-DR status updates produced by the State's CDBG-DR Director, Project Manager, or Field Coordinator and facilitate community meetings with local officials and staff to discuss program guidelines, planning and to receive feedback from local jurisdictions.

DCA will consult with all disaster impacted local governments, public housing authorities and Indian tribes on the Action Plan. To ensure consistency with regional development plans, DCA will consult with the Regional Planning Commissions within the affected area.

The objectives of DCA's outreach activities are to ensure that all citizens are aware of the 2018 CDBG-DR funding and planning process, have an opportunity to comment on or suggest proposed uses for the funds, and to maximize public awareness and access to 2018 CDBG-DR program funds when available.

## 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.

## Development of Disaster Recovery Action Plan

The State is developing the 2018 CDBG-DR 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.

## Action Plan Public Notice and Comment Period

Prior to finalizing the Action Plan, DCA will make available to stakeholders, citizens, public agencies and other interested parties. DCA will provide public notice and seek feedback for the development of the Disaster Recovery Action Plan through emails, website postings, and public meetings.

DCA will publish the draft 2018 CDBG-DR Action Plan for 30 days 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-6>

For those who are unable to obtain a copy of the draft Action Plan online, a copy will be made available at the DCA Headquarters. Citizens who wish to participate in the planning process are encouraged to contact their local government or reach out to DCA using the following contact information:

Via Email: [CDBG-DR@dca.ga.gov](mailto:CDBG-DR@dca.ga.gov)

Via Mail: Georgia Department of Community Affairs  
Community Finance Division CDBG-DR  
60 Executive Park South, NE  
Atlanta, Georgia 30329

DCA will make every attempt to hold 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 one (1) week before it is held.

## Amendments to Action Plan

When DCA desires to amend its Action Plan, it will be done in accordance with the Federal Register Notice 83 FR 40316. The Action Plan is a living document that may be subject to amendments in response to new information and data that is realized during the life of the project. Updates to the plan may be substantial or non-substantial.

### 1. Substantial Amendments

Defined as an amendment that involves one of following:

- A change in program benefit, beneficiary, or eligibility criteria
- The allocation or re-allocation of more than \$1 million
- The addition or deletion of an allowable activity

After the draft of the substantial amendment is complete, DCA will elicit comments from the public. DCA will post the amended plan and a list of all changes to the DCA website. The amendment will be prominently displayed on the website for 30 calendar days.

Written comments on amendments to the Action Plan may be submitted to DCA via email at [CDBG-DR@dca.ga.gov](mailto:CDBG-DR@dca.ga.gov) or mailed to the following address:

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

All comments will be included as an attachment to the final Substantial Amendment. Final Substantial Amendments, approved by HUD, will be posted to DCA's Disaster Recovery website.

### 2. Non-Substantial Amendments

For non-substantial amendments, DCA shall notify HUD, but public comment is not required.

Every amendment, substantial or not, shall be numbered sequentially and posted on the DCA CDBG-DR website. The Action Plan and all amendments shall be made available in English and Spanish.

## Action Plan Complaint Process and Procedures

Persons wishing to object to the activities undertaken may make such objection known in writing to DCA. DCA will consider objections made only on the following grounds:

- The applicant describes needs and objectives plainly inconsistent with available facts and data;
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; and the program does not comply with the requirements set forth in the Disaster Recovery Action Plan or other applicable laws.

- Such objections should include identification of the requirements not met and supporting data.

DCA will respond to comments, complaints and grievances in a timely manner. Responses will be made in writing and may be responded to via email, if applicable. When practicable, such responses shall be made within fifteen (15) working days and be included in the final Disaster Recovery Action Plan.

Please address your comments, complaints, or grievances to:

Via Email: [CDBG-DR@dca.ga.gov](mailto:CDBG-DR@dca.ga.gov)

Via Mail: Georgia Department of Community Affairs  
Community Finance Division CDBG-DR  
60 Executive Park South, NE  
Atlanta, Georgia 30329

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).

#### Quarterly Performance Reporting

The State must submit a Quarterly Performance Report (QPR) through HUD's Disaster Recovery Grant Reporting (DRGR) system no later than thirty (30) days following the end of each calendar quarter. Within three (3) days of submission to HUD, each QPR must be posted on the DCA website for public review and comment. The website is listed below:

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

The State's first QPR is due after the first full calendar quarter after the grant award. QPRs will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

Following completion of all the aforementioned activities, DCA will confer with HUD, as required, to determine the CDBG-DR grant is ready to be closed out, and with HUD's agreement, will submit and make publicly available its final QPR.

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 complete or number of low and moderate income persons benefiting; and the race and ethnicity of persons assisted under direct-benefit activities. The State must also record the amount of funding expended for each contractor identified in the Action Plan. Efforts made by the State to affirmatively further fair housing will also be included in the QPR.

During the term of the grant, the State will provide citizens, affected local governments, and other interested parties with reasonable and timely access to information and records relating to the approved program and to the grantee's use of grant funds as well as contracts procured

with CDBG-DR funding. This information shall be posted on the DCA website, <https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>, and provided on request.

#### Close Out Process

DCA will make all performance reports available to the public on the CDBG-DR website throughout the grant period.

Prior to close-out of the CDBG-DR program, the final QPR will be made available on the DCA website for public review and comment prior to final submission to HUD.

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Appendix B: Program Implementation Plan

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## 2018 CDBG-DR Implementation Plan

The Georgia Department of Community Affairs (DCA) is the administrator and fiscal agent responsible for implementing the 2018 CDBG-DR grant pursuant to 85 FR 4681. DCA's Commissioner, Christopher Nunn, reports directly to the Governor of the State of Georgia. DCA has prior experience in managing HUD funds through a variety of programs, including the 2017 CDBG-DR Unmet Needs Allocation (83 FR 40314), 2017 CDBG-MIT Allocation (84 FR 45838) and Annual State CDBG Funding.

DCA has existing systems and procedures, as well as formally established monitoring strategies that meet or exceed the regulatory requirements including those related to HUD program rules and regulations, civil rights, environmental, labor standards, fair housing, citizen participation and record-keeping. DCA has financial management systems, policies, procedures, and practices in place necessary to uphold the fiscal responsibility, as detailed in this plan. DCA will manage the 2018 CDBG-DR funds responsibly, efficiently, and transparently.

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### 1. Financial Controls

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The Georgia Department of Community Affairs certifies its proficiency in financial management using established financial systems and controls. The sections below provide further description of existing risk management measures.

#### HUD Financial Management Guide

DCA is requesting HUD rely on the financial certifications approved by HUD for the 2017 CDBG-DR allocation. According to 85 FR 4681, "A grantee that received a certification of its financial controls and procurement processes pursuant to a 2016 or 2017 disaster may request that HUD rely on that certification for purposes of this allocation, provided, however, that grantees shall be required to provide updates to reflect any material changes in the submission." The information contained within this Implementation Plan matches the 2017 disaster financial controls and procurement processes set forth by DCA. Any material changes are included in this document or the Standard Operating Procedures (SOPs).

#### Single Audit

As a recipient of federal funds, DCA is subject to the Single Audit Act of 1984, as amended in 1996. The Single Audit Act standardizes requirements for auditing federal programs and requires review of all federal

programs by an independent Certified Public Accountant (CPA) for compliance with program requirements and proper expenditure of funds.

DCA is included in the State's fund level and entity wide financial statements as part of the Comprehensive Annual Financial Report (CAFR) of Georgia. Additionally, DCA is also included in the Single Audit Report issued by the Department of Audits. The Single Audit indicates that DCA has no findings, material weaknesses, significant deficiencies, or questioned costs. The audit can be viewed at the following link: [https://www.audits.ga.gov/SGD/single\\_audit.html](https://www.audits.ga.gov/SGD/single_audit.html)

DCA will monitor Subrecipients for compliance with financial administration requirements in accordance with Single Audit requirements now codified in 2 CFR 200, Subpart F. DCA requires all Subrecipients who expend \$750,000 or more in federal funds during the fiscal year to submit their Single Audit for review through the Georgia Department of Audits and Accounts, Nonprofit and Local Government Audits Division, as part of their annual requirement in OCGA 36-81-7.

#### Financial Management Systems

DCA maintains accounting and grants management systems to support a multi-functional grants management program. DCA has the requisite financial controls in place to account for and properly manage the 2018 CDBG-DR funds. These systems provide accurate, current, and complete disclosure of the financial status of the 2018 CDBG-DR supported activity. The systems meet all Federal and State requirements.

Subrecipient accounting records are supported by source documentation that is stored in compliance with record-keeping requirements. DCA has record-keeping procedures to retain source documentation for records applied to the 2018 CDBG-DR program to ensure records adequately identify the source and application of 2018 CDBG-DR funds provided and to maintain source documentation evidence to confirm the costs incurred and the date of expenditure.

#### Internal Controls

DCA has existing policies and procedures to meet financial management requirements including, but not limited to, applicable regulations and requirements, financial accountability and records, authorized signatures for payments, requests for payment, bank accounts, escrow accounts, administrative costs, and audit requirements.

DCA's organizational structure includes risk management measures that establish clear lines of authority and approval, segregation of duties, and secure access to financial resources. The Chief Financial Officer oversees DCA's financial division.

DCA has sufficient internal controls in place to account for and properly manage the 2018 CDBG-DR funding in a manner that is consistent with all federal accounting requirements. These internal controls will support the prevention of fraud, waste, and abuse to ensure:

- No person involved in the program decision-making process obtains a financial benefit;
- No single point of sign off for financial transactions;
- Separate record-keeping for 2018 CDBG-DR funds versus general accounting operations;
- Reconciliation of accounts handled by employees who are not responsible for payroll preparation and/or paycheck issuance;
- Policies and procedures in place to maintain effective control and accountability for all cash, real and personal property, and other assets;
- Policies and procedures in place to control access to assets and documents; and
- Policies and procedures in place to control access to Personally Identifiable Information (PII).

### Timely Expenditure of Funds

Per Federal Register Notice 85 FR 4681, CDBG-DR funds must be expended within a six (6) year period beginning on the date HUD signs the grant agreement. DCA understands that HUD will periodically review expenditures as progress towards meeting the deadline. DCA will review in-house expenditures and Subrecipient's expenditures to ensure that funds are spent on eligible costs and in a timely manner. DCA's Community Finance Division, CDBG-DR Field Representatives and DCA's State CDBG Compliance Team will monitor project funds and schedules.

DCA administers Georgia's State CDBG program, therefore staff members have experience with monitoring the expenditure rate of the State CDBG program. With DCA's State CDBG Program, DCA's Community Finance Division maintains detailed reports monitoring the expenditure of funds and project schedules. All data for the 2018 CDBG-DR Program will be tracked through Filemaker Pro. Monthly and annual expenditures can be found in this system. Considering that the amount of the CDBG-DR grant is larger than the usual State CDBG allocation, DCA will adapt and enhance its current processes by establishing standard tracking mechanisms, processes and templates to ensure consistency and continuity among program activities. DCA will also maximize its use of technology to support and augment any standard processes instituted to ensure timely expenditure of funds.

DCA will hold all Subrecipients and/or contractors accountable through the establishment of benchmarks and other critical milestones. Subrecipients and/or contractors will be required to provide detailed reports concerning expenditure of funds and project progress to DCA upon its request. At a minimum, DCA requires each subrecipient complete a quarterly report detailing project progress, documenting contracts, and financial reporting.

DCA will develop policies and procedures that ensure timely payment and expenditure of funds for contracts and bills. The policies and procedures will also ensure the actual and projected expenditure of funds is accurately reported in the DRGR Quarterly Reporting System (QPR).

DCA will submit a projection of expenditures and an Outcomes Plan to HUD with the initial Action Plan, in compliance with Federal Register Notice 85 FR 4681. Revised projections will be sent to HUD when

program changes impact projected outcomes, funding levels, and recovery timelines. DCA understands HUD will use this information to track proposed versus actual performance. DCA will aggressively monitor Subrecipients and/or contractors, using benchmarks, milestones and projections as a means to minimize delays in expending funds for eligible project activities.

#### Reprogramming Funds in a timely manner for activities that have stalled

DCA reserves the right to cancel a Subrecipient Grant Award if sufficient progress is not being made toward completion of the project. CDBG-DR staff will conduct an on-site monitoring visit at least once a quarter with each Subrecipient. DCA will also monitor the financial progress as the draw requests are sent to DCA. If sufficient progress is not being made, CDBG-DR program staff will notify the Subrecipient in writing detailing the lack of progress, possible corrective actions, possible conditions (if necessary), and the date which DCA will re-evaluate the progress. DCA will reprogram funds if the Subrecipient is unable to get back on track. Actions will be consistent with 2 CFR 200.338 and 2 CFR 200.207.

#### 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). 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 transferred to DCA's State CDBG award.

#### Procurement

In accordance with 24 CFR 570.489 (g), DCA has chosen to follow its own procurement policies and procedures for procurement of goods and services procured directly by DCA that is paid for in whole or in part with 2018 CDBG-DR funds. The DCA Finance Division is responsible for 2018 CDBG-DR procurement. Demetria Jones, Purchasing Card Administrator, is the point of contact for all procurement inquiries.

For Subrecipients, the following policies and procedures seek to ensure full and open competition in the procurement of goods and services when 2018 CDBG-DR funds are used, in whole or in part, for the implementation of 2018 CDBG-DR projects at the local level. Note, DCA's procurement policies and procedures implement the requirements of 24 CFR 570.489 (g) for its Subrecipients. These include:

- Full and open competition;
- Identification of Methods of Procurement and their applicability;
- Prohibition of cost plus a percentage of cost and percentage of construction costs methods;
- Assurance that all purchase orders and contracts include any clauses required by Federal statutes, Executive orders, and implementing regulations; and
- Subrecipient and contractor determinations shall be made in accordance with the standards in 2 CFR 200.330.

The State Purchasing Act (O.C.G.A. Section 50-5-50 et seq.) governs the purchasing activities of all Georgia state government entities. The Georgia Department of Administrative Services State Purchasing Division publishes the Georgia Procurement Manual that governs all solicitations made by state government entities.

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## 2. Detection of Fraud, Waste, and Abuse

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DCA is committed to the prevention of fraud, waste, and abuse. All suspected cases of fraud will be taken seriously and reported to the Georgia Office of the Inspector General for further investigation. DCA staff and Subrecipient staff will attend fraud related training provided by HUD OIG (as available) to assist in the proper management of 2018 CDBG-DR funds.

DCA has a monitoring process which includes several layers of approval before funds are expended, allowing us to monitor the use of funds on an individual basis. This process includes a multi-level review of the use of funds. These reviews occur throughout the process, beginning with the front-line contractor, through the subrecipient process, and finally ending with the Community Finance Division at DCA. There is an evaluation to determine the use of funds is legitimate and keeping with the requirements of the governing policies, procedures, rules, regulations, ordinances, and laws. If any other determination is reached, the use of funds will be delayed as additional information is requested. If the additional information does not result in a change in determination, the use of funds for that purpose will be denied.

DCA's monitoring process includes on-site and desk monitoring. The priority and frequency of these monitoring activities is determined using a risk assessment. The completed risk assessment provides the basis for determining an individual Subrecipient's monitoring schedule. This individualized schedule will allow DCA to apply staff and travel resources for monitoring, training, and technical assistance. DCA will utilize existing processes for the State's CDBG program for conducting on-site reviews that include written monitoring and technical assistance guidelines, as well as checklists, policies and procedures. Field staff will monitor individual project files for compliance with HUD requirements.

### Procedures to Prevent Duplication of Benefits

Federal law prohibits any person, business concern, or other entity from receiving Federal financial assistance for any part of a loss to which he or she has already received financial assistance through any other program, insurance, or funding source. DCA has policies and procedures in place to confirm that recipients of funds under its 2018 CDBG-DR award do not receive a duplicate benefit. In accordance with the Robert T. Stafford Act, as amended, DCA will take the actions necessary to conduct comprehensive analyses of assistance provided to Subrecipients in order to prevent Duplication of Benefits (DOB) from occurring.

DCA's 2018 CDBG-DR program will require a DOB analysis for each applicant to consider other disaster mitigation funding sources when processing applications. Common assistance funding sources include:

- Federal Emergency Management Agency (FEMA);

- Small Business Administration (SBA);
- National Flood Insurance Program (NFIP);
- Private Insurance; and
- Private and nonprofit disaster assistance.

DCA will consider assistance amounts received/approved from alternate sources such as FEMA, insurance coverage, SBA and/or philanthropic organizations. DCA has data sharing agreements with FEMA and SBA to ensure the most recent assistance is used in DOB/VOB analyses.

The DCA duplication of benefits review process currently includes forms that each subrecipient will complete for all proposed 2018 CDBG-DR activities, prior to approval:

- Georgia Eligibility Release Form;
- Georgia Duplication of Benefits Calculation Form; and
- Georgia Insurance Affidavit.

Additionally, DCA will have a subrogation clause in each subrecipient agreement. These agreements will be signed at the time of application, prior to receiving assistance. Per the subrogation clause, any funds found to be a Duplication of Benefits must be returned to DCA. Under this clause, should a subrecipient receive CDBG-DR funding to support an activity and subsequently receive outside funding that would represent a Duplication of Benefits, the duplicative 2018 CDBG-DR funds must be returned to the Community Finance Division of DCA. DCA may withhold payment on any project or outright suspend activities, if a duplication of benefits issue is not resolved in a timely manner. Furthermore, DCA will not initiate or complete contract close-out processing until any identified duplication of benefit issues are resolved to DCA's satisfaction.

#### Technical Assistance

CDBG-DR staff will provide technical assistance to Subrecipients from application stage through the completion of projects to ensure that funds are used for eligible 2018 CDBG-DR activities and appropriate National Objectives are met. Technical Assistance will also be offered to Subrecipients to ensure all knowledge gaps are filled and technical expertise is provided to ensure timely recovery throughout the life of the program.

CDBG-DR staff have some technical assistance capacity through implementation of the 2017 Unmet Needs and CDBG-MIT grants, however, DCA may contract with a technical assistance provider should the needs of Subrecipients be greater than the capacity of existing CDBG-DR staff. Technical assistance may be procured for any personnel that are not employed by DCA upon submission of this Action Plan.

DCA is currently meeting with the Georgia Historic Preservation Division (HPD), the State Historic Preservation Office (SHPO), to revise a Programmatic Agreement for the CDBG-DR programs, including

2018 CDBG-DR programs. This agreement will address processes that will be used to ensure review and compliance with Section 106 of the NHPA, where required.

DCA will also consult with the Georgia Field Office of the U.S. Fish and Wildlife Service and the Southeast Regional Office of the NOAA Fisheries concerning Section 7 of the Endangered Species Act prior to program implementation.

CDBG-DR staff will consult with the Indian if 2018 CDBG-DR activities are provided in tribal areas.

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### 3. Internal Auditing

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DCA has an internal auditor on staff reporting directly to the Agency's Chief Operating Officer. The internal auditor will review files and test for compliance with financial standards and procedures, including procurement practices and cost reasonableness for all grant-funded activities. The internal auditor will review programmatic manuals, documents, etc. to ensure compliance with all rules and regulations. All reviews will be completed on an ongoing basis through the life of the 2018 CDBG-DR grant.

#### Internal Audit Function

DCA covers the costs associated with internal audit functions with state bond allocation dollars. The Internal Auditor will perform a full program compliance, systems and financial audit review. The auditor will review files and test for compliance with financial standards and procedures including procurement practices and adherence to cost reasonableness for all operating costs and grant-funded activities.

All program expenditures will be evaluated to ensure they are:

- Necessary and reasonable;
- Allocable according to the CDBG-DR or MIT grant agreement(s);
- Authorized or not prohibited under State/local laws and regulations;
- Conform to limitations or exclusions (laws, terms, conditions of award, etc.);
- Consistent with policies, regulations and procedures;
- Adequately documented; and
- Treated consistently (with non-CDBG costs)

#### Enhancing the internal audit function

In an effort to increase internal audit capacity, DCA's Internal Auditor is collaborating with other Disaster Recovery Internal Auditors. Through this collaboration, the Internal Auditors share best practices in development of policies and procedures.

#### Independence and Objectivity

The Internal Audit (IA) function shall perform its activities in accordance with the principles of the Institute of Internal Auditors' (IIA's) Code of Ethics: Integrity, Objectivity, Confidentiality, and Competency. The IA

function shall conduct work in an unbiased manner, consider relevant circumstances, respect the value and ownership of information, and apply and seek knowledge and skills needed to perform services.

The IA function will conduct services independently by reporting to executive management. The IA function will consider independence and objectivity when undertaking and executing projects. When there are internal and external threats to objectivity or independence, they will be considered and documented when considering the ability to conduct work. Consulting engagements will be considered during this process. The IA function may not objectively conduct work for areas over which they made management decisions in the prior year. The IA function will document the consideration of organizational and individual independence in fact and in appearance and any impairments for each assurance engagement on a signed Statement of Independence.

#### Audit Schedule

The IA function shall conduct an entity-wide risk assessment on an annual basis. This risk assessment shall consider risk and control concerns of management and stakeholders as well as inherent risk. The IA function will propose an audit plan to the Executive Audit Committee for approval. The audit plan will address why specific processes or programs were identified as well as preliminary objectives. This will help ensure the IA function adds value to the organization and contributes to improvement of organizational risk management.

#### Engagement Planning

Upon approval of the audit plan, the IA function will initiate engagement planning for each activity. The IA function will send an engagement letter to appropriate management to schedule an entrance conference at the outset of projects. The purpose of the entrance conference will be to inform planning efforts by determining applicable criteria, systems, records, personnel, property, and reports from other assurance providers. Engagement planning will include identification of the audited entity's objectives, criteria, process and fraud risks, and relevant controls.

#### Engagement Execution

The factors identified during planning will help to establish and document the project objectives, scope, budget, schedule, and necessary resources. Sources of information will be documented in audit project work papers. This documentation may include whether information is sufficient, reliable, relevant, and useful. The project plan may be adjusted throughout the project if a need arises.

The IA function will use the International Standards for the Professional Practice of Internal Auditing (The Standards) as issued by the Institute of Internal Auditors (IIA) as guidance when planning and performing work. The Chief Operating Officer (COO) and Executive Audit Committee will provide oversight of the audit activity and planning efforts. Changes to audit plans may be adjusted as projects progress based on organizational needs. Opportunities for consulting efforts may also be considered while executing engagements.

### Internal Audit Reporting

The IA function will periodically meet with management of audited activities to communicate project progress. Prior to drafting a final report, the IA function will meet with relevant management to discuss the engagement's objectives, scope, and results to obtain feedback or clarification of outstanding issues.

The IA function will share the written report with management for review and response, if applicable. Audit reports will be distributed to relevant management, the COO, and the Executive Audit Committee. If engagement results are released to parties external to the organization, distribution and limits of use shall be discussed with senior management and legal counsel as appropriate. Communications will be accurate, objective, clear, concise, constructive, complete, and timely. If a communication contains an error or omission, the IA function will communicate corrected information with the parties who receive the initial communication.

The Standards will be used to guide engagement activities, but communications will not cite compliance or nonconformance with the Standards.

### Monitoring Progress

The IA function will establish a process to follow-up on engagement results communicated to management. If management has accepted a level of risk the IA function believes to be unacceptable, the Director of IA will discuss the matter with the COO and/or the Executive Audit Committee.

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## 4. Application Status Procedures

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Application status methods vary by activity type, such as, housing, infrastructure, economic development. At this time, DCA has not determined which programs best satisfy the unmet needs of the communities. The procedures for application status will be developed and included in The State of Georgia's 2018 CDBG-DR Action Plan. DCA will address the following topics related to application status in the Action Plan:

- How DCA will inform applicants of their status in the recovery application process;
- The method for communicating the status of applications;
- Procedures to ensure the accessibility and privacy of individual applicant information; and
- CDBG-DR Personnel that are responsible for each task

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## 5. Procedures to Maintain a Comprehensive Website

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DCA has a public website providing access to information and programs administered by the State. In accordance with HUD requirements, the CDBG-DR page is accessible directly from the main landing page of the main website ([www.dca.ga.gov](http://www.dca.ga.gov)) and separate pages can be accessed for CDBG-DR Unmet Needs, CDBG-MIT, and 2018 CDBG-DR grant information. See the images provided on the following pages.

DCA maintains compliance with ADA requirements for website accessibility and readability. DCA supports accommodations for citizens with limited English proficiency. DCA will provide documents on the website in languages other than English based upon the need of the non-English speaking communities.

DCA's Marketing/Communications department maintains control of the DCA public website and is involved in publishing all website content. Content for the site will consist of information from all aspects of the program and will be drafted by CDBG-DR team members. The website will be updated in a timely manner to reflect the most up-to-date information about the use of all 2018 CDBG-DR funds, as well as any changes to policies and procedures. All content will be draft reviewed in cooperation with the Marketing/Communications department prior to final posting. The following information will be posted on the public website (*not an exhaustive list*):

- Announcement of public hearings;
- Action Plan;
  - Initial Action Plan will be posted for no less than 30 days, prior to submission to HUD, to solicit public comment; and
  - Final HUD-Approved Action Plan
- DRGR Action Plan will be posted upon approval from HUD;
- Substantial Amendments to Action Plan;
  - Substantial Amendments will be posted for no less than 30 days, prior to submission to HUD, to solicit public comment; and
  - Final HUD-Approved Substantial Amendments;
- Non-Substantial Amendments to Action Plan will be permanently posted;
- Quarterly Performance Reports (QPRs) will be posted within 3 days of submission to HUD; and
  - Rejected QPRs will be re-published to the website within 3 days of submission of the revised version to HUD.
- The Citizen Participation Plan;
- Program announcements;
- Executed contracts.

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**Georgia Department of Community Affairs Website (Main Landing Page)**

[www.dca.ga.gov](http://www.dca.ga.gov)



**CDBG-DR Program Page (Central Landing Page Information)**

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

**LOCAL GOVERNMENT ASSISTANCE**

Research & surveys, planning, maps, volunteerism, building codes

**COMMUNITY & ECONOMIC DEVELOPMENT**

Financial assistance opportunities for communities

**SAFE & AFFORDABLE HOUSING**

Helping communities meet housing needs and connecting people with housing assistance

Community & Economic Development > Funding Programs > Community Development Block Grant Disaster Recovery Program (CDBG-DR)

## Community Development Block Grant Disaster Recovery Program (CDBG-DR)

Basic Info
Resources
Related Information

During 2017, severe weather events caused extensive damage in many parts of our state, resulting in three Presidential declarations of a major disaster -- two due to Southwest Georgia tornadoes and one in the wake of Hurricane Irma. Earlier this year, the federal government awarded Georgia \$64,904,000 in disaster recovery assistance to address "unmet needs" and "mitigation" in the areas damaged by one of these major disasters. The funding has been made available through the Department of Housing and Urban Development's (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) program, which focuses on covering "...necessary expenses for activities...related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas...".

This funding is now available to assist communities, some of which were completely devastated and remain uninhabitable a year after the fact. Counties that received public and individual assistance are eligible to receive these funds.

Funds will be prioritized for use in the most impacted and distressed areas, to facilitate long-term recovery through the restoration of infrastructure and housing, mitigation to protect from predictable future damage, and economic revitalization. DCA is actively working with HUD on program details, and will be coordinating directly with local governments in eligible disaster areas.

*Eligible counties: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, Worth*



**CONTACT**  
[CDBG-DR@dca.ga.gov](mailto:CDBG-DR@dca.ga.gov)

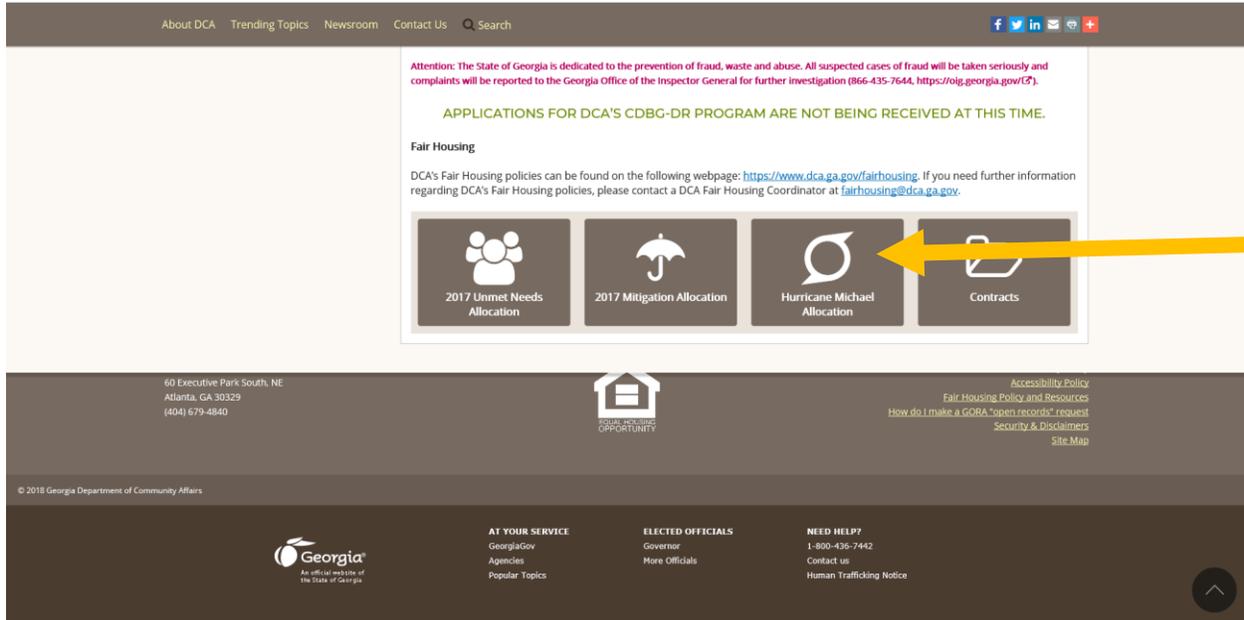
**Sign up for CDBG-DR updates!**

Get news from CDBG-DR in your inbox.

\* Email

**CDBG-DR Program Page (Central Landing Page Links)**

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



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## 6. Internal and Interagency Coordination

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As seen in the organizational chart on Page 15, all facets of the Department of Community Affairs' staffing ultimately report to DCA's Commissioner. The CDBG-DR team reports to the Deputy Commissioner and the Finance Division reports to the Chief Financial Officer. The Chief Financial Officer and the Deputy Commissioner communicate on a daily basis. All parties understand the importance of the other branches of the team and realize effective communication is vital for the success of the program. On any given day, members of the CDBG-DR team, the Director of Legal Services, the GIS team, the Internal Auditor and the Finance Division may work together to share information, create maps, or make decisions about policies.

For the 2017 Unmet Needs Allocation, communication between DCA and the Subrecipients occurs on a regular basis. DCA will continue to implement this practice with Subrecipients of the 2018 CDBG-DR program.

DCA believes it is vital to work with local and regional planning efforts as the programs are created and projects are submitted through the 2018 CDBG-DR program. The CDBG-DR Office Director and team have visited multiple communities affected by Hurricane Michael to share information about unmet needs. Communication will continue over the life of the program. During the application stage, DCA will require the communities to ensure proposed activities align with their long-term goals. Decisions for funding will be made based on information provided directly from local communities or Regional Commissions to ensure consistency throughout the programs.

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## 7. Staffing

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### Hurricane Michael Staffing Capacity Assessment

DCA has existing CDBG-DR staff, but will maximize the use of the resources available and bring on additional staff, as needed, to the extent funds are available. As DCA developed the staffing model, the agency considered all options and determined the most reasonable staffing model in relation to program activities. DCA will use existing policies and procedures established for the State CDBG program, CDBG-MIT, and/or 2017 CDBG-DR Unmet Needs programs when staffing and implementing the 2018 CDBG-DR Programs.

DCA's staffing model will be flexible to accommodate the needs associated with program activities. As the programs get underway, DCA will make the appropriate adjustments to accommodate the workload. The CDBG-DR Office Director and the CDBG-DR Project Manager will meet no less than quarterly as well as each time a new program begins (including but not limited to housing, economic development, and infrastructure programs) to assess the staffing capacity and work to fill any gaps that are identified. DCA will conduct, at a minimum, a monthly call with each of the Subrecipients to ensure their staffing capacity is being met. The organizational chart in this section gives a visual of the various functions associated with the program activities. Job descriptions are included following the organizational chart.

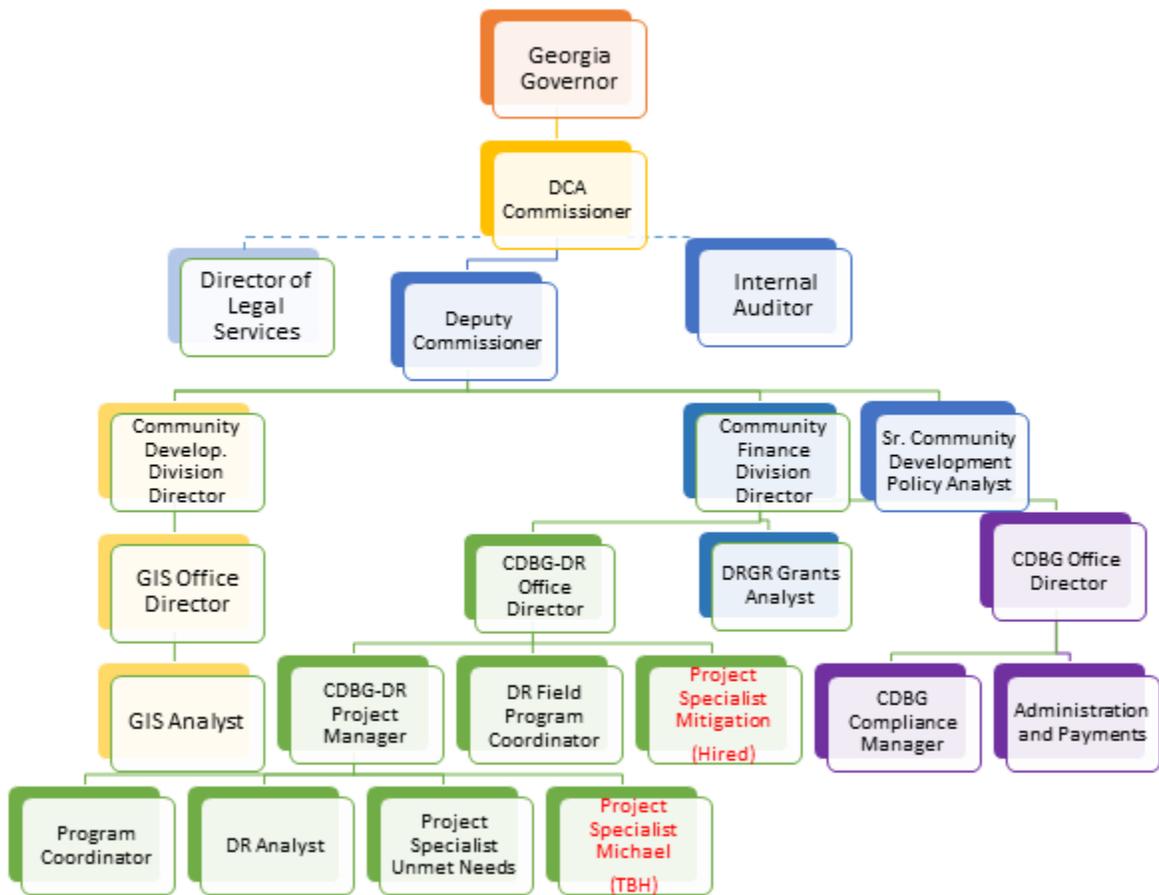
Key staff members have prior experience with the HUD funded State CDBG program and prior DR allocations. These programs include housing, economic revitalization and infrastructure activities. The programs offered with the 2018 CDBG-DR allocation will be similar to those offered in the CDBG-DR Unmet Needs, CDBG-MIT, and State CDBG Programs.

Because DCA is utilizing a Subrecipient model, staffing for Case managers will be the responsibility of the Subrecipients. DCA and the Subrecipients will follow Section 3 hiring processes and Fair Housing Equal Opportunity (FHEO) requirements while hiring personnel.

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# Georgia Department of Community Affairs Organizational Chart



Descriptions of the CDBG-Michael positions are as follows<sup>1</sup>:

## **CDBG-DR Staff**

### **CDBG-DR Office Director (In place)**

The Office Director will operate under the supervision of the Community Finance Division Director. The Disaster Recovery Office Director will coordinate and provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.

The CDBG-DR Office Director directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the Georgia Department of Community Affairs. The CDBG-DR Office Director links all Federal, State and Local resources to deliver the most optimal disaster recovery objectives. The CDBG-DR Office Director works with government entities, volunteer organizations and staff to analyze data and guide programs that will assist communities in disaster recovery and resilience. In addition, the Office Director is responsible for keeping the content on DCA's disaster recovery website up to date.

### **CDBG-DR Project Manager (In place)**

The Project Manager will operate under the supervision of the CDBG-DR Office Director. The Project Manager supervises implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the State. The CDBG-DR Project Manager provides overall management, strategic operations, administrative support, and communication for the recovery effort. The Project Manager provides executive direction to ensure efficient administrative and operational oversight of readiness and field operations. Leads the conceptualization, development, coordination, and evaluations of policies to ensure program coordination guidance and policies are in alignment with State Action Plan.

### **CDBG-DR Field Program Coordinator - (In place)**

The CDBG-DR Field Program Coordinator reports to the CDBG-DR Office Director. The CDBG-DR Field Program Coordinator is responsible for monitoring and servicing complex Disaster Recovery related Community Development Programs within a designated region. The Field Program Coordinator maintains an awareness of the status of potential and existing projects and provide advice and assistance to other Community Development and Finance Division Office of Field Services and/or Office of Community Development personnel. The coordinator has duties related to oversight and compliance with 2018 CDBG-DR grants and will provide technical assistance to program administrators and local governments in the region. The coordinator will meet on-site with local officials or representative(s) to monitor for 2018 CDBG-DR program compliance. The coordinator has knowledge and experience working with CDBG, CDBG-DR and CDBG-MIT guidelines and applicable federal regulations and confer with CDBG, CDBG-DR and CDBG-MIT staff and units of local government on a regular basis to evaluate work progress and solve problems or develop solutions. The coordinator will create and deliver technical presentations associated

with 2018 CDBG-DR compliance matters for grant applications and/or grant awards. The coordinator will conduct site visits in order to verify grant application statements of need/target area conditions.

#### **CDBG-DR Mitigation Project Specialist – (To be hired)**

Under the supervision of the CDBG-DR Office Director, the CDBG-DR Mitigation Project Specialist will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.

The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development, which administers the State CDBG program. The position will be responsible for coordinating and/or supporting the State's application/request process from application development, rollout of the program, administration and coordination of the program, and closeout of the program. The Project Specialist will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc. and make recommendations for changes in procedures and other activities to accomplish program objectives and timelines. The specialist will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the specialist will assist with training on disaster assistance programs and other associated topics.

#### **CDBG-DR Program Coordinator – (to be hired)**

Under the supervision of the CDBG-DR Project Manager, the CDBG-DR Program Coordinator will be responsible for service to a complex network of Disaster Recovery related activities.

The Program Coordinator will be responsible for work products and project management techniques related to CDBG-DR activities. In addition, the position works with subrecipients, vendors, and suppliers through the process of contract management. The Program Coordinator ensures that the highest quality of customer service is provided through the CDBG-DR office and provides administrative support with regulatory compliance, project management, and policy and procedures.

#### **CDBG-DR Analyst – (In place)**

Under the supervision of the CDBG-DR Project Manager, the CDBG-DR Analyst provides technical support to staff within the CDBG-DR office; ensures that the highest quality of customer service is provided at all the delivery systems within the office; provides administrative support in areas of compliance, project management, training and development, regulations, policies and procedures. The analyst will also be responsible for coordination of outreach and visualization of program highlights.

**CDBG-DR Unmet Needs Project Specialist – (to be hired)**

Under the supervision of the CDBG-DR Project Manager, the CDBG-DR Unmet Needs Project Specialist will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.

The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development which administers the State CDBG program. The position will be responsible for coordinating and/or supporting the State's application/request process from application development, rollout of the program, administration and coordination of the program, and closeout of the program. The Project Specialist will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc. and make recommendations for changes in procedures and other activities to accomplish program objectives and timelines. The specialist will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the specialist will assist with training on disaster assistance programs and other associated topics.

**CDBG-DR Hurricane Michael Project Specialist – (to be hired)**

Under the supervision of the CDBG-DR Project Manager, the CDBG-DR Unmet Needs Project Specialist will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.

The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development which administers the State CDBG program. The position will be responsible for coordinating and/or supporting the State's application/request process from application development, rollout of the program, administration and coordination of the program, and closeout of the program. The Project Specialist will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc. and make recommendations for changes in procedures and other activities to accomplish program objectives and timelines. The specialist will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the specialist will assist with training on disaster assistance programs and other associated topics.

**Additional Support****DRGR Grants Analyst – (In Place)**

The DRGR Grants Analyst will perform highly specialized work in complex data management and statistical systems, such as the Disaster Recovery Grant Reporting (DRGR) system and DCA's Grants Management

System (GMS). The DRGR Grants Analyst will prepare databases that provide up-to-date information on the CDBG-DR and CDBG-MIT activities that are underway, including funding data.

This position will also conduct desk reviews of all CDBG-DR and CDBG-MIT subrecipient draw requests, including supporting documentation and recommend approval to the Office Director or other designee. Upon approval, the DRGR Grants Analyst will draw funds from HUD using the DRGR system.

#### **CDBG Office Director – (In place)**

Oversees program implementation, compliance, grants management services, and finance services for the Division. The Director manages all CDBG personnel.

#### **CDBG Compliance Officer – (In place)**

The Compliance Officer supervises, coordinates and reviews the work of the CDBG Compliance staff and field staff. Additionally, the Officer reviews applicable laws, regulations and HUD monitoring guidance and develops forms, reports and procedures to implement requirements. The Officer serves as the subject matter expert in the following areas: The Housing and Community Development Act of 1974, as amended, and implementing regulations, federal financial management regulations, national Environmental Policy Act of 1969 and implementing regulations, the National Historic Preservation Act of 1966 and implementing regulations, labor laws, e.g., the Davis Bacon Act, the Contract Work Hours and Safety Standards Act, and the Copeland “Anti-Kickback” Act, acquisition and relocation laws and regulations, e.g., The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, State of Georgia Procurement law – O.C.G.A. 36-91.

#### **CDBG Admin/Payments – (In place)**

Existing CDBG financial management staff will maintain internal financial records on the Grant Management System (GMS) and provide support for all internal invoice review and approval. The staff will recommend approval and draw funds from HUD using the DRGR database upon approval from the applicable Office Director or other designee. The staff will also serve as the final check on all draw information prior to entry into the GMS and DRGR database.

#### **Senior Community Development Policy Analyst – (In place)**

The Senior Community Development Policy Analyst assists with developing manual practices, policy and procedures that interpret applicable Federal and State statutes, Action Plans, rules and regulations governing Community Development Block Grant-Disaster Recovery Program (CDBG-DR) and CDBG-MIT eligibility.

#### **GIS and Research Analyst – (In place)**

The analyst will collect and interpret geographic information provided by geodetic surveys, aerial photos and satellite data. The analyst will evaluate, measure and record geospatial data using geographic

information systems software and related hardware and software specific to the area of assignment. The analyst will create or maintain GIS databases and cartographic products. The incumbent will perform geospatial analyses of moderate complexity and presents data in cartographic form. The analyst will monitor adherence to policies and procedures and obtain existing geographic information databases.

#### **DCA Office of Finance - (In place)**

The Finance Manager and support staff are responsible for managing both grants and contracts for agency services and monitoring compliance with contractual provisions. The office performs managerial and professional duties in accounting, budgeting and finance. The Chief Financial Officer directs and oversees all aspects of the Finance, Procurement and Accounting functions of the programs at the Department. This position is responsible for directing the development and establishment of policies and procedures as it pertains to finance and accounting.

#### **Director of Legal Services - (In place)**

The Director of Legal Services provides legal guidance to the CDBG-DR teams on the development of disaster recovery plans, policies, and the implementation of activities.

#### **Internal Auditor – (In place)**

The Internal Auditor performs audits or oversee audits of financial records, electronic data processing systems, and program activities and operations to ascertain financial status, accuracy of data, efficiency, or compliance with laws and regulations. In addition, the Internal Auditor will evaluations of the administrative, financial, and operational activities of the program and provide required updates to HUD. The Internal Auditor reports to the Chief Operating Officer of DCA.



Appendix C: Action Plan Certifications

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**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 D: SF-424

DRAFT

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

Application for Federal Assistance SF-424		
<p><b>* 1. Type of Submission:</b></p> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<p><b>* 2. Type of Application:</b></p> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<p>* If Revision, select appropriate letter(s):</p> <input type="text"/>		
<p>* Other (Specify):</p> <input type="text"/>		
<p>* 3. Date Received:</p> <input type="text"/>		<p>4. Applicant Identifier:</p> <input type="text"/>
<p>5a. Federal Entity Identifier:</p> <input type="text"/>		<p>5b. Federal Award Identifier:</p> <input type="text"/>
<p><b>State Use Only:</b></p>		
<p>6. Date Received by State:</p> <input type="text"/>		<p>7. State Application Identifier:</p> <input type="text"/>
<p><b>8. APPLICANT INFORMATION:</b></p>		
<p>* a. Legal Name: Georgia Department of Community Affairs</p>		
<p>* b. Employer/Taxpayer Identification Number (EIN/TIN):</p> <p>58-1259426</p>		<p>* c. Organizational DUNS:</p> <p>807479084</p>
<p><b>d. Address:</b></p>		
<p>* Street1: 60 Executive Park South NE</p>		
<p>Street2:</p> <input type="text"/>		
<p>* City: Atlanta</p>		
<p>County/Parish:</p> <input type="text"/>		
<p>* State: GA: Georgia</p>		
<p>Province:</p> <input type="text"/>		
<p>* Country:</p> <input type="text"/>		
<p>* Zip / Postal Code: 30329</p>		
<p><b>e. Organizational Unit:</b></p>		
<p>Department Name:</p> <p>Grant Administration</p>		<p>Division Name:</p> <p>Community Finance Division</p>
<p><b>f. Name and contact information of person to be contacted on matters involving this application:</b></p>		
<p>Prefix: Mr.</p>		<p>* First Name: Tommy</p>
<p>Middle Name:</p> <input type="text"/>		
<p>* Last Name: Lowmon</p>		
<p>Suffix:</p> <input type="text"/>		
<p>Title: Director, CDBG-DR Program</p>		
<p>Organizational Affiliation:</p> <input type="text"/>		
<p>* Telephone Number: 404-977-0929</p>		<p>Fax Number:</p> <input type="text"/>
<p>* Email: tommy.lowmon@dca.ga.gov</p>		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b>		
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"/>		
<b>* 10. Name of Federal Agency:</b>		
Department of Housing and Urban Development		
<b>11. Catalog of Federal Domestic Assistance Number:</b>		
14.228		
CFDA Title:		
<input type="text"/>		
<b>* 12. Funding Opportunity Number:</b>		
85 FR 4681		
* Title:		
CDBG-DR 4400		
<b>13. Competition Identification Number:</b>		
NA		
Title:		
<input type="text"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b>		
<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>
	<input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b>		
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	
<b>16. Congressional Districts Of:</b>	
* 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"/>	
<b>17. Proposed Project:</b>	
* a. Start Date:	10/10/2021
* b. End Date:	10/10/2027
<b>18. Estimated Funding (\$):</b>	
* a. Federal	41,837,000
* b. Applicant	0
* c. State	0
* d. Local	0
* e. Other	0
* f. Program Income	0
* g. TOTAL	
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<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.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<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"/>	
<b>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)</b>	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** 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.</small>	
<b>Authorized Representative:</b>	
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 E: MID Expansion Request

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DRAFT

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](mailto:tommy.lowmon@dca.ga.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Tommy Lowmon", with a long horizontal flourish extending to the right.

Tommy Lowmon  
Director, CDBG-DR Program

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

Enclosures

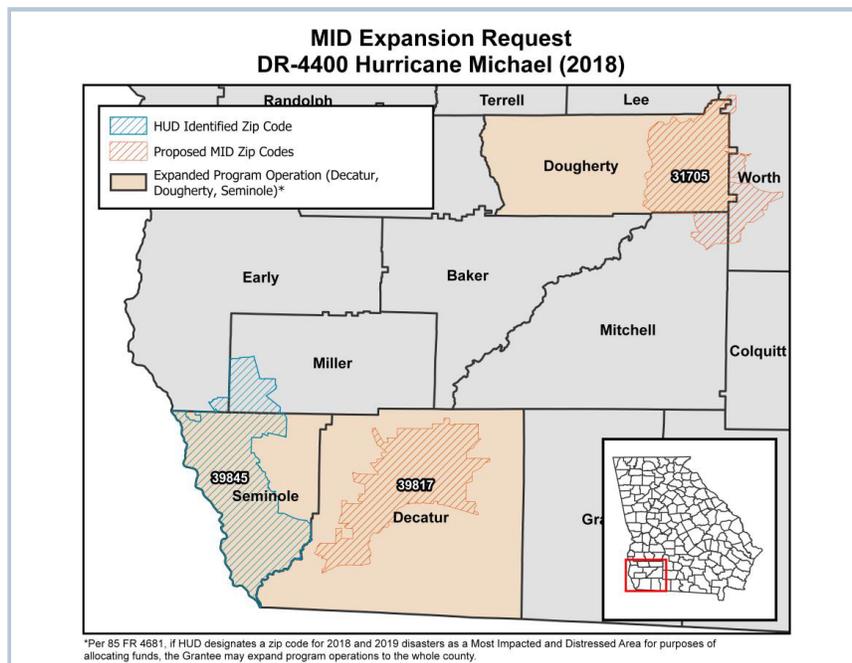
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**MID Expansion Data | 2018 CDBG-DR Allocation**

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.

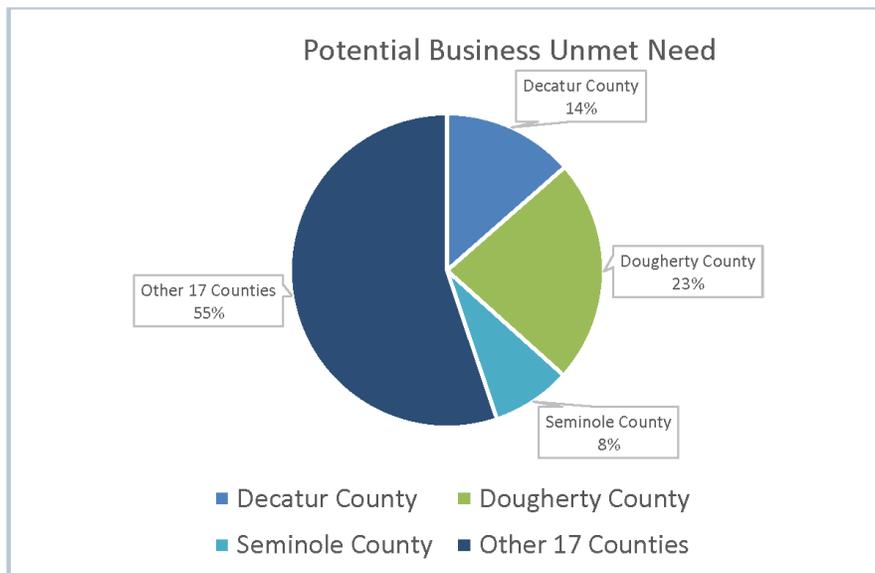
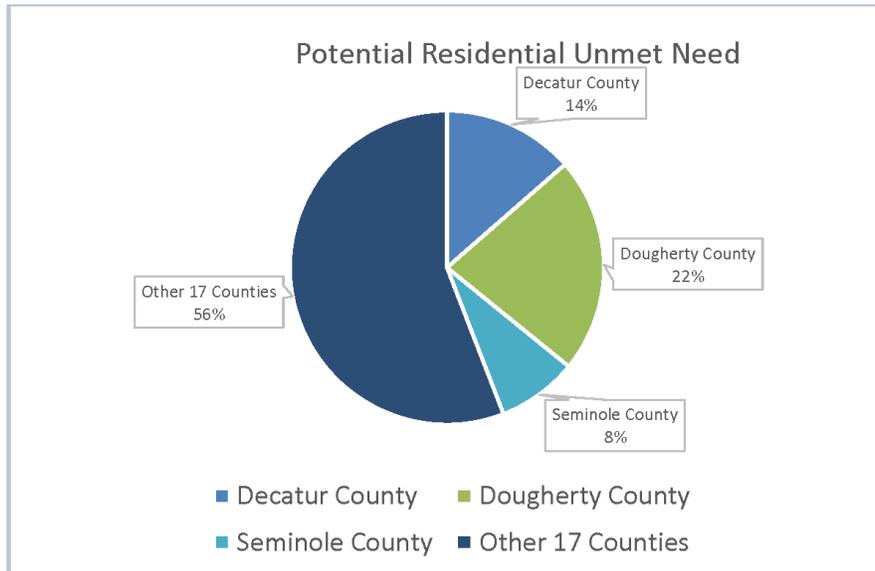


As seen in Table 1 below, Seminole County, Dougherty County, and Decatur County are the top three ranking communities within each of the unmet needs categories. Column 1 shows the unmet needs stemming from SBA declined or withdrawn applications. The number of declined or withdrawn applications was multiplied 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.**

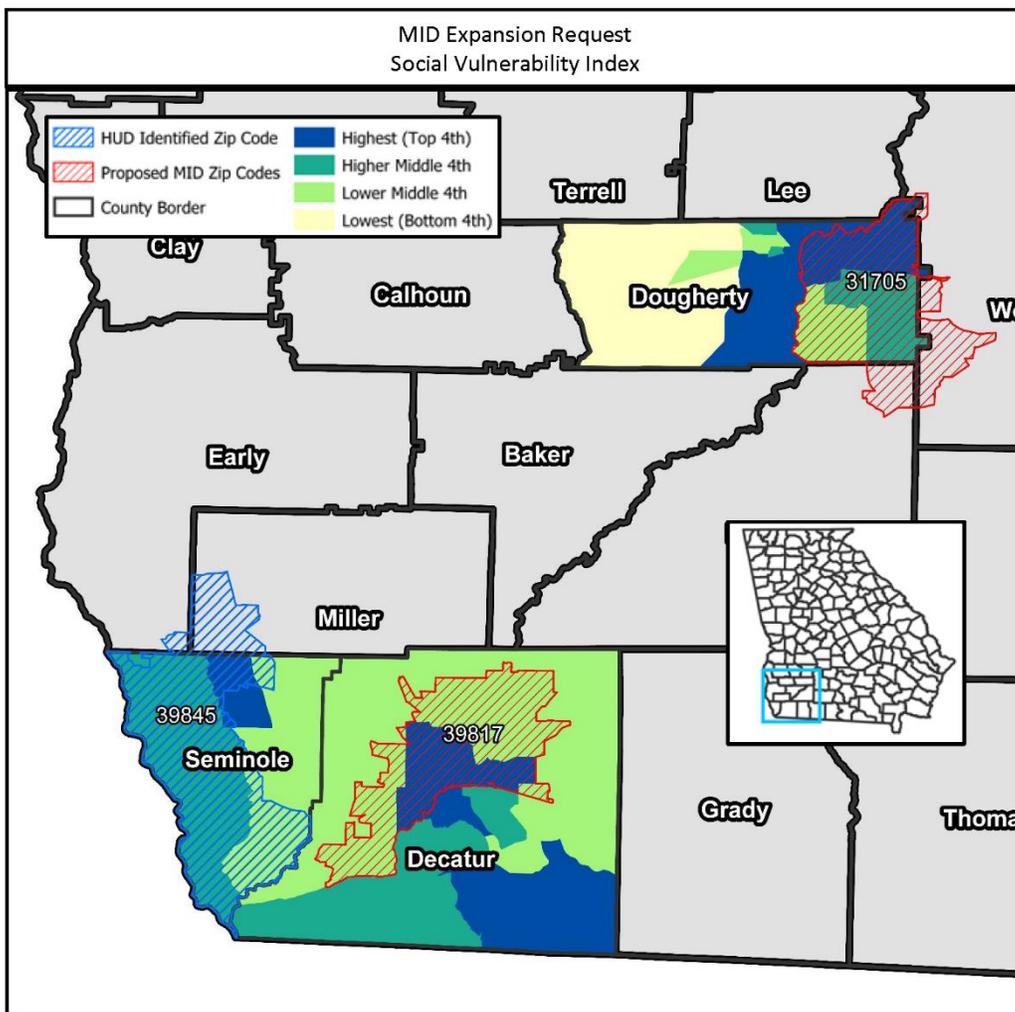
<b>Table 1: Potential Unmet Needs</b>				
Rank	SBA Declined Loans	FEMA Referrals to SBA, Did not apply x multiplier	Declined SBA Applicants x multiplier	FEMA Referrals to SBA, Did not apply x multiplier
	<i>Residential</i>	<i>Residential</i>	<i>Business</i>	<i>Business</i>
1	Dougherty \$20,462,400	Dougherty \$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 F: Action Plan Comments and Responses

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