SOUTH CAROLINA ACTION PLAN FOR DISASTER RECOVERY

Disaster Relief Appropriations Act
Public Law 114-113

Submitted to HUD for Review:

July 19, 2016

South Carolina Disaster Recovery Office (SCDRO)

of the

South Carolina Department of Commerce

Amendment #2

May 30, 2017

Amendment 2 updates to Action Plan (May, 25 2017)

Previous Page #	New Page #	Section	Change/Addition/Deletion
11	11	Counties Eligible for Assistance: State Government Area of Responsibility (SGAOR)	Adds Clarendon County as a Most Impacted and Distressed County.
67	67	Program Budget	Adds Clarendon County as Most Impacted and Distressed County.
72	72	Single Family Housing Program	Updates information around the Priority 1 criteria to consider multiple disabilities.
73	73	Single Family Housing Program	Updates information related to stick-built repairs/rehabilitation program caps from $25,000 to $30,000.
73	73	Single Family Housing Program	Updates information related to manufactured housing unit repairs/rehabilitation program caps ($15,000).
73	73	Single Family Housing Program	Indicates additional allowable cost of ADA manufactured housing units.
73	73/74	Single Family Housing Program	Indicates that $90,000 reconstruction may include stick-built as well as modular solutions and contains updates around additional items allowable above stated cap.
75	75	Single Family Housing Program	Clarifies program policy for applicants in FEMA non-compliant statuses.
90	90	Duplication of Benefit	Adds an additional check for SBA loans declined by applicants and indicates that this may affect program participation.

Amendment 1 updates to Action Plan (February, 15 2017)

<table>
<tr><th>Previous Page #</th><th>New Page #</th><th>Section</th><th>Change/Addition/Deletion</th></tr>
<tr><td>~~11~~</td><td>~~11~~</td><td>~~Counties Eligible for Assistance: State Government Area of Responsibility (SGAOR)~~</td><td>~~Adds note indicating a Waiver has been submitted to HUD regarding Clarendon County.~~</td></tr>
<tr><td>53</td><td>53</td><td>Infrastructure Impact</td><td>Clarified that the FEMA Dam Assessment may determine if additional HMGP funds are needed.</td></tr>
<tr><td>57</td><td>56</td><td>HMGP Description</td><td>Adds discussion of requests for HMGP matching funds.</td></tr>
<tr><td>65</td><td>65</td><td>Program Budget</td><td>Reallocates $2.1 million in funds to the Single Family Housing Program from the HMGP Match Program and eliminates the HMGP Match Program.
<table>
<tr><th>Program</th><th>Amount Allocated</th><th>Amendment 1</th></tr>
<tr><td>Single Family Housing Program</td><td>~~$88,135,650~~</td><td>$90,235,6</td></tr>
<tr><td>Rental Repair Program</td><td>$1,000,000</td><td>$1,000,00</td></tr>
<tr><td>~~HMGP Match~~</td><td>~~$2,100,000~~</td><td>$0</td></tr>
<tr><td>Planning</td><td>$750,000</td><td>$750,000</td></tr>
<tr><td>Program</td><td>$4,841,350</td><td>$4,841,35</td></tr>
<tr><td>TOTAL</td><td>$96,827,000</td><td>$96,827,0</td></tr>
</table></td></tr>
<tr><td>65</td><td>65</td><td>Counties Eligible for Assistance: State Government Area of Responsibility</td><td>Adds note indicating a Waiver has been submitted to HUD regarding Clarendon County.</td></tr>
<tr><td>67</td><td>66</td><td>Housing Program</td><td>Removes discussion of HMGP program funds.</td></tr>
<tr><td>72</td><td>72</td><td>Basis for Calculating Housing Assistance Awards</td><td>Adds footnote clarifying applicability of the Uniform Relocation Act</td></tr>
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<tr><td>73</td><td>72</td><td>Basis for Calculating Housing Assistance Awards</td><td>Adds statement regarding limited temporary relocation assistance provided to Applicants</td></tr>
<tr><td>74</td><td>74</td><td>Hazard Mitigation Grant Program (HMGP)</td><td>Deletes HMGP section</td></tr>
<tr><td>142-146</td><td>150-158</td><td>Appendix: Expenditure and Production Timeline Projections</td><td>Updates the Financial and Production Projections</td></tr>
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Revision 1 updates to Action Plan (16 September 2016)

Previous Page #	New Page #	Section	Change/Addition/Deletion
11	12	Counties Eligible for Assistance: State Government Area of Responsibility (SGAOR)	Adds a discussion of how the State uses SoVI.
31	31	Summary of Impact and Unmet Need	Clarifies focus on housing as greatest need.
45	46-47	Housing Trust Fund for the South Carolina Flood Initiative	Clarifies available programs to leverage funds
52	54	Public Assistance	Adds mathematical formula for clarity
61	64	CDBG-DR National Objectives	Adds discussion of expending all funds on LMI 80% and below
63	67	Housing Programs	Adds discussion of local capacity to process permits
65	69	Single Family Housing Program	Adds discussion on responsibility of inspection documentation
65	69-70	Single Family Housing Program	Adds discussion on options for proving primary residency of a household
67	67-68	Specifications	Changed to clarify the term “green building standards”
66	71	Basis for Calculating Housing Assistance	Adds discussion of escrowing DOB funds
67	73	Single Family Housing – Flood Insurance and Elevation	Adds the SC Disaster Recovery Board decision to provide one year of flood insurance
67	72	Single Family Housing Program- Basis for Calculating Housing Assistance Awards	Adds discussion on how the State will address special needs individuals
68	72	Single Family Housing- Basis for Calculating Housing Assistance	Adds discussion on using pre-disaster value and appealing property valuation.
68	73	Affordable Rental Investment	Clarifies the State’s intent and focus
70	75	Public Hearings	Adds discussion of Spanish availability at Town Halls
74	79	Program Income	Explains how to treat unexpected program income
74	80	Pre-agreement Activities	Expanded section to clarify Pre-Award, Pre-Agreement, and Reimbursement costs
74	79	State Outreach	Adds discussion of language capabilities at intake
83	89	Management of Funds	Clarifies who performs the management and auditing functions
84	90	Management of Funds	Adds a list of ineligible activities
88-91	95-98	Capacity Assessment & Staffing	Updates hiring of positions
92	99-100	Technical Assistance	Adds mention of coordination with SC SHPO
93	101	Accountability	Clarifies the State’s capacity to oversee the contractor
142-146	150-158	Appendix: Expenditure and Production Timeline Projections	Updates the Financial and Production Projections
147	159-160	Key Program Terms	Adds definition of US Citizen and Lawful Permanent Resident
147	160	Key Program Terms	Adds definition of recipient.
147	159	Key Program Terms	Adds MHU (Manufactured Home Unit) or Mobile Home

STATE OF SOUTH CAROLINA: ACTION PLAN FOR DISASTER RECOVERY

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The South Carolina Disaster Recovery Program operates in Accordance With the Federal Fair Housing Law (The Fair Housing Amendments Act of 1988)

Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination: 1-800-669-9777 (Toll Free) 1-800-927-9275 (TTY)

www.hud.gov/fairhousing

U.S. Department of Housing and Urban Development Assistant Secretary for Fair Housing and Equal Opportunity Washington, D.C. 20410

or

Columbia, SC Fair Housing and Equal Opportunity (FHEO) Field Office
1835 Assembly Street
Columbia, SC 29201
Phone: (803) 765-5938
Fax: (803) 253-3281

Section 1: Introduction

In October 2015, South Carolina received unprecedented and historical rainfall and flooding. This heavy rainfall of over 20 inches across the State came from an upper atmospheric low-pressure system that funneled tropical moisture from Hurricane Joaquin. The floods caused loss of life and extensive damage to many dams, bridges, roads, homes, and businesses. Thousands of National Guard troops, hundreds of State Troopers, the Coast Guard and assessment crews were activated to respond to this historic flooding. There were many residents rescued from their homes and others were assisted in evacuation efforts by National Guardsman as well the Coast Guard.

There was severe erosion on the beaches of northeast South Carolina as well as losses suffered in the agricultural industry statewide. Although damaged businesses faced a 4-6 week disruption, many stepped up to give back to their communities. Free meals were prepared and given out to flood victims by volunteers. First responders as well as many residents were given discounts on needed services to ease financial hardship. Many automobiles were submerged in the flood water, and access to and from communities was brought to a standstill, further complicating recovery and response efforts.

Damage from these floods was monumental. The flooding also impacted utilities, wastewater treatment systems, and drinking water treatment and collection systems. Because the ground surfaces were already saturated from rainfall in September that caused rivers to rise, an estimated 52 dams statewide were impacted and over 541 roads were closed, some collapsed.

Just as South Carolina was beginning their recovery effort, it was estimated that rain would continue to fall for several more days while residents were awaiting the waterways to crest. Families, including many of low-to-moderate income, had to abandon their homes, and many houses were isolated as a result of significant damage to roads and bridges. Contaminated drinking water systems posed a threat to public health, and sewage, industrial runoff, and pollutants seeped into the environment. As a result, 400,000 residents were under a boil-water advisory that affected approximately 16 water systems.

As the State begins its recovery efforts, the focus of putting residents back in their homes will be key. South Carolinians have come together to help each other in the wake of this disaster. Many residents assisted with the needs of the most vulnerable populations, and there has been an outpouring of assistance for the elderly, disabled, or those families in greatest need. The State, local governments, and volunteer organizations are working unceasingly to support individuals and families who require basic services and to address conditions of immediate need. State and local government agencies, as well as civic organizations and community leaders will continue to address the fiscal, social and environmental challenges of this event for years to come.

Background

The Disaster Relief Appropriations Act of 2016 (Pub. L. 114-113, approved December 18, 2015) (Appropriations Act) was enacted to appropriate federal funds for disaster relief. The Act gives monies to States or units of general local government (UGLGs) for disaster recovery efforts in the affected areas. The federal government appropriated $300 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to be made available to the various states that were declared a major disaster by the President of the United States in 2015. These funds are to be used in order to satisfy a portion of unmet need that still remains after other federal assistance, such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), or private insurance, has been allocated.

The Department of Housing and Urban Development (HUD) uses the "best available" data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure, and housing and economic revitalization. **Based on this assessment, HUD notified the State of South Carolina that it will receive an allocation of $96,827,000 in disaster recovery funds to assist in recovery from the floods.** In addition, Richland County, Lexington County and the City of Columbia will receive separate allocations of $23,516,000; $16,332,000; and $19,989,000, respectively, to address recovery needs in those jurisdictions.

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within six years of the signed agreement between HUD and the grantee unless an extension is granted by HUD. In order to ensure that the funds assist the most impacted areas, at least 80 percent of the combined total awarded to the State will go to the most impacted and distressed counties. All of the allocated funds must be used for eligible disaster-related activities. To ensure that fraud, waste, and misuse of funds does not occur, effective controls must be in place and monitored for compliance.

The South Carolina Department of Commerce has been designated by Governor Nikki Haley as the responsible entity for administering the CDBG-DR funds allocated to the State.

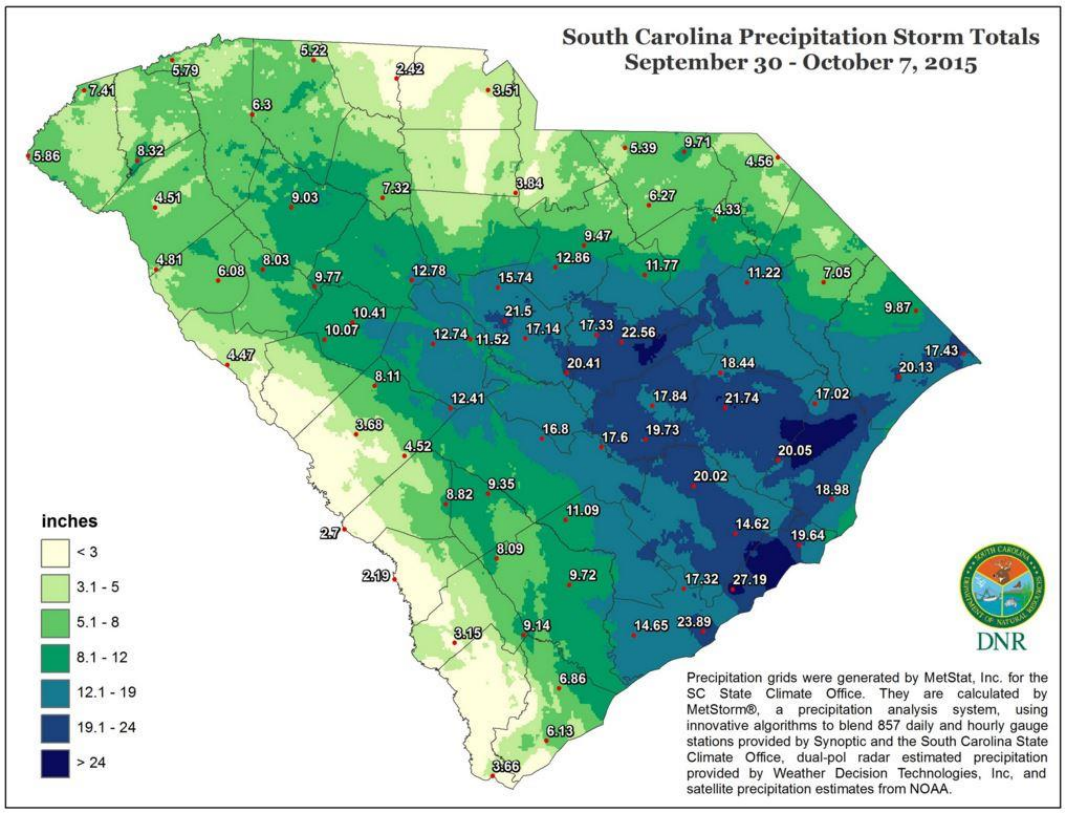
As required by HUD, South Carolina submits this Action Plan to outline its unmet needs, and establish how the State will allocate its funds through its programs. This includes the proposed use of funds, criteria for eligibility, and how funds will address long-term recovery in the most impacted and distressed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

Section 2: South Carolina Disaster Recovery Program

Community Profile: Summary of Impact and Presidentially Declared Counties

The disaster was an event of unprecedented impact from water. The state has 16 major rivers, 9 lakes and a plethora of tributaries webbing across its geography disbursing water to all communities, especially in the southern region. Heavy, continual rain stalled over the majority of the state, causing widespread, massive flooding. More than 33,100 homes received more than one-foot of flood water in the home.[1] **Importantly, however, the disaster was not just a flood event.** It was also a rain event that caused impact to homes from above, with some homeowners reporting rain that blew in sideways, causing damage to roofs and walls that they never expected. This factor has complicated the recovery process in that damage can not only be assessed from below, measuring flood damage, but must consider rain damage as well.

Large portions of the state received sustained, record-breaking rainfall, with several areas receiving over 19 inches of rain. Additionally, there were significant concentrations where more than 24 inches of rainfall was recorded. The map below, created by the South Carolina State Climate Office at the Department of Natural Resources, illustrates the extent and severity of the rain event.



[1] FEMA EOMMR data

A major disaster declaration was issued for the State of South Carolina on October 5, 2015. The declaration for FEMA 4241 included the following counties:

County	Individual Assistance	Public Assistance
Abbeville		Declared
Aiken		Declared
Allendale		Declared
Anderson		Declared
Bamberg	Declared	Declared
Beaufort		Declared
Berkeley	Declared	Declared
Calhoun	Declared	Declared
Charleston	Declared	Declared
Chesterfield		Declared
Clarendon	Declared	Declared
Colleton	Declared	Declared
Darlington	Declared	Declared
Dillon		Declared
Dorchester	Declared	Declared
Fairfield	Declared	Declared
Florence	Declared	Declared
Georgetown	Declared	Declared
Greenville	Declared	
Greenwood	Declared	Declared
Horry	Declared	Declared
Kershaw	Declared	Declared
Lancaster		Declared
Laurens		Declared
Lee	Declared	Declared
*Lexington**	Declared	Declared
Marion	Declared	Declared
Marlboro		Declared
McCormick		Declared
Newberry	Declared	Declared
Orangeburg	Declared	Declared
*Richland**	Declared	Declared
Saluda		Declared
Spartanburg	Declared	Declared
Sumter	Declared	Declared
Williamsburg	Declared	Declared
Total:	**24**	**35**

*Note: *This report assesses the declared counties served by the State's allocation, which does not include Richland and Lexington counties. Richland and Lexington counties will be addressed separately by those counties in their own assessments.*

Counties Eligible for Assistance: State Government Area of Responsibility (SGAOR)

Although 24 counties received FEMA Individual Housing (IA) assistance as part of the statewide declared event, **the South Carolina Disaster Recovery Office (SCDRO), administered by the State of South Carolina through the Department of Commerce, will provide assistance to eligible applicants in the following 22 counties only**:

Bamberg	Greenwood
Berkeley	Greenville
Calhoun	Horry
Charleston	Kershaw
Clarendon	Lee
Colleton	Marion
Darlington	Newberry
Dorchester	Orangeburg
Fairfield	Spartanburg
Florence	Sumter
Georgetown	Williamsburg

This 22-county service area will be referred to as the **State Government Area of Responsibility (SGAOR)** throughout the rest of this Action Plan.

HUD has provided the State of South Carolina with $96,827,000 in disaster recovery funds to assist in recovery from the floods. This Action Plan for Disaster Recovery will speak to the programs and service areas governed by these funds. HUD has further stipulated that 80% of the allocation, or $65,494,200, must address unmet needs within the following sub-set of counties:

Charleston, Dorchester, Florence, Georgetown, Horry, Lexington*[2], Richland*, Sumter, Williamsburg, Clarendon

~~*A waiver has been requested to HUD for Clarendon County to be included within the 80% of the allocation, or $65,494,200. Upon waiver approval, Clarendon County will be presumed to be part of the Most Impacted and Distressed 80% set-aside.~~

A waiver has been approved by HUD adding Clarendon County to be included within the Most Impacted and Distressed counties which will cumulatively receive 80% of the allocation, or $65,494,200.

Although HUD has included Richland and Lexington counties in this set-aside requirement, the Governor-appointed Disaster Recovery Board, after careful and thorough analysis, will not provide a portion of state recovery funds to Richland County, Lexington County, nor the City of Columbia. The board made the decision based upon the facts below:

- Richland, Lexington, and the City of Columbia are all grantees under the federal appropriation and are currently receiving funding directly from HUD in the following amounts:
    - Richland County: $23,516,000
    - Lexington County: $16,332,000
    - City of Columbia: $19,989,000

In essence, this means that these three jurisdictions are receiving 38 percent of the $156,664,000 in funding allocated by HUD for recovery in the State of South Carolina, leaving only 62 percent to be distributed within the other 22 impacted counties.

- The State partnered with the University of South Carolina's Hazard and Vulnerability Research Institute (HVRI) to identify those areas most impacted and most vulnerable across the State. One of HVRI's signature products, the Social Vulnerability Index (SoVI®), informed this process by empirically delineating the most socially vulnerable census tracts within each IA designated county. **Residents in these high vulnerability areas generally have a lower ability to adequately prepare for, respond to, and rebound from environmental impacts (such as floods), shocks, and stresses.**

  Utilizing social vulnerability information in concert with FEMA damage data provides a standardized, replicable, and pragmatic process for understanding where scare resources would be most helpful in driving successful disaster recovery. This procedure resulted in a visualization

[2] Lexington and Richland Counties are not part of the State Government Area of Responsibility (SGAOR) for reasons described in this Action Plan.

of loss/vulnerability for the state where places with high population such as Lexington and Richland Counties, are characterized by a general attenuation of impacts due to lower levels of social vulnerability. **Conversely, populations residing in the lower Conagree and Wateree River basins, although much less heavily populated, are characterized by generally higher levels of social vulnerability.** Targeting resources to these most heavily impacted and vulnerable areas will yield the highest benefit because these areas will be much less able to bounce back without outside assistance. While there was damage in both Richland and Lexington counties, the damage (according to an extensive analysis of FEMA Verified Loss Data) outside of these areas is more extensive, especially when compounded with an inability to bounce back (social vulnerability).

To further illustrate the significant need amongst the vulnerable population in the SGAOR 22-county area, any county that has more than 1/3 (33%) of its damaged homes in High SoVI® areas is a priority for SCDRO, as illustrated in the table below:

Social Vulnerability: Counties that have more than 1/3 (33%) of its damaged homes in High SoVI® areas, by percent

COUNTY	High	Medium	Low
Charleston	30.72%	32.79%	36.49%
Dorchester	15.58%	52.41%	32.02%
Florence	52.99%	39.36%	7.64%
Georgetown	88.72%	10.40%	0.87%
Horry	38.05%	58.36%	3.59%
Lexington	24.86%	40.28%	34.86%
Richland	30.89%	31.53%	37.58%
Sumter	42.93%	37.39%	19.68%
Williamsburg	93.76%	6.24%	0.00%
Grand Total	43.72%	33.49%	22.79%

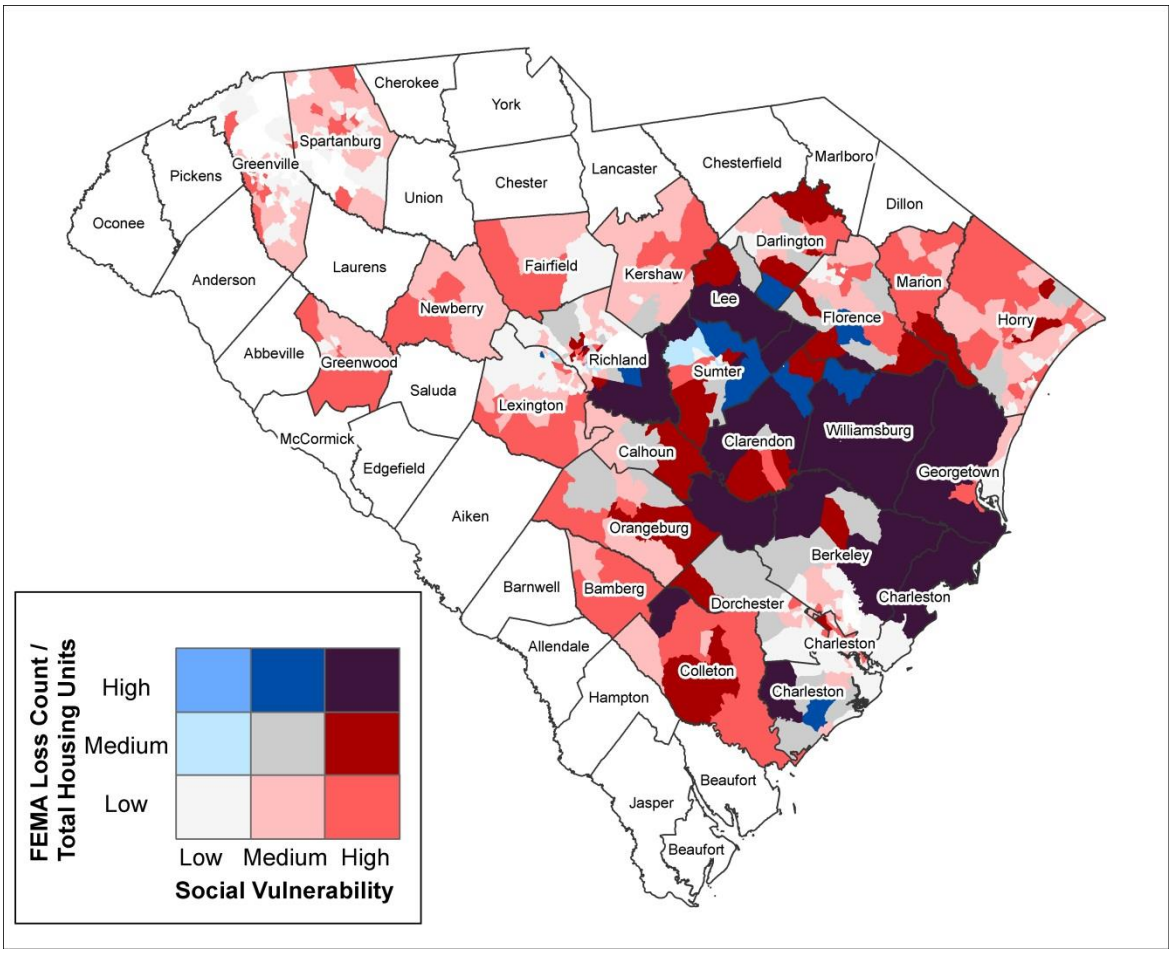
SCDRO obtained from FEMA an address list of Individual Assistance (IA) applicants and identified those applicants with at least $5,000 in verified structural damage. Using FEMA damage data, each $5,000 or greater loss was pinpointed on a map. These "hot spots" of FEMA verified loss were overlaid on SoVI®[3] to identify areas that were both heavily impacted and had a lower capacity to absorb such losses.

The State uses SoVI as an assessment and targeting tool. It allows the State as to identify where those who are the most vulnerable citizens are located. These are the citizens who are the least likely to run away from a disaster. They are also the citizens who are the least likely to have the ability to recover themselves. SoVI also allows the State to target the efforts of recovery, such as application intake and

[3] SoVI®, or the Social Vulnerability Index, is discussed in great detail in the Unmet Needs Assessment portion of this plan.

VOAD activities. When over laid with the rain fall information, SoVI provides a graphic representation of where the disaster impacted the most vulnerable citizens of South Carolina. The State will use this information as part of a holistic recovery approach. SoVI will allow the State to direct the implementation vendor to locations where intakes center can have the greatest chance of collecting from large populations of impacted citizens.

Bivariate Overlay of Damaged Housing Units & Social Vulnerability



This geographic overlay, combining areas of highest vulnerability with the areas containing significant numbers of damaged homes[4], shown in the map above, clearly indicates that the counties in the Wateree and Congaree watersheds in the east central part of the state **not only contain the highest rate of damaged homes but often also have the highest social vulnerability. Targeting support to these areas in the immediate and long-term recovery phases of the flood disaster will yield the best outcomes for**

[4] Normalizing the number of homes damaged by the total number of homes in an area creates an "apples to apples" comparison, enabling the state to rank order damage in relation to social vulnerability – effectively creating a targeting capability for use by recovery personnel operating on the ground.

those with the highest need. The comprehensive analysis of Unmet Needs is discussed in great detail in *Section 3: Unmet Needs Assessment* of this Action Plan for Disaster Recovery.

Unmet Needs Assessment

Section 3: Unmet Needs Assessment

Resiliency & Strategic Planning

The state has conducted intensive recovery planning in order to guide its long-term recovery efforts. This has been done by leveraging strong leadership to bring together a multitude of state agency, civic, federal and public stakeholders.

The process established by the National Disaster Recovery Framework served as a key component of the initial planning structure. This included FEMA's deployment of an (AET) Advance Evaluation Team whose mission it was to conduct a preliminary assessment and to determine which Recovery Support Functions (RSFs) to activate. The AET report, released in November 2015, was followed by a Mission Scoping Assessment, which served to identify and prioritize the recovery needs to be addressed by the RSFs and to identify any recovery capacity gaps in need of support. After the groundwork laid by the AET and the Mission Scoping Assessment, the State worked intensely to develop a Recovery Support Strategy (RSS) through the Federal Interagency Recovery Coordination group. The RSS outlined initial estimates of storm and flood impact across many sectors, as well as identifying a host of possible goals, strategies, and potential actions.

The RSS includes information vital to properly guiding the long-term recovery process. This Unmet Needs Assessment builds from the knowledge gained through the RSS to inform the CDBG-DR recovery efforts, and unify those efforts with those of other federal programs in order to develop an integrated approach to recovery.

In addition, the State took its own initiative to outline South Carolina's Disaster Recovery Framework. The State has assigned a State Disaster Recovery Coordinator to the overall coordination of long-term recovery efforts. In addition, the State will also have six RSFs that will address issues of concern within their functional areas:

- Community Planning and Capacity Building
- Economic Recovery
- Health and Social Services
- Housing Recovery
- Infrastructure Systems Recovery
- Natural and Cultural Resources

These efforts will address the **Whole Community Concept**, involving National Preparedness Goals for a broader scope of participants. By building from the planning work and stakeholder involvement conducted to date, the Unmet Needs Assessment performed for CDBG-DR is maximizing the efficient use of federal taxpayer dollars already spent on the local recovery process.

South Carolina is leading the way in streamlining the transition process between state and federal stakeholders, from response to long-term recovery. **While the RSS outlined an array of observations and recommendations, the Unmet Needs Assessment and corresponding Action Plan for Disaster Recovery will put targeted, actionable programs in place.**

Building Resilience in the Communities

South Carolina is operating under a comprehensive Resilience Framework, which includes a targeted emphasis on local capacity building and increasing household resilience and security through safe, decent, and sanitary housing.

Nationally, resilience is often considered from an urban framework. In South Carolina, however, it is imperative to view resilience from the rural and agricultural heritage that is the foundation of the state. What works in an urban environment may not be the right approach to addressing long-term resilience, and to adequately build from local strengths and local knowledge that are abundant in rural areas. When compared to urban centers, rural communities often have greater elderly populations and higher poverty levels, and are more dispersed geographically. This may make traditional, urban-centered approaches to resilience, such as large-scale drainage or infrastructure projects, less feasible when considering cost-benefit-analysis and the greatest impact of limited recovery dollars.

Additionally, the strengths of social networks in rural areas, and their importance in resilience and recovery, is underscored by researchers in rural disaster recovery. A rural research portal maintained by Sam Houston State University provides that:

> *"…networks are the vehicles by which a community's inherent resilience is sustained. Inherent resilience is defined as the practices deployed by residents to cope with disruptions that are retained in their collective memory (Colten et al. 2012). These practices involve traditional knowledge of the environment…. These types of practices are distinct from formalized, often government-directed, action that involves emergency management or other agency officials in disaster planning and capacity-building. Rather inherent resilience entails solutions developed by residents to cope and recover that are deployed within kin and local social networks."*[5]

Keeping communities together by investing in recovery that allows these social ties to remain strong is key to long-term resilience.

Demographic Profile of the Impacted Area

Over half (56%) of the South Carolina population resides in the SGAOR impacted area covered in this assessment (FEMA-4241 declared counties with the exception of Lexington and Richland). The population in the SGAOR area differs from the statewide population in several key areas.

The state-assessed area has a higher percentage of residents over the age of 65, a much lower degree of residents with a Bachelor's degree, a higher percentage of individuals with disabilities, and a higher percentage of individuals without health insurance. This means that when compared to the state as a

[5] Dr. Ashley D. Ross, Sam Houston State University. https://localdisresilience.com/rural/

whole, there is a higher relative concentration of individuals with vulnerability factors in the state-assessed area, farther from the resources of the central cities.

In addition, the African American population in the state-assessed SGAOR area is 39.6% in comparison to the 27% statewide average. The median household income is $39,762 in comparison to the statewide median income of $45,033; the per capita income is lower, and the percentage of persons living in poverty is higher.

Demographic Profile Information - American Community Survey Data, 2014 Release

People	South Carolina - Statewide	SGAOR
Population estimates, July 1, 2015	4,896,146.00	2,722,881.00
Persons under 5 years, percent, July 1, 2014	6.00	5.84
Persons 65 years and over, percent, July 1, 2014	15.80	16.98
White alone, percent, July 1, 2014	68.30	57.28
Black or African American alone, percent, July 1, 2014	27.80	39.64
American Indian and Alaska Native alone, percent, July 1, 2014	0.50	0.52
Asian alone, percent, July 1, 2014	1.50	1.00
Native Hawaiian and Other Pacific Islander alone, percent, July 1, 2014	0.10	0.09
Two or More Races, percent, July 1, 2014	1.70	1.44
Hispanic or Latino, percent, July 1, 2014	5.40	4.18
White alone, not Hispanic or Latino, percent, July 1, 2014	63.90	54.04
Foreign born persons, percent, 2010-2014	4.80	3.46
Housing units, July 1, 2014	2,188,129.00	1,240,405.00
Owner-occupied housing unit rate, 2010-2014	68.60	70.69
Median value of owner-occupied housing units, 2010-2014	137,600.00	113,326
Median gross rent, 2010-2014	784.00	707.78
Building permits, 2014	27,537.00	15,636.00
Households, 2010-2014	1,795,715.00	999,278.00
Persons per household, 2010-2014	2.56	2.57
Language other than English spoken at home, percent of persons age 5 years+, 2010-2014	6.90	5.15
High school graduate or higher, percent of persons age 25 years+, 2010-2014	85.00	81.98
Bachelor's degree or higher, percent of persons age 25 years+, 2010-2014	25.30	19.80
With a disability, under age 65 years, percent, 2010-2014	10.20	12.12
Persons without health insurance, under age 65 years, percent	16.00	19.27
In civilian labor force, total, percent of population age 16 years+, 2010-2014	60.30	57.10
Median household income (in 2014 dollars), 2010-2014	45,033.00	39,762.48
Per capita income in past 12 months (in 2014 dollars), 2010-2014	24,222.00	21,404.04
Persons in poverty, percent	18.00	21.67

Note: Cells highlighted in blue indicate an important difference between the statewide data and the subset area impacted by the floods and covered by the state allocation (SGAOR area does not include Lexington and Richland Counties).

Impact on Low-and-Moderate-Income Populations

All programs supported by HUD Community Development Block Grant Disaster Recovery (CDBG-DR) assistance must demonstrate benefit to individuals and communities by meeting one of the program's three National Objectives for all money spent on projects. These are: (1) benefiting low-and moderate-income (LMI) persons, (2) aiding in the prevention or elimination of slums or blight, or (3) meeting a need having particular urgency (urgent need)[6].

Low- to moderate- income households are defined as households that do not exceed 80% of the median income for their area, as determined by HUD. These income categories are grouped into the following classifications:[7]

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

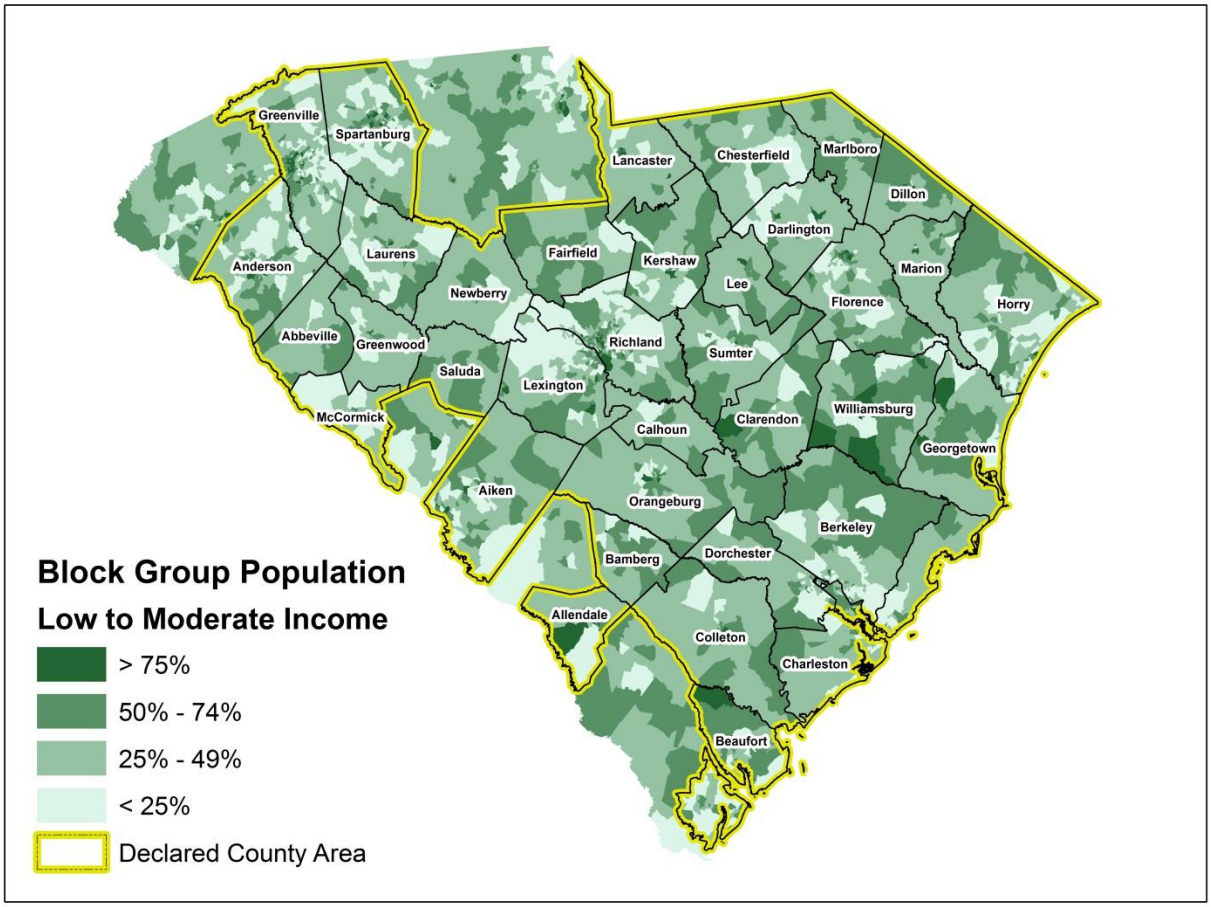
For the purpose of CDBG-Disaster Recovery programs, the SCDRO will apply the below terminology consistent with the HUD FY16 Income Limit Tables, while acknowledging the alternate language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system.

Household Area Median Income	HUD FY16 Income Limit Tables	Housing and Community Development Act of 1974	Reporting Designation in DRGR
0%-30%	Extremely Low Income	-	Low Income
31%-50%	Very Low Income	Low Income	Low Income
51%-80%	Low Income	Moderate Income	Moderate Income
81% or Higher	-	-	Urgent Need

[6] These National Objective definitions and corresponding language are set by HUD regulation.

[7] The term "Low-and-Moderate Income" is defined in the Housing and Community Development Act of 1974 as: The terms "persons of low and moderate income" and "low- and moderate-income persons" mean families and individuals whose incomes do not exceed 80 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of low income" means families and individuals whose incomes do not exceed 50 percent of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. The term "persons of moderate income" means families and individuals whose incomes exceed 50 percent, but do not exceed 80 percent, of the median income of the area involved, as determined by the Secretary with adjustments for smaller and larger families. **However, HUD Program Income Limits are published annually for use across all HUD funded program and contain incongruous terminology to the Housing Act.** Terminology published in the annual income limits is applied to other HUD funded formula allocation programs, such as the Section 8 program, to support individual income group targets within the LMI category: https://www.huduser.gov/portal/datasets/il.html For purposes of this CDBG-DR program, SCDRO has chosen to utilize the terminology consistent with the FY16 Income Limit tables.

Please refer to *Appendix: HUD Income Limits* for income categories in the declared counties.



Many of the counties in the impacted area have relatively high rates of low-and-moderate income populations. Overall, the average LMI rate for counties across the state-impacted area was approximately 43%, with some counties such as Fairfield (54.3%), Williamsburg (54.2%), and Lee (50.5%) reaching LMI levels over fifty percent county-wide. When block group populations are examined, additional LMI concentrations within each county become apparent, as illustrated in the map above.

Impact on Special Needs Populations

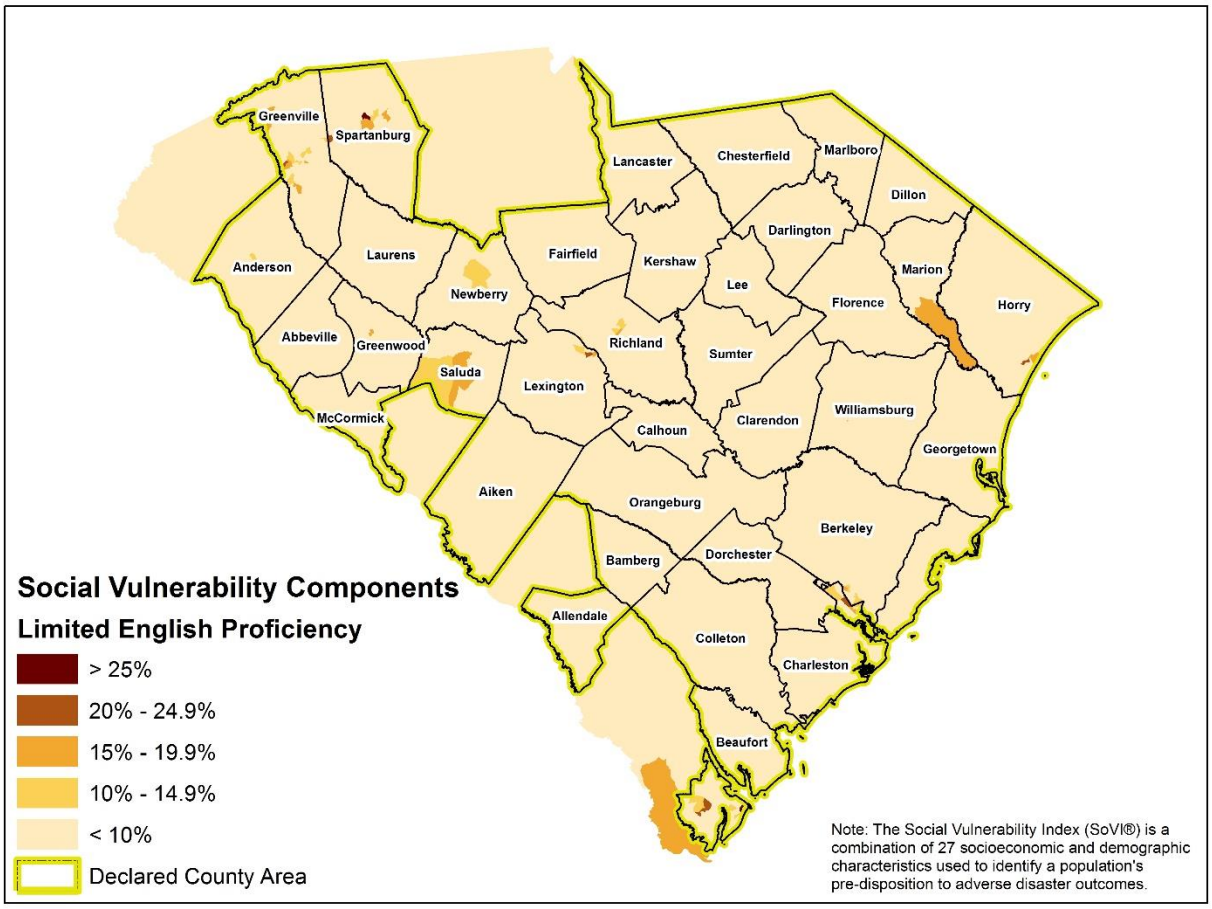
Individuals with access and functional needs will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, from diverse cultures, transportation disadvantaged, homeless, have chronic medical disorders, and/or a pharmacological dependency. In addition, they could have disabilities, live in institutions, have limited English proficiency or be altogether non-English speaking.[8]

[8] US Dept. of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response. "Public Health Emergency" – http://www.phe.gov/Preparedness/planning/abc/Pages/atrisk.aspx

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

According to U.S. Census data, approximately 4.5% of the population in the impacted counties speaks Spanish, with Greenville (8%), Newberry (7%) and Greenwood (5%) counties having the highest relative percent of the population as Spanish-speakers.[9] Outreach for the Action Plan and for applicant intake will take careful consideration of the language needs of these populations (see the sections on Outreach and Citizen Participation for more information).

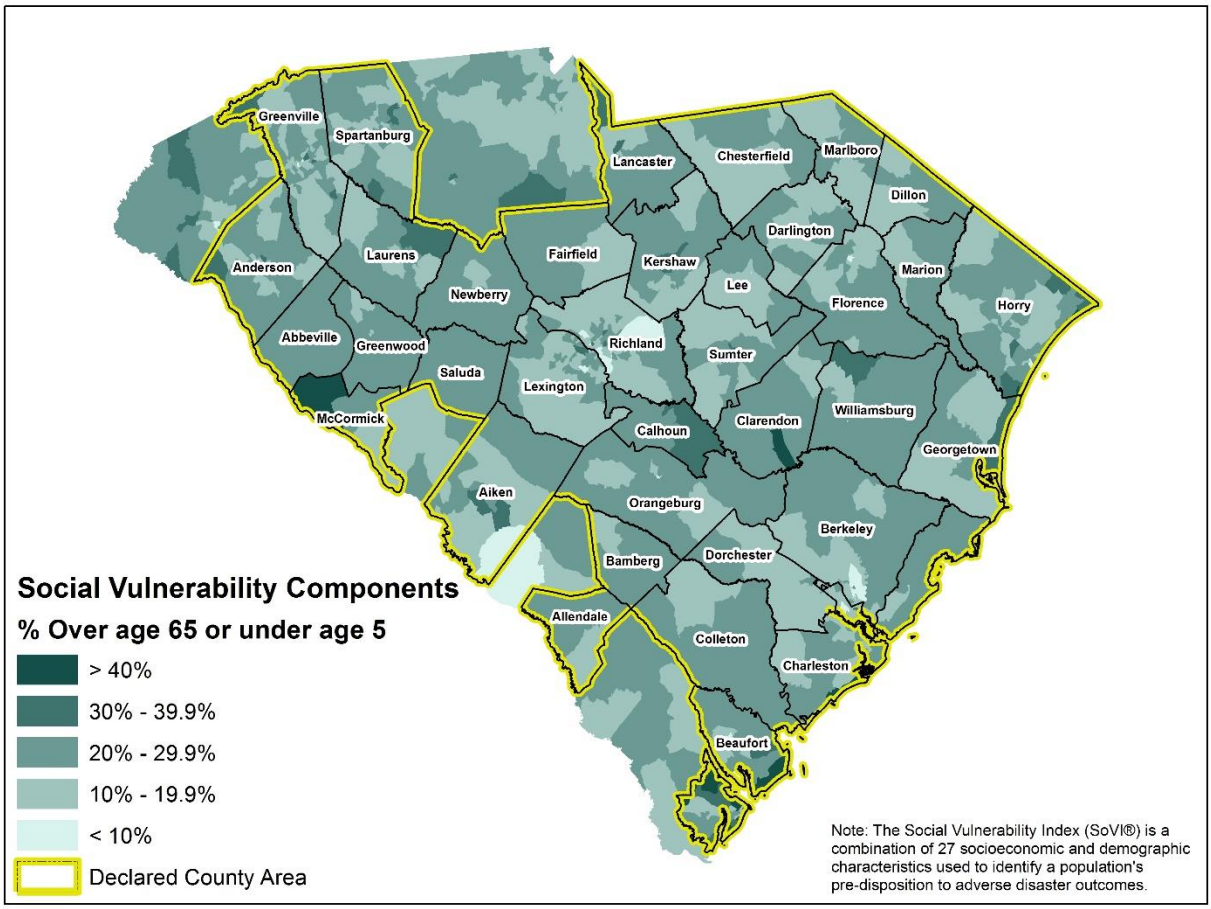
The map below shows concentrations of limited English speaking populations by census tract, followed by a table that shows the number of residents who speak only English or who speak Spanish or other languages, by county.



[9] Source: U.S. Census Bureau, 2006-2010 American Community Survey 5-Year Estimates, Table 16001. County-level percent calculations by the South Carolina Department of Revenue and Fiscal Affairs - Health and Demographics Section.

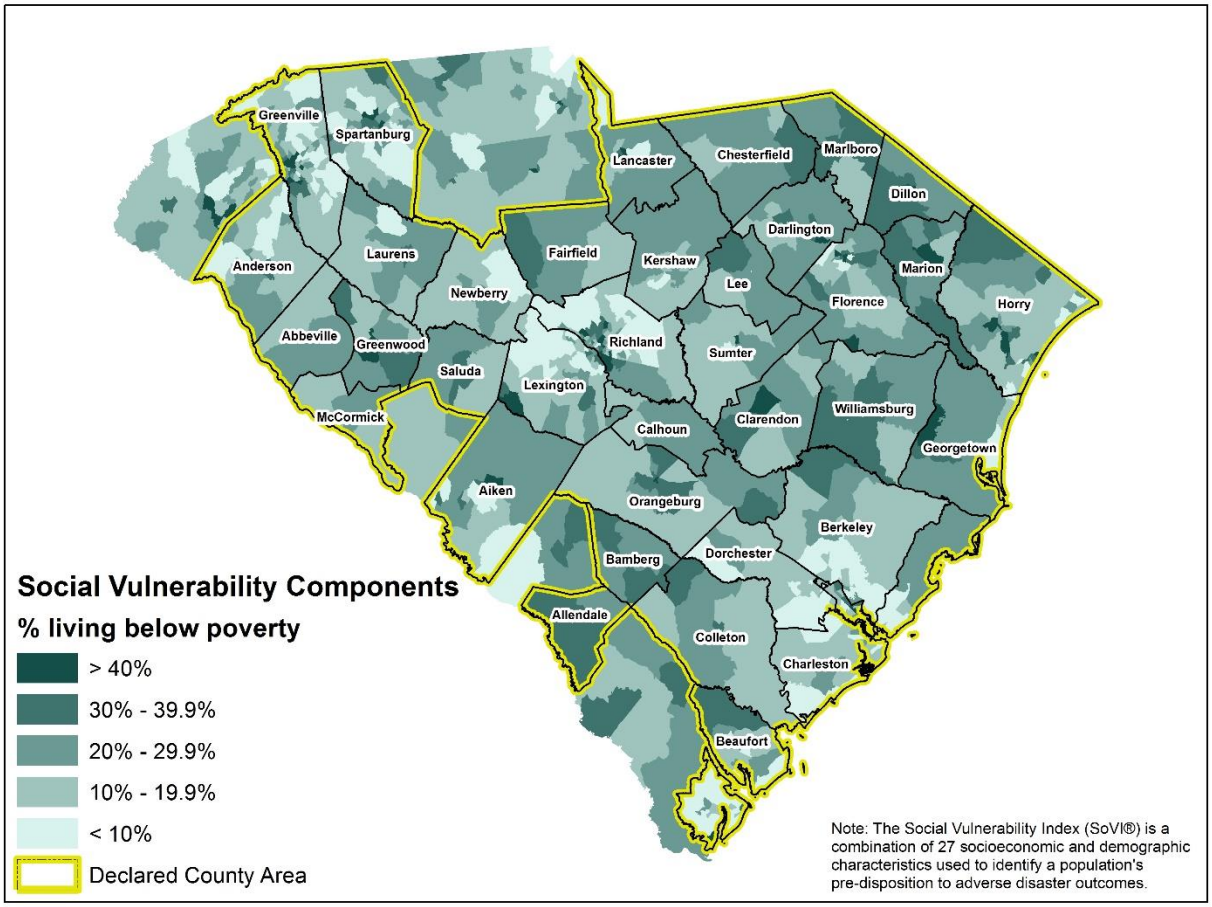
County	Total	English		Spanish		Other	
		Sum of English	% English	Sum of Spanish	% Spanish	Sum of Other	% Other
Abbeville	23,660	23,057	97%	131	1%	471	2%
Aiken	153,240	144,562	94%	6,046	4%	2,631	2%
Allendale	9,465	9,178	97%	256	3%	30	0%
Anderson	178,161	171,588	96%	4,073	2%	2,499	1%
Bamberg	14,799	14,531	98%	162	1%	105	1%
Beaufort	157,966	137,386	87%	15,859	10%	4,720	3%
Berkeley	175,432	161,915	92%	8,196	5%	5,320	3%
Calhoun	14,206	13,742	97%	412	3%	51	0%
Charleston	342,522	318,349	93%	15,047	4%	9,125	3%
Chesterfield	43,550	42,128	97%	1,292	3%	129	0%
Clarendon	32,599	31,549	97%	884	3%	165	1%
Colleton	35,868	34,615	97%	965	3%	287	1%
Darlington	64,036	62,288	97%	1,138	2%	609	1%
Dillon	29,273	28,289	97%	600	2%	383	1%
Dorchester	133,118	124,449	93%	4,832	4%	3,836	3%
Fairfield	22,135	21,418	97%	399	2%	317	1%
Florence	128,955	124,175	96%	2,805	2%	1,974	2%
Georgetown	57,287	55,329	97%	1,448	3%	509	1%
Greenville	436,056	387,722	89%	32,794	8%	15,539	4%
Greenwood	65,078	60,672	93%	3,379	5%	1,026	2%
Horry	267,806	246,484	92%	13,451	5%	7,870	3%
Kershaw	58,451	56,032	96%	1,668	3%	750	1%
Lancaster	74,596	70,530	95%	2,964	4%	1,101	1%
Laurens	62,261	59,387	95%	2,437	4%	436	1%
Lee	17,678	17,151	97%	461	3%	65	0%
Lexington	253,070	234,817	93%	12,027	5%	6,225	2%
Marion	30,288	29,333	97%	668	2%	286	1%
Marlboro	26,725	25,860	97%	715	3%	149	1%
McCormick	66,716	64,544	97%	1,655	2%	516	1%
Newberry	35,286	32,517	92%	2,362	7%	406	1%
Orangeburg	85,413	82,561	97%	1,616	2%	1,235	1%
Richland	369,609	339,952	92%	14,570	4%	15,086	4%
Saluda	18,621	16,151	87%	2,437	13%	32	0%
Spartanburg	269,984	243,907	90%	14,910	6%	11,166	4%
Sumter	100,075	94,779	95%	3,094	3%	2,201	2%
Williamsburg	31,676	30,902	98%	581	2%	192	1%
Totals	**3,885,660**	**3,611,849**	**92.95%**	**176,334**	**4.54%**	**97,442**	**2.51%**

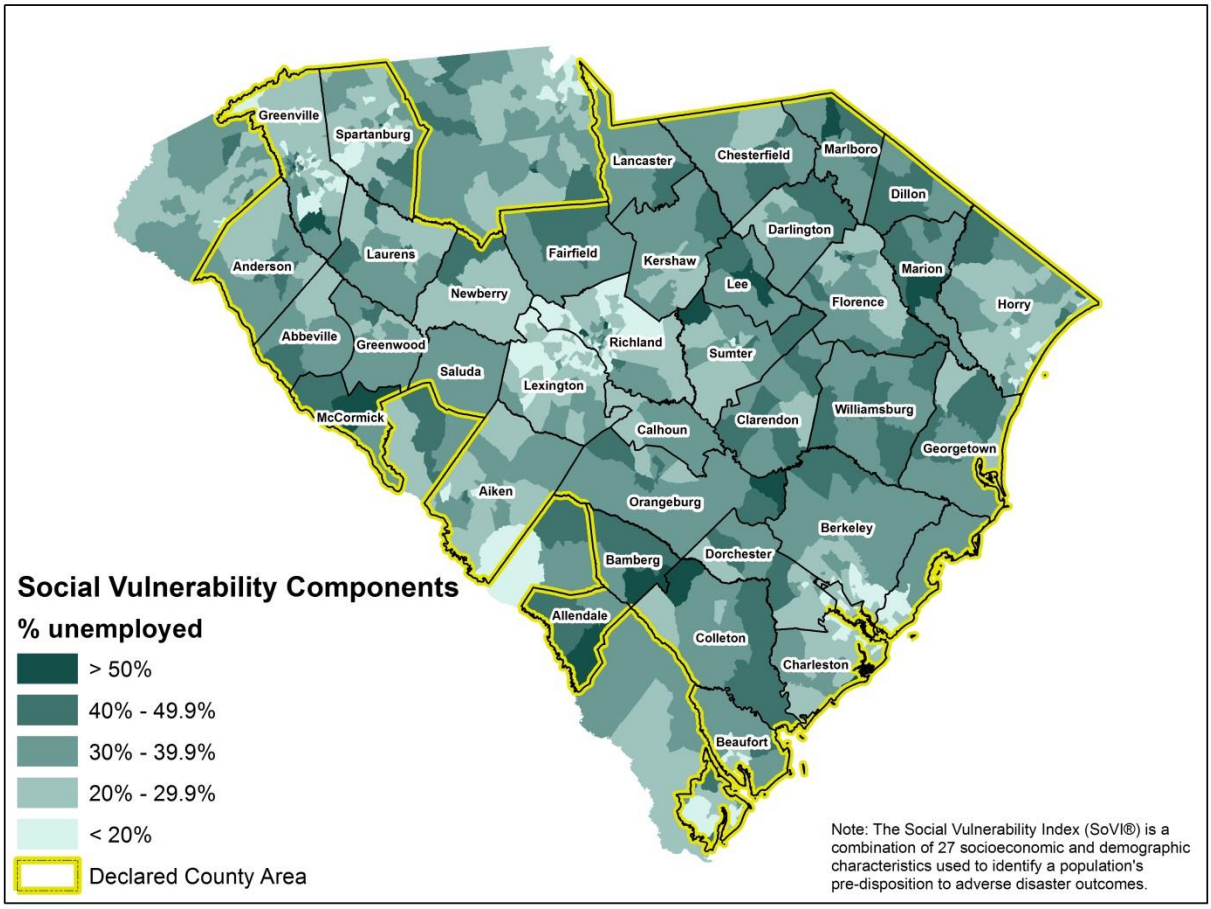
Being over the age of 65 or having children under the age of 5 contributes to the potential vulnerability of a household.[10] The map below shows concentrations of households with age dependent populations, by census tract. Concentrations are noticeable in Williamsburg, Clarendon, Calhoun, Georgetown, and Horry counties.



[10] As defined by SoVI.

Additionally, the Social Vulnerability Index (SoVI®) considers the percentage of the population living below poverty level. The map below shows relative concentrations of poverty in the northeast half of the state, followed by a map of larger concentrations of unemployment across the region.




Greenville
Spartanburg
Lancaster
Chesterfield
Marlboro
Dillon
Darlington
Anderson
Laurens
Fairfield
Kershaw
Marion
Lee
Newberry
Florence
Horry
Abbeville
Greenwood
Richland
Sumter
Saluda
Lexington
McCormick
Calhoun
Clarendon
Williamsburg
Georgetown
Aiken
Orangeburg
Berkeley
Bamberg
Dorchester
Allendale
Colleton
Charleston
Beaufort
Social Vulnerability Components
% unemployed
> 50%
40% - 49.9%
30% - 39.9%
20% - 29.9%
< 20%
Declared County Area
Note: The Social Vulnerability Index (SoVI®) is a combination of 27 socioeconomic and demographic characteristics used to identify a population's pre-disposition to adverse disaster outcomes.

Transitional Housing/Homelessness

Disasters such as the South Carolina flooding impact community members across all walks of life. While some may lose homes, others affected may be without homes both prior and following an event of such magnitude. In fact, homeless persons may be faced with even more adversity as others become displaced and shelters become more overcrowded. According to a 2015 Point-In-Time report from the South Carolina Coalition for the Homeless (and federally mandated by HUD), on any given night of January 2015 there were 5,354 homeless people in the State of South Carolina. Of these, approximately 35% are considered to be unsheltered.[11]

The report referenced was funded by the Emergency Services Grant: a HUD program that aims to help homeless families and persons by improving the amount and quality of emergency shelters available, re-housing the homeless, and preventing more individuals and families from encountering homelessness. **Regarding the population served by the State Housing Opportunities for Persons with HIV/AIDS (HOPWA) program, program managers confirmed that no Project Sponsor sites were impacted by the floods and impacted clients continued to receive services through normal operations.**[12]

Emergency Shelters

As the historic flooding continued to wreak havoc and remove many people from their homes, state and local authorities, along with various churches, charitable groups, and schools, stepped up quickly to help their fellow South Carolinians. Shelters opened up across the state to provide those in need with a place to stay and to receive necessities and nourishment. In total, 85 emergency shelters opened across 23 counties statewide in response to the disaster (69 over 21 counties in IA and PA Declared Counties).

The first emergency shelter was opened on October 1st of 2015 in preparation for potential storm impact. Numerous shelters continued to open statewide as the need for safe haven increased. The last emergency shelter to have occupancy was Trinity Baptist Church in Lexington County, which closed on November 13, 2015. The State demonstrated sufficient capacity in sheltering.[13]

[11] (http://www.schomeless.org/wp-content/uploads/2015/12/Final-DRAFT-PIT-Report-2015-statewide.pdf)
[12] Confirmed with South Carolina Department of Health and Environmental Control, HOPWA program on 4/18/16
[13] Data provided by South Carolina Department of Social Services, Disaster Response on 4/15/16

IA & PA Counties With Reported Shelters (Note: Lexington & Richland note included)	***Number of Shelters***
Abbeville	0
Aiken	1
Allendale	0
Anderson	3
Bamberg	0
Berkeley	4
Calhoun	0
Charleston	6
Chesterfield	2
Clarendon	5
Colleton	5
Darlington	0
Dillon	0
Dorchester	2
Fairfield	1
Florence	8
Georgetown	5
Greenville	1
Greenwood	2
Horry	6
Kershaw	2
Lancaster	0
Laurens	2
Lee	0
Marion	0
Marlboro	0
McCormick	0
Newberry	1
Orangeburg	2
Saluda	0
Spartanburg	1
Sumter	3
Williamsburg	7
Total Emergency Shelters	**69**

Enhanced Focus on Vulnerable Populations

South Carolina has taken a cutting-edge approach to its disaster recovery process by assessing social vulnerability as part of its recovery strategy. The Social Vulnerability Index (SoVI®) 2010-14 measures the social vulnerability of U.S. counties to environmental hazards. The index is a comparative metric that facilitates the examination of the differences in social vulnerability among counties. It graphically illustrates the variation in social vulnerability across the state. It shows where there is uneven capacity for preparedness and response and where resources might be used most effectively to reduce the pre-existing vulnerability. SoVI® also is useful as an indicator in determining the differential recovery from disasters.

The SoVI® index synthesizes socioeconomic variables, which the research literature suggests contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. An outline of the variables is shown below:

South Carolina Tract-Level 2010-14 Social Vulnerability Component Summary

Component	*Cardinality*	*Name*	*% Variance Explained*	*Dominant Variables*	*Component Loading*
1	**+**	Poverty and Race (Black)	18.053	% living in poverty	0.799
				% without access to automobile	0.793
				% Black population	0.719
				% Female headed households	0.670
				% employed in service sector	0.623
				% Renters	0.600
				% < 12th grade education	0.536
				% children living in two parent family	-0.799
2	**-**	Wealth	15.251	Median house value	0.863
				PerCapita income	0.806
				% earning more than 200K annually	0.797
				Median rent	0.676
				% mobile home population	-0.607
				% < 12th grade education	-0.624
3	**+**	Age (Old)	12.720	% Social security beneficiaries	0.872
				% Age dependent population	0.810
				Median Age	0.798
				% unoccupied housing units	0.609
4	**+**	Ethnicity (Hispanic)	7.938	% Speaking English not well	0.936
				% Hispanic population	0.929
5	**+**	Gender (Female)	6.7322	% Females	0.770
				% Female labor force	0.706
6	**+**	People Per Unit and Mobile Homes	6.104	People per unit	0.679
				% Nursing home residents	-0.669
		Cumulative Variance Explained	**66.798**		

27 Total Variables, populations < 1 excluded, housing units < 1 excluded

Notes: Component scores and composite SoVI® scores in the accompanying shapefile are relative and comparable across the state of South Carolina. The cardinalities of components in the accompanying shapefile have been adjusted as indicated above. The SoVI® composite score is obtained by summing all component scores. Input data are derived from the Five-Year American Community Survey, 2010-14.

The SoVI® Index has high utility as a decision-support tool for emergency management. The SoVI® metric turns historical disaster impact measures into actionable information for emergency managers, recovery planners, and decision makers as a whole. It empirically measures and visually depicts a population's (in)ability to adequately prepare for, respond to, and rebound from disaster events. Operationally, SoVI® is now part of FEMA's Geospatial Framework, the set of spatial products delivered automatically by FEMA upon Presidential Disaster Declaration.

The October 2015 flooding in South Carolina was the first implementation of the SoVI® methodology in a post-event recovery context. SoVI® was utilized by the state disaster recovery office to identify target areas across the states that would require outside assistance to rebound from this disaster. Here, SoVI® was coupled with FEMA, National Flood Insurance Program (NFIP), and SBA support to rapidly highlight areas with greatest need for additional recovery resources and more importantly to determine unmet needs. SoVI® provided an "apolitical" approach for distributing scarce disaster recovery dollars and rebuilding resources for the most benefit to the places that were worst impacted and least able to bounce back on their own from this disaster. SoVI® also provided an academic tool to graphically illustrate and assist Volunteer Organizations Active in Disaster (VOADs) in prioritizing their recovery efforts. In other words, South Carolina has already used data-driven assessment tools to guide actionable, expedited impact to the most vulnerable populations.

Civic Engagement

In the aftermath of the devastating flooding in early October of 2015, the citizens of South Carolina pulled together to embark on the recovery process. Instead of waiting for government assistance, volunteers led the charge to assist individuals and communities with recovery efforts. Federally recognized Volunteer Organizations Active in Disaster (VOADs) arrived on the scene just one week after the floods to set up work camp for over 900 first-response volunteers. Even today, the South Carolina VOAD community continues to coordinate relief efforts across 13 organizations, multiple state agencies and federal government officials as available.

To assist these organizations, the One SC Fund was established by the Central Carolina Community Foundation and endorsed by Governor Nikki Haley. The Central Carolina Community Foundation began the fund with an initial amount of $50,000 and has continued to raise funds from various donors from across the State of South Carolina and the country. This fund aims to help fill the gaps that the government has not yet addressed. The Foundation supports various federally recognized VOAD non-profit organizations providing relief and recovery to impacted areas, and gives individuals the opportunity to support those in need through private donations.

Non-profit organizations assisting in the relief and recovery efforts may apply for grants to help fund their recovery efforts. On December 21, 2015, just two months after the flooding, the first round of grants, worth $500,000, was distributed to the following non-profit organizations for service across the state, including service provided to Richland and Lexington counties as illustrated below:

- All Hands Volunteers (Georgetown County)
- Black River United Way (Georgetown County)
- Central South Carolina Habitat for Humanity (Richland County)
- Habitat for Humanity Georgetown (Georgetown County)
- Hearts and Hands Disaster Recovery (Darlington and Florence Counties)
- Home Works of America (Richland County)
- IMPACT Ministries of Myrtle Beach (Horry County)
- Mennonite Disaster Service (Georgetown and Williamsburg Counties)
- South Carolina United Methodist Church (Berkeley, Charleston, Colleton, and Sumter Counties)
- St. Bernard Project, Inc. (Richland County)
- Sumter United Ministries (Sumter County)
- United Church of Christ Disaster Ministries (Richland County)
- United Way of the Midlands (Richland and Lexington Counties)

These organizations, as well as countless individuals, have been dedicated to providing relief services to those affected. Projects range from mold remediation that will not only allow individuals to safely remain in their homes, but will also allow for the completion of home rehabilitation. It is estimated that the VOADs have assisted in the repair of approximately 450 homes to date.

Summary of Impact and Unmet Need

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

The preliminary estimated impact from the October flood and rain for South Carolina is $893,724,046 across the housing, economy, and infrastructure sectors combined. The figures provided in this assessment are based on best available data at this time and may be adjusted in the future as additional data becomes available. After taking into account the funds already made available through insurance, state and other federal assistance and other funds, the remaining overall unmet need is approximately $517,760,528 million. **The federal allocation of $96.8 million will allow the State to address less than one fifth of the overall unmet need.**

When examining the relative need by sector, housing represents the greatest need with $521,586,669 in unmet need, followed by the infrastructure sector with $15,087,560 in unmet need, followed by the economy sector (including agriculture) with a surplus in recovery funds due to Legislative action taken to

provide state funds for an agricultural recovery program. ***<u>This Action Plan focuses on Housing due to a Housing unmet need 34 times greater than the next type of unmet need, which was Infrastructure.</u>*** Each of these three sectors will be addressed in greater detail in the sections to follow. This $18,913,701 surplus offsets the overall Unmet Need amount.

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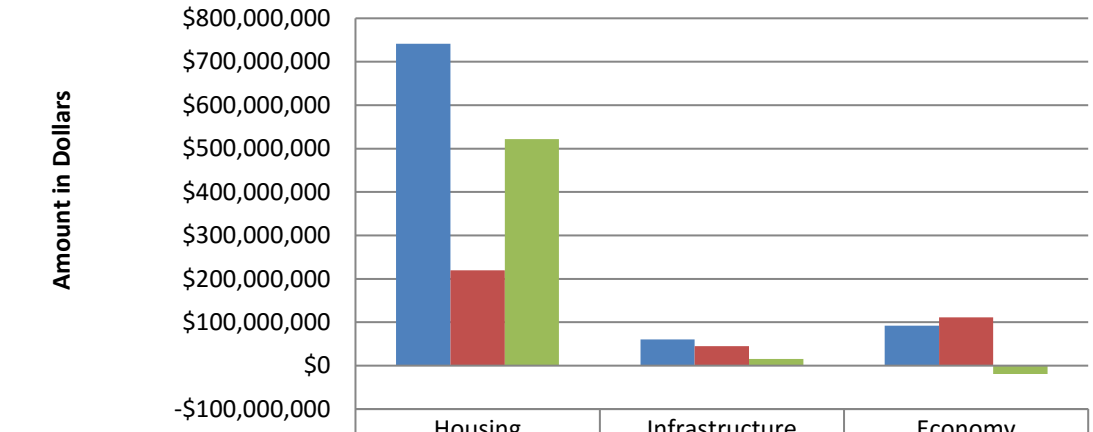
Unmet Need Summary Table



	Housing	Infrastructure	Economy
Amount of Estimated Impact	$741,079,990	$60,350,242	$92,293,814
Amount of Funds Available	$219,493,321	$45,262,682	$111,207,515
Unmet Need	$521,586,669	$15,087,560	-$18,913,701

Housing Impact

The housing impact caused by the flood and corresponding storm event was widespread. Single family homeowners in stick-built homes, single family homeowners in mobile homes, and renters in various housing types of housing stock were affected. The table below shows the FEMA Full Verified Loss (FVL) determinations for all IA counties.

FEMA IA Applicants with Full Verified Loss (Separate Allocation IA in gray)

County	# of Applicants	With FVL	% With FVL	FVL Dollars	Average FVL Dollars
Bamberg	510	339	66.47%	$182,383	$538
Berkeley	5635	3270	58.03%	$3,132,599	$958
Calhoun	874	546	62.47%	$373,068	$683
Charleston	9929	4776	48.10%	$5,772,600	$1,209
Clarendon	3964	2007	50.63%	$1,830,040	$912
Colleton	1892	1227	64.85%	$1,054,259	$859
Darlington	2848	1710	60.04%	$1,288,199	$753
Dorchester	4081	2099	51.43%	$3,817,931	$1,819
Fairfield	607	313	51.57%	$147,787	$472
Florence	6364	3206	50.38%	$4,278,586	$1,335
Georgetown	4318	2288	52.99%	$6,836,989	$2,988
Greenville	330	166	50.30%	$155,993	$940
Greenwood	472	267	56.57%	$493,459	$1,848
Horry	5797	2812	48.51%	$3,750,574	$1,334
Kershaw	1773	904	50.99%	$970,288	$1,073
Lee	1946	1079	55.45%	$902,395	$836
Lexington[14]	*5603*	*2530*	*45.15%*	*$5,373,201*	*$2,123.80*
Marion	1031	539	52.28%	$268,147	$497
Newberry	688	343	49.85%	$181,776	$530
Orangeburg	6391	3652	57.14%	$2,534,512	$694
*Richland**	*20447*	*8707*	*42.58%*	*$17,813,885*	*$2,045.93*
Spartanburg	344	179	52.03%	$169,680	$948
Sumter	9925	4812	48.48%	$9,123,551	$1,896
Williamsburg	5791	3349	57.83%	$5,735,290	$1,713
Totals:	101560	51120	50.33%	$76,187,193.03	$1,490.36

[14] Lexington and Richland Counties are not part of the State Government Area of Responsibility (SGAOR) for reasons described in this Action Plan.

Housing Types Affected

More than 100,000 applicants filed for FEMA Individual Assistance (IA) statewide as a result of the October storm event. Of those who specified housing unit type, more than 76% are home owners, including single family homes, duplex units, mobile homes and other housing types. The remaining 24% are renters, including renters of single family homes, mobile homes, apartment units and other housing types.

FEMA IA Applicants: ***Statewide***

Housing Unit Type	*Count of Applicants*
House/Duplex	56,438
Not Specified	435
Owner	47,211
Renter	8,792
Mobile Home	29,500
Not Specified	226
Owner	24,507
Renter	4,767
Other*	15,622
Not Specified	180
Owner	4,995
Renter	10,447
Grand Total	101,560

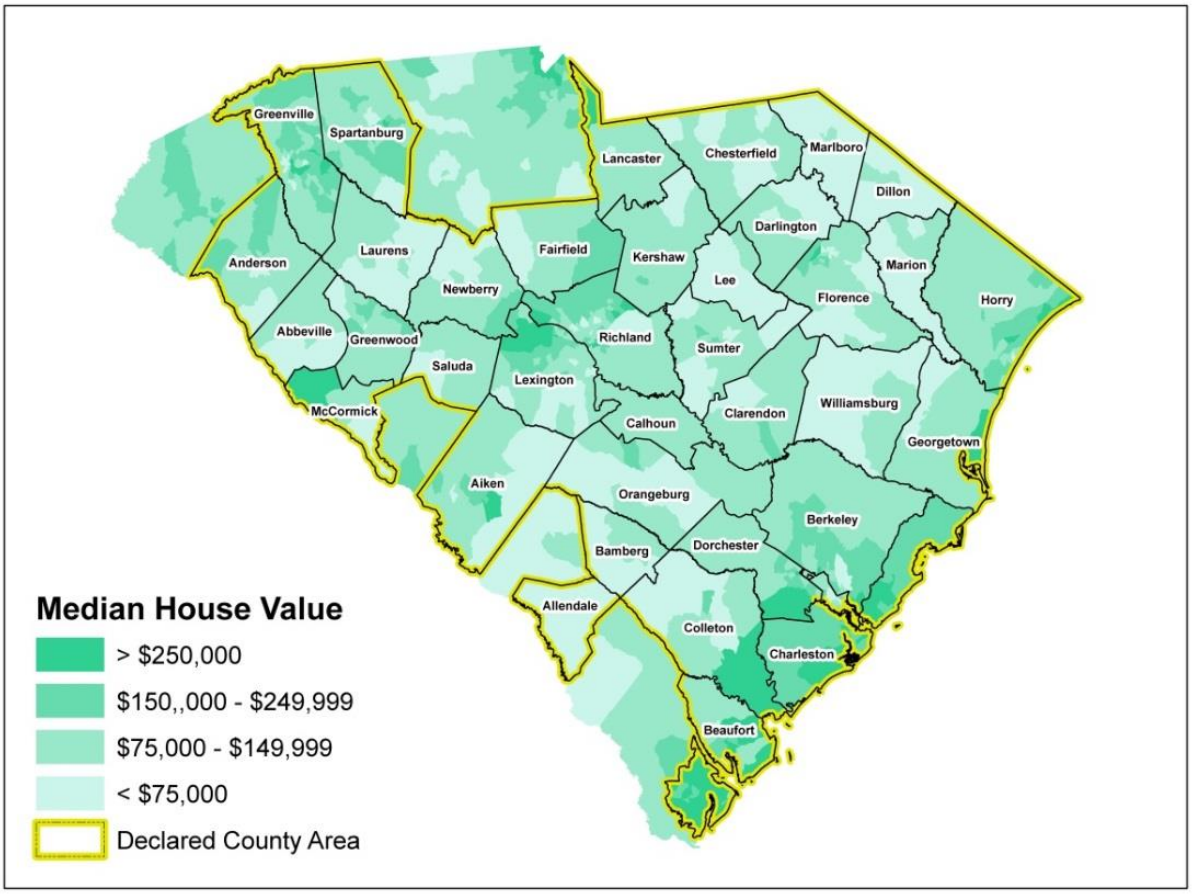
*Includes: Apartment, Assisted Living, Boat, College Dorm, Condo, Correctional Facility, Military Housing, Other, Townhouse Unknown, Travel Trailer
This table includes all IA counties, including Lexington and Richland.

*FEMA IA Applicants – **SGAOR** Area, by Housing and Ownership Type (subset of statewide)*

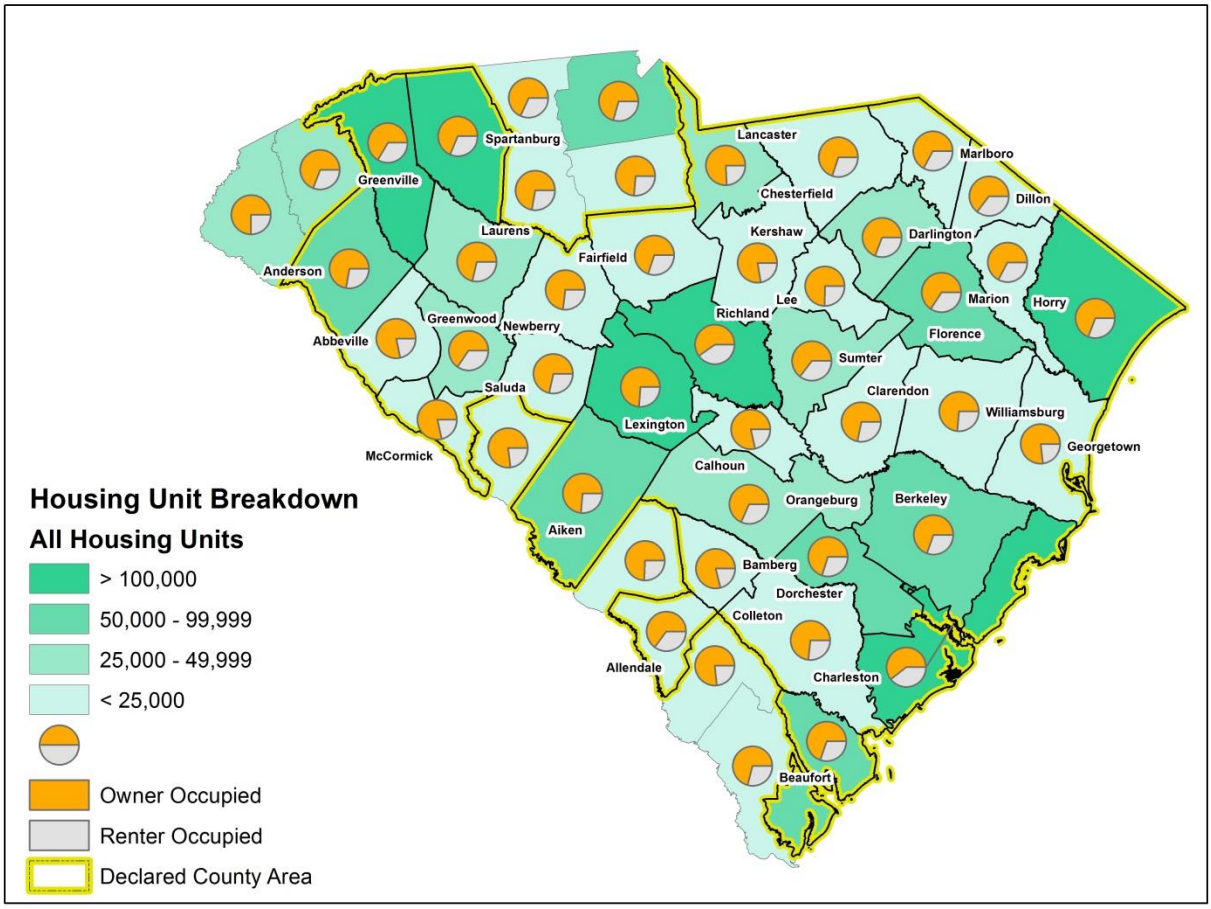
Row Labels	Not Specified	Owner	Renter	Grand Total
Apartment	18	14	2535	2567
Assisted Living Facility			22	22
Boat		9		9
College Dorm			2	2
Condo	4	239	110	353
Correctional Facility			1	1
House/Duplex	315	32495	5956	38766
Military Housing			11	11
Mobile Home	205	22586	4198	26989
Other	91	2999	3190	6280
Townhouse	2	88	98	188
Travel Trailer	3	260	58	321
Blank			1	1
Grand Total	**638**	**58690**	**16182**	**75510**

Single Family

Housing values range from over $250,000 to well below $75,000 in different regions of the state. Higher value homes are concentrated along the coast near Charleston and in the Lexington/ Richland area.



There are over 1.5 million housing units in the entire impacted area, many of which were built between 1980-1999, and most of which are owner-occupied units, as shown in the map below. With much of the housing stock in the 30-year range, key systems such as electrical, roofing, water heaters and furnaces may have already cycled through a replacement life-span in many homes.


Spartanburg
Lancaster
Marlboro
Greenville
Chesterfield
Dillon
Laurens
Kershaw
Darlington
Fairfield
Anderson
Lee
Marion
Horry
Richland
Greenwood
Newberry
Abbeville
Florence
Sumter
Saluda
Clarendon
Williamsburg
Lexington
Georgetown
McCormick
Calhoun
Orangeburg
Berkeley
Aiken
Bamberg
Dorchester
Colleton
Allendale
Charleston
Beaufort
Housing Unit Breakdown
All Housing Units
> 100,000
50,000 - 99,999
25,000 - 49,999
< 25,000
Owner Occupied
Renter Occupied
Declared County Area

Age of IA Housing Stock: Percentage of Units by Year Built, by County (ACS 2010-2014)

County	Total Housing Units	Percentage of Units by Year Built					
		2010 or Newer	2000-2009	1980-1999	1960-1979	1940-1959	Pre 1940
Bamberg	5777	0.4	11.9	33.5	33.2	14.4	6.6
Berkeley	67423	3.1	31.8	36.7	22.6	4.7	1.2
Calhoun	6135	1.6	13.5	41.5	26.6	10.7	6.2
Charleston	145991	1.7	22	31.3	26.8	11.8	6.3
Clarendon	12768	0.8	16.5	44.5	25.6	8.1	4.5
Colleton	14678	0.5	13.1	45.9	26.2	11.8	2.6
Darlington	26267	0.7	8.8	40	31.3	12	7.2
Dorchester	51450	2.2	34.8	35.1	22.3	3.6	2.1
Fairfield	9402	0	10.9	41.2	30.1	11	6.9
Florence	51794	1.1	14.9	38.1	30.2	11.4	4.4
Georgetown	23309	1.1	22.5	42.6	21	9.1	3.5
Greenville	176955	1.6	21.3	35	26.3	11.9	4
Greenwood	26760	0.5	12.9	33	28.6	16.1	8.9
Horry	115764	2.2	31.4	42.9	16.8	5	1.8
Kershaw	24061	1.8	21.9	39.3	21.4	11.5	4.1
Lee	6471	0.7	10.6	42.5	28.6	10.3	7.3
Lexington*[15]	105081	2.2	21.8	39.9	27.2	7.1	1.8
Marion	11782	1.4	7.4	39.3	33.6	12.3	5.9
Newberry	14230	1.1	13.2	34.1	24.1	14	13.4
Orangeburg	33836	0.4	11.2	42.4	28.5	12.4	5.1
Richland*	144647	2	22	30.2	27.9	13.2	4.6
Spartanburg	108383	1.5	20.5	33	26.8	11.7	6.5
Sumter	40024	1.5	16.2	40.5	27.2	10.4	4.1
Williamsburg	11788	1.1	9.5	41	30.9	12.4	5.2
Total Units	1234776						

[15] Lexington and Richland Counties are not part of the State Government Area of Responsibility (SGAOR) for reasons described in this Action Plan.

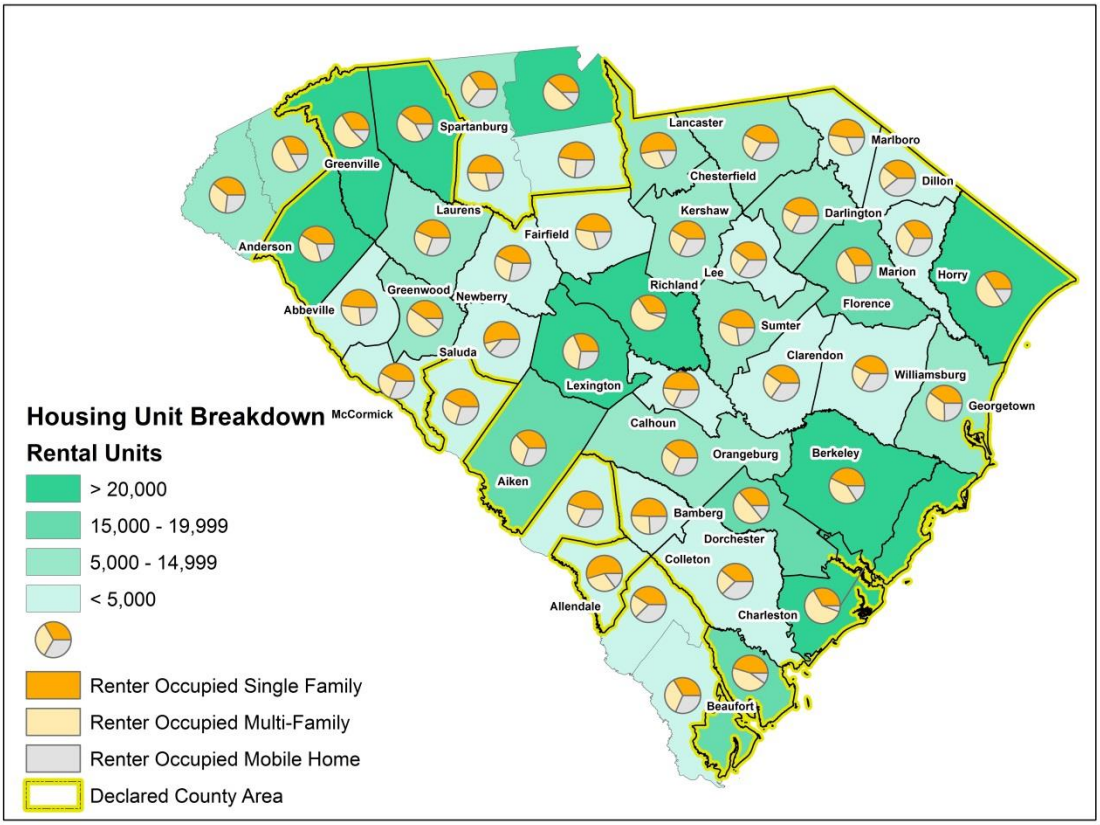
Rental Housing

Rental housing is an important component of affordable housing for impacted area. Much of the rental housing (approximately 84%) in South Carolina was built prior to 1999.[16] The older building code, and in some cases, the lack of regular maintenance adds to the vacancy rate and therefore the rental housing needs.

The rental vacancy rate for South Carolina in January 2015 was 9.6%, according to the Census. The median rent for the state is $873 monthly. According to the RSS report, subsequent to the floods, affordable rental housing vacancy rates are low and impacts to low-income or hard-to-house families are high in areas such as Williamsburg and Georgetown counties.

Of the FEMA applicants to the IA program for the state-assessed area, more than 16,201 live in rental housing; 14,328 of whom are also of low-and-moderate income.

As indicated by the map below, rental units in the non-urban counties are primarily single family and mobile home units, with the majority of renters in those unit types as opposed to multi-family complexes. This is due to the rural nature of the communities.



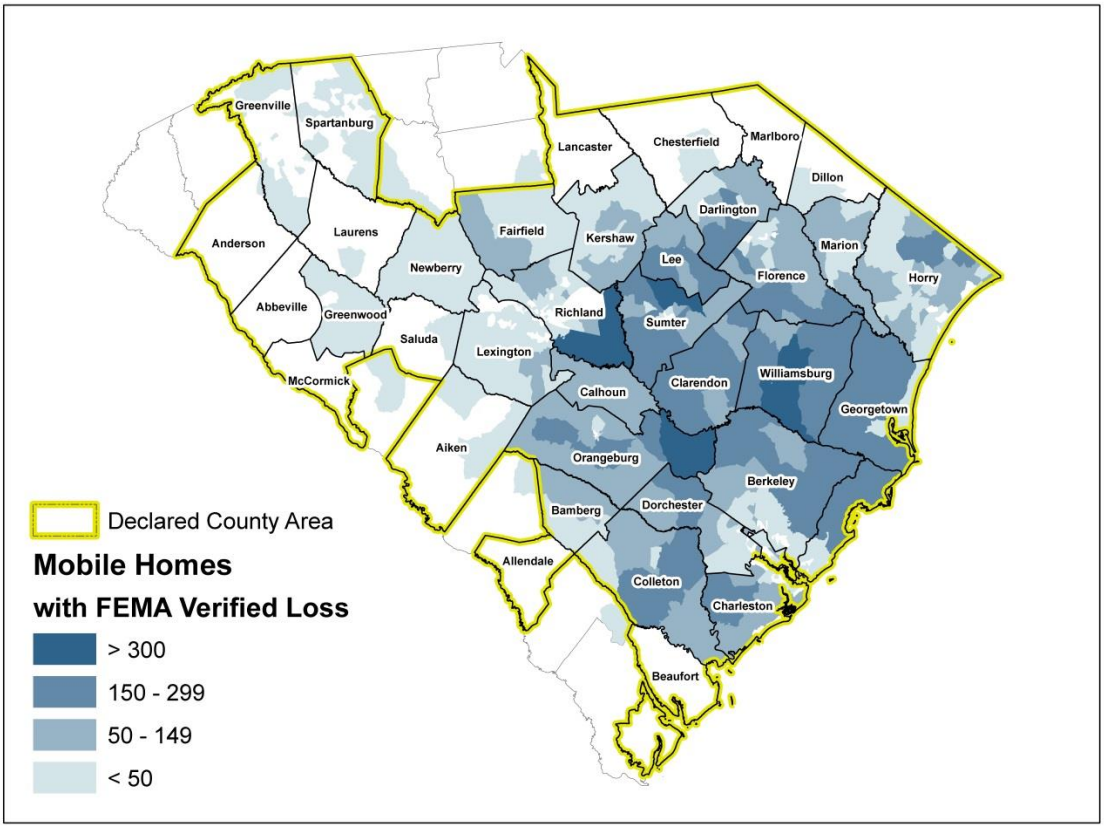
[16] SCI WAY – SC Housing Statistics Website

Mobile Homes

Mobile homes are part of the housing fabric of South Carolina. Their affordability and ease of general maintenance provides housing independence and housing choice to residents across the state. However, wind and flood damage to mobile homes is often difficult to repair, due to the integrated nature of the building components. In addition, when considering whether or not a structure is repairable, the cost of making those repairs may be disproportionately high when considering the overall value of the structure.

Often, the full extent of flood damage to mobile homes is not always realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home's structure or insulation can develop over time as well. Limited assistance funds portioned out through fragmented assistance programs can lead to piecemeal repairs that add up in cost, without adequately addressing restoration of the home's structural integrity to a decent, safe and sanitary standard.

Of the FEMA IA applicants in the state-assessed areas, approximately 27,011 of them reside in mobile home units.



Mobile home damage was also concentrated in certain areas, as illustrated in the map above. These areas include Sumter, Orangeburg, Williamsburg, Berkeley, and Florence as the top five impacted counties in terms of simple count of the number of homes with documented FEMA verified loss.

Additionally, there were 19,035 mobile homes with a FEMA Full Verified Loss amount in the IA declared area.

IA County	Mobile Homes with FVL
Bamberg	168
Berkeley	1554
Calhoun	253
Charleston	1207
Clarendon	1097
Colleton	702
Darlington	901
Dorchester	767
Fairfield	147
Florence	1314
Georgetown	1030
Greenville	27
Greenwood	54
Horry	1383
Kershaw	329
Lee	575
*Lexington**	*639*
Marion	288
Newberry	145
Orangeburg	1961
*Richland**[17]	*892*
Spartanburg	28
Sumter	1842
Williamsburg	1732
Grand Total	**19035**

[17] Lexington and Richland Counties are not part of the State Government Area of Responsibility (SGAOR) for reasons described in this Action Plan.

Summary Tables

When looking at the FEMA IA applicant population, many of the applicants either reside in high vulnerability areas, as defined by High SoVI® scores, or Medium-High SoVI® areas. Of these residents, there are subsets of populations age 65 or over, and additionally, who are over 65 and have access and functional needs (AFN). These applicants, and those who are low-income, often have the fewest means of assistance available to them.

The tables below provide breakouts of FEMA IA applicants into categories considering social vulnerability, ownership versus rental, age, access and functional needs, and income. Within the tables, the owners and renters noted as AFN are a subset of those listed as "Over 65," while those listed as "Over 65" are a subset of the High/Medium-High SoVI® applicants:

FEMA IA Applicants			
Home	High SoVI®	Over 65	AFN
Owners	4091	1439	32
Renters	1148	80	2
Mobile Home			
Owners	2699	419	8
Renters	676	24	1

FEMA IA Applicants			
Home	Medium-High SoVI®	Over 65	AFN
Owners	14995	5161	120
Renters	3281	229	9
Mobile Home			
Owners	12371	2146	57
Renters	2193	104	4

As opposed to the tables above, those below indicate FEMA IA Applicants with 50% or 80% LMI income levels, which are distinct factors from SoVI® category.

FEMA IA Applicants			
Home	< 50% LMI	Over 65	AFN
Owners	19009	6770	168
Renters	6336	395	11
Mobile Home			
Owners	14938	2820	64
Renters	3737	159	6

FEMA IA Applicants			
Home	< 80% LMI	Over 65	AFN
Owners	28569	9811	226
Renters	7801	467	16
Mobile Home			
Owners	20158	3624	87
Renters	4403	176	6

Public Housing

Public Housing is an integral piece of the State's housing resources for low-income persons. Statewide, there are approximately 15,154 public housing units and 26,673 Section 8 Vouchers. Approximately 10,317 Section 8 Vouchers are available in the impacted counties, excluding the areas covered by Lexington and Richland Counties. Moreover, of the Section 8 Housing Units in the state of South Carolina, 21% are located in Lexington and Richland combined. The level of public housing in those counties can be attributed to the fact that they lie within the urban capital hub of Columbia.

As per the *Mission Scoping Assessment* report released on February 5, 2016, the public housing stock as a whole received minimal damage and impacted populations were able to recover quickly with assistance. The assessment serves as the formal report out on data submitted by public housing authorities to the HUD state office.

> *"As of January 22, 2016, and since reporting began from the individual housing authorities in the affected counties on October 5, 2015, displaced families received assistance through the Public Housing Program and displaced families received assistance through the Housing Choice Voucher Program (HCVP) or Section 8. During this period, the highest number of displaced in Public Housing is 113 and in HCVP is 56. No major structural damage was recorded. However, some repair work was needed.*
>
> *New rental housing vouchers were issued to the renters in the damaged units and the public housing units have been rehabilitated. As of February 3, 2016, all Public Housing families have returned to permanent housing and 32 HCVP recipients have been issued new vouchers and are in the process of selecting permanent housing. HUD will continue to monitor the displaced families in HCVP until all have been restored to permanent housing. County housing authorities are responsible for any public housing remediation. These disaster re-housing efforts have not impacted overall housing vacancy rates across HUD affordable programs because HUD had to re-house families already receiving assistance"* (Mission Scoping Assessment).

The information in the assessment regarding no major structural damage and the rapid repair of any minimal damage to public housing units was validated by the state HUD field office.

SCDRO also consulted with the South Carolina State Housing Finance and Development Authority (SC Housing) regarding transitional housing and Section 8 housing issues in the impacted area.[18] SC Housing administers HUD's Housing Choice Voucher Program (HCVP) in seven South Carolina counties: Clarendon, Colleton, Dorchester, Fairfield, Kershaw, Lee and Lexington. SC Housing identified general over-subscription of the HCVP program as an ongoing challenge for the State. In other words, the shortage of available vouchers has remained at consistent, high levels, since before the flood. The agency also provides funding to organizations which provide supportive services and transitional housing. As the

[18] Communication with SC Housing on 6/22/16.

housing programs outlined in this Action Plan are implemented; SCDRO may coordinate with providers of supportive services as needed.

Fair Housing

South Carolina is aware and will ensure that it complies with fair housing requirements applicable to the CDBG Program. The state will take steps to affirmatively further fair housing. When gathering public input, planning, and implementing housing related activities, it will include participation by neighborhood organizations, community development organizations, social service organizations, community housing development organizations, and members of each distinct affected community or neighborhood which might fall into the assistance category of low- and moderate-income communities.

The State's Analysis of Impediments to Fair Housing, conducted in 2011, was conducted in conjunction with the 2011-2015 Consolidated Plan and will be updated to include any impacts realized from the disaster in accordance with the new Consolidated Plan being submitted this year. The State certifies that it will affirmatively further fair housing through conducting and implementing the AI and that it will maintain records reflecting the analysis and actions taken.

Any activities that will be administered by the State will be conducted in accordance with the State's Analysis of Impediments to Fair Housing. Where impacts to housing are identified, any work will be conducted in accordance with Fair Housing principles. It is anticipated that any planning activities conducted will be required to incorporate a review of Fair Housing practices and address any concerns related to such in the plan.

The State, including multiple stakeholders such as the SC Human Affairs Commission (HAC), the SC Department of Consumer Affairs (DCA), and the SC State Housing Finance Development Authority (SHFDA), has conducted Fair Housing Surveys on a regular and ongoing basis, and has also undertaken public awareness activities, such as fair housing fairs and roundtable discussions. The State's fair housing efforts related to HUD funding have been detailed each year in the State's Consolidated Annual Performance and Evaluation Report, as required by HUD.

The State's 2011-2015 Consolidated Plan notes that:

> *"The most important impediment [to fair housing] revolves around the lack of Federal and State resources for affordable housing initiatives.... Homeownership programs not only provide loans and grants to prospective buyers, but provide developers with tax credits and other means to reduce costs and make units more affordable. These programs, too, are under constant scrutiny and possible reduction. It should also be noted that the supply of affordable housing units will diminish as they deteriorate or transition out of the affordable housing program, if new units are not created."*

Addressing the housing needs of the impacted residents is a priority to ensure housing stock is maintained and housing quality is improved. This will in turn create the foundation for livable, resilient communities.

The State of South Carolina has created this Unmet Needs Assessment and Action Plan to address a general program design that targets assistance funding to citizens with the most recovery need as determined by geographic concentration of damage, financial impact, and social vulnerability indicators. These criteria cover a broad spectrum of characteristics, none of which will be considered in isolation. The State will remain highly agile throughout the planning and implementation process to ensure program design is consistent with need as identified through public engagement.

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

As a guide, South Carolina has referred to the National Association for the Advancement of Colored People's (NAACP) adaptation planning structure as described in the organization's paper on "Equity in Building Resilience in Adaptation Planning." Many of the vulnerability factors share a commonality with the factors utilized by the SoVI® index, and the two frameworks are complementary.

Incorporation of resilience factors leads to improved outcomes: NAACP "Equity in Building Resilience in Adaptation Planning" excerpt:

From NAACP "Equity in Building Resilience in Adaptation Planning"

PRE-EXISTING VULNERABILITIES/ ASSETS	PROCESS/OUTCOME INDICATORS
Demographics Housing Security Food Security Mobility Health Status/Systems/Services Environmental Hazards Emergency Services Businesses/Jobs Public/Private Utilities Social Services Governance/Policies Community Knowledge/ Attitudes /Culture	Strengthened infrastructure Increase in economic development/jobs Better food security Improved Housing Educational opportunities Health Care services Improved emergency management services More gender responsive emergency Management Adaptation specific planning/decision Making Democratic systems of government Improved health/wellness Positive impact to culture

Housing Funds Made Available

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

Of the twenty-two counties declared eligible to receive Individual Assistance funding through FEMA in the SGAOR area, there were 75,510 applicants.

Of these, 39,883 had a FEMA Full Verified Loss (FVL) assessment; however, this does not mean that the applicant actually received funding. Of the applicants with a FVL, 15,905 received housing assistance (HA). An estimated $53,000,107 in damage was assessed for the 39,883 applicants with an FVL. This has resulted in $53,223,756 in housing assistance to date (this number is higher than the FVL amount because it includes housing assistance that was given to applicants without a FEMA FVL).

SGAOR Area	FEMA IA Applicants	FVL Assessed	Average FVL
FEMA FVL	**39,883**	**$53,000,107**	**$1,329**

SGAOR Area	FEMA IA Applicants	Applicant Breakdown
Universe	**75,510**	**100.00%**
FEMA FVL	**39,883**	**52.81%**
Received HA	15,905	21.06%
Received No HA	23,978	31.75%
No FEMA FVL	**35,627**	**47.18%**
Received HA	2,161	2.86%
Received No HA	33,466	44.32%

FEMA Individual Assistance (IA)

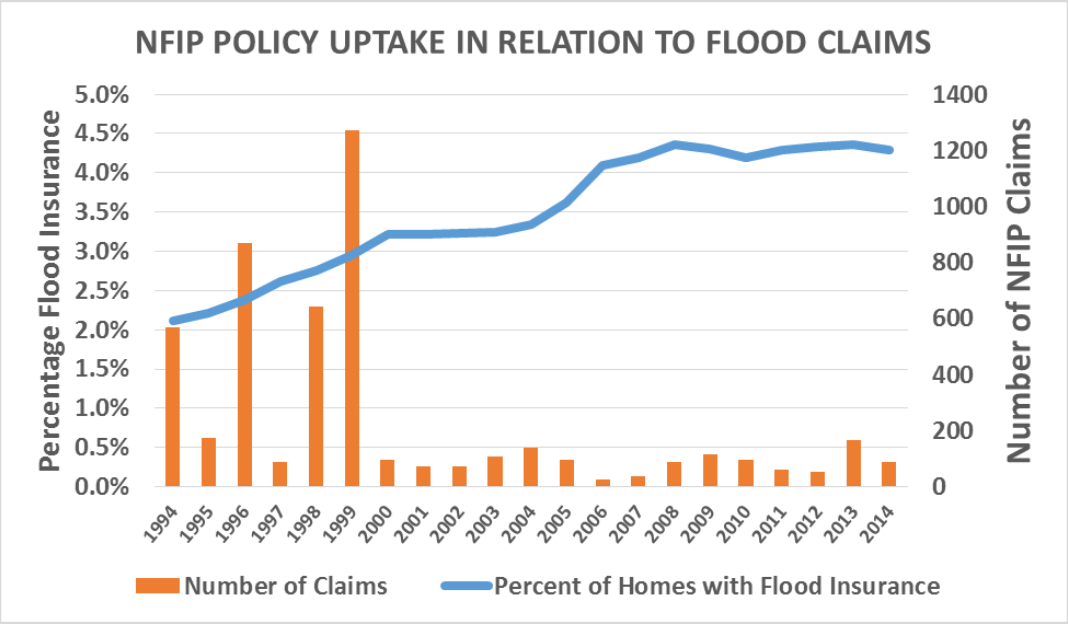
The FEMA Individual Assistance program consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds are for bridging the gap from sheltering to the return to permanent housing. These funds can be used for limited basic home repairs and replacement of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

National Flood Insurance Program (NFIP) Coverage

The rarity of a flood and rain event of this magnitude occurring in South Carolina was so unique that most of the state lacked any form of flood insurance. In fact, only approximately 4% percent of housing units in South Carolina are covered by NFIP policies. This may be due in part to properties being "heirship" (deeded down from parents or grandparents) or lien-free because the home no longer has a mortgage

associated with it. Without a bank note, an owner may not be aware of the home's location in the floodplain, or they may choose to forego flood insurance because it is not mandated.

The chart below indicates an increase in the number of claims prior to 1999, followed by relatively low usage over the past 15 years. The number of households with flood insurance has risen from 2% to over 4%.



Small Business Association (SBA) Home Loans

The SBA has made $76,317,900 in assistance available to 3,090 of homeowner applicants in the SGAOR region. The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this flood event where applicants were assessed by SBA and FEMA IA is $24,698.

Housing Trust Fund for the South Carolina Flood Initiative

In addition to the funding cited above, in the wake of the October flooding in South Carolina, the State acted to create the South Carolina Housing Trust Fund (HTF) Flood Initiative. This state-funded program aims to provide financial support to those most in need of funds to repair and preserve their homes as quickly as possible by utilizing nonprofit, private, and state funding. This initiative helps ensure that homeowners in need can complete necessary repairs and eliminate unhealthy living environments.

In order to ensure these funds are directed towards those in the most need, eligible parties must be low-income homeowners in declared counties that experienced damages due to the October flooding. Specifically, these homes in which damages will only worsen without immediate repair are eligible. There is currently a $1 million set-aside in HTF for the SC Flood Initiative. ***The State of South Carolina will, through its disaster case management contractor, and CDBG-DR implementation contractor, examine each applicant to determine their eligibility for other available assistance, which can be leveraged by sing CDBG-DR funds. Other available assistance, which will be determined on a case-by-case basis***

include assistance grants from the South Carolina Housing Finance Authority and USDA rural development program. This funding may be leveraged by the CDBG-DR program, and is currently designed to be accessed by eligible non-profits ***thus providing increased total assistance to a subrecipient while adhering to program funding limits.***

Housing Unmet Need

In South Carolina, approximately 57,507 FEMA IA applicants in the state-assessed area have not been deemed eligible to receive housing assistance to date. There are a variety of reasons why an applicant may be deemed ineligible for assistance. According to FEMA, a few of these reasons are:

- *"Sometimes a first ineligibility determination is simply a clerical error, such as a name is misspelled, an address doesn't match or a signature has been left out.*
- *If more than one person from the same home address registered, the applications will be flagged until the head of household can be determined.*
- *The applicant has insurance, and more information about the policy is needed. FEMA cannot duplicate benefits. However, once you receive insurance payment, FEMA may be able to assist with uninsured losses.*
- *Proof of occupancy is required. Whether a homeowner or renter, the damaged dwelling must be a primary residence where the applicant lived at the time of the disaster.*
- *Identity verification is needed. Sometimes an applicant simply needs to submit documentation—such as a passport or military issued ID—so a social security number can be verified. If an applicant was recently married, a marriage certificate or license may be required to verify any name change."*[19]

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

The insurance-defined differences between flood damage and water damage are technical in nature, and can be misunderstood by residents and damage inspectors alike. Damage from a flood occurs when water rises on land that is usually dry. However, water damage occurs when the water strikes the home prior to making contact with the ground. In many cases, a resident may not have the protection of flood insurance if they rent, live in a home with no mortgage, and/or live in a moderate-to-low -risk flood hazard

[19] http://www.fema.gov/news-release/2013/05/21/ineligible-fema-may-just-need-more-information

area.[20] Many homeowners as well as renters may not realize that flood damage is not covered by a standard homeowner/rental insurance policy. Damage inspectors, expecting to see flood damage, may overlook water damage caused by rain. These complications can result in hardship and frustration after a disaster if residents are unable to receive assistance to repair their damaged home.

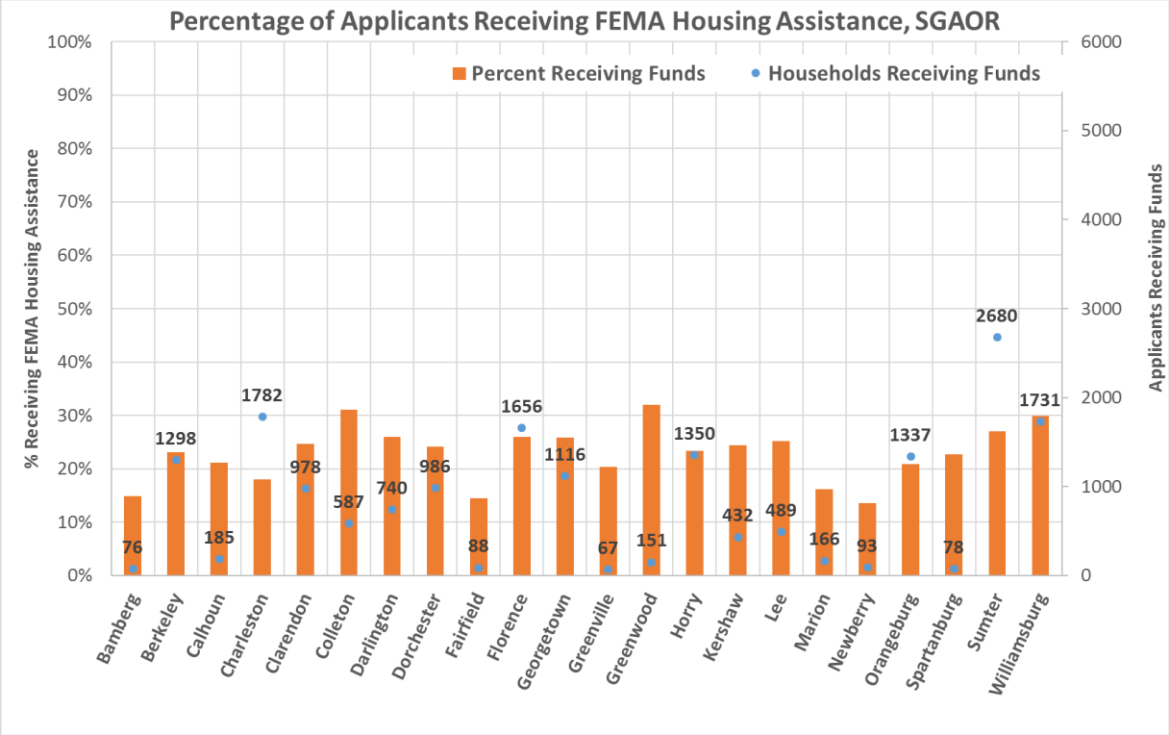
This issue has been brought to light in previous disasters. In Texas, fair housing advocates note:

> *"Following Hurricane Ike, FEMA denied at least 85% of the more than 578,000 applications for housing assistance. The most common denial code used by FEMA (in over 100,000 cases) was "insufficient damage." Many low-income applicants were told informally by FEMA that their "insufficient damage" denials were actually based on "deferred maintenance." FEMA alleged that the homes had been in poor condition before the storm and therefore damage could not be attributed to the hurricane. Because low-income households are more likely to have "deferred maintenance," these denials had a disproportionate impact on low-income households, particularly in minority neighborhoods. Non-profit groups in Houston reported that entire neighborhoods, generally low income and minority concentrated, of damaged homes were deemed to have "insufficient damage." FEMA similarly denied half of all applications for housing assistance following Hurricane Dolly. Based on a suit by Texas homeowners, a Federal District Court held that FEMA could not rely on this unpublished rule."*[21]

[20] Fast Home Help: http://www.fasthomehelp.com/blog/2013/03/26/flood-damage-versus-water-damage-123804

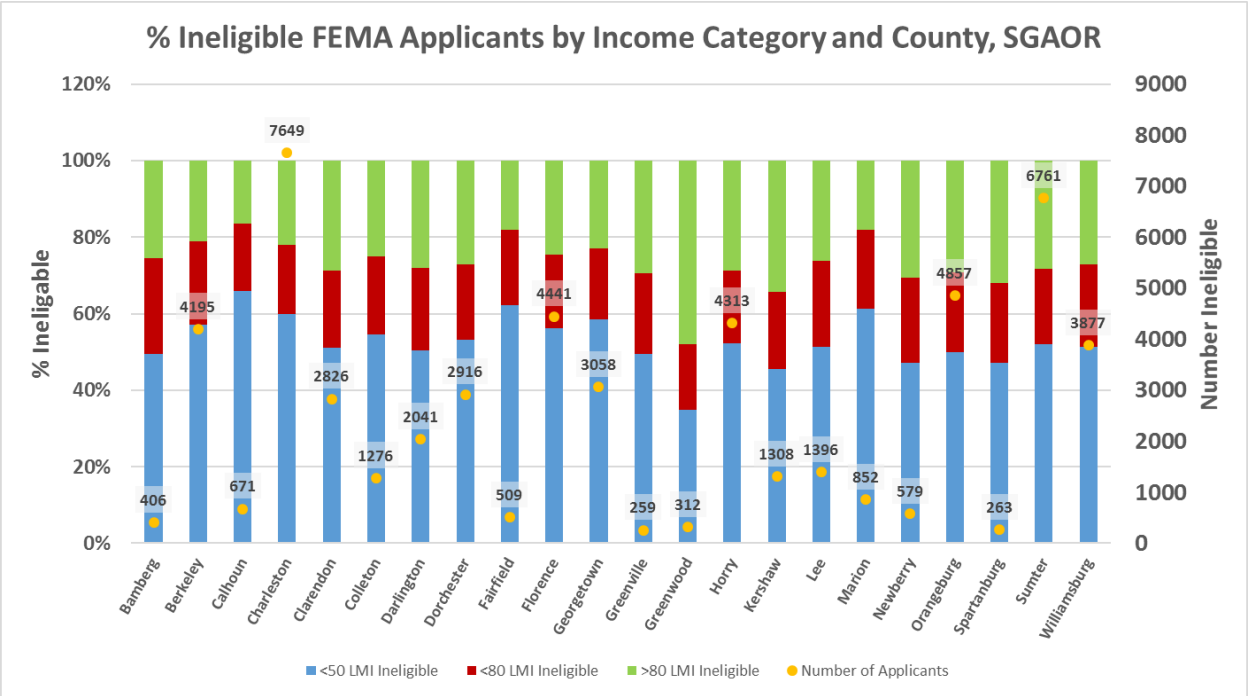
[21] Written Testimony of Texas Appleseed for the Texas Senate Committee on Intergovernmental Relations Wednesday, December 2, 2015. https://www.texasappleseed.org/sites/default/files/12-2-15%20Testimony%20of%20Texas%20Appleseed%20-%20IGR%20Charge%203_0.pdf

The chart below shows the percent of people who applied to FEMA IA who have received an award, by county, as well as the number of applicants receiving funds. On average, 24% of the FEMA IA applicants in the SGAOR counties received Individual Assistance.[22] This number will continue to fluctuate as applicants move through the review pipeline.



[22] FEMA IA Data

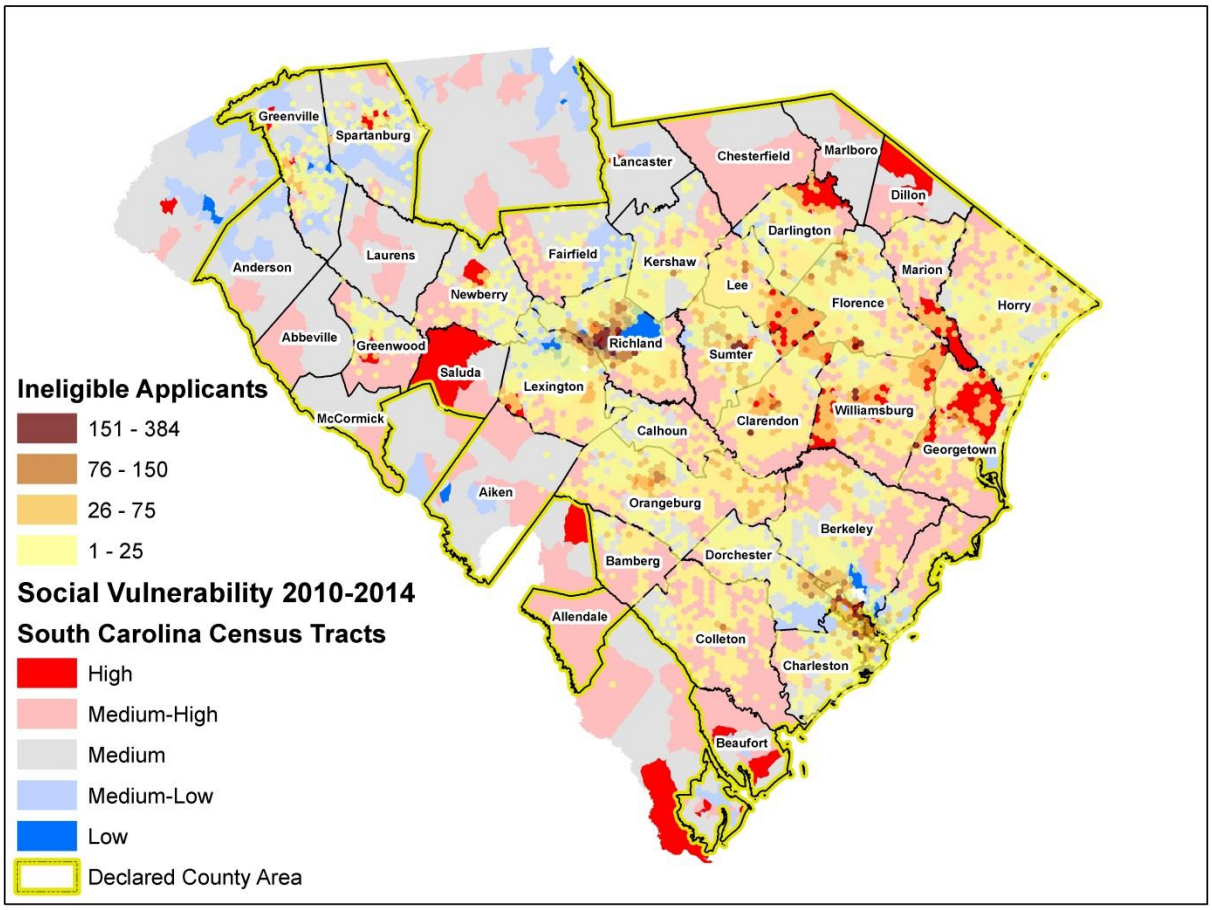
For this event in particular, however, the overwhelming majority of *ineligible* FEMA IA applicants are of low-to-moderate income, with many of those below 50% of the Area Median Income (AMI) as illustrated below.



In essence, this means that a population of vulnerable individuals may be in need of focused outreach and intake assistance to review their eligibility for the CDBG-DR program, especially in areas where FEMA IA assistance was applied for but not provided.

The map below shows that while FEMA IA ineligible applicants are disbursed across the state, there are concentrations of ineligible applicants in areas of high social vulnerability, such as in Sumter, Williamsburg, and Florence counties, with pockets in Charleston and Berkeley as well.

FEMA IA Ineligible Applicants in Relation to SoVI® Social Vulnerability Index



Housing Impact Methodology

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 funds already provided by FEMA.

Because accurate, complete data sources are often difficult to obtain after a major disaster event, HUD has stated that calculations may be used to in order to determine the average cost to fully repair a home. Generally, this is done by "using the average real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable."[23]

Previously approved impact assessment methodologies have utilized the average SBA repair estimates in comparison to average FEMA FVL amounts to establish a housing multiplier for repair, that would then be applied to the total amount of FEMA FVL to establish the full extent of housing impact. In South Carolina, when the average SGAOR FVL amount of $1,329 is compared to the average SBA amount of $24,698, the full extent of housing impact caused by the flood and rain would be over $900 million (before any deductions for funds already provided are calculated).

In an effort to more finely calibrate the impact amount, the housing impact for this needs assessment was calculated using the median SBA amount of $17,400 to account for outliers in the SBA data (a few very high and very low award amounts) that were impacting the average. When applied to the universe of FEMA applicants without an FVL[24], this results in an adjusted housing impact of $673,709,082. Ten percent in additional resiliency costs were applied, for a total impact of $ 741,079,990. After deducting the funds already provided by FEMA, SBA, estimated insurance proceeds, NFIP, One SC and the State HTF, the remaining unmet need for housing is approximately $521,586,669.

[23] Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013

[24] This method is a HUD approved model utilized in other states.

Infrastructure Impact

Infrastructure systems affected by the October 2015 storms and flooding event included damage to dams, roadways, bridges, wastewater treatment systems, drinking water treatment and collection systems as well as the State's beaches. The immediate recovery efforts were well-documented by the Recovery Support Strategy (RSS) and by the initial project worksheets being submitted for Public Assistance.

Dams

The October 2015 floods caused extensive damage to the State's dams. According to the Mission Scoping Assessment and RSS, as many as 243 dams were damaged. Of the 2,370 regulated dams in the state, 52 dams failed. In addition, two sections of the levee adjacent to the Columbia Canal were breached and multiple unregulated dams failed. Many of the failed dams were constructed prior to any standards and permitting review and now need to be replaced with structures that will meet modern standards. However, many of the dams were privately owned and may be required to pass stringent threshold requirements for federal assistance.

As a result of the disaster, the State developed a task force (South Carolina Dam and Infrastructure Task Force) to address infrastructure concerns. This task force will discuss many issues regarding mitigation, risk assessment, and the overall enhancement of operations and maintenance of dams. The initial task force will consist of subject matter experts from many state and federal agencies.[25]

In addition, FEMA has initiated a Dam Assessment with funds from the Hazard Mitigation Technical Assistance Program (HMTAP). The Dam Assessment is for the collection of data on all dams breached as a result of the disaster. The combined data will ~~support~~ **determine** the need for additional Hazard Mitigation Grant Program (HMGP) project funding as well as many land use decisions and other recovery options that affect the State's critical infrastructure.[26]

Roads and Bridges

The storm impacted more than 541 roads and 221 bridges, and 25 bridges will require complete replacement. State maintained roads are now functional; however, there continues to be approximately 49 sections of roads closed, approximately half of which were caused by dam failures. The State is projecting a completion date of winter 2016 for the repair of all roads not associated with dam failure.[27]

In addition, there are approximately 21,000 paved and unpaved county and municipal roads that are not maintained or tracked by the State or a federal entity. These roads significantly impact rural communities and need to be assessed for repair. Local governments will spearhead these assessments in conjunction with emergency management officials as they progress through the Public Assistance process. There is the possibility that some roads impacted by the floods may qualify for assistance through Natural Resources Conservation Service (NRCS).

[25] South Carolina Recovery Support Strategy
[26] FEMA Advance Evaluation Assessment
[27] Mission Scoping Assessment and Recovery Support Strategy

Water & Wastewater Systems

Of the 71 wastewater treatment systems that experienced damage relating to flooding, there were no lengthy closures. To enhance existing systems or combine systems would improve efficiency. Many drinking water systems were impacted when breaks to their distribution systems occurred. All systems were rapidly restored and remain operational. The State will address flood damage actions for some plants through mitigation projects.[28]

Public Assistance

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

The Public Assistance Program for FEMA 4241 has identified $11,959,655.11 in public assistance need for Categories C-G (permanent repair) to date in the state-assessed counties, and issued $8,969,741.63 in funds towards those needs. These categories include:

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

Based on this data, a remaining unmet need of **$2,989,913.48** ***($11,959,655.11[need] - $8,969741.63[funded] = remaining unmet need of $2,989,913.48)*** in identified infrastructure damage eligible under FEMA-PA Categories C-G remains.

[28] South Carolina Recovery Support Strategy

FEMA Public Assistance Projects, Categories C-G, by County

Counties Receiving PA	Sum of Project Amounts (categories C-G)	Sum of Total Obligated Funds (categories C-G)	Unmet Needs
Abbeville	$442,118.06	$331,588.55	$110,529.51
Aiken	$115,987.17	$86,990.38	$28,996.79
Allendale	$ -	$ -	$ -
Anderson	$356,677.90	$267,508.44	$89,169.46
Bamberg	$156,448.60	$117,336.45	$39,112.15
Beaufort	$3,500.00	$2,625.00	$875.00
Berkeley	$1,454,014.56	$1,090,510.93	$363,503.63
Calhoun	$137,907.57	$103,430.68	$34,476.89
Charleston	$676,516.76	$507,387.58	$169,129.18
Chesterfield	$66,231.62	$49,673.72	$16,557.90
Clarendon	$449,198.22	$336,898.67	$112,299.55
Colleton	$111,345.25	$83,508.95	$27,836.30
Darlington	$109,124.36	$81,843.28	$27,281.08
Dillon	$ -	$ -	$ -
Dorchester	$824,539.64	$618,404.76	$206,134.88
Fairfield	$215,200.00	$161,400.00	$53,800.00
Florence	$643,339.45	$482,504.62	$160,834.83
Georgetown	$761,233.19	$570,924.90	$190,308.29
Greenwood	$231,935.06	$173,951.31	$57,983.75
Horry	$512,998.12	$384,748.60	$128,249.52
Kershaw	$722,927.24	$542,195.44	$180,731.80
Lancaster	$ -	$ -	$ -
Laurens	$70,712.55	$53,034.42	$17,678.13
Lee	$106,253.46	$79,690.10	$26,563.36
Marion	$75,874.50	$56,905.89	$18,968.61
Marlboro	$ -	-	
McCormick	$3,268.09	$2,451.07	$817.02
Newberry	$307,498.39	$230,623.79	$76,874.60
Orangeburg	$612,608.99	$459,456.77	$153,152.22
Saluda	$146,859.06	$110,144.30	$36,714.76
Spartanburg	$683,667.48	$512,750.61	$170,916.87
Statewide	$1,532,233.93	$1,149,175.48	$383,058.45
Sumter	$410,428.91	$307,821.70	$102,607.21
Williamsburg	$19,006.98	$14,255.24	$4,751.74
Totals:	**$11,959,655.11**	**$8,969,741.63**	**$2,989,913.48**
Richland*	$1,853,216.94	$1,389,912.71	$463,304.23
Lexington*	$1,473,743.27	$1,105,307.46	$368,435.81

FEMA PA Data as of 4/12/16

HMGP and Resilience

The Hazard Mitigation Grant Program (HMGP) will be a critical part of long-term resilience improvements for infrastructure in the impacted area. HMGP is generally calculated at 15% of the total amount of IA and PA allocated to the flood event. As of April 15, 2016, the amount available for mitigation and resilience activities statewide is $36,292,940.[29]

Then, calculating that HMGP assistance to any jurisdiction is capped at 75% of the identified need (the remaining 25% being a required local match), it can be assumed that jurisdictions will be required to provide $12,097,647.00 in local match, representing an unmet need for resilience improvements. The HMGP process is in its initial stages at this time, and will be rolled out over the coming months. As of February 2017, the State had not received requests for matching HMGP through the recovery program.

State-Led Recovery

In the early days after the October floods, South Carolina announced $5 million in emergency relief funds to the South Carolina Department of Transportation to fix storm-damaged roads and bridges. The money came from the Federal Highway Administration's Emergency Relief program, a federal funding source eligible to cover 100% of the costs of emergency repair work accomplished in the first 180 days after the disaster. Then, after the 180 days, it is eligible to cover 90% federal cost share for interstate highways and 80 percent federal cost share for all other highways.

Funding for ongoing state infrastructure repair is currently in development. FEMA match is being considered as part of pending legislation, "The South Carolina Infrastructure Finance Reform and Tax Relief Act," which would address funding, tax relief and reforms to South Carolina's two agencies that handle transportation projects, the Transportation Infrastructure Bank and the Department of Transportation.

Existing Efforts by South Carolina CDBG Non-Entitlement Program

The State of South Carolina's Community Development Block Grant (CDBG) Program, operated by the South Carolina Department of Commerce, received an annual allocation of $18,871,096 from HUD in 2016. Over $10.5 million of this was dedicated to community infrastructure activities such as water, sewer, roads, drainage or other activities. The other program funds (excluding planning and administrative costs) were $3,000,000 for Community Enrichment, $1,270,119 for Neighborhood Revitalization, $300,000 for Special Projects, $600,000 Ready-to-Go, and $2,000,000 for Business Development.

After the October floods, CDBG program managers reached out to their grantee communities to assess impact caused by the flood and to determine need for program response, including activating the provision in the Action Plan that "up to ten percent of the State's unobligated allocation may be reallocated to address the needs of the [declared] disaster" (2016 State Action Plan). The program did

[29] Source: FEMA Region IV Office

not receive sufficient response to activate the provision, and the 2016 program is expected to operate as planned to meet project needs that were identified before the flood.

Economic Impact

Business & Employment

According to FEMA reports, South Carolina's most impacted economic sectors were agriculture and tourism.

In the state of South Carolina, agribusiness represents a cluster of 60 agricultural sector components and 29 forestry sector components. Altogether, the agribusiness industry represented an output of $26.8 billion and accounted for 109,141 direct jobs representing 10.5% of the state's workforce in 2013.[30] The October floods impacted the state at a time when the forestry industry was just demonstrating recovery from the effects of the recession and decline in the paper market due to a competitive disadvantage against Canadian competition.[31] Similarly, in the months preceding the rainy season, South Carolina agriculture had been experiencing severe summer drought and harvests were already projected at a 50 percent loss.

Tourism, especially around the Upstate region of South Carolina and coastal areas suffered a short-term decline, but quickly bounced back to health leading to recent reports of growth and increase in jobs. Although the numbers look good, the storm caused a significant amount of coastal erosion, especially in tourism-driven areas, that resulted in the loss of hundreds of thousands of cubic yards of sand along the state's coast, according to South Carolina Beach Advocates.

As of April 15, 2016, the Small Business Administration (SBA) has issued $16,091,300.00 in Business and Economic Injury Disaster Loans (EIDL) to the state impacted area covered in this assessment.[32] Most of the loan applications have come from Berkeley, Charleston, Clarendon, Dorchester, Florence, Georgetown, Horry, Orangeburg, Sumter and Williamsburg counties.[33] Entities such as small businesses, small agricultural cooperatives, and most private nonprofit organizations in disaster impacted areas may apply for low-interest EIDL loans to assist with operating expenses and working capital. The Business Physical Disaster Loss loans are available for machinery, equipment, and other real-property damages.

Disaster Unemployment Assistance (DUA) is managed by the South Carolina Department of Employment and Workforce (DEW). The DEW explains that DUA "is a Federal program that provides temporary weekly assistance to individuals, including small-business owners and the self-employed, whose employment has been lost or interrupted as a direct result of a major disaster." Applications for DUA assistance must have been filed by November 5, 2015 (within 30 days after the available assistance was announced). The following table shows the number of weeks and amount of DUA claims paid out for each county area.

[30] South Carolina, South Carolina Department of Agriculture, 2015 Flood Impact on South Carolina Agriculture
[31] London & Associates, The Impact of the Agribusiness Sector on the South Carolina Economy, January 2015
[32] See Appendix for detailed breakout by NAICS code
[33] United State, Federal Emergency Management Agency, Advance Evaluation Team Report (Washington: FEMA, 2015 - excerpt here excludes Lexington and Richland Counties).

Disaster Unemployment Assistance Provided by County Area for SGAOR

County	Total Weeks Paid By County Since 10/6	Total Amount Paid By County Since 10/6	Average Amount Paid By County Since 10/6
Bamberg	*Data Not Available*	*Data Not Available*	*Data Not Available*
Berkeley	76	$9,804.00	$129.00
Calhoun	41	$5,207.00	$127.00
Darlington	*Data Not Available*	*Data Not Available*	*Data Not Available*
Dorchester	39	$8,183.00	$209.82
Lee	8	$1,401.00	$175.13
Horry	23	$2,840.00	$123.48
Lancaster	1	$127.00	$127.00
Clarendon	71	$12,226.00	$172.20
Colleton	1	$127.00	$127.00
Orangeburg	129	$19,977.00	$154.86
Spartanburg	5	$635.00	$127.00
Georgetown	98	$16,447.00	$167.83
Greenville	*Data Not Available*	*Data Not Available*	*Data Not Available*
Greenwood	*Data Not Available*	*Data Not Available*	*Data Not Available*
Sumter	139	$22,582.00	$162.46
Florence	33	$6,076.00	$184.12
Williamsburg	103	$15,449.00	$149.99
Fairfield	8	$1,302.00	$162.75
Kershaw	8	$1,070.00	$133.75
Charleston	58	$7,628.00	$131.52
Union	8	$2,608.00	$326.00
Marion	1	$127.00	$127.00
Newberry	*Data Not Available*	*Data Not Available*	*Data Not Available*
Totals	**850**	**$133,816.00**	**$157.43**
Richland*	564	$82,869.00	$146.93
Lexington*	75	$10,726.00	$143.01

Impact to Agribusiness

The State has a rich agricultural heritage that has provided South Carolinians with jobs, local food sources, and a viable trade commodity, with public port and transportation facilities in Charleston, North Charleston, Charleston County, Georgetown and Greer to support domestic and international trade. The favorable climate and steady water supply in South Carolina create ideal growing conditions.

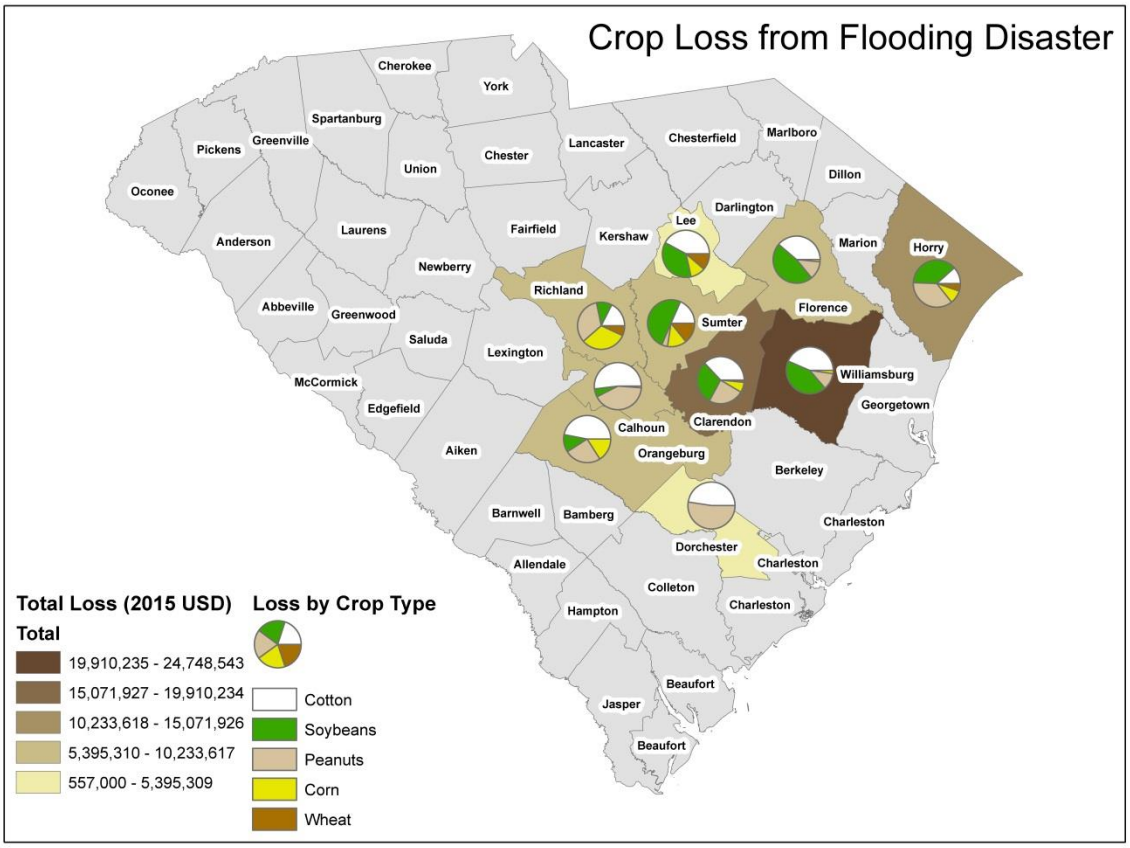
When the rains poured in October, the fertile lands of South Carolina were instantly flooded at record levels due to the ground and soil being freshly saturated with the seasonal September rain. Water levels broke rainfall records in at least nine cities across South Carolina. In the city of Summerville just north of Charleston, a record 18 inches was reported in just one day. The influx of rain water instantly flooded low-lying farmland adjacent to the multitude of river systems and creeks that cross the state. Several months later, farmlands have only partially recovered with subsided, but still-present water levels and the unbalanced PH levels in the soil that create unhealthy levels for plant growth and crop recovery.

South Carolina seedlings are estimated at 110,000 acres, a decrease of 35% from last year.[34] Some of the main commodities negatively impacted by the heavy rainfall and flooding were cotton, peanuts, fall vegetables, soybeans, and even timber. Additionally, chicken farmers have also been affected and must rebuild and repair roads in order to get feed to their stock. The year of 2015 was one of the most trying in history for farmers in South Carolina, as they experienced drought in the growing season and excessive rain and flooding during harvest.[35]

[34] Scott Miller, S.C. Farmers Face Wide Insurance Gap on Flood Losses, The Newsstand, 2 Feb. 2016

[35] Roddie Burris, SC Crops Heavily Damaged by Floods, Agriculture Commissioner Says, The State, 8 Oct. 2015

Self-Reported Crop Loss from 2015



Map shows Self-Reported Losses

Through the use of the most up to date USDA data, losses have been estimated for South Carolina's state-impacted counties. The data covers insured crops for which indemnity was received as a result of precipitation, excess moisture, or inability to plant from October 2015 through December of 2015. By coupling the Indemnity data and Coverage Level data from the USDA, a total loss estimate, and corresponding unmet need has been estimated.

From October to December of 2015, approximately $54,982,399.00 of indemnity was paid out to farmers who suffered losses due to South Carolina's historic flooding. The estimated total loss, derived by calculating the percent of insured crop not funded by the indemnity payments from USDA data, (for October through December) was approximately $76,068,698.00. This brings the estimated unmet need to $21,086,298.74 (Estimated Total Loss – Indemnity Paid) for the three-month period directly following the flooding.[36]

USDA Data for SGAOR: October – December 2015	
Actual Indemnity	$54,982,399.00
***Estimated* Total Loss**	$76,068,698.00
***Estimated* Unmet Need**	**$21,086,298.74**

It should be noted that there may be additional need identified once 2016 USDA indemnity data is released. The estimates referenced in this section do not include uninsured crops, losses on timber, or uncovered damage to machinery, facilities, and equipment. The cyclical nature of the agriculture business may result in additional losses continuing far past December of 2015, all as a result of the historic October flooding, and may be captured in an updated Unmet Needs Assessment at a later date.

However, the State of South Carolina passed legislation in May 2016 to provide additional aid to farmers that suffered 40% or more crop loss as a result of the historic rainfall and flooding. The State allocated $40 million dollars in state aid for farmers to apply for up to 20% of losses in an amount not to exceed $100,000. The focus of this particular State grant has been to give the farmers the funds necessary to be able to plant on their acreage and again produce commodities for the State while making a necessary profit to remain in business.[37][38] The Legislature has continued to take an active role in leading recovery initiatives for farmers, and State-led recovery programs. **When considering the availability of this $40 million in State funds as an available resource, the unmet need of $21,086,298.74 becomes a surplus of $18,913,701 in recovery funds made available, thus offsetting the unmet need amount.**

[36] Indemnity Data: http://www.rma.usda.gov/data/cause.html , USDA. Coverage Level Data: http://prodwebnlb.rma.usda.gov/apps/SummaryofBusiness/ReportGenerator , USDA.

[37] http://www.agweb.com/article/bill-allowing-south-carolina-farmers-to-receive-40-million-in-aid-advances-naa-associated-press/

[38] http://www.agweb.com/article/south-carolina-leader-hopes-to-give-farmers-relief-ahead-of-budget-naa-associated-press/

Drivers of Economic Resilience

Tourism

Even in the aftermath of a 1,000-year storm, the State of South Carolina's economy has shown growth. This short-term growth, in part, represents a shift away from the more common manufacturing jobs, and toward the leisure and hospitality sector, as well as the employment services sector. Coastal areas such as Myrtle Beach and the destination region of Pee Dee have experienced an increase in construction and service industry jobs in the last year. Although the storm brought significant coastal erosion, U.S. Army Corp of Engineers projects are underway to conduct beach re-nourishment. The growth of the tourism industry amidst unlikely odds is evident. Such growth under these conditions indicates the industry as a key driver of economic resilience in the state.

South Carolina Port Authority

South Carolina is one of few states with seaport access, which provides the state with a competitive advantage in attracting and maintaining export-oriented business. According to the South Carolina Department of Commerce, approximately 4,900 new jobs and $742 million in new economic activity was announced in South Carolina in 2014 from companies likely to require the use of a port facility to do business.[39] The majority of export and import activity derives from the manufacturing industry which generates a majority of the high wage jobs in the state. Over half of these jobs are concentrated in the northern region of the state. The manufacturing industry comprises 15.3 percent of all jobs in the Upstate region, compared to 11.5 percent for South Carolina as a whole.

[39] University of South Carolina, Division of Research Moore School of Business The Economic Impact of the South Carolina Ports Authority a Statewide and Regional Analysis, South Carolina: Sept. 2015

Action Plan

Section 4: Method of Distribution

CDBG-DR Program National Objectives

South Carolina has designed this CDBG-DR program in compliance with the National Program objectives, and will make every effort to ensure that assistance is prioritized toward the most disadvantaged populations. South Carolina intends to spend the majority of program funds on activities that benefit the Low-and-Moderate Income population. **The State will spend no less than 70% of funds allocated for direct benefit to LMI households. Furthermore, the state will take necessary steps to ensure that the needs of very low-income households (30% AMI or below) and low-income households (30% - 50% AMI) are prioritized, followed by moderate income households (51% to 80% AMI).**

As stewards of federal CDBG funds, the State of South Carolina 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, principally for LMI persons. To this end, all funded activities administered by the State of South Carolina will meet one of three named HUD national objectives:

1) Benefitting LMI Persons;
2) Preventing or Eliminating Slums or Blight; or
3) Meeting Urgent Needs.

Provisions of assistance will be made to eligible applicants in the impacted area, as funds are available, with priority given to applicants with verified household income at 80% or below the area median income (AMI) for the region in which they reside. ***HUD directed the State to spend at least 70% of the funds on LMI households. The State plans on assisting only citizens that are 80% LMI and below. The state will use SoVI to focus efforts to locate those citizens. Distribution of funds is based on the individual citizen.*** SCDRO Programs will begin by November 2016 and be completed by September 2019.

In addition, the State will further target benefits within these income categories by considering disability and age-dependent status. Where practicable, vulnerable and special needs populations will be given urgent attention.

Program Budget

The state will allocate all program dollars for housing recovery activities due to the demonstrated demand for housing assistance.~~, except for the $2.1 million for HMGP match~~. The following is a table of budgeted categories:

Program	Amount Allocated	Amendment 1
Single Family Housing Program	~~$88,135,650~~	$90,235,650
Rental Repair Program	$1,000,000	$1,000,000
~~**HMGP Match**~~	~~$2,100,000~~	$0
Planning	$750,000	$750,000
Program Administration	$4,841,350	$4,841,350
TOTAL	**$96,827,000**	**$96,827,000**

Program funds administered by the State will be made available to 22 of the 24 counties as declared in the official FEMA Disaster Declaration issued on October 5, 2015. These service areas will exclude the two counties of Richland and Lexington, and the City of Columbia, due to the direct availability of recovery funds for those counties appropriated separately by HUD. For the purpose of this Action Plan, the following counties are eligible for program assistance through the State:

> Bamberg, Berkeley, Calhoun, Charleston, Clarendon, Colleton, Darlington, Dorchester, Fairfield, Florence, Georgetown, Greenville, Greenwood, Horry, Kershaw, Lee, Marion, Newberry, Orangeburg, Spartanburg, Sumter and Williamsburg.

These counties are referred to as the State Government Area of Responsibility (SGAOR).

HUD has further stipulated that at least 80% of the allocation, or $65,494,200, must address unmet needs within the following sub-set of counties:

Charleston, Clarendon, Dorchester, Florence, Georgetown, Horry, Lexington*[40], Richland*, Sumter, Williamsburg

Leveraging of Funds

CDBG-DR funds are a last resort funding source. The state has worked with HUD, FEMA, SBA, other federal agencies and state-funded agencies to identify and catalog available sources of assistance for recovery from the floods. The State will ensure that CDBG-DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

- FEMA Individual Assistance grants
- FEMA Public Assistance grants
- FEMA Hazard Mitigation Grant Program

[40] Lexington and Richland Counties are not part of the State Government Area of Responsibility (SGAOR) for reasons described in this Action Plan.

- SBA Disaster Loans
- National Flood Insurance Program payments
- Private insurance
- Federal Highway Administration Emergency Relief Program
- Natural Resources Conservation Service Emergency Watershed programs
- Water Conservation District funds
- USDA Farm Service Agency's Emergency Forest Restoration Program
- Drinking Water and Water Pollution Control funds, and
- Private foundations

The State will seek out funding partners and attempt to maximize investments from additional financing sources for flood recovery efforts. Current sources identified for leveraged funds include:

- The One SC Fund
- The South Carolina State Housing Trust Fund
- South Carolina State Aid to Farmers

In accordance with the Robert T. Stafford Act, as amended, the state will implement policies and procedures to ensure no individual receives duplication of benefit for the same purpose and/or effect to recover from the floods. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss as to which he has received financial assistance under any other program, from private insurance, charitable assistance or any other source.

Housing Programs

Disaster Recovery funds are divided into three umbrella categories of eligible activity: Housing, Infrastructure and Economic Recovery. Based on analysis of the state's unmet needs and the limited amount of recovery funds made available, South Carolina will target recovery funds toward the most evident need in the area of Housing recovery.

The impact of the floods on the housing sector is estimated at a cost of $673 million in damage to single family homes and rental properties. Aging housing stock suffered damage across a full range of impact including flood damage and structural damage to roof and foundation from combined extensive rain. Hundreds of homes were destroyed or severely damaged, leaving families living in substandard or unsafe conditions, or causing them to be displaced from their communities and places of employment. **Due to the overwhelming unmet housing need, the Disaster Recovery Program will consist entirely of housing program activities at this time.** ~~**except for $2.1 million in HMGP match.**~~

To assist the most vulnerable families in their recovery efforts, the State has developed a housing program to meet the housing needs as identified through the unmet needs assessment to include:

1. Repair/Rehabilitation of existing housing units;

2. Replacement of damaged Manufactured Housing Units (MHUs) deemed unrepairable through a feasibility review;
3. Consideration of limited relocation assistance on a case by case basis; and
4. Inclusion, during the execution of these activities, as needed and appropriate, identification of opportunities for mitigation enhancement measures, improvement of resilience, ancillary improvements such as elevation and access ramps, and assistance to applicants in completing program applications.

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

In South Carolina, all counties and some localities require permits. All counties and the localities with such requirements have standing offices to process the required permits. There are currently no known local capacity issues, which would prevent the needed permits from being processed and issued. Further, the State's Housing portion of the Disaster Recovery should be exempt from having to pay local building permit fees for each home. The authority for this SECTION 6-9-110. "Ordinances or regulations requiring purchase or acquisition of permit or license; inapplicability to certain state and school district projects; jurisdiction of deputy state fire marshals and certified State Engineer's Office personnel. (A) A county, municipal, or other local ordinance or regulation which requires the purchase or acquisition of a permit, license, or other device utilized to enforce any building standard does not apply to a: (1) state department, institution, or agency permanent improvement project, construction project, renovation project, or property; or (2) school district facility, permanent improvement project, construction project, renovation project, or property which is reviewed and approved by the State Department of Education; except that the State Department of Education or a local school district may direct that the local ordinance or regulation apply to a particular facility, project, or property. (B) After successful completion of all requirements, the State Fire Marshal shall certify personnel of the State Engineer's Office of the Department of Administration designated by the State Engineer. The certified personnel and deputy state fire marshals, including resident state fire marshals, have exclusive jurisdiction over state buildings, including schools, in the exercise of the powers and jurisdictional authority of the State Fire Marshal under Sections 23-9-30, 23-9-40, and 23-9-50.

Where feasible, the State will follow best practices such as those provided by the U.S. Department of Energy's Guidelines for Home Energy Professionals—Professional Certifications and Standard Work Specifications. ~~New construction and replacement construction activities that include changes structural elements such as flooring systems, columns, or load bearing interior or exterior walls must fully incorporate Green Building standards. Rehabilitation construction will incorporate Green Building materials to the extent feasible according to specific project scope. Materials must meet established~~

~~industry-recognized standard that have achieved certification under at least one of the following programs:~~

For all new construction or for substantially rehabilitated structures, the State will require construction to meet an industry-recognized standard that has achieved certification under one or more of the following:

(i) ENERGY STAR ~~(Certified Homes or Multifamily High-Rise)~~,
(ii) Enterprise Green Communities;
(iii) LEED ~~(New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development)~~,
(iv) ICC-700 National Green Building Standard, (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite), or
(v) ~~any other~~ **an** equivalent comprehensive green building program.

For non-substantially rehabilitated structures, the State will follow the HUD CPD Green Building Retrofit Checklist guidelines, and apply them to the extent applicable in rehabilitation work undertaken to include the use of mold resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of rehabilitation work, the State will use products and appliances with ENERGY STAR labels, Water Sense labels, or Federal Energy Management Program (FEMP) designations.

South Carolina will implement and monitor construction results to ensure the safety of residents and the quality of homes assisted through the program. All Single Family, Rental and Mobile Home repaired must comply with the current HUD Housing Quality Standards (HQS). In addition, SCDRO has coordinated with DHEC to ensure applicants are aware of the risks associated with mold and take steps to limit the impact of any mold issues that may arise.

To prevent duplication of benefits, the State will require that all sources (federal, State, local, private) and amounts of disaster assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding. Duplication of benefit for housing assistance will only consider other sources of funding pertaining to structural damage caused by the floods; assistance for contents and personal items will not be considered duplication.

Applicant awardees must subrogate any additional funds received for damage caused by the October 2015 presidentially declared floods disaster back to the State. CDBG-DR funding must be funding of last resort and if additional funds are paid to applicant awardees for the same purpose as the housing assistance award they receive through State CDBG-DR funding (i.e., repair or replacement of the damaged structure) after the State has completed repair/rehabilitation project of the housing unit or replacement project of the MHU, those funds must be returned to the State of South Carolina.

Mobile Home Resilience

Due to the difficulty, expense, and long term ineffectiveness of mobile home repair, SCDRO will perform a repair feasibility analysis and replace damaged mobile homes that cannot reasonably be repaired. SCDRO will implement resilient practices to ensure the viability, durability and accessibility of replacement mobile homes.

- Although local building codes allow installation of Wind Zone I rated mobile homes, SCDRO will only utilize mobile homes with a minimum wind rating of HUD Wind Zone II or higher (able to withstand winds up to 100 MPH).
- SCDRO will adopt the 5'7" rule, prohibiting the installation of mobile homes elevated 5'7" above grade without appropriate structural reinforcement.

Single Family Housing Program

Applicants applying for assistance must have suffered documented damage to their housing units as a result of the October 2015 presidentially declared floods disaster. Such documentation may include an inspection report conducted by FEMA, SBA and/or a privately contracted inspector. ***The primary responsibility is on the citizen. In cases of demonstrable hardship or circumstances, the State may consider utilizing the implementation contractor to conduct an inspection to determine if the housing unit was damaged as a result of the October 2015 flood disaster. If the State does not believe the damage was a result of the October flood disaster, the citizen will be referred to a VOAD.***

All applicant homeowners will be held to the following criteria as condition of eligibility:

- Applicant must own and have occupied a single-family home or MHU located within the 22 counties, identified as the SGAOR, for which FEMA IA was approved for the October 2015 presidentially declared floods disaster area. (The SGAOR does not include Lexington & Richland Counties or the City of Columbia, as they received separate federal allocations).
- The property must have documented damage as a result of the declared disaster.
- Applicant must provide evidence of Primary Residence at the location in which the applicant currently lives or lived at the time of the event and for which they are seeking assistance. ***Households are allowed alternative ways to document proof of primary residency. They can do so by one of the following options:***
    - ***a. any one (1) of the following: proof of FEMA IA assistance, Federal income tax return showing their permanent home address, government-issued identification issued prior to and expiring after impacted period, or property tax homestead exemption;***

b. ***or by providing any two (2) of the following: utility bills mailed to the property address, vehicle registration or renewal at the address in the impacted period, receipt of government benefits received at least one month prior and one month after the impacted period, property insurance documents indicating the insured property as primary residence, or a sworn affidavit signed under penalty of perjury.***

- One person on the application with an ownership interest in part or in whole on the property must be able to demonstrate U.S. Citizenship or Lawful Permanent Residence.
- The homeowner must agree to own the home and use the home as their primary residence for a period of 3 years after rehabilitation or mitigation as secured through a forgivable promissory note and lien.
- If located in a flood plain, the applicant must acquire flood insurance and comply with obligations to notify future owners of flood-insurance requirements

In order to assist the most vulnerable populations with this disaster recovery funding, South Carolina intends to prioritize assistance for all housing programs based on the following criteria:

- Individuals who are in the extremely low and very low income brackets;[41]
- Persons with documented disabilities;
- Age-dependent household members (aged 65 or older, or 5 or below).

Priorities will be addressed as follows:

	HOUSEHOLD'S (AMI) AREA MEDIAN INCOME CATEGORY		
	30% AMI or BELOW	**31% AMI to 50% AMI**	**51% AMI to 80% AMI**
Applicant's Household Includes Both Age Dependent & Disabled, or Multiple Disabled Individuals	1st Priority	3rd Priority	5th Priority
Applicant's Household Includes *Either* Age Dependent or Disabled	2nd Priority	4th Priority	6th Priority
Applicant's Household Includes Neither Age Dependent or Disabled	5th Priority	7th Priority	8th Priority

[41] Applicants may review income limits for their household size by reviewing the table of income limits by county, available in the Appendix.

Because it is anticipated that the unmet needs of South Carolina's most vulnerable citizens will exceed the available funding, the State will assist all possible eligible applicants with households falling within these priority categories (in other words, under the 80% AMI threshold) before giving any consideration to extending housing assistance to those eligible applicants whose income is above the 80% AMI threshold.

Basis for Calculating Housing Assistance Awards

If eligible and awarded, housing assistance award calculations are based on the following factors:

1. Damage/scope of project work needed;
2. Pre-disaster housing unit value;
3. A review of funding from all sources to ensure no Duplication of Benefits (DOB); and
4. Availability of DOB funds, if any, for use in the project.

Housing assistance awards will be determined after factoring in the inputs listed above, subtracting any unaccounted for DOB, and then factoring in the pre-determined program assistance maximums that apply to the particular housing assistance activities to be used. Funds qualified as DOB may be required to be placed in escrow while assistance is provided. ***This process will follow guidance provided by: 21. Duplication of benefits, pages 54 – 55 of 81 FR 39702 (2016).***

If a determination is made during the process that the Assistance Awardee has a duplication of benefits, and the award is still on hand, the Assistance Awardee will be required to sign an escrow agreement with the Implementation Contractor. This agreement will require the Assistance Awardee to transfer all duplication of benefits funds to the Implementation Contractor who will deposit those funds into an escrow account. These escrow account funds will only be withdrawn in order to pay for qualified housing project expenses determined using the previously noted Basis for Calculating Housing Assistance Awards above.

The award maximums for each type of housing assistance are listed below:

- Single Family Housing unit (stick-built) repair/rehabilitation assistance awards: **up to ~~$25,000~~ $30,000 in Housing Recovery funds; and Manufactured Housing Unit (MHU) repair/rehabilitation assistance awards: up to $15,000**. Manufactured Housing Unit (MHU) replacement assistance awards – **up to $60,000 in Housing Recovery funds**; and
    - Exceptions to the $60,000 cap for manufactured housing unit replacement are ADA units which will be approved at the cost of a standard unit plus an additional $9,000.
- Modular/Stick-built Housing Unit replacement/substitution assistance awards – **up to $90,000 in Housing Recovery funds**;

- Exceptions to the $90,0000 cap for the reconstruction of a stick-built or modular home are 3 bedroom solutions which will be approved at up to $97,000 and ADA compliant homes that will be approved at an additional cost of $9,000 per home ($99,000 for 2 bedroom homes and $106,000 for 3 bedroom homes); and
- Limited temporary relocation assistance (case-by-case basis) for applicants in either single family stick-built or manufactured housing units– **up to $5,000**.

Housing Recovery funds may be combined with in-kind assistance, such as labor and materials provided by VOADs. The total amount of assistance when considering in-kind and private assistance shall not be limited by the corresponding cap on Housing Recovery funds, as the caps are related to SCDRO program funds only.

In cases of severe demonstrable hardship, the State may consider funding difficult or unexpected repairs above and beyond the housing caps.

Awards may include expenses for additional related costs such as elevation, insurance, ADA modifications or emergency repair of water or sewer connections. ***The State will address the access and functional needs of individual citizens in all phases of the recovery process especially in the intake and housing repair or replacement phases. Consideration will be made for citizens with communication limitations, disabilities, who are elderly, or have chronic medical disorder.*** Cost effective energy measures and improvements that meet Housing Quality Standards, especially those improvements which add enhanced resilience, such as elevation of major electrical components, roof-strapping, enhanced tie-downs and other items are also eligible. Lead-based paint abatement, asbestos abatement, or other remediation components shall also be eligible. Limited temporary relocation assistance will be provided to Applicants needing to move out of homes during construction on a case-by-case basis, up to $100,000 program-wide for the Single Family Housing Program.[42]

A grantee of the State may choose to use pre-disaster value, as provided in the guidance from 81 FR 39702 (2016), as long as the methodology is equitably applied. In addition, the State of South Carolina will allow any household to appeal its property valuation and provide rationale for why the valuation should be changed, should that household have reason to believe the valuation is incorrectly calculated because of historical inequity and/or other grounds.

Construction Warranties and Quality Appeals

South Carolina will provide assisted homeowners with a one year warranty on the work performed and funded by the Single Family Housing Program. Applicants will have access to a quality appeals process to

[42] The Uniform Relocation Act does not apply to the Temporary Relocation assistance described here due to the volunteer nature of the program.

address any construction quality concerns identified by the homeowner during the construction process. Construction quality appeals will be verified by inspection and decided by SCDRO.

Flood Insurance & Elevation

South Carolina will implement resilient home construction standards. South Carolina will follow HUD guidance to ensure all structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1 percent annual (or 100-year) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least two feet above the 1 percent annual floodplain elevation. Residential structures with no dwelling units and no residents below two feet above the 1 percent annual floodplain, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 1 percent annual floodplain.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are located in a FEMA designated floodplain. This requirement is mandated to protect safety of residents and their property and the investment of federal dollars. The elevation height of a house can significantly reduce the cost of flood insurance. South Carolina will implement procedures and mechanisms to ensure that assisted property owners comply with all flood insurance requirements, including the purchase and notification requirements described below, prior to providing assistance.South Carolina will ensure adherence to Section 582 regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so.

As a general rule, the State will not provide assistance for flood insurance. In cases of demonstrable hardship, the State may provide limited, temporary assistance for the provision of flood insurance in order to properly secure the federal investment in the property. ***The SC Disaster Recovery Board decided on 31 August 2016 to fund flood insurance for a one year period for any house or mobile home that the State repairs or replaces that is in the FEMA designated floodplain.***

Additionally, applicants found to be currently non-compliant with FEMA regulations or who failed to comply with the requirements of the National Flood Insurance Reform Act (NFIRA) are not eligible for assistance in the program. South Carolina will ensure thorough searches are executed to identify any potential applicants in a FEMA non-compliant status.

- An applicant is FEMA non-compliant if they failed to obtain and maintain flood insurance after receiving federal funding for a previous disaster.

Demonstrable Hardship

South Carolina may consider exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed to determine whether denial of program assistance further perpetuates circumstance attributing to such hardship. Demonstrable hardship may include but is

not limited to: prolonged job loss, substantial reduction to household income, death of a family member, unexpected and extraordinary medical bills, disability, etc.

Affordable Rental Program

The State's recovery program is primarily housing focused due to FEMA data showing that 76% of the LMI citizens effected were home or mobile home owners. The SCDRO will allocate $1 million in funding for an Affordable Rental Program to repair and restore the availability of affordable rental stock in the impacted SGAOR area. The program will provide up to $25,000 in assistance to rental property owners for eligible activities including the rehabilitation and associated improvements, such as energy efficiency and resilience activities, of single-family stick-built rental properties. Affordable Rental Program Assistance is limited to stick-built rental properties.

Benefit to Low and Moderate Income (LMI) persons is the only National Objective that is approved for the Rental Program. In order to receive assistance, the property owner must agree to a five-year affordability requirement. The affordability requirement requires the property owner to lease the units to LMI households earning 80% or less of the AMI and to lease the units at affordable rents. Rents must comply with the maximum HUD HOME rent limits. The maximum HUD HOME rents are the lesser of[43]:

- The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65% of the AMI, as determined by HUD, with adjustments for number of bedrooms in the unit. The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions.

The Affordable Rental Program will repair up to two units per rental property owner, with a $25,000 cap each. SCDRO may consider repairs beyond the $25,000 cap on a case-by-case basis.

~~Hazard Mitigation Grant Program (HMGP)~~

~~The State will designate $2.1 million dollars to match Hazard Mitigation Grant Program activities in the 22 counties within the SGAOR. Any match funding activities must meet CDBG-DR and HMGP eligibility requirements. Activities may include but are not limited to: structural elevation, localized flood risk reduction, infrastructure retrofit, and post-disaster code enforcement.~~

Anti-displacement

The State 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. This is not intended to limit the ability of the

[43] More information on HOME rents may be found at: https://www.hudexchange.info/manage-a-program/home-rent-limits/

State to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain.

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. The State will designate a URA specialist to ensure compliance with the Uniform Relocation Act (URA), where applicable.

Section 5: Program Administration

Citizen Participation Plan

The State values citizen and stakeholder engagement. South Carolina has developed a Citizen Participation Plan in compliance with § 24 CFR 91.115 and applicable HUD requirements to set forth the policies and procedures applicable to citizen participation, intended to maximize the opportunity for citizen involvement in the planning and development of the South Carolina CDBG-DR recovery program including but not limited to:

- The amount of assistance expected to be received by impacted communities;
- The range of eligible activities to be undertaken;
- Other Action Plan and program activities.

The goal of the Citizen Participation Plan is to provide all South Carolina residents with an opportunity to participate in the planning and assessment of the State's CDBG-DR recovery programs. In order to facilitate citizen involvement, South Carolina has laid out target actions to encourage participation and allow equal access to information about the program by all citizens, especially those of low and moderate income, those living in slum and blighted areas and in areas identified for recovery through CDBG-DR, non-English speaking persons, and other disadvantaged populations. ***The State will publish its Action Plan in English as well as Spanish.*** In addition to citizen involvement, South Carolina encourages the participation of regional and state-wide institutions, especially VOADs.

South Carolina will consider any comments received in writing, via email, or expressed in-person at official public hearing events. Additionally, in an effort to permit public examination and public accountability, South Carolina will make the above information available to citizens, VOADS, public agencies, and other interested parties upon request.

Public Hearings

South Carolina will hold ***Five*** public hearings during Action Plan development to collect early input from citizens impacted by the October 2015 floods. Notice of public hearings will be announced on the South Carolina Department of Commerce website and published in the local newspaper, as well as on social media. Public hearings will be held at a time and location convenient to potential and actual beneficiaries. ***The State will have the capability to take questions and comments in Spanish at each of the Town Halls.*** South Carolina will consider any comments or views of citizens received in writing or orally at the public hearing. The South Carolina Department of Commerce will prepare for each public event by utilizing the public hearing checklist found in the Appendix.

Individuals who require auxiliary aids or special assistance at public hearings should make a request at least forty-eight hours in advance of the event to the SCDRO by contacting (803) 896-4068 or ContactSCDR@scdr.sc.gov or the hearing impaired may call Relay South Carolina at 7-1-1.

Public Hearings will be held from June 27, 2016 through July 6, 2016 at the following locations:

i. Georgetown County
ii. Williamsburg County
iii. Sumter County
iv. Florence County
v. Charleston, Berkley, Colleton, and Dorchester

Public Notice and Comment Period

Notice of public comment period will be provided by publication on the Department of Commerce disaster recover website and in a local newspaper. South Carolina will provide notice and open the citizen comment period for the following time frames per action:

- Comment period for the original Action Plan will take place for fourteen (14) days after the publication of the Action Plan summary.
- Comment period for Substantial Amendments will take place for no less than fourteen (14) days after the publication of the Substantial Amendment summary.
- Comment period for Quarterly Performance Reports will take place for no less than three (3) days after the publication of the Action Plan summary.

Action Plan

The Action Plan defines how South Carolina will effectively use all available funding to support a data-driven recovery based on the calculation of unmet need across the state. The Action Plan describes the State's proposed allocation by activity and lays out program design for each area of assistance, as well as identifying the beginning and end dates for each disaster recovery activity, and performance and expenditure schedules. Before South Carolina adopts the disaster recovery Action Plan, the State will make available for public input, information regarding program design including the amount of assistance South Carolina expects to receive, the range of activities that may be undertaken, and the estimated amount that will benefit persons of low-to-moderate income, and plans to mitigate displacement.

A summary of all comments received will be included in the final Action Plan submitted to HUD for approval. The final Action Plan approved by HUD will be posted to the Department of Commerce website.

Amendments to the Action Plan

South Carolina will engage citizens throughout the program lifecycle to maximize the opportunity for input on proposed program changes that result in a Substantial Amendment. Program changes result in a Substantial Amendment when there is:

- An addition or deletion of any allowable activity described in the approved application;
- An allocation or re-allocation of more than $1 million; or
- A change in planned beneficiaries.

Citizens will be provided with no less than fourteen days to review and provide comment on proposed substantial changes. A summary of all comments received will be included in the final Substantial

Amendment submitted to HUD for approval. Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery website.

For other non-substantial amendments, the State shall notify HUD, but public comment is not required. Every amendment, substantial or not, shall be numbered sequentially and posted on the Department of Commerce website, not replacing, but in addition to all previous versions of the plan.

Performance Reporting

In accordance with HUD requirements, South Carolina will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Three days before submission to HUD, South Carolina will post each QPR for public review and comment on the Department of Commerce website. Program QPR's will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

Limited English Proficiency

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, and translators will be present. These populations will be identified through mapping of Census and other data or non-profit or stakeholder identification of need. The SoVI® Targeted, specialized outreach will be conducted to these populations in order to ensure proper notice of the opportunity to attend hearings or provide input on the proposed plan.

South Carolina is committed to providing all citizens with equal access to information about the recovery program, including persons with disabilities and limited English proficiency (LEP). The State 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 can be LEP and 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, and translators will be present.

As a result of initial population analysis, the Action Plan, any ensuing amendments, outreach materials and the application and related guidance materials will be published in both English and Spanish. When needed, the State will use an "I speak" visual chart containing a wide range of language samples for applicants to point to in request for specialized translation services

Technical Assistance

Upon request, limited technical assistance will be provided by Department of Commerce program staff. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The State may contract with a Technical Assistance Provider(s) should sufficient demand for technical assistance warrant. The State does not anticipate a significant demand for technical assistance because programs will be administered directly by the State, with limited participation by subrecipients or sub-grantees. The State has received HUD Technical Assistance for this grant.

Citizen Complaint Procedures

The State of South Carolina will handle citizen complaints through a Constituent Services Team, which will act as the program's "Ombudsman." All complaints received by the State, its CDBG-DR Contractor, and/or other program sources, will be reviewed by the Constituent Services Team for:

1. Investigation as necessary;
2. Resolution; or
3. Follow-up actions.

The aim of the State will be to always attempt to resolve complaints in a manner that is both sensitive to the complainant's concerns and that achieves a fair result.

The goal of the State and its Constituent Services Team is to provide an opportunity to resolve complaints in a timely manner, usually within 15 business days, as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe their application was not handled according to program policies. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

During the course of the program's operations, decisions will be made on housing assistance applications and/or housing unit projects to be delivered. These decisions will be made based on applicable statutes, codes of federal regulation, state and local codes and ordinances, local guidelines, and program operational procedures, as each is interpreted by the State of South Carolina. During the course of these activities, it is possible that citizens may decide they have a legitimate reason to appeal a decision. In order to allow for such circumstances, applicants are allowed to appeal program decisions related to one of the following activities:

1. A program eligibility and/or priority determination;
2. A program assistance award calculation; and
3. A program decision concerning housing unit damage and the resulting program outcome.

Citizens may file a written complaint or appeal through the Disaster Recovery email at ContactSCDR@scdr.sc.gov or submit by postal mail to the following address:

Attention: Constituent Services
South Carolina Disaster Recovery Office, 1205 Pendleton Street, Columbia, SC 29201

South Carolina will make every effort to provide a timely written response within 15 working days of the receipt of complaint, where practicable. If the complainant is not satisfied by the Department of Commerce Ombudsman response, the complainant may file a written appeal by following the instructions issued in the letter of response. If at the conclusion of the appeals process the complainant has not been satisfied with the response, a formal complaint may then be addressed directly to the regional Department of Housing and Urban Development (HUD) at:

Department of Housing & Urban Development
1835 Assembly Street, 13th Floor
Columbia, SC 29201

State Outreach

During the development of this Action Plan, the State will conduct in-person meetings with key regional stakeholders as well as the general public. The State has conducted meetings with County Administrators, key legislators, public representatives and the VOADs throughout the development of the unmet need, projected budget, recovery activities and program administration as set forth in this Action Plan. In addition, the state's outreach efforts have been heavily informed by the SoVI® identified areas in order to ensure the most vulnerable populations receive enhanced focus.

Intake centers will be established in multiple locations throughout the SGAOR, and additional outreach will be conducted through mobile intake centers, and continued community engagement throughout program implementation. ***All intake locations will have the capability to service citizens who have limited English speaking capabilities or require sign language.***

Program Income

The State does not intend to implement any programs that generate income as described in 24 CFR 570.489.

If program income is generated, the State of South Carolina will follow guidance provided in: 17. Program income alternative requirement on pages 44 – 48 of 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 transferred to South Carolina's annual CDBG award.

Pre-agreement Activities

~~South Carolina will follow provisions of 24 CFR 570.489(b) which permits the State to reimburse itself for otherwise allowable costs incurred on or after the incident date of the covered disaster.~~ ***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.*** The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by itself or its recipients or subrecipients 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 an eligible disaster covered under Public Law 114-113.

South Carolina's Department of Commerce incurred pre-award costs and is seeking reimbursement for these costs that are reasonable and allowable under this regulation. The Department of Commerce intends to recover the pre award costs consistent with the authority cited in this section. These costs include the cost for salary, employer fringe benefits, and direct operating cost for each employee based on their individual percentage of time spent on the planning of the CDBG-DR program during a pay period. This reimbursement will be returned to the SCDR's staff home agency. Any cost associated with the entire SCDR team would be allocated based on the total time spent on CDBG-DR activities versus other duties for a particular month. The total cost of the contractor to prepare the Action Plan and other costs associated with its preparation, meetings, community outreach and any other direct costs associated with the Action Plan will be reimbursed by this CDBG-DR grant.

Beginning April 2, 2016, the staff for the SC Disaster Recovery Group (SCDR) and a recently procured contractor began planning for the Community Development Block Grant – Disaster Recovery Program and developing the Action Plan. The SCDR was a group created by the Governor to handle the after effects of the October floods. This group was comprised of employees of various state agencies of South Carolina, including the SC Department of Commerce, and whom salaries and operating costs were paid by these home agencies. The Department of Administration, Department of Motor Vehicles and other agencies paid SCDR group expenses as they arose. Starting on April 2nd, SCDR staff began completing semi-monthly time sheets documenting their time working on CDBG-DR planning versus other duties.

Pre-award Implementation Plan

Section 6: Pre-award Implementation Plan

The South Carolina Department of Commerce is the administrator and fiscal agent for the CDBG-DR grant. The Department manages an annual budget of over $100 million and has prior experience in managing HUD funds through the CDBG allocation for many years.

Through experience with the annual CDBG program, the Department has existing systems and procedures, as well as formally established monitoring strategies that encompass cross-cutting regulatory requirements including HUD program rules and regulation, civil rights, environmental, labor standards, fair housing, citizen participation and recordkeeping. The newly developed CDBG-DR program will leverage these existing resources and adapt them to the requirements of Public Law 114-113 and related guidance.

South Carolina will manage grant funds responsibly, efficiently and transparently. The State has the financial management systems, policies, procedures and practices necessary to uphold fiscal responsibility as detailed in this Implementation Plan.

Financial Controls

The State of South Carolina certifies proficiency in financial management through the use of established financial systems and internal controls. The sections below provide further description of existing risk management measures.

Additional information can be found in the HUD Financial Management Guide, completed by the State, which answers specific questions about financial standards and which personnel or unit are responsible for each item. The completed guide and accompanying procedures will be submitted to HUD in addition to the Action Plan and Implementation Plan.

Single Audit

The State of South Carolina is in full compliance with Single Audit requirements. The State's annual expenditures are consistently reviewed every year by an independent Certified Public Accountant (CPA) to evaluate whether the State's major federal programs are in compliance with laws, regulations, contracts and grant rules as applicable to each program. The latest Single Audit report for the fiscal year 2015 is attached to this plan. The State maintains reports and working papers for each annual report for a minimum of three years from the date of submission to the Federal Audit Clearinghouse.

Under the existing structure for annual CDBG, South Carolina monitors Subrecipients for compliance with financial administration requirements in accordance with Single Audit requirements previously stipulated in OMB Circular A-133, now codified in 2 CFR 200, Subpart F. The Department requires all program subrecipients who expend more than $750,000 in federal funds during the fiscal year to submit their Single Audit review through the State's Federal Audit Clearinghouse or directly to the State for review for material weaknesses and findings or concerns. Subrecipient compliance with audit requirements has been

and will continue to be maintained through an internal monitoring tracking system updated on a routine basis. This system was designed as part of a corrective action plan to a Single Audit Finding in the South Carolina Statewide Single Audit for the Year Ended June 30, 2015. The audit identified that one of the program subrecipients failed to provide the State with a copy of their Single Audit by the deadline.

Financial Management Systems

South Carolina Department of Commerce maintains multiple accounting and grants management systems to support a multi-functional grants management program. In combination these systems provide accurate, current and complete disclosure of the financial status of each CDBG supported activity, according to the terms and conditions of the Grant Award Agreement. These systems are audit-tested and confirmed to meet all Federal and State requirements.

Recipient accounting records are supported by source documentation stored in compliance with record-keeping requirements. South Carolina has financial record-keeping practices to retain source documentation for accounting records that will be applied to the CDBG-DR program to ensure records adequately identify the source and application of CDBG-DR funds provided and maintain source documentation to evidence the costs incurred and dates of expenditure.

Internal Controls

The Department has existing policies and procedures meeting financial management requirements including: applicable regulations and requirements, financial accountability and records, authorized signatures for payments and checks, requests for payments, bank accounts and checks, escrow accounts, administrative costs, property management, and audit requirements. The department has cash management procedures in place that minimize the elapsed time between receipt and disbursement of CDBG funds. A copy of the current CDBG program manual, which includes these procedures, can be found on the public website at: http://www.cdbgsc.com/sites/default/files/cdbg/Manual/2015%20CDBG%20Manual%20-%20Rev%202-16.pdf.

The organizational structure encompasses risk management measures that establish clear lines of authority and approval, segregation of duties, separation of key processes and authorization and secure access to financial resources. The program financial division is overseen by the Chief Financial Officer with sub-divisions for Financial Management and Monitoring and Compliance. A full organizational chart can be found in the Capacity and Staffing section of this plan.

In summary, the Department's internal controls are set up for responsible management of CDBG-DR funds and support the prevention of fraud, waste and abuse to ensure:

- No person involved in the program decision-making obtains financial benefit
- No single-point sign-off of significant transactions
- Separate recordkeeping for disaster recovery funds versus general accounting operations

- Reconciliation of accounts performed by employees not responsible for handling payroll preparation and issuance of paychecks
- Hiring procedures match required financial skill sets to position descriptions
- Policies and procedures are in place to maintain effective control and accountability for all cash, real and personal property and other assets
- Policies and procedures are in place for controlled access to assets and sensitive documents
- Reasonable measures are in place to safeguard protected personally identifiable information (PII)

Procurement

Procurements for CDBG Disaster programs are governed by those specific procurement requirements set forth under 24 CFR Part 570, Part 85, 2 CFR 200.318-200.326 and all applicable state laws and regulations. Aligned with the requirements of these federal regulations, when procuring property or services to be paid for in whole or in part with CDBG funds, South Carolina shall follow its own procurement policies as those procedures are as stringent, or more so, than the federal procurement requirements. Furthermore, the state shall ensure that each procurement occurs with full and open competition.

South Carolina has a two-tiered procurement system for state agencies. Agencies have direct authority to make purchases below a certain dollar threshold. Above that amount (which differs for each agency), procurements are conducted under the authority of a central procurement office that serves all state agencies covered by the South Carolina Consolidated Procurement Code. Known as Procurement Services, this office involves three subdivisions with purchasing authority: the Office of the State Engineer (OSE), the Information Technology Management Office (ITMO), and the State Procurement Office (SPO).

The policies and procedures shall also include ethical standards of conduct governing employees engaged in the award or administration of contracts. Recipient will maintain a written code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts. Conflict of Interest provisions listed at 24 CFR Part 85.36 (3) and all other applicable federal regulations will be incorporated.

Generally, the governing statutes can be found at *Title 11, Chapter 35 of the South Carolina Code of Laws*. Procurements subject to the South Carolina Procurement Code are also governed by procurement regulations promulgated by the South Carolina Budget and Control Board, which are available in Article 19 of the South Carolina Code of Regulations. (The Procurement Regulations begin at Regulation 19-445.2000.) Methods of procurement (e.g., small purchase, sealed bids/formal advertising, competitive proposals, and noncompetitive proposals) and their applicability shall be specified by the state. However, cost plus a percentage of cost and percentage of construction costs methods of contracting shall not be used.

As outlined in the table below and in the South Carolina Procurement Code and Regulations, the state uses a variety of competitive source selection processes, including three simplified "small purchase" procedures, five standard competitive procedures (competitive sealed bidding, competitive best value bidding, competitive fixed price bidding, competitive on-line bidding, and competitive sealed proposals), qualification

based selection procedures for the acquisition of construction-related professional design services; and, indefinite delivery contracts for construction and related design services. A primary focus for the state is that opportunities be made available for small and minority businesses. Accordingly, the state maintains a robust Small & Minority Business Contracting and Certification Program.

South Carolina's procurement policies of the state align with the requirements set forth under 2 CFR 200.318-200.36 ensuring fair and open competition. Further ensuring consistency with federal requirements, South Carolina shall ensure that all purchase orders and contracts include any clauses required by Federal statutes, executive orders and implementing regulations. The full set of South Carolina procurement processes and the laws and regulations applicable thereto can be located at http://procurement.sc.gov/PS/vendor/PS-vendor-new.phtm.

The following table provides a cross-walk between the federal regulatory requirement and its counterpart under South Carolina's procurement law:

Federal Citation	Short Title	South Carolina Consolidated Procurement Code & South Carolina Budget and Control Board Regulations 19-45-445, et seq.	Short Title
2 CFR 200.318	*General Procurement Standards*	**§11-35-20**	*Purposes and Policies*
2 CFR 200.319	*Competition*	**§11-35-20(a)-(h)**	*Purposes and Policies*
2 CFR 200.320	*Methods of Procurement to be followed*	**§§11-35-1510-1580**	*Methods of source selection; Methods of Procurement to be followed including, but not limited to, Micro Purchases (§11-35-1550(2)(a)), Small Purchases, Competitive Sealed Bidding, Competitive Proposals and Non-Competitive Proposals/Sole Source*
2 CFR 200.321	*Contracting with Small, Minority, Women Owned Bus.*	**§§11-35-5010; 11-35-5210; 11-35-5230; 11-35-5240; 11-35-5260; 11-35-5270**	*Article 21: Assistance to Minority Businesses; includes: Statement Policy/Implementation, Regulations for negotiations with State Minority Firms; MBE Utilization Plan; Reporting; Division of Small/MBE Certification*
2 CFR 200.322	*Procurement of Recovered Material*	**§11-35-3810; 19-445.2150**	*Surplus Property Management*
2 CFR 200.323	*Contract Cost and Price*	**§§11-35-2010(1); 11-35-3510; 11-35-1830; 11-35-1210(2)(C); 11-35-1550(2)(a); 11-35-1830; 11-35-3040; 11-35-3050; 11-35-3410(2)(a); 11-35-5230(a)(5)**	*Cost and/or Pricing Data; Contract Price Adjustments; Cost Principles; Fair and Reasonable Price Minority Firms*
2 CFR 200.324	*Federal Awarding or pass-through Entity review*	*(Compliance with this reg. to be achieved through execution of implementation of grant agreement with HUD)*	
2 CFR 200.325	*Bonding Requirements*	**§11-35-3030; 19.445-2145(C)(M)**	*Bond and Security*
2 CFR 200.326	*Contract Provision*	**§11-35-3040**	*Contract Clauses and their Administration*

Duplication of Benefit

In accordance with the Robert T. Stafford Act, as amended, the state will implement policies and procedures to ensure no individual receives duplication of benefit (DOB) for the same purpose and/or effect to recover from the October 2015 floods. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss as to which he has received financial assistance under any other program, from private insurance, charitable assistance or any other source. The State has already drafted a program policy manual with guidance that funds determined to be a duplication of benefit will be deducted or otherwise offset from the amount of assistance available to the applicant through the Housing Recovery Program.

To prevent DOB, the State will require that all sources (federal, State, local, private) and amounts of disaster assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding. The State will procure a qualified vendor to implement DOB procedures in review of each application. The hired vendor will perform a basic calculation known as the Housing Assistance Award Calculation which is completed by: (1) Determining each applicant's remaining recovery need; and then (2) Reducing that remaining recovery need by previously received funding for housing recovery, if any (less amounts expended on Allowable Activities). This activity will be monitored for accuracy and completeness by the State Monitoring and Compliance division.

The State will consider all amounts received/approved from alternate sources such as FEMA, insurance coverage, SBA and/or philanthropic organizations used to make repairs due to the declared disaster damage. Duplication of benefit for housing assistance will only consider other sources of funding pertaining to structural damage caused by the floods, assistance for contents and personal items will not be considered duplication. The State currently has secured data sharing agreements with FEMA and SBA to ensure the most recent assistance data is used in confirming other Federal assistance.

<u>If an applicant was offered SBA, but declined the award, the program will document the amount of the declined award as well as the circumstances that caused the applicant to decline the award. In such situations, the Special Case Panel will review these documents and circumstances on a cases-by-case basis to determine:</u>

- <u>If allocating CDBG-DR resources to the applicant's home is necessary and reasonable; and</u>
- <u>If the CDBG-DR award should be offset by the amount of the declined SBA loan.</u>

All applicants will be required to sign a Subrogation agreement upon application to the program. Applicant awardees must subrogate any additional funds received for damage caused by the flood disaster back to the State. CDBG-DR funding must be funding of last resort and if additional funds are paid to applicant awardees for the same purpose as the housing assistance award they receive through State CDBG-DR funding (i.e., repair or replacement of the damaged structure) after the State has completed repair/rehabilitation project of the housing unit or replacement of the Manufactured Housing Unit (MHU), those funds must be returned to the State of South Carolina.

Timely Expenditure

Timeliness of expenditure for the grant funds under Public Law 114-113 is defined as 6 years from the time of HUD's execution of the grant agreement. South Carolina will comply with this timeline by implementing effective budgeting and maintenance of expenditure projections. Within the 6 year grant timeline, there are also requirements for prompt payment as part of the general financial management process. The State will reconcile these projects with actual transactions as tracked in the general ledger on a regular and frequent basis.

The State will track expenditure projections over the life of the award utilizing the HUD-provided Projection of Expenditures and Outcome Template, in conjunction with the Disaster Recovery Grant Reporting (DRGR) system. South Carolina will submit a complete projection of expenditures within 120 days after the initial Action Plan has been submitted through the DRGR system. Revised projections will be sent to HUD when program changes impact projected outcomes, funding levels, and recovery timelines.

The State of South Carolina has adequate databases and procedures in place to monitor program expenditures, track timeliness of expenditures, evaluate grant recipient performance, and monitor overall financial and programmatic compliance status of HUD grant funds. The State has existing, mature systems in place to administer HUD CDBG grants, which have been audit-tested and received no findings from HUD regional or OIG audit teams.

The State will manage financial transactions through the SCEIS record system, and will use either its existing grants management system or an alternative file or record system operated by the Implementation Contractor who will undertake implementation of the State's CDBG-DR grant, provided that the alternative system can provide comparable utility with respect to financial and programmatic grant management. The grants management system contains extensive detail about grant-funded projects and is used to generate award documents, financial reports, voucher summaries, fiscal and program year HUD grant financial status reports. It is also used to generate payment vouchers when pay requests are received from grant recipients. For HUD CDBG grants, these vouchers are entered into the State's SCEIS financial database and then into the HUD database.

With respect to timely expenditures, the state will track expenditure projections based on the date the HUD CDBG-DR grant is signed, award dates for all subrecipients of CDBG-DR funds, payment request dates and amounts, and date funds are received from HUD. Other data elements will be added as necessary to provide information sufficient to monitor timeliness of recipient expenditures, time elapsed since last recipient draw, time elapsed since recipient grant award, percent of recipient grant drawn compared with progress on the funded project, as indicated by recipient status reports, etc. Grants which appear to be

lagging will be evaluated and, consistent with the State's CDBG-DR Action Plan, either: a) provided technical assistance to remediate their slow progress state, b) terminated if the project appears to be stalled at startup and the Action Plan allows for re-award to other eligible recipients, or c) the project scope will be reduced and the recipient award reduced as necessary and recaptured funds re-obligated to other eligible projects and recipients. As with the State's existing CDBG Program, the focus will be on identifying fast-moving projects and recipients that have already demonstrated competence in expeditiously moving projects forward, drawing funds and moving projects toward completion.

Consistent with the State's CDBG-DR Action Plan, the goal will be to obligate funds that will be available for recipients (i.e., excluding funds set-aside for program administration) as soon as possible in order to maximize the amount of time new recipients have to implement projects and expend available funds. Recipients will be required, as they are for the State CDBG Program, to identify under-budget contracts, changes in beneficiary eligibility, project scope changes, etc. as soon as possible, so as to identify funds recipients are not expected to draw, identify recipients with on-track, timely implemented projects where recaptured funds can be redirected if recaptured, and reduce funds awarded to non-performing recipients or recipients at risk of non-performing. Where necessary, the State will identify additional eligible recipients and projects, per the State's CDBG-DR Action Plan, that have existing funded projects and require additional funding for new/expanded project activities, or that have projects that can move forward immediately and expeditiously expend funds and accomplish program goals and comply with all applicable requirements.

Management of Funds

The monitoring plan as outlined in this section may include the items below, ~~but will be finalized upon hiring the internal audit director by July 2016~~. Monitoring will be conducted by the ~~State~~ ***Department of Commerce and the SCDRO*** based on a pre-defined risk analysis and will be conducted on a frequency as determined by the analysis which will include frequent desk review and periodic on-site visits. ***SCDRO monitors funds using the HUD Disaster Recovery Grant Reporting (DRGR) system and weekly meetings hosted by the Contracts Manager and Statistical and Research Analyst III (DRGR Specialist.) Audit functions are conducted by the designated Department of Commerce auditors hired to support this program as shown on page 98, Financial Roles, of this document.*** The risk analysis will consider criteria consistent with HUD guidance and individualized risk mitigation strategies will be prepared for each funding recipient. The State will follow steps for identifying risks that include the following:

- Identify what CDBG-DR projects and performance areas are to be assessed;
- Insure that risk is identified and analyzed;
- Assign weight to risk factors;
- Develop rating criteria and methods to assessing risk;
- Determine rating by factor;
- Establish criteria for risk "profiles" for each Funding Recipient;
- Compile scores and rank organizations; and
- Utilize resources for monitoring and risk mitigation.

The State may initiate additional, unscheduled monitoring efforts at any time based on analysis of risk indicators. The State will utilize existing processes for the annual CDBG program for conducting on-site reviews that include written monitoring and technical assistance guidelines, checklists, and policies and procedures. Project files will be reviewed for compliance with HUD requirements.

In July 2015, the HUD field office reviewed monitoring procedures, execution of those procedures and adherence to guidance and timelines. The final audit report determined the state's oversight and monitoring program to be in compliance with HUD standards. In the most recent HUD On-Site Monitoring Report conducted July 2015, HUD determined "that the State's oversight/monitoring of its recipients meets the standards found at 24 CFR 570.492 and the Housing and Community Development Act (HCDA) Section 104(e)(2) to conduct reviews and audits of its recipients to determine compliance with applicable laws and Title 1 regulation." A copy of the report can be found attached to this plan in appendix format. ***SCDRO will continue to use similar procedures and processes to manage and audit funds for this grant.***

Contractor compliance will be maintained through the review and approval of monthly project performance reports, financial status reports, and documented requests for reimbursement throughout the contract period. The State will utilize the HUD- provided contract reporting template (for PL 113-2) for upload to the DRGR on a quarterly basis: https://www.hudexchange.info/resource/3898/public-law-113-2-contract-reporting-template/.

Beginning shortly after commencement of contracted activities, risk-based on-site monitoring will occur as appropriate to contracted activities and award amounts. At least one on-site monitoring visit will occur prior to project completion, to verify funds were expended appropriately.

All program activities will meet HUD requirements for national objectives, which will be supported by documentation in the program file system of record. ***South Carolina does not intend to undertake activities other than those activities authorized by the CDBG program CFR 570.201-206. Examples of ineligible activities include:***

- ***Buildings for the general conduct of government,***
- ***General government expenses,***
- ***Financing for partisan political activities,***
- ***Purchases of equipment,***
- ***Purchases of personal property, and***
- ***Operating and maintenance expenses for public facilities.***

South Carolina is dedicated to prioritizing assistance toward residents that face the most financial barriers to recovery and fully intends to comply with the HUD Low-to-Moderate Income (LMI) national objective requirement of 70% of the total grant. Residents will be required to provide household income information and supporting documentation at the time of application for processing and verification. South Carolina will apply a methodical approach to applicant assistance that assigns priority to program applicants based on household income and other social vulnerability factors. Recovery funds will be accounted for in order of ranked priority (utilizing the eligibility prioritization matrix of the Single Family Housing Program) to allow program staff to consistently budget funds toward the most vulnerable beneficiaries, in as fluid a manner as possible.

The State is in the process of hiring a Director of Internal Audit and expects to have the position filled by July 2016. The audit staff overseen by the Director of Audit will perform a full compliance and financial audit review. The vendor 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 contract;
- 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;
- In accordance with Generally Accepted Government Auditing Standards (GAGAS);
- Adequately documented; and
- Treated consistently (with non-CDBG costs).

The State of South Carolina is dedicated to the prevention of fraud, waste and abuse. All suspected cases of fraud will be taken seriously and reported to the South Carolina Office of the Inspector General for further investigation: http://oig.sc.gov/Pages/default.aspx.

Comprehensive Disaster Recovery Website

In accordance with HUD requirements, South Carolina will maintain a public-facing website with program information pertaining to applicants and stakeholders posted on an ongoing basis. The initial website will reside on Disaster Recovery page of the existing South Carolina Department of Commerce website at http://sccommerce.com/south-carolina-disaster-recovery-assistance during action plan development and program setup. A new website may be designed at a later date. The State plans to design, launch and maintain a customized program website shortly after execution of the Grant Agreement and program implementation begins. The public website serves as a central source for program information and transparency in the management of federal dollars. It is a powerful tool for public participation and engagement. Additional posted information may include:

- Procurement policies and procedures will be posted to a permanent page on the website

- Executed CDBG-DR contracts will be posted to the website on a quarterly basis to reside on a permanent page.
- Critical information regarding the status of services or goods currently being procured by the State for the CDBG-DR program will be posted in real-time during formal procurement processes (*e.g.,* phase of the procurement, requirements for proposals, etc.). Once the procurement process is closed, these documents will be removed from the website and contracts for hired vendors will be posted as aforementioned executed CDBG-DR contracts.

The State of South Carolina follows ADA-compliant standards for website accessibility and readability. Content and webpage layout is designed with best practices for adaptive aids use in mind. The State also supports accommodation for citizens with limited English proficiency and will publish program documents to the public website in languages other than English based on the need of non-English speaking communities.

The Marketing and Communication division of the Department of Commerce maintains ownership of the Department's current website and thus will be involved in publishing all content to the Disaster Recovery page. Content for the site will be generated from all aspects of the program and will be drafted by operational staff with purview over the subject matter. All content will undergo draft review before final approval prior to posting. The following program information that will reside on the website includes but is not limited to:

- Announcement of Public Hearings will be posted to the website as well local newspapers.
- Action Plan for Disaster Recovery will be posted for no less than 14 calendar days to solicit public comment before being submitted to HUD. The final approved Action Plan will then be posted to a permanent section on the website designated for Action Plans and Amendments.
- Substantial Action Plan Amendments will be posted for no less than 14 calendar days to solicit public comment before being submitted to HUD. The final approved Action Plan Amendment will then be posted to a permanent section on the website designated for Action Plans and Amendments.
- Non-substantial Action Plan Amendments will not be posted for public comment. These Amendments will be posted to a permanent page designated for Action Plans and Amendments.
- Each Quarterly Progress Report (QPR) will be posted for no less than 3 days to solicit public comment before being submitted to HUD. The final QPR will then be posted to a permanent section designated for Reporting.
- The Citizen Participation Plan will reside permanently on the website.
- An electronic portal for citizen complaints will be located on the website and messages received through the portal will be monitored by the Constituent Services Team for prompt response.

- Program announcements will be posted to the website on a rolling basis as approved by the Program Director.

Timely Information on Application Status

Program applicants are South Carolina's top priority for this recovery program. South Carolina will implement a centralized application management system with real-time access to application status. Applicants can obtain timely communication about their application status at any time during operational hours by contacting a case manager via telephone, leaving an after-hours voicemail message to be returned the following business day, or by submitting an email inquiry.

Case managers will be available for face-to-face intake meetings as requested by the applicant. Accommodations can be made ahead of time for applicants with physical disabilities and/or a need for translation services. The State is also seeking web-based interactive capacity as part of its procurement of an Implementation Vendor so that applicants may log on to the application system of record and view their application status.

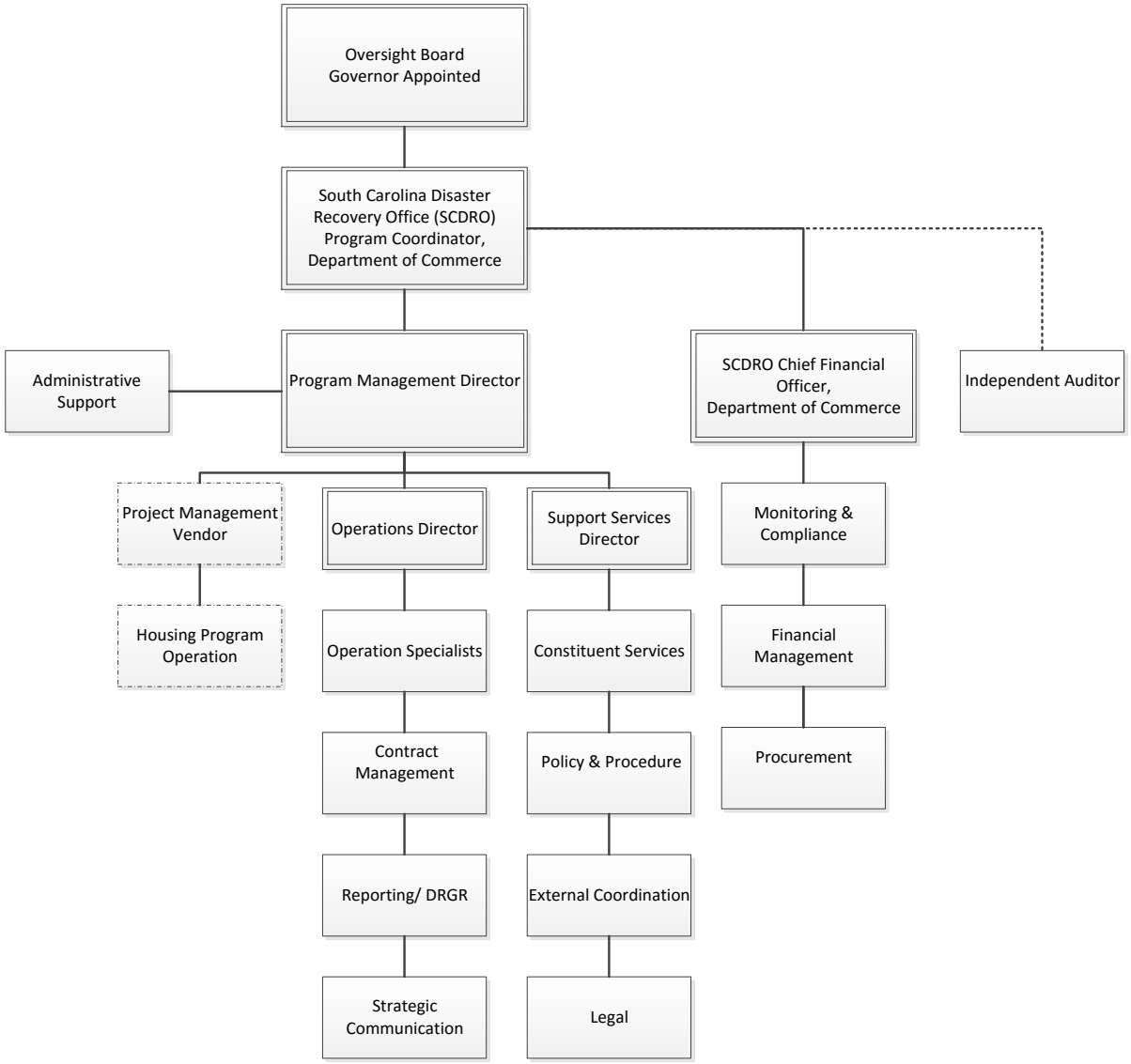
Proactive communication from the program regarding application status will occur on a frequent basis during initial intake. At which time, program staff will proactively contact applicants to request missing eligibility documentation and verify information entered on the application form. Once all documentation is received, verbal communication may subside until the applicant is contacted through an official letter with information regarding eligibility.

The State will also institute a Constituent Services Team focused on resolving complaints in a timely manner, usually within fifteen (15) business days, as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe their application was not handled according to program policies. All applications, guidelines, and websites will include details on the right to file a complaint or appeal, and the process for filing a complaint or beginning an appeal.

Capacity Assessment & Staffing

South Carolina has conducted a thorough capacity assessment and developed the current administrative structure (as shown below) for positions to support critical management, oversight and implementation.

South Carolina Disaster Recovery Office: Administrative Structure



Key staff members, particularly those in the financial management section, have prior experience with the HUD CDBG annual program and will transition seamlessly into CDBG-DR program positions with minimal training to expand understanding of program differences. **The position descriptions outlined below align with the functional areas identified in the organizational chart and may include technical SCDRO titles not detailed in the organizational chart.**

SCDRO positions are as follows[44]:

[44] The organizational chart and corresponding positions outlined in this plan may be modified as needed throughout the implementation process as warranted by the needs of program.

The South Carolina Recovery Advisory Board - In Place

The State Disaster Recovery Advisory Board advises the South Carolina Disaster Recovery Office (SCDRO) team regarding general directives, strategic policy decisions and prioritization of the state's recovery efforts. SCDRO represents diverse interests across the state, communicates and coordinates services and events, and provides strategic planning for the recovery response.

The State Recovery Advisory Board members are appointed by the Governor. Members of the Advisory Board elect the chairperson.

SCDRO Program Coordinator – Filled

The State Disaster Recovery Program Coordinator, ensures that the program activities align to the State Advisory Board's general directives, strategic policy decisions and prioritization. The SCDRO Coordinator also ensures proper and adequate evaluations of programs, provides for financial solvency and security; preserves independence and enhances the public image among all constituencies. The SCDRO Coordinator functions in the accountable role of Chief Executive Office and signatory.

SCDRO Program Management Director - Filled

The SCDRO Program Management Director directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the State. The SCDRO Program Management Director takes a holistic view of implementation as sets of project activities, linking internal local government activities with those of the community's stakeholders to ensure progress and completion of outcomes identified in state plans, strategies, or other recovery objectives. This position reports to the SCDRO Program Coordinator, who serves as Executive Officer of the program.

Administrative Assistant - Filled

This position provides administrative support for the Disaster Recovery Management Director and Disaster Recovery Office. In addition to typing, filing and scheduling, performs duties such as financial record keeping, coordination of meetings and conferences, recording and transcribing board minutes, obtaining supplies, coordinating mailings, and working on special projects. Also, answers non-routine correspondence and assembles highly confidential and sensitive information. Deals with a diverse group of important external callers and visitors as well as internal contacts at all levels of the organization.

Director of Operations - Filled

The Director of Operations provides overall management, strategic operations, administrative support, and communication for the recovery effort. The Director 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.

Operations Specialist - Filled

The Operations Specialist provides technical support and leadership to other managers within the Disaster Recovery Coordination Office; ensures that the highest quality of customer service is provided at all of the delivery systems within the Office; provides administrative support in areas of compliance, project management, training and development, regulations, policies and procedures.

Director of Support - Filled

The Director of Support provides recovery leadership on general direction, overarching policies, and prioritization of recovery efforts. Capabilities to support this recovery activity include, representation of diverse interests, communication and coordination among community organizations and leaders, and strategic initiatives. Communicate and collaborate with volunteers and key stakeholders. The Director manages operational level personnel, procedures, legal services and record keeping.

Public Information Director - Filled

The Public Information Director is responsible for Disaster Recovery informational programs which are diverse and/or numerous and which are essential to the recovery office's mission and participates in top management policy decision making. The Public Information Director is responsible for communicating the organization's position on topics and issues to the media and public in general.

Public Information Specialist - Filled

The Public Information Specialist interfaces with the public and media or with other agencies with incident-related information requirements. The Specialist performs professional level work in development and dissemination of disaster recovery informational material and promotion of recovery activities.

Project Coordinator (Assistant Operations) - Filled

The Project Coordinator is responsible for basic SC Disaster Recovery Office (SCDRO) work products and project management techniques. The Coordinator manages various complicated projects under the direction of a higher-level management.

Project Coordinator-Policy - Filled

This position is responsible for 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) Disaster Recovery Coordination eligibility, case maintenance and management.

Statistical and Research Analyst III - Filled

The Statistical and Research Analyst performs highly specialized work in complex data management and statistical systems such as the Disaster Recovery and Grant Reporting Systems (DRGR Systems) and other data management systems and projects for the SC Disaster Recovery Office. The Analyst assists in the preparation of databases which provides current information regarding the program activities underway including funding data and must be able to develop and analyze complex reports.

Attorney IV - Filled

The Legal Advisor provides legal counsel and guidance to the Disaster Recovery Coordination Office, Managers and Steering Board/Committee on disaster recovery plans and activities. The Legal Advisor represents the Disaster Recovery Office of the SC Department of Commerce.

Constituent Services Manager - Filled

The Constituent Services Manager serves as Ombudsman for the Disaster Recovery Coordination Office (DRCO). This position manages the process for providing accurate and timely interaction/response to constituents. Communicates and facilitates processes in support of effective interaction between the DRCO and the public. The Manger develops and implements comprehensive communications plans relating to researching, managing and resolving constituent complaints and concerns.

Constituent Services Assistant - Vacant, Applications under review

Constituent Services Assistant receives complaints from the public by phone, mail and in person, makes referrals to other agencies and assists in informal resolution of complaints. Investigate complaints concerning disaster recovery operations. Performs research, formulates objective opinions, and makes recommendations for corrective action, preventative measures and the promotion of competency, efficiency, and equity in disaster recovery efforts. Perform various administrative functions in the office of the ombudsman.

External Coordinator - Filled

The Volunteer Coordinator works with government entities and volunteer organizations and Volunteer Organizations Active in Disasters (VOADs) to staff recovery efforts. The Volunteer Coordinator communicates and collaborates with volunteers, key stakeholders, and the general public. The Coordinator will also facilitate the overall receipt and disbursement of donations at the local level and Coordinates with VOADs for the disbursement of donations.

Contracts Manager - Filled

Contracts Manager works with vendors, suppliers of goods and services through every phase of vendor contract performance. From negotiation to termination, contract managers' job duties include reviewing proposals, evaluating compliance with requirements and regulations, maintaining communication to ensure timely execution, and analyzing contract documents. The Contracts Manager also provides guidance to and supervises team members on contracts administration, concepts and regulations.

Financial Management Roles

Chief Financial Officer – Filled

The Chief Financial Officer Directs and oversees all aspects of the Finance, Procurement and Accounting functions of the program. This position is responsible for directing the development and establishment of policies and procedures as it pertains to finance and accounting.

Controller – Filled

The Controller serves under the Chief Financial Officer and is accountable for accounting and procurement. This position will oversee the accounting and procurement functions to ensure that adequate controls are in place for reporting and to ensure that payments/procurements are timely and accurate. The Controller will manage the development and establishment of policies and procedures as it pertains to accounting and procurement.

~~**Procurement Specialist – Will Not Hire Exclude**~~

~~**The Procurement Specialist plans and coordinates the routine service procurement functions of the program, issues complex procurement solicitations in accordance with the SC Procurement Code and Regulations. Ensures that all procurements are made in conformity to the procurement code and are made in an accurate and timely manner.**~~

Grant Manager – *Filled*

The Grant Manager is responsible for managing both grants and contracts for agency services; monitors compliance with contractual provisions. Performs managerial professional duties in accounting, budgeting or finance.

Fiscal Analyst II *(3) – Vacant, Expected to be filled November 2016 – May 2017*

The Fiscal Analyst performs professional duties in the creation and maintenance of accounting records the verification and documentation of financial transactions or the preparation and management of program budget.

Director of Internal Audit – *Filled*

The Director of Internal Audit will direct and manage a professional staff in conducting audits, investigations and evaluations of the administrative, financial and operational activities of the program.

Internal Auditor (3) – Vacant, Expected to be filled October – December 2016

The Internal Auditor will perform audits or oversees 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.

Additional Capacity

The State will procure a qualified vendor to provide case management services to all housing program applicants. Case Management staff will be required to have knowledge, experience and /or skills to work with applicants to determine eligibility and duplication of benefits, as well as have a basic knowledge of data base management applications to support the management of applicant files. Case Managers will provide applicants with first-line communication to inform them of their obligation to provide a complete and accurate program application, advise them on methods to obtain necessary eligibility documentation, answer questions about program assistance procedures and anticipated timelines, and provide them with a well-informed intake experience. The applications and the documentation collected from applicants are highly sensitive and will be handled by case management staff in a confidential manner.

South Carolina has leveraged partnerships throughout the recovery process and will continue to do so with the valued involvement of the Volunteer Organizations Active in Disaster (VOAD) community. These partners operate independently of the State, but interact daily with the very residents the CDBG-DR program is designed to serve. Their interaction with disaster-impacted residents will continue throughout the lifecycle of the CDBG-DR program, and thus, the State of South Carolina has designed the housing program to include continued involvement of VOADs.

Internal and Interagency Coordination

The SCDRO will implement an **Interagency Recovery Coordination Group** to continue its multi-stakeholder approach. SCDRO team members originated from a variety of state agencies as part of the immediate response framework. This included agencies such as the South Carolina Department of Health and Environmental Control (DHEC), the South Carolina Department of Motor Vehicles, and the South Carolina Department of Commerce amongst others. This multi-agency formation has been key to considering recovery from a holistic perspective. Moving, forward, the Interagency Recovery Coordination Group will consist of a comprehensive group of state agency, non-profit, and civic stakeholders who will be convened by SCDRO on a monthly basis to discuss progress in the long-term recovery process.

Technical Assistance

Technical assistance to program participants will be provided by Department of Commerce program staff as needed. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The state may contract with a Technical Assistance Provider(s) should sufficient demand for technical assistance warrant. In addition, the State received significant technical assistance throughout the development of the Action Plan.

Depending on the nature of assistance required, the State will coordinate with HUD to obtain an available provider, or engage in a formal procurement to hire a vendor with the expertise required to provide technical assistance in regulatory compliance, construction management, environmental procedures, etc.

To ensure orderly and effective compliance with the National Historic Preservation Act (NHPA) during recovery undertakings, the SCDRO in compliance with: 18. Reimbursement of disaster recovery expenses on page 48 of 81 FR 39702 (2016), has met with representatives of the South Carolina Historic Preservation Office (SHPO). SCDRO intends to sign and execute the FEMA/HUD approved Programmatic Agreement (PA) (Unified Federal Review Memorandum of Agreement) provided by HUD. SCDRO and SC SHPO have discussed the processes that will be utilized ensure review and compliance with Section 106 of the NHPA where required to so. The State's Disaster Recovery Office will also consult with the State Fish and Wildlife Service (South Carolina Department of Natural Resources) and the National Marine Fisheries Service concerning section 7 of the Endangered Species Act prior to program implementation as required by 81 FR 39702 (2016).

The state does not anticipate a significant demand for technical assistance since programs will be administered directly by the state, with no subrecipients.

Accountability

The Governor of South Carolina has designated the South Carolina Department of Commerce as the administrative and fiscal agent responsible to HUD for program oversight, reporting and compliance. Program administration will be led under the direction of the Disaster Recovery Program Director of the South Carolina Department of Commerce with oversight from a Governor Appointed Oversight Board of three members. The Governor-appointed Board will provide executive level oversight of the Disaster Recovery Housing Program. The South Carolina Disaster Recovery Office Program Coordinator, housed in the Department of Commerce, is an executive-level appointee who will serve at the direct guidance of the Board. The Program Coordinator will serve as authorized signatory of the legally binding grant agreement (contract) between HUD and the state, will authorize major contracts and change orders, certify to financial reporting, and serve as the lead point of contact for HUD, including for monitoring and compliance and issue resolution.

The Program Management Director will oversee daily operations of the program, including applicant intake and eligibility, construction and contract management, policy and procedure, public information, and reporting. The Chief Financial Officer at the Department of Commerce will oversee compliance and monitoring, financial management, and oversight of the HUD line of credit, including management of the Disaster Recovery Grant Reporting (DRGR) system and timely expenditures.

SCDR will initially rely on the CDBG expertise of a number of members of the State's Department of Commerce. SCDR will contract with a vendor for CDBG expertise not available currently. This expertise

will be used to conduct the SCDR's monitoring plan and to train SCDR personnel in CDBG regulations, policies and procedures. Simultaneously, SCDR will develop CDBG expertise internally through available in person and on line training. This three pronged approach will be leveraged during the management of this contract. IAW this action plan, the State has already hired a contract manager as stated on page 97 to oversee the implementation vendor.

Certification of Accuracy of Risk Analysis Documentation

The State of South Carolina hereby certifies that it currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the State has reviewed the requirements of this notice and requirements of Pub. L. 114-113 applicable to funds allocated by FR-5938-N-01, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that it has in place proficient financial controls and procurement processes; that it has adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; that it has to maintain a comprehensive disaster recovery website to ensure timely communication of application status to applicants for disaster recovery assistance, and that its implementation plan accurately describes its current capacity and how it will address any capacity gaps.

[Signed in Certifications section]

_____

Signature

Appendices

Appendix: Sample Public Hearing Preparation Checklist

Hearing Preparation Activities	Responsible Person(s)
__Confirm town hall location, date and time	_____
__Determine staff attending town hall	_____
__Schedule appropriate meeting facility	_____
__Notify appropriate officials (Federal, state, local)	_____
__Determine security requirements	_____
__Determine staff to document public comment	_____
__Schedule accommodations for disabled or non-English speaking residents	_____
__Determine display requirements	_____
__Prepare and issue public notice (Press Release)	_____
__Notice posted on Website and Facebook	_____
__Produce pamphlets/handouts for town hall clients	_____
__Distribute news release	_____
__Ensure microphones/speakers are available	_____
__Laptop (ensure supporting presentation)	_____
__Projection screen	_____
__Projector (ensure compatible with laptop)	_____
__Determine what equipment is necessary: (flags and standing base; podium; tables, chairs)	
__Develop/produce sign-in sheets	_____
__Distribute news release/media advisory	_____

SAMPLE

Ensure the following items are available at the hearing:

__Agenda (Slide Presentation)	_____
__Client Forms for Collecting Information/Feedback	_____
__Clipboards	_____
__Ink Pens	
__"I Speak" cards if no translators present	_____

Response to Public Comment

County Comment Session: 6/27/16

Comment:

Which flood plain maps do we use?

Response:

The maps in place at the time of program implementation will govern flood plain requirements.

Comment:

Did the applicant have to have a FEMA verified loss over $5,000 to be eligible?

Response:

No, neither having received or applied for FEMA assistance is required in order to be eligible.

Comment:

Is there an application period?

Response:

The proposed application period is from November 2016 to March 2017; however this decision will be put before the Disaster Recovery Board for a final decision in August 2016 and publicized heavily.

Comment:

With the $6 million VOAD set-aside, is that limited to certain VOADs?

Response:

All VOADs used in this process must hold a Federally Recognized status.

Comment:

Would recommend increasing the age for priority to households with children to eight, ten or twelve years old instead of five years old.

Response:

The state reached out for additional consultation with the University of South Carolina in regards to this recommendation. Based on significant academic research related to social vulnerability criteria, the state believes that five years of age is the appropriate cutoff for age-dependent status for the young and has decided to maintain that criteria.

Comment:

The state should ensure that as much local workforce development as possible is done in conjunction with the program.

Response:

This recommendation has been useful in informing our requirements for the vendor Request for Proposal (RFP) process. We anticipate not only to comply with federal Section 3 requirements, but to have significant local-hiring goals as part of the procurement process.

Summerville Town Hall: 7/5/16

Comment:

If up to $25,000 will be able to put into each home, where will the additional money for the program go?

Response:

$25k will be the rehabilitation cap for repair to rental properties and for repairs to single family homes. However, some severely damaged homes may need to be replaced, and the cap for those homes may be up to $60k or $90, depending on the type of replacement needed. At the discretion of the state, the rehabilitation cap may be raised if an overall savings is created through repairing versus replacing a home.

Comment:

How was the decision made that only housing will be addressed and not cars, and other belongings?

Response:

In compliance with CDBG-DR regulations, the recovery funds governed by this plan may not be used for personal belongings or vehicles. Other programs, such as FEMA Individual Assistance or non-profits may be able to provide assistance for those non-structural items.

Comment:

How can I be certain if I am in the system? I have called 211 and was referred to Hearts and Hands.

Response:

SCDRO Housing Program will be integrated with Hearts & Hands. Additionally, SCDRO will incorporate a concerted effort reach our target population. H&H will refer clients to SCDRO whom they feel meet SCDRO eligibility requirements. If you have signed up with H&H, and you

meet SCDRO eligibility requirements, we will work to contact and coordinate future actions with you.

Comment:

How will ownership of property be addressed for paid off homes that have been passed down from generations?

Response:

Demonstration of ownership will be addressed on a case-by-case basis. However, several options may be available, such as providing copies of deeds, property tax documentation, etc.

Comment:

How will my issues with losses on home, furniture, and cars be addressed?

Response:

If you meet the eligibility criteria, a damage inspection will be conducted to determine the amount of damage to your home, and a Duplication of Benefit review will be done to account for any funds you have previously received. This will result in the amount of assistance you may be eligible to receive for eligible costs, such as structural repairs, in accordance with program caps. Personal belongings and vehicles are not eligible under CDBG-DR funds.

Comment:

I have called 211 and been referred to Hearts and Hands, but am unsure of my next steps in getting help?

Response:

See answer above.

Comment:

How was the most vulnerable population identified if they did not all register with FEMA?

Response:

Most vulnerable populations will be identified during eligibility intake sessions. Both those with a FEMA verified loss and with a disaster related loss who meet eligibility requirements will be eligible to register for assistance.

Comment:

How will the vendor be selected?

Response:

The vendor will be selected through a formal Request for Proposal (RFP) process and selected to give the State of South Carolina the best value and greatest level of service. The process will be done in accordance with the State Procurement Code.

Comment:

Will LTRGs be eligible for any of the $6 million set aside for VOADs?

Response:

LTRGs are valuable partners in the recovery process; however, this $6 million dollars will be set-aside specifically for Federally Recognized VOADs who will be providing direct assistance to the housing program. VOADs will be identified by the vendor as part of a comprehensive plan to provide as many homes to the highest priority citizens as possible.

Comment:

The Low Country had elderly populations that began filling out FEMA, but stopped because the process was too difficult.

Response:

Our program is designed to prioritize assistance to the elderly and disabled, and specialized outreach will be conducted to reach as many socially vulnerable applicants as possible. FEMA assistance is not a requirement to be eligible for CDBG-DR.

Comment:

Mobile Homes and real property are taxed separately.

Response:

Primary residence and ownership requirements will be reviewed for the mobile home structure itself, and counties will assess both the structure and the real property.

Comment:

There needs to be interaction with local governments that have regulatory jurisdiction.

Response:

Construction will be conducted in accordance with applicable state, local, and federal requirements.

Florence Town Hall: 7/6/16

Comment:

Have renting to own scenarios been addressed for the program?

Response:

Rent-to-own scenarios were considered as a program option, however, due to the limited amount of funds and anticipated unmet need from existing homeowners, we will not consider a rent-to-own program for inclusion.

Comment:

Will the program have water/utilities funding, and volunteers/construction groups?

Response:

The program will cover costs for ancillary utility hookup fees on a case-by-case basis if warranted by the damage and home replacement needs. Federally recognized VOADs will continue to play an important role in the recovery process.

Comment:

Are properties to be brought up to floodplain standards?

Response:

Properties eligible for the program that are located in the floodplain must be raised to standard elevation as part of their repair/rebuild/refurbishing process. Generally, this means elevating the property at least two feet above the one percent annual floodplain elevation.

Comment:

Who will be evaluating and ensuring properties are restored to safe and sanitary standards?

Response:

A qualified construction inspector will be tasked to ensure compliance with HUD Housing Quality Standards (HQS).

Comment:

Who will be doing the intake and will there be sharing of intake information between Cans and Vendor, and will there be a meeting with VOADs before RFP to discuss possible merging of intake?

Response:

Intake and eligibility will be the responsibility of the SCDRO-procured vendor. The VOADs will continue to play an important role in the recovery process. This may include preliminary intake and/or sharing of information between CANS and the vendor, depending on the program design and data-sharing agreements established between the vendor and Hearts and Hands and other Federally Recognized VOADs as necessary.

Comment:

It seems as if a vendor will use up money allocated for the disaster, what is the point of hiring a vendor?

Response:

The state will utilize a competitive procurement process to ensure the best value and greatest level of service is provided to the program. The vendor will be required to be highly skilled in the disaster recovery process, particularly with HUD CDBG-DR, which will provide the state with best practices learned from around the country and allow us to serve program applicants as best as possible.

Comment:

What exactly will the vendor's job be?

Response:

The expectations of the vendor will be outlined in a formal Request for Proposal (RFP) process through criteria outlined in a Scope of Work. The RFP will be available online on the www.SCommerce.com website.

Comment:

Is the same process being used as in other disasters (i.e. NJ, Louisiana, etc.)?

Response:

The state has done significant research on what has worked well, and what could have been done differently, in the various CDBG-DR programs throughout the country. We have utilized best-practice CDBG-DR eligible program design components and modified them to suit the unique needs of South Carolina.

Comment:

Can it be stipulated that the vendor be from SC?

Response:

The selection process will be set up in a manner which provides the best value for the state, and requirements for local hiring may be laid out in the RFP.

Comment:

Is the Board racially diverse and why (if it is so) are they all from Columbia?

Response:

The board was carefully assembled of qualified individuals prepared to serve the citizens of South Carolina and is comprised of 2 males and 1 female board member. While all board members may not be from the Columbia area, they do work there.

Comment:

What is the rationale behind using a single vendor?

Response:

The rationale behind hiring a single vendor is to streamline accountability and performance requirements, and obtain economies of scale that should provide the best opportunities to get the most South Carolina citizens back in homes.

Comment:

Is the state planning to help with flood insurance?

Response:

As a general rule, the State will not provide assistance for flood insurance. In cases of demonstrable hardship, the State may provide limited, temporary assistance for the provision of flood insurance in order to properly secure the federal investment in the property.

Comment:

How can farmers apply for Farm Aid?

Response:

Farmers can apply for Farm Aid by calling (803) 734-2210 or going to https://agriculture.sc.gov/sc-farm-aid/ for information on the application process. Rapid mobilization is essential in order to meet the program's August 15, 2016 application deadline.

Comment:

Why were farmers not included in this Federal allocation?

Response:

Farmers who meet the eligibility requirements may receive housing assistance through the program. Regarding recovery funds for economic development purposes, the South Carolina Farm Aid Grant Program, which came into effect on May 24, 2016, makes $40 million dollars in state funds available to farmers who suffered at least a 40% loss of an affected crop as a result of last October's flooding. To set-aside limited federal funds on top of the $40 million in state funds would place vulnerable populations at risk of becoming homeless. The State's top priority is to get vulnerable citizens into safe, sanitary, and secure homes.

Comment:

Why isn't money being made available for farmers' infrastructure damage?

Response:

See answer above.

Comment:

Farming is a top industry in SC and needs help meeting unmet losses.

Response:

See answer above.

Comment:

The current case management system is flawed because LMI people will not respond to the CAN system.

Response:

Our program is designed to prioritize assistance to low-and-moderate income people, and the elderly and disabled, and specialized outreach will be conducted to reach as many socially vulnerable applicants as possible. It is highly likely that the state-procured vendor will utilize an intake system other than CAN in order to provide the best possible service to applicants. Key in securing LMI participation will be a extensive outreach. Outreach efforts and publication will go out through the State, County and Municipal associates, as well as faith based organizations to

ensure every reasonable effort is made to ensure eligible citizens are informed and given the opportunity to participate.

Comment:

Farmers attended tonight to receive insight and are concerned about only receiving $40 million despite a Clemson study showing an estimated loss of $365 million.

Response:

The Clemson study is an independent study that developed projected loss amounts into the future. It is anticipated that even amongst the housing sector, there will be much more disaster-related loss than there is to fund the unmet needs. However, the $40 million in state funding for agriculture is almost half the total of $96 million in funds that will be available for tens of thousands of homeowners across 22 counties.

Comment:

Concerned that farmers will not be able to remain whole/survive with only the $40 million in State Aid. Would like to receive additional state aid since not included in CDBG-DR funding.

Response:

Due to limited federal funds and significant disaster need, the program is not designed to bring recipients to a "make whole" status. CDBG-DR funds are funds of last resort, intended to fill unmet need of homeowners and residents after insurance, SBA, FEMA and other assistance is accounted for. Even in the housing program, applicants will be brought to safe, decent, and sanitary housing levels and may not be "made whole" when compared to their pre-disaster status.

Comment:

Concern that program won't be able to function with only single vendor. Although this would be great, due to the costs associated with additional vendors.

Response:

Performance requirements will be part of the procurement and contracting process.

Comment:

Would like to see an open Q and A session where individuals can stand and ask questions to the entire group instead of having breakout Q and A sessions.

Response:

Due to the number of attendees at the Town Hall meetings, we felt we could provide quicker, more personal outreach to interested individuals by having multiple teams of program staff available to take comment and answer questions.

Comment:

Public comment should be held for the group as a whole.

Response:

See answer above.

Comment:

The poor may find it difficult to find or get to the Town Hall location (such as FMU). Would like to see churches or courthouses used because they are often more accessible and centrally located.

Response:

Although the federal regulations only require the plan to be posted online for comment, every effort was made to inform as many groups as reasonably possibly while providing a rapid HUD submission. The Town Hall sessions were well attended and included state representatives, county administrators, and the press at all 5 meetings. Once the program is conducting intake for applications, significant, customized outreach will be conducted to include locally-relevant locations.

Comment:

Heir properties may not be as simple as presented and seemed oversimplified. May need to reconsider and ask questions such as "who is the lien with?"

Response:

Detailed heirship issues will be handled on a case-by-case basis as part of the eligibility process.

Williamsburg Town Hall: 7/7/16

Comment:

Who will enforce the landlord/tenant requirements, and will this be in the RFP?

Response:

The state will retain responsibility for program compliance; however, the administrative functions of program requirements may be overseen by the vendor.

Comment:

Is assistance available if a citizen had to purchase a new vehicle due to the flood and now has higher car payments?

Response:

In compliance with CDBG-DR regulations, the recovery funds governed by this plan may not be used for personal belongings or vehicles. Other programs, such as FEMA Individual Assistance or non-profits may be able to provide assistance for those non-structural items.

Comment:

Is assistance available if a citizen was given some insurance money to help with mold issues, but didn't resolve the issue and has since had to pay for related doctor visits?

Response:

If you meet the eligibility criteria, a damage inspection will be conducted to determine the amount of damage to your home, and a Duplication of Benefit review will be done to account for any funds you have previously received. This will result in the amount of assistance you may be eligible to receive for eligible costs, such as any remaining mold remediation or structural repairs, in accordance with program caps. Doctors visits are not an eligible program expense.

Comment:

Farmers have been given zero help, but lost a year of income plus loans, and interest owed on operating equipment. Why have farmers been excluded?

Response:

Farmers who meet the eligibility requirements may receive housing assistance through the program. Regarding recovery funds for economic development purposes, the South Carolina Farm Aid Grant Program, which came into effect on May 24, 2016, makes $40 million dollars in state funds available to farmers who suffered at least a 40% loss of an affected crop as a result of last October's flooding. To set-aside limited federal funds on top of the $40 million in state funds would be duplicative in purpose. Farmers can apply for Farm Aid by calling (803) 734-2210 or going to https://agriculture.sc.gov/sc-farm-aid/ for information on the application process. Rapid mobilization is essential in order to meet the program's August 15, 2016 application deadline.

Comment:

Who can I contact for help with getting my mobile home raised to meet floodplain standards?

Response:

The application period will be highly publicized once the intake process begins. All potential applicants are encouraged to apply to determine if they meet the eligibility criteria. Should you be eligible, home elevation and repair may be possible based on damage inspections, a duplication of benefit review, and program caps.

Comment:

How can someone who was "red flagged" by FEMA get in this system? (person still has all of the FEMA money, and needs it to be applied to replacement or rebuild)

Response:

The application period will be highly publicized once the intake process begins. All potential applicants are encouraged to apply to determine if they meet the eligibility criteria. Should you be eligible, home elevation and repair may be possible based on damage inspections, a duplication of benefit review, and program caps.

Comment:

How will 2nd or 3rd generations living in homes (heir properties), but not owners be able to prove ownership if they are unable to get the lien in their name?

Response:

Detailed heirship issues will be handled on a case-by-case basis as part of the eligibility process.

Comment:

What is the alternative method to making appeals if people do not have access to the internet and can't appeal online?

Response:

The state will have an Ombudsman and Constituent Affairs office, who will be able to provide assistance in alternative formats (phone, mail, etc.) for applicants.

Comment:

Individuals have had issues with condemnation and zoning when trying to repair their homes due to changes in zoning. These houses need to qualify under nonconforming use and be fixed to the point that they are made livable. While I recognize this is not a part of the action plan, the State should address this through policy or regulation.

Response:

Construction will be conducted in accordance with applicable state, local, and federal requirements.

Comment:

The slide about making a choice between purchasing flood insurance or not accepting aid from this program needs to be reassessed because there are individuals with limited income (i.e. just SSI) that can't afford flood insurance.

Response:

As a general rule, the State will not provide assistance for flood insurance. In cases of demonstrable hardship, the State may provide limited, temporary assistance for the provision of flood insurance in order to properly secure the federal investment in the property.

Comment:

It seems as if small businesses are being overlooked in the process. It is difficult for small business owners to afford everything from insurance, to loan paybacks, and covering losses from flooding.

Response:

The state has chosen to prioritize the limited available funds for use in housing due to the significant unmet need in housing. There are several available assistance programs targeted towards small businesses, such as the very low interest loans offered by the Small Business Administration (SBA) and the state-funded Farm Aid. We recommend reaching out to SBA for assistance on targeting those resources.

Sumter Town Hall: 7/11/16

Comment:

There is no contact information to provide from the Housing Trust Fund Flood Initiative Program.

Response:

To contact the Housing Trust Fund Flood Initiative Program please get in touch with

Laura Nicholson, via email, at laura.nicholson@schousing.com, or by phone, at

(803)896-9001.

Comment:

As a nonprofit, we collect and already have much of the information needed from potential clients. Is there any way we can fit in to help distribute information, collect case management info, or help the SCDRO in other capacities?

Response:

The procured vendor will be responsible to determine how to best utilize registered VOADs across the state to assist with this program to potentially include portions of outreach, intake and document collection up to the cap of $6 Million.

Comment:

Is assistance available to restore the damaged Town hall building in Mayesville?

Response:

The State has chosen to prioritize the limited available funds to use in housing due to the significant unmet housing need across 22 Counties. We recommend that local leaders reach out to other support agencies for possible assistance.

Georgetown Town Hall: 7/12/16

Comment:

My brother lived in a home during the flood that will eventually belong to me (commenter). Will I be able to get assistance for that house too?

Response:

The program will handle detailed heirship issues on a case-by-case basis. However, to receive assistance the property must also be your documented primary residence at the time of the storm. Assistance will not be given to a homeowner for two separate properties.

Comment:

I am a landlord and my property was damaged. How and where do I apply for assistance?

Response:

Landlords are able to go through the application process for the program for up to 2 properties in the same manner as any applicant to the program, but must meet the specific requirements and guidelines laid out for landlords and rental properties in the Action Plan.

Comment:

Flood victims should not be forced to pay private contractors to provide a damage estimate, just to be able to apply for a loan or flood insurance.

Response:

Flood Victims under the SCDR Housing Program will not be forced to pay private contractors for any activities and if an applicant for this program is told otherwise they should report it immediately to the SCDRO.

Comment:

How will homeowners who are heirs' property owners receive services?

Response:

Detailed heirship issues will be handled on a case-by-case basis as part of the eligibility process.

Additional Comment(s)

Comment:

We operate a nonprofit that owns two 8-bed facilities to house individuals with intellectual disabilities. We've received substantial assistance, but some costs—such as operating costs—have not been covered. Is there room in the action plan for nonprofit housing entities in general, and for costs not specifically related to building?

Response:

Thank you for your comment. We truly value the feedback. As laid out in the Action Plan, this CDBG-DR allocation is aimed at providing assistance strictly for housing as opposed to economic development and infrastructure costs such as operating costs, billing, or renovations.

Formal Letters

Comment:

Patty K. Stewart

SC Disaster Recovery
SC Dept. of Commerce
1201 Main Street, Suite 1600
Columbia SC, 29201

Dear SC Disaster Recovery Team,

I want to thank you for the hard work and time you have put into the draft of the CDBG (Action Plan) and the time and energy you will expend in upcoming years to help our fellow South Carolinians recover from the disaster. I truly appreciate the work you are doing and I am pleased that you plan to assist the most vulnerable first.

I have only one issue with the overall plan: I strongly believe Clarendon County should be included in the counties that are slotted to receive 80% of the funding. I am aware that HUD made this decision, but I am asking that you petition HUD to reconsider adding Clarendon to the list. The need in Clarendon County is great and if they can only pull from 20% of the funding there will be far too many low income South Carolinians left without help.

Before I continue, I want to tell you a little about myself and some personal stories so you can understand my perspective and why this recovery is important to me. I am an art teacher in Greenville, S.C. My husband and I used to teach in Summerton, SC (Clarendon County), we care about that community and its struggles very much. Following the floods we heard of the devastation and wanted to help our former students. We were told many of them lost everything in the flood and we knew that replacing school supplies would be a hardship to their families. We gathered school supply donations in Greenville and delivered 110 backpacks to Summerton. During that trip we visited Ms. Elretha Lawson. Ms. Lawson used to babysit our children and a friends child. That friend told us we needed to check on Ms. Lawson because her home was in the flooded neighborhood of West Summerton. We were heartbroken by the damage to her home and the conditions her and her 6 children were living in, see pictures below. We were even more heartbroken when FEMA determined she had “insufficient damage”. She appealed twice and never got assistance. We partnered with two churches and raised money to get her a new roof and repair her ceilings. She still has more unfinished repairs, but it was a start. Since then, through word of mouth, we have been connected with 10 other households who were denied by FEMA but are living in distressful situations, and need assistance. Nine of these households are in Summerton and one is in the neighboring town of Manning. Gwendolyn Doughty, from Manning, got my phone number from a friend, and called me asking for help. Her mobile home has extensive

damage and is inhabitable; see pictures at the end of this letter. Gwendolyn was given $825.11 for home repairs and $932 for rental assistance. She and her 32 year old disabled son are currently sharing a bed in her sister's home while they wait for someone/some entity to come and help them rebuild. $825 will not repair her mobile home; it needs to be replaced (see pictures at the end of this letter). When she appealed FEMA's decision they gave her an additional $152.69. Gwendolyn has lived in this home since she bought it 22 years ago. She now makes $10,000 a year and cannot afford a new home.

To each person I speak with I explain that I am just an Art teacher who does not have the funds to do their repairs, but that I care about them and their situation and will try to find them some help from somewhere. Once I had seen the devastation, I could not just turn away and do nothing. That search for help eventually led me to this grant and I was shocked to read that Clarendon was not part of the "most impacted and distressed".

HUD used the language: "Most Impacted and Distressed" to describe the nine counties who will receive 80% of the funding. HUD states that they used FEMA data and Small Business Association (SBA) data to calculate unmet housing needs and unmet infrastructure needs. They further explain how they calculated the housing needs based off of the dollar amounts of damage verified by FEMA and the amount of applications for loans through SBA. I will attempt to explain why I believe these sources and methods of analyzing the data are unfairly excluding Clarendon County, and then explain my own data analysis and how that supports moving Clarendon into the 80%.

HUD states that for the purpose of this grant, homes are considered to have serious damage if FEMA determines their damage is $8,000 or greater. This is a problem for Clarendon county because it is a poor county (27% of the county is living in poverty, which is a higher rate of poverty than eight out of the nine counties in the "most impacted and distressed"). Impoverished people do not live in large expensive houses; therefore the dollar amount of their damage would be less than the people living in larger, nicer homes in the wealthier counties. In fact, 54% of the FEMA verified Loss (FVL) in Clarendon County was to mobile homes. That is 1,097 mobile homes with FVL. Mobile homes like Ms. Doughty's. FEMA only gave her $825 for damage+ $125(after she appealed). That does not come close to the $8,000 or greater mark that HUD is using to determine "most impacted". Yet, it is my understanding that storm damage to mobile homes is costly to repair and they most often need to be replaced. According to the SC Disaster Recovery plan it will take $60,000 to replace a mobile home. Additionally, there are people like Ella Johnson, who lives in Summerton and was denied three times by FEMA. They told her that her trailer was too damaged to repair and she needed to push it down, yet they gave "insufficient damage" as the reason they did not give her any funds to help rebuild. Ella Johnson's distress is not showing up in the data used by HUD at all. These examples are taken from the 10 households who I have been connected with through word of mouth, but I surmise there are hundreds more just like them.

HUD also used data from SBA loan applications. The people I am talking about are not applying for loans. Most don't have jobs, or have very low income. Ms. Lawson, whom I mentioned earlier, has a

total balance of only $2,652.00 on her mortgage, but is unable to make the monthly payments of $140.63 because she is unemployed, and they are threatening foreclosure.

Leaving Clarendon in the 20% will leave many citizens still without assistance. Even if the entire 20% of the grant ($19.2M) was spent solely on new mobile homes, which is not realistic to assume, that would only be 320 mobile homes spread across the 13 counties in the 20% ($19.2M divided by $60K = 320 mobile homes). FEMA determined Clarendon has 1,097 mobile homes with damage. This does not include people like Ella Johnson who do have damage, but FEMA determined "insufficient damage".

The poverty in Summerton is poverty that I did not realized existed in America until I moved and taught there for three years. In order to understand the level of need I think a person needs to look at the bigger picture of what "impacted and distressed" really looks like. It would be most obvious through a visit to Summerton. Visit the families in the mobile homes who FEMA determined had "insufficient damage". Try to buy your family healthy food while visiting Summerton- their only grocery store closed months before the flood. Town residents have only two dollar stores and two gas stations to purchase food. Many residents of Summerton were distressed before the storm brought 23.75" inches of rain (the county with the third highest amount of rainfall). The floods heightened their distress. Without visiting the Clarendon County I hope you will see the need to move Clarendon to the 80% by looking at the HUD and Census data from a different perspective:

- HUD has allocated individual grants for Richland and Lexington counties, while additionally including those counties as part of 9 counties (Charleston, Dorchester, Florence, Georgetown, Horry, Lexington, Richland, Sumter, Williamsburg) to receive 80% of the state money. Which leads me to understand HUD views Richland and Lexington as having the greatest need, or being the "most impacted and distressed"
- Richland and Lexington have only 6% and 2%, respectively, of their households with FEMA Verified Loss (FVL). Whereas 16% of Clarendon county has FVL. And, Richland and Lexington have almost double the per capita income of Clarendon.
- 31% of Clarendon County applied for FEMA. Another way of looking at that is: nearly ⅓ of one of the poorest counties in the state has self-declared storm damage. I believe that when considering which Counties are "most impacted and distressed" you cannot ignore percentage of the county impacted.
- Looking at the Social Vulnerability Index (SoVI) map, Clarendon is mostly pink and red(medium high, high), where Lexington, Richland, Dorchester, Horry and Florence are majority grey, teal and some blue (medium, medium-low, low)

When I started looking at FEMA and Census data combined, I realized Orangeburg was also heavily impacted and distressed. So for this next section Clarendon and Orangeburg are compared with all nine of the counties allocated to receive 80% of the state grant:

- Clarendon has the second highest percentage of population with FEMA Verified Loss (FVL) (16%); Orangeburg has the fourth highest FVL (10%).

- Clarendon and Orangeburg have the majority of their FVL to mobile homes. (Clarendon 54%, Orangeburg 53%). All other counties except Williamsburg (51%) have less than 50% of their FVL to mobile homes.
- Clarendon has the highest percentage of disabled people (17%)
- Clarendon has the 3rd highest percentage of people over 65(20.7%) and Orangeburg has the 5th highest (17.7%).
- Clarendon has the lowest percentage of people with a bachelor's degree (13.6%)
- Orangeburg has the highest percent of people living in poverty (30.8%) and Clarendon has the 3rd highest (27%)
- Orangeburg and Clarendon have the 2nd and 3rd highest percentage of minority population. Orangeburg (62% African-American) Clarendon (48% African-American).
- Economically, Clarendon and Orangeburg have much less money coming into the county via income, property and sales tax, than the majority of the other counties. Clarendon has the second lowest amount of retail sales, one way the county has less income. Data on this was not available for Orangeburg.
- Clarendon County is listed in the SC disaster recovery offices PowerPoint for public comment as the county with the third highest amount of rainfall at 23.75"

The only data I analyzed that put Clarendon at the bottom of the list is total number of households with FVL. But they only have 97 households less than Dorchester. And, Dorchester's 2,099 households are only 4% of their county, whereas Clarendon's 2,007 households are 16% of their county. Additionally, Clarendon has more mobile homes with FVL(1,097) than Dorchester(767), Lexington(639), Richland(892), and Georgetown(1,030). I have been told by multiple sources that the majority of mobile homes with damage need to be replaced, because repairing a mobile home is much more costly than repairing stick a built home and the cost of repairs usually outweigh the cost of replacement.

The above data is organized in the attached chart. The information in this chart was taken from census.gov and from the *SC Action Plan for Disaster Recovery*(Draft) and their Power Point.

Thank you for investigating my concerns for the citizens of Clarendon County.

Sincerely,
Patty K Stewart

Response:
Patty K. Stewart
Greenville, SC

Dear Patty K. Stewart,

Thank you for your letter; we value your participation in the CDBG-DR Action Plan public review process.

Let us first commend you for the volunteer service you have provided to fellow South Carolinians in a time of great need. Volunteers such as you are critical in the devastating aftermath of a disaster event of this scale and provide invaluable contribution to the lives and wellbeing of impacted citizens.

The State of South Carolina has created the current Unmet Needs Assessment and Action Plan to address a general program design that targets assistance funding to citizens with the most recovery need as determined by geographic concentration of damage, financial impact, and social vulnerability indicators. The U.S. Department of Housing and Urban Development (HUD) further requires that 80% of the total allocation, or $65,494,200, must address unmet needs within counties designated as "most impacted and distressed." As you know, those current counties are:

Charleston
Dorchester
Florence
Georgetown
Horry
Sumter
Williamsburg
Lexington (not part of SGAOR)[45]
Richland (not part of SGAOR)

We have reviewed the data calculations for Clarendon and Orangeburg County submitted in your letter. This data has been taken under advisement and will be further explored as assistance is rendered to eligible applicants and resources are assessed according to existing need.

The program is currently designed in compliance with National Program objectives, and will make every effort to ensure that assistance is prioritized toward the most disadvantaged populations. In order to assist the most vulnerable populations with this disaster recovery funding, South Carolina intends to prioritize assistance for all housing programs based on the following criteria:

- Individuals who are in the extremely low and very low income brackets;

[45] Lexington and Richland Counties are not part of the State Government Area of Responsibility (SGAOR) for reasons
described in this Action Plan

- Persons with documented disabilities; and
- Age-dependent household members (aged 65 or older, or 5 or below).

South Carolina intends to spend the majority of program funds on activities that benefit the Low-and-Moderate Income population. To this end, application intake will be monitored throughout the program, regularly analyzed to determine consistency with areas of need. Under current design, considering available funding, we anticipate resources will be greatly stretched and areas designated as "most impacted and distressed" will likely fall short of spending targets at an expected 20% of assistance funds.

South Carolina must submit the current Action Plan to HUD by September 21, 2016, in order to obtain grant funding from HUD in accordance with regulatory requirements. The State, however, will remain highly agile throughout the implementation process to ensure program design is consistent with need as identified through public engagement.

Sincerely,

Alan D. Young
Director of Grants Administration
South Carolina Department of Commerce

Comment:

Beth Parks, Program Coordinator
South Carolina Disaster Recovery Office
1205 Pendleton Street
Columbia, SC 29201

Re: Comments on the draft South Carolina Action Plan tor Disaster Recovery

Dear Ms. Parks:

The South Carolina Farm Bureau (SCFB) submits the following comments on the proposed Action Plan for Disaster Recovery as it relates to the October 2015 flooding and the Community Development Block Grant (CDBG) program. SCFB appreciates the opportunity to comment on this issue.

The proposed Action Plan assesses the impact the flooding had on agribusiness at approximately $76 million in estimated loss. The Action plan also notes that it does not include loss estimates for uninsured crops or losses on timber. The Action Plan states that USDA indemnity payments and state aid to farmers result in a "surplus in recovery funds" for agriculture.

We believe the Action Plan's unmet needs assessment for agriculture is inaccurate. According to a study commissioned by Clemson University and the SC Department of Agriculture, South Carolina agriculture experienced an estimated loss of $376 million, using data from USDA, FSA, and SCDA. The Action Plan shows crop insurance payments totaled approximately $55 million. Finally, the South Carolina General Assembly enacted legislation designating $40 million in disaster funds to agriculture. The estimated loss minus the crop insurance payments and the state aid to farmers comes to an approximate total of $281million in remaining unmet agriculture needs.

Total Loss	$375,876,853
Actual Indemnity	$54,982,399
State Aid to Farmers	$40,000,000
Remaining Unmet Agriculture Need	**$280,894,454**

Accordingly, we believe the proposed Action Plan should be revised to reflect the remaining unmet agriculture needs of our state using the data provided by Clemson, which I have attached for your review.

I look forward to working with you as disaster recovery efforts continue. If you have any questions, please do hesitate to contact me.

Sincerely,

Harry Ott, President
SC Farm Bureau

Response:

Dear Mr. Ott,

Thank you for your public comment on the South Carolina Action Plan for Disaster Recovery. Your feedback is critical to the long-term recovery of our state, and your letter will be attached in full to the Action Plan for submittal to the U.S. Department of Housing and Urban Development (HUD).

We are familiar with the Clemson University study referenced in your letter. The study uses a series of data, including preliminary self-reported information, to create estimates of *potential* losses over the long term. The study is centered on corn, cotton, grain sorghum, peanut, and soybean crops. In addition, the production figures used to serve as the basis for the crop insurance amounts are also estimated and do not appear to be based on actual confirmed reports.

The figures utilized in the Action Plan are based on data made available through USDA, for actual indemnity amounts for the counties in the presidential declaration area for October – December 2015 for losses related to Excess Moisture/Precipitation/Rain, Flood, and Inability to Prepare Land. We then used USDA data on levels of insurance coverage to calculate total loss and the resulting unmet need. Using this snapshot, we estimated the unmet need for the affected counties (not the entire state) for those three months right after the floods for covered losses *directly* tied to the floods.

The state believes it is essential to attribute the damage and unmet need amounts to losses directly associated with the federally-declared flood event, and to parse out damages incurred from prior drought and/or pre-disaster rains, other losses incurred in 2015, or damage incurred in counties outside of the scope of the disaster declaration. This is especially important because this federal assistance is statutorily limited in scope to impacts of the October 2015 declared event.

It is of great significance that the South Carolina Farm Aid Grant Program, which came into effect on May 24, 2016, makes $40 million dollars in state funds available to farmers who suffered at least a 40% loss of an affected crop as a result of last October's flooding. We encourage impacted farmers to apply for assistance through that program by calling (803) 734-2210 or going to https://agriculture.sc.gov/sc-farm-aid/ for information on the application process. Rapid mobilization is essential in order to meet the program's August 15, 2016 application deadline.

In summary, that you for contributing to the public comment process, and we look forward to providing housing assistance to eligible farmers in the impacted area.

Sincerely,

Alan D. Young
Director of Grants Administration
South Carolina Department of Commerce

Comment:

Members of the SCDRO

From: Representative/Senator Elect Stephen Goldfinch

Re: Inclusion of Farmers in the CDBG

Members, thank you for taking the time to read my letter and hear my concerns. Regrettably, I was unable to make it in-person tonight, so I hope my letter conveys the importance and sincerity of my message. I implore you to include Georgetown's farmers in the CDBG analysis and eligibility, for three reasons:

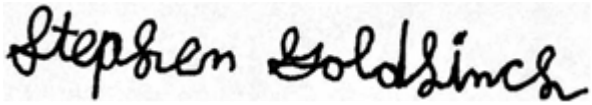
1. Many of these farmers experienced devastating damage to their homes and equipment, in conjunction with the loss of property we have all seen in person or on television.

2. The operating money for emergency farm loans was depleted this year. These loans will be of no use to many of Georgetown's farmers. I may be an idealist, but I truly believe that federal programs designed for emergency relief shouldn't be divided up so significantly, where no one gets relief.

And 3. I understand there may be a push to qualify people for the CDBG based on income. As you likely know, gross income is a non-germane and nonsensical formula to impute upon the farmers. Most farmers spend exorbitant amounts of money, often borrowed, to put seed and fertilizer into the ground, only to have it yield slightly more (hopefully) than what it cost to plant it. A consideration of anything but net income would put farmers at a significant disadvantage that they don't deserve.

In conclusion, I implore you to use these funds to help those among us who were significantly and disproportionately affected by this Thousand Year Event. The power is in your hands to help these folks that provide jobs, economic growth, and food for South Carolina. Let's not let them down.

Sincerely,



Stephen Goldfinch

Response:

Representative Stephen L. Goldfinch, Jr.
P.O. Box 823
Murrells Inlet, SC 29576

Dear Representative Goldfinch,

Thank you for your public comment on the South Carolina Action Plan for Disaster Recovery. Your feedback is critical to the long-term recovery of our state, and your letter will be attached in full to the Action Plan for submittal to the U.S. Department of Housing and Urban Development (HUD).

South Carolina bears commitment to all citizens of the state and remains steadfast in our devotion to service. We understand and appreciate your concern for South Carolina farmers. The state has worked in urgency to relieve the stress felt by our local farmers and thus has designed assistance programs through Federal Emergency Management Agency (FEMA) funded programs, as well as state provided resources.

The State's Disaster Recovery Action Plan outlines the program design for grant funds awarded by HUD. As stewards of this federal assistance, South Carolina bears obligation to fund recovery efforts that directly support the national objectives of HUD and comply with the national objective requirement to allocate no less than 80% of the total grant toward assistance for Low-to-Moderate Income (LMI) households. The use of household income as an indication of this status is the agency's standard and a statutory requirement to obtain Community Development Block Grant-Disaster Recovery (CDBG-DR) funding.

Furthermore, the figures utilized in the Action Plan are based on data made available through USDA for actual indemnity amounts for the counties in the presidential declaration area for October – December 2015 for losses related to Excess Moisture/Precipitation/Rain, Flood, and Inability to Prepare Land. We then used USDA data on levels of insurance coverage to calculate total loss, and the resulting unmet need. Using this snapshot, we estimate the unmet need for the affected counties (not the entire state) for those three months right after the floods for covered losses *directly* tied to the floods.

The state believes it is essential to attribute the damage and unmet need amounts to losses directly associated with the federally-declared flood event, and to parse out damages incurred from prior drought and/or pre-disaster rains, other losses incurred in 2015, or damage incurred in counties outside of the scope of the disaster declaration. This is especially important because this federal assistance is statutorily limited in scope to impacts of the October 2015 declared event.

It is of great significance that the South Carolina Farm Aid Grant Program, which came into effect on May 24, 2016, makes $40 million dollars in state funds available to farmers who suffered at least a 40% loss of an affected crop as a result of last October's flooding. We encourage impacted farmers to apply for

assistance through that program by calling (803) 734-2210 or going to https://agriculture.sc.gov/sc-farm-aid/ for information on the application process. Rapid mobilization is essential in order to meet the program's August 15, 2016 application deadline.

Sincerely,

Alan D. Young
Director of Grants Administration
South Carolina Department of Commerce

Comment:

The Honorable Members of the Horry County Legislative Delegation
John Pedersen, City Manager of Myrtle Beach
Bill Graham, City Administrator of Conway

To Whom It May Concern:

This letter is intended to act as Horry County's official response to the South Carolina Action Plan for Disaster Recovery dated June 23, 2016, as well as request the authority to administer Horry County's portion of the funding allocated by the US Department of Housing and Urban Development (HUD). In general, Horry County supports the South Carolina Disaster Recovery Action Plan, including the effort to prioritize housing through assistance to the most vulnerable households.

Horry County requests that the Action Plan be amended to allow for capable counties to administer CDBG- DR funding locally through a subrecipient agreement. The County's request to administer CDBG-DR funding is in alignment with best disaster recovery practices observed in the state of Louisiana following the devastating hurricanes that affected that state in 2005 and 2008. During Hurricane Katrina, the disaster relief efforts were administered at the state level. After reviewing the effectiveness of that effort, another approach was implemented following Hurricanes Gustav and Ike: providing direct allocations to units of local government through subrecipient agreements. Louisiana determined that it was best to allow the most impacted local governments, acting through subrecipient agreements, to decide on the programs to develop and where to best spend funds to meet their assessed unmet needs. Distribution of funds followed the HUD allocation methodology to grantees from the Federal Register at that time.

Based on this CDBG-DR best practice, and the design and intent of the South Carolina CDBG-DR Action Plan, Horry County requests that the Department of Commerce Disaster Recovery Office consider awarding the County a subrecipient agreement in an amount determined by the methodology of the Federal Register. Horry County is poised to administer CDBG-DR funds for the following reasons:

1. The County effectively and efficiently managed all aspects of the recovery effort in collaboration with federal, state and local agencies;

2. The County's Community Development Department currently manages a robust housing rehabilitation program at nearly $1M per year;

3. The County can leverage resources to ensure all of the needs of Horry County residents are met;

4. The County is mobilized and can act as a subrecipient spending funds quickly and provide an

administrative savings for the State.

Local Experience

As seen in Louisiana, if the capacity and ability are available, local government should be allowed to administer its own disaster recovery efforts. Horry County's Emergency Management Department successfully addressed the flooding (an excess of 20 inches of rain in 48 hours) from Hurricane Joaquin. Since then, the County successfully managed the short-term recovery effort in coordination and cooperation with many partner agencies.

Horry County has the capacity and experience necessary to administer home repairs to meet the needs of the local residents. As a HUD Entitlement Community, Horry County manages CDBG, HOME, and ESG funding and has the requisite experience necessary to administer CDBG-DR funds. Staff regularly conduct beneficiary reviews, fund layering reviews, develops scopes of work, conducts environmental reviews, Housing Quality Standard inspections, oversees construction management, efficient procurement of contractors, and ongoing project monitoring.

The Department has managed a Housing Rehabilitation program since 2008 and completes 25 to 45 housing rehabilitation projects per year. Since the program's inception, the County has rehabilitated over 200 units at an average cost of $36,000 per unit. Attached are the CDBG policies and procedures for implementing the housing program for your review.

Leverage Funding

Horry County is committed to leveraging its existing CDBG Entitlement funds and matching funds (for example: USDA HPG program, Home Depot 360 Grant, and Housing Trust Fund) to ensure that lower income applicants can address both storm damage and deferred maintenance issues. Based on the nature of the damage from the October flood and the condition of the homes prior to the event, Horry County anticipates the cost to rehabilitate the identified homes will exceed the $25,000 threshold indicated within the State Action Plan. Through experience with its own Housing Rehabilitation program, the County anticipates $10,000 to $25,000 deficit per unit.

Additionally, throughout the short term recovery response, local governments, state agencies, not-for-profits and VOAD members expressed a difficulty in sharing beneficiary data. This could become an impediment for projects that lack complete funding due to the identified State CDBG-DR funding thresholds. It could also potentially impact timeliness of spending as required by Federal regulations. Horry County acting as primary intake office could overcome this issue and leverage funds to ensure that Horry County residents return to safe and decent housing quickly.

Mobilization & Cost Savings

The County is prepared to move forward immediately. The County has the ability to mobilize quickly, which could help the State exceed the HUD CDBG-DR timeframes, as well as save administrative expenses by putting funds back into eligible project costs.

Additionally, the County has a housing rehabilitation waiting list of over 150 residents. 10% of which have indicated storm related damages. Residents have also self-identified in the last two weeks seeking access to CDBG-DR funding for storm damages. Community Development is a known commodity in Horry County, especially for its efforts to reach out and be available to residents. Most importantly, residents are aware that Community Development is their first point of contact when seeking assistance.

Lastly, Horry County applauds the state prioritization of funding for housing rehabilitation and believes the program set out in the action plan may be valuable for the non-entitlement communities throughout South Carolina. However, as an experienced entitlement community, Horry County has the knowledge, flexibility and relationships to move forward quickly.

Conclusion

Horry County requests the South Carolina Disaster Recovery Action Plan be amended to allow for it to administer Horry County's portion of the funding allocated by the US Department of Housing and Urban Development (HUD). As a ready and able partner to the State, Horry County is prepared to move forward using its in-house capabilities to help State of South Carolina recover from these devastating floods.

Sincerely,

Chris Eldridge

County Administrator

Response:

Chris Eldridge
Horry County Administrator
P.O. Box 1236
Conway, SC 29528

Dear Mr. Eldridge,

Thank you for your public comment on the South Carolina Action Plan for Disaster Recovery. Your feedback is critical to the long-term recovery of our state, and your letter will be attached in full to the Action Plan for submittal to the U.S. Department of Housing and Urban Development (HUD).

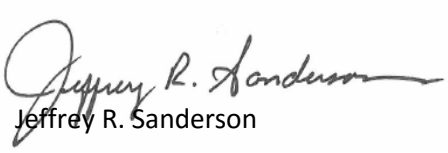
The South Carolina Department of Commerce as overseen by the Governor-appointed Oversight Board has determined a subrecipient model in the State of South Carolina to be cost prohibitive.

During program planning sessions for Action Plan development, South Carolina representatives on the planning committee conducted a review of CDBG-DR program design models considering best practices and precedence set by State Grantees such as Louisiana, Mississippi, Texas and others where the subrecipient model has been implemented. While there are great benefits to this model, South Carolina determined the draw backs the State would face to be prohibitive for the following reasons:

- Replicating the programmatic administrative structure at the subrecipient level creates additional administrative costs reducing the amount of project dollars available for service to beneficiaries.
- Processing time associated with the subrecipient application and approval process could cause further delays for applicants in urgent need of assistance.
- Introducing another layer of program administration could create impediments to the State's primary objective to ensure assistance is prioritized toward the most disadvantaged populations.
- Maintaining consistency of program branding, application, eligibility verification, and regulatory compliance is compounded.

Thank you for contributing to the public comment process.

Sincerely,



Jeffrey R. Sanderson

SC Disaster Recovery Program Manager
South Carolina Department of Commerce

Comment

July 18, 2016

Mr. Daniel Young
Director of Grants and Incentives
South Carolina Department of Commerce
120 I Main Street, Suite 1600
Columbia, SC 29201-3200

Dear Mr. Young:

Thank you for taking the time to listen to the recovery needs of the citizens of Sumter. As noted during the recent HUD Community Development Block Grant-Disaster Recovery (CDBG-DR) Program public comment period, Sumter was hit extremely hard by the October 2015 floods. In fact, Sumter accounted for approximately 20% of the statewide FEMA Individual Assistance (IA) funding and approximately 6% of the eligible FEMA Public Assistance (PA) damage. In addition, 1,383 homes were damaged by the floods, many of which are in lower income areas.

My concern is that Sumter's FEMA PA currently obligated amount of $369, 188 is grossly underestimated and has led state officials to conclude that damage in Sumter was less than in other population centers. I therefore note that FEMA PA staff demobilized before documenting or obligating the City's two largest single Project Worksheets (PWs), Booth Farm and City Storm Drains, which total over $2 million in damage. In addition, with few exceptions, the PWs FEMA did formulate either did not document all identified costs or incorrectly estimated for insurance proceeds. The actual estimated FEMA PA eligible damage within the City of Sumter is over $4 million. In short, the City has identified a large unmet need for recovery project funding in the wake of the October floods.

The City deeply appreciates the $89 million HUD CDBG-DR Housing Repair project that the State will be administering. I understand that Sumter residents will have the same access to repair funds as will all citizens from within the sub-set of hardest hit counties stipulated to receive assistance from the $65,494,200 that HUD requires be spent to address needs in the most impacted South Carolina counties. My concern with the housing program component has more to do with logistics.

First, I hope that there will be a strong local program administration component in Sumter as opposed to a remote call center model. To that end, the City would like to offer resources to assist with identifying eligible Sumter residents and managing their application and implementation process. City staff are well versed on program requirements, regulations, and reporting, know our community thoroughly and are therefore well positioned to play that role.

Second, I understand that in its proposed action plan, the State prioritized housing due to the current limited CDBG-DR funding, thereby leaving nothing at this time for infrastructure projects. Without diminishing the need for housing repair, the City has identified drainage infrastructure projects that

could protect entire at-risk neighborhoods rather than repairing homes within them to be left in harm's way. These identified projects are not eligible for FEMA grant funding. Yet even though HUD, the federal government in general and Sumter all emphasize resiliency as an overarching public policy goal, I am concerned that our priority resiliency projects will go unfunded in the proposed action plan without further CDBG-DR allocations.

Finally, as our State assesses the impacts of the storm and our recovery needs, it daily becomes clearer that the CDBG-DR funds appropriated last year by Congress fall short of addressing our recovery needs and ensuring future resilience. As you may know, states such as Texas, New York, and Colorado received multiple CDBG-DR allocations for a single disaster. I therefore request on behalf of the City that the State actively seek additional CDBG-DR allocations to meet more of the State's unmet needs for non-housing CDBG-DR eligible projects. This would allow Sumter the flexibility to implement effective, make-sense resiliency projects similar to the freedom afforded the initial CDBG-DR direct allocation recipients such as the City of Columbia and Richland and Lexington Counties.

With respect to the aforementioned direct allocation communities, the City of Sumter must again relay its disappointment at not having received its own initial direct allocation. I realize that State officials have no control over this decision, but I do consider it important to reiterate the great lengths to which City officials went to request a direct allocation from HUD. In the end, only Richland County, Lexington County, and the City of Columbia received direct allocations. The City's currently under-obligated FEMA PA totals may have influenced this decision. On the other hand, the final FEMA PA totals in Sumter will be much higher; Sumter has an exemplary record when it comes to managing large federal grants including HUD CDBG; Sumter is focused on resiliency and is in the best position to implement recovery dollars within the City; and Sumter is a HUD entitlement community.

For all of these reasons the City would like to go on record as requesting a direct allocation of HUD CGBG-DR funding as a HUD entitlement community, and as further requesting the State's support in conjunction with a request for additional CDBG-DR allocations to the state.

To these ends, we offer to provide any requested data that may help secure the needed direct allocation funding for make-sense, resilient Sumter managed infrastructure recovery projects.

I thank you in advance for your support and guidance.

Sincerely,

Joseph T. McElveen, Jr.
Mayor

cc: The Honorable Nikki R. Haley
The Honorable Lindsey Graham
The Honorable Tim Scott
The Honorable James Clyburn

The Honorable Mick Mulvaney

Grantee Certifications

Certifications

a. The State of South Carolina 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 State of South Carolina certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

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

d. The State of South Carolina 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 State of South Carolina 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 State of South Carolina 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 UGLG 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 UGLGs in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.

h. The State of South Carolina certifies that it is complying with each of the following criteria:

1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2015 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq.*) related to the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.

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

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

4. The State of South Carolina 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 State certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

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

j. The State of South Carolina certifies that it has adopted and is enforcing the following policies, and, 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 or UGLG 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 State has reviewed the requirements of this notice and requirements of Public Law 114-113 applicable to funds allocated by this notice, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that it has in place proficient financial controls and procurement processes; that it has adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; that it has to maintain a comprehensive disaster recovery Web site to ensure timely communication of application status to applicants for disaster recovery assistance, and that its implementation plan accurately describes its current capacity and how it will address any capacity gaps.

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

m. The State of South Carolina 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 State of South Carolina certifies that it will comply with applicable laws.

[Signed Certifications submitted to HUD]

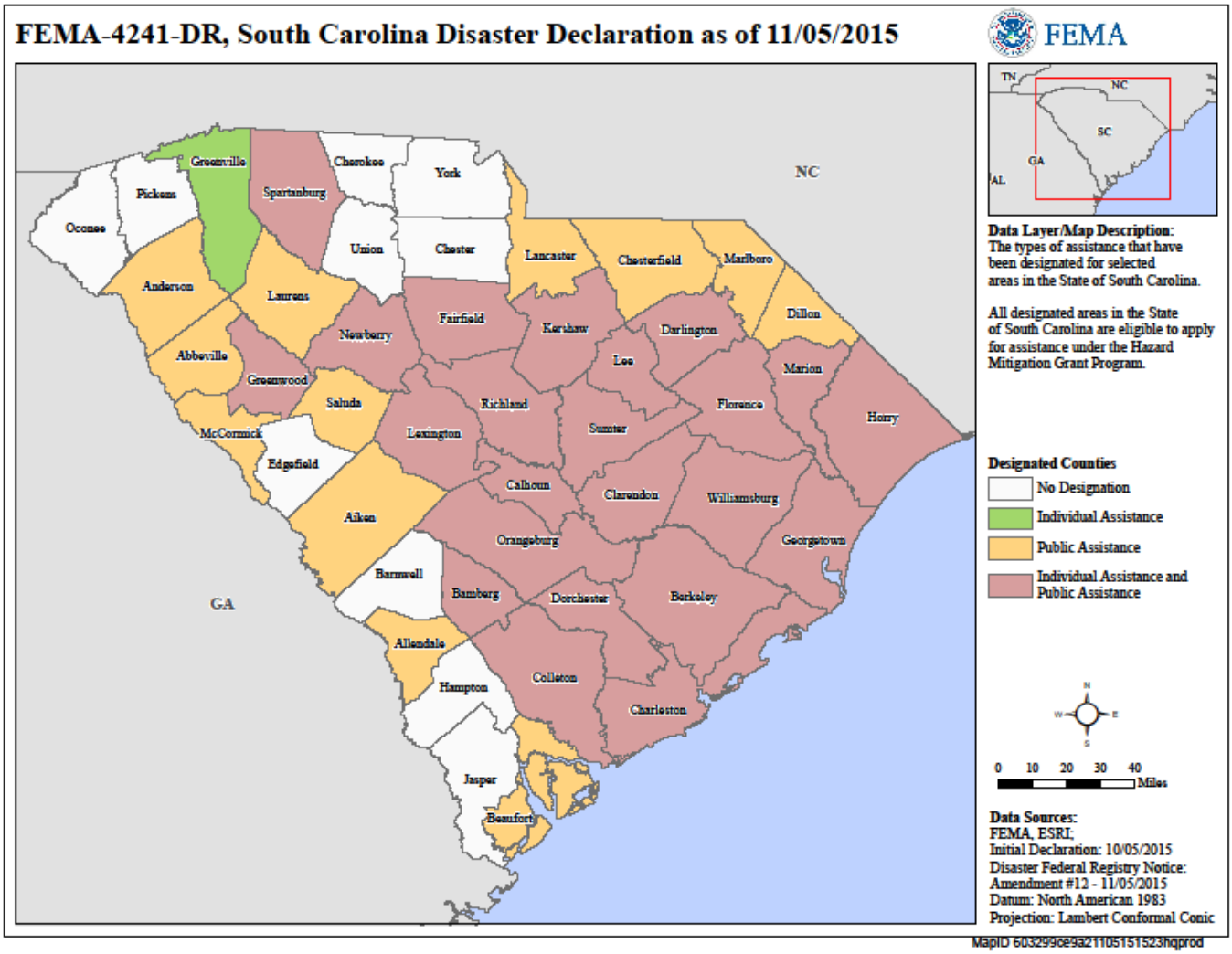
_____ _____

Signature of Authorized Official Date

Daniel Young, South Carolina Disaster Recovery Office, Program Coordinator

Department of Commerce

FEMA – 4241 – Eligible Counties



2016 Area Median Income Limits by Family Size and County

PA Declared County (excluding Richland & Lexington)	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Abbeville								
30% Limits	$11,880	$16,020	$20,160	$24,250	$26,200	$28,150	$30,100	$32,050
50% Limits	$17,000	$19,400	$21,850	$24,250	$26,200	$28,150	$30,100	$32,050
80% Limits	$27,200	$31,050	$34,950	$38,800	$41,950	$45,050	$48,150	$51,250
Aiken								
30% Limits	$12,400	$16,020	$20,160	$24,300	$28,440	$32,580	$36,600	$38,950
50% Limits	$20,650	$23,600	$26,550	$29,500	$31,900	$34,250	$36,600	$38,950
80% Limits	$33,050	$37,800	$42,500	$47,200	$51,000	$54,800	$58,550	$62,350
Allendale								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Anderson								
30% Limits	$11,880	$16,020	$20,160	$24,300	$27,750	$29,800	$31,850	$33,900
50% Limits	$18,000	$20,550	$23,100	$25,650	$27,750	$29,800	$31,850	$33,900
80% Limits	$28,750	$32,850	$36,950	$41,050	$44,350	$47,650	$50,950	$54,200
Bamberg								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Beaufort								
30% Limits	$14,150	$16,150	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$23,500	$26,850	$30,200	$33,550	$36,250	$38,950	$41,650	$44,300
80% Limits	$37,600	$43,000	$48,350	$53,700	$58,000	$62,300	$66,600	$70,900
Berkeley								
30% Limits	$13,900	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$23,100	$26,400	$29,700	$33,000	$35,650	$38,300	$40,950	$43,600
80% Limits	$37,000	$42,250	$47,550	$52,800	$57,050	$61,250	$65,500	$69,700
Calhoun								
30% Limits	$13,500	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$22,450	$25,650	$28,850	$32,050	$34,650	$37,200	$39,750	$42,350
80% Limits	$35,950	$41,050	$46,200	$51,300	$55,450	$59,550	$63,650	$67,750
Charleston								
30% Limits	$13,900	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$23,100	$26,400	$29,700	$33,000	$35,650	$38,300	$40,950	$43,600
80% Limits	$37,000	$42,250	$47,550	$52,800	$57,050	$61,250	$65,500	$69,700
Chesterfield								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Clarendon								

30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Colleton								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Darlington								
30% Limits	$11,880	$16,020	$20,160	$22,550	$24,400	$26,200	$28,000	$29,800
50% Limits	$15,800	$18,050	$20,300	$22,550	$24,400	$26,200	$28,000	$29,800
80% Limits	$25,300	$28,900	$32,500	$36,100	$39,000	$41,900	$44,800	$47,700
Dillon								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Dorchester								
30% Limits	$13,900	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$23,100	$26,400	$29,700	$33,000	$35,650	$38,300	$40,950	$43,600
80% Limits	$37,000	$42,250	$47,550	$52,800	$57,050	$61,250	$65,500	$69,700
Fairfield								
30% Limits	$13,500	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$22,450	$25,650	$28,850	$32,050	$34,650	$37,200	$39,750	$42,350
80% Limits	$35,950	$41,050	$46,200	$51,300	$55,450	$59,550	$63,650	$67,750
Florence								
30% Limits	$11,880	$16,020	$20,160	$24,300	$28,200	$30,300	$32,400	$34,500
50% Limits	$18,300	$20,900	$23,500	$26,100	$28,200	$30,300	$32,400	$34,500
80% Limits	$29,250	$33,400	$37,600	$41,750	$45,100	$48,450	$51,800	$55,150
Georgetown								
30% Limits	$11,880	$16,020	$20,160	$24,300	$28,440	$32,000	$34,200	$36,400
50% Limits	$19,300	$22,050	$24,800	$27,550	$29,800	$32,000	$34,200	$36,400
80% Limits	$30,900	$35,300	$39,700	$44,100	$47,650	$51,200	$54,700	$58,250
Greenville								
30% Limits	$12,800	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,200
50% Limits	$21,350	$24,400	$27,450	$30,450	$32,900	$35,350	$37,800	$40,200
80% Limits	$34,100	$39,000	$43,850	$48,700	$52,600	$56,500	$60,400	$64,300
Greenwood								
30% Limits	$11,880	$16,020	$20,160	$23,600	$25,500	$27,400	$29,300	$31,200
50% Limits	$16,550	$18,900	$21,250	$23,600	$25,500	$27,400	$29,300	$31,200
80% Limits	$26,450	$30,200	$34,000	$37,750	$40,800	$43,800	$46,850	$49,850
Horry								
30% Limits	$11,880	$16,020	$20,160	$24,300	$27,500	$29,550	$31,600	$33,600
50% Limits	$17,850	$20,400	$22,950	$25,450	$27,500	$29,550	$31,600	$33,600
80% Limits	$28,500	$32,600	$36,650	$40,700	$44,000	$47,250	$50,500	$53,750
Kershaw								
30% Limits	$11,880	$16,020	$20,160	$24,300	$28,440	$31,350	$33,500	$35,650
50% Limits	$18,900	$21,600	$24,300	$27,000	$29,200	$31,350	$33,500	$35,650
80% Limits	$30,250	$34,600	$38,900	$43,200	$46,700	$50,150	$53,600	$57,050
Lancaster								
30% Limits	$11,880	$16,020	$20,160	$24,300	$27,650	$29,700	$31,750	$33,800

50% Limits	$17,950	$20,500	$23,050	$25,600	$27,650	$29,700	$31,750	$33,800
80% Limits	$28,700	$32,800	$36,900	$40,950	$44,250	$47,550	$50,800	$54,100
Laurens								
30% Limits	$11,880	$16,020	$20,160	$24,200	$26,150	$28,100	$30,050	$31,950
50% Limits	$16,950	$19,400	$21,800	$24,200	$26,150	$28,100	$30,050	$31,950
80% Limits	$27,100	$31,000	$34,850	$38,700	$41,800	$44,900	$48,000	$51,100
Lee								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Marion								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
McCormick								
30% Limits	$11,880	$16,020	$20,160	$24,300	$26,800	$28,800	$30,800	$32,750
50% Limits	$17,400	$19,850	$22,350	$24,800	$26,800	$28,800	$30,800	$32,750
80% Limits	$27,800	$31,800	$35,750	$39,700	$42,900	$46,100	$49,250	$52,450
Newberry								
30% Limits	$11,880	$16,020	$20,160	$24,300	$28,440	$32,150	$34,350	$36,600
50% Limits	$19,400	$22,200	$24,950	$27,700	$29,950	$32,150	$34,350	$36,600
80% Limits	$31,050	$35,450	$39,900	$44,300	$47,850	$51,400	$54,950	$58,500
Orangeburg								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
Saluda								
30% Limits	$13,500	$16,020	$20,160	$24,300	$28,440	$32,580	$36,730	$40,890
50% Limits	$22,450	$25,650	$28,850	$32,050	$34,650	$37,200	$39,750	$42,350
80% Limits	$35,950	$41,050	$46,200	$51,300	$55,450	$59,550	$63,650	$67,750
Spartanburg								
30% Limits	$11,880	$16,020	$20,160	$24,300	$28,440	$30,700	$32,800	$34,950
50% Limits	$18,550	$21,200	$23,850	$26,450	$28,600	$30,700	$32,800	$34,950
80% Limits	$29,650	$33,850	$38,100	$42,300	$45,700	$49,100	$52,500	$55,850
Sumter								
30% Limits	$11,880	$16,020	$20,160	$24,300	$27,450	$29,500	$31,500	$33,550
50% Limits	$17,800	$20,350	$22,900	$25,400	$27,450	$29,500	$31,500	$33,550
80% Limits	$28,450	$32,500	$36,550	$40,600	$43,850	$47,100	$50,350	$53,600
Williamsburg								
30% Limits	$11,880	$16,020	$20,160	$22,450	$24,250	$26,050	$27,850	$29,650
50% Limits	$15,750	$18,000	$20,250	$22,450	$24,250	$26,050	$27,850	$29,650
80% Limits	$25,150	$28,750	$32,350	$35,900	$38,800	$41,650	$44,550	$47,400
	(1 person)	(2 person)	(3 person)	(4 person)	(5 person	(6 person)	(7 person)	(8 person)

Notices & Public Hearing Dates

The list of all Public Hearings can be found on the following webpage link and seen listed below: http://sccommerce.com/south-carolina-disaster-recovery-assistance

July 5, 2016

Charleston Southern University

Whitfield Center for Christian Leadership

Room 102 & 103

July 6, 2016

Francis Marion University

Cauthen Educational Media Center, Room 114

Florence, SC

July 7, 2016

Alex Chatman Complex Auditorium

147 West Main Street

Kingstree, SC

July 11, 2016

Sumter County Patriot Hall

County Government Office

135 Haynsworth Street

Sumter, SC

July 12, 2016

Howard Recreational Center

1610 Hawkins Street

Georgetown, SC

Appendix: SBA Loans by NAICS Code

For All of South Carolina, Excluding Lexington & Richmond Counties		
NAICS Code	**NAICS Category**	**Total Loan Amount Approved**
112519	Other Animal Aquaculture	$ 10,800.00
113310	Logging	$ 60,000.00
114112	Shellfish Fishing	$ 6,300.00
115210	Support Activities for Animal Production	$ 64,000.00
236118	Residential Remodelers	$ 14,100.00
236220	Commercial and Institutional Building Construction	$ 55,900.00
238110	Poured Concrete Foundation and Structure Contractors	$ 100,000.00
238220	Plumbing, Heating, and Air-Conditioning Contractors	$ 49,700.00
238320	Painting and Wall Covering Contractors	$ 29,800.00
238350	Finish Carpentry Contractors	$ 12,000.00
238910	Site Preparation Contractors	$ 127,800.00
311611	Animal (except Poultry) Slaughtering	$ 42,400.00
311811	Retail Bakeries	$ 24,900.00
326199	All Other Plastics Product Manufacturing	$ 11,300.00
331491	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding, and alloying	$ 4,100.00
339920	Sporting and Athletic Goods Manufacturing	$ 300,000.00
423490	Other Professional Equipment and Supplies Merchant Wholesalers	$ 50,000.00
423520	Coal and Other Mineral and Ore Merchant Wholesalers	$ 175,000.00
424910	Farm Supplies Merchant Wholesalers	$ 148,700.00
441120	Used Car Dealers	$ 230,800.00
441310	Automotive Parts and Accessories Stores	$ 250,000.00
442110	Furniture Stores	$ 111,300.00
442299	All Other Home Furnishings Stores	$ 93,800.00
444130	Hardware Stores	$ 25,000.00
445120	Convenience Stores	$ 404,200.00

445210	Meat Markets	$	18,900.00
445230	Fruit and Vegetable Markets	$	10,000.00
446110	Pharmacies and Drug Stores	$	119,000.00
447110	Gasoline Stations with Convenience Stores	$	161,000.00
448120	Women's Clothing Stores	$	29,000.00
448150	Clothing Accessories Stores	$	15,800.00
448190	Other Clothing Stores	$	18,700.00
451120	Hobby, Toy, and Game Stores	$	16,400.00
451130	Sewing, Needlework, and Piece Goods Stores	$	8,500.00
451140	Musical Instrument and Supplies Stores	$	134,700.00
452990	All Other General Merchandise Stores	$	27,100.00
453220	Gift, Novelty, and Souvenir Stores	$	110,000.00
453920	Art Dealers	$	39,800.00
454390	Other Direct Selling Establishments	$	25,000.00
484110	General Freight Trucking, Local	$	106,900.00
484121	General Freight Trucking, Long Distance, Truckload	$	58,700.00
484210	Used Household and Office Goods Moving	$	93,700.00
484220	Specialized Freight (except Used Goods) Trucking, Local	$	25,000.00
485310	Taxi Service	$	25,000.00
488390	Other Support Activities for Water Transportation	$	16,500.00
488999	All Other Support Activities for Transportation	$	25,000.00
524210	Insurance Agencies and Brokerages	$	10,000.00
531110	Lessors of Residential Buildings and Dwellings	$	5,207,100.00
531120	Lessors of Nonresidential Buildings (except Mini-warehouses)	$	475,700.00
531130	Lessors of Mini-warehouses and Self-Storage Units	$	67,500.00
531311	Residential Property Managers	$	441,100.00
532310	General Rental Centers	$	19,700.00
541110	Offices of Lawyers	$	14,900.00

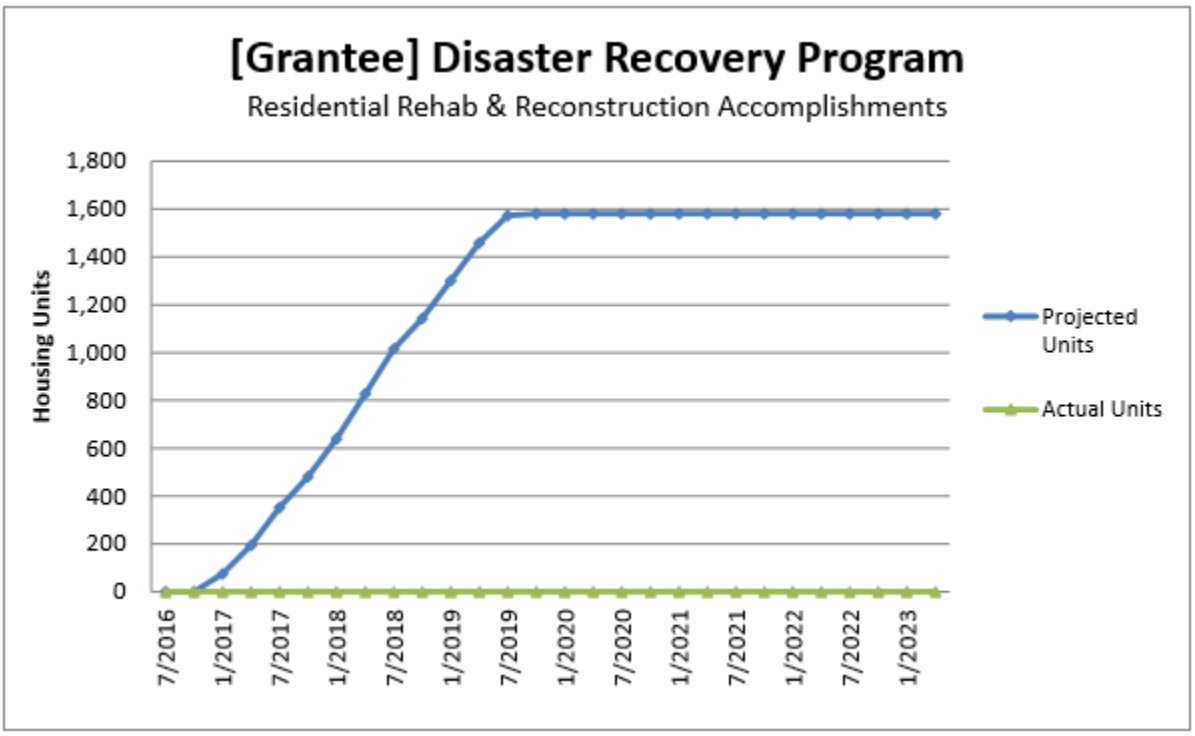
541211	Offices of Certified Public Accountants	$	36,200.00
541213	Tax Preparation Services	$	284,200.00
541219	Other Accounting Services	$	20,000.00
541320	Landscape Architectural Services	$	4,500.00
541410	Interior Design Services	$	7,200.00
541512	Computer Systems Design Services	$	132,000.00
541519	Other Computer Related Services	$	33,700.00
541690	Other Scientific and Technical Consulting Services	$	7,600.00
561730	Landscaping Services	$	66,000.00
561790	Other Services to Buildings and Dwellings	$	34,200.00
562991	Septic Tank and Related Services	$	13,700.00
621111	Offices of Physicians (except Mental Health Specialists)	$	54,300.00
624190	Other Individual and Family Services	$	71,500.00
711120	Dance Companies	$	153,200.00
711211	Sports Teams and Clubs	$	165,000.00
711212	Racetracks	$	25,000.00
712110	Museums	$	23,300.00
713110	Amusement and Theme Parks	$	39,400.00
713910	Golf Courses and Country Clubs	$	642,700.00
713940	Fitness and Recreational Sports Centers	$	45,000.00
713990	All Other Amusement and Recreation Industries	$	15,000.00
721110	Hotels (except Casino Hotels) and Motels	$	202,300.00
722410	Drinking Places (Alcoholic Beverages)	$	153,500.00
722511	Drinking Places (Alcoholic Beverages)	$	203,500.00
722513	Drinking Places (Alcoholic Beverages)	$	157,800.00
722514	Drinking Places (Alcoholic Beverages)	$	9,700.00
722515	Drinking Places (Alcoholic Beverages)	$	8,700.00
811111	General Automotive Repair	$	79,000.00

811121	Automotive Body, Paint, and Interior Repair and Maintenance	$	26,600.00
811212	Computer and Office Machine Repair and Maintenance	$	60,700.00
811310	Commercial and Industrial Machinery and Equipment (except Automotive and El	$	90,100.00
811490	Other Personal and Household Goods Repair and Maintenance	$	59,000.00
812111	Barber Shops	$	60,900.00
812112	Beauty Salons	$	242,400.00
812210	Funeral Homes and Funeral Services	$	6,200.00
812310	Coin-Operated Laundries and Drycleaners	$	9,100.00
812320	Drycleaning and Laundry Services (except Coin-Operated)	$	185,000.00
812990	All Other Personal Services	$	209,800.00
813110	Religious Organizations	$	1,919,700.00
813410	Civic and Social Organizations	$	452,500.00
813990	Other Similar Organizations (except Business, Professional, Labor, and Poli)	$	358,500.00
	Total:	$	16,091,300.00

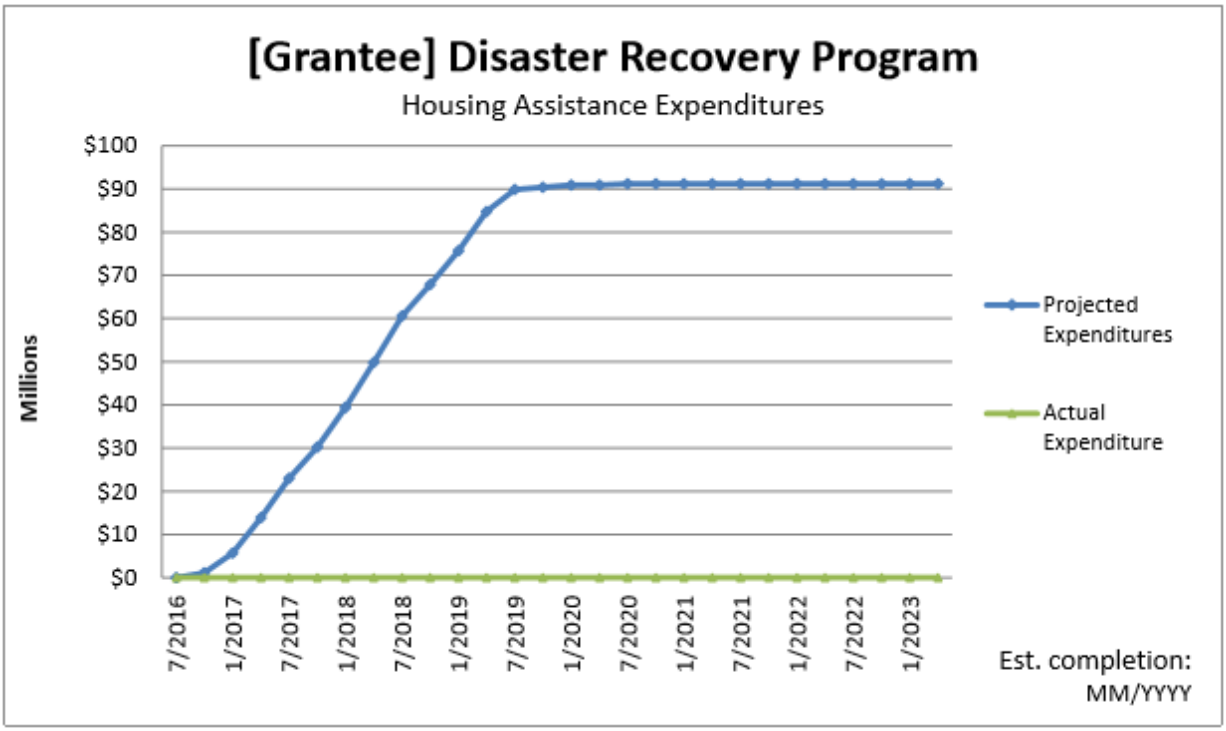
Appendix: Expenditure and Production Timeline Projections

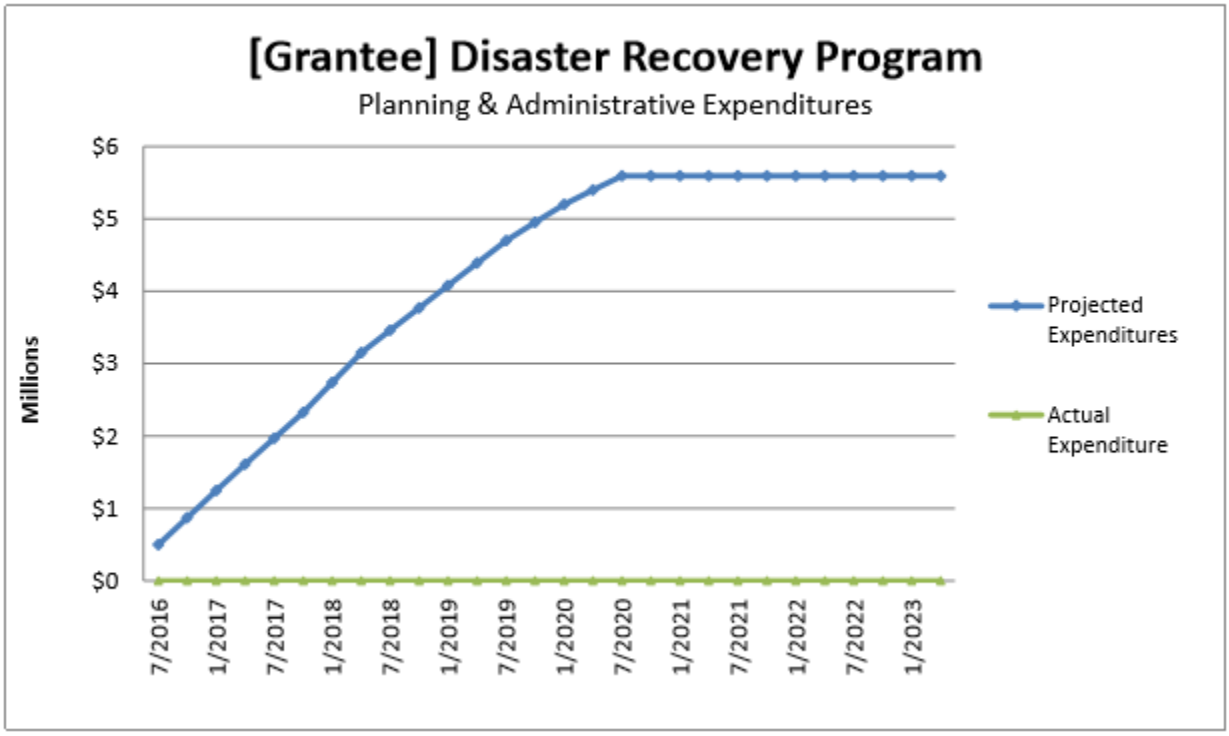
Detailed Projections Spreadsheets to be sent directly to HUD Representative and amended as needed.

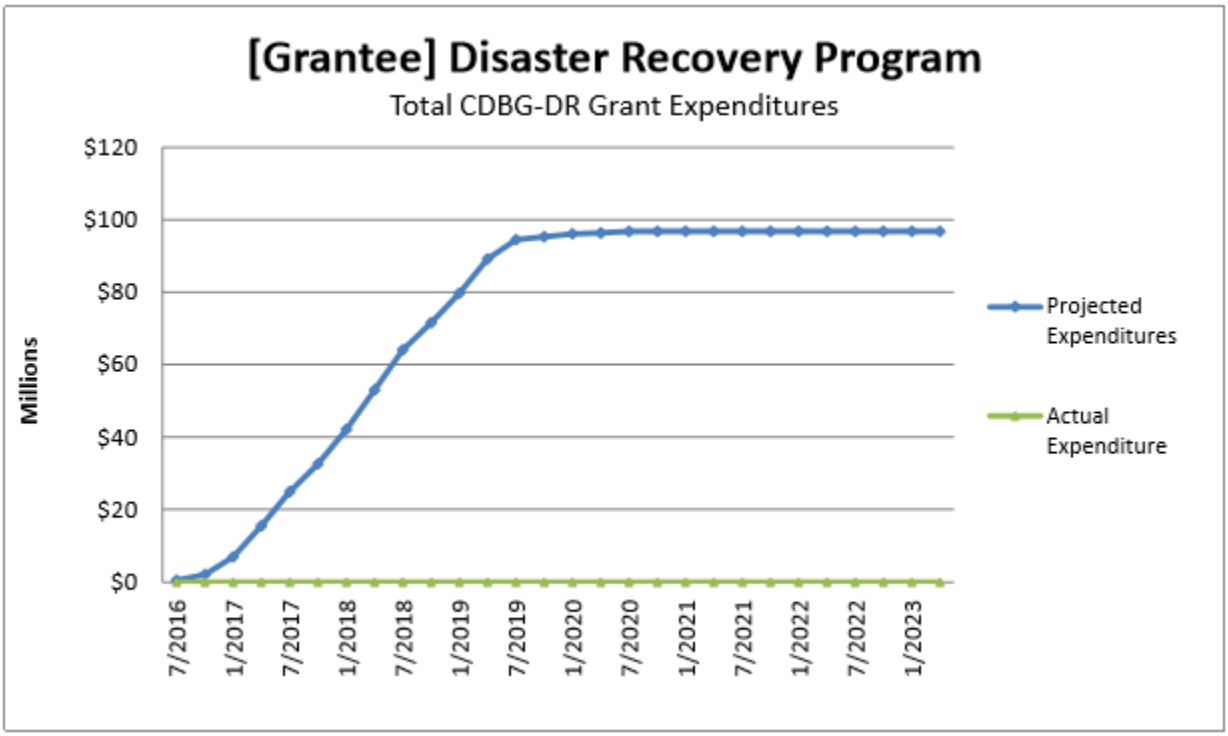
Production Projections



Financial Projections




[Grantee] Disaster Recovery Program
Planning & Administrative Expenditures
Millions
$6
$5
$4
$3
$2
$1
$0
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
7/2019
1/2020
7/2020
1/2021
7/2021
1/2022
7/2022
1/2023
Projected Expenditures
Actual Expenditure


[Grantee] Disaster Recovery Program
Total CDBG-DR Grant Expenditures
Millions
$120
$100
$80
$60
$40
$20
$0
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
7/2019
1/2020
7/2020
1/2021
7/2021
1/2022
7/2022
1/2023
Projected Expenditures
Actual Expenditure

Time							
Cal Year		2016					
Month		J	A	S	O	N	D
State Fiscal Year		2017			2017		
QPR Qtr					QTR 1		
Status					Actual		
Admin/Planning							
$ Admin	5.00%		-		369,439		
$ Plan	0.77%		-		426,505		
Non-Housing							
$ HMGP	0.0%		-		-		
MID-Housing							
% House		0%			0%		
$ Stick	20.4%		-		-		
$ Mob	27.2%		-		-		
$ Mod	3.4%		-		-		
Relocation	0.1%		-		-		
NMID-Housing							
% House		0%			0%		
$ Stick	9.6%		-		-		
$ Mob	12.8%		-		-		
$ Mod	1.6%		-		-		
Relocation	0.0%		-		-		
$ Rental - Mid	0.70%		-		-		
$ Rental - NonMid	0.33%		-		-		
Delivery Cost							
%		0%			11%		
$ Contr	18.0%		-		1,889,256		
%Expended	100%	0%			2.8%		
$ TOTAL Qtr			-		2,685,200		
$ Grant to Date			-		2,685,200		

Cal Year		2017											
Month		J	F	M	A	M	J	J	A	S	O	N	D
State Fiscal Year		2017			2017			2018			2018		
QPR Qtr		QTR 2			QTR 3			QTR 4			QTR 5		
Status		Projected			Projected			Projected			Projected		
Admin/Planning													
$ Admin	5.00%	370,000			370,000			350,000			350,000		
$ Plan	0.77%	10,000			10,000			10,000			10,000		
Non-Housing													
$ HMGP	0.0%	-			-								
MID-Housing													
% House		2%			7%			7%			7%		
$ Stick	20.4%	408,000			1,383,000			1,383,000			1,383,000		
$ Mob	27.2%	544,000			1,844,000			1,844,000			1,844,000		
$ Mod	3.4%	68,000			230,000			230,000			230,000		
Relocation	0.1%	-			8,000			8,000			8,000		
NMID-Housing													
% House		1%			3%			3%			3%		
$ Stick	9.6%	193,000			655,000			655,000			655,000		
$ Mob	12.8%	256,000			868,000			868,000			868,000		
$ Mod	1.6%	32,000			108,000			108,000			108,000		
Relocation	0.0%	-			4,000			4,000			4,000		
$ Rental - Mid	0.70%	-			-			75,000			100,000		
$ Rental - NonMid	0.33%	-			-			25,000			50,000		
Delivery Cost													
%		6%			10%			7%			7%		
$ Contr	18.0%	1,048,000			1,746,000			1,222,000			1,222,000		
%Expended	100%	5.8%			13.3%			20.3%			27.3%		
$ TOTAL Qtr		2,929,000			7,226,000			6,782,000			6,832,000		
$ Grant to Date		5,614,200			12,840,200			19,622,200			26,454,200		

Time													
Cal Year		2018											
Month		J	F	M	A	M	J	J	A	S	O	N	D
State Fiscal Year		2018			2018			2019			2019		
QPR Qtr		QTR 6			QTR 7			QTR 8			QTR 9		
Status		Projected			Projected			Projected			Projected		
Admin/Planning													
$ Admin	5.00%	350,000			350,000			350,000			350,000		
$ Plan	0.77%	10,000			10,000			10,000			10,000		
Non-Housing													
$ HMGP	0.0%												
MID-Housing													
% House		7%			7%			8%			8%		
$ Stick	20.4%	1,383,000			1,383,000			1,580,000			1,580,000		
$ Mob	27.2%	1,844,000			1,844,000			2,107,000			2,107,000		
$ Mod	3.4%	230,000			230,000			263,000			263,000		
Relocation	0.1%	8,000			8,000			8,000			8,000		
NMID-Housing													
% House		3%			3%			4%			4%		
$ Stick	9.6%	655,000			655,000			748,000			748,000		
$ Mob	12.8%	868,000			868,000			992,000			992,000		
$ Mod	1.6%	108,000			108,000			124,000			124,000		
Relocation	0.0%	4,000			4,000			4,000			4,000		
$ Rental - Mid	0.70%	100,000			75,000			75,000			75,000		
$ Rental - NonMid	0.33%	50,000			50,000			25,000			25,000		
Delivery Cost													
%		2%			7%			10%			9%		
$ Contr	18.0%	349,000			1,222,000			1,746,000			1,571,000		
%Expended	100%	33.5%			40.5%			48.8%			56.9%		
$ TOTAL Qtr		5,959,000			6,807,000			8,032,000			7,857,000		
$ Grant to Date		32,413,200			39,220,200			47,252,200			55,109,200		

Time													
Cal Year		2019											
Month		J	F	M	A	M	J	J	A	S	O	N	D
State Fiscal Year		2019			2019			2020			2020		
QPR Qtr		QTR 10			QTR 11			QTR 12			QTR 13		
Status		Projected			Projected			Projected			Projected		
Admin/Planning													
$ Admin	5.00%	350,000			350,000			300,000			250,000		
$ Plan	0.77%	10,000			10,000			10,000			-		
Non-Housing													
$ HMGP	0.0%												
MID-Housing													
% House		7%			4%			3%			0%		
$ Stick	20.4%	1,383,000			790,000			675,650			6,421,350		
$ Mob	27.2%	1,844,000			1,053,000			897,000			8,565,000		
$ Mod	3.4%	230,000			132,000			110,000			1,076,000		
Relocation	0.1%	6,000			6,000			-			-		
NMID-Housing													
% House		4%			2%			2%			0%		
$ Stick	9.6%	655,000			374,000			321,650			3,036,000		
$ Mob	12.8%	868,000			496,000			423,000			4,027,000		
$ Mod	1.6%	108,000			62,000			51,000			508,000		
Relocation	0.0%	4,000			-			-			-		
$ Rental - Mid	0.70%	75,000			105,000			-			-		
$ Rental - NonMid	0.33%	25,000			70,000			-			-		
Delivery Cost													
%		8%			0%			5%			11%		
$ Contr	18.0%	1,397,000			-			873,000			1,921,000		
%Expended	100%	64.1%			67.7%			71.4%			98.1%		
$ TOTAL Qtr		6,955,000			3,448,000			3,661,300			25,804,350		
$ Grant to Date		62,064,200			65,512,200			69,173,500			94,977,850		

Time											
Cal Year		2020									
Month		J	F	M	A	M	J	J	A	S	
State Fiscal Year		2020			2020			2021			
QPR Qtr		QTR 14			QTR 15			QTR 16			Total
Status		Projected			Projected			Projected			
Admin/Planning											
$ Admin	5.00%	200,000			181,911			-			4,841,350
$ Plan	0.77%	-			213,495			-			750,000
Non-Housing											
$ HMGP	0.0%	-			-			-			-
MID-Housing											
% House		0%			0%			Remainder			67%
$ Stick	20.4%	-			-						19,753,000
$ Mob	27.2%	-			-						26,337,000
$ Mod	3.4%	-			-						3,292,000
Relocation	0.1%	-			-			-			68,000
NMID-Housing											
% House		0%			0%			Remainder			32%
$ Stick	9.6%	-			-						9,350,650
$ Mob	12.8%	-			-						12,394,000
$ Mod	1.6%	-			-						1,549,000
Relocation	0.0%	-			-			-			32,000
$ Rental - Mid	0.70%	-			-			-			680,000
$ Rental - NonMid	0.33%	-			-			-			320,000
Delivery Cost											
%		1%			4%			2%			100%
$ Contr	18.0%	175,000			698,000			380,744			17,460,000
%Expended	100%	98.5%			99.6%			100.0%			100%
$ TOTAL Qtr		375,000			1,093,406			380,744			96,827,000
$ Grant to Date		95,352,850			96,446,256			96,827,000			

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Key Program Terms

SCDRO: The SCDRO represents the "South Carolina Disaster Recovery Office," and is the State office in charge of the Disaster Recovery Program. SCDRO falls under the SC Department of Commerce.

SGAOR: The SGAOR represents the "State Government Area of Responsibility," which consists of 22 of the 24 counties deemed eligible for Individual Assistance, not including Richland and Lexington counties.

PA: PA stands for FEMA Public Assistance. In South Carolina, 35 counties are eligible for Public Assistance.

IA: IA stands for FEMA Individual Assistance. In South Carolina, 24 counties are eligible for Public Assistance. Of these, 22 fall in to the SGAOR.

Low-Income: The Low-Income category describes applicants with household income levels between 51% and 80% of the Area Median Income level.

Very Low-Income: The Very Low-Income category describes applicants with household income levels between 31% and 50% of the Area Median Income level.

Extremely Low-Income: The Extremely Low-Income category describes applicants with household income levels between 0% and 30% of the Area Median Income level.

Age Dependent: Age Dependent refers to applicants with household members either 65 or over, or 5 years old or younger.

AFN: AFN refers to applicants with household member(s) that identify as needing assistance for functional needs.

MHU: MHU stands for Manufactured Home Unit, or commonly referred to as a Mobile Home.

U.S. Citizenship or Lawful Permanent residence: Refers to CBDG-DR Fund eligible individuals. In determining eligibility for benefits, SC will comply with the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 ("PRWORA"); Attorney General Order No. 2353-2001, F.R. Doc. No.: 01-1158; and the guidance provided in the August 5, 2016 joint letter from US Attorney General Lynch, HHS Secretary Burwell, and HUD Secretary Castro. PRWORA provides that with certain exceptions, only US citizens and eligible noncitizens are eligible for federal, state, and local benefits.

The list of those eligible for benefits is similar to those in Section 214, with some slight exceptions:

- ***US Citizens or Nationals***
- ***Lawful Permanent Residents ("Green Card" holders)***
- ***Refugees and Asylees***
- ***An alien paroled into US for a period of more than one year***
- ***All aliens with deferred deportation***

- ***Cuban/ Haitian Entrants***
- ***Battered immigrants where battery causes the need for the benefit.***

Note: If a potential SCDRO disaster relief recipient is not a citizen or eligible non-citizen, SCDRO will refer that person to the VOADs for possible assistance.

Recipients: As defined in 24 CFR 8.3(c) "Any State or its political subdivision, any instrumentality of a State or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended for any program or activity directly or through another recipient, including any successor, assignee, or transferee of a recipient, but excluding the ultimate beneficiary of the assistance. An entity or person receiving housing assistance payments from a recipient on behalf of eligible families under a housing assistance payments program or a voucher program is not a recipient or sub-recipient merely by virtue of receipt of such payments." (24 CFR 8.3(c) under Qualified individual with handicaps)