

SOUTH CAROLINA HURRICANE FLORENCE ACTION PLAN



Amendment 4

South Carolina Office of Resilience

Effective

Posted Date:
10-24-2022

Amendment 4 (10-24-2022)

Section	Previous Page	New Page	Change
Program Budget	78	78	Increased the amount of Single-Family Housing Program from \$56,000,000 to \$63,000,000. Decreased the amount of the Buyout Program from \$10,000,000 to \$3,000,000.

This is a substantial amendment in accordance with the Action Plan which states that an allocation or re-allocation of \$5,000,000 or more is a substantial amendment. This amendment was posted for public comment on 10/24/2022.

Amendment 3 (6-22-2022)

Section	Previous Page	New Page	Change
Maximum Assistance Amount	89	89	Added the Market Adjustment Incentive to the Buyout Program.

After conferring with HUD, it was determined that Amendment 3 does not meet the criteria for a substantial Amendment. The Amendment has an effective date of 6-28-2022.

Amendment 2 (2-15-2022)

Section	Previous Page	New Page	Change
Basis for Calculating Housing Assistance	83	83	Modified Award caps to reflect program approved pricing.

After conferring with HUD, it was determined that Amendment 2 does not meet the criteria for a substantial Amendment because the overall benefit to the applicant is not changed, just the base cost for the Mobile Home Unit. The Amendment has an effective date of 2-21-2022.

Amendment 1 (6-7-2021)

Section	Previous Page	New Page	Change
Basis for Calculating Housing Assistance	83	83	Modified Award caps to reflect program approved pricing.

The South Carolina Office of Resilience accepted public comment on the Hurricane Florence Action Plan Amendment 1 until June 22, 2021. Comments could be submitted via email (ContactSCDR@scor.sc.gov) or in writing (632 Rosewood Drive, Columbia, SC 29201). No comments were received.

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Introduction

In September 2018, South Carolina was impacted by hurricane storm surge, high winds, tornados and flash flooding from Hurricane Florence as it made landfall near Wrightsville Beach, North Carolina Sept. 14, 2018 as a Category 1 hurricane. After landfall, Florence stalled briefly and then began a slow southwestward track over South Carolina as it weakened to a tropical storm, bringing tropical storm force wind gusts and heavy rains to eastern parts of the state. Fortunately, South Carolina was well prepared for a massive hurricane evacuation, and most people were able to get out of harm's way. Four deaths were attributed to Hurricane Florence in South Carolina. Although many lives were spared because of proper planning and execution of hurricane plans, the state still saw significant flooding, winds, and coastal storm surges which caused damage to infrastructure, homes, and businesses.

Hurricane Florence's impacts to South Carolina occurred mostly east of Interstate 95 and north of Interstate 26. Though a paucity of river gauges exists in the inland areas of this region, more than 20 inches of rain inundated parts of Horry and Chesterfield Counties, with the city of Loris recording more than 23 inches of rain.¹ These counties also experienced Category 1 hurricane-force wind gusts and several tornados that caused extensive tree and roof damages.² The greatest storm tide measurements for Hurricane Florence in South Carolina topped 6 feet in parts of Georgetown County, with NOAA coastal tide gages and USGS storm tide sensors measuring an average storm surge of 2 to 4 feet north of Charleston to the North Carolina border.³ Though widespread coastal erosion was not observed, parts of Georgetown and Horry Counties experienced impacts and property damages from coastal flooding and erosion at Pawleys Island northward through Myrtle Beach.⁴ Horry County also experienced significant flooding and related agricultural losses, initially estimated at more than \$125 million and more than 30 percent of soy bean, cotton and peanut crop losses.⁵ Furthermore, the USDA Food and Nutrition Service granted food loss and SNAP benefit waivers to the more than 185,000 impacted households that faced power outages, flooding and other obstacles in 26 counties during September and October 2018.⁶ 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.

As the State continues recovery efforts, a focus on restoring residents' homes to safe, sanitary and secure conditions consistent with program housing quality standards will be key. In Florence's wake, as in past disasters, South Carolinians continue the tradition of leading assistance to each. In the true Southern spirit of "neighbors helping neighbors," many of the most vulnerable and heavily impacted received help from friends, and there has been an outpouring of assistance for the elderly, disabled, or those families in

¹ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf

² <https://www.weather.gov/ilm/HurricaneFlorence>

³ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf

⁴ <https://www.usgs.gov/centers/spcm/science/hurricane-florence-forecast-and-documentation-coastal-change>

⁵ <https://www.scmd.org/news/gov-henry-mcmaster-requests-federal-disaster-declaration-in-advance-of-hurricane-florences-potential-impact-to-the-state/>

⁶ <https://www.usda.gov/media/press-releases/2018/09/20/usda-eases-program-rules-south-carolina-snap-participants-impacted>

greatest need. The State, local county authorities, and non-profits continue supporting individuals, through the One SC Fund, local governments, and volunteer organizations continue supporting individuals and families who require basic services and are working 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

Since 2001, Congress has occasioned the appropriation of Community Development Block Grant Disaster Recovery (CDBG-DR) funding around Presidential Disaster Declarations (PDD). In 2016, a Consolidated Appropriations Act (Public Law [PL] 114-113, approved Dec. 18, 2015) was enacted to appropriate federal funds for disaster relief. PL 114-113 provided monies to states or units of general local government (UGLGs) for disaster recovery efforts in areas affected by disaster in 2015 as evidenced by a PDD. Subsequently, Congress passed PL 114-254 and appropriated funds for recovery efforts for disasters occurring in 2016, which was then supplemented by PL 115-31. For disasters occurring in 2018, Congress allocated funds under PL 115-254 and PL 116-20. Generally, these funds are to be used to satisfy a portion of unmet needs that remain after other federal assistance such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA) or private insurance has been allocated.

The U.S. 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 these assessments, HUD notified the State of South Carolina that it will receive disaster recovery fund allocations noted in Table 1 to assist in recovery from 2015, 2016, and 2018 disaster events.**

Table 1. CDBG-DR funding announcements for 2015-2018 disasters affecting South Carolina.

Disaster Year (Name)	Grantee	PL 114-113 81 FR 39687	PL 114-254 82 FR 5591	PL 115-31 82 FR 36812	PL 115-254 PL 116-20 85 FR 4681
2015 (Joaquin)	Lexington County, SC	\$16,332,000		\$5,038,000	
	Columbia, SC	\$19,989,000		\$6,166,000	
	Richland County, SC	\$23,516,000		\$7,254,000	
	State of South Carolina	\$96,827,000		\$29,871,000	
2016 (Matthew)	State of South Carolina		\$65,305,000	\$29,781,000	
2018 (Florence)	State of South Carolina				\$72,075,000

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. Notably, the 2019 Appropriations Act permits the interchangeable use of funds between mitigation and recovery activities to include prior acts that include the 2015 floods from Joaquin and Hurricane Matthew in 2016 under Public Laws 114-223, 114-254, and 115-31 as noted in Table 1. In order to ensure that the funds assist the most impacted areas, 80 percent of the combined total awarded to the State will go to the most impacted and distressed counties. As a grantee, the State of South Carolina may determine

where to expend the remaining 20 percent of the allocation, but the funds must be spent toward unmet needs in counties with a presidentially declared disaster. More generally, all the allocated funds must be used for eligible disaster-related activities. To ensure that fraud, waste and misuse of funds does not occur, effective controls must be in place and monitored for compliance.

As required by HUD, South Carolina submits this Action Plan to outline its unmet needs to develop the most impactful recovery program for the state. The Unmet Needs Assessment, which evaluates the three core aspects of recovery – housing, infrastructure and economic development, forms the basis for the decisions outlined in the Action Plan. This Unmet Needs Assessment was developed with the help of many state and local stakeholders as well as the public to target the most significant unmet need that can be addressed by these limited federal funds.

Community Profile: Summary of Impact and Presidentially Declared Counties

Hurricane Florence (Figure 1) was a triple threat in that it impacted South Carolinians with storm surges of 2 to 4 feet in some areas, damaging winds (Figure 2) across nearly the whole presidentially declared impact areas, and heavy rainfall (Figure 3) that caused widespread flooding. In some places these three hazards created a compound threat damaging homes and infrastructure.

More than 16,837 residents applied for Individual Assistance from FEMA, more than 8,000 residences had a real property FEMA Verified Property Loss as a result of this event, and more than 4,438 residents received Housing Assistance from FEMA.⁷ While damage from Hurricane Florence flooding is fairly easy to identify, there were many homes damaged by the combination of wind and rainfall. This 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 saw high amounts of rainfall with several areas receiving more than 20 inches of rain in a 24-hour period. Figure 3, below, created by the Charleston Office of the National Weather Service, illustrates the extent and severity of the hurricane event and associated rainfall amounts. Inland areas rather than the immediate coastline that saw the largest amounts of rain and related flood damages. Due to the stalling and slow movement of Hurricane Florence over the eastern half of South Carolina, heavy rainfall from the mountains to the lowlands caused significant flooding. The four direct fatalities occurring as a result of Florence were caused by vehicular drowning incidents, and another five deaths were indirectly related to carbon monoxide poisoning and auto accidents. In Loris, where more than 23 inches of rain was observed, more than 100 people were rescued from flooded homes and cars, with more than 1,000 homes and businesses flooded in nearby Conway. More than 150 homes recently rebuilt after Hurricane Matthew in 2016 were severely flooded in Marlboro County, and flooding along the Lynches River in Florence County resulted in the evacuation of more than 2,500 residents.

The peak storm tide in South Carolina was 6.03 feet at Murrells Inlet in Georgetown County, corresponding with an estimated peak storm surge inundation of about 3.8 feet, as measured by the USGS and reported in the National Hurricane Center's Tropical Cyclone Report for Florence.⁸ Horry County's Surfside Beach had the second highest storm tide measurement of 5.55 feet and storm surge of 3.1 feet. Surveys and measurements obtained from the NOAA National Hurricane Center and U.S. Geological Survey indicate inundation (i.e., water depths above ground) was generally about 2-4 feet in most areas with locally higher amounts up to 3 to 4 feet, mainly in Georgetown and Horry Counties. Wind-derived damage was experienced mostly across the northeastern areas of South Carolina, causing power outages affecting farmers and combining with rainfall to produce heavy impacts in many places. These winds coupled with rainfall were enough to cause significant damage to homes and businesses.

⁷ FEMA FIDA – Individual Assistance Program Report

⁹ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf

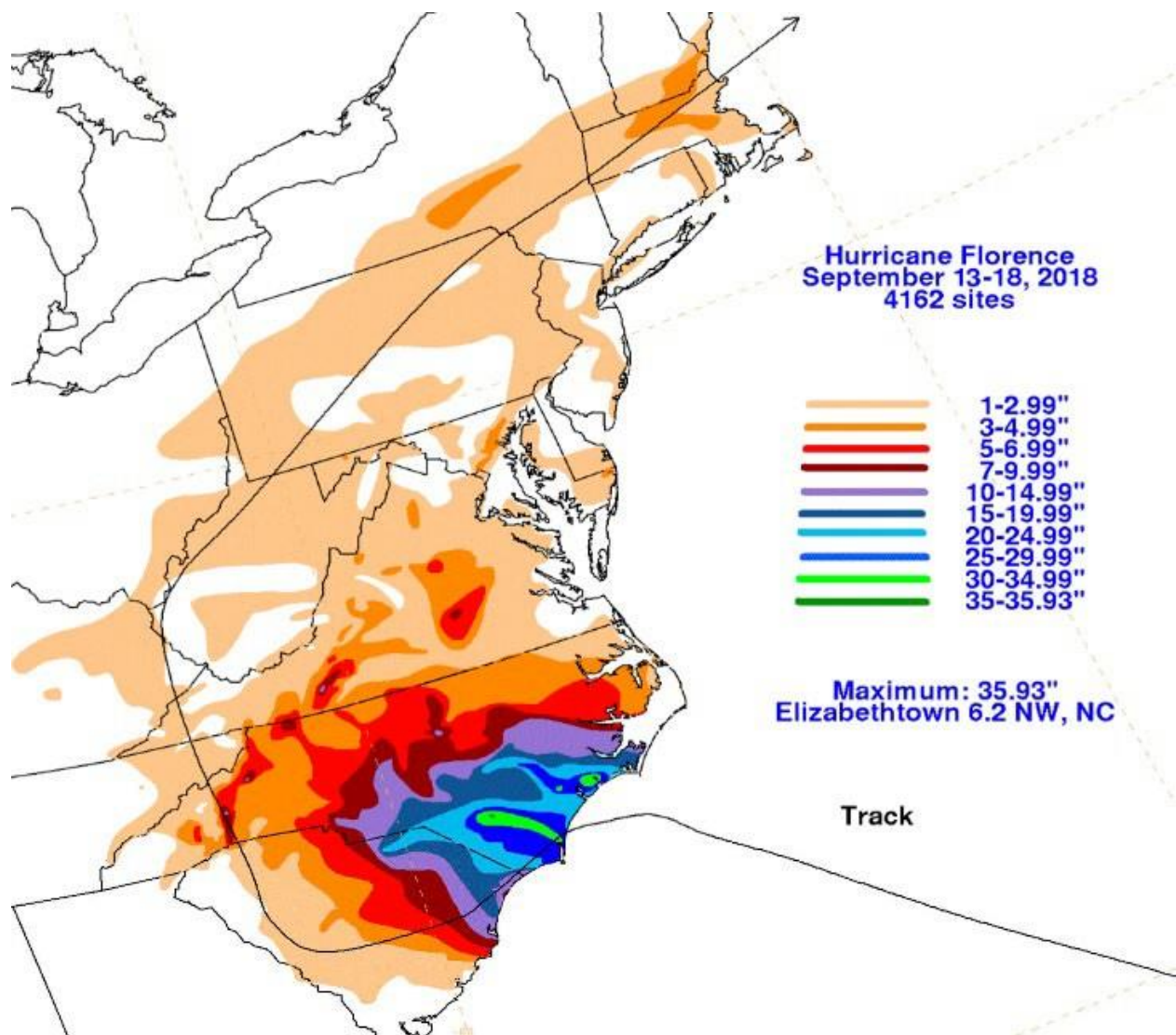


Figure 1: Hurricane Florence path and associated rainfall areas.⁹

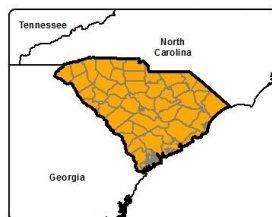
¹⁰ https://www.nhc.noaa.gov/data/tcr/AL062018_Florence.pdf



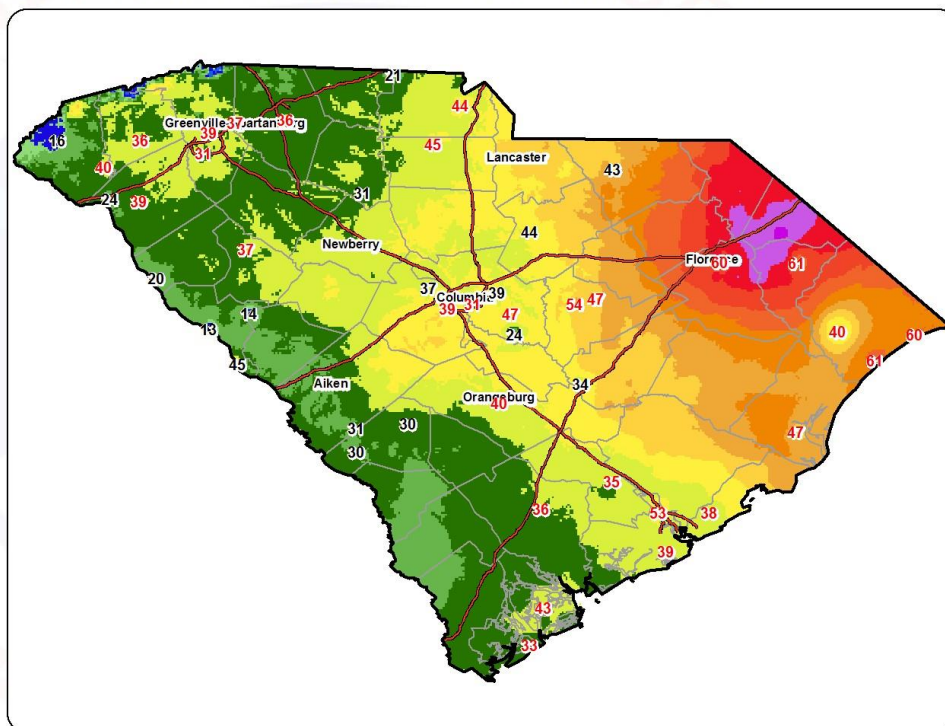
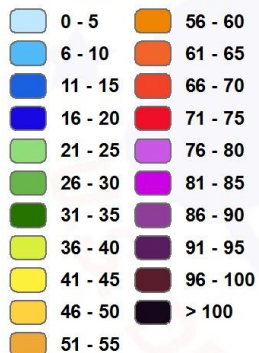
National Weather Service State of South Carolina



Maximum Max Wind Gust 8AM 09/13/2018 - 8AM 09/17/2018



Max Wind Gust (MPH)



This map is an interpolation of actual reported values, but should be considered an estimation only. Not all reports used in the analysis will be displayed due to space constraints. Reports are max wind gust through the above mentioned period.



Figure 2: Hurricane Florence peak wind gusts.¹⁰

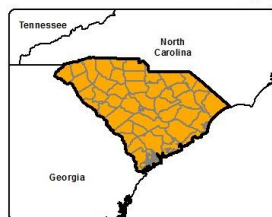
¹¹ <https://www.weather.gov/chs/TropicalStormFlorence-Sept2018>



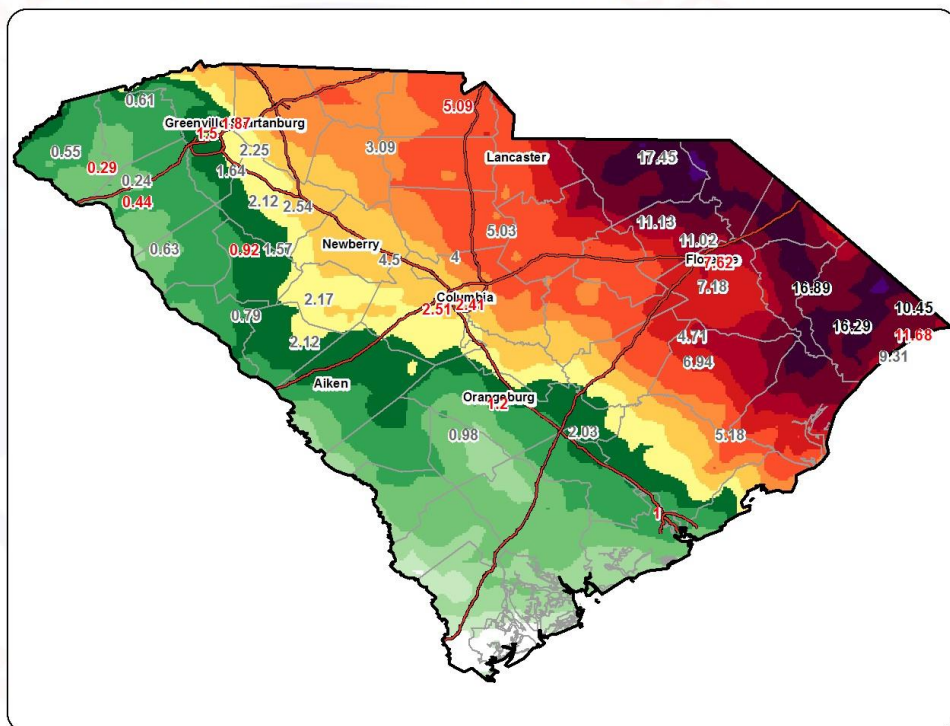
National Weather Service State of South Carolina



Precipitation Accumulation 8AM 09/13/2018 - 8AM 09/17/2018



Precipitation (in)



This map is an interpolation of actual reported values, but should be considered an estimation only. Not all reports used in the analysis will be displayed due to space constraints. Reports are precipitation through the above mentioned period.

Data Sources: NWS COOP ASOS/AWOS Mesonet
CoCoRaHS Miscellaneous
0 12.5 25 50 75 100 Miles

Figure 3: Hurricane Florence rainfall totals.¹¹

¹² <https://www.weather.gov/chs/TropicalStormFlorence-Sept2018>

A major disaster declaration was issued for the State of South Carolina on Sept. 16, 2018. The declaration for FEMA 4394 included the following counties:**Error! Reference source not found.**

Table 2. Declared County List for PDD 4394.

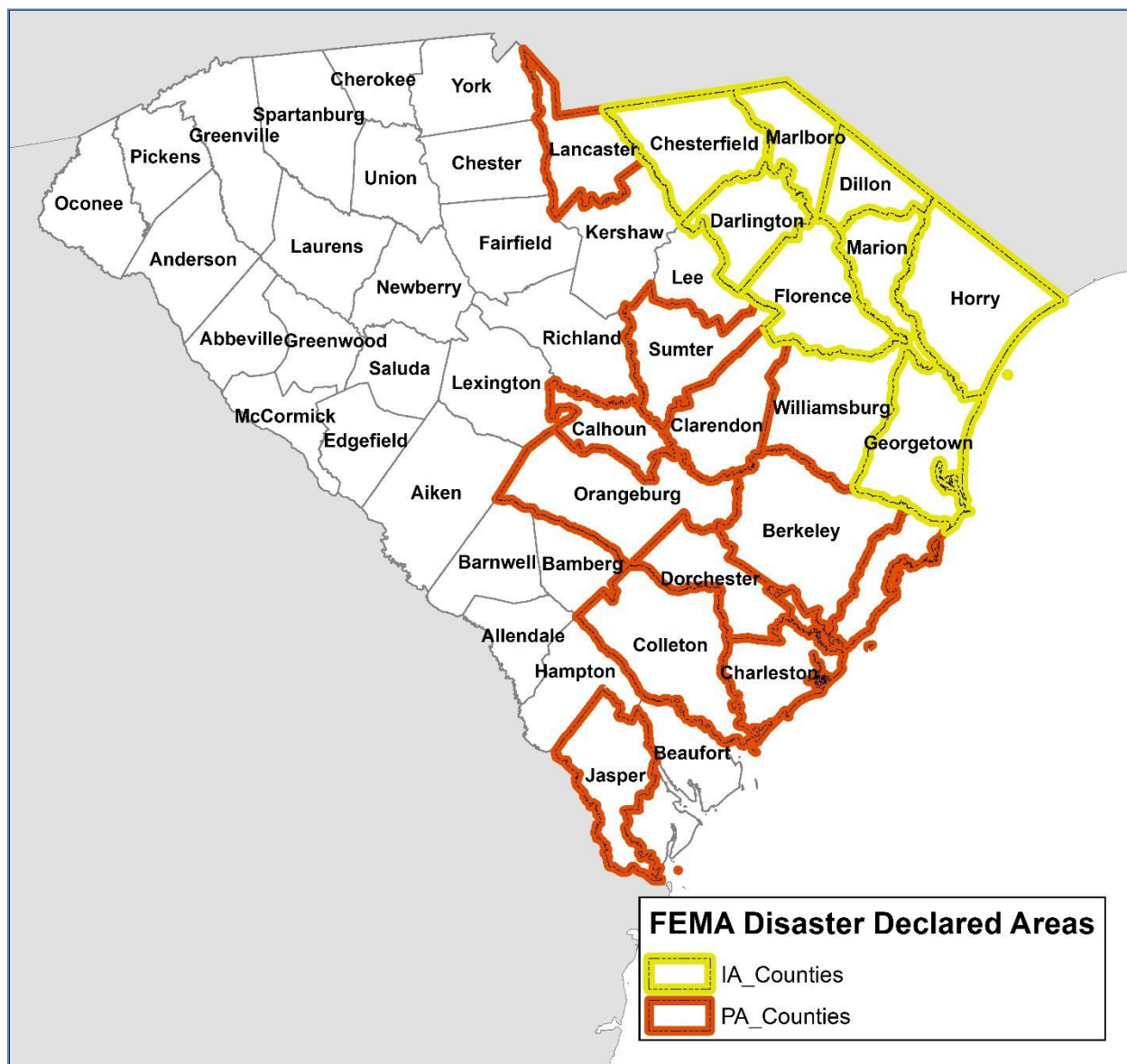


Figure 4. PDD 4394 Declared Counties.

Demographic and impact data for this report was largely generated using 2017 American Community Survey 5-Year Survey data, FEMA Individual Assistance (Sept. 19, 2019), and Small Business Administration Home Loan Program data (Aug. 15, 2019). A variety of data sources is used in determining Hurricane Florence's impacts and unmet needs, including information from several state and federal government data sources (Table 3. Data sources utilized in this assessment.

Table 3. Data sources utilized in this assessment.

Theme	Data	Source (and URL where available)
Impact Guidance	83 FR 40314	Housing and Urban Development - https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf
	85 FR 4681	https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf
	81 FR 39687	https://www.govinfo.gov/content/pkg/FR-2016-06-17/pdf/2016-14110.pdf
	82 FR 36812	https://www.govinfo.gov/content/pkg/FR-2017-08-07/pdf/2017-16411.pdf
	82 FR 5591	https://www.govinfo.gov/content/pkg/FR-2017-01-18/pdf/2017-01007.pdf
Demographics	United States Census Data	https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t
	HUD Income Limit Data	https://www.huduser.gov/portal/datasets/il.html#2018
	United States Census Households over 65 Living Alone	https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1101&prodType=table
	United States Census Median Family Income	https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_S1903&prodType=table
	United States Census Race	https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B02001&prodType=table
	United States Census County Quick Facts	https://www.census.gov/quickfacts/fact/table/fl/HSG010217
	Homelessness	South Carolina Coalition for the Homeless https://www.schomeless.org/media/1163/scich-report-731-final-draft-electronic.pdf
Economic Impacts	Small Business Administration Home Loan Report	Small Business Administration
	Small Business Administration Business Loan Report	Small Business Administration
	Hurricane Florence Insurance Payouts	https://doi.sc.gov/DocumentCenter/View/11376/2018-Status-Report-on-the-South-Carolina-Coastal-Property-Insurance-Market
Event Impacts	Shelter Needs	SCDHEC MHS Shelter Population data ¹²
	Hurricane Wind Speeds	ARA Windfield data https://www.designsafe-ci.org/data/browser/public/designsafe.storage.community//Recon%20Portal/Hurricane%20Florence%20Resources/ARA%20Windfield%20Data%20Day%207
	Storm Survey Data	Federal Emergency Management Agency - https://www.fema.gov/hurricane-florence
	Presidential Disaster Declaration Areas	https://www.fema.gov/disaster/4394

¹² Received in personal communication from SCDRO Dec. 4, 2019.

Housing Impacts	Low - Mod Income data	https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/
	FEMA Applicant Data - Homeowners	https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1
	FEMA Applicant Data - Renters	https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1
	FEMA Disaster Declaration Summaries	https://www.fema.gov/openfema-dataset-disaster-declarations-summaries-v1
	FEMA FIDA 4394	Federal Emergency Management Agency
Infrastructure Impacts	FEMA Dataset: Public Assistance Funded Project Details	https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1

Targeting Priority Needs

The State partnered with the Disaster Metrics, LLC. and Dr. Christopher T. Emrich to identify those areas most impacted and most vulnerable across the state. Disaster Metrics utilized the Social Vulnerability Index to inform the recovery action plan development process by empirically delineating the most socially vulnerable census tracts within each IA designated county. **Residents in these high vulnerability areas generally have a lower ability to adequately prepare for, respond to, and rebound from environmental impacts (such as floods), shocks and stresses.** Vulnerable populations will often require additional resources and support in order to bounce back. Failure to support vulnerable populations during disaster recovery may ultimately lead to additional impacts and resource needs weeks, months and years later.

Utilizing social vulnerability information in concert with FEMA damage data provides a standardized, replicable and pragmatic process for understanding where scarce resources would be most helpful in driving successful disaster recovery. This procedure results in a visualization of loss/vulnerability for the state where places with high population such as Florence and Myrtle Beach are characterized by a general attenuation of impacts due to lower levels of social vulnerability. Conversely, populations residing in the swath from Dillion to Chesterfield Counties, although much less heavily populated, are characterized by generally higher levels of social vulnerability—parts of Marion and Horry Counties have very high levels of social vulnerability and very high FEMA losses. Targeting resources to these most heavily impacted and vulnerable areas will yield the most effective benefit because these areas will be much less able to bounce back without outside assistance. While there was some damage in coastal areas of Horry and Georgetown Counties, the damage (according to an extensive analysis of FEMA Verified Loss Data) in interior areas is more extensive, especially when compounded with an inability to bounce back (social vulnerability).

SCDRO obtained from FEMA a list of Individual Assistance (IA) applicants and identified those applicants with a FEMA verified real property (housing) loss. Combining FEMA damage data at the zip code level – the finest level available from this set of FEMA data¹³, provided a more nuanced view of damages across

¹³ Applicant address (point via latitude and longitude) level impact and support data is available from FEMA but was not provided to the state.

the state. FEMA verified losses were overlaid with social vulnerability information to identify areas that were both heavily impacted and had a lower capacity to absorb such losses (Figure 5).

This geographic overlay, combining areas of highest vulnerability with the areas containing significant numbers of damaged homes, shown in the map below, clearly indicates that the counties in the Eastern part of the state (from Dillon southeast to the coast) **not only contain the highest rate of damaged homes but often also have the highest social vulnerability (Figure 5). Targeting support to these areas in the immediate and long-term recovery phases of the flood disaster will yield the best outcomes for those with the highest need.** The comprehensive analysis of Unmet Needs is discussed in detail in the Unmet Needs Assessment section.

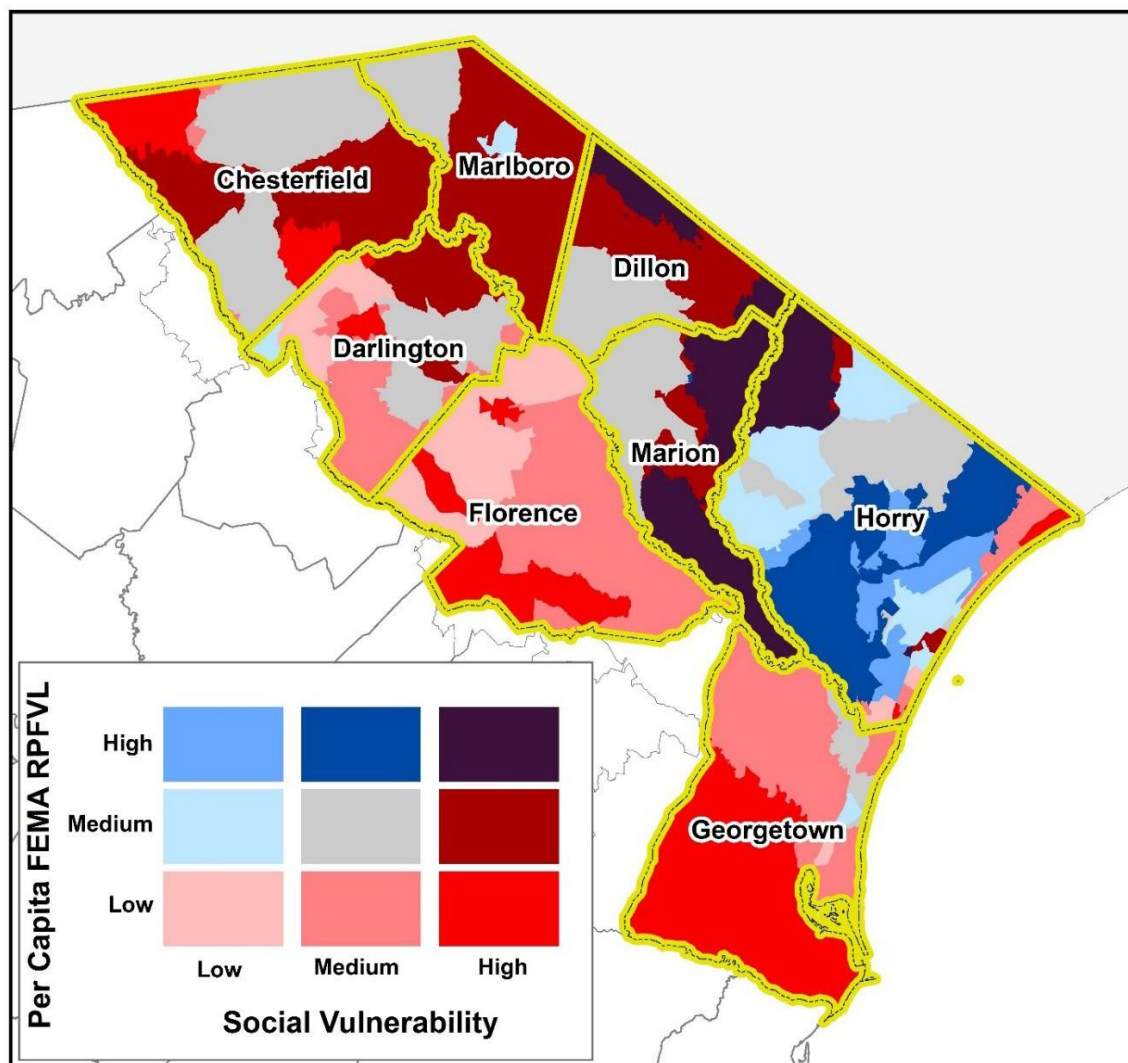


Figure 5. Bivariate Overlay of Damaged Housing Units and Social Vulnerability.

Unmet Needs Assessment

Demographic Profile of the Impacted Area

Table 4, below shows a breakdown of socioeconomics and demographics for the Hurricane Florence impacted counties of South Carolina. While many community characteristics across the impact area are similar to state trends and percentages, there are a few specific socio-demographic differences that should be addressed as a fuller discussion of unmet needs is created. **Less than 15 % of the South Carolina population resides in the impacted area covered in this assessment.** The population in the impacted area differs from the statewide population in several key areas.

First, the Florence impacted area has a much higher percentage of people living in poverty (22.64%) than the state (15.36%). This poverty is a primary indicator of places that might see greater impacts from disasters because of a general lack of ability to prepare for shocks and stresses. Additionally, the impact area has 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 and an African American population of 39.63% compared to the statewide average of 27.1%. Furthermore, these areas have lower labor force participation, lower median value of housing units, and lower median rent values. This indicates that when compared to the state as a whole, there is a higher relative concentration of individuals with vulnerabilities that influence how they respond to disaster events and will decrease their speed of recovery.

Table 4. Demographic Profile Information - American Community Survey Data, 2018 Release.

<i>People</i>	<i>Hurricane Florence Counties</i>	<i>South Carolina - Statewide</i>
<i>Population estimates, July 1, 2018</i>	745,147	5,084,127
<i>Persons under 5 years, percent, July 1, 2018</i>	5.53	5.8
<i>Persons 65 years and over, percent, July 1, 2018</i>	20.09	17.7
<i>White alone, percent, July 1, 2018</i>	56.5	68.5
<i>Black or African American alone, percent, July 1, 2018</i>	39.63	27.1
<i>American Indian and Alaska Native alone, percent, July 1, 2018</i>	1.38	0.5
<i>Asian alone, percent, July 1, 2018</i>	0.8	1.8
<i>Two or More Races, percent, July 1, 2018</i>	1.65	1.9
<i>Hispanic or Latino, percent, July 1, 2018</i>	3.44	5.8
<i>Foreign born persons, percent, 2013-2017</i>	3.04	4.9
<i>Housing units, July 1, 2018</i>	400,997	2,318,271
<i>Owner-occupied housing unit rate, 2013-2017</i>	69.23	68.6
<i>Median value of owner-occupied housing units, 2013-2017</i>	\$105,375	\$148,600
<i>Median gross rent, 2013-2017</i>	\$675	\$836
<i>Building permits, 2018</i>	5,641	35,487
<i>Households, 2013-2017</i>	279,823	1,871,307
<i>Persons per household, 2013-2017</i>	2.55	2.54
<i>Language other than English spoken at home, Percent 5 years+, 2013-2017</i>	4.14	6.9
<i>High school graduate or higher, percent of persons age 25 years+, 2013-2017</i>	80.51	86.5
<i>Bachelor's degree or higher, percent of persons age 25 years+, 2013-2017</i>	17.28	27
<i>With a disability, under age 65 years, percent, 2013-2017</i>	13.36	10.5
<i>Persons without health insurance, under age 65 years, percent</i>	14.14	12.7
<i>Per Capita health care and social assistance receipts/revenue, 2017 (\$1,000)</i>	5.18	4.51
<i>In civilian labor force, total, percent of population age 16 years+, 2013-2017</i>	54.95	59.9
<i>Median household income (in 2015 dollars), 2013-2017</i>	\$38,419	\$48,781
<i>Per capita income in past 12 months (in 2015 dollars), 2013-2017</i>	\$21,262	\$26,645
<i>Persons in poverty, percent</i>	22.64	15.3

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 CBDG-DR SC Florence allocation.

Impact on Low-and-Moderate-Income Populations

All programs supported by HUD Community Development Block Grant (CDBG) 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)¹⁴ - Table 5.

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:¹⁵

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

For the purpose of CDBG-Disaster Recovery programs, grantees apply the below terminology consistent with the original language of the Housing Act and reporting designations in the HUD Disaster Recovery Grant Reporting (DRGR) system.¹⁶

Table 5. HUD LMI Classifications.

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

Please refer to Appendix for 2019 Area Median Income Limits by Family Size and County, and **Error! Reference source not found.** for HUD Income Limits for income categories in the declared counties.

¹⁴ The HUD National objectives are established under the statutory authority of 42 U.S.C. §3531 and 42 U.S.C §5301.

¹⁵ 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.

¹⁶ HUD Program Income Limits are published annually for use across all HUD funded program and contain incongruous terminology to the Housing Act. Terminology published in the annual income limits is applied to other HUD funded formula allocation programs to support individual income group targets within the LMI category: <https://www.huduser.gov/portal/datasets/il.html>

Many of the counties in the impacted area have relatively high rates of low-and-moderate income (LMI) populations (Figure 6). Overall, the average LMI rate for counties across the state-impacted area was approximately 46.01%. Every presidentially declared IA county except Florence County is above the state average (42%) for LMI populations.

Table 6 illustrates the average LMI percentage across all block groups in any county and the maximum LMI of any single block group within that county. What becomes clear when looking at the maximum LMI values is that every county has at least one area characterized by very low-income levels. When block group populations are examined, additional LMI concentrations within each county become apparent, as illustrated in the map above. Detailed LMI maps of each presidentially declared Individual Assistance county with heavy impacts are show in (Figure 7 - Figure 14) below.

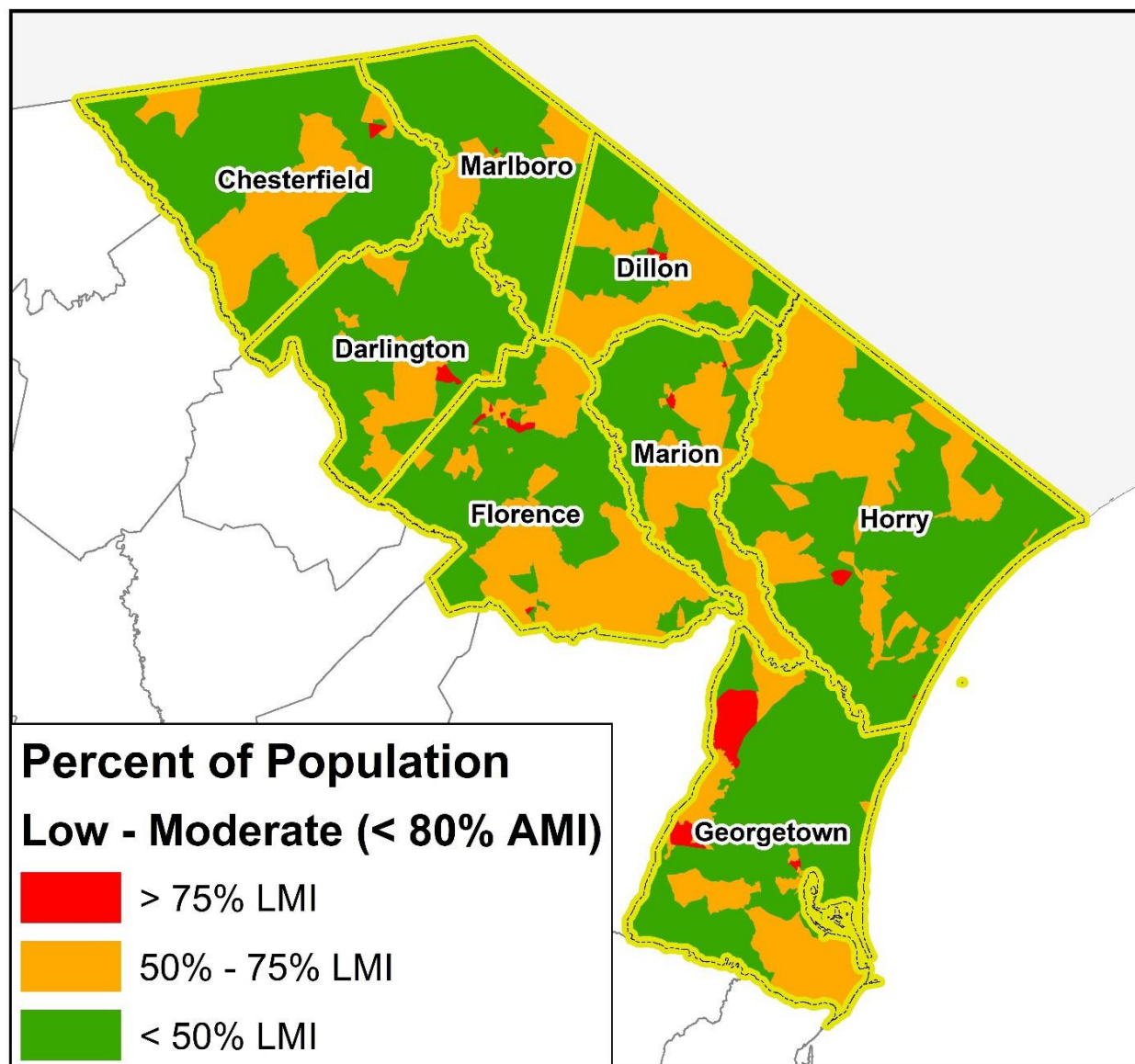


Figure 6. Low to Moderate Income by Block Group for IA Declared Counties.

Table 6. Low to Moderate Income Summary for Florence Impacted Counties.

County	Number of Block Groups	Minimum LMI %	Average LMI %	Maximum LMI %
<i>Chesterfield</i>	33	8.36%	46.63%	83.92%
<i>Darlington</i>	55	2.17%	42.85%	76.36%
<i>Dillon</i>	28	11.54%	51.74%	83.92%
<i>Florence</i>	107	0.00%	43.45%	84.66%
<i>Georgetown</i>	46	0.00%	44.37%	94.74%
<i>Horry</i>	149	0.00%	41.22%	79.74%
<i>Marion</i>	31	15.23%	49.63%	91.67%
<i>Marlboro</i>	24	24.28%	48.19%	91.82%

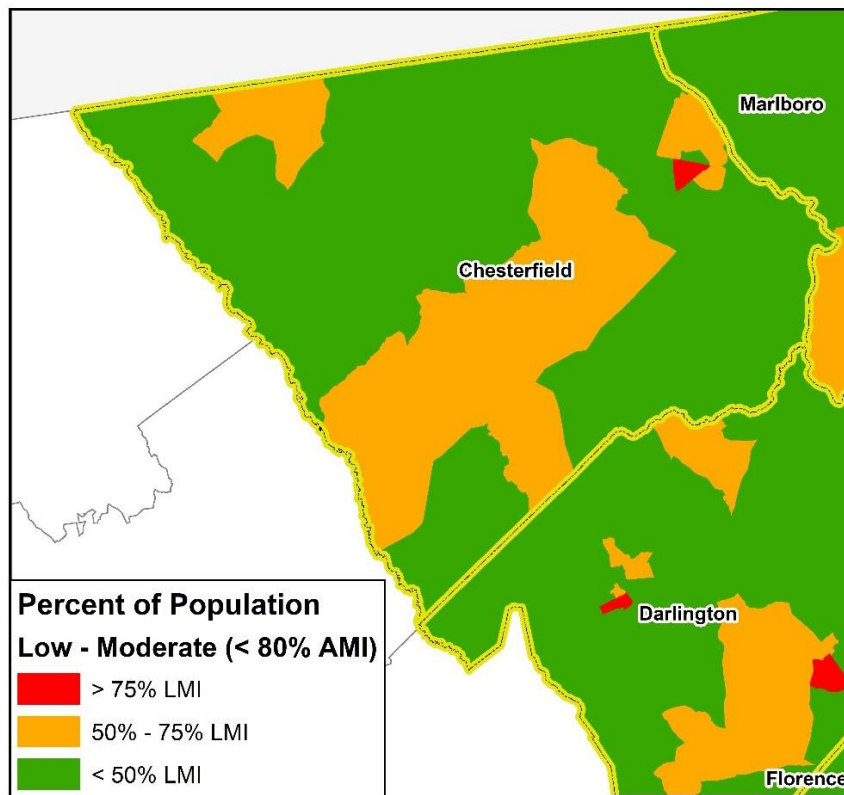


Figure 7. Low to Moderate Income by Block Group – Chesterfield County.

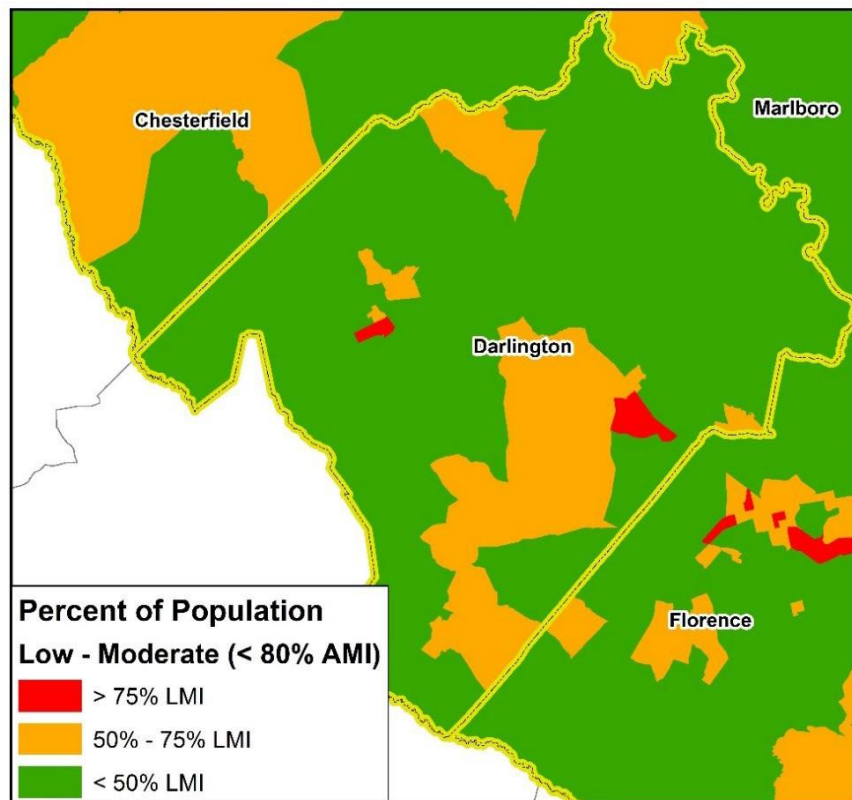


Figure 8. Low to Moderate Income by Block Group – Darlington County.

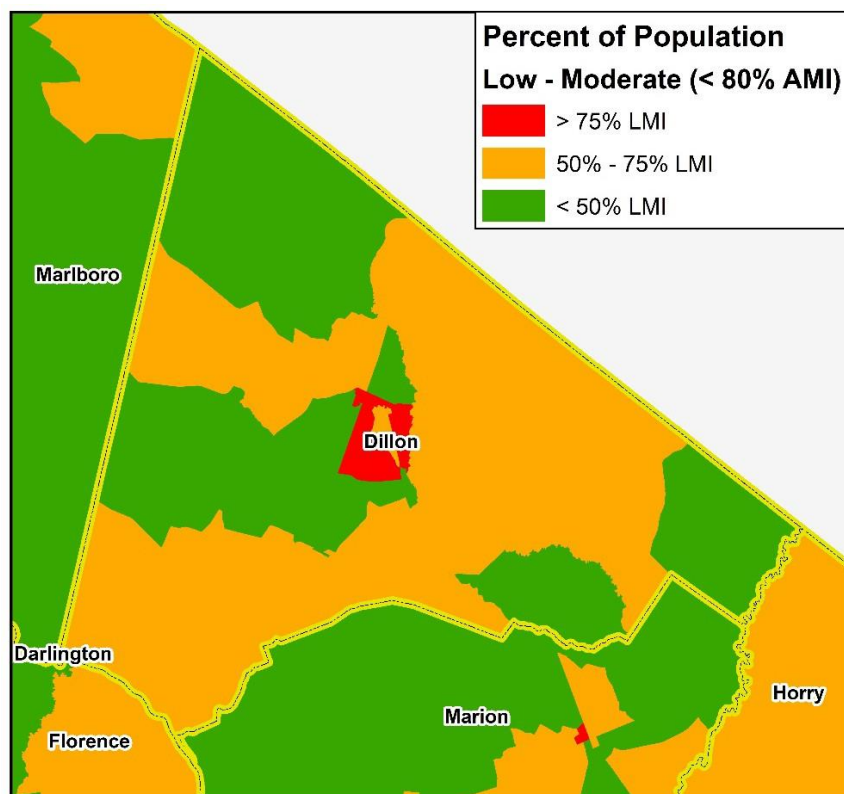


Figure 9. Low to Moderate Income by Block Group – Dillon County.

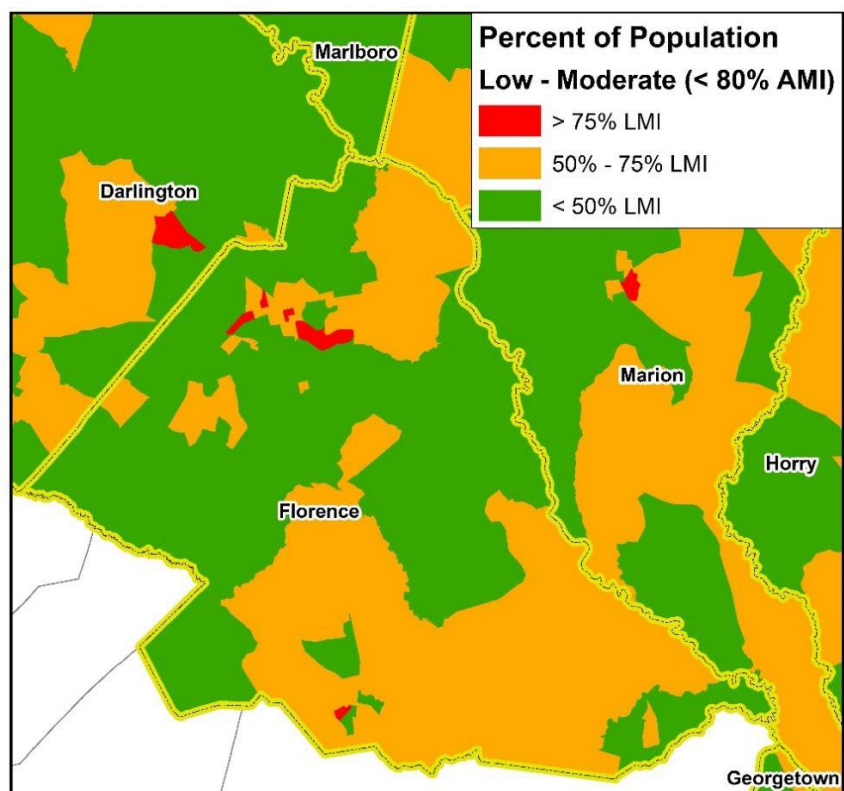


Figure 10. Low to Moderate Income by Block Group – Florence County.

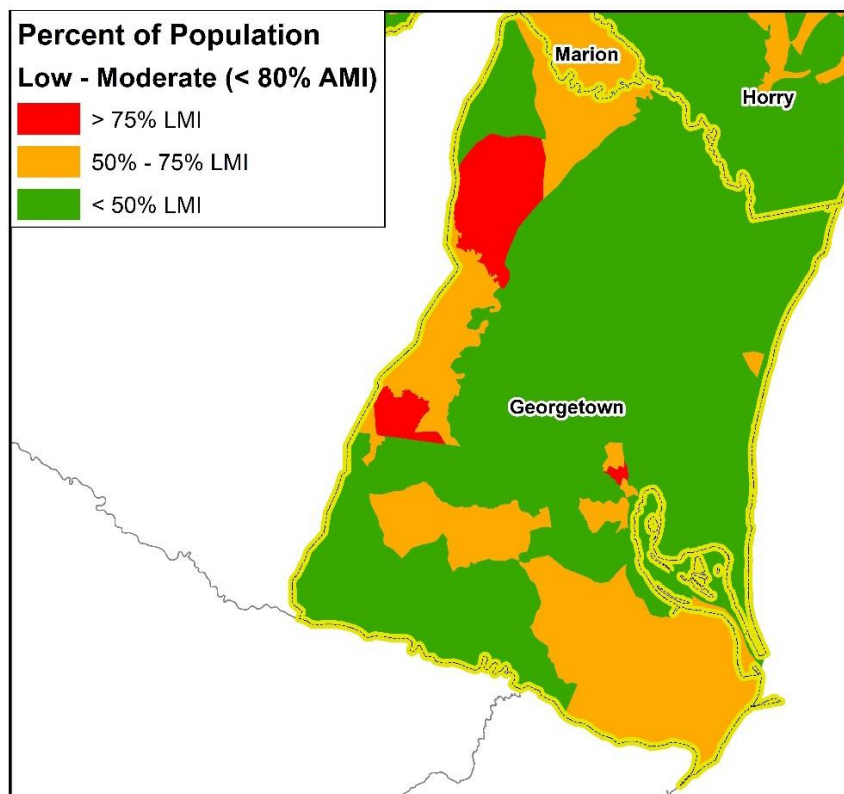


Figure 11. Low to Moderate Income by Block Group – Georgetown County.

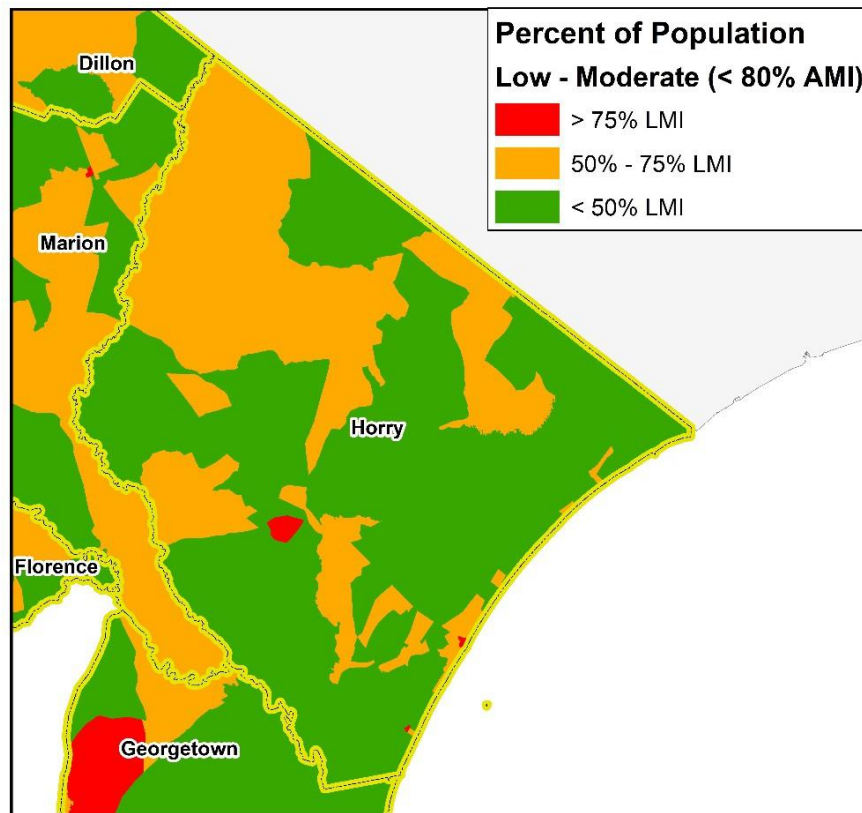


Figure 12. Low to Moderate Income by Block Group – Horry County.

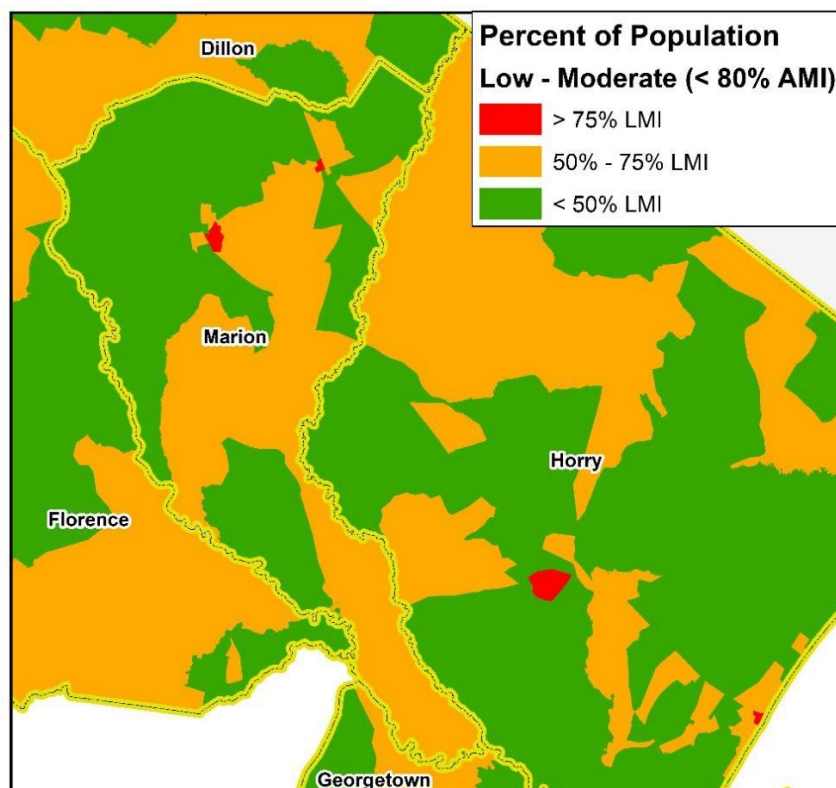


Figure 13. Low to Moderate Income by Block Group – Horry County.

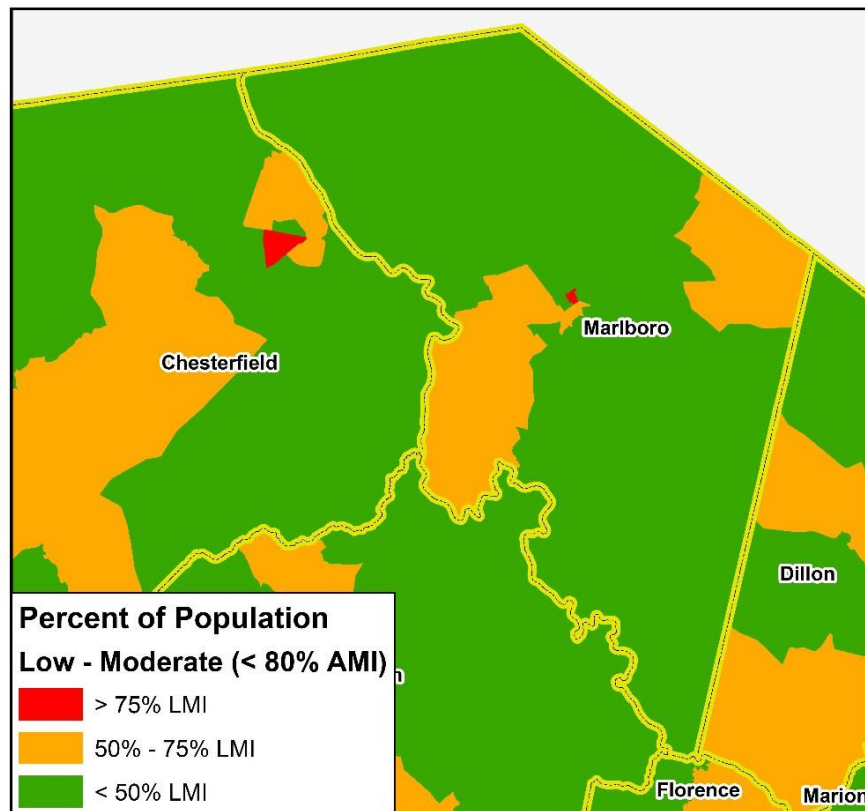


Figure 14. Low to Moderate Income by Block Group – Marlboro County.

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. They could have disabilities, live in institutions, have limited English proficiency or altogether non-English speaking.¹⁷

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 4.14% of the population in the impacted counties speaks a language other than English at home and does not understand English well, with Chesterfield (4.1%), Dillon (4.5%), Horry (7.5%), and Marlboro (4.1%) counties having the highest relative percent of the population speaking different languages and not understanding English well.¹⁸ Outreach for the Action

¹⁷ 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>

¹⁸ Source: U.S. Census Bureau, 2010-2015 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.

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 by census tract (Figure 15), followed by a (Table 7) that shows the number of residents who speak only English or who speak Spanish or other languages, by county.

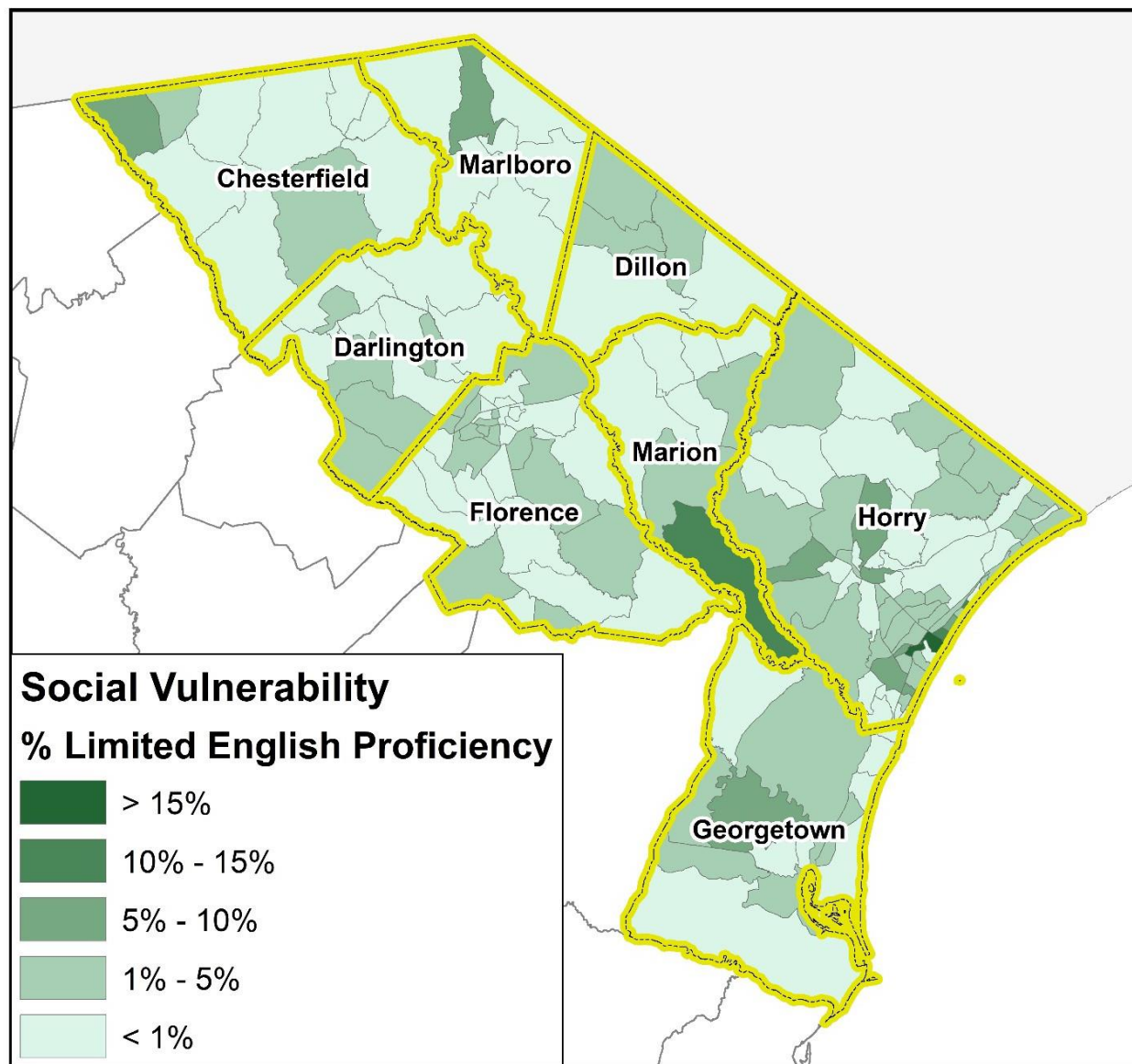


Figure 15. Percent population speaking English "not well" or not at all by census tract.

Table 7. Language Spoken at Home and Ability to Speak English for Persons 5 Years and Over in S.C. (2014-2017).

County	Total	Speaking English Only or English Very Well		Speak Spanish		Speak Indo-European Language(s)		Speak Asia-Pacific Languages		Speak Other Language	
		Total	%	Total	%	Total	%	Total	%	Total	%
<i>Chesterfield</i>	43,502	41,720	95.9%	1,560	3.6%	118	0.3%	59	0.1%	45	0.1%
<i>Darlington</i>	63,626	62,268	97.9%	862	1.4%	381	0.6%	64	0.1%	51	0.1%
<i>Dillon</i>	28,930	27,628	95.5%	731	2.5%	106	0.4%	20	0.1%	445	1.5%
<i>Florence</i>	129,715	125,040	96.4%	2,544	2.0%	1,309	1.0%	758	0.6%	64	0.0%
<i>Georgetown</i>	58,137	56,129	96.5%	1,425	2.5%	400	0.7%	183	0.3%	-	0.0%
<i>Horry</i>	294,436	272,422	92.5%	13,346	4.5%	4,666	1.6%	2,537	0.9%	1,465	0.5%
<i>Marion</i>	29,808	28,704	96.3%	827	2.8%	173	0.6%	104	0.3%	-	0.0%
<i>Marlboro</i>	26,045	24,990	95.9%	886	3.4%	109	0.4%	19	0.1%	41	0.2%

Being over the age of 65 or having children under the age of five contributes to the potential vulnerability of a household. The map below (Figure 16) shows concentrations of households with age dependent populations, by census tract. Concentrations of age dependent populations are noticeable in Florence, Georgetown and Horry Counties.

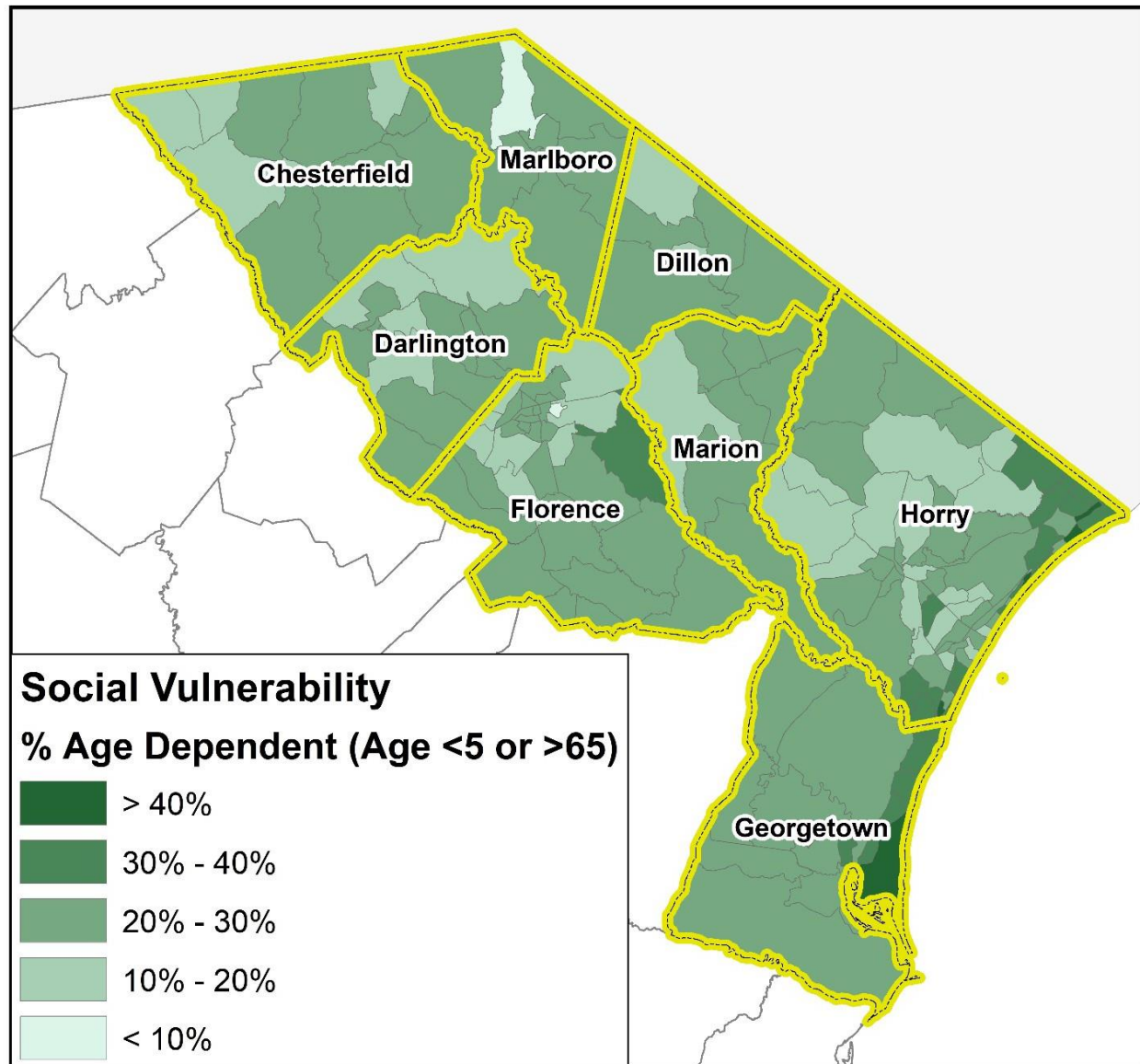


Figure 16. Percent population characterized as “age dependent” (Age < 5 or > 65) by census tract.

Additionally, Social Vulnerability considers the percentage of the population living below poverty level. The map below (Figure 17) shows relative concentrations of poverty in the northeast half of the state, followed by a map of larger concentrations of unemployment across the region (Figure 18).

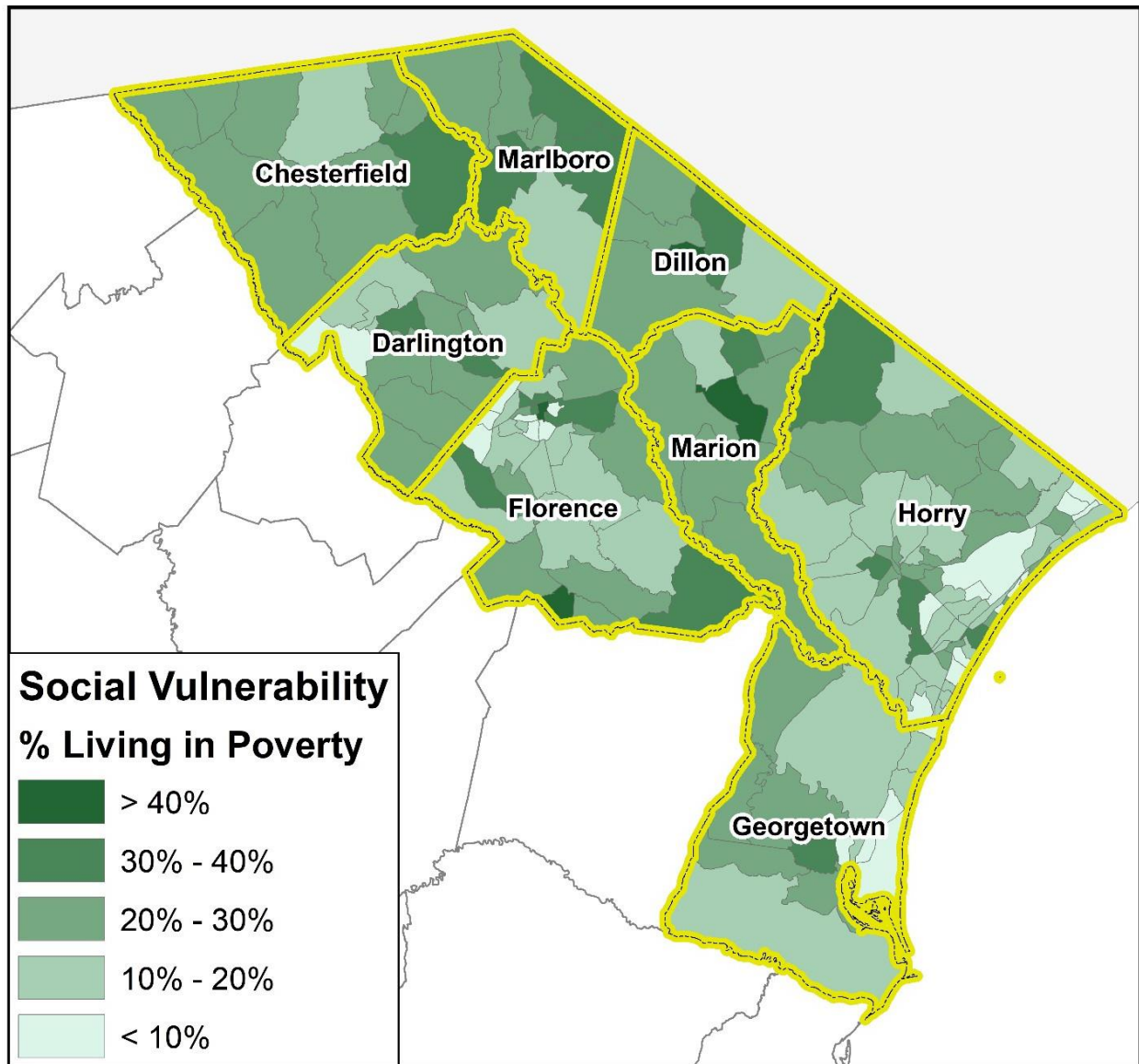


Figure 17. Percent persons living in poverty by census tract.

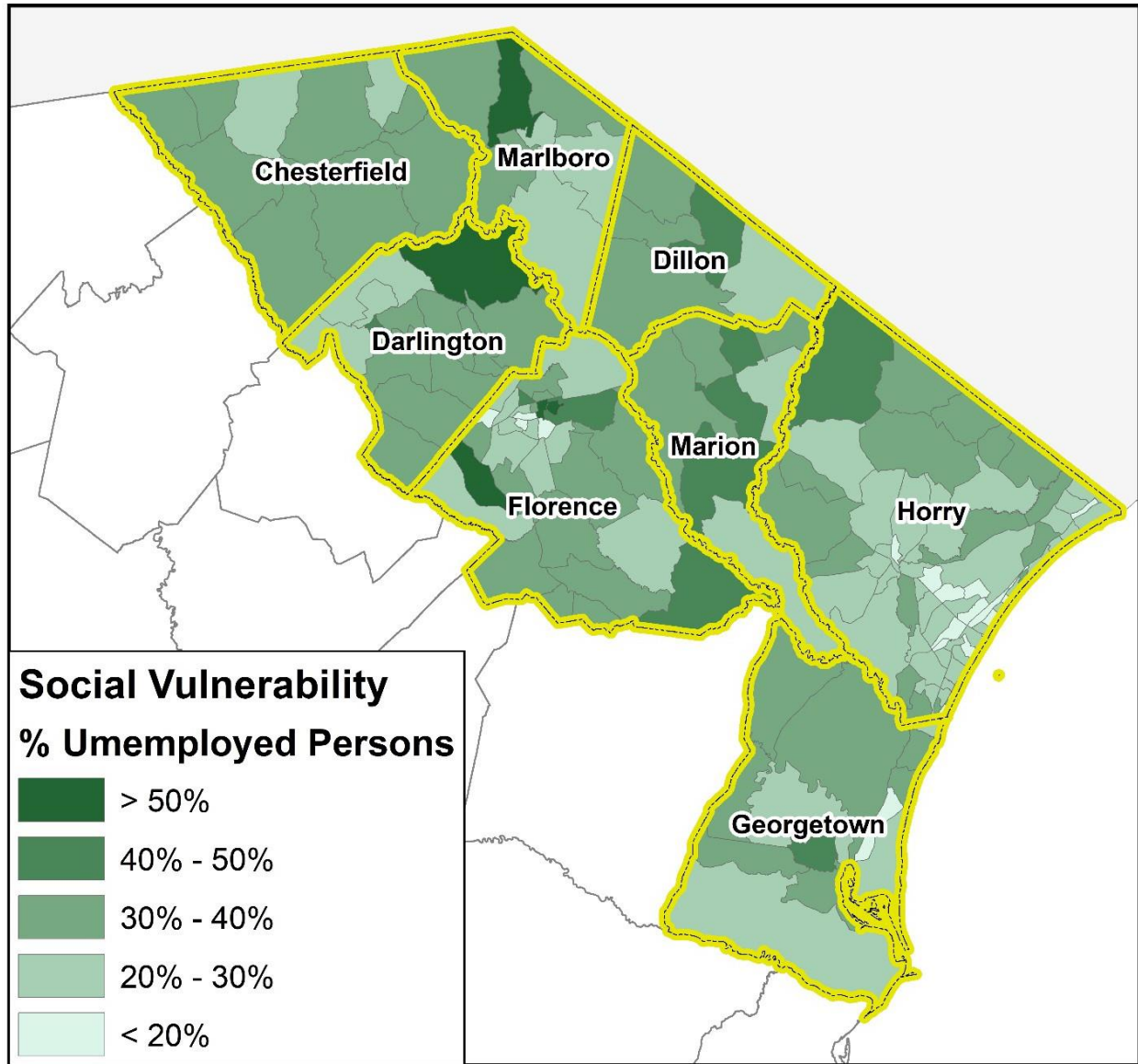


Figure 18. Percent of unemployed persons by census tract.

Transitional Housing/Homelessness

Hurricane Florence's triple threat of wind, rain and flooding impacted community members across all walks of life. While some may lose homes, others affected may be without homes both prior and following an event of such magnitude. In fact, homeless persons may be faced with even more adversity as others become displaced and shelters become more overcrowded. According to a 2019 Point-In-Time report from the South Carolina Coalition for the Homeless (and federally mandated by HUD), on any given night of January 2019 there were 4,172 homeless people in the state of South Carolina, a 6% increase from 2018 and caused entirely by a rise in unsheltered count. Approximately 41% of the homeless are considered to be unsheltered.¹⁹

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. Clients with HIV/AIDS impacted by Hurricane Florence continue to receive services through normal operations of the state's Housing Opportunities for Persons with HIV/AIDS (HOPWA).²⁰

Shelters for homeless individuals exist in Florence, and Horry counties within the impacted disaster area. New Directions, located in Horry County (Myrtle Beach) is the largest of the shelters, with a capacity of 170 individuals. Shelters in Florence County include the Courtney McGinnis Graham Community Shelter, House of Hope of the Pee Dee, and the PDCAA Shelter for the Homeless. None of these shelters reported any damage as a result of Hurricane Florence.

Emergency Shelters

The massive evacuation ordered for coastal South Carolina in the days preceding Florence emptied the coasts and filled hotels, motels, homes of friends and families, as well as public shelters across the state. Four healthcare facilities were evacuated to ensure that potentially flood-impacted facilities were safe and secure.²¹ The State, 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. The state opened shelters on Sept. 8 and ordered a mandatory evacuation of coastal counties. In total, 130 shelters in 33 counties housed an average of 775 people per night and a maximum of 6,148 people in any one night (Table 8).

¹⁹ <https://www.schomeless.org/media/1163/scich-report-731-final-draft-electronic.pdf>

²⁰ Confirmed with South Carolina Department of Health and Environmental Control, HOPWA program Dec. 16, 2019.

²¹ <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

Table 8. Shelter occupancy by county.

County	Number of Shelters Open	Number of Nights Open	Total Sheltered	Average Sheltered per night	Max Sheltered (any single night)
<i>Aiken</i>	8	2	-	-	-
<i>Allendale</i>	1	2	-	-	-
<i>Bamberg</i>	3	2	15	8	11
<i>Barnwell</i>	1	2	1	1	1
<i>Berkeley</i>	7	5	2,214	443	726
<i>Calhoun</i>	1	4	50	13	23
<i>Charleston</i>	1	1	37	37	37
<i>Chester</i>	2	3	88	29	63
<i>Chesterfield</i>	3	2	-	-	-
<i>Clarendon</i>	5	5	830	166	347
<i>Colleton</i>	1	5	231	46	72
<i>Darlington</i>	6	7	359	51	187
<i>Dillon</i>	3	10	1,171	117	327
<i>Dorchester</i>	8	5	533	107	209
<i>Edgefield</i>	1	-	-	-	-
<i>Fairfield</i>	1	2	12	6	10
<i>Florence</i>	13	9	1,771	197	638
<i>Georgetown</i>	5	10	602	60	219
<i>Hampton</i>	3	-	-	-	-
<i>Horry</i>	19	32	11,355	355	2,263
<i>Jasper</i>	1	3	123	41	64
<i>Kershaw</i>	1	3	78	26	54
<i>Lancaster</i>	1	2	17	9	13
<i>Lee</i>	2	7	114	16	61
<i>Lexington</i>	1	-	-	-	-
<i>Marion</i>	6	25	2,268	91	351
<i>Marlboro</i>	3	8	828	104	467
<i>Orangeburg</i>	8	5	453	91	227
<i>Richland</i>	3	5	353	71	111
<i>Saluda</i>	1	2	8	4	8
<i>Spartanburg</i>	1	3	28	9	15
<i>Sumter</i>	2	5	420	84	210
<i>Williamsburg</i>	5	7	790	113	301
<i>York</i>	3	2	53	27	31
<i>Grand Total</i>	130	185	24,802	775	6,148

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. A social vulnerability index utilizing the most recent census data (2013-2017) measures the social vulnerability of all census tracts with population in the PDD 4394 area of interest. The index is a comparative metric facilitating examination of differences in social vulnerability across census tracts, the building blocks of counties. It graphically illustrates the variation in social vulnerability across the Hurricane Florence impact area, shows where there is uneven capacity for preparedness and response, and helps pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery. Utilizing social vulnerability is also useful as an indicator in determining the differential recovery from disasters.

The social vulnerability index synthesizes socioeconomic variables, which the research literature suggests contributes to reduction in a community's ability to prepare for, respond to and recover from hazards. An outline of the variables influential in vulnerability for Hurricane Florence Individual Assistance declared counties is shown in Table 9.

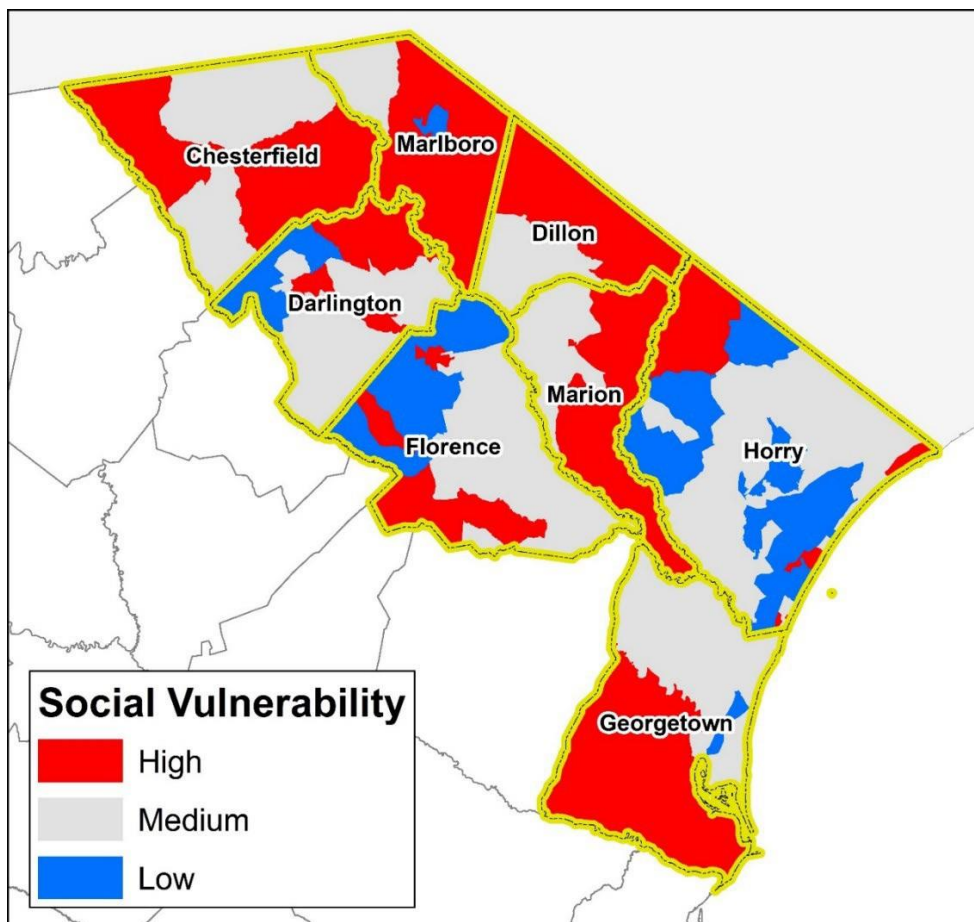


Figure 19. Tract level 3-Class Social Vulnerability Index (SoVI) for PDD 4394 IA Declared Counties.

Table 9. Social Vulnerability for Hurricane Florence IA Counties.²²

PDD 4394 - South Carolina Tract Level 2013 - 2017 Social Vulnerability Component Summary					
Component	Cardinality	Description	% Variance Explained	Dominant Variables	Variable Loading on Component
1	+	Class and Race (Black)	14.687	Higher %Female Headed Households	0.852
				Higher % Black	0.767
				Higher % Poverty	0.696
				Higher % Female Labor Force	0.692
				Higher % Service Sector Employment	0.526
				Higher % < 12th Grade Education	0.505
				Lower % Children in 2 parent families	-0.552
				Lower Per Capita Income	-0.593
2	+	Age (Old)	13.647	Higher % Age Dependent Population	0.884
				Higher Median Age	0.856
				Higher % Social Security Beneficiaries	0.854
				Higher % Unccoccupied Housing Units	0.703
				Lower number of people per unit	-0.571
3	-	Wealth and Race (Asian)	12.589	Higher % Wealthy	0.746
				Higher House Values	0.683
				Higher % Asian Populations	0.665
				Higher Per Capita Income	0.636
				Lower % < 12th Grade Education	-0.530
				Lower % Mobile Homes	-0.719
4	+	Ethnicity (Hispanic) and Lack of Healthcare	10.665	QESL	0.911
				QHISP	0.881
				QNOHLTH	0.792
5	+	Employment (Service Sector) and Gender (Female)	10.402	QNOAUTO	0.912
				QFEMALE	0.743
				QCVLUN	0.624
				QFAM	-0.599
6	+	Race (Native American) and Emloyment (Primary Sector)	6.504	QNATAM	0.670
				QEXTRCT	0.524
				QRENTBURDEN	-0.605
7	+	Special Needs	5.650	QNRRES	0.754
				MDGRENT	-0.542
Cummulative Variance Explained			74.142		
29 variables, tracts with 0 populations and 0 housing units excluded					

²² Component scores and composite social vulnerability scores in the accompanying maps 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 social vulnerability composite score is obtained by summing all component scores. Input data are derived from the Five-Year American Community Survey, 2013-17.

The Social Vulnerability Index has high utility as a decision-support tool for emergency management. The social vulnerability index metric turns historical disaster impact measures into actionable information for emergency managers, recovery planners and decision makers. It empirically measures and visually depicts a population's (in)ability to adequately prepare for, respond to and rebound from disaster events. Operationally, Social vulnerability assessment is now part of FEMA's Geospatial Framework, the set of spatial products delivered automatically by FEMA upon Presidential Disaster Declaration. Figure 19 and Figure 20 (below) depict social vulnerability for the Hurricane Florence counties in PDD 4394.

We utilize the social vulnerability index here for one main reason, namely its past success at providing actionable and useful information to decision makers. Social vulnerability data was instrumental in targeting resources to those who were in most need during recovery and rebuilding operations in South Carolina following the catastrophic flooding of 2015. The October 2015 flooding in South Carolina was the first implementation of a methodology to understand pre-event social conditions across the impact area in a post-event recovery context. Social vulnerability 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, social vulnerability scores were 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. Utilizing empirically based measures of community social vulnerability 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. Social vulnerability information also provided an academic tool to graphically illustrate and assist Voluntary Organizations Active in Disasters (VOADs) in prioritizing their recovery efforts. In other words, South Carolina expedited recovery by using data-driven assessment tools to guide actionable, effective relief to the most vulnerable populations.

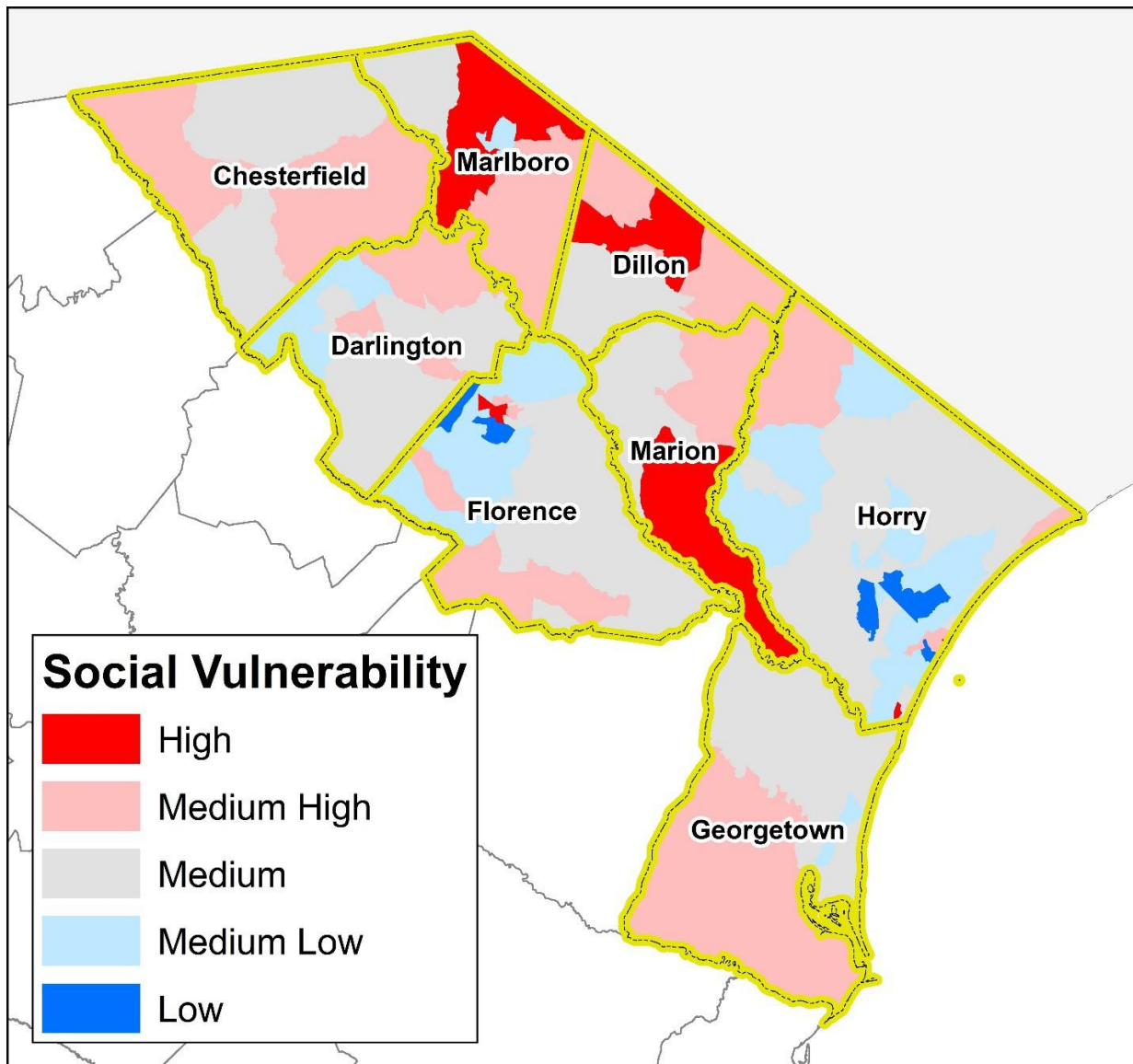


Figure 20. Tract level 3-Class Social Vulnerability Index (SoVI) for PDD 4394 IA Declared Counties.

Civic Engagement

Voluntary Organizations Active in Disasters (VOAD), philanthropic organizations, and faith-based organizations are often the first line of defense when it comes to community recovery. Following the devastating flooding in 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. Hurricane Florence recovery has been no different. Volunteer Organizations Active in Disaster (VOADs), many still onsite and working to help rebuilding efforts from the 2015 floods, ramped up operations for Hurricane Florence relief. Even today, the South

Carolina VOAD community continues to coordinate relief efforts across 18 organizations, multiple state agencies and federal government officials as available.²³

To assist these organizations, the One SC Fund, established by the Central Carolina Community Foundation and endorsed by Governor Nikki Haley, continues to support recovery across the state. 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. However, specific to Hurricane Florence, the One SC Fund Grants Committee granted \$1,055,000 across four waves of awards in support of relief and recovery projects across the state.^{24,25,26,27}

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

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 Hurricane Florence in South Carolina is \$911,226,169 across the housing, economy and infrastructure sectors combined. The figures provided in this assessment are based on best available data at this time and may be adjusted in the future as additional data becomes available. After considering the funds already made available through insurance, state and other federal assistance and other funds totaling more than \$238 million, the remaining overall unmet need is approximately \$674 million. **The federal allocation of \$72 million will allow the State to address about 11% of the remaining unmet need.**

When examining the relative need by sector (Figure 21 and Table 10), housing represents the greatest need with \$577,535,240 (85.66% of total) in unmet need, followed by the economic sector with \$86,276,633 (12.8%) of total in unmet need, followed by the infrastructure sector with 10,376,724 (1.54% of total) unmet need. Each of these three sectors will be addressed in greater detail in the following sections.

²³ <http://scemd.org/recovery-section/donations-and-volunteers>

²⁴ <https://yourfoundation.org/one-sc-fund-awards-165000-for-hurricane-florence-relief/>

²⁵ <https://yourfoundation.org/one-sc-fund-awards-275000-for-hurricane-florence-relief/>

²⁶ <https://yourfoundation.org/one-sc-fund-awards-250000-for-hurricane-florence-relief/>

²⁷ <https://yourfoundation.org/one-sc-fund-awards-365000-for-hurricane-florence-relief/>

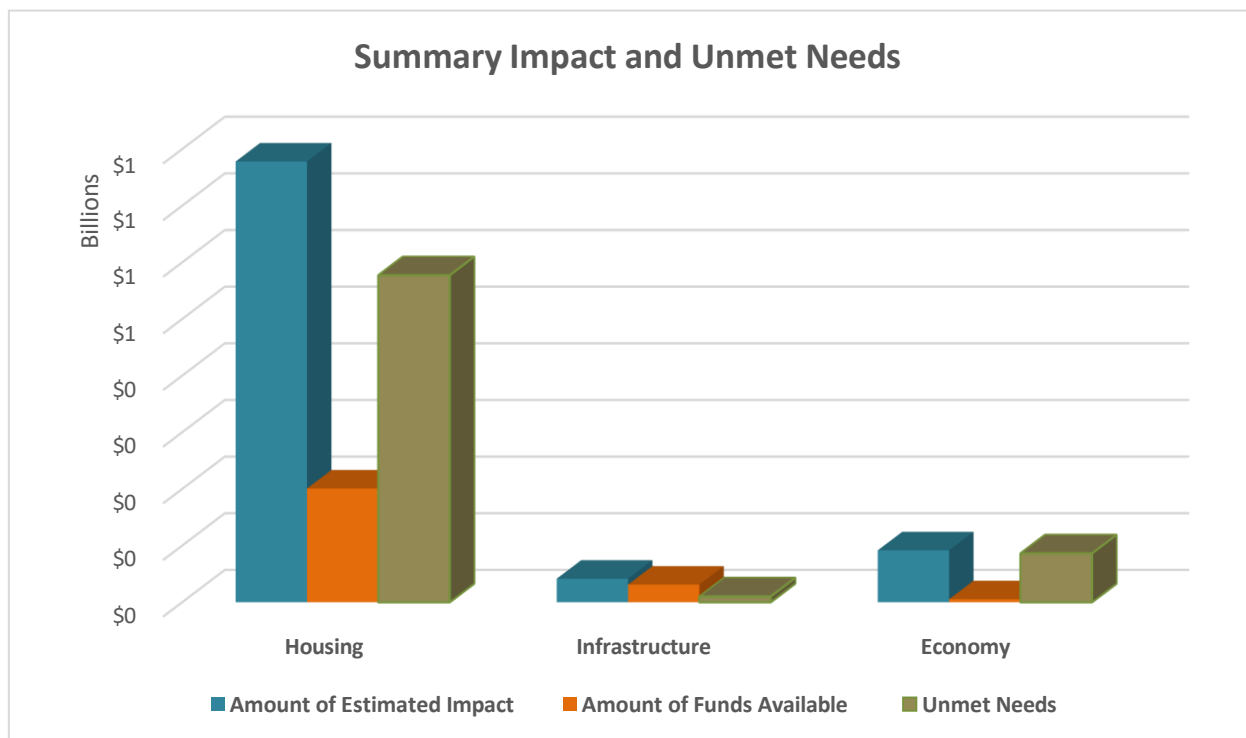


Figure 21. Unmet Need Summary.

Table 10. Summary of Impacts/Support by Sector.

Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
<i>Amount of Estimated Impact</i>	\$778,100,041	\$41,506,895	\$91,619,233	\$911,226,169
<i>Amount of Funds Available</i>	\$200,809,611	\$31,130,172	\$5,342,600	\$237,282,383
<i>Unmet Needs</i>	\$577,290,430	\$10,376,724	\$86,276,633	\$673,943,786
<i>Percent of Total</i>	85.66%	1.54%	12.80%	

Housing Impact

The impacts to housing from Hurricane Florence and subsequent flooding were widespread. Single family homeowners in stick-built homes, single family homeowners in mobile homes, and renters in various housing types of housing stock were affected. Table 11 and Table 12, below, show the FEMA Full Verified Loss (FVL) determinations in the Florence impacted counties by owner and renter.

Table 11. Hurricane Florence FEMA IA Owner Applicant Summary by County.²⁸

County	# of Applicants	Number Inspected	% Inspected	Total with FEMA Full Verified Loss (FVL)	% With FEMA Full Verified Loss	FEMA Full Verified Loss Total	Average FEMA Full Verified Loss (per damaged unit)
<i>Chesterfield</i>	1,172	949	80.97%	774	81.56%	\$803,451	\$1,038
<i>Darlington</i>	567	481	84.83%	381	79.21%	\$474,557	\$1,246
<i>Dillon</i>	1,607	1,358	84.51%	1,205	88.73%	\$2,580,760	\$2,142
<i>Florence</i>	347	295	85.01%	239	81.02%	\$156,932	\$657
<i>Georgetown</i>	387	323	83.46%	211	65.33%	\$236,672	\$1,122
<i>Horry</i>	4,870	3,855	79.16%	3,194	82.85%	\$23,087,027	\$7,228
<i>Marion</i>	1,568	1,380	88.01%	1,151	83.41%	\$5,880,813	\$5,109
<i>Marlboro</i>	1,366	1,136	83.16%	953	83.89%	\$1,493,569	\$1,567

Table 12. Hurricane Florence FEMA IA Renter Applicant Summary by County.²⁹

County	# of Applicants	Number Inspected	% Inspected	% Inspected with Damage	% Inspected with No Damage	Total with Moderate Damage	Total with Major Damage	Total with Substantial Damage
<i>Chesterfield</i>	188	148	78.72%	12.16%	87.84%	18	0	0
<i>Darlington</i>	91	73	80.22%	23.29%	76.71%	16	1	0
<i>Dillon</i>	729	600	82.30%	27.50%	72.50%	161	4	0
<i>Florence</i>	113	78	69.03%	8.97%	91.03%	7	0	0
<i>Georgetown</i>	123	68	55.28%	22.06%	77.94%	15	0	0
<i>Horry</i>	2111	1297	61.44%	27.37%	72.63%	330	25	0
<i>Marion</i>	509	411	80.75%	26.52%	73.48%	98	11	0
<i>Marlboro</i>	335	269	80.30%	20.07%	79.93%	52	2	0

Housing Types Affected

More than 16,000 applicants filed for FEMA (IA) Individual Assistance statewide as a result of Hurricane Florence. Of those who specified housing unit type, about 76% are home owners, including single family

²⁸ <https://www.fema.gov/openfema-dataset-housing-assistance-data-owners-v1>

²⁹ <https://www.fema.gov/openfema-dataset-housing-assistance-data-renters-v1>

homes, duplex units, mobile homes and other housing types (Table 13). The remaining 24% are renters, including renters of single-family homes, mobile homes, apartment units and other housing types (Table 14).

Table 13. FEMA IA Applicants: Statewide.³⁰

Housing Unit Type	Count of Applicants
<i>House/Duplex</i>	4,723
<i>Owner</i>	4,337
<i>Renter</i>	386
<i>Mobile Home or Travel Trailer</i>	3,923
<i>Owner</i>	3,679
<i>Renter</i>	244
<i>Other*</i>	7,712
<i>Not Specified</i>	158
<i>Owner</i>	3,955
<i>Renter</i>	3,599
<i>Grand Total</i>	16,358
*Includes: Apartment, Assisted Living, Boat, College Dorm, Condo, Correctional Facility, Military Housing, Other, Townhouse, Travel Trailer. This table includes all IA counties	

Table 14. FEMA IA Applicants – Other Ownership Type.

Residence Type	Not Specified	Owner	Renter	Grand Total
<i>Apartment</i>		1	101	102
<i>Boat</i>		2		2
<i>Condo</i>		37	21	58
<i>Other</i>		1	5	6
<i>Townhouse</i>		12	9	21
<i>(blank)</i>	148	3,473	3,182	6,803
<i>Grand Total</i>	148	3,526	3,318	6,992

³⁰ Source: FEMA FIDA Data

Single Family

Median housing values range from over \$250,000 to well below \$50,000 in different regions of the state. Higher value homes are concentrated along the coast and in Florence (Figure 22).

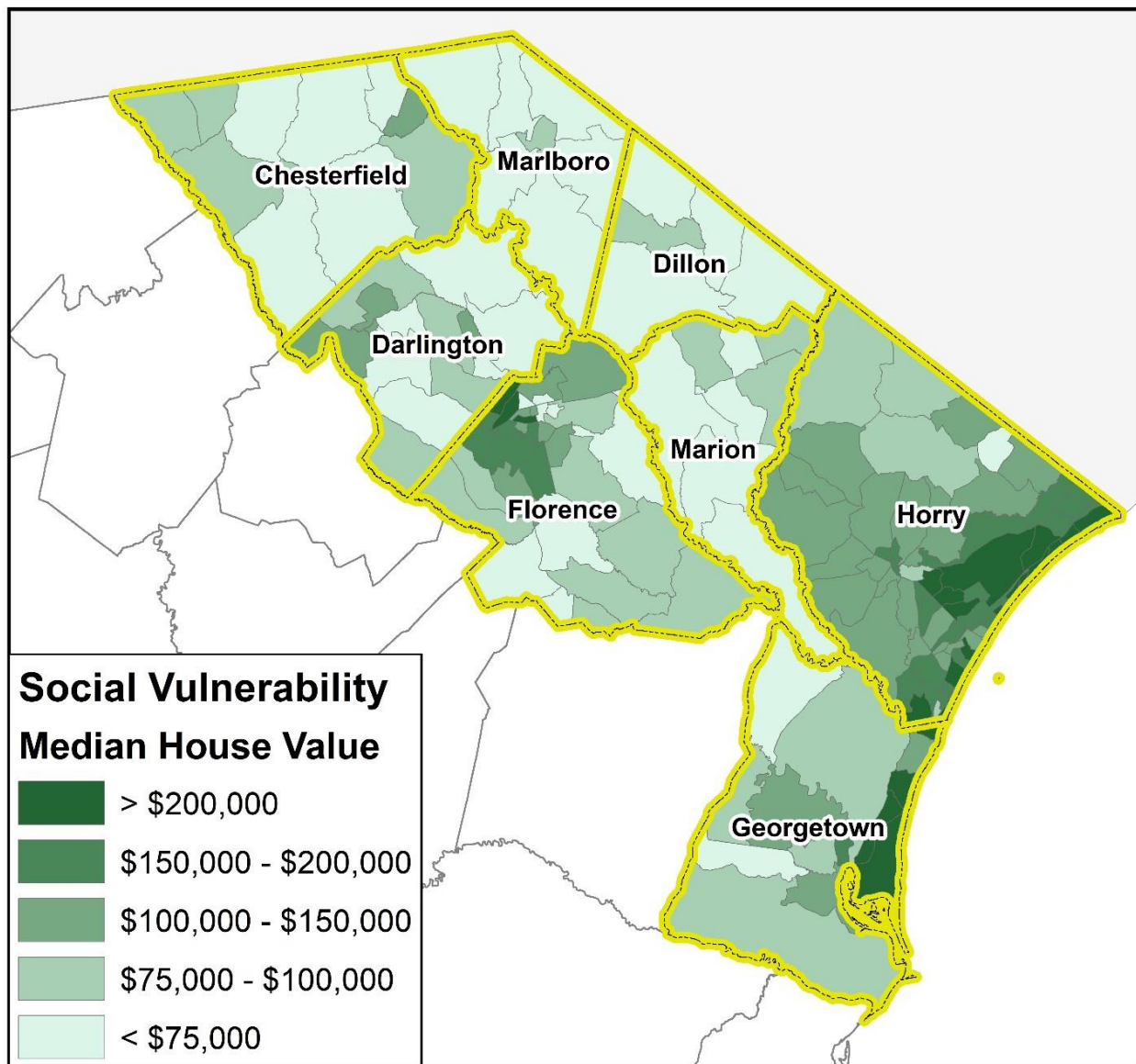


Figure 22. Median house value by census tract.

There are around 385,402 housing units in the entire impacted area, more than 75% of which were built before 1999, and most of which are owner-occupied units, as shown in the map below (Figure 23). With much of the housing stock in the 30-year range (Table 15), key systems such as electrical, roofing, water heaters and furnaces may have already cycled through a replacement life-span in many homes.

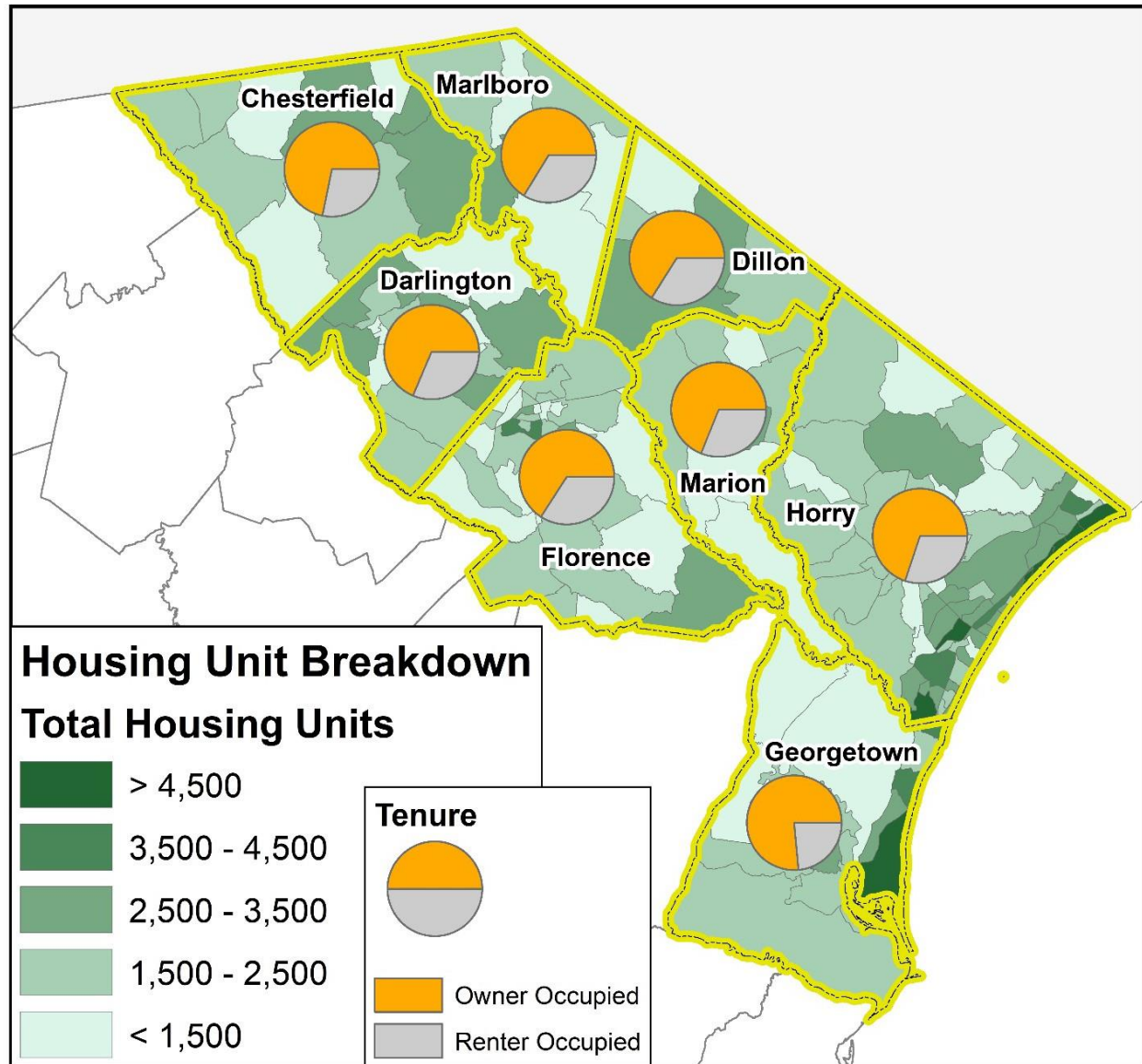


Figure 23. Housing stock count by tenure.³¹

³¹

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B25003&prodType=table

Table 15. Age of Housing Stock: Percentage of Units by Year Built, by County.³²

County	Total Housing Units	Percentage of Units by Year Built					
		2010 or Newer	2000-2009	1980-1999	1960-1979	1940-1959	Pre 1940
<i>Chesterfield</i>	21,531	2.12%	13.73%	37.06%	27.63%	11.21%	8.25%
<i>Darlington</i>	30,631	2.02%	8.80%	37.81%	30.50%	12.88%	7.99%
<i>Dillon</i>	13,733	1.92%	9.40%	39.49%	30.39%	14.63%	4.17%
<i>Florence</i>	59,722	2.47%	13.65%	36.49%	32.31%	11.33%	3.76%
<i>Georgetown</i>	34,628	2.80%	19.79%	43.48%	22.34%	7.94%	3.66%
<i>Horry</i>	198,229	5.30%	28.88%	45.79%	15.28%	3.74%	1.01%
<i>Marion</i>	14,907	2.90%	6.88%	40.11%	33.92%	13.12%	3.07%
<i>Marlboro</i>	12,021	1.83%	8.56%	34.75%	32.73%	11.50%	10.62%
<i>Total</i>	385,402	3.88%	21.08%	42.23%	22.26%	7.43%	3.12%

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 1999.³³ 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 was 16% according to the Census, American Community Survey (2014-2018).³⁴ The median rent for the state is \$868 monthly. Of the FEMA applicants to the IA program for the state-assessed area, more than 4,356 live in rental housing; 3,442 of whom declared an income less than \$30,000.

As indicated by the map below (Figure 24), 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.

³²

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B25034&prodType=table

³³ SCI WAY – SC Housing Statistics Website

³⁴ <https://data.census.gov/cedsci/table?id=ACS%205-Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&g=0400000US45>

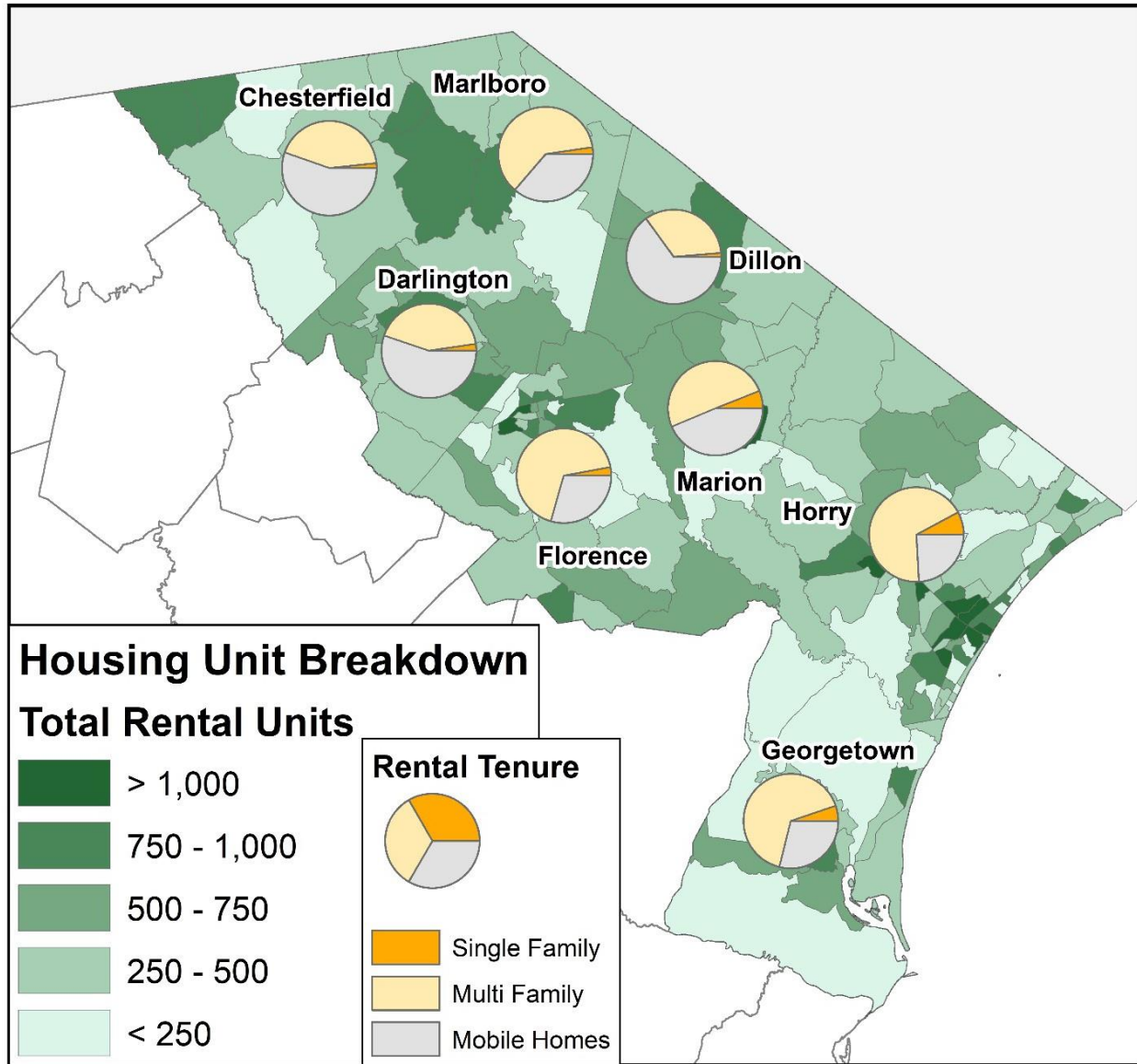


Figure 24. Rental housing unit breakdown by county and structure type.³⁵

Mobile Homes

Mobile homes (Figure 25) 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, rain, and flooding damage to mobile homes is often difficult to repair, due to the integrated nature of the building components. In addition, when considering whether or not a structure is repairable, the cost of making those repairs may be disproportionately high when considering the overall value of the structure.

³⁵

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_5YR_B25032&prodType=table

Often, the full extent of mobile home damage is not always realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home's structure or insulation can develop over time as well. Limited assistance funds 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 3,847 of them reside in mobile home units.

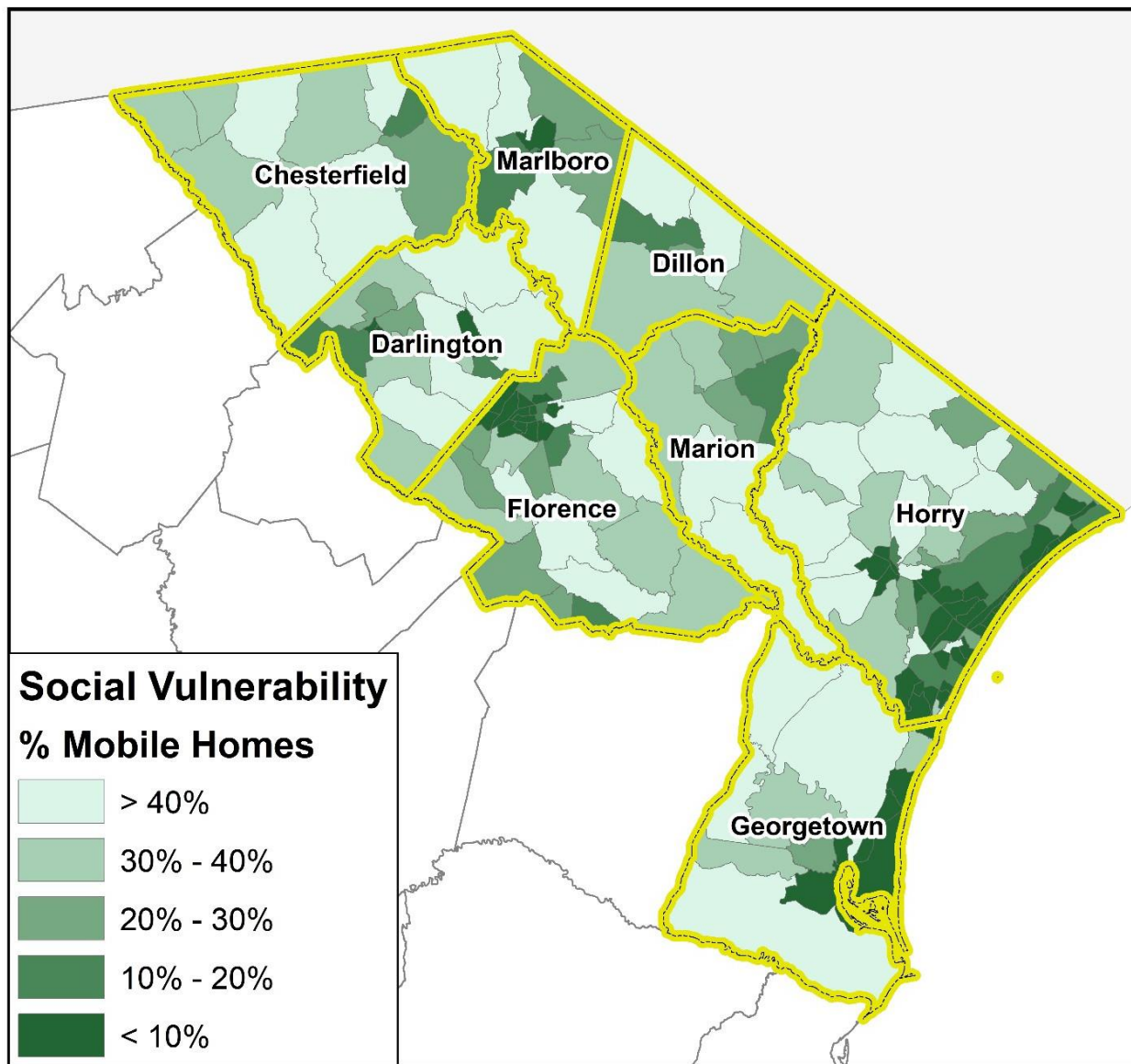


Figure 25. Mobile home percentages by census tract.

Mobile homes and damage to these vulnerable structures was also concentrated in rural, non-urban areas, as illustrated in the map above. Mobile homes damaged in Horry, Dillon and Marion Counties

combine to account for nearly 65% of the total mobile homes damaged across the state. Across the state there were 3,627 mobile homes with a FEMA Real Property Verified Losses (Table 16).

Table 16. Mobile homes with FEMA Verified Losses from Florence.

County	Mobile Homes Applicants	Mobile Homes with Real Property FEMA Verified Loss
<i>Chesterfield</i>	317	310
<i>Darlington</i>	215	207
<i>Dillon</i>	692	660
<i>Florence</i>	292	267
<i>Georgetown</i>	123	116
<i>Horry</i>	1,308	1,207
<i>Marion</i>	508	487
<i>Marlboro</i>	392	373
<i>Total:</i>	3,847	3,627

Summary Tables

When looking at the FEMA IA applicant population, many of the applicants either reside in high vulnerability areas, as defined by High social vulnerability scores, or Medium-High social vulnerability areas. Of these residents, there are subsets of populations over the age of 65, and additionally, who are over 65 and have access and functional needs (AFN). These applicants, and those who are low-income, often have the fewest means of assistance available to them. The tables below (Table 17) provide breakouts of FEMA IA applicants into categories considering ownership versus rental, age, and access and functional needs.

Table 17: Applicant breakdowns by access and function needs and age.

County	Tenure	Number of Applicants Meeting Each Criteria		
		With Access and Functional Needs	Over 65 Years	Over 65 with Access and Functional Needs
Chesterfield	Owner	15	377	7
	Renter	5	19	
	Unknown		4	
Darlington	Owner	11	182	4
	Renter	1	11	
	Unknown		1	
Dillon	Owner	28	391	11
	Renter	20	75	3
	Unknown	1	4	1
Florence	Owner	17	318	5
	Renter	13	23	1
	Unknown		2	
Georgetown	Owner	10	115	3
	Renter	4	5	
	Unknown		1	
Horry	Owner	79	1,153	25
	Renter	65	114	8
	Unknown		14	
Marion	Owner	21	442	10
	Renter	19	34	1
	Unknown		7	
Marlboro	Owner	22	449	10
	Renter	9	25	2
	Unknown		6	
Total		340	3,772	91

Public Housing

Public Housing is an integral piece of the State's housing resources for low-income persons. Statewide, there are approximately 32 section 8 public housing participants who were in some way impacted by

Hurricane Florence.³⁶ Table 18 shows the number of impacted households by county. Fortunately, all of these units were repaired in June/July 2019 and all residents were invited to re-inhabit units.

Table 18: Section 8 participants impacted by Florence.

County	# of Section 8 Participants
<i>Chesterfield</i>	0
<i>Darlington</i>	0
<i>Dillon</i>	32
<i>Florence</i>	0
<i>Georgetown</i>	0
<i>Horry</i>	0
<i>Marion</i>	0
<i>Marlboro</i>	0
Total:	32

Fair Housing

The State's Analysis of Impediments to Fair Housing, conducted in 2018, was conducted in conjunction with the 2016-2020 Consolidated Plan³⁷ and will be refreshed in accordance with the new Consolidated Plan being submitted this year.

The State, including multiple stakeholders such as the South Carolina Human Affairs Commission (HAC), the South Carolina Department of Consumer Affairs (DCA), and the South Carolina 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 2018 Consolidated Plan notes that:

*"The continued availability of federal and state funding is perhaps the single most important factor affecting whether and how well the state can implement its strategies for fair housing and removal of impediments. Federal dollars, which were shrinking in prior years, are now severely threatened as the national budget shortfall worsens. The future remains uncertain, particularly as new discussions emerge over whether to increase the federal debt limit and ways to balance the federal budget."*³⁸

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.

³⁶ Personal communication with SCDRO on 2/24/2020

³⁷ <https://www.scdhec.gov/sites/default/files/docs/Health/docs/stdhiv/HCD-ActionPlanDraft.pdf>

³⁸ <https://www.cdbgsc.com/wp-content/uploads/2018/10/2018-South-Carolina-AI-Update-3-2018.pdf> (p. 47)

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 social vulnerability as well as public involvement. 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.

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 eight counties declared eligible to receive Individual Assistance funding through FEMA in the Florence area of interest, there were 16,837 applicants.

Of these, 8,094 had a FEMA Property Loss (FVL) assessment; however, this does not mean that the applicant actually received funding. Of the applicants with an FVL, 3,588 received housing assistance (HA). An estimated \$20,059,622 in damage was assessed for the applicants with an FVL. This, coupled with housing assistance for applicants with no FVL, has resulted in \$21,647,384 in housing assistance to date (

Table 19).

Table 19: Applicants by FEMA Verified Losses and FEMA Housing Assistance Support

Florence Impacted Counties	FEMA IA Applicants	Percentage of Applicants	Amount of Housing Assistance	Average Housing Assistance
<i>Universe (All Counties)</i>	16,837			
<i>Had FEMA Real Property Loss</i>	8,094	48.07%		
<i>Received HA</i>	3,588	21.31%	\$20,059,622	\$5,591
<i>Received No HA</i>	4,506	26.76%	\$0	\$0
<i>No FEMA Real Property Loss</i>	8,743	51.93%		
<i>Received HA</i>	850	5.05%	\$1,587,762	\$1,868
<i>Received No HA</i>	7,893	46.88%	\$0	\$0

FEMA Individual Assistance (IA)

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Specifically, housing funds are for bridging the gap from sheltering to the return to permanent housing. These funds can be used for limited basic home repairs and replacement of essential

household items as well as rental payments for temporary housing. Importantly, FEMA IA is limited to bring a home back to a basic level of “safe and sanitary living or functioning condition,” and may not account for the full extent of the home’s damage or need.

National Flood Insurance Program (NFIP) Coverage

Major flooding disasters continue to be rare events for South Carolina, and Hurricane Florence was unique in that the state saw storm surges, wind and rain followed by riverine flooding in the eastern portion of the state as flood waters made their way south from North Carolina to the coast through all of the declared counties in South Carolina.³⁹ Unfortunately, most of the state lacks any form of flood insurance. According to FEMA’s OPEN NFIP data⁴⁰, only 37,911 policies were in force in 2018 meaning that of the 2,318,271 housing units across the state, only 1.6% percent of South Carolina’s housing units were covered by NFIP policies at the end of 2018.⁴¹ This low level of insurance uptake can be the result of properties being “heirship” (deeded down from parents or grandparents) or lien-free because the home no longer has a mortgage associated with it. Without a bank note, an owner may not be aware of the home’s location in the floodplain, or they may choose to forego flood insurance since it is not mandated.

Error! Reference source not found. indicates an uptick in NFIP policies in 2016, following the 2015 floods, and a larger number of policies year over year generally. Although flood insurance coverage tends to jump slightly after a major disaster event and South Carolina proved this to be true in the short run. However, Table 20 shows a significant decrease in homes carrying flood insurance just two short years after 2015’s major flood disaster. South Carolina had only 37,911 policies in place at the end of 2018 compared to more than 87,000 in 2016.

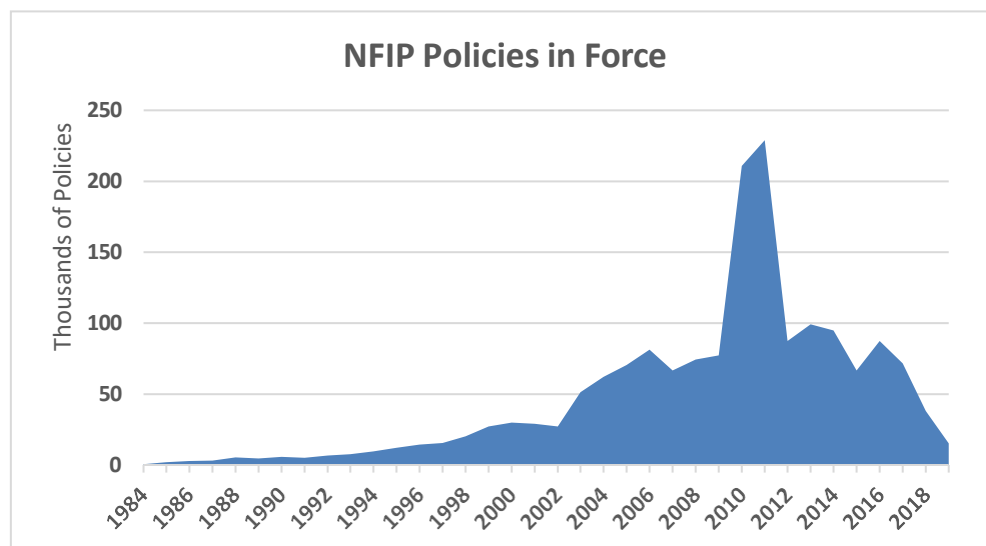


Figure 26. National Flood Insurance Policies by year for South Carolina.⁴²

³⁹ <https://www.cbsnews.com/news/hurricane-florence-aftermath-flooding-envelops-south-carolina-homes-death-toll-rises-2018-09-26/>

⁴⁰ <https://www.fema.gov/news-release/2019/06/11/fema-publishes-nfip-claims-and-policy-data>

⁴¹ <https://www.census.gov/quickfacts/SC>

⁴² The Open NFIP data documents many more policies in 2010 and 2011 than the surrounding years possibly indicating erroneous data.

Table 20: NFIP Policies by Year for South Carolina.

Year	Policies	Year	Policies
1984	451	2002	27,132
1985	1,905	2003	51,356
1986	2,887	2004	62,101
1987	3,105	2005	70,519
1988	5,294	2006	81,270
1989*	4,595	2007	66,651
1990	5,679	2008	74,344
1991	5,068	2009	77,235
1992	6,533	2010	210,684
1993	7,599	2011	228,899
1994	9,617	2012	87,446
1995	11,963	2013	99,091
1996	14,223	2014	94,734
1997	15,477	2015	66,712
1998	20,240	2016	87,406
1999	27,121	2017	71,594
2000	29,802	2018	37,911
2001	28,922	2019	15,183

Small Business Administration (SBA) Home Loans

The SBA has made \$27,426,837 in assistance available to 1,067 homeowner applicants in the Hurricane Florence impact area for residential repairs, rebuilding or relocations (Table 21). The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this disaster event was \$25,705. It is important to note that the average SBA loan is nearly five times more than the average FEMA HA payment of \$5,591. This important difference will be discussed more in this section.

Table 21. SBA Home Loan Summary.

SBA Rebuild/Repair Loan Type	Number of Loans	Total Loan	Average Loan
<i>Reconstruction</i>	8	\$806,900	\$100,863
<i>Relocation</i>	14	\$1,073,200	\$76,657
<i>Repair</i>	823	\$21,195,337	\$25,754
<i>Manufactured Home</i>	222	\$4,351,400	\$19,601
<i>Across All Programs</i>	1067	\$27,426,837	\$25,705

Housing Unmet Need

Approximately 10,409 FEMA Individual Assistance applicants (61.8%) 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.”⁴³*

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

The insurance-defined differences between flood damage and water damage are technical in nature and can be misunderstood by residents and damage inspectors alike. Damage from a flood occurs when water rises on land that is usually dry. However, water damage occurs when the water strikes the home prior to making contact with the ground. In many cases, a resident may not have the protection of flood insurance if they rent, live in a home with no mortgage, and/or live in a moderate-to-low -risk flood hazard area.⁴⁴ 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.

⁴³ <http://www.fema.gov/news-release/2013/05/21/ineligible-fema-may-just-need-more-information>

⁴⁴ Fast Home Help: <http://www.fasthomehelp.com/blog/2013/03/26/flood-damage-versus-water-damage-123804>

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.”⁴⁵

The chart below shows the percent of people who applied to FEMA IA who have received an award, by county, as well as the number of applicants receiving funds. On average, the award rate is approximately 27.11% for the impacted counties. This number will continue to fluctuate as applicants move through the review pipeline, but it will not go up or down significantly from this low level of support (Figure 27).

⁴⁵ 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

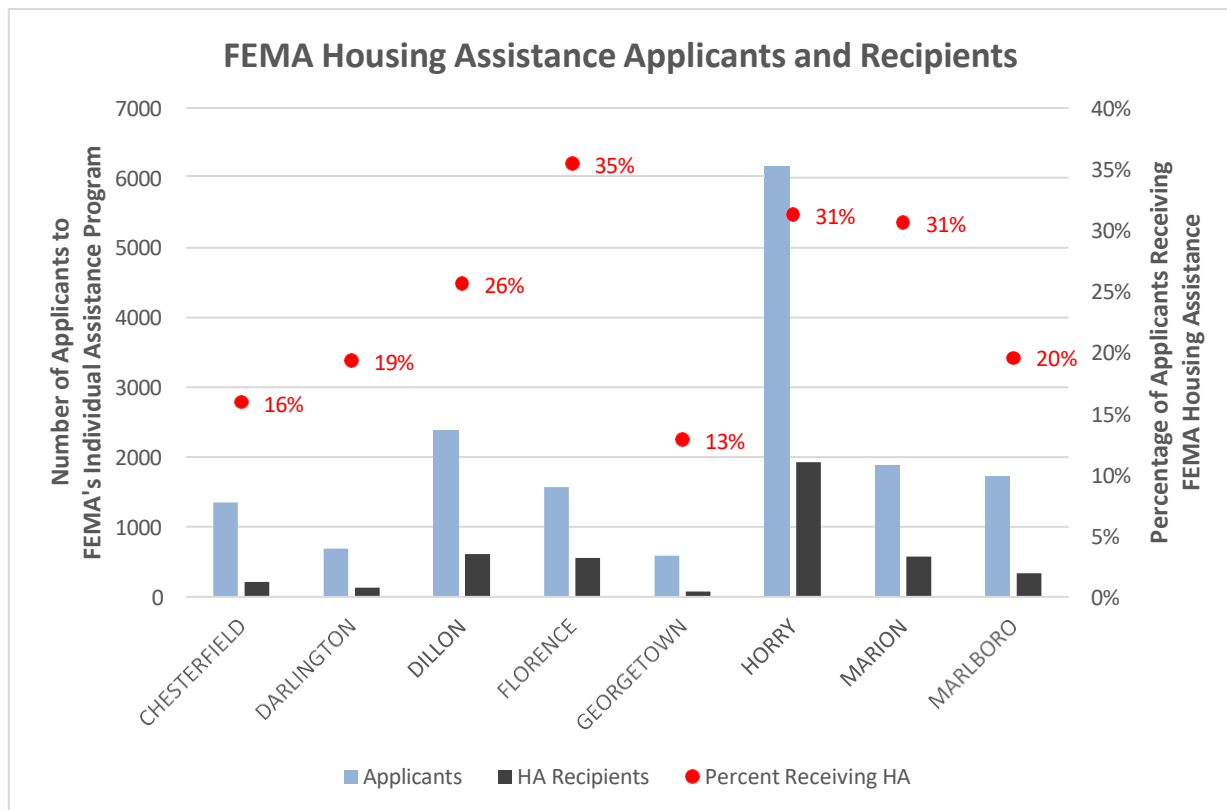


Figure 27. FEMA HA Funds Allocations by County.

For this event, just as in the October 2015 flooding disaster, an overwhelming majority of *ineligible* FEMA IA applicants are living at or below federal poverty standards. Across the Florence impact areas, 71% (7,360) of applicants have a stating income less than \$30,000 (Table 22 and

Table 23). Figure 28 graphically depicts this breakdown where we can see that most ineligible applicants make well below \$60,000 and more than half have incomes less than \$30,000.

Table 22. Ineligible applicants by income category and county.

County	\$0 or Not Reported	< \$10,000	\$10,001 - \$30,000	\$30,001 - \$60,000	> \$60,001	Total Applicants
<i>Chesterfield</i>	62	140	495	246	128	1,071
<i>Darlington</i>	25	96	279	117	31	548
<i>Dillon</i>	102	307	875	298	108	1,690
<i>Florence</i>	70	110	326	175	97	778
<i>Georgetown</i>	30	69	174	64	31	368
<i>Horry</i>	318	480	1,464	727	358	3,347
<i>Marion</i>	76	239	654	211	52	1,232
<i>Marlboro</i>	80	217	672	224	79	1,272
<i>Total</i>	763	1,658	4,939	2,062	884	10,306

Table 23: Percentage of ineligible applicants by income category and county.

County	\$0 or Not Reported	< \$10,000	\$10,001 - \$30,000	\$30,001 - \$60,000	> \$60,001	Total Applicants
<i>Chesterfield</i>	5.79%	13.07%	46.22%	22.97%	11.95%	1,071
<i>Darlington</i>	4.56%	17.52%	50.91%	21.35%	5.66%	548
<i>Dillon</i>	6.04%	18.17%	51.78%	17.63%	6.39%	1,690
<i>Florence</i>	9.00%	14.14%	41.90%	22.49%	12.47%	778
<i>Georgetown</i>	8.15%	18.75%	47.28%	17.39%	8.42%	368
<i>Horry</i>	9.50%	14.34%	43.74%	21.72%	10.70%	3,347
<i>Marion</i>	6.17%	19.40%	53.08%	17.13%	4.22%	1,232
<i>Marlboro</i>	6.29%	17.06%	52.83%	17.61%	6.21%	1,272
<i>Total</i>	7.40%	16.09%	47.92%	20.01%	8.58%	9,235

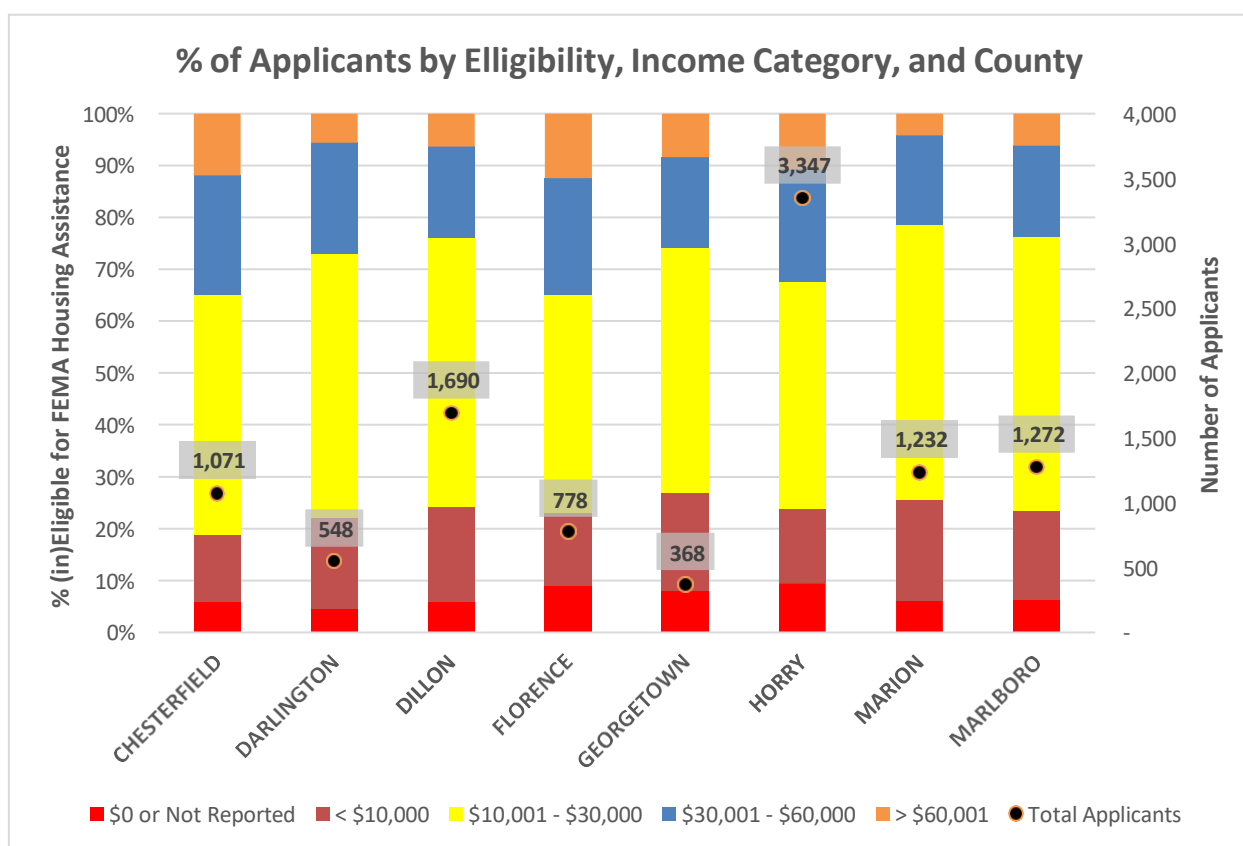


Figure 28. Applicant Summary by Eligibility, Income Category, and County.

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

The map below (Figure 29) shows that while FEMA IA ineligible applicants are disbursed across the state, there are concentrations of ineligible applicants in areas of high social vulnerability. Areas in southeast Chesterfield, central Darlington, north and central Dillon, south Georgetown, northeast Marlboro, and northeast Marion all have high numbers of ineligible applicants in high social vulnerability areas. Most

ineligible recipients saw the same impacts as those found eligible and will likely have a slower recovery because they likely experienced very similar impacts as those felt by FEMA eligible victims. For this reason, ineligible applicants must be considered in any overall housing unmet need calculation.

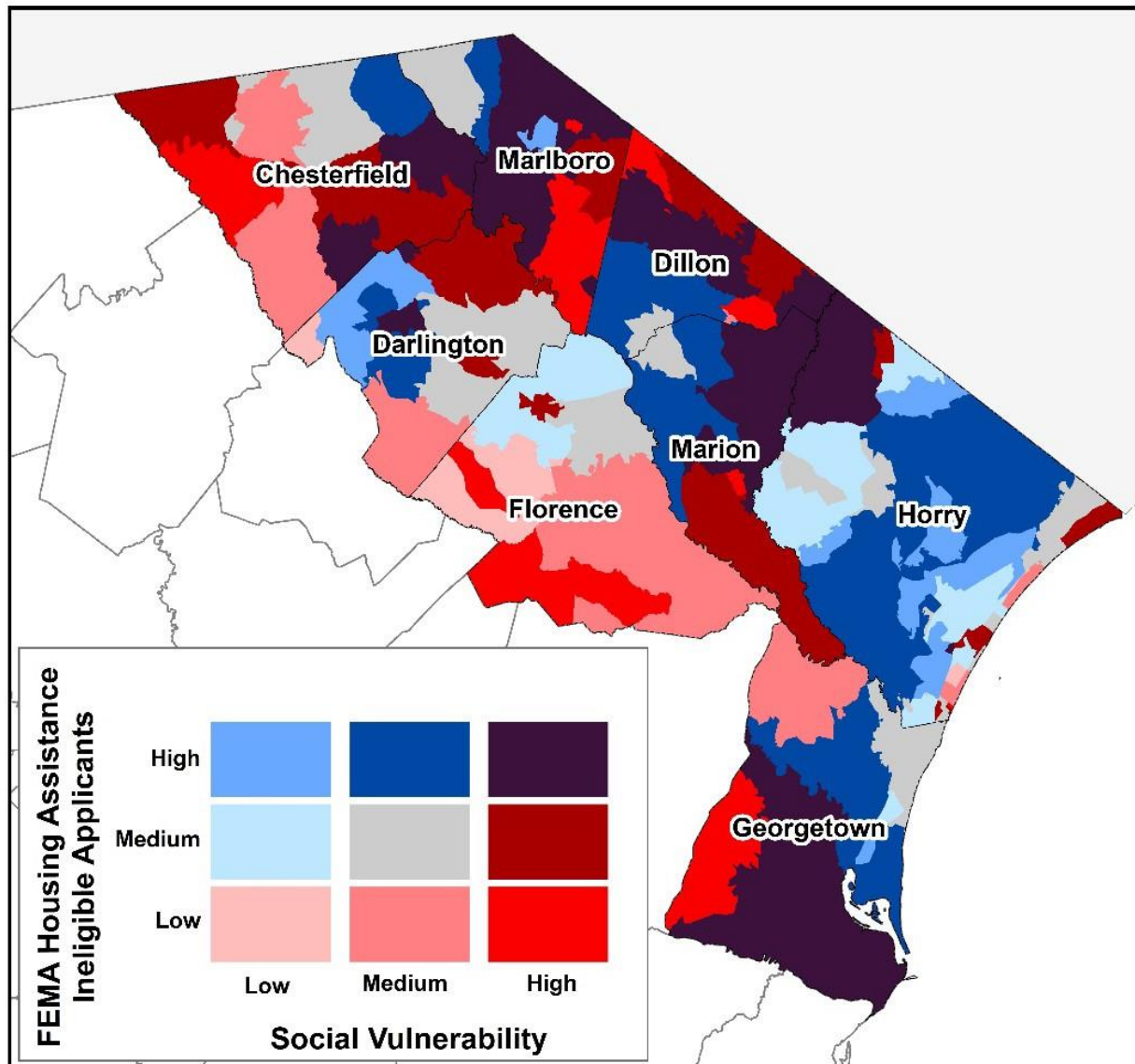


Figure 29. FEMA IA Ineligible Applicants in Relation to the Social Vulnerability Index.

Housing Impact Methodology

Utilizing best available data, the current unmet need for housing in South Carolina following Hurricane Florence has been calculated by accounting for losses from multiple datasets, including FEMA's applicant data and SBA's home loan data. FEMA's Individuals and Households Program provides assistance for repairs and replacements that will make a home "habitable," whereas SBA awards loan funding for the full cost to restore a home. This difference between programs is important because it highlights a need to move beyond FEMA's initial and large-scale assessment and include specifics on housing losses only available from SBA.

HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. However, because complete data sources are often difficult to obtain after a major disaster event, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home. Recent unmet needs assessments have used "the average real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable."⁴⁶

Multiple recently approved impact assessment methodologies have utilized the SBA estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance (NFIP) data in combination with each other to triangulate the real need as opposed to relying only on FEMA verified losses alone.⁴⁷ Historically, SBA verified disaster-damaged property through on-site inspections by construction analysts who estimated the cost to restore property to its pre-disaster condition; however, since 2017, SBA has used a desktop loss verification process to improve processing times for disaster loan applications.⁴⁸ The desktop loss verification process uses an initial loss verification followed by a post desktop review, wherein total damage estimates use a FEMA on-site inspection report for loans under \$25,000; for loans greater than \$25,000, SBA deploys loss verifiers for site inspections to confirm property loss estimates and to capture a more comprehensive cost of repair/replacement in comparison to FEMA's focus essential living areas.⁴⁹ Thus, SBA damage estimates provide a more comprehensive look at recovery than simply looking at FEMA inspected damage. Also, this assessment further accounts for underrepresentation of impacted populations stemming from FEMA ineligible applicants and provides a more accurate accounting of overall housing impact across a study area.

⁴⁶ Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013

⁴⁷http://www.cdbg-dr.pr.gov/wp-content/uploads/ponencias/Puerto_Rico_Action_Plan_Public_for_Comment.pdf,
<http://www.floridajobs.org/docs/default-source/2015-community-development/community-revitalization/dr/hcpafloridaactionplanhudapproved.pdf?sfvrsn=2>,
<http://www.floridajobs.org/docs/default-source/community-development-files/2018-state-of-florida-cdbg-dr-action-plan-draft.pdf?sfvrsn=2>,
<https://www.scdr.sc.gov/wp-content/uploads/2017/12/SC-Severe-Storm-Amendment-4-1-1-18-.pdf>,
<https://www.scdr.sc.gov/wp-content/uploads/2017/12/SC-Hurricane-Matthew-Action-Plan-Amendment-2.pdf>

⁴⁸ <https://www.sba.gov/sites/default/files/oig/SBA-OIG-Report-19-23.pdf>

⁴⁹ <https://www.fema.gov/news-release/2012/12/18/fema-housing-assistance-based-damage-essential-living-areas>

Specifically, for South Carolina, FEMA real property loss estimates are significantly lower than SBA property loss estimates across the Hurricane Florence impact area. The average FEMA real property loss for Florence (

Table 24) was \$3,792 based on 8,094 applicants with FEMA verified losses. SBA average verified losses per household were valued at \$39,378 based on 1,560 applicants and represent a 10.4 times higher verified loss amount than FEMA. SBA median loss value of \$25,501 is 38.8 times higher than FEMA's value of \$658. SBA's average verified personal property losses of \$15,482 per applicant are 8.7 times higher than FEMA's Other Needs Assistance (ONA) payouts of \$1,774 per applicant.

Table 24: FEMA and SBA Damage Estimates

Program	Property Loss (FEMA) (FEMA – Real Property Verified Loss; SBA – Verified Real Estate Damage)				Personal Property Loss (FEMA - Other Needs Assistance; SBA – Verified Contents Damage)			
	Count	Total	Average	Median	Count	Total	Average	Median
FEMA Individual Assistance	8,094	\$30,689,629	\$3,792	\$658	1,704	\$3,023,513	\$1,774	634
SBA Disaster Home Loan Program	1,560	\$61,429,359	\$39,378	\$25,501	1,181	\$18,284,268	\$15,482	\$9,520

Furthermore, matching FEMA's applicant data with SBA's loan data on FEMA registrant numbers for more than 8,500 applicants highlighted two other important facts utilized in identifying housing unmet needs. First, FEMA underestimates the number (count) of owner-occupied housing units with real property losses. Specifically, 3.2% of matching records (disaster victims) had \$0 FEMA real property losses but greater than \$0 SBA verified property losses. Second, FEMA underestimates and under supports the number (count) of rental-occupied housing units with personal property losses. Specifically, 6.7% of matching records had \$0 FEMA other needs assistance but greater than \$0 SBA verified contents losses.

Several considerations are factored in to arrive at a more comprehensive picture for this estimated unmet need. First, applying the average SBA verified loss amount (\$39,378) of all SBA applicants with real property losses (1,560) to those who were disqualified or turned down for SBA loan assistance and those for whom a FEMA loss was established would push the full extent of housing impact caused by Hurricane Florence to more than \$1.5 Billion (before accounting for an increase in rebuilding for resilience or deductions for funds already provided). Utilizing the median SBA real property damage amount of \$25,501 accounts for outliers in the SBA data (a few very high and very low damage amounts) driving the average SBA loss up. Applying the median SBA property loss amount of \$25,501 to the total number of SBA applicants who did not have a verified loss estimated, in conjunction with the Florence-specific rebuilding cost, outlined in federal register language,⁵⁰ provides a more complete estimate of unmet housing needs for those without a determined real property loss, provides a more conservative and realistic view of

⁵⁰https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561

losses to residential property across the Florence impact area. Utilizing the unmet needs values from HUD discussed below, and FEMA data about the number of applicants (more than 16,000) results in an unadjusted housing impact of nearly \$600,000,000. Methods for creating housing impacts and unmet needs are discussed below.

Housing impacts for this needs assessment were calculated using SBA data in conjunction with FEMA applicant information. We begin (Table 25) by utilizing the known real property (repair) losses from SBA for the 1,560 applicants for which this value is determined (A). Included here are also an estimate (B) of losses for those SBA applicants without an SBA real estate verified loss. Combined, these SBA derived losses are more than \$266 million (C).

Table 25. SBA Verified Losses

Id	Line Item	Count	Value
A	SBA applicants with a real estate verified loss	1,560	\$61,429,359
B	SBA applicants without a real estate verified Loss (Estimate)	8,043	\$205,104,543
C	Total verified loss of SBA Applicants (Estimate)	9,603	\$266,533,902

A more nuanced approach is required to account for FEMA non-renter (owner or “not specified”) applicants who are not represented by SBA data alone. Here, “not specified,” non-renter populations are those who have neither indicated ownership nor renter status when applying for FEMA Individual Assistance support. First, all FEMA applicant real property losses were categorized based on HUD’s definitions of damage levels (Minor-Low to Severe) shown in

Table 26. Utilizing loss value cutoffs and rebuild cost estimates provided in the federal register can provide a clearer understanding of losses across the Presidentially declared individual assistance counties.⁵¹

Table 26: HUD defined damage categories based on real property losses

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

⁵¹ https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561

<i>Severe</i>	Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.
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Table 27 shows the breakdown of estimated losses to those not accounted for in SBA’s loan dataset. Rows (A – E) represent owner losses by HUD classified Minor-Low to Severe damage level categories for those owner applicants with FEMA personal property verified losses but without FEMA real property verified losses. Here, FEMA real property verified losses were classified into updated HUD designated unmet needs categories outlined in the federal register (

Table 26).⁵² HUD guidance outlines the process of determining repair costs by damage category as:

“The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster.”⁵³

Following this guidance, total damage estimates for each federal register specified damage category was derived by combining FEMA and SBA data based on FEMA registrant ID and identifying SBA’s median home loan for rebuild/replace/relocate (

Table 28). An estimate of additional potential un-met needs populations (J) was generated by first multiplying the sum total of owner applicants without a real property loss (F) by 3.2% (accounting for FEMA’s missing real property losses compared to SBA’s) and summing the result with the number of SBA applicants without a FEMA registrant number (G). This potential unmet need applicant count (H) is then multiplied by the median SBA property loss value (\$25,501) (I) to create an estimated loss for all homeowner applicants (J). Estimated total losses of \$480 Million (K) to homeowners is derived by summing this value (J) with losses from SBA data alone and including additional costs associated with increased resilience of 30% (

Table 26, Line E).

Table 27: Estimated Damage to Owner Applicant Dwellings

Id		Line Item	Count	Value
A	B	FEMA “owner” or “non-specified” applicants in HUD <i>Minor-Low</i> damage category	6,066	\$96,861,888
		FEMA “owner” or “non-specified” applicants in HUD <i>Minor-High</i> damage category	679	\$21,365,075

⁵² <https://www.gpo.gov/fdsys/pkg/FR-2018-08-14/pdf/2018-17365.pdf>

⁵³ https://files.hudexchange.info/resources/documents/FR-6182-N-01-Allocation-Notice-CDBG-DR-Grantees.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=01e5f52f10-EMAIL_CAMPAIGN_2020_01_17_10_30&utm_medium=email&utm_term=0_f32b935a5f-01e5f52f10-19420561, Page 35

C	FEMA “owner” or “non-specified” applicants in HUD <i>Major-Low</i> damage category	616	\$31,896,480
D	FEMA “owner” or “non-specified” applicants in HUD <i>Major-High</i> damage category	586	\$43,448,091
E	FEMA “owner” or “non-specified” applicants in HUD <i>Severe</i> damage category	129	\$12,586,917
F	Total owner or "not specified" applicants without a FEMA Verified Property Loss	4,405	
G	Number (count) of SBA Applicants without a FEMA Registrant ID	160	
H	Potential additional unmet need population	301	\$7,682,365
I	Median verified loss		\$25,501
J	Losses of FEMA applicants not represented by SBA data (Estimate)	8,377	\$213,840,815
K	Total verified loss of all homeowner applicants across FEMA and SBA (Estimate)		\$480,374,717

Table 28: HUD and estimated unmet needs based on real property derived damage category

Category of Real Property Damage	Count of Owner or “Other” Applicants with FEMA verified Real Property Losses	Count of Renter Applicants with FEMA verified Personal Property Losses	SBA Derived Repair Costs (HUD Method)
<i>Minor Low</i>	6,066	438	\$15,968
<i>Minor High</i>	679	57	\$31,466
<i>Major Low</i>	616	57	\$51,780
<i>Major High</i>	586	76	\$74,144
<i>Severe</i>	129	7	\$97,573
<i>No Damage Indicated</i>	4,405	3,721	\$16,383

A similar method as above was utilized to capture impacts to affected renter applicants (

Table 30). Damage categories for renter occupied units were derived using a similar method applied only to personal property impacts as determined by receipt of FEMA Other Needs Assistance (ONA) (Table 29). Impacts and support for personal property are used in the case of renter applicants because FEMA does not inspect rental units for real property damage.⁵⁴ Lines A-E represent a break- down of renter losses by HUD classified Minor-Low to Severe damage levels for those applicants who have received FEMA ONA but without FEMA real property verified losses. Here, FEMA Other Needs Assistance values were classified into HUD designated categories based on federal registry classifications. Damage estimates were derived by multiplying counts of applicants (by damage category) by HUD provided estimates (Table 28). An estimate of potential unmet needs populations (H) was generated by multiplying the total renter applicants without either personal property loss (F) by 6.77% (accounting for FEMA’s \$0 ONA compared to SBA’s > \$0 contents losses) and subtracting a count of SBA applicants who received funds to support

⁵⁴ Counts of damaged units are likely conservative because applicant level flood depth information was not utilized in this assessment.

rental repair (G). This potential unmet need applicant count is then multiplied by the median SBA property loss value (I) and summed with values (A-E) to create an estimated loss for all home renter applicants (J).

Table 29: Renter-Occupied Personal Property Damage Categories and Values

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

Table 30: Estimated Damage to Renter Applicant Dwellings

<i>Id</i>	Line Item	Count	Value
<i>A</i>	FEMA “Renter” applicants in HUD <i>Minor-Low</i> damage category (SBA Multiplier)	438	\$6,993,984
<i>B</i>	FEMA “Renter” applicants in HUD <i>Minor-High</i> damage category (SBA Multiplier)	57	\$1,793,534
<i>C</i>	FEMA “Renter” applicants in HUD <i>Major-Low</i> damage category (SBA Multiplier)	57	\$2,961,460
<i>D</i>	FEMA “Renter” applicants in HUD <i>Major-High</i> damage category (SBA Multiplier)	76	\$5,634,906
<i>E</i>	FEMA “Renter” applicants in HUD <i>Severe</i> damage category (SBA Multiplier)	7	\$683,011
<i>F</i>	Total renter applicants without a FEMA Verified Personal Property (Contents) Loss	3,721	
<i>G</i>	Total SBA business applicants with verified repair, reconstruction, or relocation losses (rental NAICS code)	48	\$1,758,467
<i>H</i>	Potential additional unmet need population	204	\$5,202,204
<i>I</i>	Average verified loss		\$25,501
<i>J</i>	Total verified loss of rental property (Estimated)		\$25,017,566

Next, damages cataloged by other sources outside of SBA and FEMA are accounted for in

Table 31. Included here are preliminary public housing damage estimates⁵⁵ (A), insured residential damages (B), and private flood insurance damages (C) from the South Carolina Department of Insurance.⁵⁶

Table 31: Other Housing Damages

Id	Line Item	Count	Value
A	Real estate damage to public housing	32	\$ 816,032
B	Insured Damage - Domestic and Foreign Residential Property	19,205	\$71,626,171
C	Insured Damage - Private Flood	190	\$21,520,039

Totaling across all areas reveals total housing losses of at least \$598.5 million. Accounting for 30% in additional costs associated with necessary resilience measures such as more stringent building codes, cost of compliance measures, elevations or freeboard requirements, increases the total estimate of damages to more than \$779 Million (Table 32).

Table 32: Total Estimated Losses

Total Housing Verified Loss	\$ 599,354,525
<i>Accounting for 30% resilience costs</i>	\$ 779,160,883

Accounting for insurance, loans and other recovery resources, Table 33 depicts the total benefit provided to Hurricane Florence victims to date. Here, more than \$201 million across federal, state and local resources have been provided. Unfortunately, recovery funds provided to date still leave a large unmet housing need of greater than \$577 Million (Table 34).

Table 33: Sources and amounts of recovery funds (to date)

Id	Service	Count	Value
A	FEMA housing assistance payments	4,438	\$21,647,384
B	SBA home loan current manufactured housing payments	222	\$4,351,400
C	SBA home loan current real estate repair payments	823	\$21,195,337
D	SBA home loan current relocation payments	14	\$1,073,200
E	SBA home loan current reconstruction payments	8	\$806,900
F	SBA business loan payments to landlords	25	\$817,300
G	NFIP building payments	1,240	\$88,991,477
H	Public housing funds	32	816,032
I	Insurance Payment (Residential)	10,237	\$47,169,493
J	Private Insurance Flood Payments	71	\$13,702,120
K	ONE SC Philanthropic Fund		1,055,000

⁵⁵ Note: The public housing damage estimates are in the initial phases and are likely to rise as the formal loss assessments are completed.

⁵⁶ <https://doi.sc.gov/DocumentCenter/View/11376/2018-Status-Report-on-the-South-Carolina-Coastal-Property-Insurance-Market>

L	Total Benefit		\$201,625,643
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Table 34: Unmet Housing need for South Carolina

Total Unmet Housing Need to Pre-Storm Standards	\$397,728,882
<i>Accounting for 30% resilience costs</i>	\$577,290,430

Infrastructure Impact

Infrastructure systems affected by Hurricane Florence included damage to dams, roadways, bridges, wastewater treatment systems, drinking water treatment and collection systems, as well as the State's beaches, parks, and other recreational areas. The immediate recovery efforts were well-documented by the RSS and by the initial project worksheets being submitted for Public Assistance.

Dams

The South Carolina Department of Health and Environmental Control (SCDHEC) and U.S. Army Corps of Engineers conducted more than 264 post-storm assessments and confirmed that 11 dams in five counties had severe storm damage from Hurricane Florence.^{57,58} Many of these dams were constructed prior to any standards and permitting review, and now they 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. None of the 11 dams required emergency repairs following inspection.

Roads and Bridges

Widespread severe flooding and debris damage from Hurricane Florence caused a peak closure of about 233 roads and bridges throughout the state by Sept. 17, 2018, including the temporary closure of Interstate 95 and suspension of Amtrak rail service (Figure 30).⁵⁹ As floodwaters continued to rise, a peak of 56 bridges were closed by Sept. 21, 2018, with more than 90% of closed roads and bridges reopened by Oct. 31, 2018. By SCDOT's final event report Dec. 13, 2018, 234 repairs to transportation infrastructure were completed and another 39 were expected to be completed within 90 days; however, nine projects were expected to be completed in greater than 90 days, with most state-maintained roads functional.

⁵⁷ <https://www.scdhec.gov/sites/default/files/media/document/Post-Florence%202018%20-%20Dam%20Assessment.pdf>

⁵⁸ <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

⁵⁹ [http://info2.scdot.org/StormReports/Storm%20Reports/Hurricane%20Florence%20Report%20\(26-Sep-18%201600\).pdf](http://info2.scdot.org/StormReports/Storm%20Reports/Hurricane%20Florence%20Report%20(26-Sep-18%201600).pdf)

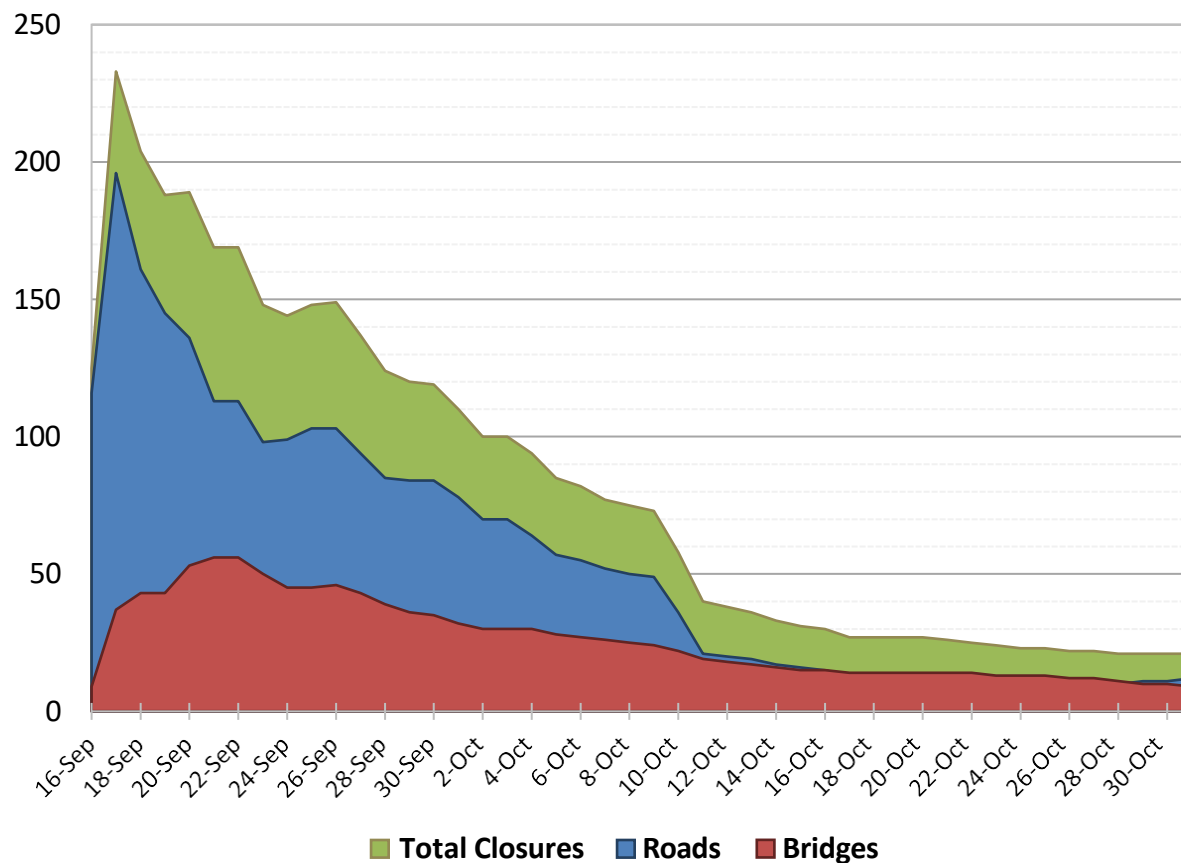


Figure 30. Daily road and bridge closures for South Carolina during and after Hurricane Florence.

Water and Wastewater Systems

Of the five water/wastewater treatment systems that experienced damage (electrical, roof damage, influent pump stations) there were no lengthy closures.⁶⁰ However, the Waccamaw River crested at more than 3 feet higher than it did during Hurricane Matthew in 2016, and the Conway Wastewater Treatment Plant was flooded and caused a discharge of untreated effluent into a tributary of the Waccamaw, leading the Department of Health and Environmental Control to issue a warning advising residents to avoid contact with the facility and its downstream waters.⁶¹ Though the Santee Cooper Grainger Station coal ash pit avoided damages, floodwaters came within inches of overtopping the temporary dam installed on levees for protection.⁶² Many drinking water systems were impacted when breaks to their distribution systems occurred. All systems were rapidly restored and remain operational. The State may address hurricane/flood damage actions for some plants through mitigation projects.

⁶⁰ FEMA OPEN Public Assistance Project Details report - <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

⁶¹ <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

⁶² <https://scdhec.gov/disaster-preparedness/hurricane-florence-2018/hurricane-florence-update-09-27-2018>

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 4394 identified \$4,917,729 and \$56,958,153 in public assistance for Category A (Debris removal) and Category B (Emergency protective measures), respectively (Table 35).

Additionally, the state has identified \$41,506,895 in public assistance need for Categories C-G (permanent repair) to date in the state-assessed counties (Table 36). These categories include:

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

Based on this data, and because applicants must prove where the 25% cost share will be covered from before any application is approved, the State should have no unmet need for public assistance projects. For the sake of understanding a potential, unprecedented worst-case scenario, if the counties were to have zero (\$0) matching funds for these projects, the residual between total project amount and federal share obligated would represent a potential unmet need of \$10,376,724 for identified infrastructure damage eligible under FEMA-PA Categories C-G (

Table 37).

Table 35. Public Assistance Category A and B totals by county.⁶³

County	Category A		Category B		Total (Category A & B)	
	Number of Projects	Cost of Projects	Number of Projects	Cost of Projects	Number of Projects	Cost of Projects
<i>Chesterfield</i>	5	\$310,274	8	\$300,659	13	\$610,933
<i>Colleton</i>	1	\$31,536	4	\$208,689	5	\$240,225
<i>Darlington</i>	3	\$120,680	10	\$390,926	13	\$511,606
<i>Dillon</i>	4	\$390,404	7	\$789,905	11	\$1,180,310
<i>Georgetown</i>	1	\$11,077	10	\$1,154,193	11	\$1,165,270
<i>Horry</i>	11	\$1,556,282	27	\$7,847,677	38	\$9,403,959
<i>Lancaster</i>	1	\$26,577	1	\$29,489	2	\$56,066
<i>Marion</i>	4	\$392,421	8	\$1,001,032	12	\$1,393,452
<i>Marlboro</i>	3	\$373,732	4	\$82,922	7	\$456,653
<i>Williamsburg</i>	5	\$1,700,583	24	\$44,531,447	29	\$46,232,029
<i>Statewide</i>	1	\$4,163	2	\$621,214	3	\$625,377

⁶³ <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

Grand Total	39	\$4,917,729	105	\$56,958,152	144	\$61,875,881
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Table 36. Public Assistance Categories C-G totals by county.⁶⁴

County	C - Roads and Bridges	D - Water Control Facilities	E - Public Buildings	F - Public Utilities	G - Recreational or Other	Grand Total
<i>Berkeley</i>		\$16,774	\$189,414	\$5,441,919		\$5,648,107
<i>Chesterfield</i>	\$1,514,555	\$59,850	\$56,583	\$1,844,525		\$3,475,514
<i>Darlington</i>	\$48,111	\$59,761	\$59,859	\$1,348,718		\$1,516,449
<i>Dillon</i>	\$147,350		\$164,015	\$155,664		\$467,030
<i>Florence</i>	\$21,257		\$198,505			\$219,762
<i>Georgetown</i>	\$212,440		\$381,035	\$27,485	\$67,837	\$688,797
<i>Horry</i>	\$619,331		\$4,159,121	\$5,962,552	\$5,361,192	\$16,102,196
<i>Lancaster</i>	\$49,480				\$17,043	\$66,523
<i>Marion</i>	\$4,399,897	\$145,470	\$168,407		\$308,763	\$5,022,537
<i>Marlboro</i>	\$379,943		\$56,166	\$1,329,037	\$140,833	\$1,905,979
<i>Statewide</i>	\$4,322,676		\$419,185	\$1,411,521	\$148,428	\$6,301,811
<i>Williamsburg</i>	\$92,190					\$92,190
Total	\$11,807,231	\$281,855	\$5,852,290	\$17,521,424	\$6,044,096	\$41,506,895

Table 37. Potential infrastructure unmet need

County	Grand Total	Total Federal Obligation	Residual (Potential Unmet Need)
<i>Berkeley</i>	\$5,648,107	\$4,236,080	\$1,412,027
<i>Chesterfield</i>	\$3,475,514	\$2,606,635	\$868,878
<i>Darlington</i>	\$1,516,449	\$1,137,337	\$379,112
<i>Dillon</i>	\$467,030	\$350,272	\$116,757
<i>Florence</i>	\$219,762	\$164,822	\$54,941
<i>Georgetown</i>	\$688,797	\$516,598	\$172,199
<i>Horry</i>	\$16,102,196	\$12,076,647	\$4,025,549
<i>Lancaster</i>	\$66,523	\$49,892	\$16,631
<i>Marion</i>	\$5,022,537	\$3,766,903	\$1,255,634
<i>Marlboro</i>	\$1,905,979	\$1,429,484	\$476,495
<i>Statewide</i>	\$6,301,811	\$4,726,358	\$1,575,453
<i>Williamsburg</i>	\$92,190	\$69,143	\$23,048
Total	\$41,506,895	\$31,130,172	\$10,376,724

⁶⁴ <https://www.fema.gov/openfema-dataset-public-assistance-funded-projects-details-v1>

HMGP and Resilience

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

“Federal funding under the HMGP is available following a major disaster declaration if requested by the Governor. HMGP funding is allocated using a “sliding scale” formula based on the percentage of funds spent on Public and Individual Assistance for each Presidentially declared disaster. For States with a FEMA-approved Standard State Mitigation Plan, the formula provides for up to 15% of the first \$2 billion of estimated aggregate amounts of disaster assistance, up to 10% for amounts between \$2 billion and \$10 billion, and 7.5% for amounts between \$10 billion and \$35.333 billion. For States with a FEMA-approved Enhanced Mitigation Plan, up to 20% of the total of Public and Individual Assistance funds authorized for the disaster (up to \$35.333 billion of such assistance) are available.”⁶⁵

Because South Carolina currently has a FEMA-approved Standard State Hazard Mitigation Plan, the percentage of available HMGP funding should be calculated at 15% of the total amount of IA and PA allocated to a disaster event. As of Feb. 2, 2020, FEMA has allocated \$24,520,254.20 in Individual Assistance and \$88,981,747.80 in Public Assistance.⁶⁶ Therefore, the amount available for mitigation and resilience activities statewide will likely be between \$17 and \$18 million.

Then, calculating that HMGP assistance to any jurisdiction is capped at 75% of the identified need (the remaining 25% being a required local match), it can be assumed that jurisdictions will be required to provide between \$4M-\$5M 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.

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, is expected to receive an annual allocation of \$16,924,508 from HUD in 2020. Over \$11,724,508 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, \$1,000,000 for Neighborhood Revitalization, \$600,000 for Special Projects, \$600,000 Ready-to-Go and \$ 2,000,000 for Business Development.

Economic Impact

Business and Employment

HUD describes methods for determining serious unmet economic revitalization needs using a count of businesses falling within each of several damage categories (Table 38). The HUD method requires first, a calculation of damage to real-estate (repair, rebuild, relocate) and contents (machinery, furniture,

⁶⁵ https://www.fema.gov/media-library-data/1521210872717-2a5eb11ea35808dc1f0a4965b1e3944f/Hazard_Mitigation_Grant_Program_Pamphlet.pdf

⁶⁶ <https://www.fema.gov/disaster/4394>

inventory). Each SBA application is then classified into one of five categories based on this estimate of damage and the median damage for each category is produced from these groupings.

Table 38. Summary of SBA applicants based on Federal Register serious unmet economic needs.

HUD Cat	Damage	Count of all SBA Applicants	Median Damage	Percentage of All Businesses
Category 1	< \$12,000	40	\$6,026	2.40%
Category 2	\$12,000 - \$29,999	39	\$20,023	2.34%
Category 3	\$30,000 - \$64,999	34	\$41,276	2.04%
Category 4	\$65,000 - \$149,999	12	\$85,130	0.72%
Category 5	>= 150000	18	\$234,944	1.08%
No Category		1,527		91.44%

Then, a count of those SBA applicants who were either declined loan assistance or had applications in process at the time of the data collection⁶⁷ represents the unmet needs for the business community. These counts are multiplied by the median damage to gain perspective on possible unmet needs (Table 39). According to this method, serious unmet business needs for Hurricane Florence amount to \$2.1 million.

Table 39. Estimate of SBA applicants either denied a loan or in process based on Federal Register serious unmet economic needs.

HUD Cat	Damage	Count of all SBA Applicants	Median Loss	Federal Register Estimate of Unmet Need
Category 1	< \$12,000	12	\$6,026	\$72,312
Category 2	\$12,000 - \$29,999	17	\$20,023	\$340,391
Category 3	\$30,000 - \$64,999	7	\$41,276	\$288,932
Category 4	\$65,000 - \$149,999	6	\$85,130	\$510,780
Category 5	>= 150000	4	\$234,944	\$939,776
No Category		199		
Total Estimated Losses (FR Method)				\$2,152,191

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

As of Aug. 15, 2019, the Small Business Administration (SBA) issued \$3.5 million in Business and Economic Injury Disaster Loans (EIDL) to the state impacted area covered in this assessment.⁶⁸ Five counties (Chesterfield, Dillon, Horry, Marion, and Marlboro) had more than 100 SBA business loan applications, while Darlington, Florence, and Georgetown counties had 55 or fewer each (Table 40). Entities such as small businesses, small agricultural cooperatives, and most private nonprofit organizations

⁶⁷ Aug. 15, 2019

⁶⁸ SBA Business Application Report, Aug. 15, 2019

in disaster impacted areas may apply for low-interest EIDL loans to assist with operating expenses and working capital. The Business Physical Disaster Loss loans are available for machinery, equipment and other real-property damages.

Utilizing all SBA business data rather than a sub-set of declined businesses to understand the financial impact to livelihoods provides a more comprehensive understanding of impacts and recovery across the state. The Small Business Administration makes low cost disaster loans available to qualified businesses. A summary of SBA applicants (Table 40) shows that a majority of applications were never returned (1,275), were either withdrawn (93), declined (112) or were in process (153) for a business loan. Only 123 business loans had been approved as of the creation of this assessment. According to SBA business loan information, approximately 109 applicants had a verified property loss of \$6,267,050. The average verified loss for all applicants was \$57,496 and the median loss was \$28,137. Utilizing the general methodology put forth for the housing impact and unmet needs enables us to identify the true impact and possible extra estimated impacts for businesses who did not qualify for loans.

Table 40. Small Business Administration Applicants by County.

County	Number of SBA Applicants	Approved	Declined	In Process	Issued	Withdrawn
Chesterfield	131	9	5	6	104	7
Darlington	47	2	11	3	30	1
Dillon	232	19	13	15	170	15
Florence	31	1	4	1	23	2
Georgetown	55	1	3	5	41	5
Horry	938	81	55	98	653	51
Marion	178	3	15	10	142	8
Marlboro	144	7	6	15	112	4
Total	1,756 ⁶⁹	123	112	153	1,275	93

Table 41 outlines the impacts, estimated impacts and support provided by the SBA to business owners across the impacted counties. Here, we capture the total real property loss of \$50,222,860 by summing verified repair losses (A) with verified reconstruction losses (C) and estimated repair (B) and reconstruction losses (D). Here, estimated repair losses are calculated by multiplying the median repair cost by the number of applicants who did not have an SBA verified loss. Estimated reconstruction losses are calculated as the product of the median reconstruction loss and the estimated number of applicants who would fall into this category (the product of the ratio of applicants within a category and those with no damage estimate). In this case, 1 applicant with reconstruction loss out of 109 applicants with any loss = .009 multiplied by the total applicants without a loss estimate (1,560).

⁶⁹ There are 1,669 unique applicants to the SBA program

Next we use the same method to sum the verified and estimated losses to furniture (F and G), machinery (H and I), inventory (J and K) and business operating expenses (L and M) resulting in a total estimated operational loss to \$26,329,515 to businesses. According to this method, total business impacts from Florence was \$76,552,375. When accounting for resilience requirements (30% increase in rebuilding but not operations) the total impact to businesses in South Carolina was \$91,619,233. SBA payouts to businesses totaled \$5,342,600 for these lines of loss, leaving a potential unmet need of **\$86,276,663**.

Table 41. SBA Derived Impact and Unmet needs for businesses.

Small Business Administration Verified Business Property Loss of All SBA Applicants			
		Count	Value
A	SBA applicants with a real estate verified loss (Repairs)	109	\$6,267,050
B	SBA applicants without a real estate verified loss (Repair Estimate)	1,560	\$43,893,720
C	SBA verified reconstruction loss (Rebuild)	1	\$4,055
D	Estimated reconstruction loss (Rebuild)		\$58,035
E	Total real estate losses for businesses referred to SBA (Estimate)		\$50,222,860
Small Business Administration Verified (and Estimated) Business Operating Loss of All SBA Applicants			
F	Verified furniture loss	44	\$561,142
G	Furniture Loss (Estimate)	630	\$2,752,212
H	Verified machinery loss	61	\$1,464,053
I	Machinery loss (Estimate)	873	\$3,897,195
J	Verified inventory loss	31	\$1,666,348
K	Inventory Loss (Estimate)	444	\$2,440,183
L	Verified EIDL Loss	53	\$2,170,400
M	EIDL Loss (Estimate)	759	\$11,377,982
N	Sum of operational losses		\$26,329,515
O	Total verified loss for all businesses (Estimate)		\$76,552,375
P	Accounting for 30% resilience addition		\$91,619,233
Duplication of Benefits			
Q	SBA repair payments	42	\$2,575,200
R	SBA furniture payments	14	\$162,700
S	SBA machinery payments	21	\$274,200
T	SBA inventory payments	14	\$160,100
U	SBA EIDL payments	53	\$2,170,400
V	Total Benefit		\$5,342,600
Overall Business Unmet Needs			
W	Total unmet business repair/replace estimate		\$47,647,660

X	Total unmet business operation estimate		\$23,562,115
Y	Total unmet business needs estimate		\$71,209,775
Z	Accounting for 30% resilience addition		\$86,276,633

Disaster Unemployment Assistance

Disaster Unemployment Assistance (DUA) is managed by the South Carolina Department of Employment and Workforce (DEW). DEW explains that “The DUA program makes funds available to assist people who became unemployed as a direct result of Hurricane Florence.”⁷⁰ Applications for DUA assistance must have been filed by Nov. 24, 2018, depending on county (within 30 days after the available assistance was announced). The following (Table 42) shows the number of weeks and amount of DUA claims paid out for each county area.

Table 42. Disaster Unemployment Assistance Provided by Florence Impacted Counties.

County	Total Weeks Paid by County	Total Amount Paid by County	Average Amount Paid by County
Chesterfield	3	\$439.00	\$146.33
Darlington	1	\$206.00	\$206.00
Dillon	88	\$12,225.00	\$138.92
Florence	58	\$9399.00	\$162.05
Georgetown	124	\$21,664.00	\$174.71
Horry	1,461	\$242,751.00	\$166.15
Marion	139	\$22,092.00	\$158.94
Marlboro	17	\$2460.00	\$144.71
Total	1,891	\$311,236	\$164.59

⁷⁰ <https://dew.sc.gov/news-details-page/2018/09/25/disaster-unemployment-assistance-available-for-four-counties-affected-by-hurricane-florence>

Unmet Needs Summary

Damages and unmet needs from hurricane Florence to housing, infrastructure and economy were identified in this assessment with housing impacts and associated unmet needs standing out among these three categories. Hurricane Florence's substantial damage to housing across the impacted counties (\$779 million) accounts for 85% of total estimated losses in comparison to the economic sector (\$92 million) or 10% of estimated total losses and the infrastructure sector (\$42 million) or 10% of total losses (Figure 31A). After accounting for available recovery resources, housing sector overall percentage of unmet need increases slightly in comparison to the infrastructure and economic sectors (Figure 31B).

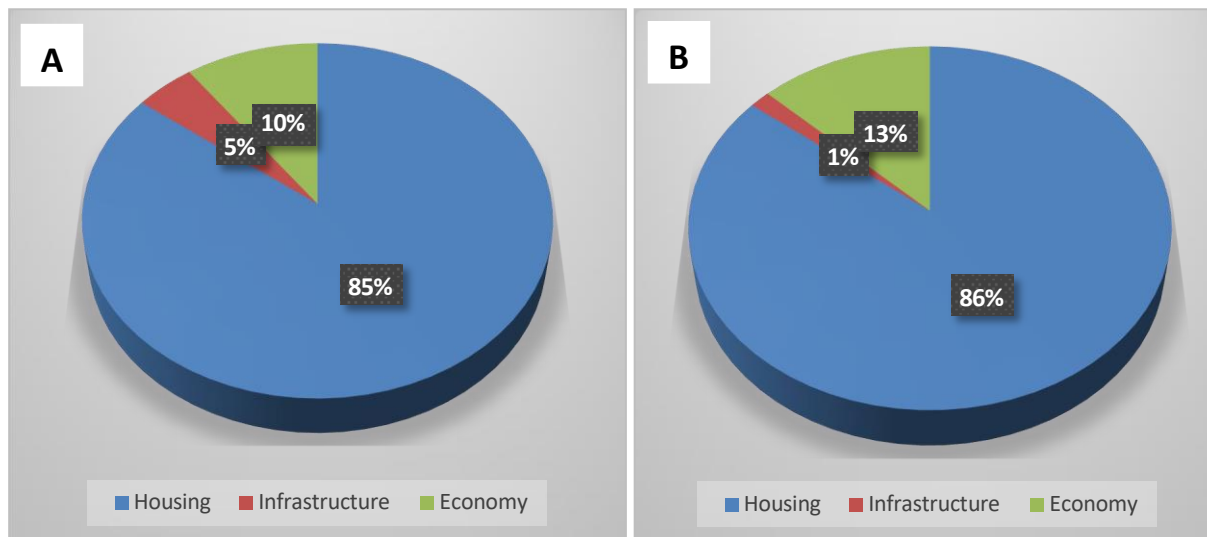


Figure 31. A: Estimated losses by sector as a percentage of total losses, and B: Estimated unmet need.

Total housing unmet needs are \$577 million, while unmet business needs were just over \$85 million and estimated infrastructure unmet needs are just over \$10 million. Within the housing impacted populations are both a high number of single-family residential units and a sizeable renter population. Recovery programs aimed at these two groups should have high return and lead to substantial progress in overall recovery from the storm. Additionally, a continued focus on home buyouts aimed at managed retreat from hazard zones will pay dividends into the future. Specifically, removing at risk structures from flood zones will help residents be more resilient in future flood disasters.

ACTION PLAN

Funding Priorities

When the emergency declaration was issued for South Carolina, 19 counties were designated for Federal Emergency Management Agency (FEMA) Public Assistance and eight counties were designated for FEMA Individual Assistance. Public Assistance provided grants to governmental units for emergency infrastructure repairs and debris removal⁷¹. Individual Assistance provided emergency funding to individuals for immediate housing and safety needs⁷². The declaration for Hurricane Florence in South Carolina, designated as FEMA DR-4394, included the following counties:

County	Individual Assistance	Public Assistance
<i>Berkeley</i>		Declared
<i>Calhoun</i>		Declared
<i>Charleston</i>		Declared
<i>Chesterfield</i>	Declared	Declared
<i>Clarendon</i>		Declared
<i>Colleton</i>		Declared
<i>Darlington</i>	Declared	Declared
<i>Dillon</i>	Declared	Declared
<i>Dorchester</i>		Declared
<i>Florence</i>	Declared	Declared
<i>Georgetown</i>	Declared	Declared
<i>Horry</i>	Declared	Declared
<i>Jasper</i>		Declared
<i>Lancaster</i>		Declared
<i>Marion</i>	Declared	Declared
<i>Marlboro</i>	Declared	Declared
<i>Orangeburg</i>		Declared
<i>Sumter</i>		Declared
<i>Williamsburg</i>		Declared
Total	8	19

Counties Eligible for Assistance

The South Carolina Disaster Recovery Office (SCDRO), administered by the State of South Carolina through the Department of Administration, will provide assistance to eligible applicants in the following 8 Individual Assistance declared counties only:

Chesterfield
Georgetown

Darlington
Horry

Dillon
Marion

Florence
Marlboro

⁷¹ For details on the FEMA PA program see: <https://www.fema.gov/media-library-data/1465341338231-1ae3d3ccc360573d965b70090ca01033/FactSheetPA2016.pdf>

⁷² For details on the FEMA IA program see: https://www.fema.gov/media-library-data/1461689021638-cfcfd7f6c263635802fa7a76a19e00ea/FS001_What_is_Individual_Assistance_508.pdf

HUD has provided the State of South Carolina with \$72,075,000 in disaster recovery funds to assist in recovery from the Hurricane. HUD has further stipulated that 80% of the efforts must address unmet needs of Marion and Horry Counties and zip code 29536 in Dillon County.

The State partnered with Disaster Metrics to assess the unmet needs of South Carolina as a result of Hurricane Florence.

Disaster Metrics performed a comprehensive Unmet Needs Assessment, identifying the needs across three sectors: housing, the economy and infrastructure. When comparing these three sectors, it becomes clear that the greatest unmet need exists in the housing sector. As a result of this analysis, Governor Henry McMaster directed SCDRO to focus exclusively on addressing the unmet housing needs of the most vulnerable homeowners of South Carolina who were affected by Hurricane Florence. SCDRO will accomplish this goal through the housing programs focusing on single family home repair and replacement and strategic buyouts. SCDRO will not provide funding for public services, Public Housing Authorities (PHAs), emergency shelters, multifamily, or housing to meet the needs of pre-disaster homeless persons. SCDRO will not provide funding for public services because they are not necessary activities when addressing unmet housing needs. SCDRO will not provide funding for PHAs because no unmet needs for PHAs exists. Statewide, there are approximately 32 section 8 participants who were in some way impacted by Hurricane Florence. Fortunately, all of these units were repaired in June/July 2019 and all residents were invited to re-inhabit units. Therefore, no unmet needs for section 8 Housing Choice Voucher Program units exist and SCDRO will not provide funding for the rehabilitation, reconstruction, or replacement of such units.

SCDRO has not received information identifying an unmet need for a physical or structural homeless, transitional, or supportive facility as a direct result from the disaster. No entity or local government has identified a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities as a result of Hurricane Florence. As the State continues to work on recovery efforts, and continues planning activities for future disasters, it will continue to reach out to public housing authorities, owners/operators of HUD-assisted housing, homeless service and shelter providers, as well as the owners and managers of both transitional and permanent housing for the homeless in order to address any newly identified unmet needs that may arise. Therefore, no funds will be expended on the transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are homeless and at-risk of homelessness, or the special needs of persons who are not homeless but require supportive housing (e.g., elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents).

Limited rental repair funds will be available for the Most Impacted and Distressed Counties as designated by HUD.

By analyzing a number of social vulnerability factors, Disaster Metrics was able to empirically identify the most socially vulnerable census tracts within each FEMA Individual Assistance 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 hurricanes), shocks and stresses.

Utilizing social vulnerability information combined with FEMA damage data provides a standardized, replicable, and pragmatic process for finding and understanding people and places where scarce resources would be most helpful in driving successful disaster recovery.

The State uses the FEMA verified loss information and social vulnerability analysis as an assessment and targeting tool. It allows the State to find the most vulnerable citizens. These are the citizens who are the least likely or able to run away from a disaster. They are the citizens who are the least likely to have the ability to recover without help. These tools allow the State to focus the recovery efforts. The State will use this information as part of a holistic recovery approach. This approach will allow the State to direct the implementation vendor to locations where intake centers can have the greatest chance of assisting large populations of impacted citizens. Targeting support to these areas in the immediate and long-term recovery phases of the disaster will yield the best outcomes for those with the highest need, particularly focused on areas of racial, ethnic and low-income concentrations.

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 ensure that assistance is prioritized toward the most disadvantaged populations. South Carolina intends to spend a minimum of 70% of program funds on activities that benefit the Low-and-Moderate Income (LMI) population. LMI status is determined by evaluating income as a percentage of the Area Median Income (AMI) in the region in which the applicant lives.

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 Slum or Blight; or
- 3) Meeting Urgent Needs.

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 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 will use an analysis of social vulnerability factors to focus efforts to locate eligible citizens. Hurricane Florence assistance programs will begin by January 2021 and be completed by January 2027.

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.

While the development of a hazard mitigation plan is an allowable use for CDBG-DR funds, the SCDRO will not pursue this. The South Carolina Emergency Management Division has developed a comprehensive hazard mitigation plan. The plan is available at: <https://www.scemd.org/em-professionals/plans/hazard-mitigation-plan/>

Program Budget

The State will allocate all program dollars for housing recovery activities. The following is a table of budgeted categories:

Program	Initial Allocation
Single Family Housing Program	\$63,000,000
Buyout Program	\$3,000,000
Affordable Rental Program	\$1,000,000
Planning	\$1,471,250
Program Administration	\$3,603,750
TOTAL	\$72,075,000

Program funds administered by the State will be made available to applicants residing in the eight counties that were eligible for FEMA Individual Assistance funds. The eligible counties are:

Chesterfield
Georgetown

Darlington
Horry

Dillon
Marion

Florence
Marlboro

The planning funds will be used for general operational planning needs as well as to develop, maintain, and amend the Action Plan, policies and procedures, other necessary program documents, as needed. Any remaining planning funds will be made available to address unmet planning needs in the Most Impacted and Distressed Counties. HUD has further stipulated that at least 80% of the efforts must address unmet needs within the Most Impacted and Distressed (MID) areas of Marion and Horry Counties and the 29536 Zip Code of Dillon County. As allowed by the federal register notice, South Carolina will extend the MID designation to all of Dillon County for the purpose of the MID spending requirement.

Leveraging of Funds

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 Hurricane Florence. 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 Hazard Mitigation Grant Program
- SBA Disaster Loans
- National Flood Insurance Program payments
- Private insurance
- 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

Any funds received from these sources must be leveraged as a component of the repair or replacement unless they were already spent for their intended use.

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 the recovery funds toward the most evident need in the area of housing recovery.

To assist the most vulnerable families in their recovery efforts with the goal of protecting people and property from harm, 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. Reconstruction of disaster-damaged stick-built homes;
4. Consideration of limited relocation assistance on a case by case basis;
5. Affordable rental repair;
6. Buyouts; and
7. 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.

The State acknowledges that demand for incorporating mitigation and resiliency measures exists. The State has determined that the cost of incorporating these measures into the Housing Programs is prudent. South Carolina will implement construction methods that emphasize 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. Projects will be evaluated to determine adequate compliance with modern and resilient building codes and mitigation of hazard risk, including possible sea level rise, high winds, storm surge, and flooding.

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. 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.

For all new construction or for substantially rehabilitated structures, the State will require construction to meet ENERGY STAR certification standards and green building standards.

To the most practical extent feasible, the State will follow the HUD CPD Green Building Retrofit Checklist guidelines and apply them to 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 homes 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.

At all times, construction costs must remain reasonable and consistent with market costs at the time and place of construction. SCDRO uses the service of an Implementation Vendor to assist in determining that construction costs are reasonable and necessary and uses this data to conduct an evaluation of the cost or price of a product or service. The primary mechanism for these cost controls is the use of Xactimate, an industry standard construction cost estimating tool used by SCDRO and its Vendor to determine that construction costs are reasonable.

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

Prior to program-related construction, applicant awardees must submit any additional funds received for housing damage caused by the presidentially declared hurricane disaster to the State to avoid duplication of benefits. CDBG-DR funding must be the funding of last resort. Any additional funds paid to applicant awardees for the same purpose as the housing assistance award after the State has completed the repair, rehabilitation, or replacement of the applicant's housing units must be returned to the State of South Carolina.

Providing a home that is safe, sanitary and secure is the goal of the State's Housing Programs.

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 some 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 September 2018 presidentially declared hurricane 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 to prove that damage was caused by Hurricane Florence. 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 September 2018 hurricane disaster. If the State does not believe the damage was a result of the hurricane disaster, the citizen may be referred to a volunteer organization active in the disaster (VOAD) for assistance and resource coordination.

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 eight counties for which FEMA Individual Assistance was approved for the September 2018 presidentially declared hurricane disaster area.
- 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 of the following:
 - i. Proof of FEMA IA assistance;
 - ii. Federal income tax return showing their permanent home address;
 - iii. Government-issued identification issued prior to and expiring after impacted period; or
 - iv. Property tax homestead exemption.
 - b. By providing any two of the following:
 - i. Utility bills mailed to the property address;
 - ii. Vehicle registration or renewal at the address in the impacted period;
 - iii. Proof of government benefits received at least one month prior and one month after the impacted period; and
 - iv. Property insurance documents indicating the insured property as primary residence.
 - c. SCDRO may require an affidavit of primary residency under penalty of civil and criminal perjury which may be considered along with any other fact relating to primary residency.
- 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 three years after construction 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;⁷³
- Persons with documented disabilities; and
- Age-dependent household members at the time of disaster or at the end of the application intake period (aged 65 or older, or 17 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	81% AMI to 120% AMI
Applicant's Household Includes <i>Either</i> Age Dependent or Disabled	1st Priority	3rd Priority	5th Priority	7th Priority
Applicant's Household Includes Neither Age Dependent or Disabled	2nd Priority	4th Priority	6th Priority	8th Priority

The SCDRO is aware that the prioritization process defined in this plan remains in review under the context of the Age Discrimination Act. The policy is consistent with prior Action Plans and no changes are anticipated to be required as a result of that review. Once complete, should the review recommend any policy modifications, they will be considered as an amendment to this plan.

80% of the Hurricane Florence recovery efforts will be targeted to Dillon, Marion and Horry Counties since those counties have been designated by HUD as Most Impacted and Distressed (MID). Lower priority applicants in those counties may be served before higher priority applicants in other counties. For example, a fifth priority applicant in Marion County may be served before a first priority applicant that resides in Georgetown County, because a much larger portion of the program activities must go towards most impacted and distressed counties based on HUD requirements.

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;

⁷³ Applicants may review income limits for their household size by reviewing the table of income limits by county, available in the Appendix.

3. A review of funding from all sources to ensure no Duplication of Benefits (DOB); and
4. 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 SCDRO. SCDRO will hold those funds until the construction is complete. Once construction is satisfactorily completed, SCDRO will give the applicant's DOB funds to the Implementation Contractor.

The State of South Carolina will not provide funds to individual citizens. The purpose of the State's program is to repair or replace housing stock throughout the disaster affected area. To that end, the State will coordinate all construction activity being funded by the State's CDBG-DR allocation through the State's Implementation Contractor. The award maximums for each type of housing assistance are listed below:

- Single Family Housing unit (stick-built) repair/rehabilitation assistance awards: **up to \$50,000 in Housing Recovery Services;**
- **Manufactured Housing Unit (MHU) repair assistance awards – up to \$15,000 in Housing Recovery Services;**
- Single-wide Manufactured Housing Unit (MHU) replacement assistance awards – **up to \$90,000**
~~85,000~~ in Housing Recovery Services;
 - Exceptions to the cap for manufactured housing unit replacement are wheelchair-accessible units, portable storage containers, and septic system replacements;
- Double-wide Manufactured Housing Unit (MHU) replacement assistance awards – **up to \$105,000**
~~95,000~~ in Housing Recovery Services;
 - Exceptions to the cap for manufactured housing unit replacement are wheelchair-accessible units, portable storage containers, and septic system replacements;
- Modular or Stick-built Housing Unit replacement/substitution assistance awards – **up to \$175,000 in Housing Recovery Services;**
 - Exceptions to the cap for the reconstruction of a stick-built or modular home are wheelchair-accessible homes, portable storage containers, and septic system replacements; and
- Extremely limited temporary relocation assistance (case-by-case basis) for applicants in either single family stick-built or manufactured housing units– **up to \$5,000.**

The State's Implementation Contractor will conduct all construction activities. All construction work will be performed by contractors licensed by the State of South Carolina. All work must be completed to

standards that meet applicable building codes. SCDRO defines “not suitable for rehabilitation” as an estimated rehabilitation cost that exceeds the replacement cost for that structure type.

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 maximum awards. The State will use a Special Case Panel with members appointed by the SCDRO Program Management Director to evaluate and authorize projects that exceed the stated program limits.

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 disorders. 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.

A grantee of the State may choose to use pre-disaster value if 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.

VOAD Construction Activities

The State of South Carolina will procure an implementation contractor to execute the State’s housing programs. To expedite the delivery of assistance, the implementation contractor will be required to supplement construction activities using Volunteer Organizations Active in the Disaster (VOADs) at every possible opportunity. All VOADs that meet insurance and licensing requirements will be provided with the opportunity to complete housing projects that match their capabilities.

The implementation contractor will provide VOADs with a list of construction-ready projects within the operation area served by the VOAD. The VOAD will have the option to select a project that best matches their capabilities without penalty for declining any projects. All projects that are completed by VOADs are required to meet all the same standards and quality requirements as all other projects completed by the implementation contractor.

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 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 and Elevation

South Carolina will implement resilient home construction standards based on sound, sustainable long-term recovery planning. 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 % 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 % annual floodplain elevation utilizing the advisory base flood elevation.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are 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 rule, the State will not provide assistance for flood insurance. In cases of 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 total cost of the project, including elevation, must be cost effective when compared to different housing alternatives in order to promote long-term recovery. This demonstration of cost reasonableness will be documented by calculating the cost of elevation as compared to alternative solutions.

Nationally, the average cost to elevate an existing home is between \$30,000 and \$100,000. The average cost to elevate a home is dependent upon several factors including, but not limited to, the size of the home, the number of feet it must be elevated and the location of the home. The actual cost of elevating an existing structure (including elevation design, engineering, and other costs of elevation), must be cost reasonable when compared to the cost of a comparable elevated reconstruction home.

A review was conducted based on SCDRO's past Single Family Housing Programs for both the 2015 Storm Recovery and 2016 Hurricane Matthew Recovery Programs and it was concluded that the average cost to reconstruct and elevate a home was \$138,810.85.

Elevation costs will be reviewed on case-by-case basis by the Special Case Panel to ensure that the cost of elevating a home during the rehabilitation is reasonable.

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.

Assessing the Needs and Location of Vulnerable Populations

SCDRO commits to Affirmatively Furthering Fair Housing and complies with Civil Rights laws in the implementation of its programs. SCDRO further understands the complexity of housing resilience in racially and ethnically concentrated areas, as well as concentrated areas of poverty. SCDRO will coordinate with impacted stakeholders to determine the best course of action to provide equitable, meaningful housing solutions to best serve vulnerable populations as identified in the social vulnerability and demographic analysis. Before expending CDBG-DR funds, SCDRO will work to reach LMI and minority communities. Organizationally, SCDRO has sought staff and resources to ensure that vulnerable populations receive equitable and fair treatment.

Census Data

Counties	LMI Population	Total Population	% LMI (2005-2015 data)	Minority	Hispanic	LEP
Chesterfield	20,975	46,024	46.2%	39.4%	4.2%	1.7%
Darlington	27,615	67,253	41.4%	45.1%	2.0%	0.6%
Dillon	16,585	30,871	53.5%	54.2%	2.7%	1.7%
Florence	56,040	138,561	41.5%	47.8%	2.5%	0.8%
Georgetown	25,210	61,605	42%	36.3%	3.1%	0.7%
Horry	117,495	320,915	40.8%	94.0%	6.0%	1.5%
Marion	15,665	31,562	49%	61.4%	2.8%	0.4%
Marlboro	11,855	27,131	47.6%	60.8%	3.3%	0.2%

As a result of historic and structural racism, communities of color are disproportionately concentrated in low- and moderate-income (LMI) neighborhoods. SCDRO has taken additional steps to address extremely low-income individuals and households, defined as those which earn equal to or less than 30 percent of area median income, as well as individuals with disabilities and age dependencies by way of the Prioritization Matrix. Given these racial disparities in income across the impacted counties, it is particularly important to consider how this action plan affects LMI, very low-income, and extremely low-income communities. Low-income households have fewer resources to prepare for storms fewer resources to dedicate to storm recovery, putting them at still greater risk of continuing damage as

repairs are not made. Low-income households may also have less capacity to relocate during disasters. All these factors put these communities at risk for greater damage during Hurricane Florence and will continue to put them at risk in future storms. The SCDRO program is explicitly intended to assist the most vulnerable of South Carolina's citizens. These citizens, as HUD and SCDRO rightly recognize, face the greatest barriers to long-term recovery.

SCDRO is committed to rebuilding damaged communities in a more resilient manner that affirmatively furthers fair housing opportunities to all residents. For this reason, the social vulnerability and demographic analyses identify which impacted neighborhoods have a disproportionate concentration of minority populations as well as those with Limited English Proficiency. As these communities rebuild, the State will focus its planning and outreach efforts to ensure that rebuilding is equitable across all vulnerable neighborhoods, including making provisions for all information available about CDBG-DR funding and recovery programs available in both English and Spanish. SCDRO is committed to having appropriate translation, interpretation, and other services for persons with disabilities free of charge and accessible to the public in accordance with all HUD regulations and program guidelines.

When planning the distribution of funding for the Hurricane Florence recovery, SCDRO relied on historic knowledge of the disaster area to prioritize funding to single family owner-occupied housing. As evidenced by program participation in the 2015 and 2016 recovery operations (which overlap geographically with the Florence program), the applicant pool tends to be rural, low-income homeowners. SCDRO provided rental funds in the 2015 and 2016 recoveries for the provision of repairs to single-family affordable housing units. The two programs struggled to find viable properties to utilize the funds. In the 2015 program, only \$400,000 of the \$1 million allocated was expended on rental property repairs. In the 2016 program, no viable applicants were identified.

For Hurricane Florence, most of the rental property damage is concentrated in the Horry County area (2,111 applicants, or 50% of all FEMA IA rental applicants) in what is best described as short-term rental or vacation homes. These units will not comply with the requirements to maintain affordability status, given their usage as short-term rentals in a major tourist area. Therefore, funding has been prioritized to owner-occupied housing. If, during the intake period, SCDRO sees an increased demand for rental housing repairs, this plan will be amended to reallocate additional funds to the rental repair activity.

Buyout Program (MID Only)

Applicants applying for assistance must have suffered documented damage to their housing units as a result of the September 2018 presidentially declared hurricane 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 to prove that damage was caused by Hurricane Florence. 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 September 2018 hurricane disaster. If the State does not believe the damage was a result of the hurricane disaster, the citizen may be referred to a volunteer organization active in the disaster (VOAD) for assistance and resource coordination.

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

- Applicant must own and have occupied real property located within the Dillon, Horry, or Marion counties for which FEMA Individual Assistance was approved for the September 2018 presidentially declared hurricane disaster area.
- 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 of the following:
 - i. Proof of FEMA IA assistance;
 - ii. Federal income tax return showing their permanent home address,
 - iii. Government-issued identification issued prior to and expiring after impacted period; or
 - iv. Property tax homestead exemption.
 - b. By providing any two of the following:
 - v. Utility bills mailed to the property address;
 - vi. Vehicle registration or renewal at the address in the impacted period;
 - vii. Proof of government benefits received at least one month prior and one month after the impacted period; or
 - viii. Property insurance documents indicating the insured property as primary residence.
 - c. SCDRO may require an affidavit of primary residency under penalty of civil and criminal perjury which may be considered along with any other fact relating to primary residency.
- 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 property must be located within the FEMA-designated 100-year floodplain.

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

- Individuals who are in the extremely low and very low income brackets;⁷⁴
- Persons with documented disabilities; and
- Age-dependent household members at the time of disaster or at the end of the application intake period (aged 65 or older, or 17 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	81% AMI to 120% AMI
Applicant's Household Includes <i>Either</i> Age Dependent or Disabled	1st Priority	3rd Priority	5th Priority	7th Priority
Applicant's Household Includes Neither Age Dependent or Disabled	2nd Priority	4th Priority	6th Priority	8th Priority

Applicants will apply for assistance through the Single-Family Housing Program. If the applicant's disaster damaged home is located in a MID county and located within the 100-year floodplain, as identified by the Tier II environmental review, the applicant will be given the option to participate in the Voluntary Buyout Program. If the applicant does not wish to continue to the buyout program, they still may be eligible to participate in the single-family housing program.

Maximum Assistance Amount

The maximum amount of CDBG-DR funding available for any single buyout is capped at \$250,000, including any additional incentives. Using CDBG-DR funds, the program provides property owners the pre-disaster fair market value of their home and may also include an incentive payment to encourage relocation to an area of reduced flood risk.

Eligible costs included in the buyout maximum assistance amount include the buyout purchase price, moving incentive up to \$5,000, an LMI incentive up to \$25,000 and a Market Adjustment Incentive to assist the homeowner with the relocating to a new home in their community. The Market Incentive is designed to supplement the pre-disaster value of the home to reach a "fair price" determined by SCOR that will allow a current homeowner to purchase a similar home in the non-flooding portion of their community.

Exceptions

Buyouts that exceed the maximum award due to the appraised pre-disaster fair market value will be reviewed on a case-by-case basis and may be considered for an exception. Applicants may include their

⁷⁴ Applicants may review income limits for their household size by reviewing the table of income limits by county, available in the Appendix.

own appraisal to request an exception. These requests will be reviewed by the Special Case Panel (SCP), and the extenuating circumstances will be documented and approved on an as needed basis.

Affordable Rental Program

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 disaster-declared counties. The program will provide up to \$50,000 in construction services 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.

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 of⁷⁵:

- 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 \$50,000 cap each. SCDRO may consider repairs beyond the \$50,000 cap on a case-by-case basis.

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 State to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain. SCDRO's Buyout Program is voluntary and SCDRO will not utilize the power of eminent domain because SCDRO has no direct authority to perform eminent domain. SCDRO will follow the criteria required of agencies that do not have eminent domain under 49 CFR 24.101(b)(2) (i-ii) when presenting a buyout as an option for Buyout Program applicants as follows:

- Prior to making an offer for the property, clearly advise the owner that it is unable to acquire the property if negotiations fail to result in an agreement; and
- Inform the owner in writing of what it believes to be the market value of the property.

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

⁷⁵ More information on HOME rents may be found at: <https://www.hudexchange.info/manage-a-program/home-rent-limits/>

treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-6182-N-01. The State will designate a URA specialist to ensure compliance with the Uniform Relocation Act (URA), where applicable.

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. This plan is intended to maximize the opportunity for citizen involvement in the planning and development of the South Carolina CDBG-DR recovery program.

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. South Carolina intends to focus outreach efforts to facilitate participation from individuals of low and moderate income, those living in slum and blighted areas, those living in areas identified for recovery through CDBG-DR, non-English speaking persons, and other disadvantaged populations. SCDRO has consulted with local governments, public housing authorities, nongovernmental organizations, the private sector, and other stakeholders and affected parties in the disaster-impacted area to ensure this plan is consistent with regional redevelopment plans.

The State will publish its Action Plan in Spanish as well as English. In addition to citizen involvement, South Carolina encourages the participation of regional and State-wide institutions, especially Volunteer Organizations Active in the Disaster (VOADs).

South Carolina will consider any comments received in writing, via email, or via telephone. Additionally, 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 Outreach

Typically, South Carolina holds public hearings during Action Plan development to collect early input from citizens impacted by the disaster. Given the current COVID-19 pandemic, SCDRO has modified the approach to collecting public input and notifying the public about proposed activities. SCDRO has developed a presentation which outlines the programs and activities identified in the action plan. This presentation is available on the SCDRO website. Additionally, SCDRO will host telephonic conferences with any interested parties to discuss the plan prior to submission to HUD for approval. South Carolina has considered any comments or views of citizens received in writing and the responses to those comments are in the Appendix.

South Carolina has also presented a presentation outlining the programs and activities identified in the action plan at the Interagency and Stakeholder Recovery Coordination Group prior to and following the publication of the Action Plan on the below dates:

Date	Event
27 February 2020	Interagency Stakeholder Coordination Briefing (In Person Meeting)
20 May 2020	7 th Congressional District Stakeholder Presentation (Virtual Meeting)
16 July 2020	Interagency Stakeholder Coordination Briefing (Virtual Meeting)
29 July 2020	Horry County Resiliency Meeting (Virtual Meeting)
20 August 2020	Interagency Stakeholder Coordination Briefing (Virtual Meeting)
17 September 2020	Interagency Stakeholder Coordination Briefing (Virtual Meeting)

Individuals who required auxiliary aids or special assistance to view the presentation should contact the SCDRO (803-896-4068 or ContactSCDR@scdr.sc.gov). Citizens with hearing impairment can call Relay South Carolina at 7-1-1 for assistance.

Public Notice and Comment Period

Notice of public comment period will be provided by publication on the South Carolina Disaster Recovery Office website. South Carolina will open the citizen comment period for the following timeframes:

- Comment period for the original Action Plan will take place for 30 days after the publication of the Action Plan to the SCDRO website. The original Action Plan was posted on the website in English and Spanish on 24 July 2020.
- Comment period for Substantial Amendments will take place for 14 days after the publication of the Substantial Amendment to the SCDRO website.

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 South Carolina. 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 seek public input on program design issues including the amount of assistance South Carolina expects to receive, the range of activities that may be undertaken, 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 SCDRO 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 \$5 million; or
- A change in planned beneficiaries.

Citizens will be provided with no less than 14 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 SCDRO 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 30 days following the end of each calendar quarter. Within three days of submission to HUD, South Carolina will post each QPR on the SC Disaster Recovery Office website (<https://www.admin.sc.gov/SCDRO>). 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

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.

To ensure accessibility for applicants, SCDRO has adopted a Section 504/Americans with Disabilities Act (ADA) policy which ensures the full right to reasonable accommodations by all program participants. No otherwise qualified individual with disabilities shall solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded with CDBG-DR funds provided SCDRO.

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English may be entitled to language assistance with respect to a particular type of service, benefit or encounter. Where a significant number of non-English speaking residents can be reasonably expected to participate in public hearings or open comment periods, materials to be handed out will be translated into the appropriate language, citizen comments in a language other than English will be translated, 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. SCDRO has adopted a Language Assistance Plan (LAP) that is cognizant of these demographics and offers additional information on providing equal access to all citizens.

Technical Assistance

Upon request, limited technical assistance will be provided by SCDRO 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 no subrecipients or sub-grantees.

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 investigation as necessary. The Constituent Services Team will ensure complaints are resolved, escalated to appropriate personnel if needed, and any necessary follow-up actions are completed.

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 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, and program operational procedures, as each is interpreted by the State of South Carolina. During these activities, it is possible that citizens may decide they have a legitimate reason to appeal a decision. Applicants can 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 (ContactSCDR@admin.sc.gov) or submit by postal mail to the following address:

Attention: Constituent Services
South Carolina Disaster Recovery Office, 632 Rosewood Drive, 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 Constituent Services' 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 U.S. Department of Housing and Urban Development (HUD) at:

U.S. Department of Housing and Urban Development
1835 Assembly Street, 13th Floor, Columbia, SC 29201

State Outreach

During the development of this Action Plan, the State will conduct 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 needs assessment, 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 socially vulnerable areas identified in the Unmet Needs Assessment. Outreach activities will be targeted towards this audience in order to ensure the most vulnerable populations receive enhanced focus.

Program Intake

An applicant intake center will be established in Marion County within 30 days of the implementation contractor and the State executing a contract for the Hurricane Florence CDBG-DR program. This intake center will accept applications for program participation for no less than 90 days. Additional outreach and application acceptance will be conducted through mobile intake centers throughout the Hurricane-affected area. 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, 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. If program income is generated, SCDRO will input the amount of program income into DRGR on a quarterly basis. With the input of program income, the Project Budgets and Activity Budgets will also be updated. After the adjustments in DRGR have been made to account for program income, SCDRO will resubmit the DRGR Action Plan for HUD approval.

Pre-agreement Activities

The provisions of 24 CFR 570.489(b) and 570.200 (h) permits a State to reimburse itself for otherwise allowable costs incurred by itself or its recipients sub grantees or sub recipients on or after the incident of the covered disaster. 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 the Hurricane Florence disaster.

The South Carolina Department of Administration (Admin) incurred pre-award costs and is seeking reimbursement for these costs that are reasonable and allowable under this regulation. Admin 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, and the costs associated with the completion of the unmet needs assessment by a Disaster Metrics, LLC. The total pre-award costs accumulated by the SCDRO were \$72,407 as of July 1, 2020.

Pre-award Implementation Plan

The South Carolina Department of Administration is the administrator and fiscal agent for the CDBG-DR grant. The Department has prior experience in managing HUD funds through previous CDBG-DR allocations.

The Department of Administration, through the South Carolina Disaster Recovery Office, has existing systems and procedures, as well as formally established monitoring strategies that meet or exceed regulatory requirements including those related to HUD program rules and regulations, civil rights, environmental, labor standards, fair housing, citizen participation and recordkeeping.

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 using 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 the Office of the State Auditor to evaluate whether the State's major federal programs follow laws, regulations, contracts and grant rules as applicable to each program. 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.

South Carolina will monitor 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.

The State's Single Audit is available at: <https://osa.sc.gov/wp-content/uploads/2019/03/18-Single-Audit-Report.pdf>

Financial Management Systems

South Carolina Department of Administration maintains accounting and grants management systems to support a multi-functional grants management program. These systems provide accurate, current and complete disclosure of the financial status of each CDBG-DR and CDBG-MIT 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.

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 Monitoring & Compliance, and Financial Management. 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 mitigation 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-DR 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-DR or CDBG-MIT funds, South Carolina will 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 (S.C. Code Ann. § 11-35-10 et. seq. 1976, as amended) are also governed by procurement regulations promulgated by the South Carolina Revenue and Fiscal Affairs Authority, 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.

As outlined in the following table 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/legal/procurement-law>.

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

<i>Federal Citation</i>	<i>Short Title</i>	<i>South Carolina Consolidated Procurement Code & South Carolina Budget and Control Board Regulations 19-45-445, et seq.</i>	<i>Short Title</i>
2 CFR 200.318	<i>General Procurement Standards</i>	§11-35-20	<i>Purposes and Policies</i>
2 CFR 200.319	<i>Competition</i>	§11-35-20(a)-(h)	<i>Purposes and Policies</i>
2 CFR 200.320	<i>Methods of Procurement to be followed</i>	§§11-35-1510-1580	<i>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</i>
2 CFR 200.321	<i>Contracting with Small, Minority, Women Owned Bus.</i>	§§11-35-5010; 11-35-5210; 11-35-5230; 11-35-5240; 11-35-5260; 11-35-5270	<i>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</i>
2 CFR 200.322	<i>Procurement of Recovered Material</i>	§11-35-3810; 19-445.2150	<i>Surplus Property Management</i>
2 CFR 200.323	<i>Contract Cost and Price</i>	§§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)	<i>Cost and/or Pricing Data; Contract Price Adjustments; Cost Principles; Fair and Reasonable Price Minority Firms</i>
2 CFR 200.324	<i>Federal Awarding or pass-through Entity review</i>	<i>(Compliance with this reg. to be achieved through execution of implementation of grant agreement with HUD)</i>	
2 CFR 200.325	<i>Bonding Requirements</i>	§11-35-3030; 19.445-2145(C)(M)	<i>Bond and Security</i>
2 CFR 200.326	<i>Contract Provision</i>	§11-35-3040	<i>Contract Clauses and their Administration</i>

Duplication of Benefit

In accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288 as amended, 42 U.S.C. 5121-5207, 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 disaster. 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 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 CDBG-DR 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 disaster, 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.

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 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 repair/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 PL 115-254 and PL 116-20 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 monthly 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. This will allow the State to identify funds recipients are not expected to draw, permitting the State to identify recipients with on-

track projects where recaptured funds can be redirected, 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. This will allow for the State to expeditiously expend funds to accomplish program goals while complying with all applicable requirements.

Management of Funds

Monitoring will be conducted by the Department of Administration 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 will monitor funds using the HUD Disaster Recovery Grant Reporting (DRGR) system and meetings hosted by the Contracts Manager and Statistical and Research Analyst III (DRGR Specialist.) Audit functions will be conducted by the designated Department of Administration auditors hired to support this program as outlined in the Financial Roles section 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 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 will not 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 by utilizing the eligibility prioritization matrix to allow program staff to consistently budget funds toward the most vulnerable beneficiaries, in as fluid a manner as possible.

The State has a Director of Internal Audit on staff. 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. Website information will be updated on an as needed basis, and at a minimum quarterly. The initial website will reside on the South Carolina Disaster Recovery Office website at <http://www.scdr.sc.gov> during action plan development and program setup. 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.

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 Department of Administration maintains ownership of the Department's current website and is involved in publishing all content to the Disaster Recovery page in cooperation with SCDRO staff. 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 as local newspapers.
- Action Plan for Disaster Recovery will be posted to the SCDRO website 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.
- The DRGR Action Plan will be posted to the program website once established.
- Substantial Action Plan Amendments will be posted on the SCDRO website 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 to the program website within 3 days of being submitted to HUD.
- The Citizen Participation Plan will reside permanently on the program website.
- An electronic portal for citizen complaints and concerns will be located on the program website.
- Program announcements will be posted to the program website on a rolling basis as approved by the Program Director.
- Executed contracts.

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.

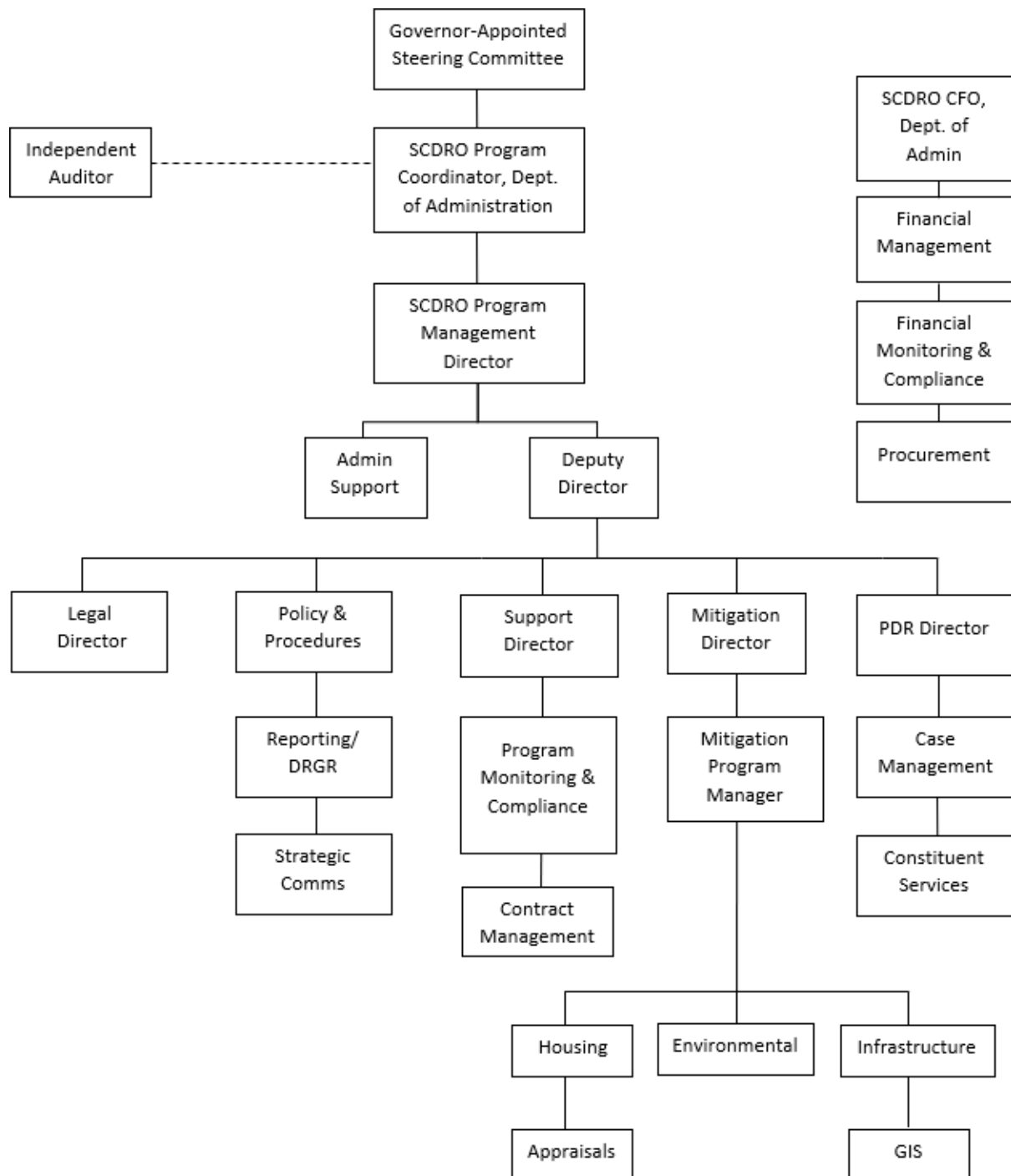
Proactive communication from the program regarding application status will occur on a frequent basis during initial intake. At which time, program staff will proactively contact applicants to request missing eligibility documentation and verify information entered on the application form. Once all documentation 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. The Constituent Services Team protects the applicant's ability 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 DRO: Administrative Structure



Key staff members, particularly those in the financial management section, have prior experience with both the HUD CDBG annual program and the October 2015 CDBG-DR program. 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 intends to fill all vacant positions within six months. SCDRO positions are as follows⁷⁶:

The South Carolina Disaster Recovery Steering Committee - In Place

The State Disaster Recovery Steering Committee advises the South Carolina Disaster Recovery Office (SCDRO) 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 Disaster Recovery Steering Committee members are appointed by the Governor. Members of the Board elect the chairperson.

SCDRO Program Coordinator – Filled

The State Disaster Recovery Program Coordinator ensures that the program activities align to the State Disaster Recovery 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 Officer 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.

SCDRO Deputy Program Management Director- Filled

The SCDRO Deputy Director directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the State. The Deputy Director focuses on engaging State, County, Municipal and Community leaders to educate, inform and gain assistance in the disaster recovery process. Links internal 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. Directly oversees the execution of the SCDRO Constituent Services.

⁷⁶ 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.

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.

Mitigation Director - Filled

The SCDRO Mitigation Program Management Director directs, implements, coordinates, and advocates mitigation and resiliency goals, objectives, and outcomes set by the State. The SCDRO Mitigation 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 Management Director.

Mitigation Program Manager - Filled

The SCDRO Mitigation Program Manager directs, implements, coordinates, and advocates mitigation and resiliency goals, objectives, and outcomes set by the State. The Mitigation Program Manager serves as the Deputy Mitigation Director focusing on engaging State, County, Municipal and Community leaders to educate, inform and gain assistance in the disaster recovery process. Links internal 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. Directly oversees the execution of the SCDRO Mitigation Program Delivery.

Administrative Coordinator I - Vacant

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 data input, 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.

Infrastructure Program Manager (Engineering Associate II) - Vacant

The Infrastructure PM provides overall management, strategic operations, administrative support, and communication for the infrastructure mitigation effort. The Infrastructure PM provides recommendations on complex projects. Prepares and reviews designs, drawings, plans and specifications for construction projects. Supervises field studies or surveys to collect technical data. Writes environmental permits. Leads the conceptualization, development, coordination, and evaluations of policies to ensure program coordination guidance and policies are in alignment with State Action Plan.

State Appraiser I - Vacant

The State Appraiser will determine the fair value for county or state tax for the Mitigation Buyout program. This individual will work closely with the staff attorney to develop and execute the buyout strategy for the project counties. Completes forms and records. Researches legal records to determine current ownership and land areas for appraisal. Appraises selected properties and prepares reports pertaining to appraisals.

Engineering Associate I (Housing) - Vacant

The Engineering Associate I (Housing) 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 for the Mitigation Housing Projects.

Engineering Associate I (Infrastructure) - Vacant

The Engineering Associate I (Infrastructure) 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 for the Mitigation Infrastructure Projects.

GIS Analyst – Vacant

The GIS Analyst collects, analyzes and interprets geographic information provided by geodetic surveys, aerial photographs, and satellite data. Researches and prepares maps and other spatial data in digital or graphic form. Performs data acquisition, entry, update and quality checking for the overall SCDRO Mitigation Program.

Engineering Associate I (Environmental Coordinator) – Vacant

The Environmental Coordinator will review, assess and prepare required records for the execution of the Mitigation Operations and associated construction management projects relative to environmental requirements (i.e., State Historical Preservation Office). Conducts field studies or surveys to collect data. Leads field inspection of construction projects. Prepares technical reports.

Program Coordinator II – Filled

Overall facilities coordinator. Has in-depth knowledge of headquarters and remote facilities infrastructure to maintain continuity of operations for employees. Responsible for coordinating and implementing headquarters and remote location network connectivity. Responsible for troubleshooting and resolving moderate complex IT issues. Assists with evaluating technologies and makes recommendations for adoption.

Project Coordinator - Vacant

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.

Operations Specialist – 1 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.

Policy and Procedure Manager - 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.

Legal Director - Filled

The Legal Director provides legal counsel and guidance to the Disaster Recovery Office on the development of disaster recovery plans and the implementation of activities. The Legal Director represents the Disaster Recovery Office in any litigation matters and supervises the legal staff.

Attorney III - Filled

The Legal Advisor provides legal counsel and guidance to the Disaster Recovery Office on the development of disaster recovery plans and the implementation of activities. The Legal Advisor assists in the completion of closing packets for buyouts and real estate transactions conducted by the SCDRO.

Paralegal – 2 Filled

The Assistant Legal Advisor assists in providing and researching legal counsel and guidance to the Disaster Recovery Office on the development of disaster recovery plans and the implementation of activities. The Assistant Legal Advisor represents the Disaster Recovery Office in the absence of the Legal Advisor.

Case Management Director - Filled

The Case Management Director provides supervision and general guidance to the Constituent Services Team and the Case Management Team.

Constituent Services Lead - Filled

The Constituent Services Lead serves as Ombudsman for the Disaster Recovery Office (DRO). 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 DRO and the public. The Lead develops and implements comprehensive communications plans relating to researching, managing and resolving constituent complaints and concerns.

Constituent Services Assistant – 2 Filled

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 mitigation efforts. Performs various administrative functions in the office of the ombudsman.

Case Management Supervisor – Filled

The Case Management Supervisor provides general supervision to the Case Managers, providing planning and coordination to ensure that the Case Managers successfully execute their mission.

Case Managers – 6 Filled

The Case Manager coordinates the communication with housing clients being served by the State's Housing Programs from intake to project closeout. The Case Manager notifies applicants about important timeline events such as contract signings, move out dates, and move in dates. The Case Manager forwards complaints concerning operations to Constituent Services for review.

Compliance Manager – Filled

Compliance Manager schedules work products for the Compliance Monitors and provides general supervision for the compliance staff. The Compliance Manager reports to the Director of Support.

Compliance Monitor – 6 Filled

Compliance Monitors conduct desktop reviews and field inspections through every phase of vendor contract performance. Compliance monitors' job duties include reviewing job sites, evaluating compliance with requirements and regulations, and maintaining communication to ensure timely correction of noted deficiencies.

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.

Finance Manager – Filled

The Finance 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 – 2 Filled and 2 Vacant

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 2 Filled

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 housing case management 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 database 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 utilize its current Interagency and Stakeholder Recovery Coordination Group to continue a multi-stakeholder approach. The monthly Interagency and Stakeholder Recovery Coordination Group consists of Long-Term Recovery Group members, VOADs, Charitable and Non-Profit groups, Disaster Case Managers, the SC DHEC, SCEMD, and representatives from county emergency management offices. This multi-agency formation has been key to considering recovery from a holistic perspective. Their feedback has generated changes and improvement in SCDRO's policies and procedures.

Technical Assistance

Technical assistance to program participants will be provided by SCDRO program staff as needed. Requests should be made in a timely manner and within the time parameters of the appropriate program design. The State has developed some technical capacity through the implementation of its current CDBG-DR program, however the State may contract with other technical assistance providers should sufficient demand for technical assistance warrant.

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 provision 18. Reimbursement of disaster recovery expenses of 83 FR 5850 and 83 FR 5861 (2018), has met with representatives of the South Carolina Historic Preservation Office (SHPO). SCDRO is currently operating under a 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 83 FR 5850 and 83 FR 5861 (2018).

Accountability

The Governor of South Carolina has designated the South Carolina Department of Administration 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 Administration 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 Administration 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, reporting, management of the Disaster Recovery Grant Reporting (DRGR) system and timely expenditures. The Chief Financial Officer at the Department of Commerce will oversee financial compliance, financial monitoring, financial management, and oversight of the HUD line of credit.

SCDRO will initially rely on the CDBG expertise of the team that is in place and is currently monitoring the 2015 storm grant and the 2016 Hurricane Matthew grant. This expertise will be used to conduct the SCDRO's monitoring plan and to train any additionally hired SCDRO personnel in CDBG regulations, policies and procedures. Between auditing and monitoring activities, the State expects to examine/review over 25% of all intake and construction activities.

Certification of Accuracy of Risk Analysis Documentation

The State of South Carolina hereby certifies that it currently has 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. 115-254 and PL 116-20. applicable to funds allocated by FR-6066-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

Certifications

The State of South Carolina hereby certifies that it currently has the capacity to carry out disaster recovery activities in a timely manner and the following:

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.
- e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. Each State receiving a direct award under this Notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2018 and 2019 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - (2) With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 % of the grant amount is expended for activities that benefit such persons.

(4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

i. The grantee certifies that it grant will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.

j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:

(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

(2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

k. Each State receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a under Section VI and its Implementation Plan and Capacity Assessment and related submission to HUD referenced at A.1.b under Section VI.

l. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a special flood hazard area (or 100-year floodplain) in FEMA's most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

- m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- n. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.
- o. The grantee certifies that it will comply with applicable laws.

Appendix

2019 HUD Area Median Income Limits by County

2019 HUD Area Median Income Limits for South Carolina										
County Name	County AMI	% of AMI	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Chesterfield County	46,700	30% AMI	12,490	16,910	21,330	25,750	28,250	30,350	32,450	34,550
		50% AMI	18,350	20,950	23,550	26,150	28,250	30,350	32,450	34,550
		80% AMI	29,300	33,500	37,700	41,850	45,200	48,550	51,900	55,250
		120% AMI	43,950	50,250	56,550	62,775	67,800	72,825	77,850	82,875
Darlington County	54,600	30% AMI	12,490	16,910	21,330	25,750	29,200	31,350	33,500	35,650
		50% AMI	18,900	21,600	24,300	27,000	29,200	31,350	33,500	35,650
		80% AMI	30,250	34,600	38,900	43,200	46,700	50,150	53,600	57,050
		120% AMI	45,375	51,900	58,350	64,800	70,050	75,225	80,400	85,575
Dillon County	41,500	30% AMI	12,490	16,910	21,330	25,750	28,250	30,350	32,450	34,550
		50% AMI	18,350	20,950	23,550	26,150	28,250	30,350	32,450	34,550
		80% AMI	29,300	33,500	37,700	41,850	45,200	48,550	51,900	55,250
		120% AMI	43,950	50,250	56,550	62,775	67,800	72,825	77,850	82,875
Florence County	62,000	30% AMI	12,750	16,910	21,330	25,750	30,170	34,590	37,650	40,100
		50% AMI	21,250	24,300	27,350	30,350	32,800	35,250	37,650	40,100
		80% AMI	34,000	38,850	43,700	48,550	52,450	56,350	60,250	64,100
		120% AMI	51,000	58,275	65,550	72,825	78,675	84,525	90,375	96,150
Georgetown County	59,400	30% AMI	12,500	16,910	21,330	25,750	30,170	34,500	36,850	39,250
		50% AMI	20,800	23,800	26,750	29,700	32,100	34,500	36,850	39,250
		80% AMI	33,250	38,000	42,750	47,500	51,300	55,100	58,900	62,700
		120% AMI	49,875	57,000	64,125	71,250	76,950	82,650	88,350	94,050

County Name	County AMI	% of AMI	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Horry County	61,200	30% AMI	12,850	16,910	21,330	25,750	30,170	34,590	37,950	40,400
		50% AMI	21,450	24,500	27,550	30,600	33,050	35,500	37,950	40,400
		80% AMI	34,300	39,200	44,100	48,950	52,900	56,800	60,700	64,650
		120% AMI	51,450	58,800	66,150	73,425	79,350	85,200	91,050	96,975
Marion County	41,600	30% AMI	12,490	16,910	21,330	25,750	28,250	30,350	32,450	34,550
		50% AMI	18,350	20,950	23,550	26,150	28,250	30,350	32,450	34,550
		80% AMI	29,300	33,500	37,700	41,850	45,200	48,550	51,900	55,250
		120% AMI	43,950	50,250	56,550	62,775	67,800	72,825	77,850	82,875
Marlboro County	41,600	30% AMI	12,490	16,910	21,330	25,750	28,250	30,350	32,450	34,550
		50% AMI	18,350	20,950	23,550	26,150	28,250	30,350	32,450	34,550
		80% AMI	29,300	33,500	37,700	41,850	45,200	48,550	51,900	55,250
		120% AMI	43,950	50,250	56,550	62,775	67,800	72,825	77,850	82,875

Milestones

	QPR 1		QPR 2		QPR 3	
	Oct-Nov-Dec 2020		Jan-Feb-Mar 2021		Apr-May-Jun 2021	
Program	Projected	Actual	Projected	Actual	Projected	Actual
Single Family Housing Program	\$ 1,000,000		\$ 1,000,000		\$ 7,500,000	
Buyout Program	\$ -		\$ 2,000,000		\$ 1,000,000	
Rental Repair Program	\$ -		\$ -		\$ -	
Planning	\$ 171,250		\$ -		\$ -	
Program Administration	\$ 180,187		\$ 180,187		\$ 180,187	
TOTAL	\$ 1,351,437	\$ -	\$ 3,180,187	\$ -	\$ 8,680,187	\$ -

	QPR 4		QPR 5		QPR 6	
	Jul-Aug-Sep 2021		Oct-Nov-Dec 2021		Jan-Feb-Mar 2022	
Program	Projected	Actual	Projected	Actual	Projected	Actual
Single Family Housing Program	\$ 7,500,000		\$ 7,500,000		\$ 7,500,000	
Buyout Program	\$ 1,000,000		\$ 1,000,000		\$ 2,000,000	
Rental Repair Program	\$ 500,000		\$ 500,000		\$ -	
Planning	\$ 100,000		\$ -		\$ -	
Program Administration	\$ 180,187		\$ 180,187		\$ 180,187	
TOTAL	\$ 9,280,187	\$ -	\$ 9,180,187	\$ -	\$ 9,680,187	\$ -

	QPR 7		QPR 8		QPR 9	
	Apr-May-Jun 2022		Jul-Aug-Sep 2022		Oct-Nov-Dec 2022	
Program	Projected	Actual	Projected	Actual	Projected	Actual
Single Family Housing Program	\$ 7,500,000		\$ 7,500,000		\$ 2,000,000	
Buyout Program	\$ 2,000,000		\$ 1,000,000		\$ -	
Rental Repair Program	\$ -		\$ -		\$ -	
Planning	\$ 100,000		\$ -		\$ -	
Program Administration	\$ 180,187		\$ 180,187		\$ 180,187	
TOTAL	\$ 9,780,187	\$ -	\$ 8,680,187	\$ -	\$ 2,180,187	\$ -

	QPR 10		QPR 11		QPR 12	
	Jan-Feb-Mar 2023		Apr-May-Jun 2023		Jul-Aug-Sep 2023	
Program	Projected	Actual	Projected	Actual	Projected	Actual
Single Family Housing Program	\$ 2,000,000		\$ 1,000,000		\$ 1,000,000	
Buyout Program	\$ -		\$ -		\$ -	
Rental Repair Program	\$ -		\$ -		\$ -	
Planning	\$ 200,000		\$ -		\$ 100,000	
Program Administration	\$ 180,187		\$ 180,187		\$ 180,187	
TOTAL	\$ 2,380,187	\$ -	\$ 1,180,187	\$ -	\$ 1,280,187	\$ -

	QPR 13		QPR 14		QPR 15	
	Oct-Nov-Dec 2023		Jan-Feb-Mar 2024		Apr-May-Jun 2024	
Program	Projected	Actual	Projected	Actual	Projected	Actual
Single Family Housing Program	\$ 1,000,000		\$ 1,000,000		\$ 500,000	
Buyout Program	\$ -		\$ -		\$ -	
Rental Repair Program	\$ -		\$ -		\$ -	
Planning	\$ -		\$ 200,000		\$ 200,000	
Program Administration	\$ 180,187		\$ 180,187		\$ 180,187	
TOTAL	\$ 1,180,187	\$ -	\$ 1,380,187	\$ -	\$ 880,187	\$ -

	QPR 16		QPR 17		QPR 18	
	Jul-Aug-Sep 2024		Oct-Nov-Dec 2024		Jul-Aug-Sep 2025	
Program	Projected	Actual	Projected	Actual	Projected	Actual
Single Family Housing Program	\$ 500,000		\$ -		\$ -	
Buyout Program	\$ -		\$ -		\$ -	
Rental Repair Program	\$ -		\$ -		\$ -	
Planning	\$ 100,000		\$ 100,000		\$ 100,000	
Program Administration	\$ 180,187		\$ 180,187		\$ 180,187	
TOTAL	\$ 780,187	\$ -	\$ 280,187	\$ -	\$ 280,187	\$ -

	QPR 19		QPR 20		
	Oct-Nov-Dec 2025		Jul-Aug-Sep 2026		
Program	Projected	Actual	Projected	Actual	Total
Single Family Housing Program	\$ -		\$ -		\$56,000,000
Buyout Program	\$ -		\$ -		\$10,000,000
Rental Repair Program	\$ -		\$ -		\$1,000,000
Planning	\$ 100,000		\$ -		\$1,471,250
Program Administration	\$ 180,187		\$ 180,197		\$3,603,750
TOTAL	\$ 280,187	\$ -	\$ 180,197	\$ -	\$72,075,000

SBA Loans by NAICS Code

NAICS Category	Loans for Structure and Operations	
	Total Approved	Total Awarded
#N/A	\$81,500	\$74,700
<i>All Other Professional, Scientific, and Technical Services</i>	\$3,300	\$3,300
<i>Barber Shops</i>	\$2,300	\$2,300
<i>Beauty Salons</i>	\$43,900	\$57,800
<i>Claims Adjusting</i>	\$8,900	\$8,900
<i>Convenience Stores</i>	\$25,000	\$25,000
<i>Fitness and Recreational Sports Centers</i>	\$181,100	\$166,000
<i>Flooring Contractors</i>	\$191,300	\$150,000
<i>Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers</i>	\$6,600	\$8,100
<i>Furniture Stores</i>	\$42,100	\$42,100
<i>General Automotive Repair</i>	\$9,900	\$9,900
<i>Hotels (except Casino Hotels) and Motels</i>	\$38,600	\$38,600
<i>Landscaping Services</i>	\$189,500	\$109,300
<i>Lessors of Nonresidential Buildings (except Mini-warehouses)</i>	\$56,200	\$47,100
<i>Lessors of Residential Buildings and Dwellings</i>	\$921,600	\$833,400
<i>Offices of Dentists</i>	\$47,900	\$47,900
<i>Offices of Real Estate Agents and Brokers</i>	\$48,800	\$48,800
<i>Other Building Equipment Contractors</i>	\$8,400	\$8,400
<i>Other Direct Selling Establishments</i>	\$2,900	\$2,800
<i>Other Similar Organizations (except Business, Professional, Labor, and Political Organizations)</i>	\$244,900	\$244,900
<i>Religious Organizations</i>	\$1,266,800	\$1,144,700
<i>Residential Remodelers</i>	\$25,600	\$25,600
<i>Used Car Dealers</i>	\$112,500	
<i>Women's Clothing Stores</i>	\$3,500	\$3,500
<i>Janitorial Services</i>		\$69,100
Total	\$3,563,100	\$3,172,200