

CDBG-DR ACTION PLAN

FOR ST. CLAIR COUNTY, IL

2022 FLOOD DISASTER EVENTS



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Executive Summary

Executive Summary

Overview

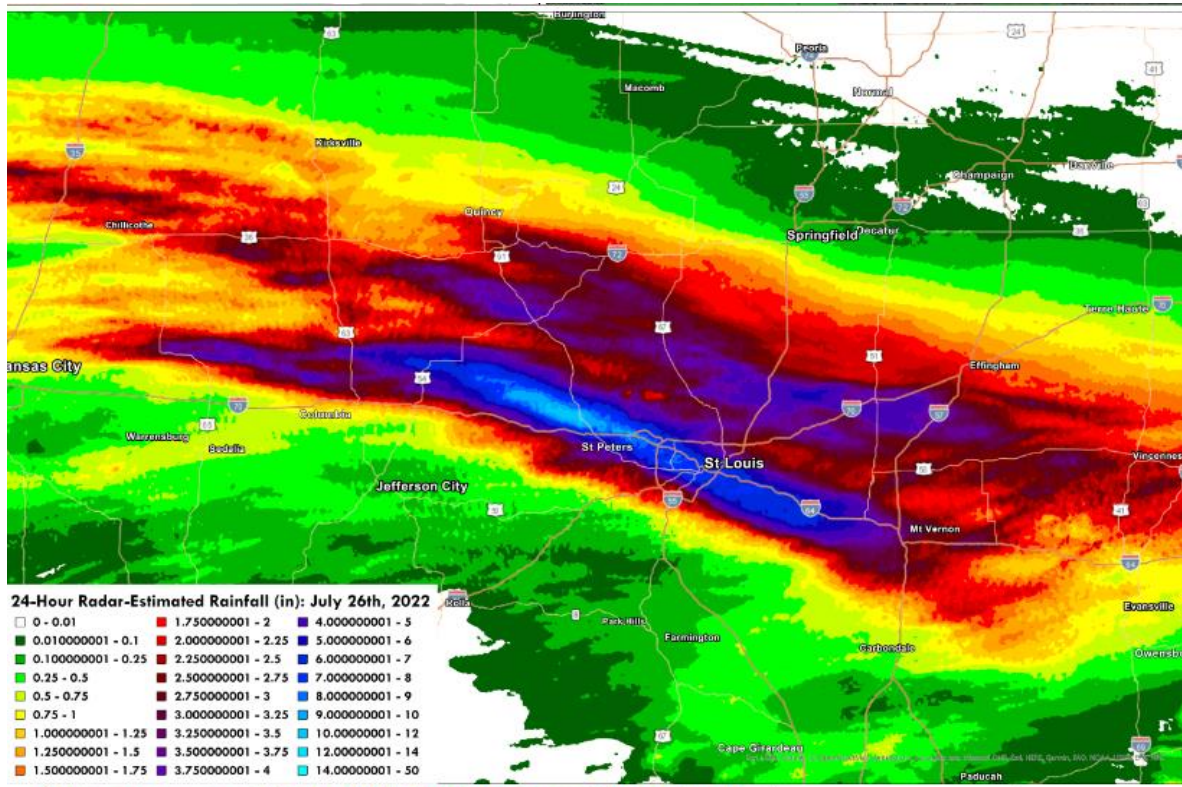
The U. S. Department of Housing and Urban Development (HUD) announced in May of 2023 that St. Clair County will receive over \$30 Million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the 2022 flood disaster. St. Clair County is the recipient of HUD's Community Development Block Grant – Disaster Recovery (CDBG-DR) funds. The CDBG-DR funding is designed to address the needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet needs in St. Clair County due to the flood disaster that occurred during July 25-28, 2022.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$30,027,000 in CDBG-DR funds to St. Clair County in response to the 2022 flood disaster (DR- 4676) through FR-6393-N-01 (Public Law 117-328) made on May 18, 2023. This allocation was made available through the Continuing Appropriations Act of 2023 for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most-impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2021 or 2022. Additionally, the Department of Housing and Urban Development Appropriations Act, 2023 (Pub. L. 117-328, Division, L, Title II) approved December 29, 2022, makes available CDBG-DR funds for major disasters that occurred in 2022. These allocations from Public Laws 117-180 and 117-328, (collectively, the “Appropriations Acts” are for disasters occurring in 2022.

Disaster-Specific Overview

Days of heavy rain triggered the flood disaster across St. Clair County during July 25-28, 2022, flooding homes and businesses, causing widespread damage, overwhelming storm water and sewage systems, and forcing the evacuation of more than 300 residents. On the 26th *alone* 8.64 inches of rain fell, a value breaking the previous record of 6.85 from August 20, 1915, during the Galveston Hurricane that year. In fact, the St. Louis area exceeded its normal rainfall for July and August in that 6-hour period.² This flash event caused 94 water rescue incidents with over 150 people involved.

Figure 1: Multi-Radar Multi-Sensor (MRMS) 24-Hr Radar-Estimated Rainfall as of 12PM on July 26th, 2022

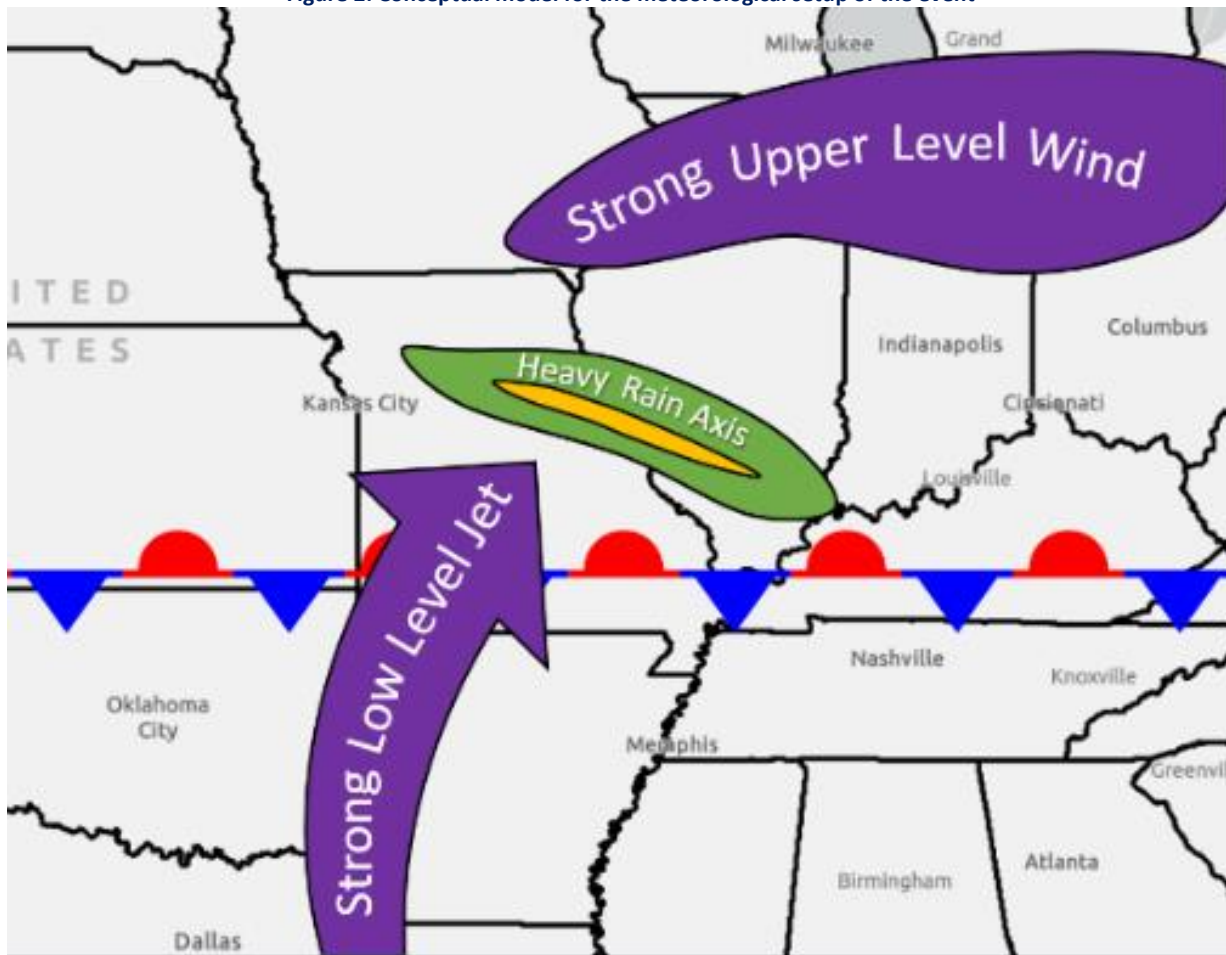


Up to 9 inches of rain fell in a 6-to-10-hour period causing widespread flash flooding. The heaviest rain axis extended from East St. Louis southeastward towards Mascoutah. Numerous roads were flooded, including northbound I-55 at I-64, ramps from I-64 to I-255, U.S. Highway 50 between O'Fallon and Lebanon, and Illinois Route 15 near the intersection with Frank Scott Parkway. Several water rescues were performed including on Illinois Route 15 at Karch Road, east of Freeburg and on West F Street near North 3rd Street in Belleville. An estimated 600 St. Clair County households were damaged by flash flooding. The St. Clair County Animal Shelter was flooded in Belleville, so several dozen dogs and some cats had to be evacuated and placed in other shelters or homes temporarily. Overall, no injuries were reported in St. Clair County.¹

¹ National Oceanic and Atmospheric Administration Storm Events Database:

The heavy rain fell north of a stationary front that was anchored across Missouri and Southern Illinois. A strong southwesterly low-level jet featuring winds in excess of 50 mph (around 5K feet above ground level) brought in copious amounts of low-level moisture which interacted with the front and the upper-level jet stream to produce repeated thunderstorms over the same area for more than 6 hours. These thunderstorms caused a narrow, but intense swath of heavy rainfall: most of the area saw at least a few inches, though a narrow band of 6-12 inches crossed the area, to include St. Clair County.²

Figure 2: Conceptual model for the meteorological setup of the event

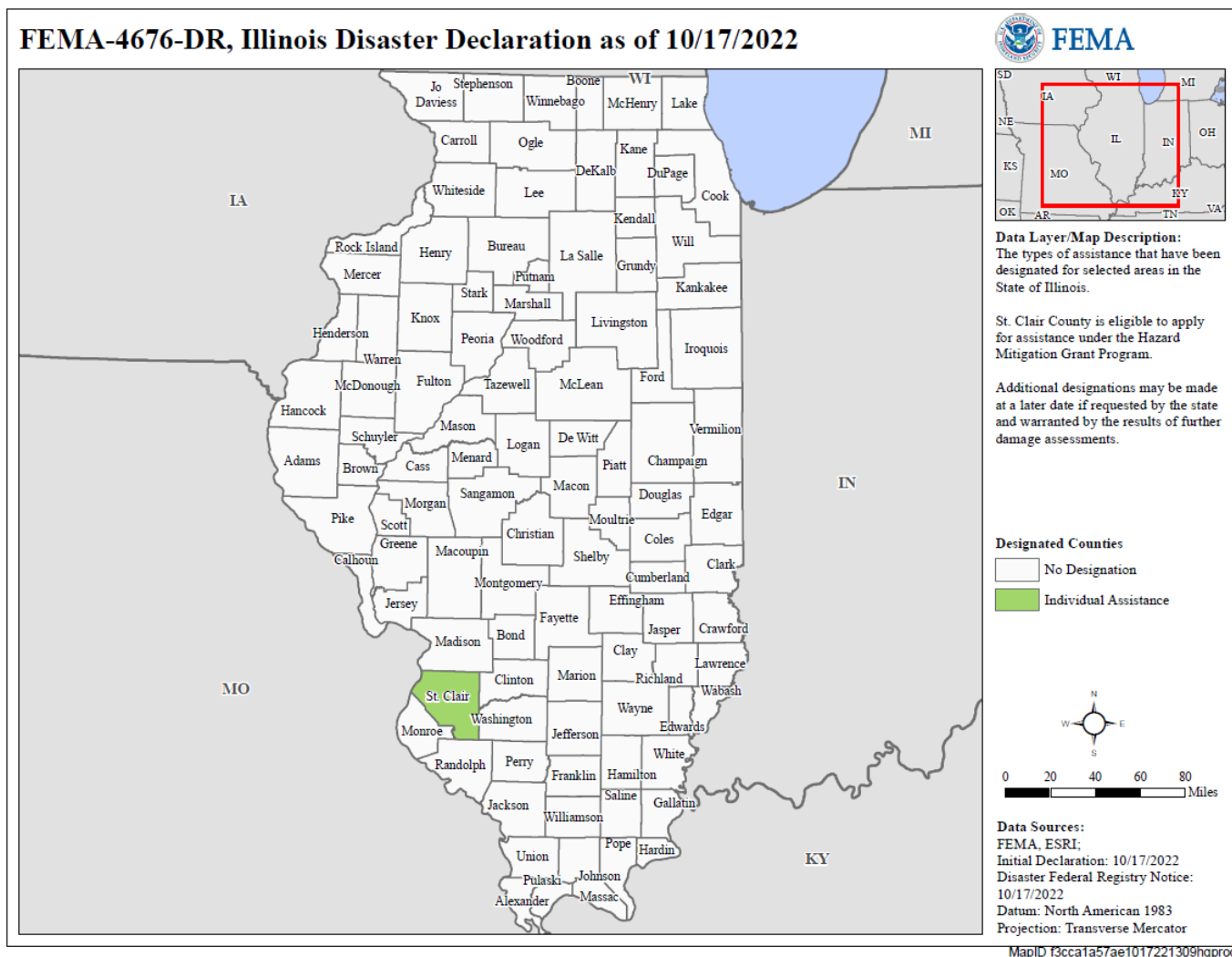


<https://www.ncdc.noaa.gov/stormevents/eventdetails.jsp?id=1050028>

² NOAA, GIS Story:

<https://storymaps.arcgis.com/stories/9d10335079444c159966e0a28c90c4df>

Figure 3: FEMA DR-4676, Presidentially Declared Disaster by County



The U. S. Department of Housing and Urban Development (HUD) announced in March of 2023 that St. Clair County will receive over \$30 Million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the 2022 flood disaster.

This flood was declared on October 14, 2022, for Severe Storm and Flooding that took place between 7/25/2022 and 7/28/2022.

These CDBG-DR funds are for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCDA) and Public Laws 117-180 and 117-328 related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2022.

Summary

To fulfill the requirements of this allocation, the County must submit to HUD an Action Plan for Disaster Recovery that identifies its unmet recovery and resilience needs. This Action Plan outlines the proposed use of CDBG-DR funds and eligible activities available to assist impacted areas to meet unmet infrastructure, planning, and other needs that have resulted from the impacts of the flooding due to heavy rains. Specifically, this plan aims to strengthen communities and neighborhoods impacted by the disaster by investing in infrastructure and public facilities. In addition, the Action Plan describes how CDBG-DR funds will be targeted toward and meet the needs of vulnerable communities, including those with low to moderate income, limited English proficiency, racially and ethnically concentrated communities, and individuals experiencing homelessness.

The County has been engaging local communities and gathering data for the unmet needs assessment since the 2022 disaster. To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, the County has initiated meetings with various county and municipal officials, and non-profit organizations. These meetings have been beneficial in gathering information about the impacts of the storm, existing challenges to address, and solutions. The County continues to work with local governments and non-profit organizations to collect information.

The County will provide citizens and units of local government with reasonable notice and the opportunity to comment on the Action Plan and its substantial amendments. The County will convene at least two public hearings on the draft CDBG-DR Action Plan after being posted on its disaster recovery website for public comment and prior to submission to HUD. Notice of all hearings will be posted a minimum of 10 business days prior to public hearings. The County has published this draft CDBG-DR Action Plan in a manner that affords citizens, units of local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan will remain available on St. Clair County's website throughout the 30-day comment period.

The County used the best available data sources to perform the analyses of the demographic characteristics of the areas of impact; the losses sustained; and the available resources in response to housing, infrastructure, and economic revitalization. The overall unmet need for the disaster currently totals over \$32 million. The County utilized FEMA IHP data sets provided by HUD and data provided by the SBA. In addition, the County continues to work with local governments to calculate a more accurate value of unmet infrastructure needs.

CDBG-DR funds will be used to primarily address unmet infrastructure needs for the 2022 disaster allocations. Investing in infrastructure will provide the most benefit and long-term recovery solutions to the impacted communities. CDBG-DR funding will be directed to the communities most impacted and with the greatest unmet needs. The Infrastructure and

Public Facilities and Planning Programs will be implemented county-wide. The County will directly implement all programs.

Unmet Needs and Proposed Allocation

The table below gives losses across all categories where data was available before and after adjusting for identified funding sources. The unmet need is calculated by subtracting the resources available from the value of the total damage. The housing unmet need number represents the impact on housing that needs to be rehabilitated, reconstructed, or newly built. The table below reflects the most recent data available at the time of publication of this Draft Action Plan.

Table 1: Unmet Needs and Proposed Allocations

Category	Total Verified Loss	Remaining Unmet Need	% of Need Unmet	Program Allocation Amount
Housing (FEMA IA)	\$17,590,019.77	\$319,083.38	1.81%	\$17,270,936.39
Housing (SBA Home)	\$18,390,917.72	\$11,851,017.72	64.44%	\$6,539,900.00
Economic (SBA Business/EIDL)	\$22,179,003.43	\$20,307,603.43	91.56%	\$1,871,400.00
Total	\$58,159,940.92	\$32,477,704.53	44.15%	\$25,682,236.39

**Allocation Amount includes project delivery costs and does not include administration and planning costs.*

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Unmet Needs Assessment

Unmet Needs Assessment

Overview

This section follows U.S. Department of Housing and Urban Development (HUD) requirements and details the losses and needs resulting from the 2022 disaster, including identifying any remaining unmet recovery needs within the eligible impacted areas. The qualifying 2022 disaster both included severe rain and flood events that caused widespread flooding.

The unmet needs analysis includes the Most Impacted and Distressed MID areas identified by HUD in the Federal Register Notice (FRN):

1. St. Clair County

The FRN requires that 100% of the allocation address unmet disaster needs or mitigation activities in the HUD identified MID areas, which for this disaster is the entire county.

The Unmet Needs Assessment relies on the methodology published by HUD in the May 18, 2023, Federal Register Notice.³ The analysis uses the best available information from federal, state, and local resources to fully identify the total impacts, resources, and remaining unmet recovery needs and inform the programming of the County's Community Development Block Grant – Disaster Recovery (CDBG-DR) resources. To prepare this assessment, the County consulted with state agencies, local governments impacted by the disaster, Continuum of Care agencies, Public Housing Authorities, housing counseling agencies, nonprofits and private companies working in the impacted areas. For a full list of consultations, see the General Requirements Citizen Participation section.

Housing Unmet Need

Pre-Disaster Housing Conditions

Prior to the disaster, St. Clair County homeowners and renters were under health and economic pressure due to the ongoing COVID-19 pandemic. Economic losses and job layoffs impacted renters' ability to stay in affordable units and homeowners' ability to finance mortgages.⁴ Even in the years leading up to the pandemic, the County suffered from a variety

³ United States. Department of Housing and Urban Development (HUD). (May 18, 2023). *87 F.R. 31636 – Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice*. Retrieved from <https://www.hud.gov/sites/dfiles/CPD/documents/FR-6393-N-01-AAN.pdf>

⁴ Benfer, E. A., Vlahov, D., Long, M. Y., Walker-Wells, E., Pottenger, J. L., Gonsalves, G., & Keene, D. E. (2021, February). *Eviction, health inequity, and the spread of covid-19: Housing policy as a primary pandemic mitigation strategy*. Journal of urban health: Bulletin of the New York Academy of Medicine.

of housing challenges; including high housing cost burden, high risk of lead-based paint hazards, and a housing voucher wait list over 6,000 strong.

The tables below show the distribution of housing units across St. Clair County. In total there are approximately 100 thousand housing units across the county. Roughly 86.3% of housing units are occupied and 66.6% of occupied housing units are occupied by homeowners.

Table 2: Householder Demographic Summary Data

Race	Estimated Owner Occupied Housing Units	Percent Owner Occupied Housing Units	Estimated Renter Occupied Housing Units	Percent Renter Occupied Housing Units
White or Caucasian	50,894	76.38%	13,857	41.43%
Black or African American	11,721	17.59%	16,866	50.49%
Hispanic or Latino	1,952	2.93%	1,215	3.63%
Two + Races	1,590	2.39%	1,465	4.38%
Asian	723	1.09%	249	.74%
Native Hawaiian or Other Pac Islander	0	0.00%	0	0.00%
Some Other Race	556	0.83%	503	1.50%
Total Occupied Housing Units	66,635		33,444	

Source: American Community Survey 5-Year Estimates (2017-2021)

St. Clair County's housing stock of newly constructed affordable housing units is limited. Roughly 54% of residential units (both owner and renter occupied) were built before 1960, with only 6.2% built post 2010 (approx. 6.2K units)⁵.

The table below shows the homeowner and renter vacancy rates for impacted communities. Current ACS data (2017-2021) indicates that of the total housing stock (20,201), the rental vacancy rate was approximately 5.9% and an owner-occupied vacancy rate around 2%. This is compared with national averages of 6.7% and 1.4% respectively, indicating the county is well aligned with national averages.

Retrieved July 28, 2022, from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7790520/>

⁵ ACS S2504 2017-2021 5-Year Estimates

Table 3: Pre-Disaster Vacancy Rates of Renter and Owner-Occupied Housing

County	Renter-Occupied Vacancy Rate (%)	Owner-Occupied Vacancy Rate (%)	Available Housing Vacancy Rate (%)
St. Clair	5.90%	2%	3.30%

Source: American Community Survey B25004 5-Year Estimates (2017-2021)

According to the National Low Income Housing Coalition, the State of Illinois lacks 293,354 affordable and available homes for extremely low-income renters. Statewide, 27% of renters are extremely low-income, of those, 73% experience severe cost burden, which means that these households spend more than half of their income on housing. It's also important to note that most of these households are actively in the workforce, indicating that they have one or more sources of income. A lack of appropriately priced housing can cause problems such as increased susceptibility to illnesses and homelessness.⁶

The table below shows the median home value and the median gross rent in St. Clair County. While the median home value in St. Clair County is significantly lower than the median U.S. home value (\$244,900), those impacted by the disaster have significantly lower incomes than the rest of the nation.

Table 4: Evidence of Cost Burden

County	Median Home Value (in \$)	Median Gross Rent (in \$ per Month)
St. Clair	\$140,600	\$925

Source: American Community Survey 5-Year Estimates DP04, B25064 (2017-2021)

Disaster Damage and Impacts

This section provides an analysis of the housing damage resulting from flooding. It utilizes Federal Emergency Management Individual and Households Program (FEMA IHP) and Small Business Administration (SBA) data as the basis of analysis. The disaster from flooding came as a result of a historically record-breaking daily rainfall record (upward of 12 inches across the region in 12 hours—25% of the normal Annual Rainfall) which caused the National Weather Service-St. Louis to issue its first-ever flash Flood Emergency².

Severe storms and flooding impacted St. Clair County in July 2022, resulting in the FEMA DR-4676 disaster declaration. Under the declaration, 8,928 households applied for FEMA Individuals and Households Program (IHP) assistance resulting from the FEMA DR-4676 disaster. Of the total registrants, 4,865 (54%) are homeowners and 4,001 (45%) are renters.

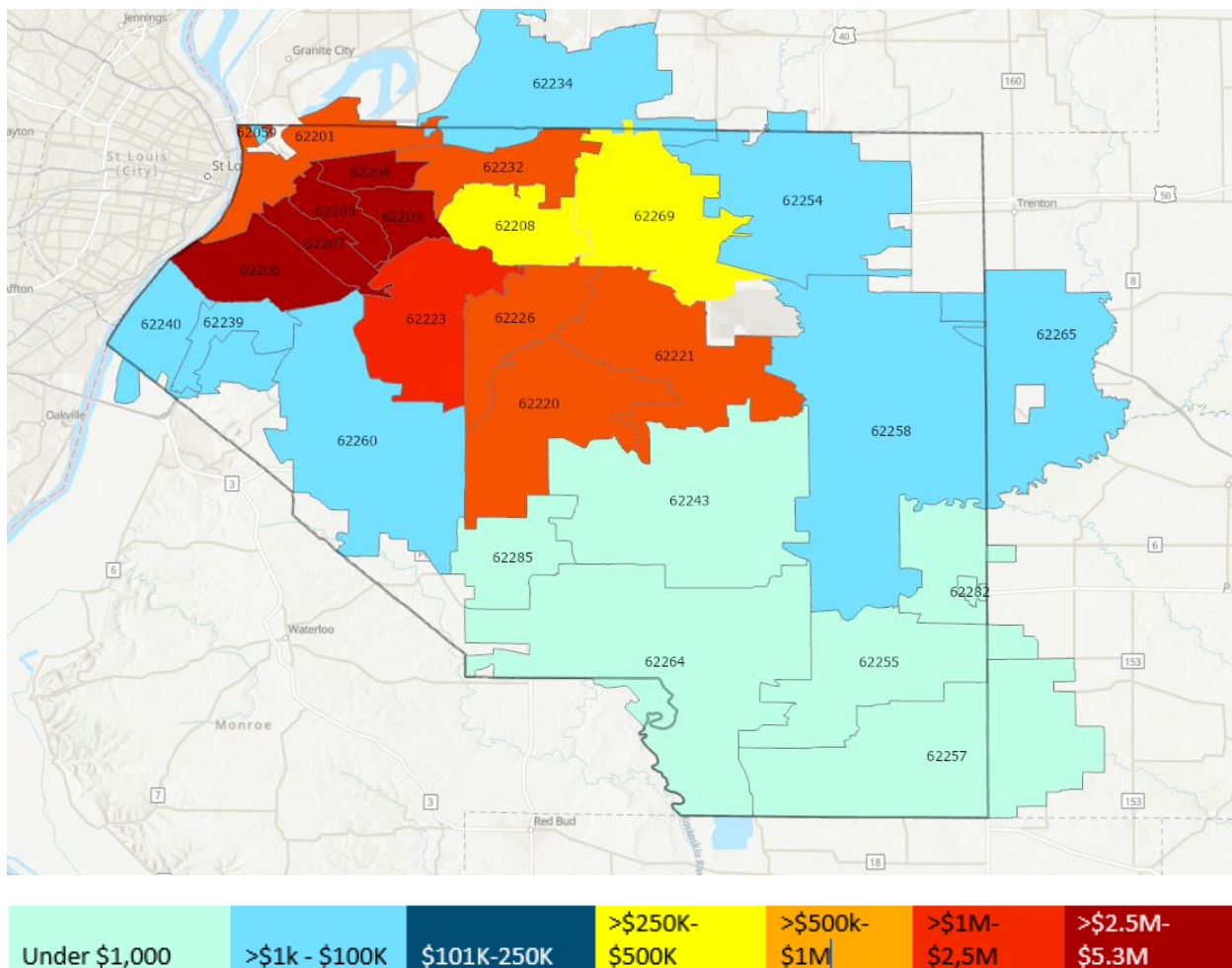
⁶ National Low Income Housing Coalition (NLIHC). *Housing Needs By State: Illinois*. Retrieved from <https://nlihc.org/housing-needs-by-state/illinois>

Of the FEMA IHP applicants, 6,328 were found to have a FEMA verified loss, including 3,891 homeowners (61%) and 2,437 renters (39%).

Of the 8,928 total households that had any FEMA verified loss for DR-4676, only 1 applicant identified the property as secondary property. The following table provides the percentage of Seasonal Vacant Homes within St. Clair County. Based on this data, impacts to secondary homes were minor compared to impacts to primary homes.

The figure below shows the impacts spread across the county and who widespread the effects of the disaster were.

Figure 4: FEMA IHP Applications by Zip Code



Additionally, there were 1,774 applications to the Small Business Administration. These included 320 from businesses, 3 from non-profits and 1,451 from homeowners. Of these applications however, only 13.8% were approved, while 66% were declined by the SBA, largely due to low incomes or lack of credit/ability to pay by the homeowner⁷.

Table 5: Seasonal Vacancy Compared to Total Housing Units

County	Seasonal Vacant	Total Housing Units	Percent Seasonal Vacant Homes
St. Clair	303	100,079	0.30%

Disaster recovery programs must spend 70% of funding to benefit low- and moderate-income households and to meet HUD's LMI national objective. According to HUD's FY 2023 Income Limits, the Median Family Income for households in St. Clair County's metro area is \$101,200. The table below shows the HUD income limits by Area Median Income (AMI) and by number of persons within a household.⁸

Table 6: HUD Income Limits – St. Clair County, IL, 2023 (St. Louis MO-IL HUD Metro FMR Area)

2023 Income Level	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$21,150	\$24,150	\$27,150	\$30,150	\$32,600	\$35,000	\$37,400	\$39,800
Very Low Income (50% AMI)	\$35,200	\$40,200	\$45,250	\$50,250	\$54,300	\$58,300	\$62,350	\$66,350
Low and Moderate Income (80% AMI)	\$56,250	\$64,300	\$72,350	\$80,350	\$86,800	\$93,250	\$99,650	\$106,100

Single-family versus Multi-family Needs: Owner Occupied versus Tenant

Table 7: FEMA IHP Owner Occupied

County	# of Applicants	# of Inspections	# Inspected with Damage & Assistance	Total FEMA Verified Loss	Average FEMA Verified Amount
St. Clair	4,865	4,865	3,891	\$20,282,052.65	\$5,212

⁷ Data from Small Business Administration, received by county 9/27/2023

⁸ United States. Department of Housing and Urban Development (HUD). (August 02, 2023). Fair Market Rents and Income Limits. Retrieved from <https://www.huduser.gov/portal/datasets/il.html>

The flood disaster impacts to renters was also extensive, with 2,437 applicants that received an inspection and were found to have a FEMA-verified loss.

Table 8: FEMA IHP Tenants Applications

County	# of Applicants	# of Inspections	# Inspected with Damage & Assistance	Total FEMA Verified Loss	Average FEMA Verified Amount
St. Clair	4,001	3,494	2,437	\$3,033,676.74	\$1,244

The table below provides a breakdown of housing type by applicants for the disaster. For owner-occupied households, most residences were categorized as a house/duplex (4,590 out of 4,865). 304 mobile home residents applied for assistance, though only a small majority (64%) were homeowners.

Table 9: FEMA IHP Applications by Housing Type

Residence Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	746	.54% (4)	99% (738)	.54% (4)	8.36%
Assisted Living Facility	5	0%	100% (5)	0%	.06%
Condo	27	22% (6)	78% (21)	0%	.30%
House/Duplex	7609	60% (4,590)	39% (2,968)	.67% (51)	85.23%
Mobile Home	304	64% (194)	36% (108)	.66% (2)	3.41%
Other	122	42% (51)	54% (66)	4% (5)	1.37%
Townhouse	106	15% (16)	85% (90)	0%	1.19%
Travel Trailer	9	44% (4)	56% (5)	0%	.10%

The Federal Register Notice establishes damage categories for both owner-occupied and rental units. The following categories are used to calculate the total damage caused by the qualifying disaster.⁹

Owner-occupied damage category for FEMA inspected units:

- Minor-Low: less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage.
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage

⁹ <https://www.federalregister.gov/d/2023-10598/p-152>

and/or 4 to 5.9 feet of flooding on the first floor.

- Severe: 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.

Renter-occupied damage category for FEMA inspected units:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor
- Severe: 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 or determination of “Destroyed” by the FEMA inspector

The following table shows the number of FEMA IHP owner-occupied applicants by HUD damage category. For this disaster, a total of 552 owner-occupied properties fall under the Major/Severe categories, indicating the highest level of damage.

Table 10: FEMA Real Property Damage Owner Occupied Units

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
St. Clair	1,214	1,613	436	105	11

Table 11: FEMA Real Property Damage Rental Units

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
St. Clair	0	1	3	3	0

Public Housing and Affordable Housing

The following section provides tables for documenting any damages to HUD-assisted Multi-family Housing. St. Clair County reached out to local governments and housing authorities to confirm any damages from the qualifying disasters, but no damages have been identified at the date of this publication. St. Clair County will update the tables when data becomes available.

Table 12: Multi-Family Assisted Housing

Type of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Awaiting Assistance	Remaining Unmet Need
No damage reported	N/A	N/A	N/A	N/A	N/A

Public Housing Authorities Damaged

The tables below indicate the number of Public Housing Authorities (PHAs) in the disaster-impacted counties. St. Clair County reached out to the impacted PHAs, however, as of the date of publication, no response to St. Clair County's request for information was received from the East St. Louis Housing Authority. The St. Clair County Housing Authority (SCCHA) did report that its storm water pump station at its Brooklyn public housing location (known as the Thomas Terry Apartments) did suffer damage and needs to be upgraded / renovated at a projected cost of approximately \$250,000 (+/-). SCCHA submitted to the St. Clair County EMS officials who compiled a disaster grant application to FEMA. SCCHA is pending notification from SCC-EMS if the disaster grant was approved and if SCCHA's project will be funded. St. Clair County will update the tables when data becomes available.

Table 13: Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHA Damages	# Of Units Damaged	Remaining Unmet Need
St. Clair County	1	\$877,000	N/A	\$877,000
East St. Louis	1	N/A	N/A	N/A

The following table uses FEMA IHP data for homeowners and renters, along with HUD income limits. HUD income limits include low and moderate income (80% of AMI), very low income (between 30% AMI and 50% AMI), and extremely low income (30% AMI and below). FEMA collects information about FEMA IHP applicants with and without flood insurance. Most (98%) of the FEMA IHP applicants do not have flood insurance. Not all FEMA registrations include household income information (18%), so there is a discrepancy between the total number of households and the number of households that reported income.

Table 14: IHP Applicants by Income Limits

Income Category	Count	# Without Flood Insurance	% Without Flood Insurance
Low and Moderate Income	1,387	1,347	97%
Extremely Low Income	2,958	2,921	99%
Very Low Income	2,401	2,354	98%
Over 80% AMI	559	535	96%
All Households	8,928	8,764	98%

Total Home Loans Approved by SBA

Table 15: Number of SBA Home Loans (Provided by SBA Sept 2023)

County	# of Claims Approved
St. Clair	211

Calculating Housing Unmet Need

As stated in the Federal Register Notice, HUD notes:

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 based on a fuzzy match at the block group level comparing FEMA and SBA inspections.¹⁰

While St. Clair County does have SBA Home Loan data at the address level to conduct this approved methodology, only 2 homes were marked as “reconstruction”, which is an inadequate sample. The average verified loss of FEMA IHP properties with Major/Severe Damage is \$12,024. The FEMA IHP-verified losses undervalue the cost of reconstruction for the damaged properties, and under 10 households for SBA does not represent an adequate sample. Despite these limitations, St. Clair County will use the HUD multiplier using Major/Severe damaged properties (\$12,024) for its multiplier.

¹⁰ <https://www.govinfo.gov/content/pkg/FR-2022-02-03/pdf/2022-02209.pdf>70

Table 16: Housing Impact by Damage Category

Damage Category	Owner - Count	Owner - Total Damage	Renter - Count	Renter - Damage	Total - Count	Total - Damage
Major-Low	436	\$5,053,415	3	\$8,161	436	\$5,061,576
Major-High	105	\$2,033,034	3	\$14,818	108	\$2,047,852
Severe	11	\$345	0	\$0	11	\$345
Total	552	\$7,432,147	6	\$22,979	558	\$7,455,126

Social Equity, Fair Housing and Civil Rights

St. Clair County is committed to Affirmatively Furthering Fair Housing through its disaster recovery efforts. All St. Clair County programs will comply with all relevant fair housing laws including the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. As well as the Elliot-Larsen Civil Rights Act (also known as Public Act 220 of 1976) which provides additional protection against housing discrimination based on religion, race, color, national origin, age, sex, height, weight, familial status, or marital status, and the Illinois Human Rights Act (775 ILCS5/). The Program Design section of this Action Plan provides further details on how fair housing requirements will be incorporated into CDBG-DR program design, policies and procedures, and program implementation.

St. Clair County does not anticipate that any of its programs will create or exacerbate barriers to housing. The programs will support communities in their development by investing in infrastructure.

This section focuses on reviewing available data to understand the make-up of populations impacted by the disaster, which will serve as the basis for disaster recovery program design.

This section includes analysis of the following within the HUD-identified MID (St. Clair County):

- Racial and ethnic makeup of populations
- Renter and homeowner demographics
- Limited English Proficiency populations
- Persons with disabilities
- Federally Protected Classes
- Indigenous populations and tribal communities
- Racially and ethnically concentrated areas of poverty

Racial and ethnic makeup of populations

According to the 2017-2021 ACS 5-Year Estimates¹¹, White was the largest racial group in St. Clair County (60.6%), followed by Black or African American (29.0%), followed by 4.35% of the population identifying as Hispanic or Latino.

Table 17¹¹: Race and Ethnicity

Race	Count	% Total
White or Caucasian	156,751	60.62%
Black or African American	74,992	29.0%
Hispanic or Latino	11,248	4.35%
Two + Races	10,421	4.03%
Asian	356	0.14%
Am. Indian or Pacific Isl.	43	0.02%
Some Other Race	1,202	0.46%
Total Population	258,597	

Renter and Homeowner Demographics

In St. Clair County, the highest percentage of occupied housing units by race are owner occupied housing units by white households at 51.39%. When looking within renter-occupied units alone, most renters remain white (44.3% vs. 39.1% Black), though within home ownership the disparity is greater (51.39% of homeowners are White vs. just 12.73% Black). With such high disparity, protected classes, such as African Americans could experience difficulty with decreasing housing affordability, segregated housing patterns, and lack of housing choice.

¹¹ American Community Survey 5-year estimates 2017-2021 Table S0201 Selected Population Profile in the United States [Census Bureau Tables](#)

Table 18: Household Race and Ethnicity by Tenure Type

Race	Occ. Housing Units	% Owner-Occupied	% Renter Occupied
White or Caucasian	64,054	51.39%	13.36%
Black or African American	24,265	12.73%	11.8%
Hispanic or Latino	4,075	2.62%	1.5%
Two + Races	8,021	3.99%	4.12%
Asian	1,227	.86%	0.38%
Am. Indian or Pacific Isl.	321	N	N
Some Other Race	1,038	.53%	.51%
Total Occ. Housing Units	98,926	69.82%	30.18%

Source: American Community Survey S2502: 5-Year Estimates (2017-2021)

Limited English Proficiency populations

Among people at least five years old living in St. Clair County only 1.5% speak another language at home and indicate they speak English “less than very well”, with the highest percentage being Spanish at .83%.

According to the language access plan, St. Clair County completed a four-factor analysis to determine an appropriate level of language access for the CDBG-DR program and to ensure meaningful access by LEP individuals to critical services.

Table 19: Language Spoken if English is not proficient

Primary Language Spoken	Number who speak English less than very well	Percentage who speak English less than very well
Spanish	2,014	.83%
German	218	.09%
Chinese	262	.11%
Other Indo-European	208	.09%
Arabic	118	.05%
Other Asian	190	.08%
Russian	71	.03%
Tagalog	182	.08%
Vietnamese	43	.02%
Korean	174	.07%
Other NOS	81	.03%

Source: American Community Survey S1602: 5-Year Estimates (2017-2021)

Persons with Disabilities

According to 2017-2021 ACS 5-year estimates¹², 14.2% of the total county population had a disability, which is 1.6% higher than the national rate. In addition to barriers such as housing discrimination and the difficulty of finding accessible units, people with disabilities face financial hardships at rates much higher than the average person. In St. Clair County, only 29.4% of disabled individuals are currently in the labor force versus 67.6% of the non-disabled population¹³. Furthermore, when disabled persons are employed, they earn significantly less than the non-disabled. The median earnings for disabled persons is \$25,672, while median earnings for non-disabled person is \$37,267. In light of these challenging economic conditions, decent and affordable housing remains a difficulty for a large portion of the disabled population.

Table 20: Disability Status by Age

Age	Count	Percentage
Under 5	141	0.9%
5-17	2,482	5.5%
18-34	4,943	9.6%
35-64	14,637	14.6%
65-74	6,293	26%
75+	7,442	47.3%

Source: American Community Survey S1810: 5-Year Estimates (2017-2021)

Indigenous populations and tribal communities

While there are no federally recognized tribes in the State of Illinois, the HUD Tribal Directory Assessment Tool does list 24 tribes as having interests in IL.¹⁴

Historically distressed and underserved communities

St. Clair County is not listed as a 2022 Distressed or Underserved nonmetropolitan Middle-Income Geography, though areas within are such.¹⁵

Racially Concentrated Areas of Poverty (R/ECAP)

HUD defines Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) as an area where a significant number of racial and/or ethnic minorities live in poverty. HUD has developed a census tract-based definition of R/ECAPs.¹⁶ The definition involves a racial/ethnic

¹² 2017-2021 ACS 5-Year S1810

¹³ 2017-2021 ACS 5-year estimates S1811

¹⁴ <https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes>

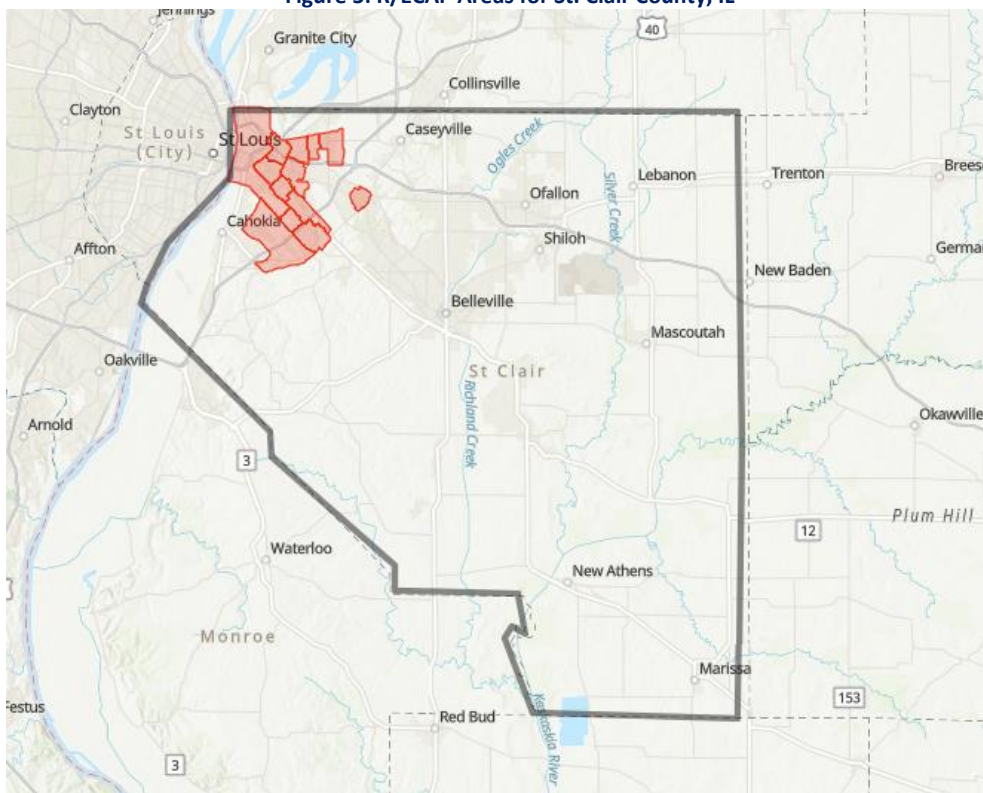
¹⁵ <https://www.ffiec.gov/cra/distressed.htm>

¹⁶ United States. American Community Survey (ACS), 2009-2013; Decennial Census (2010). Retrieved from

concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. HUD uses a definition of extreme poverty as census tracts with 40% or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy racial/ethnic concentration threshold are deemed R/ECAPs.

There are 13 R/ECAP census tracts in St. Clair County²³, all of which are in the northwest corner of the County and largely overlap with the most impacted areas from this disaster event.

Figure 5: R/ECAP Areas for St. Clair County, IL



Proximity of Natural Hazards

The Environmental Protection Agency (EPA) Priorities List (SEMS_NPL) is a current list of Superfund sites, three of which are in St. Clair County.¹⁷ Again, these are in the northwest corner of the County and are within the areas that the FEMA data indicate were heavily

<https://www.arcgis.com/home/item.html?id=56de4edea8264fe5a344da9811ef5d6e>

¹⁷ United States. Environmental Protection Agency (EPA).

https://services.arcgis.com/cj9YHowT8TU7DUyn/arcgis/rest/services/FRS_INTERESTS_SEMS_NPL/FeatureServer

impacted by this event.

These sites include the Old American Zinc Plant (45th/Cookson, Fairmont City 62201), and Sauget Area 1 and 2. All three of which are in Zip code 62201.

Figure 6: Superfund National Priorities List Map



Source: EPA Facility Registry Service, updated November 2022

EPA EJSCREEN

To measure environmental justice, exposure to polluting and toxic environmental harms, and socioeconomic factors, the following maps were pulled from the Environmental Protection Agency's EJScreen: Environmental Justice and Mapping Tool. The socioeconomic indicators shown include population under 5, population over 64, People of Color - percent of individuals in a block group who list their racial status as a race other than white alone and/or list their ethnicity as Hispanic or Latino, and limited English speakers – percent of people in a block group living in limited English speaking households, defined as a household in which all members age 14 years and over speak a non-English language and also speak English less than "very well"¹⁸. The colors on the map correlate with national percentile concentrations of these subpopulations. The EJScreen explains the percentiles this way: "if your results indicate that an area is 48% minority and is at the 69th national percentile, this means that 48% of the area's population is minority, and that is an equal or higher %

¹⁸ <https://www.epa.gov/ejscreen/overview-socioeconomic-indicators-ejscreen> & <https://ejscreen.epa.gov/mapper/>

minority than where 69% of the US population lives.”²⁷

The maps below show that compared to national percentiles St. Clair County has a higher than national concentration of People of Color, particularly in the NW corner of the County, extending just beyond the I-255 loop.

The County does not, however, have many areas with limited English speaking though there are a few spots in the 80-90th percentile range.

Age risk factors (both under 5 and over 64) are spread throughout the county and do not coincide with any other factors. These are important metrics for vulnerability as the Centers for Disease Control and Prevention’s (CDC) Social Vulnerability Index states “children and elders are the most vulnerable groups in disaster events.”¹⁹ It is important to account for households with children in disaster planning and recovery as children face increased vulnerability to psychological stress and post-traumatic stress disorder, educational disruptions, and physical vulnerability from disasters.²⁰ Parents with young children may face increasing financial difficulties and stress from interrupted childcare and may face difficulties in returning to work.²¹ Households with adults over age 65 also face increased hardships from disasters due to an increased likelihood of “chronic illness, functional limitations, or dementia” which can complicate both the danger of the disaster event and recovery.²² A 2005 AARP poll found that “13 million persons age 50 or older in the United States say they will need help to evacuate, and about half of these individuals will require help from someone outside of their household.”²³ During the recovery phase of a disaster, it may be more difficult for older adults to access needed medicines or travel to social service agencies. Furthermore, many older adults live on a fixed income and may suffer from financial hardships after a disaster.

¹⁹ United States. Centers for Disease Control and Prevention (CDC). (2020, January 31). *CDC SVI Documentation 2018*. Retrieved from https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2018.html

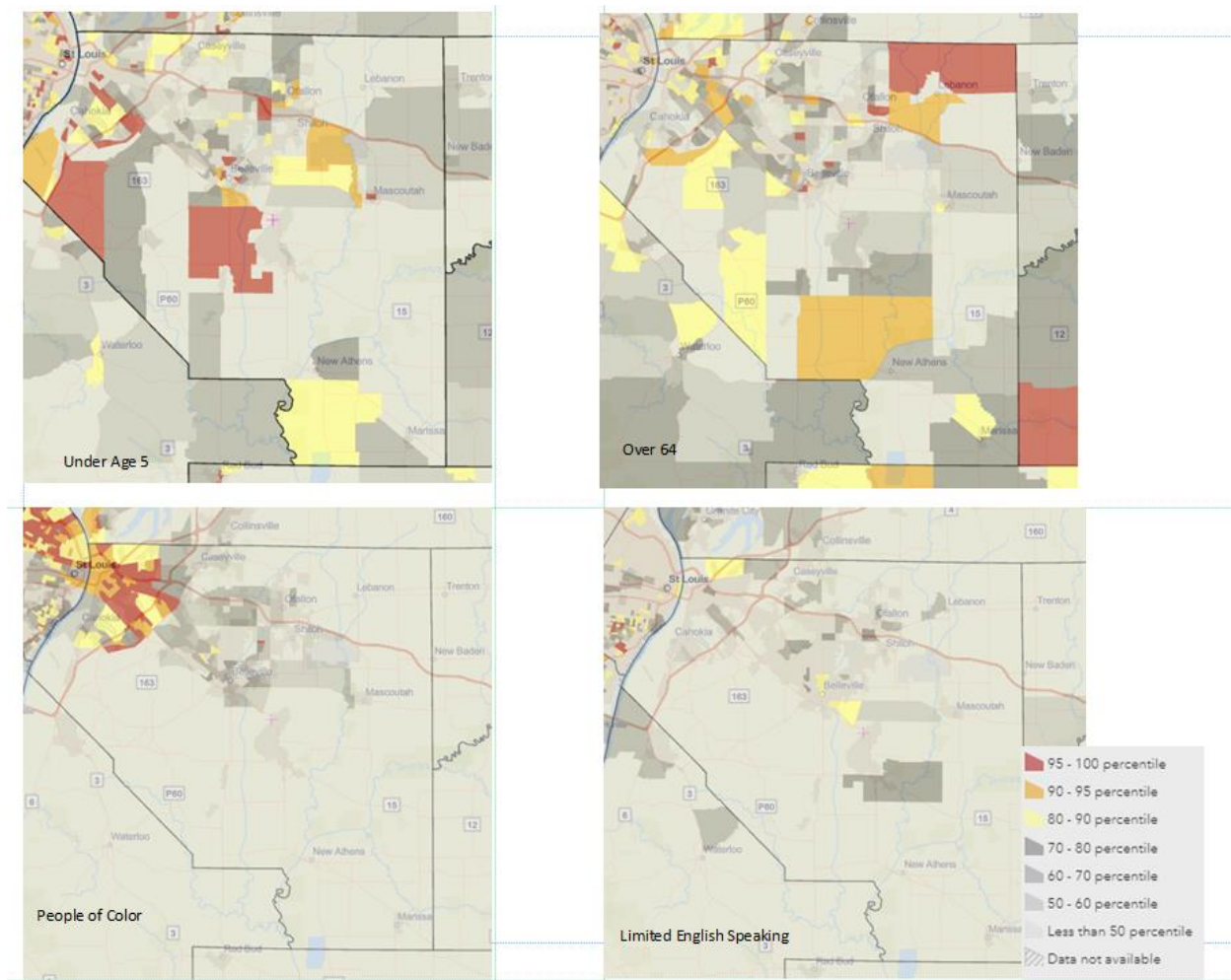
²⁰ Lori Peek, “Children and Disasters: Understanding Vulnerability, Developing Capacities and Promoting Resilience: An Introduction”, *Children Youth and the Environment*, 2008. <https://www.jstor.org/stable/10.7721/chilyoutenvi.18.1.0001>

²¹ Carolyn Kousky, “Impacts of Natural Disasters on Children”, Spring 2016. <http://www.futureofchildren.org/publications/docs/Climate%20Change%20Full%20Issue.pdf> (ed.gov)

²² CDC “Disaster Planning Tips for Older Adults and their Families”. https://www.cdc.gov/aging/pdf/disaster_planning_tips.pdf

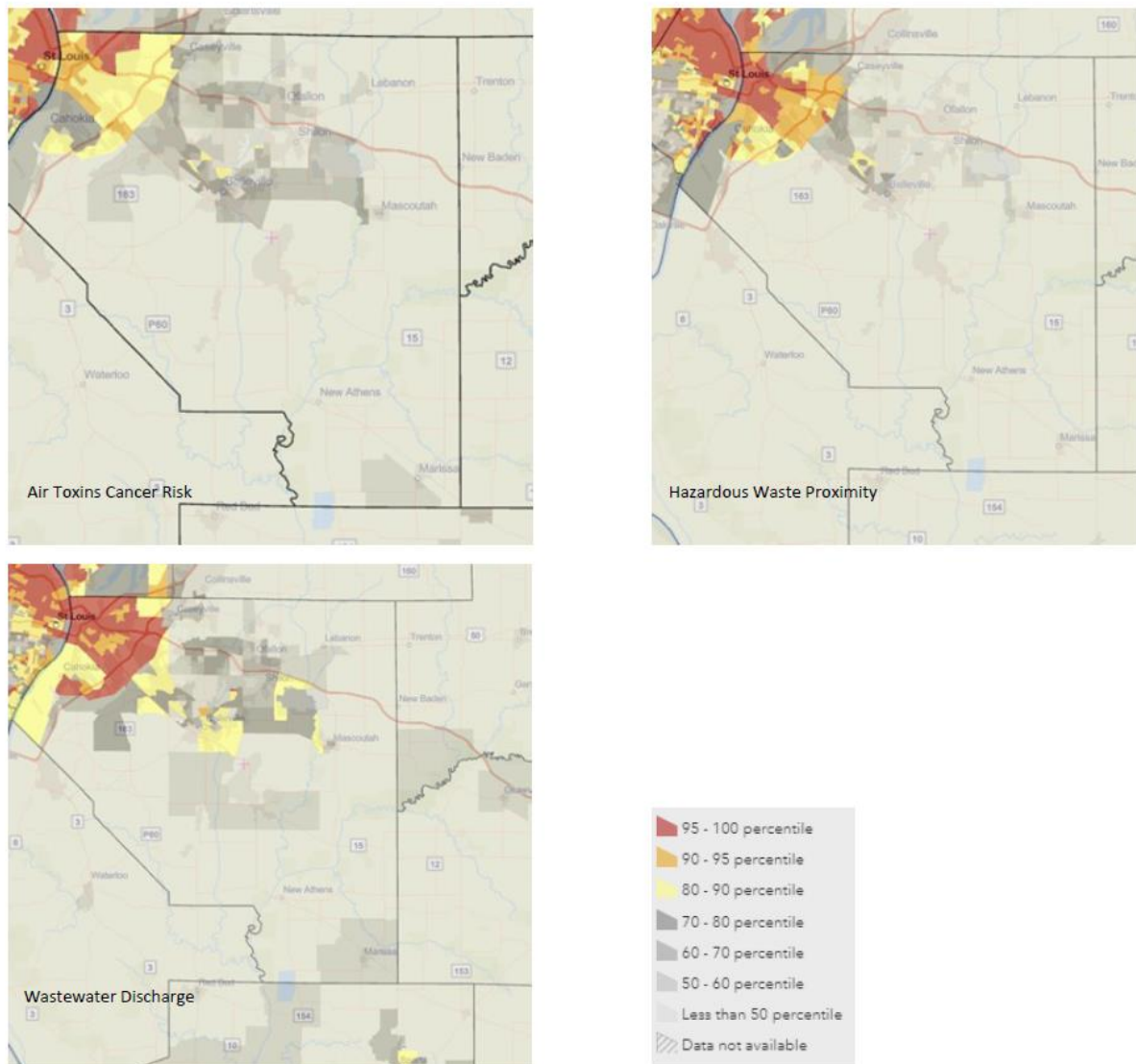
²³ AARP, Mary Jo Gibson & Michelle Hayunga, “We Can Do Better: Lessons Learned for Protecting Older Persons in Disasters”, 2006. <https://assets.aarp.org/rgcenter/il/better.pdf>

Figure 7: EJ Screen Demographic Maps



The environmental justice screening, however, shows that St. Clair County has areas where there are four or more indicators (air toxic cancers risk, superfund proximity, hazardous waste proximity, and wastewater discharge) above the 80th percentile nationally. These areas are clustered in the same census tracts of the northwest portion of the county that was highly affected by this event, and which show the highest concentrations of people of color in the County.

Figure 8: EJ Screen Results



St. Clair County will aim to mitigate environmental concerns identified above through its CDBG-DR programs by:

- Limiting the proximity of new multifamily housing to these sites.
- Encouraging local resilience planning that focuses on climate risks and preparedness.
- Encouraging green infrastructure building and practices across the Infrastructure and Public Facilities and Multifamily Housing programs.
- Screening and evaluating scope in the applications to consider the specific location of projects and plan accordingly for the specific hazards and natural features that would affect impacted and vulnerable populations.

Federally Protected Classes Analysis

In 2021, President Joe Biden signed Executive Order 14008, Tackling the Climate Crisis at Home and Abroad. The Executive Order states that “40% of the overall benefits” of federal investments from covered programs should flow to disadvantaged communities.²⁴ This ensures that any federal funds directed toward climate mitigation and adaptation largely benefit historically underserved communities. One of the ways that agencies and covered programs benefit disadvantaged communities is by identifying target populations with the Centers for Disease Control and Prevention’s (CDC) Social Vulnerability Index.

The CDC’s Agency for Toxic Substances and Disease Registry’s (ATSDR) Social Vulnerability Index (SVI) ranks counties and census tracts on 15 social factors, including unemployment, minority status, and disability, and then further groups them into four related themes. The SVI ranking variables for the four themes include Socioeconomic Status, Household Composition & Disability, Minority Status & Language, and Housing Type & Transportation. These indicators help support analysis on the relative vulnerability of a given census tract and help identify communities that will need continued support to recover following an emergency or natural disaster.

The infographic below²⁵ shows the overall summary from the CDC and Agency for Toxic Substances and Disease Registry’s (ATSDR) Social Vulnerability Index for 2020. The northwest corner of the County remains the area of highest concern/vulnerability.

However, germane to this action plan the Housing Type/Transportation them in blue (bottom right box) indicates a few other tracts having high vulnerability in those areas which are of high concern during flooding or other emergency events.

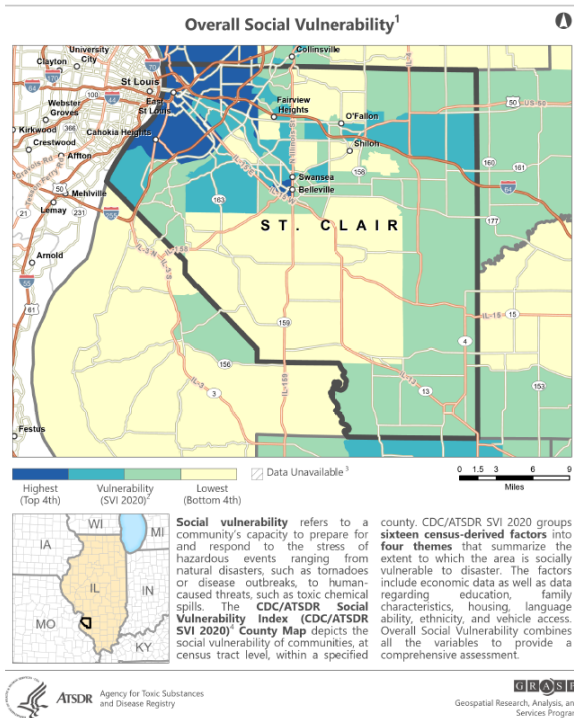
²⁴ Office of Management and Budget, Implementation Guidance for the Justice40 Initiative, <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>

²⁵ https://www.atsdr.cdc.gov/placeandhealth/svi/interactive_map.html

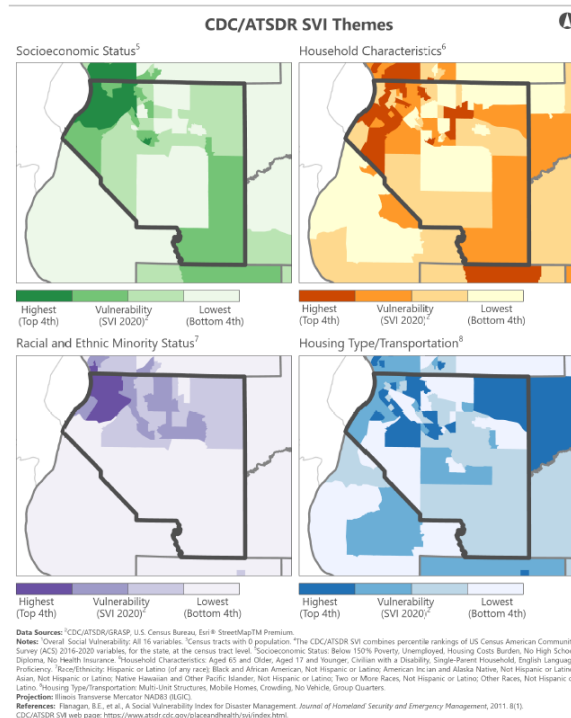
Figure 9: CDC/ATSDR Social Vulnerability Index Infographic

CDC/ATSDR Social Vulnerability Index 2020

ST. CLAIR COUNTY, ILLINOIS



CDC/ATSDR SVI 2020 – ST. CLAIR COUNTY, ILLINOIS



In planning the use of funds, it is critical to include vulnerable and historically underserved populations. As such, St. Clair County must assess all programs to evaluate the equity and impact on protected classes. Disaster impacts racial and ethnic minorities disproportionately due to an increased exposure to disasters caused by racial bias in housing, socioeconomic differences and potential lack of resources, and potential cultural and language barriers that threaten recovery resources.²⁶

Minority populations are more likely to be uninsured and not have sufficient resources to recover from a disaster. As we saw in Table 14, regardless of income over 96% of persons receiving IHP assistance in this disaster were without flood insurance, and most of the FEMA assistance went to high-minority zip codes in the northwestern portion of the county.

Circling back to the discussion started in the EJSscreen section on Children and the Elderly, when disaster strikes, households with children and/or seniors have additional needs including helping children cope with recurring trauma from being displaced from their communities and schools, and the loss of all their belongings. Seniors disproportionately face additional costs related to replacing medical equipment and face similar temporary and

²⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5314923/#:~:text=While%20all%20members%20of%20population s.and%20more%20affected%20by%20disasters.&text=During%20Hurricane%20Katrina%2C%20the%20large.designated%20shelters%20were%20disproportionately%20black>

permanent housing accessibility challenges faced individuals living with disabilities. There are 15,955 children under the age of 5 and just over 41,000 seniors living in St. Clair County, representing approximately 22% of the County's overall population²⁷. While all these residents may not have experienced direct housing losses from DR-4676 the trauma and additional strains on existing resources may have a disproportionate impact on services and housing available to accommodate children and seniors.

Persons with disabilities also have similarly additional challenges. They may have less mobility, need special equipment to evacuate, and many have service animals that need to be considered when a disaster occurs. Persons with disabilities face disproportionate challenges in finding suitable housing to accommodate their special needs and the additional costs for accessible safe permanent housing. The World Health Organization states that "people with disabilities may be less able to escape from hazards, may lose essential assistive devices such as spectacles, hearing and mobility aids and/or medications, or may be left behind when a community is forced to evacuate" as well as having "greater difficulty accessing basic needs" and also may face a reduced "capacity of caregivers and care settings".²⁸ In 2021, the Americans with Disabilities Act was expanded to include provisions that all programs and services from States and local governments prohibit any discrimination against people with disabilities, and also address the need to include access and accommodation in all aspects of emergency planning and recovery.²⁹

While not every person with a disability may have experienced a direct impact from the disasters, the data informs how the programs will be made available to any person with a disability that was directly impacted by the disaster and making their social community more resilient for any future disasters.

Data sources on sexual orientation and gender identity, are not available at the County level in the most recent Census and American Community Survey data, but rather only at the State level, which may or may not represent St. Clair County. However, it is worth noting that many governmental programs fail to recognize LGBTQIA+ family structures, and that many disaster-relief and recovery services are faith-based which may further marginalize impacted persons within this community. As such, St. Clair County will seek to be cognizant of any impact or unmet needs within this community despite a deficit of demographic data.³⁰

²⁷ American Community Survey 2017-2021 Table S0101

²⁸ World Health Organization, "Guidance note on disability and emergency risk management for health", December 2, 2013. <https://www.who.int/publications/i/item/guidance-note-on-disability-and-emergency-risk-management-for-health>

²⁹ <https://www.fema.gov/blog/three-ways-americans-disabilities-act-supports-equity-and-independence-people-disabilities>

³⁰ <https://disasterphilanthropy.org/resources/lgbtqia-communities-and-disasters/>

Income Demographics

The income table below illustrates that St. Clair County has a lower median household income and per capita income than both the statewide amount, and the amount for the larger MO-IL Metro region to which it belongs.

St. Clair County also has 34,603 (13.6%) people for whom income during the past 12 months was below poverty level, which is again greater than the State as a whole or the Metro area. People living in poverty are especially vulnerable to disasters because they are more oftentimes at greater risk of exposure due to being more likely to live in high-risk areas, losing a greater portion of their wealth when disaster hits, and having a lower ability to recover from disasters.

Table 21: Median Household Income

Income/Economic Demographics	Statewide	St. Clair County	MO-IL Metro Area
Median Household Income	\$72,563.00	\$63,017.00	\$101,200.00
Per Capita Income	\$39,571.00	\$32,949.00	\$39,168.00
Income in the past 12 months below poverty level	1,483,378 (11.8%)	34,603 (13.6%)	289,903 (10.5%)

Source: American Community Survey B19301 & S1701: 5-Year Estimates (2017-2021)

The table below illustrates the number and percentage of LMI persons at the County and State level. Because all HUD recovery programs must meet an overall LMI benefit to expend 70% of the total allocation on activities that benefit LMI persons, it is important to understand the geography of low- and moderate- income persons in disaster impacted areas. St. Clair County has a higher percentage of LMI persons than the state, particularly in the most affected census tracts in the northwestern portion of the county.

Table 22: LMI Analysis – St. Clair County

County	Total LMI Persons	Total Population	Percent LMI
St. Clair	123,445	263,170	46.91%
State Total	5,412,861	12,572,576	43.05%

Source: HUD 2011 – 2015 LMI: <https://hud.maps.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd>

The Supplementary Nutrition Assistance Program (SNAP) provides nutrition benefits to families who may struggle with food budgets so that they can “purchase healthy food and move towards self-sufficiency”.³¹ Eligibility for the program is based on the financial situation of all members in a household. Everyone who lives together and purchases and

³¹ USDA Food and Nutrition Services US Department of Agriculture, “Supplemental Nutrition Assistance Program (SNAP), accessed July 2020, <https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program>

prepares food together is considered a member of the same household group and considered together in the application process. The Disaster-Supplementary Nutrition Assistance Program (D-SNAP) provides a one-time benefit during the disaster benefit period to aid in food-assistance for households that are not covered under regular SNAP.³² While that data is not yet available, the table below shows the growth in number of SNAP households in the months immediately after the disaster.

Table 23: SNAP and D-SNAP Applicants

County	Avg. # of SNAP Households May-July 2022	Avg. # of SNAP Individuals May-July 2022	Avg. # of SNAP Households Aug-Dec 2022	Avg. # of SNAP Individuals Aug - Dec 2022	% Change Pre/Post Disaster in HH Needs
St. Clair	28,265	52,987	28,644	53,578	+13.4%

Source: Illinois Dept of Human Services: <https://www.dhs.state.il.us/page.aspx?item=56952>

It is important to note the amount of population with Limited English Proficiency in disaster areas as language and cultural differences could serve as a serious barrier to understanding disaster directives and communicating with first responders and emergency providers during a disaster. After the disaster, the barriers may affect accessing recovery services.³³ The Civil Rights Act of 1964 prohibits discrimination on the basis of national origin and requires that government entities ensure that persons with Limited English Proficiency (LEP) have access to the same benefits, services, and information as English-speaking residents. As such, disaster preparedness and recovery must consider and plan for those who need translators and translated materials.

The tables below show the total and percentage LEP populations in St. Clair County. Although St. Clair County has a percentage who speak English less than “very well” that is much less than the statewide percentage, disaster recovery should consider any impacted groups who may need translations for outreach and materials.

Table 24: Limited English Proficiency Breakdown of Disaster-Related Areas

County/Municipality	Estimate Speak English Less than 'Very Well'	Percent Speak English Less than 'Very Well'
St. Clair	3,640	1.5%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates.

³² USDA Disaster Assistance: <https://www.disasterassistance.gov/get-assistance/forms-of-assistance/5769>

³³ Sharyne Shiu-Thornton, Joseph Balabis, et al., “Disaster Preparedness for Limited English Proficient Communities: Medical Interpreters as Cultural Brokers and Gatekeepers, Public Health Reports, 2007 Jul-Aug. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1888520/>

Comprehensive disaster recovery needs to consider the needs of people experiencing homelessness as many formal supports (shelters and supportive services) and informal supports (e.g., community resource sharing) may be impacted. People experiencing homelessness are especially vulnerable to disasters as they could be at heightened risk of losing what HUD terms their “margin of stability” leading to an increased risk of death, injuries, illness, and mental health crises.³⁴ The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988, which authorizes presidentially declared disaster areas, protects individuals from discrimination on many bases including economic status in all disaster assistance programs in presidentially declared disaster areas.³⁵

The tables below illustrate a one-night count of unhoused people in St. Clair County for 2023. These counts measured the number of sheltered and unsheltered persons experiencing homelessness in the continuum of care jurisdiction. The results of the count indicate that there were 264 homeless persons in St. Clair County. It should be noted, however, that homeless counts often undercount the unsheltered population as it may miss people who are hidden from view, and does not count those who are “couch surfing” or may have other precarious living arrangements (e.g., motels, hotels, camping grounds).³⁶

Table 25: Point-in-Time Count – Type of Shelter

County	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
St. Clair	162	93	9	264

The tables below list the total Housing Choice Vouchers, Low-Income Housing Tax Credit (LIHTC) units, and public housing dwelling units in St. Clair County. The map below shows that these housing options are unevenly distributed throughout the county, and that the areas with the highest number of these options are also the areas that suffered the most because of this flooding disaster.

³⁴ HUD Exchange, Disaster Recovery Homelessness Toolkit, “Why this Guide: The Consequences of Disasters for Homeless and Other Vulnerable People”, Accessed July 2022. <https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/response-guide/>

³⁵ HUD Exchange, Disaster Recovery Homelessness Toolkit, “Why this Guide: The Consequences of Disasters for Homeless and Other Vulnerable People”, Accessed July 2022 <https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recovery-guide/>

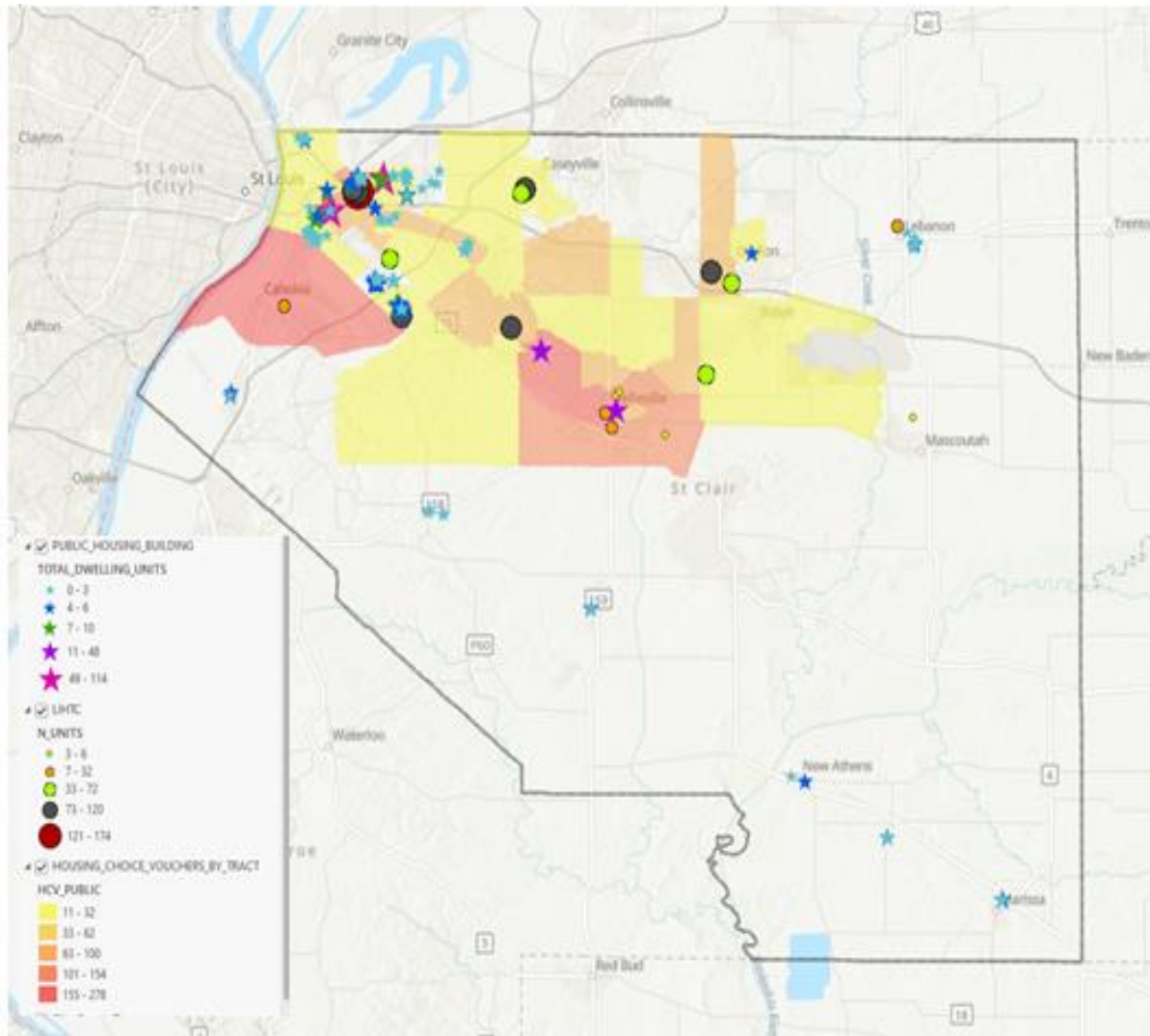
³⁶ Alastair Boone, “Is There a Better Way to Count the Homeless?” CityLab, March 4, 2019. <https://www.bloomberg.com/news/articles/2019-03-04/the-problem-with-hud-s-point-in-time-homeless-count>

Table 26: Assisted Housing Impacted by Disaster

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
St. Clair	2,158	N/A	1.1K (104 under 10 yrs Svc)	N/A	2,349	N/A	N/A

Source: US Dept. of Housing and Urban Development Open Data: <https://hudgis-hud.opendata.arcgis.com/>, August 07, 2023

Figure 10: Housing Choice Vouchers by Tract:



Infrastructure Unmet Need

St. Clair County's emergency agency has identified considerable impacts on public facilities and infrastructure from the July 2022 heavy rains that led to the catastrophic flooding across the county.

Roads and Bridges

There were many roads that were impassable due to the flood waters. It took several days for water to recede in some places.

Buildings and Equipment

The St. Clair County Animal Control Building sustained substantial damage during this flooding event forcing the relocation of all animals. The building remained closed for an extended period due to this flooding. The City of Belleville Police Station was inaccessible for 12 hours during the flood event.

Other Impacts

Several communities have issues with poor drainage due to the flooding which impacts the living conditions of those in the area.

Disaster Damage and Impacts – Infrastructure

FEMA's Public Assistance Program (PA) provides supplemental grants to State, tribal, territorial, and local governments, and certain types of private nonprofits so that communities can quickly respond to and recover from major disasters or emergencies. FEMA also encourages the protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process. St. Clair County was deemed ineligible for this assistance for DR-4676.³⁷

Disaster Damage and Impacts - Economic Revitalization

All disasters result in economic impacts, from business disruption to disaster related unemployment. Businesses and private industry structures, including restaurants, shops, grocery stores, gas stations and other businesses, were destroyed, threatening the ability for communities to have access to the services needed for residents to come back. The impact varied from community to community.

³⁷ <https://www.fema.gov/disaster/4676/designated-areas#public-assistance>

Unemployment Rates

Prior to the July 2022 disaster, the County was continuing to experience significant economic impacts resulting from the COVID-19 pandemic. According to the U. S. Bureau of Labor Statistics, the unemployment rate in St. Clair County jumped from around 3.4 in February 2020 to 16.2 in April 2020, the highest in 20 years (the previous peak being 11.9 in 2009). While some recovery is evident, the rate was still raised to around 4.3 in July of 2022³⁸

Small Business Administration (SBA) Commercial Losses

The SBA offers Economic Injury Disaster Loans (EIDL) and Business Disaster Loans to businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations, such as public service, faith-based, and private universities, also are eligible. The law limits business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

For the 2022 disaster, DR 4676, there were 320 SBA business loan applications, totaling just over \$22 million in verified losses. Of these applications, only 33 loans were approved, covering just over 8% of the total verified losses, and only 73% of losses seen by the 33 approved loans.

While the SBA data provides insight into businesses that applied for assistance, this does not reflect the full impacts of the disaster. St. Clair County continues to work with the local governments, chambers of commerce, state agencies, and impacted areas to further refine the economic impact and unmet economic recovery needs.

Total Business Loans Approved by the SBA

Table 27: Total Business Loans Approved by the SBA

County	Total Business/EIDL Loan Applications	Total Approved
St. Clair County	320	33

³⁸ <https://fred.stlouisfed.org/series/ILSTURN>

SBA Business Loan Data

Table 28: SBA Disaster Loan Data

Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
St. Clair County	\$22,179,003.43	\$1,871,400,	\$20,307,603.43

Unmet Needs Summary

This section includes a summary of the total impacts from the 2022 disaster, the total resources available, and the total unmet recovery needs. St. Clair County will continue to monitor the data available and continue its consultations with impacted areas and residents to ensure it collects the most current data available. Infrastructure unmet need is not included in the table below because FEMA PA was not made available for this disaster. However, addressing critical infrastructure failures will increase housing and business resiliency from future flooding disasters.

Unmet Needs Summary

Table 1: Unmet Needs and Proposed Allocations

Category	Total Verified Loss	Remaining Unmet Need	% of Need Unmet	Program Allocation Amount
Housing (FEMA IA)	\$17,590,019.77	\$319,083.38	1.81%	\$17,270,936.39
Housing (SBA Home)	\$18,390,917.72	\$11,851,017.72	64.44%	\$6,539,900.00
Economic (SBA Business/EIDL)	\$22,179,003.43	\$20,307,603.43	91.56%	\$1,871,400.00
Total	\$58,159,940.92	\$32,477,704.53	44.15%	\$25,682,236.39

Mitigation Needs Assessment

The Multi-Hazard Mitigation Plan is a risk-based assessment that consists of three components: hazard identification, vulnerability assessment, and risk analysis. The plan was completed in 2019 and will inform the use of the 15% CDBG-MIT set-aside and to help build resilience and mitigation measures into recovery programs and projects.

Importantly, this assessment looks at any natural hazard likely to affect St. Clair County, including flooding, extreme heat, severe winter weather, tornado, and severe thunderstorms. These hazards were identified in Illinois's FEMA-approved Hazard Mitigation Plan (HMP) as

well as the plan for St. Clair County.

This assessment will provide a basis upon which to propose programs and projects as part of this plan that will mitigate current and future hazards. In addition, it will inform all projects undertaken through CDBG-DR such that, at a minimum, they do not exacerbate natural hazard threats and make use of scarce resources for recovery and mitigation.

As part of this assessment, the county also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions and/or are critical to human health and safety, and economic security.

State Hazard Mitigation Plan

The Illinois Natural Hazard Mitigation Plan (INHMP) provides the framework for hazard mitigation not only during the recovery and reconstruction process, but on a year-round basis to identify current and proposed mitigation projects that will reduce the potential for future losses and decrease the costs to taxpayers. The INHMP is used to increase awareness and initiate development of long-range, interagency, multi-hazard mitigation activities to be administered by the Illinois Emergency Management Agency (IEMA) and the Interagency Mitigation Advisory Group (IMAG) for the State of Illinois. The INHMP shall address those natural hazards that have resulted in claims for Federal assistance, as well as other major natural hazards identified as presenting substantial risk to human life and private and public property. Importantly, the INHMP is required by FEMA for states to access Hazard Mitigation Assistance funds.

The INHMP identifies 7 natural hazards that have occurred in the past and in all probability will continue to impact Illinois at various levels of severity and frequency, including:

- Severe Storms
- Tornadoes
- Floods
- Drought
- Extreme Heat
- Severe Winter Storms
- Earthquake

Illinois lies midway between the Continental Divide and the Atlantic Ocean, and the state's southern tip is 500 miles north of the Gulf of Mexico. Illinois' climate is typically continental with cold winters; warm, humid summers; and frequent short fluctuations in temperature, precipitation, humidity, cloudiness, and winds. Illinois received 22 federal disaster declarations (17 major disaster declarations and five emergency declarations) between

2000 and 2017, and 31 gubernatorial disaster proclamations between 2010 and 2018 (IEMA).

Severe Storms

All Illinois counties are susceptible to severe storms. At any one time, it has been determined that over 25% of the county population might experience severe storms. This determination is supported by Mr. Chris Miller, Warning Coordination Meteorologist, National Weather Service (NWS), Lincoln, Illinois, as follows: "Damage from severe thunderstorms is usually on a much broader spatial scale in the state of Illinois. Illinois averages more than 500 reports of wind damage and nearly 375 reports of large hail annually. Approximately 80% of the severe thunderstorms are multicellular or a supercell hybrid, which are capable of producing damaging wind and/or large hail over approximately a 400 to 500 square mile area. The remainder of severe thunderstorms are squall lines, which can produce damage over 100% of the affected counties. Thus, the vulnerability to severe thunderstorms should be high (greater than 25% of the population affected) in each county across Illinois.

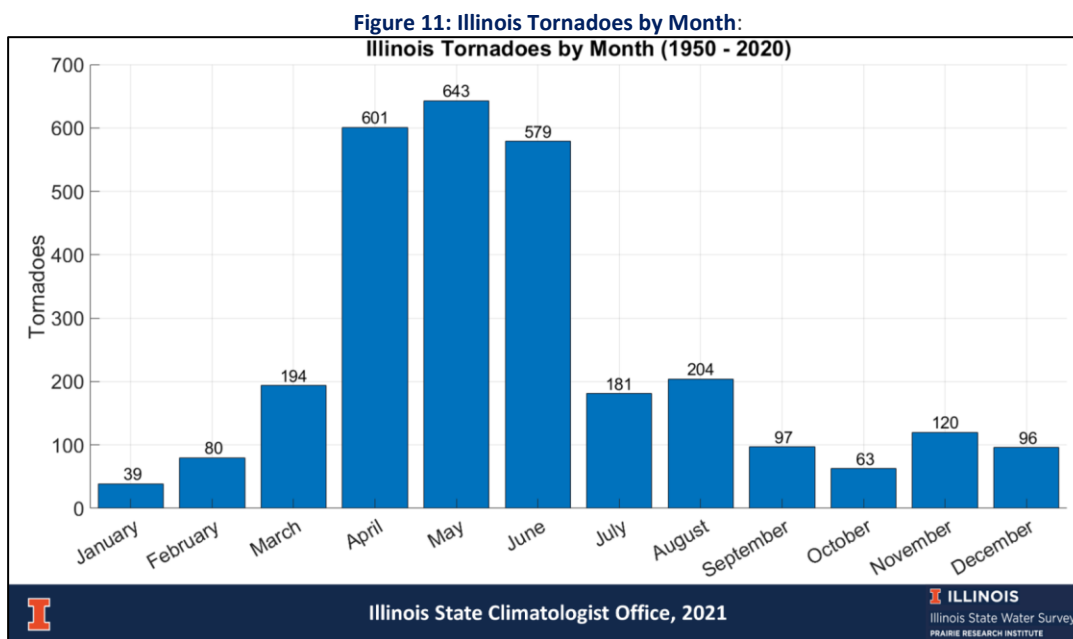
In Illinois, thunderstorms occur when there is a collision of moist, warm air moving north from the Gulf of Mexico with colder fronts moving east from the Rocky Mountains resulting in cold air overriding a layer of warm air causing the warm air to rise rapidly. Thunderstorms may occur singly, in clusters, or in lines. In the course of a few hours, it is possible for several thunderstorms to affect one location or a single thunderstorm to affect one location for an extended time. Thunderstorms typically are 15 miles in diameter and produce heavy rain anywhere from 30 minutes to an hour. Of the estimated 100,000 thunderstorms each year, approximately 10 percent are classified severe. Severe storms either produce hail at least one inch in diameter, have winds of 58 miles per hour or higher, or produce a tornado. In Illinois, severe thunderstorms frequently occur in the late afternoon or evening. Thunderstorms can bring heavy rain, strong winds, hail, lightning, and tornadoes. Thunderstorms can cause several types of damaging wind. The public is not as familiar with the extent of damage that may accompany a downburst or straight-line winds as they are with tornadoes. In thunderstorms, straight-line winds are winds without any rotation. This classification differentiates them from tornadic winds. In severe thunderstorms, downbursts are created by falling rain and associated sinking air, resulting in winds that can reach speeds of 125 mph.

Tornados

Illinois is situated on the northeast edge of "tornado alley," the tornado-prone area that extends approximately 400 miles on either side of a line from Fort Worth, Texas, to Detroit, Michigan. This area is the battleground of warm, moist air from the Gulf of Mexico and cold air from Canada, resulting in the world's leading breeding area for twisters. The greatest frequency of tornadoes in Illinois occurs in a wide band from Madison and St. Clair counties northeastward to Lake and Cook counties.³⁹ Illinois ranks fourth in the United States for the

³⁹ State of Illinois Natural Hazard Mitigation Plan

most tornadoes per square mile. The majority of Illinois tornadoes have occurred between April 1 and June 30 and between the hours of 3 p.m. and 10 p.m. However, tornadoes have occurred every month of the year at all hours of the day. On average, 53 tornadoes occur each year in Illinois. There were 63 tornadoes reported in Illinois during 2020, which resulted in 2 injuries and nearly \$2 million in property damage.⁴⁰ Most tornado damage paths are less than 100 yards wide and a couple of miles long but can be up to a mile wide and 50 miles long, resulting in the potential for severe damages.⁴¹



This chart shows the number of tornado-related fatalities by month for Illinois. April is the deadliest month with 97 reported deaths, mostly due to the 58 deaths associated with the 1967 Oak Lawn tornado outbreak. The second deadliest month was August, mostly due to the 29 deaths associated with the August 28, 1990, Plainfield event.

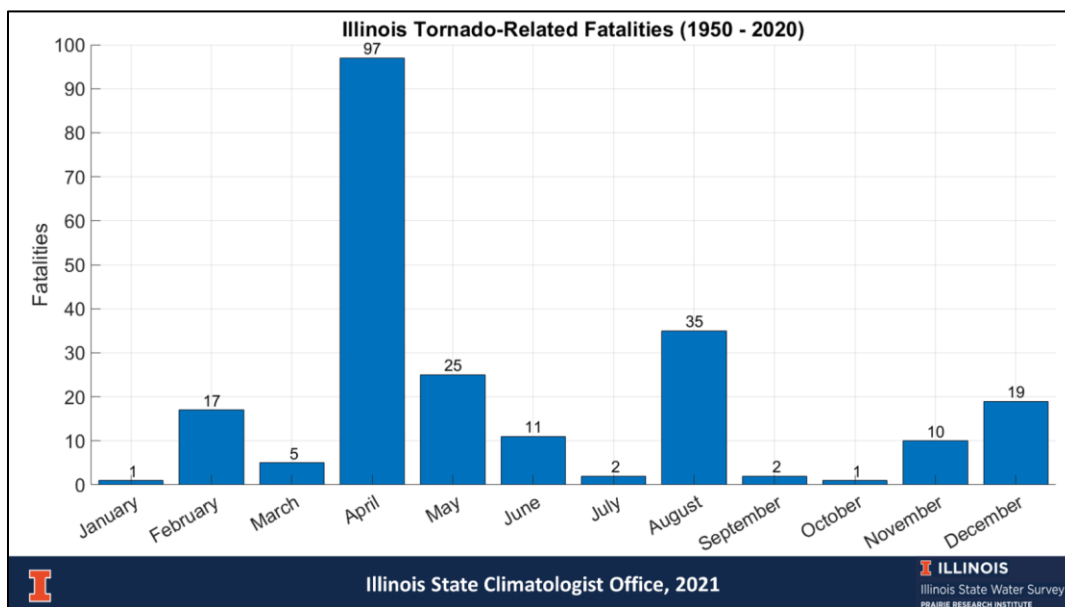
Importantly, December and February are the 4th and 5th deadliest months in Illinois despite have the 4th and 5th fewest tornadoes, respectively.⁴²

⁴⁰ State of Illinois Emergency Management Agency Severe Weather Preparedness Guide (<https://iemaohs.illinois.gov/content/dam/soi/en/web/iema/preparedness/documents/severeweatherpreparedness.pdf>)

⁴¹ Illinois Water Survey (https://www.isws.illinois.edu/statecli/tornado/04_svrprep_info.pdf)

⁴² Illinois State Climatologist (<https://stateclimatologist.web.illinois.edu/climate-of-illinois/tornadoes-in-illinois/>)

Figure 12: Illinois Tornado-Related Fatalities



According to the National Oceanic and Atmospheric Administration, there is no known way to predict whether or how climate change is affecting tornado frequency or severity. Some studies predict that climate change could produce more severe thunderstorms known as super cells. As global temperatures rise, the hotter atmosphere can hold more moisture. This increases atmospheric instability, an ingredient to supercell formation. On the other hand, as the planet warms, wind shear (another vital ingredient) is likely to decrease. These two forces work against each other, and it is difficult to anticipate which might have a greater impact on tornado formation. Furthermore, more frequent, or severe thunderstorms do not necessarily mean that more tornadoes will occur, especially since only about 20 percent of supercell thunderstorms produce tornadoes.

There is also evidence to suggest that climate change has shifted tornado patterns geographically east due to its impact on the jet stream. The number of tornadoes in the states that make up Tornado Alley are falling, while tornado events have been on the rise in the states of Mississippi, Alabama, Arkansas, Missouri, Illinois, Indiana, Tennessee, and Kentucky.

The fourth National Climate Assessment summarizes the complicated relationship between tornadoes and climate change: “Some types of extreme weather (e.g., Rainfall and extreme heat) can be directly attributed to global warming. Other types of extreme weather, such as Tornadoes, are also exhibiting changes which may be linked to climate change, but scientific understanding isn’t detailed enough to project direction and magnitude of future change.”⁴³

⁴³ Fourth National Climate Assessment, Volume II: Impacts, Risks, and Adaptation in the United States: <https://nca2018.globalchange.gov/>

Floods

A flood or flooding refers to the general or temporary conditions of partial or complete inundation of normally dry land areas from the overflow of inland or tidal water and surface water runoff from any source. Floodplains are defined as any land areas susceptible to being inundated by water from any flooding source.

A riverine flood is a temporary condition of partial or complete inundation of normally dry land areas from the overflow of stream banks. Flooding results when the flow of water is greater than the normal carrying capacity of the stream channel. Floods can be slow or fast-rising but generally develop over a period of days. Flooding is a natural and expected phenomenon that occurs annually, usually restricted to specific streams, rivers, or watershed areas.

Floods can damage or destroy property, make roads and bridges impassable, disable utilities, destroy agricultural lands, cause disruption to emergency services, and result in fatalities. People may be stranded in their homes, or they may be unable to reach their homes at all. Long-term collateral dangers include widespread animal death, the outbreak of disease, broken utility lines, fires, and the release of hazardous materials.

According to the Illinois Department of Natural Resources/Office of Water Resources (IDNR/OWR), Illinois has one of the largest inland systems of rivers, lakes and streams in the United States. Nearly 15% of our total land area (or 7,400 square miles) is subject to flooding. Floods are an inevitable natural event. Floods are by far the most common natural disaster in Illinois, accounting for well over 90% of the declared disasters. It is estimated that over 250,000 buildings are located in floodplains of Illinois. Since 1965 all but one county in Illinois had been declared at least once by the President as major disaster areas due to flooding. FEMA 4116-DR in 2013 resulted in the sole remaining county becoming declared. Three counties (Cass, St. Clair and Monroe) have been declared in each of the four years from 1993 to 1996. Ten counties were declared in both the 1993 and 1995 floods. Calhoun County, less than ten miles wide and approximately 42 miles from north to south and located between the Mississippi and Illinois rivers, and Cass County which has the Illinois River as its western boundary has had 17 major flood declarations between 1965 and 2017. A summary list of Federal Flood Declarations in Illinois from 1985-2017 can be found in the INHMP.

FEMA has identified and mapped areas of flood risk on Flood Insurance Rate Maps (FIRMs), with the highest risk zones, called the Special Flood Hazard Areas (SFHA). The 100-year floodplain is considered a high-risk area and is denoted as Zone A. The 500-year floodplain is shown by the notation Zone C or Zone X. The areas between the 100 and 500-year floodplains are shown using Zone B and Zone X.

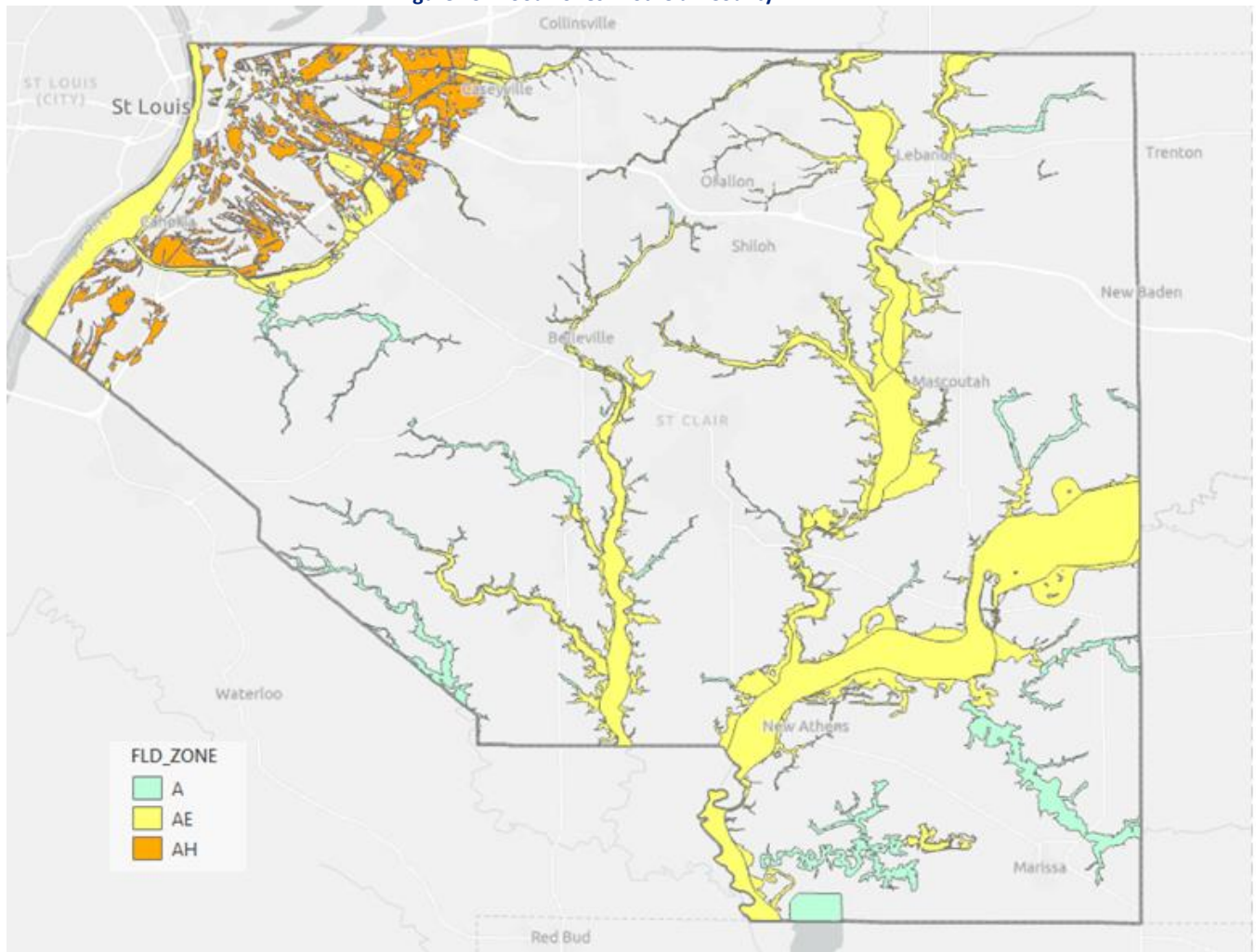
This information is shown in the Table below:

Table 29: FEMA-Designated Flood Zones

Zone	Description
Low to Moderate Risk Areas	
C and X (Unshaded)	Area of minimal flood hazard is usually depicted on FIRMs as above the 500-year flood level. Zone C may have ponding and local drainage problems that don't warrant a detailed study or designation as a base floodplain. Zone X is the area determined to be outside the 500-year flood and protected by a levee from the 100-year flood.
B and X (Unshaded)	Area of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods. B Zones are also used to designate base floodplains of lesser hazards, such as areas protected by levees from 100-year floods, or shallow flooding areas with average depths of less than one foot or drainage areas less than 1 square mile.
High-Risk Areas	
A	Areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 20-year mortgage. Because detailed analyses are not performed for such areas; no depths or base flood elevations are shown within these zones.
AE	The base floodplain where base flood elevations are provided.
AH	Areas with a 1% annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Base flood elevations derived from detailed analyses are shown at selected intervals within these zones.
AO	
High-Risk Coastal Areas	
V	Coastal areas with a 1% or greater chance of flooding and an additional hazard associated with storm waves. These areas have a 26% chance of flooding over the life of a 30-year mortgage. No base flood elevations are shown within these zones.
Undetermined Risk Areas	
D	Areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk.

Source : <https://msc.fema.gov/portal/home>

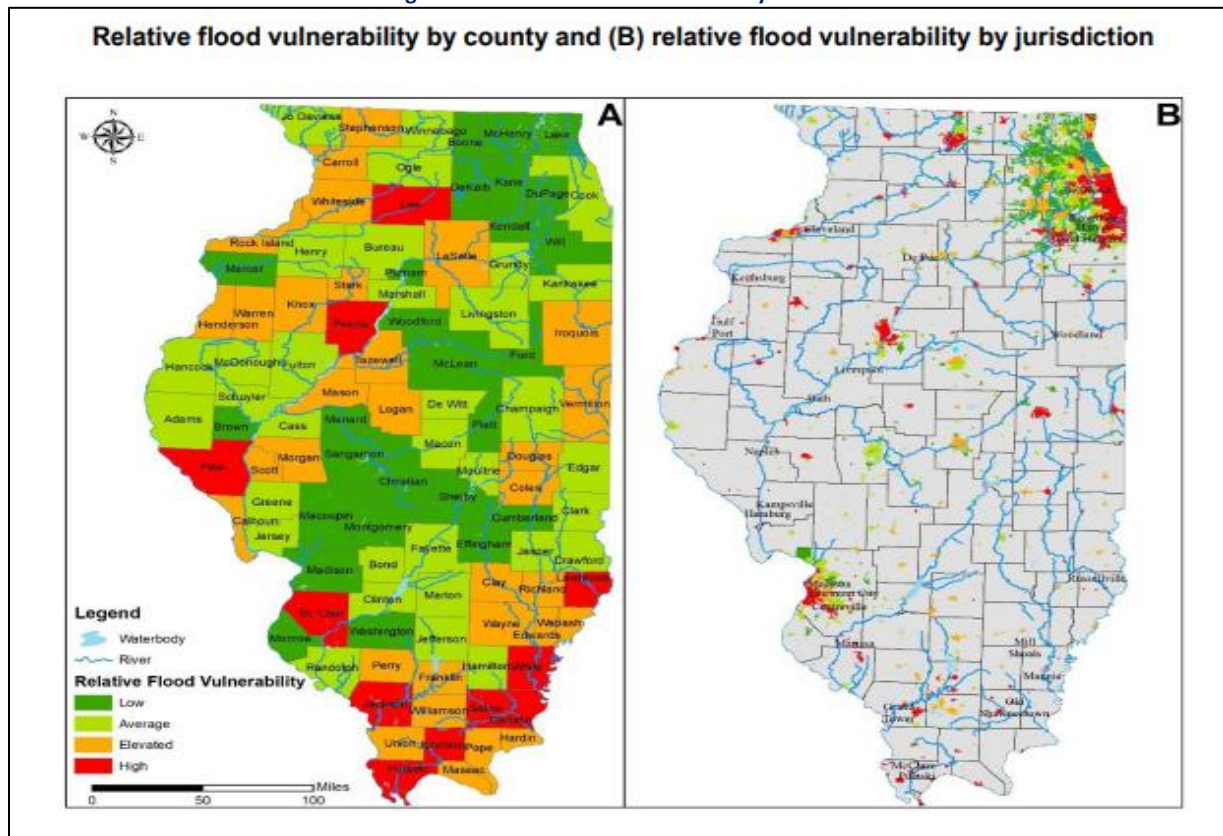
Figure 13: Flood Zones in St. Clair County



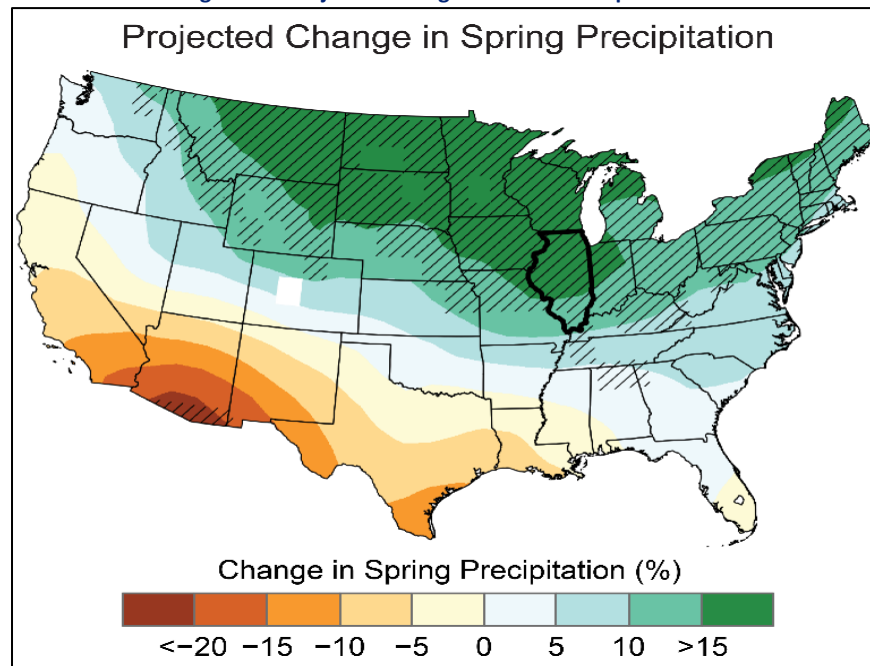
Source: FEMA preliminary data: <https://hazards.fema.gov/femaportal/prelimdownload/>

The following maps from the INHMP shows that St. Clair County is rated as having a high relative flood vulnerability.

Figure 14: Relative Flood Vulnerability in Illinois



Winter and spring precipitation and extreme precipitation events are projected to increase during the 21st century, and the hatching in the map below represents areas where the majority of climate models indicate a statistically significant change. Spring precipitation in Illinois is projected to increase in the range of 10% to greater than 15% by 2050 (see Figure 14 for precipitation map). The projections of increasing precipitation and heavy precipitation events are true for a large area of the Northern Hemisphere in the northern middle latitudes. This may result in inland flooding risks throughout the state.

Figure 15: Projected Change in Winter Precipitation⁴⁴

Drought

Numerous droughts have occurred in Illinois with the most significant occurring in the 1930s, 1950s, 1988, 2007, and in 2012. Following the Drought of 2007, the State Water Plan Task Force developed and published a report entitled “State of Illinois, Drought Preparedness and Response Plan” and includes recommendations for future preparations for drought. These recommendations have been partially implemented. In general, farmers are the first group to feel the impact of a drought. Besides causing stress to crops and livestock, many farmers rely on their own dug wells or wells drilled into shallow aquifers for their water supply. Both types of wells are very vulnerable to drought conditions. Public water supplies are typically more robust against drought but are not immune from long-term drought conditions. Public water supplies that rely on surface water supplies are historically more vulnerable to drought than those that rely on deep aquifers. The Illinois State Water Survey has produced a document dealing with drought and drought planning. The reference is *The Water Cycle and Water Budgets in Illinois: A Framework for Drought and Water-supply Planning* (Illinois State Water Survey).

Droughts are classified within four different categories—meteorological, hydrologic, agricultural, and socioeconomic. A meteorological drought is based on the departure of precipitation from an expected average or normal amount based on monthly, seasonal, or annual time scales. A hydrologic drought involves the effects of precipitation shortfalls on stream flows and reservoir, lake, and groundwater levels. An agricultural drought involves

⁴⁴ [Illinois - State Climate Summaries 2022 \(ncics.org\)](https://ncics.org/illinois-state-climate-summaries-2022)

deficiencies in soil moisture with respect to the water needs of plant life such as crops. A socioeconomic drought is when the effective demand for water exceeds the supply to the extent that costs begin to escalate, sometimes because of weather-related shortfalls.

Drought differs from other natural hazards in several ways. First, there is no exact beginning and end point that is obvious for a drought, whose effects may accumulate slowly and linger even after the event is generally thought of as being over. Second, the lack of clearly visible and universal standards to define a drought can make it difficult to confirm whether one exists, and its degree of severity. Third, drought impacts are often less obvious than other natural hazards, and they are typically spread over a large geographic area. Fourth, most communities do not have any contingency plans in place for addressing drought. This lack of pre-planning can hinder support for drought mitigation capabilities that would otherwise effectively increase awareness and reduce drought impacts.

Common effects of drought include crop failure, water supply shortages, wildlife mortality, and higher prices for water and agricultural goods. Substantial economic impacts can affect the agricultural and tourist sectors, which are very important for the county's economy. Droughts additionally threaten public health and safety by increasing the risk of illnesses and wildfires. Conflicts between water users can also arise, especially when a river or lake has competing uses among municipal, agricultural, industrial, and recreational users.

The Palmer Drought Severity Index (PDSI) is an attempt to compare weekly temperature and precipitation readings over a defined climatic region to identify periods of abnormally dry (or wet) weather. These PDSI readings reflect the relative disparity between moisture supply (precipitation and soil moisture) and demand (evapotranspiration, soil recharge and runoff needs) for a particular region based upon what is considered normal for the area. The index is used to evaluate scope, severity, and duration of abnormal weather.

Figure 16: Drought Severity in Illinois

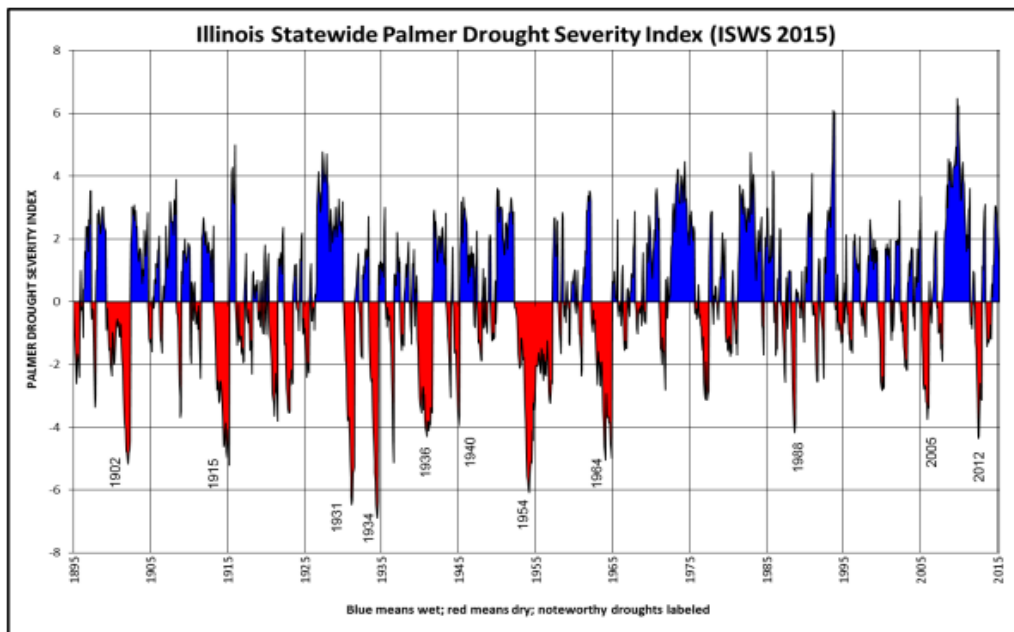


Figure: Time series of the state-wide monthly Palmer Drought Severity Index for Illinois from 1895 to 2015. Areas in blue represent wet periods while areas in red represent dry periods.

Since the effect of climate change on Illinois has involved an overall increase in precipitation, the severity of Illinois' droughts has generally been decreasing over the past half-century. Studies of climate have suggested that a gradual warming pattern has led to an increase in precipitation, since warmer air can carry more humidity. However, shorter duration seasonal droughts are expected to worsen during the warmer half of the year, even though the overall annual averages have been showing increases in precipitation. Therefore, there will still be drought events and dryer seasonal phases, especially in areas that are more susceptible locally.

Extreme Heat

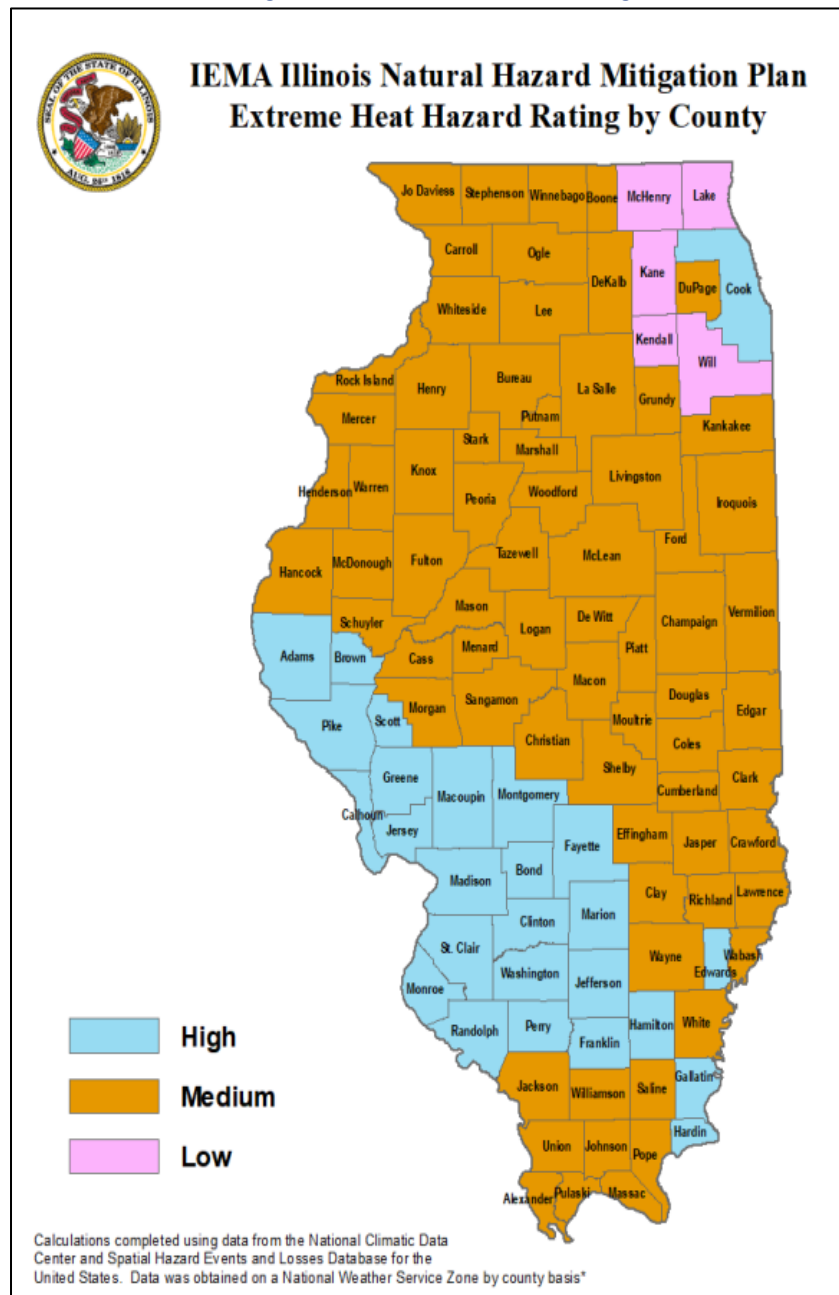
Extreme heat is defined as two to three days of heat and humidity with successive 90+ degree days. In July 1995, a heat wave contributed to more than 700 deaths in the Chicago area.

Illinois State Climatologists believe that typically over 300 people die from heat every year. Heat is responsible for the highest number of deaths every year from weather-related hazards in Illinois.⁴⁵

On the following IEMA INHP Extreme Heat Hazard rating by County map, St. Clair County is given a high ranking.

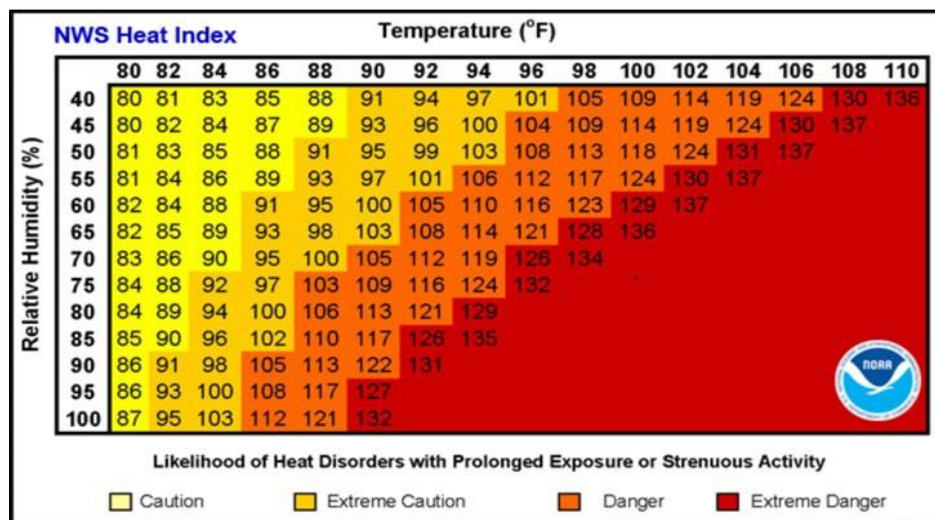
⁴⁵ State of Illinois Press Release (<https://www.illinois.gov/news/press-release.26689.html>)

Figure 17: Extreme Heat Hazard Rating



The heat index is a number in degrees Fahrenheit that tells how hot it feels when relative humidity is factored into actual air temperature. Exposure to full sunshine can increase the heat index by at least 15 degrees. Figure 17 shows the heat index values when both humidity and temperature are considered. It also shows the likelihood of heat disorders with prolonged exposure to or strenuous activity in such conditions.

Figure 18: NWS Heat Index



Under extreme heat conditions, the National Weather Service can issue either a heat advisory or an excessive heat warning. A heat advisory is issued when a heat index of 100 degrees Fahrenheit or higher is expected for three hours or more. An excessive heat warning is used when a heat index of 105 degrees Fahrenheit or higher is expected for three hours or more.

Extreme heat can impose stress on humans and animals. Exposure to heat can lead to a variety of adverse health impacts, ranging from cramps to death. Heat exhaustion is a relatively common reaction to excessive heat and can include symptoms such as headaches, dizziness, and fainting. If exposure is prolonged, heatstroke can occur. This reaction is more severe and requires medical attention. Deaths from heat exposure typically occur in individuals with pre-existing conditions, frequently those with heart conditions.

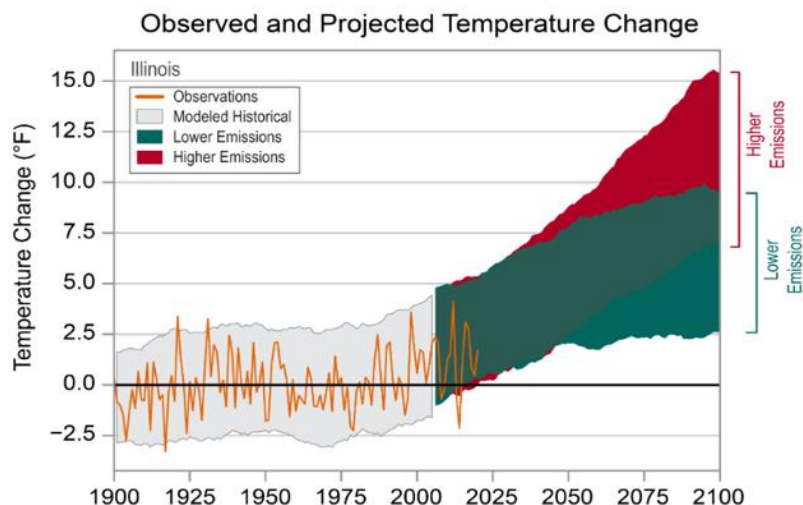
Certain demographic groups are particularly vulnerable to adverse health impacts from extreme heat events. Very young children, seniors, and populations with physical and psychiatric medical conditions are more vulnerable to health impacts from heat events than the general population. Additionally, people of color and low-income residents are at greater risk from adverse extreme heat health impacts.

Urban areas are also particularly at risk because of air stagnation and large quantities of heat-absorbing materials such as streets and buildings. Extreme heat can also result in distortion and failure of structures and surfaces such as roadways and railroad tracks.

Annual average temperatures in Illinois have risen about 1.5° F since the early 20th century and are predicted to increase in the coming decades. A higher emissions pathway could lead to unprecedented warming in the 21st century (see Figure 18). Historically unprecedented warming is projected during this century. Less warming is expected under a lower emissions future (the coldest end-of-century projections being about 2°F warmer than the historical

average; green shading) and more warming under a higher emissions future (the hottest end-of-century projections being about 11°F warmer than the hottest year in the historical record; red shading).

Figure 19: Predicted Temperature Change in Illinois Under Different Emissions Scenarios ⁴⁶



Severe winter storms

Severe winter storms are typically categorized by ice, sleet, and/or snowstorms. Winter storms usually occur when cold arctic air from Canada meets warmer, moist air from the Gulf of Mexico, producing heavy snow and sometimes blizzard conditions. Severe winter storms can be characterized by heavy and/or snow blowing snow, freezing rain, sleet, and extreme cold. Winter storms usually occur between October and April and can cause considerable damage, with heavy snow immobilizing transportation systems, downing trees and power lines, collapsing buildings, and resulting in crop and livestock losses.

As a result of proximity to the Great Lakes, Illinois experiences large differences in snowfall in relatively short distances. Average annual snowfall ranges from 37 inches of snow in Rockford and Chicago, to as little as 6 to 10 inches at the southern tip of Illinois.⁴⁷

Blizzards are winter storms lasting at least three hours with sustained wind speeds exceeding 35 mph, visibility of ¼ mile or less, and white-out conditions. When heavy snow or freezing rain accumulates in excess of six inches in a 12-hour period or ¼ inch, it can disrupt the flow of vital supplies as well as disrupt emergency and medical services. Severe ice storms can also result in electric power loss to large areas of the county, impede emergency assistance, and leave motorists stranded.

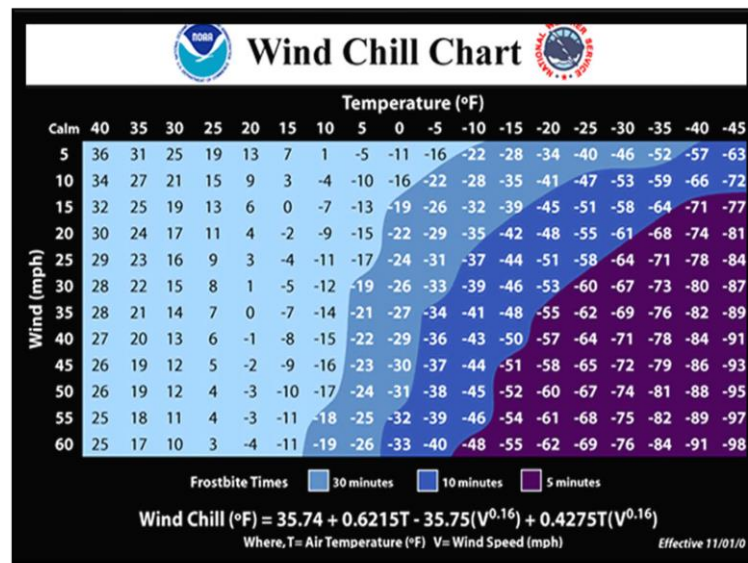
The frigid temperatures and wind chills associated with severe winter storms are also

⁴⁶ Illinois - State Climate Summaries 2022 (ncics.org)

⁴⁷ State of Illinois Emergency Management Agency Winter Weather preparedness guide (<https://iemaohs.illinois.gov/content/dam/soi/en/web/iema/preparedness/documents/winter-storm-preparedness-guidebook.pdf>)

dangerous to people, particularly children and the elderly, sometimes resulting in hypothermia, frostbite, and in rare cases, death. Such temperatures can also freeze pipes and kill livestock, fish, wildlife, and pets. The figure below illustrates frostbite potential relative to the duration of bare skin exposure. The coldest temperature on record in the State of Illinois occurred on January 31, 2019, when the mercury dipped to minus 38 degrees near Mt. Carroll in Carroll County.⁴⁸

Figure 20: NOAA Wind Chill Chart



On Average, Illinois experiences five severe winter storms each year. From November 2020 through April 2021 there were eight (8) snow or ice storms that impacted Illinois. There has not been a winter in Illinois without at least one winter storm in the past century. Winter driving conditions contribute to an average of nearly 29,000 vehicle crashes, more than 4,500 injuries and 80 fatalities in Illinois each year.

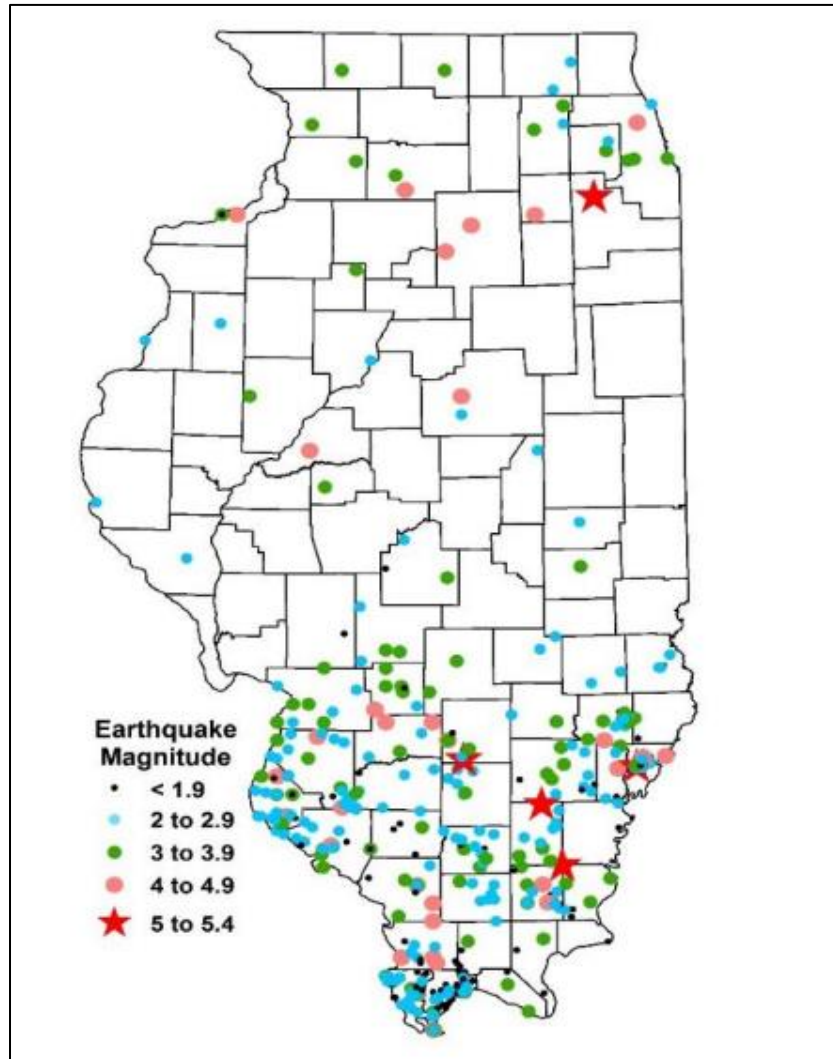
Earthquakes

Over 600 earthquakes have been reported or recorded in Illinois since 1795 through 2017. Four hundred and six have been estimated or recorded at magnitude 2 and greater; with magnitudes in the 2s being the level at which people start to feel earthquakes. Of these, 43 were magnitude 4 and higher, which is at the level to possibly cause some damage. Figure 20 shows the locations of earthquakes within the state and Table 30 lists magnitude 2 and greater earthquakes by county. Earthquakes occur when rocks forming the Earth's crust slip past each other along a fault. This slippage occurs when the buildup of stresses reach the point that they are greater than the strength of the locked up section of rocks along the fault plane. When faulting takes place, the sudden release of energy produces vibrations or seismic (shock) waves that radiate from the main fault movements. These waves cause the

⁴⁸ Ibid.

shaking or “quaking” that lasts tens of seconds to a few minutes, depending on the magnitude (energy released) of the event and what kinds of rocks the waves travel through and the stiffness or lack of stiffness of the soils at a site. Where the faulting starts, at some depth below the Earth’s surface, is the hypocenter (focus) of an earthquake. The point on the surface directly above the hypocenter is the epicenter. Of the 605 earthquakes shown in Figure 20, 90% occur in the southern third of the state, south of latitude 39° N, which includes St. Clair County.

Figure 21: Earthquakes in Illinois from 1795 through 2017



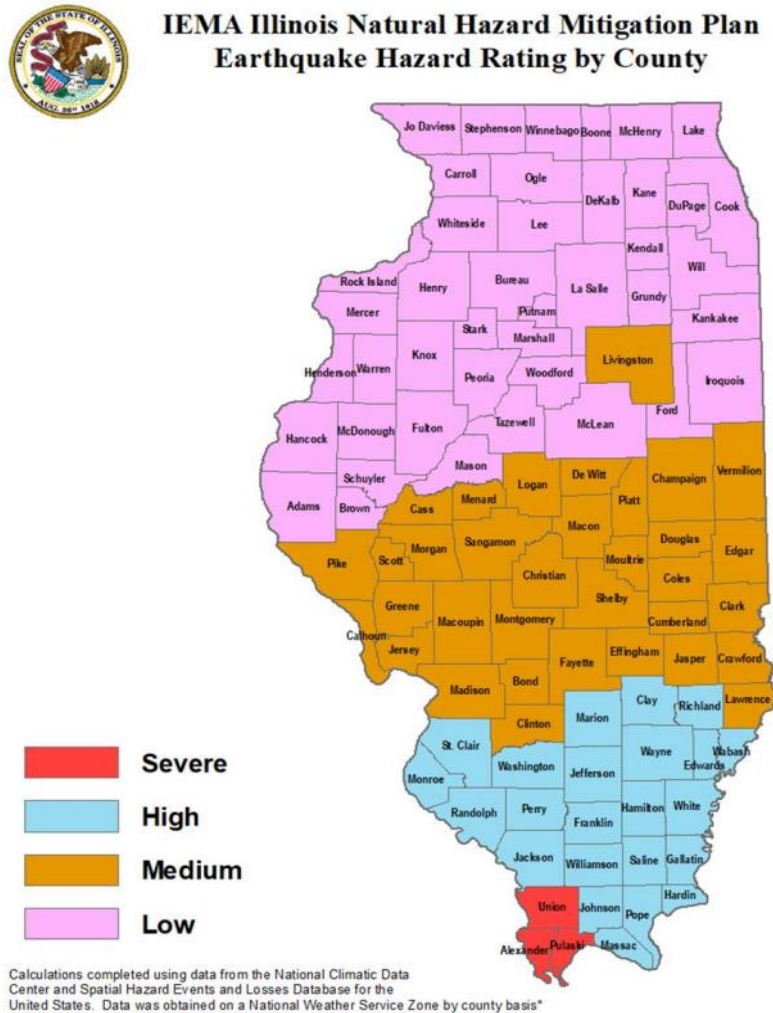
Although there have been over 600 earthquakes in Illinois reported during the last two+ centuries, very few of them have caused any damage (Modified Mercalli Intensity of VI or higher) or injuries. Larger earthquakes in the New Madrid region have caused more damage in Illinois than earthquakes originating in Illinois. The risk of probable damage from future earthquakes can be estimated based on the historical record of past earthquakes.

Table 30: Magnitude 2 and greater earthquakes by county from 1795 through 2017 (excluding aftershocks & swarms)

COUNTY	FELT		SOME POSSIBLE DAMAGE		COUNTY	FELT		SOME POSSIBLE DAMAGE	
	Magnitudes		Magnitudes			Magnitudes		Magnitudes	
	2 to 2.9	3 to 3.9	4 to 4.9	5 to 5.4		2 to 2.9	3 to 3.9	4 to 4.9	5 to 5.4
Adams	1				Marion	1	5	1	1
Alexander	30	21	5		Mason			1	
Bond	2	6	1		Massac	1	2		
Carroll		1			McHenry	2			
Christian	1	1			McLean	1		1	
Clay	1	1			Menard		1		
Clinton	2	1	2		Monroe	11	6	2	
Coles		1			Montgomery	2	2		
Cook	1	3	1		Peoria	1			
Crawford	3				Perry	2	2		
Douglas	1				Piatt	1			
Du Page	2	1			Pike	1			
Edwards	2	1	1		Pope		1	1	
Effingham	2				Pulaski	35	5		
Fayette		3			Randolph	10	5	1	
Franklin	7	3			Richland	19	5	2	
Fulton		1			Rock Island		1	1	
Gallatin	1	3			Saline	6	5	2	
Hamilton	6	5		2	St. Clair	18	7	2	
Henderson	1				Stark		1		
Jackson	2	3	2		Stephenson		1		
Jasper	2				Union	4		4	
Jefferson	5	1			Wabash	16	6	4	1
Johnson	1	1			Warren	1			
Kane	1	2			Washington	6	1		
Kendall			1		Wayne	7	5		
LaSalle			2		White	2			
Lawrence		1			Whiteside		2		
Lee		1	1		Will				1
Macoupin		1			Williamson	7	1		
Madison	5	4			Winnebago		1		

On the following IEMA INHP Earthquake Hazard rating by County map, St. Clair County is given a high ranking.

Figure 22: Earthquake Hazard Rating

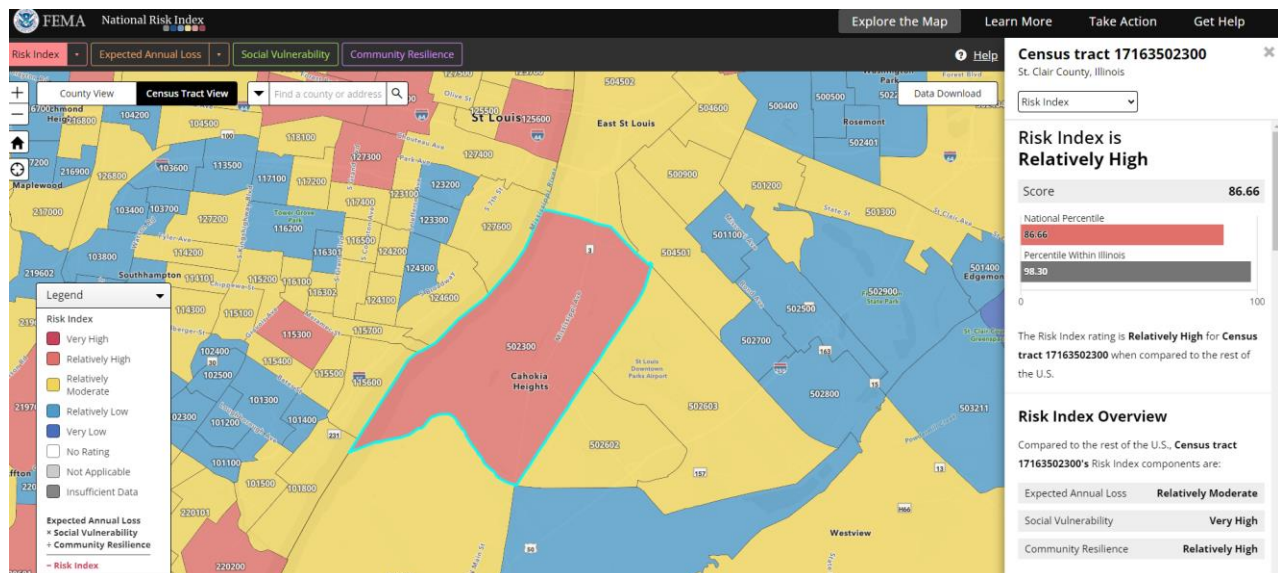


Summary

Overall, St. Clair County has a relatively moderate natural hazard risk per the FEMA National Risk Index, the same as neighboring counties St. Louis City and Madison. While the counties *Expected Annual Loss* and *Social Vulnerability* are relatively moderate, the *Community Resilience* is scored as relatively high.

While the county scored *very high* risk for ice storms (96.3), and *relatively high* for natural disasters such as cold wave, hail, heat wave, tornado, and winter weather it scored as only relatively moderate for riverine flooding (91.4). This relatively moderate risk estimates an expected annual loss to the County of \$3.6M with a frequency of 1.8 events per year (<https://hazards.fema.gov/nri/map>).

The FEMA National Risk Index provides a comprehensive risk index assessment by Census Tract, and selecting an individual Census Tract in the overview map shown above results in the following detail view:



Four census tracts stand out as more vulnerable than others:

Tract 5023 (East St. Louis, 62206) with *very high* social vulnerability marks as well as a *very high* risk score for hail and heat waves, and a *relatively high* score for ice storm, lightning, riverine flooding, tornado and winter weather.

Tract 5021 (East St. Louis, 62201) is scored as relatively moderate annual loss, but relatively high social vulnerability and community resilience. This area ranks *very high* in regard to hail, and *relatively high* for earthquake, heat wave, ice storm, tornado, and winter weather, but notably *relatively moderate* for riverine flooding.

Tract 5034 (largely O'Fallon, 62269) has *relatively high* community resilience, but also relatively high expected annual loss, while having only *relatively moderate* social vulnerability. This area is at *very high* risk for hail, heat wave, and *relatively high* risk for earthquake, ice storm, lightning, tornado, and winter weather. Notably this area has a relatively low risk of riverine flooding.

Lastly tract 5039 (62221, Belleville) which is located adjacent to Scott AFB and just south of Shiloh. Expected annual losses in this area are *very high*, while the social vulnerability is *relatively moderate*, and the community resilience is *relatively high*. The risk for hail, heat wave, ice storm, tornado, and winter weather hazards are *very high*, while risk for earthquake, lightning, and riverine flooding is *relatively high*.

Indispensable Services

Indispensable services are those that enable the continuous operation of critical business and government functions and/or are critical to human health and safety and economic security. In its local HMP, St. Clair County identifies the critical services listed below:

Table 31: Indispensable Services

Facility	Number of Facilities
Emergency Operations Centers	9
Fire Stations	65
Police Stations	38
Medical Care	9
Schools	153

3

General Requirements

General Requirements

Citizen Participation

Outreach and Engagement

In the development of this Action Plan, St. Clair County consulted with disaster-affected residents, stakeholders, local governments, public housing authorities, State agencies, and other affected parties in the surrounding geographic area. In doing so, St. Clair County ensured that the Action Plan was consistent with the disaster impacts, comprehensive, inclusive, and reflective of input.

To further understand the impacts of the disaster, St. Clair County conducted outreach to impacted local governments and organizations working on recovery efforts in the most impacted areas of the County. The following provides a summary of the impacts as described by local officials, collected starting the week of the flooding event in 2022. The images of the damages were taken from the IEMA PowerPoint on the July 26, 2022 Flooding Event in St. Clair County.

St. Clair County Overall

- St. Clair County declared a county-level disaster.
- The County has two shelters for the unhoused population (Holy Angels & St. Vincent DePaul) that received evacuees.
- 94 water rescues were performed, most on 7/26/22.

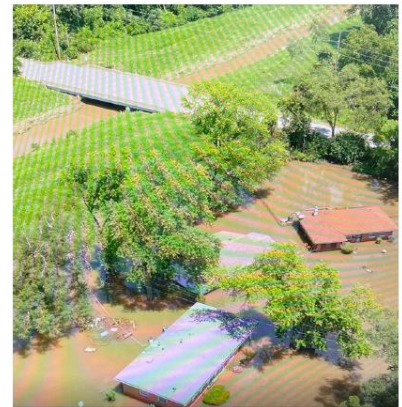


East St. Louis

- East St. Louis declared a local disaster.
- Terrace Drive area evacuated, 50+ homes and approx. 100 people asked to voluntarily evacuate. Door to door assistance was offered in this area.
- Thirty-five (35) houses were found to be substantially damaged per NFIP terms

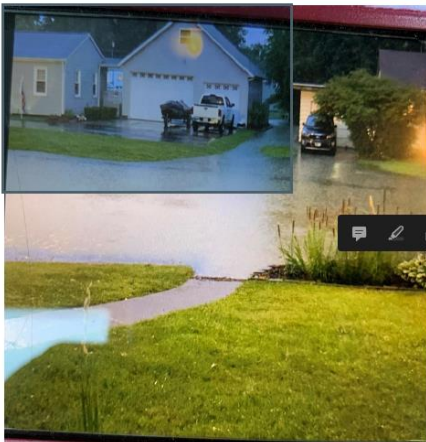
and will need to be elevated, moved, or demolished.

- Raw sewage back up into flood ravaged homes.
- The City worked with partner agencies to pay for extended stay hotels for elderly individuals who gathered at City Hall.



Belleville

- Police Department was inaccessible for 12 hours due to flooding.



Caseyville

- 150 Evacuees including 85 nursing home residents and 41 rehab center residents. They wanted to move patients to one of two Cahokia facilities but those were under danger of levee breach.
- COVID patients had to be separated from others.
- Pumps requested and installed to bring down water levels.
- Animal Shelter evacuated and 50+ animals fostered.



Cahokia

- Concern about flooding in two LTC facilities. Coordination between Illinois Dept. of Public Health and Emergency Management on levee conditions.

Public Hearings

Per the Federal Register's approach for CDBG-DR grantees with allocations under \$500 million, at least one public hearing is required during the 30-day comment period.

This CDBG-DR Action Plan is the product of multiple public hearings and consultation with agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly people, people with disabilities and homeless people.

The following Public Hearing was held to hear from citizens to determine the needs to be addressed by the CDBG-DR Action Plan at the date, time and location listed below:

- Thursday, October 26, 2023, 10:00 AM at St. Clair County's Annex Building

An additional public hearing for citizen review and comment on the proposed CDBG-DR Action Plan was held on the following date and time at the locations listed:

- November 2, 2023, 2:00 PM at St. Clair County's Annex Building

A draft of the plan was made available for public review and comment for a 30-day period beginning November 2, 2023, and ending December 2, 2023. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the County's website at **www.co-st-clair.il.us/departments/grants/development/Pages/default.aspx** and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624), various public libraries, senior/community centers, and village/city halls throughout the County. It is also made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

Complaints

St. Clair County is committed to affirmatively furthering fair housing and complies with The Fair Housing Act that prohibits discrimination because of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with limited English proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services.

In addition, when St. Clair County passes funds through to subrecipients and/or local governments the same affirmatively furthering fair housing actions and compliance with The Fair Housing Act are attached to the funds being distributed. Efforts will be made to remove barriers to fair housing as programs are implemented and compliance with The Fair Housing Act will be monitored. St. Clair County will evaluate whether subrecipients have (1) designated a fair housing and equal opportunity coordinator to be the prime liaison with DLG, (2) passed a fair housing resolution prior to release of grant funds, and (3) conducted one or more AFFH activities. Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Direct fair housing complaints can be made by calling HUD's Office of Fair Housing and Equal Opportunity (FHEO) Region 5 office at 1 (800) 765-9372 or emailing them at complaintsoffice05@hud.gov, or on hud.gov. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). St. Clair County will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on <https://www.co-st-clair.il.us/departments/intergovernmental-grants/community-development> to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

St. Clair County or its subrecipients shall provide a written response to each formal complaint within 15 working days of receipt of the complaint or will document why additional time for a response is needed.

- Formal complaints are written statements of grievance, including email, comments posted on the St. Clair County CDBG-DR website, and handwritten complaints. St. Clair County shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the St. Clair County CDBG-DR website. OHCS shall maintain a tracker for collecting and categorizing complaints through resolution.
- Informal complaints are verbal complaints. St. Clair County and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process described above.

Appeals

St. Clair County or its subrecipients shall include written appeals processes within each set of program guidelines. The appeals processes will include, but are not limited to the following:

- The process for submitting, tracking, and resolving a written appeal to the organization administering the program (St. Clair County or its subrecipient), to include whether an appeals committee will be established to review and/or rule on appeals.
- The documentation required when submitting an appeal.
- The timelines for reviewing and providing a response to the appeal.
- Clarification of what may or may not be appealed. Generally, policies that have been approved and adopted within program guidelines may not be appealed. St. Clair County and its subrecipients do not have the authority to grant an appeal to a regulatory or statutory or HUD-specified CDBG-DR requirement.

Public Website

St. Clair County will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through <https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development>

Specifically, St. Clair County will make the following items available:

- The action plan created using DRGR (including all amendments);
- Each performance report (as created using the DRGR system);
- Citizen participation plan;
- Procurement policies and procedures;
- All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and
- A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, will not be posted on the website.

In addition, St. Clair County will maintain a comprehensive website regarding all disaster

recovery activities assisted with these funds.

The website will be available to the public and accessible to persons with disabilities and those with limited English proficiency. St. Clair County will take reasonable measures to ensure meaningful access to programs and activities for all individuals, including LEP persons, members of protected classes, vulnerable populations, and individuals from underserved communities.

Reports and program information will be monitored frequently to ensure current information is displayed. At minimum, the website will be reviewed and updated quarterly. Changes to the website may only be authorized by designated personnel. The designated personnel will be responsible for testing the website to ensure all uploads are working properly and that the data is displayed correctly.

Amendments

Over time, recovery needs will change. Thus, St. Clair County will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities developed over time: an amendment may not be triggered if the program or activity is consistent with the plan.

When there are changes to the sections of this action plan that rise to the level of requiring an amendment, the County will do the following:

- Ensure the current version of the Action Plan is accessible for viewing as a single document, with all amendments;
- Identify the amendments by highlighting added or changed content;
- Include tables that clearly illustrate where funds are being moved;
- Include a revised budget table that reflects all funds applicable to the amendment.

Substantial Amendment

Substantial amendments to the CDBG-DR action plan for both will require at least 30-days of public notice. St. Clair County has defined Substantial Amendments to the Action Plan as those proposed changes that require the following decisions:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed reduction in the overall benefit requirement
- A reallocation which constitutes a change of 25 percent or greater of a program budget

Those amendments which meet the definition of a Substantial Amendment are subject to public notification and public comment procedures. Citizens and units of local government will be provided with reasonable notice and an opportunity to comment on proposed

Substantial Amendments to the Action Plan. A notice and copy of the proposed Substantial Amendment will be posted on the County's official website in adherence with the Americans with Disabilities Act and LEP requirements. St. Clair County will identify and consider potential barriers that limit or prohibit equitable participation and will undertake reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach and engagement with underserved communities and individuals, including persons with disabilities and those with limited English proficiencies. Copies will be provided upon request at St. Clair County, if otherwise not accessible for review by any residents.

Citizens will be provided with no less than thirty (30) days to review and comment on the proposed substantial amendment. Written comments may be submitted to:

Christina Anderson
St. Clair County Intergovernmental Grants Department
19 Public Square, Suite 200
Belleville, IL 62220-1624
Christina.Anderson@co.st-clair.il.us
618-825-3218

A summary of all comments received responses will be included in the Substantial Amendment that is submitted to HUD for approval and posted to the St. Clair County's official website.

Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments, and thus do not need public comment. St. Clair County will notify HUD five (5) business days before the change is effective.

All amendments (substantial and non-substantial) will be numbered sequentially and posted to the website into one final, consolidated plan.

CDBG-DR Policies and Procedures Manual

St. Clair County has implemented a CDBG-DR Policies and Procedures Manual to provide

guidance for the St. Clair County Intergovernmental Grants Department that will assist in carrying out its financial and programmatic responsibilities under Community Development Block Grant Disaster Recovery Grants (CDBG-DR). The manual is attached as an appendix to this plan and ensures that the detailed administrative requirements of the Office of Management and Budget 29 CFR Part 97, Uniform Administrative Requirements for Grants and Agreements, 2 CFR Part 200 (as applicable), and 24 CFR Part 570 are adhered to.

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Grantee Proposed Use of Funds

Grantee Proposed Use of Funds

Overview

St. Clair County is the lead agency and responsible entity for administering \$30,027,000 in CDBG-DR funds allocated for disaster recovery. St. Clair County will use a competitive process for all programs to invest funds in projects that best meet the goals of this Action Plan and are in alignment with HUD's overall intent of recovery for local communities. St. Clair County intends to implement and carry out a program for infrastructure and public facilities.

Program Details

Program Budget –Disaster Recovery

Table 32: Program Budget

Program Category	Program	Budget	HUD identified MID Budget	% of Allocation	Max. Award	National Objective	Estimated Outcome
1	Infrastructure and Public Facilities	\$28,525,650	\$28,525,650	95%	\$10,000,000	LMA	5
2	Administration	\$1,501,350	\$1,501,350	5%		N/A	N/A
Total		\$30,027,000	\$30,027,000	100%			

1.2.1.1 Expenditure and Compliance Requirements

Program Administration Costs: Limited to 5%—or \$1,501,350—of the total allocation.

Planning Costs: Limited to 15%—or \$4,504,050—of the total allocation. No funds are proposed in this plan for planning activities.

Mitigation Activities: At least 15%—or \$3,917,000—must be used for mitigation activities and/or the incorporation of mitigation measures into recovery activities. The County plans on incorporating resilience and mitigation measures into all construction programs. The County will define mitigation activities and establish mitigation measures within each program.

HUD-Identified Most Impacted and Distressed (MID) Areas: 100% of the total allocation must benefit the HUD-identified areas.

Benefits for Low- to Moderate-Income (LMI) Persons: At least 70%—or \$18,917,010—of the allocation (less planning and administration costs) must be used for activities that benefit LMI persons.

Connection to Unmet Needs

CDBG-DR applicable notice, FR-6393-N-01, require a grantee to allocate 100% of the funds to address unmet needs in the HUD- identified “most impacted and distressed” (MID) areas of St. Clair County.

In considering the unmet, mitigation and local needs, and the limited amount of CDBG-DR funds, this Action Plan proposes to use the funds to address the needs of infrastructure and public facilities, mitigation and resiliency planning activities and incorporates mitigation activities into all programs. In consultation with local communities, it was clear to St. Clair County that with a limited amount of funds and in looking at how they can assist an entire community, infrastructure needs will be prioritized and receive a greater allocation which is reflected in the proposed programs below.

In consultation with affected municipalities about the best solution and given that the disaster was a flooding event which aligns with flooding being identified as a top priority in hazard mitigation plans, the County has made a conscious decision to fund infrastructure replacement and upgrades to provide the most benefit to the most persons with relatively small funding allocation. Specifically addressing unmet needs and resiliency relating to sewer and storm water drainage will be funded with the Community Development Block Grant Disaster Recovery funds.

St. Clair County acknowledges that many homeowners experienced extreme flooding in their basements and incurred damage to their furnaces, hot water heaters and personal belongings due to inadequate storm water systems. However, given the limited amount of funding made available, making improvements to the sanitary sewer systems, storm water systems and other housing infrastructure needs will support the housing recovery for this

area more effectively than repairing homes that will likely flood again without the infrastructure improvements.

Allocating CDBG-DR funds to fix the root of the problem makes sense in the long term from a cost benefit basis and from a mitigation basis as well for entire communities. Infrastructure projects can give homeowners a sense that the structural problems that currently exist will be remedied to mitigate future disastrous flooding and basement back-up incidents. To ensure infrastructure and public facilities projects have the resources needed, this plan proposes allocating \$28,525,650 to the program for projects in the HUD-identified MID.

Leveraging Funds

St. Clair County understands the importance of leveraging all available funds and resources to increase its ability to address and mitigate against major disasters. The County anticipates leveraging CDBG- DR funds with other funding sources such as FEMA and other State and local funds. CDBG-DR funds will be used to address critical unmet needs that remain after all other funding sources have been committed and exhausted to prevent any duplication of benefits.

Many non-profits, faith-based organizations, and other groups have resources (financial, volunteer, materials) available for residents in St. Clair County whose primary residences were impacted by the flood. Disaster case managers coordinate recovery including providing owner-occupied housing recovery assistance with local funds. By leveraging these funds that focus on individual assistance and not duplicating the assistance, St. Clair County able to focus on using the CDBG-DR funds that protect people and property as a community.

Program Partners

St. Clair County will partner with local governments, quasi-government entities and other agencies through subrecipient agreements or interagency agreements to carry out the programs and coordinate funding and activities to ensure that information, program updates, and data are shared when necessary and utilize methods to reach vulnerable populations, protected classes, persons experiencing homelessness, and those historically underserved.

Distribution of Funds

Each of the program descriptions below include information on how St. Clair County will distribute CDBG-DR funds and whether St. Clair County will carry out the activities directly or through subrecipients.

The proposed Infrastructure program description includes the following sections:

- Program Budget and Amount for LMI and HUD MIDs

- Program Description
- Program Tieback to Disaster/Unmet Needs
- Program National Objective(s)
- Program Eligibility
- Program Responsible Entity
- Program Maximum Assistance
- Program Estimated Begin and End Dates
- Other Program Details
- Program Competitive Application Overview (if applicable)
- Program Method of Distribution Description/Overview
- How Mitigation Set-Aside Activities will Meet the Definition of Mitigation
- How Mitigation Set-Aside Activities will Address Current and Future Risks
- How Program will Advance Long-Term Resilience (Infrastructure)
- How Program will Address Disaster-Related Storm Water Management/Other Systems (Infrastructure)

Program Income

St. Clair County understands that certain activities funded with CDBG-DR funds could result in the generation of program income. Program income is the gross income received by St. Clair County or any of its subrecipients that is directly generated from the use of CDBG-DR funds. Information regarding how program income may be generated and used is available at 24 C.F.R. §570.489 and 24 C.F.R. §570.504, as well as on HUD's website. St. Clair County allows for the following uses of program income:

- Program income is tracked and maintained by St. Clair County.
- Up to 5% of the program income generated by CDBG-DR funds may be used for administrative costs by St. Clair County, units of local government, or other subrecipients.
- Program Income shall be used or distributed before additional withdrawals from the U.S. Department of Treasury are made.
- St. Clair County shall treat program income as additional CDBG-DR funds subject to the requirements of the Consolidated Notice and shall use it in accordance with the approved CDBG-DR Action Plan.
- St. Clair County may transfer program income to its annual CDBG program before close-out of the grant.

Resale or Recapture

As per the Federal Register Notice (87 FR 6364), St. Clair County shall establish resale or recapture requirements for housing programs funded and shall outline those requirements in the program guidelines for the activity. The resale and recapture provisions must clearly describe the terms of the resale and recapture provisions, the specific circumstances under which these provisions will be used, and how the provisions will be enforced (whether by recorded deed restrictions, covenants, or other similar mechanisms). The affordability restrictions, including the affordability period requirements, do not apply to housing units newly constructed or reconstructed for an owner-occupant to replace the owner-occupant's home that was damaged by the disaster. Grantees must establish affordability restrictions on all newly constructed single-family housing (defined as four units or less), to be purchased and occupied by LMI homeowners. The minimum affordability period acceptable for compliance are the HOME requirements at 24 CFR 92.254(a)(4).

Resale or recapture is not applicable to the proposed programs below.

Program Details

Program Timeline

The estimated program launch date is Quarter 1 of 2024 and will end when all eligible participants have completed project closeout, all budgeted funds have been expended, or 6 years after execution of the grant agreement with HUD.

How Mitigation Set-Aside Activities will Meet Definition of Mitigation

All mitigation activities funded for infrastructure projects will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

How Mitigation and Resilience Measures will Address Current & Future Risks

Adding mitigation measures resilience to future natural disasters and reduce the long-term risk of loss of life, injury, damage to and loss of property, and lessen suffering and hardship and impact of future natural disasters.

Infrastructure and Public Facilities Program

Table 33: Infrastructure and Public Facilities Program

Program	Budget	HUD-Identified MID Budget
Infrastructure and Public Facilities Program	\$28,525,650	\$28,525,650

Program Description

This program will award funds to eligible projects within the identified HUD MID county to address unmet recovery and mitigation needs associated with general infrastructure and public facilities. The grant funds will allow recipients to design and construct infrastructure and public facilities that will directly benefit individuals and the larger community.

The program allows for a wide range of CDBG-DR eligible infrastructure activities and each activity must revitalize disaster impacted communities by directly or indirectly supporting the mitigation of loss of life or property in the face of current and future natural hazards.

The Infrastructure and Public Facilities program identifies infrastructure as including, but not limited to, the following types of projects: streets, water and sewer facilities, playgrounds, underground utilities, generator installation, and flood and drainage measures. The program defines public facilities as projects that improve hospitals, schools, libraries, police stations, fire stations, and buildings owned by non-profits that are open to the public. Funding and Program guidelines will further define eligible projects for applicants.

Program Tieback to Disaster

Projects funded through this program will be required to address remaining direct and indirect impacts in HUD-identified MID. Projects may also address risks from future potential disasters with integration of mitigation measures and strategies included in project activities.

How the Program Promotes Equity and Housing for Vulnerable Populations

The program focuses on projects that benefit the community as a whole and will protect life and property. The program includes public facilities that can serve as emergency centers during a disaster event. These types of projects help preserve the current housing inventory such as affordable housing for low-income households, including members of protected classes, HUD- identified vulnerable populations, and historically underserved communities.

How the Program will Advance Long-Term Resilience

Eligible projects include those that mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. Project applications will be required to demonstrate how the projects will be operated and maintained beyond the life of the CDBG-DR grant and how adaptable and reliable technologies are being used to prevent premature failure.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within St. Clair County's impacted communities. Project applications will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards.

Program National Objective

Assistance provided under this program will meet the national objectives of benefiting low- and moderate-income areas (LMA) or addressing an urgent need.

HUD waived the urgent need national objective criteria in section 104(b)(3) of the HCDA and established the following alternative requirement that for any CDBG-DR grantee using the urgent need national objective may use it for a period of 36 months after the applicability date of the grantee's Allocation Announcement Notice.

Program Eligibility

Table 34: Infrastructure and Public Facilities Program Eligible Activities

CDBG-DR Eligible Activity:	Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements; HCDA 105(a) 1, 2, 4, 9, 12; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 31636) and other applicable notices or guides.
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Geographic Eligibility

Eligible locations include jurisdictions within 2022 HUD-identified MID county: St. Clair County

Eligible Activities

Activities may include acquisition; construction or reconstruction; installation; infrastructure improvements for flood protection, drainage improvement, emergency power, evacuation routes and hazard mitigation; and public facility improvements for shelters, community centers, police and fire stations, and hospitals.

Ineligible activities

- Buildings for government use
- Purchase of construction equipment
- Maintenance and Operation

Program Responsible Entity

St. Clair County and Subrecipients

Program Eligible Applicants

Units of local governments, quasi-government entities and non-profit organizations

Program Maximum Assistance

The estimated minimum program assistance available is \$25,000 and the maximum assistance available is \$10,000,000. Adjustments may be made to the minimum and maximum amounts to ensure completion of projects and implementation of resiliency and mitigation measures.

Program Method of Distribution

St. Clair County will use competitive funding rounds to award funds to eligible projects being completed by eligible local governments and/or entities. The County will post the funding rounds and publish the awards on:

<https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development>

Program Application Overview

The application process will require applicants to demonstrate how their projects address unmet and/or mitigation needs and how funds will be used equitably in their communities.

Applications for funding may be evaluated on, but not limited to, the following project components:

- Amount of project detail provided and tieback to the disaster and community need
- Project schedule and timeliness of expenditures

- LMI percentage of a project's service area
- Cost reasonableness of the project
- Other funding leveraged for the project
- Project's impact on recovery or mitigation of future disasters
- Project's expanse of benefit that is demonstrated through number of residents and/or coverage area

Program Timeline

The program is expected to start Q1 of 2024 and end when all eligible participants have completed project closeout, all budgeted funds have been expended, or 6 years after execution of the grant agreement with HUD.

How Mitigation Set-Aside Activities Will Meet Definition of Mitigation

All mitigation activities funded for infrastructure and public facilities will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

How Mitigation and Resilience Measures will Address Current & Future Risks

The program is focusing on projects that will mitigate flood damage by improving sewer and water systems and projects that will make the communities more resilient through projects such as enhancements of public facilities and road improvement.

How Program will Address Disaster-Related Storm Water Management/Other Systems

The program includes eligible activities to address disaster-related storm water management and other systems for local communities to apply for.

Administration

Table 35: Budget

Program	Budget	HUD-Identified MID Budget
Administration	\$1,501,350	\$1,501,350

Program Description

Administration costs are necessary to support expenses related to administrative activities that include, but not limited to financial transactions, contract development, staff time administering programs; compliance and monitoring of the State's subrecipients, vendors, other recipients of funding; and other costs specified as eligible administrative expenses in 24 CFR 570.206. Up to 5% of the overall grant and any program income may be used for administration of the grant, inclusive of administrative costs incurred by MEDC.

Program Eligibility

Table 36: Administration Eligible Activities

CDBG-DR Eligible Activity:	Program administrative costs, defined at 24 CFR 570.205 and 570.206, and any applicable waivers or alternative requirements
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Appendices

Appendix

Summary and Response of Public Comments

Comments and responses shall be posted in the final Action Plan submitted to HUD.

No Public Comments were received.

Data Sources

Are marked throughout the document in the form of footnotes.

Important Definitions and Terms

- **AMI:** Area Median Income
- **CBD0:** Community Based Development Organization
- **CDBG:** Community Development Block Grant
- **CDBG-DR:** Community Development Block Grant- Disaster Recovery
- **CFR:** Code of Federal Regulations
- **CO:** Certifying Officer CP: Participation
- **DOB:** Duplication of Benefits
- **DRGR:** Disaster Recovery and Grant Reporting System
- **FEMA:** Federal Emergency Management Agency
- **HCD Act:** Housing and Community Development Act of 1974, as amended
- **HMGP:** Hazard Mitigation Grant Program
- **IA:** (FEMA) Individual Assistance
- **LIHTC:** Low-Income Housing Tax Credit
- **LMI:** Low and moderate-income
- **NFIP:** National Flood Insurance Program
- **PA:** (FEMA) Public Assistance
- **RE:** Responsible Entity
- **RFP:** Request for Proposals
- **SBA:** U.S. Small Business Administration
- **SFHA:** Special Flood Hazard Area
- **UGLG:** Unit of general local government
- **URA:** Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended
- **USACE:** U.S. Army Corps of Engineers

Public Notices

NOTICE OF PUBLIC MEETING FOR ST. CLAIR COUNTY'S CDBG-DR ANNUAL ACTION PLAN COMMUNITY NEEDS DETERMINATION

St. Clair County Intergovernmental Grants Department, Community Development Group is in the process of preparing its **Annual Action Plan** for CDBG-DR funds awarded to St. Clair County as a result of the July 2022 flooding. **We want you to tell us about your needs and needs within your community.**

The geographic area we serve includes all of St. Clair County, except Scott Air Force Base and the Cities of Collinsville, Mascoutah and Madison.

The CDBG-DR funding is designed to address the needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet needs in St. Clair County due to the flood disaster that occurred during July 25-28, 2022.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$30,027,000 in CDBG-DR funds to St. Clair County in response to the 2022 flood disaster (DR- 4547) through FR-6393-N-01 (Public Law 117-180) made on May 18, 2023. This allocation was made available through the Continuing Appropriations Act of 2023 for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most-impacted and distressed" (MID) areas resulting from a qualifying major disaster in 2021 or 2022. Additionally, the Department of Housing and Urban Development Appropriations Act, 2023 (Pub. L. 117-328, Division, L, Title II) approved December 29, 2022, makes available CDBG-DR funds for major disasters that occurred in 2022. These allocations from Public Laws 117-180 and 117-328, (collectively, the "Appropriations Acts" are for disasters occurring in 2022.

We would appreciate your input as we determine the needs of low and low-moderate income persons, set goals, and plan how to best meet these goals with the funds available. Help us to better serve you and your community.

St. Clair County will hold two public meetings on:

Date: Thursday, October 26 and Thursday November 2, 2023

Time: 10/26/2023 10:00 am and 11/2/2023 at 2:00 p.m.

Address: 19 Public Square, Suite 200, Belleville, IL 62221-Administration Conf. Room

All are welcome to attend the Public Meeting. Please contact us at: St. Clair County IGD, 19 Public Square, Suite 200, Belleville, IL 62220. Attn: Chris Anderson, or Christina.Anderson@co.st-clair.il.us, or 618-825-3218 for the following:

- If you need special accommodations to participate in this meeting or access the information to be presented (5 days in advance, please).
- If you need English translation assistance (5 days in advance, please).

The County will seek additional public input as the planning process continues for the CDBG-DR Action Plan.

MARK A. KERN
CHAIRMAN, ST. CLAIR COUNTY BOARD

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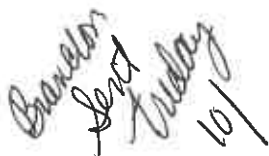

Chris Anderson, CD Program Coordinator

10/16/23
Date

Approved by:


Rick Stubblefield, IGD Executive Director

Date



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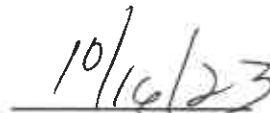
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Belleville, IL 62220-1624
(618) 825-3217

Requested by:


Chris Anderson, CD Program Coordinator

Date



Approved by:


Rick Stubblefield, IGD Executive Director

Date



St. Clair County CDBG-DR Policies & Procedures Manual



ST. CLAIR COUNTY, ILLINOIS

COMMUNITY DEVELOPMENT BLOCK GRANT

DISASTER RECOVERY

POLICIES & PROCEDURES MANUAL

FINANCIAL ADMINISTRATION AND MANAGEMENT

OF THE

HUD DISASTER RECOVERY COMMUNITY DEVELOPMENT BLOCK GRANT

SECTION 1: INTRODUCTION

This document is to provide guidance for the St. Clair County Intergovernmental Grants Department that will assist in carrying out its financial and programmatic responsibilities under Community Development Block Grant Disaster Recovery Grants (CDBG-DR).

The detailed administrative requirements of the Office of Management and Budget 29 CFR Part 95, Uniform Administrative Requirements for Grants and Agreements, 2 CFR Part 200 (as applicable), and 24 CFR Part 570 are adhered to.

SECTION 2: FINANCIAL MANAGEMENT SYSTEM

The following parts detail financial management systems that will be utilized to maximize compliance and efficiency. Please refer to St. Clair County Intergovernmental Grants Department Financial Policies and Procedures.

SECTION 3: DOCUMENT CONTROL, WEBSITE AND REPORTING

All documents used by staff will be standardized, properly documented, recorded, and auditable. Documents will be placed on the St. Clair County Intergovernmental Grants website under the CDBG-DR file. Records, applications, and support documents related to the grant shall be retained for the greater of seven years from close-out of DR grant award, final audit acceptance, or the period required by other applicable laws and regulations. Files will consist of source documentation, including contracts and sub grant awards and will be maintained in hard copy files. The County's MIP system will also retain all source documentation and accounting records for the same period.

A quarterly performance report will be submitted to HUD no later than 30 days following the end of each quarter after grant award and continuing until all funds have been expended and all accomplishments have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted, obligated, drawn down and expended; the funding source and total amount of any non-CDBG-DR funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes; status of quarterly spending estimates and completion targets for each project; and the race and ethnic status of persons assisted under direct-benefit activities. Quarterly reports to HUD will be submitted using the DRGR system and within 3 days the County will post the submitted report to its official website.

The County will maintain on its website critical information on project scope, budget and delivery status. The website, <https://www.co.st-clair.il.us/departments/intergovernmental-grants/communitydevelopment?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG DR>, will provide access to CDBG-DR plans, project reports the citizen participation plan, procurement policies and procedures, executed contracts paid with CDBG-funds and any request for proposals, a summary including the description and status of services

or goods currently being procured by the grantee or the subrecipient. All critical information will be updated at least quarterly. Action Plans, Amendments, Performance Reports including all activities as described in the CDBG-DR Action Plan, and Quarterly Reports will be available on this site. The County has the LEP posted on their website and will make documents required available in a form accessible to persons with disabilities or limited English proficiency, this includes protected classes, vulnerable populations and individuals from underserved communities upon request.

SECTION 4: OVERALL BENEFIT OF LOW/MOD INCOME PEOPLE

The overall benefit in the Federal Register Notice Vol. 88 No. 96 dated May 18, 2023 provides that 70% of total CDBG-DR funds awarded must benefit low- and moderate-income persons.

SECTION 5: PROGRAM ADMINISTRATION COSTS LIMITATION

In accordance with Federal Notice Vol. 88 No. 96 dated May 18, 2023, Public Law 117-328 no more than 5% of total CDBG-DR grant awards will be used for program administrative costs.

SECTION 6: PUBLIC SERVICE CAP

In accordance with 24 CFR 570.201 no more than 15% of the total amount of CDBG-DR funds will be utilized for Public Services.

SECTION 7: PREVENTING FRAUD, ABUSE OF FUNDS AND DUPLICATION BENEFITS

In order to ensure the proper disbursement of grant funds, the County plans to remain in compliance with applicable CDBG rules and regulations, as well as other applicable federal regulations such as Office of Management and Budget 2 CFR Part 200. The County will particularly emphasize mitigation of fraud, abuse and mismanagement related to accounting, procurement and accountability which may also be investigated. The County will monitor the compliance of applicants and HUD will monitor the County's Disaster Recovery Program.

As provided by the Stafford Act 42 U.S.C. 5121-5207 Section 312 duplication of benefits is prohibited. The Staff will continuously monitor, or cause to be monitored, for compliance with this requirement. FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies will be contacted, and data sharing agreements put into place to ensure that there is no duplication of benefits occurring within the various programs.

CDBG-DR funds will not be used for activities for which funds have been received (or will be received) from FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies. CDBG-DR funds may be used to provide assistance to the extent that a disaster recovery need has not been met by other sources. Applicants for assistance will be required to disclose all sources of assistance applied for, received or to be received on a Duplication of Benefits Form (see DOB policies and procedures). All applicants will sign an application and a contract verifying all sources and an agreement to pay back any or all

of the CDBG-DR assistance if additional funding is made available to them during the term of the contract or after the contract expires.

The County will be responsible for verifying the application information before an award is made or a contract is executed. The County will use data from FEMA, SBA, private insurance, etc., to verify Duplication of Benefits. Unique budget codes will be established for all projects and expenditures will be tracked using MIP software. Any findings of duplicated benefits will be reported by Staff to the Director and Finance who will immediately notify the County's Law department and HUD. Appropriate actions will be taken to reclaim benefits following a full review. The County will be executing agreements with recipients of CDBG-DR funds that will guide recapture of funds if a Duplication of Benefits is discovered after the disbursement of funds.

Steps to Avoid Mismanagement and Abuse of Funds

The County will assess all program policies and procedures from an anti-fraud, waste, and abuse perspective. The County provides anti-fraud training to program staff annually, CDBG-DR staff will attend fraud related training provided by HUD OIG when offered. Anyone with information regarding known or suspected misappropriation of funds or resources is encouraged to report the information to the County by sending a written report via U.S. mail to the following address: St. Clair County Intergovernmental Grants Department, 19 Public Square, Suite 200, Belleville, IL 62220 or contact the HUD OIG Fraud Hotline at 1-800-347-3735 or email hotline@hudoig.gov . Public may view financial policies and procedures addressing fraud that are posted on the St. Clair County website. DR Beneficiaries will be made aware of contractor fraud and other potentially fraudulent activity that can occur in the application process and contractual process. The County will review all contractor information prior to awarding a bid and initiating a contract.

Conflict of Interest

The County does not permit individuals having functions or responsibilities with respect to activities assisted with CDBG, CDBG-DR, COC or HOME funds, or who are in a position to participate in a decision-making process, or gain inside information with regard to these activities, from obtaining a financial interest or benefit from a CDBG, CDBG-DR, CDBG-CV, COC or HOME- assisted activity or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business-ties, during their tenure or for one year thereafter. This provision applies to employees, agents, consultants, officers, or elected/appointed official of the County. Exceptions to this policy can only be approved by HUD upon submission of a written request for an exception.

Applicants having any of the aforementioned positions, relationships or associations that may or could influence the decision-making process or outcome of a request for assistance in any manner, shape or form, must disclose the nature of their association, in order that the

appropriate procedure for facilitating assistance may be followed. Failure to disclose this information may cause immediate termination of the application or a return of program funds after the fact.

SECTION 8: FEDERAL DEBARMENT/SUSPENDED LIST

HUD regulations at 24 CFR Part 24 and 24 CFR Part 85.35, prohibit the use of HUD financial assistance to directly or indirectly employ, award contracts to, or otherwise engage the services of, or fund any contractor or developer during any period of debarment, suspension, or placement in ineligibility status.

As part of property-specific CDBG-DR grant or loan agreements, developers and other contractors are required to provide certification that neither the developer/contractor nor its principals are currently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in the covered transaction.

The System for Award Management (SAM) (<https://www.sam.gov/portal/SAM/#1>) is an electronic, web-based system that identifies those parties excluded from receiving Federal contracts, certain subcontracts, and certain types of Federal financial and non-financial assistance and benefits.

SECTION 9: MONITORING

The County will continuously monitor awardees which will provide quality assurance. The County will determine the areas to be monitored, the number of monitoring visits, and their frequency. Any entity administering CDBG-DR funding will be monitored not less than once during the contract period. The monitoring will address program compliance with contract provisions, including national objectives, financial management, and the requirements of 24 CFR Part 58 environmental reviews.

The County through the Intergovernmental Grants Department will oversee all activities and expenditures of the CDBG-DR funds. Existing County employees will be utilized, and additional personnel and contractors may be hired to aid in the administration of, and to carry out, recovery programs. Not only will these personnel remain involved in ensuring that there are layers of financial control, they also will provide technical assistance to the County, and will undertake administrative and monitoring activities to better assure compliance with applicable requirements, including, but not limited to, meeting the disaster threshold, eligibility, national objective compliance, fair housing, nondiscrimination, labor standards, environmental regulations, and procurement regulations at 24 CFR Part 85 and 2 CFR Part 200.

Each activity funded will meet the disaster threshold and one of HUD's three national objectives, with emphasis on achieving the primary national objective of benefiting low- and moderate-income persons and will be an eligible activity. The County will perform the monitoring in accordance with a CDBG-DR monitoring plan.

The County will further maintain a high level of transparency and accountability by using a combination of risk analysis of programs and activities, desk reviews, site visits, and checklists.

The County will determine appropriate monitoring of grants, considering prior grant administration performance, audit findings, as well as factors such as the complexity of the project. The primary purpose of the County's monitoring strategy is to ensure that all projects comply with applicable federal regulations and are effectively meeting their stated goals. The frequency and areas monitored will be determined by a risk analysis. All projects will be monitored at least once on-site during the life of the activity.

The County will determine the areas to be monitored, the number of monitoring visits, and their frequency. The County will continue to follow all guidelines it uses to monitor projects funded under the regular CDBG program. The monitoring will address program compliance with contract provisions, including, but not limited to environmental reviews, fair housing, Section 3 compliance, compliance with the Davis-Bacon Act as well as other labor standard provisions, procurement regulations, fair housing and equal opportunity requirements, and compliance with the 2CFR 200, program income, and other CDBG financial requirements.

The County has an established a monitoring plan in the St. Clair County Financial Procedures document.

Monitoring Objectives

The County's Intergovernmental Grants Department will be knowledgeable about the content and operation of the County's compliance and ethics guidelines. The County CDBG/HOME programs normally do not contract with a sub-recipient but in the event they would the County will exercise reasonable oversight for the implementation and effectiveness of any sub-recipient programs, through the following objectives:

- Assuring that sub-recipients with operational responsibility are monitored through regular ongoing risk assessment; regularly performing and reviewing risk assessments; and recommending and assuring that appropriate steps are taken to design, implement, or modify compliance activities to reduce the compliance risks identified by risk assessments.
- Assuring that compliance roles and responsibilities are clearly established across the sub- recipient's system and that due care is taken in delegating substantial authority.
- Assuring that sub-recipients implement standards of conduct, policies, procedures and internal control systems reasonably capable of ensuring compliance and reducing misconduct within their organization.

- ❑ Exercising reasonable oversight over compliance activities, to include requesting and receiving information on the implementation and effectiveness of the compliance and ethics program from individuals with day-to-day operational responsibility.
- ❑ Assuring that the sub-recipients compliance standards, procedures and expectations, are effectively communicated through technical assistance and other appropriate means.
- ❑ Assuring that reasonable steps have been taken to achieve compliance with regulations, policies, and procedures throughout the sub-recipient's organization using reasonably designed auditing and monitoring systems as well as periodic evaluation of the compliance program's effectiveness.
- ❑ Assuring that sub-recipients maintain an effective mechanism for employees to report or seek guidance regarding potential or actual wrongdoing, including mechanisms to allow for anonymous reporting, and appropriate safeguards to protect against potential retaliation.
- ❑ Assuring that compliance is promoted and enforced consistently throughout the sub-recipient agency.
- ❑ Reporting on the implementation and effectiveness of the compliance program.
- ❑ Taking such other actions, or making such other recommendations, as are necessary to promote an ethical organizational culture.

Team Members

Monitoring will be carried out primarily by the CDBG-DR staff, Project Coordinator and the Fiscal Manager. The Director will oversee all monitoring activities. The Project Coordinator will report directly to the Director on all monitoring issues.

Monitoring Activities

The monitoring activities will consist of comprehensive and thorough procedures to meet the monitoring objectives above. These procedures and monitoring activities will be documented through the project life cycle and will vary according to their need. The CDBG-DR staff, Project Coordinator and the Fiscal staff will conduct reviews, monitoring, and internal audits of sub-recipients at the Intergovernmental Grants Department Office and onsite if necessary.

SECTION 10: TIMELINESS OF EXPENDITURES

The County uses regular monitoring and reporting to ensure that timeliness standards are met. The CDBG-DR Action Plan in DRGR will provide quarterly spending estimates and completion targets for each project. The CDBG-DR staff/Project Coordinator will track expenditure and completion targets on a monthly basis. At the time of each quarterly report in DRGR, the CDBG-DR staff/Project Coordinator will compare the actual expenditures and completion rates against

the projected expenditures and completion rates within DRGR. The CDBG-DR staff/Project Coordinator will identify any discrepancies. Where there are discrepancies, the CDBG-DR staff and the Project Coordinator will work with sub-recipients to create a plan to return to the anticipated schedule or revise the schedule as necessary. Adjustments and revisions will be submitted to the CDBG-DR staff and Project Coordinator for pre-approval before moving forward to the Executive Director for final approval. Once approved, the adjustments and revisions will be entered into DRGR. Where projects become stalled and will be unable to be completed timely, the Project Coordinator/ Fiscal Manager will reprogram funds to a different activity within the current Action Plan. All revisions will be entered into DRGR by the Community Development Specialist in the next quarter after the project/activity has been cancelled and funds have been identified. The County does not anticipate receiving program income however, should program income be received the County will utilize CDBG-DR program income prior to drawing additional grant funds from the line of credit.

The County requires that each recipient/sub-recipient performs all projects in a timely manner meeting all reporting and compliance measures. The County requires recipient/sub-recipients to demonstrate capabilities and capacity to perform all duties required by contract with the County.

SECTION 11: AUDITS

Please refer to St. Clair County Financial procedures.

Audit Requirements

Audits are required for non-Federal entities that expend more than \$750,000 or more in a year of Federal awards. The County undertakes an annual outside audit performed according to the standards of 2 CFR Part 200.501. An outside audit pursuant to 2 CFR Part 200.501 is required for all sub-recipients expending \$750,000 or more a year. This requirement is included in all agreements. Audits must be undertaken annually.

Uniform Administration Requirements

The County complies with requirements set forth in the following: 2 CFR Part 200. This guidance establishes uniform administrative requirements, cost and audit requirements for Federal awards to all non-Federal entities. Nonprofit sub-recipients must comply with these requirements as well.

SECTION 12: FAIR HOUSING & EQUAL OPPORTUNITY EMPLOYMENT

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

The County is committed to the spirit and intent of these various laws, rules and regulations in the administration and operation of this program and will strive to ensure that all applicants receive fair access and treatment in the receipt and review of all applications in response to request for assistance and in the distribution of its funding resources for programs and services based on availability. The County will make every effort to ensure access to programs/projects by all clients including members of protected classes, vulnerable populations and individuals from underserved communities.

SECTION 13: UNIFORM RELOCATION REQUIREMENTS

The County shall ensure that it has taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, non-profit organizations, and farms) as a result of CDBG activities pursuant to 24 CFR 570.606.

When contemplating any project or program, the County shall:

- Gather complete information identifying all tenants and owners who might be affected.
- Immediately inform any tenant or owner that they are entitled to information and counseling and they should not move unless specifically required to do so until they have received formal notices. Inform them that moving before that has occurred may cause them to give up rights.

Generally, a displaced person under the URA is an individual, family, partnership, association, corporation, or organization which moves from their home, business, or farm or move their personal property, as a direct result of acquisition, demolition, or rehabilitation for a federally funded project. Relocation of displaced persons shall be in conformance with Section 104(d) of the Housing and Community Development Act and the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 as amended, except for the waivers granted in the Federal Register Notice Vol. 88 No. 96 dated May 18, 2023.

SECTION 14: FEDERAL LABOR STANDARDS & DAVIS-BACON WAGE RATES

Federal labor standards provisions are applicable to construction work financed in whole or in part with CDBG-DR funds, except that construction work involving residential property with less than 8 units is exempt. Federal labor standards provisions involve 3 key requirements:

1. Payment of not less than prevailing (Davis-Bacon) wage rates to all laborers and mechanics employed by contractors and subcontractors;
2. Compensation for overtime hours (hours worked over 40 in a workweek at the site of the covered work) at no less than 1 ½ the regular basic rate of pay;
3. The certification and submission of weekly payroll reports for each week work is performed at the site of the covered work.

Both Federal and State Labor Standards and Prevailing Wages are included in all CDBG-DR bids and contracts distributed by the County. Contractors are required to submit weekly certified payroll forms throughout the duration of work performed that document prevailing wages paid to all eligible employees. Certified payroll forms are reviewed by the Project Manager for compliance with both federal and state prevailing wage requirements. Original certified payroll documents are retained by the County.

SECTION 15: INSURANCE REQUIREMENTS

All Contractors/Vendors/Developers/Sub-recipients, with the exclusion of internal County Departments, that will be receiving and/or administering CDBG-DR funds shall provide certificates of such insurance at the time of execution of contract:

- 1) Worker's compensation and employer's liability insurance as required by St. Clair County providing coverage for all claims.
- 2) Comprehensive automobile and vehicle liability insurance covering claims based on personal injuries, including death, and/or damages to property arising from use of motor vehicles, including onsite and offsite operations, and owned, non-owned, or hired vehicles, with not less than \$1,000,000.00 single limits and \$2,000,000.00 aggregate limits.
- 3) Commercial general liability insurance covering claims based on personal injuries, including death, or damage to property arising out of any act or omission of the Contractor/Vendor/Developer/Sub-recipient or of any of its employees, agents, or subcontractors, with not less than \$1,000,000.00 single limits and \$2,000,000.00 aggregate limits.
- 4) The St. Clair County shall be named as an additional insured and the Contractor/Vendor/Developer/Sub-recipient waives subrogation against the County as to said policies. The policies will provide that they will not be cancelled without 30 days prior notice to the County. The insurers will be authorized to do business in Illinois.

The Contractor/Vendor/Developer/Sub-recipient shall require the same insurances from its Sub-contractors. Title Insurance Developers of CDBG-DR funded projects that include acquisition and development shall provide the County with title abstracts as requested. In addition, the Developer shall provide and maintain title insurance on the property to the County in an amount equal to 100% of the grant amount.

SECTION 16: ENVIRONMENTAL REVIEW

CDBG-DR requires that an environmental review be completed for every activity before funds (even non-CDBG-DR funds associated with the activity) are committed or expended. Such environmental reviews must comply with the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed at 24 CFR Part 58. An environmental review must be conducted considering federal laws, authorities, and regulations.

In accordance with 24 CFR Part 58, recipients, owners, developers, sponsors or any other third-party partners cannot take any physical actions on a site, begin construction, commit, expend, or enter into any legally binding agreements that constitute choice limiting actions for any HUD or non-HUD funds before the environmental review process has been completed and the jurisdiction has received a Release of Funds approval. Refer to St. Clair County IGD environmental policies and procedures for further guidance.

SECTION 17: FEMA IDENTIFIED FLOOD ZONES & NATIONAL FLOOD INSURANCE

The County will be including a review of FEMA Flood Hazard Zone maps during the environmental review process. Each construction/rehabilitation/repair project will be individually evaluated for flood risk.

If a project is identified to be located within a FEMA Flood Zone, the County will ensure that any residential, commercial and/or infrastructure projects account for increased flood risk resulting from a variety of factors by elevating and/or otherwise flood proofing to one foot above the elevation recommended by the most recent available federal flood guidance.

The specific steps that these types of structures will need to take include:

- Elevating- the standard would require structures to elevate their bottom floor one foot higher than the most recent flood risk guidance provided by FEMA;
- Flood-Proofing - In situations where elevation is not possible, the standard will require structures to prepare for flooding a foot higher than the most recent flood risk guidance provided by FEMA - for example, by relocating or sealing boilers or other utilities located below the standard of elevation.

Funding will not be approved for acquisition or construction for use in any area that has been identified as having special flood hazards and is not participating in the National Flood Insurance program.

SECTION 18: LEAD-BASED PAINT AND LEAD HAZARDS

The County does not intend to utilize CDBG-DR funds for housing projects, however, should the plan be modified the lead paint procedures will be in effect. Projects that involve the acquisition or renovation of a property built prior to 1978 must be tested for lead based paint. Interim controls and safe work practices are required during construction. In addition, housing assisted with federal funds is subject to the:

- Prohibition of lead-based paint
- Testing all painted surfaces with a HUD approved XRF of any areas that will be disturbed in the renovation of houses built before 1978.
- Elimination of immediate lead-based paint hazards in residential structures

- Notification of the lead hazards of lead-based paint poisoning to purchasers and tenants of residential structures constructed prior to 1978

Paid renovators and multi-family housing maintenance workers who work in pre-1978 housing and child-occupied facilities will be required to meet the training and certification requirements of both HUD - Lead Safe Housing Rule (LSHR) and EPA - Renovation, Repair and Painting Rule (RRP). Paid renovators include renovation contractors, painters and other specialty trades.

Lead Based Paint and Homeowner Repair Program

The County will require that All eligible households requesting assistance through CDBG-DR undergo lead inspection and/or risk assessment for properties built prior to 1978, and where there are children residing in the home under the age of six (6). Inspections shall be conducted by a certified lead-based paint inspector, or a qualified Risk Assessor. The homeowner will be required to have the unit(s) abated if it is determined that lead or lead-based paint hazard conditions are present in the home. The County will not proceed with requests for assistance without a "Letter of Compliance" issued by a state-licensed lead inspector. Visual assessment alone will not be sufficient in meeting inspection requirements. The cost of lead inspections will be included as part of the rehabilitation cost and an inspection will be required when the Rehabilitation Specialist suspects or presumes the presence of lead has been determined for the property.

The County will allow exception to policy regarding lead-inspection and de-leading requirements when:

- A. Circumstances prove to be of an urgent nature. Emergency repairs needed to remove threats considered to be an imminent danger to human life, health or safety, or to protect the property from further structural damage are examples of these types of situations; or
- B. If the rehabilitation will not disturb any painted surface, the exception also applies.

The County will implement and operate its CDBG-DR program under the auspices of federal, state, and local laws, ordinances and systems that address lead poisoning prevention and/or abatement. The County will, as far as practicable, address the elimination of lead-based paint hazards in residential properties that receive federal rehabilitation assistance. Applicants must receive all required and appropriate notices and pamphlets regarding lead hazard information, as well as notices concerning evaluation and lead hazard reduction activities. Acknowledgement forms, documenting all such notifications, shall be kept in each applicant's file.

Evaluation and hazard reduction requirements for homeowner rehabilitation will be determined among three categories based on the level of assistance and shall require paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all painted surfaces are coated with lead -based paint:

- Assistance of up to and including \$5,000 per unit;
- Assistance of more than \$5,000 per unit and up to \$25,000 per unit; and
- Assistance of more than \$25,000 per unit.

This level of assistance is determined by taking the **lower** of:

- Per unit rehabilitation hard costs (regardless of the source of funds); or
- Per unit Federal assistance (regardless of the use of funds)

Assistance of up to and including \$5,000 per unit

Projects where the level of rehabilitation assistance is less than or equal to \$5,000 per unit must meet the following requirements:

The goal is to "do no harm." Therefore, all work must be conducted using lead safe work practices. Workers must be trained in lead safe work practices.

Lead Hazard Inspection/ Evaluation. A lead inspection must be performed, by a lead-certified inspector, if determined there is lead presents, paint testing must be conducted to identify lead-based paint on painted surfaces that will be disturbed or replaced. Alternatively, the County may presume that these surfaces contain lead-based paint.

Lead Hazard Reduction. The County must repair all paint that will be disturbed during rehabilitation, unless such paint is found not to be lead-based paint.

If lead-based paint is detected or presumed, safe work practices must be used during rehabilitation.

Clearance is required by a certified clearance examiner.

Notices that must be provided to owners and tenants:

- The Lead Hazard Information pamphlet;
- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, for rehabilitation projects where the level of assistance is less than or equal to \$5,000 per unit, workers must be trained in safe work practices, notices must be provided to owners and tenants, and clearance must be achieved.

Assistance of more than \$5,000 per unit and up to \$25,000 per unit

Projects where the level of rehabilitation assistance is between \$5,000 and \$25,000 per unit must meet the following requirements:

The goal is to "identify and address lead hazards." A risk assessment is required to identify lead hazards and identified hazards must be addressed by interim controls.

Lead Hazard Evaluation. A risk assessment must be conducted by a qualified professional prior to rehabilitation to find lead-based paint hazards in assisted units, in common areas that service those units, and on exterior surfaces. The risk assessment must include paint testing of any surfaces to be disturbed by the rehabilitation.

Lead Hazard Reduction. If the risk assessment identifies lead-based paint hazards, interim controls must be implemented to address lead-based paint hazards.

Interim controls must be performed by qualified professionals using safe work practices.

Clearance, conducted by a qualified clearance examiner, is required when lead hazard reduction activities are complete.

Options. There are two options, as follows:

- a.) The County is permitted to presume that lead-based paint is present and that lead-based paint hazards exist. In such cases, evaluation is not required. The County must perform standard treatments in lieu of interim controls on all applicable painted surfaces and presumed lead-based paint hazards.
- b.) The County is also permitted to conduct a lead hazard screen instead of a risk assessment. The lead hazard screen has more stringent requirements and is only recommended in units in good condition. If the lead hazard screen indicates that there is no lead contamination, no lead hazard reduction is required. If the lead hazard screen indicates the presence of lead hazards, the County must then conduct a risk assessment. (Note: Passing a lead hazard screen, or a risk assessment, does not eliminate the requirement to perform interim controls on lead-based paint hazards created as a result of the rehabilitation work.)

Notices that must be provided to owners and tenants:

- The Lead Hazard Information pamphlet;
- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, compliance with the Lead Safe Housing Rule for such rehabilitation projects will affect the project planning, timeline, scope of work, contracting and budget.

Assistance of more than \$25,000 per unit

Projects where the level of rehabilitation assistance is over \$25,000 per unit must meet the following requirements:

The goal is to "identify and eliminate lead hazards." A risk assessment is required to identify hazards and any identified hazards must be abated by a certified abatement professional.

Lead Hazard Evaluation. A risk assessment must be conducted prior to rehabilitation to find lead-based paint hazards in assisted units, in common areas that service those units, and on exterior surfaces. The risk assessment must include paint testing of any surfaces to be disturbed by the rehabilitation.

Lead Hazard Reduction. To address hazards identified:

Abatement must be conducted to reduce all identified lead-based paint hazards except those described below. Abatement must be conducted by a certified abatement contractor.

If lead-based paint hazards are detected during the risk assessment on the exterior surfaces that are not to be disturbed by rehabilitation, interim controls may be completed instead of abatement to reduce these hazards.

Clearance is required when lead hazard reduction activities are complete.

Options. There are two options, as follows:

- a.) The County is permitted to presume that lead-based paint hazards exist. In such cases, a risk assessment is not required. The County must abate all applicable painted surfaces that will be disturbed during rehabilitation and all presumed lead hazards.
- b.) The County is permitted to conduct a lead hazard screen instead of a risk assessment. The lead hazard screen has more stringent requirements and is only recommended in units in good condition. If the lead hazard screen indicates that there is no lead contamination, no lead hazard reduction is required. If the lead hazard screen indicates the presence of lead hazards, the County must then conduct a risk assessment. (Note: Passing a lead hazard screen, or a risk assessment, does not eliminate the requirement to perform abatement on lead-based paint hazards created as a result of the rehabilitation work.)

Notices that must be provided to owners and tenants:

- The Lead Hazard Information pamphlet;
- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, compliance with the Lead Safe Housing Rule for such rehabilitation projects will affect the project planning, timeline, scope of work, contracting, and budget. It involves the engagement of a certified abatement contractor.

SECTION 19: Income Eligibility

Annual household income is the anticipated total income from all sources received by the Family head and spouse (even if temporarily absent) and by each additional member of the Family (other than children under the age of 18 years), including all net income derived from assets for the 12-month period following the effective date of certification of income. Annual Income specifically includes and excludes certain types of income as set forth in, and shall be determined in accordance with HUD guidebook determining income.

Documenting Income Eligibility and County Approval

The staff must document income eligibility using source documents. Source documents include but are not limited to items such as wage statements, interest statements, and unemployment compensation statements. Eligibility determinations are based on anticipated income; last year's tax return does not reflect next year's earning (nor does it constitute adequate source documentation). Calculations and copies of source documents must be forwarded to the County for approval of income eligibility of a purchaser prior to sale.

Term Affordability/Continued Affordability

The County does not intend to utilize CDBG-DR for housing activities, however, should the County modify the plan the term affordability procedures will be in effect. The County requires that assisted units remain affordable for at least a minimum period. The County's minimum affordability periods are based on what is required in the federal HOME.

Investment Partnership Program, 24 CFR 92.252(a), (c), (e) and (f), and 92.254, and are as follows:

- Up to \$15,000 - 5 Years
- \$15,001 to \$40,000 - 10 Years
- Over \$40,000-15 years
- New Construction - 20 years

Under HUD rules, the County has three options for ensuring continued affordability of assisted houses:

- **Resale** of the home to the grantee or to another income-eligible buyer;
- **Recapture** all or part of the initial subsidy, via full repayment of the loan, forgiveness of a portion of the principal, or equity-sharing. With recapture, the subsidy funds can be used for another home. Such recaptured funds become Program Income to the CDBG-DR Program;
- **Presumed affordability** of homes in affected neighborhoods. Using analysis of market conditions, the grantee may show that houses will continue to be affordable to LMMI purchasers with conventional mortgage financing.

Initially, the County will use RECAPTURE as the means of ensuring continued affordability.

Affordability: Recapture

If applicable, The County will enforce affordability restrictions on CDBG-DR properties through recapture. The County elects to use recapture, rather than resale, as the means of affordability restriction, because the recapture option is more suited to stabilizing a market where values are declining, and there are challenges to attracting purchasers to move into the neighborhood. Some of the factors that the County considered in choosing to use recapture are the following:

- The homebuyer may sell the property to any willing buyer.
- The recapture option provides grantees and homebuyers with maximum flexibility.
- The homebuyer can resell the property on the open market to any willing buyer at whatever price the market will bear.
- Lenders are generally comfortable with the recapture option, since it does not restrict or affect the resale transaction until the lender's loan has been repaid.
- The grantee can tailor the level of the homebuyer's risk to market conditions.

With Recapture, the sale of the property during the affordability period triggers repayment of the direct HOME subsidy that the buyer received when he or she originally purchased the home, provided that this amount may not exceed the net proceeds from the sale of the property.

Direct subsidy

A direct subsidy consists of any financial assistance that reduces the purchase price from fair market value to an affordable price, or otherwise subsidizes the purchase (e. g., down payment or closing cost assistance, subordinate financing, price below market value).

Net proceeds

The net proceeds of a sale are the sales price minus closing costs and any superior loan repayments.

Principal Residence

Purchasers of CDBG-DR-developed homes must occupy the properties as their principal residence. These stipulations apply for a principal residence:

- A deed restriction or covenant running with the land should incorporate this requirement.
- The loan documents between the purchaser and the program administrator should also incorporate this requirement.

Disclosure Statement

Prospective purchasers must be given hard copies of preliminary disclosure documents that provide the following:

- An explanation of the CDBG-DR program in general terms and its benefits to buyers and the community.
- Applicant's household size and estimate of monthly income, with a statement that the income amount must be verified prior to the Applicant being approved for CDBG- DR assistance.
- A good faith estimate of the amount (or range of amounts) and terms of Homeowner Financial Assistance that Applicant may qualify for, based on an analysis of Applicant's financial and other data provided.
- A general description of a CDBG-DR buyer's obligations for repayment of subsidies, and recapture controls on homes.

During the intake interview or subsequent face-to-face meeting, a representative of the County will review these disclosures with the Applicant and be available to answer questions about them. No purchase will be approved unless disclosures have been made as required.

Deed Restrictions: Principal Residence

In properties that are produced with CDBG-DR funds for homeownership, the County shall require that purchasers maintain the home as their principal place of residence. In order to enforce these requirements, the County shall require that a deed restriction be placed upon all properties produced with CDBG-DR funds.

Proceeds from Sale of CDBG-DR-Developed Properties

Proceeds from the sale of the Project Property shall be returned to the County at the time of transfer of the property to the qualified purchaser. Proceeds from the sale of the property shall mean: (a) the sale price, plus (b) the sum of all CDBG-DR grants and forgivable loans to the property, minus:

- the development costs and developer's fee set forth in the individual project budget attached to the property-specific grant agreement

Depending on the project, there may be no proceeds.

Funds returned to the County after sale of a project property become Program Income to the County for use in another eligible Project.

SECTION 20: REMOVAL OF BLIGHT

The County does not intend to utilize CDBG-DR funds for the stated purpose below, however, should the plan be modified the procedures for demolition and/or removal of structures will take effect. The removal of blight is a CDBG-DR eligible activity under 24 CFR 570.201(d) and meets the national objective of low/moderate income housing. Record keeping guidance for CDBG activities are set forth in 24 CFR 570.506. Geographic Area Demolition and/or removal of demolition debris must take place within disaster impacted areas.

Eligible Properties

Properties that are vacant, blighted, deteriorated beyond repair and necessary to the long-term recovery of the disaster impact zone, may be targeted for demolition. Properties will be owned by the County.

General Program Administration

Respective responsibilities of the Contractor are as follows:

- Removal and abatement of all hazardous materials at each project site, in accordance with local, state and federal environmental requirements.
- Removal and disposal of all demolition, construction debris from each project site in accordance with local, state and federal requirements.
- Restoration of site, including the filling of foundations, installation of loam, seed and fencing as required by contract.
- Fulfilling all contract terms and submitting all required paper work to the County, including the following documents:
 - Payment and Performance Bonds
 - Proof of insurance
 - Certified payroll statements in accordance with State Division of Labor and Federal Davis Bacon wage rates
 - Permits
 - Proof of Utility Disconnects
 - Close-out packages
 - Hazardous waste manifests
 - Demolition dump slips
- Submitting Section 3 reporting requirements to the County.
- Obtaining all necessary permits, ensuring and obtaining documentation of utility terminations, coordinating hazardous material removal with the County's environmental consultant, meeting all labor standard and OSHA requirements.

Respective responsibilities of the Environmental Consultant are as follows:

- Fulfilling all contract terms including submitting testing results, reports, air monitoring results to the County.
- All pre-demolition hazardous testing and reporting and submitting copies to the County.
- All monitoring and oversight of contractor's removal of hazardous material and asbestos contaminated waste and advising the County if there are concerns regarding contractor performance regarding these areas.

Respective responsibilities of the County are as follows:

- Selecting projects and ensuring that projects meet CDBG national objectives and eligibility requirements and appropriately documenting files.
- Assuming all responsibility for the environmental review process in accordance with policies and procedures in Section 23 and compliance with environmental requirements in accordance with Policies and Procedures in Sections 23 and 24.
- Ensuring no Duplication of Benefits occurs in accordance with Duplication of Benefits.
- Ensuring Contractor(s) and Environmental Consultant(s) are not on the Federal Debarment list in accordance with Policies and Procedures in Section 14.
- Reviewing certified payroll statements to ensure compliance with both State and Federal prevailing wage rates in accordance with Policies and Procedures in Section 21.
- Maintaining all file records for projects and ensuring all appropriate documentation is in the file.
- Appropriately bidding the jobs in accordance with applicable local, state and federal requirements.
- Drafting, approval, execution and monitoring of contracts.
- Monitoring both contractor and environmental consultant and ensuring compliance with contract requirements.
- Reviewing all payment requests and ensuring that all costs are necessary, reasonable and in accordance with the contract.
- Filing liens against privately owned properties for work completed at the sites.

Change Orders

The Contractor must submit all change orders to the County for review and approval before work proceeds. These change orders will be amended into the contract upon the County's approval.

Invoices

Invoices must contain specific items accomplished. Back-up documentation must be included with invoices, which verify all costs and ensure that work was completed as required.

Contractor and Environmental Consultant will submit project invoices and the County will review all invoices to ensure all costs are necessary, reasonable and comply with contract. Invoices will be paid within thirty (30) days of completion of review.

Liens

Liens will not be filed against County owned properties.

Procurement/Contractor Selection Process

St. Clair County follows St. Clair County financial procedures requirements regarding procurement.

SECTION 21: HOME REPAIR

The County does not intend to utilize CDBG-DR for funds for Home repair, however, if the plan should be modified this policy will take effect. This policy has been developed as a reference guide for the administration and processing of applicants for the CDBG-DR Homeowner Rehabilitation Grant Program (CDBG-DR). It has been designed to ensure, as much as practicable, a fair and consistent approach in soliciting, selecting, evaluating and determining the eligibility of participating households. The policy further establishes a formal operating format that is intended to be consistent with Community Development Block Grant - Disaster Recovery (CDBG-DR) rules and regulations that govern this program as an eligible activity.

The County, through the St. Clair County Intergovernmental Grants Department, has created the CDBG-DR procedures using standards set by the Department of Housing and Urban Development. The CDBG-DR program would offer 0% forgivable/deferred loans to assist eligible low and moderate- income households within St. Clair County. It is designed to help those St. Clair County homeowners directly impacted by the 2022 flooding make needed repairs to their homes.

To be considered for the CDBG-DR assistance, households must first meet preliminary requirements as outlined:

- The property must be located within the disaster-impacted neighborhoods.
- The home must have been the owner's principal residence on the date of the disaster.
- Total household income cannot be more than 50% of Area Median Income, adjusted for the number of persons residing in the home.
- All property taxes, fees, fines or municipal liens must be current with St. Clair County.
- The property must meet all state and local codes, ordinances and zoning requirements upon completion of project.
- Most importantly, there must be disaster related damage to the property and any unmet need without any duplication of benefits.
- Applicants will be required to submit and certify evidence of any and all assistance received (or lack thereof) at time of applicant including, but no limited to, any FEMA assistance, SBA loans, insurance proceeds etc.

Eligible Repairs

The County's Rehabilitation Inspector shall inspect the housing unit to develop a priority list of health and safety hazards and required repairs. All health and safety issues must be cured with the rehabilitation loan and/or other funds available to the homeowner as a condition of this grant program. Any replacement items shall be of similar size, quality, and shape unless noted

otherwise. Medium grade and/or construction grade materials shall be utilized only. If the owner chooses an item which increases the cost due to, but not limited to materials, quality, energy conservation, etc., the difference between the specified cost and the owner's request shall be the responsibility of the owner.

The CDBG-DR will provide funds to perform rehabilitation activities and provide materials to achieve minimum compliance with all federal, state and local laws. The maximum grant or loan amount to be awarded to an eligible homeowner will be capped at \$24,000. All substitutions or changes in materials must be submitted in writing and receive approval from the County.

Ineligible Repairs

The general physical guidelines for the rehabilitation of existing residential properties through regular CDBG funding provides minimum design and construction criteria. Therefore, the County has determined the following as ineligible for repair:

- Additional bathrooms/bedrooms
- Landscaping
- All items of a luxury nature

Eligible Costs

In administering the CDBG-DR program, the County acknowledges that there are expenses necessary in helping qualified homeowners meet established housing rehabilitation standards and will endeavor to ensure that all costs are customary and reasonable in providing this service. Reasonableness of eligible rehabilitation costs will be determined by the Rehabilitation Specialist and approved by the County's Project Coordinator.

Allowable Contractors

The County will not directly or indirectly employ, award contracts, or engage the services of any contractor or sub-recipient during any period of debarment, suspension or placement on ineligibility status. Program staff will review federal and state lists of debarred, suspended and ineligible contractors before any CDBG-DR funds are committed.

Contractors chosen, directly or indirectly, must meet all state licensure requirements and have all necessary insurance coverage for the types of work to be performed on behalf of the homeowner. The information provided by such contractors will be kept on file.

The minimum requirements for contractors are as follows:

- A. Illinois Contractor's license or trade license; or
- B. Registration as an Illinois Home Improvement Contractor;

Additionally, all contractors must have proof of:

- A. Workman's compensation insurance at statutorily required limits; and

- B. Property, Auto and liability insurance; and
- C. Demonstrated experience in the appropriate trade(s).

The certificate of insurance shall include property damage and liability insurance with appropriate limits and amounts that indemnify St. Clair County, the property owner, and any sub-contractor against claims for injury and damage which may occur or result from work performed pursuant to a contract agreement.

Marketing & Outreach

The County is committed to ensuring that its programs and services are available and accessible to all income eligible households. The County will operate this program within the context of fairness in order to promote awareness of available programs and services. The County affirmatively strives to encourage and further fair housing initiatives, whether acting on its own, or with and/or through, other public and private-sector organizations.

The CDBG-DR will be marketed through a variety of print and broadcast media outlets. Program availability and information will be conveyed through direct mailings, informational meetings, press releases, newspaper ads, public notices to local agencies serving low and moderate-income households, religious establishments and on the County's official website.

Selection Process

The County will receive, review and process applications on a first-come, first-served basis. However, to ensure program funds address housing rehabilitation with more critical needs, applications involving emergencies, the elderly, and those seeking to address accommodations for those with disabilities will take priority over applications received that are not of an urgent nature. County staff reserves the right to assign priority status to any emergency application as necessary.

Eligible Applicants

The program is available to owner-occupants of the St. Clair County only and is reserved for homeowners who maintained the property as their primary place of residence on the date of the disaster. Proof of homeownership is required and shall be evidence by a copy of a deed indicating the name(s) of the applicant(s), length of ownership, and the property having a physical location within the designated areas.

Dwellings that are investor-owned and unoccupied by the owner will not be eligible to participate in this program.

Ownership and Residency

Ownership status in the property is supported by documentation of physical evidence that the owner(s) of record reside in the property under consideration for assistance.

Documentation that meets these criteria will consist of the following:

- A. Copy of Deed;
- B. Leasehold Agreement;
- C. Trust Agreement;
- D. Copy of most recent mortgage billing statement; and
- E. Copy of most recent utility billing statements to including service for cable or phone.

Further, sufficient source documentation showing that the home was the owner's principal place of residence on the date of disaster will be required.

Income

HUD establishes income guidelines for CDBG-DR program participation. HUD calculates these income levels annually and sets forth the maximum limit at 50% of Area Median Income (AMI), adjusted for family household size. Consequently, these amounts may change without notice during the program year. St. Clair County staff should refer to the HUD web site at: www.hud.gov for updates.

THE COUNTY WILL USE THE "ADJUSTED GROSS INCOME" DEFINITION OF ANNUAL INCOME IN DETERMINING THE ELIGIBILITY OF PROGRAM PARTICIPANTS.

- The County limits participation in this program for existing homeowners earning no more than 50% of Area Median Income, as defined by the Department of Housing and Urban Development (HUD).
- Household income may not exceed the income limits in effect at the time of application.
- Income is defined as the income earned from all household members age 18 years and above.
- Adult members, 18 to 23 years of age, who are attending school away from home on a full-time basis, require that the first \$480.00 in earned income be included in the calculation of household income.
- Income includes earnings from employment, unemployment, government benefits, investments, other cash-generating activities, etc.
- Refer to The Technical Guide for Determining Income and Allowances for a complete list of acceptable types of income and whose income to count.
- Income from employment for full-time employees will be calculated from the applicant's most recent current consecutive two months' pay, and projected forward at the same level of earnings for the next 12 consecutive months;
- For part-time hourly employees, Disaster Recovery staff will calculate the year-to-date income from the most recent pay stub and divide the earnings by the number of weeks covered through the year, in order to find the average amount of weekly earnings. The weekly earnings will then be multiplied by 52 and divided by 12 to calculate monthly gross income. If the year-to-date income covers less than three

months in the current year, staff may include the average year-to-date earnings from the prior calendar year in addition to the current year;

- Income from overtime, commissions, ongoing stipends, shift differential pay, and other sources will be averaged (using year-to-date earnings) and included in the applicant's gross monthly income. Exceptions may be considered for applicant's receiving one-time, non-recurring bonuses or relocation benefits; Interest income from investments such as savings, money market, certificates of deposit, dividend income from mutual fund accounts and other income-generating assets will be included in the applicant's household income;
- Current monthly income payments from retirement accounts (including social security and pensions), alimony, and other steady, ongoing sources will be included in the applicant's gross monthly household income calculation; and
- All forms of income from non-applicant spouses and other adult household members will be included in the gross monthly income calculation, regardless of the taxability of such income;
- Income from seasonal and part-time jobs such as coaching, lecturing, test proctoring, etc., will be included in the definition of household income, when the work can reasonably be expected to continue;
- Current two years of tax returns.

Self Employed Borrowers

For self-employed borrowers, the following documents may be required:

- A year-to-date profit and loss statement prepared and signed by a Certified Public Fiscal Manager, with information covered through the last quarter;
- A year-to-date-balance sheet, prepared to reflect the financial position of the business at a specific point in time; and/or
- A signed letter of explanation regarding the applicant's anticipated gross annual income from earnings covering the next 12 months.

Verification of income must be completed before assistance is provided.

Income will need to be re-certified if more than six (6) months has elapsed beyond the initial time funding was approved.

Property Standards

All dwelling units that require rehabilitation must meet all applicable state and local building codes, zoning ordinance requirements and federal HQS. The County will require home rehabilitation to meet or exceed current Illinois State Building Code, and the State Sanitary Code that stipulates the minimum standards for human habitation.

The County encourages the incorporation of "Green" building improvements when economically feasible to provide long-term affordability, increased sustainability through lower

fuel costs, and attractiveness of housing and neighborhoods. Rehabilitated residential units are also encouraged to meet "Energy Star" certification, which provides added benefits to homeowners through improved standards for energy efficiency that ultimately lead to greater long-term affordability. Properties found to be in gross states of disrepair will not be considered economically viable for funding under the CDBG-DR HRGP. Program applicants seeking financial assistance for rehabilitation work beyond the economic means and scope of work of the program must consider private financing sources for loan arrangements that may be able to address that level of need. The amount of assistance is limited to a one-time occurrence per property and is subject to availability.

Structure of CDBG-DR Homeowner Repair Assistance

The County will administer the CDBG-DR as 0% deferred payment forgivable loan over the established affordability period.

SECTION 22: INFRASTRUCTURE

St. Clair County's CDBG-DR Action Plan allocate funds Infrastructure Projects. HUD has approved these Action Plan and entered into a grant agreement with the County. Infrastructure Projects are a CDBG-DR eligible activity under 24 CFR 570 part 200 and meets the national objective of low/moderate income area benefit.

General Program Information

The County will simultaneously implement several separate Infrastructure Projects within the flood disaster impact zone.

These are a combination of projects that are a direct result of the disaster and that are part of the long-term recovery of the neighborhood that will leave the community sustainably positioned to meet the needs of the post-disaster population and will assist in furthering prospects for growth.

The County will have a full-time CDBG-DR staff who will operate out of the Intergovernmental Grants Department and report on DR projects to the Project Coordinator and the Executive Director.

The CDBG-DR staff and Project Coordinator will be responsible for coordinating the planning, development, design, construction, monitoring, reporting and completion of all infrastructure CDBG-DR projects.

Construction of public infrastructure will consist of projects as defined in the CDBG-DR action plan.

Applications will be received from communities requesting assistance and required to document necessary to document the need.

The 2022 flood disaster caused millions of dollars of damage in St. Clair County and will continue to do so until infrastructure is addressed.

Public infrastructure projects will require a licensed architect/engineer (depending on project), which will be procured by Request for Proposals (RFP) to design the facilities in accordance with HUD/FEMA/local standards, as well assist in bidding the project and construction management.

St. Clair County, Illinois Request for Proposals for Engineer Services ENGINEER EVALUATION CRITERIA

The Selection Committee will screen and rank all proposals. Interviews may be conducted as part of the ranking process. Proposals received in reply to this request will be evaluated using the following criteria and scored based on a maximum of 120 points. Price will not be a part of the Selection Committee's selection criteria in the procurement of engineer services; rather, qualifications will be evaluated, and the most qualified competitor will be selected, subject to negotiations of fair and reasonable compensation.

Qualifications	Total Points
1. Cover letter addressing understanding of CDBG-DR & ADA	20
2. Executive Summary	20
3. Statement of Qualifications	20
4. Previous Experience with Sidewalk Projects	20
5. Previous Experience with CDBG-DR/ADA	20
6. Certifications	20
7. Total	120

FIRM:	Total Points
1. Cover letter addressing understanding of CDBG-DR & ADA	
2. Executive Summary	
3. Statement of Qualifications	
4. Previous Experience with Sidewalk Projects	
5. Previous Experience with CDBG-DR/ADA	
6. Certifications	
7. Total	

Printed Name of Scorer: _____

Signature: _____ Date: _____

TERMS

- A. **Legal Compliance:** Work performed, and plans produced shall comply with all state, environmental, statutory, legal process, OSHA, Davis Bacon and the Fair Labor Standards Act.
- B. **Acceptance of Proposal:** The County reserves the right to reject any and all proposals and to waive informalities, if, at its discretion, the interests of the county will be best served thereby.
 - a) The County reserves the right to negotiate the specified dollar amount, or any portion of that amount. The County reserves the right to negotiate contract changes following the award.
 - b) If there is any conflict between these documents and the proposal, these documents shall control.
 - c) The County reserves the right to cancel this RFP in writing or postpone the date and time for submitting proposals at any time prior to the proposal due date. The County reserves the right to stop the project if it is in the best interest of the County.
 - d) No proposer shall have a right to make a claim against the County in the event the County accepts a proposal or does not accept any proposals.
- C. **Validity of Proposals:** Proposals must be valid for at least 60 days.
- D. **Insurance:** The Contract shall be effective only upon approval by the County of acceptable evidence of insurance required below, issued by insurers admitted within the State of Illinois. Such insurance shall be in force on the date of execution of this contract and shall remain continuously in force for the duration of the contract. The Engineer shall provide evidence of workers' compensation insurance covering its employees, and evidence of general liability insurance naming the County, its officers and employees as additional insureds under the policy, as follows:
 - a) Workers' Compensation insurance that meets the statutory obligations.
 - b) Commercial General Liability insurance with limits of at least \$1,000,000 general aggregate, \$1,000,000 products - completed operations, \$1,000,000 personal and advertising injury, \$1,000,000 each occurrence, \$50,000 fire damage and

\$5,000 medical expense any one person. The policy shall be on an occurrence basis, shall include contractual liability coverage and the County shall be named an additional insured. This coverage shall be maintained for one year after final completion and acceptance of the Project by the City.

- E. **Addenda to RFP:** Any changes, additions or clarifications to the RFP will be made by written Proposal addenda.
- a) Such addenda will be sent to all proposers receiving the original RFP and will become part of the Proposal package, having the same binding effect as provisions of the original proposal.
 - b) All addenda, amendments and interpretations of this solicitation shall be in writing. The County shall not be legally bound by any amendment or interpretation that is not in writing. Only information supplied by the County in writing or in this RFP should be used in preparing Proposal responses. All contact that a proposer may have had before or after receipt of this RFP with any individuals, employees, or representatives of the County, and any information that may have been read in any news media or seen or heard in any communication facility regarding this proposal should be disregarded in preparing proposal responses.
 - c) The County does not assume responsibility for receipt of any addendum sent to proposers.
 - d) A copy of all addenda issued must be signed and returned with your proposal.
- F. **Contract and Conditions:** The selected firm or individual will be required to enter into a contract with the County. Additional contract conditions may be required, depending upon the nature and extent of the services to be provided. The County reserves the right to negotiate a change or modification to any of the proposed contractual conditions.

Certifications

Community Development Block Grant – Disaster Recovery (CDBG-DR)

**Financial Management and Grant Compliance Certification
Requirements for Local Government Grantees
2021 and 2022 Disasters**

Instructions to grantees:

The term “grantee” refers units of general local government or “local government grantees” that received a direct allocation from HUD of Community Development Block Grant Disaster Recovery (CDBG-DR) funds.

If required an appropriations act, grant agreements will not be executed until the Secretary has issued a certification for the grantee. This Appropriations Act requires the Secretary to certify that the grantee has:

- Proficient financial controls in place;
- Proficient procurement processes in place;
- Adequate procedures to prevent any duplication of benefits as defined by section 312 (42 U.S.C. 5155) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) (Stafford Act);
- Adequate procedures to ensure timely expenditure of funds;
- Adequate procedures to maintain comprehensive websites regarding all disaster recovery activities assisted with the CDBG-DR funds; and
- Adequate procedures to detect and prevent fraud, waste, and abuse of funds.

CDBG-DR Certification Checklist:

HUD is adopting a revised process for implementing CDBG-DR grants whereby HUD will incorporate applicable provisions of the Consolidated Notice, to the extent they are consistent with future appropriations acts, in a Federal Register notice that announces allocations of the appropriated CDBG-DR funds (the “Allocation Announcement Notice”). The Allocation Announcement Notice cross references specific provisions of the Consolidated Notice and includes waivers and alternative requirements applicable for the subject grants. The Allocation Announcement Notice also adds or modifies requirements of the Consolidated Notice as necessary to comply with statutory requirements.

The Consolidated Notice describes the grant award process for CDBG-DR grantees, including the certification of financial controls and procurement processes and adequate procedures for proper grant management in Section III.A.1 of the notice. All CDBG-DR grantees must complete the Financial Management and Grant Compliance Certification Requirements and submit the Financial Management and Grant Compliance Certification Checklist (the “Certification Checklist”) to enable certification by the Secretary. This document is the Certification Checklist and incorporates all the Financial Management and Grant Compliance Certification Requirements.

If a CDBG-DR grantee is awarded a subsequent CDBG-DR grant, HUD will rely on the grantee’s prior submissions provided in response to the Financial Management and Grant Compliance Certification Requirements in the applicable Federal Register notice. HUD will continue to monitor the grantee’s submission and updates made to the policies and procedures during the normal course of business.

Note: The grantee must notify HUD of any substantial changes made to these submissions.

If a CDBG-DR grantee is awarded a subsequent CDBG-DR grant, and it has been more than three years since the executed grant agreement for the original CDBG-DR grant or a subsequent grant is equal to or greater than ten times the amount of the original CDBG-DR grant, grantees must update and resubmit the required documents with the completed Certification Checklist to enable the Secretary to certify that the grantee has in place proficient financial controls and procurement processes, and adequate procedures for proper grant management.

Financial Management and Grant Compliance Certification Requirements for Local Governments

If the grantee believes it complies with the requirement, the grantee should check the affirmation (e.g., the grantee “affirms” statement) under each question. The grantee must attach the required documentation, including the appropriate cross references in each Part of the Certification Checklist to demonstrate how the grantee will comply with the requirements. Most statements include citations in brackets, which have been provided for convenience to identify sources that served as the basis for the certification. The statements in this document reflect existing requirements and should not be read to impose additional requirements. Upon completion, a grantee must submit this checklist and the requested documentation to the grantee’s designated HUD representative.

Note: Grant Managers/CPD Representatives and Financial Analysts can assist the grantee in completing the Certification Checklist. grantees may contact their assigned Grant Manager/CPD Representative for questions on this checklist.

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Certification Checklist for Local Government CDBG-DR Grantees
Name of Grantee: St. Clair County
Date of Submission: 07/19/2023

REQUIRED DOCUMENTATION

Attach the following documents. Please select the corresponding box to signify that the documentation has been attached (or received separately).

The most recent single audit.	☒
The most recent comprehensive annual financial report (CAFR).	☐
Procurement policies and procedures relevant to the CDBG-DR grant.	☒
Policies and procedures governing the use of program income.	☒
Policies and procedures that prevent duplication of benefits.	☒
Policies and procedures to ensure timely expenditures.	☒
Policies and procedures to maintain a comprehensive website.	☒
Policies and procedures to detect and prevent fraud, waste, and abuse.	☒

In the table below, please list the file names/identifiers, title of the documents, and page numbers, if applicable, for all attachments. Additional attachments can be listed in the tables at the end of the checklist.

Reference File Name/Identifier	Title of Document	Relevant Page Number (s)	Related Certification Question
Financial Policies and Procedures			
CDBG-DR Procedures			
CDBG-DR Duplication of Benefits Procedure			
Most Current Audit			

OPTIONAL DOCUMENTATION: Grantees can choose to provide additional documentation to support their certification. If providing additional documentation, grantees should list the file names/identifiers, title of the documents, page numbers, and related certification question the documentation is addressing in the table below. Additional attachments can be listed in the tables at the end of the checklist.

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

PART A. Financial Management Controls

The grantee must have proficient financial controls. For purposes of the Secretary's certification, a grantee has in place proficient financial controls if the following statements are true:

1) The most recent single audit does not indicate weaknesses, deficiencies, or concerns related to CPD programs? [Section III.A.1.a.(1)(a)]	☒ Yes ☐ No
2) The most recent CAFR does not indicate weaknesses, deficiencies, or concerns? [Section III.A.1.a.(1)(a)]	☐ Yes ☐ No
3) If the single audit indicates deficiencies related to CPD programs, the grantee has documentation showing how those weaknesses have been or are being addressed? [Section III.A.1.a.(1)(a)]	☐ Yes ☐ No ☒ N/A
4) If the CAFR does indicate deficiencies, the grantee has documentation showing how those weaknesses have been or are being addressed? [Section III.A.1.a.(1)(a)]	☐ Yes ☐ No ☒ N/A
5) Has the grantee completed and submitted the certification documentation required in the applicable Certification Checklist? [Section III.A.1.a.(1)(b)]	☒ Yes ☐ No

The grantee should select one of the statements below.

- Grantee affirms that it does not have weaknesses, deficiencies, or concerns in the single audit or CAFR. ☒

OR

- If the grantee indicated weaknesses, deficiencies, or concerns related to CPD programs, the grantee has included documentation to address the weakness, deficiencies, or concerns. ☐

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question
Single Audit		24	

PART B. Procurement Processes

The grantee must have in place proficient procurement processes. For purposes of the Secretary's certification, a grantee has in place proficient procurement processes if the following statement is true.

1) The grantee has adopted the specific procurement standards at 2 CFR 200.318 through 2 CFR 200.327. [Section III.A.1.a.(2)(b)(i)]
2) The grantee has adopted procurement standards that uphold the principles of full and open competition. [Section III.A.1.a.(2)(b)]
Grantee affirms it meets this requirement: ☒

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question
Financial Policies and Procedures			

Note: As required by Consolidated Notice, the grantee's Implementation Plan must indicate which personnel or unit is responsible for CDBG-DR procurement, along with contact information.

PART C. Procedures for Prevention of Duplication of Benefits

The grantee must have adequate procedures to prevent any duplication of benefits as defined by section 312 (42 U.S.C. 5155) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.). For purposes of the Secretary's certification, a grantee has adequate procedures to prevent any duplication of benefits if the following statements are true:

1) The grantee's Duplication of Benefits policies and procedures include a uniform process that: - determines all disaster assistance received by the grantee or applicant and all reasonably identifiable financial assistance available to the grantee or applicant, as applicable, before committing funds or awarding assistance; - determines a grantee or an applicant's unmet need(s) for CDBG-DR assistance before committing funds or awarding assistance; and - requires beneficiaries to enter into a signed agreement to repay any duplicative assistance if they later receive additional assistance for the same purpose for which the CDBG-DR award was provided. [Section III.A.1.a.(3)(a) – (c)]
2) The grantee's identifies a method to monitor compliance with the agreement for a reasonable period (i.e., a time period commensurate with risk) and articulates this method in its policies and procedures, including the basis for the period during which the grantee will monitor compliance. This agreement must also include the following language: "Warning: Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18 U.S.C. 2, 287, 1001 and 31 U.S.C. 3729." [Section III.A.1.a.(3)(c)]

- 3) The policies and procedures provide that before the award of assistance, the grantee will use the best, most recent available data from FEMA, the Small Business Administration (SBA), insurers, and any other sources of local, state, and Federal sources of funding to prevent the duplication of benefits. [Section III.A.1.a.(3)(c)]

Grantee affirms it meets this requirement: ☒

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question
Duplication of Benefits Procedures			

Note: As required by applicable Federal Register notices, the grantee's Implementation Plan must indicate which personnel or unit is responsible for DOB compliance, along with contact information.

PART D. Procedures to Determine Timely Expenditures

A grantee must have adequate policies and procedures to determine timely expenditures. For purposes of the Secretary's certification, a grantee has adequate procedures to ensure the timely expenditure of funds if the following statement is true:

- 1) The grantee's timely expenditure policies and procedures indicate how it will track and document expenditures of the grantee and its subrecipients (both actual and projected reported in the performance report); how it will account for and manage program income; how it will reprogram funds in a timely manner for activities that are stalled; and how it will project expenditures of all CDBG-DR funds within the period provided in Section V.A. of the Consolidated Notice and applicable Allocation Announcement Notice. [Section III.A.1.a.(4)]

Grantee affirms it meets this requirement: ☒

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question
Financial Policies and Procedures			

Note: As required by applicable Federal Register notices, the grantee's Implementation Plan must indicate which personnel or unit is responsible for timely expenditures, along with contact information.

PART E. Procedures to Maintain a Comprehensive Website

A grantee must have adequate policies and procedures to maintain a comprehensive accessible website. For purposes of the Secretary's certification, a grantee has adequate procedures to maintain a comprehensive website if the following statements are true:

- 1) The policies and procedures indicate to HUD that the grantee will have a separate webpage dedicated to its disaster recovery activities assisted with CDBG-DR funds and meet all requirements in the applicable *Federal Register* notice(s).

Note: The grantee's policies and procedures must indicate that the required items will be on its website. The required items in Section III.D.1.e of the Consolidated Notice are:

- the action plan created using DRGR (including all amendments);
- each performance report (as created using the DRGR system);
- citizen participation plan;
- procurement policies and procedures;
- all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and
- a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website. [Section III.A.1.a.(5)]

- 2) For items required in Section III.D.1.d of the Consolidated Notice to be available to the public on its website, the grantee will make these documents available in a form accessible to persons with disabilities and those with limited English proficiency. [Section III.A.1.a.(5)]

- 3) The grantee will take reasonable steps to ensure meaningful access to their programs and activities by LEP persons, including members of protected classes, vulnerable populations, and individuals from underserved communities as described in Section III.D.1.d of the Consolidated Notice.

[Section III.A.1.a.(5)]

- 4) The grantee will update its website at least quarterly. [Section III.A.1.a.(5)]

Grantee affirms it meets this requirement: ☒

Please provide a link to the grantee's CDBG-DR Website, if available.

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question
CDBG-DR Policies & Procedures			
https://www.co.st-clair.il.us/departments/intergovernmental-grants/commur			

Note: As required by applicable Federal Register notices, the grantee's Implementation Plan must indicate which personnel or unit is responsible for website management, along with contact information.

PART F. Procedures to Detect Fraud, Waste, and Abuse of Funds

The grantee must have adequate procedures to detect fraud, waste, and abuse of funds. For purposes of the Secretary's certification, a grantee has adequate procedures to detect fraud, waste, and abuse of funds if the following statements are true:

1) The grantee has policies and procedures to detect fraud, waste, and abuse. The grantee's procedures are adequate if the procedures indicate: a. how the grantee will verify the accuracy of information provided by applicants; b. the criteria to be used to evaluate the capacity of potential subrecipients; and c. the frequency with which the grantee will monitor other agencies that will administer CDBG-DR funds, how it will monitor subrecipients, contractors, and other program participants, and why monitoring is to be conducted and which items are to be monitored. [Section III.A.1.a.(6)(a)-(c)]
2) The grantee has or will hire an internal auditor that provides both programmatic and financial oversight of grantee activities, and has adopted policies that describes the auditor's role in detecting fraud, waste, and abuse (which must be submitted to HUD). [Section III.A.1.a.(6)(d)]
3) The grantee has a written standard of conduct and conflicts of interest policy that complies with the requirements of 24 CFR 570.489(g), 24 CFR 570.489(h), and other sections described in the applicable Federal Register notice, which includes the process for promptly identifying and addressing such conflicts. [Section III.A.1.a.(6)(e)(i)]
4) The grantee assists in investigating and taking action when fraud occurs within the grantee's CDBG-DR activities and/or programs. All grantees receiving CDBG-DR funds for the first time shall attend and require subrecipients to attend fraud-related training provided by HUD OIG, when offered, to assist in the proper management of CDBG-DR funds. [Section III.A.1.a.(6)(f)]
5) The grantee indicates that instances of fraud, waste, and abuse will be referred to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). [Section III.A.1.a.(6)(f)]
6) The grantee has procedures that indicate how the grantee will make CDBG-DR beneficiaries aware of the risks of contractor fraud and other potentially fraudulent activity that can occur in communities recovering from a disaster. Grantees must provide CDBG-DR beneficiaries with information that raises awareness of possible fraudulent activity, how the fraud can be avoided, and what local or state agencies to contact to take action and protect the grantee and beneficiary investment. [Section III.A.1.a.(6)(f)]
7) The grantee's procedures address the steps it will take to assist a CDBG-DR beneficiary if the beneficiary experiences contractor or other fraud. If the beneficiary is eligible for additional assistance as a result of the fraudulent activity and the creation of remaining unmet need, the procedures also address what steps the grantee will follow to provide the additional assistance. [Section III.A.1.a.(6)(f)]
Grantee affirms it meets this requirement: ☒

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question
Financial Policies and Procedures		8-12,64	
CDBG DR-Policies and Procedures		7-9	

CERTIFICATIONS

As required by the Consolidated Notice and the Allocation Announcement Notice, the grantee must make the certification below by signing where indicated.

Compliance Certification

The grantee certifies that: it has reviewed the requirements of Public Law(s) 117-328, which appropriates CDBG-DR funds, and the Consolidated Notice and Allocation Announcement Notice that establish the rules, waivers, and alternative requires and allocate CDBG-DR funds; that its responses to this checklist and submitted supporting documentation are accurate; that it will adhere to the controls, standards, processes, corrective actions, and procedures it described in this checklist and supporting documentation; and that it has in place proficient financial controls and procurement processes and that it has established adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, to maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, and to detect and prevent waste, fraud, and abuse of funds.



Signature of Certifying Official

Rick Stubblefield

(Printed Name of Certifying Official)

7/19/23

(Date)

Financial Management and Grant Compliance Certification Requirements for Local Governments

Additional attachments can be listed in this table.

[illegible]

Standard Form 424

The grantee will submit SF 424 executed by an authorized official.