

Alabama Department of Economic and Community Affairs (ADECA)

2020 CDBG-DR Public Action Plan for Hurricanes Sally and Zeta

Amendment No. 4 (Substantial)

Submitted to HUD:

Approved by HUD:

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4. Grantee Proposed Use of Funds

Overview. ADECA is the lead agency and responsible entity for administering 501,252,000.00 in CDBG-DR funds allocated for disaster recovery. ADECA has prioritized programs that will assist in meeting the short- and long-term needs of impacted citizens and communities in accordance with the unmet needs analysis and input from community stakeholders. The unmet needs analysis indicates there are unmet needs in three primary recovery sectors: (1) Housing; (2) Infrastructure, and (3) Economic Revitalization. ADECA’s program design aims to address these unmet needs and increase resilience against future disasters in impacted community needs.

By far, the largest area of unmet need is in the housing sector, followed by economy, then infrastructure. The State, in partnership with eligible local governments, will deliver a complementary suite of programs to address unmet needs in each sector. Further, the State intends to implement programs that result in mitigation and resilience improvements in impacted areas, creating hardened housing, infrastructure, and communities that can better weather the impacts of future disasters.

Based on the best available data at time of publication, the unmet need in the housing sector accounts for over 90% of the total remaining unmet need in impacted areas. As such, the largest portion of program funding is dedicated to housing recovery efforts, with a specific focus on restoration and hardening of single-family owner- and renter-occupied units. Proposed housing activities are further described in the program description section below.

Although the unmet needs analysis revealed only a small portion of unmet needs in the economic revitalization and infrastructure sectors, feedback from public hearings, listening sessions, and damage assessments conducted by ADECA revealed infrastructure and economic development programming to be a top priority for impacted communities. In an effort to deliver a comprehensive recovery, the State has dedicated allocations to fund both sectors in response to this feedback. Failing to adequately address needs in these sectors would be to neglect to recognize the cascading impacts of disaster and interconnected nature of housing, infrastructure, and economy.

Because the State understands that available data on infrastructure impacts and unmet needs is preliminary, and because local stakeholders have indicated a strong need for infrastructure and/or mitigation activities, a portion of grant funds greater than the percentage of unmet needs has been dedicated to the infrastructure sector.

Budget by Category		
	Dollars Allocated	% of Programs Budget
Housing	\$ 375,991,456.00	80%
Infrastructure	\$ 68,420,898.00	15%
Economic Development	\$ 22,806,966.00	5%
Total	\$ 467,219,320.00	

Table 1: ADECA Budget by Category

Up to five (5) percent of the overall grant allocation will be used to cover costs associated with administration of the grant. Funds have been allocated to the administration budget to fund activities such as planning for, monitoring, and managing the CDBG-DR grant.

To maximize the amount of funds that benefit storm impacted communities, the State will not allocate the full fifteen (15) percent of grant funds to planning activities, as allowed by HUD. Instead, up to **2.66 percent** of the overall grant is set aside for planning activities. Planning activities include initiatives such as studies, analyses, and additional planning and capacity building efforts to aid eligible local government partners to develop additional recovery and resilience programs and initiatives. Planning funds may also support the design and implementation of disaster recovery initiatives outlined in this Action Plan.

High Level Budget	
[A] Total Budget ,	\$ 501,252,000.00
[B] Admin Budget	\$ 20,679,589.00
[C] Planning Budget	\$ 13,353,091.00
[D] Programs Budget	\$ 467,219,320.00

Table 52: ADECA High Level Budget Breakdown

As required by the Federal Register, the State will spend a minimum of 80% of the total allocation in the HUD-identified MID areas of Mobile, Baldwin, Clarke, and Escambia Counties. Remaining funds may be used to carry out eligible activities in State-Designated MID areas. Additionally, no less than 70% of the total allocation will be expended to benefit Low- to Moderate-income persons. All proposed programs will include some disaster recovery related mitigation initiatives, as well as allow for stand-alone mitigation activities to ensure the State complies with the 15% mitigation expenditure target.

The State will implement the Home Recovery Alabama Program (HRAP) and the Local Recovery Planning Program (LRP). Subrecipient partners will deliver other housing, infrastructure, and economic revitalization recovery efforts, to be further defined as an outcome of local planning efforts. All programs outlined in this program are subject to funding availability.

Program Budget

The budget table included below outlines how funds are allocated across each initiative described above. Funding will be used to address all three (3) HUD National Objectives, which are abbreviated in the table as follows:

- Low-to Moderate-Income: LMI
- Elimination of Slum and Blight: SB
- Meet an Urgent Need: UN

a. Program Budget

Program Category	Program	Budget	HUD identified MID Budget	Grantee identified MID Budget	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	Rehab	\$291,080,000.00	\$247,730,000.00	\$43,350,000.00	58.07%	\$350,000.00	LMI	0
	Buyout	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	New Construction	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Other	\$84,911,456.00	\$63,911,456.00	\$21,000,000.00	16.94%	\$0.00	LMI, SB, UN	0
Economic Revitalization	Workforce Training	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Business Grants	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Other	\$22,806,966.00	\$17,244,769.00	\$5,562,197.00	4.55%	\$0.00	LMI, SB, UN	0
Infrastructure	Water/sewer Improvements	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Health Facilities	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Other	\$68,420,898.00	\$51,734,306.00	\$16,686,592.00	13.65%	\$0.00	LMI, SB, UN	0
Public Services	Legal Services	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Housing Counseling	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
Mitigation	Mitigation	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	0	0
Admin	Admin	\$20,679,589.00	\$16,543,671.00	\$4,135,918.00	4.13 %	\$0.00	0	0
Planning	Planning	\$13,353,091.00	\$5,814,818.00	\$7,538,273.00	2.66%	\$0.00	0	0
Total		\$501,252,000.00	\$402,979,020.00	\$98,272,980.00	100.00%			

Data Source(s): ADECA Action Plan

Connection to Unmet Needs. As required by the 87 FR 6364, and 87 FR 31636, ADECA will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs **in other areas** that received a Hurricane Sally and Hurricane Zeta presidential major disaster declaration.

This Action Plan primarily considers and addresses housing, infrastructure, and economic development unmet needs along with mitigation activities incorporated in all programs. The allocations for each recovery program are based on the Unmet Needs Analysis, which identified unmet needs in the areas of housing, economy, and infrastructure. ADECA also performed a Mitigation Needs Assessment to inform activities proposed for the mitigation funding requirement.

At least seventy percent (70%) of all program funds will benefit LMI persons or households. As most of the programs submitted in the Action Plan are either limited to benefitting LMI persons or **prioritizing assistance to** LMI persons in accessing programs, the State anticipates meeting the requirement. The State will also be assessing the status of eligible unmet needs of LMI persons and non-LMI persons and determining, at an appropriate stage, whether to request a modification of the requirement.

Unmet Needs and Budget Allocations by Sector					
Sector	Unmet Needs per Sector	% of Unmet Needs	Budget Allocation per Sector		% of Total Budget
Housing	\$ 711,920,934	92%	\$	375,991,456.00	80%
Infrastructure	\$ 13,508,011	2%	\$	68,420,898.00	15%
Economic Development	\$ 44,765,011	6%	\$	22,806,966.00	5%
Total	\$ 770,193,957	100%	\$	467,219,320.00	100%

Table 53: Unmet Needs and Allocations by Sector

The table above shows a breakdown of the unmet needs and budget allocations per sector. The unmet needs for housing accounts for 92% of the total unmet needs and ADECA has allocated 80% of grant funding to housing. Due to the comments ADECA received from county stakeholders regarding the impacts Hurricanes Sally and Zeta had on local infrastructure, the State has allocated additional funding towards infrastructure to address these concerns.

Leveraging Funds.

To maximize the impact of the CDBG-DR funding provided to the State, there will be an ongoing commitment by ADECA to identify and leverage other federal and non-federal funding sources. ADECA understands the importance of leveraging all available funds to maximize the effectiveness of comprehensive recovery efforts and increase its ability to address and mitigate against major disasters.

ADECA will leverage CDBG-DR funds with other funding sources such as FEMA and other state and local funds. ADECA will maximize relationships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of leveraging all viable sources of funding. In addition, to ensure coordination in funding and activities, ADECA will utilize inter-agency partnerships to ensure that information, program updates, and data are shared when necessary.

The CDBG-DR funds will be used to address critical unmet needs that remain after all other sources have been committed and exhausted to prevent any duplication of benefits. The activities identified in this Action Plan were specifically selected as both eligible CDBG-DR activities and filling a gap that other funding sources could not fill. Specific efforts to leverage other funds and programs are as follows:

Housing

ADECA has designed the housing programs in this action plan to cover the gap funding needed by leveraging funds from insurance, FEMA, SBA, private and nonprofit entities, other assistance to complete the repairs from Hurricanes Sally and Zeta. The housing programs may also leverage CDBG-DR funds with funds that include but are not limited to the following programs: Low-Income Housing Tax Credit (LIHTC), HOME, Permanent Supportive Housing, and Continuum of Care.

Economic Development

ADECA will combine funding to address economic development unmet needs from other federal funding sources such as SBA loans, NFIP, non-disaster CDBG funding, USDA, and the U.S. Department of Commerce. Non-federal resources such as local and state economic development public funds, as well as private financing and equity investments, will provide additional leverage to disaster recovery funds.

Infrastructure

ADECA will combine funding to address infrastructure unmet needs from other federal funding sources such as non-disaster CDBG funding, USDA, and FEMA PA and HMGP. Additional non-federal resources such as local and state public funds will provide additional leverage to these disaster recovery funds. By encouraging local governments to use CDBG-DR to cover the required local match for the FEMA programs, communities will be able to maximize both funding sources.

Grant Funding Interchangeability

Public Law 117-43 permits grantees that receive funds appropriated under any prior or future appropriations for activities authorized under title I of the HCDA related to unmet recovery needs, to use grant funds interchangeably for the same activities in overlapping HUD-identified or Grantee-identified Most Impacted and Distressed (MID) areas if the activities address unmet needs of both disasters. ADECA will utilize a portion of the funding appropriated under Public Law 117-43 for Hurricanes Sally and Zeta (B-21-DZ-01-0001) as program administrative costs and activity costs for activities proposed in its 2023 Tornadoes Action Plan for Disaster Recovery (B-23-DG-01-0001) to allow grant funds interchangeability in Dallas County which experienced damage to single family housing in both the 2020 and 2023 disasters. The table below outlines the grant funds ADECA intends to use interchangeably.

Funding Interchangeability [JM1]			
Original Location of Funds	New Location of Funds	Amount of Funding	Type of Costs
Public Law 117-43 (2020 Hurricanes Sally and Zeta) B-21-DZ-01-0001	Public Law 117-328 (2023 Tornadoes) B-23-DG-01-0001	\$1,696,292.00	Program Administrative Costs
Public Law 117-43 (2020 Hurricanes Sally and Zeta) B-21-DZ-01-0001	Public Law 117-328 (2023 Tornadoes) B-23-DG-01-0001	\$2,080,000.00	Activity Costs

Program Partners.

During the implementation of this grant, ADECA may enlist program partners through formal agreements such as subrecipient agreements and interagency agreements and through informal partnerships. If needed, ADECA will engage a broad array of program partners so that programs are accessible and tailored to equitably meet the unmet needs of disaster-impacted residents and communities.

ADECA will ensure that any selected subrecipients have the capacity and expertise to carry out the program activities included in their scope of work. If needed, ADECA may allocate administrative funding, as appropriate, to assist in improving subrecipient capacity by providing technical assistance and training to subrecipients on program requirements, applicable federal and state cross-cutting requirements, and reporting and performance requirements.

The program descriptions include the types of subrecipients or interagency partnerships that may support ADECA in the administration or implementation of specific programs.

Distribution of Funds.

ADECA will implement a hybrid method of distribution (MOD) inclusive of a state-administered housing rehabilitation/reconstruction program, a planning program, a formula allocation to the Hardest Hit MID (HHMID) areas, and competitive allocations for non-HHMID counties.

The MOD described herein will support the recovery of residents and businesses by supporting the critical recovery areas of housing, infrastructure, and economic revitalization, while prioritizing MID areas and LMI households and serving the most vulnerable and hardest to reach populations impacted by the hurricanes. ADECA will continue to update the unmet needs assessment as needed, and through this continued assessment may allocate funds to additional subrecipients.

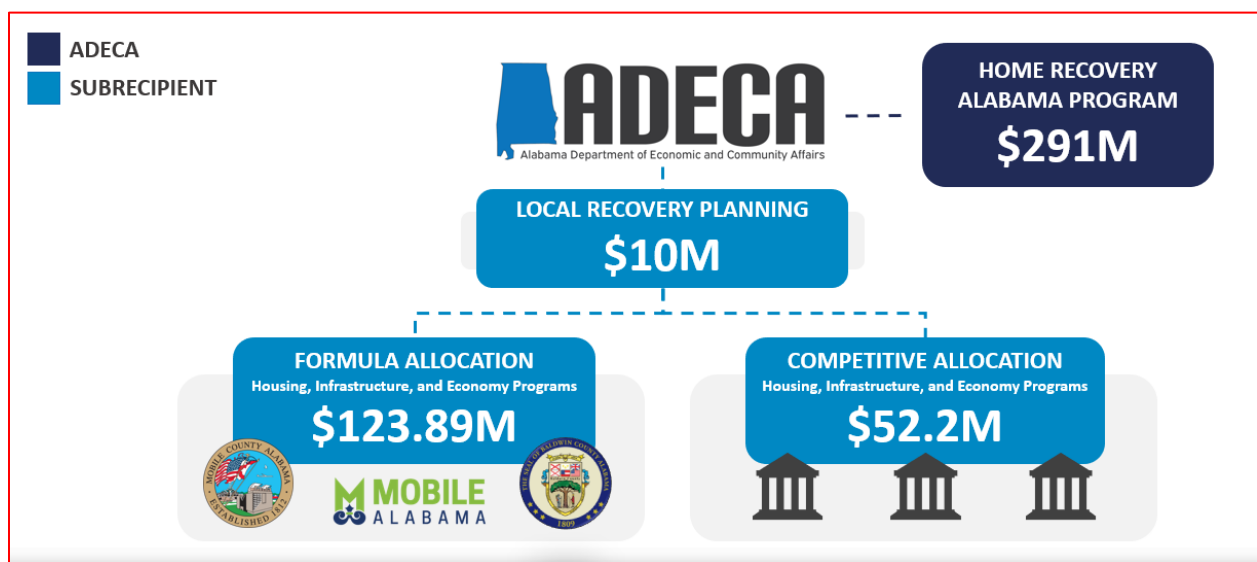


Figure 28: Basic Method of Distribution

Direct Housing Rehabilitation/Reconstruction Program – “Home Recovery Alabama Program” (HRAP) - \$291M

As described in the unmet need analysis, over 90% of all remaining unmet needs are related to housing. Approximately 80% of FEMA IA applications received across impacted areas are for typical single family housing types (house/duplex or mobile home). To address the overwhelming single family housing recovery need, ADECA will allocate 77% of allocated housing funds to a state-administered single-family rehabilitation/reconstruction program

that addresses the unmet needs of impacted households that reside within all MID and State-MID counties. The percent of funding allocated to this single-family housing recovery initiative is proportionate to the percentage of traditional single-family housing applications received by FEMA IA.

The housing program includes activities such as repair, rehabilitation, and reconstruction of owner and renter occupied units; replacement of substantially damaged Manufactured Housing Units; relocation assistance; inclusion of mitigation and resilience measures, and related public services, as needed.

Local Recovery Planning (LRP) - \$10M

ADECA will provide funding to MID counties to develop Local Recovery Plans (LRPs), with the intent of developing plans that describe the intended uses of funds for review and approval by ADECA (formula subrecipients) or a plan that describes the greatest needs and develops a list of projects that may then be submitted during the competition phase (competition subrecipients). All plans must demonstrate extensive local outreach; ensure collaboration with local governments, non-profits, and other stakeholders; and adequately demonstrate the subrecipient's capacity to administer programs or activities described in the plans. The successful development and approval of a LRP is required prior to the implementation of subrecipient recovery activities.

Hardest Hit MID (HHMID) Formula Allocations - \$123.8M

The unmet needs analysis revealed nearly all remaining unmet needs across all sectors are located within Mobile and Baldwin Counties. These two (2) counties account for nearly 93% of all remaining unmet need across all sectors. When considering storm impact in Mobile County, the City of Mobile suffered disproportionate impacts compared to other areas within the County. The City of Mobile accounts for 61.7% of the real property loss verified by FEMA and applicants in City of Mobile account for 71% of all FEMA IA applications submitted in Mobile County. The table below shows all unmet needs in each MID county by recovery category.

	County	Housing	Infrastructure	Economy	Total	% of Overall Unmet Needs
MID	Mobile	\$ 450,072,015	\$ 992,030	\$ 16,512,487	\$ 467,576,533	61%
	Baldwin	\$ 215,105,891	\$ 3,768,226	\$ 23,782,453	\$ 242,656,570	32%
	Escambia	\$ 17,543,416	\$ 347,066	\$ 779,671	\$ 18,670,152	2%
	Clarke	\$ 7,322,268	\$ 1,208,424	\$ 852,838	\$ 9,383,529	1.2%
State MID	Dallas	\$ 8,506,358	\$ 24,242	\$ 1,986,201	\$ 10,516,802	1.4%
	Washington	\$ 5,699,502	\$ 4,250	\$ 814,496	\$ 6,518,248	0.8%
	Wilcox	\$ 3,451,085	\$ 7,499	\$ 12,363	\$ 3,470,946	0.5%
	Marengo	\$ 3,406,713	\$ 161	\$ 24,707	\$ 3,431,581	0%
	Perry	\$ 813,686	\$ 27,745	\$ (204)	\$ 841,227	0.1%
	Statewide	\$ -	\$ 7,128,368	\$ -	\$ 7,128,368	
	Total Unmet Needs	\$ 711,920,934	\$ 13,508,011	\$ 44,765,011	\$ 770,193,957	

Table 54: Unmet Needs Breakdown by Recovery Sector and County

To respond to the needs of these Hardest Hit MID (HHMID) areas and ensure recovery dollars are expended in geographic areas with the highest storm impacts, the State has chosen to allocate funding directly to the HHMID areas, with funding in Mobile County distributed between the City of Mobile and Mobile County. Recovery in HHMIDs will be aided by the Home Recovery Alabama Program (HRAP), which will support the single-family housing recovery in the HHMID areas.

The HHMID areas of the City of Mobile, Baldwin and Mobile Counties will receive funding through a formula allocation, described in detail below.

HHMID Allocation Formula

The State has set-aside direct funding allocations for Baldwin and Mobile counties in the amount of \$123.8 million. Mobile County will receive \$80.5 million, split between Mobile City (\$52 million) and Mobile County excluding Mobile City (\$28 million). Baldwin County will receive \$43 million.

The formula used to calculate the direct allocation of funding to Baldwin and Mobile Counties uses the average of the following factors: Percent of population, Percent of remaining Unmet Needs, and Percent of Medium and High SoVi population. As a result of this formula, 65% of funding has been allocated to Mobile County, and 35% to Baldwin County.

Hardest Hit MID (HHMID) Formula Allocation									
MID Population			MID Total Remaining Unmet Need			MID SoVi Score			Average of Factors
MID	Population	Percent	MID	Remaining Unmet Needs	Percent	MID	High & Med SoVi Population	Percent	
Baldwin County	231,767	36%	Baldwin County	\$ 242,656,570	34%	Baldwin County	129,472	35%	35%
Mobile County	414,809	64%	Mobile County	\$ 467,576,533	66%	Mobile County	245,297	65%	65%
Total	646,576	100%	Total	\$ 710,233,102	100%	Total	374,769	100%	
Source: https://www.census.gov/quickfacts/fact/table/baldwincountyalabama,mobilecountyalabama,AL_US/POP010220			Source: ADECA Unmet Needs Analysis			Source: Social Vulnerability Index (SoVi) - University of Central Florida, Vulnerability Mapping			

Table 55: Hardest Hit MID Formula Allocation

The formula used to calculate the split allocation between Mobile City and Mobile County uses the average of the following factors: Percent of Real Property FEMA Verified Loss (RPFVL) and the Percent of Medium and High SoVi Population. As a result of this formula, Mobile City will receive 65% of the total funding allocation for Mobile County. Mobile County, excluding Mobile City, will receive 35% of the total funding allocation for Mobile County.

Mobile City and County Formula Allocation									
Real Property FEMA Verified Loss (RPFVL)			Medium SoVi Population			High SoVi Population			Average of Factors
MID	RPFVL	Percent	MID	Medium SoVi Pop	Percent	MID	High SoVi Pop	Percent	
Mobile City	\$ 28,603,062	62%	Mobile City	105,160	62%	Mobile City	53,832	72%	65%
Mobile County	\$ 17,775,085	38%	Mobile County	65,510	38%	Mobile County	20,795	28%	35%
Total	\$ 46,378,147	100%	Total	170,670	100%	Total	74,627	100%	
Source: FEMA Individual Assistance - Open Source Data			Source: Social Vulnerability Index (SoVi) - University of Central Florida, Vulnerability Mapping			Source: Social Vulnerability Index (SoVi) - University of Central Florida, Vulnerability Mapping			

Table 56: Mobile City and County Formula Allocation

Based on the formula calculation, Mobile County, Mobile City, and Baldwin County will receive:

- Mobile County, excluding Mobile City, will receive \$15.6 million for infrastructure and economic development, and \$12.4 million for housing.
- Mobile City will receive \$29.1 million for infrastructure and economic development, and \$23.2 million for housing.
- Baldwin County will receive \$24.1 million for infrastructure and economic development, and \$19.2 million for housing.

These allocations will be available for a wide range of eligible activities to address unmet housing, infrastructure, economic development, mitigation, and other eligible unmet needs, as described in each subrecipient's Local Recovery Plan. HHMID subrecipients must align local recovery budgets by recovery category with unmet needs described in this Action Plan, unless a Local Recovery Plan proposes an alternative unmet needs analysis and budget allocation that is adequately supported by the best available local data.

Examples of eligible activities include, but are not limited to, affordable multifamily rental housing, first-time homebuyer assistance, voluntary buyout, rental assistance, construction or rehabilitation of storm water management systems, resilience measures for critical

facilities, public facility improvements, and workforce training and development. Single-family rehabilitation activities will be ineligible.

HHMID	Housing	Non-Housing	Total
City of Mobile	\$23,200,090	\$29,143,659	\$52,343,749
Mobile County	\$12,492,356	\$15,692,740	\$28,185,096
Baldwin County	\$19,219,010	\$24,142,676	\$43,361,686
Total	\$54,911,456	\$68,979,075	\$123,890,531

Table 57: Formula allocations to HHMID areas

MID Competitive Allocations - \$52.2M

All MID counties outside the HHMID areas will be eligible to submit projects and/or activities through a competitive process. There will be two competitive processes, one for housing activities and one for non-housing activities. Although the remaining unmet needs in the remaining MID areas (Clarke and Escambia) and the State-designated MIDs (Dallas, Washington, Wilcox, Marengo, and Perry) accounts for approximately 7 percent of the total unmet needs, the State determined that this proportion of grant funds was not sufficient to adequately address the need through these areas. Therefore, the State designated 10 percent of grant funds to address the disaster recovery and mitigation needs in these communities.

Housing - \$30M

This competition will seek to achieve the goals of improving/increasing the local affordable housing stock, improving housing security, and enabling households to move out of harm’s way. The housing competition will allow for the submission and selection of CDBG-DR eligible activities such as affordable multifamily rental housing, first-time home buyer assistance, and voluntary buyout. Single-family rehabilitation and reconstruction will not be eligible.

Non-Housing \$22.2M

This competition will seek to achieve the goals of improving critical infrastructure, assisting in the recovery of commercial areas, providing critical public services, and increasing resilience for future disasters. Eligible activities under the non-housing competition may include, but are not limited to, flood control and drainage repair and improvements, resilience measures for critical facilities, public facility improvements, workforce training and development, façade improvements, housing counseling, and assistance to small businesses through grants or physical improvements.

Budgets for competitive allocations are split by recovery sector, with separate competitive allocations available to address unmet housing, and eligible non-housing needs in impacted communities. The table below outlines the funding distribution for competitive allocations, by recovery sector.

Recovery Sector	Budget
Housing	\$30,000,000
Non-housing	\$22,248,789
Total	\$52,248,789

Table 58: Competitive Allocation Budget by Recovery Sector

Program Income.

ADECA understands that when implementing certain activities with CDBG-DR funds there is the potential for generating program income. In the event a program involves program income, ADECA shall develop and adopt specific policies and procedures and will specify in those policies whether program income may be retained by local governments, if applicable. These amounts will be recorded and tracked in the State accounting systems and recorded in the DRGR system. Up to five percent (5%) of the program income generated by CDBG-DR funds may be used for administrative costs by ADECA, units of local government, or other subrecipients.

Unless otherwise specified in the program guidelines or delineated in subrecipient agreements, all program income shall be remitted to the State. To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Department of the Treasury are made. Grant funds are not allowed to be drawn until all program income has been expended. Program income will be treated as additional CDBG-DR funds subject to the requirements of the applicable Federal Register Notice and must use it in accordance with the disaster recovery action plan.

Subrecipients will be required to report program income quarterly and will be subject to applicable rules, regulations, and HUD guidance.

If any program income remains at program closeout, the Department may return these funds to HUD or transfer the balance to the State's annual CDBG program, as allowable per HUD.

Resale or Recapture.

A CDBG-DR award recipient may be required to repay all, or a portion of the funds received. The reasons for recapture include, but are not limited to, the following:

- An applicant is determined to have provided false or misleading information to ADECA or its subrecipient,
- An applicant withdraws from the program prior to completion of the project,
- An applicant does not complete construction,
- An applicant does not report the receipt of additional insurance, SBA, FEMA, non-profit assistance, and/or
- Any other DOB received after calculation of the award, and / or
- An applicant voluntarily or involuntarily relinquishes ownership of the property prior to the successful completion of a final program inspection.

ADECA shall establish resale or recapture requirements for 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, 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.

Obligations and means of enforcement for non-housing programs will vary depending on the nature of the grantee (i.e., public, or private entity), purpose, and amount of funds; all of which are subject to federal and state laws, regulations, and terms and conditions associated with the grant.

To address any potential future DOB, applicant beneficiaries must, as a requirement for participating in the CDBG-DR program, agree to enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, after an award is issued, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

Pre-Agreement Costs

ADECA may seek reimbursement for pre-agreement costs after the effective date of the grant agreement. Pre-agreement costs could include the costs for salaries, benefits, and direct operating expenses of ADECA that were used for the planning of the CDBG-DR programs. Other pre-agreement costs could include activity delivery and projects costs associated with eligible disaster recovery programs identified within this Action Plan.

Moreover, the State may request reimbursement for certain eligible pre-award costs necessary for the efficient and timely implementation of its recovery programs. These costs may include environmental review, damage assessment and other costs necessary for determining eligibility of housing related projects. The State will also work with non-governmental entities working to fund housing recovery through short term, private and philanthropic loan funds intended to jump start critical housing recovery programs for at risk populations.

Outreach and Engagement

ADECA followed HUD's guidance on facilitating equitable engagement, by engaging with community partners, including them in the decision-making, and changing Action Plan program design based on their input.

As outlined in the Outreach and Engagement section of this Action Plan, the State reached out to numerous stakeholders in the impacted areas, including local governments, state agencies, the MOWA Choctaw Indians, non-governmental organizations, and public housing

authorities, among other entities, to solicit feedback and inform the disaster recovery programs summarized in this action plan.

Additionally, ADECA held two public hearings on September 12 and 13, 2022 in Baldwin and Mobile counties (both HUD-identified MID areas), respectively, as well as an all-day listening session with community partners in Mobile (City) August 10, 2022, to inform the Action Plan, as well as the types of recovery programs ADECA should seek to implement.

To further ADECA’s practice of equitable engagement, ADECA is allocating planning funds to eligible jurisdictions to engage in the community planning process to engage, more locally, communities and vulnerable populations to inform its recovery and mitigation unmet needs and identify projects that will equitably benefit those communities. In order for jurisdictions to administer programs through the direct allocation of funds or the housing, infrastructure and economic development competitions, jurisdictions will be required to have completed, submitted, and have an ADECA-approved Local Recovery Plan.

b. Program Details.

The State of Alabama’s Community Development Block Grant – Disaster Recovery (CDBG-DR) funding will be allocated as shown on the preceding pages and as described below. The allocation awards will be announced on ADECA’s website and through distributed public notifications.

For a more detailed narrative of the considerations taken for method of distribution, see Distribution of Funds section above.

Home Recovery Alabama Program (HRAP)

Home Recovery Alabama Program (HRAP)		
Program Budget	Administering Entity	National Objective
\$291,080,000	ADECA	LMI
Maximum Award	Start – End Date	Eligible Area
\$350,000	Duration of the Grant	Mobile, Clarke, Escambia, Baldwin, Dallas, Marengo, Perry, Wilcox, and Washington Counties

- Exceptions to the maximum award caps may be made on a case-by-case basis. These exceptions may include but are not limited to additional funding necessary to comply with federal accessibility standards or reasonable accommodation for persons with disabilities. Any exceptions will be provided in accordance with the State's adopted exceptions policy.

HURRICANE IMPACT

The impacts of Hurricane's Sally and Zeta on homes in the impacted areas are estimated to be nearly \$750 million. The housing stock suffered damage from flooding, rain, and wind, impacting homes from the ground up, leaving homes severely damaged, families living in substandard or unsafe conditions or even displacing them from their communities. These storm impacts affected both Owner-Occupied housing, and Rental-Occupied housing.

ELIGIBLE ACTIVITIES

Section 105(a)(1), 105(a)(3), 105(a)(4), 105(a)(8), 105(a)(11), 105(a)(18), 105(a)(25)

- Single-family owner-occupied rehabilitation, reconstruction, or new construction
- Repair and replacement of manufactured housing units
- Hazard mitigation
- Elevation
- Relocation assistance
- Demolition only
- Public service (e.g., housing counseling, legal counseling, job training, mental health, general health, etc. (fifteen percent (15%) cap))
- Administrative activities associated with recovery of single-family housing stock

PROGRAM PRIORITIES

Applications for owner-occupied households will be prioritized based on specific income and vulnerability factors, as follows:

1. LMI (80% AMI and below) and
 1. Age-dependent household member(s) AND
 2. Household member(s) with a documented disability
2. LMI (80% AMI and below) and
 1. Age-dependent household member(s) OR
 2. Household member(s) with a documented disability
3. LMI (80% AMI and below)

For the purposes of program priorities, age-dependent households are defined as households including members greater than or equal to 65 years old and/or less than or equal to 17 years old.

ELIGIBILITY

The Home Recovery Alabama Program (HRAP) will offer pathways to assist both owner-occupied and rental housing units. Eligibility criteria for owner or renter pathways will be slightly different. Both are described below.

Owner-Occupied Housing Units

- The owner must have owned the home at the time of the qualifying disaster and at time of application. If the property is part of a multi-unit structure, such as a duplex, the applicant must own the entire structure
- The owner must have occupied the home as their primary residence at the time of qualifying disaster
- The home must be in a HUD- or State-identified MID area
- The home must have unrepaired damaged as a result of the qualifying disaster
- The structure must be a single-family dwelling, such as a stick-built, modular, or mobile home
- Property taxes current and mortgage (if applicable) must be in good standing

Rental Property Applicants

Property owners do not have to reside in the state at the time of application to be eligible for program funding.

Rental property and applicants must meet all criteria listed below to be eligible for program funding:

- Applicant must not be in bankruptcy or active foreclosure.
- Property taxes current and mortgage (if applicable) in good standing.
- Applicant must have owned the property at the time of the storm and at the time of application. If the property is part of a multi-unit structure, such as a duplex, the applicant must own the entire structure.
- The home must be in a HUD- or State-identified MID area.
- The home must have unrepaired damaged as a result of the qualifying disaster.
- Property must be an eligible structure type; such as a stick-built, modular, or mobile home.
- Property must not be located in a FEMA-designated 100-year floodplain.
- Property must be unoccupied at the time of application.

- At least fifty-one percent (51%) of units must be occupied by certified LMI households if awarded program funds.

METHOD OF DISTRIBUTION

ADECA will administer the Home Recovery Alabama Program directly. Units of local government may partner with ADECA to support outreach activities within their jurisdiction.

PROGRAM OBJECTIVE & DESCRIPTION

To assist the most vulnerable and impacted households, the State will directly implement the **Home Recovery Alabama Program (HRAP)** to meet the housing needs identified in the unmet needs assessment. This housing program may include:

1. Repair, Rehabilitation and Reconstruction of existing Owner- and Renter-Occupied housing units,
2. Replacement of storm-damaged Manufactured Housing Units (MHU),
3. Inclusion of needed and appropriate mitigation and resilience measures, including but not limited to elevation, roof reinforcement, or floodproofing.

The State of Alabama will require construction methods, standards, and materials that are quality, durable, energy efficient, sustainable, and mold resistant. All rehabilitation, reconstruction, and new construction will meet all applicable state and local building codes, in addition to any minimum construction standards required under the Federal Notice (87 FR 31647). For instance, for all reconstruction, new construction or substantially improved structures, the State of Alabama will require new construction to meet a Green Building certification standard.

For any non-substantially damaged or improved structures, the State of Alabama will use HUD's CPD Green Building Guidelines and apply them to rehabilitation work to include the use of mold resilient products. Additionally, if older or obsolete products are replaced due to rehabilitation work, the State of Alabama will use products and appliances designated ENERGY STAR, WaterSense or Federal Energy Management Program (FEMP).

All housing activities will be required to, at a minimum, meet applicable and current HUD Housing Quality Standards (HQS). The State of Alabama will define "not suitable for rehabilitation" in the program guidelines.

Hazard mitigation and long-term resilience is a priority for the program; therefore, it may fund any necessary and appropriate mitigative, or resilience measure to that end. In addition to funding physical resilience measures, the program may provide assistance to eligible applicants for the initial purchase of required flood insurance coverage of the property for a duration up to the required occupancy period. Through this type of assistance, the homeowner will remain compliant with Federal flood insurance requirements during the initial occupancy period and provide necessary protection to the property for future disasters. During the period, it is expected that the homeowner will assume responsibility of the flood insurance premium to remain compliant after the initial term.

The State of Alabama will not distribute funds directly to eligible applicants. The intent of the program is to repair or replace damaged housing stock throughout the impacted areas. To that end, the State will directly manage all construction activities funded by this CDBG-DR allocation through the State procured construction contractor(s).

The primary objective of the program is the provision of decent, safe, and sanitary housing in the areas impacted by the disasters. The program is designed to ensure that the housing needs of extremely-low, very-low, low- and moderate-income households, protected classes, and vulnerable populations, including individuals that were made homeless as a result of the disasters, are addressed to the greatest extent feasible, including preventing these populations from experiencing homelessness. The program will address disaster-related damages, unrelated improvements to bring properties up to HUD Housing Quality Standards (HQS), if needed, and may mitigate potential future damage.

The program will provide grant funding to eligible homeowners and rental property owners in impacted areas to repair, reconstruct, or replace their storm-damaged property in place. Eligible property types may include stick-built homes, mobile home units (MHU), modular homes, and other single-family residence types. Grant funds will be used to pay for the cost of construction activities directly to program-selected general contractors. Applicants with ownership interest in a property who cannot supply the acceptable ownership documents as outlined in the program guidelines due to heirship or probate issues may be referred to Legal Services Alabama for assistance to clear title defects related to probate and/or heirship. No funds will be distributed directly to homeowners.

AFFORDABILITY COMPLIANCE PERIOD AND AFFORDABLE RENTS

All assisted small rental properties (1-4 units) must be restricted to lease only to low- and moderate- income households (those households that do not exceed 80% of the Area Median Income (AMI)) at affordable rent rates during the affordability period of five years. **Affordable rents are rents that do not exceed the High HOME Rent Limits adjusted for the number of bedrooms in the unit, and location of the property.**

For all assisted owner-occupied units, the applicant must agree to own and occupy the assisted property for 3 years after completion. Exceptions may be made for extenuating circumstances on a case-by-case basis as determined by ADECA.

Home Recovery Alabama Program (HRAP)

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-21-DZ-01-0001	\$291,080,000.00	\$277,080,000.00	\$14,000,000.00

Narratives

- Program Description

To assist the most vulnerable and impacted households, the State will directly implement the **Home Recovery Alabama Program (HRAP)** to meet the housing needs identified in the unmet needs assessment. This housing program may include:

1. Repair, Rehabilitation and Reconstruction of existing Owner- and Renter- Occupied housing units,
2. Replacement of storm-damaged Manufactured Housing Units (MHU),
3. Inclusion of needed and appropriate mitigation and resilience measures, including but not limited to elevation, roof reinforcement, or floodproofing.

The State of Alabama will require construction methods, standards, and materials that are quality, durable, energy efficient, sustainable, and mold resistant. All rehabilitation, reconstruction, and new construction will meet all applicable state and local building codes, in addition to any minimum construction standards required under the Federal Notice (87 FR 31647). For instance, for all reconstruction, new construction or substantially improved structures, the State of Alabama will require new construction to meet a Green Building certification standard.

For any non-substantially damaged or improved structures, the State of Alabama will use HUD's CPD Green Building Guidelines and apply them to rehabilitation work to include the use of mold resilient products. Additionally, if older or obsolete products are replaced due to rehabilitation work, the State of Alabama will use products and appliances designated ENERGY STAR, WaterSense or Federal Energy Management Program (FEMP).

All housing activities will be required to, at a minimum, meet applicable and current HUD Housing Quality Standards (HQS). The State of Alabama will define "not suitable for rehabilitation" in the program guidelines.

Hazard mitigation and long-term resilience is a priority for the program; therefore, it may fund any necessary and appropriate mitigative, or resilience measure to that end. In addition to funding physical resilience measures, the program may provide assistance to eligible applicants for the initial purchase of required flood insurance coverage of the property for a duration up to the required occupancy period. Through this type of assistance, the homeowner will remain compliant with Federal flood insurance requirements during the initial occupancy period and provide necessary protection to the property for future disasters. During the period, it is expected that the homeowner will assume responsibility of the flood insurance premium to remain compliant after the initial term.

The State of Alabama will not distribute funds directly to eligible applicants. The intent of the program is to repair or replace damaged housing stock throughout the impacted areas. To that end, the State will directly manage all construction activities funded by this CDBG-DR allocation through the State procured construction contractor(s).

The primary objective of the program is the provision of decent, safe, and sanitary housing in the areas impacted by the disasters. The program is designed to ensure that the housing needs of extremely-low, very-low, low- and moderate-income households, protected classes, and vulnerable populations, including individuals that were made homeless as a result of the disasters, are addressed to the greatest extent feasible, including preventing these populations from experiencing homelessness. The program will address disaster-related damages, unrelated improvements to bring properties up to HUD Housing Quality Standards (HQS), if needed, and may mitigate potential future damage.

The program will provide grant funding to eligible homeowners and rental property owners in impacted areas to repair, reconstruct, or replace their storm-damaged property in place. Eligible property types may include stick-built homes, mobile home units (MHU), modular homes, and other single-family residence types. Grant funds will be used to pay for the cost of construction activities directly to program-selected general contractors. Applicants with ownership interest in a property who cannot supply the acceptable ownership documents as outlined in the program guidelines due to heirship or probate issues may be referred to Legal Services Alabama for assistance to clear title defects related to probate and/or heirship. No funds will be distributed directly to homeowners.

- **Program Tieback to Disaster/Unmet Needs**

The impacts of Hurricane's Sally and Zeta on homes in the impacted areas are estimated to be nearly \$750 million. The housing stock suffered damage from flooding, rain, and wind, impacting homes from the ground up, leaving homes severely damaged, families living in substandard or unsafe conditions or even displacing them from their communities. These storm impacts affected both Owner-Occupied housing, and Rental-Occupied housing.

- **How Program will Promote Housing for Vulnerable Populations**

Applications for owner-occupied households will be prioritized based on specific income and vulnerability factors, as follows:

1. LMI (80% AMI or less) and
 1. Age-dependent household member(s) AND
 2. Household member(s) with a documented disability
2. LMI (80% AMI or less) and
 1. Age-dependent household member(s) OR
 2. Household member(s) with a documented disability
3. LMI (80% AMI and below)

For the purposes of program priorities, age-dependent households are defined as households including members greater than or equal to 65 years old and/or less than or equal to 17 years old.

- **Program Affordability Period (if applicable)**

All assisted small rental properties (1-4 units) must be restricted to lease only to low- and moderate- income households (those households that do not exceed 80% of the Area Median Income (AMI)) at affordable rent rates during the affordability period of five years. **Affordable rents are rents that do not exceed the High HOME Rent Limits adjusted for the number of bedrooms in the unit, and location of the property.**

For all assisted owner-occupied units, the applicant must agree to own and occupy the assisted property for 3 years after completion. Exceptions may be made for extenuating circumstances on a case-by-case basis as determined by ADECA.

- **Program Definition of Second Home/Eligibility**

Second homes are not eligible at this time.

- **Program National Objective(s)**

LMI

- **Program Eligibility**

Eligible Areas:

1. Mobile, Clarke, Escambia, Baldwin, Dallas, Marengo, Perry, Wilcox, and Washington Counties

Eligible Activities:

Section 105(a)(1), 105(a)(3), 105(a)(4), 105(a)(8), 105(a)(11), 105(a)(18), 105(a)(25)

2. Single-family owner-occupied rehabilitation, reconstruction, or new construction
3. Repair and replacement of manufactured housing units
4. Hazard mitigation
5. Elevation
6. Relocation assistance
7. Demolition only
8. Public service (e.g., housing counseling, legal counseling, job training, mental health, general health, etc. (fifteen percent (15%) cap))
9. Administrative activities associated with recovery of single-family housing stock

Eligibility Criteria:

The Home Recovery Alabama Program (HRAP) will offer pathways to assist both owner-occupied and rental housing units. Eligibility criteria for owner or renter pathways will be slightly different. Both are described below.

Owner-Occupied Housing Units:

10. The owner must have owned the home at the time of the qualifying disaster and at time of application
11. The owner must have occupied the home as their primary residence at the time of qualifying disaster
12. The home must be in a HUD- or State-identified MID area
13. The home must have unrepaired damaged as a result of the qualifying disaster
14. The structure must be a single-family dwelling, such as a stick-built, modular, or mobile home.
15. Property taxes current and mortgage (if applicable) must be in good standing

Rental Property Applicants:

Property owners do not have to reside in the state at the time of application to be eligible for program funding.

Rental property and applicants must meet all criteria listed below to be eligible for program funding:

- Applicant must not be in bankruptcy or active foreclosure.
 - Property taxes current and mortgage (if applicable) in good standing.
 - Applicant must have owned the property at the time of the storm and at the time of application. If the property is part of a multi-unit structure, such as a duplex, the applicant must own the entire structure.
 - The home must be in a HUD- or State-identified MID area.
 - The home must have unrepaired damaged as a result of the qualifying disaster.
 - Property must be an eligible structure type; such as a stick-built, modular, or mobile home.
 - Property must not be located in a FEMA-designated 100-year floodplain.
 - Property must be unoccupied at the time of application.
 - At least fifty-one percent (51%) of units must be occupied by certified LMI households if awarded program funds.
-
- **Program Responsible Entity**

Alabama Department of Economic and Community Affairs (ADECA)

- **Program Maximum Assistance**
 1. \$350,000
 2. Exceptions to the maximum award caps may be made on a case-by-case basis. These exceptions may include but are not limited to additional funding necessary to comply with federal accessibility standards or reasonable accommodation for persons with disabilities. Any exceptions will be provided in accordance with the State’s adopted exceptions policy.
- **Program Estimated Begin and End Dates**
 1. “Duration of the Grant”
 2. March 2023 – March 2027
- **Other Program Details**
- **Program Competitive Application Overview (if applicable)**

NA

- **Program Method of Distribution Description/Overview (if applicable)**

ADECA will administer the Home Recovery Alabama Program directly. Units of local government may partner with ADECA to support outreach activities within their jurisdiction.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**
- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

Projection of Expenditures

Period	Quarterly Projection of Expenditures	Quarterly Actual of Expenditures	Cumulative Projection of Expenditures	Cumulative Actual of Expenditures
04/01/2023	\$5,500,000.00		\$5,500,000.00	\$204,480.57
07/01/2023	\$15,000,000.00		\$20,500,000.00	\$204,480.57
10/01/2023	\$25,000,000.00		\$45,500,000.00	\$204,480.57
01/01/2024	\$35,000,000.00		\$80,500,000.00	\$204,480.57
04/01/2024	\$45,000,000.00		\$125,500,000.00	\$204,480.57
07/01/2024	\$50,000,000.00		\$175,500,000.00	\$204,480.57
10/01/2024	\$25,000,000.00		\$200,500,000.00	\$204,480.57
01/01/2025	\$20,000,000.00		\$220,500,000.00	\$204,480.57
04/01/2025	\$15,000,000.00		\$235,500,000.00	\$204,480.57
07/01/2025	\$12,500,000.00		\$248,000,000.00	\$204,480.57
10/01/2025	\$10,000,000.00		\$258,000,000.00	\$204,480.57
01/01/2026	\$10,500,000.00		\$268,500,000.00	\$204,480.57
04/01/2026	\$5,000,000.00		\$273,500,000.00	\$204,480.57

Period	Quarterly Projection of Expenditures	Quarterly Actual of Expenditures	Cumulative Projection of Expenditures	Cumulative Actual of Expenditures
07/01/2026	\$1,500,000.00		\$275,000,000.00	\$204,480.57
10/01/2026	\$1,000,000.00		\$276,000,000.00	\$204,480.57
01/01/2027	\$1,000,000.00		\$277,000,000.00	\$204,480.57
04/01/2027	\$1,000,000.00		\$278,000,000.00	\$204,480.57
07/01/2027	\$1,000,000.00		\$279,000,000.00	\$204,480.57
10/01/2027	\$1,000,000.00		\$280,000,000.00	\$204,480.57
01/01/2028	\$0.00		\$280,000,000.00	\$204,480.57
04/01/2028	\$0.00		\$280,000,000.00	\$204,480.57

Projection of Outcomes

Period	Performance Measure	Quarterly Projection of Outcomes	Quarterly Actual of Outcomes	Cumulative Projection of Outcomes	Cumulative Actual of Outcomes
04/01/2023	# of Properties	0	0	0	0
07/01/2023	# of Properties	0	0	0	0
10/01/2023	# of Properties	0	0	0	0
01/01/2024	# of Properties	24	0	24	0
04/01/2024	# of Properties	67	0	91	0
07/01/2024	# of Properties	111	0	202	0
10/01/2024	# of Properties	156	0	358	0
01/01/2025	# of Properties	200	0	558	0
04/01/2025	# of Properties	222	0	780	0
07/01/2025	# of Properties	111	0	891	0
10/01/2025	# of Properties	89	0	980	0
01/01/2026	# of Properties	67	0	1,047	0
04/01/2026	# of Properties	56	0	1,103	0
07/01/2026	# of Properties	44	0	1,147	0
10/01/2026	# of Properties	47	0	1,194	0
01/01/2027	# of Properties	22	0	1,216	0
04/01/2027	# of Properties	7	0	1,223	0
07/01/2027	# of Properties	5	0	1,228	0
10/01/2027	# of Properties	5	0	1,233	0
01/01/2028	# of Properties	5	0	1,238	0
04/01/2028	# of Properties	5	0	1,243	0

Local Recovery Housing Competition

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-21-DZ-01-0001	\$30,000,000.00	\$0.00	\$30,000,000.00

Narratives

- **Program Description**

Local Recovery Housing Competition

In order to maximize the funding opportunities for housing recovery located outside of Mobile and Baldwin Counties not served by ADECA-implemented Home Recovery Alabama Program, the State of Alabama will implement a \$30 million-dollar competitive program to fund high-impact housing projects. Selected projects will maximize benefits to the community by providing funding for needed affordable housing projects, reducing area blight through housing redevelopment, preventing low-income individuals and families from experiencing homelessness, elevation and other mitigative measures. Other activities deemed necessary by local governments to meet the housing needs identified in the unmet needs assessment may also be eligible for funding under the housing competition.

Eligible applicants will be invited to submit applications for priority projects upon approval of their LRP. Submissions will be evaluated on several criteria including, but limited to, project beneficiaries, readiness, cost-benefit, mitigative aspects, service area demographics, and leveraging of other funding, among others as described in the program guidelines and grant application. A competitive process will ensure that implemented projects have high impacts and maximize the effects of the limited amount of CDBG-DR funding.

In order to enhance program participation and the geographic reach of these recovery funds, the Program may limit project/program submissions per applicant (whether applying individually or in partnership with another entity). This approach may increase the spread of CDBG-DR funding across the eligible area. Prior to opening the competitive application window, ADECA may send an announcement through its mailing list describing the details of this program as well as an announcement on the Department's disaster recovery website.

- **Program Tieback to Disaster/Unmet Needs**

Programs and/or projects must either have a demonstrable tie-back to the impacts from Hurricanes Sally and/or Zeta and address an unmet need or implement projects that mitigate activities that increase resilience to disasters and reduce 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 Program will Promote Housing for Vulnerable Populations**

Competition criteria include projects that serve:

- Vulnerable populations, protected classes, hard-to-reach populations
 - Underserved communities
 - Areas that were economically distressed prior to the disasters
- **Program Affordability Period (if applicable)**

If eligible activities result in the new construction of affordable rental housing of five or more units, CDBG-DR assisted units must be rented to low- and moderate-income households with incomes that do not exceed 80% area median income.

Additionally, ADECA defines affordable rent not to exceed the High HOME Rents for the area and unit size .