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Hurricane Harvey – Round 1
Councils of Governments Method of Distribution Guidelines

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I. Introduction

Through the State of Texas Plan for Disaster Recovery: Hurricane Harvey Round 1 (Action Plan), the GLO allocated funds for local residential buyout/acquisition and local infrastructure programs. Allocations to local governments and entities for the local residential buyout/acquisition and local infrastructure programs will be made through Methods of Distribution (MODs) developed by each respective Council of Governments (COG).

Each impacted COG has been allocated funds in the Action Plan for the two programs. Each COG will develop a local MOD to allocate these funds to local units of government and entities. The city of Houston, Harris County, wholly local governments located within Harris County and entities wholly located within wholly Harris County are ineligible to receive an allocation through the local residential buyout/acquisition and local infrastructure program MODs.

The local buyout and acquisition program will remove homes from harm's way. Due to the nature of this activity, this program will be administered by local units of government and entities with the power of eminent domain authority.

The local infrastructure program will provide disaster relief, long-term recovery, and restoration of infrastructure for local communities impacted by Hurricane Harvey. Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing.

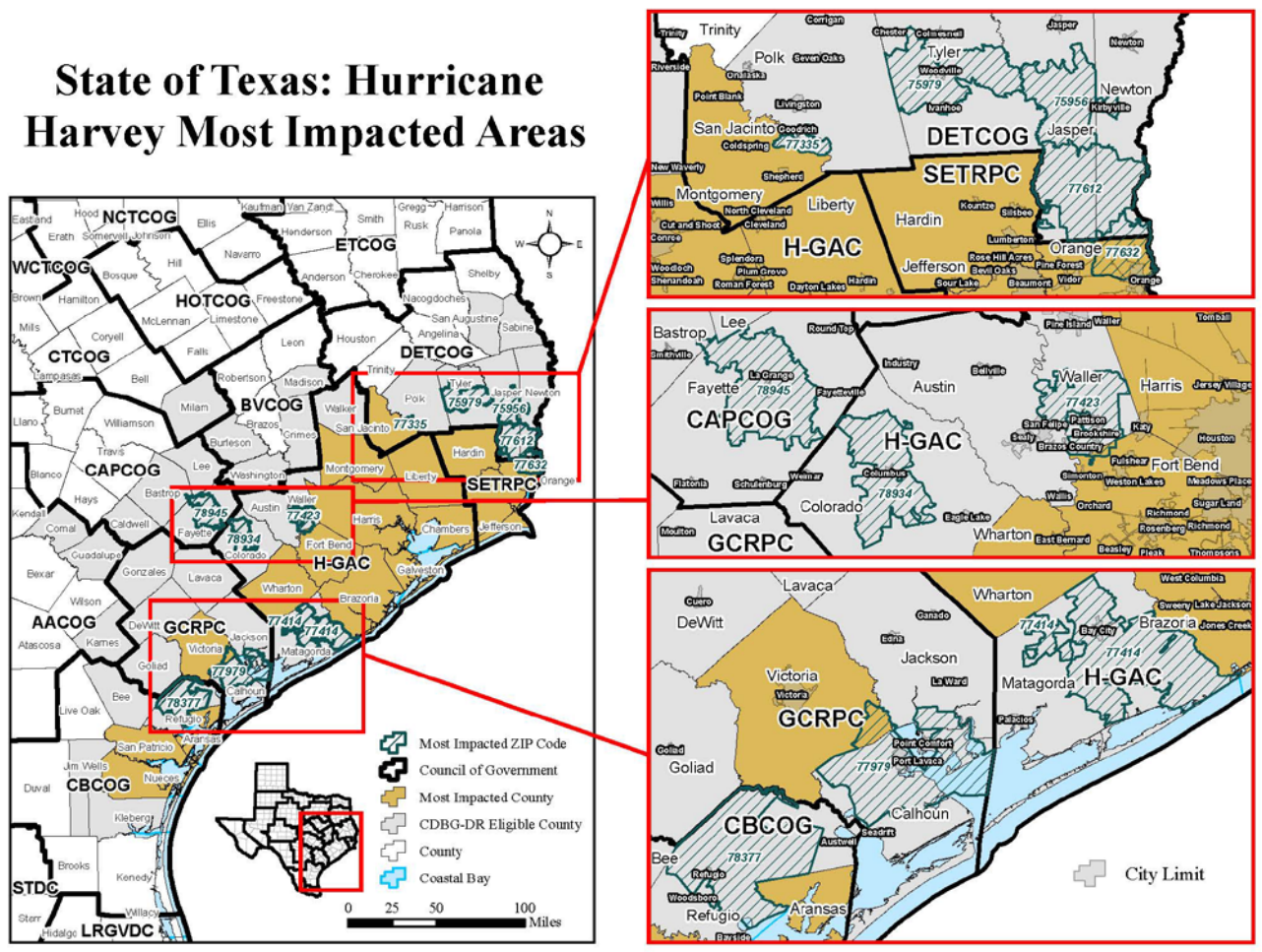
As required by the Federal Register, Vol. 83, No. 28, February 9, 2018, the GLO allocated 80 percent of the funds to address unmet needs within the following HUD identified "most impacted and distressed" areas:

Aransas, Brazoria, Chambers, Fort Bend, Galveston, Hardin, Harris, Jefferson, Liberty, Montgomery, Nueces, Orange, San Jacinto, San Patricio, Victoria, Wharton Counties; 75956, 75979, 77335, 77414, 77423, 77612, 77632, 77979, 78377, 78934 and 78945 ZIP Codes

The remaining 20 percent of the allocation was allocated to address unmet disaster needs in those counties that received a Hurricane Harvey presidential major disaster declaration (DR-4332).

Each COG with a county that has a Hurricane Harvey presidential major disaster declaration (DR-4332) will develop and submit to the GLO a local residential buyout/acquisition MOD and a local infrastructure program MOD.

Figure 1. DR-4332 49 CDBG-DR Eligible Counties and HUD’s Most Impacted Counties and ZIP Codes



The amount each COG was allocated for the local buyout/acquisition program and the local infrastructure program was calculated using unmet needs calculations using U.S. Census Bureau data, FEMA Individual Assistance data, FEMA Public Assistance data, the Social Vulnerability Index (SoVI), and the impact of Hurricane Harvey (per capita unmet need). These factors were analyzed and developed into a formula in the distribution of funds.

The tables below identify the amounts each COG was allocated in the Action Plan. The tables outline the budgets for HUD identified most-impacted and distressed counties and/or ZIP codes, the remaining impacted counties, and the amounts that must serve the low and moderate income (LMI) populations. For the local infrastructure program for the HUD identified most-impacted and distressed areas column, the amount does not include the ZIP codes, only the counties.

Table 1: Local Buyout and Acquisition Program

Region	Most-Impacted Areas (80%)	Impacted Areas (20%)	LMI Amount (70% of Total)	Total Allocation
AACOG	\$0	\$4,152,165	\$2,906,515	\$4,152,165
BVCOG	\$0	\$5,840,778	\$4,088,545	\$5,840,778
CAPCOG	\$6,347,500	\$6,581,974	\$9,050,632	\$12,929,474
CBCOG	\$27,437,060	\$6,938,635	\$24,062,987	\$34,375,695
CTCOG	\$0	\$1,384,055	\$968,838	\$1,384,055
DETCOG	\$25,728,769	\$10,138,263	\$25,106,922	\$35,867,032
GCRPC	\$8,606,577	\$9,824,070	\$12,901,453	\$18,430,647
HGAC	\$100,689,194	\$10,264,238	\$77,667,402	\$110,953,432
SETRPC	\$51,687,614	\$0	\$36,181,330	\$51,687,614
Total	\$ 220,496,714	\$ 55,124,178	\$ 192,934,624	\$ 275,620,892

Table 2: Local Infrastructure Program

Region	Most-Impacted Areas (80%)	Impacted Areas (20%)	LMI Amount (70% of Total)	Total Allocation
AACOG	\$0	\$1,530,000	\$ 1,071,000	\$1,530,000
BVCOG	\$0	\$3,007,825	\$2,105,477	\$3,007,825
CAPCOG	\$0	\$4,305,474	\$3,013,832	\$4,305,474
CBCOG	\$107,994,372	\$17,809,866	\$88,062,967	\$125,804,238
CTCOG	\$0	\$510,000	\$357,000	\$510,000
DETCOG	\$1,214,779	\$6,249,445	\$5,224,957	\$7,464,224
GCRPC	\$18,426,069	\$17,618,520	\$25,231,212	\$36,044,589
HGAC	\$98,096,629	\$31,655,138	\$90,826,237	\$129,751,767
SETRPC	\$105,013,221	\$0	\$73,509,255	\$105,013,221
Total	\$330,745,070	\$82,686,268	\$89,401,937	\$413,431,338

II. Methods of Distribution

Each COG, through a public process, will develop the MOD for the local buyout and acquisition program and the local infrastructure program using objective criteria.

The proposed steps for the development of the MODs and projects is the following:

1. GLO submits State Action Plan to HUD for approval
2. GLO MOD training for COGs
3. COGs submit citizen participation plan to GLO
4. COGs conduct “Public Planning Meeting” public hearing
5. COGs draft MOD
6. COGs post draft MOD for public comment for 14 calendar days and conduct second public hearing
7. Submission of MODs for GLO review and approval (MODs are to be submitted 60 days after GLO submit the Action Plan to HUD for approval)
8. GLO reviews and approves MODs (GLO official approval of the MODs will be dependent of HUD’s approval of the Action Plan)

The GLO will provide training, written guidance, and forms to the COGs for the development of the MODs. Each COG will be provided data sets produced by the GLO in partnership with the University of Texas at Austin to inform methods of distribution. Variances from these data sets will be allowable. Data sets provided by the GLO may contain information at the county, city, and/or zip code level.¹ Applicant-specific data may not be available. For COGs and communities seeking to receive applicant-specific data, an Information Sharing Access Agreement (ISAA) must be developed between FEMA and the entity. For more information on the ISAA process please contact the GLO who will provide you with the appropriate FEMA representative.

Each COG will follow a citizen participation process. A published notice of any public hearings is required prior to holding the hearings. Notices shall be published in all newspapers of record in the region, posted on the COG’s website and provided to all eligible cities, counties, and other stakeholders in the region. Hearings must fully comply with the Texas Open Meetings Act.

The draft MOD shall be posted on the COG’s website for public comment prior to submission to the GLO. The public comment period shall be no less than 14 calendar days. Each comment shall be responded to, and any changes made to the draft MOD shall be noted in the response section for GLO review. The MODs are to be completed 60 days from the GLO’s submission of the Action Plan to HUD.

¹ Data sets at the zip code level are *only* available for the Local Buyout and Acquisition Program, not the Local Infrastructure Program. Data for the Local Infrastructure Program will be provided at the applicant level.

Upon completion, the GLO will review and approve MOD submissions by each COG. All MODs will be wholly reviewed to ensure that each COG provides a detailed description of the methodology used to allocate and prioritize funds within their regions. If the MOD is not approved, the GLO will provide feedback and/or identify any issues with the MOD to the COG. The GLO will allow five of days for the COG to rectify or address the issues identified in their MOD by the GLO. Official approval of the MODs by the GLO will be dependent on HUD's approval of the Action Plan.

A. Program and Activity Requirements

The following are the program and activity requirements from the Action Plan for the local buyout and acquisition and local infrastructure program.

1. Local Buyout and Acquisition Program

The local buyout and acquisition program will remove homes from harm's way.

a. Local MOD Requirements:

- i. Each COG will facilitate a MOD process with support of the GLO;
- ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);
- iii. Citizen participation process:
 1. Develop a citizen participation plan;
 2. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;
 3. One (1) public hearing shall be a "Public Planning Meeting;"
 4. Ensure a public comment period of at least 14 days.
- iv. Implement a minimum of \$1,000,000 in CDGB-DR funds to any local entity receiving funding through the MOD;
- v. Ensure a minimum percentage of funds are allocated to the HUD most impacted and distressed counties and zip codes;
- vi. Facilitate local prioritization through the MOD;
- vii. Reallocation of funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region;
- viii. A plan to meet the 70 percent low- and moderate-income benefit requirement;
- ix. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.

b. Allocation Amount: \$275,620,892

- i. Eighty (80) percent of funds must address unmet need in the HUD "most impacted and distressed" areas (counties and zip codes);

- ii. Twenty (20) percent of funds must address unmet need in the impacted counties and counties minus its HUD “most-impacted and distressed” zip codes.

c. Eligible Entities:

- i. Units of local government and entities with the power of eminent domain authority.

d. Eligible Activities:

- i. Buyouts;
- ii. Acquisition;
- iii. Relocation Assistance with buyout or acquisition activities;
- iv. Down-payment Assistance with buyout or acquisition activities;
- v. Demolition only;
- vi. Activities designed to relocate families outside of floodplains;
- vii. Public service within the 15 percent cap (e.g., housing counseling, legal counseling, job training, mental health, and general health services);
- viii. FEMA Hazard Mitigation Grant Program (HMGP) cost share.

e. Ineligible Activities:

- i. Incentive payments to households that move to disaster-impacted floodplains. Activities located within the city limits of Houston and/or within Harris County are ineligible to participate in the program.

2. Local Infrastructure Program

The Local Infrastructure Program will provide disaster relief, long-term recovery, and restoration of infrastructure for local communities impacted by Hurricane Harvey. Each infrastructure activity must demonstrate how it will contribute to the long-term recovery and restoration of housing. For the local infrastructure program for the HUD identified most-impacted and distress areas, the amount does not include the ZIP codes, only the HUD identified most-impacted and distressed counties.

a. Local MOD Requirements:

- i. Each COG will facilitate the MOD process with GLO support;
- ii. Establish objective criteria for allocation of funds to eligible entities or activities (distribution based on, but not limited to, unmet need);
- iii. Citizen participation process:
 - 1. Develop a citizen participation plan;

2. Conduct a minimum of two (2) public hearings prior to finalizing the MOD;
3. One (1) public hearing shall be a “Public Planning Meeting;”
4. Ensure a public comment period of at least 14 days.
- iv. Implement a minimum of \$100,000 in CDGB-DR funds to any local entity receiving funding through the MOD;
- v. Ensure a minimum percentage of funds are allocated to the HUD “most impacted and distressed” counties and zip codes;
- vi. Facilitate local prioritization through the MOD;
- vii. Reallocation of funds from de-obligated funds and/or cost savings from completed projects will be at the discretion of the GLO within the region;
- viii. A plan to meet the 70 percent low- and moderate-income benefit requirement;
- ix. Establish any additional parameters for eligibility beyond what is required by HUD or the GLO.

b. Allocation Amount: \$413,431,338

- i. Eighty (80) percent of funds must address unmet need in the HUD identified “most impacted and distressed” areas (counties only) for applicable region;
- ii. Twenty (20) percent of funds must address unmet need in the remaining impacted counties.

c. Eligible Entities:

- i. Units of local government (cities and counties)

d. Eligible Activities:

All activities allowed under CDBG-DR, including but not limited to:

- i. Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management systems;
- ii. Restoration of infrastructure (such as water and sewer facilities, streets, provision of generators, removal of debris, bridges, etc.);
- iii. Demolition, rehabilitation of publicly or privately-owned commercial or industrial buildings, and code enforcement;
- iv. Economic development (such as microenterprise and small business assistance, commercial rehabilitation, and special economic development activities, including prioritizing assistance to businesses that meet the definition of a small business);
- v. Public service (such as job training and employment services, healthcare, child care, and crime prevention within the 15 percent cap).

e. Ineligible Activities:

- i. CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
 1. Register and maintain entries regarding such structures with the U.S. Army Corps of Engineers National Levee Database or National Inventory of Dams;
 2. Ensure that the structure is admitted in the U.S. Army Corps of Engineers PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
 3. Ensure the structure is accredited under the FEMA National Flood Insurance Program;
 4. Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- ii. Funds may not be used to assist a privately-owned utility for any purpose;
- iii. Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers);
- iv. No disaster recovery assistance will be considered with respect to any part of a disaster loss that is reimbursable by the Federal Emergency Management Agency (FEMA), the Army Corps of Engineers (USACE), insurance, or another source due in part to the restrictions against duplication of benefits outlined in the Action Plan. An activity underway prior to the Presidential Disaster Declaration will not qualify unless the disaster directly impacted said project.
- v. By law, (codified in the HCD Act as a note to 105(a)), the amount of CDBG–DR funds that may be contributed to a USACE project is \$250,000 or less.

B. The Citizen Participation Plan

The COGs must submit the Citizen Participation Plan to the GLO. The Participation Plan must include the following:

1. Outreach

The Citizen Participation Plan must include a description of efforts to reach out to local governments, housing advocacy organizations, other community groups, and faith-based organizations. The COG must make efforts to bring non-elected members of the community into discussions regarding the MOD. For example, the COG could work with places of worship, schools and other places where large groups of citizens gather. The COG may also utilize radio and television public service announcements.

The COG must contact and work with organizations representing protected classes of individuals, as well as organizations interested in fair housing issues, in order to gain additional perspective on fair housing and civil rights issues in the COG. This exercise should also help the COG understand how the people they represent were affected by Hurricane Harvey. Approaches beyond simple written notification of public hearings are encouraged. For example, the COG could host a separate meeting with housing advocacy groups active in the region or visit local offices of civil rights groups. The COG could also pursue personal outreach by calling groups individually.

The COG must reach out to and accommodate for Limited English Proficient (LEP) Persons and the organizations that serve them. As appropriate, the COG should consult the *Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, published on January 22, 2007, in the Federal Register (72 FR 2732) and the GLO Language Assistance Plan. The GLO encourages the COG to pursue additional efforts to reach out to the public and accommodate LEP persons. The GLO must be sent information regarding additional meetings, hearings and workshops and other requests for public comment contributing toward the development of the MOD.

2. Notice and Public Comment

The COG must identify the schedule for the two public hearings and notices in the Participation Plan. Notice of the hearings' schedule must be posted, according to the instructions below, in a newspaper, and on the COG's website. One hearing shall be a public planning meeting and at least one other hearing must take place while the draft MOD is available for public comment. The meetings must be at a time and place convenient to the public.

3. Accessibility

The COG must identify how it will accommodate the needs of any person with a disability, including holding all meetings in accessible facilities and making reasonable accommodations.

4. Participation Plan Instructions

1. List the date the draft MOD will be posted and made available to the public and the date the public comment period ends. In addition, a hard copy must be made available for public inspection. **This comment period must be at least 14 calendar days.**
2. List the date and location for the two required hearings and identify which hearing is the public planning meeting.

3. Include all content listed in the template provided with these guidelines in all hearing notifications.
4. In order to timely post on the GLO website, the GLO must receive the hearing notices at least five (5) days in advance of the hearing dates via email to cdr@glo.texas.gov.
5. Personal Notice – identify the methods used to provide personal notice, which must be sent at least five (5) days prior to each public hearing. The COG may use any or all methods listed, but must include the following documentation for each type:
 - a. Electronic Mail – attach list of recipients receiving notification in this manner, as well as copies of the emails.
 - b. Fax – attach list of recipients receiving notification in this manner, as well as a copies of the letters.
 - c. Hand Delivery – attach list of recipients receiving notification in this manner, as well as copies of the letters and a signature sheet signed by the person receiving notice.
 - d. Mail – attach list of recipients receiving notification in this manner, as well as copies of the letter and recipient address.
6. Website – notice on the COG’s website must take place at least five (5) days prior to each hearing. Appropriate documentation includes an attached printed copy of each hearing notice on the website.
7. Newspaper – ensure that the notice of each public hearing be published in at least one (1) regional newspaper (or general circulation) three (3) or more days in advance of the hearing. Appropriate documentation includes an attached copy of the hearing notice and a publisher’s affidavit, or a full-page of the publication that includes the notice, date of the publication, and the publication name.
8. Describe the efforts to be used to notify and accommodate those individuals with modified communication needs, such as Limited English Proficient citizens or those with hearing disabilities.
9. Describe the efforts to be used to contact the organizations representing protected classes of individuals and vulnerable populations and the issues identified by those discussions must be described.

C. Method of Distributions Summary Form

As part of the MOD develop, the COG will be required to complete the MOD Summary Form, allocation summary and calculation worksheets, and provide any supporting documentation.

1. Primary Contact and Allocation Summary

The COG must identify a principal contact person and include contact information. The COG must list its total COG allocation amount for each program as identified in Tables 1 and 2.

2. Citizen Participation Plan Documentation

The COG must provide a copy of a sign-in sheet and draft minutes or official signed minutes from the meeting from the public meeting and hearings in the MOD submittal. In addition, the COG must provide the citizen comments and the COG response to each comment received during the public hearing or public comment period.

3. Long-Term Planning and Recovery

The COG shall provide an explanation of how the MOD fosters long-term community recovery that is forward-looking and focused on permanent restoration of infrastructure, housing, and the local economy with a primary focus on the restoration of housing in the HUD most impacted and distressed and other impacted areas. Additional documentation such as planning documents considered, reports reviewed and other references used must be attached. If the document is available on the Internet, the COG should provide a link. For example, the COG may use locally adopted comprehensive plans and hazard mitigation plans from cities and counties included in its area to establish funding priorities in the MOD. Likewise, the COG may use plans developed following the disaster.

5. Unmet Housing Needs

The COG shall provide an explanation of how unmet housing needs will be addressed or how economic revitalization or infrastructure activities will contribute to long-term recovery and restoration of housing in the most impacted and distressed areas.

6. Low-to-Moderate Income Requirements

The COG must meet the 70 percent low-to moderate income (LMI) benefit requirement for its allocation. This means that 70 percent of allocated funds must benefit areas that are 51 percent or more LMI households or benefit households with incomes below 80% of the Area Median Income (AMI).

7. Affirmatively Furthering Fair Housing Statement

All subrecipients will certify that they will affirmatively further fair housing (“AFFH”) in their grant agreements, and will receive GLO training and technical assistance in meeting their AFFH obligations. Additionally, all project applications will undergo AFFH review by GLO before approval. Such review will include assessment of a proposed project’s area demography, socioeconomic characteristics, housing configuration and needs, educational, transportation, and health care opportunities, environmental hazards or concerns, and all other factors material to the AFFH determination. Applications should show that projects are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

8. MOD Details

In providing its local buyout and acquisition program and local infrastructure program MOD detail, the COGs must meet the following requirements:

1. The COG must use a direct allocation technique based on objective, verifiable data to distribute funds for the two programs.
 - a. For the local buyout and acquisition program. An objective, verifiable means to do so might use the LMI percentage for each entity based on HUD Low-to-Moderate Income Summary Data (LMISD) derived from Census Bureau’s American Community Survey (ACS) Information or the National Flood Insurance Program repetitive loss data.
 - b. For the local infrastructure program, for example, the COG may wish to consider economic and financial impacts on entities in distributing the funds. An objective, verifiable means to do so might use the LMI percentage for each entity based on HUD Low-to-Moderate Income Summary Data (LMISD) derived from Census Bureau’s American Community Survey (ACS) Information or FEMA public assistance project data.
2. Allocations to any entity selected by the COG must:
 - a. For the local buyout and acquisition program, meet or exceed a floor of \$1,000,000 in order to assure project feasibility.
 - b. For the local infrastructure program, meet or exceed a floor of \$100,000 in order to assure project feasibility.
 - c. The maximum award for each program may not exceed the available COG allocation (see Tables 1 and 2).

3. The COG may choose to limit the types of projects allowed or prioritize types of projects. The COG should select whether it wishes to limit grantees to specific project priorities, or maintain all eligible activities.
4. The COG may not transfer responsibility for developing the MOD to another unit of general local government. The COG must make all final allocations.
5. The COG must identify the process and factors used to determine which subrecipient will receive funds under the MOD. If threshold factors were used in addition to the factors used to make the allocations, then the threshold factors must be identified. For example, the COG may select the subrecipients with the ten highest FEMA public assistance totals for inclusion with the MOD, or the subrecipients with the 15 highest LMI percentages.

9. Approval and Signatory Authority

The completed MOD Summary Form must be signed by an authorized signatory. The COG must also submit a signed resolution adopted by the COG Board authorizing submittal of the completed MOD Form and Worksheets. If the COG resolution will be submitted after the MOD deadline, the State will accept the preliminary MOD for review, and a conditional approval may be given pending submittal of the resolution.

D. Allocation Summary Worksheet

The GLO has provided an optional Allocation Summary Worksheet and Detail Worksheet template to assist the COGs with their calculation. Two separate calculations will be necessary for the HUD most impacted and distressed areas (80%) and the other impacted areas (20%) allocations to each COG.

1. An Allocation Summary Worksheet is included for completion associated with the MOD Detail section. The dollar amounts listed in Tables 1 and 2 of this document must correspond with the amounts calculated in that worksheet.
2. The Detail Worksheet is a template for the objective factor calculations and includes a calculation for the 70 percent low-to moderate income persons benefit requirement.
3. The worksheets must meet all other requirements discussed in the MOD section.

Submissions of documents may be made electronically via Adobe Portable Document File (*.pdf) format. The GLO requests that electronic submission of any spreadsheets be in a format readable by Microsoft Excel with all formulas intact.

III. Appendix A: CDBG-DR Counties by COG

CDBG-DR Eligible Counties	COG	CDBG-DR Eligible Counties	COG
Comal	AACOG	Calhoun	GCRPC
Guadalupe	AACOG	DeWitt	GCRPC
Karnes	AACOG	Goliad	GCRPC
Burleson	BVCOG	Gonzales	GCRPC
Grimes	BVCOG	Jackson	GCRPC
Madison	BVCOG	Lavaca	GCRPC
Washington	BVCOG	Victoria	GCRPC
Bastrop	CAPCOG	Austin	H-GAC
Caldwell	CAPCOG	Brazoria	H-GAC
Fayette	CAPCOG	Chambers	H-GAC
Lee	CAPCOG	Colorado	H-GAC
Aransas	CBCOG	Fort Bend	H-GAC
Bee	CBCOG	Galveston	H-GAC
Jim Wells	CBCOG	Harris	H-GAC
Kleberg	CBCOG	Liberty	H-GAC
Nueces	CBCOG	Matagorda	H-GAC
Refugio	CBCOG	Montgomery	H-GAC
San Patricio	CBCOG	Walker	H-GAC
Milam	CTCOG	Waller	H-GAC
Jasper	DETCOG	Wharton	H-GAC
Newton	DETCOG	Hardin	SETRPC
Polk	DETCOG	Jefferson	SETRPC
Sabine	DETCOG	Orange	SETRPC
San Augustine	DETCOG		
San Jacinto	DETCOG		
Tyler	DETCOG		