



St. Louis County, Missouri

**2022 Community Development Block Grant Disaster Recovery (CDBG-DR)
Program Administrative Costs Action Plan**

I. Background:

The purpose of the Program Administrative Costs (PACs) Action Plan for the 2022 Community Development Block Grant – Disaster Recovery (CDBG-DR) is to begin using funds for allowable administrative activities prior to the submission of the full program Action Plan at a later date. This will allow St. Louis County as the administering agency to initiate planning activities, coordinate with eligible units of local government, procure, and utilize consulting assistance for the creation of the CDBG-DR Action Plan, and general administrative assistance for the program.

Grantee Name:	St. Louis County
State:	Missouri
Date Plan Submitted:	June 25, 2024
Total Grant Amount:	\$56,425,000
Amount of Administrative Funds Budgeted:	\$2,821,250
Grantee Contact (Name):	Kevin C. McKenna
Grantee Contact (Email/Phone):	Kmckenna2@stlouiscountymo.gov ; 314-615-6024
HUD Contact (Name):	Justin Jackson
HUD Contact (Email/Phone):	Justin.M.Jackson@hud.gov ; 314-418-5290

II. Public Notices and Comment Period:

Grantees must publish the proposed action plan for program administrative costs, and substantial amendments to the plan, for public comment. To permit a more streamlined process, HUD waived the provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, 24 CFR 91.105(b) through (d), and 24 CFR 91.115(b) through (d), with respect to citizen participation requirements. Instead, the manner of publication of the action plan for program administrative costs must include prominent posting on the grantee’s official disaster recovery website and must afford residents, affected local governments, and other interested parties a reasonable opportunity to review the contents of the plan or substantial amendment (no less than seven days). Grantees must offer multiple methods (including electronic submission) for receiving comments on the action plan or substantial amendment.



Grantees must consider and respond to all oral and written comments. Any updates or changes made to the action plan or substantial amendment in response to public comments received should be clearly identified in the action plan. A summary of comments and the grantees’ response to each, must be included with the action plan or substantial amendment. Grantees’ responses shall address the substance of the comment rather than merely acknowledge that the comment was received.

This Program Administrative Costs Action Plan has been published on the County CDBG-DR website. ***Interested parties who wish to comment are required to do so no later than June 21, 2024.*** Comments will be accepted via any of the following methods:

- Email: kmckenna2@stlouiscountymo.gov
- Phone: 314-615-6024
- Mail: Attn: Kevin McKenna, 500 Northwest Plaza Drive, Suite 801, St. Ann, MO 63074

Proof of posting for seven days attached	<i>See Enclosed Documents</i>
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Public Comments Received (Insert additional rows, as needed)	Grantee Responses
<i>No public comments were submitted</i>	<i>N/A</i>

III. Proposed Allocation of Funds:

Public Law 117-180 allocated \$56,425,000 in disaster recovery and mitigation funding to St. Louis County for jurisdictions impacted under FEMA DR-MO-4665. Up to 5% (\$2,821,250) of the total allocation may be used for the administration of the program. Administration costs are necessary to support expenses related to administrative activities and include Action Plan development, community engagement, overall grant management, compliance and monitoring, and other costs specified as eligible administrative expenses in 24 CFR 570.206. Under the PACs Action Plan St. Louis County is proposing to receive access to the full 5% or \$2,821,250 for the following allowable administrative activities:

Program Administration Activity	Budget/ Allocation
Total (Amount up to 5% of grant total) <ul style="list-style-type: none"> • Staff time, administrative costs, and consulting fees associated with the development, oversight and management of 	\$2,821,250



<p>the Action Plan and general CDBG-DR grant set-up including financial certifications, capacity assessment and implementation plan.</p> <ul style="list-style-type: none">• Staff time, administrative costs, and other expenses associated with the development of the request for proposal (RFP) documentation to procure a qualified third-party to assist with the development of the Action Plan and the administration of the grant program. Advertising and publication costs associated with the solicitation may be included.• Staff time, administrative costs and other expenses associated with activities and services for Action Plan drafting, public engagement, and technical assistance support.• Staff time, administrative costs, and other expenses associated with the design, development, review and implementation of resilience and recovery programs and activities.	
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IV. Criteria for Eligibility:

Per the federal regulations, grantees may include activities listed at Section 105(a)(12) and (13) of the HCDA, as well as activities spelled out in 24 CFR 570.205 and 570.206. The above proposed uses of funds fall under Section 105(a)(12) (A) and (B).

V. Certifications and Standard Form 424 (SF-424):

St. Louis County, as the HUD grantee, makes the following certifications:

- The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice.
- The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a state grantee must follow a detailed



citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements).

- The grantee certifies that it is complying with each of the following criteria:
 - Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.
 - The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing:
 - A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.



- The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice.
- The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- The grantee certifies that it will comply with the provisions of Title I of the HCDA and with other applicable laws.

VI. Additional Information and Resources:

To view the St. Louis County CDBG-DR webpage, follow this link:

[St. Louis County CDBG-DR](#)

To access the Federal Register Notice related to the 2022 CDBG-DR grant, follow this link: [82](#)

[FR 32046](#)

Signature of Certifying Official

(Printed Name of Certifying Official)

(Date)