

National Objective Determination/Eligibility

Under DRGR, national objective determination is based upon the type of information reviewed to document compliance with 24 CFR 570.208 depend in part on what type of activities are being undertaken. Many activities may use the national objective Urgent Need related to disaster recovery, but it is important to remember that at least 50% of spending for non-administrative activities under Disaster Recovery CDBG must be for activities classified as benefiting Low to Moderate Income households. HUD will examine an overall benefit test, but it will also examine individual activities to ensure their national objective is correctly classified and has required support in data shown in DRGR. In order to examine this information in DRGR, this means that program classified under the Low Mod national objective will often require more detail than programs classified under Urgent Need.

For the City of Columbia, the following projects will be direct benefit (households or housing units) vs area benefit (no infrastructure or public facilities). The City will include projections for these in their DRGR Action Plans and enter actual accomplishments in their Quarterly Performance Reports (QPRs).

For CDBG-DR projects, the National Objectives will either be:

- Benefiting LMI or Low-Mod Benefit
- UN or Urgent Need
- Planning and Administration are N/A for National Objective Determination

The City of Columbia has the National Objective Determination for the following project activities:

Project Name	Activity Category	Objective Determination	Benefit Type
Columbia Homeownership Assistance Program (CHAP)	Rehabilitation or Reconstruction of residential structures	Low/Mod-Direct Benefit	Direct Household
Minor Rehabilitation Program (MRP)	Rehabilitation of residential structures	Low/Mod-Direct Benefit	Direct Household
Minor Rehabilitation Program (MRP)	Rehabilitation of residential structures	Urgent Need – Direct Benefit – households over 80% but at or under 120% LMI	Direct Household
Small Rental Rehabilitation Program (SRRP)	Reconstruction and/or Replacement of 1-4 rental units	Low/Mod – Direct Benefit of Tenants that are 80% and below LMI	Direct Household
Columbia Elevation Reimbursement Program	Elevation of residential properties above BFE	Low/Mod-Direct Benefit	Direct Household
Columbia Elevation Reimbursement Program	Elevation of residential properties above BFE	Urgent Need – Direct Benefit – households over 80% but at or under 120% LMI	Direct Household

Multi-Family Affordable Housing Fund	Acquisition, demolition for Reconstruction and/or Construction of rental units of more than 4 rental units	Low/Mod-Direct Benefit	Direct Household
HMGP Buyout/FEMA HMGP Match	CDBG-DR provides 25% to the FEMA HMGP Buyout of eligible properties that are damaged in floodway or floodplain. Properties are acquired and demolished with a feasibility land use plan. The plan will not include building structures into perpetuity on acquired land.	Urgent Need – Direct Benefit – households over 80% but at or under 120% LMI	Direct Household
Small Business Disaster Recovery Program	Economic development for small businesses	Low/Mod-Area Benefit	Census or Survey Info
Canal Head Gates Project - Public Facilities and Improvements	Project funding for bulkheads in front of Columbia Canal Head Gates.	Urgent Need – Area Benefit	Census or Survey Info

Grantees will include projections for these in their DRGR Action Plans and enter actual accomplishments in their Quarterly Performance Reports (QPRs).

For projects under Urgent Need: The City shall list activities separately for each responsible organization awarded funds administering these activities and if they are different activity types. Otherwise, they may aggregate information at this level if they share documentation documenting compliance with the Urgent Need national objective.

For Low/Mod Area Benefit: The City shall list activities separately for each responsible organization awarded funds administering these activities. For Low Mod Jobs, they must either enter each business as a separate activity or upload a file that has information for each business assisted with cumulative totals of jobs created or retained with income and race/ethnicity information for each business. For Low Mod Area Benefit, they must enter each business as a separate activity based on the residential area served by the business using the Census or Survey data methods.