



# Rebuild Florida General Planning Support Program

## GENERAL PLANNING SUPPORT PROGRAM GUIDELINES

This document provides the guidelines for implementation of the Rebuild Florida General Planning Support (GPS) program administered by the State of Florida Department of Commerce (FloridaCommerce). This Program is funded by the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant - Mitigation (CDBG-MIT) allocation as described in Public Law 115-123.

**VERSION 1.6**

4/29/2024

## VERSION HISTORY

Version Number	Change Date	Summary of Changes
1.0		Original Version
1.1-1.2		Minor document changes
1.3	6/11/2021	Updated Fraud, Waste, and Abuse section
1.4	8/2/2021	Updated references to “Office of Disaster Recovery” to “Office of Long-Term Resiliency” Updated FloridaCommerce address Updated Anti-Fraud, Waste, and Abuse section
1.5	9/17/2021	Inserted Version History table, Version Policy, and Policy Change Control Renumbered document pages Completed formatting edits throughout the document to create consistency between all program guidelines documents
1.6	4/29/2024	As of July 1, 2023, and per Florida HB 5, ch. 2023-173, L.O.F. the former Florida Department of Economic Opportunity has been renamed the Florida Department of Commerce, referred to as “FloridaCommerce.” To reflect this change, all references to the former Florida Department of Economic Opportunity (including “the Department” and “DEO”) have been updated to represent FloridaCommerce. Associated branding (including logos, fonts, and colors) has been updated throughout the document.

The Office of Long-Term Resiliency established a new Version Policy in August 2021. Gaps in version history prior to this change may be present.

## **VERSION POLICY**

Version history is tracked in the Version History Table (page i), with notes regarding version changes. Dates of each publication are also tracked in this table.

Substantive changes in this document that reflect a policy change will result in the issuance of a new version of the document. For example, a substantive policy change after the issuance of Version 1.0 would result in the issuance of Version 2.0, an increase in the primary version number. Non-substantive changes such as minor wording and editing or clarification of existing policy that do not affect interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase behind the primary version number (i.e., Version 2.1, Version 2.2, etc.).

## **POLICY CHANGE CONTROL**

Policy review and changes for the State of Florida Office of Long-Term Resiliency are considered through a change-control process. Policy clarifications, additions, or deletions are needed during the course of the program to more precisely define the rules by which the Program will operate. Program staff will document policy-change requests that will be tracked in the program files. Requests are compiled and brought before supervisory staff in a policy meeting. Subject matter experts working in a particular policy area or task area that will be affected by the policy decision may be invited to assist in policy evaluation, if necessary. Policy meetings will be held as frequently as is necessary to consider policy decisions critical to moving the Program forward in a timely manner. Policy decisions will be documented and will result in the revision of the document in question.

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## Part 1 Definitions and Acronyms

**Action Plan:** The State of Florida Mitigation Action Plan details the plan to carry out strategic and high-impact activities to minimize or eliminate risks and reduce losses from future disasters. The Plan also describes the opportunity to improve state and local planning protocols and procedures. The Plan was submitted to HUD on February 3, 2020 and approved on April 2, 2020.

**Applicant:** Any entity that submits a response to the request for applications (RFA) for potential funding through the CDBG-MIT program.

**AMI - Area Median Income:** The median (middle point) household income for an area adjusted for household size as published and annually updated by the United States Department of Housing and Urban Development (HUD). Once household income is determined, it is compared to HUD's income limit for that household size.

**CDBG:** Community Development Block Grant, funded by the U.S. Department of Housing and Urban Development.

**CDBG-MIT:** Community Development Block Grant for mitigation projects. **CDBG-DR:** Community Development Block Grant for disaster recovery projects. **CFHP:** Critical Facility Hardening Program.

**Copeland Act:** Anti-Kickback Act

**CWHSSA:** Contract Work Hours and Safety Standards Act

**DBA:** Davis-Bacon Act (DBA)

**FloridaCommerce - Department of Commerce:** Administrator of the CDBG-MIT program funded by HUD under Public Law 115-123. FloridaCommerce is the governor-designated state authority responsible for administering all long-term hazard mitigation and disaster recovery funds awarded to the state from HUD.

**DEM:** (Florida) Division of Emergency Management.

**DOB - Duplication of Benefits:** A duplication of benefits occurs if FloridaCommerce provides assistance to a participant for the same purpose as any previous financial or in-kind assistance provided to an entity for the same purpose. The FloridaCommerce CDBG-MIT program is prohibited from creating a DOB. This prohibition comes from the Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) and therefore, these other sources of funds must be deducted from any potential award or expenditures for individual participants.

**FEMA:** Federal Emergency Management Agency.

**FR - Federal Register:** The official journal of the Federal government of the United States that contains government agency rules, proposed rules, and public notices. A Federal Register Notice (FRN) is issued for each CDBG-DR funded disaster. The FRN outlines the rules that apply to each allocation of disaster funding.

**HUD:** U.S. Department of Housing and Urban Development.

**LMH - Low to Moderate Income Household:** A household having an income equal to or less than the Section 8 low income limit established by HUD.

**LMI - Low to Moderate Income National Objective:** Activities that benefit households whose total annual gross income does not exceed 80% of AMI, adjusted for family size. Income eligibility will be determined and verified in accordance with HUD guidance. The most current income limits, published annually by HUD, will be used to verify the income eligibility of each household applying for assistance at the time assistance is provided.

- **Extremely low:** Household's annual income is up to 30% of the area median family income, as determined by HUD, adjusted for family size.
- **Very Low:** Household's annual income is between 31% and 50% of the area median family income, as determined by HUD, adjusted for family size.
- **Low:** Household's annual income is between 51% and 80% of the area median family income, as determined by HUD, adjusted for family size.

**MIDs - Most Impacted and Distressed Areas:** Areas of most impact as determined by HUD or the state using the best available data sources to calculate the amount of disaster damage. The HUD-designated MID areas include Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami-Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Johns, St. Lucie and Volusia counties; and zip codes 32084, 32091, 32136, 32145, 32771, 33440, 33523, 33825, 33870, 33935, and 34266. The state-identified MID areas also include those counties that received both Individual Assistance (IA) and Public Assistance (PA) through the Federal Emergency Management Agency (FEMA).

**RFAs - Request for Applications:** The FloridaCommerce notice requesting applications for funding as a subrecipient for the CDGB-MIT program.

**Response:** Any application received for CDBG-MIT funding.

**Subrecipient:** Any entity that has been awarded funding by FloridaCommerce to implement a CDBG-MIT project and that has executed a subrecipient agreement.

**Subrecipient agreement:** An agreement between FloridaCommerce and a subrecipient that has been awarded funding to implement a CDBG-MIT project. The agreement details the conditions under which funds are provided and the contractual obligations to which the subrecipient must adhere.

**Subrogation:** Subrogation is a legal doctrine that allows one entity to take on the rights of another. In the context of mitigation grants, a subrecipient must enter into a subrogation agreement in which the funding agency (FloridaCommerce) obtains the right to collect any additional mitigation payments the entity obtains for the same purpose after the entity has received GPS benefits.

**UGLG:** Units of general local government including cities, towns, villages, counties and other municipalities of a state.



## Part 2 Program Overview

### 2.1 Program Purpose

In April 2018, the U.S. Department of Housing and Urban Development (HUD) announced that the state would receive \$633,485,000 in funding to support long-term mitigation efforts (following Hurricanes Hermine, Matthew and Irma) through HUD’s Community Development Block Grant Mitigation (CDBG-MIT) Program. The Federal Register Vol. 84, No. 45838, which delineates all program requirements, was released on August 30, 2019.

This funding is designed to address mitigation needs to ensure that the state of Florida is more resilient to future natural disasters. The Florida Department of Commerce (FloridaCommerce) is the lead agency and responsible entity for administering the CDBG- MIT funds allocated to the state. The state of Florida’s Action Plan, which was approved by HUD on April 2, 2020, details how this funding, along with subsequent allocations, will be apportioned to address unmet mitigation needs in Florida that represent targeted strategic investments for grantees based on current or foreseeable risks.

The purpose of this allocation is to support high-quality mitigation planning that will build a foundation for continuous coordination and data-driven outcomes in the state of Florida. Planning projects should be oriented towards regional projects that mitigate high-impact hazards and integrate multiple programs and funding sources. The resulting plans should detail community hazards and present realistic solutions for treatment of these hazards.

Communities are encouraged to work with neighbors to identify common hazards and create a regional plan that will benefit more than one community.

The final plans must include a Mitigation Needs Assessment of disaster risks, including anticipated effects of future extreme weather events and other hazards, as described in 84 FR 45838.

These mitigation funds represent a unique and significant opportunity for the state, in the areas most impacted by recent disasters, to carry out strategic and high-impact activities to minimize or eliminate risks and reduce losses from future disasters. In addition to mitigating disaster risks, the funds provide an opportunity to improve state and local planning protocols and procedures.

Florida’s focus is to support data-informed investments through high-impact projects that will reduce risks attributable to natural disasters, with particular attention to repetitive losses of property and critical infrastructure. FloridaCommerce’s strategy is built on a comprehensive Risk Based Mitigation Needs Assessment, presented in its Action Plan, that identified flooding, severe storms, tropical cyclones, coastal erosion and wildfires as the most significant risks to Floridians.

The state supports the adoption of policies that reflect local and regional priorities that will have long-lasting effects on community risk reduction, to include the reduction of risk to community lifelines. Community lifelines enable the continuous operation of government functions and critical businesses that are essential to human health and safety or economic security.

The goal is to help protect critical community lifelines which are illustrated in **Figure 1**:



Figure 1: Community Lifelines

**Table 1** illustrates Florida’s plan for allocation of CDBG-MIT funds.

**Table 1: Allocation of CDBG-MIT Funds**

Allocation of CDBG-MIT Funds		
Program	Allocation	Percent of Funding
Infrastructure	\$550,000,000	87%
Rebuild Florida General Infrastructure Program	\$475,000,000	75%
Rebuild Florida Critical Facility Hardening Program	\$75,000,000	12%
Planning and Administrative Costs	\$83,485,000	13%
Rebuild Florida General Planning Support Program	\$20,000,000	3%
FloridaCommerce Administration	\$31,674,250	5%
FloridaCommerce Planning	\$31,810,750	5%
<b>Total Allocation</b>	<b>\$633,485,000</b>	<b>100%</b>

## 2.2 Program Process

CDBG-MIT programs will be delivered in a multi-step process to comply with all applicable regulations and requirements. The preliminary process includes a Request for Applications (RFA) and submission of applications by eligible entities, followed by application evaluation and scoring process that will result in an award of funding and the execution of a subrecipient agreement. The selected subrecipients will be responsible for delivery of services.

During the implementation process, as subrecipients meet specified deliverables, program funding will be provided to subrecipient awardees. Subrecipients must develop and implement policies, procedures and processes to deliver projects/services. Projects/services may be provided by the subrecipient directly or in partnership with governmental, private sector or non-profit partners. At the conclusion of the term specified in the subrecipient agreement, the grant will be closed. FloridaCommerce, with support provided by its designated partners, will monitor subrecipients throughout the life of the project.

**Figure 2** illustrates the preliminary process.



*Figure 2: Preliminary Process—Application, Evaluation and Award*

**Figure 3** illustrates the implementation process.



*Figure 3: Implementation Process—Service, Delivery and Compliance*

## 2.3 Rebuild Florida General Planning Support (GPS) Program Overview

The GPS program is designed to provide funding opportunities to units of general local government (UGLG), educational institutions, state agencies, and non-profits the purposes of developing and updating state, regional and local plans.

FloridaCommerce recognizes that planning is an important aspect of mitigation and that not all UGLGs have access to full-time planning staff. The GPS program provides rarely accessible funds to create regional plans that will enable the state of Florida to withstand future disasters.

HUD has recognized that the most effective mitigation strategies are regional in scale. For this reason, HUD waived the requirements at 24 CFR 570.483(b)(5), which limit the circumstances under which planning activities may meet a low- to moderate-income national objective. Instead, Florida is required to comply with 24 CFR 570.208(d)(4) when funding planning grants. HUD recommends that planning activities be coordinated with local governments and regional planning councils.

FloridaCommerce has allocated \$20,000,000 in CDBG-MIT funding for the GPS program. FloridaCommerce will use a subrecipient model to deliver funding for approved projects. Funding will be awarded to selected subrecipients through a request for applications (RFA) process in accordance with established application guidelines and evaluation criteria. This is not a direct grant program.

An overview of the GPS program is illustrated in **Table 2**.

**Table 2: GPS**

Rebuild Florida General Planning Support Program	
Funding Dollars	\$20,000,000
Funding Percentage	3%
Application Type	Subrecipient
Applicant Eligibility	UGLG, state agencies, non-profits, and educational institutions
Geographic Eligibility	HUD and State-Designated MID areas
National Objectives Fulfilled	LMI and Urgent Need
Hazard Risks Addressed	Flooding, Severe Storms, Tropical Cyclones, Coastal Erosion, Wildfires
Lifelines Protected	Safety and Security, Food, Water and Shelter, Health and Medical, Energy, Communication, Transportation, and Hazardous Materials

- Maximum amount per project: \$10 million
- Minimum amount per project: \$20,000

## 2.4 Eligible Activities

Eligible activities are limited to projects that improve state and local mitigation planning mechanisms, however, a wide variety of plans are eligible to apply for funding.

Examples of eligible plans include, but are not limited to:

- Regional mitigation plans;
- Modernization and resiliency planning;
- Comprehensive, capital improvement, and community development plans;
- Floodplain and wetland management plans;
- Land use and urban environment plans;
- Historic preservation plans;
- Small area, housing and neighborhood plans;
- Integration of mitigation plans with other planning initiatives; and
- An inventory development of properties with known or suspected environmental contamination.

In addition to mitigation plans, the GPS program allows for a range of mitigation activities, including:

- Assessment of Fair Housing;
- Upgrading mapping, data and other capabilities to better understand evolving disaster risks;
- Planning and public service activities necessary to reduce flood insurance premiums in the National Flood Insurance Program's voluntary Community Rating System incentive program;
- Education and outreach campaigns designed to alert communities and prospective beneficiaries to opportunities to further mitigate identified risks through insurance, best practices and other strategies;
- Development and implementation of modern and resilient building codes to mitigate against current and future hazards; and
- Enhancement and update of real property registration and land information systems.

## 2.5 Program Requirements

1. Funds must be used solely for necessary expenses related to mitigation activities in the MID areas for which the President declared a major disaster in 2015, 2016 or 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974.
2. At least 50% of funds must be spent in HUD-identified MID areas. The remaining 50% may be spent on state-identified MID areas that were declared disaster areas eligible for FEMA individual and public assistance.
3. Funds may not be used to supplant existing funding sources or programming.
4. Entities applying for funding through the GPS program must submit an application that meets the criteria outlined in Part 4.
5. All CDBG-MIT projects must comply with all applicable federal, state and local requirements.
6. Any plan that considers housing must conduct an Affirmatively Furthering Fair Housing (AFFH) review of the plan to ensure equality.
7. Upon completion of the grant, subrecipients must submit proof of the completed work product that the application stated would be the end result of the grant funds.

## 2.6 Application for Program Services and Benefits

The application submission cycle for the GPS program will open on **May 15, 2020** and will close on **July 31, 2020, 5pm EST**. The application for the GPS program will be available on the FloridaCommerce Mitigation website: <http://floridajobs.org/rebuildflorida/mitigation>. Applicants may choose whether to submit the applications online or as a fillable PDF.

Only completed GPS subrecipient applications, including all requested supporting documentation, will be considered. FloridaCommerce developed an application reference guide to provide guidance to applicants (see Appendix B). Applications will only be accepted during the published application cycle.

Applicants must demonstrate that they have the capacity and expertise to conduct the activities for which they are requesting the funds. Applicants must explain how the plan will incorporate feedback from community members and how the final plan will be made available to the public. Applicants must also describe under what circumstances the plan should be updated and how that update will be funded.

Applications will be prepared at the applicant's expense and costs are not reimbursable using CDBG-MIT grant funds.

Competitive grant applications received by FloridaCommerce will be evaluated and scored on a 100 point scale. Applications are ranked based upon the assigned score. The highest- ranking applications are recommended for funding. Applications are funded, in order of ranking, to the greatest extent allowed by available funding.

To receive access to FloridaCommerce's user-friendly electronic application, instructions and submission checklist, a GPS Application Registration is available. This registration will open on **May 8, 2020** and will remain open throughout the submission cycle. To register, applicants should open this link: [floridajobs.org/rebuildflorida/mitigation/general-planning-support-program](http://floridajobs.org/rebuildflorida/mitigation/general-planning-support-program) and click "Online Application". A contact name and email address will be requested. Once registered, the applicant will be emailed an individualized application weblink. The application packet will be available from the CDBG-MIT website beginning on May 15, 2020.

Applicants are encouraged to use the electronic application; however, applicants can instead use a fillable PDF application that is available. The PDF version can be downloaded, completed and submitted online to [cdbg-mit@commerce.fl.gov](mailto:cdbg-mit@commerce.fl.gov) or mailed to:

Attention: Mitigation Team  
Office of Long-Term Resiliency  
Florida Department of Commerce  
107 East Madison Street  
Caldwell Building, MSC 400  
Tallahassee, FL 32399-2100

If a paper application is submitted in lieu of an electronic application, two identical hard copies must be submitted including any attachments or supporting documents. Paper applications must be postmarked by July 31, 2020. Late applications will not be accepted, under any circumstance, including delivery problems. FloridaCommerce will email application receipt confirmations as they arrive and/or by close of business on Tuesday, August 4, 2020.

FloridaCommerce is committed to ensuring a straightforward and uncomplicated application cycle. To facilitate that goal, applicants will be provided with several resources during the application cycle, including an application reference guide, a webinar and one-on-one phone calls with FloridaCommerce staff. The application reference guide is available in AppendixB.

Applicants may check on the status of their submissions by sending an email to [cdbg-mit@commerce.fl.gov](mailto:cdbg-mit@commerce.fl.gov), calling the toll-free mitigation line at (833)347-7863 or checking online at: [floridajobs.org/rebuildflorida/mitigation/general-planning-support-program](http://floridajobs.org/rebuildflorida/mitigation/general-planning-support-program).

## 2.7 Eligible Areas

At least 50% of funds must be spent in HUD-identified MID areas. The remaining 50% may be spent on state-identified MID areas. **Tables 3 and 4** identify areas eligible for CDBG-MIT funding; the HUD and State identified MID areas.

**Table 3: HUD MID Area Counties and Zip Codes**

HUD MID Counties	Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Johns, St Lucie, and Volusia
HUD MID Zip Codes	32084, 32091, 32136, 32145, 32771, 33440, 33523, 33825, 33870, 32068, 33935, 34266

**Table 4: State MID Area Counties**

State MID Area Counties	Alachua, Baker, Bradford, Charlotte, Citrus, Columbia, DeSoto, Dixie Flagler, Gilchrist, Glades, Hardee, Hendry, Hernando, Highlands Indian River, Lafayette, Lake, Leon, Levy, Manatee, Marion, Martin Nassau, Okeechobee, Pasco, Pinellas, Putnam, Sarasota, Seminole Sumter, Suwannee, Taylor, Union, Wakulla
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## 2.8 Allocation

A total of \$20,000,000 has been allocated for the GPS program. This allocation may be increased or decreased based on the demand for the program by amendment to the Action Plan, subject to approval by HUD.

## 2.9 Application Assistance Timeline

The application submission cycle for the GPS Program will open on May 15, 2020 and close on July 31, 2020. FloridaCommerce will host a webinar on May 21, 2020 at 2:00 PM EST to provide an overview of the Guidelines, specific to the application process. The webinar will include a live question and answer period. Beginning on May 26, 2020 FloridaCommerce will also provide an opportunity for applicants to schedule 20-minute, one-on-one phone calls with FloridaCommerce’s mitigation staff. These calls will provide applicants an opportunity to ask questions and/or discuss issues specific to their project and the application process.

Throughout the entire application cycle, technical assistance is also available by sending inquiries to the Mitigation email inbox at [cdbg-mit@commerce.fl.gov](mailto:cdbg-mit@commerce.fl.gov). The program will respond to all inquiries in a timely manner. Applicants may also visit the program webpage to view the progress bar at the top of the page which indicates the status of the application cycle.

## 2.10 National Objectives

All projects supported by HUD Community Development Block Grant (CDBG) assistance must meet one of the CDBG’s three National Objectives:

1. Benefiting low-and-moderate income (LMI) persons;
2. Addressing a severe and recently arising urgent community welfare or health need; or
3. Preventing or eliminating slum and blighting conditions.

FloridaCommerce’s GPS allocation is focused on addressing LMI and Urgent Needs. (Per 84 FR 45838, the slum and blight criteria are “generally not appropriate” in the context of mitigation activities and would require special prior approval from HUD to be considered.)<sup>1</sup>

HUD has recognized that the most effective mitigation strategies are regional in scale. For this reason, HUD waived the requirements at 24 CFR 570.483(b)(5), which limits the circumstances under which planning activities may meet a low- to moderate-income national objective. Instead, FloridaCommerce is required to comply with 24 CFR 570.208(d)(4), which affirms that planning activities meet a National Objective.

GPS applicants will be required to identify the entire area (non-LMI and LMI) that will benefit from the proposed project. FloridaCommerce will then utilize HUD guidance to calculate the LMI benefit percentage of each project.

As required by the Federal Register, Vol. 84, No. 169, the state will designate at least 50% (\$316,742,500) of the CDBG-MIT allocation to address mitigation and resiliency needs in the HUD-identified MID areas. The remaining 50% may be spent on state- identified MID areas that were declared disaster areas eligible for both FEMA Individual and Public Assistance, categories A - G.

**Figure 4** is a map of HUD and State-designated MID areas.

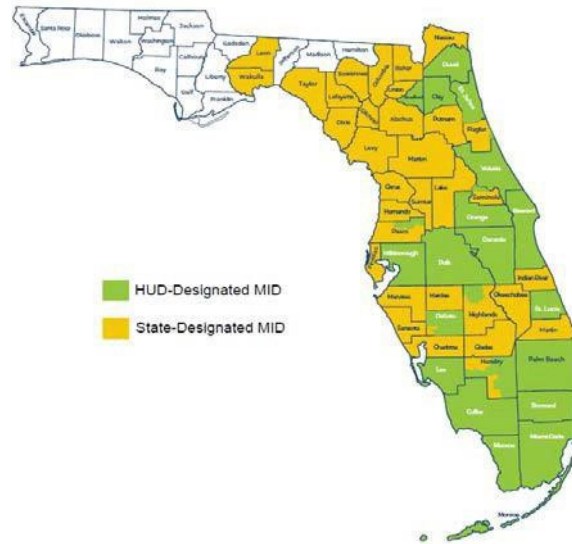


Figure 4: Mitigation HUD and State MID Areas

## 2.11 Program Management

FloridaCommerce is the agency responsible for the administration of mitigation funds allocated to activities in Florida. The CDBG-MIT program is funded by HUD under Public Law 115- 123.

FloridaCommerce will execute subrecipient agreements with selected applicants, who will complete projects and/or deliver services. Subrecipients must certify that they have, or will develop and maintain, the capacity to carry out mitigation activities in a timely manner and that they have reviewed the requirements of 84 FR 45838-45871. The program contact *for subrecipients only* is:

Attention: Mitigation Team

<sup>1</sup> Federal Register – 6109-N-02, V.A.13.f.

Office of Long-Term Resiliency  
Florida Department of Commerce  
107 East Madison Street  
Caldwell Building, MSC 400  
Tallahassee, FL 32399-2100  
(833) 347-7863  
[cdbg-mit@commerce.fl.gov](mailto:cdbg-mit@commerce.fl.gov)

## 2.12 Equal Opportunity

Federal policies ensure that no person be excluded, denied benefits or subjected to discrimination on the basis of race, color, national origin, sex, disability or age under any program funded in whole or in part by CDBG-MIT funds. FloridaCommerce and subrecipients may not discriminate in any of the following areas: deciding who will be admitted, or have access, to any CDBG-MIT funded program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

FloridaCommerce requires any entity receiving assistance through CDBG-MIT grant to comply with the Part 3 requirements herein. In addition, FloridaCommerce and subrecipients must administer and fund programs that are in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations, and will affirmatively further fair housing.

FloridaCommerce requires subrecipients to certify that they have adopted and are enforcing policies that:

- 1) prohibit the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations and

- 2) prohibit physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

Any person who believes he or she, or any specific class of individuals, has been subjected to unlawful discrimination may file a complaint regarding the alleged discrimination with:

Office for Civil Rights  
Florida Department of Commerce  
107 East Madison Street  
Caldwell Building, MSC 150  
Tallahassee, FL 32399-4129  
(850) 921-3205  
[Civil.Rights@commerce.fl.gov](mailto:Civil.Rights@commerce.fl.gov)

Atlanta Regional Office of FHEO  
U.S. Department of Housing and Urban Development Five Points Plaza  
40 Marietta Street, 16<sup>th</sup> Floor  
Atlanta, GA 30303-2806



(404) 331-5140

[ComplaintsOffice04@hud.gov](mailto:ComplaintsOffice04@hud.gov)

Further information about eligibility for filing an equal opportunity complaint, time limits, instructions, and procedures may be found at:

<http://www.floridajobs.org/office-directory/office-for-civil-rights/about-our-services/discrimination-complaints>.

## 2.13 Conflict of Interest

State officials and employees, FloridaCommerce employees, subrecipients, contractors and consultants who exercise functions with respect to CDBG-MIT activities or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, are prohibited from receiving any benefit from the activity either for themselves or for those with whom they have family or business ties, during their tenure. For purposes of this section, “family” is defined to include parents (including mother-in-law and father-in-law), grandparents, siblings (including sister-in-law and brother-in-law) and children of an official covered under the conflict of interest regulations at 24 CFR 570.489(h).

Per 24 CFR 570.489(h)(2) - Conflicts prohibited: Except for eligible administrative or personnel costs, the general rule is that no one who exercises or has exercised any functions or responsibilities with respect to CDBG-MIT activities assisted under this subpart or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Per 24 CFR 570.489(h)(4) - An exception to the conflict of interest provision may be granted after it is determined that such an exception will serve to further the purpose of the Act and the effective and efficient administration of the program or project of the state or unit of general local government as appropriate. An exception may also be granted should it be determined that all of the concerns generated by the potential conflict of interest have been adequately and publicly addressed and that an exception would serve to further the purposes of Title I of the Housing and Community Development Act of 1974 and the effective and efficient administration of the program. No party will enter into a conflict of interest until a request for an exception has been granted by FloridaCommerce.

## 2.14 Anti-Fraud, Waste and Abuse

HUD requires policies to prevent fraud, waste and abuse. FloridaCommerce is committed to aggressively detecting and eradicating fraud, waste, and abuse to ensure that FloridaCommerce- administered programs provide services to customers effectively and efficiently and that taxpayer funds are protected. Each employee, customer and partner has a role and responsibility to ensure that program and service delivery is in compliance with local, state and federal laws and policies and that any incidents are reported immediately for investigation and resolution.

Rebuild Florida constituents, employees and contractors may report suspected fraud, waste, or abuse by contacting Constituent Management Services staff, submitting information via the Report Fraud, Waste or Abuse online form (<http://floridajobs.org/rebuildflorida/report>; (all contact information fields are optional to allow for anonymity) or by sending an e-mail to [cdbg- dr\\_antifraudwasteabuse@commerce.fl.gov](mailto:cdbg-dr_antifraudwasteabuse@commerce.fl.gov)

All suspected cases of fraud will be taken seriously, and complaints will be reported to OLTR’s Compliance and Reporting Manager and FloridaCommerce’s Office of the Inspector General at [OIG@commerce.fl.gov](mailto:OIG@commerce.fl.gov). If FloridaCommerce’s OIG determines that it is appropriate, it will coordinate its investigation with agencies such as the Florida Office of the Inspector General, the Florida Office of the Attorney General, or the Florida Department of Business and Professional Regulation.

All substantiated cases of fraud, waste, or abuse of government funds will be forwarded to the United States Department of Housing and Urban Development (HUD), Office of Inspector General (OIG) Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)) and FloridaCommerce's HUD Community Planning and Development (CPD) Representative. *OLTR must provide a timely response within 15 working days of the receipt of a complaint, as stated in 84 FR 169.*

Office of Long-Term Resiliency's comprehensive Anti-Fraud Waste and Abuse Policy can be found [here](#).

## 2.15 Files, Records and Reports

FloridaCommerce and subrecipients will maintain accurate files and records on its projects and FloridaCommerce will retain all pertinent documentation for the grant between HUD and FloridaCommerce. Compliance will be maintained in accordance with the reporting requirements as outlined in the FloridaCommerce Policies and Procedures Manual (at [www.floridajobs.org/rebuildflorida/mitigation](http://www.floridajobs.org/rebuildflorida/mitigation)).

All official records on project activities are maintained for a five-year period beyond the date of grant closeout.

## 2.16 Public Records

The Office of Long-Term Resiliency's Constituent Services Manager will act as a Public Record Division Liaison and is the primary contact for all public record requests regarding the Office of Long-Term Resiliency/Rebuild Florida Program. The Office of Long-Term Resiliency's Public Record Division Liaison will coordinate with the respective managers of each program to determine (1) what is and what is not a responsive record; and (2) where to find all responsive records.

Pursuant to Article 1, Section 24, Florida Constitution, and Chapter 119, Florida Statutes, FloridaCommerce is subject to Florida's public records laws. Accordingly, unless an exemption exists, all records produced or received pursuant to law or in connection with the official business of FloridaCommerce can be requested and provided for inspection. Subrecipients participating in the GPS are also subject to Florida's public records laws. All public records requests made to FloridaCommerce will be processed in accordance with FloridaCommerce Administrative Policy 1.06, Processing Public Records Requests. Public records held by subrecipients may be requested by contacting the relevant subrecipient.

Detailed guidance on public records requests can be found in the following resources: Florida Government in the Sunshine Manual:

[http://myfloridalegal.com/webfiles.nsf/WF/RMAS-9UPM53/\\$file/2015SunshineLawManual.pdf](http://myfloridalegal.com/webfiles.nsf/WF/RMAS-9UPM53/$file/2015SunshineLawManual.pdf)

Florida Public Records Law, Chapter 119, Florida Statutes:  
[http://www.leg.state.fl.us/statutes/index.cfm?App\\_mode=Display\\_Statute&URL=0100-0199/0119/0119.html](http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0100-0199/0119/0119.html)

## 2.17 Section 3

The Housing and Urban Development Act of 1968, Section 3, mandates that recipients of CDBG-MIT funding provide, to the greatest extent possible, training, employment, contracting and other economic opportunities to low and very low-income persons or business concerns that provide economic opportunities to LMI persons.

The Section 3 numerical goals are minimum targets that must be reached for HUD to consider a recipient in compliance. If an entity fails to fully meet the Section 3 numerical goals, it must adequately document the efforts taken to meet the numerical goals. The minimum numerical goal for employment is 30% of the aggregate number of new hires must be Section 3 residents, annually; i.e., three out of 10 new employees needed to complete a Section 3 covered project / activity must be Section 3 residents. The minimum goals for contracting are:

- 10% of the total dollar amount of all Section 3 covered contracts for building trades work for maintenance, repair, modernization or development of public or Indian housing or building trades work arising in connection with housing rehabilitation, housing construction and other public construction, must be awarded to Section 3 businesses; and
- 3% of the total dollar amount of all non-construction Section 3 covered contracts must be awarded to Section 3 businesses.

## 2.18 Environmental Review

All CDBG-MIT and related activities are subject to the provisions of the National Environmental Policy Act of 1969 (NEPA), as well as the HUD environmental regulations provided in 24 CFR part 58. The primary purpose of these regulations is to protect and enhance the quality of the natural environment. In accordance with 24 CFR 58.34(a), the activities associated with GPS projects are exempt from environmental review. However, the subrecipient must document in writing its determination that each project is exempt and meets the conditions specified for such an exemption under 24 CFR 58.34(a).

FloridaCommerce currently has staff that will oversee environmental compliance. Additionally, the current staff may be augmented by external vendors procured through competitive solicitation.

## 2.19 Program Income

This program will not create program income.

## Part 3 Subrecipient Information

FloridaCommerce will use a subrecipient model to deliver the GPS. Subrecipients will be selected through a competitive RFA process. This program is not a direct grant program. No funds will be paid directly to individuals.

### 3.1 Eligibility

Entities that are eligible to apply include:

- Units of General Local Government (UGLG);
- Educational Institutions;
- State agencies; and
- Non-profits.

To be eligible for funding, a grant application must:

1. Be in conformance with the State Mitigation Plan and Local or Tribal Mitigation Plan approved under 44 CFR part 201.4; or for Indian Tribal governments acting as grantees, be in conformance with the Tribal Mitigation Plan approved under 44 CFR 201.7;
2. Have a beneficial impact upon the designated MID area, even if located outside the designated area;
3. Be cost-effective and result in an actionable plan that will provide strategies for high-impact mitigation activities.
4. Meet public notice requirement. (See Section 3.5, Public Notice Requirement.)

### 3.2 Request for Applications

The application submission cycle for GPS funding will open on May 15, 2020 and will end on July 31, 2020. Application registration will open on May 8, 2020 and will remain open throughout the submission cycle. To register, applicants should open this link: [floridajobs.org/rebuildflorida/mitigation](http://floridajobs.org/rebuildflorida/mitigation) and click "Application Packet". A contact name and email address will be requested. Once registered, the applicant will be emailed an individualized application weblink. The application packet will be available from the CDBG-MIT website beginning on May 15, 2020.

### 3.3 Application Process

Eligible applicants will be invited to submit applications proposing GPS projects for funding through the CDBG-MIT program. Responses will be evaluated to ensure the proposed projects meet the minimum criteria as outlined in the application materials provided in Appendices A - C of these Guidelines. Responses that meet minimum threshold requirements will then be evaluated according to the scoring criteria listed in Part 4. The following appendices are included in these Guidelines:

- Appendix A – Application Form
- Appendix B – Application Instructions and Checklist
- Appendix C – Completed Sample Application

### 3.4 Application Requirements

Applications must, at a high level\*, describe the plan being proposed and address how and why it needs to be created, updated, or integrated to mitigate risks attributable to threats identified in the State of Florida Action Plan Risk-Based Mitigation Needs Assessment. Plans must also include a proposed

budget with a detailed description of anticipated costs by category, including support services and program management and administration.

\*Application requirement *specifics* are delineated in Part 4 of these Guidelines and in Appendices A – C.

Responses may include proposed subrecipient partnerships with public, private or non-profit entities to deliver GPS projects. If an applicant intends to utilize a partnership to complete a project, the response must document how partners will be selected. Any entity that is listed as excluded, debarred or suspended on the System for Award Management (<https://sam.gov/SAM/>), including affiliated businesses with the same Employer Identification Number (EIN), is not eligible to receive GPS funds and may not be selected as a subrecipient, partner, subcontractor or vendor.

Applications will be evaluated to determine the mitigation value and cost effectiveness of the proposed project. An applicant's planning strategy and management capacity must be evident.

### 3.5 Public Notice Requirement

Eligible entities (such as UGLGs, nonprofits and educational institutions) must receive public input on their application by abiding by one or both of these new notice formats:

1. **Post** information about the project online: Post the information about your project to your public website and allow for a 14-day public comment period. State the type/s of project/s to be undertaken, the source, the amount of funding available for the activities, the date by which comments must be made, and a contact person for a copy of the proposed application.
2. Host a virtual public meeting: Applicants should supply the same documentation that would normally be required to demonstrate that a meeting was held, including minutes and a public meeting notice. The notice should be posted in a newspaper of general circulation and to your entity's website. State the type/s of project/s to be undertaken, the source, the amount of funding available for the activities, the date by which comments must be made, and a contact person for a copy of the proposed application. Applicants must provide for a 10-day comment period, which must be published prior to the submission of the application.

Evidence of the public notice must meet the following requirements:

- Documentation of newspaper advertisement.
- Print-out of entity webpage showing public notice.
- Documentation that the needs of non-English speaking citizens have been met wherever a significant number of non-English speaking citizens might be reasonably expected to participate. In this case, documentation will need to be translated into Spanish and Creole.

Evidence of a public meeting with city and tribal governments must meet the following requirements:

- Notice of the public meeting must be provided at least five days prior to the meeting.
- Documentation of a meeting must include sign-in sheets and minutes.

Instructions for providing evidence of meeting this public notice requirement are included in Appendix B, Application Requirements & Checklist.

### 3.6 Applicant Review Process Responsiveness

During the application review process, applicants are required to respond in a timely manner to FloridaCommerce requests for information/materials to complete the evaluation process. Any request for additional information will include a definitive due date for return of requested information. If the applicant needs an extension, a clarification or assistance, the applicant may make its request within the allotted response timeframe. If an applicant fails to provide the requested information/materials or fails to ask for an extension or assistance, the applicant's response will be closed and disqualified.

## Part 4 Scoring

### 4.1 Award Determination

FloridaCommerce will apply a two-phase process to review applications:

1. Phase One: Applications will first be evaluated for Mandatory Threshold Compliance Criteria, Table 5. This phase is unscored. FloridaCommerce will further review only the applications that pass Phase One.
2. Phase Two: If the Mandatory Threshold Criteria is in compliance, the second phase of the review process will be initiated. Applications will be reviewed and scored based on **Scoring Criteria Evaluation Rubric, Table 6.**

Only the application itself (including requested attachments) will be scored. Any documents submitted with the application *that were not requested* will not be scored. The evaluation team will consist of CDBG-MIT staff who will independently and objectively score applications consistent with the Scoring Criteria Evaluation Rubric. The reviewers' scores will be averaged to determine a final score for each application.

Each element of the Scoring Criteria Evaluation Rubric has a value associated with it. A potential maximum of 100 points may be awarded. If eligible responses exceed available funding, applicants will be funded in rank order based on evaluation scores. FloridaCommerce reserves the option to fund all, a portion of or none of each application submitted by an applicant.

Applicants will be notified that their application was submitted successfully via email.

**Table 5: Mandatory Threshold Compliance Criteria**

Threshold Criteria – Part A
Application is signed and complete.
Application was submitted on time.
Applicant is an eligible UGLG, educational institution, state agency, or non-profit.
Applicant's project benefits HUD and/or state-identified MID areas.

**Table 6: Program Scoring Evaluation Rubric**

Available Points	Scoring Categories	Evaluation Rubric
25 pts	Project Description	Write an overview/summary, not to exceed 2,500 words, of the project being proposed. 1) State the project purpose, area of benefit and a description of the proposed activity. 2) Specify the risk(s) that will be mitigated by completion of this project. 3) Describe how the work will be done and the team that will do it. 4) Explain the method used to determine project funding requirements. 5) Describe anticipated outcomes. 6) Has a comprehensive plan already been created? If yes, describe how the proposed plan or activity will integrate with the comprehensive plan and attach the Executive Summary of the comprehensive plan.

25 pts	Community Value	Describe, in 1,500 words or less, the proposed activity’s value to the community in normal circumstances and in times of natural disasters. Include: The community lifelines served this project; How the project enhances community resilience; Public notice of the planned project; and Community involvement in the project planning process.
20 pts	Capacity Plan	Provide a strategic plan overview of 1,500 words or less that addresses goals, stakeholders, the work plan, (major tasks and deliverables), resources (staffing and budget) and monitoring/quality controls. Identify the staff members who will be responsible and/or positions that will be filled for the GPS project management and maintenance. Provide a short profile on each person on your current staff who perform project-related tasks and a position description for any new hires who will be assigned to project work. If your project will require specific tools or skilled personnel, such as mapping do you have the capabilities and the staff to complete your plan? Attach a Word document with the planning team’s CV/resumes into the zip folder. Describe the circumstances under which this plan will be updated and detail how subsequent updates will be funded.
15 pts	Implementation Plan	Use the Implementation Plan Template provided in Appendix D to prepare a chronological timeline for the entire life of the project that organizes work into logical, manageable tasks and deliverables.
10 pts	Budget	Include your project budget using the Budget Worksheet provided as Appendix E. Ensure your budget is reasonable, appropriate and accurate. Are the budgeted items consistent with the project description and tasks? Does the amount requested fall within the GPS’s allowable minimum (\$20,000) and maximum (\$10,000,000)? Ensure there is no duplication of benefits.
5 pts	Leveraged Dollars	If your project involves the qualified use of matching or leveraged funds or services, describe the specifics of leveraged fund/service usage. Are there local or other funds available to address the proposed project in whole or in part? If yes, report all sources of funding and the amount available. Disclose sources and uses of non CDBG-MIT funds. What other federal, state and/ or local entities have you contacted concerning funding for the proposed project and what were the results?
100 pts		Total maximum score

## 4.2 Technical Assistance

FloridaCommerce is hosting a webinar, 20-minute and one-on-one phone calls to provide an overview of these Guidelines and the application process. In addition, designated partners will provide technical assistance to subrecipients related to CDBG-MIT requirements and compliance. Assistance will also be provided as a result of monitoring activities and at subrecipient request.

## 4.3 Subrecipient Responsibilities

Subrecipients have the following responsibilities and must:

- Submit an accurate account of how the absence of a plan has affected the community;

- Submit a detailed scope of work;
- Enter into a subrecipient agreement with FloridaCommerce specific to the GPS;
- Comply with all terms and conditions of the subrecipient agreement, GPS guidelines, Mitigation Action Plan and applicable federal, state and local laws;
- Develop policies and procedures to detect and prevent fraud, waste and abuse that describe how the subrecipient will verify the accuracy of information and report instances of suspected fraud, waste or abuse;
- Follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486;
- Develop policies and procedures for complaints and grievances and for appeals. These policies and procedures must be made available to participants and participant applicants;
- Update application or program policies and procedures upon FloridaCommerce request;
- Document all complaints, grievances and appeals received. To comply with HUD requirements, a response to each complaint, grievance or appeal must be made within 15 working days of receipt;
- Maintain organized files and make them accessible to FloridaCommerce or its representatives upon request;
- Maintain books, records and documents relating to the GPS in accordance with generally-accepted accounting procedures and practices which sufficiently and properly reflect all expenditures of funds provided by FloridaCommerce under this program. All records must be maintained for five years beyond the closeout of the grant;
- Retain sufficient records to document program activities, participants and services and to demonstrate compliance with the GPS Program Guidelines, subrecipient agreement and applicable federal, state and local laws and regulations. All records must be maintained for five years beyond the closeout of the grant;
- Ensure that any partners, subcontractors, vendors or other entities to whom the subrecipient intends to disburse GPS funds are not listed as excluded, debarred, or suspended on the System for Award Management (<https://sam.gov/SAM/>), including affiliated businesses with the same EIN;
- Comply with the requirement that subrecipients will not carry out any of the activities under their agreement with FloridaCommerce in a manner that results in a prohibited duplication of benefits as defined by Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974;
- Provide a detailed timeline for implementation consistent with the milestones outlined in these Program Guidelines and report actual progress against the projected progress on a monthly basis;
- Provide a quarterly report to FloridaCommerce that outlines the activities completed in the previous quarter.
  - The report must include financial metrics that demonstrate the implementation costs to date with projected spending.
  - Reporting must include documentation of the number of complaints received, the nature of the complaint, and that complaint was responded to within 15 days of receipt.
  - Additional quarterly reporting requirements may be required, depending on the specific program design implemented by a subrecipient.
- Provide a monthly report to FloridaCommerce that details the grant funding approved versus funding disbursed; and
- Monitor compliance with the terms and conditions of the subrecipient agreement.



## 4.4 Compliance and Monitoring of Subrecipients

As a recipient of federal funds, FloridaCommerce is charged with ensuring that any subrecipient has the capacity and means to deliver projects and services and that the costs of its activities are allowable, reasonable and necessary. Therefore, each subrecipient assessed by FloridaCommerce must demonstrate the organizational capacity and implementation experience necessary to deliver services. Each subrecipient must meet performance metrics for implementation. Additionally, all subrecipients will be subject to routine monitoring and compliance review by FloridaCommerce or its representatives based on an initial risk analysis. Monitoring will include:

- Evaluation of the Subrecipient's organization, procurements, policies and procedures;
- Compliance with the Stafford Act;
- Allowable, necessary and reasonable cost standards;
- Financial management, file management and documentation;
- National objective compliance; and
- Reporting and compliance with these Guidelines, the Subrecipient Agreement and any applicable laws and regulations.

FloridaCommerce will monitor the GPS directly and through designated partners. This includes verification of official documents against state records, review of application materials and expense documentation, and physical site visits to verify compliance and appropriate use of funds. Additional reviews may be conducted by HUD. Monitoring reviews may be announced or unannounced. Monitoring may take place on site or remotely. Reviewed documentation may be randomly selected. Project applications and documentation must be maintained and made available by subrecipients. All monitoring results will be recorded in detail for program compliance and use of funds.

Any issues of non-compliance may be categorized as either findings or observations. Subrecipients found to be non-compliant, or who received funds in error, may be required to repay grant funds to the state of Florida, in accordance with the subrecipient agreement.

## 4.5 Appeals

### 4.5.1 Informal Appeals

Appeals may be filed only upon the deliverance of an adverse program decision regarding eligibility, benefits, or closure of an application. Appeals must be filed within the parameters set by this appeals procedure. Participants may not appeal program policy. If an applicant is denied program services or benefits and desires to appeal, an appeal may be filed with FloridaCommerce as follows:

- All appeal letters must be submitted in writing within 30 days of the date of the denial letter via:
  - U.S. mail to:

Attention: Office of Long-Term Resiliency, Appeals Team

Florida Department of Commerce

107 East Madison Street

Caldwell Building, MSC 400

Tallahassee, FL 32399

- Email to: [cdbg-drappeals@commerce.fl.gov](mailto:cdbg-drappeals@commerce.fl.gov)
- All appeal letters must include:
  - The reason for the appeal;

- A clear explanation that describes the evidence that the denial was contrary to applicable laws or regulations or in some other way inequitable;
- The reason that the applicant is eligible for the service or benefit that was denied, delayed, reduced, modified or terminated;
- The proposed remedy sought by the applicant;
- Name, contact address and contact telephone number of entity filing appeal; and
- Signature and date.

An appeal initiated by an applicant with FloridaCommerce must follow written appeal procedures, which may include, but not be limited to, informal hearings, third-party review or administrative review. A determination letter will be sent, post-appeal, to the entity that initiated the appeal. Applicants may contact FloridaCommerce for more information on the appeal procedure.

## 4.5.2 Formal Appeals /Notice of Administrative Rights

Any person whose substantial interests are affected by FloridaCommerce's determination has the opportunity for an administrative hearing pursuant to section 120.569, Florida Statutes. For the required contents of a petition challenging agency action, refer to rules 28- 106.104(2), 28-106.20(2), and 28-106.301, Florida Administrative Code.

Depending on whether material facts are disputed in the petition, a hearing will be conducted pursuant to either sections 120.569 and 120.57(1), Florida Statutes, or sections 120.569 and 120.57(2), Florida Statutes. Pursuant to section 120.573, Florida Statutes, and Chapter 28-106, Part IV, Florida Administrative Code, mediation is available to settle administrative disputes. Any petition must be filed with the Agency Clerk within 30 calendar days of receipt of FloridaCommerce's determination

If an applicant files a request for reconsideration or informal appeal, the requirement to timely file a petition challenging agency action will be tolled until a decision under either method is rendered by the Department. At that time a new appeal window will begin. No applicant will lose their rights under Chapter 120, Florida Statutes, by filing a request for reconsideration or request for informal appeal.

Any petition must be filed with the Agency Clerk within 30 calendar days of receipt of this determination. A petition is filed when it is received by:

Attention: Agency Clerk  
Department of Commerce  
Office of the General Counsel  
107 East Madison Street,  
Caldwell Building, MSC 110  
Tallahassee, Florida 32399-4128

Fax: (850) 921-3230

Email: [Agency.Clerk@commerce.fl.gov](mailto:Agency.Clerk@commerce.fl.gov)

## Part 5 Financial

### 5.1 Eligible & Ineligible Costs

All costs must be CDBG-MIT eligible. All costs must comply with the requirements of 24 CFR 570 and 2 CFR 200.

Eligible costs for the GPS include, but are not limited to:

- Resources related to GPS activities;
- Participant outreach; and
- Program management and administration. Ineligible costs for the GPS include, but are not limited to:

Ineligible costs for GPS include, but are not limited to:

- Material or supply costs unrelated to GPS activities;
- Costs not associated with the development of plans or planning activities;
- Furnishings and personal property, including motor vehicles and fixtures;
- Costs incurred prior to the date of execution of a subrecipient agreement;
- Political activities or lobbying;
- Payments to a for-profit business while that business or business owner is the subject of unresolved findings for non-compliance with CDBG assistance;
- Construction, engineering, and other costs associated with a specific plan; or
- Any costs determined as unallowable or ineligible pursuant to applicable state or federal laws or regulations, or guidance from HUD, FloridaCommerce or any applicable state or federal agency.

### 5.2 Funding Method

Funding will be provided monthly on a cost reimbursement basis upon completion of agreed upon deliverables. Subrecipients must verify all documentation and costs before submission for cost reimbursement to FloridaCommerce. Subrecipients must provide required reporting and supporting documentation to be reimbursed.

### 5.3 Supplanting Funds

Subrecipients must agree to utilize GPS funds to supplement rather than supplant funds otherwise available. Subrecipients must document that GPS funds awarded are above and beyond any annual appropriations that are provided for the same purpose. GPS funds may be utilized after all other funds available to provide benefits to the participant for the same purpose have been expended. Any supplanting of funds will be treated as a duplication of benefits or fraud, waste and abuse, and is subject to recapture under the terms of the subrecipient agreement.

### 5.4 Duplication of Benefits (DOB) Overview

Eligible applicants may have previously received assistance from other sources for the same purpose as the GPS. Under the requirements of The Robert T. Stafford Disaster Assistance and Emergency Relief Act, as interpreted and applied by HUD, FloridaCommerce, and its subrecipients must consider certain aid received by a person or entity in determining the amount of assistance which can be granted. FloridaCommerce and subrecipients must follow HUD's DOB Guidance. Applicants must provide any information on benefits received that may create a DOB to the appropriate subrecipient. The subrecipient must perform due diligence verification of DOB information.

The Supplemental Appropriations Act authorizing CDBG-MIT funding and the Stafford Act include restrictions on using CDBG-MIT program funds to provide assistance when insurance providers or other federal or state entities have already funded all or a portion of the activity. The Stafford Act also contains eligibility requirements for recipients who have received prior disaster funding based upon whether they are in compliance with requirements associated with receipt of those funds. When applicable, recipients must be in compliance with these restrictions or funding will be denied. Participants must report all financial assistance, including:

- Local, state, or federal programs;
- Private or non-profit charitable organizations; and
- Any other assistance received for the purpose for which the participant is applying for, and receiving, funding or services.

Funds provided by any federal, state or local government entity, or non-profit or private source intended for the same purpose as the GPS are considered a DOB and under federal law *must* be deducted from the assistance provided by the GPS. Any additional funds paid to participants for the same purpose as the GPS after the GPS services are completed *must* be returned to FloridaCommerce. Participants in the GPS must agree to repay any duplicative assistance considered a DOB.

## 5.5 Subrogation

Subrogation is a legal doctrine that allows one person to take on the rights of another. In the context of mitigation grants, a GPS participant must enter into a subrogation agreement in which the funding agency (FloridaCommerce) obtains the right to collect any additional mitigation payouts the participant receives for the same purpose after the participant has entered into a grant agreement for GPS benefits.

All duplicative funding received must be remitted to or accounted for by the program, regardless of when it is received by the entity. If an entity receives additional funding for the same purpose as the GPS award, including after the GPS award is executed or GPS services are completed, the entity is required to report the additional funding to the program.

By accepting the award, subrecipients agree that they will report any duplicative funds to the program whenever received. Upon receipt of a report that additional benefits have been received, the program will recalculate the entity's award and provide instructions as to whether the award will be reduced by such amount, or whether the entity must remit such amounts to the program as reimbursement (when additional assistance received after program disbursements). Each subrecipient will execute and be bound by a subrogation agreement.

Subrecipients must agree to subrogate (commit to the state of Florida) any future payments they may receive after award from any sources that represent a potential DOB. The subrogation agreement requires the applicant to notify FloridaCommerce if additional funds are received and to assist FloridaCommerce in collecting any amounts owed to it from these sources. All parties shall comply with standard anti-fraud measures.

FloridaCommerce will exercise all normal due diligence in collection of amounts owed through contact with awardees and will pursue investigation and collection efforts which may include demand letters, small claims court, filing of judgments, and/or other collection activity. Collection activity following demand letters will be determined in consultation with FloridaCommerce and/or the Florida Attorney General's Office.

## 5.6 Budget

CDBG-MIT funds may be used to meet the local share of a matching requirement, or of cost-sharing or other contribution for federal or state grant programs if the funds are used to carry out an eligible GPS mitigation activity. Funds may be matched from mitigation grants administered by FEMA and the United

States Army Corps of Engineers. (The maximum amount for the US Army Corps of Engineers is \$250,000.) Activities that are funded with match dollars must meet the eligibility requirements of the CDBG-MIT program and the federal program that is being supported with CDBG-MIT funds.

Applicants should describe how they will seek to maximize the outcomes of investments and the degree to which CDBG-MIT funds will be leveraged, including through public- private partnerships and other federal, state, local, private and nonprofit sources to generate more effective and comprehensive mitigation outcomes. Leveraged funds for each activity must be identified in the Disaster Recovery Grants Reporting system.

Although there is not a requirement for local match, Planning Grants may or may not cover the full cost of all planning activities for future projects. Applicants should expect to contribute resources to the planning process in order to develop a successful project.

## 5.7 Procurement Requirements

Federal, state and local procurement rules apply when purchasing services, supplies, materials or equipment. FloridaCommerce and all subrecipients must abide by the procurement process mandated by federal and state government codes as they are applicable to the GPS. The procurement process includes the decision to purchase as well as the process to complete the purchase.

The federal government has established a set of procurement rules in 2 CFR Part 200 that apply to CDBG-DR projects. 24 CFR 570.502 requires compliance with 2 CFR Part 200 for CDBG-DR projects, with certain limited exemptions (see also 24 CFR 85.36 and 24 CFR 84.40-48, as applicable). These rules are in place to ensure that federal dollars are spent fairly and encourage open competition for the best level of service and price. If a conflict between federal and local procurement regulations should occur, the more stringent regulation will be followed.

# Appendices

## Appendix A – Application Form



Date:

<b>Rebuild Florida CDBG - Mitigation General Planning Support Program Application</b>					
<b>Official Project Title</b>					
<b>Applicant Information</b>					
Official Applicant Entity Name				FEIN #	
Primary Project Contact Name: Title				DUNS #	
Mailing Address			E-mail		
City				Phone Number:	
	State:			Zip Code	
Please list co-applicant entities if any:		Contact Person:		E-mail Address:	
<b>Project Description (2,500 word limit)</b>					
Write an overview/summary of the project being proposed: 1) State the project purpose, area of benefit and a description of the proposed activity. 2) Specify the risk(s) that will be mitigated by completion of this project. 3) Describe how the work will be done and the team that will do it. 4) Explain the method used to determine project funding requirements. 5) Describe anticipated outcomes. 6) Has a comprehensive plan already been created? If yes, describe how the proposed plan or activity will integrate with the comprehensive plan and attach the Executive Summary of the comprehensive plan.					
Insert Attachment:			Please title zip folder: EntityNamePD_GPS		
<b>Community Value (1,500 word limit)</b>					

Describe: The project’s value to the community in normal circumstances and in times of natural disasters. Include: The community lifelines served this project; How the project enhances community resilience; Public notice of the planned project; and Community involvement in the project planning process.

Insert Attachment:		Please title doc: EntityNameCV_GPS
--------------------	--	------------------------------------

<b>Capacity Plan (1,500 word limit)</b>	
<p>Provide a strategic plan overview that addresses goals, stakeholders, the work plan, (major tasks and deliverables), resources (staffing and budget) and monitoring/quality controls. Identify the staff members who will be responsible and/or positions that will be filled for the GPS project management and maintenance. Provide a short profile on each person on your current staff who perform project-related tasks and a position description for any new hires who will be assigned to project work. If your project will require specific tools or skilled personnel, such as mapping do you have the capabilities and the staff to complete your plan? Attach a Word document with the planning team’s CV/resumes into the zip folder. Describe the circumstances under which this plan will be updated and detail how subsequent updates will be funded.</p>	
Insert Attachment:	Please title zip folder: EntityNameCP_GPS

<b>Implementation Plan</b>	
<p>Use the Implementation Plan Template provided in Appendix D to prepare a chronological timeline for the entire life of the project that organizes work into logical, manageable tasks and deliverables.</p>	
Insert Attachment:	Please rename template: EntityNameIP_GPS

<b>Budget</b>					
<p>Include your project budget using the Budget Worksheet provided as Appendix E (and in the GPS Application, Appendix A). Ensure your budget is reasonable, appropriate and accurate. Are the budgeted items consistent with the project description and tasks? Does the amount requested fall within the GPS’s allowable minimum (\$20,000) and maximum (\$10,000,000)? Ensure there is no duplication of benefits.</p>					
Insert Attachment:	Please rename template: EntityNameBudget_GPS				
Is there any duplication of benefits?	<table border="1"> <tr> <td>Yes:</td> <td></td> <td>No:</td> <td></td> </tr> </table>	Yes:		No:	
Yes:		No:			
<p>All funds identified for use on your project must be fully disclosed and detailed to ensure budget accuracy and no duplication of benefits.</p>					
Will funding – other than CDBG-MIT funding – be used to fund this project? If yes, detail the anticipated or committed funds in the Leveraged Dollars section.	<table border="1"> <tr> <td>Yes:</td> <td></td> <td>No:</td> <td></td> </tr> </table>	Yes:		No:	
Yes:		No:			



<b>Leveraged Dollars</b>			
<p>If your project involves the qualified use of matching or leveraged funds or services, describe the specifics of leveraged fund/service usage. Are there local or other funds available to address the proposed project in whole or in part? If yes, report all sources of funding and the amount available. Disclose sources and uses of non CDBG-MIT funds. What other federal state and/ or local entities have you contacted concerning funding for the proposed project and what were the results? Put "N/A" if this section is not applicable to your project.</p>			
<b>Compliance</b>			
<p>According to 84 FR 45838 August 30, 2019 Section V.A.(18), "The State shall make reviews and audits, including on-site reviews of any subrecipients, designated public agencies and local governments, as may be necessary or appropriate to meet the requirements of section 104(e)(2) of the HCDA, as amended, as modified by this notice. In the case of noncompliance with these requirements, the State shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences, and prevent a recurrence. The State shall establish remedies for noncompliance by any designated subrecipients, public agencies, or local governments."</p>			
Can you certify to comply with state and federal register regulations as outlined in 84 FR 45838?	Yes:		No:
<b>Sign and Date</b>			
<p>As the primary entity contact for this project, I certify:</p> <p>A. All staff, contractors, vendors and community partners of our mitigation initiative:</p> <ol style="list-style-type: none"> <li>1. Will comply with all HUD and Florida requirements in the administration of the proposed CDBG-MIT funded activities;</li> <li>2. Will work in a cooperative manner to execute the Subrecipient Agreement that provides the pathway for successful CDBG-MIT program(s) and/or project(s) and;</li> </ol> <p>B. All information submitted in this Application is true and accurate.</p>			
Signature:	Date:		

Print button will only print application and not attached documents. Submit button will deliver application to email to the [cdbg-mit@commerce.fl.gov](mailto:cdbg-mit@commerce.fl.gov). Please attach all relevant documents to this email.

Print Application

Submit Application

# Appendix B – Application Instructions & Checklist

## Rebuild Florida GPS Checklist



Project Name: \_\_\_\_\_

This Checklist is designed to aid the applicant through the application process. As such, it does not need to be submitted with the completed application to FloridaCommerce.

✓	<b><u>Application Information Required</u></b>
	Application is signed, dated and complete.
	FEIN and DUNS numbers are provided.
	Application is from an eligible UGLG, state agency, or non-profit or non-governmental entity that applied in partnership with a UGLG or state agency.
	Project title, primary contact name, address and contact methods are provided.
	Project description clearly explains the plan or activity to be completed.
	Project description addresses which risks will be mitigated by the plan or activity.
	Community value clearly describes the community lifelines being served.
	Community value demonstrates how the plan or activity will enhance community resilience.
	Capacity plan identifies the goals, stakeholders, work plan, resources, and monitoring/quality controls for the plan or activity.
	Staff members and their responsibilities are identified.
	Contractors or third-party entities are identified.
	The Implementation Plan Template is completed and attached to the application.
	The Budget Template is completed and attached to the application.
	This project has no duplication of benefits.
	Leveraged funds/ service usage is outlined in the application.

## Filling out the Rebuild Florida GPS Application

### Applicant Information:

1. First write in the GPS project title under “Official Project Title”.
2. Under “Applicant Information”, fill in the official applicant entity name, meaning the primary UGLG, agency or entity who is applying for this program. Use your official entity name, as this will be the name used for disbursing funds.
3. Next fill in the primary project contact name, title, e-mail, mailing address, and phone number. This person will be the first individual to be contacted by FloridaCommerce regarding the proposed GPS project, should the need arise.
4. Be sure to fill in both the entity’s FEIN and DUNS number.
5. Lastly, if there are any other UGLG, agencies, or entities who are co-applicants for this proposed project, list their official entity name, person of contact name and email.

### Project Description:

1. Attach a word document titled: EntityNamePD\_GPS of the project overview that is not to exceed 2,500 words. An example of the document title being submitted by the Leon County City Fire Department would look like: LeonCountyFirePD\_GPS
2. Please see this link to create zip files: <https://support.microsoft.com/en-us/help/14200/windows-compress-uncompress-zip-files>

### Community Value:

In a zip folder, attach a Word document titled: EntityNameCV\_GPS of the overall community value of the proposed project without exceeding 1,500 words.

### Capacity Plan:

Provide a plan overview, not to exceed 1,500 words, that outlines your proposed GPS project. You will label the document titled: EntityNameCP\_GPS.

### Implementation Plan:

1. Use the provided Implementation Plan template found in Appendix D of the GPS Guidelines to fill out the information. Rename the template: EntityNameIP\_GPS.
2. You will fill out the timeline to outline the proposed project’s life, accounting for manageable tasks and deliverables with approximate dates included.

### Implementation Plan Template Instructions:

Enter project name, official applicant entity name and primary contact name and phone number in the header space at the top of the template.

This template is customizable to fit your project. Feel free to edit the segments and add notes when needed.

1. The box titled “GPS Implementation Plan Timeline” will display a visual timeline of the data that you enter into the “Tasks” box.
2. The “Tasks” box should list the major manageable tasks and deliverables of the proposed project and include the entire life of the project. Enter the approximate start and end dates of each task and/ or deliverable under the tabs “Start” and “End”. “Duration” encompasses the number of days the task runs for. Excel should already calculate the duration based on the start and end dates you enter. If this is not the case, enter in the number of days as the duration of each task and/ or deliverable. Label each task and/ or deliverable appropriately under the “Label” section.

- A. Within the “Tasks” box, there are 15 available slots for project timeline tasks. When adding/changing tasks within the box, select the row (select the values under “Start” to

Tasks				
Start	End		Duration	Label
02/03	03/03		29	DEO Award and Subrecipient Agreement
03/03	04/03		30	Example Plan1 Design
03/03	04/03		30	Example Plan2 Design
04/04	05/04		25	Mapping Upgrades
05/06	07/06		60	Community Outreach Phase 1
07/08	08/08		31	Community Outreach Phase 2
05/06	07/06		60	Building Codes Evaluation
07/08	08/08		31	Administrative Changes
08/20	09/01		12	Plan Implementation
09/01	12/25		115	Plan Updates
10/01	10/10		9	Sample Text
10/10	10/27		17	Sample Text
11/11	11/30		19	Sample Text
12/01	12/31		30	Sample Text
12/31	01/13		13	Sample Text

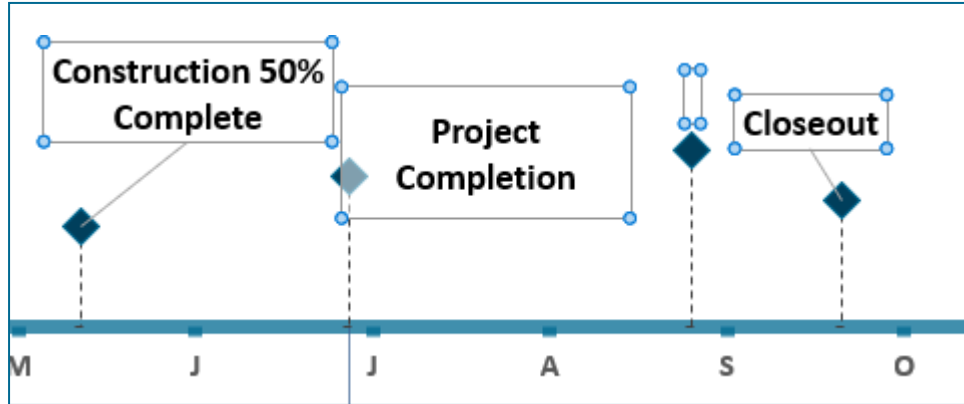
“Label”).

- B. For this example, the highlighted “Sample Text” task needs to be moved under the “Mapping Upgrades” cell. Once you select the row, right click, select “Cut”, and a dotted line around your selected row should appear. Next, select the “Community Outreach Phase 1” row. Right click and select “Insert Cut Cells”. Now “Sample Text” will appear under “Mapping Upgrades”. The visual timeline above the “Tasks” will also reflect these changes.

Tasks				
Start	End		Duration	Label
02/03	03/03		29	DEO Award and Subrecipient Agreement
03/03	04/03		30	Example Plan1 Design
03/03	04/03		30	Example Plan2 Design
04/04	05/04		25	Mapping Upgrades
10/01	10/10		9	Sample Text
05/06	07/06		60	Community Outreach Phase 1
07/08	08/08		31	Community Outreach Phase 2
05/06	07/06		60	Building Codes Evaluation
07/08	08/08		31	Administrative Changes
08/20	09/01		12	Plan Implementation
09/01	12/25		115	Plan Updates
10/10	10/27		17	Sample Text
11/11	11/30		19	Sample Text
12/01	12/31		30	Sample Text
12/31	01/13		13	Sample Text

Follow these guidelines for customizing your timeline. You may add lines within the “Tasks” section below existing tasks by highlighting the complete box rows, right click, select “Insert...”, a dialogue box will appear, select “Shift cells down”, select “Ok”. This will shift all boxes below the selected row down the excel sheet.

- The “Milestones” box may be used to list major project milestones such as the start or completion of the project. Any changes to this box can be made by following the directions described previously. The label for your new milestone may need to be added in manually. You can do this by clicking on one of the existing milestone texts in the visual timeline. For example, you may click “Closeout” above the diamond icon. All other text boxes for milestones should be outlined



by boxes.

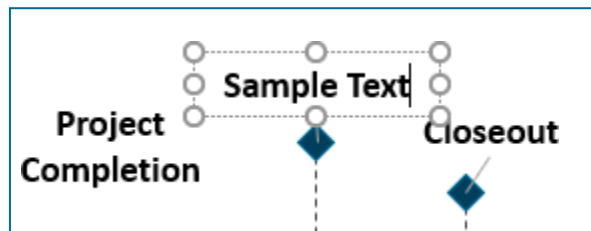
Next, select the box that does not have a label. Now enter in the label for this milestone.

You may move and change the size of each text box.

- The “Notes” box allows you to list any additional notes about the project timeline that may be necessary for FloridaCommerce to read.

**Budget:**

- Use the provided Budget Worksheet found in Appendix E of the GPS Guidelines to fill out the information. Rename the template with your EntityNameBudget\_GPS.
- Select either Yes/No to answer whether your project includes a duplication of benefits. Any project that includes a duplication of benefits will not be eligible for a CDBG-MIT program.
- Select either Yes/No whether you anticipate receiving any funds other than CDBG-MIT funds. If



the answer is yes, then in the “Leveraged Dollars” section you will need to detail any application for funds and when those funds will be committed for your project. Include the agency/ entity that is providing the funds and the total amount.

**Budget Template Instructions:**

Enter project name, primary contact name and phone number and the official applicant entity name.

This template is customizable to fit the budget proposal for your project. Feel free to edit left-hand segments and add notes when needed.

If a section does not have enough cells for the category that you are working on, you can add additional cells by highlighting a complete row and right clicking. A dialogue box will appear that permits you to add a row of cells. Click “Insert” and then select either “Insert Above” or “Insert Below”, depending on where you would like the new row to be placed. The new row will appear above or below the row you highlighted.

1. On the left-hand side of the template there is a list of major projects and related sub- groups. You may edit each of these areas to fit your proposed budget plan. For example, if you do not have Mitigation Activities, you may delete that row and the related subgroups.
2. List anticipated and committed sources of other project funding sources in the “Sources of Other Funds” category. These funds are non-CDBG-MIT funds. Include entities you have contacted, even if a funding commitment has not yet been made. Disclose the amount you requested or expect to receive. If you need to add rows in this section, follow the directions for adding rows outlined above.
3. You can use the right-side “Notes” column to elaborate on budgeted items as needed.

### **Leveraged Dollars:**

1. If you suspect your project includes the use of matching or leveraged funds or services, read the GPS Guidelines, Part 4.6 to ensure your project is eligible for this section.
2. Describe the specifics of leveraged funds or services that your project uses in the space provided. Identify and answer:
  - A. Are there local or other funds available to address the proposed project in whole or in part?
    - i. If Yes, report all sources of funding and the amount available.
  - B. Disclose sources and uses of non CDBG-MIT funds.
  - C. What other federal, state, and/ or local entities have you contacted concerning funding for the proposed project, and what were the results?
3. If your project does not involve matching or leveraged funds, then write “N/A” in this section.

### **Compliance:**

By selecting “Yes” in this section, you certify that your entity and co-applicants will comply with all FloridaCommerce and state requirements as outlined in 84 FR 45838.

### **Sign and Date:**

As the primary entity contact for this project, I certify that staff, contractors, vendors and community partners of our mitigation initiative:

1. Will comply with all HUD and Florida requirements in the administration of the proposed CDBG-MIT funded activities;
2. Will work in a cooperative manner to execute the Subrecipient Agreement that provides the pathway for successful CDBG-MIT program(s) and/or project(s) and;
3. Certify that all information submitted in this Application is true and accurate

### **Print and Submit Buttons:**

Select “Print” to print out your completed application. Attached files will not print with the application when selecting the “Print” button. Print all attached documents separately and mail the complete application to:

Attention: Rebuild Florida Mitigation Team

Florida Department of Commerce

107 East Madison Street

Caldwell Building, MSC 400

Tallahassee, FL 32399

## ***Mitigation General Planning Support Program Guidelines***

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Select "Submit Application" to have your application emailed directly to the Rebuild Florida Mitigation team at: [CDBG-MIT@commerce.fl.gov](mailto:CDBG-MIT@commerce.fl.gov). A dialog box will appear that will allow you to email the application and attach all required files.

If you have any questions or concerns, please email the Mitigation team at: [CDBG-MIT@commerce.fl.gov](mailto:CDBG-MIT@commerce.fl.gov)



Appendix C – Completed Sample Application Date: 05/15/2020



**Rebuild Florida CDBG - Mitigation  
General Planning Support Program Application**

**Official Project Title**  
Pensacola Stormwater Drainage Plan

**Applicant Information**  
City of Pensacola

Official Applicant Entity Name:	City of Pensacola			FEIN #	98-38475837
Primary Project Contact Name:	Peyton Wolf			DUNS #	11111111
Title:	City Planner	E-mail:	Peyton.Wolf@Pensacola.gov		
Mailing Address:	111 Main Street			Phone Number:	(800)555-5555
City:	Pensacola	State:	FL	Zip Code:	11111

Please list co-applicant entities if any:	Contact Person:	E-mail Address:
Escambia County	Maxwell Walsh	Maxwell.Walsh@escambia.gov
Northwest Florida Water Management District	Melissa Arline	Melissa.Arline@NorthwestFLWMD.com

**Project Description (2,500 word limit)**

Write an overview/summary of the project being proposed:

1) State the project purpose, area of benefit and a description of the proposed activity. 2) Specify the risk(s) that will be mitigated by completion of this project. 3) Describe how the work will be done and the team that will do it. 4) Explain the method used to determine project funding requirements. 5) Describe anticipated outcomes. 6) Has a comprehensive plan already been created? If yes, describe how the proposed plan or activity will integrate with the comprehensive plan and attach the Executive Summary of the comprehensive plan.

Insert Attachment:  Please title zip folder: EntityNamePD\_GPS

**Community Value (1,500 word limit)**

Describe: The project’s value to the community in normal circumstances and in times of natural disasters. Include: The community lifelines served this project; How the project enhances community resilience; Public notice of the planned project; and Community involvement in the project planning process.

Insert Attachment:		Please title doc: EntityNameCV_GPS
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<b>Capacity Plan (1,500 word limit)</b>		
<p>Provide a strategic plan overview that addresses goals, stakeholders, the work plan, (major tasks and deliverables), resources (staffing and budget) and monitoring/quality controls. Identify the staff members who will be responsible and/or positions that will be filled for the GPS project management and maintenance. Provide a short profile on each person on your current staff who perform project-related tasks and a position description for any new hires who will be assigned to project work. If your project will require specific tools or skilled personnel, such as mapping do you have the capabilities and the staff to complete your plan? Attach a Word document with the planning team's CV/resumes into the zip folder. Describe the circumstances under which this plan will be updated and detail how subsequent updates will be funded.</p>		
Insert Attachment:		Please title zip folder: EntityNameCP_GPS

<b>Implementation Plan</b>		
<p>Use the Implementation Plan Template provided in Appendix D to prepare a chronological timeline for the entire life of the project that organizes work into logical, manageable tasks and deliverables.</p>		
Insert Attachment:		Please rename template: EntityNameIP_GPS

<b>Budget</b>		
<p>Include your project budget using the Budget Worksheet provided as Appendix E (and in the GPS Application, Appendix A). Ensure your budget is reasonable, appropriate and accurate. Are the budgeted items consistent with the project description and tasks? Does the amount requested fall within the GPS's allowable minimum (\$20,000) and maximum (\$10,000,000)? Ensure there is no duplication of benefits.</p>		
Insert Attachment:		Please rename template:EntityNameBudget_GPS

Is there any duplication of benefits?	Yes:		No:	<input checked="" type="checkbox"/>
All funds identified for use on your project must be fully disclosed and detailed to ensure budget accuracy and no duplication of benefits.				
Will funding – other than CDBG-MIT funding – be used to fund this project? If yes, detail the anticipated or committed funds in the Leveraged Dollars section.	Yes:	<input checked="" type="checkbox"/>	No:	

<b>Leveraged Dollars</b>			
If your project involves the qualified use of matching or leveraged funds or services, describe the specifics of leveraged fund/service usage. Are there local or other funds available to address the proposed project in whole or in part? If yes, report all sources of funding and the amount available. Disclose sources and uses of non CDBG-MIT funds. What other federal, state and/or local entities have you contacted concerning funding for the proposed project and what were the results? Put "N/A" if this section is not applicable to your project.			
The City of Pensacola has allocated \$10,000 to the Pensacola Stormwater Drainage Plan.			
<b>Compliance</b>			
According to 84 FR 45838 August 30, 2019 Section V.A.(18), "The State shall make reviews and audits, including on-site reviews of any subrecipients, designated public agencies and local governments, as may be necessary or appropriate to meet the requirements of section 104(e)(2) of the HCDA, as amended, as modified by this notice. In the case of noncompliance with these requirements, the State shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences, and prevent a recurrence. The State shall establish remedies for noncompliance by any designated subrecipients, public agencies, or local governments."			
Can you certify to comply with state and federal register regulations as outlined in 84 FR 45838?	Yes:	<input checked="" type="checkbox"/>	No:
<b>Sign and Date</b>			
As the primary entity contact for this project, I certify:			
A. All staff, contractors, vendors and community partners of our mitigation initiative:			
1. Will comply with all HUD and Florida requirements in the administration of the proposed CDBG-MIT funded activities;			
2. Will work in a cooperative manner to execute the Subrecipient Agreement that provides the pathway for successful CDBG-MIT program(s) and/or project(s) and;			
B. All information submitted in this Application is true and accurate.			
Signature:		Date: 05/15/2020	
Peyton Wolf			

Print button will only print application and not attached documents. Submit button will deliver application to email to the [cdbg-mit@commerce.fl.gov](mailto:cdbg-mit@commerce.fl.gov). Please attach all relevant documents to this email.

Print Application

Submit Application

## Project Description

The City of Pensacola, in coordination with Escambia County and the Northwest Florida Water Management District (WMD), is seeking funding to create a stormwater drainage system. The plan will provide benefit to the Pensacola metropolitan area, as well as the surrounding suburbs and wetland areas. The need for this plan has been established in the City's Comprehensive Plan and the final product will provide an implementation strategy for stormwater drainage mitigation actions.

Pensacola has historically faced drainage issues during severe storm and tropical cyclone events. The inundation of rain in short periods of time overwhelms the existing system and results in flooding in residential and commercial areas. In addition, the intermittent flooding results in city waste being washed into the wetlands surrounding the city, causing pollution and harm to waters of the United States. The purpose of this plan is to identify the specific causes of the flooding and adapt the current system to mitigate the hazards of flooding caused by severe storms and tropical cyclones.

The plan will include a risk assessment of the current stormwater drainage system based on FEMA Hazard Mitigation guidance, including the identification of the location, extent, and previous occurrences of natural hazards, the probability of future hazard events, summaries of the most vulnerable areas, potential losses due to hazard events, and changes in development in hazard prone areas. A mitigation strategy will be developed based on the risk assessment findings. The resulting plan will provide a blueprint for concrete mitigation action items that the City will integrate into its future plans and for which it will apply for funding.

Plan development will begin with committee meetings with City planners, County officials, WMD representatives, Emerald Coast Regional Planning Council representatives, the U.S. Army Corps of Engineers, and other stakeholders. The planning committee will seek input from the public via an online survey and provide an email address through which the public may communicate concerns. In addition, a total of three public meetings will provide community members the opportunity to express hazard concerns and suggest mitigation strategies. The meetings will be held at the following intervals: prior to the first committee meeting; during the risk assessment phase; and after the risk assessment is complete.

The plan will be written by City planners. The four-person City planning team is currently managed by Peyton Wolf. Peyton has been a City planner for 24 years and holds a Master's of Public Planning from FSU. Quinn James has been a City planner for twelve years and specializes in neighborhood planning and community design. Avery White has been a City planner for seven years and specializes in environmental transportation planning. The final team member is Taylor Adams, who has been the Geographic Information Systems (GIS) specialist for the City for three years.

The requested funding amount is based on six months of planning team and grant management salaries, the cost of the most updated GIS software, and estimated administration costs.

The anticipated outcome is a stormwater drainage plan for the City of Pensacola that identifies current and future hazards, community assets, summarizes stormwater vulnerability, establishes and prioritizes mitigation goals, and presents an implementation strategy. The implementation strategy will include a discussion of possible funding opportunities.

Pensacola currently has a Comprehensive Plan that discusses the need for stormwater drainage updates. See attached Executive Summary and the specific page that mentions stormwater drainage planning.

### Community Value

The Pensacola Stormwater Drainage Plan will provide value to the community in normal circumstances and in times of natural disaster by creating a blueprint for projects that will enhance the resiliency of the City of Pensacola, the surrounding neighborhoods, and the protected wetlands around the city. The goal of this project is to identify the hazards presented by flooding, summarize flooding vulnerability, and present an implementation plan of mitigation goals and activities. Upon completion of this goal, the City of Pensacola will be positioned to undertake mitigation activities that will provide value to the community by reducing the occurrence and frequency of flooding. The overall result will be a resilient City that is prepared for an increase in extreme weather events.

The Pensacola Stormwater Drainage Plan will serve the following community lifelines: safety and security; food, water, and shelter; health and medical; energy; communications; transportation; and hazardous materials. The plan will provide a blueprint to reduce flooding in Pensacola and the surrounding areas, which will result in fewer floods that endanger the safety and security of residents and force homeowners to leave their primary source of shelter. The reduction in flooding will also allow critical services such as medical, communications, energy, and transportation to remain functional during conditions that would currently result in flooding. Finally, the reduction in flooding will ensure that hazardous materials remain safely contained during adverse weather conditions.

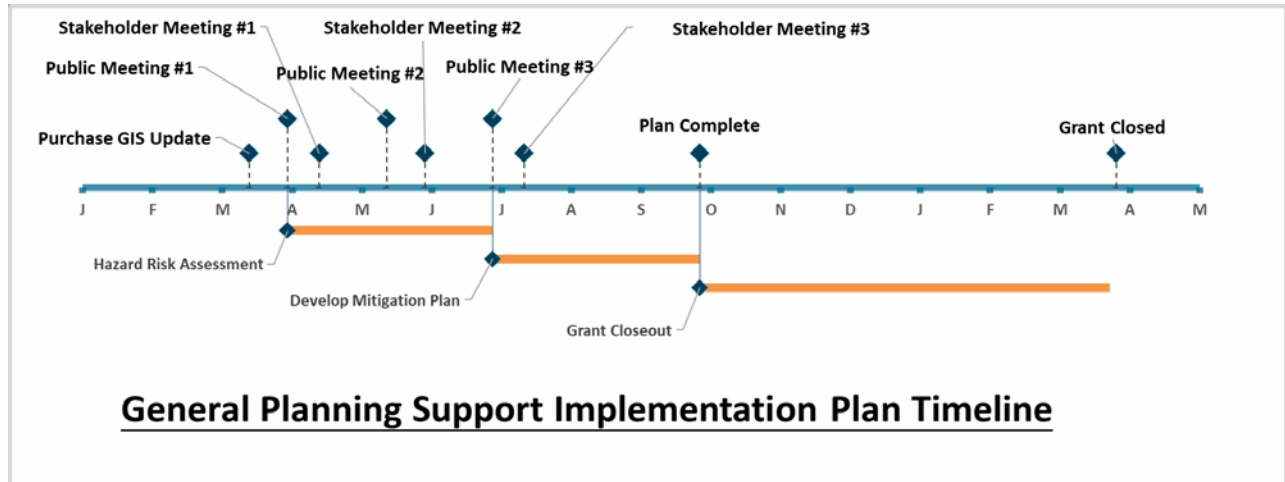
The planning committee will seek input from the public via an online survey and provide an email through which the public may communicate concerns. In addition, total of three public meetings will provide community members the opportunity to express hazard concerns and suggest mitigation strategies. The meetings will be held at the following intervals: prior to the first committee meeting; during the risk assessment phase; and after the risk assessment is complete. The final plan will be posted on the Pensacola City Planning website: [www.Pensacola.gov/Planning](http://www.Pensacola.gov/Planning).

### Capacity Plan

This goal of the Pensacola Stormwater Drainage Plan is to identify the hazards presented by flooding, summarize flooding vulnerability, and present an implementation plan of mitigation goals and activities. The City of Pensacola will coordinate with stakeholders including Escambia County, Northwest Florida Water Management District, Emerald Coast Regional Planning Council, the U.S. Army Corps of Engineers, and community leaders. Major work tasks include a hazard risk assessment, public meetings, purchase of GIS software update, and the final Pensacola Stormwater Drainage Plan. Current resources include a dedicated planning team staff, a GIS specialist, and a \$10,000 allocation by the City for this project. The grant would be monitored by the city grant management team.

The Pensacola Stormwater Drainage plan will be implemented by the City Planning team and grant management will be provided by a City grant manager. The four-person City planning team is currently managed by Peyton Wolf; Peyton has been a City planner for 24 years and holds a Master's of Public Planning from FSU. Quinn James has been a City planner for 12 years and specializes in neighborhood planning and community design. Avery White has been a City planner for seven years and specializes in environmental transportation planning. The final team member is Taylor Adams, who has been the Geographic Information Systems (GIS) specialist for the City for three years. Attached please find resumes for all four members of the Planning team. The City currently has a dedicated team of grant managers who are available to provide management of this planning grant.

The Stormwater Drainage Plan should be updated no later than 20 years after it is finalized, or in the case of a significant change in climate that results in the plan becoming obsolete. The City will seek update funding from a mitigation planning grant, such as a new CDBG-MIT allocation or a FEMA Hazard Mitigation Grant.



**Pensacola Stormwater Drainage Plan**

City of Pensacola

**Peyton Wolf (800)555-5555**

Wednesday, April 1, 2020

**Tasks**

Start	End	Duration	Label
04/01	07/01	91	Hazard Risk Assessment
07/01	10/01	92	Develop Mitigation Plan
10/01	04/01	182	Grant Closeout

**Milestones**

Date	Label
<u>4/1/2020</u>	<u>Public Meeting #1</u>
<u>3/15/2020</u>	<u>Purchase GIS Update</u>
<u>4/15/2020</u>	<u>Stakeholder Meeting #1</u>
<u>5/15/2020</u>	<u>Public Meeting #2</u>
<u>6/1/2020</u>	<u>Stakeholder Meeting #2</u>
<u>7/1/2020</u>	<u>Public Meeting #3</u>
<u>7/15/2020</u>	<u>Stakeholder Meeting #3</u>
<u>10/1/2020</u>	<u>Plan Complete</u>
<u>4/4/2021</u>	<u>Grant Closed</u>

*Insert new rows above this one*



**FL CDBG Mitigation  
General Planning Support Program Project Budget (Template)**

Project Name:				Primary Contact Name and Phone Number:		Official Applicant Entity Name:	
Project			Budget			Notes	
Description	CDBG-MIT Amount	Other non CDBG-MIT Funds	Source of Funds*	Total Funds (CDBG-MIT and Other)			
<b>1. Mitigation Plans</b>							
Regional Mitigation Plans							
Modernization and Resiliency Plans	\$60,000	\$10,000	City of Pensacola	\$70,000	Pensacola Stormwater Drainage Plan		
Comprehensive Plans							
Capital Improvement Plans							
Land Use Plans							
Other Plans							
<b>2. Mitigation Activities</b>							
Mapping/Data Upgrades	\$5,000	-	-	\$5,000	Update GIS software		
NFIP CRS Program							

**Mitigation General Planning Support Program Guidelines**

Education/Outreach Campaigns					
Modern/Resilient Building Codes					
Property Registration/Land Information System					
<b>Administration</b>	\$10,000	-	-	\$10,000	
<b>Planning</b>					
<b>Totals:</b>	<b>\$75,000</b>	<b>\$10,000</b>		<b>\$85,000</b>	

**\* All funds identified for use on your project must be fully disclosed and detailed to ensure budget accuracy and no duplication of benefits. Show the sources and amounts of other funds needed to complete the project below, including local funds and grants from other agencies. Any anticipated or committed funds must also be included.**

<b>Source of Other Funds</b>	<b>Amount</b>
1. City of Pensacola	\$10,000
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	

## Appendix D – Implementation Plan Template

### Instructions for using Implementation Plan Template

Enter project name, official applicant entity name and primary contact name and phone number in the header space at the top of the template.

This template is customizable to fit your project. Feel free to edit the segments and add notes when needed.

1. The box titled “General Planning Support Program Implementation Plan Timeline” will display a visual timeline of the data that you enter into the “Tasks” box.
2. The “Tasks” box should list the major manageable tasks and deliverables of the proposed project and include the entire life of the project. Enter the approximate start and end dates of each task and/ or deliverable under the tabs “Start” and “End”. “Duration” encompasses the number of days the task runs for. Excel should already calculate the duration based on the start and end dates you enter. If this is not the case, enter in the number of days as the duration of each task and/ or deliverable. Label each task and/ or deliverable appropriately under the “Label” section.
  - A. Within the “Tasks” box, there are 15 available slots for project timeline tasks. When adding/changing tasks within the box, select the row (select the values under “Start” to “Label”).
  - B. For this example, the “Sample Text” task needs to be moved under the “Mapping Upgrades” task. Once you select the row, right click, select “Cut”, a dotted line around your selected row should appear. Next, select the “Community Outreach Phase 1” row. Right click and select “Insert Cut Cells”. Now “Sample Text” will appear under “Mapping Upgrades”. The visual timeline above the “Tasks” will also reflect these changes.

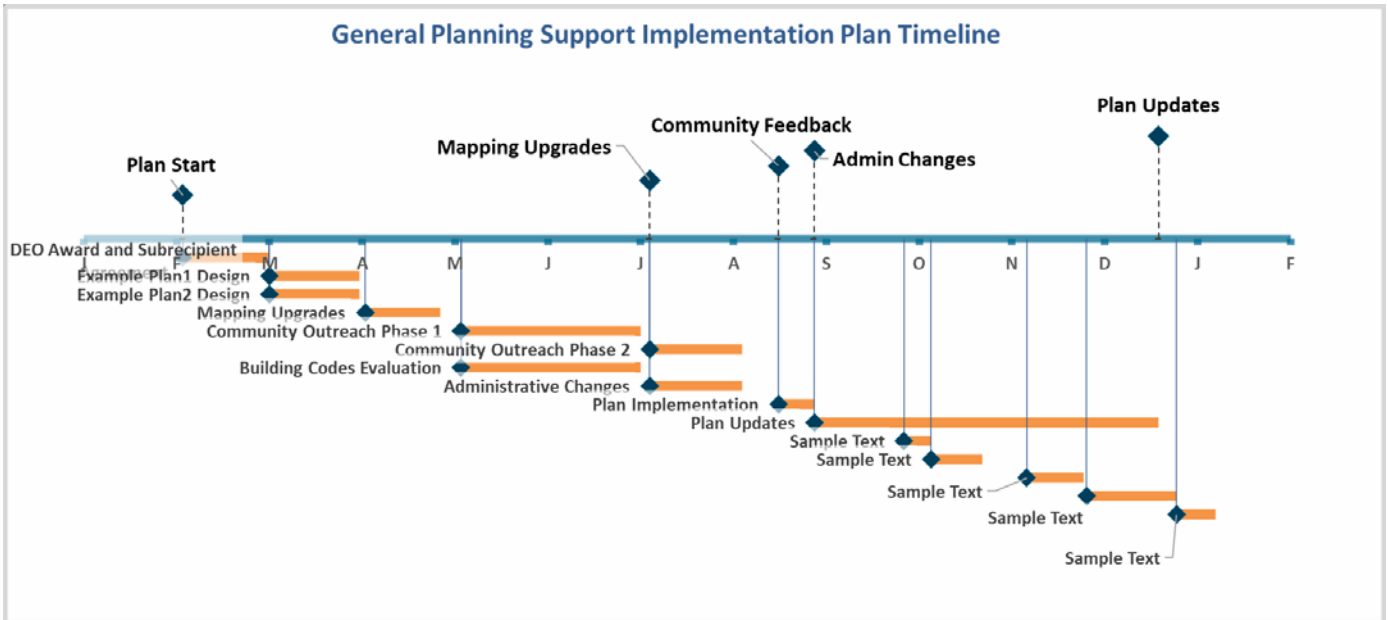
Follow these guidelines for customizing your timeline. You may add lines within the “Tasks” section below existing tasks by highlighting the complete box rows, right click, select “Insert...”, a dialogue box will appear, select “Shift cells down”, select “Ok”. This will shift all boxes below the selected row down the excel sheet.

1. The “Milestones” box may be used to list major project milestones such as the start or completion of the project. Any changes to this box can be made by following the directions described previously. The label for your new milestone may needed to be added in manually. You can do this by clicking on one of the existing milestone texts in the visual timeline. For example, you may click “Admin Changes” above the diamond icon. All other text boxes for milestones should be outlined by boxes.

Next, select the box that does not have a label. Now enter in the label for this milestone.

You may move and change the size of each text box.

- The “Notes” box allows you to list any additional notes about the project timeline that may be necessary for FloridaCommerce to read.



**Project Name**  
**Official Applicant Entity Name**  
**Primary Contact Name and Number**  
**Date**

### Tasks

Start	End	Duration	Label
02/03	03/03	29	FloridaCommerce Award and Subrecipient Agreement
03/03	04/03	30	Example Plan1 Design
03/03	04/03	30	Example Plan2 Design
04/04	05/04	25	Mapping Upgrades
05/06	07/06	60	Community Outreach Phase 1
07/08	08/08	31	Community Outreach Phase 2
05/06	07/06	60	Building Codes Evaluation
07/08	08/08	31	Administrative Changes
08/20	09/01	12	Plan Implementation
09/01	12/25	115	Plan Updates
10/01	10/10	9	Sample Text

10/10	10/27		17	Sample Text
11/11	11/30		19	Sample Text
12/01	12/31		30	Sample Text
12/31	01/13		13	Sample Text

Milestones

Date	Label
2/3/2020	Plan Start
7/8/2020	Mapping Upgrades
8/20/2020	Community Feedback
9/1/2020	Admin Changes
12/25/2020	Plan Updates
<i>Insert new rows above this one</i>	

## Appendix E – Budget Worksheet

### General Planning Support Program Project Budget Template Instructions

This template is customizable to fit the budget proposal for your project. Feel free to edit left-hand segments and add notes when needed.

If a section does not have enough cells for the category that you are working on, you can add cells by highlighting a complete row and right-clicking. A dialogue box will appear that permits you to add a row of cells. Click “Insert” and then select either “Insert Above” or “Insert Below”, depending on where you would like the new row to be placed. The new row will appear above or below the row you highlighted.

Enter project name, primary contact name and phone number and the official applicant entity name.

1. On the left-hand side of the template there is a list of major project items numbered 1 to 3. Beneath each major project are related sub-groups. You may edit each of these areas to fit your proposed budget plan. For example, if you do not have Mitigation Activities, you may delete that numbered row and the related subgroups.
2. List anticipated and committed sources of other project funding sources in the “Sources of Other Funds” category. These funds are non-CDBG-MIT funds. Include entities you have contacted, even if a funding commitment has not yet been made. Disclose the amount you requested or expect to receive. If you need to add rows in this section, follow the directions for adding rows outlined above.
3. You can use the right-side Notes column to elaborate on budgeted items as needed.

**FL CDBG Mitigation**

**General Planning Support Program Project Budget (Template)**

Project Name:		Primary Contact Name and Phone Number:		Official Applicant Entity Name:	
<b>Project</b>	<b>Budget</b>				<b>Notes</b>
Description	CDBG-MIT Amount	Other non-CDBG-MIT Funds	Source of Funds*	Total Funds (CDBG-MIT and Other)	
<b>1. Mitigation Plans</b>					
Regional Mitigation Plans					
Modernization and Resiliency Plans					
Comprehensive Plans					
Capital Improvement Plans					
Land Use Plans					
Other Plans					
<b>2. Mitigation Activities</b>					
Mapping/Data Upgrades					
NFIP CRS Program					

**Mitigation General Planning Support Program Guidelines**

Education/Outreach Campaigns					
Modern/Resilient Building Codes					
Property Registration/Land Information System					
<b>Administration</b>					
<b>Planning</b>					
<b>Totals:</b>					



**\* All funds identified for use on your project must be fully disclosed and detailed to ensure budget accuracy and no duplication of benefits. Show the sources and amounts of other funds needed to complete the project below, including local funds and grants from other agencies. Any anticipated or committed funds must also be included.**

Source of Other Funds	Amount
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12.	