

Hermine & Matthew Implementation Training FAQ

Day 1:

Questions:	Answers:
Will I be able to print these slides off at the end or do I need to screenshot?	The full training slides are available on DEO's website.
Do applicants have access to the ratings and rankings of risk assessments?	After the subrecipient agreement is executed, a risk assessment will be conducted during a site visit. You will be provided with our assessment once scoring is complete. This will determine the amount of technical assistance and the level of monitoring DEO will conduct.
What is the FFATA?	Federal Funding Accountability and Transparency Act of 2006

Day 2:

Questions:	Answers:
<p>We are looking to do a buyout. One of the properties has received several insurance claims which were used for post-storm rehab. They are applying for buyout and the end use of the property will be demolition. Even though they have received insurance claims, would this be a duplication of benefit (DOB)?</p>	<p>The insurance funds would not create a reduction in their award for demolition if the funds were spent for their intended purpose. The county will still have to perform a DOB check to ensure that the insurance funds were spent correctly. If the funds were supposed to be for rehabilitation, but were spent on non-rehabilitation expenses, the amount would be reduced from their award. This must be backed-up with appropriate documentation.</p> <p>Please reference the Program Guidelines for Buyout Implementation for additional guidance.</p>
<p>Does HUD have a flow chart for situations when Uniform Relocation Act (URA) requirements are triggered for an applicant?</p>	<p>Please see the below resources:</p> <ul style="list-style-type: none"> • Tenant Assistance, Relocation and Real Property Acquisition Handbook (1317.0) • URA the HUD Way
<p>How do we secure contractors through a pre-qualified process since bids aren't in for housing rehab yet? Can we secure contractors based on qualifications and then have them bid on specific rehab packages?</p>	<p>The Subrecipient must adhere to its local procurement policy. The Subrecipient must also abide by state (F.S. Chapter 287) and federal (2 CFR 200.320) procurement regulations. Additionally, the subrecipient can develop its own selection process and verify its policy incorporates and/or is equivalent with its local, State and Federal procurement regulations listed above. The Subrecipient should consult with their procurement department with alternative procurement methods.</p>
<p>Is there an approved process for securing a pre-qualified vendor list who then bid on individual or packaged rehab projects?</p>	<p>The Subrecipient must adhere to its local procurement policy. The Subrecipient must also abide by state (F.S. Chapter 287) and federal (2 CFR 200.320) procurement regulations. Additionally, the subrecipient can develop its own selection process and verify its policy incorporates and/or is equivalent with its local, State and Federal procurement regulations listed above. The Subrecipient should consult with their procurement department with alternative procurement methods.</p>
<p>If only architecture and engineering services can be secured through qualifications how can we secure contractors based on qualifications rather than price?</p>	<p>The Subrecipient must adhere to its local procurement policy. The Subrecipient must also abide by state (F.S. Chapter 287) and federal (2 CFR 200.320) procurement regulations. Additionally, the subrecipient can develop its own selection process and verify its policy incorporates and/or is equivalent with its local, State and Federal</p>

	<p>procurement regulations listed above. The Subrecipient should consult with their procurement department with alternative procurement methods.</p>
<p>Most LMI households will not have access to any \$ if they already spent the other disaster assistance for something other than repairs. How do we address their project since we can't "partially" assist them and leave their property in a substandard condition? Are they just not qualified for the program?</p>	<p>If the funds were used for another purpose, it would be a duplication of benefit. The household must fill the gap of duplicative assistance by providing money in escrow to be eligible for assistance. Local policies and procedures and program guidelines should address how the local government will address this situation. If the situation arises, consult with your grant manager.</p>
<p>Please clarify duplicative activities? Repairs are different from replacement; do we consider repair funds as duplicative in a replacement?</p>	<p>The repair funds would not create a reduction in their award if the funds were spent for their intended purpose. The county will still have to perform a DOB check to ensure that the repair funds were spent correctly. If the funds were supposed to be for rehabilitation, but were spent on non-rehabilitation expenses, the amount would be reduced from their award. This must be backed-up with appropriate documentation.</p> <p>Please reference: Clarification of Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees</p> <p>Analysis of Duplication of Benefits</p>
<p>Can SBA loans be waived in DOB for financial limitations with an applicant?</p>	<p>Currently, the applicant will need to demonstrate a hardship. This must be backed-up with appropriate documentation.</p> <p>Please reference: Clarification of Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees</p> <p>Analysis of Duplication of Benefits</p>
<p>Do we send each DOB analysis to DEO for confirmation?</p>	<p>The DOB analysis will be performed and owned by the local government. The DOB analysis will be submitted to DEO. DEO will the perform the Verification of Benefits (VOB) process.</p>
<p>I want to confirm that private loans and lines of credit are considered non-</p>	<p>Yes, they are non-duplicative.</p> <p>Please reference:</p>

<p>duplicative under HUDs list of non-duplicative funds?</p>	<p>Clarification of Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees</p> <p>Analysis of Duplication of Benefits</p>
<p>Can an applicant not have filed an insurance claim because they are low income and can't afford the deductible? If they are financially incapable of paying the deductible can they claim a financial constraint?</p>	<p>No, CDBG-DR is to supplement an unmet need. If there are other funds available, they must be utilized. CDBG-DR is funding of last resort.</p> <p>Please reference: Clarification of Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees</p> <p>Analysis of Duplication of Benefits</p>
<p>If they received funds for rental assistance that they used for something else, then count it towards their DOB for rehab even though the activity rental assistance is different than what we are providing funds for rehab?</p>	<p>Rental assistance is not related to repairing the house, therefore it is not duplicative.</p> <p>Please reference: Clarification of Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees</p> <p>Analysis of Duplication of Benefits</p>
<p>Are appraisals based on pre-disaster value for a residential voluntary acquisition in the floodplain?</p>	<p>Please reference the Program Guidelines for Buyout Implementation for additional guidance. Subrecipients can specifically reference the Acquisition Awards determination section on Page 4 of the document.</p>
<p>Are there any additional requirements for URA when property is being voluntarily acquired in order to construct new LMI housing? The acquisition may result in a business or non-profit being displaced?</p>	<p>Please contact your grant manager if this scenario occurs within your program.</p> <p>Also, please see the below resources:</p> <ul style="list-style-type: none"> • Tenant Assistance, Relocation and Real Property Acquisition Handbook (1317.0) • URA the HUD Way
<p>Household acquisition or reconstruction of 1-4 unit structures that contains an owner in one unit and a tenant in one of the other units like a duplex may result in tenant</p>	<p>The Subrecipient must follow URA requirements and DEO does not need to be specifically notified at each occurrence. This will be monitored by DEO.</p> <p>Please see the below resources:</p>

displacement. Do we need to notify you of this?	<ul style="list-style-type: none">• Tenant Assistance, Relocation and Real Property Acquisition Handbook (1317.0)• URA the HUD Way
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Day 3:

Questions:	Answers:
Can the 8-step process for a flood zone and wetland be combined?	The 8-step process applies to both categories. Each step is separate and must be followed. Please refer to 24 CFR Part 55
Can you give an example of a good alternative for a housing rehab project?	When a home is in a floodway, rehabilitation is restricted. An alternative would be acquisition.