



# Rebuild Florida Workforce Recovery Training Program Guidelines

## Workforce Recovery Training Program Guidelines

This document provides the guidelines for implementation of the Rebuild Florida Workforce Recovery Training Program (WRTP) for Hurricane Michael administered by the Florida Department of Economic Opportunity (DEO). This program is funded by the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant – Disaster Recovery (CDBG-DR) allocation described in the *Supplemental Appropriations for Disaster Relief Act, 2018* (Public Law 115-254) and the *Additional Supplemental Appropriations for Disaster Relief Act, 2019* (Public Law 116-20).

Application Cycle: October 1 – December 15, 2020

**VERSION 1.3**

**September 2021**

## VERSION HISTORY

| Version Number | Change Date | Summary of Changes  |
|----------------|-------------|---|
| 1.1            | 7/02/2021   | Page 7, revised end date for training activities to May 31, 2025  |
| 1.2            | 3/30/2021   | Page 8, revised Anti-Fraud and Compliance Policies to Anti-Fraud, Waste, and Abuse<br>Page 23, revised Office of Disaster Recovery to Office of Long-Term Resiliency (OLTR) |
| 1.3            | 9/1/2021    | Changed formatting of entire document to mirror OLTR Policy Document Guidelines<br>Reorganized sections to mirror other OLTR policy documents                               |
|                |             |   |
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|                |             |   |

## VERSION POLICY

Version history is tracked in the Version History Table 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 Michael Community Development Block Grant - Disaster Recovery Program 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 Department of Economic Opportunity's Policies and Procedures Manual.

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## Part 1 Definitions

**Action Plan:** The *State of Florida Action Plan for Disaster Recovery (Action Plan)* for Hurricane Michael details the programs that the Florida Department of Economic Opportunity (DEO) will implement to address the unmet needs for Floridians to recover from the storm. The *Action Plan* was approved by the U.S. Department of Housing and Urban Development (HUD) on June 26, 2020.

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

**Community Development Block Grant - Disaster Recovery (CDBG-DR):** Federal funding provided by HUD to help communities, especially low-income areas, recover from Presidentially declared disasters.

**Disability:** For the purposes of the program, "disability" is consistent with federal law under the Social Security Act, as amended, 42 U.S.C. §423(d), the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §12102(1)-(3), and in accordance with HUD regulations at 24 CFR 5.403 and 891.505.

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

**Educational Institution:** Any public school, center, institution, or any other entity that is part of Florida's education system under public K-12 schools, public postsecondary educational institutions, and the Florida Virtual School.

**Family:** All persons living in the same household who are related by birth, marriage, or adoption.

**Federal Register (FR):** 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.

**Florida Department of Economic Opportunity (DEO):** Administrator of the CDBG-DR program funded by HUD under Public Laws 115-254 and 116-20. DEO is the governor-designated state authority responsible for administering all long-term disaster recovery funds awarded to Florida from HUD.

**Graduate:** Any individual who successfully completes training for a construction occupation through the WRTP.

**Income:** Annual income as reported under the Census long-form for the most recent available decennial Census. This definition includes:

- Wages, salaries, tips, commissions, etc.;
- Self-employment income from own nonfarm business, including proprietorships and partnerships;
- Farm self-employment income;
- Interest, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;
- Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- Retirement, survivor, or disability pensions; and
- Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

**Local Workforce Development Board (LWDB):** A board established pursuant to section 107 of the Workforce Innovation and Opportunity Act, Pub. L. No. 113-128, Title I, (WIOA) and Section 445.007, Florida Statutes. LWDBs develop and implement policies that support the regional economy and provide oversight over its workforce development system.

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

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

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

**Low- and Moderate- Income (LMI) Person:** A member of a household having an income equal to or less than the Section 8 low-income limit established by HUD. Unrelated individuals will be considered as one-person household for this purpose.

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

**Low-Income Person:** A member of a family that has an income equal to or less than the Section 8 very low-income limit established by HUD. Unrelated individuals shall be considered as one-person families for this purpose.

**Most Impacted and Distressed (MID) 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 Bay, Calhoun, Franklin, Gadsden, Gulf, Jackson, Liberty, Wakulla and Washington Counties. The state-identified MID areas, Holmes, Leon, and Taylor Counties include those counties that received both Individual Assistance (IA) and Public Assistance (PA) through the Federal Emergency Management Agency (FEMA).

**Participant:** Any individual that receives workforce training services or other benefits under the WRTP.

**Request for Applications (RFA):** The DEO notice requesting applications for funding as a subrecipient for the WRTP.

**Response:** Any application received for funding as a subrecipient under the WRTP.

**Subrecipient:** Any LWDB, educational institution, or technical center that has been awarded funding to implement a WRTP project and that has executed a subrecipient agreement.

**Subrecipient Agreement:** An agreement between DEO and a subrecipient that has been awarded funding to implement a WRTP 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 disaster recovery grants, a subrecipient or participant must enter into a subrogation agreement in which the funding agency (DEO) obtains the right to collect any additional disaster recovery or workforce training payments the entity or participant obtains for the same purpose after the entity or participant have entered into the WRTP and is receiving benefits.

**Technical center:** A public school or public technical center operated under a charter granted by a district school board or Florida College System institution board of trustees or a consortium, including one or more district school boards and Florida College System institution boards of trustees, that includes the district in which the facility is located, that is nonsectarian in its programs, admission policies, employment practices, and operations, and is managed by a board of directors.

**United States Department of Housing and Urban Development (HUD):** The federal agency responsible for national policy and programs that address America’s housing needs, that improve and develop the Nation’s communities, and enforce fair housing laws.



## Part 2 Program Overview

### 2.1 Introduction

On October 10, 2018, Hurricane Michael made landfall near Mexico Beach in Bay County as a Category 5 storm. The hurricane moved northeast across several Florida counties before traveling into Georgia and across the southeastern United States. As one of the strongest hurricanes on record, Hurricane Michael caused unprecedented damage to housing, businesses, and infrastructure in Florida's Panhandle. The impacts of Hurricane Michael demonstrated the need for an effective, comprehensive long-term recovery plan that would address and meet the remaining unmet needs of Floridians.

Following a major disaster, Congress can appropriate funds through the Community Development Block Grant-Disaster Recovery (CDBG-DR) program to satisfy a portion of unmet need that remains after other federal assistance such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA) or private insurance have been allocated. Based on its assessment of disaster impact, the U.S. Department of Housing and Urban Development (HUD) announced that the state of Florida would receive an allocation of \$735,553,000 in CDBG-DR funds to assist in long-term recovery from Hurricane Michael. The Florida Department of Economic Opportunity (DEO) is the lead agency and responsible entity for administering the CDBG-DR funds allocated to the state of Florida. The availability of the funding was formally announced by publication in the Federal Register, Volume 85, Number 17 on January 27, 2020 (available at <https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf>). Federal Register requirements clearly state that funds may be used only for disaster relief and long-term recovery in communities affected by the specified disaster. Requirements provide that funds be directed to areas with the greatest need.

Hurricane Michael had a significant impact on the housing supply, creating an increased demand for new construction and home repair activities, with additional impact on commercial construction and repair activities. Hurricane Michael also had a significant impact on the local economy of Panhandle communities. The attraction, retention, and return of businesses and jobs to the area is critical to long-term recovery. By addressing the unmet needs in the construction trades and allowing customized training tailored to the specific economic revitalization needs of the region, Florida can provide a new labor force to support the increased demands for post-disaster construction, as well as support Floridians looking for new employment in the post-disaster economy.

Utilizing data from the unmet needs assessment and research on disaster recovery workforce training programs in other states, DEO developed the Rebuild Florida Workforce Recovery Training Program (WRTP) to address the unmet need for skilled trades and specialized training. This program is a CDBG-DR program funded by HUD under Public Laws 115-254 and 116-20. DEO is the governor-designated state authority responsible for administering all long-term disaster recovery funds awarded to Florida from HUD.

## 2.2 Program Overview

The WRTP is being implemented by DEO as provided in the *State of Florida Action Plan for Disaster Recovery (Action Plan)*. This document includes the guidelines for the WRTP for Hurricane Michael, which may be updated and revised to account for additional programming changes and/or *Action Plan* amendments.

Table 1: Hurricane Michael Workforce Recovery Training Program Overview

| Workforce Recovery Training Program Overview |  |
|--|--|
| ALLOCATION FOR ACTIVITY                      | \$8,000,000  |
| MAXIMUM AWARD                                | \$3,000,000  |
| MINIMUM AWARD                                | \$200,000  |
| ELIGIBILITY                                  | The WRTP is a public service activity eligible under the Housing and Community Development Act, Section 105(a)(8). |
| APPLICABLE APPROPRIATION LAW                 | Public Laws 115-254 and 116-20   |
| APPLICABLE FEDERAL REGISTER NOTICE(S)        | 85 Fed. Reg. 17 (Monday, January 27, 2020)   |
| APPLICABLE PRESIDENTIAL DISASTER DECLARATION | FEMA 4399-DR   |

DEO will use a subrecipient model to deliver the WRTP through Florida’s Local Workforce Development Boards (LWDBs), educational institutions, and technical centers. Funding will be awarded to selected subrecipients through a request for applications (RFA) process in accordance with established application and evaluation criteria. **This program is not a direct grant program. No funds will be paid directly to individuals seeking training and employment services.**

The WRTP will provide workforce training to low- and moderate-income (LMI) individuals in the Hurricane Michael Most Impacted and Distressed (MID) areas, through job training in construction occupations and customized training tailored to the specific economic revitalization needs of a particular region. Career services, including job readiness and job placement assistance, will be provided to support successful graduates in obtaining employment. Support services may also be provided to remove barriers to successful participation in training or obtaining employment. The WRTP is a public service program within DEO’s economic revitalization activities for recovery from Hurricane Michael.

The WRTP will be delivered in a multi-step process to comply with all applicable regulations and requirements. The preliminary process includes an RFA to award funding to eligible entities as subrecipients. The selected subrecipients will be responsible for delivery of workforce training, career services, and support services to individual participants. Services may be provided by the subrecipient directly or in partnership with governmental, private sector, or non-profit partners.

## 2.3 Allocation and Award

A total of \$8,000,000 has been set aside for the WRTP. 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.

There is a maximum award of \$3,000,000. There is a minimum award of \$200,000. No entity may receive an award that does not comply with the maximum and minimum award thresholds.

## 2.4 National Objective

The WRTP will meet requirements for the LMI national objective utilizing the LMI limited clientele category. Services provided under this category serve a specific clientele, rather than providing services to all persons in a geographic area. The program will meet the LMI limited clientele category by serving LMI individuals as determined by household size and income. At least 70% of individuals served must meet LMI requirements based on total household income and total household size for the program to meet the LMI national objective.

Definitions provided in Section 102(a)(2) of the HCDA define the term “low- and moderate-income persons” as households and individuals whose incomes are no more than 80 percent of the median income of the area involved. See Appendix A for a table of 2020 HUD income limits for the Hurricane Michael impacted areas.

## 2.5 Program Activities

The focus of the WRTP is to provide workforce training to support disaster recovery efforts. The WRTP will provide workforce training in construction occupations and customized training tailored to the specific economic revitalization needs of a particular region.

The WRTP will also provide career services, including job readiness and job placement assistance, to support successful graduates of training in obtaining employment.

Support services may also be provided to remove barriers to successful participation in training or obtaining employment. Support services may include, but are not limited to: peer support programs; counseling; English to speakers of other languages (ESOL); transportation assistance; child care assistance; and computer skills/digital literacy.

## 2.6 HUD Income Limits

HUD publishes income limits annually. To determine LMI thresholds, the WRTP will use the published HUD income limits for each year as they are made available by HUD. 2020 income limits for the Hurricane Michael impacted areas are included in Appendix A – HUD Income Limits. The income limits in effect at the time of an individual’s application for assistance will determine LMI status.

## 2.7 Eligible Areas

HUD requirements provide that at least 80% of funds must be spent in HUD-identified MID areas, including Bay, Calhoun, Franklin, Gadsden, Gulf, Jackson, Liberty, Wakulla, and Washington counties. Up to 20% of funds may be spent in state-identified MID areas that received both an individual assistance and public assistance declaration, which includes Holmes, Leon, and Taylor counties.



## 2.10 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-DR funds. DEO and subrecipients may not discriminate in any of the following areas: deciding who will be admitted, or have access, to any CDBG-DR 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. Subrecipient programming provided through the WRTP must be open to all participant applicants who meet the eligibility criteria specified in Part 3 of these guidelines. No subrecipient program may limit eligibility or participation criteria based on race, ethnicity, national origin, sex, disability, or any other demographic category.

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 Economic Opportunity

107 East Madison Street

Caldwell Building, MSC 150

Tallahassee, FL 32399-4129

(850) 921-3205

[Civil.Rights@deo.myflorida.com](mailto:Civil.Rights@deo.myflorida.com)

Atlanta Regional Office of FHEO

U.S. Department of Housing and Urban Development

Five Points Plaza

40 Marietta Street, 16th 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>.

## 2.11 Conflict of Interest

State officials and employees, DEO employees, subrecipients, contractors, and consultants who exercise functions with respect to CDBG-DR 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).

An exception to the conflict of interest provision may 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 DEO.

## 2.12 Anti-Fraud, Waste, and Abuse

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@deo.myflorida.com](mailto:cdbg-dr_antifraudwasteabuse@deo.myflorida.com).

All suspected cases of fraud will be taken seriously, and complaints will be reported to OLTR’s Compliance and Reporting Manager and DEO’s Office of the Inspector General at [OIG@deo.myflorida.com](mailto:OIG@deo.myflorida.com). If DEO’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 DEO’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](#).

## 2.13 Files, Records, and Reports

Subrecipients must maintain accurate files and records on each participant, and DEO will retain all pertinent documentation for the grant between HUD and DEO. Compliance will be maintained in accordance with the reporting requirements as outlined in the DEO policies and procedures. This includes all information and reports as required under the subrecipient agreement, DEO contract with HUD, and required demographic data and other information on participants, participant households and awardees.

All official records on programs and individual activities are maintained for a six-year period beyond the date of grant closeout.

## 2.14 Procurement Requirements

Federal, state, and local procurement rules apply when purchasing services, supplies, materials, or equipment. DEO and all subrecipients must abide by the procurement process mandated by federal, state, and local government laws and codes as they are applicable to the WRTP. The procurement process includes the decision to purchase as well as the process to complete the purchase. 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, state, and local procurement regulations should occur, the more stringent regulation will be followed.

## 2.15 Public Records

Pursuant to Article 1, Section 24, Florida Constitution, and Chapter 119, Florida Statutes, DEO 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 DEO can be requested and provided for inspection. Subrecipients participating in the WRTP are also subject to Florida's public records laws. All public records requests made to DEO will be processed in accordance with DEO Administrative Policy 1.06, Processing Public Records Requests. Public records held by subrecipients may be requested by contacting the relevant subrecipient.

## 2.16 Environmental Review

All CDBG-DR 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. DEO has conducted a preliminary review of the eligible WRTP activities. If a subrecipient's activities consist solely of eligible WRTP activities, then in accordance with 24 CFR 58.34(a), the locations associated with WRTP activities are exempt from the environmental review process, except for the applicable requirements of 24 CFR 58.6. Subrecipients are responsible for verifying this preliminary assessment based on their WRTP activities and completing the appropriate environmental review.

For locations that are exempt from the environmental review process, except for the applicable requirements of 24 CFR 58.6, a Certificate of Exemption form and the associated documentation must be provided to DEO at least 7 days in advance of the commencement of WRTP activities at said location. The basic requirements for clearance of these areas, as specified in 24 CFR 58.6, pertain to flood insurance, if required, coastal barrier resources, and clearance of a runway clear zone. If an environmental condition identified on a proposed WRTP activity site cannot be cleared, the site may not be an eligible location for activities.

All environmental reviews must be completed and approved prior to release of funds for the project.

## 2.17 Program Income

This program will not create program income.



## Part 3 Subrecipient Requirements

DEO will use a subrecipient model to deliver the WRTP through selected LWDBs, educational institutions, and technical centers. Subrecipients will be selected through an RFA process.

**This program is not a direct grant program. No funds will be paid directly to individuals seeking training and career services.** For information on requirements for individuals seeking services and benefits through the WRTP, see Part 3 of this document.

### 3.1 Eligible Subrecipient Applicants

The following types of entities may submit an application for funding to provide services as a subrecipient through the WRTP:

- LWDBs whose service area includes a portion of the HUD-identified MID areas for Hurricane Michael. This includes LWDBs 3, 4, and 5.
- Educational institutions with physical locations within the HUD-identified MID areas for Hurricane Michael; and
- Technical centers with physical locations within the HUD-identified MID areas for Hurricane Michael.

Subrecipient applications may include proposed subrecipient partnerships with government, private, or non-profit entities to deliver WRTP services. However, only the eligible entity from the list above may submit an application. If awarded, DEO will maintain one subrecipient agreement and relationship with the eligible applicant only. If a subrecipient applicant intends to utilize previously-selected partners to deliver services, the response must document how partners were selected.

DEO encourages all prospective subrecipient applicants to read the *Action Plan* for Hurricane Michael recovery located at: <http://www.floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/disaster-recovery-initiative/hurricane-michael>.

### 3.2 MID Geographic Distribution

To support compliance with the MID geographic distribution detailed in Section 1.7 Eligible Areas above, entities applying to be subrecipients will be requested to provide a breakdown of the services and associated funding requested to be utilized in HUD-identified MID areas and state-identified MID areas. This breakdown should include funds based on the location where the funds will be expended, e.g. where the training or activities will occur, and not the location where the participant resides. Proposals for funding may only serve the eligible counties detailed in Section 1.7 Eligible Areas above.

To ensure that the WRTP meets HUD requirements for funding distribution detailed in Section 1.7 Eligible Areas above, preference will be given to services to be provided in HUD-identified MID areas. DEO reserves the right to reduce or determine not to fund any portion of an entity's requested funding in order to ensure program compliance with the MID geographic distribution requirement.

### 3.3 Subrecipient Application Period

The application submission cycle for WRTP subrecipient funding will officially open on October 1, 2020, and close on December 15, 2020. If applicable, any extension of the application submission period will be announced and posted on the Hurricane Michael Rebuild Florida WRTP webpage found at: <http://floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/disaster-recovery-initiative/hurricane-michael/rebuild-florida-workforce-recovery-training-program/>.

## 3.4 Subrecipient Application Process

Eligible LWDBs, educational institutions, and technical centers will be invited to submit applications proposing programming for funding through the WRTP. Applications may be submitted at any time during the application period. DEO will take questions about the WRTP throughout the application process. Please email questions or requests for technical assistance to: [workforcerecovery@deo.myflorida.com](mailto:workforcerecovery@deo.myflorida.com).

DEO will host a live webinar on Thursday October 15, 2020, at 2:00 pm EST to provide an overview of the application process and answer questions.

Following the closure of the application period, responses will be evaluated to ensure programming meets the minimum threshold criteria for the WRTP. Responses that meet minimum threshold requirements will then be evaluated according to the evaluation criteria in Section 2.7 Award Determination below to rank responses and determine awarded entities and the level of funding.

## 3.5 Subrecipient Application Requirements

Applications for funding as a subrecipient through the WRTP are required to include proposed job training in construction occupations and customized training tailored to the specific economic revitalization needs of a particular region. For all occupations/trades that are not construction occupations, applicants must provide statistics demonstrating the specific economic revitalization need for each occupation/trade, specific to the local region. A defined time period for each training program must be included, to delineate the amount of time between a participant's entrance into training to the anticipated completion and graduation from training.

Responses are required to include proposed career services, including job readiness and job placement assistance. Career services must be provided to all participants who successfully complete training.

Responses may also include proposed support services to remove barriers to successful participation in training or obtaining employment. Support services may include, but are not limited to:

- Peer support programs;
- Counseling;
- English to speakers of other languages (ESOL);
- Transportation assistance;
- Childcare assistance; and
- Computer skills/digital literacy.

HUD regulations require that public service programs, including the WRTP, must be either a new service or a quantifiable increase in the level of an existing service above that provided through state or local funds in the year before the *Action Plan* was submitted (submitted May 14, 2020). Responses must demonstrate that services seeking funding through the WRTP will meet this requirement.

Responses must include submission of a proposed plan to ensure that the LMI national objective is met. The proposed plan to meet the national objective must demonstrate prioritization or other means to ensure that at least 70% of individuals served meet LMI requirements based on total household income and total household size. Responses should also include statistics demonstrating successful delivery of workforce training services to low income individuals in the 5 years immediately preceding the application.

In accordance with HUD requirements, subrecipient programs and services utilizing CDBG-DR funds may not charge fees to participants, in order to ensure that LMI persons are not precluded from accessing programs and benefits. Responses should confirm that the respondent will not charge fees to participants in programs and/or services provided through the WRTP.

To comply with DEO Language Access Plan requirements for Hurricane Michael impacted areas, responses must include provisions for providing proposed services in English and Spanish.

Responses must include statistics demonstrating the track record of success in providing similar workforce training services, including training graduate placement rate reported by the applicant within the 5 years immediately preceding the application. The applicant should include their graduate placement rate in a percentage form.

Responses may include proposed subrecipient partnerships with government, private, or non-profit entities to deliver WRTP services. If a subrecipient applicant intends to utilize previously-selected partners to deliver services, the response must document how partners were selected. Details should be provided on the activities and services each partner is anticipated to provide, as well as the partner's qualifications and experience in implementing the proposed activities and services. If a subrecipient applicant intends to utilize any partnership(s) to deliver services, responses must include a detailed description of how partners were/will be selected and how the applicant will measure the partner's performance.

Responses must include a description of the proposed marketing and recruitment strategies to engage individuals, particularly within the target LMI demographic, interested in participating in the program.

Responses must include a description of the proposed intake process for individuals interested in receiving services, including application intake, processing, and eligibility determination.

Responses must include descriptions of the proposed process for preventing duplication of benefits or supplanting of other funds, the proposed internal financial and programmatic monitoring process, and the proposed process for maintaining participant files.

Responses must include submission of a proposed budget. The proposed budget must include a detailed description of proposed costs by category, following the template provided in the application. DEO awards of funding do not constitute approval and/or eligibility of all costs in the proposed budget response.

Responses must include proposed targets for participants to be served through the CDBG-DR funding.

Responses must include staffing and capacity information demonstrating that the subrecipient applicant leadership and staff demonstrate the skill, experience, and capacity/resources necessary for implementing the proposed services and performing necessary grant functions, including financial management and compliance.

## 3.6 Subrecipient Applicant Responsiveness

During the application process, a subrecipient applicant is required to respond in a timely manner to DEO 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 request assistance 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.

## 3.7 Award Determination

Responses will be evaluated regarding programmatic services and cost effectiveness. DEO will apply a two-phase process to review applications.

1. Proposals will first be evaluated for Threshold Compliance Criteria. All proposals that pass this phase will proceed to phase two. If a proposal does not meet the Threshold Compliance Criteria, DEO cannot proceed to score it for funding consideration.
2. Proposals will be reviewed and scored based on Program Scoring Criteria. Each evaluator will evaluate and score responses. The maximum score is 190 points.

| Threshold Compliance Criteria |   |
|-------------------------------|---|
|                               | Applicant is an eligible LWDB, educational institution, or technical center   |
|                               | Proposal includes workforce training activities   |
|                               | Proposal includes career services activities  |
|                               | Proposal includes plan to meet low- and moderate-income national objective  |
|                               | Proposal meets public service requirement as either a new service or a quantifiable increase in the level of an existing service above that provided through state or local funds in the year before the <i>Action Plan</i> was submitted |
|                               | Proposal confirms that the respondent will not charge fees to participants in programs and/or services provided through the WRTP  |

| Program Scoring Criteria |   |
|--------------------------|---|
| 10 pts                   | <p><b>Training Timeframe:</b> Applicants will be awarded 10 points upon demonstration that the defined timeframe(s) for participant completion of training is(are) appropriate for the WRTP timeframe and supports Hurricane Michael recovery efforts.</p>  |
| 10 pts                   | <p><b>Services for Individuals with Limited English Proficiency:</b> Applicants will be awarded 5 points for each language in which services are available:</p> <ul style="list-style-type: none"> <li>• English</li> <li>• Spanish</li> </ul>  |
| 10 pts                   | <p><b>Public Service:</b> Demonstration that the proposal meets all HUD public service requirements. Points will be awarded as follows:</p> <ul style="list-style-type: none"> <li>• 5 points – Application demonstrates that proposal provides a new service or a quantifiable increase in the level of an existing service above that provided through state or local funds in the year before the <i>Action Plan</i> was submitted.</li> <li>• 5 points – Application demonstrates that WRTP participants, and any funds expended on WRTP participants, will be above and beyond any available number of training spaces and funding available for the same purpose, including existing funding and training spaces available through the Workforce Innovation and Opportunity Act, the Wagner-Peyser Act, or other federal, state, or local funding.</li> </ul> |
| 20 pts                   | <p><b>Staffing and Capacity:</b> Staff demonstrate skill and experience necessary for implementing the proposed services and performing all grant functions. Points will be awarded as follows:</p> <p><b>Staffing (maximum 10 points):</b></p> <ul style="list-style-type: none"> <li>• 10 points – Over 50% of the identified staff have 5 years or more in leadership, management, and implementation of workforce training programs and/or grant management.</li> <li>• 5 points – Between 25 - 50% of the identified staff have 5 years or more in leadership, management, and implementation of workforce training programs and/or grant management.</li> </ul>   |

**Hurricane Michael Workforce Recovery Training Program Guidelines**

|        |  |
|--------|--|
|        | <ul style="list-style-type: none"> <li>0 points – Less than 25% of the identified staff have 5 years or more in leadership, management, and implementation of workforce training programs and/or grant management.</li> </ul> <p><b>Capacity (maximum 10 points):</b> Applicants will be awarded 10 points upon demonstration that the Respondent has the resources and capacity necessary for implementing the proposed services and performing necessary grant functions, including financial management and compliance.</p>   |
| 20 pts | <p><b>Graduate Placement:</b> Demonstrated track record of success in providing similar workforce training services, including training graduate placement rate. The graduate placement score will be determined based upon the graduate placement rate reported by the applicant within the 5 years immediately preceding the application. The applicant should provide their graduate placement rate in a percentage form, to be applied against the total point value. For example, if the graduate placement rate is 70%, DEO will multiply 70% by 20 (the maximum amount of points) to receive the final graduate placement score of 14 points.</p>   |
| 20 pts | <p><b>Project Impact:</b> The impact of the project to support recovery in the community and efficient use of the proposed use of funds. Applicants may be awarded up to 20 points based on the cost-effectiveness of the proposal, as determined by the ratio of requested funding to proposed participants served through the requested funding. Points will be awarded as follows:</p> <ul style="list-style-type: none"> <li>20 points – Funding per participant is up to \$5,000</li> <li>15 points – Funding per participant is between \$5,001- \$7,500</li> <li>10 points – Funding per participant is between \$7,501- \$10,000</li> <li>5 points – Funding per participant is between \$10,001- \$12,500</li> <li>0 points – Funding per participant exceeds \$12,501</li> </ul>                               |
| 20 pts | <p><b>National Objective:</b> Ability to serve target population to meet LMI national objective. Applicants may satisfy this criteria through submission of plan to meet the LMI national objective and statistics demonstrating successful delivery of support services in the 5 years immediately preceding the application. Points will be awarded as follows:</p> <p>15 points – Submission of a plan demonstrating prioritization or other means to ensure that at least 70% of individuals served through the subrecipient’s WRTP programming will meet LMI requirements based on total household income and total household size.</p> <p>5 points – Statistics demonstrate successful delivery of workforce training services to low income individuals in the 5 years immediately preceding the application.</p> |
| 20 pts | <p><b>Support Services:</b> Quality and robust support services to provide support to trainees. Applicants may satisfy this criteria through submission of the support services to be offered to participants and statistics demonstrating successful delivery of support services in the 5 years immediately preceding the application. Points will be awarded as follows:</p> <ul style="list-style-type: none"> <li>10 points – List of support services to be offered to participants.</li> <li>10 points – Statistics demonstrate successful delivery of support services in the 5 years immediately preceding the application.</li> </ul>  |

|         |  |
|---------|--|
| 20 pts  | <p><b>Career Services:</b> Quality and robust job readiness and job placement assistance to support graduates in obtaining employment. Applicants may satisfy this criteria through submission of the job readiness, job placement, or other career services to be offered to participants and statistics demonstrating successful implementation of career services in the 5 years immediately preceding the application. Points will be awarded as follows:</p> <ul style="list-style-type: none"> <li>• 10 points – List of careers services to be offered to participants.</li> <li>• 10 points – Statistics demonstrate successful implementation of career services in the 5 years immediately preceding the application.</li> </ul> |
| 40 pts  | <p><b>Workforce Training:</b> Applicants will be awarded 40 points upon demonstration that proposed training supports construction occupations or customized training tailored to the specific economic revitalization needs of a particular region. Applicants may satisfy this criteria through submission of a list of proposed occupations/trades for training activities. For all occupations/trades that are not construction occupations, applicants must provide statistics demonstrating the specific economic revitalization need for each occupation/trade, specific to the local region.</p>   |
| 190 pts | Total maximum score  |

DEO will score each response separately based on the information submitted by the subrecipient applicant. Responses that earn a score of at least 100 points are determined to be eligible for funding. If eligible responses exceed available funding, responses will be funded in ranked order based on evaluation score. To ensure that the WRTP meets HUD requirements for funding distribution, preference will be given to services to be provided in HUD-identified MID areas. DEO reserves the right to reduce or determine not to fund any portion of an entity’s requested funding in order to ensure program compliance with the MID geographic distribution requirement. DEO reserves the option to fund all, a portion of, or none of each response submitted by an applicant.

There is a maximum award of \$3,000,000. There is a minimum award of \$200,000. No entity may receive an award that does not comply with the maximum and minimum award thresholds.

### 3.8 Ineligible Entities

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 WRTP funds and may not be selected as a subrecipient, partner, subcontractor, or vendor.

### 3.9 Eligible Costs

All costs must be CDBG-DR eligible. All costs must comply with the requirements of 24 CFR 570 and 2 CFR 200. As outlined in 2 CFR 200 Subpart E, all costs must meet four criteria: necessary, reasonable, allowable, and allocable. See <https://www.hudexchange.info/resources/documents/CDBG-DR-Cost-Types-Summary.pdf> for HUD guidance on costs reasonableness standards.

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

- Workforce training;
- Career services, including job readiness and job placement services;
- Support services;
- Materials and supplies related to WRTP training activities;
- Equipment, if directly relating to delivery of WRTP training activities;

- Participant outreach; and
- Program management and administration.

Ineligible costs for the WRTP include, but are not limited to:

- Income payments, including trainee wages, housing costs, or stipends;
  - Income payments are payments to an individual or family, which are used to provide basic services such as food, shelter (including payment for rent, mortgage and/or utilities) or clothing (with the exclusion of wearable materials and supplies related to WRTP training activities, such as steel-toed boots, hard hats, etc.);
- Travel, material, or supply costs unrelated to WRTP training activities;
- Capital improvements or structural modifications;
- 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;
- Expenditure of funds outside the counties detailed in Section 1.7 Eligible Areas above;
- Payments to a for-profit business while that business or business owner is the subject of unresolved findings for non-compliance with CDBG assistance; or
- Any costs determined as unallowable or ineligible pursuant to applicable state or federal laws or regulations, or guidance from HUD, DEO, or any applicable state or federal agency.

## 3.10 Funding Method

Funding will be provided on a cost reimbursement basis. Subrecipients must verify all documentation and costs before submission for cost reimbursement to DEO. Subrecipients must provide required reporting and supporting documentation to be reimbursed.

## 3.11 Supplanting Funds

Subrecipients must utilize WRTP funds to supplement rather than supplant funds otherwise available. Subrecipients must document that WRTP funds awarded are above and beyond any annual appropriations that are provided for the same purpose, including funding from the Department of Labor, Department of Education, or other federal, state, or local funding. Subrecipients must also document that WRTP funds expended on any participant are above and beyond any other funding available through other sources for the same purpose, including any funding available through the Workforce Innovation and Opportunity Act, the Wagner-Peyser Act, or other federal, state, or local funding. **WRTP funds may only 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.

## 3.12 Subrecipient Responsibilities

Subrecipients responsibilities include, but are not limited to:

- Enter into a subrecipient agreement with DEO specific to the WRTP.
- Comply with all terms and conditions of the subrecipient agreement, these WRTP Hurricane Michael guidelines, policies and procedures published by DEO, the *Action Plan*, and applicable federal, state, and local laws.
- Comply with applicable CDBG-DR cross-cutting regulations. For more information please see: <https://files.hudexchange.info/resources/documents/CDBG-DR-Cross-Cutting-Training-Resources.pdf>.

- Comply with the requirement that only completion and submission of the Rebuild Florida WRTP participant application will be considered as an individual's application for program services and benefits. Subrecipients may not substitute any other application for the Rebuild Florida WRTP participant application. Subrecipients may request additional information from WRTP applicants, but additional information must not be required. Applicant refusal to provide additional information or any additional information obtained by a subrecipient cannot be used as grounds to deny program access and/or determine participant eligibility. **Only the information in the Rebuild Florida WRTP participant application, including supporting documentation, may be considered for determination of an applicant's eligibility for program services and benefits.**
- Process all participant applications received for income determination, duplication of benefits, and eligibility.
- Comply with DEO Language Access Plan requirements for Hurricane Michael impacted areas by providing access to services in English and Spanish.
- Develop policies and procedures as required by DEO to ensure program compliance.
- 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 books, records, and documents relating to the WRTP in accordance with applicable documentation standards and records retention requirements. Records must be made available to DEO or its representatives upon request.
- For educational institution and technical center subrecipients, execute a Memorandum of Understanding (MOU) with the regional LWDB to comply with the requirements of 20 CFR 678.400.
- Ensure that any partners, subcontractors, vendors, or other entities to whom the subrecipient intends to disburse WRTP 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 DEO 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 required reports in the means, format, and frequency requested by DEO.

### 3.13 Income Verification

All subrecipients are required to verify income for any individual applying for services through the WRTP. The calculation method should be clearly identified and documented using the following information and following the specific definitions of each category as outlined below:

Annual income as reported under the Census long-form for the most recent available decennial Census. This definition includes:

- Wages, salaries, tips, commissions, etc.;
- Self-employment income from own nonfarm business, including proprietorships and partnerships;
- Farm self-employment income;
- Interest, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;
- Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- Retirement, survivor, or disability pensions; and



- Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

Income eligibility is determined based on total household income and total household size. Subrecipients are responsible for obtaining documentation verifying income for all applicable household members. CDBG regulations permit self-certification of income for public service activities as referenced in 24 CFR 570.506(b). DEO will make available income self-certification forms to be utilized in accordance with processes and controls outlined in the subrecipient's policies and procedures.

At least 70 percent of individuals served must meet LMI requirements for the program to meet the LMI objective. A subrecipient must document that the beneficiary is low-and moderate-income before CDBG-DR assistance is provided. Re-qualification of income is not required after assistance begins.

### 3.14 Duplication of Benefits Verification

All subrecipients are required to conduct a duplication of benefits screening for any individual applying for services through the WRTP. The duplication of benefits process includes verification of assistance received relating to disaster recovery, workforce training, or other assistance provided for the same or similar purpose as the WRTP. Subrecipients are responsible for maintaining duplication of benefits records for individual applicants and for executing any MOUs or data sharing agreements necessary with federal, state, or local entities to verify benefits received (see Part 4: Duplication of Benefits).

### 3.15 Compliance and Monitoring of Subrecipients

As a recipient of federal funds, DEO is charged with ensuring that any subrecipient has the capacity and means to deliver services and that the costs of its activities are eligible, reasonable, and necessary. Therefore, each subrecipient assessed under the WRTP must demonstrate the organizational capacity and implementation experience necessary to deliver services. Each subrecipient must meet performance metrics for implementation. All subrecipients will be subject to routine monitoring and compliance review by DEO or its representatives. Additional reviews may be conducted by HUD. Monitoring reviews may be announced or unannounced. Monitoring may take place on site or remotely.

## Part 4 Individual Participant Requirements

### 4.1 Participant Application

Individuals seeking to receive training, career services, or other benefits through the WRTP must complete an application. Only completion and submission of the Rebuild Florida WRTP participant application, including the submission of all supporting documentation, will be considered as an individual's application for program services and benefits. An individual may complete an application by:

- Going online to [www.RebuildFlorida.gov](http://www.RebuildFlorida.gov);
- Visiting a subrecipient's office location; or
- Contacting a subrecipient by phone or email.

After WRTP subrecipients are selected, contact information for all subrecipients will be posted on [www.RebuildFlorida.gov](http://www.RebuildFlorida.gov).

During the WRTP application process, subrecipients may request additional information from WRTP applicants, but additional information cannot be required. Applicant refusal to provide additional information or any additional information obtained by a subrecipient cannot be used as grounds to deny program access and/or determine participant eligibility. Only the information in the Rebuild Florida WRTP participant application, including supporting documentation, will be considered for determination of eligibility for program services and benefits.

### 4.2 Participant Priority

Individuals are not guaranteed assistance, but will be served based on availability of funds, qualification for benefits, and priority, as applicable. Participant applications may be accepted and eligibility for services and benefits determined on a priority schedule to ensure compliance with the LMI national objective. Veterans and eligible spouses and dependents will receive priority in accordance with federal regulations. Each subrecipient may set its own priority schedule to meet these requirements. For more information on how priority is determined, interested individuals should contact the appropriate subrecipient.

### 4.3 Participant Application Period

DEO will open the application period for individuals to apply to receive WRTP benefits and services. Following the DEO opening of the application period, the timeframe during which each subrecipient is processing applications and providing services may vary. For more information, interested individuals should contact the appropriate subrecipient.

### 4.4 Income

Participant applicant income must be verified before eligibility is determined for the WRTP. Applicants must provide documentation of income for themselves and members of their household to apply for program benefits. Income eligibility is determined based on total household income and total household size. Income is calculated and verified using the following criteria:

Annual income as reported under the Census long-form for the most recent available decennial Census. This definition includes:

- Wages, salaries, tips, commissions, etc.;
- Self-employment income from own nonfarm business, including proprietorships and partnerships;
- Farm self-employment income;

- Interest, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;
- Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- Retirement, survivor, or disability pensions; and
- Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

HUD publishes income limits annually. To determine LMI thresholds, the WRTP will use the published HUD income limits for each year as they are made available by HUD. The income limits in effect at the time of an individual's application for assistance will determine LMI status.

For individuals who are unable to provide appropriate documentation of income, regulations permit self-certification of income for public service activities as referenced in 24 CFR 570.506(b). For more information on forms required to self-certify income levels, please contact the appropriate subrecipient.

## 4.5 Work Authorization

All participants must be authorized to work in the United States.

## 4.6 Identity

All participants must provide documentation establishing proof of identity.

## 4.7 Age

All participants must be at least 18 years of age or older.

## 4.8 Eligibility Determination Process

Applications are reviewed by the applicable subrecipient. Only the information in the Rebuild Florida WRTP participant application, including supporting documentation, will be considered for determination of eligibility for program services and benefits. The subrecipient makes the determination on eligibility based on these program guidelines and subrecipient policies and procedures.

## 4.9 Ineligible Participants

Any individual who applied for services through the WRTP and cannot provide the required documentation regarding income, work authorization, identity, or age, or otherwise fails to meet criteria in these guidelines, is ineligible for WRTP benefits (*see also* Part 4: Duplication of Benefits).

## 4.10 Complaints or Grievances

Complaints or grievances may be filed regarding any and all concerns that participants or participant applicants may have with the procedures followed and services provided by the WRTP. Complaints or grievances, except complaints alleging unlawful discrimination (*see* Section 1.10 Equal Opportunity above), must be filed first with the appropriate subrecipient. Each subrecipient must have policies and procedures relating to the process for addressing complaints and grievances. Individuals should contact the appropriate subrecipient for more information on the complaint and grievance procedure.

Complaints or grievances relating to actions or decisions made by DEO may be filed with DEO. Any complaint or grievance filed with an inappropriate entity will be forwarded to the proper entity for action.

Complaints or grievances may be submitted to DEO via:

- Online complaint form available on the Rebuild Florida website at: <http://www.rebuildflorida.gov>.
- U.S. Mail to:

Attention: Rebuild Florida Constituent Services  
Florida Department of Economic Opportunity  
107 East Madison Street  
Caldwell Building, MSC 400  
Tallahassee, FL 32399

- Email to: [cms@deo.myflorida.com](mailto:cms@deo.myflorida.com).

## 4.11 Appeals

Appeals may be filed only upon the deliverance of an adverse program decision regarding eligibility, benefits, or closure of an application, and only within the parameters set by the appeals procedure. Participants may not appeal program policy. If an individual is denied program services or benefits and desires to appeal, the individual should first file the appeal with the subrecipient that made the initial eligibility decision. Each subrecipient must have policies and procedures relating to the process for appeals. Individuals should contact the appropriate subrecipient for more information on the appeal procedure.

All appeals must be filed with the subrecipient first. Any appeals filed with DEO before a final determination on the appeal has been made by the subrecipient will be forwarded to the appropriate subrecipient for handling.

If, after following the subrecipient's appeal procedure, an individual wishes to appeal the final determination by the subrecipient to DEO, an appeal may be filed with DEO 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:

Office of Long-Term Resiliency, Special Deputy of Appeals  
Florida Department of Economic Opportunity  
107 East Madison Street  
Caldwell Building, MSC 400  
Tallahassee, FL 32399

- Email to: [cdbg-drappeals@deo.myflorida.com](mailto:cdbg-drappeals@deo.myflorida.com).
- All appeal letters must include:
  - Reason for appeal;
  - A clear explanation why the denial was contrary to applicable laws or regulations or in some other way inequitable;
  - Reason why individual is believed to be eligible for the service or benefit that was denied, delayed, reduced, modified, or terminated;
  - Proposed remedy sought by the individual;
  - Name, contact address, and contact telephone number of individual filing appeal; and
  - Signature and date.

An appeal initiated by a participant or participant applicant with DEO will follow written appeal procedures, which may include, but may not be limited to, informal hearings, third-party review or administrative review. Individuals may contact DEO for more information on the appeal procedure.

## 4.12 Certification Requirements to Receive Assistance

All participants must agree to the following to receive assistance:

- Sign a release so that information provided by the participant applicant may be reviewed, disclosed, released, and shared as necessary to verify information and process the application. The participant applicant and each household member 18 years of age or older is required to sign the release.
- Sign a fraud acknowledgement certifying that information provided by the participant applicant is true and correct, under penalty of law.
- Sign a subrogation agreement acknowledging that any overpayment or duplication of benefits will be subject to recapture.

## Part 5 Duplication of Benefits

### 5.1 Duplication of Benefits

Eligible participants may have previously received assistance from other sources for the same purpose as the WRTP. Under the requirements of The Robert T. Stafford Disaster Assistance and Emergency Relief Act, as interpreted and applied by HUD, DEO, and its subrecipients, DEO and subrecipients must take into account certain aid received by a person or entity in determining the amount of assistance which can be granted. DEO and subrecipients must follow HUD's Duplication of Benefits (DOB) Guidance. Individual applicants and participants must provide any information on benefits received that may create a DOB during the application process and upon request. The subrecipient must perform due diligence verification of DOB information.

The Supplemental Appropriations Act authorizing CDBG funding and the Stafford Act include restrictions on using CDBG-DR program funds to provide assistance when other 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 or not they are in compliance with requirements associated with receipt of those funds. Where applicable, recipients must be in compliance with these restrictions or funding will be denied. Individual applicants and participants must report all financial assistance, other local, state, or federal programs, private or non-profit charitable organizations and other assistance received for the purpose for which the participant is applying for, and receiving, funding or services. For the WRTP, the duplication of benefits process includes verification of assistance received relating to disaster recovery, workforce training, or other assistance provided for the same or similar purpose as WRTP benefits and services.

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

### 5.2 Subrogation

Subrogation is a legal doctrine that allows one person to take on the rights of another. In the context of disaster recovery grants, a WRTP participant must enter into a subrogation agreement where the funding agency (DEO) obtains the right to collect any additional payments the participant receives for the same purpose after the participant has entered into a grant agreement for WRTP benefits.

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

By accepting the award, participants 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 participant's award and provide instructions whether the participant's award will be reduced by such amount, or whether the participant must remit such amounts to the program as reimbursement (when additional assistance received after program disbursements). Each participant will execute and be bound by a subrogation agreement.

Participants 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 duplication of benefits. The subrogation agreement requires the applicant to notify DEO if additional funds are received and to assist DEO in collecting any amounts owed to them from these sources. All parties shall comply with standard anti-fraud measures. DEO 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 DEO and/or the Florida Attorney General's Office.

# Appendix A: HUD Income Limits

| Household Income Limit Categories by County |                            |  |                      |        |        |        |         |         |         |         |
|---|----------------------------|--|----------------------|--------|--------|--------|---------|---------|---------|---------|
| FY 2020<br>Income Limit<br>Area             | Median<br>Family<br>Income | FY 2020<br>Income Limit<br>Category        | Persons in Household |        |        |        |         |         |         |         |
|   |                            |  | 1                    | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Bay County                                  | \$72,000                   | Very Low<br>(50%)<br>Income<br>Limits (\$) | 24,300               | 27,800 | 31,250 | 34,700 | 37,500  | 40,300  | 43,050  | 45,850  |
|   |                            | Extremely<br>Low Income<br>Limits (\$)*    | 14,600               | 17,240 | 21,720 | 26,200 | 30,680  | 35,160  | 39,640  | 44,120  |
|   |                            | Low (80%)<br>Income<br>Limits (\$)         | 38,850               | 44,400 | 49,950 | 55,500 | 59,950  | 64,400  | 68,850  | 73,300  |
|   |                            |  | Persons in Household |        |        |        |         |         |         |         |
|   |                            |  | 1                    | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Calhoun<br>County                           | \$47,900                   | Very Low<br>(50%)<br>Income<br>Limits (\$) | 18,500               | 21,150 | 23,800 | 26,400 | 28,550  | 30,650  | 32,750  | 34,850  |
|   |                            | Extremely<br>Low Income<br>Limits (\$)*    | 12,760               | 17,240 | 21,720 | 26,200 | 28,550* | 30,650* | 32,750* | 34,850* |
|   |                            | Low (80%)<br>Income<br>Limits (\$)         | 29,600               | 33,800 | 38,050 | 42,250 | 45,650  | 49,050  | 52,400  | 55,800  |
|   |                            |  | Persons in Household |        |        |        |         |         |         |         |
|   |                            |  | 1                    | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Franklin<br>County                          | \$55,400                   | Very Low<br>(50%)<br>Income<br>Limits (\$) | 19,400               | 22,200 | 24,950 | 27,700 | 29,950  | 32,150  | 34,350  | 36,600  |
|   |                            | Extremely<br>Low Income<br>Limits (\$)*    | 12,760               | 17,240 | 21,720 | 26,200 | 29,950* | 32,150* | 34,350* | 36,600* |
|   |                            | Low (80%)<br>Income<br>Limits (\$)         | 31,050               | 35,450 | 39,900 | 44,300 | 47,850  | 51,400  | 54,950  | 58,500  |



**Hurricane Michael Workforce Recovery Training Program Guidelines**

|                |          | Persons in Household              |        |        |        |        |         |         |         |         |
|----------------|----------|-----------------------------------|--------|--------|--------|--------|---------|---------|---------|---------|
|                |          | 1                                 | 2      | 3      | 4      | 5      | 6       | 7       | 8       |         |
| Gadsden County | \$72,700 | Very Low (50%) Income Limits (\$) | 25,450 | 29,100 | 32,750 | 36,350 | 39,300  | 42,200  | 45,100  | 48,000  |
|                |          | Extremely Low Income Limits (\$)* | 15,300 | 17,450 | 21,720 | 26,200 | 30,680  | 35,160  | 39,640  | 44,120  |
|                |          | Low (80%) Income Limits (\$)      | 40,750 | 46,550 | 52,350 | 58,150 | 62,850  | 67,500  | 72,150  | 76,800  |
|                |          | Persons in Household              |        |        |        |        |         |         |         |         |
|                |          | 1                                 | 2      | 3      | 4      | 5      | 6       | 7       | 8       |         |
| Gulf County    | \$59,300 | Very Low (50%) Income Limits (\$) | 20,550 | 23,500 | 26,450 | 29,350 | 31,700  | 34,050  | 36,400  | 38,750  |
|                |          | Extremely Low Income Limits (\$)* | 12,760 | 17,240 | 21,720 | 26,200 | 30,680  | 34,050* | 36,400* | 38,750* |
|                |          | Low (80%) Income Limits (\$)      | 32,900 | 37,600 | 42,300 | 46,950 | 50,750  | 54,500  | 58,250  | 62,000  |
|                |          | Persons in Household              |        |        |        |        |         |         |         |         |
|                |          | 1                                 | 2      | 3      | 4      | 5      | 6       | 7       | 8       |         |
| Holmes County  | \$51,600 | Very Low (50%) Income Limits (\$) | 18,500 | 21,150 | 23,800 | 26,400 | 28,550  | 30,650  | 32,750  | 34,850  |
|                |          | Extremely Low Income Limits (\$)* | 12,760 | 17,240 | 21,720 | 26,200 | 28,550* | 30,650* | 32,750* | 34,850* |
|                |          | Low (80%) Income Limits (\$)      | 29,600 | 33,800 | 38,050 | 42,250 | 45,650  | 49,050  | 52,400  | 55,800  |
|                |          | Persons in Household              |        |        |        |        |         |         |         |         |
|                |          | 1                                 | 2      | 3      | 4      | 5      | 6       | 7       | 8       |         |
|                |          | Very Low (50%) Income Limits (\$) | 18,500 | 21,150 | 23,800 | 26,400 | 28,550  | 30,650  | 32,750  | 34,850  |

**Hurricane Michael Workforce Recovery Training Program Guidelines**

|                |          |                                   |        |        |        |        |         |         |         |         |
|----------------|----------|-----------------------------------|--------|--------|--------|--------|---------|---------|---------|---------|
| Jackson County | \$51,000 | Extremely Low Income Limits (\$)* | 12,760 | 17,240 | 21,720 | 26,200 | 28,550* | 30,650* | 32,750* | 34,850* |
|                |          | Low (80%) Income Limits (\$)      | 29,600 | 33,800 | 38,050 | 42,250 | 45,650  | 49,050  | 52,400  | 55,800  |
|                |          | Persons in Household              | 1      | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Leon County    | \$72,700 | Very Low (50%) Income Limits (\$) | 25,450 | 29,100 | 32,750 | 36,350 | 39,300  | 42,200  | 45,100  | 48,000  |
|                |          | Extremely Low Income Limits (\$)* | 15,300 | 17,450 | 21,720 | 26,200 | 30,680  | 35,160  | 39,640  | 44,120  |
|                |          | Low (80%) Income Limits (\$)      | 40,750 | 46,550 | 52,350 | 58,150 | 62,850  | 67,500  | 72,150  | 76,800  |
|                |          | Persons in Household              | 1      | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Liberty County | \$44,500 | Very Low (50%) Income Limits (\$) | 18,500 | 21,150 | 23,800 | 26,400 | 28,550  | 30,650  | 32,750  | 34,850  |
|                |          | Extremely Low Income Limits (\$)* | 12,760 | 17,240 | 21,720 | 26,200 | 28,550* | 30,650* | 32,750* | 34,850* |
|                |          | Low (80%) Income Limits (\$)      | 29,600 | 33,800 | 38,050 | 42,250 | 45,650  | 49,050  | 52,400  | 55,800  |
|                |          | Persons in Household              | 1      | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Taylor County  | \$49,100 | Very Low (50%) Income Limits (\$) | 18,500 | 21,150 | 23,800 | 26,400 | 28,550  | 30,650  | 32,750  | 34,850  |
|                |          | Extremely Low Income Limits (\$)* | 12,760 | 17,240 | 21,720 | 26,200 | 28,550* | 30,650* | 32,750* | 34,850* |
|                |          | Low (80%) Income Limits (\$)      | 29,600 | 33,800 | 38,050 | 42,250 | 45,650  | 49,050  | 52,400  | 55,800  |
|                |          | Persons in Household              | 1      | 2      | 3      | 4      | 5       | 6       | 7       | 8       |

**Hurricane Michael Workforce Recovery Training Program Guidelines**

|                   |          |                                   | Persons in Household |        |        |        |         |         |         |         |
|-------------------|----------|-----------------------------------|----------------------|--------|--------|--------|---------|---------|---------|---------|
|                   |          |                                   | 1                    | 2      | 3      | 4      | 5       | 6       | 7       | 8       |
| Wakulla County    | \$70,000 | Very Low (50%) Income Limits (\$) | 24,450               | 27,950 | 31,450 | 34,900 | 37,700  | 40,500  | 43,300  | 46,100  |
|                   |          | Extremely Low Income Limits (\$)* | 14,700               | 17,240 | 21,720 | 26,200 | 30,680  | 35,160  | 39,640  | 44,120  |
|                   |          | Low (80%) Income Limits (\$)      | 39,100               | 44,700 | 50,300 | 55,850 | 60,350  | 64,800  | 69,300  | 73,750  |
|                   |          |                                   |                      |        |        |        |         |         |         |         |
| Washington County | \$50,700 | Very Low (50%) Income Limits (\$) | 18,500               | 21,150 | 23,800 | 26,400 | 28,550  | 30,650  | 32,750  | 34,850  |
|                   |          | Extremely Low Income Limits (\$)* | 12,760               | 17,240 | 21,720 | 26,200 | 28,550* | 30,650* | 32,750* | 34,850* |
|                   |          | Low (80%) Income Limits (\$)      | 29,600               | 33,800 | 38,050 | 42,250 | 45,650  | 49,050  | 52,400  | 55,800  |

The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guidelines as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low-income limits may equal the very low (50%) income limits.