Hurricane Sally Subrecipient Onboarding Webinar

Slide 1 – Title

- Welcome to the Rebuild Florida Hurricane Sally Subrecipient Onboarding webinar and congratulations on your selection for this funding!
- This presentation will focus largely on next steps for our newly awarded subrecipients, including what to expect during the subrecipient agreement process along with the required documentation and steps that must be taken prior to implementing your projects.
- Let's make some introductions and have a look at today's agenda.

Slide 2 – Introductions

- My name is Lecia Behenna, the Bureau Chief for Business Economic Recovery for the Office of Long-Term Resiliency.
- I am joined today by Justin Domer, who serves as our Director, and Leo Garcia, our Deputy Director.
- Our Deputy Bureau Chief is Garnet Nevels.
- Jody McCormick is our Grants Coordinator.
- The Program Managers who will be overseeing Sally-related programs are:
 - Amanda Iscrupe, Infrastructure Manager;
 - Anastasia Smith, Subrecipient Housing Manager;
 - and David Dempsey, Manager of Economic Revitalization projects.
- Along with these essential team members, each subrecipient will also be assigned a Grant Manager.

Slide 3 – Agenda

- Today, we will begin with a review of the Hurricane Sally programs and requirements.
- Subrecipient Agreement Process, responsibilities, and components.
- Procurement and Environmental Review Requirements all subrecipients must comply with federal procurement and environmental review regulations on every project.
- Crosscutting requirements including the Uniform Relocation Act of 1970 & Acquisition regulations, Section 3 requirements, labor standards, and Civil Rights compliance.
- Reporting requirements and Financial Management protocols.
- Recordkeeping;
- Conflict of Interest; and
- Next Steps.
- If you have any questions throughout the presentation, please use the webinar's chat feature, which we will monitor. We will respond to your questions during our Q & A session at the end of the presentation.
- Please reach out to your assigned Grant Manager with any questions not answered today and for information specific to your project(s).
- This presentation will be available on our Hurricane Sally website.

Slide 4 – Hurricane Sally Subrecipient Programs

- Hurricane Sally made landfall as a Category 2 storm, in Gulf Shores, Alabama on September 16, 2020.
- Because of Sally's asymmetrical structure, communities in northwest Florida suffered the brunt of the storm.
- Heavy rainfall and flooding caused damage to housing, businesses, and infrastructure in Escambia, Santa Rosa, Bay, Okaloosa, and Walton Counties.
- As a result, based on unmet needs assessments, FloridaCommerce launched subrecipient programs to address infrastructure repairs, voluntary home buyouts, hometown revitalization, housing repair and replacements, and workforce recovery training.
- In January of this year, the application process began for a total of \$177.5 million dollars available for recovery and mitigation funding.
- Final award recipients were announced by Governor DeSantis in July.

Slide 5 – Subrecipient Process

- This slide illustrates the lifecycle of subrecipient projects.
- FloridaCommerce and its subrecipients are partners throughout this process and must coordinate throughout all stages of it.
- We are currently in the Subrecipient Agreement process phase, indicated in solid blue on the graphic.
- Following the application cycle and verification of subrecipient's compliance with National Objectives, a detailed Scope of Work is finalized, and an Agreement is executed.
- Subrecipients are responsible for submitting documentation to illustrate compliance with the terms of the Agreement and federal regulations.
- This includes procurement plans and environmental reviews.
- After these requirements are fulfilled, the subrecipient receives authority to use grant funds.
- This is when project implementation can begin. FloridaCommerce reimburses for costs incurred and documented as submitted by each subrecipient.
- Finally, as the projects wrap up, we go through the closeout process.
- Throughout the life of an Agreement, Grant Managers communicate at least bi-weekly with their Subrecipients' designated contacts.

Slide 6 – Subrecipient Responsibilities

- Subrecipients must comply with federal regulations related to:
- Procurement;
- Environmental Reviews;
- Federal Requirements; and
- Financial Management.
- Subrecipients must also:

- Maintain program records, monitor contractors and activity progress, and achieve performance goals.
- These responsibilities are detailed in subrecipient agreements, the Federal Register, the Code of Federal Regulations, the Disaster Recovery Action Plan, Program Guidelines, and Policy & Procedure Manuals. Links to these resources are on our website.

Slide 7 – Subrecipient Agreement Components

- Now let's take a closer look at the Subrecipient Agreement.
- Each subrecipient agreement contains the grant's general terms and conditions as well as 13 attachments.
- Subrecipients should read through the agreement and all attachments carefully. We will give a brief overview of each attachment and review attachments A, B and C in more detail today.
- Attachment A the Scope of Work will identify both your roles and responsibilities and FloridaCommerce's roles and responsibilities.
- Attachment B Is a detailed budget, tied to both a national objective and project outcomes.
- Attachment C Is your Activity Workplan a detailed timeline of project activities.
- Attachment D Program and Special Conditions, details federal regulatory compliance requirements as well as requirements for coordination with FloridaCommerce. This attachment includes information on Uniform Relocation Assistance requirements, Section 3 compliance, and Fair Housing requirements. (It should be noted that all activities, even infrastructure activities, have some fair housing requirements.)
- Attachment E encompasses the State and Federal Statutes, Regulations, and Policies including requirements related to audits, inspections, and monitoring, as well as federal regulations regarding procurement, property standards, non-discrimination, and labor standards.
- Attachment F Civil Rights Compliance, provides detail on fair housing requirements, equal employment opportunity, civil rights for persons with disabilities, Section 3, which addresses creating economic opportunities for LMI persons, and federal civil rights laws and regulations.
- Attachment G provides detail on all required reporting and timeframes associated with submitting the reports.

Slide 8 – Subrecipient Agreement Components

- Attachment H includes Warranties and Representations, and details financial management requirements as well as conditions for program implementation.
- Attachment I describes audit requirements with specifics on audits and monitoring, The exhibit to this attachment is for providing detail on any matching funds to be used in the implementation of your project.
- Attachment J is the Audit Compliance Certification. This certification must be submitted within 60 days of the end of each fiscal year in which the subrecipient grant was opened.
- Attachment K is the SERA Access Authorization Form. SERA is the Subrecipient Enterprise Resource Application. It is the system all subrecipients will use for invoice submission.
- Attachment L is 2 CFR Appendix II to Part 200 which are the required contract provisions for all non-federal entities that have received a federal award.

 And last, Attachment M – is a Subrogation Agreement which is related to duplication of benefits and ensuring that CDBG-DR funds are not replacing or supplanting any previously received or existing project funds.

Slide 9 – National Objective

- Something we will reiterate throughout the subrecipient process is that all CDBG-DR-funded activities must meet at least one national objective, and this must be documented.
- If an activity is eligible but does not meet a national objective benefiting LMI persons, addressing an urgent need, and/or eliminating slum and blight, funding may be subject to recapture.
- The slum & blight National Objective option is only available for Hometown Revitalization projects.

Slide 10 – Scope of Work

- We are now going to highlight Attachments A, B, and C of the Agreement.
- These are the scope of work, the budget template, and the work plan template.
- The scope of work includes the project description, subrecipient and FloridaCommerce roles and responsibilities, and project deliverables & tasks.
- The subrecipient responsibilities section is one that you should spend time closely reviewing, as it includes details on documentation that must be submitted within the first 30 days of the of agreement execution.
- We will review these documentation requirements in detail later in this presentation.

Slide 11 – Deliverables, Tasks and Financial Consequences

- Scope of Work deliverables will be detailed in a format like the one shown here.
- Subrecipients, in coordination with FloridaCommerce, will establish these deliverables, each of which include specific tasks, minimum levels of service, and financial consequences for not meeting minimum levels of service.
- This document also includes the costs associated with each deliverable and outlines required start-up documentation.

Slide 12 – Submission Timeline

- Attachment A outlines required start-up documentation. Within 30 days of subrecipient agreement execution, subrecipients must submit the following to FloridaCommerce:
- Updated Attachments B (Budget) and C (Workplan);
- An Organizational Chart;
- Job Descriptions of Project Management Team;
- Procurement Policies and Procedures;
- Administrative Financial Management Policies;
- Quality Assurance and Quality Control System Policies and Procedures;
- The Project Detail Budget; and
- An Activity Work Plan.

- All subrecipients will be required to complete an environmental review prior to the start of project activities. We will discuss the details of the environmental exemption for administrative/professional service activities as well as the full environmental review requirements later in this presentation.
- Professional services contracts must also be approved by FloridaCommerce and should be submitted to the agency as soon as possible. Any new procurements that will be initiated after the execution of the subrecipient agreement must be submitted to FloridaCommerce at least 10 days prior to posting for review.
- Subrecipients are required to attend HUD OIG's Fraud, Waste, and Abuse Training, as that training is available. Documentation of attendance must then be submitted to FloridaCommerce. The training is a two-day event that is only offered in person. At least one person from your management team must attend.
- The next available Fraud, Waste, and Abuse training dates are August 29 30 in Biloxi, MS. You may contact Allison Bryant at <u>Allison.Bryant@Commerce.fl.gov</u> for training questions and registration information.
- Finally, SERA, which stands for Subrecipient Enterprise Resource Application, is the system for tracking project financial activities and requesting reimbursements and storing documents. FloridaCommerce will provide SERA training and access after contract execution.

Slide 14 - Project Budget - Attachment B

- You've already seen a version of this budget template during the application process. Attachment B in the subrecipient agreement will include detail on your approved budget. Preparing the budget will require the subrecipient to provide:
 - The name of Activity and Project;
 - The National Objective(s);
 - The project beneficiaries; and
 - The budget by activity.
- The budget must also be broken out by CDBG-DR funding and any other sources of funding that will support the overall project costs.
- The budget amount must be equal to what is reported in the activity work plan and the original award amount.
- If changes to your budget are required at any point, **your Grant Manager must be notified** first to assist you with the process.

Slide 15 – Activity Work Plan – Attachment C

 You also saw Attachment C – the Activity Work Plan, during the application process. Anticipated start and end dates, as well as outcomes will be included in your workplan. The workplan should include sufficient detail to allow both the subrecipient and FloridaCommerce to be able to monitor progress throughout implementation and to identify potential delays before they become problematic. • Please know that Attachments B and C are "living documents" that can and should be modified, with program approval, in the event that budgets and schedules have to be amended due to funding modifications or unforeseen circumstances.

Slide 16 – Procurement Requirements

- The Code of Federal Regulations details the procurement requirements using federal funds in 2 CFR 200. 2 CFR 200 also addresses the real property requirements, which may be triggered depending on the nature of the project activity.
- All subrecipients should familiarize themselves with these requirements by reading the relevant sections of the Code of Federal Regulations.
- Subrecipients must have or adopt procurement policies specific to CDBG-DR federal awards.
- It is also important to recognize that local procurement policies may not always align with these federal requirements. If this is the case, subrecipients should always **comply with the most restrictive requirement.**
- For example, under federal regulations, procurements over \$150,000 require a public solicitation/bidding process. However, many local procurement policies require a public solicitation process at amounts closer to \$20,000. If that is the case, you must comply with your local public solicitation threshold, as it is more restrictive.

Slide 17 – Procurement Requirements

- Here are some important highlights from the 2 CFR 200 procurements requirements.
- The "Simplified Acquisition Threshold", for Hurricane Sally CDBG-DR projects is set at \$250,000. The federal micro-purchase threshold is set at \$10,000.
- Subrecipients must take (and document) all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.
- An Independent Cost Analysis must be completed in connection with every procurement as it is required of all procurement actions under HUD.
- All CDBG-DR expenses must be deemed necessary and reasonable. A cost or price analysis
 is a required step and documentation to show that expenses are reasonable is required. The
 method and degree of analysis is dependent on the facts surrounding the particular
 procurement situation, but as a starting point, the non-federal entity must make independent
 estimates before receiving bids or proposals.
- Subrecipients may *not* use cost-plus-percentage-of-cost or percentage-of-construction-costs methods of contracting. These are ineligible, and any contracts structured in this manner cannot be reimbursed with CDBG-DR funds.
- And finally, contractors that have been debarred, suspended, or are otherwise ineligible to receive federal funds cannot be awarded contracts that will be reimbursed with CDBG-DR funds. To verify that there are no such exclusions, subrecipients can easily run a check on SAM.gov, the system for award management. A copy of the sam.gov Debarment Report should be retained in your files. The report must show that the contractor has an active registration and is not excluded from receiving federal funds.

• This is a sample of what the first portion of a multi-page Sam.gov Debarment Report looks like. The full report will include the company name, address, registration status, and eligibility status.

Slide 19 – Procurement and Contract Files

- Subrecipients must maintain complete procurement and contract files for all CDBG-DR funded contracts. This includes, but isn't limited to:
 - Copy of public notice;
 - Copies of RFPs and RFQs;
 - Evaluation documentation (such as rating matrices and bid tabs);
 - Copies of all proposals and/or bids;
 - SAM.gov debarment checks; and
 - Contract documents.
- During HUD monitorings and audits, procurement files are often reviewed. It is essential that subrecipients maintain complete procurement files to avoid any potential findings of non-compliance.
- Subrecipients must obtain FloridaCommerce's approval for all professional services and construction contracts and/or agreements that will be reimbursed with CDBG-DR funds. Planned procurements must be submitted to FloridaCommerce at least 10 days prior to posting.

Slide 20 - Environmental Review Requirements

- All CDBG-DR projects require some level of environmental review in accordance with the National Environmental Policy Act (NEPA) and 24 CFR Part 58, regardless of project scale or environmental impact.
- All subrecipients must complete an Exempt or Categorically-Excluded Form, even if their project is determined to have no adverse environmental or health effects on end users.
- HUD environmental review requirements are rigorous and demonstrating compliance can be complex for some projects. Allow for the time and budget necessary to complete the process and seek guidance early if needed.
- It is important to remember that CDBG-DR funds cannot be spent, construction cannot begin, you may not acquire property, and you may not conduct any choice-limiting work until your agreement is executed, the environmental review is completed and approved by FloridaCommerce's Environmental Team, and an Authority to Use Grant Funds (AUGF) has been issued.
- Prior to receiving the AUGF, the only expenses a subrecipient can incur are for soft costs such as administration and engineering. No reimbursements for allowable soft costs can happen before the AUGF has been issued.

- There are several levels of environmental review, depending on the nature of the proposed activity. As the complexity of the project increase, so does the potential for environmental impacts and the level of environmental review required. Your Grant Manager and an assigned member of FloridaCommerce's Environmental Team will provide guidance through the process. The levels of review are:
 - Exempt activities include planning, services, and administrative costs and other activities with limited to no potential for environmental impacts.
 - Categorically-Excluded and Not Subject to Related Laws and Authorities (CE<u>N</u>ST) are activities such as tenant-based rental assistance, operating costs, maintenance. The review process for Exempt and CENST project is the same.
 - Categorically-Excluded but Subject to Related environmental Laws and Authorities (CEST) reviews are required for projects with a potential for limited environmental impacts, including acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements.
 - Most other projects (not exempt or categorically-excluded) require an Environmental Assessment (EA). These include projects involving new construction or major improvements to existing structures or facilities that result in an increased size or capacity of the structure, facility, or system. Projects that result in a change in the use of the property between vacant, residential, commercial and industrial also require and EA.
 - Although exceedingly rare for CDBG-DR projects, some activities that have to potential for a significant environmental impact require an Environmental Impact Statement (EIS). Subrecipients who believe their project may require an EIS should contact FloridaCommerce immediately for guidance.
 - An Authority to Use Grant Funds will be issued *after* environmental review requirements have been met and approved by FloridaCommerce.

Slide 22 – Uniform Relocation Assistance (URA) & Real Property Acquisition

- Let's move now to a brief overview of cross-cutting and federal requirements starting with the Uniform Relocation Assistance and Acquisition requirements.
- The URA generally applies to activities that require the acquisition of property using federal funding.
- Do not acquire property before contacting your Grant Manager.
- If a Subrecipient undertakes any activity subject to URA, they must show evidence of completion of the acquisition by submitting all required documentation. (FloridaCommerce will provide a checklist of what is needed – which will be similar to the list on this slide.)
- The required documentation must be submitted *prior to* completing the acquisition (closing) so that FloridaCommerce can determine whether any remedial action may be needed.
- Subrecipients must provide relocation assistance to displaced persons if they are displaced as a direct result of acquisition, rehabilitation, demolition, or conversion for a CDBG-assisted project.

- Federal regulations require compliance with Section 3 requirements.
- Section 3 helps foster local economic development, neighborhood economic improvement and individual self-sufficiency. Compliance is required for HUD construction contracts over \$200,000.
- FloridaCommerce's policy is to ensure that economic opportunities generated from HUDfunded projects, are directed, to the greatest extent possible, to low- and very low-income persons and to businesses that provide opportunities for such individuals.
- Detailed Section 3 compliance requirements are included in the subrecipient agreement.

Slide 24 – Labor Standards

- CDBG-funded infrastructure projects will most likely trigger Davis Bacon prevailing wage requirements. These require that contractors working on federally-funded contracts in excess of \$2,000 for construction, alteration, or repair - pay wages at rates not less than those prevailing on similar construction in the locality, as determined by the U.S. Department of Labor. Evidence of wage determinations must be documented.
 - Wage classifications and rates must be determined prior to contract execution with contractors and included in any construction contracts.
- These projects also trigger the Copeland anti-kickback act, which prohibits contractors from inducing an employee to give up any part of the compensation that he or she is entitled to under the terms of his or her employment contract.
 - Weekly certified payrolls are required for these contracts, and the subrecipient must collect and review these from all contractors. These will be submitted to FloridaCommerce as documentation supporting invoice requests.
- Another labor standard is the Contract Work Hours and Safety Standards Act, also known as CWHSSA, which requires contractors to provide overtime compensation equal to time-and-a-half pay to any laborer who works more than 40 hours in a week.

Slide 25 - Civil Rights Compliance

- Attachment F in the Subrecipient Agreement details Civil Rights Compliance requirements for subrecipients. Requirements can also be found on the Sally Disaster Recovery webpage by clicking the link to the Policy Manual for storms in 2020 and later.
 - Compliance includes Fair Housing. Each Subrecipient must certify that it will "affirmatively further fair housing" in its community and undertake an activity each quarter to further fair housing.
 - Subrecipients are subject to Equal Employment Opportunity regulations, a family of laws that prohibit discrimination against protected classes of people.
 - Also in the realm of Civil Rights compliance are Section 504 and the Americans with Disabilities Acts, which address accessibility and state that "No otherwise qualified individual shall, solely by reason of his or her handicap, be excluded from participation (including employment), denied program benefits, or subjected to discrimination".
- Let's shift our review now to the topic of reporting requirements.

- There are two main recurring program reports monthly and quarterly.
 - Monthly Progress Reports must be submitted to FloridaCommerce by the 5th day of every month.
 - **Quarterly Progress Reports** must be submitted to FloridaCommerce no later than the <u>5th of every April, July, October, and January</u>. Reports must include the Fair Housing activities completed for the quarter.
 - These reports focus on expenditures and activity progress.
- Additionally, subrecipients must submit regular requests for reimbursement of funds, called Financial Activity or FAs, in accordance with their Project Description and Deliverables, Budget, and Activity Work Plan.

Slide 27 - Required Reports - By Fiscal Year

- Annual reporting occurs in accordance with the subrecipient's fiscal year or calendar year. By fiscal year is:
 - The **Single Audit** report applies if the subrecipient meets the \$750,000 threshold. For submission of a single or program-specific audit, subrecipients must conduct and submit this audit report to FloridaCommerce no later than nine months from the end of their fiscal year. The term "threshold" includes a combination of all state financial assistance (FloridaCommerce and elsewhere) received in a single fiscal year.
 - If Subrecipient does not meet the audit threshold, an **Audit Certification Memo** must be provided to FloridaCommerce no later than nine months from the end of their fiscal year.

The Audit Compliance Certification form, Attachment J, must be emailed to audit@Commerce.Fl.gov within 60 calendar days of the end of each fiscal year in which the subgrant was opened.

Slide 28 – Financial Management

- Let's take a look now at Financial Management highlights.
 - Rebuild Florida is a cost-reimbursement program unless otherwise defined in HB 1209.
 - The frequency of your Request for Funds is determined by your Subrecipient Agreement.
 - Requests for Funds must be submitted through SERA and must include the following documentation:
 - Request for Funds Form (provided by FloridaCommerce);
 - Contractor invoices;
 - Employee timesheets;
 - Proof of payment: cancelled checks, bank statements, Electronic Funds Transfer, payrolls, time and attendance records; and
 - Documentation of completed deliverables.

- Any program income generated by CDBG-DR-funded activities must be managed in accordance with federal regulations.
- Subrecipients must report all program income generated by activities carried out with CDBG-DR funds as part their Quarterly Progress Report.
- If applicable, subrecipients shall use program income in accordance with the applicable requirements of the Code of Federal Regulations and the terms of the Subrecipient Agreement.
- Program income generated prior to closeout is to be returned to FloridaCommerce unless the income is used to fund additional units of CDBG-DR activities that are specified in an agreement modification and executed prior to grant closeout. Program income generated after closeout must be returned to FloridaCommerce.

Slide 30 – Recordkeeping

- Recordkeeping must be separate from operations and from handling the custody of assets. The records that should be kept are:
 - Original application and all appendices and revisions;
 - Citizen participation documentation;
 - Procurement files;
 - Financial files;
 - National objective documentation;
 - Program files, such as policies and procedures;
 - Deliverables & work products; and
 - Evidence that contractors' eligibility was verified.
- An auditor or grant manager should be able to look at your file and know what transpired from award to closeout.
- Records should be easily accessible to state and federal officials, auditors, and the public.

Slide 31 – Recordkeeping

- Take photos throughout the project. Include the project site prior to project implementation and after project completion. Photos help tell your project's story and provide evidence of the work being done and the needs being addressed.
- Retain sufficient records to demonstrate compliance with the terms of the Subrecipient Agreement for a period of five years from the date the audit report is issued, or six state fiscal years after all reporting requirements are satisfied and final payments have been received, whichever period is longer.
- Be prepared to allow FloridaCommerce, or its designee, CFO, or Auditor General access to such records upon request

- Our final topic area today is Conflicts of Interest.
- According to the Code of Federal Regulations and the Florida Statutes, the following people or their immediate family may not have any direct or indirect financial interest in any contract, subcontract, or the proceeds thereof for work to be performed in connection with the grant during their tenure or for one year thereafter.
- This applies to:
 - Employees or agents of the subrecipient who exercise any function or responsibility for the CDBG-DR project(s); and
 - Officials of the subrecipient including members of the local governing body.

Slide 33 – Conflicts of Interest

- Subrecipients should be aware of these types of conflicts of interest:
 - Beneficiary is any activity with a direct benefit. This covers anyone with a role in the CDBG-DR approval process, including Citizen Advisory Task Force members, local grant administrators, city/county manager and council/commission members.
 - Examples include housing rehabilitation or façade renovation.
 - Procurement this covers all aspects, solicitation, award, and administration.
 - *Examples include* writing selection criteria, evaluating proposals, negotiating contract and pay requests.

Any conflict or perceived conflict requires nonparticipation of the person or persons involved.

Slide 34 – Conflicts of Interest

- If you discover a conflict, you must notify your Grant Manager and:
 - Acknowledge beneficiaries by name;
 - Complete Commission on Ethics forms;
 - Get city/county attorney's opinion; and
 - Request waiver from FloridaCommerce.
- Note that a Procurement conflict cannot be waived.

Slide 35 – Next Steps

- Our next steps together will be focused on the execution of the subrecipient agreement and submission of start-up documentation. Your assigned Grant Manager will reach out to you to discuss development of the scope of work.
- Within 30 days after agreement is executed, your Grant Manager will need:
 - Your Organizational Chart;
 - Job Descriptions for your Project Management Team;
 - Your Procurement Policies and Procedures;

- Your Administrative Financial Management Policies;
- Quality Assurance and Quality Control System Policies and Procedures;
- The Project detail Budget; and
- A final Activity Work Plan.
- And we recommend as soon as possible, that you submit an Environmental Exemption Form for Administrative and Professional Service Activities.

Slide 36 – Questions and Answers

- That completes our onboarding presentation.
- We have been looking through the questions submitted during this presentation and will answer those we can get to before our time is up. If we don't get to your question today, please know that you are welcome to reach out to your FloridaCommerce contacts at any time via email or a phone call.
- A copy of this webinar will be available on the FloridaCommerce Hurricane Sally webpage.

Slide 37 – Contact Us

- If you have any questions or concerns, email the Office of Long-Term Resiliency at <u>CDBG-DR@Commerce.Fl.gov</u> or call 850-245-7105. Your Grant Manager will also provide you with his or her contact information.
- Thank you for your time today. On behalf of the Florida Commerce's Office of Long-Term Resiliency, we look forward to partnering with each of you on your projects as we strive to improve the lives and safety of Floridians!