

Substantial Amendment 10

Substantial Amendment 10, Approved by HUD 7/31/20			
Previous Page #	New Page #	Section	Change/Addition/Deletion
102	99	Projects and Activities	Modified 120% AMI to 80% AMI for eligibility for the Temporary Housing Assistance Benefit.
102	99	Projects and Activities	Changed the Temporary Housing Assistance Benefit cap from \$10,000 to \$20,000.
N/A	99	Projects and Activities	Added language that the reevaluation for continued Temporary Housing Assistance Benefit is available on a case-by-case basis following extenuating circumstances.
102-106	N/A	Projects and Activities	Removed language for rental option within the Temporary Housing Assistance Benefit (THAB). Alternative Lodging Assistance, including rental assistance, will be considered on a case-by-case basis following excessive time of displacement or other substantiated extenuating circumstances and approval from the DEO Housing Exceptions Panel.
103	100	Projects and Activities	Removed Temporary Rental Assistance and added information about Extended Temporary Hotel Assistance and Alternative Lodging Assistance.
104	101	Projects and Activities	Updated the Temporary Housing Assistance Benefit cap from \$10,000 to \$20,000 and added information explaining that the maximum may be waived in areas with spiking rates, as defined by the General Services Administration (GSA) publication, with approval on a case-by-case basis.
101	N/A	Projects and Activities	Modified Payment of Benefit section to require direct payment to the temporary housing service provider in lieu of the applicant.
105-106	101	Projects and Activities	Added language for Associated Expenses.
107	101	Projects and Activities	Added information regarding the extension of Temporary Housing Assistance Benefits.
N/A	101-102	Projects and Activities	Added clarifying language throughout the Temporary Housing Assistance Benefit's Termination or Discontinuation of Assistance section. Added language regarding the timeframes in which an applicant must vacate the temporary housing

			accommodation and reoccupy their home. The previous language did not integrate the time necessary for the applicant to vacate temporary housing and move their belongings back into their home following the final Housing Repair and Replacement Program inspection. The added language clarifies that the applicant must vacate the temporary lodging no more than five business days following the final Program inspection.
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Substantial Amendment Introduction

To avoid displacement and homelessness, DEO developed the Temporary Housing Assistance Benefit (THAB) to provide additional assistance for Housing Repair and Replacement Program (HRRP) participants who are experiencing a financial hardship. The THAB will be available, until completion of repairs to the damaged home, for participants who have been approved for rehabilitation or reconstruction assistance and have signed a Homeowner Grant Agreement. The THAB provides assistance under Rebuild Florida's HRRP for unmet needs related to eligible short-term lodging expenses, for up to 6 months, provided the household is at or below 80% AMI and is a beneficiary also receiving assistance for the rehabilitation, reconstruction or replacement of their Irma damaged property. Applicants deemed qualified to receive the THAB benefit pursuant to earlier income limits will be authorized to continue to receive the benefit throughout the duration of their housing recovery project.

In order to mitigate the risk of fraud, waste, or abuse to occur, HRRP guidelines have been modified to require direct payment to the temporary housing service provider, in lieu of the applicant. Due to the ease of electronic payment processing and broad availability of short-term and extended stay hotels throughout Florida, temporary hotel assistance is the preferred method for procuring temporary housing services. Extended temporary hotel assistance, as well as alternative lodging assistance, remains available when warranted due to length of stay or other extenuating factors such as family size or mobility limitations.

Lodging rates may fluctuate based on seasonal demand or geographic location. In order to accommodate hotel stays up to ninety (90) days, the Temporary Housing Assistance Benefit cap has been increased to \$20,000.

Temporary Housing Assistance Benefit (THAB)

Overview

As a general rule, Rebuild Florida's Housing Repair and Replacement Program (HRRP) will not provide temporary relocation costs to applicants who will be required to vacate their property during construction activities. Since this is a voluntary program and applicants are made aware of program policies at the time of application, the temporary relocation requirement will be the applicant's responsibility.

DEO's Rebuild Florida program recognizes that some HRRP beneficiaries, particularly those of modest means and with vulnerable household members, may face financial cash flow challenges caused by the additional interim housing costs that may be necessary during the repair or reconstruction process. Rebuild Florida will provide temporary rental assistance to homeowner applicants experiencing hardship, on a case-by-case basis following excessive time of displacement or other substantiated extenuating circumstances and approval from the DEO Housing Exceptions Panel. This procedure identifies how this process will be implemented to identify appropriate cases to be temporary housing costs.

Demonstrable hardships may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. None of the listed examples above, individually or taken together, automatically establish a demonstrable hardship, nor is the listing above exhaustive as there may be other factors relevant to the issue of demonstrable hardship in a particular case. If an applicant believes that they are in the state of demonstrable hardship and that the demonstrable hardship causes them to not comply with program policies, then they may present their evidence of a demonstrable hardship to their Intake Specialist and request temporary housing assistance. The Program will evaluate temporary housing requests on a case-by-case basis after review of all of the circumstances.

To avoid displacement and homelessness, DEO has developed the **Temporary Housing Assistance Benefit (THAB)** to provide additional assistance for HRRP participants who are experiencing a financial hardship. The THAB will be available, until completion of repairs to the damaged home, for participants who have been approved for rehabilitation or reconstruction assistance and have signed a Homeowner Grant Agreement. The THAB provides assistance under Rebuild Florida's HRRP for unmet needs related to eligible short-term lodging expenses, for up to 6 months, provided the household is at or below **80% AMI** and is a beneficiary also receiving assistance for the rehabilitation, reconstruction or replacement of their Irma damaged property.

The THAB is a housing assistance benefit not directly resulting in the rehabilitation, replacement or reconstruction of a home. Therefore, THAB does not count against the program cap for rehabilitation, replacement or reconstruction of the home. The program construction cap identified in the Action Plan applies to hard and soft construction costs associated with the Irma repairs. THAB will be capped at a maximum of **\$20,000.00** in Program sponsored payments. Construction delays for which the DEO assigned construction contractor is responsible may result in contractor responsibility for provisions of additional rental assistance and this additional assistance is not limited by the THAB cap.

Homeowners who choose to stay with friends or family in lieu of staying in a hotel or a short-term leased apartment are not eligible for THAB payments. Further, any homeowner who initially utilizes THAB assistance for a hotel or a short-term leased apartment and subsequently abandons the temporary housing situation to stay with friends or

family will have all future THAB payments terminated.

Temporary Housing Assistance Benefit (THAB)

The Temporary Housing Assistance Benefit (THAB) allows short-term lodging in the form of temporary hotel assistance for up to an estimated 90 days. **Reevaluation for continued assistance is available on a case-by-case basis following extenuating circumstances.** This may be available for eligible HRRP homeowners who:

1. Have household incomes at or below **80% AMI**,
2. Have executed a Rebuild Florida HRRP grant agreement but construction has not been completed,
3. Require temporary housing due to other circumstances of hardship, as approved by the Florida Department of Economic Opportunity (DEO), including temporary displacement that requires that the damaged home be vacated for safety and other reasonable measures during construction, and
4. Will stay in a hotel, motel, or extended stay hotel **unless alternative arrangements (e.g., short-term leased apartment) are needed due to excessive length of displacement**

THAB Eligibility

In addition to the criteria listed above, the following eligibility criteria also applies:

1. Must be an active applicant in the HRRP. "Active" participants are defined as HRRP homeowners who are post-closing, meaning have executed their Homeowner Grant Agreement (HGA). This means that the THAB will only be provided for applicants in the active construction phase.
2. Homeowner cannot receive concurrent temporary lodging or rental assistance from other governmental or charitable organization that would cause a duplicative benefit.
3. If the homeowner received any rental assistance from FEMA, Tenant-Based Rental Assistance (TBRA), Project-Based Rental Assistance (PBRA), or Section 8 Housing, the funding must have been exhausted prior to provision of CDBG-DR **THAB** funds.
4. Funds must be used for lodging and cannot be used for any other purpose.

The THAB is not a duplication of benefits to housing rehabilitation, repair or reconstruction funds, as it constitutes a separate and distinct eligible activity.

THAB Assistance Types

The Temporary Housing Assistance Benefit is dependent on the homeowner's needs, which will be identified and confirmed by Rebuild Florida HRRP intake specialists to determine the best and most reasonable options available to homeowners. The THAB may be provided in the form of temporary lodging in units such as hotels, motels or extended stay hotels, intended not to exceed 90 days. The benefit will be calculated based on the Government Services Agency (GSA) lodging rates for the homeowner's area. GSA rates can be found at <https://www.gsa.gov/travel/plan-book/per-diem-rates>.

1. **Temporary Hotel Assistance:** In order to avoid homelessness and undue financial burden, some homeowners need temporary hotel assistance (estimated not to exceed 90 days) to complete construction on their homes. This program will provide funding for temporary hotel lodging for these families for up to an estimated 90 days until construction is complete.

2. **Extended Temporary Hotel Assistance:** In the event that the construction contractor notifies DEO that the project will exceed the original schedule and a homeowner will not be able to reoccupy his or her home due to construction timelines that exceed the initial assistance, an extension of benefits may be issued to prevent homelessness or additional undue financial burden. The extension will be granted based on a new estimated timeline from the construction contractor.
3. **Alternative Lodging Assistance:** In cases where the duration of estimated displacement exceeds 90 days or other extenuating factors, alternative lodging (i.e., lodging alternative to hotel, motel, extended stay hotel) may be approved on a case-by-case basis.

THAB Maximum Benefit

The THAB covers 100% of the hotel, motel, or extended stay daily or monthly rate, as noted below, without a percentage cost share required from the homeowner. The benefit is capped at a maximum of \$20,000.00. This maximum may be waived in areas with spiking rates, as defined by the General Services Administration (GSA) publication, with approval on a case-by-case basis.

Payment of Benefit

The short-term lodging assistance received through THAB is paid directly to the hotel, motel, or extended stay hotel and charged by the hotel automatically, based on hotel policy. The total benefit payment amount is calculated based on the hotel nightly rate, including taxes (and other approved fees as required) and the contractor's projected timeline to completion once the applicant has vacated the property.

Associated Expenses

Occasionally, an applicant may have difficulty in transporting their personal property out of the damaged property during construction. In this event, the applicant may request assistance in paying "associated expenses," not to exceed \$5,000. This is reserved only for cases of extreme hardship and may be used to assist applicants in moving personal property from and to the damaged location.

Extension of Benefit

If the reconstruction or rehabilitation may extend beyond the initial estimate, applicants can apply for an extension of temporary housing. Intake specialists who receive questions about extensions should direct those to temporaryhousing@rebuildflorida.gov.

Termination or Discontinuation of Assistance

THAB is only provided to homeowners who have been evaluated and found to be eligible for the Rebuild Florida Housing Repair and Replacement Program. DEO does recognize that there may be unforeseen circumstances that cause a homeowner to withdraw, become inactive or later be disqualified, after the eligibility determination and after the homeowner has agreed to proceed in the program. Though rare, these situations may occur.

- Should an eligible homeowner who has received or is receiving THAB assistance withdraw, become inactive or disqualified, THAB assistance must cease immediately upon such determination by program staff. Additionally, any amount of money paid to the homeowner for THAB assistance must be returned by the homeowner to the Florida Department of Economic Opportunity.

- Acknowledging that there may be extenuating circumstances that result in a homeowner's withdrawal or inactivity subsequent to his or her eligibility determination and agreement to participate in the program, DEO may allow an exception to the repayment policy with documented proof of and acceptance by DEO of the hardship. Policies and procedures for THAB will be updated, as needed, as the program evolves, and unforeseen situations arise.
- The program will discontinue temporary housing assistance if a homeowner is post-closing (has executed their grant agreement) and fails to move out of the property in a timely manner to allow construction activities to begin.
- If a homeowner fails to check-in to their reservation, the HRRP will attempt to contact the homeowner. If, after 24 hours following contact attempt, the homeowner has not provided a reasonable cause for missing their check-in date/time, the HRRP may terminate assistance. This will be evaluated on a case-by-case basis to mitigate wasteful spending.
- If a homeowner is negligent or causes damage to the temporary lodging, the HRRP will immediately notify the homeowner and terminate assistance. The homeowner will be responsible for the cost of all damages.
- When the project contractors have notified the applicant that it is safe to move back into the home, the applicant should begin moving their belongings from the Portable On Demand (POD) Storage Container into their home. Once the move is finished, the applicant must check out of their temporary housing accommodation. This process should be completed no more than five business days following the final Program inspection. After check-out, a final folio will be requested by the Temporary Housing team, and no further charges will be permitted.
- If the homeowner chooses to stay with friends or family in lieu of staying in a hotel, the homeowner is not eligible for THAB payments. Terminating occupancy of a hotel to stay with family or friends will result in termination of payments.

Upon notice of any of the above conditions, THAB recipients should be immediately provided with a Termination of Temporary Housing Notice along with instructions for appeal.

Accessibility/Disability Accommodations

Reasonable steps will be taken to accommodate accessibility and other special needs to ensure the placement is appropriate to the homeowner and the household members.

Mobile Homes and Manufactured Homes

Mobile homes or manufactured homes may be eligible for rehabilitation under this program. However, to be cost effective, the mobile home to be rehabilitated must be no more than five years old at the time of the damage assessment the repair costs necessary to rehabilitate the mobile/manufactured home must not exceed \$15,000 (hard and soft construction costs). Any mobile/manufactured home that is older than five years old at the time of the damage assessment or has an estimated repair cost greater than \$15,000 shall require the mobile/manufactured home to be replaced with another mobile/manufactured home. The home must meet HQS upon completion. If local zoning disallows replacement of a mobile home, then DEO will allow code compliant site built or modular units. Off site replacements to more safe and secure environments will be considered on a case-by-case basis. Replacement is the demolition, removal and replacement of a damaged MHU with a new MHU in