



Rebuild Florida Workforce Recovery Training Program

GUIDELINES

This document provides the guidelines for the requirements for the Hurricane Irma Workforce Recovery Training Program administered by the State of Florida Department of Commerce (FloridaCommerce). This Program is funded by the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant—Disaster Recovery (CDBG- DR) allocation as described in Public Laws 115-56 and 115-123.

VERSION 1.10

February 16, 2024

VERSION HISTORY

Version Number	Change Date	Summary of Changes
1.0	9/2019	Original Document
1.1	9/27/2019	Gaps in version history are present. In August 2021 the Office of Long-Term Resiliency's Version history policy was updated to ensure changes to program documents are recorded and noted in the applicable version history table.
1.2	10/10/2019	Gaps in version history are present. In August 2021 the Office of Long-Term Resiliency's Version history policy was updated to ensure changes to program documents are recorded and noted in the applicable version history table.
1.3	11/1/2019	Added language regarding prohibition of fees to access program services and benefits.
1.4	11/21/2019	Deleted language regarding LWDB demonstration of execution of a Grantee Sub-Grantee Agreement with FloridaCommerce within the twelve months preceding the LWDB's application for funding through the WRTP.
1.5	5/8/2020	<p>Updated income tables to include 2020 data.</p> <p>Revised record retention period from five years to six years beyond the closeout of the grant agreement.</p> <p>Removed requirement that subrecipients demonstrate that successful graduates of WRTP training are referred to businesses supported by or working on any CDBG-DR funded projects to meet their contracted Section 3 goals.</p> <p>Revised environmental review specifications.</p> <p>Revised reporting period from quarterly to monthly and revised reporting requirements.</p>
1.6	7/1/2020	<p>Updated ineligible costs.</p> <p>Updated work authorization terminology.</p>
1.7	7/2/2021	Updated contact information, updated Anti-Fraud Waste and Abuse policy.
1.8	8/18/2021	Reformatted document for program-wide consistency.
1.9	1/25/2022	Appendix A - HUD Income Limits updated with FY 2021 Income Limits.
1.10	2/16/2024	<p>As of July 1, 2023, and per Florida HB 5, ch. 2023-173, L.O.F. the former Florida Department of Economic Opportunity has been renamed the Florida Department of Commerce, referred to as "FloridaCommerce."</p> <p>To reflect this change, all references to the former Florida Department of Economic Opportunity (including "the Department" and "DEO") have been updated to represent FloridaCommerce. Associated branding (including logos, fonts, and colors) has been updated throughout the document.</p>

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		<p>Included Urgent Need as an approved National Objective.</p> <p>Expanded language in 2.2 National Objective and added information from the previously duplicative (now removed) section 2.10 National Objective.</p> <p>Split 2.3 Eligible Activities into a separate section (previously combined with 2.2 National Objective), shifting all numbered sections down one.</p>
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VERSION POLICY

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

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

POLICY CHANGE CONTROL

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

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1.0 Definitions

Action Plan: The State of Florida Action Plan for Disaster Recovery (Action Plan) details the unmet needs remaining from Hurricane Irma and the programs that the state will implement to address the unmet needs for Floridians to recover from the storm.

Applicant: Any entity that submits a response to the request for applications (RFA) for potential funding through the WRTP.

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

CDBG-DR: Community Development Block Grant - Disaster Recovery.

Department of Commerce (FloridaCommerce): Administrator of a CDBG-DR program funded by HUD under Public Laws 115-56 and 115-123. FloridaCommerce is the agency responsible for the administration of disaster funds allocated to housing, economic development, and infrastructure activities.

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

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: The official journal of the Federal government of the United States that contains government agency rules, proposed rules, and public notices. It is published daily, except on Federal holidays. 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.

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

Household: All persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a single family, two or more families living together, or any other group of related or unrelated persons who share living arrangements. For workforce training activities, the test of meeting low- and -moderate income requirements is based on the income of the household.

HUD: United States Department of Housing and Urban Development.

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. The local board serves as a strategic leader and convener of local workforce development system stakeholders, including employers, to develop and implement policies and investments that support the regional economy. The local board is responsible for establishing and maintaining a high-quality, customer-centered service delivery system and provides oversight over its workforce development system (20 CFR 679.300).

Low- and Moderate- Income (LMI) Household: 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 family size. Income eligibility will be determined and verified in accordance with HUD guidance. The most current income limits, published annually by HUD, will be used to verify the income eligibility of each household applying for assistance at the time assistance is provided.

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

Low- and Moderate- Income (LMI) Person: A member of a family 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 families 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 Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami-Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Lucie, and Volusia counties; and zip codes 32084, 32091, 32136, 32145, 32771, 33440, 33523, 33825, 33870, 33935, and 34266. The state-identified MID areas also include those counties that received both Individual Assistance (IA) and Public Assistance (PA) through the Federal Emergency Management Agency (FEMA).

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

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

Response: Any application for funding under the WRTP.

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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 FloridaCommerce and a subrecipient that has been awarded funding to implement a WRTP project that provides the conditions under which funds are provided and contractual obligations to which the subrecipient must adhere.

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 participant must enter into a subrogation agreement where the funding agency (FloridaCommerce) obtains the right to collect any additional disaster recovery or workforce training payments the participant receives for the same purpose after the participant has 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.

Urgent Need: A recent need that poses a serious and immediate threat to the health or welfare of the community.

2.0 Program Overview

2.1 Introduction

On September 10, 2017, Hurricane Irma made landfall on Cudjoe Key in Monroe County as a Category 4 storm. Irma then turned northward, making a second landfall near Marco Island and progressed northward through the center of the state. In the wake of this natural disaster, Florida officials and citizens came together to recover and rebuild, but significant unmet needs remain. Hurricane Irma had a significant impact on the housing supply, creating an increased demand for new construction and home repair activities, with additional impacts on commercial construction and repair activities. The increased demand for construction activities following Hurricane Irma has created or increased the supply gap in many construction occupations. Unmet needs assessments for employment show a long-term supply gap for skilled workers in several construction trades, including construction laborers, carpenters, electricians, painters, plumbers, and roofers (see Table 1). By addressing the unmet needs in the construction trades, 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.

Table 1: Selected Construction Occupations Statewide Projection and Supply Demand

Statewide 2017-2025 Projections and Supply Demand							
Occupation	2017 Employment	2025 Employment	Growth	Growth Percent	Total Job Openings	Median Wage	Long Term Supply Gap or Overage
Construction Laborers	83,289	97,474	14,185	17.0	87,430	\$13.73	Under Supplied
Carpenters	67,186	76,264	9,078	13.5	60,421	\$18.33	Under Supplied
First-Line Supervisors of Construction Trades and Extraction Workers	50,675	58,184	7,509	14.8	47,007	\$27.80	Under Supplied
Electricians	41,069	46,843	5,774	14.1	40,101	\$20.33	Under Supplied
Painters, Construction and Maintenance	32,289	37,482	5,193	16.1	29,334	\$15.27	Under Supplied
Plumbers, Pipefitters, and Steamfitters	27,243	30,300	3,057	11.2	25,685	\$19.33	Under Supplied
Roofers	21,402	25,315	3,913	18.3	22,269	\$15.70	Under Supplied

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Utilizing data from the unmet needs assessment and research on disaster recovery workforce training programs in other states, the Department of Commerce (FloridaCommerce) developed the Workforce Recovery Training Program (WRTP) to address the unmet need for skilled trades. The FloridaCommerce Office of Long-Term Resiliency (OLTR) is the administrator of a Community Development Block Grant - Disaster Recovery (CDBG-DR) program funded by the U.S. Department of Housing and Urban Development (HUD) under Public Laws 115-56 and 115-123. FloridaCommerce is the agency responsible for the administration of disaster funds allocated to housing, economic development and infrastructure activities in Florida.

Table 2: Workforce Recovery Training Program Overview

Workforce Recovery Training Program Overview	
Allocation for Activity	\$20,000,000
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 115-56 and 115-123
Applicable Federal Register Notices	83 Fed. Reg. 28 (February 9, 2018) and 83 Fed. Reg. 157 (August 14, 2018)
Applicable Presidential Disaster Declaration	FEMA 4337-DR

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

FloridaCommerce has allocated \$20,000,000 in CDBG-DR funding for the WRTP. FloridaCommerce 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 training to low- and moderate-income (LMI) individuals in the Hurricane Irma most impacted and distressed (MID) areas, primarily through job training in construction occupations. The program may include job training provided through class instruction, apprenticeships, on-the-job training, customized training, and other proposed innovative models. Support services, job readiness, and job placement assistance may also be provided. The WRTP is a public service program within FloridaCommerce’s economic revitalization activities for recovery from Hurricane Irma.

Figure 1: Preliminary Process – Application, Evaluation, and Award



Figure 2: Implementation Process – Service Delivery and Compliance



The WRTP will be delivered in a multi-step process (see Figures 1 and 2) to comply with all applicable regulations and requirements. The preliminary process includes an RFA and submission of applications by eligible entities, followed by application evaluation and scoring that results in an award of funding and execution of a subrecipient agreement. The selected subrecipients will be responsible for delivery of services to eligible participants.

During the implementation process, as seen in Figure 2, WRTP services will be provided to individual participants. Subrecipients must develop and implement policies, procedures, and processes to deliver services to eligible participants. Services may be provided by the subrecipient directly or in partnership with governmental, private sector, or non-profit partners. At the conclusion of the term specified in the subrecipient agreement, the grant will be closed. FloridaCommerce, with support provided by its designated partners, will monitor subrecipients throughout the life of the project.

2.2 National Objective

All activities must meet one of the National Objectives set out in the Housing and Community Development Act, with at least 70 percent of the funds going toward projects benefiting LMI persons. In the Rebuild Florida Workforce Recovery Training Program, the two National Objectives that will be addressed are:

- Benefit LMI persons; or
- Meet an urgent need.

Definitions provided in Section 102(a)(2) of the HCDA define the term “low- and moderate-income persons” as families 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 Florida.

When utilizing the LMI 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 family size and income. At least 51% 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.

2.3 Eligible Activities

Eligible activities under this program include:

- Workforce training in construction occupations, including, but not limited to:
 - Roofing;
 - Masonry;
 - Carpentry;
 - Concrete finishing;
 - Plumbing;
 - HVAC (heating, ventilation, and air conditioning);
 - Electricity;
 - Heavy equipment operations;
 - Carpet laying;
 - Glass / window installation;
 - Plastering; Welding; and
 - Customized training.
- Employment support services, including, but not limited to:
 - Peer support programs;

- Counseling;
 - English to speakers of other languages (ESOL);
 - Transportation;
 - Childcare; and
 - Computer skills / digital literacy.
- Job readiness and job placement assistance to support successful graduates of training in obtaining employment.

2.4 HUD Income Limits

HUD publishes income limits annually. The WRTP will use the published HUD income limits, including updated income tables for each year as they are made available by HUD. 2020 income limits are included in Appendix A - HUD Income Limits.

2.5 Program Requirements

- Activities for the WRTP will meet the National Objective to benefit LMI persons.
- 80% of funds must be spent in HUD-identified most impacted and distressed (MID) areas. 20% may be spent in state-identified MID areas that received both an individual assistance and public assistance declaration (see 1.6 Eligible Areas below and Appendix B: Hurricane Irma Most Impacted and Distressed Areas).
- 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. WRTP funds may not be used to supplant existing funding sources or programming.
- Applicants applying for funding through the WRTP must submit an application that meets the criteria outlined in these guidelines.
- Individuals applying for assistance through the WRTP must be screened for eligibility based on the participant eligibility criteria outlined in Part 3 of these guidelines.
- All WRTP projects must comply with all applicable federal, state, and local requirements.

2.6 Participant Application for Program Services and Benefits

- 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. Further information on accessing the participant application is outlined in section 3.1 of these guidelines.
- Qualification for assistance will be certified by subrecipient program staff prior to the commitment of training, job readiness, or other assistance to any participant.
- Individuals are not guaranteed assistance but will be served based on availability of funds and qualification for benefits.
- Applications will only be accepted during the published outreach period or until the target number of applications is received. Additional intake periods may be opened at a later date depending on funding availability for training and employment assistance for additional participants.

2.7 Priority Schedule

Participant applications will be accepted and eligibility for services and benefits determined on a priority schedule to ensure compliance with the LMI national objective, as documented in each subrecipient's

policies and procedures. Veterans and eligible veteran spouses and dependents will receive priority in accordance with federal regulations.

2.8 Eligible Areas

HUD requirements provide that at least 80% of funds must be spent in HUD-identified MID areas, including Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami-Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Lucie, and Volusia counties; and zip codes 32084, 32091, 32136, 32145, 32771, 33440,

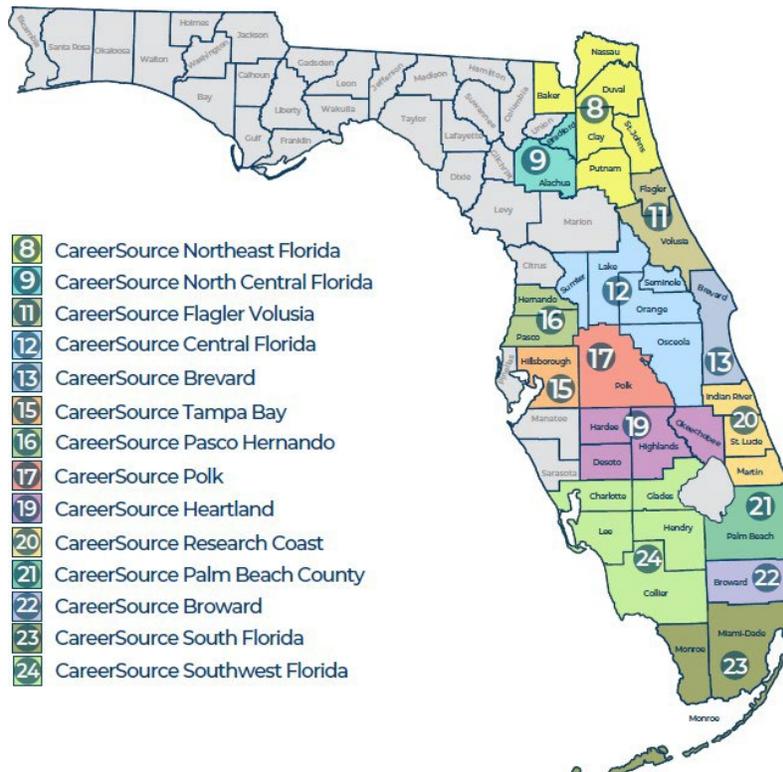
33523, 33825, 33870, 33935, and 34266. Up to 20% of funds may be spent in state-identified MID areas that received both an individual assistance and public assistance declaration. (see Appendix B – Hurricane Irma Most Impacted and Distressed Areas).

To meet this requirement, only educational institutions and technical centers located in the HUD-identified MID areas, and Local Workforce Development Boards whose service area includes the HUD-identified MID areas will be eligible to apply for funding through the WRTP. Eligible LWDBs include only:

- CareerSource Northeast Florida, LWDB 8
- CareerSource North Central Florida, LWDB 9
- CareerSource Flagler Volusia, LWDB 11
- CareerSource Central Florida, LWDB 12
- CareerSource Brevard, LWDB 13
- CareerSource Tampa Bay, LWDB 15
- CareerSource Pasco Hernando, LWDB 16
- CareerSource Polk, LWDB 17
- CareerSource Heartland, LWDB 19
- CareerSource Research Coast, LWDB 20
- CareerSource Palm Beach County, LWDB 21
- CareerSource Broward, LWDB 22
- CareerSource South Florida, LWDB 23
- CareerSource Southwest Florida, LWDB 24

Figure 3 details the eligible LWDBs and their service areas.

Figure 3: Local Workforce Development Boards Serving Most Impacted and Distressed Communities



2.9 Timeline

Training must be in progress by the next available class session following development of the system of record. All training must be completed by June 30, 2023. All reimbursement requests must be submitted by December 31, 2023.

2.10 Allocation

A total of \$20,000,000 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.

2.11 Program Management

The FloridaCommerce Office of Long-Term Resiliency is the administrator of a Community Development Block Grant - Disaster Recovery (CDBG-DR) program funded by HUD under Public Laws 115-56 and 115-123. FloridaCommerce is the agency responsible for the administration of disaster funds allocated to housing, economic development and infrastructure activities in Florida. FloridaCommerce will implement the WRTP through subrecipients including the state's LWDBs, educational institutions, and technical centers. FloridaCommerce will execute subrecipient agreements with selected subrecipients, who will deliver services and be the primary contact for participants. The program contact *for subrecipients only* is:

Attention: Economic Development and Business Recovery Manager

Division of Community Development

Florida Department of Commerce

107 East Madison Street

Caldwell Building, MSC 420

Tallahassee, FL 32399

(850) 717-8407

workforcerecovery@Commerce.fl.gov

2.12 Equal Opportunity

Federal policies ensure that no person be excluded, denied benefits, or subjected to discrimination on the basis of race, color, national origin, sex, disability, or age under any program funded in whole or in part by CDBG-DR funds. FloridaCommerce 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 Commerce

107 East Madison Street

Caldwell Building, MSC 150

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Tallahassee, FL 32399-4129

(850) 921-3205

Civil.Rights@Commerce.fl.gov

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

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

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

2.13 Conflict of Interest

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

2.14 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@Commerce.fl.gov.

All suspected cases of fraud will be taken seriously, and complaints will be reported to OLTR’s Compliance and Reporting Manager and FloridaCommerce’s Office of Inspector General at OIG@Commerce.fl.gov. If FloridaCommerce’s OIG determines that is appropriate, it will coordinate its investigation with agencies such as the Florida Office of 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) and FloridaCommerce's HUD Community Planning and Development (CPD) Representative. *OLTR must provide a timely response within 15 working days of the receipt of a complaint, as stated in 84 FR 169.*

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

2.15 Files, Records and Reports

FloridaCommerce and subrecipients will maintain accurate files and records on each participant, and FloridaCommerce will retain all pertinent documentation for the grant between HUD and FloridaCommerce. Compliance will be maintained in accordance with the reporting requirements as outlined in the FloridaCommerce policies and procedures. This includes all information and reports as required under the FloridaCommerce contract with HUD and 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.

2.16 Procurement Requirements

Federal, state, and local procurement rules apply when purchasing services, supplies, materials, or equipment. FloridaCommerce and all subrecipients must abide by the procurement process mandated by federal and state government codes as they are applicable to the WRTP. The procurement process includes the decision to purchase as well as the process to complete the purchase. The federal government has established a set of procurement rules in 2 CFR Part 200 that apply to CDBG-DR projects. 24 CFR 570.502 requires compliance with 2 CFR Part 200 for CDBG-DR projects, with certain limited exemptions (see also 24 CFR 85.36 and 24 CFR 84.40-48, as applicable). These rules are in place to ensure that federal dollars are spent fairly and encourage open competition for the best level of service and price. If a conflict between federal and local procurement regulations should occur, the more stringent regulation will be followed.

2.17 Public Records

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

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

<http://Myfloridalegal.com/webfiles.nsf/WF/RMAS-9UPM53/%24file/2015SunshineLawManual.pdf>.

Florida Public Records Law, Chapter 119, Florida Statutes:

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0100-0199/0119/0119.html.

2.18 Section 3

The Housing and Urban Development Act of 1968, Section 3, mandates that recipients of CDBG-DR funding provide, to the greatest extent possible, training, employment, contracting, and other economic

opportunities to low- and very low-income persons or business concerns that provide economic opportunities to low- and very low-income persons. Subrecipients will be required to demonstrate efforts to recruit and target residents receiving public housing assistance and other low- and very-low-income persons.

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

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

2.19 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. 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. To meet these requirements, a Certificate of Exemption form and the associated documentation for each WRTP activity location must be provided to FloridaCommerce at least 7 days in advance of the commencement of WRTP activities at said location. The Certificate of Exemption form may be accessed at: <https://www.hudexchange.info/resource/3141/part-58-environmental-review-exempt-or-censt-format/>.

If an environmental condition identified on a proposed WRTP activity site cannot be cleared, the site may not be an eligible location for activities. 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.

2.20 Program Income

This program will not create program income.

3.0 Subrecipient Applicant Requirements

FloridaCommerce will use a subrecipient model to deliver the WRTP through Florida's 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 employment services. For information on requirements for individual participants seeking services and benefits through the WRTP, see Part 3 of this document.

3.1 Eligible 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 counties and zip codes for Hurricane Irma. This includes LWDBs 8, 9, 11, 12, 13, 15, 16, 17, 20, 21, 22, 23, and 24 (see Figure 3);
- Educational institutions located within the HUD-identified MID counties and zip codes for Hurricane Irma; and
- Technical centers located within the HUD-identified MID counties and zip codes for Hurricane Irma.

3.2 Application Period

There will be a 14-day period for submission of questions following the initial publication of the RFA on the FloridaCommerce website. At the end of the question period, all answers will be posted on the FloridaCommerce website. The application submission cycle for the WRTP will open on October 28, 2019 and will be open for a period of 60 days. If applicable, any extension of the application intake period beyond 60 days will be announced and posted on the FloridaCommerce website.

3.3 Subrecipient Application Process

Eligible LWDBs, educational institutions, and technical centers will be invited to submit applications proposing programming for funding through the WRTP. Responses will be evaluated to ensure programming meets the minimum criteria for the WRTP. Responses that meet minimum requirements will then be evaluated according to the evaluation criteria in Section 2.6 below to rank responses and determine the level of funding.

3.4 Application Requirements

Applications for funding as a subrecipient through the WRTP are required to include proposed workforce training in construction trades. Construction trades may include, but are not limited to:

- Roofing;
- Masonry;
- Carpentry;
- Concrete finishing;
- Plumbing;
- HVAC (heating, ventilation, and air conditioning);
- Electricity;
- Heavy equipment operations;
- Carpet laying;

- Glass / window installation;
- Plastering; and
- Welding.

A defined time period for each construction 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 job readiness and job placement assistance to support successful graduates of training in obtaining employment.

Responses may also include proposed support services. Support services may include, but are not limited to:

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

Proposed services must be available in English, Spanish, and Haitian Creole.

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 51% of individuals served meet LMI requirements based on total household income and total household size.

Responses must include submission of a proposed budget and anticipated client services in responses. The proposed budget must include a detailed description of proposed costs by category, including training, support services, job search services, and program management and administration.

Anticipated client services must include a description of the services to be provided, including training subject areas / trades, types of support services, description of job readiness and job placement program, and activities to support Section 3 requirements.

All proposed activities in responses must be CDBG-DR eligible (see 2.8 Eligible Costs). Responses may include existing programming or propose new programming. Proposed training may include classroom training, apprenticeship programs, on-the-job training, customized training, or other proposed innovative models. Responses may include proposed subrecipient partnerships with public, private, or non-profit entities to deliver WRTP services. If an applicant intends to utilize a partnership to deliver services, the response must document how partners will be selected. Any entity that is listed as excluded, debarred, or suspended on the System for Award Management (<https://sam.gov/content/home>), 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.

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. Responses must demonstrate that services seeking funding through the WRTP will meet this requirement. Regulations do not prohibit a subrecipient from continuing to provide funding to a CDBG-DR-funded public service at the same or decreased level in subsequent program years.

To meet requirements for the Housing and Urban Development Act of 1968, Section 3 (see 1.17 Section above), services provided by applicants will be required to demonstrate efforts to recruit and target residents receiving public housing assistance and other low- and very-low-income persons. Responses must include proposed activities to meet Section 3 goals.

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.

3.5 Applicant Responsiveness

During the application process, an applicant is required to respond in a timely manner to FloridaCommerce requests for information / materials to complete the evaluation process. Any request for additional information will include a definitive due date for return of requested information. If the applicant needs an extension, a clarification, or assistance, the applicant may 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.

3.6 Award Determination

Responses will be evaluated regarding programmatic services and cost effectiveness. FloridaCommerce 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.
2. Proposals will be reviewed and scored based on Program Scoring Criteria. Each evaluator will evaluate and score responses. The maximum score is 115 points.

Threshold Compliance Criteria
Applicant is an eligible LWDB, educational institution, or technical center
Proposal includes plan to meet low- and moderate-income national objective
Proposal includes workforce training activities in construction trades
Proposal includes job readiness and job placement assistance
Proposal includes activities to meet Section 3 requirement
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

Program Scoring Criteria	
5 pts	<p>Public Service: Applicants will be awarded 5 points if proposal meets public service requirement to provide 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.</p>
10 pts	<p>Section 3 Plan: Meets Section 3 requirement to demonstrate efforts to recruit and target residents receiving public housing assistance and other low- and very-low- income persons and to demonstrate that businesses supported by or working on CDBG-DR funded projects are referred to successful graduates of this training to meet their contracted Section 3 goals. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 5 points – Includes an outreach program to target and recruit recipients of public housing assistance and other low- and very-low-income persons for program participation. • 5 points – Includes an outreach program to target and encourage businesses supported by or working on CDBG-DR funded projects to hire successful graduates of the WRTP.
15 pts	<p>Services for Individuals with Limited English Proficiency: Applicants will be awarded 5 points for each language in which services are available:</p> <ul style="list-style-type: none"> • English • Spanish • Haitian Creole
5 pts	<p>Capacity: Applicants will be awarded 5 points upon demonstration that the applicant has, within the five years immediately preceding the application, received and successfully administered federal funding from HUD, the Department of Labor, the Department of Education, or another federal agency without unresolved findings by that federal agency or the Office of Inspector General of that agency. Applicants may satisfy this requirement through submission of a certification from the Executive Director, Chief Executive Officer, or other senior employee or representative that is authorized to make such a certification on behalf of the applicant.</p>
10 pts	<p>Staffing: Leadership, staff, and resources demonstrate skill and experience necessary for implementing proposed services. Applicants will be awarded points based on the demonstrated experience in delivery of workforce training programs. The applicant will identify the staff responsible for the overall leadership and management of the proposed program. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 10 points – Over 50% of the identified program staff have 5 years or more in leadership and management of workforce training programs of the nature the applicant proposes. • 5 points – Between 25 – 50% of the identified program staff have 5 years or more in leadership and management of workforce training programs of the nature the applicant proposes. • 0 points – Less than 25% of the identified program staff have 5 years or more in leadership and management of workforce training programs of the nature the applicant proposes.

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10 pts	<p>Graduate placement: Demonstrated track record of success in providing similar services, including ratio of training entrants to graduates and graduate employment rate. Applicants will be awarded 10 points upon demonstration that the applicant has, within the five years immediately preceding the application, established a statistically significant graduate placement rate. Applicants may satisfy this requirement through submission of a certification from the Executive Director, Chief Executive Officer, or other senior employee or representative that is authorized to make such a certification on behalf of the applicant.</p>
15 pts	<p>LMI population: Ability to serve target population to meet LMI national objective. Applicants will be awarded 15 points upon submission of a plan demonstrating prioritization or other means to ensure that at least 51% of individuals served through the subrecipient's WRTP programming will meet LMI requirements based on total household income and total household size.</p>
5 pts	<p>Training timeframe: Applicants will be awarded 5 points upon demonstration that defined timeframe(s) for participant completion of training is(are) appropriate for each construction occupation and supports Hurricane Irma recovery efforts.</p>
10 pts	<p>Support services: 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 implementation of support services in the 5 years immediately preceding the application. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 5 points – List of support services to be offered to participants. • 5 points – Statistics demonstrate successful implementation of support services in the 5 years immediately preceding the application.
10 pts	<p>Job readiness: 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 and job placement services to be offered to participants and statistics demonstrating successful implementation of job readiness and job placement services in the 5 years immediately preceding the application. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 5 points – List of job readiness and job placement services to be offered to participants. • 5 points – Statistics demonstrate successful implementation of job readiness and job placement services in the 5 years immediately preceding the application.
20 pts	<p>Construction trades training: Proposed job training supports construction trades in scope of work and demonstrates support of Hurricane Irma recovery efforts. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 10 points – Job training supports the construction trades listed in the Scope of Work. • 10 points – Job training supports Hurricane Irma recovery efforts.
115 pts	Total maximum score

FloridaCommerce will score each proposal separately based on the information submitted by the applicant. Responses that earn a score of at least 70 points are determined to be eligible for funding. If available funding can fully fund all responses earning at least 70 points, then all eligible responses will be fully funded. If eligible responses exceed available funding, responses will be funded in ranked order based on evaluation score. FloridaCommerce reserves the option to fund all, a portion of, or none of each proposal submitted by an applicant.

3.7 Technical Assistance

FloridaCommerce or its designated partners will provide technical assistance to subrecipients related to WRTP requirements and compliance. Technical assistance will be provided as a result of monitoring activities and at subrecipient request.

3.8 Eligible Costs

All costs must be CDBG-DR eligible. All costs must comply with the requirements of 24 CFR 570 and 2 CFR 200. Eligible costs for the WRTP include, but are not limited to:

- Training;
- Job readiness and job placement services;
- Materials and supplies related to WRTP training activities;
- Support services;
- Participant outreach; and
- Program management and administration.

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

- Income payments, including trainee wages and trainee 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;
- 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, FloridaCommerce, or any applicable state or federal agency.

3.9 Funding Method

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

3.10 Supplanting Funds

Subrecipients must agree to 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. 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 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.

3.11 Subrecipient Responsibilities

Subrecipients have the following responsibilities and must:

- Enter into a subrecipient agreement with FloridaCommerce specific to the WRTP.
- Comply with all terms and conditions of the subrecipient agreement, WRTP guidelines, *Action Plan*, and applicable federal, state, and local laws.
- Screen all participant applications received to determine eligibility in accordance with Part 3 of these guidelines, including identity, age, work authorization, and income.
- Develop policies and procedures relating to the application intake, prioritization, and eligibility screening process, income self-certification, compliance requirements, and reporting methodology.
- Develop policies and procedures to detect and prevent fraud, waste and abuse that describe how the subrecipient will verify the accuracy of participant information and report instances of suspected fraud, waste, or abuse.
- Develop policies and procedures for complaints and grievances, and for appeals. These policies and procedures must be made available to participants and participant applicants.
- Update the participant application or program policies and procedures upon FloridaCommerce request.
- Document all complaints, grievances, and appeals received. To comply with HUD requirements, a response to each complaint, grievance, or appeal must be made within 15 working days of receipt.
- Maintain books, records, and documents relating to the WRTP in accordance with generally accepted accounting procedures and practices which sufficiently and properly reflect all expenditures of funds provided by FloridaCommerce under this program. All records must be maintained for six (6) years beyond the closeout of the grant.
- Retain sufficient records to document WRTP activities, participants, and services and to demonstrate compliance with the WRTP guidelines, subrecipient agreement, and applicable federal, state, and local laws and regulations. All records must be maintained for six (6) years beyond the closeout of the grant.
- For educational institution and technical center subrecipients, execute a Memorandum of Understanding 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/content/home>), including affiliated businesses with the same EIN.

- Include the following statement on all program materials “Warning: Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly and willingly making false or fraudulent statements to any department of the U.S. Government.”
- Comply with the requirement that subrecipients will not carry out any of the activities under their agreement with FloridaCommerce in a manner that results in a prohibited duplication of benefits as defined by Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974.
- Provide a detailed timeline for implementation consistent with the milestones outlined in these guidelines and report actual progress against the projected progress on a monthly basis.
- Provide a monthly report to FloridaCommerce that outlines the activities completed in the previous month.
 - The report must include financial metrics that demonstrate the implementation costs to date with projected spending.
 - Reports must include narrative of actions taken to comply with the requirements of Section 3 (e.g., records of notification/recruiting, participation in local events) and documentation of impediments to reaching the target 30% participant goal.
 - Reports must include documentation of the number of complaints received, the nature of the complaint, and that complaint was responded to within 15 days of receipt.
 - Reports must include information on program services and performance.
 - All reporting data and documentation must be submitted in the format, means, and frequency required by FloridaCommerce.
 - Additional reporting requirements may be required, dependent on the specific program design implemented by a subrecipient.
- Provide a monthly report to FloridaCommerce that details the grant funding approved versus funding disbursed.
- Demonstrate that each award and associated activities meets the national objective.
- Monitor compliance with the terms and conditions of the subrecipient agreement.
- Maintain organized files and make them accessible to FloridaCommerce or its representatives upon request.

3.12 Eligible Activities

Before any activity can be funded in whole or in part with CDBG-DR funds, a determination must be made as to whether the activity is eligible under Title I of the Housing and Community Development Act of 1974, as amended. The WRTP is offered under the eligible activity of public service as provided in HCDA Section 105(a)(8). This eligible activity is both a provision of a new service or is a quantifiable increase in the level of a service above that which has been provided by or on behalf of the state in the 12 months preceding adoption of the *Action Plan*.

All activities must meet one of the national objectives. This program will utilize the LMI benefit national objective using the limited clientele category.

Eligible activities are limited to workforce training, support services, job readiness, job placement, and other related services as provided by program guidelines and applicable regulations.

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. At least 51 percent of individuals served must meet LMI requirements for the program to meet the LMI objective.

CDBG regulations permit self-certification of income for public service activities as referenced in 24 CFR 570.506(b). Subrecipients must develop policies and procedures relating to participant income self-certification.

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 Required Documentation

Each subrecipient must obtain and retain the following documentation for each participant receiving services through the WRTP:

- Completed application
- Identify verification documentation
- Age verification documentation
- Work authorization documentation
- Income verification documentation
- Subrogation agreement and certification
- Proof of training registration/class schedule
- Proof of training completion
- Proof of certification earned
- Support services documentation
- Post-graduation employment information

3.15 Compliance and Monitoring of Subrecipients

As a recipient of federal funds, FloridaCommerce is charged with ensuring that any subrecipient has the capacity and means to deliver 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. Additionally, all subrecipients will be subject to routine

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monitoring and compliance review by FloridaCommerce or its representatives based on an initial risk analysis. Monitoring will include evaluation of the subrecipient's organization, procurements, policies and procedures, duplication of benefits, necessary and reasonable cost standards, financial management, file management and documentation, national objective, eligibility of funding, reporting, and compliance with these guidelines, the subrecipient agreement, and any applicable laws and regulations.

FloridaCommerce will monitor the WRTP directly and through designated partners. This includes verification of official documents against state records, review of application materials and expense documentation, and physical site visits to verify compliance and appropriate use of funds. Additional reviews may be conducted by HUD. Monitoring reviews may be announced or unannounced. Monitoring may take place on site or remotely. Reviewed documentation may be randomly selected. Participant applications and documentation must be maintained and made available by subrecipients. All monitoring results will be recorded in detail for compliance, use of funds, etc. Issues of non-compliance may be categorized as either findings or observations. Subrecipients found to be in non-compliance, or which received funds in error, may be required to repay grant funds to the State of Florida, in accordance with the subrecipient agreement.

4.0 Individual Participant Requirements

4.1 Participant Application

Individuals seeking to receive training, support services, or other benefits through the WRTP must complete an application. An individual may complete an application by:

- Going online to www.RebuildFlorida.gov;
- Visiting a subrecipient's office location;
- Contacting a subrecipient by phone.

After WRTP subrecipients are selected, contact information for all subrecipients will be posted on www.RebuildFlorida.gov.

Participant applications will be accepted and eligibility for services and benefits determined on a priority schedule to ensure compliance with the LMI national objective. Veterans and eligible veteran 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.

4.2 Participant Application Period

Each subrecipient may set the application period for the subrecipient's program services. For more information, interested individuals should contact the appropriate subrecipient.

4.3 Income

Participant income must be verified before eligibility is determined for the WRTP. 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. The WRTP will use the published HUD income limits, including updated income tables for each year as they are made available by HUD. 2020 income limits are included in Appendix A - HUD Income Limits.

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.

4.4 Work Authorization

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

4.5 Identity

All participants must provide documentation establishing proof of identity.

4.6 Age

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

4.7 Eligibility Determination Process

Applications are reviewed by the applicable subrecipient. The subrecipient makes the determination on eligibility based on these program guidelines and subrecipient policies and procedures.

4.8 Ineligible Participants

Any individual participant who applied for services through a subrecipient and cannot provide 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).

4.9 Complaints/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 1.11 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 FloridaCommerce may be filed with FloridaCommerce. Any complaint or grievance filed with an inappropriate entity will be forwarded to the proper entity for action.

Complaints or grievances may be filed with FloridaCommerce in the following ways:

Via online complaint form available on the Rebuild Florida website at <http://www.rebuildflorida.gov>.

- Via U.S. mail to:

Attention: Rebuild Florida Constituent Services
Division of Community Development
Florida Department of Commerce
107 East Madison Street
Caldwell Building, MSC 420
Tallahassee, FL 32399

- Via email to: CMS@Commerce.fl.gov

4.10 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 FloridaCommerce 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 FloridaCommerce, an appeal may be filed with FloridaCommerce as follows:

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

Office of Long-Term Resiliency, Special Deputy of Appeals
Division of Community Development
Florida Department of Commerce
107 East Madison Street
Caldwell Building, MSC 420
Tallahassee, FL 32399
 - Email to CDBG-DRAppeals@Commerce.fl.gov
- 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 FloridaCommerce 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 FloridaCommerce for more information on the appeal procedure.

4.11 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 can be shared with state and federal agencies and certain third parties in order to verify information given to the program. The participant and everyone 18 and older in the household are required to sign the release.
- Swear to the accuracy and completeness of all information provided to the program under penalty of law.
- Sign a subrogation agreement acknowledging that any overpayment of benefits will be subject to recapture.

5.0 Duplication of Benefits

5.1 Duplication of Benefits Overview

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, FloridaCommerce, and its subrecipients must take into account certain aid received by a person or entity in determining the amount of assistance which can be granted. FloridaCommerce and subrecipients must follow HUD's Duplication of Benefits (DOB) Guidance. Individual participants must provide any information on benefits received that may create a DOB to the appropriate subrecipient. The subrecipient must perform due diligence verification of DOB information.

The Supplemental Appropriations Act authorizing CDBG funding and the Stafford Act include restrictions on using CDBG-DR program funds to provide assistance when insurance providers or other federal or state entities have already funded all or a portion of the activity. The Stafford Act also contains eligibility requirements for recipients who have received prior disaster funding based upon whether 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. 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.

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 FloridaCommerce. 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 (FloridaCommerce) obtains the right to collect any additional disaster recovery payouts 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 FloridaCommerce if additional funds are received and to assist FloridaCommerce in collecting any amounts owed to them from these sources. All parties shall comply with standard anti-fraud measures. FloridaCommerce will exercise all normal due diligence in collection of amounts owed through contact with awardees and will pursue investigation and collection efforts which

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may include demand letters, small claims court, filing of judgments, and / or other collection activity. Collection activity following demand letters will be determined in consultation with FloridaCommerce and / or the Florida Attorney General's Office.

Appendix A – HUD Income Limits

CDBG Household Income Limit Categories by County & Zip Code										
FY 2021 Income Limit Area	Median Family Income	FY 2021 Income Limit Category	Persons in Household							
			1	2	3	4	5	6	7	8
			Persons in Household							
			1	2	3	4	5	6	7	8
Alachua County	\$80,800	Very Low (50%) Income Limits (\$)	25,650	29,300	32,950	36,600	39,550	42,500	45,400	48,350
		Extremely Low Income Limits (\$)*	15,400	17,600	19,800	21,950	23,750	25,500	27,250	29,000
		Low (80%) Income Limits (\$)	41,000	46,850	52,700	58,550	63,250	67,950	72,650	77,300
			Persons in Household							
			1	2	3	4	5	6	7	8
Baker County	\$73,700	Very Low (50%) Income Limits (\$)	25,800	29,500	33,200	36,850	39,800	42,750	45,700	48,650
		Extremely Low Income Limits (\$)*	15,500	17,700	19,900	22,100	23,900	25,650	27,450	29,200
		Low (80%) Income Limits (\$)	41,300	47,200	53,100	58,950	63,700	68,400	73,100	77,850
			Persons in Household							
			1	2	3	4	5	6	7	8
Bradford County	\$57,700	Very Low (50%) Income Limits (\$)	20,200	23,100	26,000	28,850	31,200	33,500	35,800	38,100
		Extremely Low Income Limits (\$)*	12,150	13,850	15,600	17,300	18,700	20,100	21,500	22,850
		Low (80%) Income Limits (\$)	32,350	36,950	41,550	46,150	49,850	53,550	57,250	60,950
			Persons in Household							
			1	2	3	4	5	6	7	8
Brevard County	\$77,900	Very Low (50%) Income Limits (\$)	25,450	29,050	32,700	36,300	39,250	42,150	45,050	47,950
		Extremely Low Income Limits (\$)*	15,300	17,450	19,650	21,800	23,550	25,300	27,050	28,800
		Low (80%) Income Limits (\$)	40,700	46,500	52,300	58,100	62,750	67,400	72,050	76,700

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Broward County	\$73,400	Very Low (50%) Income Limits (\$)	30,800	35,200	39,600	44,000	47,550	51,050	54,600	58,100
		Extremely Low Income Limits (\$)*	18,500	21,150	23,800	26,400	28,550	30,650	32,750	34,850
		Low (80%) Income Limits (\$)	49,300	56,350	63,400	70,400	76,050	81,700	87,300	92,950
		Persons in Household								
		1	2	3	4	5	6	7	8	
Charlotte County	\$66,700	Very Low (50%) Income Limits (\$)	22,700	25,950	29,200	32,400	35,000	37,600	40,200	42,800
		Extremely Low Income Limits (\$)*	13,650	15,600	17,550	19,450	21,050	22,600	24,150	25,700
		Low (80%) Income Limits (\$)	36,300	41,500	46,700	51,850	56,000	60,150	64,300	68,450
		Persons in Household								
		1	2	3	4	5	6	7	8	
Citrus County	\$53,900	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Clay County	\$74,800	Very Low (50%) Income Limits (\$)	26,200	29,950	33,700	37,400	40,400	43,400	46,400	49,400
		Extremely Low Income Limits (\$)*	15,750	18,000	20,250	22,450	24,250	26,050	27,850	29,650
		Low (80%) Income Limits (\$)	41,900	47,900	53,900	59,850	64,650	69,450	74,250	79,050
		Persons in Household								
		1	2	3	4	5	6	7	8	
Collier County	\$84,300	Very Low (50%) Income Limits (\$)	29,550	33,750	37,950	42,150	45,550	48,900	52,300	55,650
		Extremely Low Income Limits (\$)*	17,750	20,250	22,800	25,300	27,350	29,350	31,400	33,400
		Low (80%) Income Limits (\$)	47,250	54,000	60,750	67,450	72,850	78,250	83,650	89,050

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Columbia County	\$70,100	Very Low (50%) Income Limits (\$)	20,600	23,550	26,500	29,400	31,800	34,150	36,500	38,850
		Extremely Low Income Limits (\$)*	12,400	14,150	15,900	17,650	19,100	20,500	21,900	23,300
		Low (80%) Income Limits (\$)	32,900	37,600	42,300	47,000	50,800	54,550	58,300	62,050
		Persons in Household								
		1	2	3	4	5	6	7	8	
DeSoto County	\$43,200	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Dixie County	\$46,800	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Duval County	\$74,800	Very Low (50%) Income Limits (\$)	26,200	29,950	33,700	37,400	40,400	43,400	46,400	49,400
		Extremely Low Income Limits (\$)*	15,750	18,000	20,250	22,450	24,250	26,050	27,850	29,650
		Low (80%) Income Limits (\$)	41,900	47,900	53,900	59,850	64,650	69,450	74,250	79,050
		Persons in Household								
		1	2	3	4	5	6	7	8	
Flagler County	\$71,200	Very Low (50%) Income Limits (\$)	24,100	27,550	31,000	34,400	37,200	39,950	42,700	45,450
		Extremely Low Income Limits (\$)*	14,500	16,550	18,600	20,650	22,350	24,000	25,650	27,300
		Low (80%) Income Limits (\$)	38,550	44,050	49,550	55,050	59,500	63,900	68,300	72,700

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Gilchrist County	\$80,800	Very Low (50%) Income Limits (\$)	25,650	29,300	32,950	36,600	39,550	42,500	45,400	48,350
		Extremely Low Income Limits (\$)*	15,400	17,600	19,800	21,950	23,750	25,500	27,250	29,000
		Low (80%) Income Limits (\$)	41,000	46,850	52,700	58,550	63,250	67,950	72,650	77,300
		Persons in Household								
		1	2	3	4	5	6	7	8	
Glades County	\$50,700	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Hardee County	\$50,000	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Hendry County	\$47,100	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Hernando County	\$72,700	Very Low (50%) Income Limits (\$)	25,850	29,550	33,250	36,900	39,900	42,850	45,800	48,750
		Extremely Low Income Limits (\$)*	15,550	17,750	19,950	22,150	23,950	25,700	27,500	29,250
		Low (80%) Income Limits (\$)	41,350	47,250	53,150	59,050	63,800	68,500	73,250	77,950

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Highlands County	\$51,000	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Hillsborough County	\$72,700	Very Low (50%) Income Limits (\$)	25,850	29,550	33,250	36,900	39,900	42,850	45,800	48,750
		Extremely Low Income Limits (\$)*	15,550	17,750	19,950	22,150	23,950	25,700	27,500	29,250
		Low (80%) Income Limits (\$)	41,350	47,250	53,150	59,050	63,800	68,500	73,250	77,950
		Persons in Household								
		1	2	3	4	5	6	7	8	
Indian River County	\$77,600	Very Low (50%) Income Limits (\$)	25,550	29,200	32,850	36,500	39,450	42,350	45,300	48,200
		Extremely Low Income Limits (\$)*	15,350	17,550	19,750	21,900	23,700	25,450	27,200	28,950
		Low (80%) Income Limits (\$)	40,900	46,750	52,600	58,400	63,100	67,750	72,450	77,100
		Persons in Household								
		1	2	3	4	5	6	7	8	
Lafayette County	\$57,100	Very Low (50%) Income Limits (\$)	20,000	22,850	25,700	28,550	30,850	33,150	35,450	37,700
		Extremely Low Income Limits (\$)*	12,050	13,750	15,450	17,150	18,550	19,900	21,300	22,650
		Low (80%) Income Limits (\$)	32,000	36,600	41,150	45,700	49,400	53,050	56,700	60,350
		Persons in Household								
		1	2	3	4	5	6	7	8	
Lake County	\$70,800	Very Low (50%) Income Limits (\$)	26,750	30,550	34,350	38,150	41,250	44,300	47,350	50,400
		Extremely Low Income Limits (\$)*	16,050	18,350	20,650	22,900	24,750	26,600	28,400	30,250
		Low (80%) Income Limits (\$)	42,750	48,850	54,950	61,050	65,950	70,850	75,750	80,600

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Lee County	\$71,900	Very Low (50%) Income Limits (\$)	25,200	28,800	32,400	35,950	38,850	41,750	44,600	47,500
		Extremely Low Income Limits (\$)*	15,100	17,250	19,400	21,550	23,300	25,000	26,750	28,450
		Low (80%) Income Limits (\$)	40,250	46,000	51,750	57,500	62,100	66,700	71,300	75,900
		Persons in Household								
		1	2	3	4	5	6	7	8	
Levy County	\$50,500	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Manatee County	\$77,200	Very Low (50%) Income Limits (\$)	27,050	30,900	34,750	38,600	41,700	44,800	47,900	51,000
		Extremely Low Income Limits (\$)*	16,250	18,550	20,850	23,150	25,050	26,900	28,750	30,600
		Low (80%) Income Limits (\$)	43,250	49,400	55,600	61,750	66,700	71,650	76,600	81,550
		Persons in Household								
		1	2	3	4	5	6	7	8	
Marion County	\$55,600	Very Low (50%) Income Limits (\$)	19,500	22,250	25,050	27,800	30,050	32,250	34,500	36,700
		Extremely Low Income Limits (\$)*	11,700	13,400	15,050	16,700	18,050	19,400	20,750	22,050
		Low (80%) Income Limits (\$)	31,150	35,600	40,050	44,500	48,100	51,650	55,200	58,750
		Persons in Household								
		1	2	3	4	5	6	7	8	
Martin County	\$71,500	Very Low (50%) Income Limits (\$)	25,050	28,600	32,200	35,750	38,650	41,500	44,350	47,200
		Extremely Low Income Limits (\$)*	15,050	17,200	19,350	21,450	23,200	24,900	26,600	28,350
		Low (80%) Income Limits (\$)	40,050	45,800	51,500	57,200	61,800	66,400	70,950	75,550

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Miami-Dade County	\$61,000	Very Low (50%) Income Limits (\$)	31,650	36,200	40,700	45,200	48,850	52,450	56,050	59,700
		Extremely Low Income Limits (\$)*	19,000	21,700	24,400	27,100	29,300	31,450	33,650	35,800
		Low (80%) Income Limits (\$)	50,650	57,850	65,100	72,300	78,100	83,900	89,700	95,450
		Persons in Household								
		1	2	3	4	5	6	7	8	
Monroe County	\$84,400	Very Low (50%) Income Limits (\$)	35,600	40,700	45,800	50,850	54,950	59,000	63,100	67,150
		Extremely Low Income Limits (\$)*	21,350	24,400	27,450	30,500	32,950	35,400	37,850	40,300
		Low (80%) Income Limits (\$)	56,950	65,100	73,250	81,350	87,900	94,400	100,900	107,400
		Persons in Household								
		1	2	3	4	5	6	7	8	
Nassau County	\$74,800	Very Low (50%) Income Limits (\$)	26,200	29,950	33,700	37,400	40,400	43,400	46,400	49,400
		Extremely Low Income Limits (\$)*	15,750	18,000	20,250	22,450	24,250	26,050	27,850	29,650
		Low (80%) Income Limits (\$)	41,900	47,900	53,900	59,850	64,650	69,450	74,250	79,050
		Persons in Household								
		1	2	3	4	5	6	7	8	
Okeechobee County	\$48,800	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Orange County	\$70,800	Very Low (50%) Income Limits (\$)	26,750	30,550	34,350	38,150	41,250	44,300	47,350	50,400
		Extremely Low Income Limits (\$)*	16,050	18,350	20,650	22,900	24,750	26,600	28,400	30,250
		Low (80%) Income Limits (\$)	42,750	48,850	54,950	61,050	65,950	70,850	75,750	80,600

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Osceola County	\$70,800	Very Low (50%) Income Limits (\$)	26,750	30,550	34,350	38,150	41,250	44,300	47,350	50,400
		Extremely Low Income Limits (\$)*	16,050	18,350	20,650	22,900	24,750	26,600	28,400	30,250
		Low (80%) Income Limits (\$)	42,750	48,850	54,950	61,050	65,950	70,850	75,750	80,600
		Persons in Household								
		1	2	3	4	5	6	7	8	
Palm Beach County	\$80,200	Very Low (50%) Income Limits (\$)	30,000	34,250	38,550	42,800	46,250	49,650	53,100	56,500
		Extremely Low Income Limits (\$)*	18,000	20,600	23,150	25,700	27,800	29,850	31,900	33,950
		Low (80%) Income Limits (\$)	47,950	54,800	61,650	68,500	74,000	79,500	84,950	90,450
		Persons in Household								
		1	2	3	4	5	6	7	8	
Pasco County	\$72,700	Very Low (50%) Income Limits (\$)	25,850	29,550	33,250	36,900	39,900	42,850	45,800	48,750
		Extremely Low Income Limits (\$)*	15,550	17,750	19,950	22,150	23,950	25,700	27,500	29,250
		Low (80%) Income Limits (\$)	41,350	47,250	53,150	59,050	63,800	68,500	73,250	77,950
		Persons in Household								
		1	2	3	4	5	6	7	8	
Pinellas County	\$72,700	Very Low (50%) Income Limits (\$)	25,850	29,550	33,250	36,900	39,900	42,850	45,800	48,750
		Extremely Low Income Limits (\$)*	15,550	17,750	19,950	22,150	23,950	25,700	27,500	29,250
		Low (80%) Income Limits (\$)	41,350	47,250	53,150	59,050	63,800	68,500	73,250	77,950
		Persons in Household								
		1	2	3	4	5	6	7	8	
Polk County	\$62,100	Very Low (50%) Income Limits (\$)	21,600	24,700	27,800	30,850	33,350	35,800	38,300	40,750
		Extremely Low Income Limits (\$)*	12,950	14,800	16,650	18,500	20,000	21,500	22,950	24,450
		Low (80%) Income Limits (\$)	34,550	39,500	44,450	49,350	53,300	57,250	61,200	65,150

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		Persons in Household								
		1	2	3	4	5	6	7	8	
Putnam County	\$55,700	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Sarasota County	\$77,200	Very Low (50%) Income Limits (\$)	27,050	30,900	34,750	38,600	41,700	44,800	47,900	51,000
		Extremely Low Income Limits (\$)*	16,250	18,550	20,850	23,150	25,050	26,900	28,750	30,600
		Low (80%) Income Limits (\$)	43,250	49,400	55,600	61,750	66,700	71,650	76,600	81,550
		Persons in Household								
		1	2	3	4	5	6	7	8	
Seminole County	\$70,800	Very Low (50%) Income Limits (\$)	26,750	30,550	34,350	38,150	41,250	44,300	47,350	50,400
		Extremely Low Income Limits (\$)*	16,050	18,350	20,650	22,900	24,750	26,600	28,400	30,250
		Low (80%) Income Limits (\$)	42,750	48,850	54,950	61,050	65,950	70,850	75,750	80,600
		Persons in Household								
		1	2	3	4	5	6	7	8	
St. Johns County	\$74,800	Very Low (50%) Income Limits (\$)	26,200	29,950	33,700	37,400	40,400	43,400	46,400	49,400
		Extremely Low Income Limits (\$)*	15,750	18,000	20,250	22,450	24,250	26,050	27,850	29,650
		Low (80%) Income Limits (\$)	41,900	47,900	53,900	59,850	64,650	69,450	74,250	79,050
		Persons in Household								
		1	2	3	4	5	6	7	8	
St. Lucie County	\$71,500	Very Low (50%) Income Limits (\$)	25,050	28,600	32,200	35,750	38,650	41,500	44,350	47,200
		Extremely Low Income Limits (\$)*	15,050	17,200	19,350	21,450	23,200	24,900	26,600	28,350
		Low (80%) Income Limits (\$)	40,050	45,800	51,500	57,200	61,800	66,400	70,950	75,550

Workforce Recovery Training Program Guidelines

		Persons in Household								
		1	2	3	4	5	6	7	8	
Sumter County	\$67,300	Very Low (50%) Income Limits (\$)	23,600	26,950	30,300	33,650	36,350	39,050	41,750	44,450
		Extremely Low Income Limits (\$)*	14,150	16,200	18,200	20,200	21,850	23,450	25,050	26,700
		Low (80%) Income Limits (\$)	37,700	43,100	48,500	53,850	58,200	62,500	66,800	71,100
		Persons in Household								
		1	2	3	4	5	6	7	8	
Suwannee County	\$51,800	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Union County	\$53,600	Very Low (50%) Income Limits (\$)	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
		Extremely Low Income Limits (\$)*	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
		Low (80%) Income Limits (\$)	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
		Persons in Household								
		1	2	3	4	5	6	7	8	
Volusia County	\$65,400	Very Low (50%) Income Limits (\$)	22,900	26,200	29,450	32,700	35,350	37,950	40,550	43,200
		Extremely Low Income Limits (\$)*	13,750	15,700	17,650	19,600	21,200	22,750	24,350	25,900
		Low (80%) Income Limits (\$)	36,650	41,850	47,100	52,300	56,500	60,700	64,900	69,050

Appendix B – Hurricane Irma Most Impacted and Distressed Areas

