



Rebuild Florida Hurricane Sally Workforce Recovery Training Program

Program Guidelines

This document provides the guidelines for implementation of the Rebuild Florida Hurricane Sally Workforce Recovery Training Program (WRTP) for Hurricane Sally administered by the 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 described in the *Supplemental Appropriations for Disaster Relief Act, 2022* (Public Law 117-43).

VERSION 1.1

March 19, 2024

VERSION HISTORY

Version Number	Change Date	Summary of Changes
1.0	02/8/2023	Original
1.1	3/19/2024	<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> <p>Updated Table 1: Hurricane Sally Workforce Recovery Training Program Overview to reflect the total program allocation (\$2,499,541.64), minimum award, and maximum award amounts as of Non-Substantial Amendment 1 to the Hurricane Sally Action Plan.</p> <p>Updated mentions of the minimum and maximum award amounts throughout the document.</p>

VERSION POLICY

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

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

POLICY CHANGE CONTROL

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

TABLE OF CONTENTS

1.0 Definitions and Acronyms	1
2.0 Program Overview	5
2.1 Introduction	5
2.2 Program Overview.....	6
2.3 Allocation and Award.....	6
2.4 National Objective	7
2.5 Program Activities	7
2.6 HUD Income Limits.....	7
2.7 Eligible Areas	7
2.8 Priority Schedule	8
2.9 Timeline.....	8
3.0 General Requirements.....	9
3.1 Equal Opportunity.....	9
3.2 Conflict of Interest	9
3.3 Anti-Fraud, Waste, and Abuse.....	10
3.4 Files, Records, and Reports	10
3.5 Procurement Requirements.....	10
3.6 Public Records	11
3.7 Environmental Review.....	11
3.8 Program Income.....	11
4.0 Subrecipient Requirements.....	12
4.1 Eligible Subrecipient Applicants.....	12
4.2 MID Geographic Distribution.....	12
4.3 Subrecipient Application Period	12
4.4 Subrecipient Application Process	13
4.5 Subrecipient Application Requirements	13
4.6 Subrecipient Applicant Responsiveness	14
4.7 Award Determination	14
4.8 Ineligible Entities	17
4.9 Eligible Costs.....	17
4.10 Funding Method	18
4.11 Supplanting Funds.....	18
4.12 Subrecipient Responsibilities.....	18
4.13 Income Verification.....	19

Hurricane Sally Workforce Recovery Training Program Guidelines

4.14 Duplication of Benefits Verification 20

4.15 Compliance and Monitoring of Subrecipients..... 20

5.0 Individual Participant Requirements..... 21

5.1 Participant Application 21

5.2 Participant Priority 21

5.3 Participant Application Period..... 21

5.4 Income 21

5.5 Additional Participant Qualifications/Requirements..... 22

5.6 Eligibility Determination Process..... 22

5.7 Ineligible Participants..... 22

5.8 Complaints or Grievances 22

5.9 Appeals 23

5.10 Certification Requirements to Receive Assistance..... 23

6.0 Duplication of Benefits 25

6.1 Duplication of Benefits..... 25

6.2 Subrogation..... 25

Appendix A: HUD Income Limits..... 27

1.0 Definitions and Acronyms

Action Plan – Community Development Block Grant-Disaster Recovery Action Plan for Disaster Recovery provides the high-level strategy to carry out strategic and high-impact activities to minimize or eliminate risks and reduce losses from future disasters. The Action Plan also describes the opportunity to improve state and local planning protocols and procedures.

Allocable Costs – Costs assigned to a Community Development Block Grant-Disaster Recovery eligible activity with a methodology for clear determination of where to attribute costs.

Allowable Costs – Costs deemed allowable under the Community Development Block Grant-Disaster Recovery rules and regulations and 2 CFR 200 Subpart E.

Americans with Disabilities Act (ADA) – Effective July 20, 1990, a federal law which prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services.

Applicant – Any entity that submits a response to the request for applications for potential funding through the Community Development Block Grant-Disaster Recovery Program.

Appraisal – A written statement independently and impartially prepared by a qualified appraiser setting forth an opinion of defined value of an adequately described property as of a specific date, supported by the presentation and analysis of relevant market information.

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

CFR – Code of Federal Regulations.

CMS – Constituent Management Services.

Community Development Block Grant (CDBG) – Supports community development activities to build stronger and more resilient communities. To support community development, activities are identified through an ongoing process. Activities may address needs such as infrastructure, economic development projects, public facilities installation, community centers, housing rehabilitation, public services, clearance/acquisition, microenterprise assistance, code enforcement, homeowner assistance, etc.

Community Development Block Grant-Disaster Recovery (CDBG-DR) – The Community Development Block Grant Disaster Recovery Program, administered by the U.S. Department of Housing and Urban Development, as authorized under Title I of the Housing and Community Development Act of 1974, as amended. These funds are provided as a last resort to help cities, counties, and states to recover from Presidentially declared disasters.

Consolidated Notice – The U.S. Department of Housing and Urban Development's Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 87, No. 23. The Consolidated Notice governs all Office of Long-Term Resiliency Community Development Block Grant-Disaster Recovery grants beginning with 2020 disasters (Hurricane Sally) and includes amended requirements from previous Federal Register Notices and Community Planning and Development Notices that have regulated Community Development Block Grant-Disaster Recovery funds in the past. The Consolidated Notice includes waivers and alternative requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities.

Contractor – An entity competitively selected to provide clearly-specified goods or services meeting the procurement requirements at 2 CFR Part 200, Section 287.055, Florida Statutes, and Section 255.0525, Florida Statutes.

Hurricane Sally Workforce Recovery Training Program Guidelines

Cost Reimbursement – Payment made to the subgrantee and/or subrecipient after a request for funds has been submitted along with proper supporting documentation and has been approved by the Department of Commerce. In Community Development Block Grant-Disaster Recovery grant agreements, the subgrantees and/or subrecipients are required to pay in advance for all completed work that is associated with the deliverables set forth in the subrecipient agreement and is reimbursed based on the invoice and supporting documentation submitted to the Department of Commerce.

CPD – Community Planning and Development.

Disability – Federal nondiscrimination laws define a person with a disability to include any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with a record of such impairment; or (3) individual who is regarded as having such an impairment 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 the U.S. Department of Housing and Urban Development regulations at 24 CFR 5.403 and 891.505.

Duplication of Benefits (DOB) – When a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose within the same time period, and the total assistance received for that purpose is more than the total need for assistance.

Federal Register (FR) – The official journal of the Federal Government of the United States that contains government agency rules, proposed rules, and public notices issued by federal administrative agencies.

FEMA – Federal Emergency Management Agency.

Finding(s) – A specific issue of noncompliance with federal or state regulatory requirements, including the Community Development Block Grant subrecipient/subgrant agreement provisions, that is identified in a monitoring report produced by the Department of Commerce or in an environmental review memo sent to the subrecipient/subgrantee.

Florida Department of Commerce (FloridaCommerce) – Administrator of the Community Development Block Grant-Disaster Recovery and Community Development Block Grant-Mitigation programs funded by the U.S. Department of Housing and Urban Development. FloridaCommerce is the governor-designated state authority responsible for administering all long-term disaster recovery funds awarded to Florida from the U.S. Department of Housing and Urban Development. As used in this document, “FloridaCommerce” refers to the Florida Department of Commerce.

HCDA – Housing and Community Development Act of 1974, as amended.

HUD – The United States Department of Housing and Urban Development.

LAP – Language Access and Accessibility Plan.

Low Moderate Housing (LMH) – Eligible activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households. To be eligible, structures with one unit must be occupied by a Low-to-Moderate Income Household, with two units, at least one unit must be Low-to-Moderate Income occupied, and structures with three or more units must have at least 51 percent occupied by Low-to-Moderate Income Households.

Low-to-Moderate Income (LMI) Household – A household whose annual income does not exceed 80 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

- LMI 30 refers to those individuals/families making less than 30 percent of the Area Median Income.
- LMI 50 refers to those individuals/families making less than 50 percent of the Area Median Income.
- LMI 80 refers to those individuals/families making less than 80 percent of the Area Median Income.

Hurricane Sally Workforce Recovery Training Program Guidelines

- Above LMI 80 refers to those individuals/families making more than 80 percent of the Area Median Income.

Low-to-Moderate-Income (LMI) National Objective – Activities that benefit households whose total annual gross income does not exceed 80 percent of Area Median Income, adjusted for family size. Pursuant to federal statute, the grantee is required to expend 70 percent of Community Development Block Grant-Disaster Recovery funds to meet the Low-to-Moderate-Income National Objective.

Low-to-Moderate Income (LMI) Resident/Person/Individual – A person whose annual income does not exceed 80 percent of the median income for the area as most recently determined by the U.S. Department of Housing and Urban Development.

Low Moderate Limited Clientele (LMC) – An eligible activity in which 51 percent of the actual beneficiaries are Low-to-Moderate Income Persons.

LWDB – Local Workforce Development Boards.

Most Impacted and Distressed (MID) Areas – Areas of most impact as determined by the U.S. Department of Housing and Urban Development or the state using the best available data sources to calculate the amount of disaster damage.

MOU – Memorandum of Understanding.

NEPA – National Environmental Policy Act of 1969.

Office of Long-Term Resiliency (OLTR) – The Florida Department of Commerce’s office dedicated to the administration of Community Development Block Grant-Disaster Recovery and Community Development Block Grant-Mitigation funded programs and activities.

OIG – Office of the Inspector General.

Program Income – Gross income received by the subgrantee and/or subrecipient directly generated from the use of Community Development Block Grant-Disaster Recovery funds. Revenue that is received by a state, Unit of General Local Government, or subrecipient as defined at 24 CFR 570.500.

Project/Program/Activity – The housing, infrastructure, economic development, or planning endeavor undertaken by FloridaCommerce, the subgrantee and/or subrecipient using Community Development Block Grant-Disaster Recovery funds.

Reasonable Costs – Costs that do not exceed what a prudent person would incur under similar circumstances, as demonstrated by the market price for comparable goods and services. For contracted work, the Responsible Entity should conduct an independent cost estimate to establish cost reasonableness as outlined in 2 CFR Part 200.

Rebuild Florida – A disaster recovery program created by the Florida Department of Commerce to help Florida’s long-term recovery efforts from disasters that have impacted the citizens of Florida.

Request for Applications (RFA) – The Department of Commerce notice requesting applications for funding as a subrecipient for the Community Development Block Grant-Disaster Recovery program.

Response – Any application received for CDBG-DR funding.

Responsible Entity (RE) – The entity responsible for certain components of the Community Development Block Grant-Disaster Recovery administration process including environmental reviews, monitoring, and administration. The Responsible Entity can be the Department of Commerce or a Unit of General Local Government, also known as a subrecipient, as specified by FloridaCommerce.

SAM – System for Award Management.

SBA – The United States Small Business Administration, a federal agency.

Service Area – The total geographic area to be directly or indirectly served by a subgrant project that addresses the Low-to-Moderate Income National Objective, in which at least 51 percent of the residents

Hurricane Sally Workforce Recovery Training Program Guidelines

are low-to-moderate income persons. A service area must include all, and only those, beneficiaries who are reasonably served or would be reasonably served by the activity.

Special Flood Hazard Area (SFHA) – Areas where the National Flood Insurance Program’s (NFIP’s) floodplain management regulations must be enforced and the mandatory purchase of flood insurance applies.

Subcontract – A contract entered into by a subcontractor to furnish supplies or services for performance of a prime contract, or another subcontract. It includes, but is not limited to, purchase orders, and changes and modifications to purchase orders.

Subcontractor – Any supplier, distributor, vendor, or firm that furnishes supplies or services to or for a subrecipient. As related to Section 3 of the of the Housing and Urban Development Act of 1968, as amended, any entity (other than a person who is an employee of the contractor) which has a contract with a contractor to undertake a portion of the contractor’s obligation for the performance of work generated by the expenditure of Section 3 covered assistance or arising in connection with a Section 3 covered project.

Subrecipient – A competitively-selected recipient, usually a local government, that is provided Community Development Block Grant-Disaster Recovery funds from the Department of Commerce to agreed-upon eligible disaster recovery activities documented in a Subrecipient Agreement.

Subrecipient Agreement – An agreement between the Department of Commerce and the subrecipient for the subrecipient to undertake activities using Community Development Block Grant-Disaster Recovery funds.

Subrogation – A legal doctrine that allows one entity to take on the rights of another. In the context of Disaster Recovery grants, a subrecipient must enter into a subrogation agreement in which the funding agency (the Department of Commerce) obtains the right to collect any additional disaster recovery payments the entity obtains for the same purpose after the entity has received disaster recovery benefits.

Vendor – An entity competitively selected to provide clearly-specified goods or services meeting the procurement requirements at 24 CFR 85.36, 2 CFR Part 200, Section 287.055, Florida Statutes, and Rule 73-23.0051(3), Florida Administrative Code. In accordance with 24 CFR 85.36(c), such procurement actions must be conducted in a manner that provides for free and open competition.

Very Low-Income (VU) Household/Family – A household whose annual income does not exceed 30 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

Very Low-Income (VU) Person or Individual – A person whose annual income does not exceed 30 percent of the median income for the area as most recently determined by the Department of Housing and Urban Development.

Waiver – A revision to the standard Community Development Block Grant-Disaster Recovery regulations, requirements, and activities, granted by the U.S. Department of Housing and Urban Development.

WRTP – Workforce Recovery Training Program.

2.0 Program Overview

2.1 Introduction

Hurricane Sally made landfall in Gulf Shores, Alabama at 5AM CDT on Wednesday, September 16, 2020, as a strong Category 2 hurricane with winds at 105 miles per hour and a minimum pressure of 965 millibars. Notably, Hurricane Sally impacted an area that has historically been impacted by many storms. Hurricane Sally made landfall exactly 16 years after Hurricane Ivan (2004) hit nearly the same location. Several Florida counties that were previously impacted by the catastrophic Category 5 Hurricane Michael in 2018, including Bay, Gulf, and Franklin, were subsequently impacted by Hurricane Sally less than two years later.

Following a major disaster, Congress can appropriate funds through the Community Development Block Grant-Disaster Recovery (CDBG-DR) program to satisfy a portion of unmet need that remains after other federal assistance such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), or private insurance have been allocated. Based on its assessment of disaster impact, the U.S. Department of Housing and Urban Development (HUD) announced that the State of Florida would receive an allocation of \$187,383,000 in CDBG-DR funds to assist in long-term recovery from Hurricane Sally. The Florida Department of Commerce's (the "Department's") Office of Long-Term Resiliency (OLTR) is the lead agency and responsible entity for administering the CDBG-DR funds allocated to the State of Florida. The availability of the funding was formally announced by publication in the Federal Register, Volume 87, Number 23 on February 3, 2022 (available at <https://www.govinfo.gov/content/pkg/FR-2022-02-03/pdf/2022-02209.pdf>). Federal Register requirements clearly state that funds may be used only for disaster relief and long-term recovery in communities affected by the specified disaster. Requirements provide that funds be directed to areas with the greatest need.

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

Utilizing data from the unmet needs assessment and research on disaster recovery workforce training programs in other states, FloridaCommerce developed the Rebuild Florida Workforce Recovery Training Program (WRTP) to address the unmet need for skilled trades and specialized training. This program is a CDBG-DR program funded by HUD under Public Law 117-43. FloridaCommerce is the governor-designated state authority responsible for administering all long-term disaster recovery funds awarded to Florida from HUD.

2.2 Program Overview

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

Table 1: Hurricane Sally Workforce Recovery Training Program Overview

Workforce Recovery Training Program Overview	
ALLOCATION FOR ACTIVITY	\$2,499,541.64
MAXIMUM AWARD	\$2,499,541.64
MINIMUM AWARD	\$1,000,000
ELIGIBILITY	The WRTP is a public service activity eligible under the Housing and Community Development Act, Section 105(a)(8).
APPLICABLE APPROPRIATION LAW	Public Law 117-43
APPLICABLE FEDERAL REGISTER NOTICE(S)	87 Fed. Reg. 23 (Thursday, February 3, 2022)
APPLICABLE PRESIDENTIAL DISASTER DECLARATION	FEMA 4564-DR

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

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

2.3 Allocation and Award

A total of \$5,000,000 was initially allocated to the WRTP. This allocation may be increased or decreased based on the demand for the program by amendment to the Action Plan, subject to approval by HUD.

There is a maximum award of \$2,499,541.64. There is a minimum award of \$1,000,000. No entity may receive an award that does not comply with the maximum and minimum award thresholds.

2.4 National Objective

The national objective for the WRTP is benefit to LMI persons. The WRTP will meet requirements for the LMI national objective utilizing the LMI limited clientele category. Services provided under this category serve a specific clientele, rather than providing services to all persons in a geographic area. The program will meet the LMI limited clientele category by serving LMI individuals as determined by household size and income. At least 51 percent of individuals served must meet LMI requirements based on total household income and total household size for the program to meet the LMI national objective.

Definitions provided in Section 102(a)(2) of the Housing and Community Development Act of 1974 (HCDA) define the term “low- to moderate-income persons” as households and individuals whose incomes are no more than 80 percent of the median income of the area involved. See Appendix A: HUD Income Limits for a table of 2022 HUD income limits for the Hurricane Sally impacted areas.

2.5 Program Activities

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

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

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

2.6 HUD Income Limits

HUD publishes income limits annually. To determine LMI thresholds, the WRTP will use the published HUD income limits for each year as they are made available by HUD. 2022 income limits for the Hurricane Sally impacted areas are included in Appendix A: HUD Income Limits. The income limits in effect at the time of an individual’s application for assistance will determine LMI status.

2.7 Eligible Areas

HUD requirements outlined in Federal Register Vol. 83, No. 27 (the “Consolidated Notice”) provide that at least 80 percent of funds must be spent in HUD-identified MID areas, including Escambia and Santa Rosa Counties. The remaining funds, up to 20 percent, may be spent in state-identified MID areas that received both an individual assistance and public assistance declaration, which includes Bay, Okaloosa, and Walton Counties.

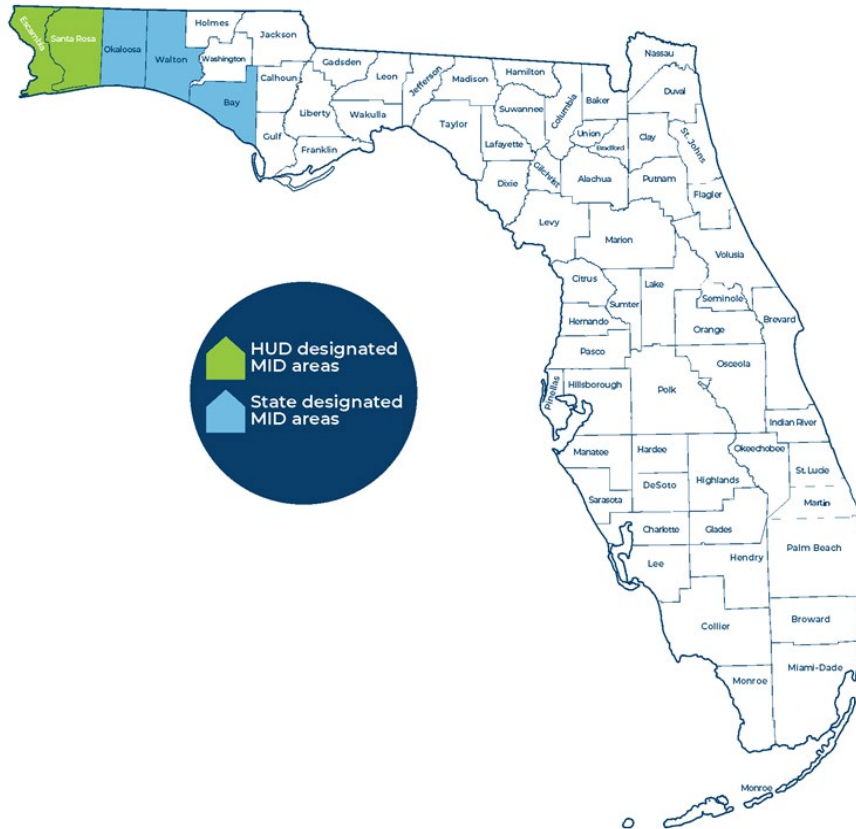


Figure 1: Hurricane Sally Most Impacted and Distressed Areas

To meet this requirement, only educational institutions and technical centers with physical locations in the HUD-identified MID areas, and LWDBs whose service area includes the HUD-identified MID areas will be eligible to apply for funding as subrecipients through the WRTP.

2.8 Priority Schedule

Individuals are not guaranteed assistance, but will be served based on availability of funds, qualification for benefits, and priority, as applicable. Participant applications to receive training 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 spouses and dependents will receive priority in accordance with federal regulations.

2.9 Timeline

Subrecipients must begin training by the next available class session following the public launch of the WRTP application period and Department determination of the subrecipient’s readiness to proceed with processing applications. FloridaCommerce’s determination on readiness to proceed with processing applications involves completion of items including, but not limited to: execution of a subrecipient agreement, submission and approval of applicable subrecipient implementation documentation, and completion of environmental review requirements for relevant project locations.

All training activities must be completed by January 1, 2027.

3.0 General Requirements

3.1 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 (including gender identity and sexual orientation), 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 (including gender identity and sexual orientation), 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 420
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>.

3.2 Conflict of Interest

State officials and employees, Department 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 HCDA 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.

3.3 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, and Abuse online form <https://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 the Inspector General (OIG) at OIG@Commerce.fl.gov. If FloridaCommerce’s OIG determines that it is appropriate, it will coordinate its investigation with agencies such as the Florida Office of the Inspector General, the Florida Office of the Attorney General, or the Florida Department of Business and Professional Regulation.

All substantiated cases of fraud, waste, or abuse of government funds will be forwarded to HUD, 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 the Consolidated Notice.*

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

3.4 Files, Records, and Reports

Subrecipients must 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 OLTR policies and procedures. This includes all information and reports as required under the subrecipient agreement, FloridaCommerce contract with HUD, and required demographic data and other information on participants, participant households, and awardees.

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

3.5 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, state, and local government laws and codes as they are applicable to the WRTP. The procurement process includes the decision to purchase as well as the process to complete the purchase. These rules are in place to ensure that federal dollars are spent fairly and encourage open competition for the best level of service and price. If a conflict between federal, state, and local procurement regulations should occur, the more stringent regulation will be followed.

3.6 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.

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

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

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

3.8 Program Income

This program will not create program income.

4.0 Subrecipient Requirements

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

This program is not a direct grant program. No funds will be paid directly to individuals seeking training and career services.

For information on requirements for individuals seeking services and benefits through the WRTP, see 5.0 Individual Participant Requirements.

4.1 Eligible Subrecipient Applicants

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

- LWDBs whose service area includes a portion of the HUD-identified MID areas for Hurricane Sally. This includes LWDBs 1, 2, and 4;
- Educational institutions with physical locations within the HUD-identified MID areas for Hurricane Sally; and
- Technical centers with physical locations within the HUD-identified MID areas for Hurricane Sally.

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

FloridaCommerce encourages all prospective subrecipient applicants to read the Action Plan for Hurricane Sally recovery located on the OLTR webpage for Hurricane Sally at www.FloridaJobs.org/CDBG-DR/Hurricane-Sally.

4.2 MID Geographic Distribution

To support compliance with the MID geographic distribution detailed in 2.7 Eligible Areas, entities applying to be subrecipients will be requested to provide a breakdown of the services and associated funding requested to be utilized in HUD-identified MID areas and state-identified MID areas. This breakdown should include funds based on the location where the funds will be expended (e.g. where the training or activities will occur), and not the location where the participant resides. Proposals for funding may only serve the eligible counties detailed in 2.7 Eligible Areas.

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

4.3 Subrecipient Application Period

The application submission cycle for WRTP subrecipient funding will officially open on February 14, 2023, and close on April 30, 2023. If applicable, any extension of the application submission period will be announced and posted on the Hurricane Sally Rebuild Florida WRTP webpage found at <https://floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/disaster-recovery-initiative/hurricane-sally/rebuild-florida-hurricane-sally-workforce-recovery-training-program>.

4.4 Subrecipient Application Process

Eligible LWDBs, educational institutions, and technical centers will be invited to submit applications proposing programming for funding through the WRTP. Applications may be submitted at any time during the application period. FloridaCommerce will take questions about the WRTP throughout the application process.

FloridaCommerce hosted a live webinar on February 2, 2023, to provide an overview of the Hurricane Sally programs, the application process, and answer questions.

Following the closure of the application period, responses will be evaluated to ensure programming meets the minimum threshold criteria for the WRTP. Responses that meet minimum threshold requirements will then be evaluated according to the evaluation criteria in 4.7 Award Determination to rank responses and determine awarded entities and the level of funding.

4.5 Subrecipient Application Requirements

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

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

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

- Peer support programs,
- Counseling,
- ESOL,
- Transportation assistance,
- Childcare assistance, and
- Computer skills/digital literacy.

HUD regulations require that public service programs, including the WRTP, must provide either a new service or a quantifiable increase in the level of an existing service listed above that was provided through state or local funds in the year prior to the submission of the Action Plan (submitted August 5, 2022). Responses must demonstrate that services seeking funding through the WRTP will meet this requirement.

Subrecipient's 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 percent of individuals served meet LMI requirements based on total household income and total household size. Responses should also include statistics demonstrating successful delivery of workforce training services to low-income individuals in the five years immediately preceding the application.

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

Hurricane Sally Workforce Recovery Training Program Guidelines

To comply with FloridaCommerce's Language Access Plan (LAP) requirements for Hurricane Sally impacted areas, responses must include provisions for providing proposed services in English and Spanish.

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

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

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

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

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

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

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

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

4.6 Subrecipient Applicant Responsiveness

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

4.7 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, as seen in Table 2: Threshold Compliance Criteria. All proposals that pass this phase will proceed to phase two. If a proposal does not meet the Threshold Compliance Criteria, FloridaCommerce cannot proceed to score it for funding consideration.

Hurricane Sally Workforce Recovery Training Program Guidelines

2. Proposals will be reviewed and scored based on Program Scoring Criteria, as seen in Table 3. Each evaluator will evaluate and score responses. The maximum score is 200 points.

Table 2: Threshold Compliance Criteria

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

Table 3: Program Scoring Criteria

Program Scoring Criteria	
5 pts	Services for Individuals with Limited English Proficiency: Applicants will be awarded 5 points if services are available in Spanish.
5 pts	Leverage Funds: Applicants with additional funding will be awarded 5 points.
10 pts	Training Timeframe: Applicants will be awarded up to 10 points upon demonstration that the defined timeframe(s) for participant completion of training is(are) appropriate for the WRTP timeframe and supports Hurricane Sally recovery efforts.
10 pts	<p>Public Service: Demonstration that the proposal meets all HUD public service requirements. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 5 points – Application demonstrates that the proposed project will 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 Action Plan was submitted. • 5 points – Application demonstrates that WRTP participants, and any funds expended on WRTP participants, will be above and beyond any available number of training spaces and funding available for the same purpose, including existing funding and training spaces available through the Workforce Innovation and Opportunity Act, the Wagner-Peyser Act, or other federal, state, or local funding.
10 pts	<p>Support and Career Services: Quality and robust support and career services to provide support to trainees. Applicants may satisfy this criteria through submission of the support services to be offered to participants and statistics demonstrating successful delivery of support services in the five 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 delivery of support services in the five years immediately preceding the application.

Hurricane Sally Workforce Recovery Training Program Guidelines

<p align="center">10 pts</p>	<p>Graduate Placement: Demonstrated track record of success in providing similar workforce training services, including training graduate placement rate. The graduate placement score will be determined based upon the graduate placement rate reported by the applicant within the five years immediately preceding the application. The applicant should provide their graduate placement rate in a percentage form (rounded to the nearest whole number). Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 10 points – Graduate placement is at least 70% • 7 points – Graduate placement is 50%- 69% • 5 points – Graduate placement is 25%- 49% • 2 points – Graduate placement is 10%- 24% • 0 points – Graduate placement is less than 10%
<p align="center">15 pts</p>	<p>Staffing and Capacity: Staff demonstrate skill and experience necessary for implementing the proposed services and performing all grant functions. Points will be awarded as follows:</p> <p>Staffing (maximum 10 points):</p> <ul style="list-style-type: none"> • 10 points – Over 50% of the identified staff have five years or more in leadership, management, and implementation of workforce training programs and/or grant management. • 5 points – Between 25 - 50% of the identified staff have five years or more in leadership, management, and implementation of workforce training programs and/or grant management. • 0 points – Less than 25% of the identified staff have five years or more in leadership, management, and implementation of workforce training programs and/or grant management. <p>Capacity (maximum 5 points): Applicants will be awarded 5 points upon demonstration that the Respondent has the resources and capacity necessary for implementing the proposed services and performing necessary grant functions, including financial management and compliance.</p>
<p align="center">20 pts</p>	<p>Project Impact: The impact of the project to support recovery in the community and efficient use of the proposed use of funds. Applicants may be awarded up to 20 points based on the cost-effectiveness and range of services provided in the proposal.</p>
<p align="center">50 Pts</p>	<p>Workforce Training: Applicants will be awarded points upon demonstrating that proposed trainings support construction occupations or customized trainings tailored to the specific economic revitalization needs of a particular region and based on the number of occupations/trades for training activities. Applicants may satisfy this criteria through submission of a list of proposed occupations/trades for training activities. For all occupations/trades that are not construction occupations, applicants must provide statistics demonstrating the specific economic revitalization need for each occupation/trade specific to the local region. Points will be awarded as follows:</p> <ul style="list-style-type: none"> • 50 points – More than 5 Occupations/Trades • 30 points – 3-5 Occupations/Trades • 10 points – 1-2 Occupations/Trades

65 pts	<p>National Objective: Ability to serve target population to meet LMI national objective. Applicants may satisfy this criterion through submission of plan to meet the LMI national objective and statistics demonstrating successful delivery of support services in the 5 years immediately preceding the application. Points will be awarded as follows:</p> <p>The points awarded will be based on the percentage LMI of the community which is being served. For example, if the community service area LMI is 60%, FloridaCommerce will multiply by 65 (the maximum amount of points) to receive the final LMI score of 39.</p>
200 pts	Total maximum score

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

There is a maximum award of \$2,499,541.64. There is a minimum award of \$1,000,000. No entity may receive an award that does not comply with the maximum and minimum award thresholds.

4.8 Ineligible Entities

Any entity that is listed as excluded, debarred, or suspended on the System for Award Management (<https://sam.gov/SAM/>), including affiliated businesses with the same Employer Identification Number (EIN), is not eligible to receive WRTP funds and may not be selected as a subrecipient, partner, subcontractor, or vendor.

4.9 Eligible Costs

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

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

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

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

- Income payments, including trainee wages, housing costs, or stipends;
 - Income payments are payments to an individual or family, which are used to provide basic services such as food, shelter (including payment for rent, mortgage and/or utilities) or clothing (with the exclusion of wearable materials and supplies related to WRTP training activities, such as steel-toed boots, hard hats, etc.);
- Travel, material, or supply costs unrelated to WRTP training activities;
- Capital improvements or structural modifications;

- Furnishings and personal property, including motor vehicles and fixtures;
- Costs incurred prior to the date of execution of a subrecipient agreement;
- Political activities or lobbying;
- Expenditure of funds outside the counties detailed in Section 2.7 Eligible Areas above;
- Payments to a for-profit business while that business or business owner is the subject of unresolved findings for non-compliance with Community Development Block Grant 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.

4.10 Funding Method

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

4.11 Supplanting Funds

Subrecipients must utilize WRTP funds to supplement rather than supplant funds otherwise available. Subrecipients must document that WRTP funds awarded are above and beyond any annual appropriations that are provided for the same purpose, including funding from the Department of Labor, Department of Education, or other federal, state, or local funding. Subrecipients must also document that WRTP funds expended on any participant are above and beyond any other funding available through other sources for the same purpose, including any funding available through the Workforce Innovation and Opportunity Act, the Wagner-Peyser Act, or other federal, state, or local funding. **WRTP funds may only be utilized after all other funds available to provide benefits to the participant for the same purpose have been expended.** Any supplanting of funds will be treated as a DOB or fraud, waste, and abuse, and is subject to recapture under the terms of the subrecipient agreement.

4.12 Subrecipient Responsibilities

Subrecipients responsibilities include, but are not limited to:

- Enter into a Subrecipient Agreement with FloridaCommerce specific to the WRTP.
- Comply with all terms and conditions of the Subrecipient Agreement, these WRTP Hurricane Sally guidelines, policies and procedures published by FloridaCommerce, the Action Plan, and applicable federal, state, and local laws.
- Comply with applicable CDBG-DR cross-cutting regulations. For more information please see: <https://files.hudexchange.info/resources/documents/CDBG-DR-Cross-Cutting-Training-Resources.pdf>.
- Comply with the requirement that only completion and submission of the Rebuild Florida WRTP participant application will be considered as an individual's application for program services and benefits. Subrecipients may not substitute any other application for the Rebuild Florida WRTP participant application. Subrecipients may request additional information from WRTP applicants, but additional information must not be required. Applicant refusal to provide additional information or any additional information obtained by a subrecipient cannot be used as grounds to deny program access and/or determine participant eligibility. **Only the information in the Rebuild Florida WRTP participant application, including supporting documentation, may be considered for determination of an applicant's eligibility for program services and benefits.**
- Process all participant applications received for income determination, DOB, and eligibility.
- Comply with OLTR Language Access Plan requirements for Hurricane Sally impacted areas by providing access to services in English and Spanish.

- Develop policies and procedures as required by FloridaCommerce to ensure program compliance.
- Document all complaints, grievances, and appeals received. To comply with HUD requirements, a response to each complaint, grievance, or appeal must be made within 15 working days of receipt.
- Maintain books, records, and documents relating to the WRTP in accordance with applicable documentation standards and records retention requirements. Records must be made available to FloridaCommerce or its representatives upon request.
- For educational institution and technical center subrecipients, execute a Memorandum of Understanding (MOU) with the regional LWDB to comply with the requirements of 20 CFR 678.400.
- Ensure that any partners, subcontractors, vendors, or other entities to whom the subrecipient intends to disburse WRTP funds are not listed as excluded, debarred, or suspended on the System for Award Management (<https://sam.gov/SAM/>), including affiliated businesses with the same EIN.
- Comply with the requirement that subrecipients will not carry out any of the activities under their agreement with FloridaCommerce in a manner that results in a prohibited DOB as defined by Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (the “Stafford Act”).
- Provide required reports in the means, format, and frequency requested by FloridaCommerce.

4.13 Income Verification

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

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

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

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

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

4.14 Duplication of Benefits Verification

All subrecipients are required to conduct a DOB screening for any individual applying for services through the WRTP. The DOB process includes verification of assistance received relating to disaster recovery, workforce training, or other assistance provided for the same or similar purpose as the WRTP. Subrecipients are responsible for maintaining DOB records for individual applicants and for executing any MOUs or data sharing agreements necessary with federal, state, or local entities to verify benefits received (see 6.0 Duplication of Benefits).

4.15 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. All subrecipients will be subject to routine monitoring and compliance review by FloridaCommerce or its representatives. Additional reviews may be conducted by HUD. Monitoring reviews may be announced or unannounced. Monitoring may take place on site or remotely. For more information on monitoring, see the OLTR Compliance Monitoring Plan available at www.FloridaJobs.org/CDBG-DR.

5.0 Individual Participant Requirements

5.1 Participant Application

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

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

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

During the WRTP application process, subrecipients may request additional information from WRTP applicants, but additional information cannot be required. Applicant refusal to provide additional information or any additional information obtained by a subrecipient cannot be used as grounds to deny program access and/or determine participant eligibility.

5.2 Participant Priority

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

5.3 Participant Application Period

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

5.4 Income

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

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

- Wages, salaries, tips, commissions, etc.;
- Self-employment income from own nonfarm business, including proprietorships and partnerships;
- Farm self-employment income;
- Interest, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;

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

HUD publishes income limits annually. To determine LMI thresholds, the WRTP will use the published HUD income limits for each year as they are made available by HUD. The income limits in effect at the time of an individual's application for assistance will determine LMI status. HUD's 2022 income limits are outlined 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.

5.5 Additional Participant Qualifications/Requirements

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

Identity: All participants must provide documentation establishing proof of identity.

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

5.6 Eligibility Determination Process

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

5.7 Ineligible Participants

Any individual who applied for services through the WRTP and cannot provide the required documentation regarding income, work authorization, identity, or age, or otherwise fails to meet criteria in these guidelines, is ineligible for WRTP benefits (see 6.0 Duplication of Benefits).

5.8 Complaints or Grievances

Complaints or grievances may be filed regarding any and all concerns that subrecipients or participant applicants may have with the procedures followed and services provided by the WRTP. Complaints or grievances, except complaints alleging unlawful discrimination (as in 3.1 Equal Opportunity), 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 submitted to FloridaCommerce via:

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

Attention: Rebuild Florida Constituent Services
Florida Department of Commerce
107 East Madison Street

Caldwell Building, MSC 420

Tallahassee, FL 32399

- Email to: CMS@Commerce.fl.gov.

5.9 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 FloridaCommerce's appeals procedures. 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
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 the 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 the 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.

5.10 Certification Requirements to Receive Assistance

All participants must agree to the following to receive assistance:

- Sign a release so information provided by the participant applicant may be reviewed, disclosed, released, and shared as necessary to verify information and process the application. The

Hurricane Sally Workforce Recovery Training Program Guidelines

participant applicant and each household member 18 years of age or older is required to sign the release.

- Sign a fraud acknowledgement certifying that information provided by the participant applicant is true and correct, under penalty of law.
- Sign a subrogation agreement acknowledging that any overpayment or DOB will be subject to recapture.

6.0 Duplication of Benefits

6.1 Duplication of Benefits

Eligible participants may have previously received assistance from other sources for the same purpose as the WRTP. Under the requirements of the Stafford 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 its subrecipients must follow HUD's DOB guidance. Individual applicants and participants must provide any information on benefits received that may create a DOB during the application process and upon request. The subrecipient must perform due diligence verification of DOB information.

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

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

6.2 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 payments the participant receives for the same purpose after the participant has entered into a grant agreement for WRTP benefits.

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

By accepting the award, participants agree that they will report any duplicative funds to the program whenever received. Upon receipt of a report that additional benefits have been received, the program will recalculate the participant's award and provide instructions whether the participant's award will be reduced by such amount, or whether the participant must remit such amounts to the program as reimbursement (when additional assistance received after program disbursements). Each participant will execute and be bound by a subrogation agreement.

Participants must agree to subrogate (commit to the state of Florida) any future payments they may receive after award from any sources that represent a potential DOB. 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

Hurricane Sally Workforce Recovery Training Program Guidelines

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										
FY 2022 Income Limit Area	Median Family Income	FY 2022 Income Limit Category	Persons in Household							
			1	2	3	4	5	6	7	8
Bay County	\$78,100	Very Low (50%) Income Limits (\$)	26,300	30,050	33,800	37,550	40,600	43,600	46,600	49,600
		Extremely Low Income Limits (\$)*	15,800	18,310	23,030	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$)	42,100	48,100	54,100	60,100	64,950	69,750	74,550	79,350
Escambia County	\$79,500	Very Low (50%) Income Limits (\$)	27,100	30,950	34,800	38,650	41,750	44,850	47,950	51,050
		Extremely Low Income Limits (\$)*	16,250	18,600	23,030	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$)	43,300	49,500	55,700	61,850	66,800	71,750	76,700	81,650
Okaloosa County	\$90,600	Very Low (50%) Income Limits (\$)	30,800	35,200	39,600	43,950	47,500	51,000	54,500	58,050
		Extremely Low Income Limits (\$)*	18,450	21,100	23,750	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$)	49,250	56,250	63,300	70,300	75,950	81,550	87,200	92,800

Hurricane Sally Workforce Recovery Training Program Guidelines

Santa Rosa County	\$79,500	Very Low (50%) Income Limits (\$)	27,100	30,950	34,800	38,650	41,750	44,850	47,950	51,050
		Extremel y Low Income Limits (\$)*	16,250	18,600	23,030	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$)	43,300	49,500	55,700	61,850	66,800	71,750	76,700	81,650
			Persons in Household							
			1	2	3	4	5	6	7	8
Walton County	\$79,500	Very Low (50%) Income Limits (\$)	27,250	31,150	35,050	38,900	42,050	45,150	48,250	51,350
		Extremel y Low Income Limits (\$)*	16,350	18,700	23,030	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$)	43,600	49,800	56,050	62,250	67,250	72,250	77,200	82,200

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