

STATE *of* FLORIDA

# RECOVERY HOUSING PROGRAM ACTION PLAN AMENDMENT JULY 2023

Submitted to the United States Department of Housing and Urban Development (HUD) in fulfillment of the requirements for the Recovery Housing Program.

DRAFT FOR PUBLIC COMMENT JULY 2023



**FLORIDACOMMERCE**

FloridaCommerce  
Bureau of Small Cities and Rural  
Communities  
Main Line: 850.717.8405

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## Executive Summary

In 2018, Congress authorized the federal Recovery Housing Program (RHP) under [Section 8071](#) of the SUPPORT for Patients and Communities Act (SUPPORT Act). RHP funds are allocated by the United States Department of Housing and Urban Development (HUD) to allow states to provide stable, transitional housing for individuals in recovery from a substance use disorder. RHP grant funds are treated as Community Development Block Grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, with the rules being modified by Federal Register Notice FR-6225-N-01.

FloridaCommerce was awarded \$871,000 for Federal Fiscal Year (FFY) 2020 and \$786,114 for FFY 2021 in RHP funding, for a total of \$1,657,114. FloridaCommerce's FFY 2020-21 RHP Action Plan guides the use of both allocations.

FloridaCommerce is amending the FFY 2020-21 RHP Action Plan to incorporate statutory changes renaming the Department of Economic Opportunity (DEO) to the Department of Commerce (FloridaCommerce), include the FFY 2022 and FFY 2023 RHP allocations, and provide guidance for the use of these funds. HUD allocations include \$875,877 for FFY 2022 and \$1,140,440 for FFY 2023.

FloridaCommerce has identified a specific need for additional recovery housing and services for the veteran community within the state. The goals of the 2020-21 and 2022-23 RHP are to help existing public or private nonprofit organizations, or units of local government provide stable, temporary housing to veterans in recovery from substance use disorders. RHP funds may be used to provide relocation payments and rental assistance, as well as new construction, acquisition, and/or rehabilitation of facilities or housing.

Assistance from the RHP is limited, per individual, to a period of not more than two years, or until the individual secures permanent housing, whichever is earlier. FloridaCommerce will administer and monitor the use of RHP funds to ensure compliance with program rules.

FloridaCommerce will distribute funds by requesting proposals from public or private nonprofit organizations and units of local government who prioritize serving veterans in recovery from substance use disorders. FloridaCommerce will evaluate the proposals received and then make one or more subgrants to the applicants that best meet the criteria set forth in the "Applicant Evaluation Criteria" section of this Action Plan. Additionally, for the FFY 2022 and FFY 2023 RHP Allocations, for public or private nonprofit proposals that involve activities exceeding those within 24 CFR 58.34 and 24CFR 58.35(b), the nonprofit must partner with a unit of local government or other body able to assume the role of Responsible Entity as defined in 24 CFR 58.2(a)(7). In

this partnership, the unit of local government will ensure that the public or private nonprofit follow all applicable policies and procedures for the program. Eligible subrecipients must have proven success in providing services to veterans in recovery to help them attain self-sufficiency and meet individual recovery goals.

## Definitions

The following definitions apply to Florida's Recovery Housing Program.

### Individual in Recovery

According to the Florida Substance Abuse and Mental Health Program (SAMH) and the United States Department of Health and Human Services Substance Abuse and Mental Health Services Administration (SAMHSA) the working definition of an individual in recovery is an individual who:

- Is overcoming or managing one's disease(s) or symptoms and making informed, healthy choices that support physical and emotional well-being;
- Has a stable and safe place to live;
- Is conducting meaningful daily activities;
- Is working toward the independence, income, and resources to participate in society; and
- Has relationships and social networks that provide support, friendship, love, and hope.<sup>1</sup>

### Substance Use Disorder

As defined by SAMHSA, substance use disorders occur when the recurrent use of alcohol and/or drugs causes clinically significant impairment, including health problems, disability, and failure to meet major responsibilities at work, school, or home.<sup>2</sup>

### Recovery Residences

As defined by Section 397.311, Florida Statutes, a recovery residence is:

- A residential dwelling unit, the community housing component of a licensed day or night treatment facility with community housing, or other form of group housing, which is offered or advertised through any means, including oral, written, electronic, or printed means, by any person or entity as a residence that provides a peer-supported, alcohol-free, and drug-free living environment.<sup>3</sup>

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<sup>1</sup> Substance Abuse and Mental Health Services Administration. "Recovery and Recovery Support" April 23, 2020. <https://www.samhsa.gov/find-help/recovery>

<sup>2</sup> Substance Abuse and Mental Health Services Administration. "Mental Health and Substance Use Disorders" April 30, 2020. <https://www.samhsa.gov/find-help/disorders>

<sup>3</sup> Section 397.311 F.S. Accessed May 24, 2021. <https://www.flsenate.gov/laws/statutes/2020/397.311>

## Florida Association of Recovery Residences

The Florida Association of Recovery Residences (FARR) was founded in 2011 to evaluate and monitor standards-based recovery support services provided in community-based, residential settings throughout Florida. FARR is the Florida Affiliate of the National Alliance for Recovery Residences (NARR). NARR is a 501(c)(3) nonprofit organization that has developed the most widely referenced national standard for the operation of recovery residences. Recovery residences that operate in accordance with NARR's quality standards are recognized by SAMHSA. As of **July 11, 2022**, there are **430** FARR certified recovery residences in Florida. A list of certified recovery residences from FARR can be found online [here](#).

NARR defines the spectrum of recovery-oriented housing and services and distinguishes four different types, which are known as “levels” or “levels of support” through its national standard for recovery residences. The standard was developed through a collaborative approach that solicited input from all major regional and national recovery housing organizations. The full text of NARR's recovery standard and code of ethics for recovery residences can be found online [here](#).

### SAMHSA-Recognized NARR Quality Standards for Recovery Residences

**Level I – Peer Run** residences are democratically run and adhere to an agreed upon set of policies and procedures, including requirements for regular drug screening, house meetings among residents, and encouragement of residents to attend self-help meetings.

**Level II – Monitored** residences are staffed with a House Manager or Senior Resident who ensures adherence to house rules. Residents participate in peer-run groups, drug screenings, and house meetings among residents while also being encouraged to attend self-help and/or treatment services.

**Level III – Supervised** residences are part of an organization that provides administrative oversight and is licensed according to state requirements. Residents receive clinical services offsite while supportive services are offered on site to promote life skill development.

**Level IV – Service Provider** residences are offered in a variety of settings and are often a step down from residential treatment or detoxification facilities. These settings are overseen by an organization that offers both clinical and administrative supervision, and may be licensed according to state requirements. Operators adhere to policies and procedures and offer in-house clinical services and life skill development programming.<sup>4</sup>

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<sup>4</sup> UNITED STATES Department of Housing and Urban Development. “Recovery Housing Program Models” May 2021. <https://files.hudexchange.info/resources/documents/RHP-Program-Models-Quick-Guide.pdf>

## Program Summary

Section 8071 of SUPPORT Act allocated funding for states to provide stable, temporary housing assistance to individuals in recovery from a substance use disorder, under the *Pilot Program to Help Individuals in Recovery From a Substance Use Disorder Become Stably Housed* (Recovery Housing Program).

FloridaCommerce was allocated RHP funding from HUD as follows:

RHP Allocations	
FFY 2020	\$ 871,000
FFY 2021	\$ 786,114
FFY 2022	\$ 875,877
FFY 2023	\$1,140,440
<b>TOTAL</b>	<b>\$3,673,431</b>

Federal Register Notice FR-6225-N-01 requires that RHP funds be treated as CDBG funds, with certain waivers and alternative requirements.

Florida received RHP funds because the state's age-adjusted rate of drug overdose deaths is above the national rate at 22.78 people per 100,000, according to the Centers for Disease Control and Prevention (CDC).<sup>5</sup>

FloridaCommerce has identified a specific need for additional recovery housing and services for the veteran community within the state. The United States Department of Veterans Affairs FY 2017 population estimates reflect that Florida has the third largest veteran population among all states in the nation. According to the National Institute on Drug Abuse (NIDA), more than one in ten veterans have been diagnosed with a substance use disorder, which is slightly higher than the general population.<sup>6</sup>

The specific goals of the FFY 2020-21 and FFY 2022-23 RHP are to help existing public or private nonprofit organizations or units of local government provide stable recovery housing. RHP funds will be given to organizations that best meet the application evaluation criteria outlined in this plan. Funds may be used for relocation payments, rental assistance, new construction, acquisition, and/or rehabilitation of housing facilities.

Subrecipients of the Florida RHP must demonstrate the ability to operate recovery facilities or housing and directly or indirectly provide services for participants. However, operating costs and costs of providing services will not be provided for with RHP funding. Subrecipients are encouraged to coordinate services with other federal and non-federal assistance related to homelessness and employment. The assistance from

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<sup>5</sup> Rossen LM, Bastian B, Warner M, Khan D, Chong Y. "Drug poisoning mortality: United States, 1999–2018." CDC. August 25, 2020. <https://www.cdc.gov/nchs/data-visualization/drug-poisoning-mortality/>.

<sup>6</sup> National Institute on Drug Abuse; National Institutes of Health; UNITED STATES Department of Health and Human Services. "Substance Use and Military Life DrugFacts". October 2019. <https://www.drugabuse.gov/publications/drugfacts/substance-use-military-life#ref>.

the RHP is limited to a period of no more than two years, or until the individual secures permanent housing.

## Resources Summary

FloridaCommerce was allocated RHP funding from HUD as follows:

RHP Allocations	
FFY 2020	\$ 871,000
FFY 2021	\$ 786,114
FFY 2022	\$ 875,877
FFY 2023	\$1,140,440
<b>TOTAL</b>	<b>\$3,673,431</b>

Nonprofit and private resources may be committed by subrecipients to leverage RHP funding.

## Administration Summary

FloridaCommerce will be the sole state agency responsible for the administration of RHP funds and will use program staff to administer the funds for the State of Florida.

FloridaCommerce's RHP contact person is:

**Shaurita Jackson**

Deputy Bureau Chief

Bureau of Small Cities and Rural Communities

FloridaCommerce

Office: 850-717-8416

[Shaurita.Jackson@Commerce.fl.gov](mailto:Shaurita.Jackson@Commerce.fl.gov)

## Use of Funds

### Method of Distribution

FloridaCommerce will distribute funds by seeking proposals from private and public organizations, or units of local government, that prioritize serving veterans in recovery from substance use disorders. FloridaCommerce will evaluate the proposals received and then make one or more subgrants to the proposals that satisfy eligibility requirements and best meet the evaluation criteria defined below. Additionally, for the FFY 2022 and FFY 2023 RHP Allocations, for public or private nonprofit proposals that involve activities exceeding those within 24 CFR 58.34 and 24CFR 58.35(b), the nonprofit must partner with a unit of local government or other body able to assume the role of Responsible Entity as defined in 24 CFR 58.2(a)(7). In this partnership, the unit of local government will ensure that the public or private nonprofit follows all applicable policies and procedures for the program.

## Eligible Activities

- **Public Facilities and Improvements:** RHP funds may be used only for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.
- **Acquisition of Real Property:** RHP funds may be used for acquisition of real property for the purpose of providing stable, temporary housing to persons in recovery from a substance use disorder. For example, a nonprofit could purchase a residential property for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.
- **Lease, rent, and utilities:** RHP funds may be used to make payments for lease, rent, utilities, and associated costs (e.g. fees) to provide stable, temporary housing, on behalf of an individual in recovery from a substance use disorder.
- **Residential Rehabilitation and Reconstruction of Single-Units:** RHP funds may be used for rehabilitation, reconstruction or improvements of publicly- or privately-owned, single-unit residential buildings for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.
- **Residential Rehabilitation and Reconstruction of Multi-Units:** RHP funds may be used for rehabilitation, reconstruction or improvements of publicly- or privately-owned buildings with two or more permanent residential units that otherwise comply with 24 CFR 570.202(a) and section 105(a)(4) for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.
- **Rehabilitation and Reconstruction of Public Housing:** RHP funds may be used for rehabilitation, reconstruction, or improvements of buildings owned and operated by a public housing authority.
- **Relocation:** RHP funds may be used for relocation payments and other assistance for permanently or temporarily displaced individuals and families in connection with activities using RHP funds.
- **Expansion of Existing Eligible Activities to Include New Construction:** RHP funds can be used for new construction housing to the extent that the newly constructed housing shall be used for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

## Ineligible Activities

RHP funds may not be used for operational expenses, staff pay, or planning costs.



## Eligible Subrecipients

Eligible subrecipients include public and private nonprofit organizations and local governments that have proven experience in providing services to veterans in recovery from substance use disorders to help them attain self-sufficiency and individual recovery goals. Eligible subrecipients will be limited to local governments and public and private nonprofit organizations that best meet the defined evaluation criteria.

## Applicant Evaluation Criteria

**FloridaCommerce** will evaluate eligible applicants and activities based on the following HUD-established and additional criteria defined by **FloridaCommerce**. Priority will be given to entities with the greatest need and entities with the ability to deliver effective assistance in a timely manner.

### HUD Criteria One: Entities with the Greatest Need

**FloridaCommerce** will select one or more applicants with the greatest need by evaluating applicants that demonstrate demand based on current service data for the housing solution. **FloridaCommerce** will require applicants to provide quantitative projected demand and the financial assistance needed for the proposed housing solution. **FloridaCommerce** will also require applicants to provide detailed information about the size of the service area and number of potential beneficiaries.

### HUD Criteria Two: Entities with the Ability to Deliver Assistance in a Timely Manner

The following criteria will be used to evaluate applicant's ability to deliver assistance in a timely manner:

1. Organizations and project team members who evidence the capacity to operate and complete a project;
2. Demonstrated experience operating facilities or housing for those in recovery and/or providing recovery housing to veterans in recovery;
3. Prior experience utilizing CDBG or other federal funds; and
4. Evidence that the proposed project will ensure timely expenditure of subgrant funds.

## Program Requirements

In addition to the HUD criteria, subrecipients must demonstrate capacity to comply with standard RHP program requirements, including:

1. 24 CFR 570.489(g) regarding procurement;
2. Environmental review requirements of 24 CFR Part 58;
3. Uniform Relocation and Real Property Acquisition Act (URA);
4. Federal Labor Standards, including the Davis-Bacon and Related Acts;

5. 24 CFR 42.375 regarding demolition or change in use of lower-income dwelling units;
6. 2 CFR 200 regarding financial records and audits;
7. Section 3 employment opportunities; and
8. National Objective Requirements:
  - a. The CDBG program Low- and Moderate-Income (LMI) Persons national objective requires at least 51 percent of the individuals served to be at or below 80 percent of area's median income. The Slums and Blight and Urgent Need national objectives are not eligible for this program.

### Additional Criteria

In addition to the HUD criteria and Program Requirements, the following factors will also be used to evaluate proposals for RHP funding:

1. Proof that the proposed project is for the purpose of providing recovery housing.
2. Documentation and information showing that the resources needed to manage the proposed activity or project are available and ready, and that the commitment for operation and maintenance, where applicable, has been certified.
3. The organization's need and justification for RHP funds must be evidenced.
4. The project's cost reasonableness and feasibility.
5. Proof of the organization's existing services and ability to provide comprehensive recovery housing.
6. Projects or proposals that focus recovery housing efforts towards veterans' groups will be given funding priority.
7. Projects or proposals that leverage other Federal resources and develop partnerships to maximize the impact of RHP funding.
8. Projects or proposals that demonstrate use of and experience coordinating with other supportive services within the community, including workforce sustainability.
9. Organization's must have a process or establish a process for tracking and reporting beneficiaries to [FloridaCommerce](#).
10. Projects and proposals must reasonably demonstrate the ability to provide quantifiable proposed outcomes to be considered for funding. Projects will be evaluated on program impact to beneficiaries using defined success measures, cost reasonableness, and the potential cost per beneficiary.

# Anticipated Outcomes & Expenditure Plan

## Expenditures

To ensure that 30 percent of RHP funds are expended within twelve months of execution of the RHP grant agreement with HUD, FloridaCommerce will issue a Notice of Funding Availability within 120 days of the RHP grant agreement. To comply with the requirement of expending 100 percent of the funds by September 1, 2027.

FloridaCommerce will closely monitor and work with subgrantees to ensure timely expenditure of funds.

## Administrative Costs

FloridaCommerce will retain 3 percent of the RHP funds for technical assistance and 5 percent for administrative costs.

FFY	Total Allocation	Technical Assistance 3%	Administrative 5%
2020	\$ 871,000	\$ 26,130	\$ 43,550
2021	\$ 786,114	\$ 23,584	\$ 39,306
2022	\$ 875,877	\$ 26,276	\$ 43,794
2023	\$1,140,440	\$ 34,213	\$ 57,022
<b>TOTALS</b>	<b>\$3,673,431</b>	<b>\$110,203</b>	<b>\$183,672</b>

FloridaCommerce will monitor the expenditure of administrative funds to ensure that administrative costs will not exceed the allotment.

## Anticipated Outcomes

FloridaCommerce anticipates funding projects and proposals that reasonably demonstrate the ability to provide quantifiable proposed outcomes. Projects will be evaluated on program impact to beneficiaries using defined success measures, cost reasonableness, and the potential cost per beneficiary. FloridaCommerce will work with subrecipients with an established process for tracking and reporting beneficiaries.

FloridaCommerce will report RHP outcomes using a process such as tracking the number of beneficiaries assisted, the total program impact on beneficiaries assisted, the number of beneficiaries able to transition to permanent housing in relation to total costs, the number of beneficiaries gaining self-sufficiency, the number of housing units made available for beneficiaries, or the total number of individuals assisted with RHP funds.

## Citizen Participation

The Citizen Participation process for the RHP will follow the requirements of the Florida Small Cities CDBG citizen participation plan including a 15-day public comment period and public hearing.

[TO BE UPDATED AFTER PUBLIC COMMENT PERIOD]

## Partner Coordination

**FloridaCommerce** will evaluate proposals that coordinate RHP funding with other federal, state, or local funding, including organizations, such as the United States Department of Labor (USDOL), the United States Department of Health and Human Services (HHS), the Florida Department of Veterans' Affairs (FDVA), Florida Department of Health, local governments and community action agencies on programs such as the USDOL Homeless Veterans' Reintegration Program (HVRP), the HHS Low Income Home Energy Assistance Program (LIHEAP), and HUD Veterans Affairs Supportive Housing Program (HUD-VASH).

## Subrecipient Management & Monitoring

**FloridaCommerce** has pre-established monitoring processes to ensure that RHP requirements (including non-duplication of benefits) are met. Subrecipients will be required to monitor project performance including the performance of any consultants or subcontractors who are paid from RHP funds. **FloridaCommerce** will conduct monitoring activities based on the results of a risk assessment of each subrecipient. Monitoring activities may address compliance with program requirements, such as environmental review processes, procurements, labor standards, requests for funds, closeout reports, audits, and uniform relocation assistance. Subrecipients shall make all data and records available as necessary for **FloridaCommerce** staff to complete accurate evaluations of contracted activities. Subrecipients will be notified in writing regarding the results of monitoring activities, which will include the monitoring results, instructions on how to address non-compliance if any, and a response deadline.

## Pre-Agreement Costs

RHP funds retained by **FloridaCommerce** for technical assistance and administrative costs may be used for reimbursement of pre-award/pre-agreement technical assistance and for application technical assistance to potential subrecipients, development of the RHP Plan, conduct of the citizen participation process, and other related administrative costs.

## Certifications

**FloridaCommerce** submits this Action Plan to HUD along with a separate, executed state certifications form.

## Standard Forms 424 and 424D

**FloridaCommerce** submits this Action Plan to HUD along with completed and executed Federal Forms SF-424 and SF-424D.