

Manatee County, Florida

# Buyout and Safe Housing Program Guide

Hurricanes Debby, Helene, and Milton



# Change Log

Version	Date	Description
1	3/16/2026	Buyout and Safe Housing Program Guide

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# Introduction

On January 16, 2025, the United States (U.S.) Department of Housing and Urban Development (HUD) formally allocated \$252,711,000 in CDBG-DR funds to the County of Manatee (“County”) to support long-term recovery efforts following Hurricanes Debby, Helene, and Milton (“2024 Hurricanes”) via the January 16, 2025, [Federal Register Notice \(90 FR 4759\)](#) (“Allocation Announcement Notice”). The County’s Community Development Block Grant Disaster Recovery (CDBG-DR) [Action Plan](#), approved by HUD, identified Housing, Infrastructure, Mitigation, and Planning activities to address the impacts of the 2024 Hurricanes. As the designated grantee, the County is administering the programs identified in the CDBG-DR Action Plan in accordance with HUD’s January 8, 2025, [Federal Register Notice \(90 FR 1754\)](#) (Updated March 19, 2025) (“Revised Universal Notice”), which outlines eligible activities, waivers, and requirements for CDBG-DR grantees. The Revised Universal Notice governs the County’s CDBG-DR allocation.

## Purpose of the Guide

This Program Guide provides the administrative framework, eligibility requirements, and implementation procedures for the County’s CDBG-DR Buyout and Safe Housing (BSH) Program. The guide serves County staff, beneficiaries, and other parties as a reference for program administration, compliance, and reporting throughout the life of the program. It outlines the responsibilities, funding processes, applicable federal regulations, and performance expectations to ensure transparency, efficiency, and alignment with HUD’s requirements for disaster recovery.




Note that this Program Guide is only intended to address the County’s CDBG-DR housing initiatives specific to the BSH Program. Each of the other recovery programs outlined in the County’s Action Plan are governed by its own Program Guide.

## Program Overview

The County has allocated \$12,000,000 of its total CDBG-DR award to the BSH Program, an initiative focused on reducing risk to life and property by permanently removing flood-prone and repetitively damaged residential structures from hazard-prone areas. The BSH Program will prioritize assistance in targeted locations throughout the County that include Low- and Moderate-Income (LMI) households and those located in Special Flood Hazard Areas (SFHAs),

or other repetitive loss zones.<sup>1</sup> Existing structures on properties acquired through the BSH will be demolished and the site cleared. Consistent with the Revised Universal Notice, the land will be deed-restricted upon purchase to allow only for the re-use options identified in Figure 1.

Figure 1 – Eligible Long-Term Use Options

		
<p><b>Natural Green Space</b></p>	<p><b>Recreation</b></p>	<p><b>Stormwater Management</b></p>

The BSH Program offers buyouts to eligible Applicants at an amount up to 100 percent of the pre-disaster fair market value (FMV). Participating households that relocate to safer areas may be eligible for relocation assistance and incentives to secure housing outside of the SFHA and other high-risk flood areas. The maximum amount of assistance (buyout plus incentive) per household shall not exceed \$450,000 unless justified by unique circumstances and approved in accordance with program policy.

Participation is voluntary and will follow the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and applicable HUD regulations. While the County understands that the use of eminent domain to buyout properties is prohibited by the Revised Universal Notice, the County may request a waiver from HUD to successfully complete a buyout.

This program supports the County’s long-term recovery goals by addressing documented housing impacts, preventing future displacement, and restoring high-risk areas to open space. Through direct implementation and contractor support, the County will manage all phases of the BSH Program, including outreach, application processing, eligibility verification,

<sup>1</sup> HUD, at 24 CFR 55, defines a floodplain as an area subject to inundation from a flood having a one percent or greater chance of being equaled or exceeded in any given year. FEMA, at 44 CFR 59.1, defines a SFHA as the land in the floodplain within a community subject to a 1 percent or greater chance of flooding in any given year. For purposes of the BSH Program, the County will use the term SFHA.

property appraisal, environmental review, and closing, in alignment with HUD's Revised Universal Notice, applicable cross-cutting regulatory requirements, and the County's Action Plan.

## Appraisals

### Pre-Disaster Valuation

The County's basic approach will be to determine buyout offers based on pre-disaster FMV. This approach is intended to ensure Applicants receive maximum value, within BSH program parameters, based on the value of their property prior to damage caused by the 2024 Hurricanes.

The following methods may be used to establish pre-disaster FMV:

- An adjusted pre-disaster tax assessment, using an applicable Manatee County assessment and multipliers derived from comparable market data to reflect market conditions in effect prior to the 2024 Hurricanes.
- A Uniform Standards of Professional Appraisal Practice (USPAP)-compliant appraisal performed prior to 2024 Hurricanes. Such appraisals must have been:
  - Conducted by a Florida-certified and licensed appraiser;
  - Based on market conditions immediately preceding the 2024 Hurricanes; and
  - Supported by documentation, such as comparable sales, market trends, and property condition at the time.
- A retrospective appraisal, performed by a licensed appraiser at the County's expense, estimating the property's market value as of a specified date immediately preceding the 2024 Hurricanes.

If an Applicant does not agree with the buyout amount offered by the County based on the appraisal conducted by the County, they may, at their own expense, obtain an independent third-party appraisal and submit it to the County for consideration. The appraisal must meet the requirements of a pre-disaster appraisal as outlined above and be submitted within 30 calendar days of the County initial offer. The County is under no obligation to accept the Applicant-provided appraisal but may revise its offer based on information reflected in that appraisal.

## Post-Disaster Valuation

If a County or Applicant-provided appraisal indicates that the post-disaster FMV is greater than the pre-disaster FMV, the County may use that information and base the buyout offer on the post-disaster FMV of the property.

If post-disaster FMV is considered, the County will review each request on a case-by-case basis and may consider the current condition of the property, including documented disaster-related repairs. Increases in value resulting from non-essential improvements or upgrades may be excluded at the County's discretion. Approval of post-disaster appraisals will be based on consistency with CDBG-DR program requirements, cost reasonableness standards, and overall program policy.

Post-disaster FMV must:

- Be established through a certified appraisal reflecting current market conditions;
- Be conducted by a Florida-certified and licensed appraiser;
- Comply with USPAP;
- Be supported by documentation, such as comparable sales, market trends, and property condition at the time; and
- Buyout amount must not exceed current FMV.

## Purchase Offer

Following an eligibility determination, and once a buyout amount has been calculated, the Applicant will receive an offer from the County to purchase their property. Within 14 calendar days of the date of the County's offer, the Applicant must either sign a voluntary participation agreement as provided by the County or notify the County (via an email to the designated email account) that they intend to present the County with an updated appraisal prepared by a licensed appraiser within 30 calendar days of the County's initial offer. This appraisal is at the expense of the Applicant, and the County is not liable for reimbursement. The County will review the Applicant-supplied appraisal within 10 business days of receipt and may use information from that appraisal to revise its buyout offer. Applicants will be notified by email or regular mail of the disposition of the review and any revised offer. The revised offer will represent the County's best and final buyout offer and will not be subject to further negotiation. Applicants will have 14 calendar days from the date of the revised buyout offer to execute the voluntary participation agreement offered by the County.

## Title and Legal Services

Prior to closing, a title search will be conducted for each property. A clear, insurable title is required for participation in the program and must be available prior to closing. The County will identify and may attempt to resolve issues such as:

- Heirship or probate;
- Unreleased liens or mortgages;
- Ownership held in trusts, estates, or through joint tenancy.

Title issues such as probate, heirship, or outstanding encumbrances must be resolved to the County's satisfaction. The BSH Program may cover the legal fees associated with resolving title issues on behalf of Applicants. In cases where resolution is not feasible within a reasonable timeframe, the County reserves the right to withdraw or defer the application based on program timelines and resource constraints.

## National Objectives

All activities funded under the BSH Program must meet at least one of HUD's National Objectives, as set forth in 24 CFR 570, Subpart C and HUD's Revised Universal Notice.

The applicable National Objectives for the BSH Program are:

- Low- and Moderate-Income (LMI) Area Benefit (LMA) – 24 CFR 570.208(a)(1)
- Low- and Moderate-Income Housing Benefit (LMH) – 24 CFR 570.208(a)(3)
- Urgent Need (UN) – 24 CFR 570.208(c)

The County will assign a National Objective to each activity at the time of eligibility determination and will maintain supporting documentation in the program file.

## Meeting a National Objective

County staff are responsible for assigning and documenting the applicable National Objective during the eligibility and review process but will endeavor to qualify most buyouts as having LMI benefit to support the statutory requirement that at least 70 percent of the County's CDBG-DR funds be spent for activities that benefit LMI persons. The following summarizes how each National Objective is operationalized:

### **Low- and Moderate-Income Area Benefit (LMA) – 24 CFR 570.208(a)(1):**

- Applies when the end use of the acquired property will benefit a defined geographic area where at least 51 percent of residents are LMI.

- Qualifying uses include conversion to open space, flood mitigation, or passive recreational areas.
- Staff will use HUD-provided Low- and Moderate-Income Summary Data (LMISD) data or other approved sources to verify the service area's LMI status.
- Documentation must include maps, census data, and narrative justification.

**Low- and Moderate-Income Housing Benefit (LMH) – 24 CFR 570.208(a)(3):**

- Applies when the program provides direct housing benefit to an income-qualified household (i.e., household income is less than or equal to 80 percent of the Area Median Income for Manatee County).
  - This may include a combination of voluntary buyout and Safe Housing Incentive assistance.
- County staff must verify both income and occupancy status at the time of the 2024 Hurricanes.
- Required documentation includes income certification forms and pre-disaster residency proof.

**Urgent Need (UN) – 24 CFR 570.208(c):**

- May be used when a property poses an immediate risk to health or safety due to disaster-related damage or repetitive loss, and no alternative financial resources are available.
- Staff must maintain documentation of:
  - The immediate threat (e.g., FEMA flood data, repetitive loss designation);
  - Its disaster-related origin; and
  - The lack of other feasible solutions or funding sources.

Each activity's National Objective designation and supporting documentation must be retained in the program file and be available for HUD review.

# Program Administration

## Lead Agency and Roles and Responsibilities

Table 1 – Lead Agency Contact Information

<b>Manatee County Grants Administration Division</b>	
<b>Phone</b>	(941) 742-4787
<b>Email</b>	info@lastingmanatee.org
<b>Mail</b>	Manatee County, Government Relations Attn: Lasting Manatee 1112 Manatee Avenue West, Bradenton, FL 34205

The County’s Grants Administration Division, located within the Government Relations Department, is the designated CDBG-DR grantee and lead agency responsible for the administration and oversight of the BSH Program. The Grants Administration Division will retain full responsibility for ensuring compliance with federal requirements and for all aspects of program implementation. This includes:

- Public communications and program outreach;
- Applicant intake, eligibility screening, and prioritization;
- Duplication of benefits (DOB) analysis and income verification;
- Coordination of appraisals, title review, and environmental assessments;
- Offer generation and execution of buyout agreements;
- Disbursement of acquisition and relocation funds; and
- Recording deed restrictions and ensuring post-buyout compliance.

The County may engage qualified vendors to provide technical support (e.g., legal, appraisal, environmental, etc.), but all program decisions and compliance obligations remain with the County.

## Program Timeline

Table 2 represents a high-level timeline from the point of a full application being submitted to the final project monitoring visit being completed. It is important to note that the timeline may vary based on the buyout’s complexities and the Applicant’s ability to provide necessary documentation.

Table 2 – Anticipated Buyout Timeline

Program Milestones and Deliverables	Anticipated Timeline
Application Portal Opens	3 to 6 months
Eligibility Screening & Environmental Assessment are Conducted	3 to 6 months
Purchase Offer and Agreement Execution	6 to 12 months
Closing and Deed Recording	6 to 12 months
Safe Housing Incentive Disbursed & Demolition is Conducted	12 to 24 months
Final Monitoring and Compliance Visit	12 to 24 months

## Eligibility Criteria and Assistance Types

This section outlines the specific property types and conditions that determine program eligibility.

### Applicant Eligibility

Pursuant to 24 CFR Part 5 Subpart E, HUD is prohibited from making financial assistance available to persons who are not in eligible status with respect to citizenship or noncitizen immigration status. The County will follow [HUD Handbook 4350.3](#) and will verify legal noncitizen status through the Systematic Alien Verification for Entitlements (SAVE) system.

### Eligible Property Types

Eligible properties must be owned by an Applicant and is the site either of an existing residential dwelling of no more than four (4) units or had a residential dwelling on it that was destroyed by the 2024 Hurricanes. A dwelling is defined as a residential space that is a place of permanent habitation for a person or family that contains a living room, kitchen area, sleeping area(s), and bathroom(s).

The following property types are eligible for assistance under the BSH Program:

- Single-Family Property (detached and attached 1-4 units)
- Mobile and Manufactured Housing Units (MHU)

## Ineligible Property Types

The following property types are not eligible for assistance under the BSH Program:

- Second homes and vacation residences
- Short-term, seasonal, and vacation rental properties
- Properties acquired after the 2024 Hurricanes
- Properties that do not meet the disaster-related damage requirement
- Properties used exclusively for non-residential or commercial purposes

## Eligible Costs

Eligible costs under this program include:

- Buyout of primary residences affected by the 2024 Hurricanes
- Buyout of repetitive loss residential properties
- Legal fees associated with resolving title issues.
- Fees for necessary appraisal costs, title search, title insurance, property inspection, and survey, if applicable
- Demolition and clearance of structures
- Environmental remediation of sites (if necessary)
- Reasonable moving expenses for displaced households
- Optional relocation assistance, including:
  - Down payment assistance for the purchase of replacement housing
  - Temporary rental assistance
  - Safe Housing Incentive payments for relocation to lower-risk areas
- Site restoration for open space, floodplain management, green infrastructure, or passive recreation uses

## Ineligible Costs

The following activities are not eligible for reimbursement under the BSH Program:

- Buyouts of second homes, vacation residences, short-term, seasonal, and vacation rental properties
- Any activity not identified as an eligible activity for the BSH program in the County's HUD-approved CDBG-DR Action Plan
- Costs related to post-disaster rehabilitation or reconstruction of structures acquired through the buyout program, unless explicitly approved through a HUD waiver

## Site Eligibility

To qualify, properties must:

- Be located in flood-prone areas, such as floodplains, floodways, SFHAs or repetitive loss zones, or a Disaster Risk Reduction Area;
- Meet the definition of a Repetitive Loss property, as defined by FEMA;<sup>2</sup>
- Be within the jurisdiction of Manatee County;
- Have been owned by the Applicant at the time of the disaster; and
- Be free from legal barriers that prevent acquisition.

## Disaster Risk Reduction Area

Pursuant to the Revised Universal Notice, buyouts are permitted in a floodway, floodplain, or other Disaster Risk Reduction Area (DRRA). The County may utilize DRRA designation to complete buyouts under the BSH Program.

An area qualifying as a DRRA must meet the following requirements:

- Must have been impacted by a verifiable hazard (e.g., flooding, storm surge) directly caused by or exacerbated by the 2024 Hurricanes; or
- Addresses one or more of the current and future risks identified in the County's [Mitigation Needs Assessment](#); and
- The hazard or risk(s) must be supported by best available data (e.g., FEMA Repetitive Loss Data, National Risk Index) and science (e.g., engineering, studies, structural solutions put forth by FEMA, USACE or other Federal agencies).

The County will publish all designated DRRAs on its CDBG-DR website with clearly delineated boundaries.

## Damage Inspection

The property must have sustained damage attributable to one or more of the 2024 Hurricanes. Properties may be subject to field verification and documentation of storm-related impacts. Applicants may be required to provide:

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<sup>2</sup> FEMA defines Repetitive Loss properties as a structure that has at least two paid flood losses greater than \$1,000 each in any 10-year period since 1978.

- Insurance or FEMA inspection reports;
- Photographic evidence of damage; or
- Contractor estimates or repair invoices.

## Environmental Review

Every project undertaken with Federal funds, and all activities associated with such project, are subject to the provisions of the National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. § 4231 et seq., and 24 CFR § 58, which is HUD's regulation governing the Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities. This regulation states that grantees administering HUD funding must complete a thorough environmental review and document review findings before committing dollars to a project.

BSH staff will conduct an environmental review on every project, prior to issuing a program award to ensure that no choice limiting action has taken place and that the proposed activities do not negatively impact the surrounding environment and that the property itself will not have an adverse environmental or health effect on end users. Specifically, 24 CFR § 58.22 prohibits the commitment or expenditure of federal or non-federal funds on any activity that could have an adverse environmental impact or limit the choice of reasonable alternatives prior to completion of an environmental review.

The environmental review will assess impacts on natural and built environments and ensure compliance with other federal environmental laws, including but not limited to:

- Floodplain Management (24 CFR Part 55 (or any successor regulation) – Projects located in the 100- or 500-year floodplain will be subject to an 8-step or 5-step decision-making process to evaluate risk and mitigation measures.
- Historic Preservation (Section 106 of the National Historic Preservation Act) – Projects must be reviewed for potential impacts to historic properties or districts, in consultation with the Florida State Historic Preservation Officer (SHPO).
- Endangered Species Act & Coastal Zone Management Act – Where applicable, coordination with federal and state environmental agencies may be required.

Environmental clearance must be obtained for each project prior to the commitment of federal or non-federal funds. A violation of this requirement (i.e., a choice limiting action) may jeopardize Federal funding for the Program and disallow all costs that were incurred before completion of the environmental review.

24 CFR Part 58 requires identification and mitigation of all identified environmental hazards for overall program compliance. If a condition discovered during the environmental review

cannot be cleared within program award caps or schedule constraints, the property may be ineligible for assistance.

During the environmental review process, the program may determine that, due to extraordinary environmental conditions, the site is not feasible for buyout. In these cases, the property may be determined to be ineligible for assistance.

For additional information as it relates to the Environmental Review process, please refer to the County's standalone Environmental Review Policies and Procedures.







*Table 3 - Link to Manatee County Environmental Review Policy and Procedures Manual*

File Name	File Link
Manatee County Environmental Review Policy and Procedures Manual	TBD

## Duplication of Benefits

Awards must comply with federal DOB requirements under the Stafford Act, 44 CFR Part 206, the Revised Universal Notice, and HUD guidance. The County will carry out the actions identified in *Figure 2* when conducting a DOB analysis.

*Figure 2 - DOB Analysis Actions*

 Identify Total Need	 Identify Non-Duplicative Assistance
 Review Received and Available Funding	 Recover Excess Funds
 Calculate Unmet Needs	 Conduct Monitoring and Verification

## Pre-Disaster DOB Applicability

When a buyout offer for a property is developed based on pre-disaster FMV, the following should be evaluated to assist in preventing grant funding from duplicating benefits available through other sources:

- The County will review U.S. Small Business Administration (SBA) loan documentation, if applicable to the applicant. Property owners who have an SBA loan with a mortgage on the property that is to be acquired are required to repay the loan or roll it over to a new loan at closing.

- The County shall identify likely sources of benefits to the homeowner, or tenant.
- The County shall coordinate with Applicants who shall disclose all potential amounts available to them for the same purpose, as described above, including repair or replacement assistance received, all insurance benefits available to them under an existing policy (whether they submitted a claim or not), and any potential recovery based on litigation or other legal obligations.
- If DOB is identified, the County will subtract the DOB amount from the offer amount. Amounts that are reasonably available or anticipated to the Applicant shall be treated as benefits available for the same purpose, even if the property owner did not seek them.
- The County will coordinate with tenants who shall disclose any amounts received from rental or relocation assistance.

## Post-Disaster DOB Applicability

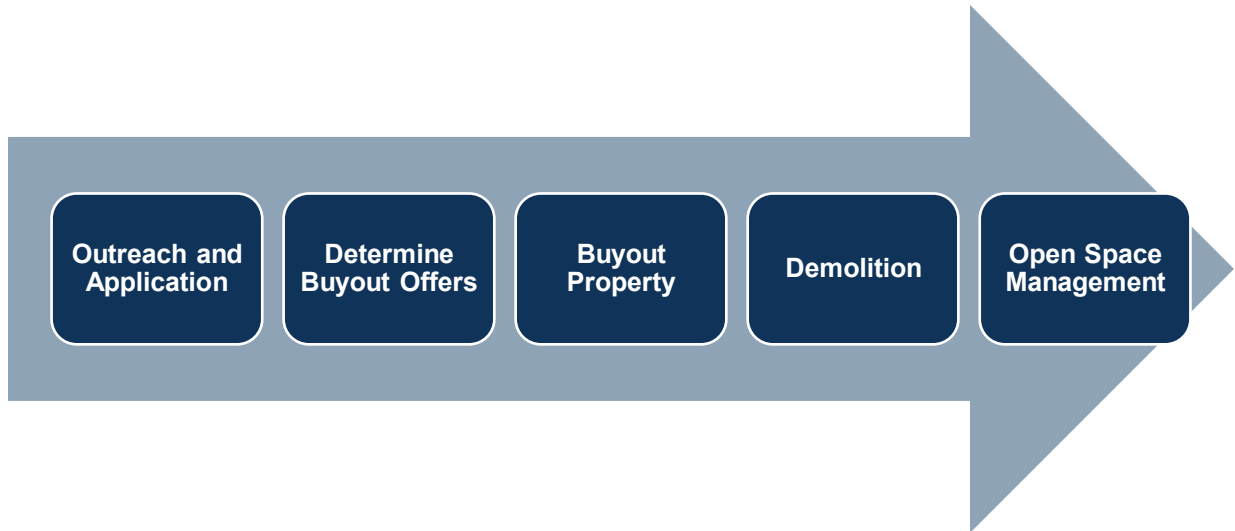
Post-disaster FMV awards are likely to reflect the current property condition and therefore may not require DOB deductions. County staff will determine DOB applicability based on the valuation method used. Program staff may document all insurance, FEMA, and SBA amounts.

All Applicants must sign a Subrogation Agreement to repay future duplicative assistance.

# Program Design and Process

The BSH Program lifecycle will consist of five general phases, beginning with outreach and application intake, and concluding with the long-term open space management phase. County staff will review all applications and supporting documentation to verify BSH Program eligibility. Once an application has been approved, the County will conduct a DOB check to determine whether the Applicant received assistance for the same purpose through another program.

Figure 3 – Program Lifecycle



## Phase I: Outreach and Application

- **Outreach:** The County will conduct outreach to homeowners in targeted locations to gauge interest in program participation. Preliminary information will be collected to identify interested parties.
- **Application Submissions:** The County will announce funding availability and will open the application process. The County will provide an online application portal to enable homeowners to efficiently file a complete application.
- **DOB Check:** Using information gathered during the application phase, the County will verify that interested homeowners did not obtain assistance from other programs for similar activities being conducted by the BSH Program.
- **Application Review:** The County will conduct a comprehensive review of all submitted applications to ensure that there are no information gaps that need further documentation or investigation. Application reviews will include, but are not limited to:
  - Property ownership verification;
  - Primary residency verification;
  - Determination whether home is owner-occupied;
  - Assess URA impacts;
  - Determination whether home was occupied by applicant prior to the 2024 Hurricanes;
  - Obtain hold harmless and right of entry forms; and
  - Verification of household size.

- **Eligibility Review:** This includes verification and calculation of household income, verification of ownership status, clear title, current on property taxes, determination of property location/eligibility, and determination of LMI status.
- **Application Technical Assistance:** Applicants will be required to complete program documentation with an Applicant Eligibility Specialist from the County. The Applicant Eligibility Specialist will assist homeowners with preparing complete applications and relocation services, as needed.

More detailed information can be found below to assist homeowners on understanding the documentation requirements for the program.

## Application and Intake Process

This section provides procedural guidance to County departments and staff responsible for implementing program activities. All actions must comply with the County’s Action Plan and applicable HUD guidance.

### Social Media

The County uses social media platforms to notify residents when applications for CDBG-DR housing activities are open and when public hearings related to CDBG-DR plans or projects are scheduled.

Information is published on the Lasting Manatee website, subscription-based email updates, and County’s official Facebook and X (formerly Twitter) accounts. Notifications may include announcements of program survey and application windows, critical deadlines, and updates on program milestones, such as home inspections, construction progress, and key turnovers.

### Application

The County will launch a formal application period for eligible homeowners to apply for assistance under the BSH Program. Applications will be accepted during a publicly announced intake window and will be accepted until program funds are exhausted. The County reserves the right to halt the acceptance of applications at any time. Application processing will be prioritized according to a phased structure detailed below:

*Table 4 – Application Phasing Criteria for BSH Applicants*

Application Phase	Phase I	Phase II	Phase III
Household Income of 50% of AMI and Below	✓		

<b>Household Income</b> between 51% and 80% of AMI		✓	
<b>Household Income</b> between 80% and 120% of AMI*			✓
<b>Home is a Repetitive Loss Property</b>	✓	✓	✓

All applications must include, but are not limited to:

- Proof of identity, property ownership, and primary residency at the time of the 2024 Hurricanes;
- Documentation verifying property location within an eligible zone (e.g., SFHA, repetitive loss);
- Household income verification;
- Documentation of disaster-related assistance received from FEMA, SBA, insurance providers, and other parties;
- Signed release forms and attestations.

### OWNERSHIP VERIFICATION

Applicants must have owned the storm impacted property at the time of the 2024 Hurricanes and still maintain ownership. One of the following must be submitted to verify ownership:

- Deed;
- Mortgage statement;
- State-Issued Certificate showing the Applicant as owner (MHUs only);
- Title (MHUs only);
- Bill of Sale showing Applicant name as owner (MHUs only);
- Legal Will that is undergoing/undergone probate; or
- Court order or judgement granting ownership of the property.

Other documents may be considered on a case-by-case basis

### MHU Ownership

Applicants applying for BSH Program assistance for an MHU must establish ownership at the time of the 2024 Hurricanes. Proof of ownership can be established via submission of one or more of the documents outlined above

If the Applicant was under a Lease Purchase Agreement for the property and/or MHU, the contract must be satisfied and a warranty deed granting the property to the Applicant must have been recorded in the property records prior to the 2024 Hurricanes. The original

contract and subsequent warranty deed are required. The BSH Program may also recognize other valid forms of MHU or property ownership, including copies of the aforementioned documents above if they are lost or damaged, provided they are legally enforceable and adequately documented, subject to County review.

## Trust

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If any portion of the storm-impacted property was transferred to the Applicant through a family trust by the previous owner, a copy of the recorded Trust document will meet the ownership requirement.

## Death of an Applicant

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If an Applicant becomes deceased after submitting a BSH Program application, but before the buyout is processed, their heir may still be eligible for assistance. According to 24 CFR 5.403 and 24 CFR 570.3, assistance under HUD CDBG-DR is awarded to households, not just individuals. Therefore, if the Applicant passes away, the application can continue with a surviving eligible household member or heir. This is only possible if the household remains income-qualified, meets ownership and occupancy requirements, and if the heir can temporarily secure the award until probate is completed, while also meeting all other eligibility criteria mentioned in these guidelines.

In the event of the death of an Applicant, the County shall carry out the following procedures to progress the BSH Program application and project:

- Confirm the death of the Applicant by obtaining official documentation and recording it in the project case file.
- If the Applicant dies before the award and contract are finalized, BSH Program staff must check the application status to decide on withdrawal or reassignment to the heir after verifying the heir's eligibility and ownership.
- If the Applicant passes after award, but before the buyout is processed, BSH Program staff must ensure compliance with BSH Program requirements for the project to proceed.
- Confirm the legal status of the surviving heirs before releasing any funds.
- Update all agreements to reflect any changes related to the Applicant's death.
- Keep documentation of decisions and project progress or termination for audit purposes.

If no eligible household member-heir has been identified, the application will be closed and deemed ineligible for assistance under the BSH Program.

## **PRIMARY RESIDENCE VERIFICATION**

Applicants must provide documentation that establishes that they occupied the storm-impacted property as their primary residence at the time of one of the 2024 Hurricanes. Documents included with the application must include the Applicant or Co-Applicant's name, the appropriate date demonstrating residence at the time of the 2024 Hurricanes, as well as the storm-impacted property address.

The following must be submitted to the County to satisfy primary residency requirements:

- 2024 property tax bill showing homestead exemption; or

Two (2) of the following:

- FEMA IA Award Letter with the storm-impacted property address for damages caused by 2024 Hurricanes
- SBA Disaster Home Loan award letter with the storm-impacted property address for damages caused by the 2024 Hurricanes
- Driver's license or state-issued ID card showing the storm-impacted property address; issued prior to the date of the 2024 Hurricanes
- Utility bill in the Applicant's name showing service to the storm-impacted property in the month preceding or the month of the one of the 2024 Hurricanes
- Credit card bill or bank statement sent to the Applicant at the storm-impacted property address in the month preceding or the month of one of the 2024 Hurricanes
- Insurance documentation indicating primary residence in 2024, such as a homeowner's policy endorsement
- Employer's statements, including pay stubs and similar employment documents (must be dated in the month preceding or month of one of the 2024 Hurricanes)

Other documents may be considered on a case by-case basis

BSH Program staff will review and assess all available documentation together and determine primary residence based on the Applicant's demonstration of consistency across the variety of documentation provided. If inconsistencies in documentation are identified, the application may not move forward in the eligibility process until the inconsistencies are resolved by the Applicant. All Applicants to the BSH Program bear the burden of proof for providing consistent evidence to prove primary residency at the time of the 2024 Hurricanes.

## **HOUSEHOLD INCOME VERIFICATION**

To demonstrate that the BSH Program meets its LMI National Objective target and to confirm that each Applicant receives only the assistance for which they are eligible, the County will

verify and document the annual income of every participating household. The verification process follows HUD's approved calculation methodologies, applies the most current Area Median Income (AMI) limits published by HUD, and establishes clear trigger points for recertification to keep data current through closing and final incentive disbursement.

Applicants must be LMI with a total household annual gross income that does not exceed 120 percent AMI, adjusted for family size, as published annually by HUD. Annual income is defined by HUD at 24 CFR 5.609. The Program will use the Internal Revenue Service (IRS) Form 1040 definition of income for the purpose of determining eligibility for the BSH Program.

The IRS Form 1040 method of calculating income is often referred to as the Adjusted Gross Income or AGI method. All household members included in the AGI calculation, if required to file, must provide a copy of their most recently filed tax return or tax return transcript, if available, for the AGI of the household to be calculated. The Program will allow the use of the most recently filed tax year's tax return in determining annual income for each adult household member and no other documentation will be required. Each adult household member is required to certify whether there will be any substantial changes in household income since the previous year's tax return and in the coming 12 months. If there have been significant changes to household income, the Program may require additional income documentation to calculate income.

Situations may occur where a household member may have had no obligation to file a return, has not yet filed it, or filed an extension. If any household member did not file a prior year income tax return, the household member is required to submit current documentation that reflects their current income. The following income documentation will be required for each household member only if the type of income is applicable and if a prior year income tax return is not available:

- **Wages:** Three (3) recent paystubs within the past three (3) months, W-2 Forms;
- **Retirement or Social Security:**
  - Current Social Security Benefits letter (including benefits paid to minors);
  - Past three (3) Monthly Bank Statements (Social Security Benefits & Pension only);
  - Current Pension/Retirement Benefit letter (if applicable), or prior year 1099 form; or
  - Current Annuity Payment letter (if applicable), or prior year 1099 form.
- **Self-Employment Income:** Most recent tax return (1040 or 1040A), W-2 Forms; and/or Current year profit and loss statement;
- **Unemployment Benefits:** Current benefit letter with gross benefit amount;

- **Court Ordered Alimony/Spousal Maintenance:** Copy of court order documentation;
- **Taxable Interest and Dividends (including amounts received by, or on behalf of minors);** 1099-INT or 1099-DIV;
- **No Income:** Adult household members who do not earn an income will be required to submit a Certification of No Income.

Applicants will receive status updates throughout the process. Those found to be ineligible will be notified of the reason for determination and provided with information on how to appeal.

## Phase II: Determine Buyout Offer

- **Environmental Review:** CDBG-DR buyout assistance is contingent on compliance with the National Environmental Policy Act (NEPA) and related environmental and historic preservation legislation and executive orders outlined at 24 CFR Part 58. The County will conduct an Environmental Review prior to the commitment of project funding.
- **Property Appraisal and Value Calculation:** The County will utilize a procured third-party vendor to conduct property appraisals on all selected properties. Properties will be determined at pre-disaster value for the land and structure.
- **Determine Safe Housing Incentives:** This program has been designed to allow for Safe Housing Incentives up to \$50,000 to relocate outside of a SFHA or any mapped high-risk flood zone. An Applicant Eligibility Specialist will coordinate with the homeowner to calculate their allowed incentive amount.
- **Buyout Offer Extended:** Once the property and Applicant have been deemed eligible, the Applicant will receive a buyout offer. All purchase offers will be calculated at pre-disaster FMV with any DOB subtracted. Any displaced Applicants will be offered information on available resources to assist in relocation.
- **Commitment:** The Applicant must accept the buyout offer to proceed.

## Award Determination and Funding Structure

Awards will vary depending on the timing of ownership, valuation method, and applicable deductions.

### Award Calculation Methodology

Buyout offers will be calculated as follows:

- For eligible Applicants, the award will be up to 100 percent of the property’s pre-disaster FMV, determined by a qualified appraisal using the most recent assessment prior to the 2024 Hurricanes.
- The maximum amount of assistance available per beneficiary shall not exceed \$450,000, inclusive of all eligible buyout costs and Safe Housing Incentive. However, in cases where justified by individual property valuation, household needs, or relocation considerations, assistance amounts may exceed \$450,000 with prior County approval.

All offers will be subject to a DOB review, and final offers will be adjusted accordingly.

## Safe Housing Assistance Determination

The County will offer a one-time Safe Housing Incentive to eligible Applicants who relocate outside of a SFHA or any mapped high-risk flood zone. Eligible Applicants receiving a Safe Housing Incentive are permitted to relocate outside of Manatee County. The incentive is designed to facilitate voluntary relocation, reduce displacement burdens, and promote housing stability following the disaster.

The table below summarizes the Safe Housing Incentive.

*Table 5 – Safe Housing Incentive Overview*

Item	Safe Housing Incentive Standard
Eligible Applicants	Owner occupants who complete a voluntary buyout under this program and relocate outside the SFHA or any mapped high-risk flood zone to a property that will be their primary residence within 12 months of closing.
Maximum Assistance	Up to \$50,000, but not more than the gap needed to meet the affordability test below.
Affordability Test	Monthly post-move total housing cost greater than or equal to 35 percent of gross monthly income (Principal, Interest, Taxes, and Insurance (PITI)). Incentive fills the gap between 35 percent threshold and actual cost, up to the \$50,000 cap.
Form of Assistance	Forgivable grant; zero (percent interest, zero (0) years repayment if recipient maintains primary residence for at least five (5) years. If the property is sold, rented, or is no longer the applicant’s primary residence, repayment will be due on pro-rated basis.

Duplication of Benefits (DOB)	Unspent insurance/FEMA/SBA funds for structural loss are first deducted from the purchase price. Any remaining duplicative funds are then deducted (or later recaptured) from the Safe Housing Incentive.
Disbursement Timing	Lump-sum wire to closing agent at closing of new property.
Required Documentation	<ul style="list-style-type: none"> <li>• Proof new home satisfies safe location standard (FIRMetts or elevation cert.)</li> <li>• Closing Disclosure</li> <li>• Post-move utility bill or homestead exemption filing</li> <li>• Signed Subrogation Agreement</li> </ul>
National Objectives	<ul style="list-style-type: none"> <li>• LMI Safe Housing Incentive (LMHI)</li> <li>• Urgent Need (UN)</li> </ul>
Monitoring	Compliance check annually to confirm continued primary occupancy and low-risk location; release of lien after year five (5).

## Safe Housing Incentive

The Safe Housing Incentive (SHI) aims to address this critical need by offering a comprehensive and voluntary buyout program designed to assist Applicant who choose to transition from their current homes to housing outside of the SFHA or mapped high-risk flood zone.

Recognizing that many residents may encounter financial barriers when purchasing a new home, the Program provides a financial incentive of up to \$50,000 to bridge the affordability gap between the Applicant’s current residence and their prospective home, ensuring that the homeownership venture is not only achievable but also sustainable.

### Goals

- Provide a financial incentive to Applicant voluntarily participating in the buyout program to bridge the affordability gap when purchasing a new home.
- Ensure compliance with HUD regulations and URA requirements.
- Facilitate a seamless transition from existing to new residence for eligible participants.

### Eligible Participants

- Applicants who voluntarily opt into and have their existing residence purchased through the buyout program.

- LMI households facing an affordability gap when securing new housing.

## **Key Components**

- Offer an incentive of up to \$50,000 to eligible Applicants, calculated based on the affordability gap between their current home and the new home being purchased.
- Applicants must secure their own private funding to purchase the new home if the buyout amount plus incentive payment are insufficient to cover the cost of the new residence.
- The new home being purchased must be valued at more than the home being purchased by the buyout program.
- The new home must be located outside of a SFHA or mapped high-risk flood zone.

## **Education and Counseling Services**

The County will maintain a directory of resources for Applicants, which may include, but not be limited to, housing counseling and workshops on homeownership, financial literacy, and navigating the home-buying process.

## **Incentive Timeline and Duration**

- The incentive must be utilized during the home-buying process and enable Applicants to access funds when they secure their new home.
- Applicants must complete their new purchase within 12 months of the closing on the buyout property. The County will consider extensions on a case-by-case basis.

## **Compliance and Monitoring**

- Ensure all program components comply with HUD regulations, including income eligibility, housing quality standards,<sup>3</sup> and fair housing laws.
- Conduct annual monitoring to ensure that the homeowners have remained in the residence during the five (5) year-term.

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<sup>3</sup> Source: [§5.703 National standards for the condition of HUD housing](#). US Code of Federal Regulations. 24 CFR 5.703. 2025.

# Award Determination Examples

Table 6 – Buyout Award Examples

Example	Inputs	DOB Deduction	Final Payout
Unspent Insurance + No SHI	<ul style="list-style-type: none"> <li>Pre-Disaster FMV: <b>\$250,000</b></li> <li>Insurance Received: <b>\$50,000</b> (Unspent)</li> </ul>	DOB: <b>\$50,000</b>	<ul style="list-style-type: none"> <li>Purchase Price: <b>\$250,000</b></li> <li>Less DOB: <b>\$50,000</b></li> <li>Total Award (Buyout): <b>\$200,000</b> paid at closing</li> </ul>
Insurance Partly Spent + SHI	<ul style="list-style-type: none"> <li>Pre-Disaster FMV: <b>\$300,000</b></li> <li>Insurance Received: <b>\$50,000</b></li> <li>Insurance Remaining: <b>\$15,000</b></li> <li>Eligible SHI Amount: <b>\$25,000</b></li> </ul>	DOB: <b>\$15,000</b> (Remaining Insurance)	<ul style="list-style-type: none"> <li>Purchase Price: <b>\$300,000</b></li> <li>Less DOB: <b>\$15,000</b></li> <li>Buyout Amount: <b>\$285,000</b> paid at closing</li> <li>SHI: <b>\$25,000</b> paid at closing</li> <li>Total Award (Buyout + SHI): <b>\$310,000</b></li> </ul>
FMV Exceeds Maximum Award + No DOB + No SHI	<ul style="list-style-type: none"> <li>Pre-Disaster FMV: <b>\$500,000</b></li> </ul>	N/A	<ul style="list-style-type: none"> <li>Purchase Price: <b>\$450,000</b></li> <li>Total Award (Buyout): <b>\$450,000</b></li> </ul>

## Phase III: Property Buyout

- Closing Documentation Approval:** Prior to closing, the County will review and approve all documentation related to the property purchase. Such documentation will include, but is not limited to:
  - Contract
  - Restrictive Covenant
  - Legal Notices for demolition
  - Title searches
  - Title insurance
- Property Transfer:** Following closing, title to the property will be transferred to the County and will become the property owner.

## Phase IV: Clearance and Demolition

- **Procurement:** The County will procure a contractor to demolish all acquired homes, clear the site, and obtain all necessary permits.
- **Compliance:** Prior to any demolition occurring:
  - The contractor will take photographs of all properties for the project file; and
  - The County will conduct an onsite visit/inspection of each property.

Following the completion of demolition, the contractor will submit photographs and the final request for payment.

## Phase V: Open Space Management

- **Land Management:** Acquired properties will be maintained by an appropriate County Department. While the County intends to maintain the open space as greenspace, other allowable uses (such as stormwater management or passive recreation) may be considered if included and approved in the EA and if funding becomes available.

# Relocation and Anti-Displacement

## Uniform Relocation Act Policy

All BSH Program activities will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), as applicable. URA regulations are found at 24 CFR Part 42 and cross-reference the DOT regulations at 49 CFR 24 which serve as the basis for HUD's requirements. An additional reference for the County will be HUD Handbook [1378.0 - Tenant Assistance, Relocation and Real Property Acquisition](#), which provides detailed instructions to HUD grantees on URA implementation.

Key program policies include:

- The BSH Program is a voluntary acquisition program, and homeowners cannot be forced to participate. Applicants will receive a Voluntary Participation Notice before any negotiation begins.
- Voluntary participants are not eligible for the standard URA relocation entitlements. However, eligible applicants may receive optional assistance through the Program's relocation benefits, including Safe Housing Incentives and reasonable moving costs.

- In rare cases where condemnation or eminent domain is required (e.g., to preserve community resilience), the full spectrum of URA protections will apply and participants will be considered displaced persons under the HUD and DOT rules.

The County will maintain URA compliance documentation and issue appropriate notices and acknowledgments to all applicants based on their program status. The County may opt to retain a contractor to assist with implementation of the URA requirements.

## Open Space Restrictions

All properties acquired through the BSH Program will be permanently restricted to non-residential, open space uses that align with HUD requirements, as outlined in HUD's Revised Universal Notice, for flood mitigation and hazard risk reduction.

- Properties will be recorded with a deed restriction or similar covenant at the time of closing.
- Permitted uses include:
  - Stormwater management;
  - Passive recreation (e.g., trails, parks);
  - Green infrastructure;
  - Wetlands or floodplain restoration;
  - Natural habitat protection or reforestation;
- No residential, commercial, or industrial structures may be constructed on the property in perpetuity. The only permissible structures will be those incidental to the use of property (e.g., open sided pavilions, restrooms, etc.)
- The County will ensure post-buyout use compliance through property inspections, monitoring, and legal enforcement as necessary.

## Buyout Program Nuances

### Negative Equity

While the BSH program may assist Applicants with a mortgage balance greater than the pre-disaster FMV, buyout amounts are capped at the pre-disaster FMV determined during the appraisal process. Should the Applicant's mortgage balance exceed the pre-disaster FMV, the Applicant may be required to cover the difference for the buyout to proceed. To achieve BSH Program goals, assistance will only be provided if it allows the household to move from the

damaged home to an area of reduced flood risk. Each negative equity case will be reviewed by the County on a case-by-case basis.

## Reverse Mortgages

While the BSH Program may assist Applicants with a reverse mortgage, buyout amounts are capped at the pre-disaster FMV. Assistance will only be provided if it will allow the household to pay off the reverse mortgage and move from the damaged home to an area of reduced flood risk. Each reverse mortgage case will be reviewed by the County on a case-by-case basis.

## Homeowners in Foreclosure

Applicants in foreclosure may be provided with buyout assistance; however, buyout amounts are capped at the pre-disaster FMV. Assistance will only be provided if the lender will enable the Applicant to pay off the mortgage and move from the damaged home to an area of reduced flood risk. The County will review foreclosure cases on a case-by-case basis. Given the lender's interest in the property, the buyout may not be feasible. As an extension of this concept, the County may engage in purchasing real estate owned (REO) by financial institutions pursuant to foreclosure actions if an REO property is in a strategic buyout area.

## Land Leases and Mobile Homes

In some cases, the ownership of the land and the dwelling are separate, such as when a mobile home is located on leased land. Generally, the BSH Program can only provide assistance when the Applicant owns both the land and the dwelling. If the Applicant owns only the dwelling and not the land, program assistance may be considered only if the leasehold interest can be converted into full ownership of the underlying property prior to the buyout. These circumstances will require additional review and will be evaluated by the County on a case-by-case basis to determine eligibility and next steps.

## Applicant Responsibilities

All Applicants must agree to the following prior to receiving assistance from the program:

- Sign an Authorization for the Release of Information so that information provided can be shared and/or verified with state, federal and other third-party agencies. The Applicant, co-owner, and other adult household members will be required to sign the release unless the individual has a power of attorney in place.

- Sign a Certification of Accuracy attesting to the accuracy and completeness of all information provided to the County.
- Agrees to the verification of ownership.
- Applicants may grant power of attorney to someone who can apply on their behalf.
- All signed documents will include the following statement:

*Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729.*

Applicants must remove all personal property from the home no later than one (1) calendar day prior to the day of closing. Any personal property remaining after closing will not be recoverable and will be included in the demolition and clearance process.

Following delivery of the County's purchase offer, the Applicant will be notified of relocation resources and moving resources that are universally available to all program participants.

Upon Applicant acceptance of the County's offer:

- The County will send information to the Title company, requests title commitment, and invoice; and
- The County will coordinate closing and demolition.

## Closing Documentation

The following documents will be signed by the Applicant and any co-owners at the time of closing:

- Agreement for Sale
- Subrogation Agreement
- Promissory Agreement – if a Safe Housing Incentive is provided in addition to the buyout payment
- Agreement to have all utilities disconnected within 10 business days with the Applicant paying utility for charges post-settlement until shutoff.

## Subrogation Agreement

Subrogation is the legal basis by which duplicative assistance paid to the Applicant after receiving an award is owed and remitted to the County to rectify a DOB. All applicable claims (including insurance payments, unpaid claims, lawsuits, and settlements) paid to Applicant not included in the original benefit determination calculation and/or received after closing, must be subrogated to the County to prevent a DOB.

# Closeout

Projects will be closed upon either the closing of the buyout property (when no Safe Housing Incentive is provided) or the closing of the property purchased with Safe Housing Incentive assistance. BSH will perform a complete review of the application file to ensure all necessary documentation is present and to ensure that the case is ready for closeout. By the time a case reaches closeout, the case has undergone several quality control checkpoints and various approvals at specific stages. Because the case has undergone extensive quality control throughout each stage of the program process, closeout review is intended to provide a completeness review of each individual application, rather than a comprehensive quality control review of each step. When all quality control review levels have been approved, the Applicant will be sent a Final Notice from the Program, informing them that the case has been closed and reminding the Applicant of compliance period requirements.

# Fraud, Waste and Abuse

The County, as the grantee, is committed to the responsible management of CDBG-DR funds and has developed a comprehensive policy for preventing, detecting, reporting, and rectifying fraud, waste, abuse, or mismanagement. This policy has been reviewed and accepted by HUD as providing an effective approach to preventing fraud, waste, and abuse. See Manatee County's [\*Procedures to Detect Fraud, Waste, and Abuse\*](#) for more information.

## Reporting Fraud

Any allegations of fraud, waste, abuse, or mismanagement related to CDBG-DR funds or resources are most appropriately reported to the County's CDBG-DR Compliance Officer, the County's Division of Inspector General, or the State Attorney's Office. Allegations may also be referred directly to the Office of the Inspector General (OIG) at HUD, or any local or federal law enforcement agency. For additional details outlining the guidelines and procedures pertaining to fraud, waste, and abuse, refer to the County's *CDBG-DR Anti-Fraud, Waste, and Abuse Policy*.

Contact methods and information for reporting suspected fraud, waste, abuse, or mismanagement of CDBG-DR funds or resources are included in *Tables 7 and 8* below.

*Table 7 – Manatee County CDBG-DR Compliance Officer Contact Information*

### **Manatee County CDBG-DR Compliance Officer**

Phone Number	(941) 742-4787
Web Form	<a href="https://www.lastingmanatee.org/pages/contact">https://www.lastingmanatee.org/pages/contact</a>
Email	<a href="mailto:info@lastingmanatee.org">info@lastingmanatee.org</a>

Allegations of fraud, waste or abuse can also be reported directly to the OIG by any of the following means:

*Table 8 – HUD Office of Inspector General Contact Information*

**HUD Office of Inspector General (OIG)**

Phone Number	1-800-347-3735 (Toll-Free) 1-787-766-5868 (Spanish)
Web Form	<a href="https://www.hudoig.gov/hotline/report-fraud">https://www.hudoig.gov/hotline/report-fraud</a>
Email	<a href="mailto:HOTLINE@hudoig.gov">HOTLINE@hudoig.gov</a>
Postal Mail	HUD Office of Inspector General (OIG) Hotline 451 7th Street SW Washington, D.C. 20410

## Complaints

Applicants may submit a complaint to the Program at any time. In accordance with HUD requirements, including the Revised Universal Notice and the County’s Citizen Participation Plan (CPP), BSH Program will provide a timely written response to every written citizen complaint. Complaints will be addressed within 15 working days of receipt when practicable. If a complaint cannot be addressed within 15 working days, BSH Program will notify the complainant of the need for additional time and an estimated resolution/response timeframe.

Persons who wish to submit formal written complaints related to the BSH Program may do so through the following:

Manatee County, Government Relations  
 Attn: Lasting Manatee  
 1112 Manatee Avenue West  
 Bradenton, FL 34205  
 Telephone: (941) 742-4787  
 Email: [info@lastingmanatee.org](mailto:info@lastingmanatee.org)

Although formal complaints must be submitted in writing, BSH Program may also accept complaints verbally or by alternative means when necessary to provide access, such as for individuals with disabilities, limited English proficiency, or other circumstances preventing submission in writing. In such cases, staff will document the complaint in writing on behalf of the complainant to ensure it is included in the official record.

## Appeals

Applicants who wish to contest a BSH Program determination may request an initial appeal directly with the BSH Program by submitting a written request via electronic or postal mail within 30 calendar days from the date of the determination being contested. Applicants may request an appeal to contest:

- Eligibility determinations;
- Valuation assessments;
- Benefit calculations;
- Denial of Safe Housing Incentive; or
- Recapture Amount.

Applicants who wish to request an initial appeal may do so through any of the following avenues:

- Via the web portal at: TBD
- Via Email: [info@lastingmanatee.org](mailto:info@lastingmanatee.org)
- In Writing:
  - Manatee County, Government Relations
  - Attn: Lasting Manatee
  - 1112 Manatee Avenue West
  - Bradenton, FL 34205

The BSH Program Appeals Coordinator will conduct an initial review using the request and supporting information submitted by the Applicant and make a determination. When practicable, the determination will be made within 15 business days. Applicants will be notified in writing of the determination made on their initial appeal via an Initial Appeal Determination Notification.

# Program Exceptions

This Program Guide is intended to guide program activities and enforce compliance with applicable regulations. While this Program Guide governs the BSH Program, it should not be considered exhaustive instructions for every potential scenario that may be encountered. At times, exceptions to program policies and/or procedures may be warranted. All exception requests are reviewed on a case-by-case basis at the sole discretion of the County. Exceptions may be granted to program policy or processes; however, exceptions to federal regulations, laws, or statutes may not be authorized.

## Labor Standards (Davis-Bacon)

Regulatory Citation: 29 CFR Part 5

In most situations, Davis-Bacon will not be triggered for buyout activities. However, according to 88 FR 57526 (“Final Rule”), demolition activities are subject to Davis-Bacon if future construction that will be subject to Davis-Bacon is contemplated at the location where the demolition occurs—either because the demolition is part of a contract for such construction or because such construction is contemplated as part of a future contract. In the event that a buyout project includes construction-based activities that trigger Davis Bacon, the County will follow the steps outlined in the *Manatee County Labor Standards Compliance Policy Manual*.

Table 9 – Link to Manatee County Labor Standards Compliance Policy Manual

File Name	File Link
Manatee County Labor Standards Compliance Policy Manual	TBD

## Uniform Relocation Assistance and Real Property Acquisition Act (URA)

As a HUD-assisted program, and in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), 42 U.S.C. § 4601 et seq., and the government wide implementing regulations found at 49 C.F.R. part 24, all Manatee County CDBG-DR programs, including the BSH Program, are subject to URA regulations.

Applicants voluntarily participating in the BSH Program are not considered displaced persons, and as such, are not entitled to relocation assistance benefits under URA. However, lawful tenants of program-assisted properties who must relocate due to program-sponsored buyout activities may be considered displaced persons by URA regulations and may be eligible for URA relocation assistance benefits.

*Table 10 – Link to Manatee County URA and Relocation Policy Manual*

<b>File Name</b>	<b>File Link</b>
Manatee County URA and Relocation Policy	TBD

## **Administrative Policies**

As a recipient of CDBG-DR funds, there are several policies, procedures, and regulations which apply to all programs, projects, and initiatives undertaken as part of the County's CDBG-DR programs. These policies and procedures are outlined on the County's CDBG-DR website at [www.lastingmanatee.org](http://www.lastingmanatee.org). These policies and procedures cover topics such as: procurement, financial management, fair housing, conflicts of interest, recordkeeping, and others. The requirements apply to all programs outlined in the County's CDBG-DR Action Plan and any amendments thereto.