

Manatee County, Florida

# Rental Recovery Program Guide

Hurricanes Debby, Helene, and Milton



# Change Log

Version	Date	Description
1	3/16/2026	Rental Recovery 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 Community Development Block Grant Disaster Recovery (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 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 Rental Recovery Program (RRP). The guide serves County staff, Property Owners (“Applicants”), and other interested 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 RRP. Each of the other recovery programs outlined in the County’s Action Plan are governed by its own Program Guide.

# Program Overview

## Purpose and Objective

The County has allocated \$20,000,000 of its total CDBG-DR award to create the RRP to address the rental housing recovery needs of the County after the 2024 Hurricanes. While primarily targeting privately-owned rental properties, the RRP will also offer assistance to the Manatee County Housing Authority (MCHA) and Housing Authority of the City of Bradenton

(HACB). This program is designed to ensure that the rental housing needs of low- and moderate-income (LMI) households, are addressed to the greatest extent feasible. To this end, the program will address disaster-related damages and unrelated improvements to bring properties up to decent, safe, and sanitary conditions, if needed.

Funding allocated for this program will be used to address rental properties with seven (7) or fewer units that were damaged by the 2024 Hurricanes. All rehabilitated, reconstructed, or elevated housing units should include disaster resilience measures to promote better outcomes during extreme weather events. Activities funded by this program include, but are not limited to:

- Rehabilitating existing structures, including substantial rehabilitation to bring the property to local codes and standards;
- Reconstructing seriously damaged or destroyed units;
- Replacement of mobile and manufactured housing units (MHU) or similar units; and
- Demolishing and re-building a unit in a similar manner, including elevation of homes that have been substantially damaged and are located in Special Flood Hazard Areas (SFHAs).<sup>1</sup>

For this program, the County will be the Responsible Entity and will carry out the environmental review process under 24 CFR 58.

To empower Applicants with greater flexibility in the contractor selection process, the County will provide each Applicant with a list of vetted contractors. This list will feature professionals who have undergone thorough evaluation and meet the County's quality standards. Applicants will have the opportunity to choose from this list of contractors, ensuring they can make informed decisions that best suit their needs and preferences.

## National Objective

All activities funded under the RRP 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 Objective for the RRP is:

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

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<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 RRP, the County will use the term SFHA.

To meet the LMH National Objective, Applicants served by the RRP must lease all assisted units in the property at a rent affordable to a tenant with a total household annual gross income that does not exceed 80 percent of Area Median Income (AMI) for Manatee County, adjusted for family size, as published annually by HUD. Therefore, tenant households are considered the beneficiaries for the RRP.

## Award Caps

The maximum award per eligible unit is \$250,000 for rehabilitation, and up to \$425,000 for reconstruction and/or elevation. The maximum award per Public Housing Authority (PHA) is \$1,000,000.

All costs associated with construction, reasonable accommodations, environmental mitigation/abatement, historic preservation, site specific costs, essential appliances, and code compliance/permitting are included in the award caps above. These caps reflect the point at which it becomes more cost-effective and sustainable to rebuild rather than repair, while ensuring awards remain reasonable for code-compliant housing.

Additional award guidelines for MHUs are as follows:

- MHU Rehabilitation:
  - Estimated cost to repair the unit is less than \$25,000;
  - Unit is fewer than five (5) years old; and
  - Is not located within a floodplain or SFHA.
- MHU Replacement:
  - Estimated cost to repair the unit is greater than or equal to \$25,000 or the unit is more than five (5) years old; and
  - Is not located within a floodplain or SFHA.
- MHU to Permanent Replacement:
  - Estimated cost to repair the unit is greater than or equal to \$25,000 or the unit is greater than or equal to five (5) years old; and
    - Units require elevation greater than five (5)-feet.

# 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.

## Intake Application

Applications submitted by Property Owners of rental units will be reviewed in the order in which they are received. Applications may be submitted by MCHA and HACB at any time and will receive priority consideration. Application approval and associated funding decisions will be made through evaluation of the program application and subject to funding availability.

Applications may be submitted via the following methods:

- Completing a pre-application on the [www.lastingmanatee.org](http://www.lastingmanatee.org) website.
- Completing a pre-application during County-hosted intake sessions held throughout Manatee County.
- For those that are unable to complete an electronic application or need a reasonable accommodation, contact Lasting Manatee at:
- Manatee County's website: [www.lastingmanatee.org](http://www.lastingmanatee.org)
- Email: [info@lastingmanatee.org](mailto:info@lastingmanatee.org)
- Telephone at: (941) 742-4787

Applicants will be required to complete an intake application and provide supporting documents necessary for eligibility and duplication of benefits review. All documentation submitted by the Applicant must be valid at the time of submission. The application process will require each Applicant to authorize RRP to obtain third-party data by signing a Consent and Release of Information Form. Applicant Eligibility Specialists will collect documents needed to determine eligibility and identify the program benefits to which the Applicant may be eligible.

Applicant Eligibility Specialists will be available by phone and via email to assist the Applicant through the intake process and to answer questions, as needed. For those that are unable

to complete an electronic application or need a reasonable accommodation, contact Lasting Manatee via the contact methods identified above..

Following application submission, Applicants will be assigned an Applicant Eligibility Specialist who can be contacted throughout all phases of the program via direct email and phone. Alternatively, the Applicant may contact a program representative by using the general contact information outlined below.

Multiple standard methods of communication will be provided to ensure that Applicants receive timely, accurate information regarding their applications and the program. Methods of communication with the Program include, but are not limited to:

- Manatee County's website: [www.lastingmanatee.org](http://www.lastingmanatee.org)
- Email: [info@lastingmanatee.org](mailto:info@lastingmanatee.org)
- Telephone at: (941) 742-4787; and
- Mail correspondence to:  
Manatee County, Government Relations  
Attn: Lasting Manatee  
1112 Manatee Avenue West Bradenton, FL 34205

The County will establish a deadline for application submission. The County may adjust the intake period at its discretion to accommodate program needs and will post deadlines online.

## Applicant Identification

Applicants and tenants aged 18 or older (if the storm-impacted unit is occupied at the time of application) will be required to submit a valid photo identification. Expired photo identification will not be accepted. Forms of identification accepted by RRP are:

- Government Issued Photo Identification (Federal or State issued);
- Non-Temporary Driver's License;
- Passport;
- Military ID Card; or
- Certificate of Naturalization or Permanent Resident Card.

Tenant household members under the age of 18 must submit proof of age and identity. Birth certificates must be submitted for all tenant household members aged 17 and under. If a tenant is unable to produce a birth certificate for a minor child, other documents may be considered, on a case-by-case basis.

## Applicant Designees

Applicants may choose to designate other individuals to act on their behalf or to receive information about the application and application process. Applicants may designate a Power of Attorney, Co-Applicant, Communication Designee, or any combination thereof. The requirements for, and powers of, each designated representative type vary and are outlined below:

- **Power of Attorney (POA):** For purposes of this program, a POA is a document that designates someone as legally authorized to act on behalf of the Applicant. The authority conferred by a POA varies, based on the language of the document but must encompass decision-making related to the RRP. The RRP will not aid Applicants in designating or securing a POA but will recognize a notarized, validly executed, legally sufficient POA submitted by, or on behalf of, the Applicant.
- **Co-Applicant:** A Co-Applicant must be an adult co-owner of the storm-impacted property. Co-Applicants will have the same authority over the RRP application as the Applicant; however, the County will not intervene if there is a dispute between the Applicant and Co-Applicant. If a Co-Applicant is designated by the Applicant, the Co-Applicant must sign all program documents with the Applicant. Applicants are not required to designate a Co-Applicant, regardless of whether the storm-impacted property is owned jointly, however, any individuals with ownership interest in the property must sign the Property Owner Grant Agreement.
- **Communication Designee:** A Communication Designee may be any adult whom the Applicant wishes to designate as an authorized person to receive information about the Applicant's RRP application. The RRP shall be authorized to share information with the Communication Designee but differs from a POA in that the Communication Designee is not authorized to make any decisions regarding the RRP application or affect the RRP application on the Applicant's behalf. A valid POA can also serve as a Communication Designee simultaneously, allowing for both communication and decision-making.

Any of the aforementioned persons, if duly appointed by the Applicant, may serve as the Applicant's representative in attendance of program inspections, should the Applicant be unable or unwilling to attend. However, only a POA may sign documents, make agreements or decisions, or otherwise act unilaterally on behalf of an Applicant.

## Required Applicant Certifications

RRP Applicants must sign an Acknowledgement and Consent statement. The Acknowledgement and Consent statement will include the certifications, acknowledgements, and authorizations outlined in *Table 1*.

Table 1 – Applicant Certifications Collected at Intake

Certification	General Description
Consent and Release of Information	Authorization from the Applicant to share and receive personal information, including information received from third parties, for purposes of determining eligibility through the RRP.
Right of Entry	Authorization from the Applicant for the program to access the storm-impacted property throughout the life of the application. <sup>2</sup>
Certification of Truthfulness	Applicant affirmation that all information provided in the application is accurate.
Verification of Disability (if applicable)	Tenant attestation of physical disability.
Subrogation Agreement	Applicant affirmation that any funds received for the same purpose as funds provided under the RRP, after provision of assistance through the RRP, must be returned to Manatee County.
Construction Stop Work	Applicant agreement to stop all construction work at the storm-impacted property and take no choice limiting actions after the submission of program application.
Uniform Relocation Act Compliance	Manatee County will comply with the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).
General Information Notice (GIN)	Informs affected individuals of the project and that they may be displaced by the project.
Conflict of Interest Disclosure	Applicant’s report of relationship with any public servant, employee, agent, consultant, officer, or elected official or appointed official of Manatee County, or of any designated public agencies, or of subrecipients that are receiving funds under the CDBG-DR Program (collectively, “Public Servant”) and the nature of said relationship. Applicants who do not have a relationship with Public Servants must report that no such relationship exists.

<sup>2</sup> To the greatest extent feasible, the County will strive to provide at least 24 hours’ notice before entering a property.

## Income

While Applicants do not need to be LMI to participate in the RRP, all RRP-assisted rental units must be leased to LMI persons or households at affordable rental rates. Affordable rents are determined by the program considering the following factors:

Area Median Income (AMI): Rents are based on a percentage of AMI, 80 percent or lower, adjusted for household size and unit bedroom count. [HUD publishes annual AMI data](#) for each region.

HOME Rent Limits: These limits ensure that rent does not exceed 30 percent of the adjusted income of a household earning 65 percent of AMI. Adjustments are made for unit size.

Annual Updates: Rent limits are updated annually by HUD and must be followed throughout the affordability period.

### Example:

If the AMI for a region is \$60,000, then:

65 percent of AMI = \$39,000

Affordable Rent = 30 percent of \$39,000 divided by 12 months = \$975/month

## Income Verification

To meet the income requirements for the RRP, tenants of program-assisted rental units must be LMI with a total household annual gross income (AGI) at or below 80 percent of AMI, adjusted for family size, as published annually by HUD. The RRP will require that Applicants verify tenant income annually using the Internal Revenue Service (IRS) Form 1040 definition of income for the purpose of determining tenant eligibility. **It is the responsibility of the Applicant to obtain all required income documentation, verify tenant household income, and submit all documentation and the completed income verification to the County annually and/or when the unit(s) is leased to a new tenant(s).**

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 RRP 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

or will be significant changes to household income, the RRP may require additional income documentation.

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 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(s) (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), 1099, 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.

## Household Size

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A household is defined under 24 CFR 570.3, as all persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a “single family” (as defined by 24 CFR 5.403), two or more families living together, or any other group of related or unrelated persons who share living arrangements. Household members are all persons (including minors and adults) who reside in the damaged home.

# Eligibility Requirements

Applicants will be required to provide complete and accurate information regarding their ownership, tenancy status, and capacity to meet other eligibility criteria. Failure to disclose

accurate and complete information (including failure to provide necessary documentation) may result in the Applicant being deemed ineligible for RRP assistance. If an Applicant that receives RRP assistance is subsequently found to have submitted inaccurate and/or incomplete information, they may be required to make full restitution to the County, including administrative fees, construction costs, and other costs.

Listed below are the threshold eligibility requirements for Applicants to be eligible for assistance. Threshold requirements are those that will either allow an Applicant to continue to move forward in the program or result in disqualification. Applicants should be aware that being deemed eligible does not guarantee that assistance will be provided, as RRP is subject to limited funding. All Applicants must demonstrate compliance with all eligibility criteria, including the following:

- Applicant must not be in bankruptcy or foreclosure.
- The property must be located within Manatee County, Florida.
- The property must have sustained damage from the 2024 Hurricanes and still has damage.
- Applicant must have been the owner of the property at the time of the 2024 Hurricanes and still maintains ownership.
- The assisted-property must be used as a long-term rental (i.e., leases are 12 months or longer).
  - Second homes and/or vacation rental style properties (e.g., AirBnB, VRBO) are not eligible.
- The property cannot be located in a [regulatory floodway](#).
- The property must be an eligible structure type.
  - If the property is part of a multi-unit structure (e.g., duplex), the Applicant must own the entire structure.
- The Applicant must be current on their property taxes or on a payment plan in good standing.
- If there is a mortgage on the property, the mortgage must be in good standing.
- No current code enforcement or law enforcement complaints against the property and/or Applicant.
- LMI tenants must be identified 30 days prior to commencement of work.
  - Tenants cannot have a familial relationship with the Applicant.
- Applicants must be able to demonstrate compliance with the Federal requirement to obtain and maintain flood insurance (where required), if unit previously received Federal disaster assistance.

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.

## Applicant Criteria

Eligibility will be determined by RRP staff based on the review of information and documents supplied by the Applicant and verified independently by the program.

Table 2 outlines Applicant eligibility criteria, along with required documentation to be verified by the RRP.

*Table 2 – Accepted Method(s) of Verification of Eligibility Criteria for Applicants*

Eligibility Criterion	Document(s) Required
Must have owned the storm impacted property at the time of 2024 Hurricanes and still maintains ownership	One (1) of the following: <ul style="list-style-type: none"> <li>• Deed</li> <li>• Mortgage statement</li> <li>• State-Issued Certificate showing the Applicant as owner (MHUs only)</li> <li>• Title (MHUs only)</li> <li>• Bill of Sale showing Applicant name as owner (MHUs only)</li> <li>• Legal Will that is undergoing/undergone probate</li> <li>• Court order or judgement granting ownership of the property</li> <li>• Other documents may be considered on a case-by-case basis</li> </ul>
Property is located in Manatee County, Florida	<ul style="list-style-type: none"> <li>• Verified by the County using storm-impacted property address and GIS mapping, if needed</li> </ul>
The storm-impacted property must be an eligible structure type	Verified by the County via a Damage Assessment; OR If it is impossible to verify structure type via a program damage assessment, such as in cases where the storm impacted property has been demolished, the Applicant may be required to provide proof of storm damage, which may include: <ul style="list-style-type: none"> <li>• Pre-storm information on structure type from the County Property Appraiser’s office;</li> </ul>

	<ul style="list-style-type: none"> <li>• Date-stamped, color photos of the storm impacted property address; or</li> <li>• Other document considered on a case-by-case basis</li> </ul>
Property taxes current	<ul style="list-style-type: none"> <li>• Proof from the County Tax Collector's office of property taxes paid in full at the time of application; or</li> <li>• Proof of a payment plan in good standing at the time of application; or</li> <li>• Proof that property taxes are currently subject to forbearance.</li> </ul>
If there is a mortgage on the property, the mortgage is in good standing	<ul style="list-style-type: none"> <li>• Most recent mortgage statement, at time of application, showing no arrearages (except for documented cases of lender/servicer forbearance) <ul style="list-style-type: none"> <li>• Example: HUD may provide assistance to homeowners holding FHA mortgages following a federally declared disaster</li> </ul> </li> </ul>
Applicant must not be in bankruptcy or foreclosure	<ul style="list-style-type: none"> <li>• Current credit report (dated within one (1) month of application date) <ul style="list-style-type: none"> <li>• A soft pull credit report is acceptable</li> </ul> </li> </ul>
No current code enforcement or law enforcement complaints against the property and/or Applicant	Verified by the County via a County and municipal code enforcement records.
Property must not be located in a regulatory floodway	Verified by County via FEMA Flood Insurance Rate Maps (FIRM)

## Ownership

To qualify for the RRP, Applicants must currently own the storm-impacted property and be able to demonstrate ownership at the time of one of the 2024 Hurricanes. Applicants who receive assistance must agree to maintain ownership and lease all assisted units to LMI tenants at affordable rents for 10 years (i.e., unit(s) received rehabilitation) or 20 years (unit(s) received reconstruction) after construction is completed. Applicants must agree to not sell or transfer the property, whether voluntarily or involuntarily until expiration of the program compliance period. Applicants must notify the County before any transfer of the property if that transfer occurs before the end of the 10- or 20-year affordability period.

## MHU Ownership

Applicants applying for RRP assistance for an MHU must establish ownership at the time of the 2024 Hurricanes. Additionally, Applicants must own the land in which the MHU is located. Cases where the owners of the land and dwelling differ are ineligible. Proof of ownership can be established via submission of one or more of the documents outlined in *Table 2*.

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 RRP may also recognize other valid forms of MHU or property ownership, including copies of the aforementioned documents in *Table 2* 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.

## Title Clearance Activities

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Applicants with ownership interest in a property who cannot supply the acceptable ownership documents as outlined in this guide due to heirship or probate issues may be afforded up to six (6) months from the date of application to clear title defects related to probate and/or heirship and provide the program with an acceptable document to demonstrate ownership. If an Applicant cannot sufficiently resolve ownership issues within six (6) months of application submission, the case will be deemed ineligible for failure to sufficiently prove ownership of the storm-impacted property.

## Death of an Applicant

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If an Applicant becomes deceased after submitting an RRP application, but before construction begins, their heir may still be eligible for assistance but must meet all eligibility criteria and agree to RRP compliance requirements.

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

## Property Must be Located in Manatee County, Florida

To be eligible, a property must be located in Manatee County, Florida. The program will verify the property location using the property address, GIS coordinates/mapping, or a physical inspection.

## Eligible Structure Type and Repairs

To be eligible for RRP assistance, the property must be one of the following eligible structure types:

### Single-Family Stick-Built/Concrete Block Homes

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Eligible repairs include:

- General repairs to roofs, windows, doors, and interior;
- Structural repairs to foundation, framing, roofing, exterior walls, floors and ceilings;
- Mechanical systems repair (HVAC Systems, Plumbing Systems, Electrical Systems, Appliances, and Gas Systems);
- Implementation of weatherization/energy efficiency components;
- Correction of building code violations;
- Lead-based paint, asbestos, and mold remediation;
- Elevation in SFHA flood zones;
- Additional mitigation retrofits (as applicable)

Modular homes are considered stick-built homes under the RRP.

### MHUs

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- Repairs to structure, roofing, siding, flooring, and electrical/plumbing;
- General repairs to windows, doors, and interior;
- Implementation of weatherization and storm retrofit components;

### Townhomes, Condominiums, Duplexes, Triplexes, Quadplexes (7 total units per structure or fewer):

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- Unit-by-unit structural interior and/or system repair;
- General repairs to windows, doors, and interior;
- Repair to systems serving building as a whole, including roofs, shared HVAC systems, common plumbing lines, etc.

## Ineligible Structures

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The following structure types are ineligible for assistance under RRP:

- Garages, sheds, and outbuildings not attached to the main dwelling unit (these structures are not eligible for repair but may be eligible for demolition);
- Recreational vehicles and camper trailers;
- Houseboats;
- Second homes;
- Seasonal, short-term, and vacation rental properties;
- Housing units located where federal assistance is not permitted by federal regulation, including floodways, or within a Coastal Barrier Resources System unit;
- Properties with delinquent mortgages, delinquent real property taxes, or properties that are subject to bankruptcy proceedings or in foreclosure;
- Properties located on sites with extraordinary site conditions, such as environmental limitations imposed by building codes, or that are located in a floodway;
- Properties currently under construction and/or contract by private contractor;
- Townhomes/Condominiums/Duplexes/Triplexes/Quadplexes that require elevation.

## Property Taxes Current

Applicants must be current on property taxes, be on a payment plan in good standing, or be subject to forbearance at the time of application. Applicants must submit the documentation outlined in *Table 2* to verify compliance with property tax requirements.

## Mortgage in Good Standing

If the subject property has a mortgage, the mortgage must be in good standing. As outlined in *Table 2*, Applicants who have a mortgage on the subject property must submit proof of a mortgage in good standing at the time of application. Applicants who have previously fallen into arrears on a mortgage may be eligible, if:

- The Applicant can demonstrate the mortgage is currently in good standing or;
- A payment arrangement has been agreed to by the lender and the payment arrangement is in good standing.

## No Bankruptcy or Foreclosure

Applicants must not be in active foreclosure on any property, including but not limited to the subject property and must not be involved in bankruptcy proceedings, even bankruptcy

proceedings not related to the subject property. As identified in *Table 2*, Applicants must submit a current credit report from a nationally-recognized credit reporting agency.

## No Code Enforcement or Law Enforcement Complaints

Applicants are ineligible for assistance if there are any active code enforcement actions or law enforcement complaints pending against the Applicant or the property.

## Renter Verification

Under the RRP, it is critical to ensure that program benefits are provided to eligible LMI renter households. In the event a unit is occupied at the time of Application, the following will be reviewed by the program:

- Photo Identification: Tenants aged 18 or older are required to submit valid photo identification. Expired photo identification will not be accepted. Tenant household members under the age of 18 must submit proof of age and identity. Birth certificates must be submitted for all tenant household members aged 17 and under.
- Income Certification: Tenants must provide a Self-Certification of Annual Income Form disclosing the total household income.
- Lease Documentation: A valid lease agreement must be provided to confirm tenancy, rent amount, and unit location.
- Occupancy Verification: Government issued photo identification (e.g., driver's license), utility bill in the tenant's name, or employer's statements (e.g., paystubs) will be required to confirm that the tenant resides in the unit. Other documents may be considered on a case-by-case basis.
- Duplication of Benefits (DOB) Check: Tenants must disclose any other disaster-related assistance received including FEMA, insurance, and/or other sources.

Applicants are prohibited from evicting lawful tenants for the sole purpose of participating in the RRP. Tenants may not have relation or be related with the Applicant or may cause a conflict of interest.

## PHA Considerations

The Manatee County Housing Authority (MCHA) and Housing Authority of the City of Bradenton (HACB) may apply for funding under the RRP to address recovery needs associated with units under their management. Up to \$1 million of the RRP is set aside for the PHAs with the understanding that this may involve reimbursement of pre-agreement costs already paid, including insurance deductibles.

## Reimbursement (PHAs Only)

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RRP funds can support PHAs when they incur eligible costs for restoring rental housing, including insurance deductibles. Reimbursement is possible if the expenses meet HUD's criteria and are properly documented. To qualify for reimbursement, PHAs must adhere to the following:

Eligibility Criteria:

- **Disaster-Related Need:** Costs must be tied to damage or unmet housing needs from the 2024 Hurricanes.
- **Eligible Activity:** Expenses must fall under HUD-approved activities (rehabilitation or reconstruction of affordable rental units)
- **Proper Procurement:** Costs must comply with 2 CFR 200 procurement standards.
- **Environmental Clearance:** Work must not begin before environmental review unless waived or pre-approved.
- **Duplication of Benefits (DOB):** PHAs must show that no other forms of assistance covered the same costs.

## Documentation Requirements

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PHAs will be required to submit the following documentation:

- Detailed invoices and receipts
- Proof of payments
- Scope of work and construction contracts
- Environmental review records (if applicable)
- DOB analysis and certifications
- Evidence of procurement compliance

Once all of the above is confirmed, PHAs may submit reimbursement requests to the County. The request(s) will follow the procedures outlined in the *Manatee County CDBG-DR Financial Management Policy* published on the County's CDBG-DR website at: [www.lastingmanatee.org/pages/documents](http://www.lastingmanatee.org/pages/documents).

# Duplication of Benefits

Eligible Applicants may have previously received assistance from other sources for the repair of their storm-impacted property. Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), (see 42 U.S.C. § 5155) prohibits any person, business

concern, or other entity from receiving federal funds for any part of such loss as to which they have received financial assistance under any other program, from private insurance, charitable assistance, or any other source.

During the application process, the Applicant must report any and all assistance received from other sources for the repair, replacement, or reconstruction of their storm-impacted property. Previous funds received and reported by the Applicant are verified by RRP during the DOB review process. Not all previous assistance received constitutes a DOB.

The RRP will follow the County's *CDBG-DR Procedures for Prevention of Duplication of Benefits*.

## DOB Gap

A DOB Gap is the amount of duplicative funding (e.g., insurance, FEMA, SBA loans) that cannot be included in an Applicant's award. If the DOB analysis reveals that a DOB Gap exists, the DOB Gap must be satisfied prior to the execution of a Property Owner Grant Agreement.

*Table 3 – DOB Gap Calculation Example*

<b>Funding</b>	<b>Amount</b>
Total Reconstruction Cost	\$200,000
Insurance Proceeds	\$50,000
FEMA Individual Assistance	\$25,000
DOB Gap (Total Duplicative Assistance)	\$75,000
<b>Award Amount (Unmet Need)</b>	<b>\$125,000</b>

The DOB Gap may be satisfied by the Applicant in one or a combination of the following ways:

- The DOB Gap amount along with all future non-excludable benefits received by Applicant shall be provided to the County and deposited in a DOB Gap Funding Account prior to the execution of the Property Owner Grant Agreement.
- If the Applicant qualifies for a reconstruction or replacement award, the DOB Gap may be satisfied through a scope reduction which reduces the dollar value of the benefit provided to the Applicant through RRP, as described in the sections below. Applicants who qualify for a rehabilitation award may not elect a scope reduction.

Applicants will be notified in writing if a DOB Gap is discovered. Applicants will have 30 calendar days from the date of notification to appeal the DOB Gap determination or satisfy

the DOB Gap by providing funds in the amount of the DOB Gap, accepting a scope reduction as described below, or both. If an Applicant fails to satisfy the DOB Gap within the 30-day timeframe allotted, the Applicant's case will be closed.

### Scope Reduction for DOB Gap

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If the Applicant qualifies for a rehabilitation award, and a DOB Gap is discovered, the Applicant must provide funds in the amount of the DOB Gap to be deposited into a DOB Gap Funding Account prior to executing a Property Owner Grant Agreement. The RRP will not proceed with award or construction activities until the DOB Gap is resolved. Given that rehabilitation will only bring the home back up to current code or program standards, the scope reduction option to cover DOB Gaps cannot be offered on rehabilitation projects.

If the Applicant qualifies for a replacement or reconstruction award, and a DOB Gap is discovered, the Applicant shall:

- Provide funds in the amount of the DOB Gap to be deposited into a DOB Gap Funding Account prior to award and commencement of program-sponsored construction; and/or
- Opt for a scope reduction to select a lower-cost home than what the Applicant qualifies to receive from the program.
  - The cost differential between the home for which an Applicant qualifies and the lower priced home they select will be used to offset any DOB Gap.

Applicants eligible for reconstruction or replacement may elect to take a scope reduction and/or provide funding to close the DOB Gap. If the Applicant elects to take a scope reduction, RRP will assist the Applicant with choosing a less expensive house plan.

Applicant-provided funds that are deposited into the DOB Gap Funding Account will count toward the RRP award cap of \$425,000. All DOB Gap Funding will be drawn down first, prior to the use of program funds.

### Subrogation

If additional funds are made available or paid to the Applicant for repair, reconstruction, replacement, and/or elevation of the damaged structure at any point after RRP has approved funding for the Applicant, those funds constitute a DOB and must be returned to the County. Applicant awardees will be required to sign a Subrogation Agreement as part of their grant agreement with the RRP.

# Damage Assessment

RRP staff will conduct a damage assessment to prepare a scope of work and Estimated Cost of Repair(s) (ECR). Units with damage unrelated to the 2024 Hurricanes will only be assessed if they also have hurricane-related damage.

The information gathered from the damage assessments will help determine the following:

- **Eligibility:** To qualify for RRP assistance, the property must be linked to one or more of the 2024 Hurricanes, have remaining storm damage, and meet the eligible structure criteria outlined in this policy.
- **Award Type:** The ECR is compared against the pre-storm value of the structure to determine the award type, whether the property is substantially damaged (SD), or would be substantially improved (SI) after receipt of program assistance.
- **DOB:** During the assessment, the inspector will create a Damage Repair Valuation (DRV) to identify repairs made by the Applicant. The DRV will be considered in the DOB review and may offset repairs otherwise eligible under the RRP.

The Applicant or Applicant's designee should be present for the damage assessment. Inspections will be conducted on both the interior and exterior of the home to observe and record any and all damage. The inspector will complete an environmental questionnaire at the time of the damage assessment and will note any environmental concerns on the site or nearby that could affect the evaluation. Identifiable environmental concerns may include proximity to bodies of water or coastal zones, hazardous materials and contaminated sites, protected resources, or historical/archaeological preservation concerns. Any identified environmental concerns must be adequately documented at the time of the assessment.

Additionally, according to HUD's Lead-Based Paint (LBP) regulations (24 CFR Part 35), any structures built before 1978 must be inspected for LBP hazards. If hazards are found, the Applicant will be informed, and steps will be taken within the RRP scope to address the risks associated with LBP.

## Valuation of Needed Repairs

The damage assessment inspector will prepare an ECR, providing a documented line-item estimate of the repairs needed to address remaining storm damage and meet program standards. The noted repairs must include unrepaired storm damage but also may include items that:

- Satisfy current building code(s);

- Meet all health and safety concerns;
- Meet decent, safe, and sanitary standards; or
- Display poor workmanship.

The ECR quantifies the materials and labor necessary to repair observed damage and assigns a dollar value for each line item. Dollar values assigned to items quantified during the damage assessment will be based on values derived from advanced estimating software for standard grade items and associated labor.

The ECR does not provide an exact estimate for replacement and/or structural repair of the Applicant's pre-disaster home. In contrast to insurance estimates that may be based on replacement costs, the ECR evaluation is based on costs developed by the construction industry for those items, at standard builders' grade prices. The methodology used to prepare the ECR is to account for those scope items that can be counted, measured, or observed.

Damage assessments are often conducted while individuals or families are living in the home. Inspectors will not move or remove personal items to observe, measure, or quantify damages. Additionally, no destructive testing is performed during the estimation process. This means that hidden damage is not accounted for during this process. For example, termite damage behind a wall would not be discoverable during the estimation process if the wall covering is intact.

Essential appliances, including stove/range, oven, dishwasher, refrigerator, microwave, water heater, and heating/ventilation/air conditioning (HVAC) equipment, damaged by the 2024 Hurricanes are eligible to be replaced under RRP and will be assessed during the damage assessment. The installation of a central air conditioning system, where it currently does not exist, is permissible where feasible. Appliances and housing components that are not integral to the structure of the home and are not essential to basic health and safety, will not be considered for assistance under RRP and therefore will not be assessed. Ineligible components may include washers, dryers, stand-alone freezers, detached garages, and carports. Luxury items and items with a quality grade above basic standards, such as granite countertops, are also not eligible to be replaced in a like-for-like manner and will not be valued as such. Standard builders grade pricing will be applied to such items.

## Valuation of Storm Damage Repaired prior to Application

During the damage assessment, the inspector will review any repairs made by the Applicant prior to applying to the RRP. Any repairs made by the Applicant will be captured in a DRV which will be considered during the DOB analysis to offset DOB, if appropriate.

The value assigned to cost of repairs completed uses standard builders' grade materials and construction industry standard pricing for those items. Luxury items and items repaired with quality grade (above basic) standards, such as granite countertops, are not eligible to be replaced in a like-for-like manner and will not be valued as such. Standard builders grade pricing will be applied to such items.

The cost of such repairs completed by contractors will be valued and will include the cost of contractor labor and overhead/profit, as well as materials. Applicants will not be credited for "Sweat Equity" associated with self-completed repairs. "Sweat Equity" refers to the value of labor contributed by homeowners (or sometimes volunteers) toward rehabilitation, repair, or reconstruction of their home. Repairs completed by contractors will be valued including contractor labor and overhead/profit in addition to materials.

## Lead Based Paint Risk Assessment

All properties with an initial award type determination of repair that were built prior to 1978 will be subject to a LBP risk assessment pursuant to HUD's LBP regulations under [24 CFR Part 35](#). Lead hazard assessments are on-site investigations to determine the existence, nature, severity, and location of LBP hazards accompanied by a report explaining the results and options for reducing LBP hazards. All lead hazard assessments for the RRP will be performed by Risk Assessors or LBP Inspectors certified by the U.S. Environmental Protection Agency (EPA).

If the unit to be assisted was built prior to 1978, it will be tested for LPB, soil, or dust hazards. If present, the stabilization, encapsulation, or removal of LBP will be considered in the cost of rehabilitation and included in the feasibility analysis for repair versus reconstruction. Projects involving homes that will be reconstructed or replaced will result in the demolition and removal of the structure. As such, no LBP testing will be conducted on reconstruction or MHU replacement projects designated for reconstruction or replacement at the time of the initial site inspection.

# 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.

RRP 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 project 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) will jeopardize Federal funding for the Project and all costs incurred will be ineligible.

Any homes being repaired or rehabilitated under CDBG-DR must be brought to a decent, safe, and sanitary standard upon completion of the project(s). Additionally, 24 CFR Part 58 requires identification and mitigation of all identified environmental hazards for overall program compliance. This includes removal of LBP hazards, as well as asbestos abatement. Any action taken to address environmental concerns such as these may be mitigated/addressed before or after the construction process, if feasible. Actions taken to

address environmental hazards such as LBP or asbestos abatement are considered eligible under RRP and therefore shall be included in the cost of repair and/or reconstruction. 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 rehabilitation, demolition, or reconstruction. 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 Environment Review Policies and Procedures.

*Table 4 - Link to Manatee County Environmental Review Policy and Procedures Manual*

<b>File Name</b>	<b>File Link</b>
Manatee County Environmental Review Policy and Procedures Manual	<a href="https://manateegis.maps.arcgis.com/sharing/rest/content/items/77f29cf4571e47369323c719746a759a/data">https://manateegis.maps.arcgis.com/sharing/rest/content/items/77f29cf4571e47369323c719746a759a/data</a>

## **Award and Property Owner Grant Agreement**

Following RRP project review, those deemed eligible to receive an RRP award will receive an Award Letter from the program. The Award Letter will outline the terms of the award as well as the steps the Applicant must take to accept the award. After the Award Letter is sent, the Applicant Eligibility Specialist will schedule execution of the Property Owner Grant Agreement with each eligible Applicant. All owners of the assisted unit must sign the Property Owner Grant Agreement.

During the execution of the Property Owner Grant Agreement, the Applicant Eligibility Specialist will collect reasonable accommodation requests (if applicable), and will review the information outlined in the agreement. Information reviewed will include Applicant responsibilities before, during, and after construction, including compliance period requirements.

Additional requirements pertaining to the Award and Property Owner Grant Agreement Process include the following:

- The Applicant must sign the Property Owner Grant Agreement or appeal the award determination within 30 calendar days of Award Letter issuance or the case will be closed.
- If an Applicant is deemed eligible and awarded, the award type is determined based primarily on the following factors:
  - Estimated Cost to Repair;
  - DOB;
  - Structure age (if MHU); and
  - Program Award Caps.

## Award Caps

The following award caps apply to Property Owner Applicants of the RRP:

- Rehabilitation: Up to \$250,000 per eligible unit
- Replacement, Reconstruction and/or Elevation: \$425,000 per eligible unit

The award cap for the MCHA and HACB is up to the PHA set-aside under the RRP of \$1,000,000.

All costs associated with construction, elevation, reasonable accommodations, environmental mitigation/abatement, historic preservation, site specific costs, essential appliances, and code compliance/permitting are included in the award caps.

## Reasonable Accommodations

Applicants with a disabled tenant household member may be entitled to additional construction considerations in compliance with the Fair Housing Act, Section 504 and 24 CFR 8. Additional construction consideration will include accommodations such as low threshold showers, bathroom grab bars, outward swinging doors, exterior ramps, comfort height toilet with grab bars, or other accessibility features that will assist with the individual's functional need. Requests for reasonable accommodations (e.g., visual, hearing, mobility) must be submitted to the RRP. The RRP will assess eligibility for these features on a case-by-case basis by assistance benefit type by way of a completed reasonable accommodation request form. Awards may include expenses for additional costs related to accessibility modifications for the disabled.

To be considered for reasonable accommodations, a disabled tenant household member (or a household with a person with disabilities permanently residing in the household) must submit a Verification of Disability Form. The Applicant or any household member may qualify for reasonable accommodation but the respective must be a permanent resident of the

home and be included in the listed household members used to determine household income.

There is no HUD or otherwise federally enforced accessibility standard for privately owned, single-family, construction projects. Multi-family units must comply with the accessibility requirements in the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973. The program will endeavor to provide reasonable accommodations that enable each Applicant and their tenants to enjoy full use of the program-assisted home.

## Rehabilitation

Eligible Applicants shall qualify for a rehabilitation award type when the estimated cost to repair is greater than \$5,000 and less than \$250,000, and the property is not otherwise deemed not suitable for rehabilitation. Eligible Applicants with MHUs qualify for a rehabilitation award type when the estimated cost to repair is less than \$25,000, the MHU is less than five (5) years old, and the property is not otherwise deemed not suitable for rehabilitation.

### Not Suitable for Rehabilitation

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The RRP defines “not suitable for rehabilitation” as:

- Structures condemned or “red-tagged” by the County;
- Structures that cannot be repaired under existing RRP award caps, due to legal, engineering, or environmental constraints (permitting, extraordinary site conditions, etc.);
- Structures that are structurally unsafe or that have other conditions that make interior inspection by RRP impossible or unsafe;
- Structures that have already been demolished; or
- The housing unit is a construction on a slab on grade and requires elevation.

Eligible Applicants with rental properties deemed not suitable for rehabilitation may be offered reconstruction assistance, if the Applicant owns the land on which the structure sits, and reconstruction is feasible.

### Rehabilitation Scopes of Work

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RRP assistance is intended to repair remaining damage from the 2024 Hurricanes and to make the home decent, safe, and sanitary. RRP does not provide assistance for “like for like” repairs. RRP repairs will be completed using standard economy/builders’ grade materials,

not higher-grade materials that were damaged by the disaster. For example, if a rehabilitation award calls for replacement of cabinets, the program will replace existing cabinets with standard grade cabinets, regardless of the grade of the pre-existing cabinets.

Repair scopes of work will be limited to those items identified by the RRP as in need of repair to bring the home back up to decent, safe, and sanitary conditions. Repairs, upgrades, or modifications requested by the Applicant will not be considered. For example, if some windows are in need of repair or replacement, the program would replace those windows in need of repair only; other operable windows would not be replaced or repaired.

Standard essential appliances that are not functioning or non-existent at the time of damage assessment will be replaced. Essential appliances include stove/range, oven, water heater, refrigerator, microwave, and HVAC systems. Dishwashers may be replaced, only if a dishwasher previously existed in the home. Rehabilitation awards will not receive a dishwasher if a dishwasher was not present at time of damage assessment. Washing machines and dryers, microwaves, stand-alone freezers, and other non-essential appliances are not eligible for replacement.

Luxury items, including but not limited to, high-end countertops, high-end appliances, stone flooring, security systems, swimming pools, spas, fireplaces, sheds, outbuildings, fences, and television satellite dishes are not eligible under RRP.

Because repair scopes of work only address items in need of repair for the home to be decent, safe, and sanitary, RRP does not guarantee that work completed as part of a rehabilitation award will match other items in the home. Some examples of this include, but are not limited to:

- Flooring replaced in portions of a home may not match flooring in other rooms. RRP will replace flooring by room, to the nearest cased opening.
- Light fixtures replaced may not match pre-existing light fixtures or fixtures in other parts of the home.
- If only a portion of the windows require replacement, all the windows in the home may not match.
- If a portion of the home requires paint, paint in the repaired portion of the home may not match paint in other rooms (interior) or on other elevations (if exterior). RRP will paint whole interior rooms, to the door casing, or whole exterior sections to the next architectural break. Additional rooms or elevations will not be included for aesthetic reasons alone.

## Reasonable Accommodations – Rehabilitation Award Type

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Applicants who qualify for a rehabilitation award type may qualify for reasonable accommodations in rooms/areas where program scope of work exists. In general, reasonable accommodations will only be made on repair projects if the program scope of work impacts the item and room where a reasonable accommodation is requested. For example, if the program scope of work does not include removal/replacement of a tub/shower, the program will not modify the existing tub/shower for the sole purpose of installing or modifying the existing facilities to include accessibility features.

If the program scope of work impacts the kitchen, bathroom, or entryway in a repair project, the Applicant may request reasonable accommodation in those areas. Reasonable accommodations for bathrooms are offered in three (3) tiers, so that the Applicant may request the level of accommodation that best suits the needs of their tenants.

Accessibility modifications will only be made in one (1) bathroom. Applicants who request accommodation in a bathroom may select one (1) of three (3) standard available options, described in more detail below. If the repair project scope includes more than one (1) bathroom, the reasonable accommodation will be installed in the bathroom that is in the program scope of work where modifications are the most feasible within the scoping of work and existing dimensions within the room.

The RRP will not move walls to expand the size of an existing bathroom or relocate plumbing lines to install an accessibility accommodation. Because repair projects are largely constrained by the size of existing rooms, there is no standard width/length size requirements for tub/shower compartments. The RRP will attempt to replace tub/showers with fixtures similar in size to the existing fixtures.

### Bathroom Reasonable Accommodation 1

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Applicants who opt for Reasonable Accommodation 1 (RA-1) will be provided one (1) bathroom with the following accessibility modifications:

- Tub/Shower combination with blocking and a grab bar; and
- Chair height toilet with grab bars.

### Bathroom Reasonable Accommodation 2

---

Applicants who request Reasonable Accommodation 2 (RA-2) will be provided one (1) bathroom with the following accessibility modifications:

- Tub/Shower combination with blocking, grab bars, seat, and shower wand; and
- Chair height toilet with grab bars.

### Bathroom Reasonable Accommodation 3

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Applicants who request Reasonable Accommodation 3 (RA-3) will be provided one (1) bathroom with the following accessibility modifications:

- Roll-in shower compartment to fit existing tub/shower space, equipped with grab bars, seat, and shower wand;
- Chair height toilet with grab bars; and
- Roll under vanity, only upon request.

### Kitchen Reasonable Accommodations

---

Applicants may indicate reasonable accommodations to make a kitchen more accessible. Reasonable accommodations in kitchens for rehabilitation award types must be accommodations to items included in the program scope of work, and may include:

- Wheelchair accessible cook top (knobs on front of the appliance); and
- Roll under kitchen sink.

Items not included in the program scope of work will not be modified for the sole purpose of providing an accessibility modification. Accessibility modifications will only be made to the primary kitchen at the property, if more than one kitchen is available.

## Reconstruction

Eligible Applicants shall qualify for a reconstruction award type when the estimated cost to repair the home exceeds 50 percent of the pre-storm value. Eligible Applicants with properties otherwise deemed not suitable for rehabilitation may also qualify for a reconstruction award if the Applicant owns the land and it is feasible to reconstruct the structure on the property. All elevated reconstruction projects will receive a stick-built home.

Eligible Applicants with MHUs may qualify for reconstruction only if it is infeasible to replace an MHU on the Applicant's property and the Applicant owns the land on which the MHU is situated. RRP considers it infeasible to replace an MHU if:

- The MHU must be elevated above a standard 5-foot installation height;
  - Zoning or municipal regulations prohibit installation of a mobile home on the property;
- or

- Other engineering, environmental, or site constraints make installation of an MHU onsite infeasible.

It should be noted that MHU Applicants shall not be awarded a reconstruction award simply due to Applicant preference.

Rental properties that meet the threshold for a reconstruction award will be demolished and reconstructed in substantially the same footprint, when feasible. Reconstructed homes will meet local and state building codes and will incorporate resilience measures to the extent possible.

### Size and New Unit Configuration

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RRP will provide Applicants who qualify for reconstruction awards with standard program floorplan homes. RRP offers two (2)-, three (3)-, and four (4)-bedroom homes; all standard floorplans that include two (2) bathrooms. The standard floorplan that the Applicant receives is based on the number of bedrooms present in the storm-impacted property and verified via the damage assessment. Exceptions to reconstructed home bedroom/bathroom configuration will be considered if overcrowding exists within the home, if the home previously had more than the standard number of bathrooms, or if an Applicant elects to reduce the number of bedrooms and/or bathrooms to reduce a DOB gap.

- If the storm-impacted property had two (2) bedrooms or fewer, the Applicant will receive a standard two (2)-bedroom, two (2)-bathroom home.
- If the storm-impacted property had three (3) bedrooms, the Applicant will receive a standard three (3)-bedroom, two (2)-bathroom home.
- If the storm-impacted property had four (4) bedrooms or more, the Applicant will receive a standard four (4)-bedroom, two (2)-bathroom home.

RRP reconstructed homes do not include reconstruction of detached garages, sheds, pool houses, or other outbuildings. Such outbuildings may be demolished during reconstruction to allow enough space for the new home to be built or because such structures pose a health or safety issue.

The following is a non-exhaustive list of items that are not included or considered when determining the floorplan, bedroom/bathroom configuration, or size of the reconstructed home provided by RRP:

- Interior or exterior finishes;
- Square footage;
- Number of bathrooms (if more than 2); and

- Extra/Bonus rooms such as dens, playrooms, offices, studies, libraries, etc.

## Reasonable Accommodations – Reconstruction Award Type

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All reconstructions will receive the following universal accommodations, regardless of whether a Reasonable Accommodation has been requested by the Applicant:

- 36” hallways, wide enough to accommodate a standard wheelchair;
- Adequate turning radius for a wheelchair in the kitchen;
- Adequate turning radius for a wheelchair in bathroom;
- All doors installed with levers instead of knobs; and
- Exterior doors, bedroom doors, and bathroom doors are 36” wide.

In addition, the Applicant may request reasonable accommodations in the bathroom, kitchen, entrance, and/or strobe smoke detectors throughout. Other reasonable accommodations (e.g., visual, hearing) will be considered by the RRP.

## Reasonable Accommodations – Bathroom

---

Applicants who request accommodations in a bathroom may select one (1) of three (3) standard available options. Accessibility modifications will only be made in one (1) bathroom. Applicants must specify the bathroom to be modified bathroom on a completed Reasonable Accommodation Request Form.

### Bathroom Reasonable Accommodation 1

---

Applicants who opt for Reasonable Accommodation 1 (RA-1) will be provided one (1) bathroom with the following accessibility modifications:

- Tub length of 60” and tub width of 36” in master bath. Hallway bathtub is 60” x 30”, with no seat. Grab bars installed near the tub/shower enclosure; and
- Chair height toilet with grab bars.

### Bathroom Reasonable Accommodation 2

---

Applicants who request Reasonable Accommodation 2 (RA-2) will be provided one (1) bathroom with the following accessibility modifications:

- Tub/Shower combination with blocking, grab bars, seat, and shower wand; and
- Chair height toilet with grab bars.

### Bathroom Reasonable Accommodation 3

---

Applicants who request Reasonable Accommodation 3 (RA-3) will be provided one (1) bathroom with the following accessibility modifications:

- 30"x60" roll-in shower compartment, equipped with grab bars, seat, and shower wand;
- Chair height toilet with grab bars;
- Roll under vanity.

## Reasonable Accommodations – Kitchen

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Applicants may indicate reasonable accommodations to make a kitchen more accessible. Standard reasonable accommodations for kitchens in reconstruction project types include:

- Wheelchair accessible cook top (knobs on front of appliance); and
- Roll under kitchen sink.

## MHU Replacement

Eligible Applicants with MHU properties qualify for a replacement award type when the estimated cost to repair is greater than \$25,000 and/or the MHU is at least five (5) years old. MHUs that meet the threshold for a replacement award will have the existing unit removed or the site cleared and a new MHU will be installed in substantially the same footprint, when feasible.

## Size and New Unit Configuration

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RRP will provide Applicants who qualify for replacement awards with two (2)-, three (3)-, and four (4)-bedroom singlewide or doublewide MHUs, and all bedroom configurations include two (2) bathrooms. The unit configuration an Applicant receives is based on the number of bedrooms of the storm-impacted property and the width (single- or double-wide) of the storm damaged MHU, as verified by the damage assessment. After-market additions are not considered when determining the width or number of bedrooms in the storm damaged MHU (i.e., if a third bedroom was added on to a single-wide two (2)-bedroom MHU, the home will be considered a two (2)-bedroom, single-wide MHU). Exceptions to replacement MHU bedroom configurations will only be considered if overcrowding exists within the home or if the Applicant elects to reduce the number of bedrooms via scope reduction to reduce or eliminate a DOB gap.

The following standards apply to MHU Size and New Unit Configuration under RRP:

- If the storm-impacted property had two (2) bedrooms or fewer, the Applicant will receive a two (2)-bedroom, two (2)-bathroom MHU.

- If the storm-impacted property had three (3) bedrooms, the Applicant will receive a three (3)-bedroom, two (2)-bathroom MHU.
- If the storm-impacted property had four (4) bedrooms or more, the Applicant will receive a four (4)-bedroom, two (2)-bathroom MHU.

The storm-damaged MHU width configuration will also be based on the width of the storm damaged MHU. RRP only provides single-wide and double-wide units. Triple-wide or larger units will not be provided under RRP.

The following applies to width of MHU's under RRP:

- If the storm damaged MHU was a single-wide, the Applicant will receive a single-wide unit.
- If the storm damaged MHU was a double-wide, triple-wide, or larger width configuration, the Applicant will receive a double-wide unit.

All MHUs sourced by the program must be HUD approved units. RRP does not offer standard floorplans. RRP offers standard bedroom/bathroom configurations in single-wide or double-wide units with standard square footage ranges as outlined in *Table 5*.

*Table 5 – MHU Standard Floorplan Breakdown*

<b>Bedroom/Bathroom Configuration</b>	<b>Conditioned Square Footage</b>
Single-wide 2 bedroom / 2 bathroom	750 – 900 SF
Single-wide 3 bedroom / 2 bathroom	1000 - 1200 SF
Single-wide 4 bedroom / 2 bathroom	1000 – 1200 SF
Double-wide 2 bedroom / 2 bathroom	1000 – 1250 SF
Double-wide 3 bedroom / 2 bathroom	1250 – 1500 SF
Double-wide 4 bedroom / 2 bathroom	1400 – 1800 SF

RRP replacement MHUs do not include replacement or reconstruction of detached garages, sheds, pool houses, carports, or other outbuildings. Such outbuildings may be demolished during construction to allow ample space for the new MHU to be delivered/installed or because such structures pose a health or safety issue.

The following is a non-exhaustive list of items that are not included or considered when determining the bedroom/bathroom configuration, or size of the replacement MHU provided by RRP. RRP does not reconstruct like-for-like:

- Interior or exterior finishes;
- Square footage;

- Manufacturer of the storm damaged unit;
- Extra/bonus rooms such as dens, playrooms, offices, etc.;
- Aftermarket additions such as additional rooms or covered porches.

## MHU Relocation

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RRP allows for replacement of a MHU in an alternate location only when replacing the MHU in the same location as the storm damaged MHU is prohibited or not feasible. MHU relocations may be considered under the following circumstances:

- If MHU must be elevated above the standard 5-foot installation height;
- If zoning or municipal regulations prohibit installation of a mobile home on the property;
- If other engineering, environmental, or site constraints make installation of an MHU onsite infeasible; or
- The current property is within a Floodway.

RRP does not provide replacement property for Applicants. To be allowed to replace an MHU on an alternate property, the Applicant must source or already own the alternate location within 60 calendar days of receiving Notification of Relocation. Alternate locations must be in Manatee County, within a previously developed lot, zoned to allow for installation of a MHU, have ready access to sewer, water, and electric connections, and must not be in a SFHA. Alternate MHU sites must pass an environmental review before the Applicant makes a binding commitment to lease or purchase land. If an Applicant enters into a binding agreement to lease or purchase alternate land before the program has environmentally cleared the alternate parcel, the Applicant may be ineligible for assistance, as this constitutes a choice-limiting action.

## Reasonable Accommodations – Mobile Home Replacement Award Type

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Applicants who qualify for a replacement award type may request reasonable accommodations. Reasonable accommodations in MHU projects are limited by manufacturer specifications and unit availability. Applicants who request Reasonable Accommodation will be provided with an “accessibility adapted” mobile home unit. Accessibility adapted designations are controlled by the MHU manufacturer and may include features such as wider doorways, grab bars, or low-threshold shower compartments.

# Pre-Construction

After the Property Owner Grant Agreement is executed, the project enters the “pre-construction” phase. During the pre-construction phase of the program, several key activities take place which prepare the project for the start of physical construction. Key activities which take place during the pre-construction phase of the program include, but are not limited to:

- **General Contractor Assignment:** The Applicant will be provided a list of vetted General Contractors (GCs) they can select to undertake and complete the project. If the Applicant has no preference or requests assistance with selecting a contractor, the RRP will assign a GC to the project, depending on availability and the scope of the project.
- **Survey and Design:** The assigned GC will arrange for a property survey and engineering design for the project, as applicable.
- **Cost Estimate:** The assigned GC will visit the project site to validate and finalize the cost estimate.
- **Pre-Construction Meeting:** RRP staff will host a meeting with the Applicant to review key items as they relate to construction.
- **Permitting:** The assigned GC will obtain all permits required to complete the assigned scope of work.
- **Tenant Moveout and Utility Disconnection (if applicable):** Tenants may need to temporarily move out of the storm-impacted property for construction to take place, depending on the size and scope of the project. If applicable, Applicants and/or tenants must also arrange for utilities at the property to be disconnected. Lawful tenants of assisted properties may qualify for relocation assistance if they must relocate during RRP construction activities, as provided under the Uniform Relocation Act.

## Contractor Selection and Assignment

The RRP relies on a pool of qualified GCs to perform demolition, repair, reconstruction, elevation, and MHU replacement work. GCs will be procured and vetted via a Request for Proposals (RFP) process. GCs from the County’s approved list will be selected by Applicants to complete construction work following execution of the Property Owner Grant Agreement.

If an Applicant has no preference or requests assistance with selecting a contractor, the RRP will assign a GC to the project, depending on availability and the scope of the project.

Each home assigned to and completed by a GC will be graded on a score of 0 to 100 based on speed of preconstruction and construction activities, quality of construction, customer service, and GC capacity for additional work. Average scores will then be calculated for each GC based on the final scores from completed homes. GCs with higher scores may receive more assignments as they are operating at a higher level than GCs with lower scores.

## Survey and Design

Assigned GCs are responsible for completing property boundary surveys and engineering design, as applicable. Most reconstruction project types will require property boundary surveys to determine placement of the new home on the property within county or municipal set back boundaries. Repair and replacement projects are not likely to require boundary surveys or engineering work, however, each will be evaluated on a case-by-case basis.

## Cost Estimate

As part of the procurement of GCs, the RRP has developed standards for pricing for the award types offered by RRP. All costs incurred by RRP must follow the Cost Principles outlined at 2 CFR Part 200, Subpart E. Once a contractor is selected, RRP staff will provide the contractor with a preliminary scope of work.

- For MHU replacements, the program preliminary scope of work includes the number of bedrooms and bathrooms which must be included in the replacement MHU, any handicap accessibility modifications to be included, and the width of the unit (single-wide or double-wide).
- For reconstruction award types, the program preliminary scope of work includes the number of bedrooms and bathrooms which must be included in the replacement home, and any handicap accessibility modifications to be included.
- For rehabilitation award types, the program preliminary scope of work is included in the ECR, which relies on advanced estimating software and is prepared during the damage assessment phase.

GCs will visit each subject property to evaluate site-specific conditions that must be factored into the RRP cost estimate and to finalize the RRP-provided scope of work. The Applicant or their designee is required to attend the site visit conducted by the GC. Upon completion of the site visit and incorporation of any site-specific line items to the scope of work, the GC must submit the scope of work to the program for review and approval. The program must approve each scope of work before the GC may begin construction activities. Once approved, the RRP scope of work may only be modified via a duly authorized change order.

## Change Orders

RRP permits the use of change orders to modify the program-approved scope of work when necessary to deliver a decent, safe, and sanitary home within acceptable timeframes. Change orders must be initiated by the GC and agreed upon by the Applicant and RRP. GCs must substantiate the need for the change order, obtain Applicant acknowledgement, and demonstrate that costs associated with the change order are reasonable. Change orders initiated by the Applicant will not be considered under any circumstance.

Change orders are formal adjustments to a contract after it has been awarded. These changes can affect the scope of work, specifications, costs, or project schedules. The County has established the following process for requesting and submitting change orders.

- The reason for the change must be documented by the GC, Applicant, or RRP staff.
- Requested changes must fall within the original project scope and program eligibility.
- A written change order request must detail the impacts on the project (e.g., scope, cost, schedule).
- Independent Cost Estimates will be prepared and/or updated, along with the cost analysis to assess the reasonableness of the change (2 CFR 200.323).
- An Environmental & Program Compliance Review will be conducted to evaluate the change order's impact on environmental factors.
- The change order will be approved, executed and filed with the original contract. If the item being requested for change is an immediate health or safety risk, an exception may be granted for the approval process.
- Additional documentation justifying the change, including the cost analysis, will be retained for audit and record keeping purposes (2 CFR 200.334-337).

GC requests for a change order after the project passes a program final inspection will not be considered.

## Pre-Construction Meeting

After the scope of work has been approved by the RRP, the GC and Applicant Eligibility Specialist will host a "pre-construction" meeting with each Applicant. The purpose of the pre-construction meeting is to inform the Applicant of next steps, provide the Applicant with the floorplan or scope of work that will be performed by the program, and answer any construction related questions the Applicant may have. Key topics covered during the pre-construction meeting include, but are not limited to:

- **Tenant Moveout and Utility Disconnection:** Tenants may need to temporarily move out of the storm-impacted property for construction to take place, depending on the size and scope of the project. If applicable, Applicants and/or tenants must also arrange for utilities at the property to be disconnected. The GC, Applicant, and tenant will agree upon a date by which the home must be vacated with all utilities disconnected.
- **Site Conditions:** Project sites must be cleared of excessive debris and personal property. During the pre-construction meeting, the Applicant and tenant will be informed of actions they must take to prepare the site for construction. If the site includes excessive debris or personal property, the Applicant and/or tenant must clear the site within 30 calendar days of the pre-construction meeting. The Applicant will also be informed which, if any, outbuildings, landscaping, ancillary structures must be removed. Similarly, if the Applicant wishes to preserve any of the items slated for removal/demolition, the Applicant must remove the items from the property within 30 calendar days of the pre-construction meeting. Outbuildings, landscaping, and structures other than the storm damaged home which remain on the property 30 calendar days after pre-construction meeting may be demolished and RRP will not replace them.
- **Scope of Work:** The GC will present the Applicant with a copy of the program approved scope of work. If the project is an MHU replacement or reconstruction, the scope of work shall include a copy of the floorplan being offered.
- **Reasonable Accommodations:** The GC will confirm any reasonable accommodations included in the approved scope of work with the Applicant.

## Permitting and Code Compliance

GCs are required to complete all construction activities in accordance with local and state building codes. GCs are responsible for determining which permits are required and for acquiring all permits required to complete the RRP-approved scope of work from the authority having jurisdiction for code compliance in the location where the construction project is located. Permits required for each project vary by location and scope of work, but may include permits for items such as but not limited to:

- Demolition
- Septic
- MHU Installation
- Mechanical, electrical, or plumbing
- Building
- Roofing

- Asbestos or LBP Abatement

Applicants may be required to sign documents which authorize the GC to obtain permits from the authority having jurisdiction. Because requirements vary by jurisdiction, documents which require the Applicant’s signature may also vary. If required to sign or complete documents in support of permitting, the Applicant must do so within 30 calendar days of being presented with such documents.

GCs must demonstrate code compliance to pass a program final inspection. For reconstruction or MHU replacement projects, code compliance will be confirmed via a Certificate of Occupancy (or equivalent), issued by the authority having jurisdiction. For repair projects, code compliance will be confirmed via Certificate(s) of Completion (or equivalent), as applicable, issued by the authority having jurisdiction. Certificate(s) of Completion issued for repair projects may vary, depending on the scope of work completed by the program.

## Construction

### Construction Standards

RRP requires that all rehabilitation, reconstruction, and elevation comply with Florida and County building codes. For additional information as it relates to the construction standards, please refer to the County’s standalone Housing Construction Standards.

*Table 6 - Link to Manatee County Housing Construction Standards*

File Name	File Link
Manatee County Housing Construction Standards	<a href="https://manateegis.maps.arcgis.com/sharing/rest/content/items/61c4ebc0c5264257a76dd9c6fd30a01a/data">https://manateegis.maps.arcgis.com/sharing/rest/content/items/61c4ebc0c5264257a76dd9c6fd30a01a/data</a>

### Elevation Standards

HUD’s elevation standards for CDBG-DR projects were significantly updated following the January 20, 2025, rescission of Executive Order 14030. However, the key shift came earlier via HUD’s FFRMS Final Rule, published on April 23, 2024. Despite the federal rescission, HUD proceeded with its own regulatory implementation, meaning FFRMS elevation standards would still apply to HUD-funded projects, including CDBG-DR.

HUD’s Final Rule amended 24 CFR Part 55 to require the following as it pertains to elevation:

- Elevation or floodproofing of all new construction and substantial rehabilitation located within the FFRMS floodplain
- Use of one of three approaches to define the floodplain:
  - Climate-Informed Science Approach (CISA) - preferred method using best-available hydrologic data
  - Freeboard Value Approach (FVA) - adds 2 feet (residential) or 3 feet (critical actions) above BFE
  - 0.2 Percent Annual Chance Flood (500-year floodplain) - for critical facilities

The RRP will follow HUD guidance to ensure all structures, as defined in 44 CFR 59.1, designed principally for residential use, and located in the one (1) percent annual (or 100-year) floodplain and 0.2 percent annual (or 500-year) floodplain, that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b)(11) and 24 CFR 55.2(b)(5), will be elevated with the lowest floor, including the basement, at least two (2) feet above the Base Flood Elevation (BFE). The program will order elevation certificates for construction projects where necessary to comply with HUD's guidance. The program will not engage in elevation activities as a standalone measure that is not connected to repair the damage caused by the 2024 Hurricanes.

## Eligible Construction Activities

GCs are only authorized to perform construction activities that are duly authorized by an approved RRP scope of work or via an approved change order. Applicant and tenant requests for upgrades, modifications, and/or additional work shall not be considered. Program scopes of work, including all items outlined in the bulleted list below are subject to RRP award caps.

Program scopes of work may include:

- **Rehabilitation work:** Rehabilitation work includes items required to complete repair or renovation of a portion of a home. Repair work is intended to repair storm damage and bring the items repaired into compliance with local building codes.
- **Reconstruction:** Reconstruction consists of the demolition, removal, and disposal of the storm damaged structure, followed by construction of a new home in substantially the same footprint as the storm-damaged home. Reconstruction work will be conducted in accordance with applicable building codes. Reconstructed homes are only offered in standard RRP floorplans. No custom designed homes are authorized.
- **MHU Replacement:** MHU Replacement consists of the demolition, removal, and disposal of the storm-damaged MHU, followed by installation of a new MHU in substantially the

same footprint as the storm-damaged MHU. MHUs provided by RRP must be HUD certified and will be installed in accordance with local building and zoning regulations. MHUs are offered in two (2)-, three (3)-, and four (4)-bedroom configurations, all with two (2) bathrooms. Single-wide and double-wide MHUs are offered. Replacement MHUs shall be selected by the RRP and contractor consistent with program guideline.

- **Site work:** Site work includes site-specific construction activities necessary to complete the projects that are not related to the structure itself. Site work includes activities such as flatwork, grading, septic tank repair/replacement, well repair/replacement, installation of sod, tree trimming or tree removal, etc.
- **Environmental Abatement:** Environmental abatement activities are those environmental activities identified by the RRP or the GC that must be addressed in order to deliver a decent, safe, and sanitary home. Environmental abatement activities may include items such as, but not limited to, LBP removal or mitigation or asbestos abatement. Costs of environmental clearance inspections are also allowable.
- **Historic Preservation:** Section 106 of the National Historic Preservation Act of 1966 (Public Law 89-665) requires that most federally-funded activities be subject to a historic preservation review and, depending on the outcome of that review, certain actions may be required to address historic preservation concerns. If the State Historic Preservation Office (SHPO) or other authority having jurisdiction over Section 106 requires specific construction or design measures to prevent an adverse effect to a historic or cultural resource, such activities may be included in the program scope of work.
- **Reasonable Accommodations:** Scopes of work for Applicants with duly approved reasonable accommodation requests will include items associated with the approved reasonable accommodation(s). Reasonable accommodations may include items such as: widened doorways, ramps, grab bars, etc. To be included in a program scope of work, the Applicant must have presented adequate documentation of a disability for the tenant household member, and the reasonable accommodations request form must be approved prior to construction start.
- **Essential Appliances:** Essential appliances, which include stove/range, oven, water heater, dishwasher, and refrigerator are included in the program scope of work for all reconstruction and replacement award types. Scopes of work for rehabilitation award types will include replacement of essential appliances, only if the essential appliances are damaged, in non-working order, or non-existent at the time of damage assessment. Appliances provided will be of standard, economy grade and energy efficient.
- **Smoke and Carbon Monoxide Detectors:** All project types will be equipped with smoke and carbon monoxide detectors, in accordance with local code requirements.

- **Mitigation Measures:** Measures to make homes more resilient in the face of future disasters such as, but not limited to, roof strapping or impact resistant glass, may be included in program scopes of work.

The above bulleted list is not intended to be an exhaustive or all-encompassing list. All construction work undertaken by GCs must be approved via an approved scope of work or duly authorized change order. Any work completed by GCs prior to RRP authorization is at the GC's own risk.

RRP does not offer like-for-like replacement of anything. All construction work completed by the program will be completed using standard builders' grade materials, regardless of prior materials. Applicant- and tenant-requested upgrades, additions, or modifications to construction scopes of work will not be considered. Applicants and tenants may not pay out of pocket for upgrades, additions, or modifications concurrent with program sponsored construction.

## Exacerbated Damages

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To the extent that damages resulting from the 2024 Hurricanes are exacerbated by circumstances beyond the Applicant's control before the repair or reconstruction of the hurricane-damaged structure is completed, RRP may fund the repair, reconstruction, or replacement of the damaged home.

As recovery from disasters is a long-term process and Applicant damages are calculated at a point in time, a subsequent change in an Applicant's circumstances can affect the value of unmet needs to an Applicant's property. Examples of circumstances beyond the Applicant's control include, but are not limited to subsequent disaster, vandalism, or fire.

For example, if an Applicant's home was damaged by the 2024 Hurricanes and a subsequent flood or other unforeseen event exacerbates the original 2024 Hurricanes damage before repairs to damages caused by the hurricane(s) could be completed, RRP may complete the rehabilitation, replacement, or reconstruction and address the unmet repair need as it currently exists up to RRP program caps for the approved type of assistance.

However, RRP may not provide assistance for activities that: (1) address a need arising solely from an event other than the 2024 Hurricanes; or (2) address a need that has been met in full. For example, if a home did not suffer damages from the 2024 Hurricanes, but later suffers damages from a subsequent event, RRP cannot provide assistance to rehabilitate, replace, or reconstruct the home.

If exacerbated damages make it impossible to determine damages from the 2024 Hurricanes through a damage inspection, the RRP may use third-party documentation or datasets, such as a FEMA award letter, to document storm damages.

## Construction Warranty

All construction work completed by the RRP will include warranty protections to ensure Applicants receive safe, quality repairs or reconstructions. Warranties for repair projects cover all program-repaired scope items. For example, if a repair project did not include scope of work related to structural repairs, mechanical, electrical, or plumbing, those warranties may not apply. If a Property Owner chooses to make modifications, additions, or to otherwise affect or alter any program-assisted item during the warranty period, the warranty will be void and the GC will not be responsible for any repairs. Warranty terms will vary by project type.

Property Owners are expected to perform routine maintenance and maintain adequate home insurance coverage as a condition of warranty coverage. Warranty issues must be reported within the coverage period and will be addressed according to the timelines outlined in the contractor's warranty letter.

The RRP will implement a formal warranty notification process through the system of record. Applicants will receive written reminders via the email address provided at the time of application, including a notice approximately one month prior to the expiration of their one-year warranty period. This notice ensures Property Owners are informed and have an opportunity to report any warranty issues within the coverage timeframe.

### Rehabilitation Projects

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Properties that receive rehabilitation assistance will be accompanied by a one (1)-year limited warranty provided by the contractor. This warranty covers workmanship and materials included in the RRP-approved scope of work. Property Owners should report any defects or issues to the assigned contractor within the warranty period.

### Reconstruction Projects

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Properties that are reconstructed will be accompanied by a one (1)-year limited warranty provided by the contractor covering all workmanship and materials. In addition, the contractor must provide a third-party extended warranty which includes:

- Two (2)-year mechanical systems warranty covering HVAC, plumbing, and electrical systems; and
- Ten (10)-year structural warranty covering foundation and major loadbearing components.

Copies of the third-party warranty documents will be provided to the Property Owner upon project completion.

### MHU Replacement Projects

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Replacement MHUs will be accompanied by a one (1)-year limited warranty provided by the contractor covering workmanship and materials related to the installation and setup of the unit.

## Construction Progress Inspections

All RRP construction projects must pass a 50 percent inspection and a final construction inspection. The goal of program inspections is to confirm that construction work is being completed in accordance with the RRP-approved scope of work and that work is of sufficient quality. Program inspectors are not municipal code inspectors and program inspections do not supersede required municipal code inspections.

GCs selected from the program's qualified contractor pool are responsible for coordinating municipal code inspections, as required by the authority having jurisdiction to close permits and/or obtain a certificate of occupancy or certificate(s) of completion (or equivalent). GCs must pass a 50 percent inspection before requesting a final inspection. The GC or GC's representative must be present at each inspection.

Items required to pass a 50 percent inspection and final inspection vary by award type and are outlined below. Inspections may fail due to incomplete work, a GC or GC's representative absence, or completed work deemed unsatisfactory in quality.

### Rehabilitation Award Type Inspections

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For a repair project to pass a 50 percent construction inspection, items totaling 50 percent or more of the dollar value of the scope of work must be completed. GCs may request a 50 percent inspection for a repair project when the GC believes the 50 percent threshold has been met or exceeded. GCs are required to provide photo documentation of work completed and enclosed, when applicable, for the item to pass. Examples of work that may be

completed and enclosed at the time of a 50 percent inspection include, but are not limited to:

- Use of green rock in wet areas that has been painted over;
- Installation of insulation in exterior walls that have sheet rock installed;
- Installation of new subfloor;
- Installation of new radiant barrier sheathing if conducting roof replacement;
- Completion of anti-microbial spray; or
- Installation of replaced plumbing supply/waste lines or valves located within walls.

To pass a final inspection, repair project types must be complete, with approval achieved, as evidenced by Certificate(s) of Completion (or equivalent), and as applicable, issued by the authority having jurisdiction. To pass a final inspection, the following must be complete and onsite at the time of program inspection:

- Certificate(s) of Completion (or equivalent), issued by an authority having jurisdiction on site for all permits issued for the project;
- All site work complete;
- Photos of any work complete and enclosed at the time of final inspection. Work complete and enclosed at final inspection may include, but is not limited to:
  - Use of green rock in wet areas that has been painted over;
  - Installation of insulation in exterior walls that have sheet rock installed;
  - Installation of new subfloor;
  - Installation of new radiant barrier sheathing if conducting roof replacement;
  - Completion of anti-microbial spray; or
  - Installation of replaced plumbing supply/waste lines or valves located within walls.
- All construction work included in the RRP-approved cost estimate and any duly authorized change orders is complete and of sufficient quality;
- All utilities are reconnected and functional;
- All essential appliances are properly installed and functioning as intended;
- If the program-assisted structure is in the 100-year floodplain or 500-year floodplain according to the effective Flood Insurance Rate Map (FIRM), a final elevation certificate showing the lowest finished floor is two (2) or more feet above the BFE;
- Warranty issued for one (1) year and warranty booklet present in the home; and
- If the home was built prior to 1978, a LBP clearance report is present.

## Reconstruction Award Type Inspections

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For a reconstruction project to pass a 50 percent inspection, all of the following items must be complete and onsite at the time of inspection. Walls are not to be enclosed at the time of the 50 percent inspection. The inspector must be able to view and inspect the interior of all walls.

- Damaged home has been demolished and debris from the damaged home has been removed from the site and disposed of at an accredited facility to accept such waste;
- Foundation is complete;
- Framing is complete and evidence of a passing municipal framing inspection is on site;
- Roof complete;
- Exterior siding complete;
- Windows installed; and
- Mechanical, electrical, and plumbing rough-ins complete, with evidence of a passing municipal inspection on site.

To pass a final inspection, reconstruction project types must be complete, with municipal approval achieved, as evidenced by a Certificate of Occupancy (or equivalent) issued by the authority having jurisdiction. To pass a final inspection, the following must be complete and onsite at the time of program inspection:

- Certificate of Occupancy on site;
- All site work complete, including final grading, flatwork, and sod installation;
- All construction complete and of good quality in accordance with RRP-approved floorplan, scope of work, and any duly authorized change orders
- Address numbers are installed on the front of the home;
- All utilities reconnected and functioning;
- All appliances properly installed and functioning as intended;
- If the program-assisted structure is in the 100-year or 500-year floodplain according to the effective FIRM, a final elevation certificate showing the lowest finished floor is two (2) or more feet above the BFE; and Warranty issued for one (1) year and warranty booklet present in the home.

## MHU Replacement Award Type Inspections

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For an MHU replacement project to pass a 50 percent inspection, all the following items must be complete and onsite at the time of inspection.

- Storm-damaged MHU has been demolished and removed from the property for disposal at an approved facility; and
- Replacement MHU has been delivered to the site.

To pass a final inspection, MHU replacement project types must be complete, with municipal approval achieved, as evidenced by a Certificate of Occupancy (or equivalent) issued by the authority having jurisdiction. To pass a final inspection, the following must be complete and onsite at the time of program inspection:

- Certificate of Occupancy on site;
- All site work complete, including final grading, flatwork, and sod installation;
- All construction complete and of good quality in accordance with RRP-approved floorplan, scope of work, and any duly authorized change orders;
- Address numbers are installed on the front of the home;
- All utilities reconnected and functioning;
- All essential appliances properly installed and functioning as intended;
- If the program-assisted structure is in the 100-year or 500-year floodplain according to the effective Flood Insurance Rate Map (FIRM), a final elevation certificate showing the lowest finished floor is two (2) or more feet above the Base Flood Elevation (BFE);
- Warranty issued for one (1) year and warranty booklet present in the home; and
- Title for the new MHU is issued in the Applicant's name.

## Applicant Responsibilities

For the RRP to be successful in assisting the Applicant, the Applicant and tenant must participate and comply with program timeframes, directives, and requests. RRP is a voluntary program and Applicants who do not wish to comply with all or some of their assigned responsibilities may opt to withdraw from the program at any time prior to construction start.

### Flood Insurance

Section 582 of the National Flood Insurance Reform Act of 1994, as amended, provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for repair, replacement, or restoration for damage to any personal, residential, or commercial property if that person at any time has received flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and subsequently having

failed to obtain and maintain flood insurance as required under applicable Federal law on such property.

This means that the County may not provide disaster assistance for the repair, replacement, or restoration to a person who has failed to meet these requirements.

To ensure compliance with Section 582(a) RRP staff must, to the best of its ability, (1) check to determine whether the Applicant at any time received Federal flood disaster assistance that required the Applicant to obtain and maintain flood insurance protection for the assisted property in accordance with the requirements of the Federal flood disaster assistance, but failed to do so; and, if (1) occurred, (2) that no CDBG-DR funds are used to make a payment (including any loan assistance payment) to the Applicant for repair, replacement, or restoration for flood damage to the assisted property in (1).

Section 582 mandates that the County must inform Applicants receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if they fail to do so. The requirement to maintain flood insurance shall apply during the life of the property, regardless of transfer of ownership of such property. A Covenant Agreement shall be executed with the County enforcing this requirement prior to receiving disaster assistance.

Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) mandates that flood insurance must be purchased for any property, assisted with HUD funding, within a SFHA. Therefore, assisted Applicants with structures located in a SFHA must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program.

Applicants with RRP assisted properties located within a 100-year or 500-year floodplain must submit proof of flood insurance prior to receiving keys to the assisted property. RRP may purchase flood insurance coverage for one year following provision of program assistance.

### Prohibition of Assistance for Lack of Flood Insurance Coverage

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Per Section III.B.11 of HUD's Revised Universal Notice, when a homeowner located in the 100-year or 500-year floodplain allows their flood insurance policy to lapse, it is assumed that the homeowner is unable to afford insurance and/or is accepting responsibility for future flood damage to the home. This provision applies to all CDBG-DR grantees, including

the County, and reinforces statutory requirements under the Flood Disaster Protection Act of 1973 and 24 CFR 58.6.

To ensure that adequate recovery resources are available to assist lower income homeowners who reside in a 100-year or 500-year floodplain but who are unlikely to be able to afford flood insurance, and in accordance with an alternative requirement established in 87 FR 6364 (February 3, 2022) and carries forward in the Revised Universal Notice, RRP is prohibited from providing assistance for the rehabilitation/reconstruction of a house, if:

- The combined household income is greater than either 120 percent of AMI or the national median;
- The property was located in a 100-year or 500-year floodplain at the time of the disaster; and
- The property owner did not obtain flood insurance on the storm-impacted property, even when the property owner was not otherwise required by law or regulation to obtain and maintain such insurance.

## Applicant Cooperation with the Program

Throughout the life of an Applicant's participation in the RRP – from submission through closeout of the application – the Applicant must participate and respond to requests from the program in a timely manner. At no point should a request from the program go unanswered for more than 30 calendar days.

RRP will send Applicants with outstanding requests from the program a Pending Action Notice to inform the Applicant of the outstanding request(s). The Pending Action Notice informs the Applicant that the program requires action from the Applicant to proceed and that if the Applicant does not complete the required action within 30 calendar days, the Applicant's case will be closed. Common outstanding requests include, but are not limited to:

- **Documentation:** The program requires documentation from the Applicant for multiple reasons and at multiple phases throughout the program. Documentation requests may be related to documents generated by the RRP that the Applicant must sign. Applicants must submit and/or sign requested documents in a timely manner.
- **Schedule:** Applicants must schedule and attend required appointments, inspections, or other required meetings in a timely manner. RRP will make reasonable attempts to coordinate schedules with Applicant availability. Applicants who refuse to schedule or attend required meetings or inspections may be sent a Pending Action Notice.

- **Tenant Moveout:** Tenants may be required to move out of the storm-impacted property within 30 calendar days of the pre-construction meeting so that construction may begin. Tenants who do not move out of the storm-impacted property in a timely manner will be sent a Pending Action Notice.
- **Site Clearance:** Applicants and/or tenants are required to clear the construction project site of excess debris and/or personal property within 30 calendar days of the pre-construction meeting. Applicants and/or tenants who do not clear the storm-impacted property site of debris and/or personal property in a timely manner will be sent a Pending Action Notice.

Applicants who do not take the required action(s) within 30 calendar days of the Pending Action Notice will have their applications closed. Applicants who require assistance, clarification, or an extension to the 30-day timeframe to resolve a pending action must request assistance within the 30-day window. Extensions to the 30-day window will be considered on a case-by-case basis.

## Applicant Responsiveness

The RRP will make reasonable attempts to contact Applicants to schedule meetings, collect documentation, or obtain other necessary information. If the program has made three (3) consecutive unsuccessful attempts to contact an Applicant with no follow up contact from the Applicant, the Applicant will be sent a Non-Responsive Notice. The Non-Responsive Notice provides contact information for the program, advises the Applicant of the next steps in the application process, and notifies the Applicant that they must contact the program or complete an action within fourteen (14) calendar days of the date of the letter. If the Applicant fails to contact the program or complete the action within the 14 days allowed, the application will be closed. Applicants who become non-responsive after construction activities have commenced may be subject to repay program funds expended on construction activities prior to the application being closed.

## Temporary Relocation During Construction Activities

In some cases, properties assisted by RRP must be vacant and empty of personal belongings during construction. Tenants must move out of the storm-impacted property and remove all personal belongings and derelict personal property on-site within 30 calendar days of the pre-construction meeting.

Lawful tenants of assisted properties who must relocate during program-sponsored construction activities may qualify for Temporary Relocation Assistance (TRA) under the

Uniform Relocation Act (URA). TRA is a federally required benefit triggered when tenants are temporarily displaced due to federally funded rehabilitation, reconstruction, or replacement activities. TRA is funded from the program's URA set-aside and will follow URA requirements regarding scope, duration, and reimbursement of reasonable out-of-pocket expenses.

The County will coordinate with all contractors, vendors, and departments to minimize the displacement of persons with disabilities. If displacement cannot be avoided, even temporarily, the County will collaborate with impacted individuals to determine necessary accommodations (e.g., an accessible temporary dwelling unit) and make reasonable efforts to provide them.

## Applicant Responsibilities During Construction

During the construction phase of the program, the Applicant has several ongoing responsibilities. The construction phase begins after a GC has been assigned and all necessary permits have been secured, and ends when the program-assisted home is returned to the Applicant's control. Applicant responsibilities during construction include:

- Tenants must vacate the storm-impacted property and remove all personal belongings from inside the structure and the surrounding area, as applicable.
  - RRP is not responsible for any damages to or loss of belongings during construction.
- Coordinate with assigned GC to sign any required permitting documents.
- Allow the GC and RRP representatives full access to the property. If reasonable and timely access to the property is denied by the Applicant, RRP may terminate the award and the Applicant may be subject to repay any program funds expended on the project.
- Allow inspections to be performed by RRP representatives and municipal code inspectors. If reasonable and timely access to the property is denied by the Applicant, RRP may terminate the award and the Applicant may be subject to repay any program funds expended on the project.
- Remove and/or secure any animals or pets that remain on property during construction. Animals will only be allowed to remain on property during construction if the GC confirms there is sufficient space and sufficient enclosure for the animals to remain on-site without interfering with construction work. If there is not enough space or if animal enclosures are not sufficient, animals must be removed from the property.
  - RRP will not cover costs associated with removal and/or boarding of animals during construction.
- Do not interfere with the project site. For safety reasons, Applicants should make best efforts to stay away from the storm-impacted property during construction.

## Affordability Period

By executing a Property Owner Grant Agreement, Applicants assisted under RRP agree to maintain ownership of all assisted units and rent the units at affordable rents to LMI tenants for the following affordability periods:

- **Rehabilitation Projects:** 10 years, amortized at 10 percent per year.
- **Reconstruction Projects:** 20 years, amortized at 5 percent per year.

Tenants may not have relation or be related to the Applicant or may cause a conflict of interest. Affordable rents are rents that do not exceed 60-80 percent Fair Market Rent Limits adjusted for the number of bedrooms in the unit, and location of the property or 30 percent of the adjusted gross income of household for renters below 60 percent AMI.<sup>3</sup> To demonstrate compliance during each year of the affordability period, it is the responsibility of the Applicant to obtain all required income documentation, verify tenant household income, and submit all documentation and the completed income verification to the County annually and/or when the unit(s) is leased to a new tenant(s). All units will be monitored by the County or the authority designated by the County on an annual basis to ensure that compliance is maintained.

If the property is sold, transferred, leased to a non-income qualified tenant, refinanced without permission, or otherwise fails to meet program requirements during the duration of the affordability period, the prorated balance of the mortgage will become due.

A mortgage and promissory note will be executed and recorded in the official records of Manatee County, Florida, before or at the time of closing. In addition, Applicants are responsible for obtaining and maintaining Homeowner's Insurance for the duration of the applicable affordability period specified above. Applicants must submit proof of insurance prior to receiving keys to the assisted property. Requests for subordination will be evaluated individually.

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<sup>3</sup> HUD updates HOME Rent limits annually. HOME rent limits are publicly available online at: <https://www.hudexchange.info/programs/home/home-rent-limits/>.

*Table 7 – Affordability Period for Rehabilitation Projects*

<b>Date of Compliance Breach</b>	<b>Repayment Amount</b>
Month 0 – Month 12	100% of grant award
Month 13 – Month 24	90% of grant award
Month 25 – Month 36	80% of grant award
Month 37 – Month 48	70% of grant award
Month 49 – Month 60	60% of grant award
Month 61-Month 72	50% of grant award
Month 73 – Month 84	40% of grant award
Month 85 – Month 96	30% of grant award
Month 97 – Month 108	20% of grant award
Month 109 – Month 120	10% of grant award
Month 120+	0% of grant award

*Table 8 – Affordability Period for Reconstruction Projects*

<b>Date of Compliance Breach</b>	<b>Repayment Amount</b>
Month 0 – Month 12	100% of grant award
Month 13 – Month 24	95% of grant award
Month 25 – Month 36	90% of grant award
Month 37 – Month 48	85% of grant award
Month 49 – Month 60	80% of grant award
Month 61 – Month 72	75% of grant award
Month 73 – Month 84	70% of grant award
Month 85 – Month 96	65% of grant award
Month 97 – Month 108	60% of grant award
Month 109 – Month 120	55% of grant award
Month 121 – Month 132	50% of grant award
Month 133 – Month 144	45% of grant award
Month 145 – Month 156	40% of grant award
Month 157 – Month 168	35% of grant award

Month 169 – Month 180	30% of grant award
Month 181 – Month 192	25% of grant award
Month 193 – Month 204	20% of grant award
Month 205 – Month 216	15% of grant award
Month 217 – Month 228	10% of grant award
Month 229 – Month 240	5% of grant award
Month 241+	0% of grant award

RRP may grant forgiveness of the compliance period and terms in the following extenuating circumstances:

If the Applicant dies during the compliance period, the terms of the compliance period are forgiven. Surviving family members or heirs are not responsible for upholding ownership requirements. In the case of joint tenancy and military deployment, the same terms apply to surviving family members.

If the Applicant is transferred or deployed due to military service for a period of time that would prevent him/her from upholding ownership and lease requirements, the Applicant is expected to notify the County of the deployment or transfer. Affordability period requirements will be forgiven upon notification by the Applicant to the County.

If the Applicant must be moved to a permanent healthcare facility or nursing home due to health conditions, the Property Owner or Property Owner’s designee is expected to notify Manatee County. Affordability period requirements will be forgiven upon notification by the Property Owner to the County.

If the Applicant must be moved to a permanent healthcare facility or nursing home due to health conditions, and such change makes it impossible or unduly burdensome for the applicant to continue to own or lease the assisted property, the Applicant or Applicant’s Designee is expected to notify the County. Compliance period requirements will be forgiven upon notification by the Applicant to the County.

Other circumstances which are beyond the Applicant’s control and prevent the Applicant from upholding ownership and lease requirements throughout the compliance period will be considered on a case-by-case basis.

## Recapture

Rare instances may arise where an Applicant must return all or part of the awarded funding to the RRP. The RRP is responsible for recapturing duplicative funds from Applicants or from Applicants who become non-compliant. All Applicant files will be reviewed and reconciled for accuracy to ensure DOB did not occur and that Applicants are in compliance with RRP requirements and federal guidelines. If an Applicant has been identified as receiving a potential overpayment, the RRP will document the amount and basis for the repayment in writing via a Repayment Notification.

Applicants who disagree with a repayment amount determined by RRP may appeal the determination within 30 calendar days of receipt of the Repayment Notification. If the Applicant's request is denied or there is failure on the part of the Applicant to contest within the allotted timeframe, the RRP will proceed with collecting the repayment amount. If the Applicant's request results in a revision of the award amount or eligibility, the Applicant will sign a revised Property Owner Grant Agreement which will outline the requirements related to such changes and the requirements for repaying the remaining overdue amount, if any.

Once it has been determined that the Applicant must return funds to the County, the Applicant must repay their funds within the negotiated time period approved by the County. All repayments shall be expected to be repaid in full as one lump sum amount. The RRP will review any Applicant claims of financial hardship and may make limited accommodations in some cases. All funds recovered because of this policy will be tracked in the Disaster Recovery Grant Reporting system (DRGR) and returned to the CDBG-DR account or U.S. Treasury if the CDBG-DR grant has been closed out.

## Voluntary Withdrawal

An Applicant may request to withdraw from the RRP at any time before construction begins. While voluntary withdrawal after execution of a Property Owner Grant Agreement is discouraged, as construction activities may have begun, any request to withdraw after a Property Owner Grant Agreement has been signed will require a formal in-writing withdrawal request, and will be evaluated on a case-by-case basis. Applicants may be liable for any expenses incurred if withdrawing from the RFP after execution of the Property Owner Grant Agreement. This includes, but is not limited to, costs associated with tenant relocation (i.e., URA), permitting, and construction.

Applicants may indicate a desire to withdraw to any RRP representative and will be directed to sign and complete a withdrawal request form. After an Applicant requests to withdraw, they will be sent a Voluntary Withdrawal Notice. The Voluntary Withdrawal Notice informs the Applicant that RRP has received their request to withdraw, and that the Applicant has 14 calendar days from the date of the letter to rescind the withdrawal request. If the Applicant does not rescind the voluntary withdrawal request within the 14-day period, the Applicant's case will be closed as withdrawn.

## Closeout

Projects will be closed upon completion of construction work, return of keys to the Applicant, and confirmation that the home has been leased to a LMI household. RRP 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.

## Conflict of Interest

A conflict of interest exists when any person in a decision-making position possesses internal knowledge of CDBG-DR activities and may obtain personal benefit from such activities. Pursuant to 24 CFR 570.611, conflict-of-interest covered persons may include Public Servant(s), including any employee(s), agent(s), consultant(s), officer(s), elected/appointed official of Manatee County, or, of any designated public agencies, or subrecipients that are:

- Administering or implementing activities/responsibilities under CDBG-DR;
- Participating in decision-making;
- Has inside information; or
- Receiving funds under the CDBG-DR Program and may obtain a financial or personal interest or benefit that is or could be reasonably incompatible with the public interest, either for themselves or a member of their family during their tenure.

For purposes of this section, “family” includes any of the following of an official covered under the CDBG conflict of interest regulations at 24 CFR 570.611:

- Spouses;
- Parents (including mother-in-law and father-in-law);
- Grandparents;
- Grandchildren;
- Siblings (including sister-in-law and brother-in-law); or
- Children.

Public servants should not get involved in matters where they have a conflict of interest that could benefit them. This also applies to their family members, relatives, partners, or housemates. However, this does not automatically prevent Manatee County or RRP Program officials, their employees, or family members from receiving assistance from the Program. They may still apply for assistance if they meet all eligibility criteria and it’s determined that no conflict of interest exists.

Applicants must disclose any relationship with public servants when they apply. RRP will assess these relationships to see if they create a conflict of interest. If a conflict is found, the applicant will not be eligible for assistance from RRP.

## Fraud, Waste, and Abuse Prevention

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 detail 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 8 and 9 below.

*Table 9 – 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 10 – 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), RRP 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, RRP 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 RRP 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, RRP 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 an RRP determination may request an initial appeal directly with the RRP 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 determination;
- DOB Gap determination;
- Award Type Determination;
- Program Scope of Work; 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: [www.lastingmanatee.org/pages/contact](http://www.lastingmanatee.org/pages/contact)
- 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 RRP 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 RRP, it should not be considered exhaustive instructions for every potential scenario that may be encountered. At times, exception 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.

## Uniform Relocation Assistance and Real Property Acquisition Act

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 RRP, are subject to URA regulations.

If an RRP-assisted property is currently occupied by rental tenant(s), the displacement of such tenants will result in the application of the URA and all associated requirements, restrictions, and/or waivers outlined in the governing Federal Register Notice(s), federal guidance, and the URA itself. Once the structure is rehabilitated or reconstructed, the tenant(s) will have the opportunity to move back into the previously-occupied structure that was rehabilitated or reconstructed using CDBG-DR funds.

For more information, see the *Manatee County Uniform Relocation Assistance Policy Manual* and *Residential Anti-Displacement and Relocation Assistance Plan* on the County's CDBG-DR website at: [www.lastingmanatee.org/pages/documents](http://www.lastingmanatee.org/pages/documents).

## 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 covers 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.