



CDBG-DR Infrastructure & Public Facilities Program Manual

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1. Version History

Version Number	Change Date	Summary of Changes
1.0	2/5/2024	Original version published
1.1	3/14/2024	Added language in 2.1 about the exceptions process to established policies. exceptions to the established policies. Minor and non-substantive edits made throughout for clarification.

2. Program Overview

2.1 Introduction

In alignment with Sarasota County’s comprehensive approach to resilient recovery from Hurricane Ian, Sarasota County is launching Resilient SRQ Infrastructure and Public Facilities Program, funded by the Community Development Block Grant–Disaster Recovery (CDBG-DR), to support in replacing and rebuilding what was damaged or lost during the disaster event, as well as implement mitigation measures.

Sarasota County will award CDBG-DR funds to Sarasota County public entities and non-profits throughout the County to complete recovery activities, which may include but are not limited to improvements to community water and sewer systems, mitigation activities, restoring or improving roads and bridges, and repairing and restoring public facilities.

CDBG-DR grants are allocated to States and local jurisdictions by the U.S. Department of Housing and Urban Development (HUD) and are intended to address “unmet needs” not satisfied by other federal or local recovery resources.

The purpose of this program manual is to provide the overall objectives and process by which Sarasota County will award CDBG-DR funds to eligible public entities and non-profit organizations, prioritizing projects that provide the essential public infrastructure in low- to moderate-income (LMI) and historically underserved communities.

Circumstances may arise that require exceptions to the established policies. In such cases, the Board of County Commissioners or their designee can make exceptions to the policies outlined in this Program Manual. The County is committed to upholding the principles and objectives of the policies outlined in this manual, while also providing the flexibility needed to address unique or unforeseen circumstances in a manner that serves the best interest of the community.

2.2 Program Description

The Infrastructure and Public Facilities Program is a grant program that provides funding for unmet recovery and mitigation needs for infrastructure and public facilities. The damage to infrastructure and public facilities was shared by Sarasota County, public entities, and non-profits. In order to ensure an efficient and coordinated distribution of funds for infrastructure and public facilities, Sarasota County will administer the grant award process and review and allocate funds for infrastructure and public facilities projects awarded by Sarasota County. Projects awarded are to be undertaken by Sarasota County public entities, and non-profits.

2.3 Program Objectives

The Infrastructure and Public Facilities program is designed to promote sound, sustainable long-term recovery, and resiliency from natural disasters. Approved projects will require construction standards that support long term sustainability and resilience against future disasters.

2.4 Funding Sources

The U.S. Department of Housing and Urban Development (HUD) announced that Sarasota County will receive \$201,535,000 in funding to support long-term recovery efforts following impacts from Hurricane Ian in 2022 through the Continuing Appropriations Act, 2023 (Pub. L. 117–180, Division A) approved September 30, 2022, and the Department of Housing and Urban Development Appropriations Act, 2023 (Pub. L. 117–328, Division L, Title II) approved December 29, 2022, for major disasters occurring in 2022. Community Development Block Grant – Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted.

HUD has allocated *\$201,535,000 in CDBG-DR funds to Sarasota County in response to Hurricane Ian*, DR-4673-FL, through the publication of the Federal Register, 88 Fed. Reg. 32,046 (May 18, 2023) <https://www.govinfo.gov/content/pkg/FR-2023-05-18/pdf/2023-10598.pdf>. This allocation was made available through Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.)

2.5 CDBG-DR Eligibility Criteria

2.5.1 HUD Criteria

HUD criteria has three main components which are meeting a national objective, being an eligible activity, and meeting an unmet need tied to the disaster, unless it is a mitigation activity which does not need to be tied to the disaster. The minimum required eligibility criteria are outlined in the application for public entities and non-profits within Sarasota County.

2.5.2 National Objectives

Each project funded through this program must meet at least one of HUD’s National Objectives:

- Benefit to LMI persons;
- Aid in the prevention or elimination of slums or blight; and
- Meet a need having a particular urgency (referred to as urgent need)

Urgent need activities alleviate or prevent the conditions which “pose a serious and immediate threat to the health or welfare of the community”. National Objectives for projects will be determined on a case-by-case basis.

2.5.3 Eligible Applicants

CDBG-DR funds can be provided to the following groups:

- Non-profits within Sarasota County registered as a 501(c)(3) or (4) providing public services to Sarasota County residents.
- Public entities with public facilities or infrastructure needs within Sarasota County.

2.5.4 Eligible Activities

Most of the CDBG-DR appropriations under this program require funds to be used for necessary expenses for activities related to disaster relief, long-term recovery, and restoration of infrastructure in the most impacted and distressed areas. Generally, activities that rebuild or replace affected public facilities or improvements. Typical activities include but are not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system;
- Restoration of infrastructure (such as water and sewer facilities, streets, provision of permanent generators, bridges, etc.);
- Demolition, rehabilitation, or construction of programmatically eligible public or semi-public facilities (such as fire stations, shelters, food banks);
- Acquisition (easement, right-of-way [ROW]) following Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA); or,
- Rehabilitation of schools, health care centers, water or wastewater facilities, drainage improvements and the like.

2.5.5 Mitigation Set Aside Activities

The Disaster Relief Supplemental Appropriations Act of 2021 requires HUD to set aside 15% of any disaster recovery grant for disaster mitigation activities. Unlike recovery activities that “tie-back” to the specific disaster and address a specific unmet recovery need for which the CDBG-DR funds were appropriated, activities funded by the CDBG-DR mitigation set-aside do not require such a tie-back to the specific qualified disaster. Mitigation projects funded under this program must meet the definition of mitigation as specified in section IV.A.2. of 88 FR 32046, which is “those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.”

Such mitigation set-aside activities must:

- Meet HUD’s definition of mitigation activities.
- Address the current and future risks as identified in the Mitigation Needs Assessment.
- Be at least one of the CDBG-DR eligible activities.
- Meet at least one of HUD’s national objectives.

3. Application and Selection Process

3.1 Administrative Framework

Sarasota County will be responsible for collecting, reviewing, and approving all Infrastructure and Public Facilities Program applications. Sarasota County departments are eligible to benefit and receive awarded funds. External applicants who are awarded funds are subrecipients of the Sarasota County CDBG-DR grant and are responsible for the implementation and timely completion of the projects. Subrecipients must adhere to the federal, state, and local requirements applicable to these grant funds. Sarasota County will provide training and technical assistance to approved applicants. Throughout the project, Sarasota County will monitor approved projects and provide oversight to maintain compliance and ensure their successful completion.

3.2 Application Process

Eligible Applicants can submit applications for proposed projects during the established application window as specified on the [Resilient SRQ](http://www.scgov.net/ResilientSRQ) webpage (www.scgov.net/ResilientSRQ). Resilient SRQ County staff will conduct a comprehensive assessment of the proposals, carefully considering the feasibility, cost-effectiveness, and sustainability of each project. The County will evaluate proposed projects submitted by applicants based on criteria specified in Section 3.4 of this Program Manual. County staff will present the potential projects to the Sarasota County Board of County Commissioners, who will review the project evaluation recommendations during a public meeting. The Board of County Commissioners will make the final project selection. Throughout the process, transparency and accountability will be maintained by providing regular updates to the public through the [Resilient SRQ](http://www.scgov.net/ResilientSRQ) (www.scgov.net/ResilientSRQ) webpage and notifying applicants and community members.

3.2.1 Outreach and Program Promotion

Sarasota County will release a public notice announcing the program and funds available, and a request for applications through the following platforms:

- Social media
- Website
- Press release to local news sources
- Other public channels

Sarasota County will conduct information sessions regarding Resilient SRQ Infrastructure and Public Facilities Programs to provide an overview of the program goals and objectives and the application and scoring process. Staff will remain available to answer questions throughout the process and potential applicants will have an opportunity to ask questions and/or discuss issues specific to their project and the application process.

Throughout the entire application cycle, technical assistance also is available by sending inquiries to resilientsrq@scgov.net. Resilient SRQ Staff will respond to all inquiries in a timely manner.

3.2.2 Application Window

Applications opened February 5, 2024 12:00 PM EST and are currently scheduled to close March 18, 2024 11:59 PM EST. Non-Profit pre-applications are due March 12, 2024 11:59 PM EST. Any change to the dates and time will be reflected on the [Resilient SRQ](http://www.scgov.net/ResilientSRQ) website. Applications must be completed and submitted before the deadline to be considered for funding.

3.2.3 Clarifications

The County reserves the right to clarify or request additional information at any time from applicants. Applicants shall respond within the timeframe specified in the County's request to remain eligible for Resilient SRQ funding.

3.3 Summary of Application Requirements

3.3.1 Non-Profit Application Submission Requirements

Non-profit applicants will complete a brief pre-application about the proposed project to determine if the project is eligible to be considered for funding. Resilient SRQ staff will review the pre-application to determine if the project is eligible. Applicants will be notified of the determination of their pre-application. If a project is deemed eligible, the applicant will be invited to complete a more detailed application. The detailed application will include questions regarding information about the project including project

details, financial resources and planned use of CDBG-DR funds, project impact, mitigation measures, and dedicated project resources to ensure compliance with federal, state, and local regulations.

3.3.2 Sarasota County Public Entity Submission Requirements

Public entity applicants will complete a detailed application. The detailed application will include questions regarding information about the project including project details, financial resources and planned use of CDBG-DR funds, project impact, mitigation measures, and dedicated project resources to ensure compliance with federal, state, and local regulations.

3.3.3 Disadvantaged Communities

The Infrastructure and Public Facilities program application includes questions that help ensure vulnerable populations and underserved communities are not negatively impacted by the proposed project. Applications must address the extent to which the project benefits such populations and underserved communities.

3.3.4 Minimum and Maximum Awards

There are no minimum or maximum awards under this program.

3.4 Scoring Criteria

Once a project is presumed eligible, the project will be reviewed by Resilient SRQ staff, and a recommended score will be provided to the Board of County Commissioners for final determination on projects to be selected for award. Applications will be reviewed, and scores will be recommended in accordance with the tables below.

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3.4.1 Non-Profit Scoring Criteria

Minimum Eligibility Criteria (Non-Profits)

Applicants must meet all of the minimum eligibility criteria listed below to be considered for CDBG-DR funding.

1. Proposed project serves low to moderate income clientele (LMC) in accordance with the United States Department of Housing and Urban Development (HUD) Low to Moderate Income National Objective.
2. The proposed project must be an eligible activity. Eligible activities include:
 - Demolition, rehabilitation, or construction of programmatically eligible public or semi-public facilities (such as, shelters, food banks);
 - Acquisition following Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).
3. Project has a direct or indirect tie back to Hurricane Ian.
4. Project includes mitigation measures.

Scoring Criteria (Non-Profits)

Criteria Category	Description	Points Available
Financial Plan	<ul style="list-style-type: none"> • Applicant has not demonstrated reasonable steps to secure adequate funding for project – 0 points OR • Applicant has demonstrated reasonable steps to secure adequate funding for project – 10 points OR • All funds needed to complete this project have been accounted for with exception of funds requested from Resilient S-Q - 20 points 	0, 10, or 20
Leverage of Funding	<ul style="list-style-type: none"> • CDBG-DR funding would cover 76-100% percent of project costs - 0 pts OR • CDBG-DR funding would cover 51-75% percent of project costs -10 pts OR • CDBG-DR funding would cover 1-50% percent of project costs -20 pts 	0, 10, or 20
Project Readiness	Level of planning that remains and demonstrated ability to complete the project within five years.	0-20
Project Impact	Project benefits the community and has demonstrated a reasonable cost benefit analysis that is proportional to their requested amount.	0-20
Pre-Award Assessment	Resources and experience to successfully complete the project and maintain compliance with federal, local, and state regulations.	0-20
Total Maximum Points Available (Non-Profits)		100

3.4.2 Public Entity Scoring Criteria

Minimum Eligibility Criteria (Public Entities)		
Applicants must meet all of the minimum eligibility criteria listed below to be considered for CDBG-DR funding.		
5. Proposed project benefits low to moderate income (LMI) persons, preventing or eliminating slums or blight, or urgent need in accordance with the United States Department of Housing and Urban Development (HUD) National Objectives.		
6. The proposed project must be an eligible activity. Eligible activities include: <ul style="list-style-type: none"> • Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system; • Restoration of infrastructure (such as water and sewer facilities, streets, provision of permanent generators, bridges, etc.); • Demolition, rehabilitation, or construction of programmatically eligible public or semi-public facilities (such as fire stations, shelters, food banks); • Acquisition (easement, right-of-way [ROW]) following Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). 		
7. Project includes mitigation measures.		
Scoring Criteria (Public Entities)		
Criteria Category	Description	Points Available
LMI National Objective	<ul style="list-style-type: none"> • Project does not meet LMI National Objective- 0 points OR • Project service area is located in a Low to Moderate Income Area, the beneficiaries of an activity serve a Low to Moderate Income Clientele, or the activity results in the job creation or retention for Low to Moderate Income Persons - 25 points 	0 or 25
Financial Plan	<ul style="list-style-type: none"> • Applicant has not demonstrated reasonable steps to secure adequate funding for project – 0 points OR • Applicant has demonstrated reasonable steps to secure adequate funding for project – 10 points OR • All funds needed to complete this project have been accounted for with exception of funds requested from Resilient SRQ - 15 points 	0, 10, or 15
Leverage of Funding	<ul style="list-style-type: none"> • CDBG-DR funding would cover 76-100% percent of project costs – 0 pts OR • CDBG-DR funding would cover 51-75% percent of project costs – 10 pts OR • CDBG-DR funding would cover 1-50% percent of project costs – 15 pts 	0, 10, or 15
Project Readiness	Level of planning that remains and demonstrated ability to complete the project within five years.	0-15
Project Impact	Project benefits the community and has demonstrated a reasonable cost benefit analysis that is proportional to their requested amount.	0-20
Project Tieback	Project is a Mitigation project with no tie back to Hurricane Ian – 5 pts OR Project has a direct or indirect tie back to Hurricane Ian – 10 pts	5 or 10
Total Maximum Points Available (Public Entities)		100

3.5 Notice of Award

Sarasota County may fund all or a portion of the total requested funding. All applications and recommended scores will be provided to the Board of County Commissioners for their review and final selection of projects. Once award amounts are determined, Sarasota County will notify all applicants on final determination award. Projects selected for award by the County Commission will be required to execute a subrecipient agreement with exception of internal county departments. Internal county department awarded projects will be administered directly by the department with oversight and assistance from program staff and grants administration. A draft of the subrecipient agreement is available on the [Resilient SRQ](#) website. Execution of a grant is contingent upon both parties' agreement regarding the terms and conditions, including but not limited to, the project scope, budget (e.g., State, and federal construction and financial rules and regulations), and timeliness. Awards will be considered final upon execution of the subrecipient agreement between Sarasota County and the Applicant.

3.6 Negotiation

Sarasota County reserves the right to negotiate funding amounts and payment schedules with awarded applicants. On a case-by-case basis, negotiations may be appropriate for, but not limited to, situations such as the demand exceeding the amount of funds available, the existence of project readiness issues, and discrete project components meeting program objectives or grant requirements, such as the LMI benefit.

4. Grant Management

4.1 Subrecipient Environmental Reviews

It will be the responsibility of Sarasota County to orchestrate Environmental Reviews. In the event an environmental review concludes site conditions are deemed unacceptable, the award will be rescinded. "Unacceptable" sites include, without limitation, those containing an immitigable environmental factor that may adversely affect the health and safety of the residents.

NOTE: There can be no choice-limiting actions on the part of the developer/owner until environmental clearance is received, and a Notice to Proceed is issued. The concept of prohibiting "choice-limiting" actions is to prevent the developer from investing in a project before all necessary environmental clearances are obtained. Market studies, environmental studies, plan development, engineering or design costs, inspections and tests are not considered "choice-limiting" actions.

"Choice-limiting actions" are defined as any activity that would have an adverse environmental impact or limit the choice of reasonable alternatives, such as acquisition by the developer/owner (or any subsidiary of the developer), construction, demolition of buildings, or rehabilitation or reconstruction of buildings.

Per 24 CFR Part 58.22, failure to comply with the prohibition against committing funds or taking physical action (using either HUD funds or non-HUD funds) before the completion of the environmental review process could result in loss of HUD assistance, cancellation of the project, reimbursement by the developer/owner to HUD for the amount expended, or suspension of the disbursement of funds for the affected activity.

4.2 Subrecipient Agreements

The Subrecipient Agreement will outline the conditions of the CDBG-DR funding for the approved project. The subrecipient agreement terms may include, but not limited to:

- Project Name
- Award amount
- Scope of Services
- Performance Monitoring & Reporting
- Period of performance and term
- Budget
- Payment
- Program Requirement & Award Conditions
 - Tie-back to disaster, if applicable
 - Eligible Activity and National Objective
 - Environmental Review (24 CFR, Part 58)
 - Evidence of commitment of leverage funds
 - Approved Procurement Policy
 - Conflict of Interest
 - Fraud, Waste, & Abuse Policy
 - Anti-Displacement and Relocation Plan
 - Cross-Cutting Compliance
 - Fair Housing and Civil Rights Law
 - Labor Standards
 - Section 3
- Termination
- Other requirements

4.3 Subrecipient Agreement Amendments

The County reserves the right to amend Subrecipient Agreements at any time. Subrecipients may request an amendment to extend period of performance, amend budgets, change the scope of work, or update project milestones. The County will review the amendment request and determine if the amendment is warranted. Subrecipients are encouraged to submit the request to amend as soon as the need is identified. Requests to amend the Subrecipient Agreement must be submitted within a reasonable timeframe.

4.4 Payment Method and Process

Funding will be provided to Subrecipients on a cost reimbursement basis based on actual expenditure and percentage of project completion.

4.4.1 Payment Conditions

The subrecipient must complete all conditions specified in the subrecipient agreement before requesting payment. Upon execution of the subrecipient agreement, the subrecipient may proceed with implementation of the project. Conditions may include but not limited to the following:

- Requirements outlined in the Subrecipient Agreement
- Procurement documentation
- Contracts documentation
- Insurance and bonding documentation

4.4.2 Supporting Documentation

Subrecipients must verify all costs before submitting invoices to the County for reimbursement and provide all required reporting and supporting documentation (e.g., detailed invoices, purchase order, proof of services, and paid itemized receipt) requested by the County. At a minimum, the supporting documentation should include:

- Vendor name and contact information
- Invoice number
- Invoice date
- Date of service
- Services performed
- Amount due

Additional documentation may be requested at any time before payments can be made.

4.4.3 Payment Requests

The subrecipient is responsible for billing the County for invoiced costs, the County will review the invoices to ensure all required information is included to pay the subrecipient. Payment requests must be submitted no more than monthly. Before submitting a payment request, the Subrecipient must verify the invoices are accurate and complete, the activities and costs were incurred during the period of performance, and all required supporting documentation is included in the payment request. Payment requests that do not include the required information or supporting documentation will be rejected and returned to the subrecipient to collect the necessary information and resubmit.

4.4.4 Payment Monitoring and Reconciliation

The County will monitor payment requests and reconcile any issues that may arise as a result. The quality assurance/quality control process will involve the following:

- Documentation reviews and data collection during the payment review process.
- Program monitoring to ensure that activities are within program guidelines.
- Program expenditure and payment request review for eligibility based on applicable laws, CDBG-DR requirements, and CDBG regulations.
- Follow-ups regarding identified compliance issues, initiation of corrective actions, and implementation of program controls, as necessary.

4.5 Eligible and Ineligible Costs

4.5.1 Eligible Costs

Beyond eligible activities described in this Program Manual, the program will make use of 2 CFR Part 200, Subpart E (Cost Principles), to understand what costs can be incurred through the CDBG-DR grant. Each cost should adhere to accounting principles, be necessary and reasonable for the performance of the grant award, be consistent with policies and procedures, and be adequately documented.

4.5.2 Ineligible Costs

Ineligible activities are defined in 24 CFR 570.207, these include, but are not limited to, buildings or portions thereof used for conduct of government; general government expenses; political activities; purchase of equipment (except as provided for in 24 CFR 570.201(c)); operating and maintenance expenses; and income payments.

4.6 Duplication of Benefits (DOB) Review

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act prohibits any person, business, or other entity from receiving duplicative financial assistance for the same disaster recovery purpose from multiple sources of federal and other support (42 United States Code [U.S.C.] 5155(a) and (c)). Duplication occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular disaster recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need.

In accordance with CDBG-DR regulations, the program's subrecipients are required to disclose all other benefits (e.g., cash, in-kind, grants, loans) received, or which will be received for the proposed project to ensure that federal funds do not duplicate funds received from other sources. In the event DOB occurs, the subrecipient shall be required to return the funds to the County in accordance with Section 4.9 of this Program Manual. Typical sources of duplicated benefits for infrastructure can include, but are not limited to, the following:

- Federal Emergency Management Agency (FEMA) Public Assistance
- FEMA Hazard Mitigation Grant Program
- FEMA National Flood Insurance Program
- FEMA Increased Cost of Compliance Benefits
- U.S. Army Corps of Engineers
- Commercial insurance
- Insurance and personal property replacement
- Forced mortgage payoffs
- Philanthropic cash assistance
- Some subsidized loans

4.7 Cost Reasonableness Evaluation

Projects funded under this program must be considered necessary and reasonable. Costs are considered reasonable if, in their nature and amount, they do not exceed that which would be incurred by a prudent person in the conduct of competitive business. Analytical techniques and procedures may be used to ensure that final costs are fair and reasonable, such as a cost analysis detailing the individual cost elements of projects to certify elements such as necessity, pricing, and consistency.

4.8 Program Income

Sarasota County does not anticipate any program income generated by the CDBG-DR program. If program income is generated, Sarasota County will account for and manage utilizing separate account established within financial reporting systems and controls already established. County will follow requirements as provided under 88 FR 32046.

“Program income” is defined as gross income generated from the use of CDBG-DR funds, except as provided in III.E.1.b. under 88 FR 32046 and received by Sarasota County or a subrecipient. Income

received before or after grant closeout that generated program income, is considered CDBG-DR funds and subject to the requirements in the Consolidated Notice and the Action Plan.

4.9 Recapture of Funds

The subrecipient is required to notify the County immediately, in writing, in the event any future payments that they may receive after the award amount creates a DOB. The County will determine whether the funds received are duplicative. If the funds received are deemed duplicative, the subrecipient is required to return the funds to the County.

4.10 Timely Expenditures and Project Completion

The County expects to complete program activities as quickly as possible to address the unmet infrastructure need. The County is required by HUD to disburse CDBG-DR funding allocated through this program to be disbursed within 6 years unless HUD grants an extension. However, the awarded project must be completed within the period of performance as specified in the subrecipient agreement unless an executed amendment to the subrecipient agreement allows for additional time.

4.11 Records

Subrecipients must retain all CDBG-DR records for a minimum of five (5) years after closeout of the subrecipient agreement. In addition, subrecipients must provide access to the County, HUD, the Comptroller General of the United States, or other authorized governmental agencies to any pertinent records for purposes of monitoring and to make audits, examinations, excerpts, and transcripts (2 CFR 200.337).

Consistent with applicable state and local laws regarding privacy and obligations of confidentiality, subrecipients must also provide citizens with reasonable access to records on the past use of CDBG-DR funds (24 CFR 570.508 and 2 CFR 200.338).

4.12 Reporting

The County will report to HUD on a quarterly basis, however subrecipients will be required to provide a monthly performance report that details the activities completed in the previous month. These reports will be aggregated and used to provide HUD with a report on grant progress. The reports will include, at a minimum:

- Narrative of the activities completed during the quarter.
- Financial metrics that demonstrate costs incurred to date and projected future spending.
- Documentation showing total number of beneficiaries served or accomplishments completed.
- Section 3 reporting on total labor hours and target labor hours.
- Data in accordance with Federal Funding Accountability and Transparency Act (FFATA) guidelines

In addition to those listed above, the subrecipient shall also include mitigation measures and resilience performance metrics as described in the subsections below in their monthly performance report.

4.12.1 Mitigation Measures

Mitigation measures help ensure that communities are more resilient to the impacts of recurring natural disasters and climate change. Examples of mitigation measure include:

- Incorporating resilient construction standards
- Using resilient building materials and technology
- Elevating facilities above the Base Flood Elevation (BFE)

- Buyout/Acquisition of properties
- Utilization of backup power for critical facilities
- Integration of open space or use of nature to manage flooding

When determining which mitigation measures to incorporate, subrecipients should design and construct structures to withstand existing and future climate impacts expected to occur over the service life of the project.

4.12.2 Resilience Performance Metrics

Before carrying out CDBG–DR funded activities to construct, reconstruct, or rehabilitate residential or non-residential structures, subrecipients must establish resilience performance metrics for the activity.

The process for developing resilience performance metrics includes:

1. An estimate of the projected risk to the completed activity from natural hazards, including those hazards that are influenced by climate change (e.g., high winds destroying newly built homes),
2. Identification of the mitigation measures that will address the projected risks (e.g., using building materials that are able to withstand high winds), and
3. An assessment of the benefit of the mitigation measures through verifiable data (e.g., 10 newly built homes will withstand high winds up to 100 mph).

In Disaster Recovery Grant Reporting (DRGR) system, HUD has published specific measures for mitigation activities such as the number of non-residential buildings constructed, number of fewer outages of critical facilities and utilities, number of linear feet of public improvement, number of public facilities, number of residents protected from future flooding, and number of plans or planning products developed. Examples of other resilience performance metrics include:

- Number of acres no longer vulnerable to flood events
- Number of floodplain design standards updated
- Number of properties with access above 100 year or 500-year flood level
- Number of linear feet/miles of public improvement
- Number of public facilities constructed or reconstructed
- Number of residents protected from future flooding

4.13 Monitoring and Compliance

The County is required to provide oversight and monitoring of its subrecipients and internal county departments. Oversight will include ongoing generic reviews, and monitoring will include targeted area-focused reviews of administrative, financial, performance, reporting, and compliance with applicable federal crosscutting requirements. The objective of the oversight and monitoring activities is to facilitate the achievement of performance goals while ensuring that subaward funds are used for authorized purposes in compliance with Federal statutes, regulations, and the terms and conditions of the subaward.

The subrecipient shall ensure that all records and files pertaining to the project, as well as any additional information requested by the County, is made available at the monitoring visit or at the time specified by the County. The County may request a visit to the project site as part of the monitoring visit.

The County will notify subrecipients of monitoring events in advance. In response to subrecipient monitoring, the County will provide technical assistance to mitigate identified risks and to address concerns and findings. Monitoring will be conducted based on risk. At a minimum, subrecipients will be

monitored at least once annually. The County will determine the frequency of monitoring with each subrecipient and reserves the right to change the frequency at any time at the County's discretion. The County will use monitoring checklists to ensure consistency and to provide a detailed record.

Each monitoring will address project-specific issues and may be carried out through a combination of desk review, remote monitoring, and/or on-site monitoring. The primary goals of monitoring are to:

1. Review activity eligibility and achievement of national objectives;
2. Evaluate conformance to the subrecipient agreement;
3. Ensure compliance with CDBG-DR program and all other applicable federal, state, and County requirements, including, but not limited to appropriate insurance coverage, assessment management processes, procurement procedures, conflicts of interest disclosures, and fair housing and civil rights compliance;
4. Review and ensure accuracy and completeness of record keeping and financial management systems;
5. Evaluate organizational, program and project performance, as well as on-going project viability (financial health, management capacity, etc.);
6. Design any corrective actions necessary to improve or reinforce performance; and
7. Identify the technical assistance needs of CDBG-DR subrecipients.

Upon completion of a monitoring, the County will provide a monitoring letter to each subrecipient outlining the results of the monitoring. If corrective actions are needed as a result of findings or concerns, a corrective action plan will be included with the letter. The subrecipient will be provided the opportunity to respond to the monitoring results, and County staff will work collaboratively with the subrecipient to resolve any findings or concerns.

5. CDBG-DR Requirements

5.1 Cross-Cutting Requirements

5.1.1 Environmental Review and Historic Preservation

Environmental and historic preservation compliance reviews must be completed before any work can begin on a project following CDBG-DR award. CDBG-DR appropriation acts prohibit HUD from waiving these requirements. The County will work with the subrecipient to ensure completion of the reviews.

5.1.2 URA, Section 104(d), and Related Relocation Requirements

CDBG-DR funding is subject to the URA, section 104(d), and to the CDBG program regulatory requirements at 24 CFR 570.606. Some of those Federal requirements are subject to waivers and/or alternative requirements for disaster recovery purposes and are described further in Section 7 of this Program Manual.

5.1.3 Davis Bacon Requirements

Under Section 110(a) of the Housing and Community Development Act of 1974 (HCDA), laborers and mechanics employed by contractors and subcontractors on construction work "financed in whole or in part" with CDBG assistance must be paid not less than wages determined to be prevailing on similar construction work in the locality by the Secretary of Labor in accordance with the Davis Bacon Act (40 U.S.C. 3141 et seq.). Davis- Bacon prevailing wage requirements do not apply in the following situations:

- Construction work prime contracts of \$2,000 or less,

- Bona fide volunteers where procedures and requirements of 24 CFR § 70 are met
- Force account work
- Non-construction activities like storm debris removal
- Demolition that is not followed by construction
- Equipment installation costs so long as they do not exceed 13% of the total equipment cost
- Rehabilitation, reconstruction, and demolition of residential property containing fewer than eight units.

5.1.4 Section 3 of the Housing and Urban Development Act of 1968

Subrecipients shall direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons within their community. These opportunities are, to the greatest extent feasible, required to be given to low- and very low-income persons and business concerns, particularly those who are recipients of government assistance for housing or residents of the community in which the federal funds are spent. Where feasible, subrecipients should give priority for contracting opportunities and training to Section 3 workers residing within the service area or the neighborhood of the project, and participants in YouthBuild programs.

5.2 Other Federal Requirements

In addition to cross-cutting requirements, additional federal requirements apply as follows:

5.2.1 Procurement Requirements

Subrecipients must adopt a procurement policy (or amend the current policy) and comply with the federal procurement requirements of 2 CFR 200.318-327. The County will work with the subrecipient to review the procurement prior to being advertised, amended, awarded, and the resulting agreement to ensure compliance with the requirements specified herein.

Key procurement requirements:

- Any cost charged to the grant must meet three standards of necessary, reasonable, and allowable.
- All procurements must demonstrate compliance with “free and open” competition requirements.
- All procurements must have an independent cost estimate (ICE) in advance of award, and preferably in advance of procurement. Selecting the lowest bidder in the absence of an independent cost estimate does not meet HUD or 2 CFR Part 200 procurement requirements.
- Any contracts or procurement actions that exceed the micro-purchase threshold (as defined by 2 CFR 200.67) are required to be posted on the County’s website.
- Requirements for procurement of professional services at 2 CFR 20.59 apply.
- Contract preferences are for firm fixed price contracts, except for professional services contracts that can be time and materials (T&M) contracts. Timesheet documentation is required for all time and materials T&M contracts.
- Goods and services contracts must include:
 - The period of performance or date of completion and the contract amount.
 - Performance requirements and liquidated damages into each procured contract.
- Contracts that will trigger labor standards reporting (Davis Bacon) should specify this in the procurement and include a wage determination. Contract documents should specify reporting requirements. SAM documentation for general contractors and sub-contractors should be in file.
- Contracts triggering Section 3 reporting of labor hours in three categories (total labor hours, Section 3 labor hours, Targeted Section 3 labor hours) should include these requirements in both procurement and contract documents.

5.2.2 Contractor Standards

Subrecipients must ensure that any contractor that is performing work on the project complies with the Contract Work Hours and Safety Standards Act (CWHSSA) and the Copeland Anti-Kickback Act (the Copeland Act). CWHSSA requires that for any federally assisted construction contract over \$100,000 subject to Davis-Bacon and Related Acts wage standards where the Federal Government is not a direct party, contractors and subcontractors must pay laborers and mechanics, including watchmen and guards, employed in the performance of covered contracts one-and-a-half times their normal hourly rate for any hours worked in excess of 40 hours weekly, based on a work week of 7 consecutive days.

The Copeland Act applies to contractors and subcontractors that perform work on contracts for the construction, prosecution, repair, or completion of public buildings, public works, or works that are financed in whole or in part by loans or grants from the Federal Government. The Act prohibits any person from inducing a worker on a federally funded project to give up any part of the compensation to which the worker is entitled. No payroll deductions are permitted that are not specifically listed in the Copeland Act unless the contractor has obtained written permission from the employee as specified in 29 CFR 3.5 for otherwise permissible payroll deductions.

5.2.3 Construction Regulations

Non-residential structures, including infrastructure, assisted with CDBG-DR funds must be elevated or floodproofed in accordance with FEMA floodproofing standards at 44 CFR 60.31(3)(ii), or a successor standard, up to at least 2 feet above the 100-year (or 1% annual chance) floodplain.

All critical actions funded through CDBG-DR, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2% annual chance) floodplain must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)–(3) or a successor standard) to the higher of the 500-year floodplain elevation or 3 feet above the 100-year floodplain elevation. If the 500-year floodplain elevation is unavailable and the critical action is in the 100-year floodplain, then the structure must be elevated or floodproofed to at least 3 feet above the 100-year floodplain elevation. Activities subject to elevation requirements must comply with applicable federal accessibility mandates.

Critical actions are defined as “any activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.” For example, critical actions include hospitals, nursing homes, emergency shelters, police stations, fire stations, and principal utility lines.

For this program, applicants must certify that they will not use CDBG-DR funds for any activity in an area identified as flood-prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA’s most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR 55.

5.2.4 Flood Insurance Requirements

The Subrecipient shall comply with the requirements of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4001). The Subrecipient shall assure that for activities located in an area identified by FEMA as having special flood hazards, that flood insurance under the National Flood Insurance Program is obtained and maintained as a condition of financial assistance for acquisition or construction purposes (including rehabilitation)

5.2.5 Conflict of Interest

Except for the use of CDBG-DR funds to pay salaries and other related administrative or personnel costs, the general rule is that no persons who exercise or have exercised any functions or responsibilities with respect to CDBG-DR activities assisted under this subpart or who are in a position to participate in a decision making process or to gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-DR-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-DR -assisted activity, or with respect to the proceeds of the CDBG-DR-assisted activity, either for themselves or those with who they have family or business ties, during their tenure or for one year thereafter.

5.2.6 Fair Housing and Equal Opportunity

Through the use of CDBG-DR funding, no person should be excluded, denied benefits, or subjected to discrimination on the basis of their race, color, national origin, sex, disability, or age. The County and its subrecipients may not discriminate in any of the following areas: deciding who will be admitted or have access to any CDBG-DR-funded program or activity; providing opportunities in or treating any person with regard to such a program or activity; or making employment decisions in the administration of or in connection with such a program or activity. The County and the subrecipients must administer and fund programs that are in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and will affirmatively further fair housing.

Complaints alleging violation of fair housing laws can be made to HUD’s office of Fair Housing and Equal Opportunity for Region 4 (phone: 800-440-8091 or email: complaintsoffice04@hud.gov)

5.2.7 Equal Employment Opportunity Act of 1972

An Equal Employment Opportunity clause as described under 41 CFR 60-1.4(b) must be included in all contracts that meet the definition of a “federally assisted construction contract”.

Compliance with Executive Order 11246 of September 24, 1965, entitled "Equal Employment Opportunity," as amended by Executive Order 11375 of October 13, 1967, and as supplemented in Department of Labor regulations (41 CFR Chapter 60). (All construction contracts awarded in excess of \$10,000 by subrecipients and/or beneficiary of funds and their contractors.)

5.2.8 Prevention of Fraud, Waste and Abuse

The County will follow the policies outlined in the Prevention of Fraud, Waste, and Abuse policy. The policy can be found on the [Resilient SRQ](#) website.

5.2.9 Americans with Disabilities Act (ADA)

This Act provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, state and local government services, and telecommunications. The ADA also states that discrimination includes the failure to design and construct facilities (built for first occupancy after January 26, 1993) that are accessible to, and usable by, persons with disabilities. The ADA also requires the removal of architectural and communication barriers that are structural in nature in existing facilities. Removal must be readily achievable, easily accomplishable, and able to be carried out without much difficulty or expense.

6. Financial Management

6.1 Overview

Subrecipients must maintain a financial management system that meets the requirements found in 2 CFR Part 200 and the applicable subrecipient agreement. In general, these requirements specify that a subrecipient:

1. Provides effective internal control over the accountability for all funds, property, and other assets; adequately safeguards these assets and confirms the assets are used for authorized purposes.
2. Identifies the source and application of funds for CDBG-DR-funded activities.
3. Establishes procedures to verify cost reasonableness, cost allowability, allocable costs, applicable credits, and the composition of costs as either direct or indirect, as noted in 2 CFR Part 200, Subpart E- Cost Principles.
4. Ensures that the CDBG-DR funds used do not violate any applicable restrictions or prohibitions.
5. Permits the accurate, complete, and timely disclosure of financial results.
6. Minimizes the time elapsed between transfer of funds from the County and payment by the subrecipient.
7. Establishes written procedures for determining the allowability of costs in accordance with Subpart E - Cost Principles and the terms and conditions of the subrecipient agreement.

6.2 Procedure

Sarasota County will provide a CDBG-DR System of Record that will serve as the repository for project documentation, including monitoring and compliance. The System of Record will enable Sarasota County to review document files and conduct Duplication of Benefits, Verification of Benefits and related verifications required to comply with CDBG-DR regulations. Subrecipient are required to assemble and review all compliance documentation and upload it to the System of Record in an orderly manner. Sarasota County will provide training to subrecipients on how to manage their CDBG-DR programs and projects with the system of record.

7. Consolidated Notice Waivers and Alternative Requirements

This section will outline the waivers and amendments provided in the Federal Register as it pertains to Infrastructure (Public Facilities, Public Improvements) Match and Elevation of Non-Residential Structures.

7.1 Alternative Requirements

All newly constructed Infrastructure assisted with CDBG-DR funds must be designed and constructed to withstand extreme weather events and the impacts of climate change. To satisfy this requirement, Sarasota County and its subrecipients will identify and implement resilience performance metrics as described in section II.A 2 of the Consolidated Notice and are as follows:

- ✓ **Alignment with mitigation plans:** Sarasota County will ensure that the mitigation measures identified in our action plan will align with existing hazard mitigation plans submitted to FEMA or other state, local, or tribal hazard mitigation plans.
- ✓ **Mitigation Measures:** Sarasota County and its subrecipients must demonstrate that they have incorporated mitigation measures into CDBG-DR activities as a construction standard to create communities that are more resilient to the impacts of recurring natural disasters and the impacts of climate change. Sarasota County and its Subrecipients will design and construct structures to withstand existing and future climate impacts expected to occur over the service life of the project.

- ✓ **Resilience performance metrics:** Sarasota County and its subrecipients will establish resilience performance metrics for the activity including:
 - an estimate of the projected risk to the completed activity from natural hazards, including those hazards that are influenced by climate change (e.g., high winds destroying newly built homes),
 - identification of the mitigation measures that will address the projected risks (e.g., using building materials that are able to withstand high winds), and
 - an assessment of the benefit of the project measures through verifiable data (e.g., 10 newly built homes will withstand high winds up to 100 mph).

Elevation of Non-Residential Structure

Nonresidential structures, including infrastructure, assisted with CDBG–DR funds must be elevated to the standards described in this paragraph or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or one percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)– (3) or successor standard) to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation.

If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Activities subject to elevation requirements must comply with applicable federal accessibility mandates. In addition to the other requirements in this section, Sarasota County and its subrecipients will comply with applicable state, local, and tribal codes and standards for floodplain management, including elevation, setbacks, and cumulative substantial damage requirements.

Sarasota County and its subrecipients using CDBG–DR funds as the non-federal match in a FEMA-funded project may apply the alternative requirement for the elevation of structures described in section IV.D.5.

CDBG-DR Funds as Match

As provided by the HCDA, grant funds may be used to satisfy a match requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG–DR activity. This includes programs or activities administered by the FEMA or the U.S. Army Corps of Engineers (USACE). By law, (codified in the HCDA as a note to section 105(a)) only \$250,000 or less of CDBG–DR funds may be used for the non-Federal cost share of any project funded by USACE. Appropriations acts prohibit the use of CDBG–DR funds for any activity reimbursable by, or for which funds are also made available by FEMA or USACE.

In response to a disaster, FEMA may implement, and Sarasota County and its Subrecipients may elect to follow, alternative procedures for FEMA’s Public Assistance Program, as authorized pursuant to section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (“Stafford Act”). Like other projects, Sarasota County and its Subrecipients may use CDBG–DR funds as a matching requirement, share, or contribution for section 428 Public Assistance Projects. For all match activities, Sarasota County and its Subrecipients will document that CDBG–DR funds have been used for the actual costs incurred for the assisted project and for costs that are eligible, meet a national objective, and meet other applicable CDBG requirements.

Requirements for Flood Control Structures

Sarasota County and its Subrecipients are aware that the use of CDBG–DR funds to assist flood control structures (i.e., dams and levees) are prohibited from using CDBG– DR funds to enlarge a dam or levee beyond the original footprint of the structure that existed before the disaster event, without obtaining pre-approval from HUD and any Federal agencies that HUD determines are necessary based on their involvement or potential involvement with the levee or dam.

Sarasota County and its Subrecipients are aware that the use of CDBG–DR funds for levees and dams are required to: (1) register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams; (2) ensure that the structure is admitted in the USACE PL 84–99 Program (Levee Rehabilitation and Inspection Program); (3) ensure the structure is accredited under the FEMA National Flood Insurance Program; (4) enter the exact location of the structure and the area served and protected by the structure into the DRGR system; and (5) maintain file documentation demonstrating that the grantee has conducted a risk assessment before funding the flood control structure and documentation that the investment includes risk reduction measures.

8. Closeout

8.1 Closeout Procedure and Documents

When executing closeout procedures, the subrecipient will be required to provide closeout documents to the County. The subrecipient can request final funds when the project meets the following conditions:

- All eligible activities are completed and meet a national objective.
- All funds are expended in full, or the remaining funds are intended to be returned to HUD.
- All reporting requirements as required (e.g., Quarterly Performance Reports, HUD Monthly Status Reports, HUD Contract Reports, other internal reporting) are completed and submitted.
- Any special conditions of the program are met.
- All audit and monitoring issues are resolved.

The County will work with subrecipients to collect all closeout documentation for their files to support HUD requirements for close-out. A final closeout file review will be required to ensure that all documentation required in each step of the process is completed and is compliant. Subrecipients are required to submit documentation, including but not limited to the following:

- Documentation reporting the grant accomplishments and expenditures of each project to the residents of the jurisdiction, including that the HUD national objective was met
- Documentation that funds were expended in full or certification of the return of the remaining funds
- Documentation describing the resolution of any outstanding audit or monitoring issues
- Duplication of benefits verification form
- Certification of completion from an engineer
- Flood insurance documentation, where applicable
- Final inspection and documentation

A final DOB review will be completed by the subrecipient and verified by Sarasota County as part of the closeout process.

9. Appendix

9.1 Abbreviations and Definitions

Acquisition – The acquiring of real property, in whole or in part, by the recipient, or other public or private non-profit entity through purchase, long-term lease, donation, or otherwise for any public purpose, subject to the limitation of 24 CFR 570.207. Real property includes air rights, water rights, rights-of-way, easements, and other interests therein (24 CFR 570.201).

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

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

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

CFR: Code of Federal Regulations

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

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

Consolidated Notice – The U.S. Department of Housing and Urban Development’s Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 88, No. 96. The Consolidated Notice governs all Office of Long-Term Resiliency Community Development Block Grant-Disaster Recovery grants beginning with 2020 disasters and includes amended requirements from previous Federal Register Notices and Community Planning and Development Notices that have

regulated Community Development Block Grant-Disaster Recovery funds in the past. The Consolidated Notice includes waivers and alternative requirements, relevant regulatory requirements, the grant award process, criteria for action plan approval, and eligible disaster recovery activities.

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

Davis-Bacon and Related Acts (DBRA) – Federal law requiring contractors and subcontractors performing on federally funded or assisted contracts for the construction, alteration, or repair of public buildings or public works to pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area.

Direct Cost – Any project cost or project delivery cost that is identified specifically with completing an activity or product such as materials and labor. Costs identified specifically within a contract are direct costs of that contract. Administrative expenses are not generally considered direct costs.

Disability – Federal nondiscrimination laws define a person with a disability to include any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with a record of such impairment; or (3) individual who is regarded as having such an impairment consistent with federal law under The Social Security Act, as amended, 42 U.S.C. §423(d), The Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §12102(1) -(3), and in accordance with the U.S. Department of Housing and Urban Development regulations at 24 CFR 5.403 and 891.505.

Disaster Recovery Grant Reporting (DRGR) System – The U.S Department of Housing and Urban Development’s web-based reporting and grants management system.

DRGR: Disaster Recovery and Grant Reporting System developed by HUD. It is primarily used by grantees to access grant funds and report performance accomplishments for grant-funded activities.

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

Elderly—A person at least 62 years of age [24 CFR § 5.100].

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

FEMA: Federal Emergency Management Agency

FFATA: Federal Funding Accountability and Transparency Act

Force Account Work - The use of a subrecipients own labor force to carry out a capital project. Force account work may consist of design, construction, refurbishment, inspection, and construction management activities, if eligible for reimbursement under the grant. Incremental labor costs from flagging protection, service diversions, or other activities directly related to the capital grant may also be defined as force account work. Documentation can include a force account plan for the work accomplished or planned, or any other documentation that reflects that in-house labor forces were "budgeted" to accomplish the work.

Grantee – As used in this document, the grantee is Sarasota County, Florida as recipient of Community Development Block Grant-Disaster Recovery funds from the U.S. Department of Housing and Urban Development.

HCDA: Housing and Community Development Act of 1974, as amended

HUD: The United States Department of Housing and Urban Development

Indirect Cost – Any expense not directly identified with a cost objective, such as a specific project, facility, or function. Indirect costs include administration, personnel, and security costs.

Low Moderate Area Benefit (LMA) – An eligible activity that benefits all residents in a particular area, where at least 51 percent of the residents are Low-to-Moderate Income Persons as determined by the most recently available decennial Census information, together with the Section 8 income limits that would have applied at the time the income information was collected by the Census Bureau, or a current survey of the residents of the service area.

Low Moderate Clientele – An eligible activity that benefits at least 48.33% of LMI persons. LMI presumption covers abused children, battered spouses, elderly persons, severely disabled adults (see the box below), homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers.

LMI- Low to moderate income persons

Project Delivery Cost – Costs used specifically to meet the requirements to complete a particular project, especially as it applies to meeting Community Development Block Grant requirements.

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

Quarterly Performance Report (QPR) – The Community Development Block Grant-Disaster Recovery Quarterly Performance Report that is required to be uploaded quarterly in the Disaster Recovery Grant Reporting system for the U.S. Department of Housing and Urban Development's review of Sarasota County's disaster recovery programs.

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

Subsidized Loans – Loans, including forgivable loans, other than private loans. Both Small Business Administration and Federal Emergency Management Agency provide subsidized loans for disaster recovery.

Section 3 – Section 3 of the Housing and Urban Development Act of 1968, as amended, and the implementing regulations at 24 CFR Part 135 and 24 CFR Part 75, as applicable, relating to employment and other economic opportunities for low and very low-income persons.

Service Area – The total geographic area to be directly or indirectly served by a subgrant project that addresses the Low-to-Moderate Income National Objective, in which at least 48.33 percent of the residents are low-to-moderate income persons. A service area must include all, and only those, beneficiaries who are reasonably served or would be reasonably served by the activity.

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

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

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

Subrecipient –Sarasota County Public Entity or Non-Profit, that is provided Community Development Block Grant-Disaster Recovery funds from Sarasota County to perform agreed upon eligible disaster recovery activities documented in a Subrecipient Agreement.

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

Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended – A federal law that establishes minimum standards for federally funded programs and projects that require the

acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The URA's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects pursuant to 49 CFR Part 24 and applicable waivers provided in the U.S. Department of Housing and Urban Development's Community Development Block Grant-Disaster Recovery Consolidated Notice, Appendix B of Federal Register Vol. 87, No. 23.

Urgent Need (UN) – A need that poses a serious and immediate threat to the health or welfare of the community.

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