People First Hurricane Recovery Programs

Disaster Relief Reimbursement Program (DRP)

Program Guidelines

October 27, 2026

Version 3.0

Version Control

Version Number	Date	Summary of Changes	Approved By
1.0	December 1, 2025	Original version	Pinellas County
1.1	February 5, 2026	Added clarifying language 2.1 Purpose and Objective of DRP Clarified proof of identity requirements for minor household members Updated document requirements eligibility and award determination Specified programmatic tie-back in Section 4.1 **Disaster Related Impact** Updated Expenses incurred to meet current standards Clarified how a DOB interacts with a DRP award in Section 6.1 Zero Award Determination Updated 7.2 Award Determination Added 12.1 Suspected Irregularities Appeal section	Pinellas County
Version 2.0	February 23, 2026	Clarified that DRP will not reimburse for personal property such as RVs or Boats. Clarified that the national objective for DRP is Limited Clientele (LMC) Updated Citizenship/Immigration Status documentation requirements Updated 7.2 Award Determination for rent reimbursement to follow HUD's HIGH-HOME rent limits. Added justification, rent limits, and bedroom calculation and occupancy standards. Added definition of Co-Applicant to Appendix A – Definitions	Pinellas County

		Made minor grammatical and technical updates throughout the document Updated Section 12.1 Suspected Irregularities section to clarify internal processes	
Version 2.1	April 13, 2026	Updated Section 7.2 **Award Determination**- Added Utility Allowance Scheduled calculations and justification Added language clarifying that Mobile Home Lot Rent may be considered an eligible expense for the Applicants who own their home at the time of application. Added definition of "Utilities" to Appendix A – Definitions	Pinellas County
Version 3.0	October 27, 2026	Updated Utility Calculations (7.2.1). Expanded eligibility for RMB applicants (4). Clarified language for citizenship documentation requirements (3.1.2) and Program Income (14). Added Timely Expenditures and Performance Monitoring (17), Subrogation (6.2), Conduct and Program Participation Expectations (8.4), and Fraud Awareness, Prevention, and Beneficiary Assistance (10.1) sections	Pinellas County

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Version Policy

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

Policy Change Control

Policy clarifications, additions, or deletions may be needed during the course of the Program to more precisely define the rules by which the Program will operate. Policy decisions will be documented and will result in the revision of the document in question. Unless otherwise noted, policy revisions are applied prospectively, made effective on the date of document approval. If a policy change results in an Applicant, previously deemed ineligible, becoming eligible, the Program will review impacted cases and, where appropriate, notify those Applicants to resume processing, subject to funding and Program timelines. This does not apply to administrative or procedural updates.

1 Introduction

This document serves as the Program Guidelines for disaster relief reimbursement under Pinellas County's People First Hurricane Recovery Program, known as the Disaster Relief Reimbursement Program (DRP, the Program). These guidelines were developed to serve as a basis for the DRP and to provide guidance on Program implementation that follows the U.S. Department of Housing and Urban Development (HUD) standards and best practices. This document may also serve as a reference for Property Owners, Applicants, and other interested parties who want to understand how the Program operates. Note that this Program Guideline is only intended to address the DRP. Each of the other housing recovery programs under the Pinellas County People First Housing Recovery Initiative and outlined in the Pinellas County Action Plan for Community Development Block Grant - Disaster Recovery (CDBG-DR) Funds ("Action Plan") is governed by its own Program Guidelines document.

In 2025, Pinellas County was awarded a Community Development Block Grant – Disaster Recovery grant through the U.S. Department of Housing and Urban Development (HUD) to address remaining unmet disaster recovery needs in areas impacted by Hurricanes Idalia, Helene, and Milton in 2023 and 2024. Federal Register 90, no.10 (January 16, 2025) (90 FR 4759), also known as the Allocation Announcement Notice (AAN), allocated a total of $813,783,000 to support the long-term recovery efforts of Pinellas County. The CDBG-DR funds allotted to Pinellas County have been allocated to housing, infrastructure, planning, economic revitalization, and public services. These funds will be administered through Pinellas County's Pinellas Recovers Office. Pinellas County has allocated $32,147,392 in CDBG-DR funding for the DRP which will serve as a public service activity.

The unmet needs assessment included in the Action Plan demonstrated significant unmet need related to job loss, rising costs, and housing instability throughout the County impacted by Hurricanes Idalia, Helene, and Milton in 2023 and 2024.

2 Program Overview

The DRP provides reimbursement to eligible low- to moderate-income (LMI) residents of Pinellas County, for documented subsistence-based expenses incurred as a result of a qualifying disaster, including expenses such as rent, mortgage, and utility payments resulting from the qualifying disaster for a period of up to six consecutive months.

DRP is centrally administered by Pinellas County's Pinellas Recovers Office and serves LMI households impacted by Hurricanes Idalia, Helene, and Milton. DRP is a CDBG-DR eligible activity that will be undertaken in accordance with the Universal Notice and other applicable requirements.

Due to funding limitations and other factors, DRP cannot guarantee assistance to all interested property owners. However, the Program endeavors to serve as many Pinellas County residents as it can with available funds.

DRP funds will be distributed directly to DRP Applicants by Pinellas County. Eligible essential expenses able to be reimbursed, include:

- Rent Payments
- Mortgage Payments
- Utilities

While DRP is not a housing program under the Universal Notice, it complements HUD's Rapid Unsheltered Survivor Housing (RUSH) by providing immediate financial stabilization to disaster-impacted households. This coordination supports the transition from emergency shelter under RUSH to longer-term recovery through the County's housing programs.

As DRP is designed to reimburse Applicants for eligible expenses incurred after a qualifying disaster. As a reimbursement program, no displacement due to DRP activities will occur.

DRP also does not fund the construction, reconstruction, or rehabilitation of residential or non-residential buildings and therefore does not entail the integration of mitigation measures.

2.1 Purpose and Objective of DRP

The purpose of the DRP, as a public service activity, is to assist the most vulnerable and impacted households in Pinellas County and address the public service needs identified in the unmet needs assessment of the County's approved CDBG-DR Action Plan. DRP's primary objective is to provide reimbursement funds to eligible Applicants.

This Program is designed to ensure that the recovery needs of low- and moderate-income households, protected classes, and vulnerable populations are addressed to the greatest extent feasible. As described in the Universal Notice, LMI households often face the most severe and prolonged impacts after a major disaster, including loss of income, displacement, and increased housing and utility burdens. By serving this population, the Program aligns with HUD's eligible activity and national objective requirements and ensures that resources are directed to those with the greatest recovery challenges and the least capacity to independently address them.

2.2 National Objective

Activities funded through the DRP will meet HUD's Limited Clientele (LMC) national objective by providing benefit to low- and moderate-income (LMI) persons who resided in Pinellas County at the time of the qualifying event(s) and who continue to reside in Pinellas County at the time of application. To ensure the Program complies with HUD's National Objective to benefit LMI persons under the LMC category, DRP Applicants must have a total household annual gross income that does not exceed 80% of the Area Median Income (AMI), adjusted for family size, as published annually by HUD.

2.3 Eligible Location

To be eligible, an Applicant must have resided in Pinellas County (not including the City of St. Petersburg) at the time of the storm and show that the requested reimbursement occurred in Pinellas County, Florida (including City of St. Petersburg)

2.4 . Award Caps

The maximum reimbursement award granted for disaster relief is $15,000 per household. The amount of CDBG-DR funds allocated to DRP is $32,147,392 ($8,036,848 for Homeowners and $24,110,544 for Renters).

2.5 Social Media

The Pinellas Recovers Office will also use official social media channels to provide timely, accessible updates regarding key program milestones, including the opening of the DRP application and the scheduling of public hearings related to the Program.

Social media will serve as a real-time communication tool to:

- Notify residents when the application for the Program is open;
- Announce dates, times, and locations (physical or virtual) of public hearings on proposed plans, amendments, or CDBG-DR-funded projects;
- Share links to the online application, Action Plan documents, comment forms, and registration details;
- Remind residents of upcoming deadlines for application submission or public comment periods;
- Provide summaries or video recordings of past public meetings and hearings.
- Primary platforms to be used may include, but not limited to:
  - **Facebook**: Public announcements, event invitations, and shareable graphics
  - **Instagram**: Visual promotion of program milestones, community engagement events, and success stories
  - **YouTube or Vimeo** (if applicable): Hosting recordings of public hearings and outreach videos

3 Intake Application

Individuals who are interested in disaster relief reimbursement assistance may apply for the DRP via the following methods.

- Complete a People First Hurricane Recovery Program application online at https://recover.pinellas.gov/.
- Visit any People First Hurricane Recovery Program Intake Center at the addresses/times below[1].

Office Location	Operating Hours
2600 McCormick Drive - Suite 100 **Clearwater, FL 33759**	Monday through Friday, 8 a.m. to 5 p.m.

[1] Please note that County-recognized holidays may impact these hours.

5000 Park Street - Suite 4 **St. Petersburg, FL 33709**	Monday through Friday, 8 a.m. to 5 p.m.

Table 1: Intake Center Operating Hours

- Call (727)-606-3307 to be connected to a Case Manager

Applicants will be required to complete a DRP intake application and provide supporting documents required for eligibility review, income verification, 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 DRP to obtain 3rd-party data by signing a consent/release form. Case Managers will collect documents needed to determine eligibility and which program benefits the Applicant may be eligible to receive[2].

Case Managers will be available at the People First Hurricane Recovery Program intake centers, by phone, and via email to assist the Applicant through the intake process and to answer questions as needed. Each Applicant will be assigned a dedicated Case Manager. Each Case Manager has a direct email and phone line at which he/she can be reached. Applicants are provided direct contact information for the Case Manager assigned to the application. 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 Applicants receive timely, accurate information regarding their applications and the Program. Applicants may check the status of their application via the application portal at https://recover.pinellas.gov/. Methods of communication with the Program include, but are not limited to:

- Pinellas County website: https://recover.pinellas.gov/
- Email: recover@pinellas.gov
- Telephone at (727)-606-3307; and
- Mail correspondence: 400 S. Ft. Harrison Ave., Suite 349, Clearwater, FL 33756.

Pinellas County will establish a deadline after an evaluation period as the applications are accepted by DRP. Pinellas County may adjust the intake period at its discretion to accommodate Program needs and will post deadlines online.

Pinellas County will ensure that all Applicants have meaningful access to the intake and application process consistent with Title VI of the Civil Rights Act of 1964. Applicants who require assistance due to language, disability, or other access barriers may request reasonable accommodations, and the Program will work with them to ensure their ability to participate fully in the application process.

[2] A complete list of required documentation can be found in the Eligibility Requirements section of this manual.

3.1 Applicant Identification and Citizenship/Immigration Status

3.1.1 Identification

Applicants and adult household members aged 18 or older will be required to submit a valid, unexpired photo identification. Forms of identification accepted by DRP include:

- Government Issued photo Identification (Federal or State issued);
- Non-temporary driver's license;
- U.S. Passport;
- Military ID Card; or
- Certificate of Naturalization; or
- Permanent Resident Card (Green Card).

Household members under the age of eighteen (18) must also submit proof of age and identity. If an Applicant is unable to provide one of the above listed forms of identification for household members seventeen (17) and younger, birth certificates must be submitted. If an Applicant is unable to produce a birth certificate or one of the above listed forms of identification for a minor child, other documents may be considered on a case-by-case basis.

3.1.2 Citizenship/Immigration Status

All Applicants and Co-Applicants must meet the eligibility and verification requirements under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as amended (8 U.S.C. §§ 1601–1646), and as required by the Universal Notice. Assistance is limited to U.S. citizens and qualified aliens as defined in 8 U.S.C. § 1641.

The Program will collect the following information from Applicants and Co-Applicants to verify citizenship or qualified alien status.

3.1.2.1 Citizenship

Applicants and/or Co-Applicants who report they are U.S. Citizens will be required to provide:

- One of the following:
- U.S. Passport or Passport Card, **or**
- Certificate of Naturalization, **or**
- Certificate of Citizenship, **or**
- US Birth Certificate, **or**
- Consular Report of Birth Abroad, **or**
- U.S. military records showing U.S. birthplace; **and**
- One (1) of the following:
- REAL ID,
- Military identification,
- Foreign passport with photo,
- Other government-issued photo identification.

3.12.2. Legal Immigrants:

Applicants and/or Co-Applicants who report that they are not U.S. Citizens will be required to provide:

- Immigration documents, such as a Permanent Resident Card, may be verified through the Systematic Alien Verification for Entitlements (SAVE) system or another DHS-approved verification method.

Examples of eligible Immigration documents:

- Permanent Resident Card (I-551)
- Employment Authorization Document (I-766)
- Arrival/Departure Record (I-94)
- Refugee Travel Document
- I-797 Notice of Action

3.1.3 Applicant Designees

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

- **Power of Attorney**: A Power of Attorney is someone who is legally authorized to act on behalf of the Applicant. The powers afforded to a legally authorized Power of Attorney vary, based on the duly executed Power of Attorney document. DRP will not aid Applicants in designating or securing a Power of Attorney but will recognize the powers of a legal Power of Attorney as outlined in a Power of Attorney document submitted by the Applicant.
- **Co-Applicant:** Homeowner Applicants may designate any adult household member who is also a co-owner of the storm-impacted property as a Co-Applicant. However, it is not required that co-owners of the storm-impacted property be listed as Co-Applicants.
- Renter Applicants may designate any adult household member as a Co-Applicant. Any member of the household whose name is listed on utility statements or rental leases, statements, or ledgers that indicate responsibility for payment must be added as a Co-Applicant in order to receive reimbursement for those expenses.
- Co-Applicants will have the same authority over the DRP application as the Applicant. If a Co-Applicant is designated by the Applicant, Co-Applicants must sign all Program documents with the Applicant. The Co-Applicant will be granted decision-making authority over the DRP application. Applicants are not required to designate a Co-Applicant, regardless of whether the storm-impacted property is jointly owned.
- **Communication Designee**: A Communication Designee may be any adult person the Applicant wishes to designate as an authorized person to receive information about the Applicant's DRP application. DRP shall be authorized to share information with the Communication Designee, but the Communication Designee is not authorized to make any decisions regarding the DRP application or affect the DRP application on the Applicant's behalf.

3.2 Required Applicant Certifications

As part of the DRP application process, each Applicant must sign an Acknowledgements and Consent statement. The Acknowledgements and Consent statement includes the following acknowledgements and authorizations. The table below outlines the required certifications, along with a description of the content of the certification.

Certification	General Description
Release of Information	Authorization from the Applicant to share and receive personal information from third parties in connection with DRP and for purposes of progressing his/her case through DRP.
Certification of Truthfulness	Applicant affirmation that all information provided in the application is accurate.
Subrogation Agreement	Applicant affirmation that any funds received for the same purpose as funds provided under DRP after provision of assistance through DRP must be returned to Pinellas County.
Conflict of Interest Disclosure	Applicant's report of relationship with any public servant, employee, agent, consultant, officer, or elected official or appointed official of Pinellas 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.

Table 2: Applicant Certifications Collected at Intake

3.3 Order of Assistance (Prioritization)

Owner-Applicant households will be prioritized based on award date under the Homeowner Rehabilitation/Reconstruction Program (HRRP). All other Applicants will be processed on a first-come, first-processed basis.

3.4 Funding Allocation

Pinellas County has allocated the funding for the Program in the following way:

- $8,036,848 reserved for LMI Owner Households
- $24,110,544 reserved for LMI Renter Households

4 Eligibility Requirements

The DRP will assist LMI Owner Households and LMI Renter Households impacted by Hurricanes Idalia, Helene, and/or Milton. Each Applicant will be screened for eligibility to ensure compliance with DRP requirements.

Applicants will be required to provide complete and accurate information regarding their household composition, household income, and 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 assistance.

If an Applicant is found to have submitted inaccurate and/or incomplete information in order to appear eligible for DRP, then they may be required to make full restitution to Pinellas County, including administrative fees, reimbursements, and other costs.

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. Please note that being deemed eligible does not guarantee that assistance will be provided, as DRP is subject to limited funding.

All Applicants to DRP must demonstrate compliance with all eligibility criteria. **Applicants** applying to DRP for assistance must meet **all** of the following criteria:

- Must qualify as low-to-moderate income (LMI)
- Must have maintained primary residence in Pinellas County (except for the City of St. Petersburg) at the time of the qualifying disaster(s)
- Must demonstrate primary residency in Pinellas County at the time of DRP application (including within the City of St. Petersburg)
- Must describe a financial hardship resulting in financial need resulting from the qualifying disaster(s)[3];
- Have eligible expenses incurred for the most recent six months prior to applying to Pinellas County for CDBG-DR assistance. Applicants must apply within two years of the applicability date of the grantee's initial AAN (January 21, 2025) for that disaster; and
- Owner-Applicant households, as defined in Appendix A – Definitions, must be eligible to receive an award under the Homeowner Rehabilitation/Reconstruction Program (HRRP) or the Homeowner Reimbursement Program (RMB).

Eligibility will be determined by the Program based on a combination of information and documents supplied by the Applicant and information verified independently by the Program.

The following table includes eligibility criteria for Applicants, along with documents required to be submitted by the Applicant for each criterion. Eligibility criteria that will be independently verified by the Program are noted as such.

Eligibility Criterion	Document(s) Required
Must describe a disaster related impact	Hardship Attestation Form

[3] See section 4.1.1 of these Program Guidelines

Must have had eligible expenses incurred prior to applying for People First[4]	For Rent expenses, one (1) of the following: • Most recent Rent Statement and Lease, or Rent Ledger, or Notarized letter or form from Landlord[5] For Mortgage expenses, provide as many as applicable: • Most recent Mortgage Statement • Most recent Lot Rent Statement (for MHU (Manufactured Housing Unit) owners) For Utility expenses: • Most recent Utility Statement(s) prior to application
Primary Residence in Pinellas County (except City of St. Petersburg) at Time of Storm	One (1) Document from the following list: • Homestead exemption at the damaged property address in 2023 for Hurricane Idalia or 2024 for Hurricane Helene or Milton. • Signed Lease Agreement[6] OR two (2) documents from the following list: • FEMA IA award for damaged property • SBA Disaster Home Loan • Driver's license or state-issued ID card • Utility Statements • Credit card bill or bank statement • Insurance documentation. • Other documents may be considered on a case-by-case basis
Primary Residence in Pinellas County (including City of St. Petersburg) at time of DRP Application	One (1) Document from the following list: • Homestead exemption at the property address for 2025. • Signed Lease Agreement[7] OR two (2) documents from the following list:

[4] People First does not reimburse expenses incurred for personal property, such as RVs or Boats.

[5] Month-to-month tenancy or temporary leases will generally not be accepted for Renter Applicants but may be considered on a case-by-case basis.

[6] If the landlord listed on the lease is not listed as the owner of the property according to the Pinellas County Property Appraiser's website, the Program may request additional proof of primary residence.

[7] If the Landlord listed on the lease is not listed as the Property Owner or Property Manager, the Program may request additional proof of primary residence

	• FEMA IA award for damaged property • SBA Disaster Home Loan • Driver's license or state-issued ID card • Utility Statements • Credit card bill or bank statement • Insurance documentation. • Other documents may be considered on a case-by-case basis
Owner-Applicant household must be in HRRP program	Verified by the Program using the system of record. Any Mortgage Statements or Utility Statements address must match the address listed for the HRRP or RMB Program.

Table 3: Accepted Method(s) of Verification of Eligibility Criteria for Applicants

Each eligibility criterion is further outlined in the sections that follow.

4.1 Disaster Related Impact

As described in the Universal Notice, the severity of disasters that qualify for CDBG-DR funding creates long lasting hardship for affected households, in particular those who are low-to moderate-income (LMI). Survivors frequently struggle to maintain employment, meet housing costs, and afford essential needs such as utilities while also managing ongoing recovery expenses. These unmet needs often continue for months or years after the event, underscoring the need for CDBG-DR assistance.

Therefore, considering the aforementioned hardships, the County presumes that LMI households who were Pinellas County residents at the time of a qualifying event were directly or indirectly affected, resulting in community-wide financial hardships demonstrated by job loss, business failure, unpaid time off, home damage, evacuation, etc. As such, the County is establishing a Program-level, indirect tieback by limiting DRP assistance to LMI households who resided in Pinellas County at the time of an eligible event, and who reside in Pinellas County at the time of application to the Program.

As such, Applicants to the Program have demonstrated that they have a financial need resulting from expenses and losses resulting from the qualifying disaster(s) by documenting 1) their status as an LMI household and 2) their primary residency in Pinellas County at the time of the storm. This indirect tieback will be further substantiated by Applicant self-attestations describing household impacts that are consistent with the hardships described above.

4.1.1 Hardship Attestation

To qualify for DRP, Applicants must describe their storm-related financial hardship resulting in financial need as a result of Hurricane(s) Idalia, Helene, and/or Milton. Hardship attestations are intended to support an Applicant's recovery narrative and are not used to establish a direct tieback to the qualifying event(s). As a public service activity, tieback is established at the Program level through a presumption that LMI Applicants who resided in Pinellas County at the time of the qualifying event(s) experienced the hardships described in section III.D.5.g. of the Universal Notice and as described in Section 4.1.

Applicants will be required to submit a Hardship Attestation Form that describes financial need due to reasons including, but not limited to, the following:

- Job Impact
    - Job loss
    - Failure of business
    - Time off
    - Other, on a case-by-case basis
- Primary Residence Impact
    - Home Damage
    - Evacuation
    - Other circumstances leading to risk of displacement, on a case-by-case basis

4.2 Expenses Incurred

Because Pinellas County presumes ongoing financial hardship for LMI households affected by a qualified disaster, and to ensure fair and streamlined distribution of funds, the County will reimburse expenses associated with the Applicant's primary residence[8] at the time of application that were incurred in the most recent six months prior to an Applicant's date of application. To be eligible for DRP assistance, expenses must have been incurred prior to Application to Pinellas Recovers, and no later than January 2027.

4.3 Primary Residence at Time of Storm

To be eligible, Applicant must show that they resided in Pinellas County, Florida (excluding City of St. Petersburg) at the time of the storm. The Program will verify the location though the address provided on the verification documentation such as the signed lease agreement, mortgage statement, or utility bill.

4.4 Primary Residence at Time of DRP Application

To be eligible, the Applicant must show that they are currently residing in Pinellas County, Florida (including City of St. Petersburg) at the time of application to DRP. The Program will verify the location though the address provided on the verification documentation such as the signed lease agreement, mortgage statement, or utility bill.

4.5 Income Verification

The Program will use the Internal Revenue Service (IRS) Form 1040 definition of income, as set forth in HUD regulations, for the purpose of determining Applicants' eligibility for the Disaster Relief Reimbursement Program. The IRS Form 1040 method of calculating income is often referred to as the Adjusted Gross Income or AGI method.

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[8] Due to the hardships described in Section III.D.5.g of the Universal Notice, the Program considers housing costs incurred by LMI households residing in Pinellas County from the date of the qualifying event(s) through the date of application to the DRP—specifically, rent or mortgage payments and utilities—to be disaster-related expenses and therefore reimbursable under this public service activity.

All household members included in the AGI calculation, if required to file, must provide a copy of their previous year's filed tax return and proof of IRS acceptance such as but not limited to Tax Account Transcript, if available, for the AGI of the household to be calculated.

The Program will also verify that the tax return was submitted and accepted by the IRS using the IRS "Where's My Refund" verification portal (https://www.irs.gov/wheres-my-refund). If the return amount differs by more than ± $250 from the reported amount on Form 1040, the Applicant must provide a Record of Account Transcript to confirm acceptance and accuracy.

The Program will allow the use of the previous tax year's tax return in determining annual income for each adult household member and no other documentation will be required. However, the Applicant will certify there has not been any substantial changes in income since the previous year's tax return. If there have been significant changes to household income, the Program may require additional income documentation to calculate income.

Non-Recurring or One-Time Income: If an Applicant or household member received a one-time, non-recurring lump-sum payment such as a withdrawal from a 401(k), 403(b), IRA, or pension account, or other similar source, the Program may exclude that amount from annual income provided that:

1. The withdrawal is documented as a one-time, non-recurring transaction that is not expected to occur within the next 12 months;
2. The withdrawal is not part of a regular income stream or periodic distribution; and
3. The Applicant provides documentation verifying the source, amount, and non-recurring nature of the withdrawal (e.g., account statement or letter from the financial institution).

The Applicant's anticipated annual income, excluding such one-time withdrawal(s), must still fall within the applicable income limits (≤ 80 % AMI). All exclusions of one-time income must be clearly documented and justified in the case file.

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

- **Wages**: Three (3) recent paystubs within the past three (3) months, W-2 Forms;
- Retirement or Social Security:
    - Past two (2) Monthly Bank Statements (Social Security Benefits & Pension only); **OR**
    - Current Social Security Benefits letter (including benefits paid to minors); **OR**
    - Current Pension/Retirement Benefit letter (if applicable), or prior year 1099 form; **AND/OR**
    - Current Annuity Payment letter (if applicable), or prior year 1099 form.

Bank statements acceptable only if they clearly show gross recurring deposits; if net, require cross-verification with award letter or SSA-1099 to add back deductions.

- **Self-Employment Income:**

    - Most recent tax return (1040 or 1040A), W-2 Forms; and/or Current year profit and loss statement;
    - **And** Two (2) monthly bank statements
- **Rental Income:**
    - Current lease agreements;
    - **And** Two (2) monthly bank statements
- **Unemployment Benefits:** Current benefit letter with gross benefit amount;
- **Court Ordered Alimony/Spousal Maintenance:**
    - Copy of court order documentation;
    - **And** two (2) monthly bank statements
- **Taxable Interest and Dividends**
    - (including amounts received by, or on behalf of minors);
    - **And** two (2) monthly bank statements
- **No Income:** Adult household members who do not earn an income will be required to submit a Certification of No Income.

4.5.1 Household Size

A household is defined as all persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a single family, two or more families living together, or any other group of related or unrelated persons who share living arrangements. Household members are all persons (minors and adults) who are living in the home. The test of meeting the low-to-moderate income objective is based on the total adjusted gross income of all the household members.

In the event that one of the following special circumstances applies, the referenced individuals are not considered household members. Individuals meeting the below referenced special circumstances will be excluded from the total household income calculation:

- Persons who are temporarily living with the Applicant, including tenants
- Persons who are employed by the household as a live-in aide and/or are a child of that aide. Note: A live-in aide/caregiver that is related does not qualify. In such cases, their income will be included in the total household income calculation and the live-in aide, and any child of the aide will be included in the total household composition; and
- If an Applicant is married and their spouse is absent from the household, the income of the absent spouse will not be included in the total household income if documentation of a separate residence for the absent spouse is provided.

4.5.2 Income Calculation Methodology

Household income shall be calculated based on the adjusted gross income as defined for purposes of reporting under Internal Revenue Service (IRS) Form 1040 series for individual Federal annual income tax purposes. DRP will consider income of all household members, not just the Applicant, to make a determination of annual household income.

DRP will use the following rules to determine the income of household members to be included in the household income calculation:

- **Minors** - Earned income of minors, including foster children (household member under age 18) is not counted. Unearned income attributable to a minor is included in the household income calculation (Examples include payments from trusts, stocks, bonds, etc. if the payments are taxable at the Federal level).
- **Temporarily Absent Family Members -** The income of temporarily absent family members is counted in the annual income, regardless of the amount the absent member contributes to the household. Temporarily absent family members are also counted as a member of the household when determining the household size. For purposes of this Program, a temporarily absent family member is one who is away from the home but maintains ties to the household and is expected to return. Examples include military spouses or service members on deployment, or household members temporarily incarcerated or living elsewhere for employment, medical treatment, or caregiving. The absence is considered temporary if there is an intention to return and the Applicant maintains the unit as the person's primary residence (e.g., bedroom, personal belongings, mailing address).
- **Permanently Absent Family Members** - In situations where family members are permanently absent such as when a spouse is in a nursing home, the head of household has the choice of excluding the individual in the household composition, as well as any taxable income they receive. However, if the absent family member is included in the household composition, the taxable income must also be included in the total household income calculation.

5 Conflict of Interest

A conflict of interest is a situation in which any person who is a public servant, employee, agent, consultant, officer, or elected official or appointed official of Pinellas County, or of any designated public agencies, or of subrecipients that are receiving funds under the CDBG-DR program (collectively, "Public Servant") 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" is defined to include parents (including mother-in-law and father- in-law), grandparents, siblings (including sister-in-law and brother-in-law), and children of an official covered under the CDBG Conflict of Interest regulations at 24.CFR.570.611, 2 CFR § 200.1122, and CFR 200.318(c).

No public servant shall intervene, either directly or indirectly, in any matter in which they have a conflict of interest that may result in their benefit. No public servant shall intervene, directly or indirectly, in any matter in which any member of their family unit, relative, partner or housemate has a conflict of interest that may result in benefit for any of the abovementioned.

The above conflict of interest statement does not necessarily preclude Pinellas County or Pinellas Recovers officials, their employees, agents and/or designees, or family members from receiving assistance from the Program. On a case-by-case basis, Pinellas County or DRP officials, their employees, agents and/or designees, or family members may still be eligible to apply and to

receive assistance from the Program if the Applicant meets all Program eligibility criteria as stated in these guidelines and it is determined that a conflict of interest does not exist.

Applicants must disclose their relationship with any public servant(s) at the time of their application, if applicable. Any relationship reported between an Applicant and public servant will be evaluated by DRP to determine if said relationship constitutes a conflict of interest as outlined in HUD Conflict of Interest regulations, at 24 C.F.R. §570.611 and 2 CFR 200.318(c)(1). If it is determined that the relationship between the Applicant and the public servant(s) constitutes a conflict of interest, the Applicant may not receive benefit under DRP.

6 Duplication of Benefits

Eligible Applicants may have previously received assistance from other sources for disaster related expenses. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. § 5155 (Section 312), prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which he/she has received financial assistance under any other program, from private insurance, charitable assistance, or any other source. No CDBG-DR funds in HRRP will be used for activities where funds are available or reimbursable by the Federal Emergency Management Agency (FEMA) or the United States Army Corps of Engineers (USACE). During the application process, the Applicant must report any and all assistance received from other sources for the expenses. Previous funds received and reported by the Applicant are verified by the DRP during the Duplication of Benefits (DOB) review process. Not all previous assistance received constitutes a Duplication of Benefits.

DRP will follow Pinellas County's CDBG-DR Duplication of Benefits Procedure that is in accordance with the Universal Notice Appendix C, the Program will apply HUD's Duplication of Benefits framework to all Applicants. The framework requires that the Program: (1) assess the Applicant's total need; (2) identify all assistance received or reasonably anticipated; (3) exclude non-duplicative amounts; (4) exclude funds provided for different purposes; (5) exclude funds for the same purpose but different allowable uses; (6) identify the final DOB amount (if any) and calculate the CDBG-DR award; and (7) reassess unmet need if additional assistance becomes available. Applicants must sign a Subrogation Agreement requiring repayment of duplicative assistance received after award.

Prior to the award of assistance, the Program will use the best, most recent available data from FEMA, the Small Business Administration (SBA), insurers, and other Federal, State, or local sources to verify disaster-related assistance and prevent a Duplication of Benefits. If duplication is identified, the DRP award will be adjusted or reduced in accordance with Section 312 of the Stafford Act (42 U.S.C. § 5155) and HUD's April 2025 Universal Notice, Appendix C.

6.1 Zero Award Determination

If a DOB occurs, this amount will be subtracted from the total eligible award amount. If the DOB amount exceeds the eligible award, the result is a Zero Award, and the Applicant will be ineligible to receive DRP funding. Applicants will be notified in writing if a DOB results in a Zero Award. Applicants have thirty (30) days from the date of the Zero Award notice to appeal the determination.

6.2 Subrogation

Applicants must subrogate any additional funds received for the same purpose as funds provided by DRP back to the Program. CDBG-DR funding must be funding of last resort. If additional funds are paid to Applicant awardees for the same purpose after DRP has provided reimbursement those funds constitute a Duplication of Benefit and therefore must be returned to Pinellas County. Applicant awardees will be required to sign a Subrogation Agreement as part of their Grant Agreement with the Program. Every subrogation agreement will include this statement:

Warning: *Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18 U.S.C. 2, 287, 1001 and 31 U.S.C. 3729.*

7 Award

Applicants who are deemed eligible will be notified that they are eligible to receive an award in writing, via an award letter. After the award letter is sent, the DRP Case Manager will schedule a Grant Agreement (GA) signing event with each eligible Applicant and Co-Applicant.

During the GA signing event, the Case Manager will review the information outlined in the Grant Agreement. The Applicant and Co-Applicant must sign the GA or appeal the award determination within **thirty (30) days** of the award letter being sent or the case will be closed[9].

7.1 Award Caps

The maximum award granted for Disaster Relief Reimbursement of any one household is up to $15,000. Reimbursement shall be limited to one payment to each individual household.

Eligible Applicants for a Disaster Relief Reimbursement award must have incurred eligible expenses prior to their application with People First and after the date of the qualifying storm.

7.2 Award Determination

DRP funds will be distributed to Applicants directly. Eligible expenses include:

- Rent Payment
- Mortgage Payment
- Utilities

In order to ensure the effectiveness of the Program through rapid deployment of resources and to ensure reasonable activity delivery costs relative to amounts, the following methods will be applied towards each eligible expense to determine the final Award Amount.

Eligible Expense	Award Calculation (up to 6 Consecutive Months)
Rent[10]	Rent calculations are based on current High-HOME Rent limits for a unit sized to appropriately accommodate the Applicant household. Appropriate unit size will be determined as the smallest unit that would house all household members without overcrowding[11]. The Award amount shall be determined as 6 months' rent at High-HOME Rent limit for the appropriate unit size, regardless of any arrearages. .
Mortgage Payment	Mortgage payments for up to six (6) months. Mortgage reimbursement may include up to six (6) months of properly documented Lot Rent fees for MHU owners.

[9] Exceptions may be made on a case-by-case basis for extenuating circumstances.

[10] Rent Statement and Lease, or Rent Ledger, or a notarized letter from Applicant's Landlord must show tenancy for the most recent six months prior to application date. If the Applicant relocated during the most recent six months prior to application, additional documentation may be requested to prove tenancy, if applicable.

[11] For purposes of determining appropriate unit size, a one (1) bedroom will be the smallest unit considered for rent and utilities and a five (5) bedroom will be the largest unit size considered for calculation of rent and utilities.

Utilities	Utility calculations are based on the average of current Utility Allowance Schedules for Pinellas County, St. Petersburg, and Clearwater Public Housing Authorities (PHAs) based on unit size. Unit size for both renters and homeowner, will be determined using the same methodology as in rent calculations. The Award amount shall be determined as 6 months Utility Allowance for appropriate unit size.

Table 4: Award Determination Method(s) of Eligible Expenses for Applicants

7.2.1 Award Calculation

The DRP Program uses HUD High-HOME Rent limits for Renter-Applicants as well as an average of the Pinellas County, St. Petersburg, and Clearwater PHAs Utility Allowance schedule for both Renter-Applicants and Owner-Applicants, adjusted by unit size, to establish the maximum eligible housing expense that may be reimbursed to a household. This approach provides a standardized, federally recognized proxy for reasonable housing costs while maintaining consistency, cost reasonableness, and streamlined Program delivery for Applicants.

Primary housing expenses differ significantly across Applicants due to neighborhood, timing of lease, and unit characteristics unrelated to disaster impact. The High-HOME Rent limit and Utility Allowance Schedule provides a HUD-approved Award cap that reflects both reasonable market rents and utilities without paying luxury or excessive costs.

Additionally, Awards based on the number of bedrooms appropriate for the household size, not the specific unit the Applicant elected to rent, prevent larger households from being under-assisted and smaller households from receiving a disproportionate amount of assistance for oversized units.

High HOME Rents are widely used by HUD Programs to represent the upper bound of reasonable rent for standard housing in a community. In addition, Utility Allowance Schedules as approved by HUD and local Pinellas County PHAs establish a reasonable standard of utility costs in the community. Using an established federal metric ensures transparency and repeatability in making Award determinations.

Pinellas County will not reduce the Award amounts due to overdue balances, arrearages, pledges, or returned payments as the standardization of these Award amounts is intended to provide a predictable, equitable, and needs-based benefit that reflects disaster-related unmet housing needs—not a retrospective reconciliation of the Applicant's prior payment history. Reducing eligible Award amounts due to arrearages or past-due balances would create disparate outcomes between otherwise similarly situated households, undermine the purpose of the Program, and introduce subjective variability inconsistent with HUD compliance expectations.

7.2.1.1 Current High-HOME Rent limits [12]:

1 BR	2 BR	3 BR	4 BR	5 BR
$1252	$1504	$1729	$1909	$2088

7.2.1.2 Current Utility Allowance Schedule[13]

Eligible Utilities	1 BR	2 BR	3 BR	4 BR	5 BR
Natural Gas	$52	$59	$68	$77	$86
Electric	$128	$161	$202	$244	$285
Propane	$118	$143	$176	$209	$239
Water	$29	$36	$57	$73	$91
Sewer	$58	$68	$90	$107	$124
Trash Collection	$35	$35	$35	$35	$35

7.2.1.3 Determination of Appropriate Unit Size

Award amounts for Renter-Applicants will be determined based on High-HOME Rent for appropriate unit size. The Program will determine appropriate unit size based on the Renter-Applicant's household composition. The number of bedrooms required per appropriate unit size will be determined based on the guidance below. DRP appropriate unit size calculation will never assume more than two (2) people per bedroom. For purposes of determining appropriate unit size, it is assumed that:

- Adult couples will be determined to require one (1) bedroom;
- Children of the same sex will be determined to require one (1) bedroom;
- Children of opposite sexes will be determined to require separate bedrooms;
- Adult household members who are not part of a couple in which both parties reside in the household will be determined to require one (1) bedroom each, and
- Members of different generations—such as grandparents, parents, and children—will never be determined to share a bedroom

[12] High-HOME Rents are updated and published annually by HUD. Current rates can be found at: https://www.hudexchange.info/programs/home/home-rent-limits/

[13] Utility Allowance Schedule will be updated to follow current Pinellas County PHA schedules.

8 Applicant Responsibilities

For DRP to be successful in providing Applicants with Disaster Relief Reimbursement Awards, the Applicant must participate and comply with Program timeframes, directives, and requests. DRP is a voluntary program. Applicants who do not wish to comply with all or some of the Applicant responsibilities may opt to withdraw from the Program at any time.

8.1 Applicant Cooperation with the Program

Throughout the life of an Applicant's participation in DRP – 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 **thirty (30) days**.

DRP 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 in order to proceed and that if the Applicant does not complete the required action within **thirty (30) 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. Not all requests for documentation are for documents an Applicant must produce. Some documentation requests may be related to documents generated by the Program that the Applicant must sign. Applicants must submit and/or sign requested documents in a timely manner.

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

8.2 Applicant Responsiveness

The Program 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 he/she must contact the Program or complete an action within **fourteen (14) days** of the date of the letter. If the Applicant fails to contact the Program or complete the action within the **fourteen (14) days** allowed, the application will be closed.

8.3 Recapture

Rare instances may arise where an Applicant must return all or part of the awarded funding to the Program. The Program 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 a DOB did not occur and that Applicants are in compliance with Program requirements and federal guidelines. If an Applicant has been identified as receiving a potential

overpayment, the Program will document the amount and basis for the repayment in writing via a Repayment Notification.

Applicants who disagree with a repayment amount determined by the Program may appeal the determination within **thirty (30) 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 Program 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 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 CDBG-DR grant fund, the Applicant must repay their funds in a timely manner. All repayments shall be expected to be repaid in full as one lump sum amount. The Program 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.

8.4 Conduct and Program Participation Expectations

To promote efficient, respectful, and timely delivery of disaster recovery assistance, all Applicants, household members, and authorized Communication Designees participating in the People First (CDBG-DR) Disaster Relief Reimbursement Program (DRP) are required to maintain professional and cooperative conduct when interacting with County staff, consultants, and Program representatives.

8.4.1 Participant Standards of Conduct

Program Participants including Applicants, household members, and Authorized Designees are expected to:

- Treat County staff, Program representatives, and Consultants with respect and professionalism at all times.
- Communicate in a courteous, non-abusive, and non-threatening manner in all verbal, written, and electronic correspondence.
- Cooperate in good faith with Program activities, including document requests, meetings, verifications, and other authorized actions necessary for program implementation.
- Refrain from obstructing, delaying, or otherwise interfering with authorized Program processes.

8.4.2 Prohibited Conduct

The following behaviors are strictly prohibited and may result in corrective action by the County:

- Use of threatening, profane, discriminatory, harassing, or aggressive language or behavior during any interaction with program staff, consultants, or partners.
- Making false or unfounded allegations of fraud, misconduct, or negligence.
- Physical intimidation, threats, or actions that create an unsafe or hostile environment.

- Intentional interference with Program activities, verification, or communication processes related to eligibility determination, underwriting, or closing.

8.4.3 County Response to Prohibited Conduct

If an Applicant, household member, or Authorized Designee engages in prohibited behavior, the County may take one or more of the following actions, as appropriate:

- Issue a formal written warning to the Applicant.
- Temporarily suspend Program activities, including application processing, verification, or communication, until the matter is resolved.
- Restrict all future communications to written correspondence or through a designated County representative.
- Terminate participation in the Program if the behavior causes undue delays, endangers safety, or violates the terms of these Program Guidelines or related agreements.

Termination of Program participation under these circumstances shall be considered final and not subject to appeal.

9 Voluntary Withdrawal

An Applicant may request to withdraw from the Program at any time. Applicants may indicate a desire to withdraw to any DRP representative. It is preferred, but not required, that an Applicant who wishes to withdraw submit his/her withdrawal request in writing. After an Applicant requests to withdraw, he or she will be sent a Voluntary Withdrawal Notice. The Voluntary Withdrawal Notice informs the Applicant that DRP has received his/her request to withdraw, and that the Applicant has **fourteen (14) days** from the date of the letter to rescind the withdrawal request. If the Applicant does not rescind the voluntary withdrawal request within the **fourteen (14) day** period, the Applicant's case will be closed as withdrawn.

10 Fraud, Waste and Abuse

Pinellas County, as grantee, is committed to the responsible management of CDBG-DR funds by being a good advocate of the resources while maintaining a comprehensive policy for preventing, detecting, reporting, and rectifying fraud, waste, abuse, or mismanagement.

Pursuant to Universal Notice, Pinellas County implements adequate measures to create awareness and prevent fraud, waste, abuse, or mismanagement among other irregularities in all programs administered with CDBG-DR funds as well as encourages any individual who is aware or suspects any kind of conduct or activity that may be considered an act of fraud, waste, abuse, or mismanagement, regarding the CDBG-DR Program, to report such acts to the CDBG-DR Internal Audit Office, directly to the Office of Inspector General (OIG) at HUD, or any local or federal law enforcement agency.

In addition to these Program-specific requirements, Applicants and participants are subject to Federal statutes regarding false claims and statements.

10.1 Fraud Awareness, Prevention, and Beneficiary Assistance

Pinellas County will provide DRP applicants and beneficiaries with information designed to raise awareness of potential fraud risks associated with disaster recovery activities, including contractor fraud, identity theft, and misrepresentation of program benefits. Fraud awareness information will be provided through program materials, intake counseling, written notices, and the program website.

The Program will inform beneficiaries of common indicators of contractor fraud and poor-quality work and will advise beneficiaries not to engage private contractors for work covered under DRP or to provide payment to any individual claiming to represent the Program.

If a beneficiary experiences contractor fraud, poor-quality work, or related issues, the Program will assist the beneficiary by coordinating warranty enforcement, initiating corrective action with the assigned contractor, and facilitating appropriate referrals to local, state, or federal enforcement agencies, as applicable.

DRP includes a mandatory post-construction warranty period. Beneficiaries will receive formal written notification of warranty coverage at project completion and periodic reminders prior to warranty expiration. If contractor fraud or deficient work results in additional unmet need and the beneficiary remains otherwise eligible, the Program will evaluate the need for additional assistance in accordance with applicable federal requirements and funding availability.

10.2 Reporting Fraud

Any allegations of fraud, waste, abuse, or mismanagement related to CDBG-DR funds or resources must be reported to the Pinellas County Clerk of the Court and Comptroller Inspector General, directly to the OIG at HUD, or any local or federal law enforcement agency.

Any person, including any employee of the CDBG-DR Program, who suspects, witnesses, or discovers any fraud, waste, abuse, or mismanagement, relating to the CDBG-DR Program, should report it immediately to the Pinellas County Clerk of Court and Comptroller Inspector General Hotline by any of the following means:

Reporting Fraud, Waste and Abuse	
Phone	(727)-45FRAUD (453-7283)
Email	fraudhotline@pinellascounty.org
Internet	https://www.mypinellasclerk.gov/Home/Inspector-General#599117-report-fraud-waste--abuse
Mail	Public Integrity Unit Division of Inspector General 510 Bay Ave. Clearwater, FL 33756

Table 5: Reporting Fraud, Waste and Abuse

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

Reporting Fraud, Waste and Abuse	
HUD OIG Hotline	1-800-347-3735 (Toll-Free) (787)-766-5868 (Spanish)
Mail	HUD Office of Inspector General (OIG) Hotline 451 7th Street SW Washington, D.C. 20410
Email	HOTLINE@hudoig.gov
Internet	https://www.hudoig.gov/hotline

Table 6: HUD OIG

11 Complaints

Applicants may submit a complaint to the Program any time. In accordance with guidance outlined with Universal Notice, DRP will provide a timely written response to every written citizen complaint. Complaints will be addressed within **fifteen (15) working days** of receipt when practicable. If a complaint cannot be addressed **within fifteen (15) working days**, DRP 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 DRP may do so through any of the following avenues:

- Via Email: peoplefirst@pinellas-recovers.com
- In Writing: 200 Mirror Lake Dr. N, St. Petersburg, FL 33701

Although formal complaints must be submitted in writing, complaints may also be received verbally and by other means necessary, as applicable, when it is determined that the citizen's particular circumstances do not allow the complainant to submit a written complaint. These alternate methods include, but are not limited to:

- Via telephone: (727)-606-3307
- In person at any People First Hurricane Recovery Program Intake Center

Office Location	Operating Hours
2600 McCormick Drive - Suite 100 **Clearwater, FL 33759**	Monday through Friday, 8 a.m. to 5 p.m.

5000 Park Street - Suite 4 **St. Petersburg, FL 33709**	Monday through Friday, 8 a.m. to 5 p.m.

Table 7: Office Hours

12 Appeals

Applicants who wish to contest a Program determination may request an initial appeal directly with the Program by submitting a written request via electronic or postal mail within **thirty (30) calendar days** from the date of the determination being contested. Applicants may request an appeal at any point prior to execution of Grant Agreement to contest:

- Eligibility determination;
- Duplication of Benefits Gap determination;
- Award Type Determination;
- Program Scope of Work; or
- Recapture Amount.

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

- Via Email: peoplefirst@pinellas-recovers.com
- In Writing: 200 Mirror Lake Dr. N, St. Petersburg, FL 33701

The DRP 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 fifteen (15) business days. Applicants will be notified in writing of the determination made on their initial appeal via an Initial Appeal Determination Notification.

Program requirements established by Pinellas County and approved by HUD as dictated by law may not be waived or abrogated.

Applicants who choose to file a request for appeal are encouraged to provide individual facts or circumstances, as well as supporting documents to justify their petition. In adjudication of the appeal, the Program will only review facts and information already included in an Applicant's file, unless the Applicant submits new documentation. The Program has the discretion to accept or reject new documentation based upon its relevance to the appeal.

Every complaint and inquiry will be included in a tracking system. Program staff will maintain electronic files that include:

- Name of the complainant and contact information;
- Date the complaint was received;
- Description of the complaint;
- Name of each person contacted in relation to the complaint;
- A summary of the result and the date of the response to complainant; and
- Explanation of the resolution of the file.

12.1 Suspected Irregularities Appeal

Suspected irregularities are signs, indications, or behaviors suggesting information in an application may be false, misleading, incomplete, or inconsistent. Pinellas County will attempt to resolve suspected irregularities throughout the eligibility process, however, should these irregularities remain unresolved, an Applicant may be deemed ineligible.

Applications deemed ineligible due to suspected irregularities may request an appeal of this determination:

- Via Email: peoplefirst@pinellas-recovers.com
- In Writing: 200 Mirror Lake Dr N, St. Petersburg, FL 33701

The Pinellas County Clerk of Court and Comptroller Office of Inspector General may be consulted regarding suspected irregularities. When practicable, the appeal determination will be made within ten (10) business days. Applicants will be notified in writing of the determination made via an Initial Appeal Determination Notification.

An Applicant can withdraw the request for appeal at any time by providing written notice to Pinellas County's People First Hurricane Recovery Programs of this decision. Such a written notice must be delivered to the address referenced above.

Applicants who choose to submit a request for appeal are encouraged to provide individual facts or circumstances, as well as supporting documents to justify their petition. In adjudication of the appeal, Pinellas County will only review facts and information already included in an Applicant's file, unless the Applicant submits new/additional documentation. Pinellas County has the discretion to accept or reject new documentation based upon its relevance to the appeal.

All appeal determinations made are final with no further administrative review and are not subject to judicial review.

13 Exceptions to Program Policies

The DRP Guidelines set forth the policy governing the Program and approved DRP Standard Operating Procedures (SOP) set forth the procedures by which policy will be enacted. The Guidelines and the SOPs are intended to guide Program activities and enforce compliance with applicable federal regulations. While Program Guidelines and SOPs govern the Program, neither should be considered exhaustive instructions for every potential scenario that may be encountered by the Program. At times, exception to Program policies and/or procedures may be warranted. All exception requests are reviewed and adjudicated on a case-by-case basis as need arises, at the sole discretion of Pinellas County. Exceptions may be granted to Program policy or process. However, exceptions to federal regulations, laws, or statutes shall not be authorized.

13.1 Exceptions to Program Policies and Maximum Assistance

Pinellas County may grant exceptions to certain DRP program policies, including exceptions to maximum assistance amounts, on a case-by-case basis when warranted by documented extraordinary circumstances. Exceptions will not be granted to federal statutory or regulatory requirements.

In evaluating an exception request, the Program will assess:

- The specific circumstances giving rise to the request;
- Whether the exception is necessary to address unmet disaster-related need;
- Whether the requested assistance amount is reasonable and cost-effective;
- Consistency with the Program's purpose, funding limitations, and HUD requirements.

All exception requests must be supported by written justification and cost reasonableness documentation and must be approved by authorized County officials. Approved exceptions will be documented in the applicant file and maintained for monitoring and audit purposes.

14 Program Income

Program Income (PI) is defined as gross income received by the grantee or subrecipients that is directly generated from the use of CDBG-DR funds that totals more than $35,000 over the life of the grant. Pinellas County will track, report, and use PI in compliance with HUD regulations to ensure that all funds are used for eligible activities that support disaster recovery.

14.1 Sources of Program Income

Program Income (PI) includes, but is not limited to, the following when CDBG-DR funds are used:

- Proceeds from the disposition by sale or long-term lease of real property purchased or improved
- Proceeds from the sale or lease of equipment purchased
- Gross income from the use or rental of real or personal property
- Net income from the use or rental of real property
- Payments of principal and interest on loans
- Proceeds from the sale of loans
- Proceeds from the sale of obligations secured by loans

Program Income also includes the following:

- Interest earned on program income pending disposition of the income, including interest earned on funds held in a revolving fund account
- Funds collected through special assessments made against nonresidential properties and properties owned and occupied by households not low- and moderate- income, where the special assessments are used to recover all or part of the CDBG-DR portion of a public improvement.
- Gross income paid to a state, local, or a subrecipient thereof, from the ownership interest in a for-profit entity in which the income is in return for the provision of CDBG-DR assistance.

The full definition of program income, including applicable exclusions, is provided in sections III.B.12.a. and III.B.12.b. of the Universal Notice (UN). All sources of PI will be documented and reported in the DRGR system.

14.2 Use of Program Income

Program Income will be used before drawing additional CDBG-DR funds from the grant allocation. Program Income may be used to fund additional single-family rehabilitation or reconstruction projects, support administrative costs (if allowable), or expand Program capacity.

14.3 Tracking and Reporting

Pinellas County will maintain a system for tracking the receipt, use, and balance of Program Income. This includes:

- Assigning Program Income to the appropriate activity in DRGR
- Maintaining supporting documentation for all Program Income transactions
- Ensuring that Program Income is used in a timely and compliant manner
- Including Program Income in financial reports and audits

14.4 Closeout Considerations

Program Income received after grant closeout must be returned to HUD or used in accordance with post-closeout agreements, as specified in HUD guidance. Pinellas County will ensure that any residual Program Income is managed in compliance with applicable federal requirements.

15 Pinellas County 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 Pinellas County's CDBG-DR grant. These policies and procedures are outlined in the Pinellas County CDBG-DR Grant Manual. This Manual covers topics such as: financial management, internal controls (2 C.F.R. §§ 200.302–200.345), civil rights, fraud, fair housing, conflicts of interest, recordkeeping, and others. The requirements described in the Pinellas County CDBG-DR Manual apply to all programs outlined in the Pinellas County Action Plan for Disaster Recovery and any amendments thereto, including DRP.

16 Closeout

Applications will be closed upon reimbursement payment to Applicant.

DRP staff 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 (QC) checkpoints and various approvals at specific stages. Because the case has undergone such 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.

17 Timely Expenditures and Performance Monitoring

In accordance with the CDBG DR Universal Notice, Pinellas County has established projected expenditures and outcomes for the Homeowner Rehabilitation/Reconstruction Program (HRRP). These projections are based on anticipated quarterly performance beginning with the quarter in

which funds are made available to the County and continuing through full expenditure of allocated funds.

Pinellas County will monitor actual expenditures and program outcomes against these projections on a quarterly basis to ensure timely obligation and expenditure of CDBG DR funds. Monitoring will include internal financial and performance reviews, reconciliation of production metrics (applications, awards, construction starts, and completions), and corrective actions as necessary to address delays or performance risks.

Projected expenditures and outcomes will be uploaded into HUD's Disaster Recovery Grant Reporting (DRGR) system and posted on the County's public disaster recovery website in accordance with Universal Notice requirements. Updates to projections will be made as necessary to reflect material changes in program performance, funding availability, or implementation timelines

18 Appendix A – Definitions

Area Median Income (AMI): The median (middle point) household income for an area adjusted for household size as published and annually updated by the United States Department of Housing and Urban Development (HUD).

Applicant: Any individual who applies for assistance to the Disaster Relief Program

CDBG-DR: Community Development Block Grant-Disaster Recovery.

Duplication of Benefits (DOB): A Duplication of Benefits (DOB) occurs when a person, household, business, or other entity receives disaster assistance from multiple sources for the same recovery purpose, and the total assistance received for that purpose is more than the total need.

Duplication of Benefits (DOB) Gap: DOB Gap is the total amount of excludable and non-excludable benefits received less the dollar amount of excluded benefits (excludable benefits).

Federal Register: The official journal of the Federal government of the United States that contains government agency rules, proposed rules, and public notices. It is published daily, except on Federal holidays. A Federal Register Notice (FRN) is issued for each CDBG-DR funded disaster. The FRN outlines the rules that apply to each allocation of disaster funding.

Financial Hardship: A condition in which a household experiences a verifiable loss or reduction of income, increase in necessary expenses, or other storm-related economic disruption directly resulting from a Presidentially declared disaster. Financial hardship may include job loss, business closure, reduction in work hours, unpaid leave, temporary displacement, or other documented circumstances that impair the household's ability to meet essential expenses such as rent, mortgage, or utilities.

Household: A household is defined as all persons occupying the same housing unit, regardless of their relationship to each other. The occupants could consist of a single-family, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

HUD: United States Department of Housing and Urban Development.

Low- to Moderate-Income (LMI): Households whose total annual income does not exceed 80 percent of the area median income (AMI), adjusted for household size, as determined annually by HUD for Pinellas County. LMI households may include Extremely Low-Income (≤30 percent AMI), Very Low-Income (≤50 percent AMI), and Low-Income (≤80 percent AMI) households.

Low- to Moderate-Income (LMI) National Objective: Activities that benefit households whose total annual gross income does not exceed 80% of Area Median Income (AMI), adjusted for family size. Income eligibility will be determined and verified in accordance with HUD Guidance.

Owner-Applicant Household: Applicants who owned their home at the time of the storm and continue to own their home at the time of application to the Program.

Program Income: The gross income received by Pinellas County or its subrecipients directly generated from the use of CDBG-DR funds. This includes, but is not limited to, repayments of loans, interest earned on program accounts, or proceeds from the sale or lease of property purchased or improved with CDBG-DR funds. Program income must be used before requesting additional grant funds and managed in accordance with 2 C.F.R. § 200.307(e) and HUD's April 2025 CDBG-DR Universal Notice, Section III.A.6.f.

Rental Applicants: Applicants who did not own a home at either the time of the storm or at the time of application.

Recapture: The process by which Pinellas County recovers CDBG-DR funds from an Applicant or subrecipient that has received assistance to which they were not entitled, or has failed to comply with the terms and conditions of their agreement, including failure to meet eligibility, occupancy, affordability, or other program requirements. Recapture may occur due to fraud, misrepresentation, ineligibility, or duplication of benefits and shall be conducted in accordance with 2 CFR § 200.346, HUD's April 2025 CDBG-DR Universal Notice (Section III.A.6.f), and the Pinellas County CDBG-DR Grant Manual. All recaptured funds are treated as Program Income and must be returned to the CDBG-DR account or to HUD, as applicable.

Subrogation Agreement: A legally binding document executed by the Applicant and Pinellas County that requires the Applicant to repay duplicative assistance received after a CDBG-DR award has been made. The agreement ensures compliance with the Duplication of Benefits (DOB) requirements under Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5155) and HUD's April 2025 CDBG-DR Universal Notice, Appendix C.

Utilities: Basic, essential residential services necessary to ensure safe and habitable housing, which include natural gas, electric, propane, water, sewer, and trash collection.