People First Hurricane Recovery Program

Homebuyer Assistance Program (HBA)

Program Guidelines

October 27, 2026

Version 2.0

Version Control

Version Number	Date	Summary of Changes	Approved By
1.0	December 1, 2025	Original version	Pinellas County
2.0	October 27, 2026	Added language to require copy of appraisal and appraisal contingency (7.1); made a distinction that condominiums must be warrantable (4.4); updated inspection requirements (12.2); updated SAVE requirements (3.1). Added the following required sections: Timely Expenditures and Performance Monitoring (2.6); Fraud, Awareness, Prevention, and Beneficiary Assistance (15.1); and Exceptions to Program Policies and Maximum Assistance (18.1)	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 renters, first-time homebuyers, and disaster-impacted households under Pinellas County's People First Hurricane Recovery Program known as the Homebuyer Assistance Program (HBA). These Guidelines were developed to serve as a basis for the Homebuyer Assistance Program 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 applicants, and other interested parties who want to understand how the Program operates. Note that this Program Guideline is only intended to address the Homebuyer Assistance Program (HBA). Each of the other housing recovery programs under the Pinellas County People First Hurricane Recovery Program 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 (CDBG-DR) 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 notice (90 FR 4759) 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 Recovers. Pinellas County has allocated $20,000,000 in CDBG-DR funding for the Homebuyer Assistance Program (HBA) which will serve low- to middle-income renters in transitioning to homeownership.

The Action Plan's unmet needs assessment showed that many residents affected by Hurricane's Idalia, Helene, and Milton in 2023 and 2024 continue to face serious challenges with housing stability and long-term affordability.

2 Program Overview

The Homebuyer Assistance Program (HBA) provides housing assistance to eligible low- to middle-income renters, at or below 120% of the area median income, within Pinellas County, excluding residents of the City of St. Petersburg, transitioning to homeownership following Hurricanes Idalia, Helene, and/or Milton in 2023 and 2024. HBA assists applicants in purchasing a new home in Pinellas County, including the City of St. Petersburg.

HBA is centrally administered by Pinellas Recovers and serves low- to middle-income renters impacted by Hurricanes Idalia, Helene, and/or Milton. HBA is a CDBG-DR eligible activity that will be undertaken in accordance with 24 CFR 570.201(d) and Section III.D.5.d of the Universal Notice.

Due to funding limitations and other factors, HBA cannot guarantee assistance to all interested disaster-impacted households, however, the Program endeavors to serve as many eligible

Pinellas County residents as it can with available funds. To ensure the most vulnerable households have reasonable opportunity to participate, HBA prioritizes assistance to those who suffered a demonstrable hardship from the hurricanes.

HBA assistance is structured as a forgivable second mortgage, recorded at closing and contingent upon continued occupancy and compliance with the Program requirements; funds will not be distributed to homeowners directly but will be provided to the title company at closing. Eligible property activities may include:

- Subsidized interest rates and mortgage principal amounts
- Reasonable closing costs, normally associated with the purchase of a home
- Providing up to 100 percent of any lender required down payment
- Acquiring guarantees for mortgage financing obtained

This program is designed to ensure that the housing needs of the target homebuyer population in Pinellas County are addressed through aiding them with the opportunity to achieve homeownership.

2.1 National Objective

Activities funded through HBA will primarily meet the HUD National Objectives of providing benefit to Low- and Moderate-Income Housing (LMH) and Urgent Need (UN). Disaster-impacted households often face compounded challenges, including displacement, rising rents, and limited access to affordable housing stock. By offering assistance to transition from renting to ownership, Pinellas County is helping to stabilize Low-to Middle-Income (LMI) households and reduce exposure to natural hazards. The program will focus on LMI disaster-impacted renter households who may otherwise be priced out of the ownership market.

2.2 Mitigation Activities

The Homebuyer Assistance Program (HBA) is structured with mitigation as a core objective. It advances the Grantee's hazard mitigation and resilience strategy by lowering households' exposure to present and future disaster risks, consistent with the Mitigation Needs Assessment outlined in the approved Action Plan. Through the provision of financial incentives, the Program facilitates home purchase assistance into safer, more resilient housing areas outside of special flood hazard areas (SFHAs).

The HBA serves as a complementary and proactive mitigation tool by shifting residential occupancy away from high-risk zones. This reduces the concentration of populations exposed to risks and physical assets in hazard-prone areas, lessens the potential for future disaster-related damage, and supports long-term community resilience. Every home purchase supported by this Program represents a permanent reduction in risk exposure, consistent with Pinellas County's broader mitigation and recovery goals.

2.3 Tieback

The Homebuyer Assistance Program is designed in direct response to the already existing severe shortage of affordable housing worsened by the disasters. These disasters resulted in significant damage to the local housing stock, increasing displacement and reducing homeownership

opportunities. This Program supports recovery efforts by helping renter households, particularly those with a demonstrable impact as a result of the qualifying disaster(s), access safe, affordable, and resilient homeownership options, contributing to the stabilization and rebuilding of the community's housing market.

2.4 Eligible Location

The Applicant must have maintained their primary residence in Pinellas County, outside of the City of St. Petersburg, at the time of the qualifying event(s). Qualifying renters located in the City of St. Petersburg at the time of the qualifying event(s) are not eligible, as the City is administering its own CDBG-DR funded housing programs.

2.5 Minimizing Displacement and Relocation

Pinellas Recovers will seek to minimize displacement consistent with the goals and objectives of activities funded under the Housing and Community Development Act (HCDA) and the recovery and mitigations goals of the CDBG-DR Universal Notice. The County will also coordinate with local municipalities and other local-level authorities to minimize the direct and indirect displacement of individuals, families, businesses, farms, and nonprofit organizations, recognizing the significant challenges displacement can cause. Homebuyer Assistance Program (HBA) activities consist of voluntary, arms-length transactions between willing buyers and sellers. Therefore, the acquisition requirements of the Uniform Relocation Assistance and Real Property Policies (URA) do not apply under 49 CFR 24.101(b)(2). URA displacement requirements would only apply if a covered activity, such as the demolition or conversions of low- to moderate income (LMI) housing units, is triggered. In such cases, the County will comply with all applicable URA provisions and its Residential Anti-Displacement and Relocation Assistance Plan (RARAP).

2.6 Timely Expenditures and Performance Monitoring

In accordance with the April 2025 CDBG-DR Universal Notice, Pinellas County has established projected expenditures and outcomes for the Homebuyer Assistance Program (HBA). 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 (recover.pinellas.gov) 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.

2.7 Award Caps

The maximum award granted for homebuyer assistance is $80,000. The Program will determine the amount of assistance per application based on Applicant's need. Depending on Applicant's need, the assistance can be used for the following:

- subsidize interest rates and mortgage principal amounts;
- provide up to 100% of any down payment required from homebuyers; and/or
- pay reasonable closing costs (normally associated with the purchase of a home).

The Program may provide additional subsidies to ensure an Applicant's monthly housing payment does not exceed 35% of the household's gross monthly income, however, the maximum award of $80,000 per application will not be exceeded. The County may approve exceptions to increase the front-end ratio requirement to a maximum of 37% on a case-by-case basis for compensating for risk factors of no other debt **and** a minimum middle credit score of 750. The request for a Program exception must be requested in writing by the Applicant's lender with documentation to support the compensating factors. Upon receipt of the lender's complete exception request package, program staff will review the submitted documentation for completeness and eligibility and will process the exception request in the program's system of record in accordance with established program procedures. Program staff will document the basis for the exception request, the supporting compensating factors, and the final determination within the system of record.

There is no allotted minimum award for this Program. The intent of the Program is to provide Applicants with the amount necessary, not to provide a standard subsidy for all Applicants.

2.8 Underwriting Policy

- **Affordability Standard**: Monthly housing costs (principal, interest, taxes, and insurance) shall not exceed 35% of the borrower's gross monthly income.
- **Lender Requirements:** Participating lenders must underwrite borrowers to the maximum affordable mortgage amount in accordance with Program guidelines before the HBA is applied.
- **Use of HBA assistance:** The HBA may only be applied after the borrower's affordability has been maximized through first mortgage financing. Assistance is intended to close the affordability gap, not to reduce the borrower's qualifying loan below their capacity.
- **Oversight:** The HBA Program will coordinate with lenders to verify compliance with these requirements and to ensure consistent application of affordability standards.

2.9 Social Media

Pinellas Recovers will also use official social media channels to provide timely, accessible updates regarding key program milestones, including the opening of the Homebuyer Assistance Program 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

2.10 Rapid Unsheltered Survivor Housing (RUSH) Alignment

The Homebuyer Assistance Program (HBA) will be implemented in alignment with HUD's Rapid Unsheltered Survivor Housing (RUSH) policy framework, where applicable. RUSH provides guidance and flexibility to accelerate housing solutions for disaster-impacted individuals and households experiencing or at risk of unsheltered homelessness following a federally declared disaster.

To support HUD's RUSH objectives, the Program will:

- Coordinate with emergency shelter providers, local Continuums of Care (CoCs), and homeless service organizations to identify residents who may be unsheltered or displaced due to the disaster and who reside in areas eligible for First-Time Homebuyer Opportunities;
- Prioritize application processing and service referrals for applicants at risk of homelessness due to disaster-related housing instability, particularly in high-risk zones or repetitive loss areas targeted for homebuyer opportunities;
- Allow for strategic integration of other eligible assistance to support smooth transitions into safer, long-term housing options;
- Ensure that home purchase activities are impact-informed, with attention to those facing compounded housing stabilization challenges.

In addition, the program will align with RUSH goals by:

- Reducing displacement risks associated with the loss of naturally occurring affordable housing (NOAH) in buyout areas;
- Working with local and regional partners to expand access to temporary, transitional, and permanent housing resources, including Housing Choice Vouchers and supportive housing where available;
- Incorporating RUSH-aligned practices into outreach, application intake, case management, and program communications.

This alignment ensures that the HBA Program not only mitigates long-term risk through home purchase assistance but also contributes to the urgent housing stabilization and shelter needs of disaster-impacted populations.

As evidence of the County's alignment of the Homebuyer Assistance Program (HBA) with RUSH, the County will document its actions, data, and outcomes of all initiatives by:

- Tracking referrals from shelters, CoCs, or homeless service organizations into the Homebuyer Assistance Program.
- Maintaining intake logs that note whether applicants were identified through the RUSH framework (e.g., unsheltered, displaced, disaster-related instability).
- Recording instances where applicants received layered support (e.g., rental assistance, counseling, relocation help) in addition to homebuyer assistance.
- Keeping agendas, meeting minutes, and attendance records from coordination meetings with RUSH partners.
- Developing reports showing:
    - Number of applicants identified through CoCs/shelters.
    - Outcomes (e.g., successful closings for previously unsheltered households).

3 Intake Application

Individuals interested in assistance may apply for the Homebuyer Assistance Program (HBA) via the following methods.

- Complete a People First Hurricane Recovery Program application online at: https://recover.pinellas.gov/.
- Call our Help Center (727)-606-3307 to be connected to a Program Specialist
- Visit any People First Hurricane Recovery Program Intake Center at the addresses/times below[1].

Office Location	Operating Hours
Clearwater 2600 McCormick Dr. Suite 100 Clearwater, FL 33759	Monday - Friday: 8 a.m. to 5 p.m.
St. Petersburg 5000 Park Street N Suite 4	Monday - Friday: 8 a.m. to 5 p.m.

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

St. Petersburg FL 33709

Table 1: Intake Center Operating Hours

Applicants will be required to complete an HBA intake application and provide supporting documents required for eligibility review, income verification, duplication of benefits review, and mortgage readiness. Applicants must be able to obtain mortgage pre-approval to be eligible for assistance. HBA is intended to provide funding necessary to cover any gap that may exist between the purchase price of the home minus the amount an Applicant can receive as a first mortgage, up to $80,000; however, assistance may also be used to cover other eligible expenses, such as closing costs or mortgage rate buydown/discount points. As such, all documentation submitted by the Applicant must be valid at the time of submission and representative of the Applicant's current state of mortgage readiness. All documentation submitted by the Applicant must be valid at the time of submission. The application process will require each Applicant to authorize HBA to obtain 3rd-party data by signing a consent/release form. Program Specialists will collect documents needed to determine eligibility and which Program benefits the applicant may be eligible to receive[2].

Program Specialists 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 Program Specialist. Each Program Specialist has a direct email and phone line at which he/she can be reached. Applicants are provided direct contact information for the Program Specialist 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 HBA. 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., Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794), and the Americans with Disabilities Act (ADA) of 1990, as amended. Applicants who require assistance due to language, disability, or other access barriers may

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

request reasonable accommodations. Reasonable accommodations and auxiliary aids will be provided upon request to ensure full participation in all stages of the program, including intake, eligibility review, and closing.

3.1 Applicant Identification and Citizenship/Immigration Status

3.1.1 Identification

Applicants and adult household members or aged 18 or older will be required to submit a valid photo identification. Expired photo identification will not be accepted. Forms of identification accepted by HBA are:

- 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. Birth certificates must be submitted for all household members seventeen (17) and younger. If an Applicant is unable to produce a birth certificate 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 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.

Citizenship:

Applicants and/or Co-Applicants who report that 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.

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 HBA. 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. HBA 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:** A Co-Applicant must be an adult and must agree to occupy the CDBG-DR assisted residence as their primary residence for the 5-year compliance period. Co-Applicants will have the same authority over the HBA 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 HBA application.

- **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 HBA application. HBA shall be authorized to share information with the Communication Designee, but the Communication Designee is not authorized to make any decisions regarding the HBA application or affect the HBA application on the Applicant's behalf.

However, only the Power of Attorney duly authorized to do so may sign documents, make agreements or decisions, or otherwise act unilaterally on behalf of an applicant.

3.2 Required Applicant Certifications

As part of the HBA 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 HBA and for purposes of progressing his/her case through HBA
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 HBA after provision of assistance through HBA 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.
No Income Certification (as applicable)	Self-certification confirming that the applicant, co-applicant, or adult household member who claimed zero income attests that he/she does not earn income.

Table 2: Applicant Certifications Collected at Intake

3.3 Order of Assistance (Prioritization)

Applicants to the Homebuyer Assistance Program will be processed on a first-come, first-processed basis. Assistance will be prioritized to those Applicants with a demonstrable impact as a result of Hurricane's Idalia, Helene, and Milton in 2023 and 2024 based on the following:

Phase	Criteria
Phase I	Demonstrable Impact: ○ Loss of income/wages ○ Displacement ○ Storm Damage ○ Other: _____
Phase II	All other applicants

Table 3: Application Prioritization

3.4 Income Eligibility

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 Homebuyer Assistance Program. The IRS Form 1040 method of calculating income is often referred to as the Adjusted Gross Income or AGI method.

All household members included in the AGI calculation, if required to file, must provide a copy of their 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 the 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 has 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 (≤ 120 % 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:

- **IRS Verification of Non-filing:** Official proof from the Internal Revenue Service (IRS) confirming that the individual did not file a return for the prior tax year. You can obtain this transcript directly through the IRS Get Transcript service.
- **Wages**: Three (3) recent paystubs within the past three (3) months, W-2 forms;
- **Retirement or Social Security**:
    - Current Social Security Benefits letter (including benefits paid to minors); **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;
- **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.

3.4.1.1 Household Definition

For the purposes of the Homebuyer Assistance Program, a household is defined as all persons (minors and adults) who will occupy the newly purchased home as their primary residence. Household income is based on the total adjusted gross income of all household members, consistent with HUD requirements. A household may consist of a single family, multiple families living together, or any group of related or unrelated individuals who share the housing unit as their residence.

HBA 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 members 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.

In the event that one of the following special circumstances applies, the income of the referenced individuals 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 Eligibility Requirements

The Homebuyer Assistance Program (HBA) applicants will be screened for eligibility to ensure compliance with HBA 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 HBA, then they may be required to make full restitution to Pinellas County, including but not limited to, administrative cost incurred by the Program and any other costs associated with the improper award.

Below are the threshold eligibility requirements 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 HBA is subject to limited funding.

All applicants to HBA must demonstrate compliance with all of the following eligibility criteria:

- The applicant must have maintained their primary residence in Pinellas County, outside of the City of St. Petersburg, at the time of the qualifying event(s). Eligible renter households located in the City of St. Petersburg are not eligible as the City is administering its own CDBG-DR funded housing programs.
- Homebuyers must purchase an eligible structure type: Single-Family (1 unit structure, or one unit within a multi-unit structure such as a duplex, triplexes, warrantable condominium, etc.), or Modular, Manufactured Home, less than 5 years old). All eligible structures must be located outside of a Special Flood Hazard Area (SFHA) within Pinellas County which includes the City of St. Petersburg.
- Total household income must be below 120% Area Medium Income (AMI).
- Homebuyers must be able obtain first mortgage pre-approval for a minimum 30-year fixed-rate mortgage from an approved lending institution (no ARM, no balloon mortgages allowed, and no prepayment penalties allowed) or must be able to show proof of enrollment with 14-days of eligibility determination in a HUD-approved pre-purchase counseling course as a demonstrated effort towards becoming mortgage ready. Proof of enrollment does not guarantee a commitment of funds.
- Homebuyers must not own other residential structures at the time of application. The County may approve exceptions to this requirement on a case-by-case basis, in limited circumstances, such as when an applicant has inherited partial ownership of a property that is not used as their primary residence. In such cases, applicants must provide acceptable documentation (e.g., probate records, deed, or affidavit of non-occupancy) to verify eligibility. 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.

- Homebuyers must not have entered into a purchase agreement or contract for a home at time of application.

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 not own other residential property at the time of application	• Attestation of non-ownership The Program will complete a title search via third-party data sources
Must be able to obtain first mortgage or show enrollment in pre-purchase counseling with a HUD-approved counseling agency	• Current (no more than 60 days prior to application date) pre-approval or loan commitment with required lending terms (30-year fixed rate from financial institution. • Must be able to show proof of enrollment in pre-purchase counseling with a HUD-approved housing counseling agency within 14 days of eligibility determination.
Must have maintained their primary residence in Pinellas County, outside of the City of St. Petersburg, at the time of the qualifying event(s)	• Copy of a lease agreement in the name of the Applicant, and/or Co-Applicant, if applicable, showing address within Pinellas County, outside of City of St. Petersburg at the time of the qualifying storm(s), in August 2023 or September 2024, or October 2024. OR 2 of the following: • Utility bill in the name of the applicant, or co-applicant, showing an address within Pinellas County, outside of City of St. Petersburg at the time of qualifying storm(s), in August 2023 or September 2024, or October 2024. • Evidence of a FEMA IA award letter in the name of the Applicant or Co-Applicant at an address within Pinellas County, outside of the City of St. Petersburg, referencing the storms caused by Hurricane Idalia, Helene and/or Milton; • Driver's license or state-issued ID card showing an address within Pinellas County,

Eligibility Criterion	Document(s) Required
	outside the City of St. Petersburg; issued or replaced prior to the date of the hurricane and expiring after; • Credit card bill or bank statement sent to the Applicant at the storm-impacted property address in the month preceding or the month of the disaster; • Employer's statements, including pay stubs and similar employment documents (must be dated in the month preceding or month of the disaster) • Other documents may be considered on a case-by-case basis

Table 4: Accepted Method(s) of Verification of Eligibility Criteria for Applicants

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

4.1 Primary Residence

HBA Applicants must provide documentation that establishes that their primary residence was located in Pinellas County, outside of the City of St. Petersburg, as of the date of Hurricane Idalia in August 2023, as of date of Hurricane Helene in September 2024, or as of date of Hurricane Milton in October 2024.

4.1.1 Documents Required

Documents provided to demonstrate primary residence should include the applicant or co-applicant's name, appropriate date demonstrating residence at the time of the hurricane, and storm-impacted property address. Acceptable documents include:

- A copy of a lease showing residency at a residential property within Pinellas County, outside of the City of St. Petersburg, FL in 2023, which was the year of Hurricane Idalia, or 2024, which was the year of Hurricanes Helene and Milton.

Or two (2) of the following documents:

- Utility bill in the name of the Applicant, or Co-Applicant, showing an address within Pinellas County, outside of City of St. Petersburg at the time of qualifying storm(s), in August 2023 or September 2024, or October 2024.
- Evidence of a FEMA IA award letter in the name of the applicant or co-applicant at an address within Pinellas County, outside of the City of St. Petersburg, referencing the storms caused by Hurricane Idalia, Helene and/or Milton;
- Driver's license or state-issued ID card showing an address within Pinellas County, outside of the City of St. Petersburg; issued or replaced prior to the date of the hurricane(s) and expiring afterward;

- Credit card bill or bank statement sent to the applicant at an address within Pinellas County, outside of the City of St. Petersburg in the month preceding or the month of the disaster;
- Employer's statements, including pay stubs and similar employment documents dated in the month preceding or month of the disaster that shows an address within Pinellas County, outside of the City of St. Petersburg;
- Other documents may be considered on a case-by-case basis

The Program will review and assess all available documentation together and determine primary residence based on the applicant's demonstration of consistency across the variety of documentation provided. In the event that inconsistencies in documentation are found, the application may not move forward in the eligibility process until the inconsistencies are resolved by the applicant. All applicants to the Program bear the burden of proof for providing consistent evidence to prove primary residency at the time of the disaster.

4.2 First Mortgage

Homebuyers must be able obtain a first mortgage pre-approval for a minimum 30-year fixed-rate mortgage from a lending institution. All co-borrowers/co-signers must be primary residents of the home and will continue to occupy the HBA Program assisted property. The income of all co-borrowers/co-signers must be included in the household income calculation for Program eligibility purposes.

Private individuals acting as mortgage lenders are not permitted under this Program. This includes seller-financing arrangements or loans originated by individuals not affiliated with a recognized financial institution, credit union, or government-backed lender (e.g., FHA, VA, USDA). The first mortgage loan must meet the following requirements to be eligible for the Program:

- Minimum 30-year term;
- Fixed-rate, no ARM, no balloon loans;
- No prepayment penalties;
- Property taxes and insurance must be escrowed.

4.3 Purchase Property Must be Located in Pinellas County, Florida

To be eligible, the property must be located in Pinellas County, Florida, which also includes the City of St. Petersburg. The Program will verify the property location using the property address and GIS coordinates/mapping if needed.

4.4 Eligible Structure

To be eligible for HBA assistance, the property must be an eligible structure type. Eligible structure types for purchase include:

- Single-family stick-built/Concrete block homes;
- Modular, manufactured homes, 5 years or less in age, outside of a Special Flood Hazard Area (SFHA), affixed to the land;
- Duplexes, Triplexes, Quadplexes; are eligible for purchase, however, only **one** unit within these multifamily structure types can be purchased.

- Warrantable Condominiums.

Additional structure requirements include:

- Ready – meaning not having any remaining storm or other damage at the time of closing.
- Vacant – Only vacant properties, or properties that are owner-occupied are eligible for purchase under this program. Properties must be vacant or occupied by the owner at the time of execution of the contract for sale and purchase.

4.5 Ineligible Structures

The following structure types are ineligible for HBA assistance:

- Garages, sheds, and outbuildings;
- Recreational Vehicles and camper trailers;
- Houseboats.

5 Homebuyer Education Course Requirement

As part of an application, all applicants, co-applicants and anyone who will be on the property deed are required to attend a Homebuyer Education Workshop with a HUD-approved housing counseling agency. The Program allows any HUD-approved Housing Counseling Agency to provide the required homebuyer education workshop. All applicants will need to provide a copy of the completed homebuyer education course certification prior to being provided with a letter of eligibility. Costs associated with the homebuyer education course are not covered by the Program. Applicants will be required to pay all fees associated with the course. Costs associated with the course are to be determined by program administrator. Homebuyer Education certificate must be valid at time of and throughout application. Applicant will be required to provide an updated certificate if their current certificate expires prior to closing on an eligible residence.

6 Compliance Period

Annual monitoring of properties will occur during the five-year period of the second mortgage term following the home purchase.

Applicants assisted under HBA must agree to own the purchased home and occupy the home as their primary residence for a period of **five (5) years** after purchase. This period constitutes the compliance (affordability) period required under 24 CFR § 570.503(b)(7). Pinellas County will conduct annual monitoring throughout the five-year term to verify continued occupancy. The compliance period will be secured through a recorded mortgage and promissory note executed in the official records of Pinellas County at the time of closing.

If an applicant sells the home or discontinues use of the home as a primary residence within the **five (5) year** affordability period, the applicant may be subject to repay all or a portion of the grant forgivable loan amount. The amount of assistance that is subject to repayment if the applicant breaks the terms of the compliance period will be determined by straight-line, linear, annual amortization schedule of the grant over the five-year compliance period. The table below outlines the repayment schedule should the applicant sell the property or fail to occupy the home as a primary residence during the five (5) year affordability period.

Date of Compliance Breach	Amount of Repayment Due to Pinellas County
Month 0 – Month 12	100% of grant award
Month 13 – Month 24	80% of grant award
Month 25 – Month 36	60% of grant award
Month 37 – Month 48	40% of grant award
Month 49 – Month 60	20% of grant award
61 months or beyond	0% of grant award

Table 5: Repayment Schedule

Enforcement of these requirements will be secured through a recorded lien, restrictive covenant, or other enforceable legal instrument, consistent with 24 CFR. § 570.503(b)(7). The County will issue a Satisfaction of Mortgage upon verification that the compliance period has been successfully completed.

If the requirements for maintaining primary residence of the purchased home are met, the Program will provide the applicant(s) with a Satisfaction of Mortgage releasing the HBA second-mortgage lien. Under these circumstances only, the applicant(s) will not be required to pay back any portion of the second mortgage.

If the applicant(s) do not meet the requirements during the 5-year term, the prorated balance of the second mortgage will be due in full. Instances in which this may apply include the sale, transfer, lease, unapproved refinance of the first mortgage, or any change to owner-occupancy status.

HBA may grant forgiveness of the compliance period terms in the following extenuating circumstances. In all cases, the applicant or the applicant's designee must notify Pinellas Recovers as soon as the circumstance occurs so that the County may process the request and prepare the necessary Satisfaction of Mortgage (SOM) to release the lien when applicable.

- **Death of the Applicant:** If the applicant dies during the compliance period, the terms of the compliance period are forgiven. Surviving family members or heirs are not responsible to uphold ownership or primary residence requirements.
- **Military Transfer or Deployment:** If the applicant is transferred or deployed due to military service for a period of time that would prevent him/her from upholding ownership and primary residence occupancy of the storm-impacted home, the applicant is expected to notify Pinellas County of the deployment or transfer. Compliance period requirements will be forgiven upon notification by the applicant to Pinellas County.
- **Permanent Placement in a Healthcare Facility or Nursing Home:** If the applicant must be moved to a permanent healthcare facility or nursing home due to health conditions, the applicant or applicant's designee is expected to notify Pinellas County. Compliance period requirements will be forgiven upon notification by the applicant to Pinellas County.

- **Incarceration**: If the applicant becomes incarcerated for a period of time that extends for the remainder of the compliance period or otherwise makes it impossible for the applicant to meet the primary residence requirement, the applicant or applicant's designee must notify Pinellas County. Short-term or temporary incarceration does not qualify for forgiveness. Forgiveness may be granted only when the incarceration constitutes an extenuating circumstance beyond the applicant's control and prevents compliance for the duration of the remaining term. Upon approval, Pinellas County will process the Satisfaction of Mortgage (SOM) to release the lien.
- **Other Circumstances Beyond the Applicant's Control:** Other circumstances that prevent the applicant from maintaining ownership or occupancy may be considered on a case-by-case basis. The applicant or designee must notify Pinellas County so that the County can evaluate the situation and, if approved, prepare the SOM.

7 Mandatory Second Mortgage

A 5-year, zero interest, zero-payment second mortgage will be placed on the property being purchased through the Program for recapture purposes. The second mortgage will be self-amortizing and will reduce at a rate of 20 percent (20%) per year after the home purchase as part of the requirement that homebuyers agree to occupy the property as their primary residence, maintain a homestead exemption, and maintain required insurance coverage during the 5 years after home purchase.

7.1 Subordination

The Program will review all subordination requests for the purposes of refinance on a case-by-case basis according to the subordination policy below, however, subordination requests are not guaranteed.

7.1.1 Reasons for Subordination

The general policy regarding subordination for the program is to not subordinate loans. No cash out refinancing is allowed. Subordination for refinancing may be allowed for the following reason(s) on a case-by-case basis, as part of the Exception Process:

- To enable the homeowner to obtain a lower rate on their primary (first) mortgage and thus a lower overall monthly payment. No cash out will be allowed during this refinancing.
- To enable the homeowner to avoid foreclosure.

The Program will not consider subordination for home equity loans or lines of credit.

7.1.2 Requests for Subordination

For subordinations to be considered, the lender must include:

- A letter requesting a subordination. The letter must include a comparison of the existing and the proposed new mortgage (which should include the new mortgage amount, term, interest rate, and PITI) and indicate no cash out to borrower.
- Copy of the Loan Estimate

- Copy of the Appraisal

These items will be submitted to the Program for review and approval. If the subordination request is approved, the Program will notify the lender, homeowner, and the title company through written notification. Once approved, the title company will need to provide a copy of the subordination agreement to the Program for routing to the County for execution. Please allow up to 30 days to receive the original subordination agreement. A copy will be uploaded to the homeowner's file in the Program's system of Record

8 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 and other federal regulations at 2 CFR § 200.1122, CFR 200.318(c), and 24 CFR §570.611 200.318(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, or partner 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 HBA 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 HBA 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 HBA to determine if said relationship constitutes a conflict of interest as outlined in HUD conflict of interest regulations, at 24 CFR §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 HBA.

9 Duplication of Benefits (DOB)

The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, specifically Section 312 (42 U.S.C. § 5155, prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss as to which they have received financial assistance under any other program, from private insurance, charitable assistance, or any other

source. The Program must evaluate all assistance received by applicants from federal, state, local, insurance, charitable or any other source and determine if any assistance is duplicative. Any assistance determined to be duplicative must be deducted from the Program's calculation of the Applicant's unmet need before awarding assistance. The DOB review performed by the Program, or its authorized representative assures compliance with Section 312 of the Stafford Act by confirming that CDBG-DR funds are used only to address eligible unmet needs and are not provided for costs already covered by other sources.

The Program will also review assistance provided through the Pinellas County State Housing Initiatives Partnership (SHIP) Income-Eligible Hurricane Home Repair Program and other locally administered recovery programs to ensure that CDBG-DR funds provided under the HBA do not duplicate benefits previously provided for the same purpose. If duplication is identified, the HBA award will be adjusted or reduced in accordance with Section 312 of the Stafford Act and HUD's April 2025 Universal Notice, Appendix C.

To ensure the Program does not provide a duplication of benefits, the HBA Program will adhere to the following process:

1. Identify the Applicant's total need;
2. Identify total assistance available;
3. Identify the Amount to Exclude as Non-Duplicative (Amounts used for a different purpose, or same purpose, different allowable use);
4. Identify Total DOB Amount (Total Assistance Minus Non-Duplicative Exclusions);
5. Calculate Maximum Award (Total Need Minus Total DOB Amount); and
6. Final Award (Program Cap = Final Award if Maximum Award is equal to or greater than the Program Cap).
7. Reassess unmet need if additional assistance becomes available.

Because the HBA Program requires eligible applicants to be renters at the time of application, it is expected that most applicants will not have received any benefits from other sources for the purposes of homebuyer assistance. Nonetheless, the Program will perform the due diligence of a DOB review and ensure that Program beneficiaries do not receive duplicative, unnecessary, or unreasonable assistance.

In cases where an applicant has previously received Federal Emergency Management Administration (FEMA), Small Business Administration (SBA), and/or any other funds for the purpose of using them to purchase residential properties, those funds will be considered as a DOB under this Program. These funds will be deducted from the total unmet need determination as part of the underwriting review. No program funds will be used for activities reimbursable by, or for which funds are made available by, FEMA or the U.S. Army Corps of Engineers (USACE).

The following are examples of assistance sources that may be reviewed and considered as potential duplications:

9.1 Federal Emergency Management Administration Individual Assistance (FEMA IA) or Housing Assistance (HA)

FEMA Individual Assistance (FEMA IA) will be determined and verified by the Program through the FEMA database. If the Program or an authorized representative cannot verify the FEMA IA amount through the FEMA database, the Program will use the payment amount provided by the applicant at the time of application. An applicant can provide documentation demonstrating that the FEMA IA amount provided by the FEMA database includes amounts not paid to cover the structural loss. In such case, the Program or an authorized representative will use the documentation provided by the applicant to adjust the FEMA IA amount considered in the DOB analysis. The documentation supplied by the applicant must come from FEMA. Typically a renter applicant will not receive a FEMA IA amount for structural loss as most renter applicants will not have owned a property that would qualify them for a structural loss award, however, because the HBA Program is open to renters who may have owned at the time of the qualifying disaster event(s), this could potentially occur.

9.2 Private or Flood Insurance Proceeds

Eligible rental applicants who are in receipt of insurance settlements for loss of dwelling will have that amount deducted from the Applicant's award.

9.3 Legal Settlements

Funds received from any settlement or trust may be considered a DOB for the Program per HUD. Lawsuit settlements will be evaluated for DOB applicability as more information becomes available.

Legal fees that were paid by the applicant to successfully obtain insurance proceeds are considered exclusions to the applicant and are not included as part of their DOB. Applicants must provide evidence of payment and a judgment or settlement demonstrating the success in the legal action. All other legal fees that an applicant may have paid out of any disaster assistance proceeds are deducted as part of their DOB if the assistance funding used was intended for purchase of a home.

9.4 Other Sources of Duplication of Benefits

Following a disaster, charitable organizations provide many kinds of contributions, including donations, grants, or loans, among other types of assistance. Grants and cash donations designated for specific eligible work, even when provided from non-Federal sources, but designated for the same purpose as Federal disaster funds generally are considered a duplication of benefit.

9.5 DOB Review

The Program or an authorized representative will review each application to determine if funding awarded or donated to the applicant was received for the same purpose as the assistance made available to the applicant through the HBA. For this purpose, applicants must provide insurance

documentation, FEMA, SBA, and any other type of documentation demonstrating the receipt of funds. The Program will verify the accuracy of the submitted documentation before an award is offered to an applicant. Then, the Program or an authorized representative will determine the applicant's total unmet needs and calculate the applicant's total DOB, if any. The applicant must have an unmet need to move forward in the Program. The Program or an authorized representative must ensure compliance with the Stafford Act by collecting, analyzing, and verifying funds or assistance received by applicants for purposes of homeownership. Any sources of funding previously received by the applicant for the same purpose as the assistance made available by the HBA will be deducted from the total unmet needs. The calculation of DOB must be based on the collection of documentation provided by the applicant or obtained by the HBA via one of Pinellas Recovers information sharing agreements. For example, DOB will be calculated from information obtained from FEMA, SBA, and/or in-kind assistance used for the same purpose as the CDBG-DR award. The final award will be calculated by subtracting any DOB assistance from the total unmet need of the applicant. To comply with these requirements, the Program or its authorized representative will enter the applicant's information into the DOB database to determine whether the applicant received additional financial funds as well as to ensure that any funds determined to be DOB are deducted from the final assistance award.

Regarding charity or in-kind assistance, the Program requires full disclosure from the applicant during the application intake process and will review the lending documentation to ensure duplicative assistance is accounted for in unmet needs calculation. The applicant must repay any assistance later determined to be DOB, i.e., received for the same purpose as those awarded or provided with CDBG-DR funds. The applicant must certify they understand this requirement as outlined in detail in the subrogation terms included in the Subrogation Agreement.

9.6 Subrogation

Applicants must subrogate any additional funds received for the same purpose as funds provided by HBA back to the program. CDBG-DR funding must be funding of last resort. If additional funds are paid to applicant awardees for home purchasing assistance after HBA has closed, 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.*

10 Environmental Review

An environmental review process is required for all HUD-assisted projects to ensure that the proposed undertaking does not negatively impact the property or surrounding social, cultural, and physical environment and possible historic fabric. The specific purpose of the environmental

review process for the HBA is to ensure that with respect to the property being purchased there are no environmental hazards present, there is no adverse impact on the community social and cultural fabric, and that the property does not have potential historic value. Every project must be in compliance with the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws. For more information, refer to https://www.epa.gov/nepa. Environmental clearance and HUD certification of the Request for Release of Funds (RROF) must be obtained for each project prior to the commitment or expending of federal or non-federal funds. The HUD rules and regulations that govern the environmental review process can be found at 24 CFR Part 58. The provisions of the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations in 40 CFR Parts 1500 through 1508 also apply. Other federal and state laws and regulations (some of which are enforced by State agencies) also apply depending upon the type of project and the level of review required.

10.1 Level of Environmental Review

For the HBA, the level of Environmental Review is defined at 24 CFR § 58.34(a)(3) and 24 CFR § 58.35(b)(5). Activities to assist homebuyers with down payment, closing costs, or interest buy-downs that result in the transfer of title to existing or new dwelling units are Categorically Excluded Not Subject to § 58.5 (CENST) under § 58.34(a)(3).

The environmental review for these activities will still require a formal determination and documentation in the Program's Environmental Review Record (ERR) confirming that the activity qualifies as CEST and identifying compliance with the requirements at 24 CFR § 58.6 (floodplain, coastal barrier resources, and airport clear zone restrictions). The County will ensure its Environmental Review Record (ERR) template reflects this CENST classification for HBA activities.

Other requirements to include are:

- Location within a Special Flood Hazard Area;
- Location within a Coastal Barrier Resource System unit and;
- Purchase or sale of an existing property in a Runway Protection Zone or Clear Zone.

10.1.1 Special Flood Hazard Area

In accordance with the County's 2025 CDBG-DR Action Plan and these Guidelines, if the property is determined to be in a Special Flood Hazard Area, the property will not qualify for homebuyer assistance.

10.1.2 Coastal Barrier Resources Area

The Coastal Barrier Resources Act (CBRA), 16 U.S.C. §3501 et seq., protects coastal areas that serve as barriers against wind and tidal forces caused by coastal storms and serve as a habitat for aquatic species. In compliance with the Act, if the property is determined to be located within a Coastal Barrier Resources Area, the property will not qualify for homebuyer assistance.

10.1.3 Runway Protection Zone or Clear Zone

In a case where a property is determined to be in a runway protection zone or clear zone, Pinellas County, as the Responsible Entity, must inform the buyer of the implications of such location and that there is a possibility that the property may at a later date, be acquired by the airport operator.

The buyer must sign an acknowledgement statement understanding the implications of such purchase.

11 Lead Based Paint

In Compliance with 24 CFR Part 35, prior to closing on any home built before 1978, the following measures must be taken regarding Lead Based Paint:

- If the appraiser determines lead-based paint risk, then the buyer or seller will need to perform stabilization measures of deteriorated paint prior to occupancy (Stabilization Measures are outlined in 24 CFR 35.1330)
- Any stabilization or mitigation measures taken must be performed by a certified contractor and the work completed must comply with Lead-Safe Work Practices (24 CFR Part 1330)
- A qualified clearance examiner to examine the mitigation measures taken. Clearance will need to be provided by the qualified clearance examiner when paint stabilization is complete before proceeding with funding.
- Buyers to receive a copy of lead-based paint pamphlet disclosure for properties built in 1978 or prior.

12 Award

The Homebuyer Assistance Program award amount will be based on the purchase price or the appraised value, whichever is less, then subtract the first mortgage loan amount, then add the closing cost and prepaids. A copy of the appraisal is required to confirm the appraised value of the property. Additionally, the purchase and sale agreement must include an appraisal contingency, which allows the buyer to cancel the contract or renegotiate the purchase price if the property appraises for less than the agreed-upon sale price. The maximum amount of assistance is capped at $80,000 per eligible applicant. The applicant must contribute the excess funds from their own source or other sources acceptable to the first lender if funds required for closing is more than the combined amount of the first mortgage and the capped HBA amount. Any additional funds required for closing will be based on first lender underwriting guidelines.

As noted above, for any purchase to be approved, all Program requirements including maximum front-end ratio and first loan approval must be met.

12.1 Loan Approval & Settlement Procedures

Upon approval, a HBA Grant Agreement will be prepared for approval by the County and routed for execution by the buyer(s) and County. Additionally, the loan settlement statement/closing disclosure will be prepared by the title company and sent to the Program for review and approval to ensure the HBA Program second mortgage and note are properly executed and recorded in accordance with the Program guidelines. The following documents must be executed by the property purchaser:

- Promissory Note
- Second Mortgage
- Truth-In-Lending

- Subordination Policy
- Lender's Title Policy
- All other documentation deemed necessary

After execution, the mortgagee's Title Policy, copy of a signed Closing Disclosure, original recorded Mortgage and Note, and other closing documents related to the purchase must be sent to the Program.

12.2 Disbursement of Funds

All funds for the second mortgage loan will be processed by the Program and made available to the title company for escrow prior to closing.

In conjunction with receipt of the approval letter, the lender will be required to provide the Program with the following items:

- A firm closing date and the name of the title company. The Program will need a minimum of ten (10) working days' notice prior to closing in order to have the funds available.
- A copy of a joint mortgagee's title insurance commitment along with lender's title policy prior to closing (with policy to follow closing) listing "Pinellas County Government, A Political Subdivision of the State of Florida" as a second mortgagee.
- All homebuyers must complete a home inspection by a Florida Licensed State Inspector and provide a copy of the inspection report to the program prior to closing. A four (4) point home inspection will be accepted for all new construction (never lived in) properties. Condominiums three stories or greater (including a drive under style garage) **must** have a milestone inspection with no significant findings.
- Any approved funds that are not utilized at the closing will be required to be returned to the Program. A refund check should be made payable to Pinellas County Government, c/o Pinellas Recovers, ATTN: Erica Henry, Disaster Recovery Program Manager, Mail to: 400 S. Ft. Harrison Ave., Ste. 349, Clearwater, FL 33756, co Pinellas Recovers HBA.

13 Applicant Responsibilities

For HBA to be successful, the applicant must participate and comply with Program timeframes, directives, and requests. HBA 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.

13.1 Applicant Cooperation with the Program

Throughout the life of an applicant's participation in HBA 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**.

HBA 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.
- **Schedule:** The Program requires applicant cooperation and participation at multiple points throughout the process. Applicants must schedule and attend required appointments, or other required meetings in a timely manner. HBA will make reasonable attempts to coordinate schedules with homeowner availability. Applicants who refuse to schedule or attend required meetings or inspections may be sent a Pending Action Notice.

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.

13.2 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.

13.3 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) Homebuyer Assistance Program (HBA) are required to maintain professional and cooperative conduct when interacting with County staff, consultants, lenders, title companies, and subcontractors.

13.3.1 Participant Standards of Conduct

Program participants, including applicants, household members, and authorized designees, are expected to:

- Treat County staff, program representatives, consultants, lenders, and vendors 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 all program activities, including document submission, appointments, lender coordination, inspections (if applicable), and closing preparation.

- Refrain from obstructing or delaying authorized program processes or communications.
- Follow all policies, procedures, and agreements necessary to ensure compliance with federal, state, and local requirements.

13.3.2 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.

13.3.3 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.

14 Voluntary Withdrawal

An Applicant may request to withdraw from the Program at any time before closing. Applicants may indicate a desire to withdraw to any HBA 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 HBA 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.

15 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. Individuals who are aware of or suspect such activity are encouraged to report it to the Pinellas County Clerk of the Circuit Court and Comptroller Inspector General (Internal Audit Office), directly to the HUD Office of Inspector General (OIG), or to 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.

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.

15.1 Fraud Awareness, Prevention, and Beneficiary Assistance

Pinellas County will provide HBA Applicants and beneficiaries with information designed to raise awareness of potential fraud risks associated with disaster recovery activities, including identity theft, misrepresentation, predatory lending, and real estate transaction fraud. Pinellas County shall provide clear and accessible information to applicants regarding potential fraud risks associated with homebuying. The Program will provide clear and accessible information to applicants regarding potential fraud risks associated with homebuying, which include:

- Informing Applicants that program assistance is free to apply
- Educating Applicants on common risks, including:
    - Identity theft
    - Mortgage fraud and predatory lending
    - Wire transfer scams during closing
- Providing written materials outlining safe homebuying practices
- Encouraging Applicants to work with licensed real estate agents and lending professionals

15.2 Reporting Fraud

Any allegations of fraud, waste, abuse, or mismanagement related to CDBG-DR funds or resources must be reported to the CDBG-DR Pinellas County Clerk of the Circuit Court and Comptroller Inspector General (Internal Audit Office), directly to the HUD Office of Inspector General (OIG at HUD), or to any local or federal appropriate 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 the Circuit Court and Comptroller Inspector General Hotline

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 6: Reporting Fraud, Waste and Abuse

Allegations of fraud, waste or abuse can also be reported directly to **HUD 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 7: HUD OIG

16 Complaints

Applicants may submit a complaint to the Program any time. In accordance with guidance outlined in 87 FR 6364, HBA 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**, HBA 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 HBA 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

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 8: Intake Center

17 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 to contest:

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

Persons who wish to request an initial appeal related to HBA 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 HBA Appeals Coordinator will conduct an initial review of the supporting documentation and prepare a draft determination. Prior to issuing the determination to the applicant, the draft determination will be provided to Pinellas County (Pinellas Recovers) for review and concurrence. Once concurrence is received, the Program will issue the Initial Appeal Determination Notification to the applicant. When practicable, determinations will be issued 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 modified through the appeals process.

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 may decline to consider new documentation that is not relevant to the issue under appeal.

18 Exceptions to Program Policies

The HBA Guidelines set forth the policy governing the program and approved HBA 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.

18.1 Exceptions to Program Policies and Maximum Assistance

Pinellas County may grant exceptions to certain HBA 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.

19 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

Administration Manual. This Manual covers topics such as financial management, 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 HBA.

20 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.

20.1 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.

20.2 Use of Program Income

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

20.3 Tracking and Reporting

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

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

20.4 Closeout Considerations

PI 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 PI is managed in compliance with applicable federal requirements.

21 Closeout

Applications will be closed upon closing of the purchased property to the homeowner.

HBA 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 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.

When all quality control review levels have been approved, the applicant will be sent a Final Notice from the program, informing the applicant that his/her case has been closed and reminding the applicant of compliance period requirements.

[END PROGRAM GUIDELINES]

Appendix A – Definitions

Affordability / Compliance Period: The length of time during which a property assisted under a CDBG-DR housing program must remain in compliance with program requirements, such as owner occupancy or rental affordability. The compliance period is secured through a recorded lien, restrictive covenant, mortgage, or other enforceable instrument and is monitored by Pinellas County for the duration of the required term, consistent with 24 CFR. § 570.503(b)(7).

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 Homebuyer Assistance Program

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

Concrete Masonry Unit (CMU): a standardized, precast rectangular block used for traditional wall construction.

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), as defined in HUD's CDBG-DR Universal Notice, Appendix C.

Eligible Property: A residential property located within Pinellas County (excluding the City of St. Petersburg) that meets all HBA Program eligibility, environmental, and affordability requirements. Eligible properties include existing or newly constructed single-family homes, townhomes, or warrantable condominiums intended for use as the buyer's primary residence. All properties must comply with applicable local housing, zoning, and environmental standards and must pass the Program's required environmental review prior to purchase.

Properties located within a Special Flood Hazard Area (SFHA) or a Coastal Barrier Resource System (CBRS) unit are not eligible for assistance. Properties must be free of environmental hazards and must meet decent, safe, and sanitary housing standards in accordance with 24 CFR § 570.202 and HUD's April 2025 Universal Notice.

Environmental Review: All qualified projects must undergo an environmental review process. This process ensures that the activities comply with the National Environmental Policy Act (NEPA) and other applicable state and federal laws. For HUD purposes, applicable requirements are found at 24 CFR 58.

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.

First Mortgage: A First Mortgage refers to the primary lien recorded against a property to secure repayment of a home loan. It has priority over all other liens and must be satisfied before any subordinate liens in the event of sale, foreclosure, or transfer. In the context of the HBA Program, the First Mortgage is the homebuyer's primary financing instrument provided by a private lender or financial institution for the purchase of the property.

Floodplain: FEMA designates floodplains as geographic zones subject to varying levels of flood risk. Each zone reflects the severity or type of potential flooding in the area.

Floodway: A "Regulatory Floodway" means the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. Communities must regulate development in these floodways to ensure that there are no increases in upstream flood elevations. For streams and other watercourses where FEMA has provided Base Flood Elevations (BFEs), but no floodway has been designated, the community must review floodplain development on a case-by-case basis to ensure that increases in water surface elevations do not occur or identify the need to adopt a floodway if adequate information is available.

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.

Housing and Community Development Act (HCDA): Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.), the federal statute that authorizes the Community Development Block Grant (CDBG) program and establishes its eligible activities, national objectives, and grantee requirements.

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.

Mobile/Manufactured Housing Unit (MHU): A structure, transportable in one or more sections which, in the traveling mode is 8 body-feet or more in width, or 40 body-feet or more in length, or when erected on site, is at least 320 square feet, is built on a permanent chassis and is designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning and electrical systems contained therein. Sometimes referred to as mobile homes.

Multifamily: Residential structures containing five or more units or multifamily residential structures located on adjacent lots. Multifamily structures are not eligible under these Guidelines.

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 CFR § 200.307(e) and HUD's April 2025 CDBG-DR Universal Notice, Section III.A.6.f.

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.

Second Mortgage: A Second Mortgage refers to a subordinate lien recorded against the same property after the First Mortgage. Under the HBA Program, the Second Mortgage represents the forgivable loan or deferred payment loan provided by Pinellas County using CDBG-DR funds to assist with down payment, closing costs, or other eligible expenses. This mortgage serves as a compliance mechanism to ensure the homebuyer meets all program requirements, such as maintaining the property as their primary residence for the required five-year affordability period, after which the County may release the lien through a Satisfaction of Mortgage once compliance is verified.

Single Family Residence: Residential structures containing one (1) to four (4) dwelling units.

Stick-built home: A home that has been built on-site using traditional construction materials and methods or a modular home.

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.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601 et seq.; 49 CFR Part 24): The URA establishes minimum, nationwide standards for the acquisition of real property and the relocation of persons (individuals, families, businesses, farms, and nonprofits) displaced as a direct result of federally funded projects