Pinellas County

Pinellas Recovers

Hurricane Help That Puts People First

People First Hurricane Recovery Programs

Homeowner Reimbursement Program (RMB)

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	Expanded eligibility to muti-family structures (4.4), established minimum award amount for all applicants and a maximum award amount for MHU applicants (9.1). Clarified language on Program Income (17), Exception Requests (15), Environmental Reviews (8). Added Timely Expenditures and Performance Monitoring (2.6), Subrogation (6.2), Integration of Mitigation and Resilience Measures (2.7), and Fraud Awareness, Prevention, and Beneficiary Assistance (12.1) sections.	Pinellas County

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Version Policy

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

Policy Change Control

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

1 Introduction

This document serves as the program guidelines for reimbursement under Pinellas County's People First Hurricane Recovery Program known as the Homeowner Reimbursement Program (RMB). These guidelines were developed to serve as a basis for the Homeowner Reimbursement program and to provide guidance on program implementation that follows HUD standards and best practices. This document may also serve as a reference for property owners, applicants, and other interested parties who want to understand how the program operates. Note that this program guideline is only intended to address the Homeowner Reimbursement Program (RMB). 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 US Department of Housing and Urban Development (HUD) to address remaining unmet disaster recovery needs in areas impacted by Hurricanes Helene, Idalia, and Milton in 2023 and 2024. Federal Register notice (90 FR 4759) allocated a total of $813,783,000 to support long-term recovery to Pinellas County. The CDBG-DR funds allotted to Pinellas County have been allocated to housing, infrastructure, planning, economic revitalization, and public services. These funds will be administered through Pinellas County's County Administration office. Pinellas County has allocated $20,787,758 in CDBG-DR funding for the Homeowner Reimbursement Program (RMB) which will serve owner-occupied properties.

The unmet needs assessment included in the Action Plan demonstrated significant unmet need related to single family home repair, reconstruction, or replacement, for owner-occupied properties throughout the county impacted by Hurricanes Idalia, Helene and Milton in 2023 and 2024.

2 Program Overview

The Homeowner Reimbursement Program (RMB) provides housing assistance to eligible single-family owner/occupant applicants (Owner-Applicants) affected by Hurricanes Idalia, Helene, and/or Milton in 2023 and 2024. RMB assists property owners by providing reimbursement for applicant funds used to repair, reconstruct, or replace single family homes that suffered hurricane damage.

RMB is centrally administered by Pinellas County's County Administration Office and serves low- to moderate-income (LMI) households impacted by Hurricanes Idalia, Helene, and Milton. RMB is a CDBG-eligible activity that will be undertaken in accordance with 24 CFR 570.202 and other applicable regulations.

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

RMB funds will be distributed to homeowners directly. Eligible property types may include:

- Stick-built homes,
- Concrete block/Concrete masonry units (CMU) homes,
- Mobile or Manufactured homes (MHUs),
- Other single-family and multifamily unit residence types, including townhomes, duplex, triplex, quadplex, and condominiums.

2.1 Purpose and Objective of RMB

The purpose of the Homeowner Reimbursement Program (RMB) is to assist the most vulnerable and impacted households in Pinellas County and address the housing needs identified in the unmet needs assessment. RMB's primary objective is to provide reimbursement funds to eligible applicants.

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

2.2 National Objective

Activities funded through RMB will primarily meet the HUD National Objective of providing benefit to Low- and Moderate Income (LMI) persons and Urgent Need (UN). To ensure that the program is in compliance with HUD's National Objective to benefit low-and moderate-income persons and Urgent Need, owner/occupant applicant households served by RMB must qualify with a total household annual gross income that does not exceed 120% of Area Median Income (AMI), adjusted for family size, as published annually by HUD.

2.3 Eligible Location

To be eligible, an owner-occupied, storm-impacted property must be located in Pinellas County, Florida (except City of St. Petersburg). Owner-occupied properties located in the City of St. Petersburg are not eligible, as the City is administering its own CDBG-DR funded housing programs.

2.4 Award Caps

The maximum reimbursement award granted for home repairs for a traditional built home is $50,000 and the maximum reimbursement award granted for home repairs for a MHU is $15,000. The minimum calculated reimbursement award granted for home repairs is $5,000.

2.5 Social Media

The County Administration Office will also use official social media channels to provide timely, accessible updates regarding key program milestones, including the opening of this Program's applications and the scheduling of public hearings related to the program.

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

- Notify residents when applications for the program are open;
- Announce dates, times, and locations (physical or virtual) of public hearings on proposed plans, amendments, or CDBG-DR-funded projects;
- Share links to online applications, 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:
    - **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

2.6 Timely Expenditures and Performance Monitoring

In accordance with HUD's Community Development Block Grant – Disaster Recovery (CDBG-DR) Universal Notice, Pinellas County has developed projected expenditures and outcomes for the Homeowner Reimbursement Program (RMB). These projections are based on anticipated quarterly performance, beginning with the quarter in which funds are made available to the County and continuing through full expenditure of allocated funds.

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

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

2.7 Mitigation and Resilience

Because the Homeowner Reimbursement Program (RMB) provides reimbursement for eligible, completed disaster-related repairs, mitigation measures are eligible for reimbursement when they were required by applicable building codes, necessary to address disaster-related damage, or implemented to reduce future hazard risk to the assisted property.

Mitigation activities reimbursed under RMB may include measures incorporated into completed repair, reconstruction, or replacement work that enhance the property's resilience to future

disasters. All reimbursed mitigation activities will be documented in the applicant file and, where applicable, tracked in HUD's Disaster Recovery Grant Reporting (DRGR) system consistent with HUD guidance.

2.8 Minimizing Displacement and Relocation Assistance

The Homeowner Reimbursement Program (RMB) is designed to minimize displacement to the greatest extent feasible. RMB provides reimbursement for eligible, completed disaster-related repairs to owner-occupied properties and does not involve acquisition, demolition, or rehabilitation activities funded by the Program. As a result, most RMB activities are not expected to result in temporary or permanent displacement.

In such cases, minimizing displacement is not applicable because displacement does not occur. If, however, displacement were to result from an eligible RMB activity, Pinellas County would provide relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and its implementing regulations at 49 CFR part 24, and applicable HUD regulations.

Pinellas County maintains a Residential Anti-Displacement and Relocation Assistance Plan (RARAP) applicable to CDBG-DR-funded activities. The RARAP would be implemented, and accessibility needs of displaced persons with disabilities addressed, prior to undertaking any activity that could result in displacement.

2.9 Rapid Unsheltered Survivor Housing (RUSH) Alignment

The Reimbursement Program (RMB) supports Pinellas County's broader housing recovery framework by maintaining coordination with HUD's Rapid Unsheltered Survivor Housing (RUSH) initiative, as applicable. RUSH provides flexibility to accelerate housing solutions for disaster-impacted individuals and households experiencing or at risk of unsheltered homelessness following a federally declared disaster.

While RMB's primary purpose is to reimburse eligible homeowners for eligible, completed repairs, the Program maintains limited coordination with RUSH through:

- **Referrals and outreach** – sharing information about RMB opportunities with disaster-impacted households who may have stabilized through RUSH or related County programs; and
- **Cross-program communication** – ensuring consistent messaging across the County's People's First housing recovery portfolio and connecting homeowners to appropriate assistance resources when needs fall outside the scope of RMB.

RMB does not administer temporary housing, relocation, or direct RUSH activities. Instead, this coordination ensures that homeowners who have achieved initial stabilization under RUSH or similar efforts are informed of potential reimbursement opportunities that may support their long-term recovery.

3 Intake Application

Single-family property owner-occupants who are interested in reimbursement assistance may apply for the Homeowner Reimbursement Program (RMB) via the following methods.

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

Office Location	Operating Hours
2600 McCormick Drive **Suite 100** **Clearwater, FL 33759**	Monday through Friday, 8 a.m. to 5 p.m.
5000 Park Street **Suite 4** **St. Petersburg, FL 33709**	Monday through Friday, 8 a.m. to 5 p.m.

Table 1: Intake Center Operating Hours

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

Applicants will be required to complete an RMB intake application and provide supporting documents required for eligibility review, income verification, and duplication of benefits review. All documentation submitted by the applicant must be valid at the time of submission. The application process will require each applicant to authorize RMB to obtain 3rd-party data by signing a consent/release form. Case Managers will collect documents needed to determine eligibility and which program benefits the applicant may be eligible to receive[2].

Case Managers will be available at the People First Hurricane Recovery Program intake centers, by phone, and via email to assist the applicant through the intake process and to answer questions as needed. Each applicant will be assigned a dedicated Case Manager. Each Case Manager has a direct email and phone line at which he/she can be reached. Applicants are provided direct contact information for the Case Manager assigned to the application. Alternatively, the applicant may contact a program representative by using the general contact information outlined below.

Multiple standard methods of communication will be provided to ensure applicants receive timely, accurate information regarding their applications and the program. Applicants may check the

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

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

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: peoplefirst@pinellas-recovers.com
- 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 RMB. Pinellas County may adjust the intake period at its discretion to accommodate program needs and will post deadlines online.

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

3.1 Applicant Identification and Citizenship/Immigration Status

3.1.1 Identification

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

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

Household members under the age of eighteen (18) must also submit proof of age and identity. 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 owner-applicants, co-applicants and co-owners must meet the eligibility and verification requirements under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as amended (8 U.S.C. §§ 1601–1646), and as required by the Universal Notice. Assistance is limited to U.S. citizens and qualified aliens as defined in 8 U.S.C. § 1641.

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

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 RMB. 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. RMB 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 co-owner of the storm-impacted property. For Owner-Applicants, a Co-Applicant must also be a household member of the storm-impacted property. Co-Applicants will have the same authority over the RMB 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 RMB 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 RMB application. RMB shall be authorized to share information with the communication designee, but the Communication Designee is not authorized to make any decisions regarding the RMB application or affect the RMB application on the applicant's behalf.

Any of the aforementioned persons, if duly appointed by the applicant, may serve as the applicant's representative in attendance of program inspections, should the applicant be unable or unwilling to attend. However, only 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 RMB 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 RMB and for purposes of progressing his/her case through RMB
Right of Entry	Authorization from the applicant for the program to access the storm-impacted property throughout the life of the application
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 RMB after provision of assistance through RMB must be returned to Pinellas County
Conflict of Interest Disclosure	Applicant's report of relationship with any public servant, employee, agent, consultant, officer, or elected official or appointed official of Pinellas County, or of any designated public agencies, or of subrecipients that are receiving funds under the CDBG-DR Program (collectively, "Public Servant") and the nature of said relationship. Applicants who do not have

	a relationship with Public Servants must report that no such relationship exists.

Table 2: Applicant Certifications Collected at Intake

3.3 Order of Assistance (Prioritization)

Applicants to the Homeowner Reimbursement Program will be processed on a first-come, first-processed basis.

4 Eligibility Requirements

The Homeowner Reimbursement Program (RMB) will assist owner-occupied units impacted by Hurricanes Idalia, Helene, and/or Milton. Single-family owner-occupants who owned their properties during the time of the hurricane(s) may be eligible for assistance. Each applicant will be screened for eligibility to ensure compliance with RMB 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 RMB, then they may be required to make full restitution to Pinellas County, including administrative fees, construction costs, and other costs.

Below are the threshold eligibility requirements for owner-occupant applicants (Owner-Applicants) to be eligible for assistance. Threshold requirements are those that will either allow an applicant to continue to move forward in the program or result in disqualification. Please note that being deemed eligible does not guarantee that assistance will be provided, as RMB is subject to limited funding.

All applicants to RMB must demonstrate compliance with all eligibility criteria. Individual **Owner-Applicants** applying to RMB for assistance must meet all of the following criteria:

- Applicant must have owned the storm-impacted property at the time of Hurricane Idalia, Helene, and/or Milton and must still own the property;
- The applicant must have occupied the home as a primary residence at the time of Hurricane Idalia, Helene, and/or Milton;
- The storm-impacted property must be located within Pinellas County, Florida (except the City of St. Petersburg);
- Entire property must not be located in a regulatory floodway;
- The applicant must have documented expenditures for eligible rehabilitation, demolition, or reconstruction costs directly resulting from damage caused by one or more of the qualifying disasters (Idalia, Helene, or Milton), as verified through documentation and/or cost estimating tools;

- For single-family owner-occupied units located within multifamily structures, eligible reimbursement is limited to disaster-related repair costs that directly benefit the applicant's individual residential unit. Costs associated with shared building systems, common elements, exterior repairs, or construction that benefit the overall structure, or other units are not eligible for reimbursement.
- All disaster-related repairs must be fully completed prior to the submission of an application for reimbursement;
- The storm-impacted property must be an eligible structure type.
- The storm-impacted property must have a minimum calculated award equal to or greater than $5,000.

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

The following table includes eligibility criteria for Owner-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 have owned the storm-impacted property at the time of Hurricane Idalia, Helene and/or Milton. Applicant must still own the property to receive assistance.	One (1) of the following: • Deed • Mortgage statement • Title (for mobile homes only) • Probated will • Court order or judgement granting ownership of the property • Other documents may be considered on a case-by case basis
Must have occupied the home as a primary residence at the time of Hurricane Idalia, Helene and/or Milton	• Homestead exemption at the storm-impacted property address in 2023, which was the year of Hurricane Idalia OR Homestead exemption at the storm-impacted property in 2024, which was the year of Hurricanes Helene and Milton. OR 2 of the following: • FEMA IA award letter for storm-impacted property address for damages caused by Hurricane Idalia, Helene, and/or Milton; • SBA Disaster Home Loan award letter for storm-impacted property address for damages caused by Hurricane Idalia, Helene, and/or Milton; • Driver's license or state-issued ID card showing the storm-impacted property address; issued or

Eligibility Criterion	Document(s) Required
	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; • Insurance documentation indicating primary residence in 2023 (Idalia) or 2024 (Helene and Milton), such as a homeowner's endorsement; • 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
Property is located in Pinellas County (except City of St. Petersburg)	Verified by the program using storm-impacted property address and GIS mapping, if needed
The storm-impacted property must be an eligible structure type	Verified by the program via a Damage Assessment; OR If it is impossible to verify structure type via a program damage assessment, such as in cases where the storm-impacted property has been demolished, the applicant may be required to provide proof of storm damage, which may include: • Pre-storm information on structure type from the property appraiser's office; • Date-stamped, color photos of the storm-impacted property address; or • Other document considered on a case-by-case basis
Property must not be located in a regulatory floodway	• Verified by the program using FEMA Flood Insurance Rate Maps (FIRM)
All disaster-related repairs must be fully completed prior to the submission of	• Closed permits • Certificate of Completion from AHJ • Damage Assessment

Eligibility Criterion	Document(s) Required
an application for reimbursement.	

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

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

4.1 Ownership

To qualify for RMB, applicants must own the storm-impacted property. Applicants must be able to demonstrate that they owned the property at the time of Hurricane Idalia, Helene, and/or Milton.

4.1.1 MHU Ownership

Applicants applying for assistance for a mobile home unit (MHU) must establish ownership of the MHU at the time of Hurricane Idalia, Helene, and/or Milton.

4.1.1.1 Documents Required

Proof of MHU ownership can be established with the following documents:

- Property Title;
- Bill of Sale showing applicant name as owner;
- Title from the county land records showing manufactured home ownership; or
- State issued Certificate showing the name of the applicant as owner.

If the applicant was under a Lease Purchase Agreement for the property and/or MHU, the contract must be satisfied and a warranty deed granting the property to the applicant must be recorded in the property records. The original contract and subsequent Warranty deed are required. RMB may consider other forms of MHU ownership on a case-by-case basis.

4.1.2 Stick-Built/CMU Properties Ownership

Applicants applying for assistance for a stick-built/CMU home must establish ownership of the property as of August 2023 for Hurricane Idalia, September 2024 for Hurricane Helene, or October 2024 for Hurricane Milton.

4.1.2.1 Documents Required

Proof of ownership can be established with the following documents:

- Deed;
- Mortgage statement;
- Probated will;
- Court order or judgment granting ownership of the property; or
- Other documents may be considered on a case-by-case basis

4.1.2.2 Alternative Documentation of Ownership

In cases where traditional documentation such as deeds or titles are unavailable, the Program will accept alternative forms of proof of ownership to prevent exclusion of otherwise eligible applicants. Acceptable documents may include, but are not limited to:

- Tax receipts or bills;
- Mortgage documentation;
- Home insurance policies;
- Home purchase contracts;
- Wills or affidavits of heirship;
- Receipts of major repairs completed prior to the disaster;
- Court documents;
- Letters from manufactured housing community owners or public officials;
- Self-certifications; or
- Utility bills.

Each case will be reviewed individually, and documentation will be evaluated for credibility and consistency with occupancy and ownership requirements.

4.1.2.2.1 Trust

If any percentage of the storm-impacted property was transferred to the applicant through a family trust by the prior owner of the property, a copy of the Trust document that has been recorded in the property records will satisfy the ownership requirement.

The following types of ownership are ineligible for assistance under this program:

- Applicants who lost ownership of their home due to foreclosure or properties with an outstanding suit;
- Properties located where federal assistance is not permitted. Properties must be in compliance with Environmental Code 24 CFR Part 58.

4.1.3 Title Clearance Activities

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

4.2 Primary Residence

RMB Owner-Applicants must provide documentation that establishes that they occupied the storm-impacted property as their primary residence 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.

4.2.1 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:

- Homestead exemption at the storm-impacted property address in 2023, which was the year of Hurricane Idalia, or Homestead exemption at the storm-impacted property address in 2024, which was the year of Hurricanes Helene and Milton;

Or two (2) of the following documents:

- FEMA IA award letter for storm-impacted property address for damages caused by Hurricane Idalia, Helene and/or Milton;
- SBA Disaster Home Loan award letter for storm-impacted property address for damages caused by Hurricane Idalia, Helene and/or Milton;
- Driver's license or state-issued ID card showing the storm-impacted property address; issued 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;
- Insurance documentation indicating primary residence in the year 2023 or 2024, such as a homeowner's endorsement;
- Employer's statements, including pay stubs and similar employment documents dated in the month preceding or month of the disaster;
- 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.

4.3 Property Must be Located in Pinellas County, Florida

To be eligible, a property must be located in Pinellas County, Florida (except City of St. Petersburg). The program will verify the property location using the property address and GIS coordinates/mapping if needed. Owner-occupied properties located in the City of St. Petersburg are not eligible, as the City is administering its own CDBG-DR funded housing programs.

4.4 Eligible Structure

To be eligible for RMB assistance, the property must be an eligible structure type. Eligible structure types are limited to single-family dwellings for which disaster-related repairs/reconstruction were completed prior to application and can be verified under these Guidelines.". Eligible owner-occupied structure types include:

- Single-family stick-built/Concrete block homes;
- Modular or Manufactured Homes
- Townhomes, Condominiums, Duplexes, Triplexes, Quadplexes or single-family units within multifamily structures (5 or more units per structure)

4.5 Ineligible Structures

The following structure types are ineligible for RMB assistance:

- Garages, sheds, and outbuildings not attached to the main dwelling unit are not eligible for repair but may be eligible for demolition only, as part of an eligible project, if deemed a safety hazard or in the path of the proposed construction activities. Garages, sheds, and outbuildings will not be addressed as stand-alone activities. Improvements must be permanently attached to the main housing structure;
- Recreational Vehicles and camper trailers used as a residence are not eligible for the program;
- Houseboats used as a residence are not eligible for the program;
- Second homes;
- Seasonal, short-term, and vacation rental properties;
- Housing units located where federal assistance is not permitted by federal regulation, including floodways, or within a Coastal Barrier Resources System unit;
- Properties with delinquent mortgages, delinquent real property taxes, or properties that are subject to bankruptcy proceedings or in foreclosure;
- Properties located on sites with extraordinary site conditions that are determined to be not feasible for demolition and reconstruction or replacement. Extraordinary site conditions may include but are not limited to properties with environmental concerns, properties where local building codes prohibits program scopes of work, or properties located in a floodway;
- Properties currently under construction and/or contract by private contractor, HOA/POA, apartment complexes;
- Properties that do not meet Minimum Property Standards;
- Units within Multifamily properties that exceed 50% of the value of the unit prior to the disaster.
- Units within Multifamily properties that included re-configuration of walls, floors or ceilings.

4.6 Income Verification

In order to meet the income requirements for RMB, Owner-Applicants must be LMI or middle-income with a total household annual gross income that does not exceed 120% AMI, adjusted for family size, as published annually by HUD. 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 Owner-Applicants' eligibility for the Homeowner Reimbursement 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 or tax return transcript, if available, for the AGI of the household to be calculated. 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:

- **Wages**: Three (3) recent paystubs within the past three (3) months, W-2 Forms;
- **Retirement or Social Security**:
    - Past three (3) Monthly Bank Statements (Social Security Benefits & Pension only),
        - Bank statements are acceptable only if they clearly show gross recurring deposits; if net, require cross-verification with award letter or SSA-1099 to add back deductions.
    - Current Social Security Benefits letter (including benefits paid to minors),
    - Current Pension/Retirement Benefit letter (if applicable), or prior year 1099 form, or
    - Current Annuity Payment letter (if applicable), or prior year 1099 form;
- **Self-Employment Income**:
    - Most recent tax return (1040 or 1040A), W-2 Forms; and/or Current year profit and loss statement;
    - And Two (2) monthly bank statements
- **Rental Income:**

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

4.6.1.1 Household Size

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

4.6.1.2 Income Calculation Methodology

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

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

- **Minors** - Earned income of minors, including foster children (household member under age 18) is not counted. Unearned income attributable to a minor is included in the household income calculation (Examples include payments from trusts, stocks, bonds, etc. if the payments are taxable at the Federal level).
- **Temporarily Absent Family Members -** The income of temporarily absent family members is counted in the annual income, regardless of the amount the absent member contributes to the household. Temporarily absent family members are also counted as a member of the household when determining the household size.
- **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.

5 Conflict of Interest

A conflict of interest is a situation in which any person who is a public servant, employee, agent, consultant, officer, or elected official or appointed official of Pinellas County, or of any designated public agencies, or of subrecipients that are receiving funds under the CDBG-DR Program (collectively, "Public Servant") may obtain a financial or personal interest or benefit that is or could be reasonably incompatible with the public interest, either for themselves or a member of their family during their tenure.

For purposes of this section, "family" is defined to include parents (including mother-in-law and father- in-law), grandparents, siblings (including sister-in-law and brother-in-law), and children of an official covered under the CDBG conflict of interest regulations at 2 CFR § 200.112 CFR 200.318(c), and 24 CFR §570.611..

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

The above conflict of interest statement does not necessarily preclude Pinellas County or RMB 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 RMB 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 RMB to determine if said relationship constitutes a conflict of interest as outlined in HUD conflict of interest regulations, at 24 CFR §570.611 and 24 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 RMB.

6 Duplication of Benefits

Eligible applicants may have previously received assistance from other sources for the repair of their storm-impacted property. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. § 5155 (Section 312), prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which he/she has received financial assistance under any other program, from private insurance, charitable assistance, or any other source. No CDBG-DR funds in RMB will be used for activities where funds are available or reimbursable by the Federal Emergency Management Agency (FEMA) or the United States Army Corps of Engineers (USACE).

During the application process, the applicant must report any and all assistance received from other sources for the repair, replacement, or reconstruction of their storm-impacted property.

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 Homeowner Reimbursement Program do not duplicate benefits previously provided for the same purpose. If duplication is identified, the RMB award will be adjusted or reduced in accordance with Section 312 of the Stafford Act and HUD's April 2025 Universal Notice, Appendix.

Previous funds received and reported by the applicant are verified by RMB during the duplication of benefits (DOB) review process. Not all previous assistance received constitutes a duplication of benefits.

The RMB program will follow *Pinellas County's CDBG-DR Duplication of Benefits Procedure* that is in accordance with the HUD's April 2025 Universal Notice, Appendix C, the Program will apply HUD's duplication of benefits framework to all applicants. The framework requires that the Program: (1) assess the applicant's total need; (2) identify all assistance received or reasonably anticipated; (3) exclude non-duplicative amounts; (4) exclude funds provided for different purposes; (5) exclude funds for the same purpose but different allowable uses; (6) identify the final DOB amount (if any) and calculate the CDBG-DR award; and (7) reassess unmet need if additional assistance becomes available. Applicants must sign a subrogation agreement requiring repayment of duplicative assistance received after award. This procedure provides that before the award of assistance, Pinellas County will use the best, most recent available data from FEMA, the Small Business Administration (SBA), insurers, and any other sources of local, state, and Federal sources of funding to prevent a DOB.

6.1.1 Duplication of Benefits Gap

A DOB Gap is the total amount of excludable and non-excludable benefits received less the dollar amount of excluded benefits (excludable benefits). If the amount of previous assistance received minus excludable benefits is greater than $0.00, that creates a DOB Gap. If the DOB analysis reveals that a DOB Gap exists, the DOB gap must be satisfied (reduced to zero) prior to the execution of a Homeowner Grant Agreement.

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

- If the applicant qualifies for a reimbursement award, the award will be reduced in an amount equal to the DOB gap. No further action is needed from a reimbursement-eligible applicant to resolve a DOB gap.

Applicants will be notified in writing if a DOB Gap is discovered. Applicants will have **thirty (30) days** from the date of notification of DOB Gap to appeal the DOB gap determination.

6.2 Subrogation

Applicants must subrogate any additional funds received for the same purpose as funds provided by RMB back to the program. CDBG-DR funding must be funding of last resort. If additional funds are paid to applicant awardees for repair, reconstruction, and/or elevation of the damaged structure after RMB has provided reimbursement those funds constitute a duplication of benefit and therefore must be returned to Pinellas County. Applicant awardees will be required to sign a Subrogation Agreement as part of their grant agreement with the program. Every subrogation agreement will include this statement:

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

7 Damage Assessment

As stated in Federal Register Notice (90 FR 4759), CDBG-DR funds are intended to address unmet housing needs and other needs resulting from Hurricanes Idalia, Milton, and/or Helene. Non-hurricane damage may only be addressed on structures that also have hurricane-related damage.

A damage assessment will be conducted at each property to confirm the property is an eligible structure type and to confirm all disaster-related repairs completed to meet code compliance. Information collected during the damage assessment is used for the following key program determinations:

- **Eligibility** – To be eligible for assistance, all disaster-related repairs must be fully completed prior to the submission of an application for reimbursement and the structure must be an eligible structure type. The damage assessment confirms both of these items. If it is discovered during damage assessment that the home has unrepaired storm damage or that the property is an ineligible structure type, the applicant will be deemed not eligible. Additionally, the property must meet Minimum Property Standards ensuring the home is safe, sound, and secure.
- **Award Amount –** During the assessment, the inspector creates a damage repair valuation (DRV), which quantifies repairs made by the homeowner. Repairs are valued at standard builders grade materials. The dollar value of the DRV for reimbursement-only applicants will be used to determine the amount of CDBG-DR funding the applicant may be eligible to receive via a reimbursement award.

Program staff will conduct site visits to complete the damage assessment. The homeowner or the homeowner's designee should be present for these site visits. The inspector will inspect the

interior and exterior of the home to observe and record damage. The inspector will complete an environmental questionnaire at the time of the damage assessment and will note any environmental concerns on the site or nearby that could affect the evaluation.

8 Environmental Review

All RMB activities are subject to the environmental review requirements of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 et seq., as implemented by HUD at 24 CFR Part 58. RMB provides reimbursement for eligible disaster-related expenses and does not fund new ground disturbance, construction, rehabilitation, or acquisition; additionally for single-family units within multifamily structures only, there will be no demolition or reconstruction. Program activities are Categorically Excluded Subject to § 58.5).

The County will document this determination in the Environmental Review Record (ERR) utilizing a tiered environmental review approach and demonstrate compliance with all of the laws and authorities under 24 CFR § 58.5 . No funds will be committed prior to completion of the Part 58 determination (see 24 CFR § 58.22). Records will be retained per 2 CFR § 200.334.

8.1 Tiered Environmental Review

A tiered approach to environmental compliance was implemented for RMB. A tiered approach is appropriate when a specific type of activity that will take place in several locations, will serve the same function, and will have the same level of environmental impact regardless of the location where it is to be implemented. The tiered approach has two (2) parts: the broad environmental review that focuses on a targeted geographic area (the Tier I), and the site-specific review (the Tier II).

Tier I reviews were conducted prior to launch of RMB and addressed and analyzed environmental impacts related to reimbursement activities of single-family homes throughout Pinellas County. A Tier II review will be conducted for each RMB applicant, but prior to award signing. The Tier II review will identify those environmental impacts that will vary by site and may only be observed when specific project locations are known, such as but not limited to historic preservation, hazardous materials, noise abatement, asbestos removal, etc.

9 Award

Applicants who are deemed eligible and environmentally cleared will be notified that they are eligible to receive an award in writing, via an award letter. The award letter outlines the award amount the applicant is eligible to receive and next steps the applicant must take to accept the award. After the award letter is sent, the RMB Case Manager will schedule a Homeowner Grant Agreement (HGA) signing event with each eligible applicant.

During the HGA signing event, the case manager will review the information outlined in the Homeowner Grant Agreement.

The applicant must sign the HGA or appeal the award determination within **thirty (30) days** of the award letter being sent or the case will be closed[3].

9.1 Award Caps

The maximum award granted for reimbursement of any one traditional-built structure is up to $50,000 and $15,000 for an MHU.

To be eligible for a reimbursement award, applicants must have incurred the costs before submitting their reimbursement application and no later than January 16, 2027, which is two years after the applicability date of the County's initial Allocation Announcement Notice (AAN).

All completed work must have been properly permitted and code compliant. Reimbursement awards cannot be combined with awards to repair or reconstruct the storm-impacted structure. Proof of permitting and code compliance are required to be eligible for an award.

10 Applicant Responsibilities

For RMB to be successful in providing applicants with reimbursement awards, the applicant must participate and comply with program timeframes, directives, and requests. RMB 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 prior to construction start.

10.1 Flood Insurance

Section 582 of the National Flood Insurance Reform Act of 1994, as amended, supra, on prohibited flood disaster assistance, prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for repair, replacement, or restoration for damage to any personal, residential, or commercial property if that person at any time has received flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and subsequently having failed to obtain and maintain flood insurance as required under applicable Federal law on such property. This means that Pinellas County may not provide disaster assistance for the rehabilitation, replacement, or restoration to a person who has failed to meet these requirements.

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

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

For RMB, these prohibitions are evaluated in the context of reimbursement for completed work. If federal law would have prohibited assistance at the time the work was performed (e.g., failure to obtain and maintain required flood insurance), the Program will not reimburse those costs.

Section 582 of the National Flood Insurance Reform Act mandates that Pinellas County must inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so. The requirement to maintain flood insurance shall apply during the life of the property, regardless of transfer of ownership of such property. A Covenant Agreement shall be executed with Pinellas County prior to receiving disaster assistance to enforce this requirement.

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

10.1.1 Prohibition of Assistance for Lack of Flood Insurance Coverage

When a homeowner located in the 100-year floodplain allows their flood insurance policy to lapse, it is assumed that the homeowner is unable to afford insurance and/or is accepting responsibility for future flood damage to the home. Higher income homeowners who reside in a 100-year floodplain, but who failed to secure or decided to not maintain their flood insurance, should not be assisted at the expense of lower income households. To ensure that adequate recovery resources are available to assist lower income homeowners who reside in a 100-year floodplain but who are unlikely to be able to afford flood insurance, and in accordance with an alternative requirement established in the Universal Notice, RMB is prohibited from reimbursing costs associated with a home rehabilitation/reconstruction , if

(i) the combined household income is greater than either 120 percent of AMI or the national median,
(ii) the property was located in a 100-year floodplain at the time of the disaster, and
(iii) the property owner did not obtain flood insurance on the storm-impacted property, even when the property owner was not required to obtain and maintain such insurance.

10.1.2 Flood Insurance Enforcement and Monitoring

Pinellas County will enforce compliance with flood insurance requirements through a recorded Covenant Agreement executed prior to receiving disaster assistance. This agreement establishes the applicant's ongoing obligation to maintain flood insurance coverage on the assisted property for as long as the property exists or as otherwise required by Federal law, regardless of any change in ownership.

Compliance with these requirements will be monitored through the County's lien enforcement and flood insurance tracking system, in accordance with the procedures set forth in Pinellas County's Flood Insurance Monitoring Plan. The County will perform annual verification of active flood insurance policies and maintain documentation in each applicant's program file.

Failure to maintain required flood insurance coverage may result in recapture of CDBG-DR funds, ineligibility for future federal disaster assistance, or other corrective actions consistent with Section 582 of the National Flood Insurance Reform Act of 1994 and 24 CFR § 58.6(a)(3).

10.2 Applicant Cooperation with the Program

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

RMB 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, inspections, or other required meetings in a timely manner. RMB 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.

10.3 Applicant Responsiveness

The program will make reasonable attempts to contact applicants to schedule meetings, collect documentation, or obtain other information necessary. 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. Applicants who become non-responsive after construction activities have commenced may be subject to repay program funds expended on construction activities prior to the application being closed.

10.4 Conduct and Program Participation Expectations

To promote efficient, respectful, and timely delivery of disaster recovery assistance, all homeowners, household members, and authorized communication designees participating in the People First (CDBG-DR) Hurricane Recovery Program—Homeowner Reimbursement Program (RMB)—are required to maintain professional and cooperative conduct when interacting with County staff, program consultants, contractors, and subcontractors.

10.4.1 Participant Standards of Conduct

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

- Treat County staff, program representatives, contractors, subcontractors, 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 property access, inspections, verification of eligible work, and reimbursement documentation review.
- Facilitate timely scheduling of required inspections or verifications and refrain from obstructing or delaying authorized program work.
- Follow all program policies, procedures, and agreements established to ensure compliance with federal, state, and local requirements.

10.4.2 Prohibited Conduct

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

- Use of threatening, profane, discriminatory, harassing, or aggressive language or behavior during any interaction with program staff, contractors, or partners.
- Making false or unfounded allegations of fraud, misconduct, or negligence.
- Physical intimidation, threats, or actions that create an unsafe or hostile environment for County staff, contractors, or other program representatives.
- Intentional interference with inspections, construction verification, or communication processes related to program implementation or reimbursement approval.

10.4.3 County Response to Prohibited Conduct

If a homeowner, 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 homeowner.
- Temporarily suspend program activities, including inspection scheduling, payment processing, or communications, 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 the Program Guidelines or related agreements.

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

11 Voluntary Withdrawal

An Applicant may request to withdraw from the Program at any time. While voluntary withdrawal after execution of a Homeowner Grant Agreement is discouraged, as construction activities may have begun, any request to withdraw after a Homeowner Grant Agreement has been signed will be evaluated on a case-by-case basis.

Applicants may indicate a desire to withdraw to any RMB 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 RMB 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.

12 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, including any contractor misconduct or defective work. 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.*

12.1 Fraud Awareness, Prevention, and Beneficiary Assistance

Pinellas County will provide HRRP applicants and beneficiaries with information designed to raise awareness of potential fraud risks associated with disaster recovery activities, including contractor fraud, identity theft, and misrepresentation of program benefits. Fraud awareness information will

be provided through program materials, intake counseling, written notices, and the program website.

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

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

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

12.2 Reporting Fraud

Any allegations of fraud, waste, abuse, or mismanagement related to CDBG-DR funds or resources must be reported to the Pinellas County Clerk of the Circuit Court and Comptroller Inspector General (Internal Audit Office), directly to the HUD Office of Inspector General (OIG), or to any 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 4: Reporting Fraud, Waste, and Abuse

Allegations of fraud, waste or abuse can also be reported directly to the **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 5: HUD OIG

13 Complaints

Applicants may submit a complaint to the program any time. In accordance with guidance outlined with Universal Notice, RMB 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**, RMB 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 RMB may do so through any of the following avenues:

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

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

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

Office Location	Operating Hours
2600 McCormick Drive - Suite 100 **Clearwater, FL 33759**	Monday through Friday, 8 a.m. to 5 p.m.
5000 Park Street - Suite 4 **St. Petersburg, FL 33709**	Monday through Friday, 8 a.m. to 5 p.m.

Table 6: Office Locations

14 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 Amount Determination;
- Recapture Amount.

Persons who wish to request an initial appeal related to RMB 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 RMB Appeals Coordinator will conduct an initial review using the request and supporting information submitted by the applicant and make a determination. When practicable, the determination will be made within fifteen (15) business days. Applicants will be notified in writing of the determination made on their initial appeal via an Initial Appeal Determination Notification.

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

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

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

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

Explanation of the resolution of the file.

15 Exceptions to Program Policies

The RMB Guidelines set forth the policy governing the program and approved RMB Standard Operating Procedures 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.

15.1 Exceptions to Program Policies and Maximum Assistance

Pinellas County may grant exceptions to certain Homeowner Reimbursement Program (RMB) 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.

16 Pinellas County Administrative Policies

As a recipient of CDBG-DR funds, there are several policies, procedures, and regulations which apply to all programs, projects, and initiatives undertaken as part of Pinellas County's CDBG-DR grant. These policies and procedures are outlined in the Pinellas County CDBG-DR Grant Manual. This Manual covers topics such as financial management, 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 RMB.

17 Program Income

Program income 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 program income in compliance with HUD regulations to ensure that all funds are used for eligible activities that support disaster recovery.

17.1 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.

17.2 Use of Program Income

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

17.3 Tracking and Reporting

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

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

17.4 Closeout Considerations

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

18 Closeout

Applications are closed after reimbursement payment has been issued and all required documentation is complete. Program staff will confirm file completeness (including eligibility, DOB, environmental determination, and payment records) before issuing a Final Notice of Closeout to the applicant.

RMB 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 of the program process. Because the case has undergone such extensive quality control throughout each phase, the closeout review is intended to provide a completeness review and final documentation accuracy of each individual application, rather than a comprehensive quality control review of each step.

Once all quality control review levels have been approved, the applicant will be sent a Final Notice of Closeout 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

100-year floodplain: The area subject to inundation from a flood with a 1% or greater chance of being equaled or exceeded in any given year.

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 Housing Rehabilitation, Reconstruction, and/or Elevation Program

Base Flood Elevation (BFE): Base Flood Elevation as determined by the Federal Emergency Management Agency (FEMA), is the relationship between the BFE and a structure's elevation. It is used to determine flood insurance premiums. The Federal Register sets the minimum elevation requirements for properties that will be assisted with CDBG-DR funding, and which require elevation. HUD has determined that structures designed principally for residential use and located in the 100-year floodplain that receive assistance for new construction repair of substantial damage or substantial improvement must be elevated with the lowest floor, including the basement, at least two feet above the BFE.

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

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

Damage Assessment: The initial program inspection of a structure damaged by Hurricanes Helene, Idalia, and Milton in which all damage repaired at the time, and damage still to be repaired are officially documented in an estimating software that allows for standard market pricing and local sales taxes to be applied to program eligible materials and labor in a consistent report format. The damage assessment reports will contain a detailed sketch of the structure along with exterior and interior photos.

Damage Repair Valuation (DRV): The Damage Repair Valuation, or DRV, will represent the Xactimate determined value of the repairs completed by the homeowner, or those caused to be repaired by the homeowner, prior to the program application submittal for RMB.

Duplication of Benefits: 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/Structure: A storm-damaged, owner-occupied residential structure located within Pinellas County (excluding City of St. Petersburg) that meets all applicable program eligibility requirements. Eligible properties include single-family homes, townhomes, condominiums, and manufactured or modular homes that sustained verified damage from

Hurricanes Idalia, Helene, or Milton. All work performed or reimbursed must comply with applicable building codes, permitting, environmental, and floodplain management requirements. Detached accessory structures such as garages, sheds, or carports are not eligible unless repair or removal was necessary to complete eligible work on the primary residence or to address a verified health or safety hazard.

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.

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.

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: For purposes of this Program, a multifamily structure means a residential structure containing five (5) or more dwelling units. Single-family owner-occupied dwelling units located within multifamily structures may be eligible only when the requested reimbursement is limited to eligible disaster-related repair costs that directly benefit the applicant's individual residential unit. Costs associated with shared building systems, common elements, exterior repairs, construction that benefits the overall structure or other units, work exceeding 50 percent of the pre-disaster value of the unit, or work involving reconfiguration of walls, floors, or ceilings are not eligible for reimbursement.

Owner-Applicant: An individual who applies to RMB for assistance with his/her primary residence.

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 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 Home: Properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance through RMB. A second home is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the storm or at the time of application for assistance. Additionally, seasonal, short-term and vacation rental properties are not eligible for assistance.

Single- Family Owner Occupied Dwelling Unit: Residential structure that is fully detached, semi-detached, or multi-unit duplex, quadruplex, triplex, townhouse or condominium 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.

Substantial Damage: Damage of any origin sustained by a structure whereby the cost of restoring the structure to its pre-damaged condition equals or exceeds 50 percent of the structure's pre-disaster market value.

Xactimate: A residential estimating software that is used to standardize estimates for construction costs.