

The College of the Florida Keys
Community Development Block Grant Disaster Recovery (CDBG-DR)
Workforce Recovery Training Program (WRTP)

The College of the Florida Keys WRTP Procedures

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Procurement:

No procurement relating to WRTP activities has been initiated prior to Agreement execution. In addition, the College does not anticipate any procurement activities that will require a Request for Proposal. The College will follow its approved purchasing directives and procedures for all purchasing and procurement.

Contract Administration:

The College will follow its approved directives and procedures for all contract administration.

Financial Management:

The College will follow its approved directives and procedures for WRTP financial management.

Monitoring:

The College will follow its approved directives and procedures for WRTP financial management to ensure monitoring in accordance with Uniform Administrative Requirements.

Recordkeeping:

The College will follow its approved directives and procedures for recordkeeping in accordance with Uniform Administrative Requirements.

Duplication of Benefits:

All projects supported by the HUD Community Development Block Grant (CDBG) must have procedures in place to ensure recipients are not receiving a duplication of benefits and that CDBG-DR funding must be the funding of last resort.

To prevent duplication of benefits, the College will require that all sources (federal, state, local, private) and amounts of disaster-related job training assistance (including WIOA) received or reasonably anticipated to be received are documented with submission of a WRTP application. Duplication of Benefits for job training assistance will only consider other sources of funding pertaining to the Hurricane Irma disaster declaration. Funds for a different purpose (i.e. housing repair) or general, non-specific purpose (i.e. interim housing assistance) will not be included.

There will be no Duplication of Benefits as it is statutorily not allowed. As such, participants in The College of the Florida Keys WRTP program must complete a Duplication of Benefits certification.

Application Intake

Participant Application: Individuals seeking to receive training, support services, or other benefits through the WRTP must complete an official WRTP application. This application may be found and completed by:

- Going online to www.RebuildFlorida.gov;
- Visiting a College of the Florida Keys' office location; or
- Contacting CFK by phone.

CFK's Contact Information can also be found on www.RebuildFlorida.gov.

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To qualify for this program, you must:

- Be eligible to work in the United States.
- Provide documentation establishing proof of identity.
- Be at least 18 years of age or older.

Qualifications will be certified by program staff prior to the commitment of training, job readiness, or other assistance to any participant.

Individuals are not guaranteed assistance but will be served based on availability of funds and qualification for benefits.

Applications will only be accepted during the published outreach period or until the target number of applications is received. Additional intake periods may be opened at a later date depending on funding availability for training and employment assistance for additional participants.

Participant income must be verified before eligibility is determined for the WRTP. Income eligibility is determined based on total household income and total household size. Income is calculated and verified using the following criteria:

Annual incomes as reported under the Census long-form for the most recent available decennial Census. This definition includes:

- (A) Wages, salaries, tips, commissions, etc.;
- (B) Self-employment income from own nonfarm business, including proprietorships and partnerships;
- (C) Farm self-employment income;
- (D) Interest, dividends, net rental income, or income from estates or trusts;
- (E) Social Security or railroad retirement;
- (F) Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- (G) Retirement, survivor, or disability pensions; and
- (H) Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

Applications are reviewed by CFK. CFK makes the determination on eligibility based on these program guidelines and CFK policies and procedures.

Certification requirements to receive assistance:

All participants must agree to the following to receive assistance:

- Sign a release so that information provided by the participant can be shared with state and federal agencies and certain third parties in order to verify information given to the program. The participant and everyone 18 and older in the household are required to sign the release.
- Swear to the accuracy and completeness of all information provided to the program under penalty of law.

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- Sign a subrogation agreement acknowledging that any overpayment of benefits will be subject to recapture.

Only completion and submission of the Rebuild Florida WRTP participant application, including the submission of all supporting documentation, will be considered as an individual's application for program services and benefits.

Any additional information or institution-specific forms utilized by the Subrecipient may be requested but may not be required.

Income Verification:

All projects supported by the HUD CDBG assistance must meet one of the program's three National Objectives: (1) benefiting low- and moderate-income (LMI) persons, (2) aiding in the prevention or elimination of slums or blight, or (3) meeting a need having particular urgency (urgent need). Low- to moderate-income households are defined as households that do not exceed 80 percent of the median income for their area, as determined by HUD. These income categories are grouped into the following classifications:

- Very low income: has an annual income at 30 percent or below the area median income,
- Low income: has an annual income at 31 to 50 percent of the area median income, and
- Moderate income: has an annual income at 51 to 80 percent of the area median income.

For the purpose of CDBG-Disaster Recovery programs, participants are required to verify income for any individual applying for services through the WRTP. Income will be documented using the following information and following the specific definitions of each category as outlined below:

Annual income as reported under the Census long-form questionnaire for the most recent available decennial census. This definition includes:

- a) Wages, salaries, tips, commissions, etc.;
- b) Self-employment income from own nonfarm business, including proprietorships and partnerships;
- c) Farm self-employment income;
- d) Interest, dividends, net rental income, or income from estates or trusts;
- e) Social Security or railroad retirement;
- f) Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- g) Retirement, survivor, or disability pensions; and
- h) Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

Income eligibility is determined based on total household income and total household size. Applicants will be expected to provide income verification for all applicable household members.

CDBG regulations permit self-certification of income for public service activities as referenced in 24 CFR 570.506(b). As such, the College will allow participants the opportunity to

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self-certify. In such cases, participants and all family members or members in the household will complete the CDBG Self-Certification Form.

Re-qualification of income is not required after assistance begins.

Eligibility Determination:

To be eligible for The College of the Florida Keys' WRTP program, applicants must be legally eligible to work in the United States and must be 18-years of age or older. Participant eligibility will be established in the application process. Any participant who applies for the program and cannot provide required documentation regarding income, work eligibility, identity, age, or otherwise fails to meet WRTP criteria will be considered ineligible for program participation.

Language Access:

The College will make all program application materials available in English, Spanish, and Haitian Creole. Should an applicant need application materials in an alternative language, they can request assistance by contacting the College's Director, Community Engagement and Testing. The College will make reasonable efforts to accommodate language barriers for all applicants and participants.

Reporting:

The College will follow its approved directives and procedures for reporting.

Complaints and Grievances:

Complaints regarding The College of the Florida Keys' Workforce Reentry Training Program may be submitted by participants or participant applicants at any time during the program's life cycle about any issue experienced with the program. The College provides an opportunity to resolve complaints in a timely manner, usually within fifteen (15) business days as expected by HUD, if practicable, and to provide the right to participate in the process and appeal a decision when there is reason for an applicant to believe its application was not handled according to program policies.

Participants or participant applicants may file a complaint any time via the WRTP Program Complaint Form located on The College of the Florida Keys' website. Applicants or participant applicants may also file a complaint or request information by contacting the College's Director, Community Engagement and Testing by telephone, email, or mail.

For any complaint or grievance not determined to be the result of a policy or procedure that is specific to the WRTP program, the College will follow Board Rule 7.520 Student Complaint Policy.

For any complaint or grievance that is determined to be the result of policies or procedure specific to the WRTP program, participants or participant applicants will be given adequate opportunity to bring complaints to the attention of the College with the assurance that the proper officials will promptly investigate the facts of the case and evaluate these facts in an objective manner.

In the investigation and resolution of complaints is protected to the highest extent possible. However, due to the College's commitment to thoroughly investigate all formal

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complaints, confidentiality cannot be assured throughout all steps of the complaint process. The procedure for reporting, investigating, and resolving complaints can be found in the College's Procedures.

Complaints or grievances relating to actions or decisions made by DEO may be filed with DEO. Individuals may file a written complaint through the Office of Disaster Recovery email at CDBG-DR@deo.myflorida.com, via the online complaint form available at <http://www.rebuildflorida.gov>, or by postal mail to the following address:

Attention: Rebuild Florida Constituent Services
Division of Community Development
Florida Department of Economic Opportunity
107 East Madison Street
The Caldwell Building, MSC 160
Tallahassee, Florida 32399

Appeals:

Participants may not appeal program policy. If an individual feels they have been denied services or benefits and they wish to file an appeal to the original eligibility decision, they must submit a formal written appeal letter to the College's Dean, Marine Science and Technology by mail or email at any time during the programs life cycle. All appeal letters must include:

- a) Reason for appeal
- b) A clear explanation why the denial was contrary to applicable laws or regulations or in some other way inequitable
- c) Reason why individual is believed to be eligible for the service or benefit that was denied, delayed, reduced, modified, or terminated
- d) Proposed remedy sought by the individual
- e) Name, contact address, and contact telephone number of individual filing appeal; and
- f) Signature and date.

At the conclusion of the appeals process if the complainant has not been satisfied with a response, a formal complaint may be addressed directly to the Department of Economic Opportunity (DEO) at:

Office of Disaster Recovery, Special Deputy of Appeals
Division of Community Development
Department of Economic Opportunity
107 East Madison Street
Caldwell Building, MSC-160
Tallahassee, FL 32399

Detection and Prevention of Fraud, Waste, and Abuse

The College will follow its approved directives and procedures to ensure the detection and prevention of fraud, waste, and abuse.